

City of Wolverhampton Draft Street Trading Policy Consultation Response and Recommendations

Regulatory Committee Report

Appendix 1 - Street Trading Draft Policy Consultation Responses

1. Introduction

City of Wolverhampton Council undertook a non-statutory public consultation exercise on the following in scope elements for the review of street trading:

1. draft street trading policy;
2. updated street trading consent conditions;
3. pre-determined consent locations;
4. return control of promotional spaces to the City of Wolverhampton Council.

This report summarises the opinions and views of key stakeholders (internal and external), presented during the consultation, by way of individual online survey submissions, written responses and in-person consultation sessions.

2. Timelines

There is no statutory requirement to have a policy for street trading and therefore there is no statutory time period for consultation. However, the Council recognise the importance of the views from key stakeholders and undertook the consultation for the draft street trading policy from 7 July 2022 to 30 September 2022 (time period total 12 weeks).

The consultation on the pre-determined consent locations was undertaken 22 July 2022 to 18 August 2022 (time period total 4 weeks).

3. Overall format of consultation

The aim of the consultation was to provide the general public, existing street trading consent holders, street trading associations, local businesses, business improvement districts and key decision makers with an opportunity to provide their views about the proposals to adopt a street trading policy for all Wolverhampton wards.

The Council in developing its strategy for consultation has in addition, taken account of best practice adopted by other councils relating to street trading policy adoption.

The consultation comprised a range of methods of communicating to interested parties about the proposals. These are outlined below. The work was split between an external audience and internal channels.

4. The forms of consultation / information provision

Other Councils

Walsall Council

Birmingham City Council

Internal services involved:

City Transport
Enforcement
Environmental Health
Equalities
Highways
Legal
Licensing
Markets
Planning
Public Health
Regeneration
Safeguarding
Street Scene
Trading Standards
Waste

Ward members:

All ward members contacted via bulletin and invited to an online question and answer session.

Online consultation

Using the Council's online consultation hub Citizen Space:

<https://consultation.wolverhampton.gov.uk/cwc/wolverhampton-street-trading/>

<https://consultation.wolverhampton.gov.uk/cwc/wolverhampton-street-trading-new-locations/>

Direct mailing (letter, email or both)

Existing street trading consent holders
Street trading associations
All businesses within the area concerning the pre-determined consent locations
Business Improvement Districts
Molineux catering team
LSD promotions (independent market and events promotion)

Key stakeholders:

West Midlands Police
West Midlands Fire Service
Counter Terrorism

In-person Consultation Sessions

A range of public consultation sessions were also held at a venue or online:

Street Traders and Trader Associations

Date & time: Friday 15 July 2022, 16:00 – 18:00

Venue: Council Chambers, Civic Centre, St Peter's Square,
Wolverhampton WV1 1SH

Date & time: Sunday 21 August 2022, 09:30 – 10:30

Venue: Zoom

Date & time: Wednesday 21 September 2022, 19:00 – 20:00

Venue: Zoom

Wolverhampton Business Improvement District (BID)

Date & time: Tuesday 12 July 2022, 15:30 – 16:30

Venue: (BID AGM) Casino 36, 56-58 Temple Street,
Wolverhampton WV2 4AQ

Date & time: Thursday 18 August, 13:00 – 14:00

Venue: Microsoft Teams

Local Businesses

Date & time: Monday 1 August 2022, 13:00 – 15:00

Venue: Wolverhampton City Archives, Whitmore Hill,
Wolverhampton WV1 1SF

Ward Members

Date & time: Thursday 18 August 2022, 17:00 – 18:00

Venue: Microsoft Teams

5. Consultation responses overall

Respondents were requested to make representations on the proposals by online questionnaire, with emails / direct letters also invited.

The summary of feedback and the Council's response are outlined in Section 5.3.

5.1 Internal and key stakeholder responses

Consultee Service	Representative/s	Date of comments	Quality assurance / comments returned
Fire Service	Fire Safety Officer and Licensing	30/03/2022	WMFS are not statutory consultees for street trading licenses. Unless it impacts upon the Licensing Act 2003, it does not fall within the scope of WMFS enforcement or consultation activity at present.
Police	Wolverhampton City Centre Inspector	14/04/2022 / 05/05/2022	Comments made regarding mitigation to violent persons, Protect Duty to the policy and comment to bin provision.
Counter Terrorism	Counter Terrorism Security Advisor	27/09/2022	Advice provided on vehicle mitigation measures. A new addition has been made to <i>Appendix C - Street Trading Consent Conditions</i> : "Vehicles will not be permitted adjacent to a street trading unit unless permission has been granted by the Markets General Manager. Consent holders will have to comply with measures advised by a Council Officer of the police."
Safeguarding	Service Manager, Safeguarding and Exploitation	10/05/2022	Advised inclusion of DBS and a condition that traders are to complete Safeguarding and Exploitation training.
Legal	Senior Solicitor	05/05/2022	Comments added to Transfer of Consents. Comments added to Enforcement Actions. Additions added to paras 10 (occasional consents) & 2.3 (clarity to standard conditions).
Highways	Service Lead, Traffic and Road Safety	27/04/2022	Comments added in relation to towbars.
Planning	Section Leader	04/05/2022	No comments or additions to make to Draft Policy, Appendix 2 & Appendix 3.
Street Scene	Environmental Place Based Development Manager	27/04/2022	No comments or additions to make to Draft Policy, Appendix 2 & Appendix 3.

