

APPENDIX 11

<u>Answer- Question 1 Who are you -other</u>
customer
Business consultant to existing trader
A friend of a trader
Relative of a street trader
I work in Birmingham City Centre
I have family who are traders
Member of the Public
Shopper
Street food
cllr
Customer of street traders
I am a University researcher whose work includes trading and local governments' policies
I work in Birmingham
I grew up in the city and now work here
Visitor to the area
<u>Answer - Question 3 Disagree with prohibited streets</u>
Street traders are what make Birmingham - Birmingham. Without them tourists and people from outside Birmingham would not get to meet real Brummies. They add a sense of locality and provide a real personal service. By doing this, you're allowing the big commercials to take over a great city for financial gain
Red routes are prohibited enough for vehicles. If you stop pedestrians being able to buy food from street vendors too this is restricting choice for people who choose to reduce pollution by opting to travel via public transport.
Street trading still needed and businesses will not survive if street trading prohibited

As long as a street trader is not in the way of the metro tram, or is not obstructing traffic on a red route, they should be allowed to trade

because some street traders have been there for years

As a growing and improving city I feel that it's essential to offer visitors and locals the chance to roam and purchase what's on offer.

Having street traders around the metro line, particularly around the stops would be beneficial not only to the traders but also travellers. It would certainly enhance the experience providing an interesting view rather than plain footpaths.

We are unable to move our unit without it being craned in!!! Removing it daily is an impossibility!! This should not happen you are taking away livelihoods

Although I agree that there should be a restriction on the number of trader's and stalls sizes on the types of routes mentioned I don't agree with the introduction of prohibited Streets as this would (a) have a detrimental effect on on existing trader's many of which have been trading from these locations for decades and have built up a loyal customer base and it could inadvertently risk the loss of character that these traders bring to the city

I visit the city centre monthly and at no time have I ever thought the stalls/street traders have been a nuisance or are inappropriate. I often think the religious folk are a pain, so loud and monotonous, but the stalls with bags, scarves, souvenirs are fine. The metro might need a rethink, the traders were and have been here for centuries and yes, time marches on, but as proved by Manzoni, not every change is to the good.

It can potentially take away the livelihood of hard-working people who may have had their business on a red route/ metro route for decades.

Once you tick disagree it asks you why I think a fairer outcome would be to give existing traders chance to run with rules and kick them off if they don't follow.
Trade in all areas is very important
If the trader is not in the way of the tram, trading should still be allowed. Red routes can accommodate a trader away from the path of traffic
Fundamentally street trading has been a part of Birmingham centre long before the proposed changes and is essential to maintaining the identity and character of our great city
Because this will potentially put some street traders out of business
I feel this will wrongly impact the life of hard working street traders, making it a lot harder for them to run there businesses which have been part of Birmingham for decades.
Because street traders will be effected
<p>I believe that the community shared by street traders benefits not only the local economy, but also the day to day lives of those passing through town every day.</p> <p>We are already losing our markets, a lot of these traders have struggled against big companies like primark for years, and remain. In my opinion that is a testament to them and their importance to the people of Birmingham.</p> <p>To cut this will make Birmingham even more of a faceless heartless concrete jungle that is slowly becoming. The German market continues every year, and that causes nothing but trouble in the city but boosts the economy.</p> <p>Our street traders are often family businesses just trying to make an honest living, they should be afforded every opportunity to remain in the locations they are in now and continue to prosper.</p>
I don't see why people can't trade on these routes if they already are? It does not seem to be an issue to consumers. Having traders on red routes etc.. allow people walking these routes to purchase goods
If they are not causing an obstruction then I don't see why you should take people's lively hoods away.
They're part of Birmingham- let them remain! Keep out history and keep them in a place people will access.... let's stop killing our high streets and local tradesman

*The well established business that have made and give Birmingham residence and the public the diversity that makes it stand out. These businesses bring Birmingham as a whole together. This will take away earning for people that have worked for the Birmingham community and made this city better for decades. This is the hussle of Birmingham streets and the metro should work around/ with not take over and distroy!
Because the street traders have been there ally life and bring trade to the city
Traders operate on those streets and will be forced elsewhere affecting their livelihoods. Also I like the market traders I currently use and they are all within walking distance. This would make it more difficult.
If the unit there is shall ie no bigger than existing street furniture then don't see a problem,if trader must be moved then reasonable relocation to a comparable site MUST be sought.
Traders are there to earn a living they should have the same rights as a shop. Leave them alone and let them earn an honest wage
<p>People have done this job for years</p> <p>Why would you take it away from them</p> <p>Make more families turn to universal credit because they no other way to work than being a street vender</p>
Because it's apart of the Birmingham community
Closing of street traders that have traded without issue for over 20 years some which some of which are cornerstones of the community they are in.
Some of these street traders have been here for years and so have their families so now the council want to make changes people are yet left suffering because of this. Not everything in Birmingham city centre needs changing in fact you are killing off what we all love about Birmingham
<p>Many of the street traders have been there for years and have a loyal customer base</p> <p>This will seriously affect their livelihoods and put many of them out of work</p>
Street traders should still be able to continue trading and if being made to move this could seriously affect there trading and businesses

<p>I like street vendors</p> <p>A good chum of mine is one</p> <p>His burgers are pukka</p>
There is no where to park in the city as it is and what about the street traders
Markets and market stalls are the hub of the city
<p>Market traders will no longer be able to trade on their current pitches causing loss of regular custom and consequently their jobs , and livelihoods .</p> <p>The regular traders are a point of social contact for a lot of vulnerable and lonely people such as the elderly and homeless . For some of these people , they are the only friendly faces they see.</p> <p>The loss of the traders will really impact on the community spirit .</p> <p>Some people rely on the affordable prices that the street traders offer , that cannot be matched elsewhere , this will have an impact on other people's lives financially .</p> <p>Tourists are drawn to the street traders and are part of Birmingham's culture and cultural capital, as well as being part of the history that brings people to the city . I think this will have a massive impact on tourism . If traders have to remove their pitches at the end of each day you are expecting them to work longer hours and there will be an increase in carbon footprint as they will bring in vehicles more frequently .</p>
Little problem with the way the majority of the long running and well established businesses there run already
I disagree with the proposed effect it will have, I believe it will have a negative impact on the city.
It causes traffic and chaos and each street should be free for everyone to use as they wish
It's making it difficult to move around unless you on the metro and to be honest how many cars are you taking off the road by extending the Metro line from SnowHill to 5 ways? Answer Non, that extension it to stop people walking and get lazy!
I am in favour of and support street trade.
It will put many existing traders out of work.The proposed policy has not been thought out properly.It will increase the costs of having to reapply every year with no certainty of trade.
Street Traders deserve a chance, let them keep their businesses and livelihoods.
Not fair for people who already have licenses

It's not fair on current traders. Other people in other professions wouldn't have to keep reapplying for their job.
There are traders that have been in business for over 40 years on such routes and to stop them would be unfair it is their lively hood
It means no food stalls which have provided people with fantastic food over the years
Surely there is better things Birmingham Council can be spending their money on
I work in the city centre and need access
Not filled in
People should be able to walk around the city centre freely, rather than all the restrictions.
I understand that mobile food vendors who trade in Birmingham and have done for years will lose their pitches and therefore their livelihoods. As a resident and employed in the city I currently enjoy easy access to a great variety of street food and this enhances workers and residents and visitors choice, both dietary and economically. As a diverse city we need to retain these facilities not remove them.
There is a hotdog stall on Broad Street which I don't want to loose
Traders have been there well before the metro/ trams were even thought about. It will effect their livelihood.
Because it affects the businesses that operate in those area, it will create less foot fall and increase the traffic.
Also terrible for those times you need taxis through the area or parking in the town car parks.
<u>Answer- Question 5 Disagree with three types of consent</u>
Street trading provides no benefit for town centres; it takes trade away from existing rate and levy paying businesses and is an eyesore. Furthermore traders appear who have no proof of approval and we have no power to move them on. We have empty shop units in our centre and annual consent traders should be encouraged to take one of those, thus paying rates and BID levy
I think granting consent for occasional trading is a good idea. I think it is unreasonable to expect traders on a yearly consent to have to reapply every year. You would not think it was acceptable to apply for your job every year. Traders would be unable to apply for finance or mortgages on these terms.

