

Consultation Responses Dec-Jan

Met Police

Good Morning [REDACTED]

I must apologise for not having sent a response.

[REDACTED] has reviewed the document and is very supportive. No current conflicts with planned operations, we will continue to review and monitor any possible displacements.

Thank you,

[REDACTED]

[REDACTED]

I write on behalf of the [REDACTED]. There is no busking within the Westminster section of Knightsbridge, but there is a good deal in Hans Crescent on The RBKC side of the border separating the two Councils.

It would be sensible if Westminster had a unified Street Entertainment Policy with Local Authorities with whom they have common. borders.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir/Madam,

Further to our representations in October 2020, thank you for the opportunity to comment again on the 'Busking and Street Entertainment in Westminster Draft Policy 2020'. Please find The [REDACTED] [REDACTED] response to the January 2021 consultation attached.

We look forward to discussing further with officers. Please kindly keep us informed of future updates in relation to this policy.

Kind regards,

[REDACTED]

The Street Entertainment Project Team
Policy and Projects
Westminster City Hall
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64 Victoria Street
LONDON
SW1E 6QP

streetentertainment@westminster.gov.uk

29th January 2021

Dear Sir/Madam

BUSKING AND STREET ENTERTAINMENT IN WESTMINSTER: POLICY 2020

Thank you for the opportunity to comment further on the 'Busking and Street Entertainment in Westminster Policy 2020' which was considered for adoption by Westminster City Council at Full Council in December 2020.

The [REDACTED] are committed to working in collaboration with Westminster City Council to create brilliant places in the heart of London's West End. We were grateful for the opportunity to respond to the consultation in late October, and would like to take the opportunity to respond on specific streets and highlight again some of the points raised in our submission.

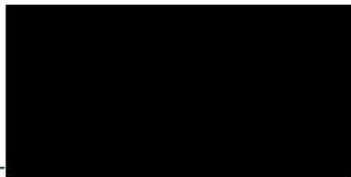
Code of Conduct

We support the objectives of the code of conduct, however we encourage suitably controlled entertainment so as not to inhibit other uses in the area. We acknowledge the quarterly monitoring and annual review. However, we would still welcome greater collaboration with Westminster City Council and other stakeholders to ensure the success of the policy through suitably robust oversight and enforcement in addition to performers' self-regulation in the event that the code of conduct is not being adhered to.

Pitches

Three of the designated pitches are located within [REDACTED]
As commented previously, we have no objection to the principle of proposed 'Pitch 6: Eros Statue', provided that it is unamplified, given that it is proposed in an area with more space. We are still unable to support 'Pitch 4: Princes Street' or 'Pitch 5: Glasshouse Street' for the reasons set out in our enclosed October 2020 representations.

[REDACTED]

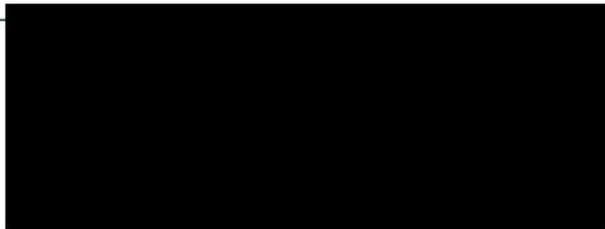
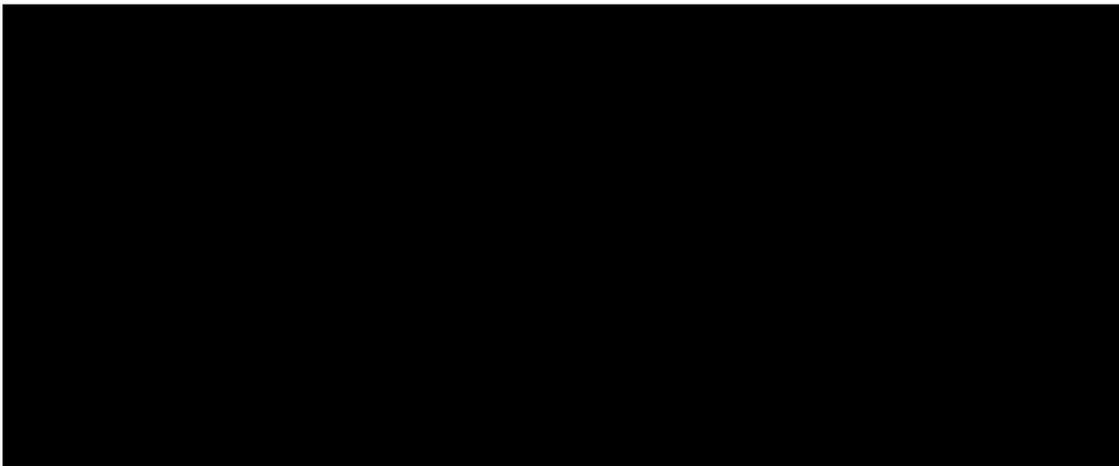


