

**Agenda for Licensing and Enforcement  
Committee  
Wednesday, 15th March, 2023, 10.00 am**

**Members of Licensing and Enforcement Committee**

Councillors: J Whibley (Chair), K Bloxham (Vice-Chair), F Caygill, M Chapman, I Chubb, O Davey, A Dent, S Gazzard, P Jarvis, D Manley, C Pepper, B Taylor, T Woodward and T Wright

**Venue:** Council Chamber, Blackdown House, Honiton

**Contact:** Sarah Jenkins;

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(or group number 01395 517546)

Monday, 6 March 2023

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1 Public Speaking

Information on [public speaking](#) is available online

2 Minutes of the previous meeting (Pages 3 - 6)

3 Apologies

4 Declarations of interest

Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)

5 Matters of urgency

Information on [matters of urgency](#) is available online

6 Confidential/exempt item(s)

To agree any items to be dealt with after the public (including the press) have been excluded. There are no items which officers recommend should be dealt with in this way.

7 Street Trading Policy update (Pages 7 - 194)

8 Quarterly update report (Pages 195 - 199)

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[Decision making and equalities](#)

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**EAST DEVON DISTRICT COUNCIL****Minutes of the meeting of Licensing and Enforcement Committee held at Council Chamber, Blackdown House, Honiton on 7 December 2022****Attendance list at end of document**

The meeting started at 10.03 am and ended at 10.41 am

**17 Public Speaking**

Mr Stuart Phillips, one of the proprietors of Millstream Taxis, Honiton, requested clarity regarding the date on which the adoption of the new hackney carriage fare table would come into effect. The newspaper notice of the fare increase had indicated that the revised fare tariff would take effect on 30 November, subject to there being no objections, whereas the increase was being discussed at the meeting today under item 9.

The Licensing Manager confirmed that there had been no objections and advised that taxi fare increases come back to the Committee for ratification. The earliest date a meeting could be held was today, and subject to the discussion at item 9, the fare increase would take effect from today's date.

**18 Minutes of the previous meeting**

The minutes of the meeting held on 26 October 2022 were agreed and signed as a true record.

**19 Declarations of interest**

There were no declarations of interest.

**20 Matters of urgency**

There were no matters of urgency.

**21 Confidential/exempt item(s)**

There was one item which officers recommended should be dealt with under Part B.

**22 Hackney carriage fares - adoption of new fare table**

With the agreement of the Committee, this item was brought forward on the agenda.

The Licensing Manager summarised the consultation process which had been widely viewed. No objections had been received. Subject to the Committee's decision, the new hackney carriage fare tariff would come into effect immediately and taxi operators would be made aware of the change later today.

The Licensing Manager advised that the recommendation had been amended to reflect that the Committee had the power to agree the adoption of the new fare table.

In response to a question regarding changing taxi meters to reflect the new tariff, the Licensing Manager advised that it was anticipated that operators would wish to make the change as soon as possible and that this could be done quickly by appointment. All meters should be changed by the cut-off date of 1 March 2023.

## **RESOLVED**

That the Hackney Carriage table of fares as attached to the report at Appendix A be adopted with immediate effect.

### 23 **Quarterly update report**

The Licensing Manager presented the quarterly update report which provided an update on the activities of the Licensing Service under the Licensing Act 2003, Gambling Act 2005, taxi legislation and general licensing including street trading and pavement licences.

The following points from the report were highlighted:

- Film makers have the right under the Licensing Act 2003 to have a film classified by the relevant Licensing Authority where they have not sought classification from the British Board of Film Classification, usually due to the cost involved. Only two such requests have been received in recent years, although the Licensing Team is aware that this is emerging work and should the need arise, the Committee will be provided with further updates. The request highlighted in the report at section 1.1.5 was in connection with a historic film to be shown at a folk festival next year.
- It is anticipated that the Licensing Act 2003 will be reviewed next year together with easements to support the industry as it recovers from the pandemic.
- The bulk renewal of licences had been completed and it was noted that taxi driver licences had decreased slightly due to a couple of retirements, with all other licences increasing.
- It was anticipated that the temporary pavement licences legislation is likely to be made permanent next year with the licensing work undertaken by the County Council being transferred to EDDC which will involve more work for the team.

In response to questions from Members, the following points were advised:

- Regarding the transfer of pavement licensing from the County Council, this would involve considerable work with thirty premises needing to be visited and enforcement checks undertaken. The Licensing Manager advised that there would need to be a review of officer capacity when this work transfers.
- With regard to the training of applicants to hold a premises licence, there is a requirement to attend an accredited training course provided by the Institute of Licensing.
- The Licensing Authority had not been made aware of any incidents of needle spiking within East Devon. It was noted that members of the public should report any incidents which occur.

The Licensing Manager was thanked for his report which was noted.

### 24 **Street Trading policy and designation of streets**

The Licensing Manager presented the report which set out the background to and the request for the public consultation to be undertaken on changing the current Street Trading policy which was due for review after its introduction in 2017.

Since 2017 there has been considerable growth in street trading, particularly due to the effects of the covid pandemic when street trading provided support to the public.

The proposal was to review the policy, including a review of the prohibitions around Sidmouth town centre, with a proposal to open Sidmouth seafront for longer periods. It was also appropriate to consider the district as a consent location and to consider the level of fees due to the costs borne by officers in administering applications.

Subject to approval, the consultation would commence in the new year for two months, followed by a formal consultation in the newspapers.

It was noted that there are locations where the public could queue on public land to access traders on private land. The Licensing Authority would only engage where street trading was impinging on public land.

The consultation would include the length of time ice cream vans were able to trade as this could have a significant impact on the trade of other similar business premises should vans be parked in close proximity.

## **RESOLVED**

1. That the Committee authorise public consultation in accordance with the legislative requirements on proposals to:
  - a. Rescind all the Council's previous resolutions to designate streets as 'Prohibited Streets' and 'Consent Streets' within the District, and
  - b. Designate all 'streets' in East Devon as 'Consent Streets' as defined in Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982 save for certain streets in Sidmouth (listed in Appendix D to the report) which shall be 'Prohibited Streets' except during a set period of time each year.
2. To commence public consultation on the Council's revised Street Trading policy and to set application fees to be charged for Consent to be granted.
3. That the Committee will receive a further report that will consider any subsequent representations received during the public consultation exercise and will make further recommendations to be adopted by the Council.

## 25 **Exclusion of Press and Public**

That under Section 100(A) (4) of the Local Government Act 1972 the public (including the press) be excluded from the meeting as exempt information, of the description set out on the agenda, is likely to be disclosed and on balance the public interest is in discussing this item in private session (Part B).

## 26 **Suspension of hackney carriage driver licence**

The report provided the Committee with an update regarding the suspension of a licensed Taxi (Hackney Carriage) driver. The report was noted and the Committee supported the action taken by officers.

### **Attendance List**

#### **Councillors present:**

J Whibley (Chair)  
K Bloxham (Vice-Chair)  
M Chapman  
A Dent  
P Jarvis

B Taylor  
T Wright

**Councillors also present (for some or all the meeting)**

**Officers in attendance:**

Phillippa Norsworthy, Licensing Officer  
Henry Gordon Lennox, Strategic Lead Governance and Licensing (and Monitoring Officer)  
Sarah Jenkins, Democratic Services Officer  
Stephen Saunders, Licensing Manager  
Zoe Jones, Licensing Support Officer

**Councillor apologies:**

O Davey  
S Gazzard  
P Millar

Chair .....

Date: .....

Report to: Licensing and Enforcement Committee



Date of Meeting 15 March 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

## Committee Update – Street Trading Policy & Designation of Streets

### Report summary:

The report sets out the method and results of the public consultation undertaken in respect of consideration to change some current Prohibited streets to Consent streets and to adopt the revised Street Trading policy to continue administering the regime. This report also sets out the proposed fee structure in respect of application fees for Street Trading Consents to support recovering the cost for carrying out its regulatory responsibilities.

### Is the proposed decision in accordance with:

Budget Yes  No

Policy Framework Yes  No

### Recommendation:

#### That the Committee;

1. **Note the results of the public consultation exercise undertaken (Appendix A) and**
2. **Resolves to keep streets as currently designated in East Devon (Appendix B) and**
3. **Approves the Street Trading Policy (Appendix C) and**
4. **Recommends to Council that the fees be applied to all applications received for Street Trading Consent from 1<sup>st</sup> May 2023 (set out in Appendix C)**

### Reason for recommendation:

To inform the Committee of the outcome and results of the consultation undertaken in accordance with the resolution made at its last meeting and to enable the Council to continue to recover the cost of carrying out its responsibilities relating to the administration of Street Trading Consents .

Officer: Steve Saunders, Licensing Manager (Governance and Licensing)

### Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

**Equalities impact** Low Impact

## Climate change Low Impact

Risk: Low Risk;

### Links to background information

Link to [Council Plan](#)

Priorities (check which apply)

- Better homes and communities for all
- A greener East Devon
- A resilient economy

### Report in full

#### 1 Background

- 1.1 The Licensing and Enforcement Committee is the Council committee with responsibility for Street Trading across the district having adopted the Council's Street Trading policy in 2017. The previous report to [Licensing and Enforcement Committee on 07/12/2022](#) set out the need to review the policy with this Committee approving the consultation that was undertaken.
- 1.2. In addition to reviewing the policy, the process also afforded the opportunity to review fee setting arrangements, having been under consideration by this Committee for some years.
- 1.3 In the run up to the policy review, both Sidmouth Town Council and the EDDC Events Team raised their wish to review the current trading prohibition along Sidmouth seafront in place by extending seasonal trading arrangements along the seafront. Following the last full review of policy and trading designations in 2017, Sidmouth remained the only town in the district with Prohibited streets where trading cannot occur even upon application.
- 1,4 The recent consultation was districtwide. Street Trading may only take place upon application, consultation and then only with Consent. The implementation of fees to administer the application and consultation process is necessary as street trading across East Devon is unlikely to diminish and its growth continues. The effect of having the 'Consent' designation for most streets and roads across East Devon since 2017 will continue to require resourcing in the licensing team to ensure that a safe and effective regime is maintained.
- 1.5 Any location holding the status of a 'Consent' designation does not automatically afford a right or expectation to trade from it. There are roads and streets where the conditions, such as narrow width of paths or highway, or the volume of vehicles would prevent Consent being provided due to the risks posed to road users through the presence of a trading unit.
- 1.6 Street Trading is defined by legislation as "the selling or exposing or offering for sale of any article (including any living thing) in a street". "Street" is defined as "including:
  - (a) any road, footway, beach or other area to which the public have access without payment; and
  - (b) a service area as defined in section 329 of the Highways Act 1980, and also includes any part of a street".
- 1.7 Legislation (section 3 and schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982) permits local authorities to adopt provisions to control street trading. This is by way of a regime that permits streets to be designated as Prohibited, Licensed or Consent streets. Streets designated as 'Prohibited' are not permitted to have any street trading occurring on them at any time, even under a road closure or other measures. 'Consent' streets are permitted to have trading occurring on them provided the District Council's Consent is obtained first AND providing each location is suitable. Controls in respect of the trading activity can be imposed on any consent by way of imposition of conditions.

- 1.8 East Devon District Council adopted these provisions with effect from 1 December 1982 (by virtue of the decision of the Policy Committee of 6<sup>th</sup> October 1982) and has since designated a number of streets in the District as either 'Prohibited' or 'Consent' streets. As provisions were only adopted by the District Council, it is the licensing authority that operates as the Council's regulatory body and determines each street trading application for grant or refusal.
- 1.9 Town and Parish Councils and local Ward councillors are consultees. When an application for new street trading consent is received in their area, relevant responses will be invited. It remains solely for the licensing authority to determine (grant or refuse). The police, highways authority and Environmental health teams may submit regulatory objections during consultation periods and Devon County Council can refuse the right to use any highway.
- 1.10 Honiton and Axminster town markets have long established historic Charter rights that allow them to hold certain legal markets. This means that these markets do not need a street trading consent under that legal exemption.
- 1.11 It is a criminal offence under legislation to trade from a Prohibited street or from a Consent street without a consent. Arranging a road closure in a Prohibited location does not overcome the Prohibited designation to make trading possible and consent still cannot be granted.

