

Responses to the consultation on proposed Town Centre Street Trading Policy 2018-2021

56 responses were received via an online survey, broken down as follows:

Residents	27
Local business	2
Local community group or organisation	2
Council partner / stakeholder	1
Unspecified	24

The summary of responses and comments of note is as follows:

Question 1: Do you think the current Town Centre Street Trading Policy is still appropriate for Watford?

Answered: 54 Skipped: 2

Yes	24	44.44%
No	14	25.93%
Not sure	16	29.63%

Q2 Thinking about your answer to the previous question about the current policy, please give reasons for your answer.

Answered: 28 Skipped: 28

Key responses:

- 2.1 *The Big Events are popular and well attended, and so it is important to focus activity on these, rather than increasing competition at other, quieter times of the year. The market and retailers in the town are struggling enough without adding additional competition when there is no additional footfall* **[Town and County Markets]**
- 2.2 *Currently our Ice Cream vans all hold a 5 star rating so being required to have a 4 star rating is not a problem us, however, are the food street traders being held to the same standards as those food outlets that are more permanent (market stalls, food court and local takeaways and restaurants that are on the parade. In the event that consent is given it should be for the entirety of the event, not on a day by day basis.* **[Local Business]**
- 2.3 *Focused on local authority led events with little flexibility for other large events. Too restrictive. No provision for the potential of commercial operators coming into the town - income generation (e.g. Sky, Virgin, EE etc.). Stevenage BC manage to draw in additional annual income by opening up to commercial operators - I am sure a balance could be achieved and managed. Any additional income could be reinvested back into events or developing the cultural strategy.* **[Business Improvement District]**
- 2.4 *I think there needs to be a much smaller limit on street trading in Watford.* **[Resident]**
- 2.5 *We need to protect our shops first before having outside traders unless a completely different trade to what is nearby* **[Watford Community Action Group]**

- 2.6 *Limiting to 6 seems too few* **[Anon.]**
- 2.7 *Trading has changed and is changing every year. The policy needs to reflect the needs of consumers and the users of the high street, as well as providing appropriate employment for traders.* **[Resident]**
- 2.8 *I like the wide variety of traders/shops coupled with community activities.* **[Resident]**
- 2.9 *Most of the policy is excellent my only query is why limit it to 6 vendors?* **[Resident]**
- 2.10 *Yes, as long as stalls are carefully vetted and not providing a danger/overcrowding.* **[Resident]**
- 2.11 *Higher standards need to be implemented. More high quality craft goods and less lower quality goods. More Local farmers selling fresh produce directly.* **[Resident]**
- 2.12 *With the large number of eating establishments already in the parade area and even more lower down the high street the last thing required is more food.* **[Resident]**
- 2.13 *YES It has brought a lot more into the town especially at Christmas time with the ice rink etc.* **[Resident]**

Officer comments: a range of views but taken with the breakdown of yes and no responses in question 1 and subject to comments made elsewhere in the consultation, the policy seems to be appropriate for Watford.

Q3 Do you think the current Town Centre Trading Policy is working successfully for the Big Events programme?

Answered: 46 Skipped 10

Yes	21	45.65%
No	9	19.57%
Not Sure	16	34.78%

Q4 Thinking about your answer to the previous question as to whether the current policy is, or is not, working for the 'Big Events' programme please give reasons for your answer.

Answered: 21 Skipped: 35

- 4.1 *The products sold complement the Big Events and create a holistic experience for the customers who view it all as one activity happening in one town. The combination is good for Watford as a whole* **[Town and County Markets]**
- 4.2 *Previously consent for Big events has not been given as it's been felt by some at the council that we would be in competition with permanent food outlets - is this official policy?* **[Local Business]**
- 4.3 *It would depend on what other opportunities have been declined. Also the Big Events is a Council programme and therefore the policy is about supporting Council ran events and not others which may be developed. This alone can be a hindrance for organisations looking to*

host events in the town. The policy is probably counter to the emerging Cultural Strategy.
[Business Improvement District]

4.4 *Too much street trading* **[Resident]**

4.5 *More traders would help* **[Anon.]**

4.6 *Great events for families and locals to enjoy. The variety is excellent and appropriate for Watford users. Bring back the German markets/beer Keller's at Christmas.* **[Resident]**

4.7 *Yes but only for limited periods of time and should be more events outside of these organised events.* **[Resident]**

4.8 *It is good to restrict the number of traders; otherwise there is pressure on families who just want to enjoy the free events.* **[Resident]**

Officer comments: a range of views but taken with the breakdown of yes and no responses in question 3 and subject to comments made elsewhere in the consultation, the policy seems to be working well for the Big Events Programme.

