

## Submission to the Reforms to the MHCLG Statutory Consultee System Consultation

### Introduction

Heart of London Business Alliance (HOLBA) represents over 500 businesses across Piccadilly, Leicester Square, Haymarket, Jermyn Street and St Martin's Lane, (the 'Heart of London area') - the commercial and cultural core of London's West End. This area is one of the UK's most globally competitive economic districts, playing a central role in London's experience economy, creative industries, night-time economy, hospitality, retail and cultural life.

The West End generates over £55 billion in annual GVA<sup>1</sup>, supports around 500,000 jobs<sup>2</sup>, and attracts 280 million visitors each year<sup>3</sup>. It is home to around 58,000 businesses<sup>4</sup>, 50 theatres, and hundreds of restaurants, galleries, hotels and creative venues. Within this, the Heart of London area alone delivers almost a third of total West End GVA from just 12% of its land area, demonstrating exceptional productivity.<sup>5</sup>

HOLBA welcomes the Government's review of the statutory consultee system and its focus on improving performance, efficiency and clarity within the planning process. We support the objective of ensuring that statutory consultation is streamlined, focused on matters that genuinely require technical expertise, and operates in a way that supports growth, investment and timely decision-making.

The Government's ambition to improve the performance of the statutory consultee system is particularly important in major growth centres such as the West End, where planning decisions shape London's international competitiveness and its ability to attract global investment, talent and cultural activity. The London Growth Plan rightly recognises the visitor, cultural and experience economy as a priority growth sector for the capital, with central districts such as the West End playing a leading role in delivery.

### **Question 1: Are there other key areas we should be considering in relation to improving the performance of statutory consultees?**

HOLBA considers that improving the performance of statutory consultees requires greater focus on clarity, proportionality and scoping. Clearer guidance on the extent of statutory consultation that is required, combined with greater use of standing advice, would help reduce unnecessary referrals and allow statutory consultees to focus their resources on the applications where their expertise adds most value.

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<sup>1</sup> Hatch, 2025: HOLBA 24-hr Economy Evidence Base

<sup>2</sup> ibid

<sup>3</sup> Huq, with calculations by HOLBA, Core West End geography, FY24-25

<sup>4</sup> Hatch, 2025: HOLBA 24-hr Economy Evidence Base

<sup>5</sup> Annual Economic Real Estate Report 2024 – 2025, Heart of London Business Alliance

In complex urban environments such as the West End, performance would also be improved by clearer articulation of the specific issues on which advice is sought. Better scoping at the point of referral would reduce delays, improve the relevance of responses and support more efficient decision-making by local planning authorities.

**Question 2: In exploring reforms to the system, we have so far focused more on key national statutory consultees. Is there more that the government should do in relation to smaller scale and local statutory consultees?**

HOLBA considers that any approach to smaller-scale and local statutory consultees should be guided by the same principles of proportionality, clarity and performance that apply to national bodies.

There would be value in ensuring that the role, scope and expectations of local statutory consultees are clearly defined, with a strong focus on avoiding duplication with national consultees or other regulatory regimes. Where issues can be addressed effectively through policy, guidance or standing advice, statutory consultation may not always be necessary.

HOLBA also supports a consistent approach to performance management across all statutory consultees, regardless of scale. Clear expectations around response times, relevance and proportionality of advice would support local planning authorities in managing applications efficiently and weighing statutory input alongside other material considerations.

In complex and nationally significant locations such as the West End, it is also important that statutory consultation is clearly focused on areas of genuine technical specialisation. This approach allows consultees to focus on applications where their input has material significance and helps local planning authorities manage workloads more efficiently, without diminishing oversight.

**Question 28: Is there anything else the government should be doing to support local planning authorities in their engagement with statutory consultees?**

In addition to reforms to the statutory consultee system itself, HOLBA considers that the Government should continue to support local planning authorities by improving the clarity, consistency and efficiency of the consultation process.

Clearer guidance on when statutory consultation is required, greater use of standing advice and improved scoping of consultation requests would help local planning authorities engage more effectively with statutory consultees. This would reduce unnecessary administrative burdens, allow consultees to focus on applications where their input has material significance, and support more efficient management of workloads without diminishing oversight.

HOLBA also supports measures that improve transparency and predictability in statutory consultation, including clearer expectations around response times and the form and relevance of advice provided. This would assist local planning authorities in coordinating engagement, progressing applications in a timely way and weighing statutory advice alongside other material considerations.

**Question 31: How best can government and statutory consultees support the increase in capacity and expertise of local and strategic authorities?**

HOLBA considers that increasing the capacity and expertise of local and strategic authorities, particularly in complex and nationally significant locations such as the West End, requires stronger integration of specialist, place-based knowledge alongside statutory technical advice.

Business Improvement Districts and place-based organisations such as HOLBA have a detailed, operational understanding of how dense city centre environments function in practice. In the Heart of London area, this includes insight into footfall and dwell time patterns, visitor behaviour, cultural activity, servicing and logistics, public realm pressures, safety considerations, and the interaction between uses across the day and night-time economy.

Through its placemaking strategies, HOLBA has developed a suite of initiatives aimed at strengthening the West End's long-term performance and global competitiveness. This includes its Arts Quarter work, which seeks to support and cluster cultural and creative activity, enhance cultural visibility and animation in the public realm, and ensure that development proposals contribute positively to the West End's role as a leading cultural destination. HOLBA's West End International Centre work further articulates the need for an interconnected, high-performing central London destination, underpinned by high-quality public realm, a diverse mix of uses, strong cultural infrastructure and a consistently excellent visitor experience.

Together, these initiatives are supported by data, evidence and on-the-ground delivery experience, and provide a practical framework for understanding how individual development proposals contribute to wider economic, cultural and placemaking objectives. At present, however, HOLBA does not have a consistent opportunity to engage at an early stage in the planning process to help shape proposals or provide this input in a structured way.

As part of this reform, HOLBA suggests that the Government should encourage and help standardise a more consistent model of engagement between local planning authorities and specialist, place-based organisations in nationally significant centres, alongside statutory consultation. In locations such as the West End, recognising organisations like HOLBA as a formal consultee on major planning applications would enable officers to draw on this specialist insight in a structured and efficient way.

As a consensus-based organisation representing over 500 businesses, landowners and cultural institutions, HOLBA is well placed to coordinate business insight and provide balanced, place-based input on major proposals. This can support officers in understanding how schemes optimise wider placemaking outcomes, contribute to cultural vitality, support footfall and visitor experience, and identify proportionate mitigation or enhancements that add value to the area as a whole. HOLBA also considers that place-based organisations can play a valuable role in supporting local authorities in the effective use of planning obligations. In Westminster, significant Section 106 and Community Infrastructure Levy funds are collected for allocation. HOLBA's detailed understanding of local needs, priorities and delivery opportunities would enable it to support officers in identifying appropriate projects and investment priorities that align with adopted strategies and deliver tangible placemaking benefits, early on.

This form of engagement would not replace the role of other statutory consultees. Rather, it would complement statutory technical advice by strengthening local capacity and helping authorities to better interpret how development proposals support wider economic, cultural and placemaking objectives in globally significant centres. In complex areas such as the West End, this collaborative approach would improve the efficiency, confidence and quality of planning decision-making. HOLBA stands ready to work with Westminster City Council and the Government to help shape and pilot this type of structured, place-based engagement as part of a more capable, efficient and high-performing planning system.