

CIVIC RENEWAL

A White Paper for Westminster

A response by

The Westminster Licensees' Association

July 2001

OVERVIEW

The Westminster Licensees' Association (WLA) welcomes the opportunity to comment on the Civic Renewal White Paper. Maintaining Westminster as an attractive centre of economic activity and as a major tourist destination is fundamental to our members' continued business success. WLA members are both key business stakeholders as well as recipients of Council services. We are therefore keen to help develop and deliver a blueprint for the future.

The WLA was established in March 2001 to provide an authoritative and collective voice for bar, club and restaurant owners in Westminster. It is the only trade body dedicated to representing the specific views of Westminster-based businesses in local partnership and forum discussions. The WLA is made up entirely of local business people – predominantly bar, club and restaurant owners based in the West End – and in particular those not well represented by other national trade bodies. The WLA currently represents over a third of all pubs and bars operating within Westminster. Our members include flagship outlets such as Atlantic, Tiger Tiger, the Rainforest Café and the Rock Garden, as well as a number of individual independent small businesses operating under their own fascia.

Each of these outlets plays a vital and vibrant role in making London, and indeed Westminster, the retail and entertainment capital of the UK. They provide modern and professional amenities for foreign and domestic tourists as well as those working and living in the capital. In the case of pubs, they are tourist attractions in their own right – a trip to an English pub is top of many tourists' 'must see' lists – and can provide a valuable community space and facility. Aside from their social and entertainment value, bars, clubs and restaurants are small business units and play an important economic role. The average outlet injects £64,000 each year into the local economy, as well as providing a valuable source of employment for many Westminster residents. Hospitality is one of the fastest growing economic sectors, employing over half a million staff and contributing over 3% of GDP.

If this positive local contribution is to continue, however, the entertainment industry needs a supportive economic and regulatory environment. The Government's Better Regulation Task Force concluded that small businesses in the sector were facing increasing competitive pressures as a result of red tape and bureaucracy imposed at both a national and local level. WLA is concerned that the White Paper as currently drafted falls far short of the supportive local environment required to maintain Westminster's position as London and the UK's pre-eminent entertainment centre.

The WLA is particularly concerned with the language and attitude of the White Paper towards the licensed trade. Much is made of ensuring that there is a balance between the commercial needs and concerns of the entertainment sector and those of local residents, but this is sadly lacking from the whole of the document. The licensed trade is unfairly labelled as the cause and source of anti-social behaviour. No attempt is made to differentiate between responsible operators and those operating illegally or with little consideration for their customers, neighbours and residents. Moreover, no recognition is made of the positive contribution and role the industry plays in the Capital's economic, social and community life.

We would urge the Council to work with local businesses to ensure that this balance is reflected in future policy, and Westminster's position as the retail and entertainment capital of the UK is maintained. The licensed trade has a vital role to play in helping to resolve some of the significant issues facing Westminster today, and should be included in the debate as a valuable partner, not castigated as the principal problem.

WLA has restricted its comments to those aspects of the White Paper of direct relevance to the licensed trade. For ease of reference, comments are grouped under the headings used in the White Paper.

INTRODUCTION

The Introduction to the White Paper acknowledges that Westminster is the retail and entertainment capital of the UK, and the headquarters of many of the world's leading companies. The WLA believes that every effort should be made to ensure that this position is maintained and is disappointed that the White Paper is silent on the policies needed to effect this. We also believe that the needs and concerns of this group of stakeholders must be taken into account in policy development.

The paper focuses particularly on the needs of Westminster residents. It claims that Westminster is one of the fastest growing residential populations of any UK inner city, and argues that action is necessary to ensure that the interests of this group are not adversely affected. WLA accepts that there has been sustained growth in resident numbers, but does not believe that this is unique – Manchester, Newcastle and Birmingham have all experienced similar growth – nor do we believe it demands special treatment.

