

5th January 2004

West End Team
Westminster City Hall
Freepost LON16752
London SW1E 6YY

Dear Sir/Madam

Covent Garden Draft Action Plan

The Westminster Licensees Association (WLA) welcomes the opportunity to submit comments as part of the public consultation exercise on the Draft Covent Garden Action Plan. The WLA is the trade body representing the interests of pub, bar, restaurant and club operators within the Borough and a significant number of our members' outlets are located in and around Covent Garden.

Our members are therefore key stakeholders in the area and have an active interest in measures to improve and promote it. We applaud the Council's approach in developing an area-specific action plan, drawing together all the various interest groups. We also warmly welcome the inclusive approach towards the development of policy in this area, and in particular the involvement of key partners in pre-consultation discussions. We note that a number of our individual members have already been engaged in these discussions and will be involved in future working groups to take forward any proposals. The WLA explicitly supports and endorses their representations, in particular those made by The Rock Garden, Covent Garden Restaurateurs Association and the Covent Garden Business Forum.

We do, however, have a number of specific comments to make in respect of the draft action plan and these are set out in the attached document. We should be happy to provide any additional information if appropriate.

Yours faithfully

Kate Nicholls
Secretary, WLA

DRAFT COVENT GARDEN ACTION PLAN
Representations by Westminster Licensees Association

Westminster Licensees Association (WLA) was established in March 2001 to provide an authoritative and collective voice for licensed businesses in Westminster. It is the only trade body dedicated to representing the specific views of Westminster-based businesses in local partnership and forum discussions. It sits on the Westminster Entertainment Forum, has regular quarterly meetings with Council officers and is represented in discussions with local magistrates, the police and other key stakeholders. We also work closely with other trade and business bodies, both national and local.

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 licensed premises within the Borough. Our members include national chains such as Mitchells & Butler, S&N Retail, established London operators such as Urbium and Regent Inns and a number of individual independent small businesses operating under their own fascia. A large number of these will be located in and around Covent Garden.

Each of these outlets plays a vital and vibrant role in making Westminster, the retail and entertainment capital of the UK. They provide modern and professional amenities for foreign and domestic tourists, as well as those living and working 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.

OVERVIEW

The Westminster Licensees’ Association (WLA) welcomes the opportunity to comment on the Draft Covent Garden Action Plan. Maintaining such an important and historic area 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.

We applaud the Council in bringing forward this type of initiative. We are in general agreement with the analysis of the current problems and challenges facing the area and the proposed actions to be taken to address them. We wholeheartedly endorse the focus on improving the transport infrastructure and more enhanced and effective enforcement.

In particular, we warmly welcome the positive general comments about the licensed trade and the recognition of the contribution it makes to the vitality and vibrancy of the area. The bars and restaurants of Covent Garden provide facilities for theatre-goers, shoppers and those living and working in the area. The health of all is interdependent and a balance of interests is vital. It is also noted that the imposition of further standard conditions or restrictions on the licensed trade would not be effective in delivering the Action Plan.

We do, however, have a number of general concerns about the document. The Action Plan sets out a range of short, medium and long-term steps to be taken to address specific problems. The Council has consistently noted that it does not have the resources to implement all of these and will be looking for “significant input” from third parties. Whilst we accept

that additional external funding will be required in some specific areas, there are limits to the amount of funding which may be provided by individual local businesses. Many of our members already contribute to CCTV, are under an obligation to keep their frontage clean and pay for refuse collection and streetscene improvements. Any such contributions should be for additional and specific services and we would continue to expect the Council to provide the required public services.

Our second general concern is the special status awarded to the Covent Garden Area Trust in the Plan. Covent Garden is characterised by the diversity of interests, the businesses and people who use the area, and its success is derived from the balance of these often competing interest groups. That balance would be threatened if the views of the Covent Garden Area Trust were allowed to dominate and their Conservation Management Guide was adopted as a blueprint for the area. The reference to the possible need for Supplementary Planning Guidance to take account of this latter document is particularly worrying, and we would be concerned if something which was intended to be a reference document or a guide was incorporated into formal planning policy.

The WLA has a number of additional specific comments on various aspects of the Draft Action Plan. For ease of reference, these are grouped in the order in which they arise in the document itself.

OUR VISION –WHAT IS COVENT GARDEN?