## **2 Public Consultation Methodology**

- 2.1 The public consultation exercise commenced on 17 January until 26 February 2023 being districtwide. The procedures followed previous licensing consultations with the requirement for written responses from anyone wishing to contribute. Should this Committee resolve to further change the designation of any street that would require a further statutory process with legal notices being published to inform the public of a further statutory consultation.
- 2.2 The consultation has followed LGA and government consultation principles that included adopting the timeframe to ensure completion within the working timetable of this Committee and by avoiding local elections that will occur this year.
- 2.3 The consultation informed individuals, groups and authorities and allowed sufficient time for other Councils to meet and respond and for relevant authorities to direct details to their necessary services. Residents/citizens have had sufficient time to consider and to respond.
- 2.4 The proposal to introduce application fees are relevant and important for current traders, being those holding trading consent and who may wish to comment, along with those who will apply to trade this year for seasonal events. Case law outlines that it is permissible for local authorities to consider a reasonable fee as necessary for processing the grant or renewal of street trading consents and so notifying consent holders of that was necessary.
- 2.5 The districtwide consultation was conducted as the policy applies to all of East Devon and mobile traders operate under the policy in various villages and towns. To raise awareness and encourage participation the consultation was publicised and sent out in a variety of ways:
  - It was publicised on the council's licensing website.
  - Circulated in the weekly EDDC 'Residents update' newsletter
  - It was further highlighted by other bodies and in local media outlets for the public.
  - A press release sent out to the local media by EDDC Communications team.

The commencement of the consultation was sent by email to:

- All our town and parish councils and EDDC elected members.
- Local organisations that organise street trading in the East Devon.
- All East Devon Chambers of Commerce.
- All street traders who hold Consents or who apply seasonally to hold Consents.
- Statutory bodies that are consulted upon each application

- 2.6 Given the volume of responses expected and duly received, it was neither possible nor appropriate for officers to engage verbally with respondents during the consultation. The level of responses negated any opportunity to respond to written questions or to consider verbal responses. All written responses received during the period are recorded in a full summary at **Appendix A** for the attention and consideration of this Committee.
- 2.7 This council utilises various platforms and tools for engagement with communities which were considered for this consultation. Methods that only offer an opportunity for anonymous responses or where the details of any respondent cannot be readily gathered were not suitable for use on this occasion. General comments provided on other forms of social media are not suitable for the same reason. The web page link to the revised policy and the process for submitting a response were widely circulated and were extensively used to respond.
- 2.8 It has previously been reported that a series of public consultations were conducted in 2016 and 2017 prior to the introduction of the current Street Trading policy given the significance of delivering a new, district wide policy at that time. The current policy has been kept under review since then and the level of engagement was sufficient for its first full review since its implementation.

### **3 Consultation Responses**

- 3.1 At the close of this consultation a total of 301 responses were received by post or by email. Not all respondents have outlined their status whether as businesses, residents, visitors or traders. The majority of responses have focused or have commented upon matters relevant to Sidmouth, in particular with regard to supporting or objecting to lifting presently prohibited locations in the town. 2 responses were received after the last date of the consultation and could not be included.
- 3.2 Overall, 250 responses have been received and recorded in Appendix A as objections to changing the current designations in Sidmouth, amounting to 84% of responses. Those who responded in support of changing the current prohibited locations in Sidmouth amounted to 25 responses, being 8% of all responses. The remaining 8% of responses were relevant to trading in Exmouth or Cranbrook, or raised points that could not be considered as support or objections or being points in general.
- 3.3 Those objecting gave reasons why the designations should not be changed in Sidmouth and have provided detailed responses on many occasions. It was evident that the number of responses received was higher than that of 2017 when first setting the policy.
- 3.4 Responses were not received from three authorities that are statutory consultees for new and renewal trading applications, being Devon and Cornwall Police, EDDC Environmental Health and Devon County Council Highways. No reasons have been reported and it is customary for them not to comment if there are no changes, concerns or objections to raise.
- 3.5 Sidmouth Town Council responded and requested that small areas of the town currently being Prohibited, should be included as Consent locations for street trading, but otherwise the existing designated prohibited locations elsewhere in the town should remain (see point 13 Appendix A). The town council resolved that only supported applications should proceed and otherwise should not be issued (granted) without the town councils express agreement. 1.8 of this report outlines that parish and town councils do not have rights to approve or to refuse an application being invited to comment as consultees. Determination of each application is the responsibility of the EDDC licensing authority under adopted legislation.
- 3.6 Support for the change provided by Sidmouth Town Council was outlined in a response on behalf of Sidmouth Coastal Community Hub who produce Sidmouth Sea Fest (see Point 284 Appendix A).
- 3.7 EDDC Streetscene Events team responded and outlined points to consider amending wording in the Street Trading policy. The earlier proposal to increase seasonal trading periods

for Sidmouth seafront (see 1.3) was not submitted in writing. Absence of that proposal in the response cannot inform the Committee now to consider it on behalf of this respondent.

- 3.8 Cranbrook Town Council responded in support of the continuing street trading policy arrangements in the town. This has followed working collaboration between the town council and the licensing authority to foster a safe balanced approach in the town.
- 3.9 Axminster Chamber of Commerce responded with general support to the policy and outlining its fairness.
- 3.10 Sidmouth Chamber of Commerce responded (see point 288 Appendix A) outlining strong objection to changing trading designations in the town, providing 6 key points along with highlighting its view that the consultation process was flawed.
- 3.11 Only one current trader holding Consent has objected to implementation of application fees (point 24 Appendix A). The arrangements to apply for Consent have been without charge since 2018 and this Committee has been informed of the need to address the costs of managing the application and consultation process. A view was raised (under point 67) outlining the proposed fees will not create a significant difference to recover costs. A further trader not currently holding Consent outlined the burden of paying 'thousands of pounds' in street trading fees being a figure which cannot be attributed in this district (point 229 Appendix A). Despite the proposal to re-introduce fees for accepting and consulting on applications, there has been very few trader responses to this proposal.
- 3.12 The organiser of Sidmouth Folk Festival provided a response (point 227) being relevant to the one week of the annual festival and outlining any further trading on the Promenade may have an impact on businesses
- 3.13 The second response received shortly after the consultation began was from a Sidmouth based business outlining an objection and detailing the impact on their income as a result of street trading in the town (see point 2 Appendix A). Subsequent consultation responses received from numerous current and former businesses in the town have objected and outline the impact to their businesses in the town through street trading.
- 3.14 A significant number of the 250 objections originate from individuals, residents and some voluntary organisations in Sidmouth expressing the impact to the town should the current street designations be changed further to accommodate street trading.

#### **4 Consideration of Changing Currently Designated Prohibited Streets**

- 4.1. As a consequence of the consultation and the level of objections received against changing designations in Sidmouth, the Committee may wish to consider whether there is any sufficient justification for changing the current designation for streets.
- 4.2 Ultimately it is a matter for the Licensing and Enforcement Committee to consider any change in light of the consultation responses based on the information contained in the report. The level of opposition received in Appendix A is clear and evident.
- 4.3 If it were considered necessary to resolve to change the current designated locations, that would require a further legislative process to rescind previous resolutions that designate Prohibited streets and to resolve to designate streets as Consent Streets. The level of responses already received through this consultation could be provided again should the Council proceed with publishing formal notices under another statutory consultation. That procedure would come with further costs for arranging publication of newspaper notices.

- 4.4 If it is considered necessary to retain the current designated locations following the consultation, no further process will be required and the areas of Sidmouth that are currently prohibited would remain so under **Appendix B**.

## **5 Street Trading Policy and Application Fees**

- 5.1 As a result of the responses and points raised, further amendments have been made to the Street Trading Policy shown in red font under **Appendix C**.
- 5.2 It is recommended that the revised Street Trading Policy including the proposed application fees are approved by this Committee to allow the regime to be managed.
- 5.3 If the Committee resolves to adopt the revised Street Trading Policy and the proposed application fees set out, that this Committee recommends to Council that the policy and fees be applied to all applications received for Street Trading Consent from 1<sup>st</sup> May 2023.
- 5.4 The revised Street Trading policy and the proposed fees have now been subject of public consultation with the recommendation being to resolve to implement the revised policy and the fees and to leave the presently listed Prohibited and Consent streets without change.

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### **Financial implications:**

If the approval of the reinstatement of application fees are re-introduced this will provide Street Trading income to the scheme. Costs would be incurred if delivering another proposal to the public by means of public notice to be advertised in the newspaper by existing advertising budget. The expected income is £1000 a year.

### **Legal implications:**

The legal framework is set out within the report and there are no legal implications requiring comment.

**EAST DEVON DISTRICT COUNCIL**



# **STREET TRADING POLICY CONSULTATION**

## **REPRESENTATIONS AND RESPONSES RECEIVED**

Consultation Period: 17.01.2023 to 26.02.2023

March 2023

### Table Headings

- |                            |   |
|----------------------------|---|
| 1. Response number         | The overall number of responses that were received within the timescale                         |
| 2. Reference number        | A unique number given to the particular representation and the respondent                       |
| 3. Policy paragraph number | This identifies the section of the Policy to which the representation relates                   |
| 4. Details of comments     | A full copy of the representation received  |
| 5. Appraisal of comments   | Sets out the appraisal of the representation  |
| 6. Council's Response      | Details the Council's response to the representation – i.e. whether or not a change is proposed |

### Consultation Responses received – January – February 2023

1	2	3	4	5	6
1	HONC ARN	3.1(c) Charter Market Legislation	Reading the very last paragraph of this email does this mean that as the stalls trade on Honiton High Street during Honiton Carnival are they exempt from this legislation? or does exemption only apply to the weekly markets? There seems to be a difference in regulations - because of the market charter or Pedlars act (I'm not sure which) we can't charge mobile sellers who come to sell on carnival night yet we have to comply with this legislation whereas the market doesn't. It seems very confusing. It would be good if you could give us some definitive guidance	Clarification on differences provided between various Acts.  No change to policy is proposed.	No
2	JHDSS	Lifting of prohibited streets in Sidmouth	As a local business that operates all year round I strongly object to additional street trading. The increase in trading on the street is now having a significant negative impact on our business which trades all year round in Sidmouth. During folk week we have see a significant drop in sales from the increase number of food traders allowed to operate. This year we will be unable to sponsor the folk festival due to loss of revinue which occurred last year. I would strongly support any initiatives for local business first and not street traders who do t have to pay any of the premises cost!!!	Noted as an objection to the proposals  No change to policy is proposed.  <i>Sidmouth Objection 1</i>	No
3	MPPAL	Cranbrook guidance - 6.54 to 6.66	I have a few comments on the Section of the draft policy dealing with Cranbrook (6.54 to 6.66).  Paragraphs 6.57 and 6.64. Although not stated explicitly, I'm concerned that these paragraphs may lead to the assumption that fast food is always unhealthy. This is not the case.	Detailed response Noted.  EDDC and CTC have worked to provide an appropriate policy where premises and street based	No

Paragraph 6.58. The suggested limit of two takeaway premises is very old and was certainly in place in 2021, possibly 2017?. The town has grown very substantially since then and is likely to grow a lot more in the coming years. If the planning condition limit remains at two premises, then street trading businesses are ideally placed to address the greater demand arising from the increased population.

Furthermore, I understand that the town centre development will include up to three food businesses that will be permitted to sell takeaway food. The shops will be available in early 2024 and it is assumed that any existing planning restriction will need to be removed by then. The policy will presumably be intended to last for at least a year and should therefore address future needs. Numbers should reflect this.

Paragraph 6.61. The paragraph suggests that it is only negative aspects of residential amenity that should be considered. The whole section on Cranbrook carries the overriding presumption that street trading is a bad thing that should be discouraged but needs to be tolerated. This is with the exception of paragraph 6.55 which refers to EDDC’s wider policy which is “...to create a street trading environment which complements premises-based trading, is sensitive to the needs and amenities of residents, provides diversity of consumer choice and seeks to enhance the character and ambience of local environments.”

Paragraph 6.61 should reflect these wider EDDC policy goals and make clear that residential amenity can be enhanced by street trading, offering greater consumer choice and enhancing local environments.

Further comments following email about his current renewal application:  
I think the policy includes presumptions and judgements that may not be accurate. Partly this is the result of changing circumstances over the years. I don’t want to start a campaign or objection, but I do wonder whether there is any way that the following considerations could be brought into the policy makers’ awareness.

With regard to proximity to the play park, I’m not sure why a pizza van is any more of an issue for this than a fish and chip shop, Chinese takeaway or a shop that sells alcohol. I appreciate that the suggested site is a little closer to the play area than these other businesses. Again, there is the suggestion in the policy that a street trading business is necessarily a negative factor, and I wonder the justification for this.

trading may occur. That remains under review as the town increases in size and population.

The proximity of fast food outlets to locations such as schools was a policy stipulation in 2017 by Environmental Health Teams.

The response No4 from CTC provides a balance of how the town and this policy has evolved in 5 years.

There have been no responses received from residents of Cranbrook.

No change to policy is proposed.

I also wonder the justification for the assumption that fixed premises businesses are likely to have more outgoings in terms of rent, business rates etc, and, following on from this, why their interests should be prioritised over ours.

Our business requires us to rent premises that we use as a prep kitchen, storage and parking for the van. I would venture that the amount of rent we pay per trading hour is likely to be as much as, or more than, the fixed premises takeaways in Cranbrook.

