Response to Westminster City Council Draft Statement of Licensing Policy

The Oxford Street Development Corporation (OSDC) welcomes Westminster's commitment to maintaining a safe, well-managed and diverse evening and night time economy. The West End is an international cultural, leisure and visitor destination in which licensed premises play a significant role - generating £3.7 billion GVA and supporting 80,000 jobs according to Westminster's own estimations. Beyond these direct benefits, licensed premises create the cultural and amenity offer that attracts major employers and other commercial occupiers to the area.

Westminster is responsible for managing one of the world's great commercial districts. Its licensing policy should therefore have two equal ambitions: 1) protect residents and visitors and 2) actively support investment, employment, culture and economic growth. We are concerned that the draft policy succeeds on the first objective but falls well short on the second.

Despite this important role of licensed premises, Westminster's draft statement of licensing policy includes many provisions that will harm the sector. In particular, the West End Cumulative Impact Zone (CIZ), the cumulative impact policy and the core hours policy impose significant barriers to new investment and business growth.

Our response focuses primarily on the implications of the West End Cumulative Impact Zone given the overlap with the OSDC Mayoral Development Area. We are primarily concerned that the evidence behind the draft statement of policy does not warrant the restrictive policies proposed. We encourage a more nuanced approach that avoids the use of blanket restrictions in favour of targeted mitigation measures for individual applications based on clearly evidenced harms. This will enable Westminster to manage impacts whilst also supporting responsible operators, enabling licensed premises to supporting employment, economic growth, and London's international competitiveness.

Strategic concerns

Westminster's licensing policy should be one of the key delivery mechanisms for the renewal of the West End. The city is entering a period of unprecedented investment in Oxford Street and its surrounding districts, supported by significant public sector intervention and substantial private capital. The licensing framework should therefore actively enable this transformation by encouraging responsible investment, innovation and high-quality operators. A policy whose defining characteristic is restriction risks signalling that Westminster is closed to new ideas precisely when London should be demonstrating confidence in its future.

We welcome Westminster's recognition of the economic benefits brought about by licensed premises, but the proposed policy framework makes these difficult to achieve - as is shown by the reduction in the number of licence applications.

Cumulative Impact Policy CIP1 sets an expectation that any new application for a pub, bar or music and dance venue will be refused. Other types of premises, including restaurants, must demonstrate that they will not add to any cumulative impact by meeting a high evidential threshold. This is an impossible task for businesses, who are reliant on footfall (one of the chosen indicators of cumulative impact) for commercial success. This creates a tension at the heart of the policy: whilst aspirations for economic growth are stated, the proposed policies will likely lead to reduced investment and fewer businesses operating locally.

The Cumulative Impact Assessment (CIA) does not demonstrate the strategic case for this position. Economic, cultural and social benefits are not considered, and no analysis is made on how GVA and employment may be negatively impacted if the number of licence applications and licensed premises continues to decline. The CIA outlines a worrying trend of licence applications falling by 27% between 2023 and 2024, with an 80% reduction in pub and wine bar applications, a 43% reduction in restaurant applications and a 30% reduction in café applications. These figures show that are broad range of businesses, and not just those operating late at night, are being impacted by an extremely challenging operating environment in Westminster. The licensing policy should be used as a positive tool to support businesses in overcoming these wider barriers rather than creating a further burden.

The licensing policy is also misaligned with key London strategies. The Licensing Act Section 182 guidance requires licensing authorities to consider the Mayor's vision for Good Growth in their own policies, but neither the Mayor's Good Growth agenda, nor the London Growth Plan are referenced. Although the findings of the London Nightlife Taskforce are acknowledged, the policy contradicts the Taskforce's recommendations to "remove Cumulative Impact Assessments and core hours policies for nightlife spaces".