Waste	Waste and Recycling Development Manager	03/05/2022	Comments added to Policy in relation to waste bin provision by traders.
Regeneration	Regeneration Manager	28/04/2022	No comments or additions to make to Draft Policy, Appendix 2 & Appendix 3.
Markets	Markets General Manager	Throughout process	Comments added throughout policy and appendices addressed prior to working group circulation.
Enforcement	Section Leader, Compliance	05/05/2022	Comment added regarding stabilizing legs on trailers.
Equalities	EDI Advisor	05/05/2022	Advice provided relating to Public Sector Equality Duty and suitability of applicant (traders giving consideration for disabled customers preferred).
Trading Standards	Service Manager, Trading Standards	03/05/2022	Addition made to Enforcement Actions in policy.
Public Health	Senior Public Health Specialist	05/05/2022	Comment added regarding rewording of the consideration of the health of the public in section Protection and Promotion of the Public's Health in Wolverhampton
	Director of Public Health	20/07/2022	Comments made on Vehicle Mitigation Measures
Environmental Health	Team Leader, Environmental Health	29/04/2022	Comments added to clarify minimum 4-star rating requirement, evidence for Food Safety training, gas / electrical certificates provision and last inspection report (previous Local Authority).
Licensing	Section Leader, Licensing	11/05/2022	Comments added in relation to evening consents.
Urban Traffic Control	Team Leader, Urban Traffic Control	24/10/2022	Comments made in relation to the Site Assessment (obstruction of utilities / highway infrastructure; impact on cycling); Traffic Regulation Orders (access control bollards); physical safety and trader liability for structures; change reference of service to City Transport.
Transport Strategy	Service Lead, Transport Strategy	24/10/2022	Agreement with Urban Traffic Control's comments, nothing further to add.

5.2 Ward members responses

Fifteen ward members attended the online, drop-in consultation session; Councillor Moran, Councillor Hyatt, Councillor Dalton, Councillor Russell, Councillor Page, Councillor Jaspal and Councillor Singh asked questions on various topics, whereby Officers provided answers and took comments provided on board, where applicable.

5.3 Consultation responses summary

Policy or Survey reference	Amend / inclusion / suggestion / survey answer	Contributor	Date provided	Council response / how will the draft policy be updated?
<p>Section 8.0 Key Considerations when Assessing an Application – Needs of the Area Reference: multiple tradelines</p>	<p>How are the Council to assess / monitor duplicate street trading tradelines?</p>	<p>Street Trader</p>	<p>15/07/2022</p>	<p>An Assessment Criteria will be created which will provide CWC Officers with a method to consistently and fairly assess all application criteria, including tradelines.</p>
<p>Section 8.0 Key Considerations when Assessing an Application – Additional Workers Reference: ID Cards</p>	<p>High turnover of staff on some units would make cards costly and impractical. Could there be a new assistant “trial period” prior to obtaining a card? Can ID Cards be for the consent holder / one vendor only, to just be displayed on request?</p>	<p>Street Trader</p>	<p>15/07/2022</p>	<p>New starters could be issued with a temporary ‘trainee’ card at their employment inception and during their training period before obtaining an individual card once past their probation. But it will be a requirement for all workers to display an ID card. A two-week grace period will be allowed during new starter training period before an ID card check will be required. This has been added to the policy.</p>
<p>Section 8.0 Key Considerations when Assessing an Application – Suitability of the Applicant Reference: DBS Checks</p>	<p>High turnover of staff on some units would make immediate checks and cards costly and impractical. Could there be a ‘new assistant trial period’ prior to obtaining a check? Can ID Cards be for the consent holder / one vendor only? (To be displayed on request).</p> <p>One response alleged such checks would be discriminatory against anyone with any convictions.</p>	<p>Street Trader Survey responses</p>	<p>15/07/2022</p>	<p>As the Council cannot request DBS checks for businesses, and as businesses perform their own employee checks, it is important that all street traders can evidence they are licensed by the Council, and all staff will require a DBS check and ID card. This requirement will be for all types of street traders, including mobile consents and match day consents.</p>

	Other responses referred to the checks being an employer's responsibility and not the Council's.			A two-week grace period will be allowed during new starter training period before a basic DBS check will be required. <i>Section 21.0 Interim Arrangements – Implementing the Policy</i> has been amended to outline the 2-week week “grace period” for DBS checks. <i>Appendix D - Guidelines On Relevant Convictions</i> contains detailed information on types of convictions for each case to be decided on its own merits.
Section 13.0 Temporary Relocation	Clarity is required, e.g., street works which deems relocation absolutely necessary. If a suitable alternative cannot be found, would there be a suspension of fees? Without clarity it is vague and open to interpretation	Street Trader	15/07/2022	Clarification has been added to <i>Section 13.0 Temporary Relocation</i> and <i>Appendix C – Street Trading Consent Conditions: Should a pitch become temporarily unsuitable for any reason, the Council will seek to relocate consent holders to an alternative street trading pitch. The Council will not be liable for any claims for loss of earnings etc. If agreement cannot be reached on relocation, then consideration needs to be given by the trader in terms of giving notice for the consent and by the Council in terms of revoking the consent.</i> <i>If the Council offer an alternative pitch then there will be no suspension of consent fees.</i>
Section 15.0 Applications for Grant or Renewal – Consultation	Concern over Business Improvement Districts / shops objecting to the location of a long standing street trader; causes uncertainty that business will influence a decision to move a trader on.	Street Trader	15/07/2022	The Council has provided assurance to street traders on many occasions, and prior to this consultation, that the street trader locations are a Council decision, and although businesses (shops) maybe consulted on a consent, businesses do