In terms of business rates, we qualify for the small business exemption, and I would suggest that this may also be the case for the fixed premises takeaways in Cranbrook.

We pay over VAT, corporation tax and income tax in respect of employee earnings (I assume like these other businesses), so I would suggest that we contribute to the public good in a proportionate way.

I appreciate that the planning considerations are outside the control of the Licencing team. One point that I was seeking to make is that the planning restriction will likely alter in the near future to support the town centre premises, and so its impact on licencing policy can also change. The other is that, if the restriction stays, then the town will be inadequately served by takeaways – the draft Policy suggests it is a choice rather than an obligation for Licencing to limit food vans commensurate with the planning restriction on fixed premises.

I also make the observation that no consideration appears to have been given to the growing availability of takeaway food in Cranbrook through delivery platforms such as Just Eat and Deliveroo. This was very limited indeed back in 2017, and even in 2021 when we started trading there, but it has grown significantly, mostly being delivered from Exeter. One very material consideration of these platforms is their environmental impact. Meals delivered to Cranbrook will almost certainly be delivered by motor vehicle. If any gap in demand is filled by these delivery platforms, the adverse environmental and traffic impact would be significantly greater than if it was filled by a mobile food truck.

			Overall, I would suggest that our capacity to bring top quality food to Cranbrook is an asset to the community that should be actively encouraged. I am sure that our many hundreds of regular customers would agree, and I am not aware of a single objection to our presence in Cranbrook in two years of successful trading. I wonder why the policy does not reflect this.		
4	CRTC	Cranbrook guidance	<p>On 23 December 2019, Cranbrook Town Council's Planning Committee resolved to adopt a policy on street trading in Cranbrook which had been agreed with the licensing authority East Devon District Council. That policy set out guidelines as a basis for consideration of any application for a new or renewal street trading licence in Cranbrook (ref. minute P/19/53).</p> <p>The specific section on Cranbrook in the draft policy (page 13 onwards) very well reflects the local and current situation and reflects the very helpful discussions which the Town Council has been fostering with the licensing team at East Devon District Council when the approach to street trading in this town we discussed and mutually agreed. Achieving a balance where issues like health, choice, impact on established businesses, planning policy and availability/ accessibility in developing areas are taken into account has been a great success. The Town Council credits the licensing team for understanding and responding to the local context.</p> <p>Cranbrook Town Council endorses East Devon District Council's proposed Street Trading Policy</p>	<p>Response Noted</p> <p>No change to policy is proposed</p>	No
5	DP1	Definition of Street Trading	<p>I note the above proposed changes to East Devon's street trading policy in Sidmouth.</p> <p>I am pleased to note that public safety and the potential for criminal activity associated with street trading will be high on the Council's agenda when considering the changes. However, I am very concerned to note that street trading includes the sale of "any living thing".</p> <p>It is bad enough that live sea food could fall under this term, but it seems to me to be open to abuse by anyone choosing to sell living creatures of any description by this method. It could be very difficult for the relevant authorities to check that all the usual regulations and restrictions associated with such</p>	<p>Response Noted</p> <p>The wording 'any living thing' exists under the definition of Street Trading.</p> <p>Any application to sell any living animal would be carefully considered and assessed</p> <p>Environmental Health</p>	No

			<p>trade are being strictly adhered to, when a vendor can move from place to place and sell on the street.</p> <p>Could you please let me know how the Council would be able to protect any such creatures, and the public, in these circumstances?</p>	<p>Teams are a consulted on all street trading applications having responsibility for animal licensings.</p> <p>No change to policy is proposed.</p>	
6	MD1	Lifting of prohibited streets in Sidmouth	<p>I would support changing the street trading designation in Sidmouth to come into line with the rest of East Devon by becoming known as “consent” streets.</p> <p>I would draw attention to the following requests if I may:</p> <ul style="list-style-type: none"> <li>• it would be beneficial if the council encouraged or incentivised street trader companies or products not currently available in Sidmouth.</li> <li>• Please can an enforcement be in place to ensure any vehicle or stall to be traded from, is designed and presented in a style that compliments the wonderful architecture of the town.</li> <li>• Themed street trading events would be good. An antique fair, food festivals, victorian or craft events would be good examples.</li> <li>• I particularly support street trading on the sea front but would ask that stalls are staggered to allow expanded space in-between to make it easier for lots of foot traffic to pass by. The atmosphere on the sea front during folk week is fantastic but it does become rather congested along the prom.</li> <li>• I would ask the council to consider allowing weekend street trading on the prom during April and September in addition to the planned whole week trading between 1st May through to the 1st September.</li> <li>• If music is allowed to be played as part of the trading unit, the volume should be limited to a level that does not interfere with adjacent stalls or business.</li> </ul> <p>Thank you for enabling this consultation to take place and the councils continued investment and development of Sidmouth town.</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Support 1</i></p>	No

7	PW1	Lifting of prohibited streets in Sidmouth	<p>With regard to the proposals to widen the scope for street trading in Sidmouth I feel I must advise you that I am very opposed to this idea. The shops.in Sidmouth are already suffering from increased expenses from fuel to stock and the idea of allowing more itinerant traders is not a good idea. People only have a definite amount of spending money and spreading this more thinly is abhorrent.</p> <p>With regards to traders already allowed on the Esplanade during folk week I feel that they would be better sited together in a defined area away from the sea front which gets overcrowded and should be left for tourists , locals, buskers etc. Would it not be better to site the traders in Manor Road car park , the knowle (where they used to be,), Mill St car park or even the car park by the swimming pool and sailing club where they would be a separate attraction and more sheltered from the elements.</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 2</i></p>	No
8 page 19	SH1	Lifting of prohibited streets in Sidmouth	<p>Your consultation makes no references to the benefits it will bring to any of the following:</p> <ul style="list-style-type: none"> <li>- Residents</li> <li>- Existing traders</li> <li>- Visitors</li> </ul> <p>But here are the some of the adverse impacts it will have:</p> <ul style="list-style-type: none"> <li>- Negative change on the ambiance of Sidmouth (not all seaside town have to be the same; there is a place for Margates and Blackpools and a place for Sidmouths – we need them all)</li> <li>- Increased litter and food waste (and the consequent further problems these cause)</li> <li>- The stalls will attract the type of client who purchases the goods sold by the stalls; don't lose sight of the target visitor to Sidmouth and the impact that will have on existing retailers, hospitality and hotels.</li> <li>- Reduced trade of existing traders whose outgoings in shop units are greater than those of stallholders</li> <li>- Exploitation of visitors who are offered goods by market traders which they have bought from existing traders and simply increased the price (this has an impact on inflation too; you may have noticed that is</li> </ul>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 3</i></p>	No

			<p>currently a bit of a problem?)</p> <ul style="list-style-type: none"> <li>- Whilst folk week is a different sort of week in the life of Sidmouth and the existence of stalls on the front is an acceptable part of that, they are not needed throughout the year; the prom is a lovely place to walk unhindered by sellers of food and “tat”</li> </ul>		
9	HP1	Lifting of prohibited streets in Sidmouth	<p>I would like to register my support for traders to be able to apply for a licence to trade on the promenade. This would draw in visitors to the town and add vibrancy and interest. I also feel that this would have a 'clustering' effect. By this I mean that stalls on the seafront would attract more footfall which would then benefit local shops. The issuing of licences should not be seen as competition.</p> <p>This would provide creative local people with a means to sell crafts and other items. Sidmouth needs cheering up and more dynamism! Please let this happen!</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Support 2</i></p>	No
10 page 20	SSEVE 1	General	<p>This is a response from StreetScene, not just myself.</p> <p>*In relation to 4.1 C, we will often grant land owners permission, subject to 'insert requirement'. We will make sure this requirement is in place before the event takes place. Hopefully, this will not impact your need for formal land owner permission.</p> <p>*In relation to Avoidance of Annoyance 6.27, ' fumes or litter to households and businesses'. Could this be considered instead 'or litter to households, businesses and public land'</p> <p>In regards to Enforcement 6.5, the StreetScene teams will not be able to assist with physical enforcement. Other than providing support and guidance to the Licensing team.</p> <p>*In regards to Public Liability Insurance, the events team require a minimum of £5 mil, not sure if you want to include that! Appreciate only a small amount of your traders are on EDDC owned land, so it may not be worth it.</p> <p>*In regards to your application fees, we just wanted to make you aware that the</p>	<p>Response Noted</p> <p>*Changes added to the draft policy</p> <p>EDDC Events team may have legal responsibility to ensure standards or enforce for/at events arranged by the Events team on EDDC land.</p> <p>Streetscene did not provide a written response to extend trading periods on</p>	YES

			events team application fee is non-refundable. We chose to do this, as we have still had to do the initial work.	Sidmouth seafront.	
11	DB1	Lifting of prohibited streets in Sidmouth	<p>I wish to object to the Council's intention to expand the trading arrangements in Sidmouth</p> <ol style="list-style-type: none"> <li>1. The present restrictions have been successfully in force for many years, I see no good reason for change.</li> <li>2. Have there been any valid reasons given for this change?</li> <li>3. Many Sidmouth shops are small businesses which help to make the ambience of the town that little bit different from others in ED.</li> <li>4. Extension would do the opposite to "enhancing the ambience and environment". It would just standardise trading in all towns.</li> <li>5. Extension would not provide local "economic benefits" - it would take business away from local traders and create possible congestion when set up.</li> <li>6. ? traders with "pop up" stalls etc would not add the "ambience of the town" and</li> <li>7. it would result in unfair competition to local based businesses who pay high outgoings in Council Tax, rent and running costs</li> <li>8. What about Buy Local!</li> </ol>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p>.</p> <p><i>Sidmouth Objection 4</i> Written response</p>	No
12	SB1	Lifting of prohibited streets in Sidmouth	I very strongly object to the current proposals to allow street trading on the Esplanade and in the town. Locals and visitor wander through the town, along the esplanade and Connaught Gardens for relaxing, street free couple of hours. Please, please don't make us like Blackpool or Scarborough.	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 5</i> Written response</p>	No
13	SIDTC 1	Lifting of prohibited streets in Sidmouth	<p>East Devon District Council's Licensing Department had notified the Town Council of the proposed changes to East Devon District Council's Street Trading Policy and ongoing consultation process. The Town Council was invited to reply to the consultation, though any individual member could also reply via the website.</p> <p>RESOLVED: That the response to the consultation is that:</p> <ol style="list-style-type: none"> <li>1. The Market Square, New Street, Old Fore Street, Church Street and The Esplanade (road only, including the turning circle at The Ham) should become Consent Streets throughout the year.</li> <li>2. The Promenade along the seafront should retain existing restrictions:</li> </ol>	<p>Response Noted to maintain the current policy (prohibitions on The Promenade).</p> <p>The TC seeks to remove certain prohibitions (See 1) whilst being an authority that can approve applications (see 3). That</p>	No

			<p>Trading permitted during the Folk Festival only.</p> <p>3. Only Town Council supported events should be considered by the Licensing Authority and no licence should be issued without the express agreement from the Town Council after being consulted on all details of the event, including a full list of prospective traders.</p> <p>4. All other roads/streets should be removed from the list proposed by the District Council as they were not considered to be suitable for street trading and applications would therefore not receive agreement from the Town Council.</p>	<p>procedure has not been adopted for any other parish or town council, being consultees for new/renewed applications.</p> <p>The powers for town councils to approve (determine) Street Trading is not adopted under legislation in the District outside Charter market arrangements in Honiton/Axminster.</p> <p>Under legislation, the determining body is the EDDC licensing authority.</p> <p>No Policy change is proposed based on all responses; designation of prohibited streets to remain.</p>	
14	MM1	Lifting of prohibited streets in Sidmouth	<p>I object to the changing of all of the current prohibited street to a status of consent streets. My view is that this will adversely impact on the experience of visitors to the town and also damage trade to current fixed premises businesses; a self propelling spiral of decline.</p> <p>I object to the esplanades status as a consent street on two grounds.</p> <p>A. IT IS PRESENTLY ONLY ALLOWED during folk week and this status indicates a whole summer season of potential trading.</p> <p>Sidmouths main attraction is the accessible and relaxed seafront with the only view being the town on one side and the sea on the other.</p> <p>B. This policy presents an opportunity to review the current esplanade trading during folk week. I think a referendum for the residents, business and commercial property owners should be recalled and people asked if they wish</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p>Respondant was informed that the Licensing Committee is the elected body (see point 7).</p> <p><i>Sidmouth Objection 6</i></p>	No

to continue FESTIVAL ONLY esplanade trading or TERMINATE all trading from the esplanade at all times including folk week.

My final point is that the consultation itself contains a number of substantial errors and omissions.

