

Licensing Policy Consultation Responses Received Via Smart Survey

1. Licensing Policy and Cumulative Impact Assessment Consultation

2. Cumulative Impact Assessment

1. Do you agree that the Licensing Authority should implement a Cumulative Impact Policy?										Response Percent	Response Total
1	Yes									73.68%	42
2	No opinion									12.28%	7
3	No									14.04%	8
Statistics	Minimum	1	Mean	1.4	Std. Deviation	0.72	Satisfaction Rate	20.18	answered		57
	Maximum	3	Variance	0.52	Std. Error	0.1			skipped		0

2. If you have any comments about the implementation of a Cumulative Impact Policy, please provide them below:										Response Percent	Response Total	
1	Open-Ended Question									100.00%	31	
1	12/10/2020 19:42 PM ID: 150000476	I think the Cumulative Impact Assessment should be delivered in such a way that it is easy for the layperson to understand it. In its current form it does require a significant level of analytical knowledge and understanding, which most Westminster residents are unlikely to have. The policy is also delivered in such a way as for the language to act as a barrier, rather than being understandable to the majority of people. Therefore how can you expect to get a meaningful response to this consultation?										
2	12/10/2020 19:44 PM ID: 150004612	Implementation will have a positive effect.										
3	13/10/2020 09:38 AM ID: 150020804											
4	13/10/2020 12:47 PM ID: 150037782	I support the growth of local shops and businesses but some have noisy customers outside or leaving a premises or attract the kind of customers that bring										

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		<p>in crime. Food outlets that have a large delivery service provided by bike couriers take all the parking spaces without paying and also obstruct pavements. Likewise, licensed premises especially with licenses after 11pm, for example casinos or hotel ballrooms, tend to attract more trouble. The casinos on Edgware Road, also being close to lots of cheap hotels, are attracting street prostitutes who attract other car customers, pimps and drug dealers, and professional beggars, and are affecting all the residential streets and squares south of Edgware Road. The Royal Lancaster regularly has (pre-covid) large crowds of drunken, shouting smokers outside ballroom events or large weddings with very loud music which start in the early weekend mornings and wake up all the surrounding neighbours. Limiting the number of late night establishments concentrated in one area will reduce the attractiveness to anti social behaviour and crime and requiring premises that receive complaints about outside noise to have employees stationed to prevent this noise as a matter of standard policy will be a huge help to exhausted and fed up residents.</p>		
5	13/10/2020 20:38 PM ID: 150040177	<p>While cumulative impact is an important thing to measure and I would normally support such a policy, it is likely that the net result of the current pandemic when it ends will see fewer entertainment venues, particularly smaller ones, in operation. To put such restrictions in the way of new applicants to take over closed premises when they will not be contributing to an increase in footfall compared to pre-lockdown is unfair to applicants, will result in less choice for the public and negatively affect the local economy. It is also unlikely that even with the exact same number of venues open post-lockdown as there were pre-lockdown that footfall will be anything near the size it was pre-lockdown, owing to the public's reticence to enter such venues in the first place, a relative lack of disposable income and the predicted increase in the already extortionate cost of a night out in the West End. Putting further restrictions such as only licensing premises between 1000 and 2100 at this stage seems excessive and counterproductive.</p>		
6	15/10/2020 07:26 AM ID: 150175673	<p>Anything which helps to safeguard the 'quiet enjoyment' of homes against noisy night time activities is welcome.</p>		
7	24/10/2020 17:30 PM ID: 150975443	<p>many of the problems identified are linked to the high numbers of vagrants, beggars and rough sleepers in the area (as well as the number of licensed premises)</p>		
8	11/11/2020 17:19 PM ID: 152172014	<p>Section 14.26 of the ministerial guidance under s182 of the licensing act, in summary, requires the licensing authority to state that in one or more parts of it area it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives. From the evidence in the current CIA on data in March 2020 compared with the 2016 Statement of Licensing Policy (SLP) it shows that, despite the 2016 SLP containing a cumulative impact policy (CIP), decisions taken since that policy was put in place</p>		

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			Response Percent	Response Total
		<p>have not reduced or ameliorated cumulative impact in the West End Cumulative Impact Area(WECIA).</p> <p>In October 2015 there were 3,134 licensed premises in the whole of Westminster and in March 2020 3,076, a fall of 2%. In the WECIA there were 1,002 licensed premises and in March 2020 1,169 according to the Cumulative Impact Assessment an increase of 17%. In the Proposals for Revisions to the SLP it states a higher figure that there were 1304 licensed premises in March 2020, an increase of 30%.</p> <p>So in comparison with the rest of the City the number of premises is rising at a faster rate despite the existence of the CIP. Page 65 of the CI Assessment uses two measurement models to show that over the period studied every additional licensed premises increases the risk of adverse incidents in the vicinity of premises and across a wider area. So it is quite clear that decisions taken despite the 2016 CIP have failed to reduce cumulative impact and in designing a new CIP the wording and decisions taken in the light of it will need to be much more robust if it is to halt the continuing increase in cumulative impact and the erosion of residential amenity within the WECIA.</p> <p>However, the Covid 19 pandemic has concentrated the Council and licensing authority's mind, rightly in my view, not to bear down harshly whilst the pandemic has such an adverse effect on operating conditions for licensed premises and it would not in my view be in the best interest of the WECIA as a whole if the F&B industry was burdened by a tighter policy whilst operating conditions are so adverse and while public confidence in the sector is so dented. That said 5 years is a long time for the new SLP and I would like to see an explicit commitment from the licensing authority that it will keep the evidence under close review and if things return to the pre-Covid normal and that evidence of adverse cumulative impact start to emerge again the licensing sub-committee will take action to severely restrict the granting of new premises licences in the WECIA to ensure that it is actually promoting the licensing as set out in the S182 guidance.</p>		
9	12/11/2020 14:19 PM ID: 152273419	There is no proposal to introduce a Covid-19 specific policy to help businesses survive during the pandemic and subsequent recovery period. Where is the help?		
10	13/11/2020 12:17 PM ID: 152348366	<p>Heart of London supports the ambitions of a Cumulative Impact Policy in being able to effectively manage the evening and night-time economy. We also welcome the evidence-based approach to the proposed new Cumulative Impact Zone and new Special Consideration Zones to serve as a new intermediate step in the policy.</p> <p>Whilst we welcome the fact that new premises licences for pubs, bars and fast-food ,as well as music and dancing venues, will now be accepted within the CIZ, we consider that the proposed terminal hour for new licences of 9pm is too restrictive.</p>		

2. If you have any comments about the implementation of a Cumulative Impact Policy, please provide them below:

			Response Percent	Response Total
		<p>The experience of the 10pm curfew arising from Covid-19 has demonstrated what an impact an early terminal hour can have on the ability of BIDs, the local authority and other statutory partners to effectively manage the evening and night-time economy. Furthermore, given the West End is likely to have a significant number of vacant units due to the impact of Covid-19, we would encourage the council to consider a more flexible approach to the terminal hour of new licences which are granted in the West End CIZ, or at least to seek to further distinguish between the different uses, which may be drink-led or fast food-based; these would currently be treated the same under the proposals.</p> <p>In terms of the distinction between premises, we would also encourage Westminster to consider further flexibilities for those premises which are already trading successfully and have significant mitigation plans in place within the West End CIZ. For example, we are aware of fast-food premises which have previously sought to extend their licence the application has been refused. This is despite the premises being a responsible business which contributes to the local economy and local mitigation schemes such as 'My Local Bobby' and providing fast food and a safe place for visitors who have been in bars and pubs before they return home.</p>		
11	13/11/2020 13:02 PM ID: 152354533	<p>I am the Licensing Representative for the Knightsbridge Association and make the following comments on its behalf.</p> <p>The Knightsbridge Association thanks Westminster City Council for the opportunity to respond to the consultation on Licensing Policy and Cumulative Impact Assessment. In reviewing the policy we ask the Council to designate some or all of the Knightsbridge International Centre and environs as a Special Consideration Zone which would mean that businesses will only be granted new licences, or variations of their current licences if they can demonstrate how they will manage local issues, above and beyond what would normally be required.</p> <p>As background to our request, we note the following:</p> <ol style="list-style-type: none"> 1. The significant increase in recent years in the number of cafes, late night entertainment and tables and chairs on the pavement, especially on Brompton Road and in Knightsbridge Green. This has been accompanied by higher noise levels, with a negative impact on the quality of life for nearby residents. 2. The potential impact of the new planning use 'Class E' category, which removes traditional planning protections on change of use. One highly relevant and striking example of the potential impact of this change is the proposed 850 seat restaurant at Scotch House Corner (at the junction of Brompton Road and Knightsbridge), which if permitted will accentuate the trend of the area becoming a major night 		

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		<p>time destination. Another example is the possible conversion of the former Montpeliano's restaurant in Montpelier Street into a second, large restaurant / bar complex. If either of these developments were to proceed there would be significant implications for local transport capacity as well as an increase in crime and disorder, threats to public safety and public nuisance, the latter three being a breach of the objectives of the Licensing Act 2003. These risks would arise both during and outside 'core hours', i.e. after 11 p.m. The creation of a Special Consideration Zone would in our view substantially mitigate the impact of these developments if they were to proceed.</p> <p>If we have further comments we shall make them in a second posting to the Council's website.</p>		
12	13/11/2020 15:01 PM ID: 152367343	<p>The Westminster BIDs support the ambitions of a Cumulative Impact Policy in helping the local authority to manage the evening and night-time economy. We also welcome the evidence-based approach to the proposed new Cumulative Impact Zone and new Special Consideration Zones which serve as a new intermediate step in the policy. However, we do have some reservations about the data on which the policy changes have been based, particularly as some of it is now out of date and does not take into account the reduction in police resources allocated to Central London in recent years.</p> <p>Whilst we welcome the fact that new premises licences for pubs, bars and fast-food, as well as music and dancing venues, will be accepted within the CIZ, we consider that the proposed terminal hour for new licences of 9pm is too restrictive and would strongly recommend that this terminal hour is increased if we are to support the economic recovery of central London and recognise the role that the evening and night-time economy plays in this regard.</p> <p>The experience of the 10pm curfew arising from Covid-19 has demonstrated what an impact an early terminal hour can have on the ability of BIDs, the local authority and other statutory partners to effectively manage the evening and night-time economy. Furthermore, given the West End is likely to have a significant number of vacant units due to the impact of Covid-19, we would encourage the council to consider a more flexible approach to the terminal hour of new licences which are granted in the West End CIZ, or at least to seek to further distinguish between the different uses, which may be drink-led or fast food-based; these would currently be treated the same under the proposals.</p> <p>In terms of the distinction between premises, we would also encourage Westminster to bring forward further flexibilities for those premises which are already trading successfully and have significant mitigation plans in place within the West End CIZ. For example, permitting extensions of hours for well-run</p>		

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		<p>premises provided they actively contribute to local enforcement activities, have been well-run for a designated period of time and have a strong management plan in place. Such incentives and flexibilities would encourage premises to improve their management processes, participate in local enforcement initiatives and help contribute to the growth of the West End's economy as it emerges from the effects of Covid-19.</p> <p>We also believe that each application must be treated fairly and evenly in comparison to its neighbouring businesses, and must not have imposed different conditions or opening hours from its business neighbours so that they can compete on an even playing field. The fact that a neighbouring business might be attracting anti-social behaviour should not be used to discriminate against the applicant for an unconnected business. The impact assessment refers to problematic properties in an area and as a result it is unfair to impose strict conditions on a new business or well managed existing businesses simply because other businesses are causing problems.</p>		
13	13/11/2020 17:41 PM ID: 151148200	n/a		
14	14/11/2020 12:37 PM ID: 152424557	<p>The Northbank BID supports the implementation a Cumulative Impact Policy with accurate area evidence.</p> <p>We wish for this to be balanced with supporting the future growth of the hospitality sector in the Northbank area and to allow them flexibility to evolve and adapt to future challenges particularly in the recovery from Covid and its impacts. We wish to see how temporary changes bought in during this time can be adapted to be more permanent.</p> <p>We are yet to see the full impact of Covid on the hospitality sector for our area and support licensing policy which can help new businesses which may be needed to replace ones which have closed as a result of the pandemic. Footfall in the Northbank area has seen a drastic reduction and it may be some time before they return to pre-covid levels.</p> <p>We are also working to use the current window of opportunity to ensure a high standard of operation with partners including: neighbouring area BID's, Met Police, BTP, business members, and Safer Business Network, GLA and Amy Lane, Night Czar.</p> <p>We wish to encourage all support for the pubs, bars, restaurants, hotels and nightclubs, all of which make such a vital contribution to London's nightlife, making it a world class destination for international and domestic visitors.</p>		
15	14/11/2020 19:29 PM ID: 152448869	I think a Cumulative Impact Policy is detrimental to business. In the current climate of COVID restrictions businesses are struggling, particularly in the west end. A CIP		

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		<p>does not give any consideration for responsible businesses and operators who contribute significantly to the local economy and area. Businesses such as fast food restaurants offer a solution to the issue of vulnerable people who are out late at night. They do not sell alcohol but offer a place of refuge for people who have been in pubs/bars and had too much to drink.</p>		
16	15/11/2020 12:52 PM ID: 152468395	<p>We feel strongly that businesses need to have later closing times, outside seating and a Covid 19 specific policy to help all businesses survive the incredibly difficult trading conditions that currently prevail and may well prevail for the foreseeable future. Failure to implement a Covid 19 specific policy will see many businesses close.</p> <p>There is no new proposal to introduce external seating area policies. In light of the pandemic there needs to be more flexibility for businesses around external seating areas. The external seating areas need to be larger to properly allow for al fresco dining. Closing times need to be later than 10:00pm</p>		
17	15/11/2020 12:52 PM ID: 152470624	<p>A Cumulative Impact Policy (CIP) is based on data regarding existing issues. It seeks to prevent these issues increasing as a result of the grant of additional licences, or variations to existing ones. The data provided in the Cumulative Impact Assessment suggests that it has not been ineffective. Within the West End CIZ the number of licenses and the level of harm to the Licensing Objectives have both continued to increase, despite the existence of the CIP. This suggests that the CIP has not been effective in achieving its objective.</p> <p>We agree that a CIP should be implemented but believe that the Licensing Authority needs to take a more aggressive stance when considering applications so that fewer are granted. The presumption to refuse only applies to certain types of premises. If an applicant can demonstrate they are not one of these then they can frequently obtain a licence even if, in our opinion, they fail to demonstrate that they "they will not add to cumulative impact."</p> <p>In Camden, where the CGCA also makes Representations, the CIP says that the presumption applies to all new or variation application UNLESS they can demonstrate that they will not add to Cumulative Impact. There are some possible exemptions based on the style or size of operation, but our experience is that this make it more difficult to rebut the presumption than in Westminster. To avoid continuing harm to the Licensing Objectives in the CIZ we believe that WCC should take a similar approach. We have given a proposed wording in our response to Q15 of the survey.</p> <p>Because the CIP is based on backward looking data it is unable to prevent a Cumulative Impact arising in a new area caused by new applications being granted. The Special Consideration Zones have a role to play in preventing</p>		

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		Cumulative Impact arising but this requires a much more questioning attitude from the Licensing Authority when considering applications. See comments on SCZ's below.		
18	15/11/2020 13:44 PM ID: 152468159	I welcome the implementation of the CI Policy, as a long time Soho resident I am witness to the huge increase in food / beverage and drink led businesses which has completely changed the nature of the area. The year on year increase in the number of licensed premises and those that are granted past midnight has had a huge detrimental impact on residents. The current Cumulative Impact policy 2016 has failed to prevent further cumulative impact in the area, in fact this has increased over the years. The failure of the policy lies with its implementation, Licensing Sub-Committees regularly grant new and variation to licences outside core hours, WCC needs to take seriously their duty to promote the licensing objectives by effectively implementing the new policy and activity work to reduce CI in the area.		
19	15/11/2020 14:38 PM ID: 152475605	there needs to be a recognition of the effect of COVID and the aftermath which is missing and is pretty fundamental		
20	15/11/2020 15:28 PM ID: 151604949	<p>Due to the current COVID 19 global pandemic, we strongly feel that hospitality businesses should be supported due to so many having already closed and many facing insolvency. We appreciate this is not just a licensing issue and the ramifications of the epidemic, government restrictions and the general economic downturn are far-reaching. However, for the purposes of this consultation, it is crucial that Westminster look at the current state of the whole area and the West End.</p> <p>The proposal is to remove the Edgware Road and Bayswater CIP. We agree with this.</p> <p>In respect of the West End CIP - we believe this should be temporarily suspended with a review in the next couple of years to see what the fall out following the COVID 19 global Pandemic. The West End is the beacon that attracts people from all over the world. It is a sign that Britain is open for Business. More than ever, we need the West End to thrive as it will show to the world that we are world leaders. Westminster needs a vibrant and sustainable West End. It is the uniquely diverse offering that Westminster provides that makes operators attracted to Westminster. In the West End, large department stores sit next to independent boutiques. Nightclubs sit next to Artisan craft beer pubs. Michelin starred chefs sit along with local cafes. This diverse mix is what makes the West End special. Once this is lost it will be hard to recreate as businesses will not invest in the area. Therefore for the next two years - encouraging investment into Westminster must surely priority. Failure to encourage investment will lead to at best to bland high street offerings or at worst a deserted ghost town. For the first time in our lifetime, we have heard the</p>		

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		<p>West End as being described as Tumbleweed Town.</p> <p>Putting in a CIP based upon data prior to covid would be unreasonable and potentially dangerous unless there were certain safeguards. Eg a temporary relaxation for COVID or for a review mechanism in one to two years time. Businesses are fighting for their lives and if we do not encourage investment during this time then it could lead to the West End losing its uniqueness.</p> <p>Further, if a CIP is added, a Cumulative Impact Policy should aim to increase the quality of the operator within the Cumulative Impact Zone. Rather than simply imposing a presumption against the grant of new Premises Licences, the Policy should identify measures that can amount to exceptions such as:-</p> <ul style="list-style-type: none"> - granting licences for known good operators with established track records, - making licences ""personal"" to specific operators to ensure they are accountable - attracting investments into the city in a time of uncertainty and economic downturn eg new retail developments, hotels, theatres, restaurants, galleries etc - applications that can demonstrate that they are committed to improving the public realm at no cost to the taxpayer - eg extra security, street ambassadors, the running of local community liaison groups 		
21	15/11/2020 15:30 PM ID: 152165406	<p>While we agree that the Council should implement a Cumulative Impact Policy where this is supported by evidence, we are concerned at the present time about the potential impact of Cumulative Impact Policies to:</p> <ul style="list-style-type: none"> - potentially inhibit the future growth of hospitality businesses as they seek to recover from the devastating effects of the global pandemic, and - to deter new businesses from opening up in the Cumulative Impact Zone and replacing businesses which may have closed as a result of the health crisis. <p>Safer Business Network sits on the GLA Licensing and Regulation Group and the GLA High Street Co-ordination Group where the role of licensing policies in assisting the recovery of the hospitality sector has been under discussion in recent weeks. While we appreciate that an existing Cumulative Impact Policy has legal status and cannot simply be suspended, the discussions that we have had in these forums would suggest that guidance from Government on how Cumulative Impact Policies might be positively applied post Covid-19 would be helpful. It may be some time before visitor numbers to the West End recover to normal volumes, and as a result crime may not return to previous levels. This provides a window of opportunity for our work at Safer Business Network, through Safer WestEnd and our Safer Sounds Partnership, to tackle crime from a potentially lower base than usual, and to work with licensed premises to ensure training and high standards of operation. It is also an opportunity for WCC to consider how, via its application of its Licensing Policy and Cumulative Impact Policy, it can continue to support pubs, bars, restaurants, hotels and nightclubs, all of which make such a vital contribution</p>		

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		to London's nightlife, making it a world class destination for international and domestic visitors.		
22	15/11/2020 16:11 PM ID: 152478097	As result of global pandemic and the devastating effect this has had on the night time economy, any decision to further restrict the hours or ability to open new premises until after the full impact on businesses closing is fully determined. The last 20 years has seen the live music venues open in Westminster been decimated. The policy should at least clarify that grassroots live venues fall within the cultural section definition and also reconsider terminal hours policy to give flexibility for these space to utilise night tube and open longer hours to ensure that new venues open in the City of Westminster and allow the handful of existing venues survive.		
23	15/11/2020 16:19 PM ID: 152449399	<p>The CI policy has failed to reduce cumulative impact in Soho, indeed it has increased as can be seen from the excellent academic analysis.</p> <p>This is due in part because the decisions of licensing s-c's are often in variance to policies, thus negating them.</p> <p>Also the standard information given to s-c's is deficient because it fails to give cllrs the capacities of nearby premises thus preventing cllrs or officers assessing cumulative impact. These figures should appear in all reports & an example is the information provided by the Meard & Dean RA & the Soho Society for Royalty House (20/03127/LIPN) where it was difficult to obtain exact capacity figures as some were not on the licensing register which needs to be urgently remedied or how can WCC assess cumulative impact?</p> <p>This is compounded by the negative impact of the AI Fresco [policy which has greatly increased public nuisance in East Soho.</p>		
24	15/11/2020 17:12 PM ID: 152381378	I feel a cumulative impact policy should continue to be implemented within Soho (where I live), which has the highest number of food and beverage premises within Westminster, and also has the highest crime rates. This should be considered against any future application		
25	15/11/2020 17:34 PM ID: 152481404	It seems logical to identify areas where extra considerations need to be made but the problem arises with a fixed boundary resulting in a very different approach to an application that is just on one side, or just on the other, of that boundary. Each application must always be considered on its own merits so to have a different set of rules for two properties that could be on the same street can be unfairly punitive (or unfairly generous) if both are providing a similar offering at similar hours and feeding customers onto the same streets and same transport hubs. So a policy for an area does seem logical, but applying it to rigid boundaries does not.		
26	15/11/2020 17:59 PM ID: 152483731	While we have the Cumulative Impact Policy (CIP) implemented we should not lose sight of the cumulative Impact Zones (CIZ) , like Edgware Rd and more so Queensway and Bayswater. As the CIP presumption to refuse further licensing		

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		application would have no means of dealing with these localities particularly problems and issues.		
27	19/11/2020 11:32 AM ID: 152332620	<p>it should implement, but it must not then be used as a tool by WCC to decide which use classes can sit where..</p> <p>in light of use class changes, isnt the CIP completely at odds with what landlords/occupiers are freely available to do under planning.</p>		
28	19/11/2020 11:36 AM ID: 152316500	In my area there no problem with too many drinking establishments. The, fairly minor issue since we moved away from a main thoroughfare is the transport by foot mof people from one place to another, having forgotten to use the facilities to make their movement quieter and less stressful. Many of them seem to have no permanent homes. The general problem seems to be an ability for governing groups to make rules for other people without then providing enforcement for those rules.		
29	19/11/2020 11:43 AM ID: 152267599	We agree with this however believe the timing of the impact policy should be later.		
30	19/11/2020 13:24 PM ID: 150300014	<p>STOP Licensing strip clubs and other sex establishments - your current (SEV) policy seems to think 25 is suitable in one small area of the borough (Soho) - approx 12 of these are strip clubs. This cannot possibly be compatible with your LEGALLY BINDING public sector equality duty - which legally requires you to strive to ELIMINATE harassment, victimisation and discrimination of women and to FOSTER GOOD relations between the sexes. The entire strip industry is a hot bed of sexual harassment and assault. Most clubs operate as little more than brothels themselves (with sexual contact the norm) and as conduits for your many local brothels.</p> <p>We have worked for many years, alongside survivors of the strip and sex trade and have wealth of evidence showing how strip clubs really operate and they harm they do to lap dancers and women more widely. We have found reports of incidents (often serious) in over half the UK strip club industry. This includes many of Westminster's own strip clubs, They cannot be regulated - all measures every council has in place is routinely circumvented. You are in effect white washing a highly abusive industry with substantial links to organised crime - at huge cost to the tax payer.</p> <p>Their cumulative impact is huge.</p> <p>Post covid, the industry will seek to yet further expand and will be yet more abusive - full of desperate, poverty-stricken women and feeding even more brothels full of yet more desperate women.</p>		

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31	19/11/2020 13:27 PM ID: 150952251	Bear in mind residents and pedestrians		
			answered	31
			skipped	26

3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment? The summary of these findings can be found on pages 8-18 on this link.