				not have decision making power regarding a trader's location.
Section 8.0 Key Considerations when Assessing an Application – Prevention of Nuisance Reference: Waste disposal.	Very minimal waste is generated, this is often removed from site and disposed of domestically.	Street Trader	15/07/2022	Food traders are responsible for the disposal of their own waste in accordance with legislation. The policy has been amended with this statement for consistency.
Special events and occasional markets	The Council ought to amend and introduce an “inclusion policy” with the written definition of including all annual street traders.	Street Trader	21/08/2022	Following due consideration, the policy shall not be amended to include this suggestion. Reason: the contractual arrangements fall within the remit of City Events Team.
Section 0.7 Types of Street Trading Consents Reference: Evening Consents	Can the evening consent be reverted to the original time of 18:00? Can it be extended until 06:00 to cater for the late-night customers that exit the Gorgeous nightclub?	Street Trader	21/08/2022	Following due consideration, the policy shall not be amended to include this suggestion. Reason: due to street cleansing timetable.
PLM (private land match day) Consents	PLM consent for Molineux match days for further consideration.	Street Trader	21/08/2022	Consents can only be for match days. Consideration will be given during the SAG process as to whether traders will be allowed to trade for events.
Section 8.0 Key Considerations when Assessing An Application – Suitability of the Trading Unit and Appendix B	What is the timeframe for new unit designs? Consideration should be given to financial commitments on carrying this out, as street traders may not be able to put aside funds. Survey responses ranged from “3 – 6 months” to “10 years” transition period.	Street Trader Survey responses	21/08/2022	The timeframe will be a committee decision, but the Commercial Regulation Manager recommends at least 18 – 24 months for existing traders to transition their units. New applicants' units will have to meet the criteria straight away.

				<i>Section 21.0 Interim Arrangements – Implementing the Policy</i> has been amended to outline the transition period.
Appendix C – Street Trading Consent Conditions Reference, Survey Question: The condition relating to the transfer of the consent to a third party has been removed, applicants instead will be required to complete a new application form.	The responses received did not relate to the question asked. Instead, the comments were around business ownership.	Survey responses	30/09/2022	The decision to sell the business on lies with the business owner. The decision to grant a consent for a specified pitch lies with the Council. Consents are for a 12 month period and a new application would be required for any change in consent holder. <i>Section 16.0 Variations</i> has been amended to clarify that “a variation application can be used to inform the Markets Service of a change of current consent holder’s details, such as name, address and contact details”
Reference, Survey Question: Safeguarding and Counter Terrorism (ACT Awareness) training will become mandatory for all street trading consent holders and any additional workers working with them. If you are an existing or prospect consent holder, when and how would you prefer to receive your training (online or in person)?	Not the job of the trader. Delivered in person	Survey responses	29/09/2022	Due to the nature of street trading and the fact that individuals can apply for a consent at any time, it won’t be practical or cost effective to undertake training in person with a training provider with a minimum number of delegates. Training delivered online to an individual is therefore deemed the most appropriate delivery method. It is the responsibility of all citizens to be vigilant and understand the signs of a terrorist attack.
Appendix C Street Trading Consent Conditions - Conduct Reference Survey Question: Consent holders must comply with the Public Sector Equality	Should be personal belief and choice	Survey responses	29/09/2022	The Authority believes that all consent holders should consider how their behaviour affects people who are protected under the Equality Act 2010.

Duty. If you object to this change, please state why.				
Section 8.0 Key Considerations when Assessing an Application – Suitability of the Applicant Reference, Survey Question: All food traders will be expected to maintain a 4-star rating following an inspection from Environmental Health. If you object to this change, please state why.	Responses were split between requiring 5-stars and that the proposal discriminated against street traders.	Survey responses	29/09/2022	The Council has no power to require a minimum food rating from businesses. The Council issues the consents for street trading and are therefore able to control the quality and standard of the street trading food provision.
Section 8.0 Key Considerations when Assessing an Application – Needs of the Area	With regards to this paragraph, I would expect that the impact of a trading outlet selling a same / similar goods or products within 200 metres would need to be considered in the city centre in the same way as any other location. I would therefore welcome the removal of the text (excluding the city centre) to reflect the difficult trading conditions all businesses continue to face post pandemic no matter where their location. The city centre should be considered with the same importance and impact on existing outlets as other areas.	Wolverhampton Business Improvement District (BID)	20/09/2022	The text “(excluding the City Centre)” has been removed.
Appendix A – Pre-determined Consent Locations	Please can all the location information be reviewed as many of the retail units referred to by way of identifying the location for each of the trading pitches is out of date especially for the Dudley Street and Non-Dudley Street locations. A plan	Wolverhampton Business Improvement District (BID)	20/09/2022	This list was for initial reference as part of the policy consultation. <i>Appendix A - Pre-determined Consent Locations</i> will be replaced by a map of all existing consent locations which will be published on the City of Wolverhampton

