

Appendix 6 -Summary of consultation feedback on draft Street Trading Policy – July 2012

<u>Date Received</u>	<u>Name</u>	<u>Organisation</u>	<u>Summary of Responses</u>	<u>Action</u>
07/08/12	Mr Simon Andrews	Asset Management Team for Lion Yard	<ul style="list-style-type: none"> I would question if the tariff for pitches are set at a full commercial rate, as anecdotally I understand some of the pitches are cheap' relative to the commercial value of sales generated. Are pitches openly re-tendered, if so is their a qualitative assessment for 'attractive new concepts'. Street/market trading is a great way to encourage a new line of retail entrepreneurs. I also think if the proposed BID goes forward, then street vending income ought to be credited to this initiative There are lots of examples around the country of 'best in class' does Cambridge intend to provide case studies for good or bad operations, by way of guidance or encouragement? 	<ul style="list-style-type: none"> The Local Government (Miscellaneous Provisions) Act 1982 permits the Council to charge such fees as they consider reasonable for the grant or renewal of a street trading consent. The power to set fees does not permit the Council to raise revenue generally. No the policy does not propose that pitches are re-tendered. Street Trading is not an area that would be covered by the proposed BID. This will remain a function of the City Council. The criteria for awarding consents as set out in section 5 set out the standards the Council will require and the street trading liaison meetings and 3 yearly street traders review meetings are being introduced to ensure high quality standards are maintained at all times.
13/08/12	Dr S Sangray	Cadwins of Cambridge	<ul style="list-style-type: none"> The current application process, whilst robust, lacks transparency 	<ul style="list-style-type: none"> The proposed changes to the policy seeks to balance the need to provide security for existing traders with the need to identify new street trading opportunities where possible. The Council considers that the procedures,

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			<ul style="list-style-type: none"> • What is termed by “high quality” • How is this measured and tested? • There still remain huge gaps in the offerings available as compared with the needs of the city’s huge change in demographics. • Several eateries exist but there is still a distinct lack of ethnic foods <i>on the go</i>. Considering the huge touristic inflow from overseas, particularly South Asia, there is little accommodation of their dietary requirements. A policy that maps the <i>offering</i> with the <i>needs</i> should be the cornerstone of future implementations. • The emphasis on local produce could be much more aligned with the dynamic and innovative nature of this world-renowned city. Very little of the produce offered is in fact locally produced. • The packaging utilised should be much more closely scrutinised and where possible, traders should be encouraged to reduce the carbon footprint of their products. Whilst the 	<p>which are proposed, are robust and fair and practical to implement.</p> <ul style="list-style-type: none"> • The standards the Council requires are set out in section 5 of the draft policy. • This is measured annually through the annual application process and through the 3 yearly Street Trading review meetings. • This could be a consideration when assessing new applications against the “Type of Goods Sold” as set out in section 5.2.7 of the draft policy. • Street trading pitches in Cambridge are limited and new or vacant pitches are not often available. Where they do become available pitches will be assessed as set out in section 5.5 of the draft policy. The Council can only consider stall types, which are appropriate for the location (i.e. hot/ cold food/ or retail) and from those that apply at a particular time when the vacant pitches are advertised. • The Council is unable to use this as a criterion as it would be against EU legislation. • This would be challenging to enforce. However this is the opportunity to encourage this through the street trading liaison meetings and 3 yearly
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			<p>policy is in place, there are opportunities for further improvement.</p> <ul style="list-style-type: none"> In instances where applicants are refused permission, there should be an opportunity to discuss the reasons for the refusal in detail. Applicants should be given an opportunity to rectify issues if they are minor or be given feedback that may help with further applications. Having been refused permission to trade, our company was left with no feedback, which could be incorporated, into future applications. 	<p>reviews.</p> <ul style="list-style-type: none"> The Council sees no reason why detailed feedback should not be provided in future on unsuccessful applications
22/08/12	Mr J Fenton	National Market Traders Federation	<ul style="list-style-type: none"> Should a short/long term or permanent move of a street trader need to take place due to highway changes etc., to work closely with affected trader to situate them as close to existing site as possible so as not to affect their business/customers – can this be a new point included in the draft? 2.1 – NMTF should be National Market Traders Federation (not Association) 4.4/4.5 – Where ‘Consents can be revoked by the City Council at any time’, It would be helpful to add ‘if in breach of conditions’. This will provide clarity for traders and Councillors who may change through the years 	<ul style="list-style-type: none"> Street Consent Conditions updated to include the following point (13) “Where temporary disruption to the street trading pitch is necessary (e.g. for work on the public highway) the Markets and Street Trading Manager will investigate the relocation of the trader/pitch to a suitable position on the Highway as close as possible to the original designated pitch. “ Draft policy The legislation under which the Council regulates street trading provides that a street trading consent may be granted for a period not exceeding 12 months and may be revoked at any time. The Council is not able to change this.

