

# London Borough of Tower Hamlets Markets Improvement Plan

2022-2027



# Table of contents

Foreword from Mayor John Biggs and Councillor Motin Uz-Zaman	<b>3</b>
Purpose	<b>4</b>
<b>1.0</b> The vision for our markets	<b>6</b>
<b>2.0</b> Priorities	<b>7</b>
<b>3.0</b> Introduction	<b>8</b>
<b>4.0</b> London's high streets and markets	<b>10</b>
<b>5.0</b> Consultation overview	<b>27</b>
<b>6.0</b> A plan for our markets	<b>45</b>
<b>7.0</b> What we will do - proposals	<b>49</b>
<b>8.0</b> Funding and support	<b>58</b>
<b>9.0</b> Evaluation and Performance Monitoring	<b>64</b>
Appendices	<b>67</b>

## Foreword from Mayor John Biggs and Councillor Motin Uz-Zaman

Our borough has some of the most well-known street markets in London with hundreds of years of history between them. From Petticoat Lane to Roman Road and Brick Lane they serve our communities and some also attract tourists from far and wide.

For all the success of specialist markets like Columbia Road flower market and our smallest at Roman Road Square (Globe Town), other markets are struggling to adapt to the changes in their neighbourhoods which are bringing new people to the area and changing shopping habits.



This was the situation with many of the borough's markets before the Covid-19 pandemic which started in March 2020 and continued into 2021. The pandemic has impacted our markets hard with many traders, deemed non-essential (under government restrictions), unable to trade for several months. This created a deficit on our market account and required our street trading team to adapt quickly in creating new market layouts to accommodate social distancing guidelines.

Our markets are located in town centres, on high streets and close to the city. In some, they rely on tourists and office workers as customers, and both are greatly reduced during 2021. When they will return, we do not yet know. As such, our markets have more of a challenge than ever in adapting to changing shopping habits, working patterns and neighbourhoods to ensure they thrive in future. Roman Road and Petticoat Lane markets are deemed to be 'at risk' and urgent action is needed to reverse their decline.

Between April and June 2021, we surveyed shoppers, market traders and businesses to hear what they liked and didn't like about our markets and how they would like them to change (if at all). We were delighted with the response and nearly 700 people shared their thoughts with us. People told us they want to see more variety and higher quality goods for sale at our markets, to be able to pay by card more often, and to see a preference given to start-ups and residents when vacancies arise.

The Improvement Plan builds on these findings and sets the scene for London's markets, street trading and high streets and how they impact the borough's markets. The Plan proposes a vision for our markets and key priorities for the five years ahead (2022-27) and into the future. Now is the time to invest in our markets with our first Markets Improvement Plan to ensure our markets continue for many more years to come.

## Purpose

In 2021 the council commissioned The Assembly Line, a high streets and markets consultancy to undertake a public consultation to determine the long-term vision for our markets.

The project included extensive engagement with residents, businesses and market traders via an online and in-person survey supported by individual and group meetings with internal council departments and external stakeholders. It also reviewed the operational and management model in place, and how legislation constraints could be overcome through discussion with other London boroughs.

The consultation led to the creation of the council's first Markets Improvement Plan. The Plan sets the scene for London's markets, street trading and high streets and how this impacts the borough's markets. In tandem with the Improvement Plan, individual action plans were developed for each market and a more focused report delivered on Whitechapel Market as part of the Whitechapel Road Improvement Programme.

The Plan identifies 10 themes on which respondents commented most frequently and that will have the biggest impact on the future of our markets. It also references known funding opportunities and performance metrics for how change can be monitored. These themes are:

- Business support and enterprise
- Commodities
- Enforcement and regulation
- Marketing
- Operations (trader facilities)
- Partnerships
- Place
- Programming
- Sustainability
- Trading hours and days

The consultation showed that overall respondents were supportive of, and indeed keen to see, changes to the council's markets. The results however also indicate the disconnect between how the markets look and the goods they sell, when compared to the items that shoppers want to buy and the experience they wish to have. Without adapting the council's market offer to align these two elements more closely, the markets may not survive.





Proposals that apply across all markets include:

- Training for market traders to raise standards
- A robust set of policies to enable markets to adapt to widen commodities sold, meet Trading Standards, improve the look and feel of markets and to attract new traders
- The creation of Trader Handbook to set standards of trading and support enforcement as a last resort
- An online presence for all markets
- Improved trade facilities focusing on storage, toilets and provision of utilities
- Partnership working between market stakeholders and the council
- Special events programming
- A sustainable approach focusing on waste management, reduced plastic and transport
- Reviewing market locations (for new markets) and trading hours

Details of these proposals can be found in section 7.0 and individual action plan proposals in Appendix II.

Market Services will be responsible for delivery of the Improvement Plan, working with other services and stakeholders where it will be beneficial.



## 1.0 The vision for our markets

The council's markets should reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community. The markets should offer a range of products or speciality goods that are of high quality and at a range of price points. They should contribute positively to their town centre or high street and build strong relationships with businesses and other stakeholders around them.

Each market needs to define its own vision addressing the following criteria:

- Have a distinctive character, be it as a tourist attraction or serving the local community for day-to-day goods
- Have a clear offer in relation to what they sell, and when and how it is sold
- Where possible, sell goods that diversify what is available in the area, not replicate what is already available (including local shops)
- Prioritise start-ups and local residents when considering applications for new traders. This could be addressed by variations in pricing
- Continually striving to raise their standards of operation
- Communicate and engage with their local communities through partnerships and clear marketing

The markets as a group should provide a cohesive shopping experience for the residents of Tower Hamlets, its workers and those who visit from across London, the UK and overseas. As such, the markets need to interact with each other, especially where they are in close proximity, to leverage opportunities and boost local economies.

## 2.0 Priorities

From the surveys, interviews and observations, several themes emerged which frame the plan. These are:

**Business support and enterprise:** How the council can better support existing traders, start-up businesses and residents in the borough.

**Commodities:** What is sold at the markets and how these goods relate to what shoppers want to buy.

**Enforcement and regulation:** The markets office and trader representatives need to work together to raise standards, the market environment and (as a last resort) to enforce.

**Marketing:** How shoppers and other audiences can find out about the markets, the traders and buy goods.

**Operations (trader facilities):** Traders need improved facilities to be more successful which in turn could increase optimism and improve the market environment.

**Partnerships:** In some locations relationships between businesses and the market are far from harmonious. A joint approach is needed to improve the town centre or high streets for all users rather than the market being viewed as a negative contributor.

**Place:** The markets exist in the context of the high street or town centre in which they are located. There is limited acknowledgment of this in relation to the market layout (pitch plan), interaction with shops and access to other users.

**Programming:** Special events and occasions featured highly in feedback and some markets needs to be treated as more of an event to encourage visitors.

**Sustainability:** The council was one of the first in the country to declare a climate emergency and is at the forefront of addressing climate change yet many comments about the markets refer to the waste, a lack of bike racks and a desire for less plastic and more eco goods at the markets. The Environment Bill is expected to bring significant change to waste management within the next few years.

**Trading hours and days:** Hours are broadly unchanged from how they have always been, however the Covid-19 pandemic has resulted in changes to how people work and shop meaning now is a good time to review them to see if any change is needed.

## 3.0 Introduction

Tower Hamlets boasts some of the most iconic and internationally renowned street markets in London. With more than 1300 market pitches, no other borough in London offers year-round trading with such a choice of vibrant and contrasting markets operating over seven days a week.

With a justifiably proud history and tradition at many of the borough's markets, the council is keen to continue its investment and support in its 10 street markets with the creation of its first Markets Improvement Plan.

Many of the markets are steeped in tradition, some going back hundreds of years. They have served as a place to visit or meet, a provider of low-cost food in the heart of communities and of specialist goods, as on Columbia Road. While the markets may hold long standing memories for many, some customers have moved away, and the borough has undergone significant change. This has resulted in low occupancy levels at some markets and a dominance of street food at others. With the introduction of the Ultra Low Emissions Zone (ULEZ) and the weekend Congestion Charge, costs are also increasing for traders leading some to question how the markets can generate a better income for them. Traders also need better facilities to improve their businesses and attract new customers.

Taking place against the backdrop of the Covid-19 pandemic and subsequent reopening in April 2021, this is a timely opportunity to reflect on the role that the council's markets play in people's lives. With the borough's markets primarily located in high streets and town centres and with many people still working from home, there is an opportunity for them to reconnect with the markets. However, pre-pandemic the markets were struggling, impacted as they were by changing shopping habits, and a reluctance to adapt to better meet shoppers' needs.

The Plan proposes a vision for our market and key priorities for the five years ahead, from 2022 – 2027. In creating individual market action plans, each market has a focused plan for improvements, subject to funding and resource, to work towards better serving their customers whilst providing traders with upgraded facilities. The markets included are shown on the map below and are all managed by the council.

The Improvement Plan excludes privately operated markets in the borough like Spitalfields Market, or those managed by the Arts, Parks & Events Service like Victoria Park Market.



The Plan considers the context in which the council's markets operate, in relation to high streets and town centres, the Covid-19 pandemic, London-wide initiatives and complementary strategies and policies within the council. It goes on to identify 10 themes on which participants commented most frequently and will have the biggest impact on the future of the markets. It also references known funding opportunities and performance metrics for how change can be monitored.

### London Borough of Tower Hamlets street market locations



## 4.0 London's high streets and markets

The Greater London authority (GLA) has published a wealth of policies and research on high streets and markets which give context to the council's market offer and operations.

### 4.1 High Streets

With more than 600 high streets and 280 markets in London, the Greater London Authority (GLA) has published research on their relationship with Londoners and visitors and emphasised the public value of the city's high streets and town centres. With two thirds of Londoners living within a five-minute walk of a high street and almost half of Londoners not leaving their local area on a daily basis, there are opportunities for high streets and the markets on or close to them to thrive<sup>1</sup>.

Guidance<sup>2</sup> identified a series of priorities and there are several where markets can play a part including:

- creating more welcoming and attractive high streets where people want to spend time - through events, public realm improvements and investment to ensure accessibility for all
- helping high street businesses to make better use of technology, refresh their marketing, and diversify their offer
- ensuring high streets are places for a diverse range of start-ups and SMEs, with plenty of affordable workspace
- supporting the formation of new organisations and groups that help London's high streets in the long-term

Markets across London have been shown to activate places, attract people to an area, support enterprise and provide a place to meet, shop and socialise. It is within this context that the improvement plan has been developed.

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1 GLA website [www.london.gov.uk/what-we-do/regeneration/high-streets/supporting-high-streets](https://www.london.gov.uk/what-we-do/regeneration/high-streets/supporting-high-streets)

2 High Streets & Town Centres - Adaptive Strategies, GLA (2019)

## 4.1 High Streets

The GLA identified further opportunities for markets to thrive by<sup>3</sup>:

- maximising their social value benefits by understanding the current markets and street trading legislation
- coordinating market services and information across councils
- ensuring clear agreements with private operators
- recognising the mutual support of markets with high streets and town centres
- improving opportunities for environmental sustainability
- helping traders play to the strengths of being independent and meeting customer requirements
- mentoring support for traders
- encouraging new trader applications
- using social media to build communities of shoppers and embracing new technologies

All these factors play a part in how the council adapts the borough's markets and street trading offer for the future, via council-run markets, and by working with other organisations who operate in the borough.