	of the location of the trading locations would have really assisted in understanding the impact of the changes proposed in the consultation document.			Council website once the policy is implemented.
Suggestion: Flower Seller Pitch	We would welcome the injection of a vibrant sense of colour back into our city centre streets by the introduction of a Flower seller – would this be possible to identify a city centre location for this? We would consider Dudley Street / Queen Square, Victoria Square or the New Square (Bell Square) might offer a good location.	Wolverhampton Business Improvement District (BID)	20/09/2022	A flower seller could apply for any of the existing designated pitches within the city centre. Should they want to sell goods from an area that isn't currently designated, they can apply for a street trading consent which will be assessed.
Appendix A – Pre-determined Consent Locations Reference: Victoria Street Pitches	Appendix A identifies one trading pitch adjacent to Queens Arcade which we would respectfully ask that the trading lines for this location are sympathetic to existing business outlets. Whilst we welcome the public realm improvements, we do not wish to add competition on to the disruption for existing businesses in the area who have already faced significantly reduced footfall and trade in an already difficult post pandemic trading period.	Wolverhampton Business Improvement District (BID)	20/09/2022	Should a consent be applied for at that location, they would be subject to the assessment framework that is being introduced into the policy.
Appendix A – Pre-determined Consent Locations Reference: (Queen Square) Evening Consent Location	Within Appendix A there is no specific location identified for the evening pitch at Queen Square which is a longstanding pitch in frequent use. Whilst we are aware of the location of the pitch being close to the man on the horse statue in Queen Square we would recommend that this pitch	Wolverhampton Business Improvement District (BID)	20/09/2022	The Council are aware that the current evening consent holder, located on Queen Square has to move around if there are events on in that area. Regarding the discolouration from grease on the paving at the pitch location, we've referred the matter to

	<p>location would be better utilised for the positioning of the Late-Night Safe Haven. This location close to the Man on the Horse Statue would be better utilised and would offer a more visible/ prominent location for this fundamental resource making it more visible to a wider number of passers-by in the evening economy – therefore supporting a safer night-time economy for all. This location would also better facilitate the safe transfer of Safe Haven clients to the nearest taxi ranks.</p> <p>I also note that the cleansing required close to the evening pitch needs to be enhanced to remove discolouration from grease on the paving at the pitch location.</p>			<p>street cleansing and will speak to the consent holder regarding this.</p>
<p>Section 8.0 Key Considerations when Assessing An Application – Suitability of the Trading Unit and Appendix B</p>	<p>We welcome the opportunity to add vibrancy and character to our High Street through the introduction of individual and bespoke trading units. The timescales in which this should happen should be within the next 3-6 months - to inject individuality into the street scene but also to allow a reasonable time for existing stall holders to consider the design of their units.</p> <p>Whilst the preamble of the committee report emphasises bespoke designs, I think the wording contained within the draft consultation document itself could be stronger to more effectively encourage this. The design brief could also be amended to inspire individuality, vibrancy and to add a</p>	<p>Wolverhampton Business Improvement District (BID)</p>	<p>20/09/2022</p>	<p>The wording to this part of the policy has been amended to encourage vibrancy and individuality of unit designs. The timeframe will be a committee decision, but the Commercial Regulation Manager recommends at least 18 – 24 months for existing traders to transition their units. New applicants’ units will have to meet the criteria straight away. The additional criteria for traders in Dudley Street and Queen Street set out in <i>Appendix C – Street Trading Consent Conditions</i>, are functional requirements of the units as part of the conditions and are deemed separate to the design brief set out in <i>Appendix B – Design Brief for Units</i>. Therefore, no change will be made.</p>

	<p>sense of individual identity to our street scene.</p> <p>We would like to recommend that the additional criteria for traders in Dudley Street and Queen Street set out in Appendix C also be highlighted in the initial paragraph of the design brief of Appendix B for clarity of the requirements?</p>			
<p>Reference: Promotional Spaces (City Centre)</p>	<p>Wolverhampton BID Company Ltd currently manages the 4 promotional spaces in the city centre. We have effectively managed these spaces since 2015, initially having a service level agreement in place (2015 – 16) between ourselves and the City of Wolverhampton Council to manage these 4 spaces to add vibrancy and interest into the street scene and ensure the spaces are effectively and appropriately managed in accordance with the requirements of terms and conditions produced by the Council. We have invested significantly in terms of time, administration, promotion, and organisation of the management of the spaces with the role being undertaken by the BID team.</p> <p>As a BID Company any income we receive whether it be through the BID levy or income from the management of the promotional spaces we guarantee that this is utilised to support additional city centre events and activities to drive footfall,</p>	<p>Wolverhampton Business Improvement District (BID)</p>	<p>20/09/2022</p>	<p>The management of the spaces are to remain as proposed. All the positives raised by the BID can be achieved from management within the Markets Service.</p> <p>Closer controls and effective management can be provided with an approach consistent to the whole City. The Street Trading function is excluded from the BID, none of the street traders benefit directly from or contribute to the BID Levy. It is therefore preferable to keep the two separate.</p>