We ask that the aspirations of the draft policy document are balanced with the need to support our customers at a time when the retail and office markets are working very hard to recover from the impacts of Covid-19. We wish to work in collaboration with Westminster City Council to provide our customers with the best chance to thrive. This includes avoiding noise nuisance and costs historically experienced in relation to unamplified street entertainment (e.g. installing triple glazing).

We have discussed the above position with officers and understand that alternative, more suitable locations are being explored in place of Pitches 4 and 5. We would welcome further discussion in this regard to find the best solution to support both street entertainers and the recovery of the West End.

I trust that the above comments are clear in expressing our views and I would be grateful if you could keep me informed of future updates. Please do not hesitate to get in touch should you wish to discuss.

Yours faithfully





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30 October 2020

Dear Sir/Madam

BUSKING AND STREET ENTERTAINMENT IN WESTMINSTER: DRAFT POLICY 2020

Thank you for the opportunity to comment on the 'Busking and Street Entertainment in Westminster Draft Policy 2020'. I set out [REDACTED] response below.

Background

[REDACTED] are committed to working in collaboration with Westminster City Council to create brilliant places in the heart of London's West End. As the long term owners and managers of the majority of Regent Street and around half of St James's, we take a long term view on our assets which include some of London's most historic and famous spaces. As part of this, we share an ambition of ensuring that Central London continues to be an outstanding place to work, live and visit.

Most recently, [REDACTED] have been working in partnership with Westminster City Council to deliver the Regent Street Public Realm project as part of a greener, safer and more accessible West End. The plans comprise pavement widening, securing approx. 5000m² of additional pedestrian space to enable a safer environment to help to support businesses. This also includes the delivery of new seating, street greening and cycle hubs. The plans will reconfigure traffic flow by reducing Regent Street to one vehicle lane in each direction and will introduce a dedicated cycling lane for the very first time. This will support our objectives of enhancing the experience for visitors and users, improve air quality and increase accessibility of the street.

Street Entertainment

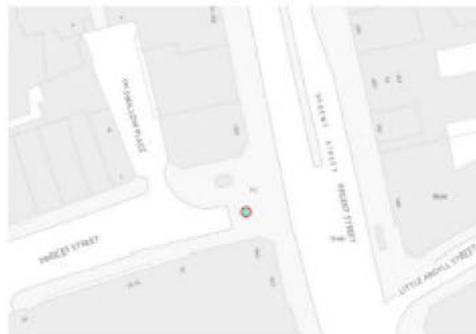
[REDACTED] agree that music and entertainment in the public realm is an important element of placemaking, if it is suitably controlled so as not to inhibit other uses in the area.

We therefore support the principle of the introduction of the 'Busking and Street Entertainment in Westminster: Draft Policy 2020' and the proposed Code of Conduct. This is particularly important in terms of safety, performance hours, mitigating nuisance, avoiding obstructions in the street and limiting entertainment to designated pitches.

