

Westminster After Dark:

New West End Company response

Summary

New West End Company welcomes the opportunity to respond to Westminster After Dark. The development of this new plan, and its intended aim of creating an inclusive and safe evening and night-time economy, is something that we are supportive of.

New West End Company is a partnership of 600 retail, restaurant, hotel and property owners across the world's top shopping and leisure destination, anchored by Bond Street, Oxford Street, Regent Street and Mayfair. The West End is an important economic and cultural hub, contributing 3% of London's GVA annually.

As the Business Improvement District representing this district, we have a number of concerns which we feel should be taken into account by the before finalisation of the Westminster After Dark Plan.

In summary, our concerns are:

- The lack of context provided around the varying drivers of crime, particularly in relation to geographical area and concentration (or lack thereof) of licensed premises;
- The misleading categorisation of areas across Westminster, including the conflation of Soho with the West End's key shopping streets of Oxford Street, Regent Street and Bond Street. This categorisation obscures the commercial importance of Oxford Street, in particular, to both the local and national economy;
- The implementation of Late Night Entertainment Zones, including that proposed on Oxford Street.

These concerns are broken down in greater detail below.

Contextual understanding of the drivers of crime and anti-social behaviour:

The Westminster After Dark Strategy rightly considers crime and anti-social behaviour (ASB) as a key component for the future development and implementation of the strategy; indeed, concerns around crime and ASB emerge are shared between various different stakeholder groups, from residents to business owners. The Strategy also identifies that the West End and St James's wards experience the majority of violent crimes (59%), robberies (70%), sexual offences (65%) and Violence Against Women and Girls (VAWG) incidents (46%). It is notable that the former two crime types primarily take

place between 6am and 6pm – prior to when the majority of licensed venues are likely to see peak footfall, and outside the After Dark’s stated hours of interest.

We also retain concerns that these raw figures in the document fail to take into account both footfall within the area, or other drivers of crime – particularly when there is an absence of significant numbers of licensed premises, as there is in the West End. Indeed, the West End – referenced here to mean the 82 streets covered by the New West End Company’s BID district, anchored by Oxford Street, Bond Street and Regent, but excluding Soho – has experienced rapid increase in crime, which is now reaching pre-pandemic levels despite a significant reduction in footfall.

We therefore feel that the After Dark could be improved by reflecting on these drivers of crime, which have not been factored in when considering a return in crime numbers to pre-pandemic levels. To connect rising levels of crime and anti-social behaviour to licensed premises without considering this holistic picture is, in our view, potentially misleading, and will prohibit an actionable and effective mitigation strategy to emerge.

Commercial importance of West End shopping district:

The West End (as defined above by New West End Company) is renowned internationally as a retail and leisure destination. It attracts investment from a variety of sectors, including retail, hospitality, entertainment and leisure, and, increasingly high-quality office provision for global companies.

Against this backdrop, it is critical that the West End’s shopping district is considered in light of its unique identifying factors; low resident numbers, the presence of global retail and leisure brands, presenting a desirable investment opportunity for national and international developers and, crucially, its low number of licensed premises.

This is not to deny that the shopping district faces its own crime challenges, as outlined above. However, a failure to consider the specific factors at play in the shopping district runs the risk of developing and implementing an After Dark plan which tackles crime and anti-social behaviour in a way which is only applicable to a small geographic area. With this in mind, we feel strongly that a strategy for the West End should be distinct, and in keeping with its unique character – therefore we are advocating that it is decoupled from Soho as one of the five areas of focus, and considered on its own.

Late-Night Entertainment Zones:

Oxford Street alone generates 5% of the West End's economic value, and falls within the scope of a proposed Mayoral Development Corporation, tasked with driving forward its regeneration. It is critical that any plans to evolve Oxford Street's offer through a Late Night Entertainment Zone (LNEZ) take into account the locally and nationally important role that the street plays and consider how a different licensing policy at one end of the street may affect footfall, crime and investment across the street's entirety.

To properly manage any increased visitation to the LNEZ, we are also strongly advocating for an expansion of night services on public transport and continued funding of public transport infrastructure to ensure that existing visitors to the district – including a growing office worker population – can continue to access the area with ease.

We would also like to understand in greater detail how the proposed LNEZ will be administered, and how it will intersect with the ongoing Mayoral licensing pilot and future MDC (which itself will not have any licensing powers). It is imperative that there is a consistent and complementary licensing and planning regime in place for Oxford Street and the surrounding streets to encourage continued investment into the district, and to ensure the administrative burden on businesses remains manageable.

Conclusion:

We appreciate the opportunity to share our feedback to the After Dark Strategy, and hope that the City Council will consider our concerns, outlined above. We firmly support the strategy's stated intention to create an exciting and including evening and night-time destination, and look forward to working with the City Council and statutory partners to achieve this.