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3 Understanding London's Markets, GLA (2017)

## 4.1 High Streets

The High Streets - Adaptive Strategies guidance, as part of the Mayor of London's Good Growth by Design programme emphasises the public value of high streets and town centres. Priorities include:

- animating empty shops, disused buildings and underused outdoor spaces - through both temporary and permanent activities
- creating more welcoming and attractive high streets where people want to spend time - through events, public realm improvements and investment to ensure accessibility for all
- improving building frontages - through bold new colours, materials, imagery and signage
- increasing the delivery of new housing and jobs in town centres across London
- helping high street businesses to make better use of technology, refresh their marketing, and diversify their offer
- ensuring high streets are places for a diverse range of start-ups and SMEs, with plenty of affordable workspace
- supporting the formation of new organisations and groups that help London's high streets and can continue to do so in the long-term

### High Streets for All

This mission sets out a clear intent to work with London's diverse communities to establish new, exciting and experimental uses across London's high streets and public spaces.

The 15-Minute Cities concept aims to encourage Londoners to see the city on their doorstep with 90% of Londoners already living within 10 minutes of their local high street.

London's high streets were already struggling due to shifting consumer behaviour, the changing nature of work, dwindling local authority resources and the climate emergency and the Covid-19 pandemic has accelerated this process. Across the city, the picture is uneven. Where high streets are flourishing, start-ups can be priced out. Where high streets are struggling, the number of empty shops is increasing. This serves to make those places even less attractive to visit and invest in.



## 4.2 Markets and Street Trading

The GLA has further invested in high streets and town centres by establishing a dedicated focus on markets and street trading through research and the creation of the London Markets Board in 2017.

### 4.2.1 Understanding London's Markets

The Mayor wants markets to continue to grow and thrive, and for markets to remain a vital part of London life, bringing diverse social, cultural and economic benefits.

The report outlines opportunities for markets to thrive which include:

- Operational opportunities for local authorities include investing in a dedicated, locally known and well-resourced markets team, including where possible, a markets development officer and sharing in learning networks such as the Street Trading Benchmarking Group
- Maximising social value benefits by understanding the current legislation and working positively to reinvest a surplus back into markets
- Coordinating market services and information across councils
- Communicating a clear vision for markets within and outside the council
- Maintaining momentum when there are changes in personnel, so continuity and support continues
- Ensuring clear and well-thought-through agreements with private operators; accessing wider funding streams including through Section 106 agreements in planning and corporate social responsibility budgets
- Recognising the mutual support of markets with high streets and town centres; designing-in operational improvements such as back-to-back layouts for stalls
- Improving opportunities for environmental sustainability, and widening the affordability of the produce on offer
- Helping traders play to the strengths of being independent and meeting customer requirements
- Mentoring support for visual merchandising and promotion
- Encouraging new traders by holding open days and clearly signposting information on council websites
- Mentoring new and more diverse talent
- Using social media to build communities of shoppers and embracing new technologies.

These are baseline recommendations for how markets can adapt and thrive however each borough will have different challenges and possibly management models for their markets, meaning it is essential that changes are rooted in a local context.

This report facilitated the creation of the London Markets Board.

## 4.2 Markets and Street Trading

### 4.2.2 The London Markets Board

The London Markets Board provides a single point of governance and reporting to coordinate and focus strategic action on markets across the GLA Group and London boroughs.

The Board explores the key challenges markets face, the breadth of value they offer, and opportunities to improve their long-term sustainability and social impact.

Board members were appointed in December 2018 for the first term which ended on 5 September 2021. Applications will be open to all to create a new board from late 2021.



## 4.3 Covid-19 recovery

The Covid-19 pandemic has had a significant impact on London's markets and high streets. Tourists stayed away, and non-essential businesses and traders spent much of the period from April 2020 (and into 2021) closed. However, across the UK, many people have cited a much stronger connection with their local high street. In London many local areas have thrived while central London's recovery is proving slower.

High streets and town centres have been under pressure for some years, in part due to the increase in online shopping, but this is only part of the story. For many it is down to businesses not being able to adapt quickly enough as shopping habits and changes in taste. The pandemic has accelerated these changes; several big names in retail and hospitality have disappeared from the high street for good and it is likely more will follow.

For many years changes have been proposed for markets locally and nationally; from increasing the use of card payments to online sales platforms and offering alternative ways to access goods such as click and collect or local delivery. The pandemic has provided clear evidence for this need to adapt. Now is timely to review what shoppers want to buy and the experience they want to have at a market to see where changes are needed. While the council's markets have provided a social role during periods of isolation and continued to offer low-cost essential goods to the borough's residents, the pandemic has provided clear evidence for a need to adapt. Now is timely to review what shoppers want to buy and the experience they want to have at a market to see where changes are needed.

We expect our markets to continue to play an important role in Covid-19 recovery as low cost locations in which to start or grow a business.

Wider changes as a result of the pandemic cannot be ignored. The hospitality, arts and culture sectors have been hit hard; there have been inequalities in how young people have continued to access their education and low-income households have felt the impact most. 65% of market and street traders responding to a survey by the National Federation of Market Traders said that they had been forced to close during the pandemic period. We have seen many examples of changes to streets with more greening initiatives and ease of movement which also impact on street trading.



## 4.3 Covid-19 recovery

In our communities we experienced high levels of volunteering and on the whole improved relationships with neighbours, however businesses and market traders in the borough struggled to pay their rent and staff wages due to being closed or reduced footfall<sup>4</sup>. At our markets, fees were suspended for those unable to trade and support provided through the discretionary grants scheme.

To support the reopening of non-essential retail, in March 2021 the government announced changes in England to include extending opening hours. Alongside this, the pavement licencing process (for hospitality businesses to secure a licence to place tables and chairs on the highway) has been expedited and made cheaper for a further 12 months. In some cases, this is presenting a challenge where market pitches already use these spaces. There has also been a focus (from central government down to local authority level) on making more space available for walking and cycling. This impacted markets both in terms of stalls layout, and in the number of available pitches. Many markets have seen changes to their layout and the consultation survey asked for views specifically on Columbia Road.



Mayor John Biggs with Whitechapel Market traders.



## 4.4 Tower Hamlets complementary strategies

The Markets Improvement Plan sits within a hierarchy of strategies and policy guidance documents which can be found on the council's website. These include:

### 4.4.1 Strategic Plan 2021-24

The Strategic Plan is the main business planning document of the council and a central part of the way in which our performance is managed.

The pandemic has resulted in a financial challenge for the council in how it delivers services now and in the coming years (as well as having implications for the finances of markets) and in April 2021, Cabinet approved a revised Strategic Plan to reflect this.

The council's priorities are to:

- Ensure that people are aspirational, independent and have equal access to opportunities
- Be a borough that our residents are proud of and love to live in
- Be a dynamic, outcomes-based council using digital innovation and partnership working to respond to the changing needs of our borough

### 4.4.2 Local Plan 2031

The Local Plan, Policy D.TC7 refers to the borough's markets in that:

- Development proposals impacting existing markets will only be supported where:
  - they demonstrate that the overall quality of the market and public realm will be improved.
  - the capacity for existing numbers of pitches is maintained
  - they protect or re-provide appropriate storage and servicing facilities.
- Proposals for new markets, including farmers' markets and street food markets, will be encouraged. They will be directed to major, district or neighbourhood centres and should enhance the centre's existing offer and contribute to vitality and cohesion.
- Proposals for new markets outside of major, district or neighbourhood town centres will only be supported where they:
  - are temporary in nature
  - bring vacant sites back into use
  - do not undermine the borough's existing markets and town centres
  - do not cause unreasonable harm to the amenity of surrounding properties, particularly where evening and night-time markets are proposed.

This policy aims to protect the borough's existing markets and ensure that new development does not undermine their future role and function (by, for example, ensuring that storage facilities are maintained).

## 4.4 Tower Hamlets complementary strategies

### 4.4.3 Growth & Economic Development Plan 2018-23

This Plan aims to build an economy that works for local people and to ensure that everyone can benefit from the borough's (economic) success focusing on sustainable and inclusive growth.

The borough is one of contrasts. While some people remain on low incomes, others are within the higher income levels of the UK (as shown in the action plans in appendix II) and often residents live side-by-side making it challenging to create markets that will serve different populations from one location creating a mismatch between what is sold and what people want to buy.

It is estimated that four in 10 households live below the poverty line, after housing costs are considered, while 3% have an annual household income over £100k.

The Plan sets out how the borough's growth can benefit all; preparing young people for work, helping working age residents thrive, supporting existing businesses and securing investment.

The council's work also supports this area via:

- The Ready Programme delivered by The Enterprise Team as a suite of projects to help businesses start, grow and enter new markets
- The WorkPath service which supports people in finding jobs
- The High Streets and Town Centres team delivering projects across towns centres and markets to make them more attractive places to spend time and to grow successful businesses

## 4.4 Tower Hamlets complementary strategies

### 4.4.4 High Streets & Town Centres Strategy 2017-22

This review of the borough's key high streets considered opportunities to:

- Increase footfall
- Improve the customer experience and promote civic pride
- Attract retailers and reduce vacant units, including on street markets
- Increase local employment and support enterprise
- Improve the appeal of our high streets, including our street markets
- Improve the Evening and Night Time Economy
- Improve the management of key high streets

Within the strategy there is recognition of the role that markets play in the borough's town centres with a priority to improve the management of street markets.

While the High Streets & Town Centres Strategy contained a series of proposals for markets, to date few have been actioned and internal changes will see those recommendations replaced by the dedicated Markets Improvement Plan.

## 4.5 Tower Hamlets Markets and Street Trading Operations

Markets and street trading in London are typically managed using one of two sets of laws; The London Local Authorities Act 1990 (As amended) (LLAA/The Act) or The Food Act (Part III) 1984.

Our markets are managed under the LLAA and this will remain the case for the foreseeable future. For new markets, the council will consider whether The Food Act (Part III), 1984 offers an alternative operating framework on a case-by-case basis.

The markets in the borough managed by the council are shown below with pitch numbers based on 2020 occupancy levels preceding the Covid-19 pandemic and on reopening in 2021. Across the borough 42 markets take place every week.

Market	Operating times							Pitches			
	M	T	W	T	F	S	S	Before Covid	Occupied	Under Covid	Occupied
Bethnal Green								102	55%	42	67%
Brick Lane								60	79%	40	81%
Chrisp Street								80	58%	49	72%
Columbia Road								52	100%	47	102%
Petticoat Lane Weekday (**)								166	26%	57	40%
Petticoat Lane (Sunday)								440	32%	165	40%
Roman Road								211	58%	74	89%
Roman Road Square								28	11%	3	110%
Sclater Street**								13	37%	8	41%
Watney Market								62	67%	30	83%
Whitechapel								116	93%	82	92%
								<b>1330</b>		<b>597</b>	

(\*) Petticoat Lane weekdays includes Wentworth Street, Goulston Street and Bell Street

(\*\*) Brick Lane weekdays

(\*\*\*\*) Brick Lane Sunday market includes Sclater street and Cheshire Street

Source: LBTH Market Services



## 4.5 Tower Hamlets Markets and Street Trading Operations

### 4.5.1 The London Local Authorities Act (LLAA)

In Tower Hamlets, all street trading activity (within seven metres of the highway) is run under the LLAA and an individual needs a street trading licence either temporary or permanent to be able to trade.