To ensure the success of the policy, we would welcome the opportunity to work in partnership with Westminster City Council and other stakeholders regarding oversight of street entertainment activity. Suitably robust enforcement is key in addition to performers' self-regulation, in the event that the code of conduct is not being adhered to.

We note the following policy extracts relating to specific pitches proposed within our Central London portfolio, and provide our responses beneath each of these:

1. *"Pitch 4: Princes Street: This pitch is suitable for all performances that need no more than 2 metres in diameter space. Due to the proximity of business premises amplification, brass, wind percussion and percussive instruments are not permitted".*



Comment: We would not be able to support any proposed pitch on Princes Street. Over recent years, our customers have been increasingly vocal about the detrimental effects of busking on office environments and customer experience.

Princes Street will soon be on a busier route between the new Crossrail exit and Regent Street. This location also forms part of the Regent Street Public Realm proposals and has been identified for a new cycle hub, seating and planting, alongside enabling sufficient space for social distancing.

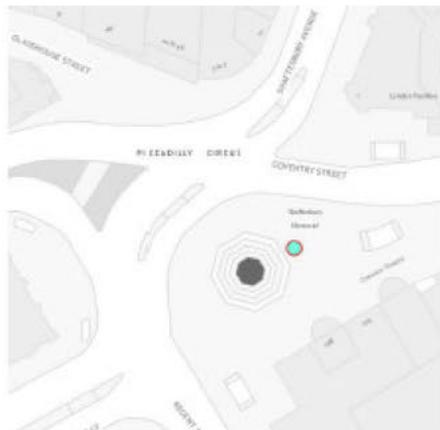
Overall, we do not consider it appropriate or feasible for a 2 metre entertainment pitch to be accommodated in this location.

2. *"Pitch 5: Glasshouse Street: This pitch is suitable for all performances that need no more than 1.5 metres in space. Due to the proximity of business premises amplification, brass, wind percussion and percussive instruments are not permitted. Due to the proximity of the road this pitch is more appropriate for walk-by performances that do not attract audiences".*