Westminster is not just a residential enclave. The City plays host on a daily basis to foreign and domestic tourists, businessmen, workers and other visitors. The Council has a duty to ensure that adequate facilities are available to cater for the needs of this diverse group and that the concerns of one interest group do not predominate. We therefore support the White Paper's focus on improving the City's physical infrastructure and facilities, including retail. We recommend that an holistic approach is adopted, and that Westminster work with neighbouring boroughs and the Greater London Authority to develop comprehensive solutions to issues such as transport, environmental pollution and street cleaning.

The licensed retail trade is an important source of visitor and residential facilities. Changing demographics mean that people are increasingly eating out, and seeking informal and inexpensive entertainment on a more regular basis. Increasingly, people demand variety from outlets – they want somewhere where they can drink, eat if they want to and possibly listen to music. The increasing trend towards flexi-time, shift patterns and a more 24 hour society has increased demand for more late night venues, not just clubs but also informal bars and cafes. This demand comes not only from visitors to the City but also from local residents. It is interesting to note that the number of late night licences has increased at roughly the same pace as the residential population.

The Council is concerned, however that the “new night time economy ... threatens the longstanding residential communities”. For many years, the two have co-existed and bars, clubs and restaurants have even formed part of the local community. Responsible retailers are well aware that customers may be neighbours, and vice versa, and take pains to ensure that they foster good relations with those living near them. People choosing to live in the centre of London do so because they want to be part of busy city life, with late night facilities and entertainment on their doorstep. They are well aware that living in Soho or Covent Garden is not the same as living in Pimlico, for example, and that there will be noise and bustle.

The very buoyancy of the private and public sector housing market does not suggest a residential community under threat. We understand that research recently conducted by MORI reveals that over 90% of local residents are satisfied with their quality of life and indeed with living in Westminster. This compares very favourably with neighbouring boroughs. In addition, people are actively choosing to move into areas such as Soho. The number of transactions in Soho in the second quarter of last year showed a 14.3% increase over the previous year. Council transfer requests from properties in Soho are understood to be low. The WLA believes that it is important for the Council to take account of the silent majority of residents, rather than giving undue attention to a small, but highly vocal minority of residents' groups. The West End is not, and has never been, a series of villages. Historically it has always been the centre of entertainment and retail activity.

WLA agrees that it is important to take action to tackle the informal economy which has sprung up within the City. We would urge the Council to direct enforcement activity here in the first instance, before imposing additional controls on legitimate retailers. Unlicensed food stalls, drinking establishments and sex shops do not meet high standards of hygiene and safety and pose a real public nuisance reflecting badly on the legitimate trade. In addition, the number of buskers, beggars, flyposters and minicab touts help to encourage anti-social behaviour contribute to the overall impression of open spaces such as Leicester Square as being dirty and unsocial.

As part of this, the WLA believes that the Council should clarify its policy on external tables and chairs. Many are being used illegally and they are clearly not appropriate in certain locations. This use should be penalised. There are other areas, in Covent Garden Piazza and Soho in particular, where external tables and chairs are a positive feature. Used in appropriate locations, they add to a more relaxed, friendly environment and café society has been demonstrated in other continental cities to have a civilising effect on the late night economy. We would urge the Council to act to clamp down on inappropriate tables and chairs but work with responsible operators in suitable locations to actively encourage the provision of seats.

A dynamic and modern City requires a variety of properties and facilities to cater for the varied needs of its stakeholders. The Council must ensure that policies are developed which encourage and support the existing sustainable mix which makes Westminster so attractive to residents and visitors.

CUSTOMER FIRST

WLA welcomes the recognition of the importance of improving consultation with service users. Westminster is faced with a significantly higher ratio of businesses to residents than is common in most other Boroughs. As such it carries a heavy duty to ensure it takes a responsible attitude towards the establishment of a suitable framework to protect the Capital's economic framework. The White Paper puts forward proposals for a series of Forums to ensure that the views and concerns of interest groups are heard and understood as part of the policy-making process. This is a positive step, and one which we welcome, but efforts must be made to ensure that the fora are truly representative of **local** opinion.