Statement 1.5

*1.5 This policy supports a street trading experience that is diverse, vibrant and adds to the social and cultural fabric of East Devon that maintains, protects and enhances our environment. The policy aims to ensure that it meets the needs of traders, residents, businesses and visitors to East Devon*

The first sentence -

1. There is no evidence presented, or research findings noted that the policy as written supports anything at all. If there is any evidence then please supply it.
2. 'A street trading experience' is not defined. The policy does not state it but this clearly should include impact of fixed premises trading experiences, access/parking etc
3. Because there is no evidence and no definitions that clearly scope the boundary if impacts of the policy there is no indication of how this will be measured in order to come to a decision.
4. The policy does not present any of the evidence based costs and benefits; even very simple one like the income generated and what it is spent on?
5. There are adjacent but also relevant policies which should be considered alongside this one such as the use of 'non streets' The Ham Blackmore Gardens etc which are used for Trading usually around specific events.
6. Market days. I would feel more inclined to support a general pannier market day on a specific day of the week or month where traders have to make a long term committment. This might be challenging because space is limited in Sidmouth but using Honiton as a model perhaps small pitches could be found in specific street places rather than one central gathering? - just a thought. DO not even think about using car parks for this purpose.

Second sentence

6. There are 4 different groups identified whose needs are to be ensured. This is disingenuous as these different constituencies needs are not aligned. It is for elected councillors to make a judgement on these competitive needs in a way they feel is the best balance of outcomes.

			<p>7. There is no councillor noted as the sponsor/lead for this policy area and this should be corrected with the relevant councillor identified.</p> <p>Please advise me of the councillor responsible</p>		
15	JS1	Lifting of prohibited streets in Sidmouth	<p>I object to the Promenade being used for pop-up stalls at any time other than for the Folk Festival week, because it would not be “sensitive to the needs of residents” and would also constitute unfair competition for premise – based businesses in the town, who have to pay (sometimes crippling) business rates. It would only benefit visitors to the town.</p> <p>The Promenade and beaches of Sidmouth are enjoyed by residents and visitors alike.</p> <p>Once a year, the great spectacle of the Sidmouth Folk Festival arrives bringing with it live music, theatre, magicians, street food and pop-up stalls along the Promenade. Peaceful Sidmouth becomes bustling (some might say overcrowded), and noisy – something we are not used to. There is so much to see and hear and do, that, as a resident I can overlook any inconvenience (i.e. car parks full, and crowds of people blocking the Promenade), because I truly enjoy having such a brilliant Festival on my doorstep.</p> <p>There are a few other Promenade – based activities throughout the rest of the year (i.e. the Air Show), but I feel that, at the moment, these are carefully considered and organized, and therefore do not alter the relaxed character of Sidmouth. Allowing more pop-up stalls on the Promenade would change all this.</p> <p>At the moment I pay a huge amount of Council Tax, and wonder what benefit us residents get from that. We should not run Sidmouth primarily as a tourist attraction to the detriment of residents, because it seems to me that tourists do not contribute at all to the already over-burdened infrastructure of the town.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 7</i></p>	No
16	RM1	Lifting of prohibited streets in Sidmouth	<p><b>ORGANISATIONS NAME REMOVED</b> is a not-for-profit group that exists to promote and encourage art in Sidmouth and surrounding area. On behalf of the committee I would like to support the proposal to allow traders to apply for licenses to sell their wares on the Esplanada, Sidmouth. We feel it is important</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 3</i></p>	No

			to support local commerce and small businesses, to encourage people in the town and promote diversity.	<i>Written response</i>	
17	KM1	Lifting of prohibited streets in Sidmouth	I love street markets. I understand shop owners could be worried, but if I go to a market I would always use the shops too, and have a coffee. It makes a town more vibrant and lively. Towns such as Totnes and Bridport and Honiton don't seem to suffer, in fact the street markets appear to be a benefit to the town	Response Noted No change to policy is proposed <i>Sidmouth Support 4</i>	NO
18	BH1	Lifting of prohibited streets in Sidmouth	Yes I am happy about street trading as long as they properly located within the town or sea front. It could give the local trade an extension to their present trading location. During the holiday season its good for holidaymakers to be able to trade locally and its adds a extension for local people to enjoy market days.	Response Noted No change to policy is proposed  <i>Sidmouth Support 5</i>	NO
19	MW1	Lifting of prohibited streets in Sidmouth	I am wholeheartedly in favour of this change. It will add variety to Sidmouth a 'go to' place for families and a younger demographic.  It will also add to the event offer in the town which will benefit the retail and hotel sector.	Response Noted No change to policy is proposed  <i>Sidmouth Support 6</i>	NO
20	JG1	Lifting of prohibited streets in Sidmouth	To whom it may concern, I have read the draft policy with interest and I can understand the motivation for making the proposed changes. However, the range of streets (almost all of the town) seems excessive and I would urge the Council to reconsider the scope.  Trading on the Esplanade is an attractive proposition, but only if the Council can provide the necessary frequent street cleaning and maintain the thoroughfare of the Esplanade. At the moment, even at Folk Festival time it is difficult to use the Esplanade for leisure/pleasure, in my view semi-permanent trade stalls all through the summer would make the Esplanade very unattractive to residents - who maintain the economy of the town out of season.  Food and drink stalls would directly compete with the town (which already has an oversupply of such premises) and would also mean smell and litter. Selling alcohol brings its own problems. The Council ought not be considering exploiting the Esplanade as a source of 'tourist tat'. A regular Farmer's Market	Response Noted No change to policy is proposed  <i>Sidmouth Objection 8</i>	NO

			<p>might be welcome. The attraction of Sidmouth is that it is (largely) unspoilt. It does not have the 'attractions' of other less salubrious seaside towns. It is known for the elegant panorama of the beachfront buildings - it seems self-defeating to do something that would impinge so much on that 'unspoilt' selling point.</p> <p>The policy does not lay out how increased parking requirements would be dealt with, nor lavatory facilities for increased visitors, nor Policing at evenings and weekends, nor increased (overnight) street cleaning. All of which need open consideration before this policy is adopted.</p> <p>The beauty of Sidmouth is its relative peacefulness, and the fact that it doesn't pander to the worst excesses of tourism. I hope it stays that way.</p> <p>Thank you for the opportunity to comment.</p>		
21 page 26	CH1	Lifting of prohibited streets in Sidmouth	<p>I think the idea of having on street trading in the summer months can only be a good thing. It would be an added attraction for the town, which can only be a good thing.</p> <p>If it's organised properly, I can't foresee any problems.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 7</i></p>	NO
22	GWN1	Lifting of prohibited streets in Sidmouth	<p>Street Stalls should not be allowed on Sidmouth Esplanade particularly in Festival Week. Sidmouth Festival makes a limited contribution to the town, despite what they claim, even though the residents make a substantial contribution to the organisers - who are not residents of the town and "take" all the profits back to Hampshire where they reside and operate. Many stalls are unsightly, they reduce the walking width of the Esplanade and are not necessary.</p> <p>Sidmouth has sufficient retail outlets in the town selling a comprehensive range of goods and fast food and drinks within close proximity to the Esplanade. The Town needs these outlets to continue to trade and prosper to the benefit of ALL tax paying residents.</p> <p>You should refuse any application.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 9</i></p>	NO
23	QQ1	Lifting of prohibited	<p>I wish to express my opinions of the street traders who inhabit the esplanade at Sidmouth during festival week:</p>	<p>Response Noted No change to policy is</p>	NO

		streets in Sidmouth	<p>I have attended the festival since 1971, and previously day tripped it for some years. I also am a member of a local morris side who have danced on the esplanade on the first Sunday of the folk festival, whenever that may fall in the calendar, along with other morris sides. My first dance on the esplanade was in 1978. We meet friends there who we might only meet once a year, often meeting up for many years. Many people come to watch this one-off event on the Sunday at Sidmouth. Also, our morris side has been booked to perform by the festival on the esplanade on the Sunday of folk week. We must fulfil this as part of our booking remit but with traders everywhere, it is extremely difficult to do.</p> <p>Some years back all of a sudden there were traders all along the esplanade. Our 'tradition' of dancing was seriously impacted, and at times impossible. The traders take up room, seem to be annoyed that others might want to use the esplanade and to put it bluntly, are a downright nuisance. People walking along the esplanade get caught up in the blocked pathways and all in all it is at times unpleasant. Essentially they ruin the event for us and others who travel into the town to watch the dancing.</p> <p>Whilst I understand the traders need to make a living, the impact on one single day means it is difficult for us to continue using the esplanade, which we have done for a very long time - which I have done for 45+ years, others before that. I can assure you, others who attend the Sunday event whether it be to watch or to dance have similar opinions to this, they wish the traders were not there. Therefore, for me, I would prefer it if the traders were not encamped on the esplanade, and certainly not on the first Sunday of the festival whenever that might occur.</p>	<p>proposed</p> <p><i>Sidmouth Objection 10</i></p>	
24	AH1	Application Fees	<p>To whom it may concern. I would like to add my concerns regarding the new fees for street trading licences. We have had a street trading licence for nearing 5yrs from EDDC, in the last year it is getting more and more difficult to keep trading, the cost of goods and fuel have in some cases more than doubled.</p> <p>There are vendors going out of business daily and I believe that to add more expense to an already struggling industry would all but kill it off entirely.</p> <p>Please reconsider adding fees or at least postpone them until prices stabilise.</p>	<p>Fee Objection</p> <p>Response Noted No change to policy is proposed</p> <p>The need to set application fees is proposed within the report</p>	NO

25	PRP1	Lifting of prohibited streets in Sidmouth	We wish to object to the proposal to allow licensed street traders along the Sidmouth Esplanade during the summer months, as a designated 'consent street'. For the volume of pedestrians, especially during the summer months and at holiday times, the Esplanade is too narrow for this to be viable. Stalls selling items or hosting events would mean further overcrowding of the seafront and hold up the flow of pedestrians trying to walk along the seafront or access the beach.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 11</i>	NO
26	MW2	Lifting of prohibited streets in Sidmouth	Yes please. Regenerate our towns. Buying on line is the new shopping. Town stores are closing down. The empty shops could be come living accommodation. With a living population. Markets can provide people with jobs and business with opportunities.	Response Noted No change to policy is proposed  <i>Sidmouth Support 8</i>	NO
27 page 28	M1	Lifting of prohibited streets in Sidmouth	I would heartily welcome street trading in Sidmouth & Exmouth along the sea fronts as I believe this would create & add value and interest to our seafronts, enhancing visitor appeal & attraction, actually adding to prosperity to local businesses also.  It would prosper & support our local small businesses, craftspeople & artisans as well as foster greater community spirit & "shop local" values.  Let's have a public vote! And let's warmly welcome street trading Sincerely (Exmouth resident)	Response Noted No change to policy is proposed  <i>Sidmouth Support 9</i> <i>Exmouth Support 1</i>	NO
28	PC1	Street Trading in Exmouth	Whilst I can see the benefits of allowing street trading I believe that any stalls should be complementary to what is already provided by the existing Shops/Food outlets. To allow street traders to provide food, for example, where we already have many food outlets, fish, meat, & drinks suppliers (both off sales and on site / non alcoholic or alcoholic) many of whom are struggling to survive is effectively going to lose them their vital trade for which you already receive rates/rents. Charity Stalls etc also need to be considered as not essential as there are so many charity shops in our town. They already have sufficient exposure in our town and don't need more!	Response Noted No change to policy is proposed  <i>Exmouth Objection 1</i>	NO

			<p>Any stall holder selling arts and crafts, which is not available elsewhere in our town should be encouraged, but again it must be made clear to any potential stall holder that they must not sell goods already available within the area where the street trading is taking place.</p> <p>It is obvious from past experience that the stalls have not been complementary to the existing local shops but have sold exactly the same products as the local shops, usually at inflated prices.</p> <p>I hope that these matters will be considered in particular when these stalls are in the Strand which is surrounded by shops/food &amp; drink outlets, all of whom suffer a downturn in trade when these markets are in place.</p> <p>I am not, nor have any interest in any local business but am merely a local resident who can see the injustice created by indeterminate street traders effectively stealing their trade. It also is a smack in the teeth for them when you collect rates/rent from them, then get additional fees from the street traders!</p>		
29 page 29	JE1	Street Trading in Exmouth	<p>This is a controversial policy. It has many traders who are against street trading as the stalls do not have the 'overheads' they have.</p> <p>I presume you will be charging stall holders per day/week/month etc. This to be on size of stall or if it competes with an existing business in some way – certain items. Will existing businesses within the Town can have a street trader stall in the centre away from their base. Can a group of businesses get together to have a joint event of stall holders? Charities should be charged at 50% less. Are there to be specified places that street trading will be allowed? Prices must include the cost of removal of litter and other waste.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Exmouth Objection 2</i></p>	NO
30	T1	Lifting of prohibited streets in Sidmouth	<p>I note the council review for street trading and wish to register my displeasure. As a business owner I pay for the premises in which I trade and also make sure I adhere to all policies in relation to environmental health and health and safety . The projected costs to the vendor of operating as a street trader are much lower than my costs to trade and the quality and standards of operation are often lower than those that can be enforced within businesses trading in the town - whilst I am used to competition I believe it should be on a level playing field and would also like to point out that the majority of businesses in</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 12</i></p>	NO