Occasional consents allows people to trade that may not have the correct health and safety docs in place
<p>It is not fair that street traders have to reapply for licenses each year. This removes all security from the business, how is a trader supposed to invest in a business that may be removed in 12 months. How is he supposed to get a mortgage or any sort of finance? Under what circumstances would a person have to reapply every year for any job?</p> <p>It is unfair that under your proposals the current traders will face unfair competition from traders who are only there for the short term. I have traded and built up goodwill and reputation in my business for 30 years, now I will face competition from carpetbaggers who are here today and gone tomorrow.</p> <p>We have invested ourselves in our business and in this town, the council has profited from that and must protect its traders and their livelihood.</p> <p>From what I understand of your proposal I should maintain my position all year so that the council can allow casual traders to stand within a stone's throw with the same stock during the busy xmas period. This is ridiculous, unjust and unworkable.</p>
The traders already take over the pavement you cannot even get past walking through is a nightmare. Also the rubbish that is left behind they do not clean up after their selves.
THERE WILL BE NO CUSTOMERS, BECAUSE NO ONE WILL VISIT BIRMINGHAM AFTER THE BANNING OF CARS
the people who have traded for 20 plus years should be given a open licence
I believe that long standing street traders deserve and require more stability in the knowledge they have more than a 1 year license to trade. If they are to invest and develop in it for business and further enhance the community they require more than a one year plan
You are contradicting your clean air zone proposals by introducing mobile traders. Why would you want to encourage traders to have to drive in to the city centre, when they needn't do so at present?
I have a catering trailer at 5 ways which cannot be used. I will lose my business and income. This cannot go ahead
If the site has always been left there and then it was told it has to now leave every night and come back every morning this will cause more pollution to the centre and added cost and time for the trader

i don't believe this is fair that traders who have been in a particular position for many years should be forced to move when they have a regular clientele. it also leaves the way wide open for corruption if at any point there are corrupt council employees who can profit personally by allowing someone to take over over a pitch which has been occupied by a trader for many years and has built up goodwill with a regular clientele. thus any new trader put in that position benefits from this goodwill without having paid the outgoing trader for this.

I have been trying to get Street Trading Licence for over 6 years.
Every time my application get rejected before even the officers know what the business trading.

I am planning to have one meter or two meter square to my mobile catering bike.
It's a totally new business in the UK and probably going to be a successful small business across the country. More details available by contact me at nemer_alshareef@yahoo.com.

All I need it's about one meter square anywhere in public busy footpath.

This can prevent street traders from investing in their business and improving it, as there is no guarantee that they will be allowed to trade the following year so there is no job security, so spending money on the business would be a huge gamble.

The traders that's worked in the area all their life

Occasional at one off events yes but for traders who have been trading for years to suddenly have their livelihoods ripped from them is shocking. As someone born in the cotswolds and moved here 10 years ago I feel the traders offer so much to Birmingham's visitors, Birmingham without the market trade and hotdog Van's is not Birmingham. If a trader was to rent a building owned by the council will the same rules apply to them also?

I fear that street traders are being forced out of our city and there is no need for such a change

If a trader has been the right to trade, the trader should not have to re-apply for his/her own pitch

This will have a double edged negative affect.

1) Occasional and mobile consent to pitches loses the familiarity and relationship building provided by established traders.

2) Could be used as a back door to ensure large corporates dominate street pitches during key times, again totally detrimental to the shopping experience and identity of Birmingham

I would want the enforcement to be stronger than at present and these more occasional ones would be fine if subject to the same criteria and checked and action taken if not complying. We have millions of customers in our city every year and we just look like we have no control at present!

It's overly bureaucratic

The street consents should be a rolling 12 month as they have always been

I think it is unfair to introduce these restrictions and make it harder for street traders to make a living.

I disagree If it means regular traders can't trade, if it was a case of placing new/occasional traders in other places than that is not a problem. I don't see why your not putting this time and effort into the bull ring markets. If you promoted the markets done a rent free period and advertised it properly then all these traders who are applying could go down there.

It's fiat for the traders that have been there all my life and when I working in the town centre as security manager

Providing they are new licence es and not replacing existing ones.

Because it affects the real street traders

Same as previous question

A lot of the street traders have been there for many years

The people who have established trading and stalls should be allowed to continue with trading without others being able to purchase temp license which could affect their business if you paying annually this would show commitment to the trade no just temporary license which could impact on long term traders

There seems to be favouritism, towards seasonal traders such as the German market, which takes away from all year round traders, such as rag market and fish market Traders get no promotional help during the festive season, these are the traders who invest the year with there time and hardwork, paying rent and many paying business rates, then during the most important trading time of the get the spot light given to casual traders who contribute way less
Leave the stalls that are already in town alone these stalls make the city occasional and mobile consents will not work you need local people
<p>Because you will only get occasional traders and not the regular traders who bring in the tourism and economy into the city .</p> <p>All those traders that have been adding to the economy and community spirit for years and years will be penalised .</p> <p>You won't get regular custom with occasional trade. People won't come into Birmingham city centre as frequently.</p> <p>Traders should have their regular pitches that they have developed and built up over many years . They won't be easily found , customers will give up looking causing over all impact on economy and livelihoods .</p>
Less control for council over what is happening. Traders care more when they are long term
The negative impact this will have on long term traders and the local economy
I love the street traders and purchase from them on most days that im at work. They always have long queues and are doing well and are popular and friendly
Because if a trader has been granted a licence they shouldn't have to renew for another 5/10 years unless they break the law etc. We need these independent traders it's important to local economy that we have a mix of all business.
The current vendors provide a great service and unless there are health issues involved why is the council making things difficult?? Is this another way to fleece hard working people of Birmingham??
I don't reapply for my job annually why should they? Consents as currently managed do not require changing in my opinion.
Introduces more bureaucracy more costs more time to be spent on applications.
Would this not deter street vendors from applying and having a variety of vendors available to us as residents? I think it would make it harder for smaller businesses to gain access onto the market of street vendors.