			Response Percent	Response Total
1	Open-Ended Question		100.00%	32
1	12/10/2020 19:07 PM ID: 150000861	The consideration of the road closures and rerouting of traffic within Westminster will also affect the CIP and was not taken into consideration the plans of Westminster Council themselves with their directives on changing buses, road closures and direction of traffic.		
2	12/10/2020 19:42 PM ID: 150000476	There is no comparison to 5, 10, 20 years ago. Those of us who have been around for a while will remember significantly more night-time activity generally, yet on the whole fewer incidents of violence. It is beyond my personal ability to explain the potential reasons for that; however, one hypothesis could be a proportionately higher police (and other enforcement capacity) presence in the areas. For residents among us who know Westminster (and indeed Camden) police officers, we hear first-hand how few of them are available at weekends to patrol high-activity areas such as Soho, Covent Garden, and so on. Often this is single figures in the central part of the borough. This is of course beyond Westminster Council's power to address, as it is a function of cuts to police (both frontline and back office staff, as now frontline officers have to carry out much more in the way of admin functions than they ever did before) as well as some of the ways the police function these days (I've never met an officer who thinks Mi Investigation benefits victims!). Anyway, yes, back to the comment on the findings - it's interesting that the REASONS things are so problematic these days don't seem to have been investigated. We do need a healthy and robust night-time economy - but we need to take steps to ensure it can be safe as well as healthy and robust		
3	12/10/2020 19:44 PM ID: 150004612	This policy protects the residents and the environment. A recent rise in drug abuse and criminal activity can be controlled through this. The hospitality industry and families in residential areas have opposite interests in the late hours.		
4	12/10/2020 21:23 PM ID: 150008665	The fact that the rate of incidents per square kilometre observed in the assessment, as well as the rate of licensed premises per square kilometre was approximately 9 times than the borough's average rate is telling. For crimes in particular, the rate was 10–13 times higher between 6pm – 6am compared to the		

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			Response Percent	Response Total
		borough average. Again, a significant and worrying statistic. In effect, the licensing policy has increased crime and anti-social behaviour.		
5	13/10/2020 09:38 AM ID: 150020804	<p>It was mentioned that the work done in evaluating Mayfair was impacted by Covid. Was the work done to analyze Fitzrovia, Paddington, Marylebone/Oxford corridor, etc. also impacted by Covid, or is it felt that there is a good understanding of CIP in those areas?</p> <p>Why was an impact of approx. 4x not considered sufficient to continue to consider Edgware?</p>		
6	13/10/2020 12:47 PM ID: 150037782	Below the level of outright crime are negative impacts on residents such as begging, harrassment, pickpockets that are not reported, etc. The findings that Paddington and Queensway and Edgware Road fall below the CIA thresholds mean the thresholds are set too high. Even the local police have had trouble enforcing orders to reduce ASB in Queensway which has also a lot of neighbouring hostels used by Westminster Council to house young refugees or asylum seekers who are bored and hang out together in large groups in the streets. The combination of all these factors combine to create an environment which leads to problems for residents, even if one single premises alone cannot be identified as the cause. I think you should lower the threshold and also seek police input on where they have been experiencing many complaints, even if not prosecuted crimes.		
7	13/10/2020 20:38 PM ID: 150040177	<p>The findings seem to state that bigger venues are more likely to lead to the type of incidents that are causing concern; however, the implementation of the Cumulative Impact Policy as stated is more likely to lead to smaller venues becoming unviable. For example, anyone wishing to open a comedy or music venue with its own bar - not a type of venue listed as being among those to be of significant risk of such incidents, presumably because the presence of entertainment in a venue reduces the sort of circumstances where an incident could occur, but the very type of venue the West End had lost in some number prior to lockdown and is likely to lose further over the coming months - would not bother submitting an application because the venue would rarely be able to open to the public before 1900, so a 2100 closing time would be impractical. Yes, a new venue of any sort should be assessed, as they always have been, to determine what cumulative effect they might have upon the surrounding areas - and nobody wants a street of pub after club after restaurant after pub - but turning down all potential applicants on such draconian terms serves no logical purpose.</p> <p>That said, of course, very high concentrations of licensed premises on individual streets or blocks of streets, worsening crime hotspots, must continue to be considered all over the borough, not just in the West End. I note the comments about Victoria, although a lot of this is down to people from short-term lets, hotels</p>		

**3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment?
The summary of these findings can be found on pages 8-18 on this link.**

		Response Percent	Response Total
		<p>and hostels and/or the police's reluctance to deal with the small number of regular individuals repeatedly making people's lives a misery. It is nothing to do with those on a night out or long-term residents, nor the concentration of venues. My own view is that Victoria and the surrounding area could do with fewer restaurants, a couple more pubs (or those that close at weekends opening up for local residents, rather than just catering for office workers, civil servants, Parliamentarians etc.), and a wider variety of entertainment venues (i.e. we have theatres and cinemas we cannot afford, but if we want to see a band play we need to go to Camden, an areas where there are way too many of those venues, as well as others). Balance is the key, not density. Blanket licensing for new applicants should therefore be avoided.</p> <p>There is also, perhaps, a need to stop building new residential developments in noisier areas generally, be they in high-density entertainment, shopping and leisure areas, or close to transport hubs, railway lines, road interchanges, petrol stations etc. Every new build I've seen has been in an area that I would not consider residential. Also, I would venture that many of those who live in the areas most of concern have more than enough money to choose to move elsewhere if conditions are not to their liking or worsen in future - there still seems to be plenty of people prepared to trade off the considerable reduction in quality of life for a West End address - but I see no point in increasing residential capacity in an entertainment district and then complaining that there are too many entertainment venues for the number of residential units in the area. Those in areas with fewer venues who suffer exactly the same disruption or worse, either from local venues or caused by people making their way to or from the West End, often cannot afford to move. That is not to say that I do not have sympathy with those living in the West End zones - undoubtedly those who've lived in the area since the 1950s or 1960s have seen a number of changes, both positive and negative - but ultimately many have plenty more options than those of us on estates two miles or so from the West End.</p> <p>It is also important to look at whether the aesthetics or overall layout of a street, a block, an alleyway etc. are factors in the sort of disorder reported in the assessment. Approach the layout of the West End like you would a no-go housing estate suffering the same problems. This seemed to be the approach 20-30 years ago, particularly when Soho was being "cleaned up" and then, all of a sudden, was abandoned, to the point where the West End is even more cluttered than it was in the 1970s.</p>	
8	24/10/2020 17:30 PM ID: 150975443	<p>are the findings that there are more crimes recorded in areas where there are more licensed premises? if so it does not necessarily mean that one caused the other - the cause of the higher crime could be gangs, beggars being drawn to the high (wealthy) population density for example</p>	

**3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment?
The summary of these findings can be found on pages 8-18 on this link.**

			Response Percent	Response Total
9	27/10/2020 20:24 PM ID: 151167267	Better policing and security from the estates would bring down unsocial behaviour. Police and local enforcement teams should operate on a more preventative matter.		
10	11/11/2020 17:19 PM ID: 152172014	Please see comments above. In addition I welcome the fact that the CIA is so thorough and that the underlying evidence is made clear.		
11	12/11/2020 14:19 PM ID: 152273419	Basically my concern is, have you factored how businesses have been effected during the pandemic, and the continued survival to them.		
12	13/11/2020 12:17 PM ID: 152348366	<p>We welcome the extensive study which has been undertaken. As stated above, we would welcome additional information and data about the impact identified between different uses if they are remain in a single premises licence category under the new policy – for example the different impact between alcohol-led premises and those which provide fast food.</p> <p>Furthermore, as with other BIDs, we are also concerned that the Assessment and how it informs the approach to policies is based upon data which does not consider wider issues such as rough-sleeping or issues around transport hubs.</p> <p>We are also concerned that the findings around crime are out of context. Acquisitive crime in a tourist and business hotspot such as the West End is always going to be higher and requires the correct resources from the police, local authority and BID's to mitigate against it. The reduction of dedicated police resources in Leicester Square and surrounding areas has led to an increase in theft from the person and robbery offences despite the best efforts of responsible operators.</p>		
13	13/11/2020 13:02 PM ID: 152354533	We are broadly in agreement with the findings.		
14	13/11/2020 15:01 PM ID: 152367343	<p>We welcome the extensive study which has been undertaken. As stated above, we would nonetheless welcome additional information and data about the impact identified between different uses if they are remain in a single premises licence category under the new policy – for example the different impact between alcohol-led premises and those which provide fast food and ask the local authority to consider additional incentives for well-run premises to expand their operations in the future. In addition to our concerns outlined above about the timeliness of the data, we are also concerned about the fact that footfall is not overlaid when assessing Cumulative Impact.</p> <p>Within this context, our most significant concern is that the Assessment does not take into account other factors beyond licensable premises which may impact upon the findings and ultimately lead to areas such as the Strand and Victoria being designated as within Special Consideration Zones. In both of these areas,</p>		

**3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment?
The summary of these findings can be found on pages 8-18 on this link.**

			Response Percent	Response Total
		<p>there is high footfall and major travel hubs which are used by people departing the West End Cumulative Impact Zone and which also experience issues, such as rough-sleeping and soup-runs that in turn impact upon the findings of the Assessment. Similarly there is no recognition given to vice and prostitution (cards are put in telephone boxes on a more than daily basis) and we know that such activity is related to violent crime and drug offences in a much more significant way than to licensed premises. There is no mention of vice or prostitution in the CIA report.</p> <p>Specifically in relation to Edgware Road, we know that the area experiences gang related crime that spills over from north of the Marylebone Road and recorded incidents both here an on Oxford Street can also be attributed to events in Hyde Park.</p> <p>As a result, we would ask the authority to consider these wider issues, as it is otherwise unfair that licensed premises face additional restrictions in these areas.</p>		
15	13/11/2020 17:41 PM ID: 151148200	<p>We have the following views on the findings in regard to Victoria's designation as a Special Consideration Zone (SCZ):</p> <ul style="list-style-type: none"> - The evidence base presented in the Cumulative Impact Assessment (CIA) underpinning Victoria's designation as a SCZ is inconclusive and its interpretation put forward in the consultation document is open to question. Indeed, the CIA itself expresses concerns about the applicability of its data and findings to Victoria whilst Victoria's designation as a SCZ is contradictory with the data within the CIA. - Views of service experts and city inspectors suggest many of the patterns of incidents occurring in Victoria are attributable to travelling revellers coming into Victoria despite the increase in the number of licensed premises in Victoria in the last several years. - The CIA and consultation document also suggest the link between licensed premises and incidents in Victoria – which has not been designated as a Cumulative Impact Zone before – is weaker than in other areas. 		
16	14/11/2020 12:37 PM ID: 152424557	<p>We welcome the commitment of WCC to review the Cumulative Impact Policy and we also welcome the decision of WCC not to expand its current Cumulative Impact Zones in the current climate. Cumulative Impact Policies should be reviewed at a suitable time so that that they do not hamper the recovery of business and the hospitality.</p> <p>Both zone 1 and 2 are busy connections for rail, underground and bus routes so attract a higher proportion of people to them. The cause of incidents are driven by</p>		

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			Response Percent	Response Total
		<p>people travelling to the transport hubs and interchanges.</p> <p>The good transport links themselves, can attract issues and crime as it provides efficient and easy access and dispersal for those wishing to attaining drugs, which leads to other anti-social behaviour. This can be seen by the hotspots at Charing Cross Station and Embankment Station.</p>		
17	14/11/2020 17:50 PM ID: 152441492	We live in Berkeley street. The designation of Special Consideration Zone is a positive step for residents, although we are of the view it should be a cumulative impact area in its own right. The Hadfield Study in 2016 which suggested designation as a cumulative impact area for Berkeley street, had considerably more observational data.		
18	14/11/2020 17:57 PM ID: 152445317	We live in Berkeley street. The designation of Special Consideration Zone is a positive step for residents, although we are of the view it should be a cumulative impact area in its own right. The Hadfield Study in 2016 which suggested designation as a cumulative impact area for Berkeley street, had considerably more observational data.		
19	14/11/2020 19:29 PM ID: 152448869	The findings around crime are out of context. Acquisitive crime in a tourist and business hotspot such as the west end is always going to be higher and requires the correct resources from the police, local authority and BID's to mitigate against it. The withdrawal of dedicated police resources in Leicester Square and surrounding areas has led to an increase in theft from the person and robbery offences. CAG and other businesses have provided additional financial support to fund private security patrols. Due to lack of police resources private prosecutions have increased led by My Local Bobby the private security provider.		
20	15/11/2020 12:52 PM ID: 152468395	It is difficult to see how the findings relating to analysis done between 2017 and 2019 pre Covid19 can be relevant going forward without further research to include the effects that Covid 19 have had. These may well be long term effects.		
21	15/11/2020 12:52 PM ID: 152470624	We believe that the spatial analysis of the existing datasets is well explained and of a high standard. However there is a gap between the data arising from reporting and the experience of residents on the ground. Observational studies serve to fill this gap but this was, unfortunately, not possible for this assessment. This matters particularly in the case of public nuisance, especially noise from people in the street, as the rate at which this is reported will be low. This is because there is an understanding from residents that reporting it does not result in any action to stop it. As a result the Cumulative Impact Assessment reflects the Cumulative Impact on the Crime and Disorder Licensing Objective but NOT the Cumulative Impact on Public Nuisance.		
22	15/11/2020 13:44 PM ID: 152468159	It clearly demonstrates the year on year increase in CI in the West End, the key finding being that incidents between 6pm and 6am were 9x higher than the		

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			Response Percent	Response Total
		borough average, it has higher rates of all incidents, serious violent crime, robberies, theft, drug offences etc. Residents in Soho will not be surprised by these results, we are aware of how dangerous the area is especially at night. I agree with the statements that the granting of licences or variations would be inconsistent with their duty to promote the licensing objectives or their duty under the Licensing Act 2003.		
23	15/11/2020 15:28 PM ID: 151604949	The findings of the 2020 CI Assessment are of limited relevance in the wake of the COVID 19 epidemic. COVID is not simply a transient issue that will be gone in a matter of months leaving things as they were. It has already had a profound and substantial effect on the leisure and hospitality industry. The damage done will already take years to repair and COVID is still with us; only three days ago a second national lockdown was announced, with no sign of the curfew or social distancing requirements being lifted anytime after. Many businesses have already closed and with these new measures, many more will follow before we even reach the end of 2020. Given the annual ebb and flow of trade in L&H, any surviving businesses may well cease to be financially viable in the first three months of 2021. Further the Data relies heavily on assumptions on existing data collection methods and it not fully accurate. Moving forward - better data collection methods should be implemented, reviewed regularly and improved.		
24	15/11/2020 15:30 PM ID: 152165406	<p>We welcome the commitment of WCC to review the Cumulative Impact Policy earlier than the statutory 3 year requirement. Our view is that it should be revisited no later than one year from now, give the impact of the health crisis on hospitality businesses. We also welcome the decision of WCC not to expand its current Cumulative Impact Zones in the current climate.</p> <p>We acknowledge the evidence presented for retaining Cumulative Impact Zones in the West End for the time being, but as recognised in the Assessment, the health crisis has had a dramatic impact on levels of crime in the area since March 2020. While it is likely that crime will increase in due course as we eventually emerge from the height of the crisis, it may not return to Covid-19 levels immediately, and as highlighted above, there is an opportunity for our Safer WestEnd BCRP to work in partnership with businesses, the Police and the Council to ensure that perhaps it never does. The role of Cumulative Impact Policies in the aftermath of the crisis should be reviewed so that that they do not hamper business recovery. Overall, a more permissive approach to licensing, in the context of regeneration and growth, is needed over the next couple of years in order to retain existing businesses and also encourage new hospitality business start ups, which will be vital to the future of the industry and the provision of employment.</p> <p>In terms of the data, we would highlight that most crime and anti-social behaviour cannot be attributed to specific licensed premises. Reduced police resources also</p>		

**3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment?
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			Response Percent	Response Total
		has a bearing on crime levels as a whole. The role of organisations such as Safer Business Network/Safer WestEnd and BIDs in making public spaces safer should also be recognised.		
25	15/11/2020 16:11 PM ID: 152478097	It is impossible to review data without similar data for other central city locations, and especially in respect of Noise related complaints for on licensed premises whether these simply recorded or if there substantiated by qualified persons and whether if is the result of poor residential planning modelling.		
26	15/11/2020 16:19 PM ID: 152449399	We agree with the comments analysis made by the Soho Society. This Assessment is a damning report on the Council's failure to control cumulative impact. We cannot see that the revised policies are intended to deal with this situation, indeed in some respects the reverse appears to be the case. We would welcome a statement from the Council as to how the revised policies are aimed at reversing the many negative statistics in this Assessment.		
27	15/11/2020 17:12 PM ID: 152381378	The findings in relation to crime are alarming and show that there are too many premises in the area, combined with not enough police and council enforcement, leading to safety problems, particularly for those who are vulnerable, for whatever reason.		
28	15/11/2020 17:34 PM ID: 152481404	The findings are not conclusive and although there is a correlation between crime and the concentration of licensed premises these data are not detailed enough to conclude that licensed premises are the cause of crime. It is beyond question that a vibrant night-time economy drives footfall to an area, otherwise, it would not be by definition, vibrant. With that increased footfall comes an opportunity for increased criminal activity. More detailed analysis is required before simple conclusions can be made.		
29	15/11/2020 17:59 PM ID: 152483731	I certainly feel the Queensway and Bayswater and other Impact Zones should be maintained till we know actually the long-term impact on the Central London economy and jobs is felt after the pandemic.		
30	15/11/2020 21:44 PM ID: 152485251	Mayfair has a unique character and mix of residential streets, internationally renowned shopping, hotels, dining and entertainment. It is a small dense area and has licensed premises and transport nodes on all sides which lead to visitors often walking from one side to the other. Licensed uses have been on the increase in the area for many years and it has been identified in this and other reports that they are having a cumulative impact. Whilst statistics for all of Westminster have been collected, the area analysed is not the whole of Mayfair and the licensed premises in the area you study have an impact on the wider area of Mayfair. The neighbouring residential streets to the area of study are also bounded by a number of other clusters of licenses, still		

3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment? The summary of these findings can be found on pages 8-18 on this link.

			Response Percent	Response Total
		<p>within Mayfair, which add to the cumulative impact already experienced. We are also next to the West End Cumulative Impact Area which inevitably has an impact on Mayfair due to its close proximity and mix of similar uses.</p> <p>With the creation of the new Planning Use Class E, and the resultant loss of local control over the balance of uses, Licensing is now the only control mechanism for Local Authorities. This loss of control of use classes and the decline in retail could lead to a significant increase in the number of licensed premises in Mayfair.</p> <p>There is now a very strong argument for Cumulative Impact Area status for the Berkeley Street/Sq - Dover St area.</p>		
31	19/11/2020 11:32 AM ID: 152332620	are they findings? in light of covid-19, the year 2020 is not an ideal benchmark or a basis to form an opinion.		
32	19/11/2020 13:24 PM ID: 150300014	<p>There is not even any distinct analysis of SEVS (strip clubs) or other sex venues - SEVs are clubbed together under 'other'. Why? Clearly these are hot spots for drugs, sexual assaults (of lap dancers and women more generally), prostitution (on premises and fuelling it elsewhere), financial fraud and other crime - they are little more than a shop front for organised crime, as outlined above as has been shown many times in your own SEVs that you continue to relicense.</p> <p>The fact that this assessment does not look distinctly at venues that are clearly hotspots for breach of the PSED could in itself be seen as an unlawful breach of the PSED</p> <p>They also help create 'no go' zones - where women feel uncomfortable to go about their every day business - particularly when there is such a high concentration in such a small Soho area. This too is a breach of the council's legally binding public sector equality duty.</p> <p>We would welcome the opportunity to discuss the council's duties. We have taken two successful High Court cases against Sheffield City Council for breach of the PSED in relation to its pro sex industry stance. Westminster is even more open to Judicial Review.</p>		
			answered	32
			skipped	25

3. Proposed Revisions to Westminster City Council's Statement of Licensing Policy

4. The Licensing Authority aims to include its expectation that licensed premises, as part of their application process, demonstrate how they can promote inclusion in Westminster. Do you agree with the inclusion of this expectation?

									Response Percent	Response Total
1	Yes								69.64%	39
2	No opinion								14.29%	8
3	No								16.07%	9
Statistics	Minimum	1	Mean	1.46	Std. Deviation	0.76	Satisfaction Rate	23.21	answered	56
	Maximum	3	Variance	0.57	Std. Error	0.1			skipped	1

5. If you have any comments, please provide them below:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	22
1	12/10/2020 19:42 PM ID: 150000476	Westminster Council is not leading the way on inclusion, so how can it expect businesses to take it seriously? The council website is not fully accessible. The public realm is barely accessible. Black and minority ethnic residents as well as older and disabled residents are excluded from work opportunities in our borough. The onus shouldn't be on licensed premises to fix this.		
2	13/10/2020 09:38 AM ID: 150020804	Can be difficult to measure. How do you propose to make it easy for establishments to demonstrate?		
3	13/10/2020 12:47 PM ID: 150037782	There are plenty of laws governing this already. Too much regulation for small businesses is a burden and also hard to prove.		
4	13/10/2020 20:38 PM ID: 150040177	This is just extra bureaucracy and will not deter bigoted door staff or club owners from doing the sort of things you have mentioned, which we all know has happened and will continue to happen regardless of whether a licensee has made a written commitment or not. I prefer an approach of stricter recruitment, licensing and training for door staff, even to the point where perhaps the door staff are directly employed by the council, not the establishment - this would allow door staff to have a better appreciation of the whole of the borough's night-time economy rather than becoming over-familiar with the clientele of one particular establishment. Naturally, this must be linked with the severest of penalties for any establishment where it has been proven beyond all doubt that persons have been turned away purely on the basis of their skin colour, ethnicity etc. (To be honest, I tend to avoid anywhere that has door staff in the first place, although this is becoming increasingly difficult.)		

5. If you have any comments, please provide them below:

			Response Percent	Response Total
		<p>However, we must not let isolated incidents of prejudice by a small number of individuals who perhaps should not be holding licences in the first place to open the back door to a formal policy of inclusion, which would almost certainly be open to abuse and see decent venues suffer at the hands of overzealous and litigious individuals with a specific agenda.</p> <p>There will always be ""rough"" pubs or establishments that have an objectionable regular and if the landlord does not take action, for whatever reason, then those who object will always find somewhere else, particularly in an area with so many such establishments. Pubs have traditionally been a place where people can speak freely, and where the landlord has the final say when someone has overstepped the mark. If this doesn't please the millennials, then let them take their money elsewhere. The public as a whole must be allowed to have the final say as to whether any establishment is worthy of patronage purely by the virtue of their custom.</p> <p>I speak as someone who has been barred from a local pub for standing up to a particularly objectionable individual, albeit in a way that does not make me proud. The other party has not been barred, nor has his equally objectionable son. I understand they have continued to cause trouble, and that several other individuals have voted with their feet. Despite having a great affection for the landlord, his wife, their bar staff and most of the regulars, I have already told a mutual friend that I won't return to the establishment until a) I am invited back and b) the objectionable individuals are permanently barred. This has not happened in the 20 months to date, and with draught beer now at £6 a pint and myself jobless, I doubt it will ever happen, which is a great shame.</p>		
5	14/10/2020 01:08 AM ID: 150093041	The Bureaucratic imbecile who formulated the convoluted and purposefully confusing questionnaire should be sacked!		
6	16/10/2020 14:12 PM ID: 150290791	Inclusion in Westminster should also include space for residents to securely park their bicycles.		
7	24/10/2020 17:30 PM ID: 150975443	you should spell out what you mean by inclusion in the question - are you talking about quotas, or aims or targets or what specifically		
8	11/11/2020 17:19 PM ID: 152172014	It is not just on the subject of promoting inclusion that the licensing authority (LA) should ask and expect applicants to set out either in their proposed operating schedule or in other documents accompanying the application how they will meet all 4 of the licensing objectives. Some applicants and/or their advisors are reluctant to set out clearly how their application can demonstrate that it will promote the licensing objectives and the policy criteria attached to them. I recognise that the legislation does not allow the LA to require more detail but if it is apparent to the licensing service that applicants are using the absence of detail in their application		

5. If you have any comments, please provide them below:

			Response Percent	Response Total
		or the delay in supplying it until the last moment as tactics to prevent scrutiny and negotiation on the details of how the licensing objectives will be promoted and the conditions therefore necessary to secure this then the LA through its licensing sub committee to make that displeasure very clear in order to bear down on this type of behaviour.		
9	13/11/2020 12:17 PM ID: 152348366	Yes, we strongly welcome this objective and all premises should seek to provide an inclusive, safe and welcoming experience to all patrons.		
10	13/11/2020 15:01 PM ID: 152367343	Yes, we strongly welcome this objective and actively encourage premises who are members of our BIDs to provide an inclusive, safe and welcoming experience to all patrons. An ambition which is consistent with our objective to continue to promote London as a global destination and City. We would also welcome further information, guidance and training to be made available to help support and promote inclusion as outlined in the policy.		
11	13/11/2020 15:51 PM ID: 152367683	Such inclusion will only be appropriate insofar as it impinges directly on the promotion of the licensing objectives		
12	13/11/2020 17:34 PM ID: 152298169	I agree with the need to demonstrate how they will promote inclusion for all, including those with disabilities, but not clear how this can be done for race or other protected characteristics. While the document mentions the need for training of door staff and other customer facing personnel, there are cases when management have given instruction to door staff and customer facing personnel on the type of clients they want frequenting their establishment. It is not clear how the policy of no discrimination is to be policed / enforced. Are there penalties if it can be evidenced that someone was excluded due to discrimination?		
13	13/11/2020 17:41 PM ID: 151148200	n/a		
14	14/11/2020 12:37 PM ID: 152424557	The Northbank BID supports inclusivity with its member organisations and is currently reviewing how to enhance this.		
15	15/11/2020 13:44 PM ID: 152468159	None		
16	15/11/2020 15:30 PM ID: 152165406	Safer Business Network would be happy to work with businesses in its Safer WestEnd BCRP to ensure that they promote inclusion.		
17	15/11/2020 16:11 PM ID: 152478097	This is a positive message and a field that live music venues and night clubs specialise in, if it is therefore a shame that Westminster Council does not support these sectors both in practical terms and in this policy document.		
18	15/11/2020 16:19 PM ID: 152449399	None.		