			<p>sidmouth make most of their money between May and September the same period you are looking to allow traders to utilise selling in prime pitch's at sidmouth - yet you expect established businesses to still pay costs 12 months of year to trade all you will achieve is undermining established businesses by allowing outsiders in to trade during our prime months ! This will lead to more local businesses closing and the resultant loss of rates to the council ! Like the massive increase in parking charges last season that scared customers away from the town this is another example of a miss thought-out proposal that undermines local business so that the council can try and make a cash grab ! If you look at the number of cafes currently for sale in sidmouth you might see how hard trade is - yet you currently let mobile food businesses trade with impunity - paying no rates no tax not being checked for environmental health issues , paying no rent and effecting established businesses who have to shoulder costs on an unfair trading basis !</p>		
31	CB1	Lifting of prohibited streets in Sidmouth	<p>In a town with a dedicated market place this works well. But otherwise this is not a good idea. For instance in the example shown of Sidmouth this will spoil the seafront, cause congestion and litter. It will not be helpful to local traders either. Parking is another factor. For traders and visitors. No thank you.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 13</i></p>	NO
32	PF1	Lifting of prohibited streets in Sidmouth	<p>Personally I think that some limited street trading could be allowed, but only, along the Esplanade, The Ham, Market place and Fore St, and just maybe in Connaught and Blackmore Gardens, for a trial perion. All others should remain closed to street trading.</p> <p>Some degree of sense must be observed and streets which are narrow e.g Prospect place, York St, Church St etc. or narrowed by virtue of homeowners parking cars outside their property e.g. All Saints Rd, Coburg Rd also major roads and bus routes e.g. Temple St/Vicarage rd, must surely be still a no-go area, sense must prevail.</p> <p>Also it should be for a trial 12 months to ensure that the few independent traders who we still have are not driven out of their precarious businesses.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 10</i></p>	NO
33	JG2	Lifting of	<p>I have just read the article about changes to licences for street traders and I</p>	<p>Response Noted</p>	NO

		prohibited streets in Sidmouth	think we should welcome these kind of events which often showcase local produce and products and brings interest into the town. I live in Exmouth and as a holiday venue I think the more we can provide for visitors the better	No change to policy is proposed  <i>Exmouth Support 2</i>	
34	MC1	Lifting of prohibited streets in Sidmouth	<p>As a resident of Sidmouth and enjoying the stalls during Folk Week each Year I would strongly oppose their existence on the Esplanade for any further period as it would change the wonderful visual and practical image and usability of the sea front and its pleasantly crowded area during all summer months. Such stalls are not always perfectly kept and contained and do severely restrict the capacity of the walking area.</p> <p>I have no objection to these being allowed in car parks and other areas but not the Esplanade which should remain sacrosanct.</p> <p>A compromise would be to allow them on the areas of the Ham where there is far more room and spare area- even on the paved areas thereto and far fewer walkers extend to there. It could in fact enhance that area!</p> <p>Please do not spoil the established and cherished image and value of the Esplanade.</p>	Response Noted No change to policy is proposed  <i>Sidmouth Objection 14</i>	NO
35	SW1	Lifting of prohibited streets in Sidmouth	<p>I am a resident of Sidmouth. I am firmly against the proposal that will allow Sidmouth Esplanade to become a 'consent street' – allowing traders, with EDDC's permission, to sell products between May and September.</p> <p>The current policy that restrictes trading to one week during Sidmouth Folk Festival works exceptionally well during the busy folk week.</p> <p>However, the impact on the esplanade is considerable and the chaos caused when the traders park their vehicles to in the narrow road leads to a high risk of accident.</p> <p>Sidmouth works hard to showcase itself as an upmarket regency seaside resort with 4 star hotels and good quality shops. This image is at high risk of being destroyed by tacky stalls selling merchandise that is unregulated,</p>	Response Noted No change to policy is proposed  <i>Sidmouth Objection 15</i>	NO

			frequently of questionable quality and portrays a poor image of one of Devon's most respectable resorts.		
36	CP1	Lifting of prohibited streets in Sidmouth	I think this is a great idea. It occurs on the continent and enhances the atmosphere of the town. I'm sure it would do the same here, and have a beneficial effect for existing shop owners. I welcome this sensible proposal. It would benefit, locals and visitors alike, and create a lovely shopping environment for all.	Response Noted No change to policy is proposed  <i>Sidmouth Support 11</i>	NO
37	JC1	Lifting of prohibited streets in Sidmouth	There are already plenty of shops in Sidmouth covering a wide range of goods. We do not need these traders cluttering up our streets. Pack them off to Exmouth!	Response Noted No change to policy is proposed  <i>Sidmouth Objection 16</i>	NO
38	JAA1	Lifting of prohibited streets in Sidmouth	We strongly object to the proposal to allow street trading along Sidmouth esplanade, or anywhere else in the town centre public areas.  The imposition of the sort of trading that occurs during the Folk Festival is more than enough for a town with so many full-time local shops, paying year-round business rates/taxes already.  Given the recession hangover from the pandemic, this would be yet another set back for the local businesses, which might ultimately lead to the loss of cherished town character, and a 'ghost town' of corporate chain stores and empty units.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 17</i>	NO
39	AN1	Lifting of prohibited streets in Sidmouth	I have no objection to the current arrangement during Folkweek but do object to other times. The esplanade should be kept uncluttered with room to sit, walk and enjoy . We have enough good shops selling a variety of quality items and all paying business rates, rent and upkeep. All have had a struggle during recent years and are just beginning to recover. I don't know how it can be claimed that it will help local businesses. Pavements and roads are not very wide and should be left for pedestrians, children's buggies and wheelchairs Please refuse it.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 18</i>	NO

40	AP1	Lifting of prohibited streets in Sidmouth	Great idea. Always head for the street markets in France!	Response Noted No change to policy is proposed <i>Sidmouth Support 12</i>	NO
41	RN1	Lifting of prohibited streets in Sidmouth	The don't agree for the following reasons. (1) It would take away trade from the local shops. (2) Based on 'The Tat' that is sold during Festival Week the stalls are just cheap rubbish, and to be honest it is more like a Car Boot Sale. (3) This would not impede on pedestrians and restrict the access (even on the promenade of Sidmouth). (4) Sidmouth Promenade is for the pleasure of local people and visitors alike and not matter what time of year the Promenade is always very busy.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 19</i>	NO
42	AW1	Lifting of prohibited streets in Sidmouth	I would like to object to increased street trading in Sidmouth. It's bad enough during folk week along the front but the proposal to have it all over Sidmouth would cause havoc. It is not fair on the shop owners either who have high rates and overheads to pay.	Response Noted No change to policy is proposed <i>Sidmouth Objection 20</i>	NO
43	GH1	Lifting of prohibited streets in Sidmouth	Having read the recent newsletter to residents article regarding street trading at Sidmouth could I please make the following statement: I would NOT be in favour of street trading between May - September as I feel it is Grossly Unfair to the existing businesses who have faced an incredibly difficult and challenging few years and are now faced with ever increasing over-heads. Those businesses who have survived the challenges so far should be fully supported by local authorities and NOT given an additional challenge of casual/season opposition who do not face the same overheads (eg business rates, energy costs, premises insurance, rent increases etc). The diversity of our existing high street should not be compromised with seasonal traders who do not have the same community connections or ethos to those who trade in the town all year.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 21</i>	NO
44	CB2	Lifting of prohibited streets in Sidmouth	A good idea to have a few stalls to complement the towns shops and allow for small individual traders in Sidmouth I would especially like to see a regular general market in the Strand gardens at EXMOUTH as I think it would draw in visitors.	Response Noted No change to policy is proposed <i>Sidmouth Support 13</i>	NO

45	RR1	Lifting of prohibited streets in Sidmouth	As a trader in new street. I think it is an insult to those of us who pay huge rent and rates year round to provide our live.	Response Noted No change to policy is proposed <i>Sidmouth Objection 22</i>	NO
46	AM1	Lifting of prohibited streets in Sidmouth	<p>People come to Sidmouth on holiday because it is a unique town where walking along the seafront without traders is the main reason that they come. Allowing street traders on the seafront except for Folk Festival will destroy the image of the town, the people will not come in the future and the view of the unique seafront will be destroyed.</p> <p>Having lived in Sidmouth since 1969 I was amazed that you allowed street traders during folk festival week, but to allow it all Summer will destroy the town. You should avoid at all costs creating a wild market of street traders in Sidmouth. As an alternative if you want to appease street traders, why not have a market in a field near Sidmouth where people who want this sort of trading can go.</p> <p>Don't spoil the seafront.</p>	Response Noted No change to policy is proposed  <i>Sidmouth Objection 23</i>	NO
47	SB2	Lifting of prohibited streets in Sidmouth	No Thank you.	Response Noted No change to policy is proposed <i>Sidmouth Objection 24</i>	NO
48	HW1	Lifting of prohibited streets in Sidmouth	I think it would be good in the Strand and seafront Exmouth. At present, cafés in the Strand take up room for walking so I suggest any stalls in the Strand should be in the centre. Stalls on the seafront should be after the Ocean as due to the cycle lane taking up half the promenade near the Octagon. BETTER STILL, GET RID OF THE CYCLE LANE NEAR THE OCTAGON COMPLETELY!!	Response Noted No change to policy is proposed  <i>Exmouth Support 3</i>	NO
49	LC1	Lifting of prohibited streets in Sidmouth	<p>I am writing to express my objection to the draft new street trading policy proposals for Sidmouth.</p> <p>I would like to start by saying that there has been insufficient publicity about</p>	Response Noted No change to policy is proposed	NO

			<p>these proposals. I learnt about them today in the EDDC residents newsletter, there has been nothing in the Sidmouth Herald or local social media and I believe that EDDC should make residents and local businesses aware of these significant changes before they are agreed.</p> <p>1. Sidmouth Esplanade - Proposal to allow street trading throughout the summer. This will increase litter, block the view of the seafront and block the walkway for pedestrians. It will also add to the traffic on the seafront due to loading and unloading as stalls are set up. All of these things currently happen in Folkweek but it is bearable for one week a year. It will also discourage visitors from walking into town and will therefore affect local traders at a time of year when they rely on visitors for trade. In short this proposal will damage the town.</p> <p>2. Proposal to change 33 other streets in the town centre and beyond to consent streets.</p> <p>I object to this proposal for the same reasons as the Esplanade i.e. increased litter, potential loss of local trade and increased traffic. In addition the proposals will affect narrow residential streets not merely those in the town centre but roads such as Salcombe Road and Sid Road which are completely unsuitable for any type of street trading even on an occasional basis. There is very limited parking on these streets and narrow pavements. They are totally unsuitable for street trading.</p>	<i>Sidmouth Objection 25</i>	
50	AR1	Lifting of prohibited streets in Sidmouth	<p>Street Trading - I think this is a fabulous idea. Great idea for Sidmouth bringing people new products outside creating a wonderful vibrant atmosphere for locals and holiday makers</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Support 14</i></p>	NO
51	GF1	Lifting of prohibited streets in Sidmouth	<p>I don't think street trading will benefit Town Where shopkeepers pay rent and council tax It would be unfair and may drive them to close their business I think the council should look into this more</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Objection 26</i></p>	NO
52	JM1	Lifting of	<p>I am a local resident ( Sidbury ) &amp; my elderly mother lives in the town centre</p>	<p>Response Noted</p>	NO

		prohibited streets in Sidmouth	(Sidmouth). We both shop locally & support our local shops. We do not agree with the increase in consent streets which are in residential streets of the town - there would be obstructions of footpaths, increase in rubbish & of course outside pop up stalls could come & take trade away from our already struggling shops who have additional overheads such as rates, staff, building insurance etc which a pop up trader would not have. EDDC please support our existing hard working shops / businesses & look after our residents & do not go ahead with the consent streets.	No change to policy is proposed  <i>Sidmouth Objection 27</i>	
53	NB1	Lifting of prohibited streets in Sidmouth	Sidmouths unique and delightfully traditional seaside would be destroyed by increased street stalls. If you wish to see more shops, cafes, Pubs and restaurants close the weakening of controls on stalls all over Sidmouth will be the result.	Response Noted No change to policy is proposed <i>Sidmouth Objection 28</i>	NO
54	IH1	Lifting of prohibited streets in Sidmouth	I wish to register my opposition to the proposal to turn almost all Sidmouth's roads to 'Consent Street' status. They fill up half the walk way leaving small areas where the dancers & buskers are allowed on the sea front and causing grid lock and pushing people out into the road. The Esplanade used to be full of dancers & buskers now it's full of tat that blows away in a firm breeze. Why not put them on the Ham with the Marque or at the end of the Esplanade from the Lifeboat station and let us have the prom back for the entertainment of the crowds And a burger bar? We have plenty of fast food availability from the clubs, pubs & hotels plus the excellent little group in the Bedford Carpark and at Kenaway House.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 29</i>	NO
55	TW1	Lifting of prohibited streets in Sidmouth	If one were to look at the towns within Devon that have St market's, they seem to coordinate well. However, these are long-established, well-known market towns such as Honiton. This allowed overtime an element of coordination between shops and market stalls that seemed to know what <u>local.shops</u> sell, and therefore, what is available within the market is not sold by local shops and would not take away trade.  The town of Sidmouth is not a market town, and this has been tried in the past (Brewer Lane, early 1980 on the old Brewer land ) This was met with much disagreement by local shops and did only just last one month.	Response Noted No change to policy is proposed <i>Sidmouth Objection 30</i>	NO