The Act gives traders rights in law, dictates that no profit is to be made by the council and makes it difficult to enforce regulations without a lengthy appeals process. Although the Act was drafted to deal with licensed isolated pitches (traders on their own, not in a market) it is also applied to market traders.

The LLAA limits what the council can charge, and only reasonable costs related to the market operation can be charged back as part of the licence fee. This can include management of street trading operations, such as enforcement, street cleaning around trading, collecting and disposing of waste, and administration.

Although this restriction on making a profit has been seen as constraining councils' ability to promote and invest in markets, LLAA markets can make a surplus, which the local authority can carry forward, but which must be ringfenced for the benefit of markets and traders within the financial year. The LLAA makes it challenging for the council to:

- set realistic fees to achieve a cost neutral position
- replace traders or remove their pitch (if they are in breach of regulations)
- change what is sold at the markets
- enforce regulations and policies

Some of the feedback from the markets consultation was about aspects over which the council has no control, examples being removing Business Rates, cancelling the Ultra Low Emissions Zone (ULEZ) and suspending the Congestion Charge at weekends. These items are under the control of the government and/or the Mayor of London and the council is unable to make changes in these areas.

## 4.5 Tower Hamlets Markets and Street Trading Operations

### 4.5.1 The London Local Authorities Act (LLAA)

Other aspects over which the council has limited control in relation to markets and street trading are shown below.

What the council cannot do	Reasons why
Increase pitch fees to generate a profit	The council is only allowed to charge back costs relating to market operations and nothing else. A surplus is permitted for reinvestment in markets but not a profit.
Replace all the traders with new ones	The Act provides traders with protection in the form of their trading licence, they have their pitch for life in some cases.
Move the traders around so the stalls flow better	The trading licenses assign traders to a specific pitch, and this cannot be changed under the Act unless the trader wants to move.
Actively curate the market bringing in new traders	The Act provides traders with protection in the form of their trading licence meaning empty pitches can be filled but traders cannot be replaced unless they surrender their licence.
Run different markets every weekend	Due to the protections the Act offers traders, the council cannot give their pitch to someone else to trade on a regular basis on their designated trading day.

## 4.5 Tower Hamlets Markets and Street Trading Operations

### 4.5.2 City of London Various Powers Act 1987

Middlesex Street (Petticoat Lane Market) contains the only market stalls in the City of London and this market sits in both Tower Hamlets and the City.

Street trading in the City of London is regulated by the City Corporation under the City of London Various Powers Act 1987.

For many years street trading within the City of London was not permitted except for a Sunday market held in part of Middlesex Street. This general prohibition has now been amended by the City of London (Various Powers) Act 2013 which permits licences to be issued for street trading elsewhere in the City of London for limited periods.

With the exception of these market stalls, street trading is not permitted on any public street or place in the City of London geographical area unless a Temporary Licence under section 11A of the Act has been granted. Temporary licenses are only granted if they comply with certain terms and conditions as stated in the City Corporation's Street Trading Policy.

## 4.5 Tower Hamlets Markets and Street Trading Operations

### 4.5.3 Alternative management and trading models

In some cases, the council has started markets outside of the LLAA to allow third party operators to run markets, for example through the Arts, Parks and Events Service however, the council prefers to licence individual traders working in conjunction with the operator.

#### Victoria Park Market

The weekly produce market in Victoria Park is a good example of how the council works with market operators in spaces away from the highway where markets can operate independently of the LLAA.

The market takes place every Sunday morning selling food between 10am-4pm and hot/street food 10am-5pm. They take payment by card only and the market often features live music. They have 39,000 followers on Instagram.

Traders have to sign up to sustainability measures and the market is plastic-free.

Customers are local and mainly travel to the market on foot.

Markets set-up on non-council streets or on private land, for example the indoor markets on Brick Lane, are not subject to the Act and as such, the operators of these markets have much more flexibility in how they run their markets from recruiting traders to training, marketing and promotion and operating for profit.

In other boroughs, operating under the LLAA, flexibility has been applied (similar to Tower Hamlets) whereby market streets are licenced to third party operators to use part of the space for a market that has a different offer to the existing council-operated one or to use it on a day when the regular market does not operate to create a market aimed a different demographic.

There are currently no plans to move to The Food Act (Part Three) 1984 for existing markets, however the desire is that new markets will use it and the markets team is in discussions with the National Association of British Market Associations (NABMA) and Southwark Council (who are the main user of the Act in London) to establish exactly how this would apply in Tower Hamlets.

Appendix I provides a comparison of the two main Acts, the LLAA and The Food Act (Part III) 1984.



## 4.5 Tower Hamlets Markets and Street Trading Operations

### 4.5.4 Learnings from other boroughs

A benchmarking exercise was undertaken against five London boroughs which had individual markets broadly similar in the commodities sold, days of operation or type of location to specific markets in Tower Hamlets. More detail has been provided separately on how these markets are performing due to sensitivities around the data.

In summary, there are approaches in other boroughs which could be explored by Tower Hamlets, the main ones being:

- Creating storage units as part of a S106 agreement via planning when new developments are submitted close to market areas.
- Employing a digital marketing officer focused only on markets to create content and post regularly to social media and other channels. One borough has been approached by a local marketing agency keen to take this on for a specific market.
- Adapting market streets where occupancy is low to accommodate complementary markets to run alongside the council-managed one, either run by a private operator or in-house.
- Reviewing pitch sizes to standardise them within each market.
- In areas where demographics are changing, adapting the market to a different offer on days when the council market is not operating (via private operators or council-managed).
- Reviewing licencing policy to allow for flexibility on commodities to reduce duplication.
- Applying for third party funding for markets for example, via the Mayor of London's Good Growth Fund.

### Pitch fees

Council pitch fees are amongst the lowest in London, despite increasing in 2021. Fees previously started at £7 per day (rising to £8-9 per day with the increase) for non food weekday permanent traders.

The closest pitch fee to LBTH is for a standard stall during the week is in Zone 3 the least sought after area at Ridley Road Market (Hackney) which starts at £8. The average fee across London for a standard weekday pitch is in the late teens/early twenties (GBP).

The Royal Borough of Kensington & Chelsea has another of the lowest weekday pitch fees; for casual traders it is £13 per day (excluding Friday) and for permanent traders, if bought at a weekly rate, trading on weekdays can cost as little as £6 to £9 a day.

At the higher end, Electric Avenue Market's (Lambeth) fees are £36-37 per day and the Zone 1 section at Ridley Road Market (Hackney) is charged at a similar level.

## 4.6 The Whitechapel Road Improvement Programme (WRIP)

With the opening of Crossrail/Elizabeth Line and the relocation of the town hall to the former Royal London Hospital building planned for 2022, and several developer-led schemes coming forward in the area, Whitechapel Road is a key area of change in the borough.

The Council's Regeneration Team is delivering transformational change to a key stretch of footway at the heart of the Whitechapel District Centre between Vallance Road and New Road in the west and Cambridge Heath Road and Sidney Street to the east. In seeking to draw together existing projects there has been an expanded focus on Whitechapel Market as part of the Markets Improvement Plan for the next five years resulting in this action plan. WRIP consists of three strands of work:

- Whitechapel Road Public Realm Improvements Project (PRIP) - Upgrading the street environment so it is befitting of the municipal centre of the Borough
- Whitechapel Market Stalls Project (MSP) - Delivering a consistent stall design to improve the performance of Whitechapel Market
- Whitechapel Market Management & Maintenance Project (MMMP) - Improving the day-to-day function and management of Whitechapel Market

Whitechapel Market was part of the market's consultation with an enhanced action plan which is contained in appendix II.



## 5.0 Consultation overview

In April and May 2021, a public consultation on the council's markets was live on the Tower Hamlets website for six weeks. This was timed to overlap with the reopening of non-essential retail on 12 April, when the survey opened, closing 6-weeks later on 30 May 2021.

There were different routes/questions for three key audiences:

- Traders
- Visitors (encompassing shoppers and residents)
- Businesses on high streets local to the market locations

Each group was asked a series of questions about their shopping/trading habits and also given the chance to feedback on specific markets in their local area. Topics covered; when people went to markets, what people bought/sold there, how much they spent, what they would like to see at their markets in future and how they felt the markets impacted their lives, improved their businesses or contributed to community life.

There were additional questions for Whitechapel market traders on their ambitions for the market's infrastructure and operations, which gave insight into what facilities might be most used in future, and for Columbia Road relating to the revised layout which has been in place since the market reopened in April 2021 (post Covid-19 closure).

Participants were able to answer questions on more than one market if they had several that they use regularly, and this swelled the feedback from 680 individual responses, to a total of 1020 responses on individual markets: 715 from visitors, 168 from traders and 137 from businesses.

## 5.1 Access and promotion

The council is committed to ensuring equality of opportunity (including having a say on things that matter to them) for everyone who lives, works in or visits the borough. When carrying out engagement work, councils and other public authorities have a duty to assess and address the barriers to engagement facing groups or individuals whose voices are seldom heard.

The Equality Act 2010 asks public bodies to publish information to demonstrate compliance with the general equality duty. This includes:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and cares through association) and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Because of this legislation, we need to consider the general duty and protected characteristic groups in all of our policies, functions, practice and in our role within the community. This includes consulting for views on our services and processes. The Act requires that where participation is low for particular groups/protected characteristics, alternative methods of engagement need to be used and these factors were considered in how people could take part in the consultation. Processes were adapted at a midway point to enable easier access for some groups.

The consultation was hosted on Let's Talk, the council's online engagement platform. It was promoted via the council's mailing lists, social media and other channels. Local stakeholder organisations, large employers, educational institutions, housing associations and faith communities were also directly emailed so they could promote the survey to their respective members/teams.

1500 flyers were handed out to residents and businesses near Watney Market, Chrisp Street, Whitechapel, Bethnal Green, Brick Lane and Roman Road.

To ensure traders, who often have little 'desk time' to complete online surveys, were engaged, the council officers handed out paper copies at the markets and collected completed surveys which were then keyed in to be included in the overall results. Council officers spent 12 working days promoting the survey in markets and town centres with 250+ business and 300+ trader surveys distributed.

## 5.1 Access and promotion

The survey was also promoted via the council's Facebook and Twitter channels and newsletters as shown below.