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			<ul style="list-style-type: none"> • 5.1.19– It would be helpful to state ‘.....do not conflict with the goods sold by other retailers and street traders within a certain area.’ This would give clarity to existing street traders that their long term investment programs have some form of protection from an identical stall being given consent just 100 yards away and ensure diversity from new applicants to come up with new/different food/clothing/jewellery ideas. • 5.4.6 – The consultees listed in section 2 (referred to at the end of this section) includes the NMTF – can you clarify that we will be included in the consultation please • 5.3.2 – We are happy to have a 3 yearly Street Trader Review • 5.2.2– Can you include that reminders will be sent to traders at the beginning of September each year. This will give everyone 8 weeks to comply with the renewal date of 1st November. As you are proposing introducing the new policy & procedures on 1st November 2012, we assume that a later date for completing and handing in our renewal applications will be permitted – could you confirm this to us please • 15 on page 2 of the Consent 	<ul style="list-style-type: none"> • Draft policy updated accordingly • The NMTF will be consulted when designating new pitches • Draft policy updated to reflect this. • Draft policy updated accordingly
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07/09/12	Mr D Strauss	Independent	<ul style="list-style-type: none"> • I am very disappointed that this draft policy seems even more 	<ul style="list-style-type: none"> • The draft policy has been developed following extensive research into best

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			<p>anticompetitive than the previous policy. Under the old policy a new entrant could at least challenge an existing trader and have a fair hearing in front of the licensing subcommittee but now, under the new draft policy, this right would be removed.</p> <p>1.</p> <ul style="list-style-type: none"> • FEES The ice cream pitches cost traders £8 a day. This is the equivalent of selling four ice creams: the retail bargain of the century. The council is missing a major revenue raising opportunity. The draft policy goes no way towards improving this situation and the council tax payer is the loser. • QUALITY AND SOURCING OF GOODS SOLD Nowhere in this draft policy is there any mention of using locally sourced ingredients, or even locally made products. The Draft Policy doesn't even set a minimum standard of quality of goods sold (ie percent of milk in ice creams). This is a major missed opportunity. • PITCH FOR LIFE The worst feature of the draft policy is that it fails to open up the street trading pitches to genuine free competition by allowing new traders the chance to bring in fresh ideas and revitalise the street trading scene in Cambridge. 	<p>practise nationally. It seeks to encourage investment from street traders and to create an environment where high quality street trading activity is achieved. Where possible and within the constraints of this policy, the Council aims to support new street trading opportunities</p> <ul style="list-style-type: none"> • The Local Government (Miscellaneous Provisions) Act 1982 permits the Council to charge such fees as they consider reasonable for the grant or renewal of a street trading consent. The power to set fees does not permit the Council to raise revenue generally. • The council is unable to use this as a criterion as it would be contrary to EU legislation. • This policy does not offer a pitch for life as traders must apply annually and will be assessed against strict criteria in order to ensure consistent quality standards are maintained. In this draft policy the Council has sought to recognise the significant investment that many street traders have made in
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07/09/12	Mr Nicholas Hellowell.	Independent	<ul style="list-style-type: none"> I wish to object to these proposals on Urban Design or Townscape grounds. I find it ironic that the department of the Council which promotes the beauties of the City should undermine its own efforts and choose to denigrate the centre by not reducing their number, impact and remove those from the most sensitive locations. In particular those stalls in Sidney Street outside Holy Trinity and disfiguring both its setting and the surrounding railings; that at the corner of Bridge Street and St John's Street at one of the busiest pedestrian corners in the city centre; in King's Parade/Trumpington Street in the principal focus of visitor assembly; as well as the stalls on the Backs both at Garret Hostel Lane and at the back gate of King's College. 	<ul style="list-style-type: none"> The purpose of this Street Trading Policy is to create a trading environment in which street trading complements the surrounding environment and retail offer, is sensitive to the needs of all users of the city centre and provides diversity in terms of consumer choice. It provides an important affordable trading opportunity for small businesses. This street trading policy sets high standards in terms of stall design to complement the historic environment.

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07/09/12	Ms Y	Environmental		

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	O'Donnell	Health	<ul style="list-style-type: none"> • Para 5.1.14 amendments in italics There is suitable and sufficient hand washing facilities with hot "<i>and cold water</i>" • Second bullet point amendments in italics "Work and other surfaces likely to be in contact with food are to be impervious, smooth, washable, non toxic and readily cleansable" • 5.1.17 – second bullet point -All food handlers have received adequate food safety training appropriate to their job role (delete the rest of the paragraph which set out aspiration for levels of Food Handling qualifications) • 5.1.17- 4th bullet point in this paragraph add at end businesses registered outside of Cambridge City Council should obtain such agreement from the Local Authority the business is registered with • After this should there be a general consideration of any history an applicant might have of enforcement including waste, noise, health and safety, smoking, complaints • Has any thought gone into the environmental considerations such as recycling provision or public health such as a health eating options. 	<ul style="list-style-type: none"> • Draft policy updated • Draft policy updated • To be agreed at committee on 8th October • Draft policy updated • Suggest the inclusion of an additional bullet point to be included under the Environmental Health considerations to reflect this. To be agreed at committee on 8th October • Considerations around recycling and healthy eating are important but as a first step it will be important to understand the practicalities around introducing conditions in this area and
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