Why start this now, traders have been treating birmingham council fairly for many years. No need to tarnish their reputations now.
Traders who have held pitches for over 20 years stand to lose their livelihood through increased competition.
Not fair for people who already have licenses
Lively hood at risk and cultural Birmingham disappearing
It's not fair on current traders.
Putting blocks on long established traders , bringing anxiety and instability to their lives
Why would you have to apply annuay people. Do not apply for their jobs annually
Why should someone keep applying year to trade. When they have been there for a number of years before.
Should not need additional consent when you have had a license for over 30 years
Traders who have been doing this for years do not need to have additional regulations added to them
These pitches where people work are their lives and their income. You would not expect normal people to apply for their jobs each year would you?
I think things work very well as they are with street food. What you should be looking at is removing the very vocal and loud religious stalls in the city and ensure the volume is restricted at the very least. They are contributing to noise pollution.
Traders have trader in the same location for many years, traders have respect for each other business and location. Introducing the new rules will causes issues between traders and effect livelihood.
There are local businesses, which have been operating for decades based on regular customers and clientele. Taking that away increases the volatility of the market, and impacts the businesses.
I've been a regular customer at many of these stalls, and you're taking away livelihoods. It's unfair to make them pay to keep their places annually.
The stalls are people's livlihoods and some have been trading for over 30 years. They are part of the community and it would be devastating to lose them
<u>Answer - Question 7 Disagree with 6 week application window</u>

Not long enough
Surely affair a system would be offering the existing holders of the consents the option to take up their pitches with the new rules considering some traders have traded it between 20 and 30 years and you could in theory be dismantling the business and a customer base that that that I have worked hard to build .But obviously under the new guidelines that you are looking to introduce if they do not wish to adhere to the new rules then quite rightlyThey have no rights to the pitch.
Current traders should be allowed to continue as long as they follow council guidelines. I don't think anyone would like current traders income to be taken away unnecessarily. The council needs to work together with small traders and support each other.
<p>I feel that if existing traders wish to continue trading on their current pitch they should be given first option.</p> <p>Whilst I understand there may or may not be some changes required to comply with the updated rules the current trader/s may need a certain timeframe to complete any changes that are needed, ie trailer to a specific size which has to be authorised by yourselves so if I needed to purchase a new one I can't just go to tesco and buy one off the shelf I have to get the agreement from you this to me is somewhat confusing as I can't go and buy one because if it is wrong I can't take it back ,so I feel some more detailed guidelines are required for this.</p> <p>Also some traders may have been trading for a good while and this maybe their only source of income and if they are not successful in reacquiring their current pitch this could lead to their loss of income, further job losses for the staff that are employed, possible loss of homes due to no income.</p>
I agree in principle to any prospective traders. Existing traders should have a rolling contact.
The street traders that built their livelihood on street trading in Birmingham should be taken in to consideration. Theyve paid their business rates and taxes for many years.

<p>Current traders should not have to reapply for consents.</p> <p>Consents have already been granted and have not been withdrawn.</p> <p>Under the current policy, the trader would have to commit some offense for his license to be withdrawn.</p> <p>I have done nothing wrong, under these proposals you are wholesale taking the livelihoods of people who have invested in their business. You then intend for those traders to get inline with every other tom dick or harry, who feels he would like to take my business from me?</p> <p>This is outrageous and unfair.</p> <p>Why do current traders have to forfeit their business's for you to reform, traders have been asking for reform for years.</p>
6 weeks is not enough time
Existing traders should not have to re-apply for their trading positions
Have you seen the state off the road from stratford road Springfield road junction. It's a shambles rubbish. People stopping in the middle off the road. It is a dangerous hazardous section of the road. All the way to sparkhill park.
The present traders should be given one to meetings and points concerned raised with them : especially if these traders have been at a location longer than say 3 years this is there living and they have a right to be heard and consulted with
I think that this is a good idea for all new traders, however I dont feel this is justified for existing traders, thay have been trading for some time as they are having to compete for their own established business
Existing long standing pitches should not be included and continue to be licensed for that pitch
Traders that have been trading for over 15 years should have the right to continue. they have regular income from this and a loyal customer base and are part of the community of birmingham city centre. stop turfing out people who rely on this. new isn't always better. This is peoples livelihoods.
Don't you already approve consents? Why would make traders re-apply if you have already recently approved?
Things are perfectly fine as they are what's the point of changing it just to line the pockets of big businesses
If a trader has had the same site for years it should not be offered to another trader unless the first one gave it up. I think this is what the question was as it was worded so badly
It should be offered to those traders who have been trading there in the past

Surely current street traders should be given priority to continue trading from a location if they wish to continue with any new rules/regulations being brought in.
it would be fairer to allow existing long term traders the first option for the pitch, if they have a good standing and no outstanding issues
Nobody who currently has a street trading pitch should be forced off of their pitch, unless they break the rules of the new policy after it is introduced.
I think traders that have been there for a set amount of time should have 1 choice over new traders
I disagree as I believe existing traders should first be given opportunity to apply before other applications are considered.
Someone's whose worked for numerous years could lose their livelihood totally unfair
Long standing traders should be allowed to run their business and have 1st option on position as long as they follow the rules
existing traders have been there for years and have built up a growing customer service they have made friends and loyal customers always come back for good service and quality food change is good for some people but it doesn't always work leave the traders who have made a success of their business and who will be greatly missed if removed
Current traders should have their applications considered first , otherwise reliable services and vendors that are popular and well known will be lost to the public if their normal licensed location is given to another applicant in a free for all.
6 weeks may not be long enough for traders to respond to requests.
All present traders should be allowed to stay on their pitch. I don't think they should have to apply for a site they've been on for years. and if they don't like new rules then kick them off site. That's the only right way to do it
I feel it is morally wrong to allow another trader to walk in and take someone's pitch putting them out of a job, there surely has to be a better solution? Surely if rules are set out and traders follow them and health and safety and food hygiene standards are adhered to then original pitchers should be renewed first. If rules broken or food/health laws not followed then yes open for others to apply

I feel very strongly that traders that have had pitches for many years in and around this city, and have not flouted any of your rules and regulations, should have to fight to remain in their current pitches. These traders have devoted their whole lives to earning a living in this city, some giving 40 years of service to the residents, and visitors alike. I hope you consider my thoughts along with other residents of this city.

Why should interested traders be allowed to pitch for a site that a trader has occupied for years? The trader in place should get priority.

First choice should be given to existing traders

I don't believe this method would be fair to street traders who have already been trading for a long period of time, to have to reapply for their existing and already established plot, which could result in them losing it to a new applicant and therefore have to move to a new position/plot/area to the detriment of the business which they've previously established.

I believe the preference should be given to the traders who already have pitches. These traders will have invested in their equipment, perhaps taken business loans and to move the goalposts and then make them all apply will have the potential to bankrupt some of these people. Pre-existing conditions should apply to existing consent holders and the new conditions should apply to new consent holders from the launch of the new policy.

I have been trading at Aston Villa match days with my mobile catering unit for 40 plus years

I don't think it's fair that someone else can take my pitch when I have been a good trader for all these years and never had a complaint or problem at all. My units all have 5 star rating the top Hygiene certificates gas and Electric test. Certificates in passing fire extinguisher courses

There is a lot of Rogue traders that won't meet this criteria

I think a fair way would be for the existing. Traders that have been there for years to be allowed to apply first before any of the newcomers if they don't. I wish to apply if they don't wish to apply then that's fair enough let one of the new Traders who want to trade there have the pitch but I think they should be given the first opportunity before anybody else.

I've been on my pitch for 30 years to allow someone to come along and apply for mine and my father's pitch in a 6 week window is appalling, those pitches are our main source of income.

Whatever policies are settled on all existing traders should receive indefinite grandfather rights to their existing pitches under their existing terms.