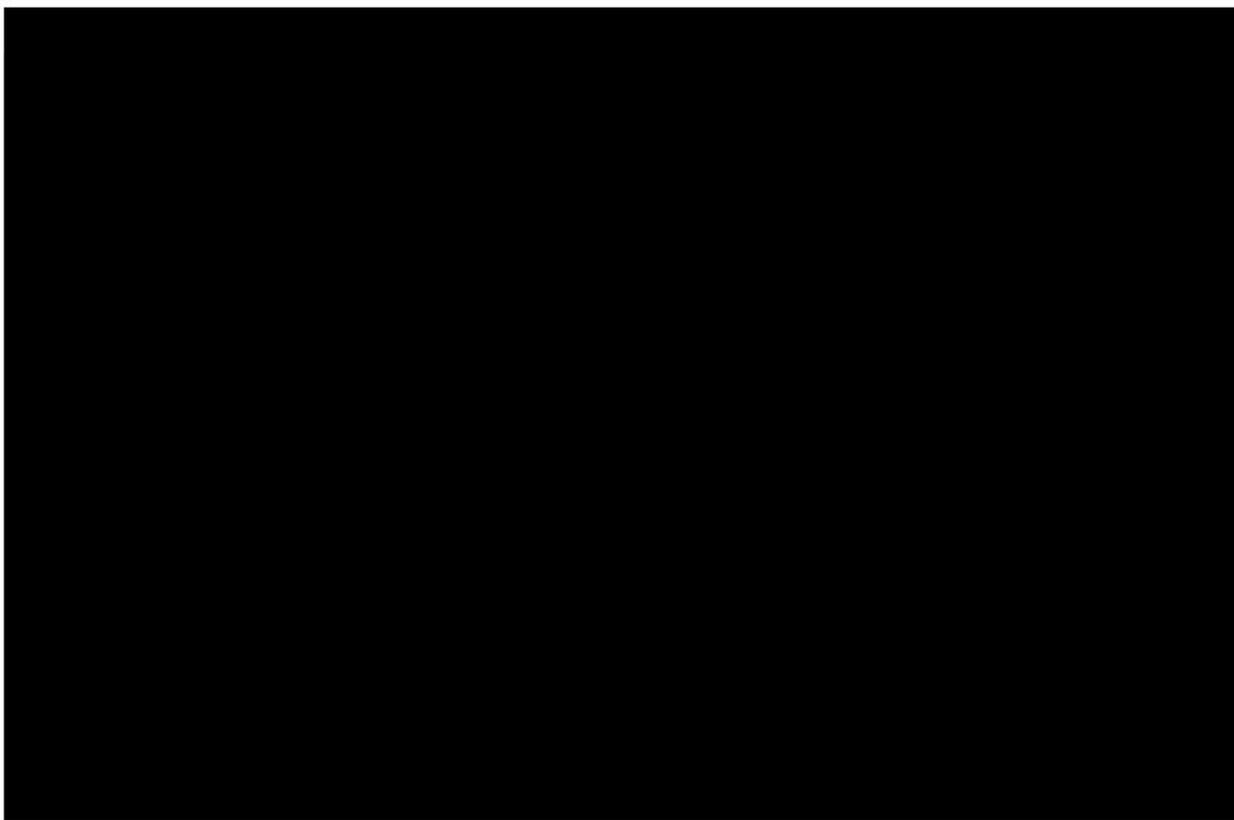
Comment: We are unable to support a pitch in this high footfall location, as it is anticipated that this would form an obstruction to pedestrian flows. This is a busy location next to Piccadilly Circus tube station exit. It is an area where we are seeking to increase space for pedestrians through our Regent Street Public Realm scheme, as it is an existing 'pinch point'. The same issues with noise nuisance noted at Princes Street also apply.

3. *"Pitch 6: Eros Statue: This pitch is suitable for all performances that need no more than 3 metres in diameter space and is appropriate for performances that attract larger audiences providing they do not cause an obstruction to passing pedestrians, nearby premises and the entrance to the tube station. Due to the proximity of business premises amplification, brass, wind percussion and percussive instruments are not permitted".*



Comment: Given that this is proposed in an area with more space, we have no objection to the principle of a proposed pitch in this location, provided that it is unamplified.

I trust that the above comments are clear in expressing our views and I would be grateful if you could keep me informed of future updates in relation to this emerging policy. Please do not hesitate to get in touch should you wish to discuss.



Please think again ! what on earth are you human beings doing to each other. The need of Power in man is so great that we have to control street entertainers. They are only buzz you get walking around London. Charles Dickens would be sadden by this and in 2021 you just want to control everything and everyone.

I hope your panel gets to read the above. You must rethink and realise you are destroying the beauty of entertainment in London.

Regards

[REDACTED]

[REDACTED]

Dear Street Entertainment representative,

Thank you for receiving my message. In recent years my published monographs entitled "Adsensory Urban Ecology" has provided valuable insights relevant to street entertainment in City Westminster.

Several of the case studies in my book [REDACTED] (volume two) engage critically with the empirical observation that, in the post-industrial urban ecology of inner-city regeneration, adsensory technologies extend avariciously into the infrastructure of neoliberal, managerialist gentrification. In addition, the book explores the forms of capital accumulation which are emerging from the integration of adsensory technology into the gentrification of post-industrial urban spaces, and examines a new form of capital accumulation in inner-city gentrification, predicated on the (de)generative integrity of adsensory financialisation.