The White Paper is indeed correct in assuming that the majority of local businesses, and in particular local licensed retail premises, feel dis-enfranchised, their needs and concerns overlooked. Licensed retailers in particular would concur with the White Paper's analysis that the Council is perceived as being uninterested in their views and concerns, as pursuing its own agenda regardless of opinion. Urgent steps are required to remedy this, not only to improve consultation with all local stakeholders, but also to improve the attitude of Councillor's and officials to legitimate businesses operating within the City.

WLA reject the suggestion that Westminster is, or has ever been, a collection of villages. Westminster is the dynamic heart of one of the world's premier cities. As such, it is essentially urban in nature and requires joined-up policies to match. Whilst certain districts clearly retain a distinctive flavour, policy planning should be undertaken with the whole in mind. By virtue of geography Westminster cannot draw up policies in isolation, but with a recognition that it is the nation's hub.

Nevertheless, we do recognise that residents and indeed local businesses will have concerns that are specific to certain areas. An Area Forum may therefore provide a useful means of discussing these specific issues and helping to facilitate a common understanding and approach to tackling them. The objective should be constructively to resolve local concerns or difficulties and the debate cannot be allowed to degenerate into NIMBY-ism. It is clearly important that local democratic accountability is extended across the UK. However, parts of Westminster have a markedly disproportionate level of residents. They certainly have valid concerns. However, it falls to WCC to ensure that it does not ignore the needs of businesses simply because they are deprived a democratic voice. It should be ensured that businesses are recognised as stakeholders with local concerns on these forums. The hospitality sector relies on a positive local image to attract business. WLA would note, that some operators will also be local residents, with premises having live-in accommodation for managers and employees.

WLA welcomes the development of sectoral forums as an appropriate medium through which businesses may deliver thoughts on strategy and comment on specific policy. However, our experience with the Entertainment Forum has been discouraging. The body is dominated by national trade bodies, with limited direct interests or knowledge of specific problems concerning Westminster, and some of the representatives are from businesses operating outside the borough. The WLA is the only trade body dedicated to representing *local* licensed retail business interests, and in particular those independent businesses not well represented by other national trade bodies. To date, however, we have been excluded from active participation in the forum. The WLA believes it is important for local groups to be recognised as statutory consultees and involved in the sectoral discussions.

WLA welcomes initiatives to improve customer service, by incentivising quality and establishing a one-stop shop approach to services through the internet. Publishing clear, transparent policies and service standards will also help to improve business planning and ensure a level playing field is enjoyed by all. We would encourage the Council to involve local businesses with expertise in customer service, in the development of programmes.

CITY INVESTMENT

We entirely support the importance of improving the street environment of Westminster. As a sector that relies on Westminster being an attractive and welcoming centre for a considerable proportion of our custom, we support activity to develop the streetscape. In particular, we are keen to see improved levels of street cleanliness and better lighting.

WLA supports the Council's aim to raise the quality of the West End experience, but are concerned at comments that disparage London's drinking establishments in relation to Theatreland. This unfairly equates theatres as being more respectable businesses than the licensed hospitality sector. This seems based more on the prejudices and preferences of those responsible for drawing up the report than any impartial evaluation. It is not within the purview of WCC to determine one business as being more valid than another. Such value judgements are unhelpful and extremely unwelcome and smack of a level of Government cultural intervention in the economy not appropriate to the UK.

Westminster is the entertainment centre of the UK and the various sectors are all interdependent. Theatres rely on a network of late night bars and restaurants to encourage visitors who wish to go for a meal or drink following a show. In the majority of cases, this completes the theatre experience. The location of late night establishment in Theatreland may therefore bring benefits to the theatre. Similarly, bars and restaurants enjoy significant patronage from theatre and cinema goers. Most people travel into Westminster precisely because they are able to enjoy a diverse range of entertainments. Were this not the case they would remain in local centres – to the considerable cost of Westminster's business and local community.