5. If you have any comments, please provide them below:

			Response Percent	Response Total
19	15/11/2020 17:12 PM ID: 152381378	None		
20	15/11/2020 17:59 PM ID: 152483731	It is good to see the promotion of inclusion in night-time economy in Westminster licensing regime as the Council has statutory responsibilities from the Equality Act and also it has been highlighted as an issue by the media that we need to address so as all can enjoy the hospitality and entertainment sector.		
21	19/11/2020 11:32 AM ID: 152332620	isnt this a given but another hurdle of licence holders to try and satisfy with words, when actions ultimately speak louder.		
22	19/11/2020 13:24 PM ID: 150300014	The sex industry is the antithesis of inclusion - it actively excludes women from feeling safe, comfortable or welcome. And it actively promotes deeply harmful, stereotyping and abusive attitudes -the opposite of inclusion		
			answered	22
			skipped	35

4. B. Summary of the Cumulative Impact Assessment Findings

6. Do you agree with the proposal to include a summary of the 2020 Cumulative Impact Assessment?

									Response Percent	Response Total
1	Yes								69.09%	38
2	No opinion								12.73%	7
3	No								18.18%	10
Statistics	Minimum	1	Mean	1.49	Std. Deviation	0.78	Satisfaction Rate	24.55	answered	55
	Maximum	3	Variance	0.61	Std. Error	0.11			skipped	2

7. If you have any comments, please provide them below:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	23

7. If you have any comments, please provide them below:

			Response Percent	Response Total
1	12/10/2020 19:07 PM ID: 150000861	However the plans and directives of Westminster council on these areas were not part of the 2020 CIA		
2	12/10/2020 19:42 PM ID: 150000476	It doesn't examine the issues in much detail so a summary may not be all that worthwhile.		
3	12/10/2020 21:23 PM ID: 150008665	What does this actually mean: ""Do you agree with the proposal to include a summary of the 2020 Cumulative Impact Assessment? "" Why would anyone not agree to including the assessment as a piece of information.		
4	13/10/2020 20:38 PM ID: 150040177	The wording needs to be simplified and/or bulletpointed, so it is aimed more at the general public. The inclusion of tables and diagrams always helps further understand the text, so don't lose those.		
5	14/10/2020 01:08 AM ID: 150093041	My god what an awful questionnaire! Try and ask basic questions to actually get the true answer from the public		
6	24/10/2020 17:30 PM ID: 150975443	don't understand the question - include a summary of the 2020 Cumulative Impact Assessment? - include it in what????		
7	11/11/2020 17:19 PM ID: 152172014	I welcome this.		
8	12/11/2020 14:19 PM ID: 152273419	There is no proposal to introduce new external seating area policies. We are suggesting new policies allowing increased flexibility for larger seating areas and later hours to promote consistency with the alfresco dining schemes. The increased importance of external areas in light of the pandemic		
9	13/11/2020 12:17 PM ID: 152348366	See above in terms of the distinction between different premises and how we believe this should be taken into account in emerging policy.		
10	13/11/2020 15:01 PM ID: 152367343	See above comments regarding the distinction between different premises and other issues which we believe should be taken into account when bringing forward policies for the Cumulative Impact Zone and Special Consideration Zones.		
11	13/11/2020 17:34 PM ID: 152298169	Gives context for the proposed changes though alternatively a reference to the summary could be provided.		
12	13/11/2020 17:41 PM ID: 151148200	n/a		
13	14/11/2020 12:37 PM ID: 152424557	n/a		
14	14/11/2020 17:50 PM ID: 152441492	We live in Berkeley street. Although we agree with the overall assessment, we believe the Hadfield Study in 2016 better reflected the issues in Berkeley street, and had considerably more observational data.		

7. If you have any comments, please provide them below:

			Response Percent	Response Total
15	14/11/2020 17:57 PM ID: 152445317	We live in Berkeley street. Although we agree with the overall assessment, we believe the Hadfield Study in 2016 better reflected the issues in Berkeley street, and had considerably more observational data.		
16	14/11/2020 19:29 PM ID: 152448869	The summary is too generic and does not specify or factor in the premises that have operated irresponsibly and contributed negatively to the Cumulative Impact Assessment. By including every licenced premises within the zone the CIA does not therefore treat each business and operator on a case by case basis and on merit as it states it should do within the Cumulative Impact Policy. The crime stats in 2020 are significantly lower mainly due to COVID and with the low footfall and visitor numbers which are likely to be in the West End well into 2021 the impact of crime is likely to be significantly less than what it was in previous years.		
17	15/11/2020 12:52 PM ID: 152470624	In the summary please include a caveat regarding the absence of the observational study and therefore the lack of data on the actual, as opposed to the reported, level of Public Nuisance.		
18	15/11/2020 13:44 PM ID: 152468159	The findings of the CI in the West End is damning and it clearly states granting further licences would be inconsistent with the authority's duty under the Licensing Act, it supported further policy restrictions, however, it is going this and decided not to impose any new restrictions, citing COVID as the reason and considers this will not impact on the Council's duty to promote the Licensing Objectives. This decision cannot be justified, the CI is 9x higher in the West End, this is an opportunity for WCC to reduce the level of CI to a more acceptable level, rather than acknowledge it is high and then do nothing proactive about it apart from granting more licences.		
19	15/11/2020 15:28 PM ID: 151604949	As noted above, the 2020 CIA is simply not relevant following the ongoing impact of COVID. This is not a temporary matter that will leave the industry as it was before March 2020. The industry is already permanently changed and becomes ever more damaged as time goes on. New data must be collected immediately so that we can know the full impact of COVID 19 epidemic and that Westminster can respond appropriately.		
20	15/11/2020 16:11 PM ID: 152478097	I think the policy review should wait until after the impacts of the Covid pandemic, and that at minimum the existing policy should be adopted for an interim period.		
21	15/11/2020 16:19 PM ID: 152449399	For the reasons set out in 3 above. 4.7 'It is believed that this approach, at this time, will not impact the Council's duty to promote the Licensing Objectives. However, as the city recovers, visitor numbers increase, and associated incidents rise outside the current West End Cumulative Impact Zone, the Licensing Authority will review this approach.' We strongly disagree with using Covid as an excuse not to deal with the increase of CI in these areas, and indeed the Council's willingness to entertain granting further licenses & thus exacerbating CI. Also the grant of more licenses will have a		

7. If you have any comments, please provide them below:

			Response Percent	Response Total
		negative impact on existing licensed premises thus contradicting WCC's own (incorrect) logic.		
22	15/11/2020 17:12 PM ID: 152381378	The finding are fairly dramatic and WCC cannot ignore them.		
23	15/11/2020 21:44 PM ID: 152485251	We do not support all the findings, comments in 3 above.		
			answered	23
			skipped	34

5. C. Revised framework for the Licensing Objectives policies CD1, PS1 and PN1

8. Do you agree with the proposed changes to the Licensing Objectives policies CD1, PS1 and PN1? This includes their criteria and considerations, listed in clauses B of each policy.

									Response Percent	Response Total
1	Yes								56.14%	32
2	No opinion								22.81%	13
3	No								21.05%	12
Statistics	Minimum	1	Mean	1.65	Std. Deviation	0.81	Satisfaction Rate	32.46	answered	57
	Maximum	3	Variance	0.65	Std. Error	0.11			skipped	0

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	23
1	12/10/2020 19:07 PM ID: 150000861	But the directives and changes being made by Westminster Council in these areas needs to also be included...		
2	12/10/2020 19:42 PM ID: 150000476	CD1 - Placing so much responsibility on licensed premises ignores the many reasons people feel the need to drink excessively and get violent in the first place. Very few happy fulfilled people get trashed and commit crimes. Those problems		

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
		<p>are societal, and can't be fixed by licensed premises; to place those conditions upon licenses means that licenses will inevitably be withdrawn - or people won't want to go to places where they're forced to act like they're in work or school instead of letting their hair down and having fun, so places will close through insufficient custom. Have Westminster not learnt lessons from other London boroughs who have done this very same thing and seen their night-time economies tank?</p> <p>PS1 - seems sensible. No contention from here.</p> <p>PN1 - largely sensible too. As above, no contention.</p>		
3	13/10/2020 12:47 PM ID: 150037782	I strongly welcome the policies in PN1 and hope that these will be enforced if there is non-compliance after the license has been granted.		
4	13/10/2020 20:38 PM ID: 150040177	<p>I don't see the point of the alteration in the wording. Most of the existing criteria that need to be satisfied and the considerations that need to be taken into account make perfect sense as they stand. My only view on the policies as they are detailed in the proposal are as follows:</p> <p>CD1 / PS1: There should be a greater emphasis placed on the interior layout, access and relative space allocated to seating and standing, but landlords and venue owners need to be assisted by the council in putting changes into effect rather than penalized. For example, the previous landlord of the pub from which I have since been barred was often criticized for the poor positioning of the TV screens used by patrons for watching sporting events. We suggested suspending two larger flat screens back-to-back from a central beam, so that all customers had a clear line of sight. He said the expense could not be justified because of all the licensing requirements and other overheads. Later, when he had left and the pub was fully refurbished, the number of screens increased but remained the same size, with two in virtually the same place as before. As a result, people who stood or moved to/from the bar or toilets often obscured the clear view of those sitting, and that in itself caused several arguments over time, most of which thankfully did not escalate into anything more serious. It's a small pub and there aren't a lot of options, but I'm sure current and future landlords of this and other similar sized establishments would appreciate a more proactive and collaborative approach from the council.</p> <p>PS1 / PN1: The policies cover everything for most venues, particularly larger purpose-built establishments such as clubs and cinemas. However, it's difficult to see what many smaller pubs could do to make anything safer, purely because many are in historic, protected or listed buildings to which they cannot readily make alterations such as the widening of entrances and exits or anything internal</p>		

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
		<p>to reduce crowding (other than, of course, chucking out all furniture, which then makes the establishment less inclusive to the elderly and disabled, who need access to such places more than anyone else in society). It should also be noted that dedicated policies for readmission in clubs and music venues are still not common, even now, several years after the smoking ban came into place. Indeed, dedicated smoking and vaping areas outside pubs and smaller venues are often now more crowded than the interiors, which obviously affects passers-by just as much as a venue's clientele. There are even several music and club venues across London that put more emphasis on having someone demanding £1 or more for a squirt of Carex and a square of kitchen roll (rather than having washing and drying facilities freely available) every time a patron needs to go to the toilet. I can see this being adopted widely post-lockdown, causing far more unrest among paying customers than most other issues listed amongst your policies. Clearly, it will also result in public hygiene going back out the window again as well.</p> <p>PN1: Again, everything seems rather sensible. However, more emphasis should be placed on the noise extractor fans make at take-aways, many of which are near residential premises of one sort or another. I also feel that lip service is paid when it comes to all premises - not just licensed ones - blocking pavements. As part of the council's attempts to make my area more "villagey" (a ridiculous concept in central London), several streets are now single-file for pedestrians thanks to cafes being granted outdoor seating where there is not enough space and retail outlets being permitted to display A-boards where there is little benefit in doing so. When this is added to the encroachment on walking space of recent cycling initiatives (docking stations for so-called Boris Bikes, the proliferation of electric hire bikes dumped wherever the last user felt like dumping them, the frankly dangerous cycle lanes such as those towards the bridge end of Vauxhall Bridge Road that were put in place when cyclists refused to use the existing cycle lanes installed at great expense at their demand and kept riding on the pavement anyway, etc.), pedestrians - particularly those with sight or mobility difficulties - are most definitely considered last. Social distancing in these areas is also impossible and has led to pedestrians walking in the middle of the road. So anything that makes the pavements easier for pedestrians, the very people for whom they were intended, is welcome, but don't for a minute think it's solely an issue for licensed premises.</p>		
5	14/10/2020 01:08 AM ID: 150093041	Wow		
6	24/10/2020 17:30 PM ID: 150975443	The proposals are far too subjective and checklist driven. You will stifle any entrepreneurship with such an approach. You need - especially with so many places closing - to encourage people to have a go at opening an establishment. Then you need to monitor the new premises and see if there are any problems. If there are not: do nothing. If there are: help them with advice etc. If the breaches		

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
		really, really persist withdraw the license. Otherwise you will just get sterile chain based floodlit zero-ambiance places applying to open. Obviously you have to only allow someone to open in a premises that is designated for the purpose.		
7	11/11/2020 15:38 PM ID: 152194841	<p>I believe that changes to and operation of PN1 just take account of increased events activity especially when combined with the extension of core hours. The combined effect of these things is likely to lead to permissions being available for activity which significantly increases noise and other nuisance well after core hours. This is because events, whether under a licence, a TEN or other permission, tend to have a much greater need for ancillary loading and unloading activity. Mitigation measures are of limited effect because the time and location of the loading and unloading are often directly linked to permitted activities. Current conditions of PN1 include:</p> <p>(e) minimise and control noise from staff, contractors and suppliers and their activities; and</p> <p>(f) minimise and control noise from vehicles associated with and providing services to the premises or open air site and their customers</p> <p>but policy and Committees will need to consider much more stringent and verifiable conditions where the cumulative number of events increases as a direct result of changing commercial opportunities, the increase in core hours and the likelihood of venues never or rarely previously hosting such activities now doing so often. Loading and unloading after 11pm can be very disruptive indeed and very hard to act on at the time. Resorting to licence reviews demands many disruptions be suffered and is always an unequal fight between paid employees and unpaid residents seeking only to protect amenity. Strict conditions (like but not limited to those set for the Marriott Hotel (20/03534/LIPN) should be promoted.</p>		
8	11/11/2020 17:19 PM ID: 152172014	<p>I welcome the wording of Clause A and B in CD1. I do not agree with the way Criteria 1 is worded as it is confusing and does not put sufficient onus on the applicant to show they have taken the Considerations into account.</p> <p>I propose that after '....the applicant' the word 'of' is removed and the following words are inserted 'which takes account of all the relevant Considerations below to reduce the'</p> <p>I welcome Clause A and B of PS1. I do not support the current wording of Criteria 1 which should be strengthened as follows: After 'Licensing Authority, that' insert the words 'show the relevant considerations have been fully considered to'.....</p>		

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
		I welcome Clause A and B of PN1. I do not support the current wording of Criteria1 which is strengthened if the word 'could' is replaced with 'would'.		
9	13/11/2020 12:17 PM ID: 152348366	Whilst we accept the need to maintain control of the external environment there should be a greater clarity on what premises are expected to maintain and control and where the outside area ceases to be under their jurisdiction.		
10	13/11/2020 15:51 PM ID: 152367683	CD1 B:6 The imposition of a CCTV condition should be imposed only where justifiable in preventing crime (and it is questionable whether assisting police in the prosecution of offenders falls within this definition). Any condition that is imposed requiring images to be given to a third party should be subject to the Data Protection legislation.		
11	13/11/2020 17:34 PM ID: 152298169	PS1 9 - What medical & other emergencies are you expecting them to cover - heart attacks, epileptic seizures, allergic reactions?		
12	13/11/2020 17:41 PM ID: 151148200	n/a		
13	14/11/2020 12:37 PM ID: 152424557	n/a		
14	14/11/2020 19:29 PM ID: 152448869	<p>Although I agree with the majority of points, PN1 point 3 subsection (n) talks about identifying the need to control customers congregating in outdoor areas to smoke, consume food or drink (whether supplied from the premises or not).</p> <p>Whilst I accept the need to maintain control of the external environment there should be a greater clarity on what the premises is expected to maintain and control and where the outside area ceases to be under their jurisdiction.</p>		
15	15/11/2020 12:52 PM ID: 152470624	<p>General</p> <p>The new structure of these policies is good, with objective, criteria and considerations listed. We believe that there is an urgent need to update the Model Conditions to reflect this structure, with MC's available to cover all of the "considerations" in the Policy.</p> <p>CD1</p> <p>The word significant in the criteria should be removed. The Licensing Objective is the PREVENTION of crime and disorder. The criteria should be whether the premises will reduce, or at worst leave the same, the level. Allow a premises to contribute to Crime and Disorder, as long as it is not significantly, leaves too much room for argument in hearings and appeals. This is especially an issue in areas, such as the CIA's, where the existing level is already high. It makes it easier for an applicant to argue that they will not make a significant contribution in that area, because of the existing high level.</p>		

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
		<p>PS1 The impact of customers outside the premises, such as on the pavement outside, should be taken into account. The fact that pedestrians have to walk in the roadway to pass customers standing on the pavement is a Public Safety issue.</p> <p>PN1 One of the main issues for residents associated with licensed premises is dispersal. Although the benefit of dispersal policies is mentioned in the narrative for HRS1 we believe that all premises need to have considered the need for a dispersal policy. The relevant consideration is PN1 3(d)</p> <p>Minimising and controlling noise from customers arriving at the premises, or open-air site outside it and departing from it</p> <p>This should include a reference to dispersal, such as below.</p> <p>Minimising and controlling noise from customers arriving at the premises, or open-air site outside it and departing from it, including how dispersal is managed</p>		
16	15/11/2020 13:44 PM ID: 152468159	In general, I request the Operating Schedules should contain more detailed information about the operation, when responding to licensing applications it is difficult to understand the true nature of the operation and how it will function. Prevention of Public Nuisance Policy PN1; I disagree with the addition of the words 'unless there are exceptional reasons for granting longer hours', I would suggest the current wording 'are generally restricted to 23:00 ' is sufficient. I would not want to see Soho turned into a late night outdoor eating and drinking destination, the area is already extremely noisy during the late evening and into the night, it does not need the addition of tables and chairs past 23:00 which will also attract criminal activity. Residents need to be able to sleep.		
17	15/11/2020 15:30 PM ID: 152165406	Safer Business Network will work with premises through our Safer Sounds Partnership to ensure that they are continually aware of their obligations under the licensing objectives.		
18	15/11/2020 16:11 PM ID: 152478097	None		
19	15/11/2020 16:19 PM ID: 152449399	These policies rely on applicants providing the necessary information in their Operating Schedule. As was apparent with 20/03127/LIPN when those making Representations requested such information in the Operating Schedule officers ruled this out of order - see attachments. As was the case under the Justices late submissions should not be allowed at hearings & should be sent at least 7 days in advance.		

9. If you have any comments about policies CD1, PS1 and PN1, please provide them below and state the policies and specific aspects that you are referring to:

			Response Percent	Response Total
		In CD1 there is no definition of 'adequate risk assessment' and what is needed should be stated; In PN1 we object to 'seating for the use of customers on the public highway and these are generally restricted to before 23:00 in Westminster unless there are exceptional reasons for granting longer hours'. Hitherto there has been a limit at 23.00 and this should remain as it contradicts the Prevention of Public Nuisance .		
20	15/11/2020 17:12 PM ID: 152381378	The importance of the Operating Schedule is a key theme throughout these policies,. It seems there is often a lack of information by applicants on the operation of premises. which should be addressed. It's very often difficult for residents, without sufficient knowledge of the WCC policies, to comment properly on applications (all three above)		
21	15/11/2020 17:34 PM ID: 152481404	Re: PN1 The revised wording, as the previous SLP, introduces vague terminology. The licensing objective is very specifically the prevention of PUBLIC nuisance. Within the proposed criteria and considerations wording for PN1 the term "public nuisance" is variously interchanged with "nuisance" (para 1); "may cause disturbance" (para 2); "noise that could affect people" (para 3c); and "prevent disturbance" (para 3o). These terms go beyond the licensing objective of the prevention of public nuisance.		
22	15/11/2020 17:59 PM ID: 152483731	These subtle changes to preventing crime & disorder; public safety and public nuisance with more emphasis under the Act will require a lot more public information in licensing decisions.		
23	19/11/2020 13:24 PM ID: 150300014	Can't find this - you should give link and page no		
			answered	23
			skipped	34

6. D. Amended framework for the Protection of Children from Harm Policy - CH1

10. Do you agree with the proposed changes to the framework of the Protection of Children from Harm Policy (CH1), including its criteria and considerations?

			Response Percent	Response Total
1	Yes		70.18%	40
2	No opinion		22.81%	13
3	No		7.02%	4

10. Do you agree with the proposed changes to the framework of the Protection of Children from Harm Policy (CH1), including its criteria and considerations?

									Response Percent	Response Total
Statistics	Minimum	1	Mean	1.37	Std. Deviation	0.61	Satisfaction Rate	18.42	answered	57
	Maximum	3	Variance	0.37	Std. Error	0.08			skipped	0

11. Do you agree with the inclusion of the safeguarding of children as a key policy consideration within the Protection of Children from Harm Licensing Objectives?

				Response Percent	Response Total					
1	Yes			70.18%	40					
2	No opinion			22.81%	13					
3	No			7.02%	4					
Statistics	Minimum	1	Mean	1.37	Std. Deviation	0.61	Satisfaction Rate	18.42	answered	57
	Maximum	3	Variance	0.37	Std. Error	0.08			skipped	0

12. If you have any comments about the proposed changes to policy CH1, please provide them below and state the aspects that you are referring to:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	14
1	12/10/2020 19:07 PM ID: 150000861	Again the changes and directives of Westminster Council needs to also be included		
2	12/10/2020 19:42 PM ID: 150000476	CH1 C. 9. "heavy" or "binge" drinking - ought to be removed. Not all licensed premises SHOULD be suitable for children - heavy or binge drinking is literally one of the biggest markets for premises in some areas of Westminster so to include this as an essential criterion is to force them to become unattractive to the Thursday and Friday night after-work adult crowds as well as the Saturday-night-out adult crowd. I'm a Westminster parent and I definitely don't want every licensed establishment in our borough to be the boring and mundane type of place I'm happy to take my young child! Party atmospheres and adult socialising, which are a significant part of our night-time economy's attractiveness to young professionals who live in Westminster and outside of it are lubricated by heavy drinking. Despite not being a heavy drinker myself, and not wanting to actively encourage it in others - I recognise that. So I find it remarkable that those who developed this policy		

12. If you have any comments about the proposed changes to policy CH1, please provide them below and state the aspects that you are referring to:

			Response Percent	Response Total
		appear to be ignorant of it. Safeguarding children is an admirable aim, but making licensing conditional upon there not being heavy or binge drinking on the premises is going to garrotte premises who don't want children in their premises but are glad of their drunken adult cohort who help them stay in business.		
3	13/10/2020 20:38 PM ID: 150040177	<p>Nobody under the age of 18 should be permitted in any licensed premises. I am tired of going into pubs to have a drink with friends and having to put up with misbehaving toddlers and screaming babies, or worse still being told to watch my language because ""there are kids around"". It's a pub, and these people should either deal with it or take their families somewhere else. They're just as bad as teenagers who want to be big and clever by trying to get served in pubs but are not prepared to take any responsibility (which is what those of us who went drinking at 16 and 17 in the days before teenagers weren't carded did as a matter of course). That said, students aged between 18 and 21 can be just as bad, but I don't want the legal drinking age to be changed. I just wish adults could rely upon pubs, clubs and other adult-oriented establishments being places where they can completely get away from kids for a few hours. I'm fed up with families taking their kids into pubs in London because ""there is nothing else for us to do as a family"" - and adults who think that way really shouldn't consider becoming parents until they're prepared to be much less selfish. And at least then bar or other venue staff wouldn't be expected to be on the look out for signs of abuse. They are not social workers, they are not paid to be social workers and, furthermore, they enjoy none of the legal protections of social workers, so don't expect that of them.</p> <p>As for child protection and safeguarding in family-friendly venues such as theatres or cinemas, or adult-oriented venues that may open during the daytime for other uses, I really have no opinion. I would only advise you to listen to a range of sources when it comes to drawing up such guidelines, because the NSPCC - which has forced a lot of this tedious legislation onto the statute books unopposed - is part of the problem, not the solution, and I wouldn't trust their opinion one bit.</p>		
4	14/10/2020 01:08 AM ID: 150093041	You are bloody idiots		
5	24/10/2020 17:30 PM ID: 150975443	I am not convinced you should burden bar, restaurant etc. operators with these changes despite there obvious good intention.		
6	11/11/2020 17:19 PM ID: 152172014	I welcome the simplicity and clarity of approach for this objective.		
7	13/11/2020 15:01 PM ID: 152367343	As outlined above, we would welcome the local authority offering training and guidance from businesses on safeguarding to ensure that they can meet the additional policy consideration.		