Q5 Overall, do you think the current policy has been successful for Watford?

Answered: 45 Skipped: 11

Yes	17	37.78%
No	7	15.56%
Not sure	21	46.67%

Q6 Please tell us why.

Answered: 20 Skipped: 36

6.1 *We still have empty shops, particularly at the top end of town. These are unsightly and spoil the overall look of the town centre.* **[Anon]**

6.2 *How much profit have you made from these events and what was the profits used for is the big question. You must publish income from extra traders for big events to show us that they are value for money and worth putting on in the future. We would also like to see feedback on how these events are received by the general public as a whole. I for one do not visit these events as I have no need, but I am a very successful event organiser large scale and would like to see costs made available to the public.* **[Watford Community Action Group]**

Officer comments: taken with the breakdown of yes and no responses in question 5 the policy seems to be working well for the Big Events Programme.

Q7 Do you think the current policy should be extended to days of the week when there are no Big Events (i.e. same approach adopted as for Big Events)?

Answered: 39 Skipped: 17

Yes	24	61.54%
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No	8	20.51%
Not sure	7	17.95%

Q8 Please give your reasons for your answer.

Answered: 16 Skipped: 40

- 8.1 *It needs to be fundamentally reviewed in light of the emerging Cultural Strategy and the how the BID works in the town. This is currently too much of a Council Policy for Council run events it needs to be more flexible. [Business Improvement District]*
- 8.2 *More street traders are likely to increase the risk of noise and nuisance to residents and existing businesses. There is an increase in the number of residential properties being developed both through planning permissions and 'permitted developments' increasing the number of people potentially affected. We can't put conditions on 'permitted development' conversions to protect residents from noise and nuisance. There is a risk that there will be a rise general noise levels. In addition extending to other days of the week the events are not special and become ordinary - reducing their beneficial effect. [Environmental Health]*
- 8.3 *No – too messy and crowded [Resident]*
- 8.4 *No Retail units are all fighting to stay afloat right now why make it harder for them than it already is. [Watford Community Action Group]*
- 8.5 *More diversity of offering in Watford [Anon.]*
- 8.6 *Not everyone shops at a weekend due to crowds so have some events in the week that people can use. [Resident]*
- 8.7 *Yes - not everyone shops at a weekend due to crowds so have some events in the week that people can use. [Resident]*
- 8.8 *Again would depend on the offering and if it was in line to adding to the Town Centre rather than doing for the sake of doing.*
- 8.9 *The opportunity should be there all year round! It is what will make the town stand out - and provide opportunity for more trade. Also I shop all year around in Watford not just at the time of 'big events'. [Resident]*
- 8.10 *It would be good to see regular street market type stalls pretty much all the way down the parade and the high street to get back to a more market like feel rather than the sorry excuse for a market which we have at present. [Resident]*
- 8.11 *Yes because this will bring more people out during the week and will benefit all business not just event ones resident [Resident]*

Officer comments: taken with the responses to question 7 the view is that the policy should be extended. The responses need to be considered with the responses to questions 9 and 10 in order to determine the best way to amend the policy.

Q9 Do you think the current policy should include provision for commercial street trading during events organised by other organisations?

Answered: 37 Skipped: 19

Yes	22	59.46%
No	8	21.62%
Not sure	7	18.92%

Q10 Thinking about your answer to the previous question, which organisations, if any, do you think the current policy should be extended to in terms of allowing commercial street trading during events they are organising?