			I feel if it is to be encouraged, then on a Saturday twice a month is probably more than enough for the town. This may encourage new business and the opportunity for local craft people to exhibit their work cheaply. Also, local charity's to fundraise.		
55	SKT1	Lifting of prohibited streets in Sidmouth	No to street trader licensing	Response Noted No change to policy is proposed <i>Sidmouth Objection 31</i>	NO
57	HW2	Lifting of prohibited streets in Sidmouth	As a resident of east Devon for some 50 years I enjoy the existing street markets and think that the addition of craft/ food stalls for events during the summer months will make out towns feel lively and bring in much needed tourists and locals alike to the centres. Whenever I have been to a food fair or stalls in Seaton, Sidmouth and Honiton there has been a great bustling happy buzz about the town. - a really good addition in the current climate to general well-being and happiness	Response Noted No change to policy is proposed  <i>Sidmouth Support 15</i>	NO
58	VO1	Lifting of prohibited streets in Sidmouth	I don't feel the town needs street trade as proposed. The local shops need more support not less. Maybe a local monthly market event with specific guidelines that products are East Devon only. Creating local support, good green footprint and a USP for the town to attract more spend in town.	Response Noted No change to policy is proposed <i>Sidmouth Objection 32</i>	NO
59	LP1	Lifting of prohibited streets in Sidmouth	I have just read your proposal to allow street trading on streets in Sidmouth including were I live on Fortfield Terrace, EX10 8 NT Litter and lack of parking places for residents would be badly affected ! Also it would take away trade from businesses that already pay really high business rates in Sidmouth already and are struggling. I strongly disagree with this proposal	Response Noted No change to policy is proposed  <i>Sidmouth Objection 33</i>	NO
60	AT1	Lifting of prohibited streets in Sidmouth	I am <b>ORGANISATIONS NAME REMOVED</b> . We strongly oppose the proposal to turn almost all Sidmouth's roads to 'Consent Street' status, the current arrangements seem to work well, we consider that currently the right amount of control over street trading is applied.	Response Noted No change to policy is proposed <i>Sidmouth Objection 34</i>	NO
61	JS2	Lifting of prohibited	Whilst I might support the idea behind this proposal being that of encouraging independent traders, I object to our beautiful Esplanade being transformed into	Response Noted No change to policy is	NO

		streets in Sidmouth	<p>a street market.</p> <p>We have some amazing shops in our town and would like to see these supported by our Council to ensure that our High Street does not become a ghost town of empty shops or charity and coffee shops. It's lovely to see these 'pop up' stalls during Festivals but do really feel that anything more than that will spoil the unique ambience that Sidmouth Esplanade currently enjoys.</p> <p>I really would not want to see our beautiful town embracing this proposal. Can we not Instead source somewhere that could become a permanent market place where these traders could be? Many thanks for taking time to read these comments,</p>	<p>proposed</p> <p><i>Sidmouth Objection 35</i></p>	
62	TG1	Lifting of prohibited streets in Sidmouth	<p>I feel that street trading on the esplanade, other than folk festival, should most definitely not be allowed. A farmers market in the market place or Anchor yard/ old fire street would be great. But PLEASE not the esplanade</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Objection 36</i></p>	NO
63 page 38	CP2	Lifting of prohibited streets in Sidmouth	<p>I would like to Oppose against the proposal to Allow Street Trading along Fortfield Terrace.</p> <p>Fortfield Terrace residents already suffer with footfall from the Cricket club, Tennis Club, Croquet club, Gentlemen Club all who have members or Parents of kids clubs, Swimmers all parking on the terrace without permits, leaving their cars on the terrace while they go for a walk or into town.. We have the additional footfall from the parking and events ie folk week parking, classic car, red arrows parking.</p> <p>To have street traders outside our homes will be another added noise and rubbish problems.</p> <p>The pedestrian walkway I believe is not owed by Sidmouth council and again we suffer with periods of time when footfall is increased, children with their bikes and scooters jumping off the stones walls and hand rails causing damage.</p> <p>As residents we do our best to keep our area of Sidmouth clean and tidy</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 37</i></p>	No

			<p>spending a lot of funds on caring for grade 2* properties which obviously benefit the public of Sidmouth. To then have street traders outside our homes or on the No through road which would require proper planning and consultation with residents if the council are planning to reduce our parking spaces.</p>		
64	SP1	Lifting of prohibited streets in Sidmouth	<p>I strongly object to any street trading as it is in immediate competition with the local shops who are already struggling, and have to pay high business rates plus overheads. Councillors are out of touch with local businesses. It would also make the town scruffy.</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Objection 38</i></p>	No
65	JS3	Lifting of prohibited streets in Sidmouth	<p>I am writing to object to stalls of any kind on the esplanade at Sidmouth for the following reasons: The stalls would take income away from the local shops who pay business rates. My friends and I come shopping regularly at Sidmouth for the small and individual shopping they provide through out the year. The space for sitting and watching the sea on the front would be reduced. Sidmouth is always busy, the space for people, dogs, push chairs and wheel chairs could become crowded and difficult to navigate. If the stalls sold food on a regular basis, this would increase litter, have you got the facilities to clear this up ? The comparison with Honiton is not valid, there are very few stalls, Honiton is not so busy, doesn't attract the same number of visitors as Sidmouth does as a sea side town. Special occasions with stalls such as a fair/ music festival is one thing, please don't spoil lovely Sidmouth just to increase revenue. Please think of the unintended consequences of such a change.</p>	<p>Response Noted No change to policy is proposed  <i>Sidmouth Objection 39</i></p>	No
66	DT1	Lifting of prohibited streets in Sidmouth	<p>Please accept by way of this email my objection to the proposals for changes to street trading consent in Sidmouth. Not only will this impact upon the wonderful independent traders who trade from premises and are already struggling in the current economic climate but it will also put an additional strain on parking. There is already insufficient parking to meet need for the majority of the year and this lack of spaces for both residents and visitors will be compounded if on street parking is compromised due to the streets being used for trading. There will also be an additional need for and cost of providing</p>	<p>Response Noted No change to policy is proposed  <i>Sidmouth Objection 40</i></p>	No

			waste bins, litter collection and street cleaning in the areas where trading was happening.		
67	SB3	Lifting of prohibited streets in Sidmouth & proposed admin fee	<p>My response is to maintain the status quo, which is working to a good level of satisfaction all round and was well discussed on its implementation. I do not agree to any further streets being re-designated Consent Streets under your Plans. The idea that trading could take place in some of the streets you listed is risible. There's simply no room for all proposed users to be accommodated. Also, it will ruin the atmosphere for which Sidmouth has become a destination resort.</p> <p>Finally, your fees (£25 to £45 for each location) will hardly create a significant difference to the income of EDDC and will give EDDC staff (of which you are short I understand) more work to administer, so please do not do it in the first place. My question is for whose benefit would it be? Not EDDC with those proposed fees, not traders in the town who are hard pressed as it is and not for visitors. It would appear that you are putting the needs of a few itinerant traders before those who 'pay their rates'.</p> <p>I reiterate, please leave the situation at status quo.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 41</i> Fee Objection</p> <p>The need to set application fees is proposed within the report</p>	No
68	JL1	Lifting of prohibited streets in Sidmouth	Against street trading. I am horrified at the idea that the peace of Sidmouth be turned into a "Blackpool" of the south. Not only would the parking problems dramatically worsen but the litter generated would be vastly increased as would the noise. No, no a thousand times no to street trading on Sidmouth's streets.	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 42</i></p>	No
69	RG1	Lifting of prohibited streets in Sidmouth & proposed admin fees	I'm positive about the proposals, as street traders will bring life and colour to the townscape. Fees will need to be modest— affordable for small traders.	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 16</i> <i>Support for fees</i></p>	No
70	SB4	Lifting of prohibited streets in Sidmouth	I have noted that consideration is being given given to increasing street trading in Sidmouth and wish to indicate, as a resident, that I am totally opposed to this. The current level of street trading is just right for Sidmouth. It gives opportunities to street traders and provides an amenity for residents and	<p>Response Noted No change to policy is proposed</p>	No

			<p>visitors without the negative consequences that would follow an increase including:  Litter  Vermin  Environmental degradation and negative impacts on wildlife  Reduction of space for walking and enjoyment of the Sidmouth environment  Overcrowding and attracting visitors who are looking for an 'urban' experience rather than the natural aspect and cultural ambiance of Sidmouth  Threat to the viability of Sidmouth's current retail and service provision.  Please do not permit this in our town.</p>	<i>Sidmouth Objection 43</i>	
71	HB1	Lifting of prohibited streets in Sidmouth	<p>Thank you for asking the views of local Sidmouth people on the consideration of street trading in Sidmouth all summer. I have lived in Sidmouth for seven years and was at Sidbury for nine years before this.  It is a beautiful place to live and supports a wide range of shops, eating establishments and amenities. My understanding is that, in line with other High Streets in towns across the country, some shops, pubs and other venues have found it difficult to maintain a working profit since the difficult times of the Covid lock downs. There are also an established range of festivals lasting from a day to a week, covering literature, music, walking, science and art.  Parking is already at a premium for locals and tourists during the summer. Providing more eating and shopping venues will only diminish the profits available to local businesses who pay rates and support the town all year around.  My view is Sidmouth doesn't need additional temporary, street vendors and I strongly oppose the suggestion. Let us celebrate our beach, esplanade, walks and amenities and keep Sidmouth as a beautiful, period seaside town which welcomes everyone who wants to visit while respecting the wide range of facilities we already have.</p>	<p>Response Noted  No change to policy is proposed   <i>Sidmouth Objection 44</i></p>	No
72	SF1	Lifting of prohibited streets in Sidmouth	<p>I would like to comment on the idea of street trading, especially as it relates to Sidmouth.   Sidmouth is not some trashy holiday town and people visit here because of the special atmosphere. If you destroy that atmosphere then everybody loses - visitors, residents, shopkeepers and businesses in general.  It also occurs to me, perhaps you haven't noticed how many empty shops there</p>	<p>Response Noted  No change to policy is proposed  <i>Sidmouth Objection 45</i></p>	No

			<p>are here. If you allow street trading, likely as not there will be more empty shops and this will further drag the town down.</p> <p>And please do not say it would be "appropriate" street trading - have you seen what is on offer in Folk Week? Just to be clear, most of it is a heap of tat.</p> <p>A final thought ... perhaps you could visit and have a look around, acquaint yourselves with a town you wish to ruin, I am sure you would find it quite educational.</p> <p>Well that's my view. Experience tells me you will go your own sweet way but I feel better for expressing my thoughts.</p>		
73	TL1	Lifting of prohibited streets in Sidmouth	<p>I have two shops in Sidmouth <b>ORGANISATIONS NAME REMOVED</b>. I'm appalled that this is even being considered. Sidmouth has had shops and other businesses closing down and struggling through hard times for years paying high rates and bills without stalls everywhere taking away our trade. This will not attract people to shop in the high street and will detract from the beauty of our lovely town. The high street doesn't do well during folk week, everyone is on the seafront and The Ham. Our weeks are busier out of folk week in the summer. I believe limited Street trading such as folk week is where it should stay and I whole heartedly oppose this Street trading policy as it would be putting myself and all my staff at risk of losing our jobs and livelihood. In my opinion this will kill the high street. The increase in parking has already made a huge dent in business with customers constantly complaining of high charges. I know friends and family that have already stopped coming to Sidmouth for precisely this reason. As it is staff are having to park a way off in residential streets aggravating the residents.</p> <p>I look forward to hearing that these proposals have been rejected</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 46</i></p>	No
74	AH2	Lifting of prohibited streets in Sidmouth	<p>I would love to see more traders especially along the esplanade as there's plenty of room &amp; would liven up the town in the summer months as they do in folk week</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 17</i></p>	No
75	EM1	Lifting of prohibited streets in Sidmouth	<p>I would like to add to my objection to the proposals of allowing year round street trading in the unique, smart and beautiful town of Sidmouth.</p> <p>Following all the obvious reasons that you are no doubt receiving about access, littering, anti- social smells of fried food, stinking, smokey meat vans</p>	<p>Response Noted No change to policy is proposed</p>	No