12. If you have any comments about the proposed changes to policy CH1, please provide them below and state the aspects that you are referring to:

			Response Percent	Response Total
8	13/11/2020 17:34 PM ID: 152298169	<p>1) Consideration 2 is not very clear on two aspects: ""Whether there are effective measures to check the age of those young people who appear under 21, or under 25, to ensure that alcohol is not sold to those under 18 and that those under 16 are accompanied in alcohol led premises (see Appendix X). ""</p> <p>a. when is under 21 or under 25 relevant? Should it be worded ""Whether there are effective measures to check the age of those young people who appear under 18...""</p> <p>b. The sentence implies that anyone under 16 can be accompanied by someone of any age - ie 16 and over. Is that the intent?</p> <p>2) Consideration 7 - ""Whether there are adequate procedures for identifying unaccompanied or lost children and ensuring that they are kept safe and adequately supervised until they can be handed over to a responsible adult. "" As per my comment above, the present wording does not require anyone under 16 to be accompanied by an adult - no age is specified.</p> <p>3) Consideration 9 - ""Whether there is evidence of heavy, binge or underage drinking on the premises. "" There is no mention of drugs or other substance abuse?</p> <p>4) Reference is made to Appendix X but there is no such appendix in the document.</p>		
9	13/11/2020 17:41 PM ID: 151148200	n/a		
10	14/11/2020 12:37 PM ID: 152424557	n/a		
11	15/11/2020 13:44 PM ID: 152468159	No		
12	15/11/2020 15:30 PM ID: 152165406	We would make the point that the role of licensees and their staff is limited with regard to safeguarding, and it is arguable that the general requirement for the protection of children should already include safeguarding concerns. Safer Business Network offers training on vulnerability and how to identify potential Child Sexual Exploitation and Child Criminal Exploitation. It is important that licensees and bar staff understand what to look out for and what action to take if they have concerns, but this could be highlighted as part of policy CH1 without the level of detail proposed.		
13	15/11/2020 16:11 PM ID: 152478097	None		
14	15/11/2020 16:19 PM ID: 152449399	<p>How does the Licensing Authority propose to ensure checks and training has been undertaken for new applications and on existing?</p> <p>We support the points made by the Soho Society.</p>		

12. If you have any comments about the proposed changes to policy CH1, please provide them below and state the aspects that you are referring to:

	Response Percent	Response Total
	answered	14
	skipped	43

7. E. Proposal to retain the existing West End Cumulative Impact Zone boundary except for the North East beyond Covent Garden and to revise the Cumulative Impact Policy – CIP1

13. Do you agree with the proposed revisions to the framework of the Cumulative Impact Policy (CIP1)?

	Response Percent	Response Total
1	Yes	47.17% 25
2	No opinion	28.30% 15
3	No	24.53% 13
Statistics	answered	53
	skipped	4

Minimum	1	Mean	1.77	Std. Deviation	0.82	Satisfaction Rate	38.68
Maximum	3	Variance	0.67	Std. Error	0.11		

14. Do you agree with...?

	Yes	No opinion	No	Response Total
Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2	58.5% (31)	20.8% (11)	20.8% (11)	53
Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden)	48.1% (26)	27.8% (15)	24.1% (13)	54
Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone	39.6% (21)	39.6% (21)	20.8% (11)	53
			answered	55
			skipped	2

Matrix Charts

14.1. Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2									Response Percent	Response Total
1	Yes								58.5%	31
2	No opinion								20.8%	11
3	No								20.8%	11
Statistics	Minimum	1	Mean	1.62	Std. Deviation	0.81	Satisfaction Rate	31.13	answered	53
	Maximum	3	Variance	0.65	Std. Error	0.11				

14.2. Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden)									Response Percent	Response Total
1	Yes								48.1%	26
2	No opinion								27.8%	15
3	No								24.1%	13
Statistics	Minimum	1	Mean	1.76	Std. Deviation	0.82	Satisfaction Rate	37.96	answered	54
	Maximum	3	Variance	0.66	Std. Error	0.11				

14.3. Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone									Response Percent	Response Total
1	Yes								39.6%	21
2	No opinion								39.6%	21
3	No								20.8%	11
Statistics	Minimum	1	Mean	1.81	Std. Deviation	0.75	Satisfaction Rate	40.57	answered	53
	Maximum	3	Variance	0.57	Std. Error	0.1				

15. If you have any comments about the boundary proposals and the revision of the Cumulative Impact Policy (CP1), please provide them below and state the areas and aspects that you are referring to: Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone

			Response Percent	Response Total
1	Open-Ended Question		100.00%	23
1	12/10/2020 19:07 PM ID: 150000861	Zone 1 using the circle line as a guide is sufficient for consideration. This also includes the boundary north of Covent Garden. The directive or proposed changes by Westminster Council needs to be also considered ie road closures, bus and road rerouting..		
2	12/10/2020 19:42 PM ID: 150000476	I disagree with ""Removal of the Cumulative Impact Zones for Edgware Road and Queensway/Bayswater"". Both are areas of high residential density, and removing protections for residents will be bad news for us. I expect you will see some pushback, particularly around Bayswater/Queensway which already suffer from antisocial behaviour.		
3	13/10/2020 03:54 AM ID: 150016287	If Park Lane was recreated as a pedestrian-friendly boulevard (with two-way traffic reinstated on East Carriage Drive), then it has the potential to be a Special Consideration Zone where - especially in light of Covid-19 and the absence of Winter Wonderland this year - it could be classified as a Special Outdoor Space or Place, to give a major boost to the hospitality business. The Special Outdoor Space could be from 5 to 10 metres wide, say, and extend for more than 1000 metres, from Marble Arch to Hyde Park Corner. It could and should become a major Place of international significance, and remain when the virus is gone. Is there another city where you will find more than 1000 metres of exceptional tree-lined public space, west-facing (!) onto that city's premier Park? TfL are clueless, and are harming Park Lane, even more than it was harmed over 50 years ago. It is up to Westminster City Council to rescue one of the best places in London - potentially....		
4	13/10/2020 12:47 PM ID: 150037782	I think the West End is and always has been a lively nighttime area and it is good to have an area for young people to go with lots of venues.		
5	13/10/2020 20:38 PM ID: 150040177	As previously stated, restricting licences for new premises to use between 1000 and 2100 at this stage seems excessive and counterproductive. If a licensed premise or entertainment venue has gone out of business because of lockdown, then anyone taking over that venue should be allowed to use the previous licensing arrangements as a starting point for negotiations. A lot of entertainment venues would not need to be open at 10am, but they would need to be open until 11pm to have any reasonable chance of turning a profit. Zone-wise, I agree that it is prudent to avoid any major changes at present because the density of licensed premises and the number of people visiting them		

15. If you have any comments about the boundary proposals and the revision of the Cumulative Impact Policy (CP1), please provide them below and state the areas and aspects that you are referring to: Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone

			Response Percent	Response Total
		post-lockdown is likely to decrease, which may in turn reduce the cumulative impact in some problematic areas anyway. From personal experience, if I were to set a stress area, I'd make it all of Zone 1 plus the Covent Garden and Strand areas, while continuing research into areas south of Trafalgar Square, west of Regent Street and the main strip of Edgware Road. This would allow you to see if custom that was travelling to the West End pre-lockdown is seeking its kicks in a wider geographical area, and whether that in turn is having a detrimental effect on those specific neighbourhoods well ahead of the next renewal in 2026.		
6	24/10/2020 17:30 PM ID: 150975443	<p>I don't agree with:</p> <p>It is the Licensing Authority's policy to refuse applications that have an opening hour before 10:00</p> <p>and a terminal hour beyond 21:00 within the West End Cumulative Impact Zone for:</p> <p>(1) Pubs and bars,</p> <p>(2) Fast Food Premises, and</p> <p>(3) music and dancing and similar entertainment venues</p> <p>It is crazy to impose these hours - just keep the hours as they were for the previous license holder (unless there were complaints). A9pm close will make the place untenable. All you will do is create spill over into the area just outside the zone. You should want to keep all/ most of the nighttime activity in the central zone rather than dispersing it through residential nearby areas.</p>		
7	10/11/2020 18:50 PM ID: 152122700	<p>It is the Licensing Authority's policy to refuse applications that have an opening hour before 10:00</p> <p>and a terminal hour beyond 21:00 within the West End Cumulative Impact Zone for:</p> <p>(1) Pubs and bars,</p> <p>(2) Fast Food Premises, and</p> <p>(3) music and dancing and similar entertainment venues</p> <p>21:00 closing for licensed premises is unrealistic, it will have devastating impact to the late night economy</p>		
8	11/11/2020 15:38 PM ID: 152194841	Zone 2 is subject to significant development and cumulative impact. Including it in the Zone does not preclude development but offers protection.		
9	11/11/2020 17:19 PM ID: 152172014	This question is confusing as it conflates the decision on the boundary of the WECIA with the policies within CIP1 This policy in the document is CIP1 not CP1. I		

15. If you have any comments about the boundary proposals and the revision of the Cumulative Impact Policy (CP1), please provide them below and state the areas and aspects that you are referring to: Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone

			Response Percent	Response Total
		<p>have no comments about the boundary proposals but CIP1 itself does not refer to them. There are no questions about the policies in CIP1 which is a very serious weakness of this survey. It is a major policy change that is proposed and yet there are no questions about CIP1. Why not and how is this omission justified? It tends to undermine trust in the objectivity of this survey.</p> <p>I support the actual policies of CIP1 but am worried as to whether the LA will be able to defend Clause A of that policy sufficiently robustly to justify substituting it for the previous presumptions against granting.</p>		
10	13/11/2020 12:17 PM ID: 152348366	<p>As outlined above, we do not agree with the fast-food premises being treated as the same in terms of their impact as alcohol-led premises. We are also concerned that with a significant number of vacant units expected in the wake of Covid-19, a 9pm terminal hour is too restrictive. This is particularly relevant in the context of areas such as St James's Market, where there are no residential homes, and as a result we cannot see why this area is included within the Cumulative Impact Zone, which we believe should be moved eastwards to run along Haymarket.</p> <p>More broadly, we welcome the direction of travel to a more flexible approach within the CIZ, particularly the greater flexibilities offered to theatres and cinemas and qualifying clubs to provide alcohol to a later hour. This is a flexibility which our members have been calling for for many years, particularly as alcohol in cinemas, theatres and qualifying clubs is invariably ancillary to their main function and would not impact upon the licencing objectives. This is recognised in the Cumulative Impact Assessment and we would ask that the authority applies this new measure flexibly when determining new and amended licensing applications, in-line with London's ambition to be a global, 24/7 City.</p>		
11	13/11/2020 15:01 PM ID: 152367343	<p>As outlined above, are concerned that with a significant number of vacant units expected in the wake of Covid-19, a 9pm terminal hour for new bars and fast-food outlets is too restrictive and will fail to support the economic recovery of central London. We are also concerned about the evidence-base and how wider issues are considered when designating Zones.</p> <p>We nonetheless welcome the direction of travel to a more flexible approach within the CIZ, particularly the greater flexibilities offered to theatres and cinemas and qualifying clubs to provide alcohol to a later hour. This is a flexibility which our members have been calling for for many years, particularly as alcohol in cinemas,</p>		

15. If you have any comments about the boundary proposals and the revision of the Cumulative Impact Policy (CP1), please provide them below and state the areas and aspects that you are referring to: Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone

			Response Percent	Response Total
		<p>theatres and qualifying clubs is invariably ancillary to their main function and would not impact upon the licencing objectives.</p> <p>This is recognised in the Cumulative Impact Assessment and we would ask that the authority applies this new measure flexibly when determining new and amended licensing applications, in-line with London's ambition to be a global, 24/7 City.</p>		
12	13/11/2020 17:41 PM ID: 151148200	n/a		
13	14/11/2020 12:37 PM ID: 152424557	<ul style="list-style-type: none"> • Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 <ul style="list-style-type: none"> → Zone 1: We agree that the area of Zone 1 should not be expanded → Zone 2: SCZ is a busy transition and transport interchange for buses, rail and underground so while the incidents are high, this cannot be attributed to licensing policy for the area. • Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) • Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone. <ul style="list-style-type: none"> → We support the reduced area and the change of boundary. 		
14	14/11/2020 17:50 PM ID: 152441492	I believe the cumulative impact zone should include zones 1 and 2 and to be further extended all the way to green park.		
15	14/11/2020 17:57 PM ID: 152445317	I believe the cumulative impact zone should include zones 1 and 2 and to be further extended all the way to green park.		
16	15/11/2020 12:52 PM ID: 152470624	<p>Boundary</p> <p>Whilst we understand that the analysis supports the exclusion on the NE of Covent Garden from the zone the absence of observational data means that public nuisance impacts are understated. Also the boundary chosen for the zone is along a road which has significant numbers of premises on both sides and is not a natural boundary. The fact that one side of the road is excluded means that there may now be a flurry of applications to vary licenses on that side to remove conditions which require alcohol to be served with food, and so quickly turn the area into one with many bars. It would continue to make sense to draw the area boundary along a major boundary road, such as Kingsway as it is now.</p>		

15. If you have any comments about the boundary proposals and the revision of the Cumulative Impact Policy (CP1), please provide them below and state the areas and aspects that you are referring to: Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone

			Response Percent	Response Total
		<p>Policy Wording</p> <p>We have long seen that the Licensing Authority, when considering applications, places a lot of emphasis on the presumption to refuse for certain types of premises and too little emphasis on the requirement that other types of premises</p> <p>"must demonstrate that they will not add to cumulative impact in the Cumulative Impact Areas."</p> <p>We believe that this is best addressed by reversing the emphasis in Paragraphs 1 and 2 in CIP1. Whilst this does not change the Policy it may serve to emphasise the importance of not adding to Cumulative Impact, rather than the importance of not falling into a particular premises type.</p> <p>Our suggested wording is as follows:</p> <p>It is the Licensing Authority's policy to refuse applications that are unable to demonstrate that they will not add to cumulative impact within the West End Cumulative Impact Zone.</p> <p>This applies especially to premises of the following types within the zone that have an opening hour before 10:00 and a terminal hour beyond 21:00</p> <p>(1) Pubs and bars, (2) Fast Food Premises, and (3) music and dancing and similar entertainment venues</p> <p>Applications for other premises types within the West End Cumulative Impact Zones are subject to other policies within this statement.</p>		
17	15/11/2020 13:44 PM ID: 152468159	No		
18	15/11/2020 15:28 PM ID: 151604949	The proposed exemption for new licences with a terminal hour of 9pm has caused some concern in the industry. Although couched in permissive terms, this appears to set a limit on new licences of 9pm, whereas under the current policies, in practice, applications within Core Hours were looked on more favourably within the Stress Area than those outside of Core Hours. This revision appears to bring an end to that. Further, no sustainable licensed business could be created, with the significant investment required, with a terminal hour of 9pm. Therefore in terms of		

15. If you have any comments about the boundary proposals and the revision of the Cumulative Impact Policy (CP1), please provide them below and state the areas and aspects that you are referring to: Not expanding the West End Cumulative Impact Zone to include Zones 1 and 2 Retaining the current West End Cumulative Impact Zone (except for the North East beyond Covent Garden) Excluding the area to the North East of Covent Garden, which is within the current boundary of the West End Cumulative Impact Zone, from the proposed new boundary for this Zone

			Response Percent	Response Total
		identifiable benefit to the industry (and therefore benefit to the Borough as an unused/irrelevant policy is of no benefit to anyone) there is nothing within the new proposals that will have a real world effect.		
19	15/11/2020 15:30 PM ID: 152165406	We believe the West End Cumulative Impact Zone should be kept under review over the next 12 months to ensure that it does not become a barrier to the recovery of licensed premises which have been among the hardest hit businesses as a result of the pandemic.		
20	15/11/2020 16:11 PM ID: 152478097	No opinion		
21	15/11/2020 16:19 PM ID: 152449399	North East of Covent Garden: We feel the existing boundary should remain to ensure cumulative impact does not increase. If 20mp reduces accidents you don't therefore return to 30mp which is the analogy relating to this proposal.		
22	15/11/2020 17:34 PM ID: 152481404	See my earlier comments about fixed boundaries.		
23	15/11/2020 17:59 PM ID: 152483731	Retaining the current West End Cumulative Impact Zone in light of the present circumstances of pandemic impact on the Central London economy, it makes sense just to keep it the way businesses and residents are accustomed to licensing regime for the West End.		
			answered	23
			skipped	34

8. F. Removal of the Queensway/Bayswater and Edgware Road Cumulative Impact Zones

16. Regarding the following Cumulative Impact Zones, do you agree with the proposal to remove the...?

	Yes	No	No opinion	N/A	Response Total
Queensway/Bayswater Cumulative Impact Zones	30.9% (17)	36.4% (20)	30.9% (17)	1.8% (1)	55
Edgware Road Cumulative Impact Zone	29.6% (16)	38.9% (21)	29.6% (16)	1.9% (1)	54

16. Regarding the following Cumulative Impact Zones, do you agree with the proposal to remove the...?

	Yes	No	No opinion	N/A	Response Total
				answered	55
				skipped	2

Matrix Charts

16.1. Queensway/Bayswater Cumulative Impact Zones									Response Percent	Response Total
1	Yes								30.9%	17
2	No								36.4%	20
3	No opinion								30.9%	17
4	N/A								1.8%	1
Statistics	Minimum	1	Mean	2.04	Std. Deviation	0.83	Satisfaction Rate	34.55	answered	55
	Maximum	4	Variance	0.69	Std. Error	0.11				

16.2. Edgware Road Cumulative Impact Zone									Response Percent	Response Total
1	Yes								29.6%	16
2	No								38.9%	21
3	No opinion								29.6%	16
4	N/A								1.9%	1
Statistics	Minimum	1	Mean	2.04	Std. Deviation	0.82	Satisfaction Rate	34.57	answered	54
	Maximum	4	Variance	0.67	Std. Error	0.11				

17. If you have any comments about the proposal to remove the Queensway/Bayswater and Edgware Road Cumulative Impact Zones, please provide them below and state which area and aspects you are referring to:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	14
1	12/10/2020 19:07 PM ID: 150000861	These are areas within zone 1 and required to be included		
2	12/10/2020 19:42 PM ID: 150000476	I believe I have answered this; I'm sure you will remove them anyway, and I and many of my fellow residents will watch keenly for any worsening in antisocial behaviour which may be attributed to removal of these protections. Unlike Soho and Covent Garden residents, we did not move to noisy areas - we chose quieter more residential areas and will mobilise should that change noticeably further.		
3	13/10/2020 09:38 AM ID: 150020804	<p>In section 3.4 you indicate that you could not conclusively link licensed premises with the increase in incidents. Why is 3.9x not considered high enough to continue to consider it ClZ? Given the Edgware incident rate is significantly (35%) higher than Queensway/Bayswater, why are they not addressed separately.</p> <p>""Queensway/Bayswater and Edgware Road were found not to be under cumulative stress. The levels of incidents rates in these areas were higher than the borough average (Queensway/Bayswater 2.9 and Edgware Road 3.9) but the incidents could not be conclusively linked to licensed premises to demonstrate cumulative impact. Incidents in the area specifically related to crime and disorder and public nuisance issues (waste and noise).""</p>		
4	13/10/2020 12:47 PM ID: 150037782	<p>There are high levels of harrassment, nuisance, noise, drug dealing, prostitution, pick pocketing, begging and low level activities which may not meet your criteria but strongly impact local residents. There is also a lot of thefts from cars, muggings and attempted opportunistic burglaries which go unreported to police in most cases.</p> <p>It is when neighbourhoods have this kind of crime that you should act to stop it becoming lawless and out of control.</p>		
5	13/10/2020 20:38 PM ID: 150040177	<p>I would prefer Queensway / Bayswater to be left to the people who live in the area - they would know best.</p> <p>I can see some benefit in the Edgware Road zone but feel that it would need further research - it's a long road and therefore should be broken up into a number of areas between certain junctions to ascertain which parts may benefit from being included in a stress zone in 2026. Certainly, the southern end closest to Marble Arch would be busier as far as most revellers are concerned, but I wouldn't have a clue about the positive or negative effects of the many restaurants and shisha lounges along the entire stretch.</p>		

17. If you have any comments about the proposal to remove the Queensway/Bayswater and Edgware Road Cumulative Impact Zones, please provide them below and state which area and aspects you are referring to:

			Response Percent	Response Total
6	13/11/2020 15:01 PM ID: 152367343	Whilst the Westminster BIDs welcome the removal of the cumulative impact designation for Edgware Road, we dispute some of the analysis that links licensed premises to crime in the area. A significant amount of crime is not directly attributable to any individual licensed premises in the area as set out above. More flexibility should be given for new licences sought in the area, to encourage new activities in, and as these are new licences, then the Council can require better management policies and practices. This will not only help in reducing the currently high vacancy rate in the area but also help create competition between licensed premises which might result in a general leveling up. The Impact study states that there are some problematic premises, along the Edgware Road and it is unfair that licences not connected with these problematic premises should suffer as a result – a position that is mirrored elsewhere at other locations in the borough.		
7	13/11/2020 17:34 PM ID: 152298169	Investigation and preferably action where appropriate is needed regarding the prevalence of incidents in the area.		
8	13/11/2020 17:41 PM ID: 151148200	n/a		
9	14/11/2020 12:37 PM ID: 152424557	n/a		
10	15/11/2020 12:52 PM ID: 152470624	As with East Covent Garden the absence of an observational study means that public nuisance impacts will be understated in the analysis. Carrying out this study (pre-Covid) would have shown a very different picture.		
11	15/11/2020 15:30 PM ID: 152165406	We support the views of our partner, Marble Arch BID, with regard to the removal of the Cumulative Impact Zone for Edgware Road, and again, would highlight that it is difficult to attribute crime levels in an area specifically to licensed premises. In the Edgware Road area, other factors such as vice/prostitution lead to a range of issues, including drug dealing and usage and violent crime. While it is of course possible to identify those licensed premises that are particularly problematic, it is not fair to penalise well run premises that operate alongside these just on the basis of their proximity. Going forward, it is important to encourage new premises into the area as the West End moves towards recovery from the health crisis.		
12	15/11/2020 16:11 PM ID: 152478097	No opinion		
13	15/11/2020 16:19 PM ID: 152449399	These removals will almost certainly lead to CI especially given the new E Use Class Order.		
14	15/11/2020 17:59 PM ID: 152483731	Just retain things as there are at the moment till after its clearer what the impact of COVID19 will be long time on the street economy of these CIZs.		
			answered	14

17. If you have any comments about the proposal to remove the Queensway/Bayswater and Edgware Road Cumulative Impact Zones, please provide them below and state which area and aspects you are referring to:

	Response Percent	Response Total
	skipped	43

9. G. Proposed changes to the Core Hours Policy - HRS1

18. Do you agree with the proposed changes to the Core Hours Policy (HRS1), including the reasoning behind them?

	Response Percent	Response Total
1 Yes	37.74%	20
2 No opinion	16.98%	9
3 No	45.28%	24
Statistics	answered	53
Minimum	1	Mean
Maximum	3	Variance
		Std. Deviation
		Std. Error
		Satisfaction Rate
		53.77
	skipped	4