Platform	Page type	Number of posts/ newsletters
Facebook	Council page posts	2
Facebook	Council page – paid posts	2
Twitter	Council page	4
Newsletter	Business/Town Centres	4
	Residents	2
	Bengali	2
Internal	Yammer	3
	Staff newsletter	1
	Bridge and Spotlight articles	1
	Place Directorate email	1
Stakeholders	x200 contacts	3
Email	x600 Market traders	5
WhatsApp	Market reps at all markets	multiple
Third party promotion	Aldgate Connect BID, Roman Road London, Queen Mary University London, Neighbourhood Forums	multiple

An additional consultation survey was carried out via Let's Talk on the draft Markets Improvement Plan 2022-2027 during November and December 2021 which received 75 responses. The overwhelming majority of feedback supported the proposed vision and themes to improve the council's 10 street markets and no changes were made between the draft and final version of the Markets Improvement Plan.



## 5.1 Access and promotion

The most effective methods of reaching the public held true to the consultant's experience elsewhere, despite the impact of Covid-19. For the public, direct contact via email from the local authority or a third-party stakeholder or social media posts (Facebook in this case) were the most effective. For traders and businesses, face-to-face methods (text, handing out paper surveys, reminders from market reps) were the most effective to elicit responses.

Against the backdrop of the pandemic and non-essential retail reopening, the response rate was higher than anticipated and compares favourably with responses in other boroughs which have run similar consultations.



## 5.2 Interviews and observation

Meetings were offered to a wide range of stakeholders working with or based alongside markets across the borough. It was voluntary as to whether these people or groups wished to take up the offer.

The consultants met with 14 stakeholders via online and in person meetings including market trader groups, Barts Health NHS Trust, TFL, and internal departments such as Waste, Parks and High Streets & Town Centres. These took place throughout the survey period and beyond.

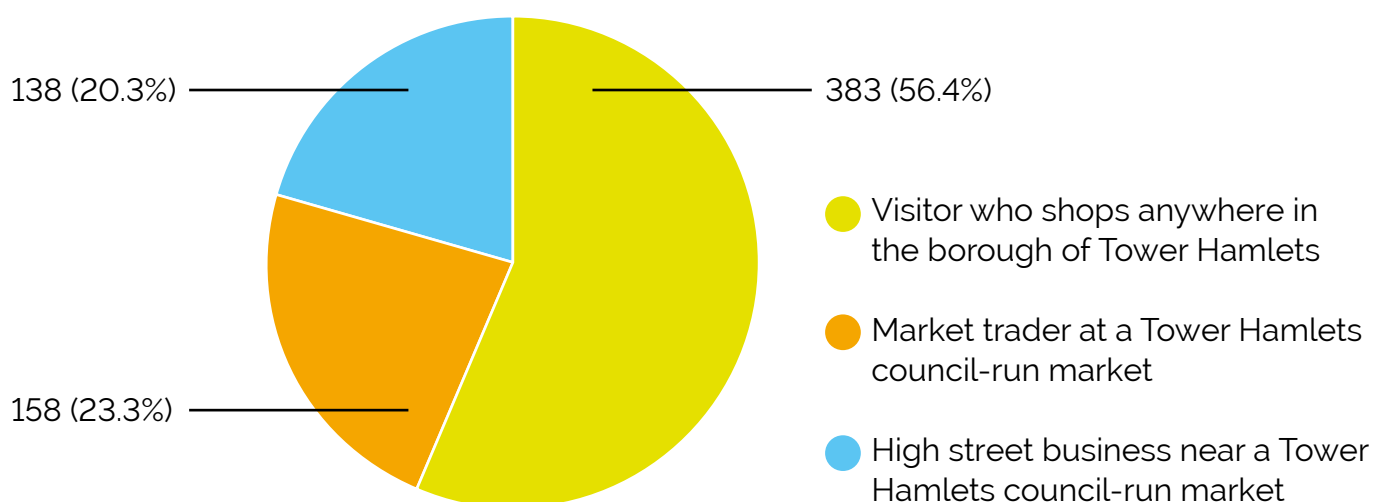
The consultants also visited each market two to three times each over the course of the project, observing the operations of the market, informally chatting to inspectors, managers, traders and customers. This also included investigating routes between the markets, understanding how they impact each other and operate as an overall offer across the borough.

## 5.3 Responses

There were 680 individual responses to the survey, with the largest proportion being attributed to shoppers which is to be expected. The response rate in each category was:

- 158 Traders (23.2% of responses and representing approximately 26% of pitches currently operating)
- 138 individuals answering on behalf of a businesses (20.3% of responses) based in postcode areas E1, E2, E3 and E14 which aligns with the locations of the markets
- 384 Shoppers (56.5% of responses) who lived primarily in postcode areas E1, E2, E3, E14 and E1W

**Are you answering this survey as a:**



Participants had strong ties to the borough with 65% of respondents being residents almost a quarter (24.9%) working in the borough and the remainder being students (2.9%) and visitors (6.6%).

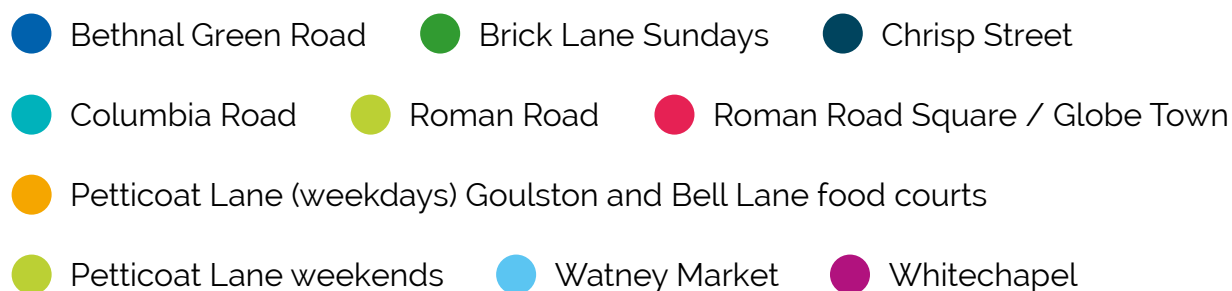
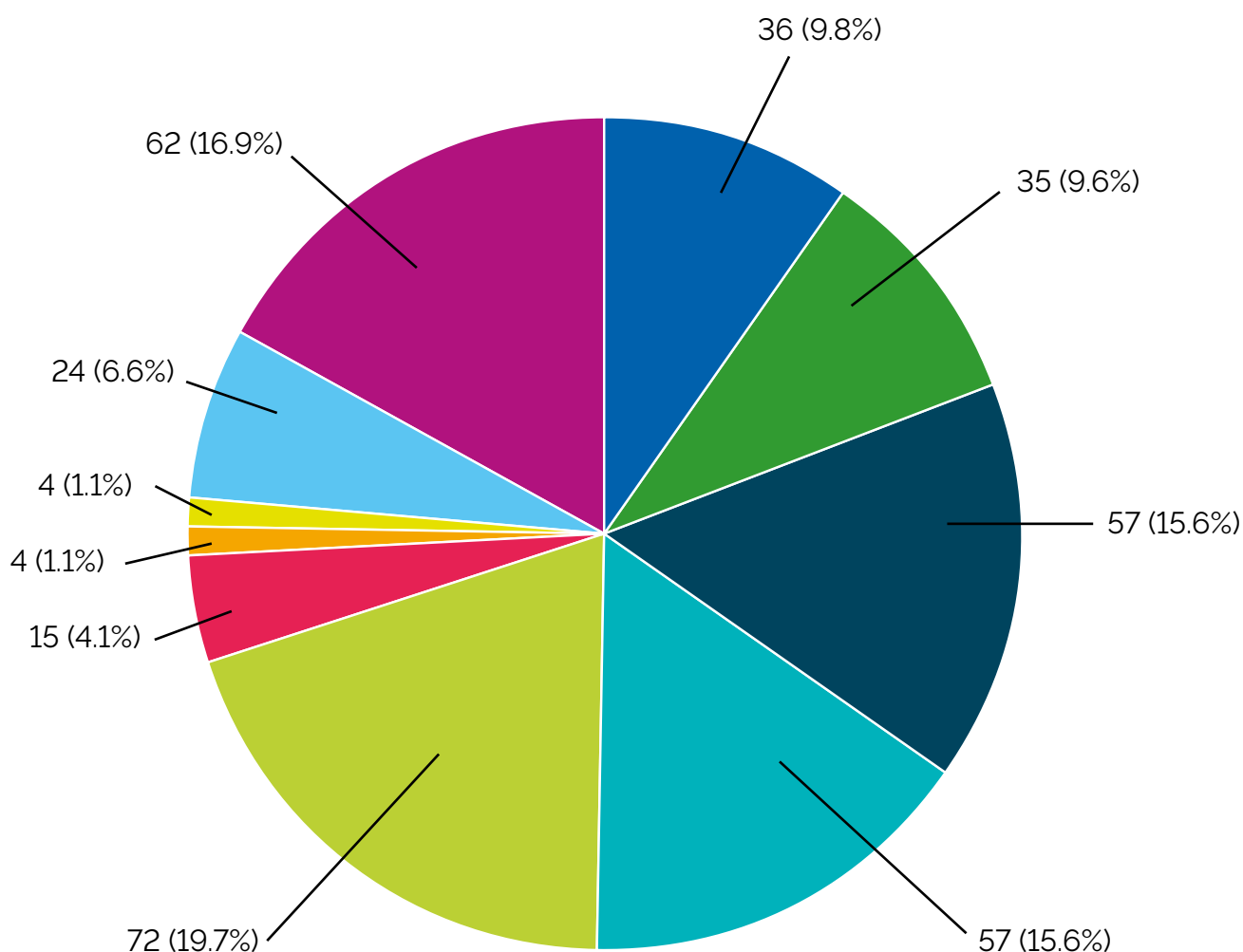
## 5.3 Responses

There were high levels of response via the council's engagement platform Let's Talk, with the maximum daily number of visitors being 244 and a total reach of 1536 visitors to the site. As Let's Talk mandates registration before completing the survey this is likely to have played a part in the variance between reach and surveys submitted. To account for this, paper copies were also distributed leading to an overall response of:

	Let's Talk (online)	Paper surveys	Totals
Residents	384	0	384
Businesses	15	123	138
Market Traders	42	116	158
<b>Total</b>	<b>441</b>	<b>239</b>	<b>680</b>

## 5.3 Responses

The highest number of shopper responses related to Roman Road Market (19.7%) followed by Columbia Road (15.6%) and Chrisp Street (15.6%). There were limited responses from Petticoat Lane Market (weekdays and weekends).