	<p>encourage dwell time and to always support our city centre businesses. Due to our remit, we absolutely guarantee that income received through the management of the promotional space would always be utilised to benefit the city centre. We would be concerned that if the Council were to remove these services from the BID's management, that the Council would not be able to ringfence any income received via the city centre's promotional spaces to support the city centre vibrancy in the same way.</p> <p>We maintain an up to date booking system, respond and encourage bookings, meet the requirements of the terms and conditions, provide maps and access route maps to all enquiries and update these wherever necessary.</p> <p>We have an established relationship with promoters who are keen to utilise the promotional spaces at Queen Square and Dudley Street, having built these relationships over the last 7 years.</p> <p>For each booking the BID's Ambassador service meet and greet each promoter and to ensure they are located in the correct location and that they are operating within the requirements of the terms and conditions for the space. I appreciate that the Council could introduce this</p>			
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	<p>service too to ensure the effective management of the street scene, this is already part of the Ambassador's team engagement role.</p> <p>Whilst we appreciate that the City Council are the highway authority, wherever required we seek clarification and consult with the relevant council officer for more bespoke promotional activities in terms of weight loads and access requirements. However, we know that the number of times we require this input from the City Council is limited and therefore we do not unnecessarily burden the Council's highways team with enquiries due to our in-depth knowledge of the spaces, terms and conditions and other city centre operational activities. We would be keen to introduce a further promotional space close to the Queens Building at Railway Drive/ Victoria Square as we see this as a prime location to inject vibrancy and interest to footfall arriving into the city from all areas of the Interchange, whether it be via the bus station, trains station or soon to be complete, metro.</p> <p>We have noticed that since the pandemic the promotional space bookings have predominately been from charities who have struggled to reach their customer base. This has resulted in reduced income as the charity rate is applied to bookings and means that income is close to one</p>			
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	<p>third of what it had achieved pre-pandemic in 2019.</p> <p>We therefore respectively ask that the Council consider supporting the city centre's vibrancy and sustainability by continuing to enable the Wolverhampton BID Company to manage the promotional spaces. We would like to proceed with the management of the spaces on a similar basis to that of the 2015 – 2016 Service Level Agreement.</p>			
Regulatory Committee report May 2022	<p>Lastly, whilst we welcome the review of Street Trading arrangements, we would like to note that contained within Appendix 5 of the committee report associated with the Street Trading Consultation document reference was made to early stakeholder consultation that had occurred in May 2022. I must advise, whilst we were listed as one of the organisations that had fed into this early stakeholder consultation we were not involved in any early consultation and were not formally informed that this consultation was happening until 9th June 2022.</p>	Wolverhampton Business Improvement District (BID)	29/09/2022	<p>This was an error in the Committee report where the Council stated that consultation with the BID had taken place in May 2022. The Council acknowledge that the BID were consulted in the second stage of the process (June 2022)</p>
Promoting the street trading offering to encourage footfall	<p>Can the Council promote the city's street trading offer to help support it?</p>	Street Trader	21/09/2022	<p>The Council support the suggestion of promoting the street trading offering. The Markets General Manager regularly promotes the town centre Markets on social media and can also promote street trading as part of regular communications operations.</p>

The table below outlines revisions that the Council have made to the policy or its appendices at the close of the consultation period, the reasons for which have emerged during the review process.

Policy or Appendix Reference	Amend / inclusion	Date	Reason
Appendix C – Street Trading Consent Conditions	Addition: “The unit must be maintained at an acceptable standard throughout the duration of the consent. Should the consent holder be advised by an Authorised Officer of the City Council, of any repairs or works required to the unit, these should be carried out at the timescale agreed.”	04/10/2022	Following analysis of the responses to the proposed new unit design criteria, and review of the conditions, it was noted that there was no condition relating to the upkeep of the unit. This has been subsequently added to ensure units are maintained at a high standard throughout the city and throughout the duration of a consent.

5.4 Draft street trading policy online survey

A total of seven people completed the online questionnaire for the proposed draft street trading policy.

Topline demographic information

Gender

Male	43%
Female	14%
Not answered	14%
Prefer not to say	29%

Disability

Disability	14%
No disability	29%
Not answered	14%
Prefer not to say	43%

Age

35 - 44	14%
45 - 54	14%
55 - 64	30%
65+	14%
Not answered	14%
Prefer not to say	14%

Survey questions and responses

1. **To what extent do you think street trading plays an important role in attracting people to Wolverhampton City Centre and Bilston and Wednesfield Town Centres?**

Very important	71%
Somewhat important	29%
Not important	0%
No opinion	0%

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2. **The draft policy sets out a trading unit design brief, with the intention of encouraging attractive, unique unit designs. What transitional period should be allowed for implementing the proposed unit design criteria for exiting consent holders?**

Less than 3 months	0%
3 - 6 months	14%
6 months - 1 year	29%
1 year	14%

2 years	0%
Other. Please state.	43%

'Other' responses ranged from three to ten years.

3. In assuring the public that street traders are safe and responsible individuals, should Disclosure and Barring Service (DBS) checks apply to existing consent holders?