			<p>and the gathering of potentially large groups of people around these stalls/traders well into the evening. The whole idea generally downgrades an area.</p> <p>In recent years, Topsham has followed a similar route to this and as a former resident, it made the town a ghastly place to live come the end with noisy visitors trolling the streets late into the night, even worse parking issues.</p> <p>While I accept no town can be preserved in aspic, Sidmouth is a truly smart, unique and flourishing town, when compared to many others and adding street traders will add ABSOLUTELY NOTHING to it to its residential streets.</p> <p>Keep Sidmouth an uplifting and joyous place to live not a funfair.....it will be a downward spiral if you allow this.</p>	<i>Sidmouth Objection 47</i>	
76	JC2	Lifting of prohibited streets in Sidmouth	<p>I am writing to object to the proposal for increased street trading, which will greatly affect Sidmouth businesses.</p> <p>In addition I would propose during folk week street traders are located on the Ham, leaving the esplanade clear for performers.</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Objection 48</i></p>	No
77 page 43	SD1	Lifting of prohibited streets in Sidmouth	<p>I wish to register my objection to the granting of street trading in the areas named on the proposed plan. The objections put forward by the Sidmouth Chamber of Commerce are relevant and factual and I fully support their concerns</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Objection 49</i></p>	No
78	RE1	Lifting of prohibited streets in Sidmouth	<p>I write to provide my comments on the above Consultation. I do not support this Consultation to extend the Street Trading Proposition (although I am in favour of the current status). This is because:</p> <ol style="list-style-type: none"> <li>1. Public health and safety - I do not feel our town with its narrow streets, high extent of wheelchair and pushchair users and busy roads is going to be safe if further street trading is encouraged. What is more, I do not feel that the Council can cope with the additional demands on refuse collection and this should not be funded by the increased council tax that residents pay.</li> <li>2. I do not feel it would benefit the town to have additional street trading. I do not feel that visitor numbers would increase to the town by having the street trading. In fact I believe that numbers may decrease.</li> <li>3. I do not feel there is any benefit to residents.</li> <li>4. Our existing local businesses are already struggling to survive in the economic climate. By increasing their competition and potentially reducing the number of visitors to the town then this may further deteriorate their trading and</li> </ol>	<p>Response Noted No change to policy is proposed  <i>Sidmouth Objection 50</i></p>	No

			in turn damage our town's economy.		
79	CB3	Lifting of prohibited streets in Sidmouth	Please do not change the present system	Response Noted No change to policy is proposed <i>Sidmouth Objection 51</i>	No
80	REP1	Lifting of prohibited streets in Sidmouth	We think the proposed new street trading plans could cause an adverse effect for the town. Our shops have been struggling for sometime now due to covid problems, not fully recovering as yet & to allow street trading from other areas would cause more problems for them. The town gets very busy especially during the Summer months, which we know is good for the town but to have this added street trading will put our shops at more risk of losing customers. We also think this will put local people off from coming into the town, therefore losing regular custom there.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 52</i>	No
81 page 44	ECH1	Lifting of prohibited streets in Sidmouth	We object to the proposals to allow street trading in Sidmouth. We see no need to alter the status quo which does permit stalls on the esplanade in Folk Week. The fact that street trading is allowed in other towns in East Devon is irrelevant.. Tourists are attracted to Sidmouth because it is different and unspoilt. The roads are narrow and totally unsuitable for stalls unlike Honiton which has a wide High Street.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 53</i>	No
82	JC3	Lifting of prohibited streets in Sidmouth	I support the idea of more trading opportunities , but believe it should just be a set day per month or fortnightly .. to enable public to know when they can visit Sidmouth in the knowledge there will be street traders , so can choose whether to visit or not .  The promenade is so beautiful to walk along , but gets very busy when there are street traders which would remove the joy of having a relaxing walk . So yes more street trading but balance to retain the joy of promenade walking , people in wheelchairs , people with buggies etc .	Response Noted No change to policy is proposed  <i>Sidmouth Support 18</i>	No
83	TW2	Lifting of prohibited streets in Sidmouth	A fantastic idea. Brings an enhanced sense of community, opportunity for local business to flourish by getting more people out and about locally. The more we can do to support these initiatives, the better.	Response Noted No change to policy is proposed <i>Sidmouth Support 19</i>	No

84	SC1	Lifting of prohibited streets in Sidmouth	<p>We own a small B&amp;B in Sidmouth and we would like to register our views in respect of consent streets. We are keen to ensure that Sidmouth remains a popular location for tourists to visit and that tourists and locals alike have the facilities they need to enjoy the town. It is helpful that during the main season and during all local events additional vendors of interest and use to everyone, should be allowed to join regular traders. The way this works during Folk Week is a good example of this when local businesses and incoming street vendors all benefit. This would also potentially be true during other festivals and events. However, expanding the number of consent streets is unfair on established traders who are here all year and who have to meet high and expensive costs and environmental standards, for there to be a 'free for all' for trading in all streets in the town. Inevitably wider consent streets and access will put pressure on some traders and they may close thereby reducing the long term sustainability of the town. Local traders must benefit in the main season to enable them to continue to trade for locals in the quiet months.</p> <p>Sidmouth is a noticeably clean and tidy environment and street trade will almost certainly put increased pressure, and therefore cost, into local council services street cleaning services to ensure the litter cleaning, and bin emptying remains at this high standard which in turn attracts people to the town</p> <p>Many of the roads mentioned are ill-equipped for this type of trading. For example some do not have pavements and already there is congestion between pedestrians and traffic.</p> <p>Even if we have more consent streets approved it is essential that permission for trading is agreed by Sidmouth Council and or in conjunction with them not that EDDC can decide unilaterally</p>	<p>Response Noted No change to policy is proposed.</p> <p>See response No13 - determination of Street Trading Consents is by EDDC Licensing Team as the Regulatory Authority.</p> <p>Parish and Town Councils are consultees.</p> <p><i>Sidmouth Objection 54</i></p>	No
85	BJ1	Lifting of prohibited streets in Sidmouth	<p>I appreciate that some people believe that allowing more street traders would adversely affect local businesses. However, where I used to live there was a regular farmer's market with stalls selling local produce and this, in fact, attracted shoppers to the town and local businesses benefited. I believe this kind of farmer's market would really benefit Sidmouth, too, especially as there is now no butcher's shop in the town and only one greengrocers. Other local produce, such as cheese, honey, preserves etc would be a welcome addition.</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Support 20</i></p>	No
86	VBHC1	Lifting of prohibited streets in	<p>As a resident and owner of a Sidmouth Business I am writing to vote against the change of ruling for street traders.</p> <p>At present we have street traders during Folk Week and also in the grounds of</p>	<p>Response Noted No change to policy is proposed.</p>	No

		Sidmouth	<p>Kennaway house which works.</p> <p>1)Sidmouth is a unique and very special, unspoilt Holiday Resort. Our visitors are attracted to Sidmouth because of that and also for our varied selection of independent shops. To have street traders along our much- admired esplanade and our conservation areas would destroy that and with that some of these businesses including the Hotels.</p> <p>2)Unfair competition on local businesses who have to pay rates and meet high environmental standards.</p> <p>3)Increase in Litter and pollution.</p> <p>4)The road system is unsuitable</p> <p>5)The 'Consent Street' System has been controversial in other East Devon Towns.</p>	<i>Sidmouth Objection 55</i>	
87	JL2	Lifting of prohibited streets in Sidmouth	<p>I wish to object to your proposal to allow street trading almost anywhere in the town of Sidmouth. I feel this will finally destroy the remainder of shops we have in the town. There are already empty premises. I feel by allowing street trading these will only increase, or be filled with yet more charity shops or coffee shops that Sidmouth does not need.</p> <p>As an ex-trader in the town, I feel I can speak from experience. Sidmouth shop traders pay rates, rent premises, and employ local people 365 days a year, during the quiet seasons as well as the prime periods through the summer. They do not simply turn up to trade during the peak times.</p> <p>I have always considered imported competition during folk week, the busiest week of the year, to be an insult to the traders of Sidmouth. In years gone by, traders would prepare for folk week with extra stock and staff, but since the allowance of the 'pop up' street along the sea front, this no longer became necessary (of course this may not apply to the food and drink outlets, but even they must be hit by the temporary catering businesses that are allowed to set up). Visitors only have a certain amount of money to spend. If trading is now allowed ad hoc for a longer period, then this can only have a detrimental effect on the morale of those traders who try to keep Sidmouth special.</p> <p>I feel 'pop up' trading will probably become the future due to high rents, rates, wages and overheads incurred by bricks and mortar retail, but maybe the Council should think carefully before they agree proposals that will expediate this situation. Perhaps instead they could consider taking over some of the larger empty premises and reconstruct the indoor market concept. At least this would allow fairer competitive trading with the current shops, particularly the</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 56</i></p>	No

			independents, which 'pop up' competition does not.		
88	SAB1	Lifting of prohibited streets in Sidmouth	<p>We would like to strongly object to any additional weekly street trading and/or parking on Fortfield Terrace and indeed within Sidmouth Town Centre and the Esplanade as a whole which would be in addition to those main annual events already established with street traders at various times of the year which in themselves can cause major parking problems at the time.</p> <p>(1) Fortfield Terrace is essentially mostly flats and one or two houses(without flats) which in total comprises of 11 Regency style houses that already have serious parking problems throughout the year especially during the summer months as it is unbelievably over subscribed already with the public parking, contractors vans parking and numerous other vehicles coming and going where the residents themselves pay £30/year for a parking permit to EDDC. Increasingly and more frequently we often find it difficult to park and drive off elsewhere until spaces become available. Again this is essentially from May - Sept. each year plus all the sports events/activities that take place in the Cricket Pavilion and Tennis Club at the far end of the Terrace Cul-de-Sac throughout the year where they too have a number of membership permits that make the residents parking situation even worse at busy times. With 4 flats on average per house and each flat with a permit, plus the Cricket Club and Tennis Courts members permits, plus public parking, plus contractors parking and only 26 parking spaces available and no room for more the numbers speak for themselves, especially as there is no turning point at the Cul-de-Sac end as the road is extremely narrow and any turning is just not possible. Virtually everyone reverses out whilst others are trying to drive in and sometimes it is a complete nightmare including delivery lorries and refuse lorries that really do need access for weekly collections.</p> <p>(2) There are various elderly people living along the Terrace ranging in age from their 70's - 90's as residents with several of those using walking frames plus members of the public who frequently and daily walk up and down the terrace as a short cut to pathways at the end of the Terrace and the Sports Clubs. These elderly people as well as others should not have to carry heavy shopping from a distance not on the Terrace as is the case sometimes today as this would only be made worse.</p> <p>Any additional parking for street traders hopefully not trading on the terrace itself(as definitely no room) would make the nightmare even worse and frankly cause traffic chaos. It is also enforcement warden patrolled during the week for</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 57</i></p>	No

			<p>the public parking allowed within any of the 26 spaces.</p> <p>The quality of our lives since moving in here already suffers due to the excess traffic as we try and park or walk down the Terrace and hopefully you can see that would be made far worse by this proposal from EDDC.</p> <p>We would further add that street trading on the scale proposed would spoil the uniqueness of this unspoiled Regency seaside town and would generally cause more frequent parking problems with the traders themselves and their vans etc. as well as the residents within the town who already find it difficult to drive and walk down many of the already busy and narrow town roads especially with all the visiting tourists(which is good for business already).</p> <p>May we suggest that EDDC carry out a visual inspection at a busy period in the day as the above will then become quite obvious</p>		
89	SP2	Lifting of prohibited streets in Sidmouth	<p>As a Sidmouthian and local shopper, where I can, I personally feel that traders on the esplanade for longer than folk week would be detrimental to our own local shops.</p> <p>We have too many shutting down at present.</p> <p>Everyone one is struggling with these uncertain times and I feel we should be loyal to the shops we have with the hope of keeping them.</p> <p>Also if they are on the esplanade, prime spots, are they going to be paying the high business rates too that our shops struggle to find annually.</p> <p>I just think it will be a wrong step too far.</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 58</i></p>	No
90	RW1	Lifting of prohibited streets in Sidmouth	<p>I strongly concur with Sidmouth Chamber of Commerce's opposition to this development. I plea with EDDC to respect the arguments of the Sidmouth Chamber of Trade and Not approve nor proceed at this time.</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 59</i></p>	No
91	JM2	Lifting of prohibited streets in Sidmouth	<p>No thank you. It's hard enough to finding parking and to get about in the summer months with tourists milling about as it is. This Will just make things worse.</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 60</i></p>	No
92	PC2	Lifting of prohibited streets in	<p>With reference to Street Trading Policy Consultation 2023 I would like to make the following comments.</p>	<p>Response Noted No change to policy is proposed.</p>	No