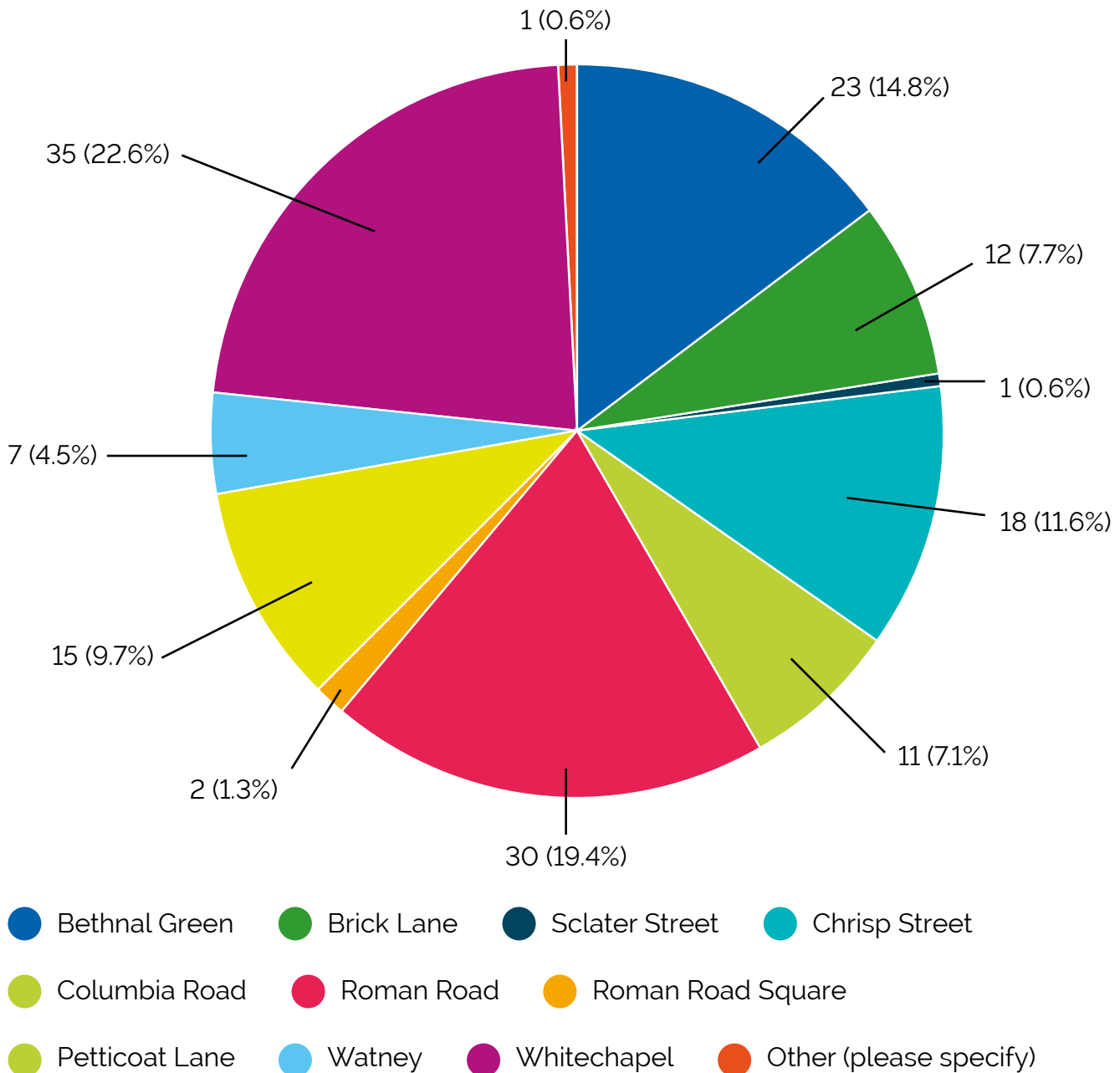
## 5.3 Responses

Respondents had the opportunity to comment on more than one market if they wished to. This resulted in 57% answering about more than one market with the majority (31.1%) choosing Columbia Road as their second market. 40% of respondents answered about more than two markets with Columbia Road and Brick Lane (Sundays) being the most popular third choices.

We were keen to hear from people that do not visit the council's markets and this group accounted for 6% of respondents. This group's comments are important in understanding the elements that deter people from using the council's markets and whether changes can be implemented to attract them.

Market Traders are often the most challenging group to reach due to their work patterns and access to technology. 158 traders represented approximately 26% of available pitches (under Covid-restrictions) and is a good return. Whitechapel Traders represented the highest number of traders from any one market at 22.6% closely followed by Roman Road (19.4%) which meant clothing/fashion traders were the highest response group by commodity. 11.4% of traders trade at more than one market and 35.1% of traders are also residents of the borough.

## 5.3 Responses



137 individuals responded on behalf of a business. 25.7% of business respondents were located close to Roman Road (25.7%), Bethnal Green (15.4%), Whitechapel (13.2%) and Columbia Road (13.2%). Just over half of the businesses (52%) were retail followed by food and beverage (23.5%). 39% had been in business at their location for 11+ years and 30% for 6-10 years. 10 businesses had opened in the past 12 months.

## 5.4 Headline results

High Streets and markets coexist side-by-side, but there is a mixed picture across the borough in terms of the relationship between the high street businesses, market traders and residents.

The least visited markets by respondents were Sclater Street and Petticoat Lane (Sundays) as opposed to Whitechapel, Bethnal Green and Crisp Street which have the highest number of people that visit them daily.

74.1% of respondents support start-up traders being given priority at council markets, while 74.6% support preference being given to residents of the borough when pitches become available.

The action plans provide more detail on the survey results in relation to individual markets (appendix II).



## 5.4 Headline results

### 5.4.1 Shoppers

Shoppers use the markets due to their location and that they offer value for money, however the quality and range (of goods) frequently scored near the bottom on reasons for visiting. The exceptions to this were Roman Road Square and Columbia Road markets, where quality goods are a draw for customers. Online reviews and images did not feature as a reason to visit, apart from low scores for Brick Lane, Columbia Road and Roman Road.

The location factor was backed up by how people travel to the market with walking being the most common option. Columbia Road, Whitechapel and Bethnal Green all had more than 20% of respondents travelling by bike. Bethnal Green had the highest number of shoppers driving there at 29%. Other markets had low numbers of shoppers driving to them.

Visitors were asked why they do not shop at council markets. More than a third cited the poor quality of goods (39%), the lack of contactless payment options (34%) and the products on offer were poor (31%) contributing to a negative market atmosphere. These factors appear to be unique to the council markets as it does not deter shoppers from visiting other markets, with 91% saying that they shop at Spitalfields as well as Victoria Park Market or the Truman Brewery markets.

**Which of these factors prevent you from shopping at these markets? Please tick all that apply:**



## 5.4 Headline results

### 5.4.1 Shoppers

For those not shopping at markets they visit supermarkets (84%) or shop online with Amazon-type retailers (79%) or online market places (52%). For 'take away' food they primarily use Deliveroo (65%) or local cafes (68%).

When looking for information on our markets, 52% of shoppers use a search engine as their primary source. Of those using social media, 37% each use Instagram and Facebook, with similar numbers using the council's website or a market website. Few shoppers would use a trader's website (meaning it is better to create one website platform for a whole market).

#### **Shoppers would like:**

- Special events - 67% felt that celebrating festivals and occasions would attract more customers to the market
- Wider availability of options to pay by contactless (57%)
- Evening markets and eco-friendly (products or operations) to increase - requested by more than a third of respondents
- More community stalls (34%)
- 31% would like new markets to be added to the existing ones with locations frequently mentioned being in Stepney and Bow, Canary Wharf and Limehouse and The Isle of Dogs.
- Higher quality products at all markets
- Wider range of goods at markets
- Cleaner market environments



## 5.4 Headline results

### 5.4.2 Traders

Traders' optimism about the future of the markets varies greatly by location. Brick Lane and Columbia Road traders were the most optimistic with 75% and 81% feeling hopeful or very hopeful. At Watney Market more than half (57%) of traders were hopeful. Traders were less positive at those markets already flagged as being at risk with 80% of traders at Petticoat Lane (Sunday) and 53% at Roman Road feeling unhelpful or very unhelpful about the future.

There was no clear view on what traders may change in the 12 months about their business. Common choices were to trade less or more often, to develop online shopping, or to trade in another borough.

How they trade:

- 34% of traders also trade via their own online shop, whilst 28% also have a physical shop and 25% also trade wholesale
- More than half of traders were not using any marketing tools (56%). Of those that were, Instagram was the most popular, closely followed by Facebook. Despite limited marketing activities 73.1% of traders did not wish to receive marketing support to help them. A similar number did not wish to have any access to business support
- 67% of traders use a van to bring their goods to market with 26% using a car and 19% walking
- Crisp Street, Petticoat Lane and Roman Road were the markets where more than 60% of traders recognised more than half of their customers implying that these markets have a regular customer base.

#### Traders would like:

- Parking and access to storage and toilets as well as the market environment to be improved.
- The ability to take card payments scored highly across the board, though this was not the most important issue at any specific market.
- 73% of traders would like to see waste separated for recycling whilst 29% would like plastic free stalls.

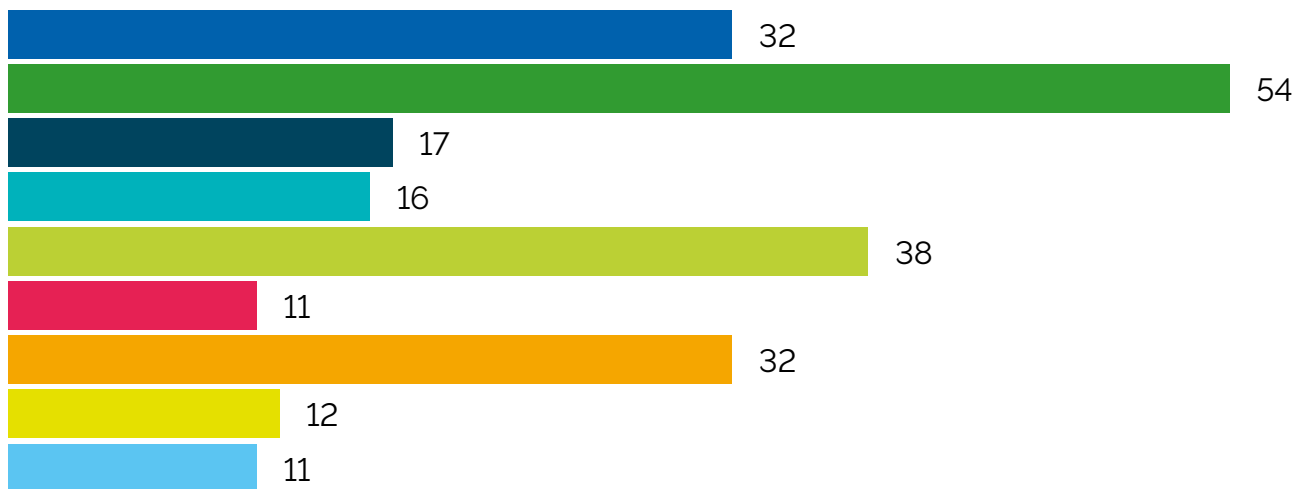
## 5.4 Headline results

### 5.4.3 Businesses

75% of business respondents buy goods from the market near them. They most commonly buy fresh food (fruit and vegetables, meat, fish, bakery) and clothing. At a similar level of purchase was street food, jewellery, flowers/plants and household goods. They shop at the market as it offers value for money (71%), is in a convenient location (62%) and has high community value (44%), however quality of products is chosen by less than a third of respondents.