Answered: 14 Skipped: 42

- 10.1 *Possibly - depends on what the size, scale and type of event. If they are large enough to attract substantial footfall, then additional street traders would benefit everyone.* **[Town and Country Markets]**
- 10.2 *Any event that is relevant, let traders decide if they want to apply for consent.* **[Local Business]**
- 10.3 *Yes, however, it shouldn't be only during events, this approach will fundamentally limit opportunities - it should be opened up to all year.* **[Business Improvement District]**
- 10.4 *Yes -any that can bring attractive things to our town that make it stand out and different and that can help generate jobs, and trade and nice things to buy for people like me.* **[Resident]**
- 10.5 *I have no specific organisations in mind but each application should be judged on its merits by a combined WBC, Business and lay panel - having declared any vested interests.* **[Resident]**
- 10.6 *If it is market traders than yes* **[Resident]**
- 10.7 *There could be opportunity for registered Social Enterprise & Community Interest Companies to trade which is for Watford community benefit.* **[Resident]**

Officer comments: taken with the split of yes and no responses to questions 7 and 9, and the answers to question 8, the view is that commercial street trading should not only be limited to occasions when Big Events are happening. It is still important to retain some control over the quality frequency and duration of commercial street trading so that it does not become ad-hoc, and the Town Centre does not become cluttered. It is therefore proposed that the policy be amended to include a mechanism for the Head of Community and Environment to approve appropriate events for which the policy will apply. For example an event run by the Business Improvement District may be appropriate.

It is also worth pointing out that this policy does not apply to events held under the Market Charter.

Q11 Do you think that a maximum of six consents per event remains the right level?

Answered: 34 Skipped: 22

Yes	6	17.65%
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No	17	50.00%
Not sure	11	32.35%

Q12 Please tell us why.

Answered: 17 Skipped: 39

12.1 *Depends on if the trader is a good one, maybe they shouldn't be so restricted. Each application and trader should be considered on their merit and what value they can add to the town centre. [Town and County Markets]*

12.2 *6 consents can be used up very quickly if you include non-food traders, and a range of international food. [Local Business]*

12.3 *No- The events space should be available to use throughout the year - the controls should be put in place at the application and consideration stage. The policy needs to be more flexible and embracing - and again needs to be done with a view to addressing the cultural strategy and what is happening at the BID. The town is changing and if this policy does not radically change then there is a significant risk that the majority of the town's activity will focus around the Intu centre, thereby creating a divided town. [Business Improvement District]*

12.4 *Could increase slightly - perhaps to 8-10. The risk is that there would be additional noise and nuisance with an increased number of traders. We would need good controls on the consents given and consider carefully who we give consents to in order to prevent noise and nuisance occurring. [Environmental Health]*

12.5 *Less please [Resident]*

12.6 *No - More diversity needed in Watford [Anon.]*

12.7 *Why limit it to 6?! More the better [Resident]*

12.8 *Traders should be allowed to trade continuously. One day at a time and your constantly fighting red tape - hardly attractive to prospective traders [Resident]*

12.9 *Should be doubled to allow more in [Resident]*

12.10 *If Social Enterprise & Community Interest Companies only, this should be more. If private enterprise then 6 is about right. [Resident]*

Officer comments: These comments and the responses to question 11 indicate that consultees want the number of consents associated with an event to increase. When the initial policy was introduced in 2014 a limit of four consents was in place. It is therefore suggested that the limit be increased to 10.

It is also worth noting that the limit does not apply to events run under the Market Charter, or to non-commercial street trading.

Q13 Do you think that we should continue to limit consents to one day at a time, or should we allow traders to trade continuously for the entirety of the relevant event?

Answered: 33 Skipped: 23

Yes	16	48.48%
No	8	24.24%
Not sure	9	27.27%

Officer comments: whilst this question was perhaps phrased ambiguously, comments made elsewhere in the consultation, suggest that a flexible approach is needed that is dependent on the length and nature of the event. For example if the event lasts two days, an event long consent may be appropriate, but if the event is scheduled to last for 2-3 weeks then shorter consents may be appropriate. It is proposed to amend the policy to allow this.

Q14 What are your views on allowing the promotion of commercial goods or services in the town centre? Please write in below.

