

New West End Company Response to the Licensing Consultation

New West End Company represents over 800 businesses across London's West End, anchored by Oxford Street, Regent Street and Bond Street. Our members include many of the most respected global names in retail, leisure, hospitality, culture, property and business. For them, the West End isn't just an address – it's a gateway for visitors, talent and investment.

That's why, for more than two decades, we have worked alongside Westminster City Council, the Metropolitan Police, the Mayor of London and the Government to ensure the West End remains the best place in the world to work, visit and do business. Over the next five years, we are investing £60 million directly into services which will make the district stronger, safer and even more competitive.

This investment includes over £4 million on security operations, designed in close partnership with the Metropolitan Police, Westminster City Council, and Transport for London to ensure they meet the West End's needs. Our 24/7 street patrol team is London's largest private security presence, and we have invested heavily in industry-leading security infrastructure to enable rapid and effective intelligence sharing with our member businesses and stakeholders.

As a result, we hold a unique position as a body with deep operational insight, which also acts as a strategic voice for one of London's most complex and high-footfall environments. It is from this position that we submit this response to the Mayor's London Strategic Licensing Consultation.

New West End Company's position

New West End Company is conditionally supportive of the direction of travel set out in the draft London Strategic Licensing Policy 2026–31. We welcome the Mayor's ambition to modernise and simplify London's licensing framework, to promote consistency and to support a diverse and thriving night-time economy. A well-functioning licensing system is integral to the West End's continued growth and its global reputation.

However, our support is conditional on greater clarity being provided on the practical implications of the proposed policy for the West End specifically. As home to some of London's most economically and culturally significant venues and streets, the West End operates in a unique context which is not always captured in a city-wide policy framework.

Areas of support

New West End Company strongly welcomes the policy's focus on supporting economic growth and a vibrant 24-hour economy. The West End is increasingly competing with other global destinations for visitors, businesses and events, and a progressive, proportionate licensing regime is essential to that competitive position. We are particularly supportive of the following:

- **International competitiveness:** The West End holds International Centre status under the London Plan and competes directly with destinations such as Paris, New York and

Tokyo. A modern, proportionate licensing regime is essential to maintaining London's global competitive position, and we would encourage the policy to embed international benchmarking as a core part of its evidence base.

- **Diversifying the night-time economy:** The West End's offer is increasingly diverse, with experiential retail, late-night dining, members' clubs and mixed-use spaces sitting alongside traditional hospitality venues. We welcome changes that allow licensing policy to reflect this breadth and to recognise the interdependence of retail, hospitality and leisure alongside offices in a mixed-use district.
- **Greater consistency across London boroughs:** Inconsistent approaches to licensing across borough boundaries create unnecessary uncertainty for businesses and can act as a barrier to investment. We support efforts to standardise good practice through the proposed London Licensing Playbook.
- **Innovation and meanwhile spaces:** We support proposals to encourage the active use of vacant units and underused spaces through flexible licensing approaches, where appropriate. This aligns with New West End Company's work on animating the West End and ensuring its streets remain vibrant and economically productive.

The Mayor's call-in powers

A particular area in which New West End Company requires clarification is the proposed call-in powers for the Mayor of London. We recognise that effective licensing decisions depend on detailed local knowledge and would welcome clarity on how the Mayor's call-in power would draw on the expertise of local licensing authorities and operational partners, including Business Improvement Districts (BIDs). Mayoral intervention, if not carefully scoped and managed, could risk adding complexity rather than improving outcomes.

The licensing process is already a complex system to navigate and the possibility of call-in powers could add an additional layer. New West End Company would also appreciate a clear threshold and criteria for what constitutes an application of 'strategic importance' and whether these criteria will be published.

Policy alignment

New West End Company would welcome clarification on how the Mayor's licensing policy will interact with the current planning system, and in particular with the recently established Oxford Street Development Corporation. How will the Mayor's licensing policy align with Westminster's After Dark Strategy and Westminster City Council's existing approach to Cumulative Impact Assessments (CIAs)?

In the West End, CIAs can act as a blanket restriction that stifles investment and new openings, even where premises are well-managed. We would urge the Mayor to ensure that CIAs are applied proportionately and reviewed regularly, consistent with the policy's own stated priority of ensuring a proportionate approach.