Yes	43%
No (if No, explain why)	57%

'No' responses:

One response alleged such checks would be discriminatory against anyone with any convictions.

Other responses referred to the checks being an employer's responsibility and not the Council's.

4. Safeguarding and Counter Terrorism (ACT Awareness) training will become mandatory for all street trading consent holders and any additional workers working with them. If you are an existing or prospect consent holder, when and how would you prefer to receive your training?

Online video training (accessible any time)	14%
Delivered in person at a designated venue (daytime - before 5.00pm)	0%
Delivered in person at a designated venue (evening - after 5.00pm)	29%
This question is not applicable to me	43%
Other. Please state	14%

'Other' responses included that this was not the job of the street trader.

5. Thinking now about the draft policy document layout and structure, how clear is the document to read and understand?

Very clear	0%
Somewhat clear	42%
Not clear	29%
No opinion	29%

No other relevant comments provided.

The conditions relating to consents have been revised and some changes have been made. Notable changes to the conditions are listed in the following [four] questions.

For each notable change, please state if you have any objection and why:

- 5. The requirement for all street trading units to be plain white or silver has been removed.**

I have no objection to this change	100%
I object to this change	0%

- 6. The condition relating to the transfer of the consent to a third party has been removed, applicants instead will be required to complete a new application form.**

I have no objection to this change	57%
I object to this change	43%

'I object to this change' responses:

The responses received did not relate to the question asked. Instead, the comments were around business ownership.

- 7. Consent holders must comply with the Public Sector Equality Duty.**

I have no objection to this change	86%
I object to this change	14%

Objections related to personal choice.

8. All food traders will be expected to maintain a 4-star rating following an inspection from Environmental Health

I have no objection to this change	71%
I object to this change	29%

Responses were split between requiring 5-stars and that the proposal discriminated against street traders.

9. Do you have any other comments about the draft policy or consent conditions that you would like to add?

Yes	0%
No	100%

End Survey.

5.5 Pre-determined consent locations survey

A total of six people completed the online questionnaire for the proposed pre-determined street trading consent locations.

Topline demographic information

Gender

Male	33.3%
Female	33.3%
Prefer not to say	33.3%

Disability

Disability	0%
No disability	67%
Prefer not to say	33%

Age

35 - 44	17%
45 - 54	33%
55 - 64	17%
Prefer not to say	33%
Not answered	14%
Prefer not to say	14%

Survey questions and responses

1. Do you think there should be pre-determined consent locations on Victoria Street and School Street (locations labelled A – D [on the accompanying map])? If you have answered No for any location, please tell us why, clearly indicating the location reference in your response:

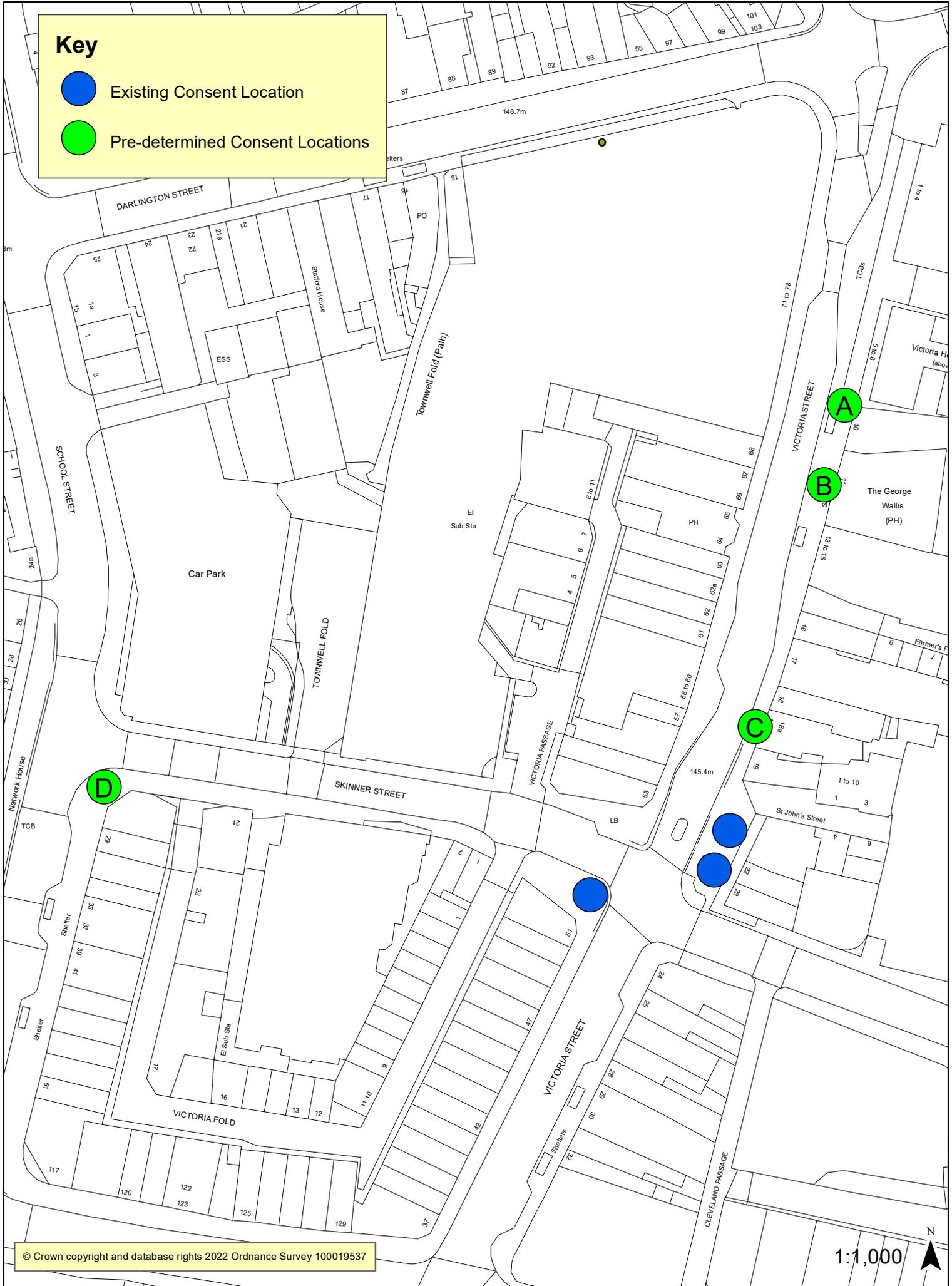
Location A	
Yes	33%
No	67%
Location B	
Yes	33%
No	67%
Location C	
Yes	33%
No	67%
Location D	
Yes	33%
No	67%