Ultimately, the draft statement of licensing policy misses the opportunity to proactively articulate a positive vision for growth that encourages innovation amongst licensed premises and their contribution to Westminster's position as an international cultural and visitor destination. Such an approach would better reflect the new administration's stated ambitions to support "a vibrant, responsible business environment".

Concerns regarding the Cumulative Impact Assessment

A fundamental concern is whether the Cumulative Impact Assessment (CIA) provides sufficiently robust evidence to justify the CIZ and Cumulative Impact Policy CIP1. The CIA contains a significant amount of data and analysis, but much of this does not establish a clear relationship between licensed premises and crime, antisocial behaviour or noise.

Methodology of cumulative impact scores

The cumulative impact score is calculated as: Crime + ASB + Noise + Footfall + 2(Licensed Premises Density). The application of a double weighting to licensed premises density assumes the desired conclusion within the methodology. This formula gives the concentration of licensed premises greater weight than crime, noise or antisocial behaviour and fundamentally assumes they have greater bearing on cumulative impact. The CIA even acknowledges that two areas with equally high incident levels would receive substantially different scores if one has a significantly higher concentration of licensed premises.

Similarly, footfall is considered a negative indicator of cumulative impact, rather than a sign of a thriving economy. This is despite the draft licensing policy acknowledging that footfall may contribute to reductions in antisocial behaviour and levels of crime and disorder, which ultimately promotes the licensing objectives. As a major international district, the West End is home to high footfall and large volumes of activity and much of this may also not relate to licensable activity. The methodology therefore turns what could be an indicator of success into a problematic measure.

Inequitable treatment of premises

CIP1 sets a position against licences for new pubs, bars, fast food premises and music and dance venues. This is despite the fact that the CIA does not differentiate the impact of one kind of licensed premises from others. The assessment instead shows a dense mix of accommodation, cafes, clubs, pubs and bars, restaurants, shops and other licensed premises operating in close proximity within the West End. The CIA considers these premises collectively, yet only some are subject to the most restrictive provisions of CIP1. In seeking a more nuanced approach to determining cumulative impact, the CIA should undertake analysis of the impacts and benefits across different venue typologies to justify the basis for refusing new applications from pubs, bars, music and dance venues and fast food premises without imposing the same restrictions on casinos and adult entertainment venues.

Limitations of underlying data

The CIA states that there is a strong and persistent association between high densities of licensed premises and cumulative impact. There are important issues with the data used to reach this conclusion.

Considerable emphasis is placed on elevated levels of crime occurring at midnight, with midnight cited as the peak night time crime hour at 5% of all hourly crime. However, the assessment also acknowledges that the Met's reporting procedures assign all incidents with unknown occurrence times to midnight by default. This risks inflating the prevalence of crime taking place during late night hours and artificially associating late night venues with crime. Given the importance of this data, greater scrutiny is needed before drawing policy conclusions from the reported peak in crime hours.

Elsewhere, the data suggests that the relationship between high densities of licensed premises and cumulative impact is less clear than presented. For example, whilst 40% of all licensed premises in the borough are in the CIZ, only 29% of alcohol-related ASB occurs in the same area. Similarly, almost half of ASB calls occur outside of evening and late night hours suggesting that ASB cannot be solely attributable to late night activity.

The CIA states that theft is the biggest contributor to crime within the CIZ but there is a risk that the crime data overstates the contribution of licensed premises. Data (1, 2) from the Met indicates that up to a third of all thefts in the CIA period may relate to phone snatching. No evidence is provided that attributes phone theft to licensed premises and the CIA puts the burden on operators for wider issues relating to crime and high visitor footfall.

We have recently seen positive reductions in phone theft and increased investment by MOPAC into the West End Fusion Cell, but the licensing policy position is not sufficiently flexible to respond to these improvements. A more permissive policy would enable the council to reflect changes in the wider urban environment without needing to revise its whole policy.