Similar to shoppers, businesses are deterred from shopping at the markets due to the quality of products (55%), being unable to pay by card (39%) and the general market environment (33%)

**Which factors would prevent you from shopping in these markets? Please tick all that apply:**



- Products on offer
  Quality of products
  Their locations
- Opening days/times
  Being unable to pay by card
- You don't know what they sell
  General market environment
- Takes too long to shop there
  An online presence for each market

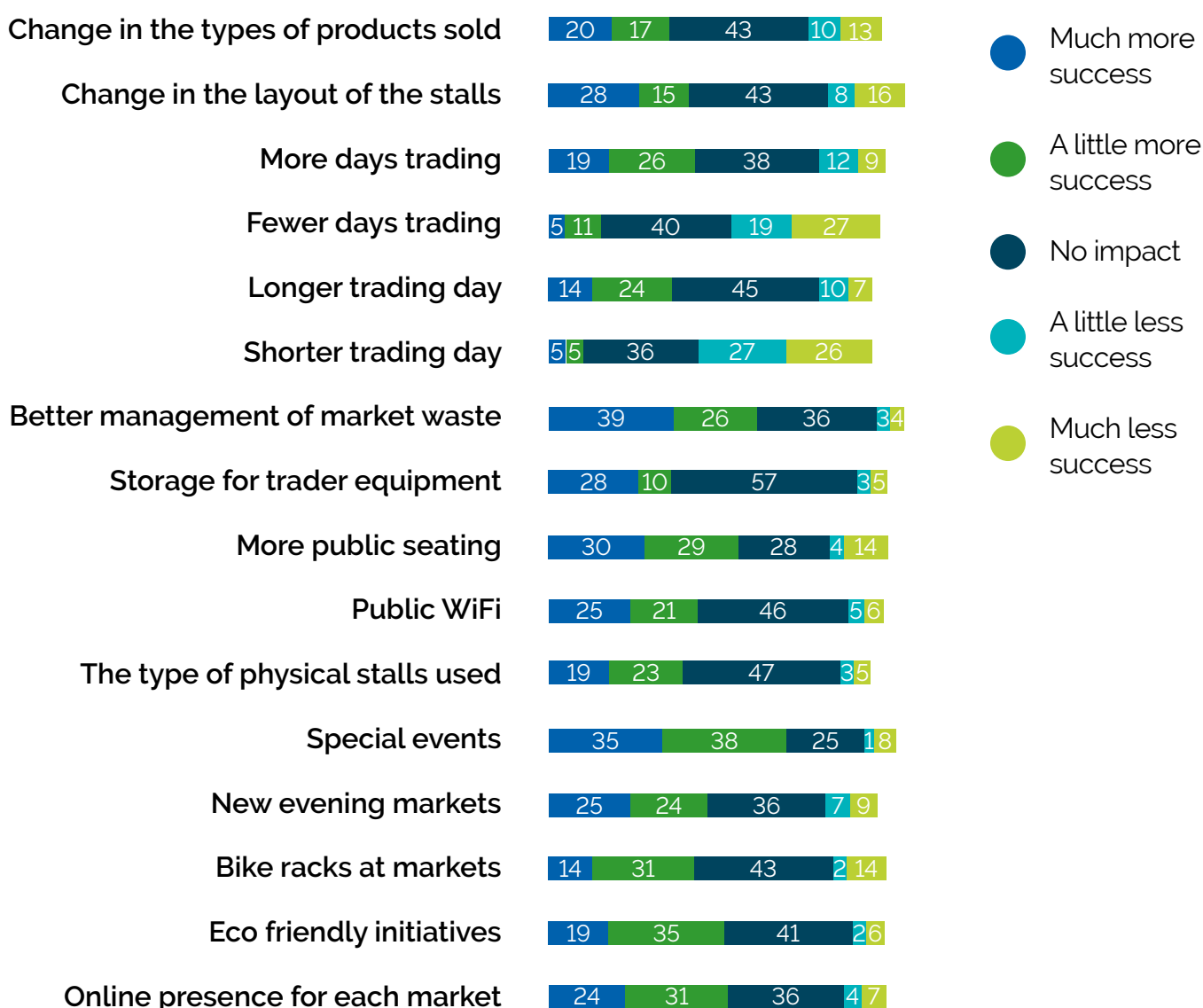
## 5.4 Headline results

### 5.4.3 Businesses

Businesses would like:

- Better management of waste – 39%
- More public seating – 30%
- Special events at markets – 35%
- Eco-friendly initiatives – 19%
- Online presence for each market – 24%

**Would any of the following changes to these markets / market streets impact on the success of your business?**



Detailed findings for all markets can be found in appendix III.

# 5.5 Equalities Profile

## 5.5.1 Survey Responders

A detailed equalities analysis is included in Appendix IV.

The equalities profile of the survey responders and the borough profile broadly align. There are strong trends in the ethnicity, religion or philosophical belief of responders that match the borough profile.

There are however, two notable anomalies. The gender of market traders is overwhelmingly male, but the gender of shoppers includes a much greater proportion of female than male responders (approximately 100) that gives a majority of female responders overall.

Total responses:



### Market trader responses:



## 5.5 Equalities Profile

### 5.5.1 Survey Responders

The other anomaly is the sexual orientation of survey responders. Experimental estimates published by ONS for 2017, show that nationally 2% of the UK population aged 16 and over identify as LGB, regionally, people in London (2.6%) are more likely to identify as LGB. Local authority level sexual identify experimental estimates published for 2013-15 estimate that 4.3% of the Tower Hamlets population identified as lesbian, gay or bisexual.

The graph below shows that a higher proportion of survey responders identify as Gay/ Lesbian and Bisexual than the experimental estimates published previously.



### 5.5.2 Survey Responder Trends

The number of survey responders answering each equality question ranges from around 100 to 600, from a maximum total of 680. The range in sample size, coupled with questions with multiple answers in the surveys means the results do not lend themselves to detailed analysis. It is not possible to identify trends in the responses from people with different equalities background, and if they do exist, they do not show in the data collected.



## 6.0 A plan for our markets

The markets covered by the Improvement Plan are shown below and appendix II contains action plans for each.

- Bethnal Green
- Brick Lane (including Sclater Street)
- Chrisp Street
- Columbia Road
- Goulston Street (Petticoat Lane action plan)
- Petticoat Lane (including Goulston Street)
- Roman Road
- Roman Road Square/Globe Town
- Sclater Street (Brick Lane action plan)
- Watney Market
- Whitechapel



## 6.1 Challenges and opportunities

Tower Hamlets, in tandem with other boroughs, has experienced a great deal of change in the past 20 years from infrastructure to population change and household income. There is more detail on how these changes have impacted individual markets in their action plans (appendix II).

From the consultation it is clear that while these area changes have taken place the markets have stood still. On the whole they sell the same products they always have, open on the same days, and are set-up/arranged in the same way. While this would be acceptable if the markets were trading successfully, eight markets have occupancy levels below 60% and only Columbia Road is full although Whitechapel and Brick Lane are also at good levels of occupancy at 93% and 79%.

The greatest challenges are:

- Low occupancy levels at most locations.
- The disconnect between the goods sold and what shoppers want to buy.
- Poor quality goods and a limited range mean the markets appear to cater to a narrow demographic in some cases. Even those shoppers that use the markets say that the quality and range is poor, and they are shopping there mainly based on location/convenience.
- The markets are perceived to have a negative impact on their high street and town centre locations, and whilst it is recognised by businesses that they bring footfall they also bring mess, increased waste and disruption to these neighbourhoods.
- The goods sold often duplicate what is already available in the area or that can be bought online for less, providing few reasons to visit the markets.
- Roman Road and Petticoat Lane (Sundays) have the highest levels of regular customers (based on traders recognising them) however these are markets at risk implying that these loyal customers are not in great enough numbers to sustain the markets and that new customers are not appearing.
- Traders' optimism about the future varies by market but they have few ideas of adaptations that can be made to make the markets more successful.
- There appear to be few policies, and therefore little enforcement, in relation to how stalls should be set-up and the market environment managed.
- With some markets located in the city fringe area consideration needs to be given to the return of office workers and the pace at which this happens. The same also applies for those markets which rely on tourists. With many pandemic restrictions lifted in England on 19 July 2021, it will take time for people, workplaces and shopping patterns to adjust.
- There are generally low skills amongst traders in relation to stock display, marketing and customer service.

## 6.1 Challenges and opportunities

However, there are also wide-ranging opportunities which include:

- Many people continue to work from home opening up the markets to a new customer base.
- New office and residential developments taking place in areas bordering Brick Lane and Whitechapel in particular, leading to increased footfall and the possibility of creating alternative eating and shopping offers to the larger, more homogenised offers.
- Our markets are located on high streets and in town centres and often close to Ideas Stores creating footfall.
- An increased interest in market trading is being seen in other boroughs with a rise in applications and this should open up more interesting commodity options, although it needs to be managed in the context of policy.
- New markets in the east of the borough due to existing markets being located mainly in the west.
- Large housing schemes are being developed in Whitechapel and Chrisp Street specifically providing an opportunity to consider any impact on the resident mix and how new commodities might better serve the community.
- The markets playing an important part in Covid-19 recovery as places to start or grow a business
- The Environment Bill is expected to bring significant change to waste management within the next few years which may increase the pace of change at our markets.

## 6.2 Changes in progress

Section 8.0 provides an overview of funding secured to date which has led to some projects already being commissioned. The main ones secured are:

- Creating an online presence for the markets
- Petticoat Lane changes under Heritage Action Zone funding
- Unlocking Your Place Potential visit from the High Streets Task Force
- Roman Road Square renewal project
- A market's newsletter

In 2020, the Markets Service held the first new council market in the borough in decades. The White Post Lane Seasonal Makers' Market took place on the last weekend before Christmas (18-20 December) in partnership with Hackney Wick and Fish Island Enterprise Zone. 25 traders and two charitable enterprises took part in the market with almost 2,500 visitors over two days. The market was funded by Section 106 money and local sponsorship. With positive feedback from traders and visitors the Markets Service will build on this experience when considering new markets in the borough under the Improvement Plan.



## 7.0 What we will do - proposals

The wide ranging proposals below sit across all markets as opposed to being applied to individual ones and the phasing of these will be dependent on funding and resources identified in section 8.0.

Each market has its own action plan which contains proposals for that market in three phases which will be subject to change based on the pressures on individual markets, funding and resource.

With some markets, for example Petticoat Lane (Sunday) and Roman Road change is more urgent as these markets are at risk of irreversible decline. Other markets are operating in areas undergoing change and as such many of the proposals will need to be in the earlier phases of the five-year plan rather than risking further decline in pushing these to years four and five.

Proposals are themed by the priorities in section 6.0





## 7.1 Business support and enterprise

The council will create a light-touch informal programme to attract start-up businesses and borough residents to market trading. This should link to work carried out by the Enterprise and Town Centre teams and pricing could be adapted to attract different types of traders.

The consultation conveyed traders' reluctance to training yet they are not actively developing their business. In the past there has been a low take-up from market traders for training however with more ways to access training than before, for example online, live and catch-up video, mobile apps and in-person it is hoped that traders will take up the opportunity in a way that will work for them.