Rigorous academic reviews include : Salleh, A., (2019); Accumulation in a Post-Industrial Ecology - Progress in Political Economy (PPE). Available at: <https://www.ppesydney.net/accumulation-in-a-post-industrial-ecology/>

Application and community engagement include: Bath Heritage Watchdog (2019); Bath Press News - Interest From A University, Bath Heritage Watchdog. Available at: <http://www.bathheritagewatchdog.org/bpress.htm>

Application and consultation engagement include: City of Westminster (2020); Busking Consultation; A New Policy for Street Performance in Westminster, Busking consultation | Westminster City Council. Available at: <https://www.westminster.gov.uk/busking>. With regards to the latter, the following was submitted to the Westminster City Council busking consultation public liability insurance proposals for buskers: Hitherto, the public liability of busking negligible; but now the risk ratio of £2million liability will either be a deterrent to busking or a multiplier of public liability insurance sales, as the industry attempts to socialise the risk probability of a claim, into the general population of public liability insurance. Individualising busking risk: #Unfare.

Furthermore, contributing to the autumn 2020 online campaign <https://savelondonbuskers.com> the following series of social media posts authored by Dr. Pamela Odih, garnered thousands of impressions:

"@CityWestminster's busking regulation: "You should hold public liability insurance of at least £2 million". Surely, in accord with "Law of Fixtures" (1876): "Quic quid plantatur solo, solo cedit". Thus, city leaseholders have public liability to insure protection of the busker?"

For, it is my contention that the City Westminster busking regulations constitute a privatisation of public recreational space through an adsensory financialisation of public liability insurance; and an

aesthetics of gentrification integral to adsensory urban ecology. Furthermore, my application of “Quic quid plantatur solo, solo cedit” to the plight of the City Westminster buskers, interpolates with the January 2021 announced Ministry of Housing, Communities and Local Government land regeneration policy entitled: "Right to Regenerate' to turn derelict buildings into homes and community assets".

I welcome your insights on the issues I am raising. Thank you for your time.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I am not a Street Entertainer and hence I have no ‘axe to grind’!

I am however a resident of [REDACTED] and used to spending leisure time at Covent Garden, Leicester Square, Trafalgar Square etc – all ‘Hubs’ of traditional street entertainment that is beloved of the endemic population as well as visitors world-wide.

Frankly – you lot, should be hanging your heads in shame !

YOU are KILLING off our culture; our traditions; our heritage.

What next will you do – KILL off what is left of our Pubs?

Absolutely DISGRACEFUL.

[REDACTED]

[REDACTED]

[REDACTED]

H [REDACTED]

I have submitted a response to your questionnaire today, but for completeness I thought I would copy and paste our substantive comments for you in an email.

We are largely supportive of the council’s proposals to regulate street entertainment in Westminster. Like many we hope it will encourage better quality street entertainment across the West End, while allowing enforcement against other elements that seek to exploit local visitors and disturb those living and working here. However we are now in very different times. We still very much support the principle, but we are now very concerned about the pitch located in Chinatown and it’s suitability as a pitch during a global pandemic.

In reference to that we have specifically made the following comments:

As the [REDACTED] we are responding on [REDACTED].

Chinatown has been severely impacted by this Coronavirus pandemic including a sharp reduction in footfall during the months leading up to the first lockdown in March 2020. Therefore it's recovery is vital to the many restaurants and other businesses that are located there. We are concerned that these plans were drawn up before this pandemic had affected the country and we are now in a completely different place.

Al fresco dining is now a key activity in Chinatown, where the many food, drink and leisure businesses have embraced a whole new way of working. With social distancing measures likely to be with us for years rather than months, the outdoor space is key and we will be working with your Placeshaping, Highways and Licensing teams to ensure that Chinatown can recover from this pandemic with continued use of outdoor space for alfresco dining.

This means that the designated pitch you have located on Wardour Street is unlikely to work well with this new street environment. Of all of the pitches in your Policy, this one is located on in a very restricted area for space, it is the only one in a location dominated to this extent with food outlets. With tables and chairs licenses and the high footfall this area attracts, while social distancing and al fresco remains, we do not consider this location appropriate any longer for a pitch. Street entertainment is intended to gather crowds and encourage people to stop, I think this would mean that this junction could no longer operate in a COVID safe manner.

