

Is the Draft Street Trading Policy easy to understand ?

Theme	No. Comments	Summary	Officer comment
Length/Layout/ Structure of Policy	15	<ul style="list-style-type: none"> The document is too long and wordy. Clearer use of layout with less clauses/sub clauses and clarification of sub-headings. 	Comments noted and will be considered in future review. Any significant changes now will require a further consultation.
Language	7	<ul style="list-style-type: none"> Use of 'jargon' Not easy for the layman to understand. Language ambiguous and open to interpretation. 	Comments noted and will be considered in future review. Any significant changes now will require a further consultation.
Summary	5	The inclusion of a summary/executive statement, precis, or key points section would improve the draft Street Trading Policy.	Comments noted and will be considered in future review. Any significant changes now will require a further consultation.
Encourage Street Trading	3	<ul style="list-style-type: none"> A criminal record should not be a barrier to being a Street Trader. The Policy does not encourage Street Trading "<i>Let local entrepreneurs trade</i>". 	Comment noted, all applications are considered on a case by case basis Not sure what point is being made ?
Suggestion	2	There was a suggestion for the policy to include more examples and another for including a process map.	This is something that can be considered and included in a future review.
Other	2	One commenter stated that enforcement of the policy was weak and another mentioned charity collectors (stating that they are a nuisance).	All matters are dealt with on a case to case basis. Enforcement is not a new provision in the draft policy. Charity collectors are not included within the legislation for street trading.

General Comments

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Other consideration that should be taken into account	8	<ul style="list-style-type: none"> • Experience • Consult PSPO • Trading near similar businesses/More than one trader selling the same items. • Remorse as part of Criminal Check • Local Residency 	<p>Noted.</p> <p>Not sure why PSPO would be consulted, but they could be consulted if the situation warranted it.</p> <p>This is already a consideration in the policy.</p> <p>Each application is assessed on a case by case basis.</p> <p>Applicants must meet policy criteria which does not limit where they must be resident.</p>
Suggestions for Document Inclusions	8	<ul style="list-style-type: none"> • Key Aims, Summary or Overview page. • Summary of changes • Charges for Street Trading Permits • Map • Definitions/Terminology – Pedlars, Nuisance (regarding Section 8 clearing litter, commenter did not feel emphasis was strong enough). 	<p>All noted and will be given due regard in a future review. A further consultation will be required.</p>
Enforcement & Standards	7	<p>Comments were received around enforcement which included</p> <ul style="list-style-type: none"> • More checks • Checks unfair if bricks and mortar shops were not subject to the same checks. • Need easy process for reporting suspected breaches of policy. • The need for products sold by Street Trader to meet UK standards and regulations e.g. unsafe toys or fake products. 	<p>Generally speaking Street trading consent holders do not cause enforcement issues. It's usually illegal Street Traders that are investigated and communicated with. A section can be added in a future review which covers these concerns. Shops do not fall within the remit of Street Trading legislation.</p> <p>It's a criminal offence to deal in counterfeit goods and there is also a variety of safety regulations in force to ensure that things like toys, cosmetics and electrical items are safe to use. It's an offence to supply goods</p>

			that don't comply with regulations and we would expect applicants to comply with legislation . Applicants must list the goods they are selling as part of the application process if Officers are in doubt they will query the items with the applicant.
Other 'Street Trading'	4	<p>Comments mentioned widening scope of policy to include/cover:</p> <ul style="list-style-type: none"> • Charity collections • Car advertising and selling vehicles form the public highway • Car washers 	None of these activities fall within the legislation for street trading.
Covid-19	2	<ul style="list-style-type: none"> • Requirement for Covid-19 vaccinations if interacting with public. • Behaviour guidelines in respect to Covid-19 	Because of the constant changing regulations this information was not included in the Policy and applicants were referred to current guidance. We cannot legally insist all applicants must be vaccinated. Even though most restrictions have been lifted we will still encourage applicants to protect others
Brick & Mortar Shops	2	<ul style="list-style-type: none"> • Commitment to supporting bricks and mortar shops. • Decline of the Town Centre • Loss of trade for storekeepers. 	General Comment - Not relevant in regard to the Street Trading Policy.
Other	3	<ul style="list-style-type: none"> • Positive about Draft Street Trading Policy. • Concern about policy complying with Human Rights and Equality legislation. • Right to trade. 	<p>Noted</p> <p>The Council is bound to act reasonably and consistent with its general obligations, for example those under the Human Rights Act 1998 and the Equality Act 2010.</p>