

Appendix A – With Comments

Date received	From Whom	Comment	Change to Policy required
13.04.2024	Robert Grinter	Is there evidence that the situation on the ground calls for such a daunting array of regulation?	Street Trading regulations are already in force. The policy merely states how ECC will implement the existing regulations and ensure the policy remains fit for purpose as we move towards ECC's stated desire of being Net Zero by 2023
21.03.2024	Flour and Flame	<p>Thanks for this. We broadly agree with all of the updates.</p> <p>Sorry if I missed it in the policy but I think you could go further with waste management systems and enforce compostable or recyclable materials be used to contain any takeaways. There are also many options for food waste disposal which would surely go towards achieving net zero by 2030 which could be applied to street traders / all food outlets.</p>	Members to consider whether to add a condition to street trading consents in relation to the use of compostable and recyclable containers to strengthen 6.10.2
25.03.2024	The Creperie	<p>I have been happily making and selling crepes in Castle Street since 1989. I do have a few comments to contribute to this consultation insofar as it affects our little area.</p> <p>My main concern is that, throughout this time, there has been a worrying lack of continuity in the administration of our little enclave. Decisions are made and then not passed on to subsequent licensing officers or councillors. I would like this to be addressed.</p> <p>I pushed, many years ago, for there to be a mandatory ban on the use of diesel generators. This was initially turned down (late 1990s), then verbally agreed (early 2000s), then agreed in writing (2015,2016), then again in writing (Feb 2019), then probably agreed (conversation with Nigel Marston). What is the policy here and can this be recorded and passed on to any new officers/councillors. Surely by now we can agree that belching out carcinogenic particles in an area where people like to relax and spend time is totally unreasonable.</p>	Covered in the policy at 6.5

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		<p>An application was made, some years ago, for Indian Street Food. I discovered that the application was for dosas - an Indian rice pancake. I made Lee Staples, the then head of licensing, aware of this and he ensured that dosas were removed from the application. Has this been recorded for any future applications? Surely not good either for me or the City Centre to duplicate food in this way.</p> <p>When new applications are made could it be mandatory for the existing outlets to be consulted? And in good time? This has certainly not been the case hitherto. Having this as a compulsory requirement would avoid the unfortunate incidents above and also, possibly, having seen a succession of outlets fail over the years (as was pretty obvious before they started) our comments could be useful. It is absolutely in everyone's interest to have good quality, well-presented outlets in our area that contribute something positive and different to city centre life.</p> <p>When I started in 1989 it was made clear to me that Council policy was to have affordable food in the City Centre, with outlets run by local people, not chains. Can we be reassured that this preference for local, independent businesses form part of the official policy.</p> <p>I don't have many comments to make about the specific areas outlined in your email:</p> <p>Points e and g. I used to have a solar panel which helped charge the batteries which run my fridge and lights. It would not be possible to run my crepe machines in this manner.. I would always need to use gas. Zero emissions great but I would like to see the caveat inserted 'where possible'.</p> <p>Point c. A gas safety certificate is already a mandatory requirement and is checked when we have our Food Safety inspection</p> <p>Point i. Yes, please ensure that all outlets provide a bin and that this is available for customers to use THROUGHOUT the day, not just now and then!</p>	<p>Covered in the policy at 6.10</p> <p>Covered in 7.1.1</p> <p>Covered in 15.7.4</p> <p>Covered in 15..9.2</p>
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		I am in broad agreement with all the points mentioned and thank you for giving me the chance to make my views known. Please keep me informed of any relevant developments.	
24.05.2024	Jane Brandon	<p>I am broadly in agreement with the draft policy with the exception of the following proposed changes:</p> <p>(a) mandatory requirement for DBS checks on applicants and staff - this is unnecessary and over the top. Staff working in street trading/catering rarely interact with children or vulnerable people on their own. I would suggest this is only necessary for establishments that are working near schools or in rural areas where customers are more isolated.</p> <p>(c) All trading establishments have to have annual gas and electrical safety checks to adhere with their insurance requirements and many will also have to adhere to them as part of the private rental agreement if they are on private land (as we do from Retail Concessions who act on behalf of B&Q plc). You could ask for copies of these annually at the annual licence renewal?</p> <p>(e) and (g) emissions standards and power sources - how on earth is any street trader supposed to be zero emissions by 2030? By their very nature of being 'street traders' the vast majority rely on petrol/diesel or gas generators to operate without a mains electricity connection. I can't see solar panels generating anywhere near enough power to support cooking, refrigeration and hot water supplies. This is absolutely unachievable unless mains power supplies are provided to all street trading locations.</p>	<p>Members to make a decision on this point.</p> <p>Covered in 15.7.4</p> <p>The Council has set clear aspirations to become Net Zero by 2030. Industrial rechargeable battery packs are already available and can also be connected to solar panels. No change to policy required.</p>

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<p>31.05.2024</p>	<p>Refuel</p>	<p>Having reviewed the Draft Street Trading Policy I believe it is very long winded and does not lend itself to the roving / mobile street trader. It feels like roving traders have been bolted on to this policy as prior to November 2022 we were allowed to operate without licences. I agree that we should comply with obtaining a licence as it is a way of regulating this industry and ensuring only legitimate businesses are trading. Likewise I can not understand why if a business has requested a food hygiene rating there isn't an immediate referral to the licensing department if they are operating outside of a premises, I.e. street trading.</p> <p>Mobile / roving traders and static street traders are completely different entities. A mobile / roving trader will have a premises and staff with all the accompanying rent, rates, bills and costs. Therefore there should be a different pricing structure to reflect this as a static trader's fee is effectively rent for their pitch. The majority of the other councils in the South West charge a fraction of the cost, compared to Exeter City Council, for a street traders licence for a roving trader.</p> <p>I feel that there should be a street traders association where we have the opportunity to be consulted and have a direct line of communication with the council on these matters.</p>	<p>Roving traders have always been covered by the Street Trading Policy. The business may not trade in our area. We have many mobile business that are required to register as Exeter is there home address. However they do not trade in Exeter or indeed only trade at events where a Street Trading Consent is not required.</p> <p>Fees were changed in 2024 to reflect this. A mobile trader pays the same as any other street trader and then £200 per each additional unit they operate.</p> <p>This would be for the traders to set up.</p>
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