

By Email: [streetentertainment@westminster.gov.uk](mailto:streetentertainment@westminster.gov.uk)

24 February 2020

Dear Sir or Madam,

**Response to Draft Busking & Street Entertainment Policy – February 2020**

Thank you for the opportunity to respond to Westminster City Council's consultation on Busking and Street Entertainment in Westminster. Our response is primarily focused on those areas of Westminster City Council that New West End Company (NWECC) works across.

NWECC is a business partnership of 600 UK & international retailers, restaurateurs, hoteliers and property owners in the world's top shopping and leisure destination, anchored by Bond Street, Oxford Street and Regent Street. We work across 74 streets, representing 216,000 employees.

We work in partnership delivering transformational projects, sustainable placemaking and management, destination marketing, advocacy, inward investment and commercial insights.

NWECC understands the benefits of street entertainment to cultural diversity and city enjoyment. Increasingly entertainment, both in-store and in the public spaces, is an integral part of creating a wider experience which encourages more people to visit and to dwell longer in the West End.

As an International Centre the West End is actively looking at ways to enhance our visitors' experience and NWECC and its member businesses work closely with Westminster City Council on events such as The Crown Estate's Summer Streets initiative.

Busking is another daily entertainment which creates a welcoming atmosphere for visitors. But, as benefits an International Centre, the quality and distribution of busking throughout the district needs to be curated to ensure quality and prevent nuisance and abuse.

We therefore welcome this guidance, not as a means of restricting busking, but as a way of ensuring that it adds to the wider appeal of the International Centre.

With regards to the overall draft Busking & Street Entertainment policy, we have the following comments, suggestions and/or observations:

1. For new applicants, it is not compulsory to join the Busking & Street Entertainment Forum. NWECC believe this should be a mandatory condition for a licence to be approved.



2. The Busking & Street Entertainment Forum is facilitated at council officer level. NWECC believe this should involve wider BID representation and be facilitated by a senior member of Westminster City Council (WCC). The meetings should be minuted, effectively chaired with attendance tracked for all busking/street entertainment acts.
3. It is not clear whether City Inspectors are 'Authorised Officers', able to enforce within regulated areas. This should be clarified within the policy document.
4. NWECC believes BID's should have a voice during the application stage. There doesn't seem to be a consultative phase when new acts are being considered. Each BID area might have subtle nuances which lend themselves to a particular type of music or act. An application framework which identifies these nuances would be welcomed.
5. The document does not explain the training which 'Authorised Officers' undertake. NWECC are keen for NWECC Security and Cleansing personnel to have the appropriate training and seek clarification on this.
6. The document assumes the acts have knowledge on what might be deemed an obstruction, a public highway safety concern or an un-manageable pitch. How can NWECC be reassured the acts can manage pitches themselves?
7. Will the pitches be incorporated into the OSD plans, and what are the long-term management plans with Crossrail delivery and estimated footfall increases?
8. NWECC would like a centralised enforcement capability within WCC which sits outside the BID funded City Inspectors. If such a unit is not planned, there might be increasing pressures on NWECC City Inspectors to manage the acts, taking resources away from other on-street concerns.
9. NWECC believe 'out-of-hours' enforcement capabilities are essential and would like to understand how this might operate.

Thank you for considering our suggestions and observations during this process. NWECC are keen to work with WCC to deliver the proposals and look forward to the final policy document.

We are of course happy to discuss any of these points further should that be beneficial.

Yours faithfully



**Jace Tyrrell**  
**CHIEF EXECUTIVE**