Responses naturally expressed concerns over other competing businesses. Current lack of footfall in the city caused concern that additional permanent trading pitches would have an adverse effect on existing businesses.

One response suggested using the pitches as evening consents.

Key

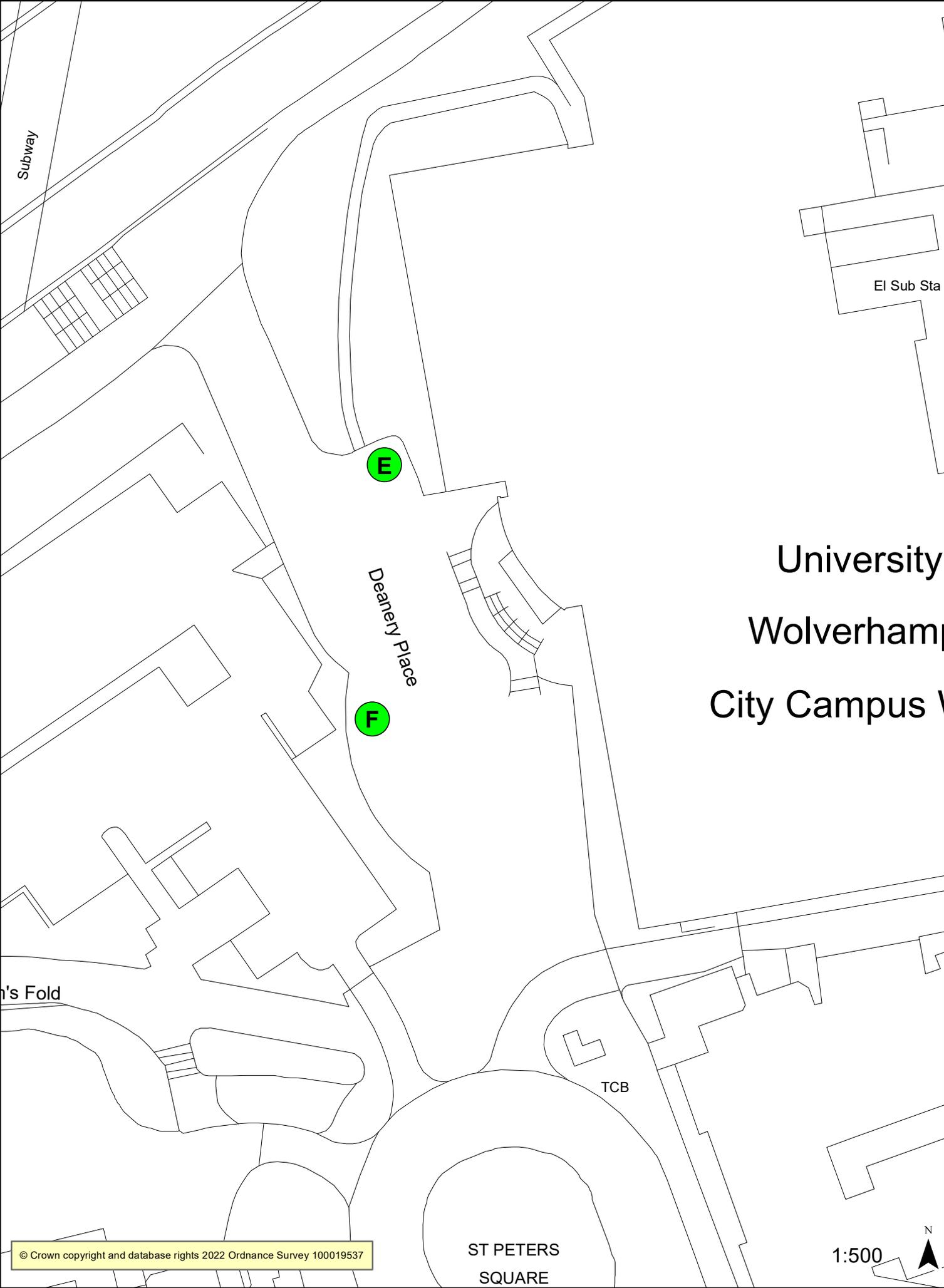
-  Existing Consent Location
-  Pre-determined Consent Locations