Because Birmingham's established street traders should not have to apply for their locations that some have been trading from for 30 years +
I believe that this will cause undue stress and concern in that time frame, whilst people who have often worked alongside each other for years become in competition to get optimum locations.
They have been there years, bringing custom to the high streets in the city, they are part of the history, why now take that away?! Why now make the years that they have put in have to be fought for!?
Find something else to fix in the city there are plenty of other areas needing attention, or are you just trying to create problems that aren't there to validate your existence.
This is the way u are stopping trade in the city centre
All current traders should not have to reapply
New interested traders should not be allowed to apply for existing trader's locations, unless serious problems have occurred with an existing trader.
Allow traders that have been there for extended periods to retain their plots
When someone has been trading for many years and have loyal customers and no trouble it doesn't seem fair they should be fighting against others to maintain their livelihoods
<p>I know a trader the devil's kitchen on Kent street off Hurst street ..he has been there best part of 20 years providing a safe area for the gay community,</p> <p>As if he moves from that spot we are pushed towards dangerous places in the area I know this because I live in the city centre B1</p> <p>It's not so safe going to regular food outlets .</p> <p>Try changing that before you move things that are totally working.</p>
Trader should just be left to trade as they always have some of them have been there for 30 years
<p>Respect and priority should be given to long term existing traders with regular pitches .</p> <p>Face to face conversations and agreements made .</p>
It seems just a way to remove current traders without real justification

I believe existing long term traders should be given the first choice to trade and if they don't adhere to council standards to be removed. Some traders have worked there a really long time and worked very hard to have the standards they do
The street traders are a downmarket eyesore and should be removed in my view
Those that already have a licence shouldn't have to re-apply only new traders. Old traders should be allowed to continue to trade
Why can't you leave the current traders where they are and earn a living??
It is assuming that the new policy will be successfully introduced.
Shouldn't need to re-apply for something they have been doing for years.
Not fair on current traders
Livelihood at risk and risk of losing cultural Birmingham
Not fair on people who have been working there for years and built up a clientele.
Again why auction off these sites when people have used them for so many years and should be entitled to them
Some traders have built up the own customer base there and their customer know where there are. So why should they be moved on after so long and all the hard work they have put in over their years
The same reason as for the question before
Why should the traders that have been there for years even decades to have to show 6 week open. Some traders have been there for years they should not be going through this.
People/traders should not have to re-apply for a job. The public want consistency not a different stall every 6 weeks
Is 6 weeks long enough? Why should long standing vendors have to re-apply?
Should be left as it is
Because once a licence is granted, it should be retained. It's an unfair process and is just another money making scheme for the council.
<u>Answer - Question 9 Disagree with consent considerations</u>

Why change things for the sake of change??? Leave things as they are. Policy gone mad.
This policy is very detrimental to small independent businesses
Any more trading of fast food or street trading will bring in more mess rubbish and vermin. They need to put a stop and concentrate on the ones that are there. Identify who is leaving the mess on the road it's a health hazard walking there.
Street traders are what Birmingham has been known for for years. Trailers cannot be moved it's ridiculous
Small business add character and differentiate to standardised city centres. Instead of pushing for unworkable and expensive changes for the small business, maybe work a day and see how much effort goes into the process, quite often for little reward. Delivery company restrictions for small businesses will add many unproductive hours and make independent business unprofitable. Focus should be on filling all shops and workable improvements, delivery until 10am for example, less preachers and chuggers!
All the council wants to do is deliberately get rid of street hard working independent traditional street trader's who like there predecessors have been the backbone of trade in Birmingham for 100s of years without them and the other men and women of this fine city of that was once famously known as the 'City of a Thousand Trades' we should be proud of these traders and supporting them and not trying to bulldoze them away like we've been to Birmingham's history of decade's
No one should be forced out of work
Consultation should be longer and you should show your research and thinking about changing the processes etc.
They're not considering present traders
It is unfair to those in place and following rules. Businesses locally are struggling as it is and this council wants to potentially take what little they do get from them by throwing the off?
the conditions are too stringent
I agree with most of the considerations, however I find the considerations listed under "suitability of the trading unit" to be a bit subjective (I mean, who decides if it "adds to the quality of the street scene"?!!) I also think it's important to note that these considerations should apply to new traders but those holding existing consents should be allowed to trade under the previous conditions, until such a time as they give up their pitches - remember, these people invested in their units in good faith and it's completely unfair to move the goalposts.
I disagree that you can take my livelihood off me when I have been trading there for 40 years plus

It's mostly arse covering waffle
I disagree that for 100 years it was ok but now some bright spark in suit has decided it's not fit for purpose!?! But it was for 100 years!
Unsure as to what they are. Normal people without a vested interest in street trading are not going to bother looking them up.
Like the old saying if it ain't broke don't fix it Many street traders could lose their businesses and end up unemployed even losing their homes Some have been on their sites for many years and this could be the end them
If anyone can apply in a short window with no real commitment to trading this could affect other trading businesses
Shame how you move long lasting businesses without thought to what happens to the community when that service has been removed .
I change something that already works
The street traders are part of Birmingham and this legislation will mean they may no longer be able to trade. Id rather go to the street traders than a high street store like Gregg's or Starbucks
<p>There are parts of the Key considerations that in my understanding seem developed to discourage street trading activities or the application for a street trading licence.</p> <p>For instance, within the sub-section called 'Prevention of nuisance' it is mentioned that 'activities at the pitch must not cause a nuisance, annoyance, or disturbance to neighbouring properties, this includes businesses'. In my understanding, if a street trading unit is placed in a commercial street like High Street or New Street, in the centre of Birmingham, big shops like Primark or other similar businesses will be given the right to complain to the council about the unit's presence. The 'council is duty bound to investigate', (with no criteria listed) - it is all very subjective, and according to the text, sounds like tending to be harsh on the traders, so not impartial.</p> <p>The following criteria, 'suitability of the applicant', again, makes no positive reference to the profile of the applicant. It is all about criminal conviction or the payment of fees accordingly. But no e.g. consideration of the history of trading at a specific spot ('seniority') to guarantee the continuation of that business or maintenance of livelihoods of current traders.</p>

Within the 'suitability of the trading unit', item 1 and item 5 seem to be conflictive, implying that if the trader invest in a 'new unit', it might have a short useful life, since the 'design brief will be kept under review'.

The conditions within 'Advertisement' are also quite restrictive.

The comments of the section 'Selling the right goods' puts a statement that strongly implies that the council considers street trading a 'inferior' activity when compared to fixed retail businesses, presenting a rather exclusionary mindset.

This in my understanding clashes with the values stated in the introduction:

'street trading can aid the local economy and contribute to the facilities offered to people who visit, live and work in Birmingham and it supports the Birmingham City Council's priorities:

- a) Birmingham is an entrepreneurial city to learn, work and invest in;
- b) Birmingham is a great city to live in;'

Last, but not least, having visited the city centre during last Christmas time, I have seen (and been trapped) in the Frankfurt Christmas Market, a massive structure with a lot of impact on the flux of people, their mobility, because of the noise and the smells of the event. Nevertheless, the council seems to have a very positive attitude towards the establishment of such huge market for some two months. I wonder if its' presence is justifiable on the basis of the 'tourists or economic activity' it is claimed the Christmas market attract. Even if so, the presence of such market sounds at odds to what I read as expected/ wanted in Birmingham's streets according to the street trading policy drafted here.

(I will make a more comprehensive explanation of my understanding of the policy at the end)

As they not fair to the old traders who been trading for a long time

As previously states

They take no account of the impact on existing traders.