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

	Response Percent	Response Total
1 Open-Ended Question	100.00%	28
1 12/10/2020 19:13 PM ID: 150002896		Restrict core hours
2 12/10/2020 19:42 PM ID: 150000476		This clumsy/opaque wording ""However, within the West End Cumulative Impact Zone we intend to restrict the sale by retail of alcohol and late-night refreshment from 23:00 to customers/visitors who are taking part in the primary use of the premises, e.g. exhibition or members of the audience only. This is hoped to provide additional opportunities to provide licensable activity at the end of a performance to customers."" implies you will stop theatres etc. serving alcohol from 11pm - if this is the case I strongly disagree with this proposal as it will limit opportunities for revenue generation for these valuable businesses. Aren't they already suffering enough as a result of the pandemic?
3 12/10/2020 21:23 PM ID: 150008665		The link does not go to the information on Core Hours Policy so this question cannot be

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

			Response Percent	Response Total
4	12/10/2020 23:55 PM ID: 150015108	They are appalling.		
5	13/10/2020 09:38 AM ID: 150020804	<p>1. Given all the negative pressure on the hospitality industry from COVID, does it make sense to implement this right now?</p> <p>2. Are we pushing the activity that would naturally be largely contained in a small area out into other neighbourhoods as people who want to enjoy the night industry past midnight will seek out other venues.</p> <p>3. How do other large cities manage this issue? Is it through early closings?</p>		
6	13/10/2020 12:47 PM ID: 150037782	<p>I do not think Queensway and Bayswater or Edgware Road should be downgraded to Special Consideration Zones and the higher criteria for good management to obtain late and longer licensing should apply.</p> <p>I do not think hotels should have core hours starting from 9am as this is already causing me lots of disturbed mornings when their large events start at 9am but guests for Indian weddings arrive in the hundreds with bands, drums, loud music and start a procession in the street and then gather outside the hotel at 8am onwards on weekends. Please change morning licensing core hours to 10.30am on weekends.</p>		
7	13/10/2020 20:38 PM ID: 150040177	<p>The explanation of the Core Hours Policy is a little unclear, as I'm not a licensee, but I think I get the picture. It would have been handy to have had some examples of how the policy is interpreted at present and in future by different types of establishment to be absolutely certain. I do agree that amending the policy to better reflect the use of specific premises makes more sense. However, what the public using these premises would like to see is a clear set of opening hours displayed at the entrance of each licensed premise. Since "24-hour drinking" became permissible, there have been times when I've been in a bar and found out that it closed at midnight rather than 1am, or 11pm rather than midnight. This can lead to enormous problems if someone gets a round in and last orders is called a few seconds later. I would also like to see drinking-up time legally extended to 40 or 60 minutes. Some West End chains are famous for calling time (sometimes even putting their clocks forward by a few minutes) and then immediately harrasing customers to drink up and leave, or moving them closer to the door. Some have even closed their toilets dead on 11pm because "we're cleaning / we've cleaned them", which leads to public urination regardless of whether there is a suitable facility situated mere yards away. It also encourages people to drink faster and can cause a lot of ill-feeling between tired landlords and tipsy patrons. They charge the public a lot of money for not a lot of service, quite frankly, so they can afford to pay their staff for the extra hour or so it takes to clean up and wind down. If their staff need to rush off to catch a last tube or train, they perhaps should consider hiring staff who live closer - or, better still, set up an account with a reputable cab firm like any other reputable employer who cared about their staff would. I've rather tired of being herded out of pubs and bars like sheep at 11.01pm</p>		

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

			Response Percent	Response Total
		and now no longer grace these establishments with my custom, which is their loss and yours.		
8	24/10/2020 17:30 PM ID: 150975443	see earlier comment		
9	10/11/2020 18:50 PM ID: 152122700	The proposed permitted hours for licensed premises HRS1C would be catastrophic to the hospitality and night time economy which West end is know for.		
10	11/11/2020 15:38 PM ID: 152194841	Nuisance impact goes well beyond core hours and well beyond the licensed premises. There is adequate provision of late night licensed activity in the borough. The main effect of increasing core hours is simply to add to the asset value of premises, which is not an objective of licensing policy. It may indeed be a negative for some premises operators where the landlord requires premises value to be maximised regardless of the operator's preferred/existing hours of operation. Some operators will see their rents increased to reflect the ability to turn the same premises to more trading, regardless of whether this is good for their business.		
11	11/11/2020 17:19 PM ID: 152172014	I support the change to a policy based on uses. I do not support the second sentence of Para 8.3 and ask for it to be removed as this gives the LA too much leeway to disregard its own policies and also feel that the third sentence is sufficient to make clear each application is judged on its merits. Whilst Clause A is clear Clause B and the 14 points it contains as worded will make it extremely difficult to refuse applications to extend hours for Pubs and bars, fast food and music and dance venues in the WECIA as set out in C1. Therefore I ask that fifteenth point is added to Clause B worded as follows. In relation to Clause C1 applications will need to demonstrate that the circumstances are clearly exceptional in order to justify any extension of hours'.		
12	12/11/2020 14:19 PM ID: 152273419	Too much of a stranglehold on businesses at these times.		
13	13/11/2020 12:17 PM ID: 152348366	As outlined above, we welcome the direction of travel in offering greater flexibilities and the focus on uses rather than the provision of alcohol as a licensable activity. The West End has been transformed over the past 20 years following the initial designation of the stress area and drive to support more food-led premises. However, we are concerned about the proposed terminal hour of 9pm for new applications and believe this should be extended. An extension of hours for bars and pubs, albeit to less than core hours, would retain the distinction between the West End Cumulative Impact Zone and areas outside it, but would support venues at this difficult time by allowing a longer trading period which could reduce their need to apply for an extension of hours. This would also be particularly helpful for any new businesses looking to start up within the Cumulative Impact Zone as a result of other premises having closed down due to the health crisis.		

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

		Response Percent	Response Total
14	13/11/2020 15:01 PM ID: 152367343		

We also retain concerns about the grouping of the premises and how they are impacted by the proposed new policy HRS1, particularly for new applications in the CIZ. We also note that the policy still does not distinguish between the Evening and Night-Time Economy, which have very different characteristics and impact and believe that this could be made more explicit.

Whilst the new policy HRS1 supports new applications in the CIZ, we would encourage the authority to think more flexibly as to its application. For example, a major landlord could give up a premises licence which has a core hours (or later) licence in order for the premises to be let to a new operator or use. However, a further unit which they own may become vacant nearby but would be limited to a 9pm terminal hour if there were a new application to introduce a bar. We would therefore encourage the authority to consider the opportunity to introduce a credit system for responsible landowners to manage uses flexibly across their estates, to avoid vacant units in the future.

As outlined above, we welcome the direction of travel in offering greater flexibilities and the focus on uses rather than solely every licensable activity. The West End has been transformed over the past 20 years following the initial designation of the stress area and drive to support more food-led premises.

We nonetheless retain concerns about the grouping of the premises and how they are impacted by the proposed new policy HRS1, particularly for new applications in the CIZ. We also note that the policy still does not distinguish between the Evening and Night-Time Economy, which have very different characteristics and require different management structures.

Whilst the new policy HRS1 supports new applications in the CIZ, we would also encourage the authority to think more flexibly as to its application. For example, a major landlord could give up a premises licence which has a core hours (or later) licence in order for the premises to be let to a new operator or use. However, a further unit which they own may become vacant nearby but would be limited to a 9pm terminal hour if there were a new application to introduce a bar. We would therefore encourage the authority to consider the opportunity to introduce a credit system for responsible landowners to manage uses flexibly across their estates, to avoid vacant units in the future.

As a final point, we would welcome additional clarity being provided as to how well-run premises that are operating successfully and without impact upon the local area could apply for additional hours, both within and outside the CIZ. For example, how a hotel bar could seek additional hours where the provision of

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

			Response Percent	Response Total
		alcohol is ancillary to their core function, or a qualifying club – and how such applications would be determined and considered upon which criteria.		
15	13/11/2020 15:51 PM ID: 152367683	C (1) : The proposed introduction of the 21:00 terminal hour does not appear to be fully supported by the findings of the Cumulative Impact Assessment. The only time that 21:00 hours has apparent support is in the statistics relating to alcohol related call outs. These are not alcohol related crimes per se, just call outs. There is no apparent evidence of 21:00 hours being supported at all in the statistics for thefts; robberies; violent crimes or drug related crimes. Whilst the graph does show an increase in noise at 21:00 hours, it is generally accepted that sleep disturbance occurs (subject to the background noise and individual case issues) after 22:00 at the earliest and more generally 23:00 hours.		
16	13/11/2020 17:41 PM ID: 151148200	Our response to Question 18 relates specifically to the revised core hours for pubs and bars, fast food and music and dance venues within the West End CIZ. The revised hours for this area may reduce the appeal of this area to tourists.		
17	14/11/2020 10:45 AM ID: 152412909	I think that restaurants are very safe places in which we do a lot of control while selling alcohol. therefore, I think the time for restaurants with a lounge bar should be able to sell alcohol till midnight every day and 1 a.m for the weekend. as said, restaurants are safe and we implement policies for alcohol sale. for instance, challenge 25 or do not sell alcohol to drunk people.		
18	14/11/2020 12:37 PM ID: 152424557	We support the proposal to apply core hours to 'types' of premises rather than licensable activity as this will attract a diverse range of visitors and support the cultural organisations in our area. We wish to support the recovery of hospitality businesses following the impact of the current health crisis, we believe that the Core Hours Policy (HRS1) for pubs and bars, Fast Food and Music and Dance venues within the West End Cumulative Impact Zone should be Monday to Sunday: 10.00 to 22.30. This would retain the distinction between the West End Cumulative Impact Zone and areas outside it, but would support venues at this difficult time by allowing a longer trading period which could reduce their need to apply for an extension of hours. This would also be particularly helpful for any new businesses looking to start up within the Cumulative Impact Zone as a result of other premises having closed down due to the health crisis.		
19	14/11/2020 19:29 PM ID: 152448869	I think the core hours change to 2100hrs at a time when business needs to be able to trade for as long as possible is detrimental to the recovery of the economy for the West End.		
20	15/11/2020 12:52 PM ID: 152470624	HRS1, along with CIP1, are the policies on which residents in the CGCA's area most often rely to ensure that the Licensing Objectives are supported. Other Policies, especially PN1, are equally important, and it is clear in HRS1 that		

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

			Response Percent	Response Total
		<p>presumption was to refuse applications this change in policy allows NEW premises licences between these hours and then apply for a variation to extend. I am also concerned that this would inadvertently benefit restaurants, in changing their core operation as a food led business to a bar until 9pm then revert to restaurant post 21:00. This must be avoided at all costs, there are 226 restaurants in Soho and any such changes would have huge impact in the area.</p>		
22	15/11/2020 15:28 PM ID: 151604949	<p>See previous comments on hours (eg- terminal hours of 9 pm for pubs and bars in the west end is not helpful for the industry). Residents and other interested parties will argue that licences should only be granted to those times and require additional expense for representation and evidence gathering to argue this. Residents are all already provided with a free service for representation through the Westminster CAB scheme but note businesses are not.</p> <p>Further definitions of types of premises are difficult and will lead to problems in interpretation. This can be seen by the recent raft of Covid legislation that seeks to define premises types.</p>		
23	15/11/2020 15:30 PM ID: 152165406	<p>Further to our previous comments with regard to the role of Licensing Policies and Cumulative Impact Policies in supporting the recovery of hospitality businesses following the impact of the current health crisis, we believe that the Core Hours Policy (HRS1) for pubs and bars, Fast Food and Music and Dance venues within the West End Cumulative Impact Zone should be Monday to Sunday: 10.00 to 22.30. This would retain the distinction between the West End Cumulative Impact Zone and areas outside it, but would support venues at this difficult time by allowing a longer trading period which could reduce their need to apply for an extension of hours. This would also be particularly helpful for any new businesses looking to start up within the Cumulative Impact Zone as a result of other premises having closed down due to the health crisis. We would also highlight the need for an additional half an hour "drinking up time" or winding down period following the Core Hours for licensable activity. We believe that the imposition of the 10pm curfew has demonstrated the need for this, to allow more staggered dispersal of customers from licensed premises, and to avoid significantly large crowds on the streets and public transport, noise and the potential for crime, all of which are detrimental to the local community. Given the current climate, the Licensing Policy should be more supportive overall of all hospitality businesses, including pubs, bars, and nightclubs which have been hardest hit by the health crisis.</p>		
24	15/11/2020 16:11 PM ID: 152478097	<p>The core hours policy is completely anti business, the terminal hours do not reflect any other city or district in Europe or America. Even historically pre licensing act 2003 the terminal hour was 11pm. Given the extended night tube and public transport arrangements and the effect of Covid the Council should look at allowing longer hours to give premises the ability to survive and give residents and visiting customers to licensed premises longer term to enjoy premises.</p>		

19. If you have any comments about the proposed changes to the Core Hours Policy (HRS1), please provide them below:

			Response Percent	Response Total
25	15/11/2020 16:19 PM ID: 152449399	We agree with the points made by the Soho Society. We are concerned at the proposed increase in core hours for entertainment and cultural activity, cinemas, cultural venues and live sporting venues with the CIA as this can only further compound the negative statistics in the CI analysis document as it will allow venues to operate as bars to the general public up to 23:00 with patrons being able to drink on into the night. This proposal is inappropriate for a CIA.		
26	15/11/2020 17:12 PM ID: 152381378	It is to be hoped that this won't lead to an increase in hours licensed premises are able to operate.		
27	15/11/2020 17:34 PM ID: 152481404	I have not been able to identify any reason for the 21:00hrs cut off in the West End CIZ. The CIZ already has other stringent controls in place and this is not required.		
28	19/11/2020 11:43 AM ID: 152267599	Agree however believe the core hours should be extended until 12:00 or 01:00		
			answered	28
			skipped	29

10. H. Introducing Special Consideration Zones

20. Do you agree with the proposal to introduce new Special Consideration Zones?

									Response Percent	Response Total
1	Yes								55.77%	29
2	No opinion								23.08%	12
3	No								21.15%	11
Statistics	Minimum	1	Mean	1.65	Std. Deviation	0.81	Satisfaction Rate	32.69	answered	52
	Maximum	3	Variance	0.65	Std. Error	0.11			skipped	5

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	20

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

			Response Percent	Response Total
1	12/10/2020 19:42 PM ID: 150000476	Again, I'm sure you'll do it anyway, you don't seem to listen to resident feedback on policies and I have to assume that this kind of thing is a fait accompli. I will watch with interest over the next few years to see what happens as a result of you forcing through these changes.		
2	13/10/2020 03:54 AM ID: 150016287	If Park Lane was recreated as a pedestrian-friendly boulevard (with two-way traffic reinstated on East Carriage Drive), then it has the potential to be a Special Consideration Zone where - especially in light of Covid-19 and the absence of Winter Wonderland this year - it could be classified as a Special Outdoor Space or Place, to give a major boost to the hospitality business. The Special Outdoor Space could be from 5 to 10 metres wide, say, and extend for more than 1000 metres, from Marble Arch to Hyde Park Corner. It could and should become a major Place of international significance, and remain when the virus is gone. Is there another city where you will find more than 1000 metres of exceptional tree-lined public space, west-facing (!) onto that city's premier Park? TfL are clueless, and are harming Park Lane, even more than it was harmed over 50 years ago. It is up to Westminster City Council to rescue one of the best places in London - potentially....		
3	13/10/2020 09:38 AM ID: 150020804	While I'm not sure about the justification of removing some of these areas from Cumulative Impact Zones, creating Special Consideration Zones seems warranted. I agree that you can't not do something given the elevated rate of incidents.		
4	13/10/2020 12:47 PM ID: 150037782	I agree with the proposal but do not agree Queensway/Bayswater and Edgware Road should be SCZ. I think they should remain CIZ.		
5	13/10/2020 20:38 PM ID: 150040177	<p>Firstly, the link at the top of this page links to the start of the survey not the proposals document.</p> <p>It is wise to keep all of the areas noted under review, and if designating them as Special Consideration Zones assists that then it seems a good approach.</p> <p>However, demanding more requirements of - and seeking assurances from - venue owners and landlords is but a pixel in the whole image. If someone wants to cause trouble on their way home from a venue or from one venue to another, they'll do so - how much paperwork has been filled out doesn't mean a thing. At the end of the day, police, environmental health, noise complaint and planning officers have got to do more across the board. It seems to me that the police are not investigating a lot of what's reported to them and are merely making a note for statistical reporting. Then, when the statistics show that over a period of time one area is statistically worse than another, they approach councils and demand a tougher approach to licensing because they feel that alcohol and drugs are largely to blame rather than their ineffectiveness in investigating crime and anti-social</p>		

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

	Response Percent	Response Total
<p>behaviour.</p> <p>This has been borne out during lockdown, particularly in the warmer weeks immediately prior to local pubs being reopened at the start of July. Aside from two female officers on bicycles moving on a group of six rough sleepers who are well known to the local constabulary for repeated anti-social behaviour and a couple of males enjoying the view over the Thames, the only officers I've seen and heard in the last six months are those who've been in cars tearing down local streets. They have otherwise been conspicuous by their absence.</p> <p>During the day we've had an individual walking up and down the street shouting obscenities at the top of his voice. The Met Police website could not accept reports, photo or video evidence as it was suffering a "run time error". Having said this, a report in the early days of lockdown of a group of 30 people ignoring social distancing and shielding advice was reported online, yet was not responded to. There has been an increase in the amount of noise from car stereos very late at night while waiting for the lights to change at the end of my street, as well as several instances of car and van drivers parking up for up to an hour outside people's houses treating the locals to their music tastes - and, in one instance, broadcasting a personal phone call via their car stereo. Police have been in the area and done nothing. Two houses opposite my flat have been given planning permission to erect an outside decking area that restricts the privacy of flats in their immediate vicinity, and both have had impromptu late-night gatherings. Police have been in the area and done nothing. One couple has split up twice late at night and let the whole neighbourhood know about it, and not a day goes by without some sort of argument in the street below me - usually between a car driver and a cyclist as a result of the "helpful" Covid-19 additions to local traffic flow.</p> <p>It is highly unlikely that any of those mentioned above had been in a pub or other licensed premise. The rough sleepers may have consumed a four-pack between them earlier in the day (which I think was the hottest day of the year), and the houseparties might have bought something from the off-licence but I'd wager they probably bought in bulk or had theirs delivered well in advance, but the others? Probably not.</p> <p>My point is that in this area, which is south of the Victoria Special Consideration Zone, the closing time revellers and weekend ravers are but a small part of our problem, and that the amount of bureaucracy reputable owners and landlords are having to contend with just to continue trading is rather disproportionate to the inaction of police and council officers towards other forms of anti-social behaviour.</p>		

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

			Response Percent	Response Total
		<p>If I remember rightly, during one summer football tournament local off-licences were told by the council and the police to close an hour before kick-off and not reopen until an hour after kick-off for all England matches, essentially forcing those stores to close at 7pm on one night which otherwise would have been one of their most profitable nights of business outwith the festive season. They were given a day's notice; the public only found out hours beforehand when official notices were put in store windows. Supermarkets were still allowed to sell alcohol and the pubs remained open, not that there was room at any of the inns. I have absolutely no idea which fragile members of the community this state of prohibition was meant to protect; it rather seemed to me that the police didn't want any bother because they wanted to watch the matches too. Similar measures were not put in place for games featuring any other nation, despite the fact that the tournament took place at the height of tourist season and this area is chockfull of hotels and B&Bs (nor have I seen similar measures put in place for rugby tournaments, which are just as popular around here). I remember one night where there was excessive noise for several hours after a match featuring another nation (I can't remember whether it was Spain or Italy or Mexico). The police were in the area and did nothing. To this day, win or lose, I have never experienced any trouble during or after an England football match; the only serious trouble I've ever seen in the streets around here was many years ago after a dull 1-1 league game between Chelsea and Spurs, which the police did attend - with dogs - and was soon brought under control.</p> <p>I am therefore hoping that the establishment of Special Consideration Zones does not get used as a future excuse for this sort of knee-jerk over-zealous reaction, and that efforts are taken to deal with all forms of disturbance in local streets at all times of day, not just ones that contravene what someone agreed to in a mass of council paperwork.</p>		
6	11/11/2020 17:19 PM ID: 152172014	I agree with the general concept and also as the creation of buffer zones to the WECIA but do not know the other areas in sufficient detail to know if these are the right boundaries.		
7	13/11/2020 12:17 PM ID: 152348366	<p>The introduction of SCZs is a welcome intermediate step between the full impact of CIZ policies and the wider borough. We would, however, welcome greater clarity as to what additional information or evidence new applications in SCZs are required to provide to secure a new licence or extend hours in the SCZ. We also consider that the Council's stated intention that this is not a preventative policy, is made very clear in the final Statement of Licensing Policy.</p> <p>We would also welcome clarity as to how often SCZs would be reviewed in the future – perhaps in partnership with local businesses and BIDs – and assurances as to how the review process would take place before the areas could be formally</p>		

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

			Response Percent	Response Total
		designated Cumulative Impact Zones, given the restrictive terminal hour proposed elsewhere in the policy.		
8	13/11/2020 13:02 PM ID: 152354533	Please see earlier comments concerning the Knightsbridge area.		
9	13/11/2020 15:01 PM ID: 152367343	<p>As outlined above we are concerned about the designation of Victoria and Northbank as SCZs with additional restrictions when most of the issues identified by the assessment are not a result of the evening or night-time economy in those areas.</p> <p>We would particularly welcome greater clarity as to what additional information or evidence new applications or applications to extend hours in SCZs are required to provide to secure a new licence or additional hours of operation. In our view, at present the additional requirements in the SCZs are opaque and the policy is vague as to what additional information the council will require from premises if they are to evidence that they are not adding to the cumulative impact in an area.</p> <p>As a further point, given the northern section of the Cumulative Impact Zone and West End buffer SCZ includes the eastern end of Oxford Street and the western side includes Regent Street, we would ask that the local authority considers the opportunity for additional flexibilities in these areas given their commercial natural, good transport links and lack of residential amenity. This is particularly relevant in the context of the changing nature of retail and the desire to provide more experiential retail opportunities and other complementary uses in these areas. In the context of Covid-19, we would ask that the local authority brings forward additional flexibilities to encourage active uses in these areas and support economic growth.</p> <p>Finally, we would also welcome clarity as to how often SCZs would be reviewed and considered in the future – perhaps in partnership with local businesses and BIDs who can provide substantial additional evidence on the effects and benefits of the evening and night-time economy.</p>		
10	13/11/2020 17:41 PM ID: 151148200	<p>We strongly oppose the proposal to introduce new SCZs for the following reasons:</p> <ul style="list-style-type: none"> - Businesses, including those in Victoria, are already struggling to continue operating amidst dramatically reduced incomes because of the coronavirus. They have incurred (and continue to incur) costs to adhere to government policy and guidelines to keep customers and staff safe. The SCZs would increase businesses' financial and operational costs further still. - Designating areas as SCZs may, as a result of increased costs incurred by businesses to adhere to the policy, cause businesses to close or to significantly revise their offer, for instance in the case of hotels which may decide not to keep 		

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

		Response Percent	Response Total
11	14/11/2020 12:37 PM ID: 152424557		

their bars open; such scaling back will reduce their appeal making it harder to attract business.

- WCC has decided not to expand the Cumulative Impact Zone in the West End at the current time to maintain a stable and familiar policy environment. It recognizes that the hospitality and entertainment sectors in this part of the borough have been heavily affected by the pandemic. This same approach should be applied to other areas, including Victoria, where businesses are facing similar extensive pressures. Businesses are entitled to the same consideration as businesses in the Cumulative Impact Zone in the West End area. As such, it is wholly inappropriate to pursue implementation of a new policy approach such as the SCZ at this time. At this time of crisis in London and Westminster, businesses in Victoria need support, not uncertainty nor additional burdens. A key part of that is providing continued regulatory stability and consistency by maintaining the existing policy approach which businesses and residents are familiar with.
- No detail is provided within the draft SCZ Policy as to what additional mitigation and controls might be required. However, even if details were provided, such measures would likely impose significant additional costs upon businesses to implement measures that are not justified by the incident data and its interpretation within the CIA.
- The proposed measures risk penalizing operators who manage their premises well rather than focusing on enforcement of the existing framework.

As a result of the above we strongly oppose the proposal to introduce new Special Consideration Zones.