The principle of having a pitch located here has been supported in normal times, but these are not normal times. [REDACTED] strongly recommends you reconsider this location in the light of the pandemic and consider reinstating it at a more appropriate time in the future.

Please do keep in touch and let us know what is finally decided and also when the Policy is likely to come into effect.

Thanks

[REDACTED]

[REDACTED]

Dear sirs and madams,

We were all poor at what we do once. Some still are! Let them have a go and earn some coins. Have you watched A Streetcat Named Bob? You should.

Busking is a way of bringing life into a town and any reinforced regulation is unnecessary and only pleases a few miseries who should not control the enjoyment of the majority of human beings with feelings, who appreciate the arts in all its forms. Those who complain probably have 'noise' cancelling headphones anyway.

Westminster council could find better things to do with its money than harassing the poor artists who already suffer worse than most.

Respectfully

[REDACTED]

[REDACTED]

Dear Street Entertainment Team

In December - and while under Tier 2 Regulations - I accompanied a young busker friend to perform in Oxford Street on a few occasions. This seemed to be well received by pedestrians and shoppers - although numbers were clearly much reduced from the usual December footfall - and I do not believe that we caused any inconvenience to anyone through our presence, performance or volume. The repertoire was songs from the shows and Xmas tunes, performed against backing tracks using a small portable amplifier.

We were aware that, following the introduction of your new Policy in 2021, the opportunities to perform in this way in Westminster will be severely limited, in particular as the number of locations where amplification will be permitted is negligible, and they are not, in our view, particularly attractive locations for the repertoire performed by my friend. But, for us, this is now an academic point anyway, as my friend will shortly relocate from London to continue studying elsewhere, so we shall not trouble you again!

However, the point I wanted to make to you is this. On three occasions when we were in Oxford Street, we relocated from our first position to a second position due to noise from other sources that was considerably overwhelming the performance my friend was giving, namely:

- i) a group located outside Nike at Oxford Circus (by the tube station stairs) with a very sizeable drum kit / percussion outfit but unamplified - very loud even though we were further down Oxford Street, opposite Great Portland Street;
- ii) music etc played by shops from within their premises but extremely audible outside - I didn't make a note of the shops concerned (also noticed this issue in Regent Street); and
- iii) during an evening performance, the very and excessively loud amplified "music" from the various cycle rickshaws / pedicabs, both those with passengers and those stationary awaiting custom. 2 of these parked themselves at a junction very close to the position we had taken up, the sound was overwhelming, so we relocated.

So in bringing in your new policy targeted against buskers and street entertainers what comparable measures will Westminster Council be introducing AND enforcing against others who also generate considerable noise nuisance to the environment, particularly thinking about my examples ii) and iii) above, as I hope you will agree that it is entirely unfair and unjust for street entertainers to be subject to strict regulation under your new policy if other noise sources in the same locations can continue unfettered.

I look forward to your reply with interest.

Yours truly

██████████

██████████

██████████ on behalf of ██████████ relating to Covent Garden, in addition to my previous email from last year requesting that no street performance takes place on highway before 11:00 a.m, can we please ask that the amplified pitch on James St can be for any performance, not just vocal performance

Thank you

██████████

[REDACTED]
Keep the buskers At Covent garden in Spring

[REDACTED]
I will ask the Highways Team to review the document as requested.

Please note the only comment I have at this stage is that the proposed location on the King Charles I roundabout (on the south side of Trafalgar Square) is inappropriate from a road safety perspective.

Regards,

[REDACTED]
[REDACTED]
OK - it will still be worse than the ones on the corner who typically point directly away from us. And presumably there will be far more amplified buskers than the annoying one at present.