To make this relevant, it is vital to establish key topics in which traders could receive training. These should include, display of goods (particularly clothes), pricing, customer service and taking card payments. Funding has been identified for this work with a target of 30 traders. With trader's reluctance to access training a range of delivery methods will be needed to find one that increases take-up.

## 7.2 Commodities

The council will revise the existing commodities policy to ensure it more accurately reflects each market and in consideration of the one pitch away non-compete rule already in place.

A new or revised commodities policy should identify those goods that are requested at each market and run a proactive campaign to attract new applications for them. It should also take into account existing traders as to whether they are able to or want to change their existing commodities to suit those that shoppers are requesting.

Quality and Trading Standards need to be referenced in these policies if the quality of goods is to be raised and attract more customers. The trader onboarding or licencing application process should also be reviewed to allow for checks on quality and suitability of goods before licences are issued.

With occupancy levels very low in some markets there is the opportunity to add new commodities whilst also retaining existing traders.

Commodities should also complement businesses by the markets and not compete by selling the same products.

## 7.3 Enforcement and regulation

Enforcement should be a last resort as it does not help to build relationships between the Markets Office and Traders however it appears that there is little enforcement in place which has led to market environments declining.

When traders receive their licence, the council's Markets and Street Trading Office should provide traders with a clear guide to trading at the market where they trade to include what is expected of them and what they can expect from the markets team in terms of support, facilities and contacts in the form of a trader handbook. This should include the pitch size (to remove oversizing), arrangements for waste, display of prices, stock storage, parking and so forth to improve the look and feel of the markets. Existing traders should also be issued with this handbook to raise standards and to improve the experience for customers.

## 7.4 Marketing

The consultation showed that even though traders were not undertaking marketing for their business, and few had social media they also weren't interested in having training either so there needs to be a light touch approach to signposting help in this area. It could be overcome by developing social media/online platforms for all of the council's markets. The Communications Team are already posting on social media channels however this has limited impact as it is not tailored to individual markets.

The consultation demonstrated that people would like to find out more about the council's markets online and funding has been identified for the recruitment of a Digital Marketing Officer. This role will support a project to create websites and social media channels for each market. We will be developing individual brands for each Market distinctive to their own character with each individual brand brought recognised as being in Tower Hamlets by the additional use of the TH\_IS branding. Targets to evaluate this project are included in section 9.0.

## 7.5 Operations

Traders' facilities are in many ways on a par with those in other boroughs however this does not mean that they are acceptable.

Facilities needs to be identified for toilets (these could be by arrangement with a building/business or temporary), power, drainage and lighting. There needs to be a phased programme for these which links to identified funding.

There is a desire to reduce vehicle journeys however this is at a different stage for each market. In the interim period, a list of business parking bays available in each market location should be compiled and shared with traders.

The Whitechapel Market survey asked traders for their views on storage facilities and collated data on their loading and unloading patterns and operational set-up. These are reported in the Whitechapel Market Action Plan (appendix II), but it is to be expected that these findings will be of relevance to other locations.

There is much frustration between businesses and the council's Waste Team as to the waste that the markets generate (or perceived waste in some cases). There are some initiatives already underway at Watney Market and if these go well they should be trialled in other locations too (see section 7.9)

Customers want more opportunities to pay by card and traders need improved WiFi connectivity to offer this as many said that the card readers are now low cost. WiFi access needs to be built into the long-term upgrade of market facilities.

## 7.6 Partnerships

At some markets relationships are fraught between high street businesses and the market (as an entity rather than necessarily individual traders). In most of the market locations there are existing groups who support the local high street and want to see it thrive. Market traders should be encouraged to join these networks.

## 7.7 Place

The change of layout at Columbia Road has been successful and one-way layouts have been in place at Watney Market and Chrisp Street as part of the Covid-19 recovery plans. These layouts should be reviewed as restrictions continue to ease as to what will work best in future and whether there is an alternative layout which hasn't been tried yet where there is the opportunity to do this.

## 7.8 Programming

Events feature heavily in comments on most of the markets be it special events or celebrating occasions. At some markets such as Petticoat Lane they are also closely associated with busking and entertainment and this would attract new customers during a period of change (around commodities, opening hours etc). This will need programming and for the events not to be spread too thinly. Consideration should be given to adding temporary stalls which would generate income for the council and attract new customers to the event.

There may be funding available to undertake programming at some markets. Petticoat Lane, Chrisp Street and Roman Road and Roman Road Square would all benefit from programmes activity to create more reasons to visit.

## 7.9 Sustainability

In existing policies and strategies, it is clear that sustainability is important. Tower Hamlets Transport Strategy sets out a vision for travel in Tower Hamlets from 2020-41 through sustainable means of transport, to which end the council has installed 120 charging points for electric vehicles. The borough also launched the Liveable Streets programme which aims to improve the look and feel of public spaces in neighbourhoods across the borough, with the aim to make it easier, safer and more convenient to get around by foot, bike and public transport.

The Town Centre's Strategy includes the following improvements to high streets relevant to traders whilst supporting the council's waste strategy and improving the borough's recycling rate. Proposal include:

Completed or in progress	Pending
On Brick Lane a free waste cooking oil collection service is being promoted among restaurants with a storage container in Truman Brewery.	The Aldgate Partnership BID is helping to identify where their members have capacity to host waste and recycling containers to support street cleansing.
Watney Market service yards improvements will include containers for waste recycling and help improve recycling on the market.	Middlesex Street has some privately owned yards where waste is stored which may also help manage waste and recycling on the street market.

However, the survey data shows that very few traders think that introducing eco initiatives will increase the income to their businesses however without changes to waste management, costs will increase which will be passed onto traders.

At a time when several of these markets are also considered 'at risk', and in addition to the severe negative impact of covid 19 on most traders, pushing a sustainability agenda which can often be initially expensive for businesses, feels like a hard sell. In terms of transport there are barriers for traders to move to low emission/electric vehicles to transport their stock, and the ULEZ charge is often mentioned by traders as a challenge to continuing their business. In many areas, markets

## 7.9 Sustainability

Overwhelmingly customers are keen on seeing more sustainable options from their markets. In the survey, when asked what factors would encourage shoppers to visit a market, 'eco initiatives' was the fourth highest selection, after contactless card payments, special events and new evening markets.

In addition, The Environment Bill is expected to bring significant change to waste management within the next few years. Market waste, as with commercial waste from businesses, will be impacted by the Government's proposals for Extended Producer Responsibility on packaging waste and recycling consistency.

The full extent of the implications are not yet known but is likely to include the requirement for separate food waste collection and possibly some further segregation of dry recyclable materials presenting challenges on storage space and proper management of the waste being segregated for recycling to ensure there is no contamination.

In terms of markets and the environment, issues tend to fall into a few key categories:

- Commodities
- Programming
- Single use plastic/zero waste
- Recycling
- Infrastructure - water points, bike racks
- Transport

The plan identifies key markets where eco initiatives can be a part of their action plans. This is owing to either gratuitous anti-sustainability practices which must be addressed more urgently, or to an identifiable appetite from traders to move in this direction. There is a need to address the culture of market operations in order to reduce the environmental impact of markets. The markets are very much behind the times in this area and so more generally speaking all markets should be aiming for the following improvements in the next five years, with incremental improvements along that timeline:

**Removal of single use plastic at all markets;** including specifically:

- Environmentally friendly and/or reusable food containers for street food or schemes to 'bring your own'
- Removal of plastic bags given out to customers, campaigns to 'bring your own bag'
- Removal of plastic wrapping on products, particularly produce and clothes
- No plastic in transport packaging - all this packaging to be taken away and reused by traders.



## 7.9 Sustainability

### **More low impact commodities**

- Commodities policies to take into consideration the environmental impact of new traders and ensure an increasing level of 'green traders'
- Consider awarding traders with green rating against five key targets, this also gives a speedy way to communicate the improvements to the public. These targets could include:
  - plastic free (product and packaging)
  - locally sourced (no air miles for products)
  - ethically made (no sweatshop/badly paid workers) - this is the hardest to evidence
  - low emissions (travel by public transport/on foot/electric vehicle)
  - end of life plan for product (needs to sound less morbid - but the idea that the product is either consumed/compostable/returnable/recyclable etc when you have finished with it - and that this is promoted by the stallholder)

With alternative options being:

- London Living wage employer - instead of ethically made if that is a problem, though if traders' stock is made overseas using cheap labour, even if they don't control that process, they are still not exactly a living wage business.
- Low waste - instead of plastic if this is going to be problematic with a measure of how little waste is low waste, about the business reusing/recycling /composting etc overall rather than their products

### **Support for existing traders:**

- Training from organisations like Surfers Against Sewage (operating as 'plastic free communities' in non coastal towns) for ways to improve green ratings
- Support traders' associations to manage communal bulk purchases of compostable items required for service to keep costs low
- Improve/provide traders storage to reduce the need for vehicle journeys
- Provide information on small business grants/loans to assist with green improvements

### **Increase meaningful recycling:**

- Ensure borough wide recycling initiatives can be adapted for traders
- Work with waste team to introduce recycling collections for traders' waste, and ensure traders understand what can and should be recycled.

As special events are the most requested thing at almost every market by traders, businesses and the public, add an environmentally friendly strand to every event, for example advice on recycling/reuse, bike marking and upcycling events (and repair café)

Ensure that council-run and private markets in the borough work to the same green targets. Currently private markets have more stringent guidelines and a more amenable trader pool.

## 7.10 Trading hours and days

Market traders and businesses in some locations were keen to see evening markets or extended hours. This should be consulted on further to form a trial basis on which hours can change. Action plans show which markets this is most appropriate to.

As office worker numbers increase close to the city-based markets, hours and days should be reviewed in line with any emerging changes in work or commuting patterns.



## 8.0 Funding and support

The Markets Improvement Plan is dependent on funding already in place or which may be secured in future and as such the timescales may change from those proposed. To date, several funding programmes have been announced by both the government and the GLA as well as there being the opportunity within the council to bid for funding for specific projects. The key funds are detailed in the following sections.

### 8.1 Reopening the High Street Safely and The Welcome Back Fund

In May 2020, the Ministry of Housing, Communities & Local Government (MHCLG) announced the Reopening of the High Street Safely Fund.

An initial fund of £50m was due to be spent by March 2021 however as the pandemic continued the funding was extended to March 2022 (and renamed The Welcome Back Fund (WBF) with the ways in which it could be spent expanded to help councils boost tourism, improve green spaces and provide more outdoor seating areas, markets and food stall pop-ups.

Government guidance confirms that the WBF will continue to support the four main types of existing RHSSF activities as outlined in the original guidance including:

- Support to develop an action plan for safe reopening of local economies
- Communications and public information
- Business-facing awareness raising activities
- Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.

Tower Hamlets was awarded £292,962 from this fund to cover all high streets in the borough.

## 8.2 Covid Recovery Fund

**Moving Markets Online** - £110k for building individual websites, brands and social media for each market with money for content and digital managers (Kickstart scheme) for 18 months

**Trader training** – £40k to develop a training scheme for new traders utilising council resource and kickstart scheme with a target of 30 new traders

## 8.3 Funding for specific markets

Funding and initiatives to be applied to specific markets include:

### 8.3.1 Whitechapel Market

#### High Streets Task Force

Tower Hamlets Council has been nominated to take part in the government's High Street Task Force programme. The Task Force provides support to local leaders in town centres and high streets in England. This support includes expert advice, training and data delivered directly to local stakeholders in towns and cities and a range of resources online that are available to all.