The hospitality sector is a major employer in Westminster and contributes a significant amount to borough coffers in terms of rate payments. WCC is being simplistic in its approach and viewing bars as simply a source of disturbance. They should be viewed instead as a major contributor to the local economy. Bars provide employment to the local population, significantly reduce Council Tax charges through their rates payments, draw people into the area thereby producing a customer base for other establishments which might find it difficult to continue to operate. They complement other attractions such as restaurants, shops, theatre and cinema.

The city centre is in desperate need of improved transport infrastructure. The recently published Mayor's Transport Strategy was a welcome contribution to that debate which we hope will go some way towards introducing to London a public transport system it needs. Increasing the number of buses, the new cross-rail project and opening and extending tube lines are all welcome initiatives.

We would urge the Council to liaise with other Boroughs and the Greater London Authority to improve the number, quality and frequency of late night transport, which is woefully inadequate. Pressure should be put on London Transport to increase the timing of late tubes and the number of night buses. Meeting the needs of the late night economy would provide valuable additional revenue which could be invested in improving the service throughout the day, for the benefit of all those visiting or working in the Capital.

Priority should be given to licensing minicabs and clamping down on illegal operations. Together with support for an increase in the late night fares for black cabs, this will encourage greater taxi provision in the centre. Improved public transport and a greater number of black cabs in the centre would ensure safe dispersal of those coming to the centre for entertainment and help to minimise the element of disturbance and anti-social behaviour which spills over when people are unable to leave.

EDUCATION GUARANTEE

WLA members are obviously keen to be involved in WCC's plans for improved lifelong learning. The rapid expansion of the licensed trade offers a multiplicity of employment opportunities for Westminster residents. We believe that WLA interaction on the Business Brokering Service will be of great interest to our members and of benefit to the community in advancing employment opportunity.

The licensed retail trade provides employment opportunities for over half a million people, and crucially provides the first taste of work for many young people, helping them to develop positive transferable skills. In terms of school leavers, the licensed trade is becoming recognised as a positive career path. In addition to the broad range of vocational courses on offer within the licensed trade, up to and including degree standard, highly respected organisations such as the BII offer further kite marks of excellence to those seeking higher qualification. The increasingly positive career structure in the trade also provides useful transferable experience in the service sector.

People who are returning to the labour market will often find that the flexible hours on offer within the hospitality sector are a major incentive. A long established tradition of flexible hours and shift patterns can make employment within the sector particularly attractive to those whose family commitments otherwise preclude from working and contributing to the local economy.

In line with the strategy set out by WCC, our members offer employment on the doorstep. Those working within our premises rarely commute over any great distance. As such they help to counter a drain on WCC's own social security problems. The expanding hospitality sector has been the single biggest generator of new employment in the past ten years.

The Government's report, "Skills, Local Areas and Unemployment", highlights the importance local schemes and prospects have on the national unemployment situation, specifically mentioning central London as an area where lack of skills prohibits people getting on to the employment ladder. The pub trade is noted for the importance it places on improving the skill levels of the workforce.

CLEAN STREETS

The WLA believes that clean streets are an important demonstration of a well-run and well-managed city. Westminster Council should continue to give high priority to the services they provide in this area.

Operators want premises to be clean, the streets to be regularly washed and litter collected. They also suffer from anti-social behaviour such as public urination and vomiting, and responsible retailers ensure that their premises are well managed to minimise these problems. When this infrastructure fails, it is our members' businesses who suffer and as such they have a vested interest in ensuring that the Council's policy is workable and that they comply with existing Council arrangements. All too often these are inadequate to meet business needs.