Core Hours policy

Soho and the Wider West End are unlike anywhere else in London, yet Core Hours policy HRS1 presents a significant risk to their vitality. The area houses a rich mix of culture and leisure and it is unclear why late night activity is treated as inherently problematic, rather than an integral component of the area's character to be celebrated.

The proposed core hours are not reflective of licensed premises' operating models. Limiting licensable activities in music and dance venues after midnight at a weekend would require these businesses to miss out on their peak trading hours and is entirely misaligned with consumer expectations. HRS1 could even exacerbate cumulative impact by increasing the number of people on the streets at once if all venues close at the same.

Insufficient consideration is given to alternative approaches beyond the introduction of core hours, including staggered closing times and managed dispersal schemes which allow customers to disperse gradually. These measures may be more effective in addressing cumulative impact rather than simply moving closing hours earlier.

Equalities and cultural impact

Assessment of the equalities impacts of the draft policy should give greater consideration to the disproportionate impacts on particular communities and venues. The CIZ is home to a significant concentration of London's LGBTQIA+ venues and cultural spaces, many of which operate through licensed premises. These venues provide important community infrastructure, safe spaces, and opportunities for social connection. Their rates of closure have been an ongoing concern and the licensing policy risks further jeopardising these spaces.

Grassroots venues in particular often operate on narrow margins. The high evidential burden required to rebut cumulative impact assumptions may favour larger operators with access to specialist legal and licensing expertise, which cannot be absorbed by smaller businesses. This raises concern that the draft statement of policy may unintentionally reduce diversity within the West End's hospitality, leisure and culture sectors and this should be more explicitly considered through the Equalities Impact Assessment.

Planning policy alignment

As the Local Planning Authority for the Oxford Street area from 10th August 2026 within the West End CIZ, OSDC will have direct responsibility for shaping development in the area. While planning and licensing are separate, decisions taken through either regime can materially affect the successful delivery and operation of development, the vitality of places and the evening and night time economy. Greater alignment is therefore required at both policy and operational level.

The draft London Plan categorises the West End as an internationally significant night time economy cluster and recognises hospitality, culture, nightlife, events and the experience economy as important strategic function of the CAZ. Westminster's own City Plan similarly recognises Oxford Street's international role and seeks to support a diverse evening and night time economy and enhanced cultural offer. The draft licensing policy does not sufficiently consider how CIP1 and HRS1 will impact these wider strategic ambitions.

Broad restriction of particular licensed premises risks constraining investment, the successful activation of ground floors and the delivery of well-designed mixed-use development. Given OSDC's statutory planning responsibilities, an agreed approach to consultation and coordination should be established to ensure coherence between planning and licensing.

Concluding remarks

OSDC supports Westminster's commitment to promoting the licensing objectives and the pro-growth pragmatism of the Council's leadership. However, the current draft statement of licensing policy places disproportionate emphasis on restriction and inflexibility rather than management, partnership and innovation. The draft policy adopts an unnecessarily precautionary approach that risks constraining investment without demonstrating that the proposed restrictions are proportionate to the evidence presented.

Wider evidence suggests that this is also in line with residents' priorities in the area. Westminster's 2023 City Survey highlighted many areas of concern for residents in the West End, including street begging, heavy traffic and poor air quality. Only 7% of respondents felt issues related to licensed premises were a problem. A similar pattern emerged in the 2025 City Survey where homelessness, drug use, begging, litter and street cleanliness were residents' main concerns. Issues related to licensed premises did not feature as a priority.

Against this context, the evidence presented in the CIA does not sufficiently demonstrate that the levels of restriction imposed by policies CIP1 and HRS1 are proportionate interventions - particularly given the absence of detailed economic, cultural and social impact analysis. Westminster's position as a world-leading cultural and visitor destination depends on a diverse, vibrant and responsibly managed night time economy. The licensing policy should place greater emphasis on targeted mitigation measures, responsible venue management and partnership working, rather than broad restrictions that risk constraining investment and cultural activity across the West End.