Answered: 22 Skipped: 34

- 14.1 *Again, depends on the value they are adding to the town centre offer for the customer. It can become daunting to walk down streets where promotional stands are set up, but on the other hand, they can add to the experience if managed properly* **[Town and Country Markets]**
- 14.2 *I think this an opportunity - where restrictions can be put in place, and income can be reinvested back into the town.* **[Business Improvement District]**
- 14.3 *Promotions are OK if monitored and prices are not too steep as Watford is a family town but I'd becoming more and more commercialised and becoming less affordable for families.* **[Resident]**
- 14.4 *Shouldn't be allowed* **[Resident]**
- 14.5 *Good idea it would allow access to more bespoke and niche quality products from smaller vendors for whom sales and costs would not warrant them having a permanent space.* **[Resident]**
- 14.6 *I do not wish to see promotions of commercial goods or services in the town centre.* **[Resident]**
- 14.7 *I have no issue with it providing the goods for sale are generally within legal and moral decency rules. I.e. no alcohol, tobacco, vapes or food which is clearly not good for you.* **[Resident]**

Officer comments: in some circumstances the promotion of commercial goods or services does not classify as commercial street trading, so a commercial street trading consent would not be needed (although other permissions may be needed). Officers propose to develop a set of guidance and FAQs so that it is clear what types of activities may be permitted.

Q15 Do you agree with the proposal to only issue consents to food businesses if they have a food hygiene rating of four or above?

Answered:	34	Skipped:	22
Yes	27	79.41%	
No	6	17.65%	
Not sure	1	2.94%	

15.1 *We believe that food businesses must have a rating of 3 or above to trade. 3 is broadly compliant; we would not normally revisit on a 3; and a 3 rating can be given verification visits, therefore preventing a 3 business from trading when food safety guidance says that they are acceptable is not consistent with what we do daily with food businesses. We suggest that under section 4(2) of the policy preference is given to food business with a rating of 5, then of 4, then of 3. This will promote businesses who have high ratings and also encourage lower rated businesses to improve their ratings. [Environmental Health]*

15.2 *3.3.c should insist on a minimum 4 star food hygiene rating. [Resident]*

Officer Comments: Whilst the proposal to only issue consents to food businesses if they have a Food Hygiene Rating of 4 or above, the Environmental Health point is a valid one so it is proposed to amend the policy in accordance with their recommendation. This will drive improvement and favour higher rated businesses.

Key points of consultation responses received outside Survey Monkey

Other responses received directly:

Watford Police Licensing Unit

1. As far as we, the police are concerned the current policy is fit for purpose.
2. Our overall concerns would be the amount of street furniture (IE Stalls) in the areas mentioned, this can often mean an area becomes congested and gives rise to ASB within our NTE.
3. The Town Centre and High street need to be carefully managed so the safety of the public isn't compromised and people can move freely around our town centre. We also need to consider how the town centre is set up currently and any additional stalls etc. could compromise our CCTV capability.

Officer Comments: Issues 2 and 3 would be picked up at the event planning stage, in consultation with Hertfordshire Highways.

Head of Culture and Events, Watford Borough Council

1. Can we extend the number of street traders up to 30 at any one time? This will allow the council flexibility if the BIG events transfer to Cassiobury Park and the events space and Parade is used as the market space.
2. Or to allow up to 20 stalls for the BIG events space for specialist continental food style markets, say up to 6 per annum.
3. We feel that the fees should be dropped for the BIG events as currently we agree a contract fee then the fees for street trading are on top. For the operator it feels like we are not joined up and is discouraging traders potentially. We want to provide an incentive to be part of the BIG event rather than place barriers in the way.

Officer comments:

1. As mentioned previously the proposal is to increase the number of consent for an event to 10.
2. This policy does apply to events held under the Market Charter.
3. The policy only relates to what we will allow, not the fees that we charge – these are set by the Licensing Committee.

Economic Development Officer, Watford Borough Council

1. The policy as written (para 1-1) applies to The Parade between Rickmansworth Road and Bentine Lane – why doesn't it extend to the area from Bentine Lane down to the end of the pedestrian area where it joins the High Street / Clarendon Road?

Officer Comments: The policy was introduced in 2014 to allow commercial street trading only in the Events Space, rather than in the Town Centre as a whole. Officers are aware of the developing Town Centre Vision and emerging Cultural Plan and it may be that the policy needs to change to reflect their content.