Not relevant

Not fair for current traders

Livelihood and cultural Birmingham at risk
Not fair on current traders. They shouldn't be treated differently in comparison to other people in different professions.
This again makes it difficult for traders
Why change something that aint causing any harm to anyone.
As answered earlier
Should leave it as it has been running for the past 40 odd years
I support ling standing street vendors right to continue to trade and continue to offer a valued service to residents & workers.
Why does trader have to justify they are worthy of trading when they have been for many years
<u>Answer - Question 11 Disagree with Food Hygiene Rating Requirement</u>
It should be the same as for fixed/shop based traders.
All food businesses should be treated the same. If you want to close street stalls with ratings 3 or below then you must do the same with ALL restaurants, cafes, etc too.
I don't think the current guidelines for issuing certain numbers for food business are a fair representation of the food safety of the premises.
The ratings are only an indication of cleanliness on one occasion .
There are occasions operators have had no ratings for admin reasons which is not an indicator of hygiene.
Na
If food street trading should be 4/5 star only all restaurants should be treated the same too
<u>Answer-Question 13 Disagree with introduction of street trading policy</u>

Not sure what's wrong with the current one?
Choice choice choice for the people
Street trading has always been part of the city and this should not be lost
The wording sounds like you are only focusing on upmarket shopping and residential city centre businesses and there are many other locations such as Devils Kitchen in a social area that may not fit with your plans !
It is ridiculous to move trailers each day and so unnecessary!! It's part of Birmingham and has been for many years
As before, many small business need support not more restrictions.
You've got a vision of Birmingham that is clad in glass and chrome. Birmingham isn't that, and never should be. Stop changing things just because you can. Listen to the people who work here, you spoilt the Rag Market and the indoor market, leave it there.
You havnt told use what the current infrastructure is and what enhancements the city has that you want the street trader to follow
there is nothing wrong with the current street trading arrangements - peoples livelihood should not be put at risk by forcing them out of their current spots
Birmingham City Council has had opportunity to promote, manage and enhance our once thriving Wholesale and Rag markets. Evidentially they have proven unable to do this and have instead lead them to a spectacular demise. Staff change constantly at BCC markets department.
There is absolutely no evidence that BCC have the ability or experience to introduce a Policy that will compliment or enhance. This should be trader led by people with relevant experience and council input should be minimal.
You are potentially trying to close down businesses that have been reading for years because you have created a new infrastructure that has not taken them into consideration. If street trading is important to your city then the infrastructure should include them
The custom that the street market has brought in alone is enough to validate their place in this city
It's always done to the favour of the money the council will make. Why does the street trading that's set in place needed changing to start with? All street traders I've come across in Birmingham have kept a clean tidy and friendly environment!

What is wrong with the trading stalls we currently have? The market traders meet my needs.
The policy should offer protection and support to existing traders. It should not allow big retailers in the city centre to influence council decisions or policies.
Not everything needs change a lot of what we have already fits to the old and new Birmingham let us keep some of our past aswell as embracing our new city
Current city infrastructure is a very broad working and if by implying they should comply and be similar with other big retail business this is wrong these are small business which are hard enough to establish and run and should be able to sell what they wish
I likr street vendors
To much red tape as it is high rents smaller space while big cats seem to do what they like
As already stated the majority of street traders already fit in well with what is happening in Birmingham city centre
It has been shown in other towns and cities that if you decrease street trading (which you would if applied the policy) it will have a negative impact on the shops.
Street trading is a tradition and if you compare this to New York, a modern vibrant City, street trading is part of its heritage and fits in with the new and old.
It works as it is for me.
The city council should concentrate on cleaning the streets sorting out the rat problem which exists in large areas.
Haven't had one before so why start now
Na
Not fair on current traders.
Why change a system that works
Why do it now when there has been businesses there for a number of years trading. What difference does it make to council. Its just about making more money for the coucil and the MP's

These traders are associated with events in the city so over Regulation of these traders is not required
Should leave it as it is you are messing with people's livelihoods
Why break something when it isn't fixed. We should be encouraging the variety of smaller street traders in the city when rent and rates costs are restricting smaller retailers. I suggest you visit other large cities, such as Manchester or Liverpool to see how much more vibrant the commercial areas are, without religion being shouted at everyone.
It sounds like the council what to had pick who they want and don't care about all ready establish traders. If your face fits!
Because you're implementing too many rules and legislation and packaging it as something positive for residents to be proud of you. You will guarantee more small traders to close.
<u>Answer - Other comments on proposed policy</u>
Strongly agree that diesel generators should only be used where there is absolutely no alternative due to air quality impacts and noise.
Whilst I can see the need for street traders and concede that occasional events can bring tourism and increased footfall to the city, I also think that there is a case for leaving our wonderful open spaces open for people to walk in without hindrance. The siting of the big wheel etc on top of our new public fountain is, in my opinion, very unfortunate. There are other spaces in the city centre that could accommodate these. The length of New street and increasingly the boulevard leading to St Martins is unpleasantly crowded with stall selling goods which rarely change from year to year. This does not show our city in its best light. Please consider this before granting licenses for existing events or instigating new ones.

We contest the statement that "Street trading can aid the local economy and contribute to the facilities offered to people who visit, live and work in Birmingham...".

How do mobile catering vans that are in position 24/7/365 aid the local economy? They just compete with existing businesses. They provide a small income to the City Council but do not contribute to the BID.

We would also like to see a ramping up of enforcement to tackle operators who just show up without permits (e.g. as shown with Aston Villa Wembley appearances and at Christmas light switch ons).

We should have rules that forces street traders to abide by parking rules, there are a number of traders due to their position on the street, who use loading areas as permanent parking. Pretending to load every time a civil enforcement officer comes by. This significantly reduces loading space for other businesses in the area.

It is important that these street traders abide by rules much as normal retail traders would need to with s landlord, and that they pay as part of their fee for rigorous enforcement.

I visit the city centre regularly. I am an avid shopper. I think the street traders on New Street add to the shopping experience. I have shopped at one particular stall for about 15 years. Many scarfs to show for it. The stalls seem to have been there longer than the shops. The down side to the city centre is the charity collectors who can be quite intimidating.

I think you need to seriously consider the impacts on small business owners and their families. A lot of people rely on street trading as their main source of income. Think of the small people trying to make ends meet by following their passion and setting up small businesses. This is our bread and butter.. literally!

After reading the pdf I would like to know if I have to reapply for my existing pitch that I currently trade on,
Or is it that because I have a pitch currently the rules to which I follow already may need to be adapted accordingly to ensure the needs of the safety of the general public etc to which I already follow at the moment are carried out.
Will I be issued with a new set of rules to follow to comply with by a certain date following the closing of the consultation period in order to retain the current consent.

Secondly have you or can you plan to have a meeting with long standing street trading operators so we can be sure what we need to do in order to retain our pitches which in some cases have been held over 25/30 years.

Just to re emphasise that potentially some long standing businesses could be put to the sword but not offering existing consent holders the option to take up the new rules and run with them . Having worked hard for twenty years for my customer base and the way I run my business which obviously hasn't fallen foul of current ST rules I'd hate to think I wouldn't be allowed first option to carry on running it with the new guild lines whatever they may be .

Causing distributions to family's and business to throw a new trader onto a long standing pitch where the old trader knows his clientele and customer base inside out .

Breaking the rules and of course no one should stay .

I have a current pitch so in March 2020 when my current street trading consent ends what happens to me in respect of working on my pitch ?

Am I allowed to continue trading until I receive notification as to whether or not I've been successful in my application?

I understand that I need to make a new application for the pitch and six weeks after the consultation ends all applications will be considered and successful applicants are notified

If amendments are required to my pitch for example : a new trailer if required and if so how long am I allowed to complete the work?

I would like to improve the aesthetic and retail experience of my stall. The council must realise there are limitations in working with the current units. Any daily removal of units causes unnecessary disruption to the pedestrian areas. Also set up times are prolonged causing the stalls to look unprofessional.

Street traders are a vibrant and vital part of the culture of Birmingham. They have their regulars and are very much a consistent part of the community vibe in Birmingham. Dont make changes for the sake of change.