[REDACTED]
Good Afternoon Busking and Street Entertainment Team,

My only concerns from a Highways perspective are how will we approach the removal of any Street entertainment in the case of having to erect a temporary structure or carry out any highway remedial works? As you are probably aware, we do have to carry out emergency highways remedial works sometimes, so early notification cannot always be given.

Regards,

[REDACTED]
[REDACTED]
[REDACTED]
I see.

To be honest it does not. That roundabout is at the end of my street and the nuisance from amplified busking will be even worse for us than on the corner as there are even less obstructions in the way and undoubtedly it will be aimed in our direction unlike now where it is aimed away from us.

I think it is an excellent idea to clamp down on buskers in my neighbourhood - especially those using amplification - but moving them all to a place that impacts residents is not at all a good idea. We will be subjected to a noise nuisance from every busker who uses amplification on that spot.

I maintain that the end of Northumberland Avenue is not a suitable spot for amplified music as it impacts residents.

Thanks for the clarification. Even though it is quite depressing news.

[REDACTED]
[REDACTED] Message -----
[REDACTED]

[REDACTED]
Subject: RE: nuisance form busking / Northumberland Avenue

[REDACTED]

Just to confirm the Waterstones pitch is proposed as a non-amplified pitch.

There is one proposed for the round-about but hopefully as this is surrounded by traffic sound should not travel in the same way from this pitch. Hopefully this is some reassurance?

Our policy can be found [here](#) if you want to look in more detail at the proposals.

Many thanks,



Greetings,

I'm writing on behalf of residents at [redacted]

We've recently received notification of the Council intention to implement the busking and street entertainment policy which was presented to the Full Council on 9th December, and we're extremely disappointed that our views and concerns, raised through your feedback sessions, have not been taken into consideration.

[redacted] of the proposed pitch site on Vere Street.

The proposed pitch location would sanction what is currently a grievous nuisance which not only negatively impacts our daily lives and the well-being of resident families, but also affects the value of our properties. With the current situation many of us have started working regularly from home, and the repetitive and loud tunes are causing extreme distress.

The Council policy asks for compliance on a number of points, such as producing a varied repertoire, not causing any nuisance to persons in nearby properties, etc. but we doubt there is any effective way to regularly monitor and enforce such rules.

Moreover, even if at the Vere St location the policy puts a ban on amplification, brass, wind and percussion instruments, that will not spare local residents the blight of repetitive tunes, loud singing or tormenting high-pitched string instruments such as violins.

If a local pitch is absolutely necessary, our suggestion would be to pick a location off the main thoroughfare of Oxford St, either at the north end of Vere St or at the north entrance to Bond St, where the direct line of hearing to our residences would at least be broken by intervening buildings. We ask the council to urgently reconsider this decision and apply the relevant corrections to the policy.

Best regards,



Hi

We are frequently subject to very loud amplified music originating from the site whenre Northumberland Avenue meets Trafalgar Square.

The busker plays the same few tunes over and over again and this noise nuisance is audible throughout our home which is located [REDACTED]. This applies even with the double glazed windows are closed.

Please can this area not be permitted for amplified music as this is negatively impacting residents.

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thank you for researching and forming this policy. Busking activity had grown to a level of Nuisance.

I reside on [REDACTED], and am particularly happy there will be no busking on that street.

[REDACTED]

[REDACTED]

[REDACTED]

Thank you for your response.

Please can you put this in as a formal response to the amplified pitch on the North Terrace of Leicester Square, Pitch 9.

We are pleased that the scheme is happening and we are fully supportive. It should be a big improvement and it is welcome.

We are concerned that there is a belief that pitch 9 is potentially going to be less impactful as performers will no longer have to compete to be heard on the North Terrace, so sound clash should no longer be an issue, and as one of the few amplified pitches the performers should be incentivised to manage their sound.