Further considerations

- **Transport:** Any expansion of night-time licensing in the West End must be matched by commensurate investment in late-night transport infrastructure. The West End already experiences significant pressure on transport networks during evening and night-time periods – New West End Company’s own visitor data shows that 48% of visitors arrive by Tube, with limited alternative options during late-evening hours. We urge the Mayor to ensure that the licensing policy is developed in close coordination with TfL’s forthcoming consultation and the Oxford Street pedestrianisation plans, so that transport capacity keeps pace with increased night-time activity. Furthermore, we would ask that the policy explicitly commits to assessing transport impact as part of any strategic licensing decision. We note that the independent Nightlife Taskforce has also recommended improved night transport as essential to a thriving night-time economy.
- **Crime and safety:** New West End Company’s data finds that crime in the West End is predominantly opportunistic acquisitive crime, taking place largely during the day and early evening. Any significant expansion of night-time activity will require a proportionate increase in policing resource and safety investment. New West End Company invests £3.4 million annually in security operations across the district, rising to over £4 million from April 2026, and works in an established partnership with the Metropolitan Police. We should be closely involved as this policy is developed and stand ready to share our operational intelligence and data with the Mayor’s team.
- **Cumulative costs and the Overnight Visitor Levy:** Businesses in the West End are already facing a significant financial and regulatory burden, including increases to business rates, employer NICs and rising operational costs. The potential introduction of an Overnight Visitor Levy would compound these pressures further. We would urge the policy to acknowledge the cumulative burden on businesses and ensure that the licensing framework does not add disproportionate costs or administrative requirements at a time when the sector is already under significant pressure.
- **BIDs as formal stakeholders:** The draft policy references BIDs among wider stakeholders but does not formally recognise the distinct role they play in the licensing ecosystem. New West End Company holds unique operational data and street-level intelligence that should directly inform licensing decisions in the West End. We would ask the policy to formally recognise BIDs as key partners in the licensing process, not simply as ‘businesses’.
- **Data and evaluation:** New West End Company would welcome clarity on how the data-sharing framework proposed in the policy will work in practice, and we would encourage the Mayor to recognise BIDs such as New West End Company as contributors to and beneficiaries of this shared evidence base. We would also value clarification on how the proposed pilot will be evaluated and what role BIDs and business stakeholders will have in any review process.

Responses to specific consultation questions

In addition to the points set out above, New West End Company wishes to record its position on the following specific consultation questions:

Which of the intended results of the London Strategic Licensing Pilot are most important to you? Please select the three most important to you.

The three outcomes most important to New West End Company, in no particular order, are: (1) licensing decisions that support local businesses; (2) London to be seen as a great city for culture, nightlife, hospitality and events; and (3) more reasonable, proportionate licensing decisions.

Are there any other intended outcomes of the London Strategic Licensing Pilot that are important to you?

Yes. New West End Company considers it important that the pilot formally recognises the role of Business Improvement Districts as key operational and strategic partners in the licensing system, and that BIDs are treated as distinct stakeholders with unique data and intelligence, rather than simply as 'businesses'. We would also welcome an explicit commitment to ensuring that licensing reform supports the broader mixed-use ecosystem of the West End, including retail, offices, leisure and cultural institutions, not only traditional hospitality venues.

Which of these types of applications do you believe should be considered strategically important? Please tick all that apply.

New West End Company considers the following categories of application to be strategically important: venues or events in iconic or high-profile locations that shape London's national or international profile; venues in important night-time or cultural areas (such as major town centres); large venues with a considerable impact on London's economy, culture or night-time activity; applications linked to major Mayoral development projects (including the Oxford Street Development Corporation); major events or festivals that attract large numbers of visitors; and temporary venues or bringing empty or underused spaces into active use (meanwhile use). The West End itself should be recognised as a location of strategic importance given its International Centre status under the London Plan.

Please rank these 5 principles in order of importance, where 1 is the most important for you and 5 is the least important.