2. The policy refers to a lot of different people / groups of people by role / title – e.g. Council's Licensing Committee, Licensing Officers, Council's Event Planning Group, licensing team, Town Centre Manager (we've not had one of these since Watford BID came in to operation), events team, authorised officers of the Council, authorised officers, officers, event organisers, Watford and Three Rivers Safety Advisory Group – and I think it would be clearer to streamline and use fewer titles.

Officer Comments: Roles and titles rationalised where possible.

3. The policy (para 2-1) says that applicants should liaise with event organisers to agree a provisionally suitable location, shouldn't we be setting locations as part of an agreed event plan with the organiser before individual street trading licenses can be applied for. This would be particularly important if the event organiser was not the council.

Officer Comments: Proposed policy amended to make this clear.

4. Under selection criteria (para 4-1) it says that goods for sale should complement the event, is it worth adding they should be age and audience appropriate? It also says the events team must approve – if the event organiser is not the council who would approval sit with? The wording of this should be expressed to cover both council and non-council events.

Officer Comments: Policy amended to include age and audience appropriate references. Approval procedures now amended to cover council and other events.

5. I don't think we should rule out granting permission for events outside of the Big Events or for other organisations to organise and run events, for example Watford BID, community events / fairs, craft / specialist markets. This would add diversity to the events programme in the town centre, bring activity to spaces that are not utilised for long periods of time and hopefully attract people to spend money with our town centre businesses as well as at the event. Extending the policy will also help to deliver the actions from the emerging cultural plan and destination management plan work that is currently underway. All events should be of a high standard, complement the Big Events and other programmes running in the town centre, contribute to the delivery of the cultural and destination management action plans and not compete with existing businesses, including the current market.

Officer Comments: covered elsewhere in comments relating to consultation questions 7, 8, 9 and 10.

6. Given the above, for some events, e.g. a craft market, limiting the number of street trading licences to six would limit the attractiveness of events to both organisers and visitors, for others, such as the Big Beach, which takes up a lot of space, six seems sufficient. The nature of the event and the space required for the "core" of it should be the determining factor.

Officer comments: covered by proposing to allow 10 consents for Big Events and other similar events approved by the Head of Community and Environmental Services, and noting that events held under the market charter are outside the scope of this policy.

7. On day consents vs event long consents I think it depends on the nature of the event – if it's a two day event granting an event-long consent may be the most appropriate; if it's a 2-3 week event then this may limit the variety for returning visitors so event-long consents may detract from the attractiveness of the event.

Officer Comments: see response to consultation question 15.

Solicitor representing a Town Centre Business

Firstly, we have been asked to highlight that our client believes that the development plans for Watford, generally, have been and are going to be a very significant success. He believes that this is precisely what Watford needs to rejuvenate the town centre and bring the town centre back to the busy thriving and vibrant area it once was. As your letter advises, and a point with which our client respectfully agrees, the works are making it more appealing to pedestrians and cyclists, are broadening the appeal of the town centre, are encouraging a wider range of visitors to enjoy what's on offer.

In terms of the specifics of the Town Centre Street Trading Policy, Our client does believe that a minimum 4* food hygiene rating should be a compulsory requirement for those wishing to take advantage of the Street Trading Permission. Presumably there are more applicants for these pitches than there are positions and that seems a perfectly legitimate and appropriate means of ensuring that standards are of the highest order. After all these permissions are granted in order to compliment and improve "big events" and so both visitors and residents could and should be offered high standards so as to enjoy the events.

In terms of the number of consents to be granted in one day, we do not object to consideration being given to an increased number of street trading consents. Provided that the standard is maintained then these seem to be a welcome contribution to the big events and making the events as vibrant and successful as possible seems to be to everyone's advantage. Perhaps six might be considered for, say the next three such events with an opportunity for a further two or even four consents to be granted (subject to assessment, standards etc.) thereafter.

One further point to be made is that with regard to the big events the vendors should be responsible for all litter and mess created by their businesses and their customers at the conclusion of the event. Our client does not have concerns about litter, certainly not on Market Street but believes that if the city is looking to develop and promote itself then obligations imposed on street vendors to ensure that the premises is left "immaculate" are not unreasonable.

Officer Comments: supportive of current approach and proposed amendments.