

Consultation on Street Trading and Pedlary Laws

Rugby Football Union (RFU) response

Introduction

The RFU is the national governing body for rugby union in England. The RFU owns Twickenham stadium, the home of English rugby and the headquarters of the RFU. It is one of the foremost sports and concert venues in Europe with a spectator capacity of 82,000. Twickenham Stadium sits within the London Borough of Richmond upon Thames and the RFU work in conjunction with the Council to ensure that the environment in and around the Stadium is safe and secure. This includes the protection of consumers from unauthorised street trading and the enforcement of trading standards.

As a large business in the area, we contribute significantly to the local economy. As a national governing body, we exist to grow rugby union in England. All profits from event days are reinvested back into the game. The RFU has concerns that additional street trading outside the stadium could lead to a loss of revenue which is harmful to our business operation and consequently to the state of English rugby across the country.

Background

A large majority of spectators travel to Twickenham via public transport. The major transport hub is Twickenham station which can carry around 38,000 people on an international match day. The walk between the station and the stadium, along Whitton Road and Rugby Road, is a major part of the match day experience with Richmond Council currently licensing a number of stalls for both catering and merchandising. These licenses are granted on a game by game basis although some licenses do have a longer tenure.

Richmond Council currently works with the RFU and the police on the number of stalls they license. Crowd management and health and safety are closely considered, guided by the local police.

Richmond Council currently has four enforcement officers within their licencing team of which three work on an event day. This is in addition to two trading standards officers. With the reduction of policing numbers on event days this is impacting upon the effectiveness of street trading officers as they have only limited police back up to enforce any sanction.

Consultation response

The RFU supports the Government's central mantra to boost economic growth by supporting business and reducing bureaucracy. However, the RFU has concerns that any repeal on the Pedlars Act, and any reform around static street traders, could present issues of;

- (i) Crowd management
- (ii) Health and Safety
- (iii) Commercial exploitation

Crowd Management

As stated above, we have significant numbers of spectators travelling to Twickenham for international and national rugby games, and for music concerts. The RFU understands that the coalition plans to reform laws on static street traders, including removing council powers to refuse an application on the grounds there are already enough traders and shops in a particular area. We would oppose this move on crowd safety grounds. Rugby Road in particular is already extremely congested on an event day and there is simply not space to cater for additional static street traders. All that would happen is that pedestrians including mothers with push chairs, children and elderly supporters would be forced onto the roadway in order to avoid the street pedlars. This is clearly unacceptable and should not be allowed to happen. The flow of people from the station to the stadium and vice versa is a closely

monitored operation administered by traffic management experts. The RFU strongly opposes extra seller sites being permitted around the stadium for crowd safety reasons and believes that it would be irresponsible to allow such activities within already congested streets.

Health and safety

The RFU works closely with the Council to ensure that all static sellers and pedlars have appropriate health and safety certificates. We understand that local authorities have previously raised concerns about looser restrictions around street trading, warning that an increase in numbers would make it more difficult to monitor traders and ensure that they were following strict health and safety regulations. The RFU agrees that a relaxation of the law could lead to unprofessional outfits operating in and around Twickenham with potentially harmful consequences for customers.

We also believe that there is insufficient Council and police resource to monitor the pedlars and ensure that they comply with the terms of their licence. Police numbers at our events have already reduced significantly and the Council resources are already stretched on match days.

Commercial exploitation

The RFU is a not for profit organisation with all profits made reinvested back into the game. The current legislation requires those wishing to peddle to obtain a pedlar's certificate and pay a fee for this. This allows the Council to closely monitor the sale of goods on the streets surrounding Twickenham, therefore protecting our own brand and official trademarks. An increase in numbers would make it more difficult to monitor traders in an already challenging enforcement environment.

The RFU takes the protection of its brand and marks extremely seriously. We rely on trading standards and others to ensure that counterfeit goods are destroyed and taken off the streets. The RFU has high profile sponsors who pay considerable amounts of money for the exclusivity of the RFU brand. We also have concerns that a liberalisation of the law could decrease merchandising revenues as spectators and fans buy illegal goods to and from the stadium and do not therefore obtain official goods via legal RFU shops and stalls.

Conclusion

In conclusion, the RFU is strongly against the liberalisation of the street trading and pedlary laws which will have significant consequences on the safety of spectators going to and from the stadium and will impact on our event day commercial and operational performance. The RFU believes that unregistered static street traders and pedlars could lead to crowd management and health and safety issues. We would not like to see peddlers selling in the street. The RFU is also concerned that an increase in street trading could have a grave impact on its revenues which in turn affects the health of English rugby. The RFU is a big contributor to the local economy and to economic growth in the area. The joint working between Richmond Council and the police to combat unauthorised street trading is effective and we would not like to see changes in legislation that it make it even harder to police and enforce.

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