The Northbank BID does not support the proposal to introduce new Special Consideration Zones for the following reasons:

- Businesses, including those in Zone 2, are already struggling to continue operating amidst dramatically reduced incomes because of the coronavirus. They have incurred (and continue to incur) costs to adhere to government policy and guidelines to keep customers and staff safe. The SCZs would increase businesses’ financial and operational costs further still.
- Changes to policy is unwelcome when the trading environment is tough. Businesses currently need support and stability to enable them to plan for the challenging times in the short and mid term. It is inappropriate to pursue implementation of a new policy approach such as the SCZ at this time. At this time of crisis in London and Westminster, our local businesses need support, not uncertainty nor additional burdens. A key part of that is providing continued regulatory stability and consistency by maintaining the existing policy approach which businesses and residents are familiar with.
- Designating areas as SCZs may, as a result of increased costs incurred by

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

			Response Percent	Response Total
		<p>businesses to adhere to the policy, cause businesses to close or to significantly revise their offer, for instance in the case of hotels which may decide not to keep their bars open; such scaling back will reduce their appeal making it harder to attract business.</p> <p>– No detail is provided within the draft SCZ Policy as to what additional mitigation and controls might be required. However, even if details were provided, such measures would likely impose significant additional costs upon businesses to implement measures that are not justified by the incident data and its interpretation within the CIA.</p>		
12	14/11/2020 19:29 PM ID: 152448869	Although the conditions are less stringent than a CIZ area they are still very restrictive for businesses and my concern is that they will be treated in a similar way to a CIZ.		
13	15/11/2020 12:52 PM ID: 152470624	<p>We agree ONLY compared to the option of treating these areas as the same as the rest of the Borough. If these zones were in almost any other borough in London they would justify being Cumulative Impact Zones as they would have very high impacts from the licensed premises within them. It is only by comparison with the Westminster average level, driven by the extremely high levels in Zone 1, and they appear to have a lesser impact.</p> <p>We believe that Paragraph C1 needs rewording. We do not agree with the assertion that there is no cumulative impact in these areas. There is an impact, but it is not at a high enough level to justify (at the moment) designating the area as a CIZ where a presumption to refuse should apply. We also question whether "by particularising the steps.." is a recognised phrase in English.</p> <p>In Paragraph A we believe that as well as the 2020 Impact Assessment applicants need to take account of other local issues of which they are aware.</p> <p>In Paragraph B the mitigation they introduce should go further than "reduce the risk of failing to promote the Licensing Objectives". The mitigations they introduce need to promote the licensing objectives. If they only reduce the risks then it is possible for them to still have a moderate, but lower than high risk of harming the licensing objectives and still comply with this policy.</p>		
14	15/11/2020 13:44 PM ID: 152468159	I agree only in that something has to replace the CI zones which have been removed, the proposal is far weaker than the CIZ, I would suggest WCC evaluates this policy after 12 months of operation to determine its impact.		
15	15/11/2020 15:28 PM ID: 151604949	The introduction of SCZs adds another layer of complexity to the licensing system that it simply does not need. The evidence supporting the introduction of these Zones is questionable in light of the continuing changes brought about by the		

21. If you have any comments about the proposal to introduce new Special Consideration Zones, please provide them below:

			Response Percent	Response Total
		<p>COVID epidemic. There is certainly no requirement for SCZ in the current climate and any move to introduce them should only be considered once a post-COVID investigation can be completed.</p> <p>EG how will an applicant know what the problems are if they are not stated in the policy.</p> <p>Any local factors that need addressing should be specified in the policy. The local data findings in the report are out of date given COVID we think it would be wrong to implement this now. The current policy has handled this well and there is no need for change.</p>		
16	15/11/2020 15:30 PM ID: 152165406	We support the proposal given the potential stress in the areas concerned and recognise the Council's intention that this is not a preventative policy. This should, however, be made very clear in the final Statement of Licensing Policy along with a process for how applications will be determined.		
17	15/11/2020 16:11 PM ID: 152478097	It is totally unnecessary and anti business		
18	15/11/2020 16:19 PM ID: 152449399	See below as 20 does not allow for different view for each area.		
19	15/11/2020 17:34 PM ID: 152481404	In some ways, this addresses my particular concerns about the rigidity of the CIZ boundaries. If the requirement of a premises in the SCZ is to be extremely well-managed premises then why not zone all CIZ, and the proposed SCZ, as simply SCZ and scrap the CIZ altogether?		
20	15/11/2020 21:44 PM ID: 152485251	We support support the principle of SCZ's but do not agree with any of the proposed removals of Cumulative Impact Area status and believe that the Berkeley/Dover Street area should be a CIA.		
			answered	20
			skipped	37

22. Do you agree with the reasoning, boundary and designation of the following zones?

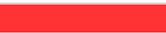
	Yes	No	No opinion	Response Total
West End Buffer	42.3% (22)	28.8% (15)	28.8% (15)	52
Queensway/Bayswater	33.3% (17)	29.4% (15)	37.3% (19)	51

22. Do you agree with the reasoning, boundary and designation of the following zones?

	Yes	No	No opinion	Response Total
Edgware Road	31.4% (16)	29.4% (15)	39.2% (20)	51
East Covent Garden	27.5% (14)	29.4% (15)	43.1% (22)	51
Mayfair	36.7% (18)	24.5% (12)	38.8% (19)	49
Victoria	42.0% (21)	22.0% (11)	36.0% (18)	50
			answered	52
			skipped	5

Matrix Charts

22.1. West End Buffer									Response Percent	Response Total
1	Yes								42.3%	22
2	No								28.8%	15
3	No opinion								28.8%	15
Statistics	Minimum	1	Mean	1.87	Std. Deviation	0.83	Satisfaction Rate	43.27	answered	52
	Maximum	3	Variance	0.69	Std. Error	0.12				

22.2. Queensway/Bayswater									Response Percent	Response Total
1	Yes								33.3%	17
2	No								29.4%	15
3	No opinion								37.3%	19
Statistics	Minimum	1	Mean	2.04	Std. Deviation	0.84	Satisfaction Rate	51.96	answered	51
	Maximum	3	Variance	0.7	Std. Error	0.12				

22.3. Edgware Road								Response Percent	Response Total	
1	Yes							31.4%	16	
2	No							29.4%	15	
3	No opinion							39.2%	20	
Statistics	Minimum	1	Mean	2.08	Std. Deviation	0.84	Satisfaction Rate	53.92	answered	51
	Maximum	3	Variance	0.7	Std. Error	0.12				

22.4. East Covent Garden								Response Percent	Response Total	
1	Yes							27.5%	14	
2	No							29.4%	15	
3	No opinion							43.1%	22	
Statistics	Minimum	1	Mean	2.16	Std. Deviation	0.83	Satisfaction Rate	57.84	answered	51
	Maximum	3	Variance	0.68	Std. Error	0.12				

22.5. Mayfair								Response Percent	Response Total	
1	Yes							36.7%	18	
2	No							24.5%	12	
3	No opinion							38.8%	19	
Statistics	Minimum	1	Mean	2.02	Std. Deviation	0.87	Satisfaction Rate	51.02	answered	49
	Maximum	3	Variance	0.75	Std. Error	0.12				

22.6. Victoria								Response Percent	Response Total
1	Yes							42.0%	21
2	No							22.0%	11
3	No opinion							36.0%	18

22.6. Victoria								Response Percent	Response Total	
Statistics	Minimum	1	Mean	1.94	Std. Deviation	0.88	Satisfaction Rate	47	answered	50
	Maximum	3	Variance	0.78	Std. Error	0.12				

23. If you have any comments about the reasoning, boundary and designation of these zones, please leave your comments below and specify which specific areas and aspects you are referring to: West End Queensway/Bayswater Edgware Road East Covent Garden Mayfair Victoria

			Response Percent	Response Total
1	Open-Ended Question		100.00%	20
1	12/10/2020 19:07 PM ID: 150000861	Changes to the allocation of these zones should not be segregated. All of done 1 ie the zone of the circle line should be considered as 1 zone.		
2	12/10/2020 19:13 PM ID: 150002896	Have very strict rules in Victoria area		
3	12/10/2020 19:42 PM ID: 150000476	As I've previously stated.		
4	12/10/2020 19:44 PM ID: 150004612	Bayswater and Queensway had a recent rise in drug abuse, nighttime parties, and noise due to many hotel-like businesses within residential streets for example in Inverness Terrace, where some of the houses are converted into hotels without hotel like control. This has caused a constant source of disturbance for the families.		
5	13/10/2020 03:54 AM ID: 150016287	See main comment re creating a Special Consideration Zone for all of Park Lane. Whether that is to be considered as part of Mayfair or as separate is a matter for the Council - whatever works best to allow major hospitality along an exceptional tree-lined public space that is west-facing onto Hyde Park. If there is a place with greater potential to be first class public realm, anywhere in the world, I am not aware of it. Two-way traffic existed on East Carriage Drive from at least 1799 to the 1960s. It's time to reinstate two-way traffic on East Carriage Drive, and remove all motor traffic from what was traditionally called Park Lane - the Mayfair side (currently the southbound carriageway). Access to Mayfair would be provided at all streets, as happens with most boulevards. Two-way traffic has been reinstated on Baker Street, Gloucester Place, Portman Square, Piccadilly, Pall Mall, St James's Street, and Tottenham Court Road. Why? Because it works best. TfL's retention of one-way traffic on each side of Park Lane is repeating the major strategic error that was made in the 1960s, and is a disaster for Park Lane. A far higher standard of urban planning is required, urgently.		
6	13/10/2020 12:47 PM ID: 150037782	Queensway and Bayswater and Edgware Road down to Paddington have very high levels of drug dealing, drug taking, street prostitution both soliciting and sexual activities in the streets, squares, mews and small hotels, robberies and		

23. If you have any comments about the reasoning, boundary and designation of these zones, please leave your comments below and specify which specific areas and aspects you are referring to: West End Queensway/Bayswater Edgware Road East Covent Garden Mayfair Victoria

			Response Percent	Response Total
		kerb crawling. These activities bring in lots of opportunistic criminals and it is not safe for women to walk down Sussex Gardens or in neighbouring streets after dark. I have been chased by men in hoodies, suffered kerb crawling harassment and cat calling, as have my teenage daughters. These are not reported crimes because the police aren't interested until it's too late. It is essential you keep these areas under a CIZ to prevent deterioration. The police are understaffed and unresponsive to low level crime already so the problem is not under control.		
7	13/10/2020 20:38 PM ID: 150040177	Victoria: A lot of anti-social behaviour happens closer to the river but is frequently not as a direct result of licensed premises in the area. I don't know how or if the zone could be extended without unfairly penalizing more well-run premises in the area.		
8	24/10/2020 08:39 AM ID: 150948880	If excluded otherwise I favour zones in Queens way, bayswater and Edgware Road		
9	13/11/2020 15:01 PM ID: 152367343	Please see response above in Q21.		
10	13/11/2020 17:34 PM ID: 152298169	Regarding the Mayfair area - it should not be too hard to work out the reasons for the incidents in the three/four identified streets given the nature of general activity around that area. I do not think the CIA study was very convincing or demonstrated sufficient analysis to come to this conclusion.		
11	13/11/2020 17:41 PM ID: 151148200	<p>We strongly oppose Victoria's designation as a Special Consideration Zone for the following reasons:</p> <p>- The consultation document states that ""The addition of a significant number of new licensed premises in the area over the past three years does mean that this area is seeing increased levels of incidents. The overall incident types rate for this area was nearly two times the borough average."" (p27). However, we note the Cumulative Impact Assessment finds that the: "Victoria area hosts transport networks of significance to London, regionally and nationally. It is among the busiest stations in the evening and night, as well as on weekends. This presents a challenge to ascertain whether the concentration of licensed premises are key drivers of incidents recorded over the last three years, or whether other factors are of greater significance." (p131). The assessment goes on to state that: "...service experts and city inspectors suggest that much of these patterns are attributable to the travel of night-time revellers coming from elsewhere in the city." (p113), and that: "...this area cannot be conclusively characterised by cumulative impact attributable to the concentration or types of licensed premises in the area." (p113). Given the comments of the service experts and city inspectors, the evidence base</p>		

23. If you have any comments about the reasoning, boundary and designation of these zones, please leave your comments below and specify which specific areas and aspects you are referring to: West End Queensway/Bayswater Edgware Road East Covent Garden Mayfair Victoria

			Response Percent	Response Total
		<p>underpinning Victoria's designation as a SCZ is inconclusive and does not justify Victoria's inclusion as a SCZ.</p> <ul style="list-style-type: none"> - Among other data, the CIA draws upon British Transport Police data. BTP has previously clarified to us that a crime reported at BTP Victoria Station does not necessarily mean that it happened in Victoria. People travelling on public transport may often report crimes when they reach their destination where service staff and support are more likely to be readily available. The BTP data is unlikely therefore to be fully representative of where incidents have taken place (for example, an incident may have taken place on a train outside London during a cross country journey) and its inclusion distorts the picture. - Victoria is, unfortunately, no stranger to pickpocketing gangs and incidences of drug dealing. The area's known rough sleeping problem can, in some instances, also give rise to ASB issues. We would submit that some of incidents referred to in the CIA would have occurred regardless of the presence of licensed premises. - The CIA refers to the transport hub in Victoria. The interchange is very likely skewing data given it is a major transport destination that draws in commuters and others alike from elsewhere. It is a multi-modal transport hub and includes the Victoria line which forms part of the 24-hour Night Tube. Incidents that are contained within, or around the station may not originate from licensed premises in Victoria. It is worth noting that where this influx causes incidents, these may already be having a detrimental impact on the night time economy through negatively affecting the place perception of Victoria. - For Victoria, where more businesses are forced to close as a result of increased measures this would be to the further detriment of the Victoria Opportunity Area where licensed venues and premises support the ongoing success of Victoria not only as a business hub but also as a community. <p>As a result of the above we strongly oppose Victoria's designation as a Special Consideration Zone.</p>		
12	14/11/2020 12:37 PM ID: 152424557	<p>West End Buffer</p> <p>The Northbank BID does not support Zone 2 designation as a Special Consideration Zone for the following reasons:</p> <ul style="list-style-type: none"> → The consultation document states that ""This area is closely associated with dispersal due to the lar number of transport hubs; which include a national rail station, a number of underground stations and large numbers of night bus routes."" (p24). This presents a challenge to ascertain whether the concentration of licensed premises are key drivers of incidents recorded over the last three years, or whether other factors are of greater significance. → The CIA draws upon British Transport Police data. BTP has previously suggested that a crime reported at a Station does not necessarily mean that it 		

23. If you have any comments about the reasoning, boundary and designation of these zones, please leave your comments below and specify which specific areas and aspects you are referring to: West End Queensway/Bayswater Edgware Road East Covent Garden Mayfair Victoria

			Response Percent	Response Total
		<p>happened in the area. People travelling on public transport may often report crimes when they reach their destination where service staff and support are more likely to be readily available.</p> <p>→ The CIA refers to the transport hubs in Zone 2 and the multiple busy interchanges are likely to skewing data due to the numbers of people travelling. Zone 2 is a multi-modal transport hub and includes the many 24 hour tube and bus routes.</p> <p>Incidents reported in the area may not originate from licensed premises in the area.</p> <p>The BID is working to support high quality hospitality sector and the restrictions will bring additional challenges to them.</p>		
13	14/11/2020 17:50 PM ID: 152441492	As mentioned earlier, we live in Berkeley street, Mayfair. The designation of Special Consideration Zone is a positive step for residents, although we are of the view that Berkeley street should be a cumulative impact area in its own right. The Hadfield Study in 2016 which suggested designation as a cumulative impact area for Berkeley street, had considerably more observational data.		
14	14/11/2020 17:57 PM ID: 152445317	As mentioned earlier, we live in Berkeley street, Mayfair. The designation of Special Consideration Zone is a positive step for residents, although we are of the view that Berkeley street should be a cumulative impact area in its own right. The Hadfield Study in 2016 which suggested designation as a cumulative impact area for Berkeley street, had considerably more observational data.		
15	14/11/2020 19:29 PM ID: 152448869	Some of these areas are low residential areas and therefore would have minimal impact to residents if new licences or variations were granted.		
16	15/11/2020 13:44 PM ID: 152468159	No		
17	15/11/2020 15:28 PM ID: 151604949	All SCZs are being introduced at a time when such is inappropriate and evidence is not longer relevant.		
18	15/11/2020 16:11 PM ID: 152478097	It is totally unnecessary and anti business		
19	15/11/2020 16:19 PM ID: 152449399	We feel it's up to the amenity groups in those areas as they will be aware of the consequences, but we disagree with Edgware Road & Bayswater as that would dominate the current CIA's.		
20	15/11/2020 21:44 PM ID: 152485251	The West End Buffer, Queensway, Edgware Rd and East Covent Garden and Mayfair should be Cumulative Impact Areas		

23. If you have any comments about the reasoning, boundary and designation of these zones, please leave your comments below and specify which specific areas and aspects you are referring to: West End Queensway/Bayswater Edgware Road East Covent Garden Mayfair Victoria

	Response Percent	Response Total
	answered	20
	skipped	37

11. I. Revised framework for Premises Use policies and updates to policy narrative

24. Regarding the following establishments, do you agree with the revisions to the policy framework for...?

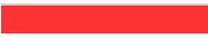
	Yes	No opinion	No	Response Total
Restaurants - Policy RTN1	55.1% (27)	28.6% (14)	16.3% (8)	49
Fast Food Premises - Policy FFP1	43.5% (20)	32.6% (15)	23.9% (11)	46
Public Houses and Bars - Policy PB1	41.7% (20)	29.2% (14)	29.2% (14)	48
Off sales of alcohol – Policy OS1	47.9% (23)	33.3% (16)	18.8% (9)	48
Music and dance premises and similar entertainment - Policy MD1	39.6% (19)	33.3% (16)	27.1% (13)	48
Hotels - Policy HOT1	45.8% (22)	37.5% (18)	16.7% (8)	48
Casinos - Policy CAS1	41.7% (20)	33.3% (16)	25.0% (12)	48
Combined Use Premises	43.8% (21)	35.4% (17)	20.8% (10)	48
			answered	49
			skipped	8

Matrix Charts

24.1. Restaurants - Policy RTN1			Response Percent	Response Total
1	Yes		55.1%	27

24.1. Restaurants - Policy RTN1								Response Percent	Response Total	
2	No opinion							28.6%	14	
3	No							16.3%	8	
Statistics	Minimum	1	Mean	1.61	Std. Deviation	0.75	Satisfaction Rate	30.61	answered	49
	Maximum	3	Variance	0.56	Std. Error	0.11				

24.2. Fast Food Premises - Policy FFP1								Response Percent	Response Total	
1	Yes							43.5%	20	
2	No opinion							32.6%	15	
3	No							23.9%	11	
Statistics	Minimum	1	Mean	1.8	Std. Deviation	0.8	Satisfaction Rate	40.22	answered	46
	Maximum	3	Variance	0.64	Std. Error	0.12				

24.3. Public Houses and Bars - Policy PB1								Response Percent	Response Total	
1	Yes							41.7%	20	
2	No opinion							29.2%	14	
3	No							29.2%	14	
Statistics	Minimum	1	Mean	1.88	Std. Deviation	0.83	Satisfaction Rate	43.75	answered	48
	Maximum	3	Variance	0.69	Std. Error	0.12				

24.4. Off sales of alcohol – Policy OS1								Response Percent	Response Total
1	Yes							47.9%	23
2	No opinion							33.3%	16
3	No							18.8%	9

24.4. Off sales of alcohol – Policy OS1									Response Percent	Response Total
Statistics	Minimum	1	Mean	1.71	Std. Deviation	0.76	Satisfaction Rate	35.42	answered	48
	Maximum	3	Variance	0.58	Std. Error	0.11				

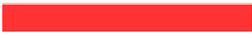
24.5. Music and dance premises and similar entertainment - Policy MD1									Response Percent	Response Total
1	Yes								39.6%	19
2	No opinion								33.3%	16
3	No								27.1%	13
Statistics	Minimum	1	Mean	1.88	Std. Deviation	0.81	Satisfaction Rate	43.75	answered	48
	Maximum	3	Variance	0.65	Std. Error	0.12				

24.6. Hotels - Policy HOT1									Response Percent	Response Total
1	Yes								45.8%	22
2	No opinion								37.5%	18
3	No								16.7%	8
Statistics	Minimum	1	Mean	1.71	Std. Deviation	0.73	Satisfaction Rate	35.42	answered	48
	Maximum	3	Variance	0.54	Std. Error	0.11				

24.7. Casinos - Policy CAS1									Response Percent	Response Total
1	Yes								41.7%	20
2	No opinion								33.3%	16
3	No								25.0%	12
Statistics	Minimum	1	Mean	1.83	Std. Deviation	0.8	Satisfaction Rate	41.67	answered	48
	Maximum	3	Variance		Std. Error					

24.7. Casinos - Policy CAS1							Response Percent	Response Total
Maximum	3	Variance	0.64	Std. Error	0.12			

24.8. Combined Use Premises							Response Percent	Response Total		
1	Yes						43.8%	21		
2	No opinion						35.4%	17		
3	No						20.8%	10		
Statistics	Minimum	1	Mean	1.77	Std. Deviation	0.77	Satisfaction Rate	38.54	answered	48
	Maximum	3	Variance	0.59	Std. Error	0.11				

25. Do you agree with the proposal to rename the Nudity, striptease and sex related entertainment – Policy NS1 to Sex Cinemas and Sexual Entertainment Venues – Policy SCEV1?							Response Percent	Response Total		
1	Yes						53.19%	25		
2	No opinion						36.17%	17		
3	No						10.64%	5		
Statistics	Minimum	1	Mean	1.57	Std. Deviation	0.68	Satisfaction Rate	28.72	answered	47
	Maximum	3	Variance	0.46	Std. Error	0.1			skipped	10

26. If you have any comments about the proposed revisions to the policy framework of the following establishments, please provide them below and specify which policies and aspects you are referring to: Restaurants - Policy RTN1 Fast Food Premises - Policy FFP1 Public Houses and Bars - Policy PB1 Off sales of alcohol – Policy OS1 Music and dance premises and similar entertainment - Policy MD1 Hotels - Policy HOT1 Casinos - Policy CAS1 Combined Use Premises							Response Percent	Response Total
1	Open-Ended Question						100.00%	19

26. If you have any comments about the proposed revisions to the policy framework of the following establishments, please provide them below and specify which policies and aspects you are referring to: Restaurants - Policy RTN1 Fast Food Premises - Policy FFP1 Public Houses and Bars - Policy PB1 Off sales of alcohol – Policy OS1 Music and dance premises and similar entertainment - Policy MD1 Hotels - Policy HOT1 Casinos - Policy CAS1 Combined Use Premises

			Response Percent	Response Total
1	12/10/2020 19:13 PM ID: 150002896	Shut all ""nudity"" venues		
2	12/10/2020 19:42 PM ID: 150000476	<p>RTN1 C. 3. - this reads as though restaurants are not allowed to provide takeaway services. For those of us who live near to restaurants, lots of us like to just grab our favourite dishes and take them round the corner to have them in the comfort of their own home. I'm sure you like to do that too. Was this policy developed by anyone who actually lives in Westminster? Why on earth would you want to stop restaurants offering takeaway services? And will this apply to established restaurants as well as new ones? If not, that will put new restaurants at a massive disadvantage when trying to establish a local customer base. We don't always want to have to sit in a restaurant to eat a nice dinner, sometimes we just want to eat nice dinners on the sofa with our families. We occasionally quite like to have a bottle of wine with our meals too - and you would prevent a restaurant selling us one of those with our meal to have at home too.</p> <p>FFP1 C. 1 & D. 1. please note my previous objections to aspects of the policies mentioned in those lists.</p> <p>FFP1 also seems like a missed opportunity to include some aspects of the London-wide Healthier Catering Commitment in licensing conditions for takeaway premises - but with obesity increasingly high on the Government's priority list as a political concern, to protect the NHS and public services from its costs, shouldn't local authorities be doing what they can to support healthier food options being more widely available? The Commitment doesn't stop unhealthy food being served, but it balances it out with healthy options too. A sad omission from Westminster Council here.</p> <p>PB1 - same objections to specific aspects as before.</p> <p>MD1 - same as before - we really need to learn our lesson from other boroughs that have made nightlife dull and unexciting. Don't kill the few clubs we have left - the pandemic is ravaging them, and these policies will deliver the final blow to whichever survive.</p> <p>HOT1 - C. - does this definition of hotels include AirBnBs? it certainly seems to. I would support that!</p> <p>For other sections please see my prior reasoning for objecting to and criticising specific aspects of the policies.</p>		