The introduction to the document describes Covent Garden as an historical treasure, a residential neighbourhood, a unique shopping experience and a home for British theatre. It is, of course, all of these things, but it is also home to a variety of licensed premises which help to give it its unique character and also provide vital facilities to visitors coming to the area for one of those purposes. We are disappointed that there is no reference to the trade in this opening section.

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 which people can visit after the theatre, for example. This demand comes not only from visitors to the City but also from local residents.

We support the definition of boundaries set out in the Draft Action Plan and also the sub-division of the area into four.

TRANSPORT

We agree with the Council's analysis of the transport problems facing the area, in particular the limited capacity of Covent Garden tube station. We would be happy to support and endorse the Council's lobbying activities with London Underground in this area and believe that a broad coalition of interests should be brought to bear.

We are somewhat surprised at the absence of any reference to the need for improved late night transport links in the area – particularly in light of other comments within the document about the need to ensure quick and easy dispersal of customers of late night premises. We would welcome support for our efforts to secure limited later tube services on Thursday-Sunday evenings and believe that this would play a part in delivering some of the objectives of the Action Plan.

There is also a shortage of readily available taxis at night and Covent Garden is particularly poorly served by taxi ranks. We therefore support and endorse the suggestion that a marshalled taxi rank be organised and promoted.

STREET ENVIRONMENT

Clutter

This section of the Draft Action Plan begins by stressing the need to remove 'clutter' from the area. Whilst we applaud the sentiment, we are concerned at the way in which it may be interpreted. Clutter is a subjective term and may be used by one interest group to refer to something which they dislike but which is perfectly legitimate and vital to the interests of other stakeholders. We are particularly concerned by the reference to reviewing and rationalising all existing street furniture and signage, suggesting that current legal tables and chairs or A boards may be removed.

We would prefer a more objective approach to be adopted and references to the removal or rationalisation of certain aspects to clearly relate to illegal or unlicensed activity. It is also important for there to be an acceptance of the genuine needs of businesses in this context.

Tables and Chairs

Whilst the Action Plan acknowledges the popularity of alfresco dining and its contribution to Covent Garden's vitality and character, it goes on to state that many streets are too narrow to accommodate tables and chairs and that they attract street crime.

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. Well managed al fresco dining – particularly full service restaurants serving high quality food – fosters a more friendly, relaxed ambience and can help to discourage anti-social behaviour. Covent Garden Piazza is one of the best examples of this approach and is popular with both tourists and residents, especially over the summer. Appropriate tables and chairs will add to, rather than detract from the attractiveness of the 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. This should be criteria rather than location-based, with each case being assessed on its merits and should be premised on the basis of encouraging al fresco dining where appropriate.

We would draw the Council's attention to the report produced by the Covent Garden Restaurateur's Association in this subject in September 2001 and the reports from the Leicester Square Association which demonstrate the beneficial effect al fresco dining may have on street crime.

Public Toilets

We are concerned by the reference in the Action Plan to efforts being made to ensure that proposals for any new development in Covent Garden to contribute to the provision of new facilities and commit to the on-going costs. It is not clear whether this refers to planning conditions, formal planning gain or informal agreement. We would be concerned if it was anything other than a voluntary agreement.

Street Litter and Waste Collection

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. 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. 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.

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. It is also worth noting in this context that restaurants and late night premises are often wrongly blamed for black bags being left on the streets.

ENFORCEMENT

The WLA fully supports the Council's objective of giving an even higher priority to the enforcement. It is worth noting in this context that more effective enforcement of existing laws would go a long way towards delivering much of the action plan – something the WLA has been calling for since its inception. 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 support the proposals to clamp down on illegal street trading and to bring busking under control. It will be particularly important to fill specific gaps in existing enforcement activity between the Council and Police. 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.

Noise nuisance is often referred to as a potential problem and the noise from regulated licensed premises is negligible in comparison to that from unlicensed and unmonitored street traders and street performers. 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 support the principle of a busking control zone.

The Council is proposing to extend the current street drinking control area to Covent Garden. We note that this is explicitly directed at confiscating alcohol bought from off-licensed premises and controlling itinerate street drinkers. However, we believe that it would be helpful if the Council publicly stated that traditional drinking in appropriate areas outside licensed premises was not under threat.

CONCLUSION

We endorse the ethos and guiding principle behind the Draft Action Plan, in particular the involvement of business and other stakeholders at the earliest possible stage of policy development. We look forward to seeing this approach adopted more generally.

We strongly support a number of the key proposals surrounding transport and enforcement, and would welcome the opportunity to continue to work with the Council to deliver those.