2. Do you think there should be pre-determined consent locations on Deanery Place (locations labelled E – F [on the accompanying map])? If you have answered No for any location, please tell us why, clearly indicating the location reference in your response:

Location E	
Yes	67%
No	33%
Location F	
Yes	67%
No	33%

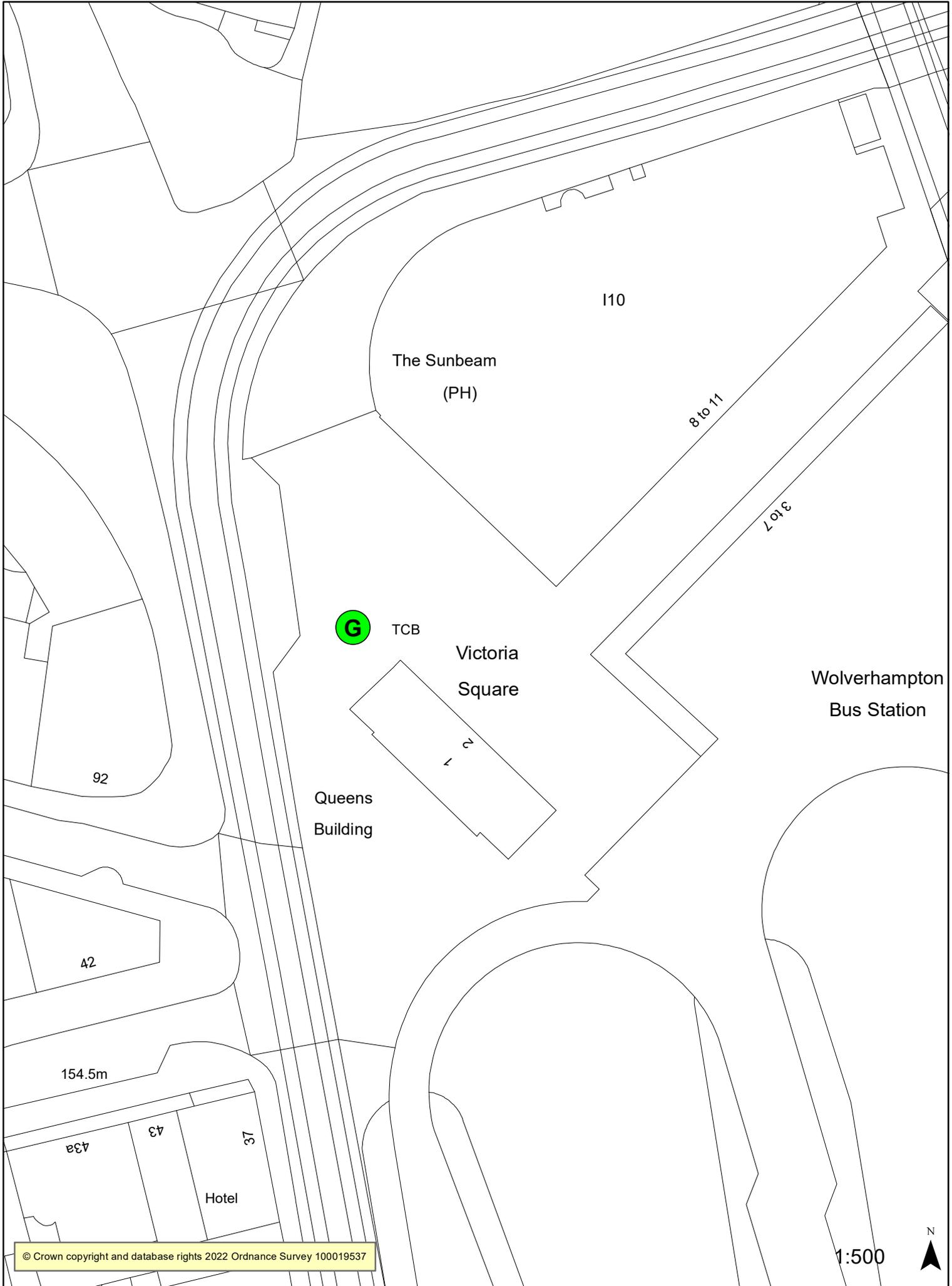
While it was generally supported, it was raised that the pitch being nearer to the subway on match days may help footfall.



3. Do you think there should be pre-determined consent locations on Pipers Row (location labelled G [on the accompanying map])? If you have answered No for any location, please tell us why, clearly indicating the location reference in your response:

Location G	
Yes	50%
No	50%

Concerns raised around potential effects on existing businesses already affected by roadworks. Others noted there was previously a consent in this area and this permits it to return.



4. Do you have any other comments about the proposed pre-determined consent locations that you would like to add?

Yes	83%
No	17%

Concerns raised over the effect the proposed consent locations may have on their businesses.

End Survey.