WLA would support a continuous 'janitorial' service for the entertainment district of the West End to ensure that the streets are kept clean and that rubbish is regularly collected. Local street cleaners would certainly contribute towards this and help to manage issues before problems arise. The present service arrangements are inadequate to meet the needs of the majority of licensed hospitality businesses, many of whom have limited storage for refuse. In particular, the Borough needs enhanced levels of street cleaning to cope with the litter and dirt caused by visitors and also those unlicensed street traders operating in areas such as Leicester Square.

The majority of our members are either required to or choose to wash down the front of their premises, keep the pavements clean and empty litter bins. Any bar that allows dirt or rubbish to gather outside are unlikely to receive much custom. This is especially true within the West End, where there is so much competition. Our members accept that this is part of running a well-managed operation and being a responsible member of the community, but believe that by making these arrangements they should have some element of control over the front of their premises. Such arrangements should also remain voluntary.

In addition, members make arrangements to put commercial waste out for the Council to collect or make alternative arrangements are made with private contractors. We note the comment in the White Paper that the multitude of private contractors are causing problems. Private contractors are used either because the Council infrastructure is inadequate to meet the needs of the business or because companies are obliged under national Regulations to certify that they have recovered and recycled a proportion of their waste. Private contractors are the most effective means of meeting these obligations. Private contractors are usually more flexible and responsive to the needs of their clients and there is also a greater degree of accountability. The use of private contractors should therefore be a signal to the Council that their own service provision is inadequate to meet the needs of the business community.

WLA would wish to be involved in WCC trials of new bye-laws against dumping. Timing of rubbish collection is important and businesses must be consulted to ensure that appropriate times and frequency of collection are apportioned. Obviously it is important to keep litter off streets, but not in a manner restrictive to business. The problems associated with storing rubbish inside are significant – both in terms of available space and problems of sanitation. Clearly, waste disposal companies that do not collect should be penalised, but the premises who produced the rubbish should not be penalised if it is not their fault that a collection has not been made.

Public urination and the provision of public toilets is an issue which has been under discussion for some considerable time. WLA members suffer together with local residents and other businesses from people urinating in doorways due to the fact that there are insufficient public toilets in Westminster to meet the needs of visitors, businesses and residents, and the WLA does not believe it is the role of the licensed trade to meet that

shortfall. Toilets are provided for customers and, in order to maintain a degree of control over the cleanliness and quality of the facilities provided, operators reserve the right to restrict access. WLA welcome the recently adopted programme of introducing mobile public urinals, and the Council's acceptance of its role as service provider in this instance.

WLA welcomes the Council's crackdown on fly-posting, which can induce a certain shabby-ness in an area. All forms of illegal advertising, including the distribution of flyers where not authorised, should be prosecuted. We would urge the Council to take an even stronger line against all illegal activities and operators and prioritise action in this area over efforts to further restrict the commercial freedom of legitimate operators..

We would sum up by reminding WCC that bar owners are residents too. Not only do they have the aesthetic interest of the resident in improved street sanitation, the necessary improvements will also have a direct effect on their ability to attract customers and hence profitability.

CITY GUARDIAN

The WLA believes that there should be far greater crack-down on illegal and anti-social behaviour and is fully supportive of measures designed to tackle the individuals causing these specific problems. As has already been noted, we believe that measures in this area should be given priority over and above those designed to impose additional controls on legitimate businesses. Civic renewal is meaningless unless the rotten apples and the illegal traders are removed.

We are interested in the concept of the Civic Guardian Force but are uncertain about exactly how this would function. We would be interested to know what powers would this group would have, and how would it stand legally? We would welcome any body that would free up the police to carry out their more traditional responsibilities of tackling areas of concern such as street crime.

WLA supports the Council's proposals for establishing Council/Police teams to fill specific gaps in existing enforcement activity. We would urge the inclusion of local businesses in those to develop a partnership approach to tackling crime, eliminating illegal activities and driving up standards in the legitimate trade. This would extend the work of existing Crime and Disorder Partnerships. As a priority, efforts should be directed towards prosecuting and removing illegal street traders. All too often these traders can help to drive down the character of a neighbourhood, create litter and nuisance and pose a risk to public health and safety.