I have been a Street Trader in Birmingham since 1990, during that time I have approached BCC many times and asked for permission for static units that would complement the city.

BCC has never usefully engaged with me in bringing Birmingham street trading up to the standard of Manchester, Liverpool, Leeds, and London all of whom have static units and electrical connections. Instead, we are stuck with unsightly and unsuitable units because BCC cant get its act together, and when you do make and attempt to reform. Your first move is to attempt to dismiss the traders who have been trying form years to improve street trading and quiet frankly let anyone have a go at.

These proposals are counterproductive and poorly thought out.

They do not encourage investment, which is the very thing you claim to be seeking.

This policy is very detrimental to small independent retailers. The country is already losing its high streets, it would be awful to see independent street food sellers be lost too. Some of these businesses have been operating for 40 years and would be a huge loss to the local community and public at large.

As a street trader for 39 years, I feel that existing traders should be consulted on the new proposals. Also, maybe the enforcement department can set up a committee with a few traders to discuss the new guidelines.

I am in favour of setting up a meeting with enforcement officers at a convenient place suggested by the department

Fast food shops need to be checked for hygiene properly. More more fast food places to upon for another decade to many. And they leave mess arround. Litter is a huge problem and parking is a major issue.

section 5 paragraph one in two places states "... within the Birmingham." what?

would a number of stalls at say the Birmingham mela need a market licence?

Enforcement action - the offence time limits appear wrong, surely you should get the Second offence warning if a breach of conditions occurs with six months of the FIRST offence. Similarly with the third breach if it occurs with 12 months of the SECOND offence

Key Considerations - i cant see why auction sales would not be permitted and why should you have to provide evidence of a waste contract with an application. if the application is unsuccessful, then i would have a waste contract for nothing?

Need to consider permanent retailers thoughts to ensure temp traders do not obscure their units. I. E. The German Market. The units completely blocked out customers view of my store(Burton, New St).

Street trading is an important part of the community, as it brings relevant traders directly to the place where customers need them. As such, the review of the existing policies must be done together with the current traders, to take into account their experience and get feedback from them. Providing they meet the defined targets, for example a rating of 4 or 5 for street food traders, it would be fair to give existing traders priority to extend their current licenses. Here I think particularly of the food truck on Kent Street, THE DEVIL'S KITCHEN, which is part of the gay community and has looked after the customers more than just selling food, for 20 years now. As part of this review, Birmingham City Council should also consider the safety of the locations for the vendors themselves and for their customers. Adequate CCTV and waste disposal measures should be part of the planning.

Ensuring they are kept and maintained to a high standard and a good health and safety rating then they should be allowed to carry on trading

An example of this is the Trader on Kent street outside the game night club : I would be very disappointed if he lost his site ; he's traded there for a good number of years and has become part of the community in that area , and is always looking out for people out that late a night / early morning

Plus his food is much needed at that time of a night

"Street trading is an important part of the community, as it brings relevant traders directly to the place where customers need them. As such, the review of the existing policies must be done together with the current traders, to take into account their experience and get feedback from them. Providing they meet the defined targets, for example a rating of 4 or 5 for street food traders, it would be fair to give existing traders priority to extend their current licenses. Here I think particularly of the food truck on Kent Street, THE DEVIL'S KITCHEN, which is part of the gay community and has looked after the customers more than just selling food, for 20 years now.

As part of this review, Birmingham City Council should also consider the safety of the locations for the vendors themselves and for their customers. Adequate CCTV and waste disposal measures should be part of the planning."

some people cud lose their lively hood.

devils kitchen hurst street for 1 has kept the community safe and fed well with excellent reviews he shud have an open licence.

hitting our gay scene AGAIN. what will Birmingham city council take from us next its unacceptable hitting our street trader

There is a food establishment on the corner of hurst street (in a building) that for a number of years that has been given a zero on the hygiene rating! why is this establishment still in operation?

It should be taken into consideration what a business that has a street traders licence and has done for over ten years what they give to the community not just food or what they sell but someone people go to see for other reasons they may make a lonely OAP feel welcome and someone to talk to. They keep the peace when it may be kicking off due to someone being under the heavy influence of drink or drugs. (there isn't always a police officer around when you need one is there?) they are risking their own life to help people and put up with a lot

Surely the livelihoods of the street vendors need to be given first priority. You are risking people's lives being severely affected should they lose their business's. Some namely Devils Kitchen have been serving the Birmingham people for almost 20 years and have consistently met with both trading and important health food standards too. Why should they now lose their livelihoods.

I would like to see public performance licences enforced on streets also.

While not strictly street trading, I believe this is closely related as it is in public view and affects all members of the public in some form or other.

My biggest issue here is not with street artists / singers etc. - in fact these add much needed fun and culture to the area - but more so with random individuals with megaphones screaming religious ideology. You can be guaranteed of encountering at least one or two of these individuals and it is very frustrating to have to deal with such noise pollution especially in prominent trading areas that Retail BID and Birmingham City Council have put so much effort into improving, only to have it spoiled by these individuals.

Please stop this

Cancel the draft and the policy it's not really needed

Listen to the people who matter, not the councillors and the mayor who only want future glory, however tarnished. We like being able to pop into rackhams and then buy from a stall across the road. You know how difficult it will be for traders to hook up their stalls every night and bring them back every day. The stalls don't impact on night time revellers, few bars or eateries are at that end of the city.

Do something about the graffiti, the stalls in New Street are covered in the stuff, The city centre looks tatty and old fashioned . The trailer that's never open in Union Street smells of urine when you walk by .why don't they move it and take it to a carwash ?Why do they never come to work? why is it parked there? I walk past everyday.

The street lighting is poor in winter ,Its better when the German market is here , their stalls are so clean and brightly lit and they employ security people .I'm not interested in buying sausages to be honest but I always end up visiting their stalls because it feels like I'm on holiday in the Alps , I love the twinkly lights .

I hope your policy does a spring clean , bring in new people with new products, rotate the stalls and the goods on offer to stop stalls next to each other the same stuff - can we have more variety please

If you are going to restrict the street traders you would need to also look at shops that move there things onto paths eg soho road Handsworth and Stratford Road

I would ask the council to seriously consider the livelihoods of the street traders already trading, and consider them as first choices for available sites and pitches

we personally really like the street trading in Birmingham, it adds character, vibrancy and diversity to the city!!!

We have many available places around the city centre to be occupied by small business owners. Which gives a new chance to those business traders to grow up.

Otherwise, the biggest companies business just eating every chance from others to be in Birmingham city. Which is making huge gap between Birmingham levels resident. And will increase the crime very soon.

A fair policy would be to bring in any new rules and regulations with the current street traders and offer any new sites to any interested parties with the proviso that any current traders not meeting the new regulations would need to up their game and re-apply.

Nobody should be forced out of their livelihood due to a policy change if they commit to following the new policy, as current street traders would. It is totally unfair to take pitches away from traders who may have worked there for years/decades.

I think that current street traders in that area should be able to keep their pitches, if for some reason they don't abide by the rules then their pitch should be made available to others. It's hardly fair to take away someone's pitch which has taken them 20 years or more to build up.

im all for giving everyone a chance but not at the cost of existing business traders

None

Street traders are hard working business owners and should be supported to provide the services that they already supply. They should not be penalised as sole traders and should be allowed to trade within the same health and safety parameters as other stores and shops.