The council's support will start with an 'Unlocking Your Place Potential' (UYPP) session which via an in-person or virtual visit will identify key barriers to the improvement of an area high street and recommend a strategic response that involves further assistance from the High Streets Task Force.

The council chose Whitechapel Road as the location for this support and the UYPP session took place on 22 July 2021. The session supported the development of the Whitechapel Regeneration programme building on existing and emerging plans and relevant outputs have been incorporated into the Whitechapel Improvement Plan.

### 8.3.2 CIL and The Levelling up Fund

There are several potential funding opportunities for Whitechapel Road at differing stages of application.

These are the Community Infrastructure Levy (CIL) which allocated £1.87m to Phase One of the Whitechapel Improvement Project as part of the Capital Programme following cabinet approval in January 2021. When outputs are confirmed for future phases, these will be brought forward for funding.

An application was submitted to the Levelling Up Fund in June 2021 which is awaiting a decision.



## 8.3 Funding for specific markets

### 8.3.3 Petticoat Lane Market - High Streets Heritage Action Zones

The £95 million government-funded High Streets Heritage Action Zone programme, which is being delivered by Historic England, will unlock the potential of high streets across England, fuelling economic, social and cultural recovery and breathe new life into it for future generations.

68 high streets have been offered funding to give them a new lease of life. The lead partners in each place (mostly local authorities) are working with Historic England to develop and deliver schemes that will transform and restore disused and dilapidated buildings into new homes, shops, workplaces and community spaces, restoring local historic character and improving public realm.

Wentworth Street within the Petticoat Lane Market area, has been awarded £600,000 to restore shop fronts and facades; explore how upper floors buildings can be reused; provide maintenance training for building owners and to restore the Victorian public toilets at Leyden Street.





## 8.3 Funding for specific markets

### 8.3.4 Watney Market

£100k funding awarded for stalls, storage and waste initiatives – a multi-purpose project to improve the aesthetics, safety and the waste operations at the market

£30k for improvements to the trader's toilets – following damage and the eviction of squatters funding has been secured to improve the appearance of these facilities and help support their ongoing maintenance

### 8.3.5 Roman Road Square

Funding has been secured by the council's town centres team to improve the square. The project includes public realm improvements (wayfinding, planters, artwork), relaunching the market square (lighting, planting, seating and power points), replacing shutters on shops and creating new workspace. It will create a new walking route for 15,000 staff and students on the Queen Mary University London campus by opening up a railway arch.

For the market, plans include waste management solutions with bin stores, community events, power for traders and seating. It is hoped that these changes will also attract new traders. Work is expected to start in summer 2021.



## 8.3 Funding for specific markets

### 8.3.6 General

**Street Food Box** – £34k - a green initiative has been approved to promote re-useable food containers by consumers at our food courts. A programme of supplying and selling a new reuseable Street Food Box at a subsidised price will aim to reduce the level of single use food containers used and wasted on our streets. It will also carry the new TH\_IS brand identities created by the Moving Markets Online project funded by the Mayor's Covid Recovery Fund.

**Meanwhile Waste Storage Solutions/New Markets Waste Process** - £45k – as part of the Outbreak Control Fund the Markets Team have secured a funding to introduce a series of innovative meanwhile waste storage units at a number of our markets as part of a wider restructure of the waste operations. These units will help consolidate market waste to a single point for Waste Services collection, and help separate market produced waste from fly-tipping.

**EV/Trader Bollards** - £430k – as part of the wider council commitment to deliver electric vehicle charge point access across the borough, the Market Services team have proposed introducing circa 50 new dual purpose bollards in Petticoat Lane and on Brick Lane. These can be used by EVs during the non-trading times and then also as power source for traders on trading days.

**Equality in Action** – Market Services are working with Stitches in Time, a charity that supports economically inactive women into work, so after training and support they can make and sell food on our Markets. Market Services are also working with the GLA's Tomorrow's Market 2.0 team on another more general programme training the new generation of market traders and providing them with the tools to monetise and bring their business ideas to life.

**Accessible IT System** – Market Services recognise that access to Markets and Business Licences should be more accessible. Market Services have secured funding from and are working with to implement a new web based IT System that will make our Markets more accessible. It will streamline new trader applications and empower traders who will have full access to their online account, being able to update their details. Traders will also be able to book casual pitches and make all payments online. In addition to this we will also look to make the Market website clearer and more customer friendly.

## 9.0 Evaluation and Performance Monitoring

Performance monitoring requirements will change over time as markets adapt and elements of the plan are finalised and programmed. The metrics overview below is a starting point when considering which elements will be measured to track the pace of changes in the market's operation and long-term plan to monitor progress.

Indicator	Description	How to measure	Unit	Further notes and definitions
Increase in footfall	Footfall count repeated on the same day/period of year/occasion or ongoing if from cameras	Survey/ observation/ footfall cameras/ counters at entrance to market	Number / per cent of users	Needs to be specific to the market area given many of the borough's markets are on high street or close to transport which show people in the area as opposed to market shoppers. Observation methods need to include range of times of day
Number of pitches	Per market number of available pitches an occupancy by market day	Count of available pitches (internal systems)	Number / per cent of users	If a decision is made to increase the number of pitches in the borough, this should also be monitored
Commodities	Number of new commodities added by market, quarterly count	New traders or change in commodity applications (internal systems)	Number of	

## 9.0 Evaluation and Performance Monitoring

Indicator	Description	How to measure	Unit	Further notes and definitions
Occupancy levels	Number of vacant stalls over a period of time based on traders per market, per day	Observation via Market Inspectors and/or internal systems	Number / per cent of users	Occupancy levels vary by day. There may be days when pitch numbers need to increase and others when the market is full
Social media metrics and coverage	New channels created and active for those markets which would benefit from them	Social media observations – followers, posts, sharing	Number / per cent	How the channels are managed can be measured to root these in the markets or community
Waste	Increase in recycling levels	Via Waste Services	Per cent	A waste audit is needed to establish baseline metrics. Food waste recycling should also be considered
Plastic use	Reduction in plastic use	By observation and audit of traders	Per cent	A waste audit is needed to establish baseline metrics. Key reduction measures – number of blue plastic bag issued and shrink-wrapped fruit and vegetables. This should also monitor on street waste such as hangers and polythene covers from clothing stalls.

## 9.0 Evaluation and Performance Monitoring

Indicator	Description	How to measure	Unit	Further notes and definitions
Enterprise	Number of traders / businesses accessing support	Traders referred to the Enterprise Team, reporting upturn income or creating new income streams via survey questions annually (WhatsApp or email)	Number	Training for traders or start-ups encouraged into markets
Enforcement	Number of enforcement notices issued	Internal systems	Number	Reduced need for licensing enforcement
Income generated per financial year	Year-on-year tracking	Internal systems	Number / per cent	Surplus (not profit) generated for investment
Expenditure per financial year	Year-on-year tracking	Internal systems	Number / per cent	Impact of recycling, enforcement, and other measures on operational cost

# Appendices

- I. **Legislation comparison**
- II. **Action plans by market**
- III. **Consultation summary by market**
- IV. **Equalities Impact Analysis**

## Appendix I: Legislation comparison

London's Markets are typically run using one of two acts the London Local Authorities Act 1990 (As Amended) and Part III Food Act 1984 (FA), there are also a small number operating under Charters. The two Acts are very different with both having limitations.

The chart below compares the LLLA and the Food Act in respect to operating Markets.

Activities	Food act	London Local Authority Act 1990
Power to operate a market	The Food Act gives specific powers to establish a market which carries with it certain rights and responsibilities.	The Legislation is essentially concerned with street trading and while the street trading can result in the appearance of a market, it does not provide the licensing authority with the same level of rights as enjoyed under the Food Act.
Letting arrangements	The Food Act enables a local authority or other operator licensed by the local authority to determine its own letting arrangements which can be varied depending on local circumstances.	The London Local Authority Act largely prescribes the procedures to be followed in the various sections providing the way in which applications are dealt with, conditions in respect of licenses and appeals procedures.
Charges	The Food Act enables a local authority to fix its own charges, and these can be determined depending on a range of different circumstances. The local authority is entitled to charge a commercial rate if appropriate.	The London Local Authority Act provides that charges must reflect the cost of providing the service with legislation setting out what might be included in the charges implemented.



## Appendices

Activities	Food act	London Local Authority Act 1990
Location	The Food Act provides for the establishment of the market, but it is necessary before the market can be set up for other legal requirements to be met. This means that any highway or planning issues need to be resolved before the market can be established.	The London Local Authority Act enables streets to be designated where trading can take place. Once a street has been designated there is no need for any further action to be taken so the highways and planning requirements do not apply here.
Market Rights	The Food Act enables a local authority or other operator to control or license other markets held within 2 / 3 miles of the local authority market. This is a very important issue for many market authorities and has resulted in many authorities controlling the number and quality of car boot sales and markets in their area.	The London Local Authority Act does not carry with it any market rights as it is essentially concerned with street trading and therefore any control over car boot sales and markets has to be done by alternative means. In London there is legislation dealing with occasional sales so there is some degree of control.
Regulation of markets	The Food Act contains a series of provisions enabling the local authority to fix the dates of the market, the hours when the market will operate, and enables by-laws and regulations to be made. All these provisions are subject to local determination enabling the local authority to adapt to its own requirements.	The London Local Authority Act prescribes the way in which the regulation of street trading will be organised by providing specific provisions within the detailed legislation.

## Appendices

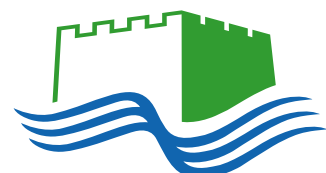
Activities	Food act	London Local Authority Act 1990
Traders' rights	The Food Act does not contain any specific provisions relating to traders' rights and these have to be introduced separately by the local authority. They are normally introduced by way of disciplinary procedures akin to the procedures followed by organisations when disciplining staff.	The London Local Authority Act sets out specifically the rights of traders who are licensed under the legislation and there is a laid down procedure that has to be followed. The London Legislation gives traders significant protection and overcoming this protection is likely to be one of the main obstacles in a transition to the Food Act.
Overall	The Food Act provides much more local control and importantly gives a market authority the right to control other markets and car boot sales within 62/3 miles. Additionally, it enables a local authority to fix charges and make a profit and that profit can be used for any purpose. Importantly, the Food Act also enables a local authority to pass control of the market to a private operator or third party.	The London Local Authority Act is essentially concerned with street trading and not markets and has limitations with regard to the charging regime and also limits licensing by preventing the responsibility being transferred to a private operator or third party. The benefits reside in designating streets for trading purposes and also having prescribed procedures in terms of how trading operates. It also has the benefit of not attracting business rates.

## Notes

[illegible]

## Notes

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**TOWER HAMLETS**