On the point of sound clash, sound clash is not currently an issue as the acts on the NE and NW corners of the Square both point in different directions. They can, and do, both play as loudly as they like, with no sound clash issues. The concern for us is more that with pitch 9 being the only amplified pitch, amplified acts will compete and queue up to play there, and so we will only have amplified acts there, whereas currently we have some quiet ones offering us a little respite. This, the fact that the current orientation of the pitch being towards buildings and not towards a wide open area, and the lack of other amplified pitches in the area, underlines the need to reduce the sound nuisance from pitch 9.

On the point of incentivisation, I can see that the licensing should make the performers more accountable and so more responsible, though volume equals reach and number, and so earning potential, so it will need managing, and so we formally request that there is an objective definition of 'nuisance' given so we have something to measure it against. We also ask for details of how the

scheme will be policed, to both deal with licensed performers that are causing 'nuisance,' and unlicensed performers.

I also formally request that Pitch 9 is reorientated by 180 degrees so the noise from the performers there, is directed into the wide open space of Leicester Square where it can dissipate more easily, rather than bouncing between the buildings in front of it.

I have walked the area around pitch 9 and the 'highway' is so wide, it bluntly does not matter where it goes. The current pitch actually partially blocks access into the square as well as part of the north terrace when busy. Putting it the other side of the Terrace, or in the middle of the Terrace, facing the square, will only block an equivalent part of the Terrace, and will also remove the block to the access to the Square. It will not in any way impede access for emergency vehicles. In any case, if the acts are less noisy than now, they will have smaller groups of people watching, so any potential obstruction will be less of a concern.

Given we now seem to be stuck with an amplified pitch near where we work, we need to work with it, so getting pitch 9 rotated through 180 degrees so the sound is directed at an open space, rather than close to and directed towards our buildings, would lead to a material reduction of the impact of it on our lives and ability to work.

Please let me know if I can assist further.

[REDACTED]

[REDACTED]

[REDACTED]

Why on earth are you legalising street busking? Why can't we have some peace and quiet? How dare you inflict your choice of so called "music" on others.

[REDACTED]

[REDACTED]

I have filled in the survey in which my comments are that the policy is fine if there is proper enforcement to prevent itinerants and illegal operators.

[REDACTED]

[REDACTED]

Further to [REDACTED] email below, I also share this concern.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

All noted. I only have one issue and that is the operating times for Covent Garden (10am) which will create a conflict with the current loading arrangements (up to 11am) and is therefore in my view a safety issue.

I know [REDACTED] has formally responded / objected on this point.

Thx

K

Hi, I represent [REDACTED] pedestrian spaces on behalf of WCC

The timing of licensed street performance in Covent Garden has now been brought forward to 10:00 AM compared to the long standing code of conduct which permitted later hours and so as a consequence of your proposals, these pitches which are on highway, conflict with operational hours of the highway which in the case of the Piazza is upto 10:30 and James St 11:00. The highway, when operational is open to vehicular servicing traffic, it cannot also be open for street performance at the same time

Even if pitch locations were adjusted slightly then watching crowds would still be standing on operational highway

It would be unsafe to permit street performance on operational highway, this would not be permitted on Strand for example and so we ask that no street performance in Covent Garden commences earlier than 11:00 daily to keep the rules simple for performers to follow

With the performers holding Licences which lawfully permit performance at that time, not to make these changes will result in regular conflict between performers and drivers with City Guardians placed in an untenable position regarding enforcement

We have made two written representations in respect of this issue in the prior consultation, and so could you acknowledge receipt

Thank you

[REDACTED]
Dear whoever reads this,

This is absolutely disgraceful that this has been accepted, and Westminster council should be ashamed of themselves for doing this.

Not only is this the most challenging time for everyone, and to add this to performers is outright hideous and selfish, but you are also ruining history and a sting London cultural aspect.

I truly hope that this will change before it comes in effect.

All the people who are privileged enough to live near where these performers practice, would have know about them and hence they accepted that when they moved in to the area. Absolutely outrageous that the rich have once again won and they have the power to change something so London.

[REDACTED]
[REDACTED]
Keep the buskers at Covent Garden