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Submission to Government Consultation on the Introduction of a Mayoral Power to Create Overnight Visitor Levies

9 February 2026

Executive summary

This submission is made by Harrow Monitoring Group in response to the Government's consultation on the proposed power for Mayoral Strategic Authorities to introduce overnight visitor levies in England. We welcome the opportunity to contribute to the development of this policy.

We support Brent Council's call for any overnight Visitor Levy to be grounded in fiscal fairness and meaningful local retention. Developments in Brent have direct consequences for Harrow. The concentration of major events at Wembley Stadium and the OVO Arena generates operational and environmental pressures that extend beyond borough boundaries.

In this submission, we draw on what is experienced in Brent and Harrow as illustrative evidence of how visitor impacts operate in practice. The Government's consultation is therefore significant for both areas. Any fiscal mechanism intended to address visitor-related effects must reflect cross-border dynamics and functional economic geography, rather than relying solely on administrative lines.

Elaboration

1. Brent Council has publicly argued that areas hosting significant visitor attractions should retain at least 50 per cent of levy revenues, that funding should follow visitor numbers, and that a percentage-based model would ensure long-term fairness. This position provides relevant contemporary evidence of the scale and concentration of visitor-related pressures. However, it also illustrates a core design risk within the consultation framework: a levy based primarily on accommodation location may fail to reflect where operational and environmental impacts are actually experienced.
2. Harrow experiences secondary but material consequences arising from events in Wembley. These include traffic displacement into residential areas, increased strain on shared transport corridors, additional waste and environmental pressures linked to visitor movement, and public safety coordination across borough boundaries. Accommodation usage is similarly distributed. Visitors attending events frequently stay

in neighbouring boroughs, including Harrow, meaning that levy incidence and service impact do not necessarily coincide geographically.

3. Major Wembley events regularly generate concentrated nuisance in areas such as Stanmore town centre and around Stanmore Underground station within Harrow. On event days, significant pedestrian movement extends well beyond Brent's boundary, resulting in noise disturbance, obstruction of residential access, littering, and instances of misuse of private property including driveways and front gardens. Residents report loss of amenity, reduced mobility, and heightened anxiety linked to crowd behaviour and late-night dispersal. These impacts are episodic but predictable, and they are directly correlated with Wembley event scheduling.
4. In considering whether Foundation Strategic Authorities should also have the power to introduce levies, we caution against the creation of a fragmented fiscal landscape. Uneven powers across adjoining areas risk distorting accommodation markets, encouraging regulatory arbitrage and generating administrative complexity for providers operating across boundaries. The Government should prioritise coherence and consistency in any devolution of fiscal authority.
5. Revenue use must be tightly aligned to demonstrable visitor-related externalities. These include street cleansing, waste management, traffic and transport management, community safety, enforcement, environmental maintenance and public realm resilience. The legitimacy of the levy depends on a transparent causal link between revenue generation and expenditure. Broad or undefined spending powers would weaken accountability and public acceptance.
6. Allocation mechanisms should incorporate visitor-flow data and measurable service pressures rather than relying exclusively on accommodation location. Where cross-boundary impacts are evidenced, statutory provision for inter-authority revenue sharing or pooled funding arrangements should be embedded in the framework. Without such mechanisms, neighbouring authorities such as Harrow risk absorbing costs without access to offsetting revenue.
7. A percentage-based levy structure is preferable to a flat-rate charge. Proportionality ensures horizontal equity across accommodation types and price bands, adjusts with inflationary pressures, and avoids disproportionate impact on lower-cost provision. However, Strategic Authorities' powers to vary rates must be constrained by mandatory consultation, publication of impact assessments, and periodic review requirements to ensure fiscal discipline and transparency.
8. Administrative arrangements must minimise regulatory burden. Liability should rest with accommodation providers, with collection integrated into existing booking and accounting systems. Standardised digital reporting, harmonised definitions of chargeable accommodation, and consistent compliance frameworks across Strategic

Authorities will be critical to avoiding duplication and inefficiency. Small and medium-sized enterprises must not face disproportionate compliance costs.

9. Equalities impacts require systematic assessment. Overnight stays are not confined to discretionary tourism; they include business travel, visiting friends and relatives, medical treatment, education-related stays and attendance at cultural or religious events. Levy design must consider the distributive impact across income groups and protected characteristics, ensuring that lower-income visitors are not disproportionately affected.
10. We emphasise that an overnight visitor levy should not substitute for adequate core local government funding. It is a targeted instrument intended to address identifiable visitor-related costs. Its introduction must therefore be evidence-based, proportionate and transparent, rather than compensatory for structural funding shortfalls.
11. Harrow Monitoring Group makes the following consolidated recommendations:
 - i. The Government should require that levy revenues demonstrably follow visitor impact, incorporating cross-boundary revenue-sharing mechanisms where functional geographies overlap.
 - ii. The statutory framework should mandate hypothecation of funds to clearly defined visitor-related expenditure categories.
 - iii. Levy rates should be percentage-based and subject to mandatory public consultation, impact assessment and periodic review.
 - iv. Administrative systems should be nationally standardised to minimise compliance costs and prevent fragmentation.
 - v. Equalities impact assessments should be compulsory prior to implementation and at regular intervals thereafter, particularly in areas rich in sociocultural and religious diversity.
 - vi. The enabling legislation should include transparency obligations requiring annual publication of revenue collected, allocation methodologies and expenditure outcomes.

Conclusion

The experience of Brent illustrates both the rationale for and the structural risks inherent in the proposed power. Major event destinations generate national economic value but concentrated local pressures, often extending into neighbouring boroughs. The effectiveness and fairness of an overnight visitor levy will depend on whether its design reflects real-world visitor flows, embeds fiscal accountability, and safeguards equity across communities.

References

1. Ministry of Housing, Communities and Local Government, *Overnight Visitor Levy Consultation: Mayoral power to create visitor levies on overnight stays in England* (consultation document).
2. Brent Council public statement on proposed overnight Visitor Levy and local revenue retention linked to Wembley event impacts.
3. Office for National Statistics, tourism and visitor economy datasets (latest available releases).
4. Local Government Association, analysis on local government funding pressures and visitor economy impacts.
5. Relevant international models of municipal or regional tourist/visitor taxes (e.g. European city tourism levy frameworks) for comparative administrative practice.