We are concerned that the focus of the Council's activity does not appear to be directed towards illegal or anti-social behaviour, but rather at imposing additional controls on legitimate businesses. The majority of businesses are well managed and well run and their operations take account of legislative requirements, as well as the need to be responsible neighbours. We would urge the Council to reassess their attitude to the licensed hospitality trade, accept that these businesses can play a positive social cultural and economic role and, in the main provide quality services. The Council should seek to provide a supportive environment to quality, well managed operations and focus its attention instead on those acting illegally.

We would also urge the Council to abandon the use of blanket policies in respect of the licensed retail trade. This approach is disproportionate to the problem – which tends to arise from a small number of badly managed outlets – and unduly penalises legitimate operators. The Council must develop policies which are flexible enough to take account of the specific quality and individual nature of the outlet rather than simply basing their assessment on numbers.

WLA notes that evidence suggests that the scale of the problem facing Westminster and all of its stakeholders is less significant than it may appear on the surface. Total arrests for drunk and disorderly behaviour within the Metropolitan area fell by over 77% over the past decade. This is by far the largest fall in the country and yet is concurrent with a period in which London's late night economy boomed. Similarly, whilst the figures for public disturbances and noise nuisance remain unacceptably high, it is unfair to pin the entire blame for this on the licensed retail trade. In 1999 there were less than 2 disturbances a day inside licensed premises. This means that the averaged licensed premises in Westminster has only 0.4 disturbances each year.

A major complaint against bars is the level of noise and disturbance generated on their premises, or by their customers on leaving. However, Westminster Council's own figures show that 70% of all noise complaints are generated by residential sources, with a further 15% originating from building sites and 5% coming from assorted sources including street busking, car alarms and air conditioning units. This leaves less than 10% of all noise

complaints attributable other sources, including licensed premises, be they pubs, clubs, bars and restaurants, and their customers. Whilst we are not complacent about tackling noise pollution we feel WCC unfairly focuses on the pub trade as an easy target, rather than direct any significant criticism towards local residents.

WLA strongly objects to the Council's stated policy of strictly limiting the number and opening hours of licensed premises within certain parts of the Borough. This is an oversimplistic response to the problems of anti-social behaviour. The number of outlets and the fact that they are licensed does not cause such problems, individuals do and the management of both facilities and of the wider city infrastructure can help to minimise that or can equally exacerbate it.

Well managed operations ensure that customers do not drink to excess and cause a disturbance either in the bar area or when leaving. The Criminal Justice and Police Act 2001 provides an additional incentive to maintain order both inside and outside the premises by giving police the power to close disorderly premises or outlets where disorder takes place outside and in the immediate vicinity of the premises. The WLA believes that these new powers are sufficient to address Westminster's concerns and that additional controls are unnecessary.

Similarly, more flexible trading hours has been proved to be crucial to minimising public disorder flashpoints. Research from both the Home Office and Portman Group indicates that a flexible approach has a positive impact on public order by encouraging more gradual dispersal over a longer period of time, reducing pre-closing bingeing and simultaneous turn out onto the streets of large number of people. It also has the benefit of evening out demand for refreshment and transport facilities and hence reduces the number of disorder flashpoints away from licensed premises. Westminster's policy of standard closing hours and restricting bar development to a small number of streets and areas within the borough flies in the face of this and may actually contribute towards greater public disorder.

That is not to say that licensees are complacent about the problem. We accept that alcohol related crime and disorder is a significant issue which must be addressed. Our members suffer considerable commercial detriment through violence and vandalism and are keen to support measures that would see a marked reduction in this. This document unfortunately sees licensees as part of the law and order problem, not partners that may provide the solution. WLA would be keen to work with the Council to develop innovative policies to encourage greater individual responsibility, tackle unacceptable individual behaviour and raise standards across the industry. We simply believe that the answer to the problem is not a more punitive approach across the whole industry.