Whilst all these principles should be viewed as important, New West End Company's suggested ranking is:

- (1) Support economic growth, socialising and culture;
- (2) Recognise and value the safety and health benefits of well-managed night-time activity;
- (3) Be evidence-led, proportionate and reasonable, avoiding unnecessary costs and burdens;

- (4) Ensure a transparent licensing process, supported by early engagement, proportionate enforcement and starting with simple steps before taking stronger action to fix problems;
- (5) Support a mix of cultural, hospitality and night-time activities to include everyone.

Do you have any comments or suggestions on the proposed principles?

New West End Company supports the proposed principles and considers them a constructive framework. We would suggest that the principles should make explicit reference to the role of data and evidence in informing licensing decisions, and should recognise the contribution that BIDs and other operational partners can make to that evidence base. We would also welcome a principle that acknowledges the importance of aligning licensing with transport planning, given the direct link between late-night transport provision and the viability of the night-time economy.

Please rank these 5 Mayoral priorities in order of importance, where 1 is the most important for you and 5 is the least important.

New West End Company's suggested ranking is:

- (1) Ensure London stays a safe, welcoming and inclusive city;
- (2) Promote better alignment between the licensing and planning regimes;
- (3) Ensure a proportionate use of cumulative impact assessments;
- (4) Promote major events, socialising, social cohesion and community life;
- (5) Contribute to bringing high streets back to life through making good use of empty spaces (meanwhile use), pavement licensing and innovation for nightlife spaces.

Do you have any comments or suggestions on the proposed priorities?

New West End Company strongly supports the priority of promoting better alignment between licensing and planning. In the West End, planning and licensing decisions often proceed on separate tracks, creating inconsistency and uncertainty for businesses and investors. We also welcome the priority on proportionate use of CIAs. In the West End, cumulative impact policies can function as a blanket restriction that discourages investment and new openings, even where premises are well-managed and would contribute positively to the area. We would urge the Mayor to ensure that CIAs are applied proportionately, reviewed regularly, and do not act as a barrier to the kind of growth and diversification that the policy itself seeks to promote.

Are there any other relevant opportunities that could be included or strengthened as part of this policy and how?

The policy should explicitly address the relationship between licensing reform and transport investment. Any expansion of licensed activity, particularly in high-footfall destinations such as the West End, must be supported by commensurate investment in late-night transport infrastructure. We would also encourage the policy to embed international benchmarking as a

standing element of its evidence base, given that the West End competes directly with global destinations and London's licensing framework should be assessed in that context.

What do you think of the expectations set out in the policy for licensing authorities, responsible authorities and applicants?

New West End Company welcomes the emphasis on early engagement, proportionate enforcement and graduated approaches to resolving problems. These are consistent with our own operational experience in the West End, where constructive partnership between businesses, the council and policing partners delivers the best outcomes. We would ask that the expectations also recognise the role of BIDs as operational partners who can facilitate early engagement and provide real-time intelligence to licensing authorities.

What data, information or evidence would be most useful to you that you do not currently have access to?

New West End Company would welcome access to consistent, borough-level licensing data across London, including processing times, approval rates, conditions applied and outcomes of reviews. Comparable data across boroughs would allow BIDs and business stakeholders to identify inconsistencies and advocate for improvements. We would be keen to ensure the insights New West End Company collates can best inform the consultation process and would welcome the opportunity to discuss how.

Do you have any other comments on the content of the draft London Strategic Licensing Policy?

New West End Company would encourage the Mayor to ensure that the policy is developed in close coordination with Westminster City Council's After Dark Strategy, which sets out a 15-year vision for Westminster's evening and night-time economy. Alignment between these frameworks will be essential to delivering coherent outcomes in the West End. We would also urge the policy to acknowledge the cumulative regulatory and cost burden on businesses, including the potential introduction of an Overnight Visitor Levy, and to ensure that the licensing framework does not add disproportionate costs at a time when the sector is already under significant pressure.

Conclusion

New West End Company would welcome the opportunity to brief the Mayor's licensing team on the operational realities of the West End and to explore how New West End Company's data, intelligence and operational experience can support the pilot's success. We believe that genuine partnership between City Hall, Westminster City Council, and organisations like New West End Company will be essential to the success of the pilot.

