

Dear Mrs Fairweather,

On behalf of the Hampstead Professional Dog Walker's Association

This is a letter to set out a proposed compromise between the professional dog walkers and the CoL regarding the licensing scheme to be introduced in October this year. We have argued since November last year that the scheme, as it was introduced and as it stands, although it has been marginally improved, is an unnecessarily severe scheme. We have argued [repeatedly](#) that there is a scheme which could both protect and enhance the Heath without threatening the livelihoods of the dog walkers. The CoL's representatives have agreed that, in-line with other schemes around London; the AM/PM licensing was unnecessary; that the licenses must be transferable within a company to reflect the flexible nature of the industry; and that the licenses should be costed on a pro rata basis so that part time and full time dog walkers pay a license fee proportionate to their use of the spaces. We appreciate these concessions but would underline that they were concessions on proposed features that do not exist in any other dog walking licensing scheme in London. The scheme remains unnecessarily severe with regard to the overall number of licenses that will be available and the number of dogs that dog walkers will be allowed to walk at one time.

Over time the CoL's justification for the scheme has transformed. Whereas at the start we were told that the scheme was about protecting the Heath from badly behaved dogs and dog walkers now, after we have pressed many times for evidence of this which has not been forthcoming, we are told that the scheme is about protecting the environment. And who can argue with that?! One theme that has been consistent, has been that the authorities should be able to know who is using the spaces for commercial purposes and to obtain a payment for the use of those spaces. We have never had any objection to that. What we object to is that from the first day of the scheme, every dog walker who is unable to obtain a license (which will be more than two thirds of the operators if there are only the equivalent of forty full time licenses) will be out of a job. They have worked very hard, taken on personal financial risk and built their companies from the ground up. With the scheme as it stands they will have no way to offer their services (off-lead runarounds and socialisation in nature) to their customers on day 1. Further, the lucky few who obtain a license will see an average 33% drop in their revenue, when they are forced to walk four dogs instead of six. This will be an enormous hit to their profits making the business unviable for all but the rarest of operators - those who do not use vehicles and those who already charge a premium over their competitors. Further, the scheme as it stands is a lottery. Securing a license or licenses one year does not guarantee that you will be able to secure the same number next year. It will be impossible to run a business when you don't know if you will be permitted to work each January 1st and how many employees and customers you will be able to support. I am not a dog walker any more. I can think of nothing I would rather do less than debate policy with the City of London. I am a supporter of honest, hard working, small businesses men and women and I do not exaggerate when I say that there are very few operators who will be able to overcome the damage done by this scheme as it is proposed.

The compromise we propose is this. Do not cap the number of licenses overall. Richard, Bob and myself have agreed that we should seek to formulate a clear understanding of which walkers use which spaces so that the demand for dog walking licenses can be spread around the spaces to minimise any supposed impact of professional dog walking. I have sent an email to our association today asking everyone to think about which space they would choose if they had to choose and how many days a week they are likely to need. So, instead of capping the overall number of licenses from

the outset, issues licenses for the different spaces, so that everyone currently working can continue, and then use your rights under the legislation to aggressively remove licenses from operators who breach the terms of their conditions. This has always been our position. Permit work to continue and then punish those operators who do not adhere to the agreed standard. Do not indiscriminately ban two thirds of the operators on day 1. You have said in the past that the number of licenses must be kept under review. We agree. But starting from a low point and saying we might review the number upwards after a year will not help the businesses who aren't able to obtain the licenses they need and must sit on their hands for a year waiting incase more licenses become available. The second part of the compromise we suggest is this. Limit the number of dogs to be walked by each walker to five not four. The industry-wide indemnity insurance stipulates six. We know that some other licensing schemes limit four dogs. But some other schemes, for instance in Battersea, limit eight. We would remind you that what is a national average (in effect revenue) cap might not be appropriate for businesses operating with much higher costs in more expensive locations. We would remind you that the spaces we are discussing are not like Richmond with it's deer or Primrose Hill with its limited space. The spaces in question are larger, more heavily wooded and therefore a scheme should be introduced that reflects the nature of the spaces and not be a carbon copy of lazily approved schemes around London that have already led to displacement with the associated additional traffic and pollution. As part of the compromise we propose that with any group of five dogs being walked, two must be kept on leads at all times. This must represent a substantial improvement, to your mind, on the prior situation. As many as eight or more dogs running around off-lead, with no regulation or license fee becomes instead four dogs running around off-lead with two on leads at all times and a walker's registration number that they may be held accountable against after paying a contribution for the use of the space and proving their insurance and assessments are in place. I would remind you that the key pillar of your 'stake holder engagement', the Sheaff report, proposed that a maximum of five dogs was the appropriate limit and did not propose any cap on the number of licenses. CoL has not demonstrated any intellectual justification whatsoever for the four dog/fifty license proposal except that some of its officers think it 'sounds about right'. Against which we, who work in the sector and have spent more than a hundred hours researching the issue, are telling you it will result in catastrophic damage to peoples lives.

Our proposed compromise is fair because it would achieve all of your stated objectives; To disburse the activity around the spaces; reduce the traffic; monitor and regulate the commercial activity; and enable you to identify and sanction trouble makers. We say this is a compromise because although it would still result in a substantial hit to the profitability of the companies it would enable them to continue to work and employ and pay taxes and provide a service to their customers many of whom, though their disabilities or old age, or childcare or work commitments rely on their dog walker. We put our compromise to our members and their customers in a petition you can see here at [change.org](https://www.change.org). We have gathered more than two thousand signatures to date and if you are interested I would urge you to read the comments section. You have heard my opinion several times. The comments section is full of other people's concerns about the proposed scheme.

A final word on adaptation. Several times your side have spoken to me about the need for companies to adapt. Of the fact that small companies must be agile and nimble I am in no doubt. But the truth is that companies in a healthy, dynamic market of the sort your mission statement imagines, must be adaptable to market pressures and not spend their lives forever adapting to government regulation. These companies have already had to adapt to the environmental imperative by beginning the transition to electric vehicles. These companies have taken on huge vehicle finance costs as part of

their determined effort to do the right thing. But after a year of lockdowns, with spiralling rents, and with all the costs of being in business, this last regulatory burden will be too much to bear.

As it stands the proposed scheme will see many good businesses run into bankruptcy. The proposed scheme will result in the devastation of a young, healthy, industry and sadness and frustration for the thousands of clients who's lives will be disrupted and many of whom will have to give up their dog - their best friend. The compromise we have proposed satisfies your objectives and takes the dog walkers another step towards becoming a modernised, regularised industry. It is a baseline from which future relationships can be developed. You will not find a group more passionate about the soul of the Heath than the professional dog walkers. They are the direction givers, the lost dog trackers, the litter pickers, the friendly advisors, the constabulary callers. We are genuinely seeking to work with you to protect the Heath. If you agree to our proposal I think you will be impressed by the level to which the community can rise. Literally as I write this, the attached correspondence popped into the dog walker's shared thread.

In brief, I have no commercial interest in professional dog walking. I write this as a concerned citizen, a believer in the importance of small businesses and as a daily user of the Heath I love. I beg of you. First try our proposal and review it in one year's time. You can always legislate for the elimination of two thirds of the operators at a later date but you will not be able to bring them back if the scheme that is introduced is too severe at the start.

Yours sincerely,

Edward Freeman