26. If you have any comments about the proposed revisions to the policy framework of the following establishments, please provide them below and specify which policies and aspects you are referring to: Restaurants - Policy RTN1 Fast Food Premises - Policy FFP1 Public Houses and Bars - Policy PB1 Off sales of alcohol – Policy OS1 Music and dance premises and similar entertainment - Policy MD1 Hotels - Policy HOT1 Casinos - Policy CAS1 Combined Use Premises

			Response Percent	Response Total
3	13/10/2020 09:38 AM ID: 150020804	As stated previously, while limiting hours is one tool and I think makes sense outside of the West End, inside the west end, I don't agree.		
4	13/10/2020 12:47 PM ID: 150037782	Think about if you lived there yourself. Walk around the areas at night yourself.		
5	13/10/2020 20:38 PM ID: 150040177	Very difficult to judge, as unable to easily compare current policy framework and proposed policy framework at a glance.		
6	24/10/2020 17:30 PM ID: 150975443	You need to have a framework which is not based on the notion that you might only open a premises if you can demonstrate you can meet these 100 or so very subjective criteria.		
7	11/11/2020 17:19 PM ID: 152172014	I think the off-sales policy OS1 that applies in the WECIA should also apply in the West End buffer zone SCZ. I do not support long hours for casinos as I do not support long hours for the addictive activity of gambling which can cause great personal and social harm especially if facilitated by the consumption of alcohol. I think a premises licence for gambling should have at least a period of 6 hours in any 24 when alcohol is not available to sale.		
8	12/11/2020 14:19 PM ID: 152273419	to		
9	13/11/2020 12:17 PM ID: 152348366	See earlier comments regarding the restrictive terminal hour for new applications within the CIZ. As a further point, what has been demonstrated elsewhere is that designating premises according to their use limits the ability for innovation and experiential uses or pop-ups. In such cases, innovative new uses rarely fit into a designated category and we would ask Westminster to consider how they may approach applications from such premises in the future if we are to continue to encourage innovation, avoid vacant units and promote the evolution of the evening and night-time economy.		
10	13/11/2020 15:01 PM ID: 152367343	See earlier comments regarding the restrictive terminal hour for new applications within the CIZ and rationale for additional restrictions in the SCZs to address issues which are not a result of the evening and night-time economy in those areas. As a wider point, we are concerned that at present the policies for hotels do not		

26. If you have any comments about the proposed revisions to the policy framework of the following establishments, please provide them below and specify which policies and aspects you are referring to: Restaurants - Policy RTN1 Fast Food Premises - Policy FFP1 Public Houses and Bars - Policy PB1 Off sales of alcohol – Policy OS1 Music and dance premises and similar entertainment - Policy MD1 Hotels - Policy HOT1 Casinos - Policy CAS1 Combined Use Premises

			Response Percent	Response Total
		<p>recognise the important role that security teams at many hotels play in the CIZ, SCZ and across the borough. Often operating 24/7 the security teams play an important role in looking after vulnerable individuals in an evening or late at night, are active on local security radio networks, have a positive effect on the wider community and assist in terrorist and emergency situations. As a result, we consider this should be recognised in the policy, with encouragement and support to continue to operate to later hours where possible.</p> <p>As a final point, what has been demonstrated in other authorities is that designating premises according to their use limits the ability for innovation and experiential uses or pop-ups. In such cases, innovative new uses rarely fit into a designated category and we would ask Westminster to consider how they may approach applications from such premises in the future if we are to continue to encourage innovation, avoid vacant units and promote the evolution of the evening and night-time economy.</p>		
11	13/11/2020 17:34 PM ID: 152298169	<p>The revisions do not make reference to any requirement for accessibility for those with a disability.</p> <p>Is there any requirement on gender specific, transgender, unisex, disabled toilet facilities, or any issues that may arise?</p>		
12	13/11/2020 17:41 PM ID: 151148200	n/a		
13	14/11/2020 12:37 PM ID: 152424557	n/a		
14	15/11/2020 12:52 PM ID: 152470624	<p>In MD1 the reference to Clause D in B(4) should in fact be to Clause E.</p> <p>We believe that HOT1 needs to take into account the scale of the licensable areas (bars, restaurant etc) which are open to non-residents compared to the scale of the hotel. A hotel with 100 rooms and capacity for 500 people in the various licensable areas could also be regarded as a combined use premise. It is unclear on the point at which the sale of alcohol etc stops being ancillary to the primary purpose as a hotel.</p>		
15	15/11/2020 13:44 PM ID: 152468159	<p>Fast Food - Policy FFP1 and Public Houses and Bars - Policy FFP1 and Music and dance premises and similar entertainment - Policy MD1</p> <p>Where before the presumption was to refuse applications this change in policy allows NEW premises licences between these hours and then apply for a variation to extend.</p>		

26. If you have any comments about the proposed revisions to the policy framework of the following establishments, please provide them below and specify which policies and aspects you are referring to: Restaurants - Policy RTN1 Fast Food Premises - Policy FFP1 Public Houses and Bars - Policy PB1 Off sales of alcohol – Policy OS1 Music and dance premises and similar entertainment - Policy MD1 Hotels - Policy HOT1 Casinos - Policy CAS1 Combined Use Premises

			Response Percent	Response Total
		Casinos - Policy CAS1 : concerned the policy states these will generally be granted, these are large premises with lat night licences and would add to CI I the West End.		
16	15/11/2020 15:28 PM ID: 151604949	Hotels and Combined use premises should be subject to policies that actively promote their establishment in areas where there are considered to be an excess of ""pubs, clubs and bars"".		
17	15/11/2020 16:11 PM ID: 152478097	I believe music and dancing venues should be considered as cultural venues. Many are grassroots music venues and places where new music, diversity, and culture exist.		
18	15/11/2020 16:19 PM ID: 152449399	No 25: The 2016 SLP iv) has been removed from this revision, (iv) 'The Licensing Authority will have regard to the cumulative effect of the number of such premises, and sexual entertainment venues, in proximity to each other in the vicinity', and should be reinstated within the CIA. RTN1 'table meal' needs defining as often misused; FFP1: shou;d revert to the previous 'refuse all applications other than to vary hours within the core hours policy.' PB1: In effect this is a relaxation in policy and will increase drink led operations including workplace bars and retail shops establishing evening bars as 'members clubs', within the CIA MD1: 2016 states 'policy to refuse applications in the CIA, other than applications to vary hours within core hours.' HOT1: would be better placed under COMB1 as they all have bars & restaurants open to the public & can therefore add to CI. CAS1: The presumption to grant these 24/7 operations within the CIA can only add to cumulative impact & should therefore be subject to a more rigorous policy.		
19	19/11/2020 11:36 AM ID: 152316500	Not possible to find what policies are without spending three days.		
			answered	19
			skipped	38

27. Do you agree with the proposal to replace Theatres, Cinemas, other performance venues and Qualifying Clubs - Policy PVC1 with the following two new policies: Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Space – Policy CCSOS1 Qualifying Club – Policy QUC1

									Response Percent	Response Total
1	Yes								46.00%	23
2	No opinion								36.00%	18
3	No								18.00%	9
Statistics	Minimum	1	Mean	1.72	Std. Deviation	0.75	Satisfaction Rate	36	answered	50
	Maximum	3	Variance	0.56	Std. Error	0.11			skipped	7

28. If you have any comments about the proposals to replace Policy PVC1 with the two new policies (Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Space – Policy CCSOS1 and a Qualifying Club – Policy QUC1) please provide them below and specify which policies and aspects you are referring to:

				Response Percent	Response Total
1	Open-Ended Question			100.00%	15
1	12/10/2020 19:07 PM ID: 150000861	By changing Poicy QUC1 promotes discrimination			
2	12/10/2020 19:42 PM ID: 150000476	As above. It seems the bulk of this document was prepared before the pandemic and its impact on our cultural economy became apparent. As a resident of the borough I know council officers have a strong tendency to ignore concerns unless they come from residents who are friendly with the great and the good in its cabinet. However, I would plead with you to consider the implications of forcing through these changes after the devastation of our cultural sector by the pandemic, and to reconsider whether or not to make these changes.			
3	13/10/2020 03:54 AM ID: 150016287	Outdoor Space: please refer to my main comment regarding creating an exceptional Outdoor Space that could be used for hospitality, along all of Park Lane - west facing onto Hyde Park. If Park Lane was made into a tree-lined pedestrian-friendly place, it would become part of a Scenic Route all the way from Trafalgar and Parliament Squares to Marble Arch. The majority of these Scenic Routes is already there: The Mall, St James's Park, Buckingham Palace, Green Park, and Constitution Hill. If Park Lane were to become a green and pleasant place, the Scenic Route to and from Marble Arch would be complete.			
4	13/10/2020 20:38 PM ID: 150040177	It is right that qualifying clubs (e.g. members' bars) be separated out, as many of them operate after-hours specifically for their members (e.g. the Phoenix Theatre Bar for West End performers and crew) and may therefore require more distinct criteria to regular bars and clubs. I honestly can't see what relevance policy CH1 has with regard to such establishments.			

28. If you have any comments about the proposals to replace Policy PVC1 with the two new policies (Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Space – Policy CCSOS1 and a Qualifying Club – Policy QUC1) please provide them below and specify which policies and aspects you are referring to:

			Response Percent	Response Total
		<p>It is mentioned that comedy clubs are considered as Cultural Venues; however, only a few are standalone premises and many are rooms above or below pubs or performance spaces within theatre buildings. Would there not be some wisdom in further clarifying this? Regardless, policy CH1 would again not be relevant to these clubs unless they were hosting all-ages shows at weekends or school events during the week, but clearly a theatre would have different licensing requirements to a pub, so how would that affect comedy or acoustic music clubs that run in rooms within each type of establishment?</p> <p>I am also concerned about the current proposals in Scotland to criminalize hate speech that will inevitably lead to comedians and other public speakers being prosecuted for performing their acts, or simply answering questions or discussing matters freely in a public forum. There is a real risk, should Labour win the next General Election, that their leader, a former DPP, will wish to follow suit, should Scotland adopt these proposals as law. That in turn, I feel, will lead to the re-establishment of an office not dissimilar to the old Lord Chamberlain's Office (although without the support of the current Lord Chamberlain, who has better things to do), effectively bringing back the sort of theatre censorship last seen in 1968. This would kill comedy clubs overnight; the few that survive would have to become members' clubs. Whatever policies are adapted in the coming months for comedy venues MUST therefore be 100% future-proof, working to a worst-case scenario, and there must be no loopholes that can be exploited by any future government to hasten the demise of such clubs. These clubs must be given the greatest possible chance to fight their corner, preferably with the support of local authorities, if the worst should happen.</p>		
5	11/11/2020 15:38 PM ID: 152194841	Policy for events should differentiate between venues which typically host runs of events (e.g. theatres) and those which typically host one off or short run events. This is because the potential for nuisance from loading and unloading after core hours end is much greater in the latter (more such occasions in any given period) than the former.		
6	12/11/2020 14:19 PM ID: 152273419	have you considered the cost of these proposals, changes. This is not the time for these proposals		
7	13/11/2020 12:17 PM ID: 152348366	As outlined above, this is a very welcome reform, given that the Cumulative Impact Assessment has proven that cinemas, cultural venues, outdoor space and qualifying clubs are invariably well-managed and do not impact upon the licensing objectives. The additional flexibilities offered are therefore welcome, although we would suggest the proposed terminal hour for qualifying clubs remains too restrictive and would ask that greater clarity be provided as to the hours during		

28. If you have any comments about the proposals to replace Policy PVC1 with the two new policies (Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Space – Policy CCSOS1 and a Qualifying Club – Policy QUC1) please provide them below and specify which policies and aspects you are referring to:

			Response Percent	Response Total
		which cinemas and cultural venues can continue to provide alcohol (as long as this is ancillary to their main purpose).		
8	13/11/2020 15:01 PM ID: 152367343	This is a very welcome reform, given that the Cumulative Impact Assessment has proven that cinemas, cultural venues, outdoor space and qualifying clubs are invariably well-managed and do not impact upon the licensing objectives. The additional flexibilities offered are therefore welcome, although we would suggest the proposed terminal hour for qualifying clubs remains too restrictive and would ask that greater clarity be provided as to the hours during which cinemas and cultural venues can continue to provide alcohol (as long as this is ancillary to their main purpose).		
9	13/11/2020 17:34 PM ID: 152298169	For Qualifying Clubs - is there any requirement not to discriminate against any group wishing to become a member?		
10	13/11/2020 17:41 PM ID: 151148200	We feel that more could be done to support theatres in the proposed policy. The sale by retail of alcohol and/or late-night refreshment after 23:00hrs should not be limited to customer, patrons or members of the audience who will or have made use of venue for enjoying plays or other dramatic performances. Instead, theatres should be given the scope to put on other events - such as lectures or community events for example - with the same licensing approach as for plays or other dramatic performances also being permitted to support these offers.		
11	14/11/2020 12:37 PM ID: 152424557	We would like to see more support for theatres in the proposed policy. The sale by retail of alcohol and/or late-night refreshment after 23:00hrs should not be limited to customer, patrons or members of the audience who will or have made use of venue for enjoying plays or other dramatic performances. Instead, theatres should be given the scope to put on other events - such as lectures or community events for example - with the same licensing approach as for plays or other dramatic performances also being permitted to support these offers.		
12	15/11/2020 12:52 PM ID: 152470624	In CCSOS1 we believe that B(5) – the requirement that sale of alcohol etc must be to patrons after 23:00 should also be included in A. This is stated in HRS1 (B15) – see answer to Q19 above and so we fail to see why in CCSOS1 the requirement only applies in the CIZ.		
13	15/11/2020 13:44 PM ID: 152468159	Cinemas, Cultural Venues, Live Sporting premises and Outdoor Space - Policy CCSOS1 Within the West End CIZ I am concerned that this is a relaxation in policy and allows drinking at venues for people attending an event post 23:00 and for those not attending the event it creates a new bar where people can drink until 23:00. Qualifying Clubs - Policy QUC1: The policy needs to clearly state the distinction		

28. If you have any comments about the proposals to replace Policy PVC1 with the two new policies (Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Space – Policy CCSOS1 and a Qualifying Club – Policy QUC1) please provide them below and specify which policies and aspects you are referring to:

			Response Percent	Response Total
		between qualifying clubs and proprietary clubs which will be considered under Public House and Bars -PB1.		
14	15/11/2020 16:11 PM ID: 152478097	The definition should be expanded to clearly include grassroots music venues, and the terminal hours policy should be removed to give these spaces flexibility to grow and survive.		
15	15/11/2020 16:19 PM ID: 152449399	No to CCSOS1: Because many are large venues & this relaxation will negatively impact on amenity & public nuisance & crime & disorder. Yes to QUC1: but we feel there should be definitions of a) qualifying clubs, b) clubs owned by members, and c) proprietary clubs ,as c) tend to have late night events with TENS and in effect can be large bars. We support the Soho Society proposals to include: 'Qualifying clubs should not be confused with proprietary clubs, which are clubs run commercially by individuals, partnerships or businesses for the purposes of profit, these will be considered under the Public House and Bars Policy PB1'.		
			answered	15
			skipped	42

12. J. Minor statement updates to reflect changes in law, guidance or council policies

29. Do you agree with the Licensing Authority making minor changes to the statement to reflect updates to the law, guidance and council strategies or policies?

									Response Percent	Response Total
1	Yes								74.00%	37
2	No opinion								24.00%	12
3	No								2.00%	1
Statistics	Minimum	1	Mean	1.28	Std. Deviation	0.49	Satisfaction Rate	14	answered	50
	Maximum	3	Variance	0.24	Std. Error	0.07			skipped	7

30. If you have any comments regarding the updating of the statement, please provide them below:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	11
1	13/10/2020 03:54 AM ID: 150016287	Major changes should be considered, if needed, to create Park Lane as a major hospitality Outdoor Space venue.		
2	13/10/2020 20:38 PM ID: 150040177	It rather depends on what those changes will be.		
3	24/10/2020 17:30 PM ID: 150975443	you don't actually say what these are in 4.41 so how could any one answer yes or no		
4	13/11/2020 15:51 PM ID: 152367683	To reflect the updating, the reference to 'fire certificate' should be deleted from PS1 B 3		
5	13/11/2020 17:41 PM ID: 151148200	n/a		
6	14/11/2020 12:37 PM ID: 152424557	n/a		
7	15/11/2020 12:52 PM ID: 152470624	We understand the need to update the Statement in the midst of the current crisis. The statement, and especially the decision not to expand the ClZ, needs to be kept under review. If, as we hope, a vaccine is developed it may be that a return to "normal" will take place well before the next required Policy Review. This bring the risk that Cumulative Impact will happen without the Policy protections to prevent it.		
8	15/11/2020 13:44 PM ID: 152468159	None		
9	15/11/2020 15:30 PM ID: 152165406	Given the current climate, it will be important to keep the WCC Licensing Policy under review. The future is likely to remain uncertain over the next eighteen months or so, and we believe that it would not be appropriate to put the revised Licensing Policy in place for the usual three year period given the challenges that businesses will face as we emerge from the health crisis. We believe that that WCC should review its Licensing Policy again within a 12 month period, alongside its Cumulative Impact Policy, in order to ensure that it is supporting and not inhibiting the recovery of the night-time economy in central London.		
10	15/11/2020 16:11 PM ID: 152478097	No comment		
11	15/11/2020 16:19 PM ID: 152449399	We strongly support the Soho Society's points under Q2 Implementation of a Cumulative Impact Policy: 'The application of the West End Cumulative Impact Policy since January 2016 whilst apparently strong on paper has failed to work in practice as a policy to prevent further cumulative impact in the West End, and all the points they raise in that section, and Q3 2020 Cumulative Impact Assessment. Our references to the CIA in our answers relate to the West End CIA.		

30. If you have any comments regarding the updating of the statement, please provide them below:

	Response Percent	Response Total
	answered	11
	skipped	46

13. K. Final comments on the proposed revisions to the Council's Statement of Licensing Policy

31. If you wish to make any other comments relating to the proposed revision of the Council's Statement of Licensing Policy, please do so below:

		Response Percent	Response Total
1	Open-Ended Question	100.00%	17
1	12/10/2020 19:07 PM ID: 150000861		The changes and directives that Westminster Council plans to do within these areas should also be evaluated
2	12/10/2020 19:42 PM ID: 150000476		You won't get a huge number of individual ordinary resident responses to this consultation, chiefly because of the format of the policy and this survey and the sheer level of effort you appear to expect from respondents. You really need to consider the end-user first when designing these surveys. I'm not convinced you actually want us to respond, because these things aren't designed in such a way to eliminate barriers and make it easy and straightforward for us to participate. Most of us are just normal people with normal lives, and it's only because I have an evening unexpectedly free that I have the time and energy to do this. Would you fill this out? Do you work out how long it will take us, and how much effort we will need to put in? Again, not inclusive, those of us with kids or other responsibilities rarely have the opportunity to bother with something like this. And for those of us with English as another language, or from lower income backgrounds, or who are old, or who are disabled, how do you make sure this is inclusive?
3	13/10/2020 20:38 PM ID: 150040177		This was described as a "short online survey". It has taken the best part of an afternoon to read 40 pages of complex text and dip into a second 154-page document in order to try and get to grips - perhaps unsuccessfully - with certain terminology. May I politely suggest that if you intend to consult residents about licensing in future that you do so in a clearer and more concise manner. The supporting documents are largely aimed at licensees and bureaucrats, and people with nothing better to do, and I'd be amazed if you receive more than a handful of responses from ordinary residents, particularly those in social housing.
4	24/10/2020 17:30 PM ID: 150975443		This really is not the right time to impose a raft of new, complex subjective checklists on potential new businesses.
5	11/11/2020 17:19 PM ID: 152172014		In my first answer I made clear that I do not believe the WECIA policy has been effective in reducing cumulative impact based on my personal experience of living

31. If you wish to make any other comments relating to the proposed revision of the Council's Statement of Licensing Policy, please do so below:

			Response Percent	Response Total
		<p>in Soho since 1968 and as a restaurant owner and licensee for 26 of those years. Although things are not as bad as the years around the millennium the adverse impacts of too many people and too much alcohol and drugs has had an adverse social impact of the area particularly in the evening and late at night. There is an increasingly clear difference between what is said and stated in policies to prevent harm and control cumulative impact (which is all better worded and evidence based than in the past) and what has actually occurred in practice.</p> <p>The Covid pandemic has had a devastating effect on the F&B industry at present but a sustainable solution when operating conditions return to normal will require Westminster City Council to ensure that they robustly apply the policies in the amended SLP.</p>		
6	12/11/2020 14:19 PM ID: 152273419	<p>No proposals for outside seating and alfresco dining. No proposal for designated areas to facilitate this.....I fear this is out of touch right now. Failure to have COVID 19 recovery plan and help will compromise many businesses, close businesses, create job losses and poverty.</p>		
7	13/11/2020 12:17 PM ID: 152348366	<p>We have commissioned a scoping study looking into the Evening and Night Time Economy in the Heart of London, with a view to eventually formulating an Evening and Night Time Strategy. Initial high-level engagement with local stakeholders returned feedback supporting the view that the extension of opening hours for cultural institutions such as theatres required careful planning, taking into account considerations such as licences and the amenity and wellbeing of night-shift workers.</p>		
8	13/11/2020 15:01 PM ID: 152367343	<p>As a general point, we are disappointed that the draft Statement of Licensing Policy does not provide sufficient focus on the benefits of the evening and night-time economy. This forms a core part of the economy of the West End and Central London and its international attraction. This is recognised by the Mayor's Office and continued promotion of London as a 24 hour City. In this respect, we would welcome the authority continuing to consider how the Statement of Licensing Policy can more actively assist in the road to economic recovery and promote growth for businesses within the CIZ and SCZ areas.</p> <p>As outlined above, we would also welcome more clarity through the policy on what licensed premises will be judged against when applying for a licence later than core hours, particularly outside of the CIZ, especially in relation to management and requirement that this covers the 'wider vicinity'.</p> <p>Finally, we would welcome confirmation that the use of licensable outside space will also be considered on its merits and against clear criteria. With wellness and outside space now a key consideration for businesses, particularly in a post Covid-19 world, we would ask that the authority seeks to promote this wherever possible,</p>		

31. If you wish to make any other comments relating to the proposed revision of the Council's Statement of Licensing Policy, please do so below:

			Response Percent	Response Total
		potentially with trial periods to allow for the premises to prove it can be well-managed.		
9	13/11/2020 17:41 PM ID: 151148200	<p>Licensed premises in Victoria and Victoria Westminster BIDs contribute to the increased vibrancy Victoria has witnessed since the last licensing policy review. Establishments within the NOVA development, the Market Halls and many others help bolster Victoria's appeal as an Opportunity Area generally and specifically support the success of the commercial office sector.</p> <p>The new Statement of Licensing Policy should provide a supporting framework for business whilst helping the council achieve its licensing aims. However, the evidence underpinning the SCZ Policy in Victoria is inconclusive and not fully justified. The proposal ignores the current challenging landscape the coronavirus pandemic has created for businesses and the bleak outlook facing businesses.</p>		
10	14/11/2020 12:37 PM ID: 152424557	<p>The Northbank BID area has high quality hospitality, theatres, cultural, universities, retail and other leisure industries. The area is the gateway to the West End which attracts visitors from around the world to enjoy the night life. We wish to nurture the best London offer for visitors to enjoy and we are passionate about ensuring that "offering" is of the highest quality; including evening and night experience which is safe and welcoming.</p> <p>The BID area is a busy multi transport hub for day and night travel. This includes many 24 hour tube and bus routes for buses, underground services. As such many people are traveling through the area while on their way to other areas in the West End.</p> <p>The BID prioritises area safety and we work to align priorities, resources and information by working closely with partners including is working closely with partners including: neighbouring area BID's, Met Police, BTP, business members, and Safer Business Network, GLA and Amy Lane, Night Czar.</p> <p>The Northbank BID welcomes and supports Westminster City Council's work to create an appropriate Licensing Statement Policy which recognises, that Covid has created extremely challenging times for the hospitality sector due to "the current unprecedented nature of the impact that COVID19 has had on footfall in the area, the Licensing Authority will not seek to impose an expansion of the West End Cumulative Impact Zone or introduce the presumption of refusal to other premises use types within this zone at this time. It is believed that this approach, at this time, will not impact the Council's duty to promote the Licensing Objectives. However, as the city recovers, visitor numbers increase, and associated incidents rise outside the current West End Cumulative Impact Zone, the Licensing Authority will review this approach."</p>		

31. If you wish to make any other comments relating to the proposed revision of the Council's Statement of Licensing Policy, please do so below:

			Response Percent	Response Total
		<p>Businesses currently need support and stability to enable them to plan for the challenging times in the short and mid term and beyond. A key part of that is providing continued regulatory stability and consistency by maintaining the existing policy approach which businesses and residents are familiar with.</p> <p>Businesses need to be able to adapt to the new trading environment to deliver central London recovery for a thriving economy.</p>		
11	14/11/2020 19:29 PM ID: 152448869	<p>The policy in general goes against the Mayor's Office and Night Czar's message that London is open for business and is a 24hr city. At a time when businesses (particularly in the West End) are at breaking point the policy does not assist in the road to recovery and does not promote growth for businesses that find themselves within the CIZ and SCZ areas.</p>		
12	15/11/2020 13:44 PM ID: 152468159	None		
13	15/11/2020 15:30 PM ID: 152165406	<p>Safer Business Network is currently working with Westminster City Council to set up a specific group under the Safer Westminster Partnership which will focus on communications with businesses in the West End and formalise the contribution of the work of the Safer WestEnd Business Crime Reduction Partnership to the aims and objectives of the Safer Westminster Partnership. With this in mind, we suggest that it would be helpful to include a reference to Safer WestEnd and the Safer Sounds Partnership in the Licensing Policy at Paragraph 1.2 as follows:</p> <p>""The Council works in close partnership with the Metropolitan Police Service to tackle crime and disorder within our evening and night-time economy and to provide a safe environment for those who live, work and visit our City. The Safer WestEnd Business Crime Reduction Partnership also works closely with businesses to tackle crime trends in the West End, while the Safer Business Network's Safer Sounds Partnership provides good practice advice and training to licensed premises.""</p>		
14	15/11/2020 16:11 PM ID: 152478097	<p>We believe that before Westminster Council further restricts licensed premises it should fully understand the effect of Covid on its existing businesses and potential new licence holders. The policy also needs to clearly specific grassroots music venues as an exempted type of licence premises. It also should acknowledge that also multi use arts and cultural venues need flexibility in licence activities and hours to survive especially even the financial pressures of trying to run and a manage a premises in Westminster even before Covid. The music venue trust is happy to provide any supporting data to Westminster if required. It needs to be recognised that live music venues are on the brink of extinction in Westminster so should carry greater protection.</p>		

31. If you wish to make any other comments relating to the proposed revision of the Council's Statement of Licensing Policy, please do so below:

			Response Percent	Response Total
15	15/11/2020 16:19 PM ID: 152449399	We wish to attach some documents relating to proper details being submitted in Operating Schedules. No legislation has been passed indicating that LA's should relax licensing policies because of Covid 19 & once relaxed we doubt if they will revert.		
16	15/11/2020 17:59 PM ID: 152483731	Maybe some emphasis on protecting jobs and the West End economy is needed in light of the recent experience with COVID19 pandemic impact on the Central London economy.		
17	15/11/2020 21:44 PM ID: 152485251	With the loss of control over building use created by Planning Use Class E and the decline in retail there is likely to be a significant increase in the number of licensed premises, it is therefore important that SCZ's and CIA's are kept under constant review.		
			answered	17
			skipped	40

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

			Response Percent	Response Total
1	Open-Ended Question		100.00%	9
1	24/10/2020 17:30 PM ID: 150975443	This really is not the right time to impose a raft of new, complex subjective checklists on potential new businesses.		
2	13/11/2020 17:41 PM ID: 151148200	n/a.		
3	14/11/2020 19:29 PM ID: 152448869	Proposals for the revision of Westminster City Council's Statement of Licensing Policy and the intention to publish its Cumulative Impact Assessment To whom it may concern Thank you for consulting with us on the proposals for the revision of the Westminster City Council Statement of Licensing Policy. Our responses to the questions are detailed below, however, our position is that with an uncertain future and the difficulties that the hospitality and entertainment sector face, that despite your reassurances that you are not implementing significant change and that you intend to continue with the current policy approach where possible this is not the case as there are a number of significant revisions that will negatively impact growth, business development and regeneration of the high street post-COVID when London, in particular, will need it most. Therefore, we are not generally		

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

	Response Percent	Response Total
<p>supportive of the amended Statement of Licensing policy, as we do not believe that it reflects the severity of the impact of COVID on trading conditions and usage of our town and city centres.</p> <p>We are most concerned about:</p> <p>1. The revised core hours policy:</p> <p>This is a substantial change to your approach. The current policy distinguishes between premises that offer alcohol and those that do not. We understand from your evidence alcohol is the main driver for the disorder and noise-related complaints. Whereas the new policy includes Fast Food Premises, and although we classify ourselves as a quick-service restaurant we are concerned that this wording is too broad and therefore could be used to include all restaurants. This is because of their current trading style, due to the impact of COVID legislation and the growth of delivery models most restaurants now offer self-seating, counter ordering, take away, disposable wrapping and crockery and pre-sealed for immediate consumption.</p> <p>We have substantial evidence to indicate that we reduce noise and disorder in the evening and night-time economy by:</p> <ul style="list-style-type: none"> • Providing a safe and welcoming, alcohol-free environment where those who do not drink alcohol can come and socialise, this is particularly important to diverse groups such as those who don't drink, late-night workers, women, under 18's, those on low incomes and minority ethnic groups. • Creating access to free toilets for disabled people • Hiring security staff above and beyond requirements • Delivering extensive training for our team in managing noise, safety and protecting children and vulnerable adults from harm • Dispersing people safely and well from the night time economy is an essential part of all policing strategies. XXXXXXX's is an essential component in this strategy, as people visiting our restaurants come to sober up or wait safely for transport and a study performed by XXXXXXXX indicated that people come into XXXXXXXX louder than they leave and they are also more sober which means that they can safely get home. This has a direct impact on reducing anti-social behaviour <p>We are concerned that the council is proposing to limit the trading potential for new businesses at a time when Central Government, the High Streets Task Force and Industry bodies have all indicated that approximately 45% of all hospitality businesses will be lost. Therefore, we believe that this policy is a stealth policy to cut late-night trading opportunities and prevent healthy 24-hour growth which conflicts with the Greater London Authority Mayor's vision of a 24-Hour London.</p> <p>We do not believe that this policy supports business recovery at a time when Westminster Council should be supporting the businesses that have been hardest</p>		

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

	Response Percent	Response Total

hit to maximise their trade and recover from COVID. This policy puts unnecessary strain on regeneration plans. Therefore, we do not support the proposal to automatically refuse applications based on the following conditions

a. Pubs and bars, Fast Food and Music and Dance venues (within the West End Cumulative Impact Zone): Monday to Sunday: 10:00 to 21:00

b. Pubs and bars, Fast Food and Music and Dance venues (outside the West End Cumulative Impact Zone):

- Monday to Thursday: 10:00 to 23:30
- Friday and Saturday: 10:00 to midnight
- Sunday: 12:00 to 22:30
- Sundays immediately before a bank holiday: 12:00 to midnight

2. The new Special Consideration Zone Policy (SCZ1): We do not support the proposal to put forward greater mitigation and controls than those which would normally be expected from premises, therefore creating a higher threshold to grant new applications, without the legal frameworks in place to support this. This appears to be a way of introducing a CIZ without going through the correct legal frameworks. Therefore, in our opinion, it puts unnecessary strain on new and existing businesses at a time when Westminster Council should be supporting businesses set up, thrive and grow.

3. Change of Emphasis: We have concerns on the change of emphasis to include Fast Food we do not believe that there is enough delineation between new operating standards between Fast Food and Restaurants due to new delivery and takeaway models and Centra Government COVID trading restrictions.

4. Differentiation of Fast Food: There is no evidence in the Cumulative Impact Assessment to suggest that Fast Food has a negative impact on Westminster. Therefore, the differentiation is not supported by any facts. We would like to understand what consultations Westminster Council has performed relating to Fast Food and Quick Service Restaurants to reach the conclusion that they have a negative impact and therefore need to be treated differently.

5. Lack of Evidence: The Cumulative Impact Assessment and changes to the Statement of Licensing Policy lack recent and relevant evidence, creating insufficient inquiry relating to the proposed changes. Therefore, we do not believe that there is enough evidence to make decisions on these expansions and contractions as there is no evidence from the COVID era or future projections, and therefore we do not believe that a reasonable judgement can be reached.

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

	Response Percent	Response Total
<p>6. Consultation: There are clear guidelines in the Section 128 guidance in paragraph 14.4 on the consultation process. As a multinational operator with multiple XXXXXXXX Restaurants both inside and outside the Cumulative Impact Zones, we believe that there has been an insufficient enquiry into the Policy. Further time should have been given due to the closure of premises during the consultation period, due to Central Government implementing Lockdown2 and closing licensed premises, and closure of head offices where the consultation was sent to. This is further backed up by the evidence given, all the evidence to support the Licensing Policy and CIP is pre-COVID evidence and therefore has not taken into consideration the full impact of COVID on the hospitality industry. Further considerations need to be given to</p> <p>a. Tourism footfall: this is unlikely to restart until a vaccine is found and provided effective, it would take 12-24 months for tourism footfall to recover</p> <p>b. Workforce: the majority of large businesses have indicated that they are unlikely to return their workforce to offices post-COVID, with many downsizing or removing offices as their teams have worked effectively from home. Therefore, pre-COVID levels of office worker footfall is unlikely to return</p> <p>c. Business closures: 45% of hospitality businesses are unlikely to reopen post-COVID</p> <p>With an uncertain future and the likely long term difficulties facing the hospitality sector related to reduced tourism, lack of office workers in the city and restricted business travel it is highly unlikely that footfall will increase in the west end within the next 12 to 24 months, and may never fully recover due to changes in working patterns, with more office staff and businesses indicating that they may never return to an office environment. Therefore, we believe that the policy is unnecessarily restrictive at a time when it should be supportive of business-led regeneration.</p> <p>Our responses to the questions are as follows:</p> <p>1. Do you agree that the Licensing Authority should implement a Cumulative Impact Policy?</p> <p>No, we are not supportive of Westminster Council implementing a Cumulative Impact Policy for the following reasons:</p> <ul style="list-style-type: none"> • Statements of licensing policy should always allow for the circumstances of each application to be considered properly and for applications that are unlikely to add to the cumulative impact on the licensing objectives to be granted. There should not be an automatic assumption of rejection. • A detailed study by Night Time Economy Solutions Ltd indicated that a CIP was one of the main reasons investors decided not to invest in an area with 100% of 		

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

	Response Percent	Response Total

investors and major high street hospitality chains indicating that if there were a CIP in place they would choose to invest elsewhere. Post-COVID restrictions such as these will not be helpful for regeneration.

- We believe that the cumulative impact of footfall, crime and anti-social behaviour post-COVID will look very different therefore data gathered beforehand will be null and void.
- The cumulative impact policy does not account for the diversity of offer and unnecessarily penalises those from poorer backgrounds, BAME community, disabled people, women, late-night workers by grouping quick-service restaurants with takeaways. These diverse communities need somewhere safe without alcohol to socialise, use the toilets, eat after 9 pm, so to automatically refuse a license to them negatively impacts the ability of those with protected characteristics to utilise the evening and night-time economy.

2. If you have any comments about the implementation of a Cumulative Impact Policy, please provide them below

We believe that the implementation of the policy is flawed for the following reasons

- The defined hours are based on pre-COVID trading, crime, antisocial behaviour and footfall and are not representative of the new world we are living in or the likely post-COVID recovery.
- The assumption of rejection of a license does not account for each license needing to be reviewed under its merit
- "For the purposes of this policy a Fast Food Premises is defined as:"
 - o (1) a premises that provides late night refreshment either by way of fast food on a counter or self seating basis or take away for immediate consumption
 - o (2) provides no or minimal table service
 - o (3) food is either prepared on the premises and cooked in bulk in advance or supplied to the customer in pre sealed disposable packaging for immediate consumption, and
 - o (4) is served in disposable wrapping and may be consumed using the disposable crockery provided.

This doesn't differentiate between takeaways, quick service restaurants and restaurants, all of whom offer these services under current COVID legislation and as standard due to the increase in delivery-based models.

3. Do you have any views on the findings of the 2020 Cumulative Impact Assessment?

- Westminster Council states that you have "reviewed our policy approach in light of the findings from the CIA and the implication of changing our policy in light of COVID". We believe that it is at odds with promoting the licensing objectives in that

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

	Response Percent	Response Total

it is based on historic pre-COVID evidence and there is no balanced post-COVID evidence, or planning for a post-COVID environment. Where The prevention of crime and disorder, Public safety, The prevention of public nuisance are all likely to look significantly different due to reduced footfall and the number of operational businesses.

- In 3.3c it states that "had a high concentration of licensed premises" but it does not directly link those premises with crime or disorder, it's just a statement that they exist. There is a need to directly link crime and disorder with the premises to justify having a CIP.

4. The Licensing Authority aims to include its expectation that licensed premises, as part of their application process, demonstrate how they can promote inclusion in Westminster. Do you agree with the inclusion of this expectation?

We agree in principle that inclusion in the evening and night-time economy is vitally important and should be promoted. The evening and night time economy should be a place where all people irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Therefore, it is important to have a balanced night time offer, which is inclusive of those who do not drink, those who have limited finances, disabled toilets. Quick service restaurants such as XXXXXXXX provide this essential service, and therefore to meet the needs of inclusion should not be unduly punished.

By refusing to consider later opening quick service restaurants Westminster Council is unwittingly being less inclusive for the following reasons.

- We offer high quality night time working opportunities. Our staff tell us that working a full shift that finishes at 6am rather than at 11pm or 2.30am makes a huge difference to them. This is because it is difficult for them to find late night transport to get home if the restaurant closes at earlier, if they cannot get public transport they are forced to stay at work, or choose less safe options to get home, whereas if they finish at 6am local transport is running. This is particularly problematic for female and young workers. The additional operating hours make it easier for them financially because the shifts are longer and therefore their wages are higher. Therefore, for the benefit of our staff we prefer to operate 24-hour operations.

- We are often the only non-alcohol venue open in the night time economy. This means that we are the place of choice for communities such as groups of female Muslims whose choices are underrepresented in the night time economy, and who cannot go to bars or nightclubs. This was highlighted in a Nottingham night time report where a group of BAME women aged 18 to 25 years said "without XXXXXXXXXXXX we would have nowhere to socialise, our parents let us come to XXXXXXXXXXXX because it's supervised, there's no alcohol, we can meet boys from our community in a safe environment, it's well-lit and we can eat and chat for hours,

32. If you wish to make any other comments or provide information associated with the application and determination process under the Licensing Act 2003, please do so below:

	Response Percent	Response Total

our community needs XXXXXXXX to be open late a night, without it we would have literally nowhere to go"

- As public toilets are lost from our high street or are not open after dark, our toilets are often the only public toilets, and in many communities councils pay us to keep our toilets open late, especially if they are working towards national accreditation schemes such as Purple Flag. Our toilets are often the only disabled friendly public toilets on a high street, for example a disabled person interviewed for a recent study commissioned by Lambeth Borough Council that "without XXXXXXXX opening at night I would not be able to use Brixton at night at all, as there are no other disabled toilets in the area, this would make me really isolated, cutting me off from my friends and community, XXXXXXXX toilets at night are a lifeline for disabled people"
- Many people who visit XXXXXXXX do so because accessing more expensive restaurants, culture and arts is outside their economic reach. We provide a cost-effective night out for families and those on low incomes. By removing Fast Food or Quick Service restaurants such as XXXXXXXX from the future high street plans you will make the high street inaccessible to these groups and therefore reduce economic inclusivity. This is particularly important in a post COVID era where many people will be economically challenged.

5. Do you agree with the proposal to include a summary of the 2020 Cumulative Impact Assessment?

As previously detailed, we believe that the summary of the 2020 Cumulative Impact Assessment is deeply flawed because of not including COVID related statistics or plans. We believe that more research and evidence is needed.

6. Do you agree with the proposed changes to the Licensing Objectives policies CD1, PS1 and PN1? This includes their criteria and considerations, listed in clauses B of each policy.

CD1:

- Criteria 1: We do not agree to the proposed changes due to the fact that there is no clear guidance as to what "a significant contribution to levels of crime and disorder" and the "likelihood of crime and disorder occurring as a result of the grant application" are these are open to interpretation at a local officer level.
- Considerations: Including levels of crime and disorder in and around the venue. In the venue is understandable but venues have no control over what happens outside their venue.

PS1:

- Considerations: Q4 states "whether there are procedures proposed to record and

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<p>limits the number of people on the premises with the opportunities for pass outs and readmission". This is only relevant to venues such as pubs, bars and nightclubs and does not account for quick service restaurants. Q8 states "affordable cloakrooms, further measures to combat dances and other overheating" this does not take into account the different styles of premises that are now being included in the CIP such as fast food, quick service restaurants, and is therefore too restrictive.</p> <p>PN1:</p> <ul style="list-style-type: none"> • Point 1: "Limiting the hours of the sales.. or food for consumption outside the premises" does not take into consideration the fast food and quick service restaurants, delivery and takeaways that have been built into the new Statement of Licensing Policy and therefore this undermines the existence of the new categories. <p>10. Do you agree with the proposed changes to the framework of the Protection of Children from Harm Policy (CH1), including its criteria and considerations? Yes we fully support this Policy and the criteria and considerations. Protection of Children and vulnerable adults is something that XXXXXXXX as a family friendly quick service restaurant takes very seriously. We welcome the clear guidance, as it matches our internal training, policies and practises.</p> <p>11. Do you agree with the inclusion of the safeguarding of children as a key policy consideration within the Protection of Children from Harm Licensing Objectives? Yes we fully support this inclusion of the safeguarding of children as a key policy consideration within the Protection of Children from Harm Licensing Objectives this is something that XXXXXXXX as a family friendly quick service restaurant takes very seriously. We welcome the clear guidance, as it matches our internal training, policies and practises.</p> <p>13. Do you agree with the proposed revisions to the framework of the Cumulative Impact Policy (CIP1)? No we do not agree with the policy to automatically refuse applications that have an opening hour before 10:00am and a terminal hour beyond 21:00 within the Cumulative Impact Zone. As detailed in our concerns above. We believe that we will be returning to a very different world post COVID where 50% of hospitality venues will not reopen and therefore the high street will look very different from the one the policy is built around. This policy will restrict growth and regeneration at a time when it is most needed. Pre COVID the night time economy was the only part of the economy in growth, therefore restricting this on reopening will hamper economic regeneration and job creation which will be essential for recovery. We also believe that it is discriminatory toward BAME, disabled, lower socio economic groups by restricting their access to essential services.</p> <p>14. Do you agree with:</p> <p>a. Not expanding the West End CIZ to include Zones 1 and 2</p>		

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<p>b. Retaining the current West End CIZ (except for the North East beyond Covent Garden)</p> <p>c. Excluding the area to the NE of Covent Garden which is within the current boundary of the CIZ, from the proposed new boundary for this zone</p> <p>We do not believe that there is enough evidence to make decision on these expansions and contractions as there is no evidence from the COVID era or future projections, and therefore we do not believe that a reasonable judgement can be reached.</p> <p>15. Regarding the following Cumulative Impact Zones, do you agree with the proposal to remove the</p> <p>a. Queensway / Bayswater CIZ</p> <p>b. Edgware Road CIZ</p> <p>We do not believe that there is enough evidence to make decision on these expansions and contractions as there is no evidence from the COVID era or future projections, and therefore we do not believe that a reasonable judgement can be reached.</p> <p>18. Do you agree with the proposed changes to the Core Hours policy?</p> <p>No, we do not. This is a substantial change to your approach. The current policy distinguishes between premises that offer alcohol and those that don't. We understand from your evidence alcohol is the main driver for the disorder and noise-related complaints. Whereas the new policy includes Fast Food Premises, and although we classify ourselves as a quick-service restaurant we are concerned that this wording is too broad and therefore could be used to include all restaurants in their current trading style due to the impact of COVID legislation and the growth of delivery models.</p> <p>We have substantial evidence to indicate that we reduce noise and disorder in the evening and night-time economy by providing</p> <ul style="list-style-type: none"> • a safe and welcoming, alcohol-free environment where those who do not drink alcohol can come and socialise, this is particularly important to diverse groups such as those who don't drink, late-night workers, women, under 18's, those on low incomes and minority ethnic groups. • free toilets for disabled people • security staff above and beyond requirements • extensive training for our team in managing noise, safety and protecting children and vulnerable adults from harm <p>We are concerned that the council is proposing to limit the trading potential for new businesses at a time when Central Government, the High Streets Task Force and Industry bodies have all indicated that approximately 45%1 of all hospitality businesses will be lost. Therefore we believe that this policy is a stealth policy to cut late-night trading opportunities and prevent healthy 24-hour growth which conflicts</p>		

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<p>with the Greater London Authority Mayor's vision of a 24 Hour London.</p> <p>We do not believe that this policy supports business recovery at a time when Westminster Council should be supporting the businesses that have been hardest hit to maximise their trade and recover from COVID. This policy puts unnecessary strain on regeneration plans. Therefore we do not support the proposal to automatically refuse applications based on the following conditions</p> <p>d. Pubs and bars, Fast Food and Music and Dance venues (within the West End Cumulative Impact Zone): Monday to Sunday: 10:00 to 21:00</p> <p>e. Pubs and bars, Fast Food and Music and Dance venues (outside the West End Cumulative Impact Zone):</p> <ul style="list-style-type: none"> • Monday to Thursday: 10:00 to 23:30 • Friday and Saturday: 10:00 to midnight • Sunday: 12:00 to 22:30 • Sundays immediately before a bank holiday: 12:00 to midnight <p>We also do not support the that it applies to all new and variation application for premises licenses.</p> <p>20. Do you agree with the proposal to introduce new SCZs?</p> <p>We do not support the desire to put forward greater mitigation and controls than those which would normally be expected from premises, therefore creating a higher threshold to grant new applications, without the legal frameworks in place to support this. This appears to be a way of introducing a ClZ without going through the correct legal frameworks. Therefore in our opinion, it puts unnecessary strain on new and existing businesses at a time when Westminster Council should be supporting businesses set up, and grow.</p> <p>21. Do you have any specific comments on SCZs?</p> <p>The text of the SCZ's makes reference to "large number of transport hubs", "noise complaints at night", "illegal waste", "robberies" and "serious violent crime" non of these are attributed to licensed premises. There is only one reference to licensed premises which is "ambulance call outs". Therefore, we believe that alternative measures such as a safe space as used in Nottingham Newcastle and Chester, Street Pastors, Vulnerability Training for venues could be deployed to reduce these to an acceptable level without further restricting businesses.</p> <p>22. Do you agree with the reasoning, boundary and designation of the following SCZs?</p> <ul style="list-style-type: none"> • West End buffer • Queensway / Bayswater • Edgware Road • East Covent Garden • Mayfair 		

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			Response Percent	Response Total
		<p>• Victoria</p> <p>No, we do not support these as they are not attributed to licensed premises, there are other factors involved, and they do not take into account the changing and challenging trading conditions created by COVID.</p> <p>24. Regarding the following establishments, do you agree with the revisions to the policy framework for...</p> <ul style="list-style-type: none"> • Restaurants • Fast Food Premises <p>We do not agree with the revisions to the policy. There is not enough delineation between Fast Food Premises and Restaurants, the wording surrounding Fast Food Premises is too broad and therefore could be used to include all restaurants in their current trading style due to the impact of COVID legislation and the growth of delivery models.</p> <p>29. Do you agree with the Licensing Authority making minor changes to the statement to reflect updates to the law, guidance and council strategies or policies? We agree with the LA making minor changes to reflect updates to the law, guidance and council strategies and policies.</p> <p>30. If you have any comments regarding the updating of the statement, please provide them below: Do you wish to provide further comments or additional information / evidence? We have no further comments.</p>		
4	15/11/2020 12:52 PM ID: 152470624	<p>As stated earlier in our response it is important that when determining applications it is the promotion of the Licensing Objectives which is seen as most important. Whilst complying with CIP1 and HRS1 are important these policies exist in order to promote the Licensing Objectives. Our experience of the determination process over the last 15 years is that there is a tendency of Licensing Lawyers, and Committee Members, to focus on whether or not a premises is of a specific type or open at certain hours, rather than whether or not they will promote the Licensing Objectives.</p>		
5	15/11/2020 13:44 PM ID: 152468159	None		
6	15/11/2020 14:38 PM ID: 152475605	there needs to be a recognition of the effect of COVID and the aftermath which is missing and is pretty fundamental		
7	15/11/2020 16:11 PM ID: 152478097	No		
8	15/11/2020 17:12 PM ID: 152381378			