Food street traders provide a quick much needed service, especially at night rather than groups hanging around pizza shops where trouble can escalate, street food traders serve us we jump in our taxis and take it home. You state about food hygiene ratings street food traders I use is a five star yet there are many food premises in the same area that have a zero rating, one in particular for over 2 years surely its these places that should be moved on for other traders to take over?

I do believe that after trading in Birmingham for nearly 40 years that existing traders, in whatever trade they are in, should be given first choice in been able to apply for their current pitches. This in on the basis that they abide by some of the proposed rules that the council have set out. Also, each individual pitch has different issues to deal with day in, day out. I think an enforcement officer should visit each site and discuss with the trader, the most appropriate way to go forward. With so many shops closing down, the public need street traders to furnish their demands. We offer a very valuable service to our clientele, and have a fantastic relationship with our customers, considering the times that we live in. I for one, would be lost without the weekly banter I have with my customers.

BCC really need to acknowledge and explain their failure with the wholesale and rag market. This spectacular mismanagement makes it a ridiculous aim for them to attempt to 'improve' street trading policy when they clearly lack knowledge and relevant experience in this field. Leave it to the specialists

My main concern is around the annual renewals of consents. Currently, providing there have been no issues with a trader, their annual consent is automatically renewed. The proposed policy will remove security for traders and will mean that they are unable to invest in their units, plan financially, obtain a business loan or have any peace of mind at all. A street food van, for example, could cost an initial £100,000; If a person wants to set up a business, they will need to have the guarantee of a pitch for the duration of whatever business loan they took to buy said equipment. It's completely unacceptable to take this away.

We are the second city and we need to help restore the pride in our city and get this sector under control. We get many visitors for the German market, theatres, music venues and we want them to return!!!!....We compare our city constantly to other large cities but we need to stop that and control what we can....this is one of them

With the council. Already having a policy in place that can remove Traders Who don't conform? This should be activated. To enable new entrepreneurs to access the city sights and also open up new sites. Should they get through the criteria already laid down in your application process?

there should be a standardised street trading units, the products and services should be of good quality and not counterfit or fake. there should not be any micrphones used for street trading.

Its imperative as a city that is growing and becoming more attractive to Domestic and international investment we should have a clean safe, smart city reflect of the investment we are attracting
Currently my customers complain about the appearance of the street trading units, the preachers with amplified sound and the tent structures, it distracts from what should be a great visit to our city

The proposed street trading policy is meaningless waffle, designed to make the council look like it is 'doing something'. There is no problem with the existing street traders in the city centre.
Instead sort out the shops that block pavements, and the beggars & street preachers annoying the hell out of shoppers in the city.

Existing traders should be given licences to trade for the duration of their working lives.

Whilst I agree that the council should introduce an offer that compliments the current infrastructure and enhances retail, I do not think their current proposal fits this criteria.
I am aware that this decision will be taken by the council very seriously. However it is regular working class members of the public's livelihoods at stake. Members who have survived recessions and work in all weathers, having their chance at putting food on their tables taken from them.

Find something else to fix - there are no issues here so why make one. Spend the time, money and effort on the sectors that need it!
Leave the street traders alone, they carried this city through recession and through hard times and have been there years, wind, rain, sun, snow! That's more than the people making these decisions have ever done in their life!

Street traders need more respect, they provide a community and consistency within Birmingham. I feel that all street traders are being targeted just for the city to set up their own stands to fill their pockets. I'm sure the rules will change for when the German markets in town

Most market traders are tidy. At the end of the day they clean up after themselves and bring a bit of life to what would be empty streets. Town is already competing with out of town shopping centres why ruin the uniqueness of the town centre by getting rid of the market traders. The banter they provide brings back memories of old thriving Birmingham!

Birmingham City Council must endeavour to protect existing street traders in any new policy, whilst retaining the ability to sanction those who do not comply. Big business must not be allowed to dictate who stays and who doesn't. Independent arbitration must be written into the policy- it is vital to prevent corruption.

The devil's kitchen in the gay quarter is a community mainstay and has always traded and represented themselves well. They have fantastic hygiene ratings and care deeply about the community in which they trade this should be considered along with other traders on an individual basis before implementing policy which would see these businesses close for good.

Just please have some sympathy and consideration for the existing traders and their business

Established business should be able to continue to trade where they have been for many years as even a simple change of locations can put a someone out of business as long as they are paying and licensed they should be able to trade in the city center
Don't ban devil's kitchen
I am a big fan of devils kitchen outside the nightingale it's been there almost 20 years it's part of the Birmingham gay sence
<p>If you are producing a map indicating areas prohibited I would suggest also highlighting areas that can be used for regular markets. I would like to see the council encouraging and facilitating more street closures for independent markets in the city centre and suburbs. Many areas including John bright street, Hurst street, The jewellery quarter and kings heath are underused for markets. We should encourage the vibrancy independent businesses bring by supporting these ventures rather than asking organisers to bear the cost and take the time to apply for/organise street closures and anti terror measures. Application processes should be simplified, Anti terror measures built into the street scene (as proposed around New street for the German market) and discounted packages for infrastructure (toilets/security etc) put together.</p>
This is a complete waste of time and money these traders have been trading for years this is just another nail in the coffin for the city centre
None
<p>As a retailer on the High St, I am nervous about the volume of street traders that could be operating at any one time, given the sightline to my store is likely to be obstructed by street traders. I would like to understand more around what your maximum capacity of traders is at any one time on High St.</p> <p>I would also like more information on types of traders you will give consent to. E.g market style stools selling cheap quality goods with poor presentation, which would only diminish the appeal of the high st, and potentially detract footfall in the area , where as premium street food venders would be a positive footfall driver and enhance city centre trading. Further detail on your aspiration to attract traders that will compliment and enhance the current retail offer would be valuable to share.</p> <p>Thank you</p>

Street trading has been around Birmingham City Center for a very long time and it should continue. People don't always have time to go into big stores to buy things such as lunches as most working people in the town center have a limited amount of time to buy and eat their purchases.

Yes, I think the outlets should be monitored - food health etc and I am sure that most of the traders take any waste products away with them and don't leave them around to feed the vermin.

I have a variety of comments, which I hope can be taken as a constructive feedback. Within my research work I have no obligation to do such, but it seems a potential window of communication with the council, and I honestly believe there is room for improvement in the draft policy (or for further discussion with the street traders in Birmingham). First of all, in having a

policy consultation done in the shape of a rather closed multiple-choice form, I could argue that citizen participation falls within what Arnstein (1969 - 'A Ladder of Citizen Participation') would label as 'Tokenism': "citizens may indeed hear and be heard. But under these conditions they lack the power to ensure that their views will be heeded by the ones (with decision-making power)" (p. 2)

The questions in this consultation are somewhat superficial, undifferentiated and tending to a specific outcome - i.e. support the policy. I agree that the development of a policy is undoubtedly a positive idea but the proposed one was developed in a not very participatory way – the text reveals it. First, I would like to know if the Equality Assessment mentioned in the Introduction is available for public access? Second, going through the different sections of the text, I found contradictions between 'friendly and inclusive sentences', with other ones revealing a sort of 'urban hierarchy which is not very inclusive to people as street traders'. Sentences as the third paragraph in the Introduction and the two following statements:

'Street trading can aid the local economy and contribute to the facilities offered to people who visit, live and work in Birmingham and it supports the Birmingham City Council's priorities:

- a) Birmingham is an entrepreneurial city to learn, work and invest in;
- b) Birmingham is a great city to live in;' (...)

as well as the statement in Section 6:

‘Why do we have street trading?’ (where the answer contained) ‘street trading encourages a vibrant and prosperous economy. It provides employment opportunities for local people as well as a seedbed of entrepreneurship, allowing new entrants to test their business skills and ideas in an environment which has a low start-up costs, minimal overheads and existing customer footfall’. seem to agree with the values established in the city council plan for 2018 - 2020 ('Birmingham as a city of growth where every child, citizen and place matters').