For example, a recent scheme in Leicester city centre run by the trade and local police, saw customers leaving late night establishment, as well as pubs, being given a lollipop. This both gave them something to do on leaving, put them in a better mood and also meant that they were less able to make a noise and hurl abuse at each as they left. In the eight weeks leading up to the introduction of the scheme there were 31 assaults on Saturday nights. In the eight weeks of the scheme, this fell to 9 assaults – a 71% reduction. Such simple approaches are often better than legislation and do not damage legitimate businesses.

With this in mind WLA gives vocal support to the suggestion of introducing Responsible Management Charters. We believe that the promotion of best practice and a supportive environment which encourages well managed operations is the most effective means of ensuring that public disorder is minimised. The tone of the White Paper is disappointing however insofar as it tars all late night operators with the same brush and fails to recognise that well managed operations can and do exist. We would urge the Council to approach the

development of these Charters in a spirit of genuine partnership and with a resolve to help support and encourage well managed outlets.

Our main reservation is that, judging by the tone of parts of this paper, the Council has a severe lack in understanding of what bar owners are able to achieve and the influence they are able to have over their customers. We hope to fill that knowledge gap. WLA believes that it can provide WCC with valuable information leading to a positive working document that would incentivise best practice through valid discussion groups. We would take this opportunity to once again remind WCC that WLA is the ONLY organisation that specifically represents licensees WITHIN Westminster. As such we have a superior understanding than national bodies of the specific problems and opportunities facing licensees within the borough. WLA's local focus enables us to rapidly disseminate best practice through to members. As all our members operate under similar conditions, we are able to adopt a common position with a freedom not granted to national organisations with member concerns nationwide and in urban, suburban and rural settings with the varying priorities associated with their own specific area.

WLA would like to see the development of a clear and workable policy on al fresco dining and the provision of tables and chairs outside outlets. There is much research to show that a move towards a European style café culture will be instrumental in helping to minimise the public order concerns about licensing. It fosters a more friendly, relaxed approach and is less likely to lead to flashpoints. WLA is therefore concerned by news that WCC intends to limit the number of seats available outside in the Covent Garden Piazza. The Piazza is one of the best examples of this approach and is popular with both tourists and residents, especially over the summer.

WLA categorically rejects the implication that bar owners are somehow complicit in drug use within the Capital. The case can be simply put - there is absolutely no commercial advantage in doing so. Bar owners do not welcome the increased public order difficulties that come with drug use. Users are likely to be uncooperative, rowdy and will be unlikely to purchase alcohol whilst they are using drugs.

WLA believes that the City Guardian programme should find ways of incentivising good and responsible behaviour as well as penalising bad or imposing blanket controls on all businesses. Failure to ensure this type of balanced approach will lead to a stagnation in the entertainment and hospitality industry. The only businesses able to afford to operate in Westminster will be major multiples and down market businesses which are not well run. The independent businesses and dynamic, innovative operators will be forced out, to the detriment of Westminster and London as a whole.

CONCLUSION

WLA members are a vital part of the social, cultural and economic framework of Westminster and a key stakeholder in the debate on the civic renewal of the borough. As such we are keen to work with the Council to develop dynamic and workable strategies for the management of the city environment and the promotion of responsible retailing.

We are concerned that the White Paper is far too concerned with looking at how it would like Westminster to be, rather than focus on the practical problems faced by the community. We are also concerned at the negative approach adopted to the whole of the licensed trade. We recognise that the expansion of the late night economy will result in some changes, but believe that, through co-operation and consultation, these changes can be effectively managed. This consultation cannot be taken forward under the assumption that all bars necessarily contribute to any social decay in and around Westminster.