In the statement contained in Section 7 (p. 6):

(...) Consents will be granted to those applicants who best reflect the aim of this policy to:

“create a street trading environment which is sensitive to the needs of the public and businesses, provides quality consumer choice and contributes to the character and ambience of the local environment whilst ensuring public safety, preventing crime, disorder and nuisance”

(...) Consents will be granted to those applicants who best reflect the aim of this policy to:

“create a street trading environment which is sensitive to the needs of the public and businesses, provides quality consumer choice and contributes to the character and ambience of the local environment whilst ensuring public safety, preventing crime, disorder and nuisance”

I would ask ‘which businesses’ are the needs of being considered? The ones from the traders themselves? The big malls or franchises in the city centre? It creates some ambiguity. Within Section 8, subitems 2 and 3 within ‘Prevention of Nuisance’ places the trading activity in a rather limited scope/ location. Any surrounding activity is given the right to complain about the unit’s presence for varied reasons, which the council has to investigate (with no clear criteria) and decide about.

The ‘Suitability of the applicant’ (p. 7) also presents some logical reasons for unsuitability of trader applicants, but no criteria as ‘seniority’ for the guarantee of continued licences to current traders. There is no praise or recognition for people working as traders for years in specific locations. Moreover, the new trading policy offers no security whatsoever of the continuation of an established commercial activity, according to the explanation given in Section 7.

In terms of the 'Suitability of the Unit' (p.7), the subitem 1 (mentioning Appendix 3) and the subitem 5 present the notion that, if a unit is invested on today, it might need to be changed in a short time, since 'the design brief will be kept under review'.

The rules for advertisement are also extremely rigid, at odds to all the rest that can be seen in the city centre: flashy and blinding lights, from shops from the Bull Ring Shopping Mall and the Grand Central and New Street station. The discretion demanded from the trading units sound a bit ironic.

'Hours of trading' (p. 8): 2 – 'Avoiding disturbance due to noise, smell or any other matter that the Council considers appropriate' (the end of this sentence is elusive. It should contain examples or clear definition of what the Council will consider inappropriate).

The Subsection 'Selling the right goods' (p. 8) has a statement strongly implying that the council considers street trading an 'inferior' activity when compared to fixed retail businesses, presenting a rather exclusionary mindset: 'The sale of goods from street trading should complement those provided by nearby businesses/retail shops. The types of goods allowed to be sold will be considered on a pitch-by- pitch basis and specified on the consent. (...)'

'Site Assessment' (p. 9): 'Obstruction of entry to or sight lines to the entrance of retail premises or obstruction of display windows of retail premises' further reinforces the uneven hierarchy implied, between trading and common retail commerce, which I mentioned above.

In the item 9 (Types of Street Trading Consent) (p.9): It is unclear, in the 'Annual street trading', if in enabling the consent holder to trade 'up to seven days a week' this means: a) the trader can work seven days if it wishes to; b) the council will decide how many days in a week that trader can trade in the specified pitch, with the possibility of more than one trader working there, in different days of the week. This lack of clarity can create interpretation problems for the traders intending to apply for a consent.

'Occasional Street Trading' (p.9): Why no more than 30 consents for occasional pitches? Why this specific number?

Item 10 (Consent Application, Renewal and Surrender) (p. 10): No mention is done about a potential 'preference' to the maintenance of a pitch for established traders. Is there any criterion defending a 'right of preference' for renewal rather than a new application, if more than one trader shows interest for a specific pitch? Or are the current traders to lack any sort of protection to their activities/ jobs?

<p>Item 15 (Applications): subitem 'the goods sold will not complement the surrounding retail offer' implies that basically nothing in main retail locations in the city centre (New Street and High Street, for instance) would be accepted. Again, this implies an unfair hierarchical consideration of permanent shops against street trading units.</p> <p>This list is not exhaustive' – sorry, but the criteria should be fully explicit and complete. If this list is not exhaustive it shall be completed before the release of the policy. Otherwise it shows that the council has no limits to its own activity, and public accountancy should be an element of a policy requesting public consultation.</p> <p>Subitem 'Making an application' (p. 13): 'Upon receipt of the complete application the Street Trading Team will consider the application in line with the key considerations outlined in section 7 of the policy and conduct a consultation as detailed in this section of the policy.'</p> <p>Even commenting on the process on the item 'Consultation' (p. 13-14), the consultation process is poorly explained and elusive, implying again a limitless power to the council in relation to the applicant traders.</p> <p>Finally, I would like to draw attention to the need of daily removing the trading units, from traders with annual consents. Considering the new policy of clean air, and some new changes also under consultation about vehicle access restrictions in the city centre, it seems absolutely pointless to demand the trading units to be daily removed just to be placed again the next morning on the very same spot. If this rule is to be enforced, I would like to understand what is the motivation for such. I admit that so far, in knowing some streets in the centre where trading units are located, this rule seems just the creation of a public burden, in my opinion. Especially being aware that most of these units have not been moving till now. Unless there is an intended rodizio of businesses in a same pitch on the same week - or some other reason that I would welcome being explained about - the moving of units seems to me a demand that actually aims to discourage the trading activity as a whole, especially in the pedestrianised streets of the centre, which ironically are the ones with higher footfall.</p> <p>I hope these comments can be of some use to the council and related stakeholders affected by this draft policy.</p>
<p>The BCC policy document seems to have covered the main points...but enforcement must happen for the policy to work...I see too many pop-up traders selling environmentally harmful "stuff", and a number of the larger established stands spreading and using space well beyond their given boundary. A consistent and quality look suitable for the streetscape is required to help overcome the poor perceived image of Birmingham.</p>
<p>I am the Partnership Manager for the Parks Service and have just completed a tender exercise for mobile catering services in parks. Following discussions between Darren Share (AD for Street Scene) and Paul Lancaster, Paul has suggested we request an exemption for catering services in parks as there are already contracts in place for these operators (both mobile and static catering). Please accept this as a formal request for the policy to be updated and for catering services within parks owned/managed by BCC are exempt from the street trading policy.</p>
<p>The policy states that Business Improvement Districts MAY be consulted over applications for street trading licences. I think this should be 'WILL' be consulted.</p>

We do a Street food policy but it shouldn't discriminate against those traders that are currently trading and they should be homes first and the process made easy for them.
Regarding proposals in policy to match the changes in infrastructure in my view they are not required.
Be fair to street traders it's their livelihoods.
Leave current traders alone
It is unfair on current traders who work hard and have experience in their field. If they already work there or have worked there for many years it is unnecessary for them to keep reapplying.
People have not thought about the people who could lose their businesses that they spent number of years building up from there there they could lose everything just so the council want to make more money of people to fill their pockets.
The readers have been around and loyal for many years no reason why they should now be judged as the council have nothing better to do
I hope this covers religious shouters of all persuasions and get them out or at least no microphones allowed. Keep the baked potato stalls!! Healthy, reasonably cheap, quick food for workers and visitors alike and not readily available elsewhere except in pubs.
What support is in place for traders ?
Reduce the monthly cost as it is much too expensive at the moment or consider a percentage of profits model. The monthly costs has been a huge barrier to entry for a startup enterprise. Also consider an arbitration entity as mobile licenses could cause conflict. Also consider a multiple site discount.