		Sidmouth	<ol style="list-style-type: none"> <li>1. As a local resident I am completely appalled by the suggestions being made within the suggested Street Trading Policy. The Esplanade and Promenade of Sidmouth is a major key attraction of the Regency resort. It has limited length and space and the thought that this restricted space would be littered with various stalls throughout the period of 1 May to 1 September is just unconceivable. How could the addition of mobile trading stalls could be perceived as something that improves the facility for both local residents and tourists ? It would be completely detrimental to the character of Sidmouth.</li> <li>2. My comments above would also apply to any opportunity to have trading stalls on any part of the beaches.</li> <li>3. The volume of traffic and the narrow roads within the local areas do not support the proposed policy of allowing the plethora of roads to be used by mobile street stalls. It would create even more issues for parking for local residents and put even more pressures on the local car parks, for which users are paying significantly increased charges.</li> <li>4. The proposal would create completely unfair competition for established traders who pay business rates and taxes, who support our local community throughout the year. Sidmouth, like a lot of high streets are facing substantive challenges and we have a number of unoccupied sites. Such a policy would be extremely harmful to such businesses as many stalls, vans and trailers will be coming from outside the area, likely appearing at peak times and thereby taking valuable business away from existing businesses.</li> <li>5. As a previous resident in the Honiton area, I have personal experience how street stalls impact the high street. They have damaged the Honiton High Street due to an overabundance of low-quality stalls, driving business away from existing businesses and having a negative impact on the aesthetic nature of the high street. They adversely impact parking facilities and have a detrimental impact on traffic flow. I do not want this to happen in any area of this beautiful town.</li> <li>6. I am very proud of the clean and tidy nature of Sidmouth through the efforts of council staff and local volunteers. My fear is that these mobile stalls will lead to a significant increase in rubbish, pollution and will be damaging from an environmental perspective.</li> <li>7. Current situation is working well. Flexibility is shown through Folk Week, Jazz Week and Sidmouth Regatta Air Show. There appears to be no genuine benefit to change the current situation. When things are</li> </ol>	<i>Sidmouth Objection 61</i>	
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			not broken why is there any requirement to make changes ?  Overall – there is no need to make these proposed changes. As a local resident it would be a very poor decision and I will fight this all the way. I am proud to live in Sidmouth and these changes would be extremely negative		
93	GH2	Lifting of prohibited streets in Sidmouth	I would like to register my objection to any expansion of street trading outside of major festivals as I feel it detracts from the shops in town which are there all year round. Also, many of these areas are already very full in high season and taking pavement space away by putting stalls up will be very problematic.	Response Noted No change to policy is proposed. <i>Sidmouth Objection 62</i>	No
94	JP1	Lifting of prohibited streets in Sidmouth	Why or why is the council determined to distroy Sidmouth. Known for its beauty, step back in time and not like a kiss me quick another seaside town. We do not need trading on the seafront and sourounding streets. You should be trying to save our shops not take business away from them. They need our help for tourists to spend money with them. Not for us to have a seaside town full of closed shops that can not afford to open as there is no custom and parking is too expensive and difficult. Wake up and please save our town for what it's known for. A beautiful quant place for all to appreciate not full of cheep tat you can get anywhere. Stop trying to make money for yourselves and kill Sidmouth in the process. No one wants this.	Response Noted No change to policy is proposed.  <i>Sidmouth Objection 63</i>	No
95	LH1	Lifting of prohibited streets in Sidmouth	I should like to express my opinion that it would not benefit Sidmouth to have anymore street training. We are fortunate to have a variety of lovely shops but I have noticed that some shops have closed and i dont think it will help with business for those we still have.. I have also observed in other towns that rubbish is an issue when there are street traders and areas get very congested. Folk week is wonderful with all the extra stalls but this is for one week and for a specific event.	Response Noted No change to policy is proposed.  <i>Sidmouth Objection 64</i>	No
96	CC1	Folk week traders	I WOULD LIKE Too SEE THE STREET TRADERS. TAKING OUT INSURANCE and OTHER SAFETY MEASURES AS WHEN I WAS AT SIDMOUTH FOLK FESTIVAL. Several years ago. I WAS HITE IN THE SIDE OF MY FACE WITH. AN LARGE UMBRILLA. WORNBY THE WIND. IT WASNT FASSEN TO ANYTHING. I HAD	Response Noted No change to policy is proposed.  Not an objection – this	No

			TROUBLE PAIN. And HAD TO GO INTO A CAFE TOO RECOVER.	relates to folk week traders having insurance risk assessments which is overseen by EDDC Events.	
97	DH1	General response	I like the idea of street markets if well regulated and managed and happening only once a week or a month. I enjoyed Honiton street market when it use to happen. I live in Exmouth and think that a weekly street market at the clock tower end of the esplanade would be fun. (the one at the site of Premier Inn was good). I suggest few food stalls as there are already several café's and pubs close by, but art, craft, bric-a-brac would make a change.	Response Noted No change to policy is proposed.  General response about having trading in Exmouth	No
98	DS1	Lifting of prohibited streets in Sidmouth	I would like to make a few points regarding the proposed street trading in Sidmouth  Some of the roads that are within the proposal are far to narrow for stalls to be allowed and surely would interfere with the permanent shops  Would the stall holders have a permanent site fixture or will they be rotated (say weekly/fortnightly) to allow others to set up  The festival is fantastic to draw people in but even during this 'week' event, extra services are needed to help clear the mess up - How would this be managed if the stalls were allowed for a longer period of time	Response Noted No change to policy is proposed.  General questions, no clear support or objection to proposals	No
99	WM1	Lifting of prohibited streets in Sidmouth	Having read of the proposal to allow more street trading on our very special esplanade in Sidmouth, I would state my objection. Although Street Trading over the a folk Festival period has been allowed at that location ( in my view to it's detriment) a further time extension would ruin the entire Sidmouth ambience. It already spoils walking along this area and is likely to become very shoddy with much litter over a longer period of time. Please consider the unique beauty of this jewel in Devon's crown which has been treasured over so many years.	Response Noted No change to policy is proposed.  <i>Sidmouth Objection 65</i>	No
100	MC2	Lifting of prohibited streets in	I wish to VERY STRONGLY object to your proposal to extend street trading within Sidmouth. I am a local resident and highly value the character of Sidmouth. Your proposal	Response Noted No change to policy is proposed.	No

		<p>Sidmouth</p> <p>will greatly negatively impact on the town; not only its residents but our local businesses which the town relies on.</p> <p>Increased traffic will overly burden the residential roads which already are used as parking slots for the many drivers and business workers who refuse to pay the price to park in the car parks and on busy days with tourists as overflow parking areas! This already causes hazardous blind spots, danger to pedestrians and congestion on the residential and our narrow town roads and junctions as people disregard the dos and don'ts of parking and driving in towns.</p> <p>The stalls will bring further reductions in areas for parking and driving obstructions causing further chaos and further increasing both residents and local shop keepers anger and sadly possible accidents.</p> <p>FYI as a matter of reference : Having lived in the Honiton area before moving to Sidmouth, I can assure you that street trading brings down a town rather than enhancing what it offers! There appears not to be any control of what is allowed.</p> <p>Honiton street trading brings tac and low quality stalls and has had a major detrimental impact on the character of the town ( just see the empty shops ), causes massive reduction in parking ability. I always avoided Honiton town when the street trading was present which seems to be in most days now! I instead drove to alternative towns to shop and in last couple of years just avoided the town completely.</p> <p>Street traders / stalls take business away from local shops ( defeating the purpose of trying to attract increased income into a town).</p> <p>Local businesses pay high rates, employ people and support our local community. Licences should not be given to traders who are selling goods that can be obtained in a local town shop.</p> <p>Flexibility to permit outside traders to trade during short limited special events weekends and folk week is acceptable in a contained area of the esplanade only but NOT for any further extended periods.</p> <p>The increased litter and congestion it would bring would be detrimental. Not to mention the fact that we have only one operating public toilet ( totally insufficient for the current footfall) as the others are apparently out of order!!</p> <p>Our roads within Sidmouth do not provide the correct infrastructure for street trading.</p> <p>This is yet another poorly thought through idea from someone who clearly does not live in Sidmouth and has a lack of understanding and care of our town.</p>	<p><i>Sidmouth Objection 66</i></p>	
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101	GF2	Lifting of prohibited streets in Sidmouth	<p>I have had trouble sending my email to you.  I am AGAINST having a Street Trader on Fortfield Terrace in Sidmouth for a number of reasons:</p> <ul style="list-style-type: none"> <li>- Parking for permanent residents (with parking permits) is difficult enough as it is. A Street Trader would attract yet further cars wishing to park on the Terrace while eating their snacks;</li> <li>- The Gulls would be more evident than currently as they hoped for leftovers;</li> <li>- There would be more (accidental) litter dropped on the Terrace than there is now.</li> </ul> <p>We are MOST fortunate in Sidmouth to have a number of attractive restaurants and cafes in the town, besides a number of hotels. There is already a Trader at the entrance of Kennaway House which is convenient for people visiting Kennaway House, walking by, waiting for a bus, etc.  I hope this email arrives safely! Thank you!</p>	<p>Response Noted  No change to policy is proposed.</p> <p><i>Sidmouth Objection 67</i></p>	No
102 page 53	DL1	Lifting of prohibited streets in Sidmouth	<p>I am writing to strongly object to the council's intention of potentially allowing street trading in and around Sidmouth. I firmly believe this policy has been ill-thought through and leaves local brick and mortar businesses at a very high risk.</p> <p>As I'm sure you're aware, Sidmouth is a very seasonal town. Therefore, shops in the high street must rely on this summer trade in order to survive the winter - of which, I am one such business.</p> <p>I have four businesses in Sidmouth, each paying rates to the council, rent to landlords (nearly £80, 000 a year), buying produce from local suppliers, farmers and wholesalers and employing local staff (in excess of 50 this year). This helps keep the local economy flourishing. If a burger van or ice cream van were simply able to park up on the seafront, it would decimate my trade meaning I could ill afford rates and would be required to make my staff redundant. This would, naturally, have a knock on effect down the supply chain leading to yet more unemployment and misery at a time when the cost of living crisis is starting to bite. I'm quite sure the council wouldn't want to be blamed for actively pursuing a policy which will ensure local businesses will go under, simply in order to make a bit of extra money from the processing of street trading license applications.</p> <p>Sidmouth is already a very competitive environment with its charm, character and thriving high street keeping it firmly as the jewel in East Devon's crown - it would be such a shame that this council ruins that both for local residents,</p>	<p>Response Noted  No change to policy is proposed.</p> <p><i>Sidmouth Objection 68</i></p>	No

			<p>tourists and the district's economy as a whole. I look forward to seeing common sense prevail and for this policy to be scrapped. Thank you for your time.</p>		
103	LB1	Lifting of prohibited streets in Sidmouth	<p>Sidmouth's unique selling point is that it doesn't have the very things you are trying to attract - street traders cluttering up the streets and especially on the beaches. Please maintain the status quo where some trading is allowed (to be reasonable) but not in around another 30 streets of the Town. I object to this suggestion.</p>	<p>Response Noted No change to policy is proposed.  <i>Sidmouth Objection 69</i></p>	No
104	RE2	Lifting of prohibited streets in Sidmouth	<p>I write in a personal capacity to express my strong opposition to the proposal to create Consent Streets in Sidmouth. I would like to start with my deep concerns with regard to the following Press Statement which was issued by EDDC Comms Team on February 16: The newest proposed changed to the district's street trading policy looks to: Allow Sidmouth Esplanade to become a 'consent street' – allowing traders, with EDDC's permission, to sell products between May and September. It is currently restricted to one week during Sidmouth Folk Festival. The introduction of administrative fees – a new consent or renewal application, as well as a block consent application (such as a mini food festival) will be £45 and it would be £25 to make a variation. All approved applications will need to meet the new up-to-date policy – meeting current economic, safety and social requirements. For example only selling items that are not offered or directly competing with permanent services and businesses in the nearby area. Leaving aside the mangled English – what on earth does 'The newest proposed changed' mean? What other 'proposed changes' preceded the 'newest'? The first paragraph states that the proposed changes to 'consent street' will only apply to Sidmouth Esplanade. This is completely untrue, as in fact the proposal is to change the status of 32 roads and streets throughout the town ( your website page indicates 33 streets, but you mention Vicarage Road twice ). Furthermore you indicate that the Esplanade is proposed to be a summer consent street, which is true, but all the other streets, apart from the Beach, are proposed to be all year. This means that the paragraph is doubly misleading.</p>	<p>Response Noted  Timing and methodology of the consultation is detailed in the report to the Licensing &amp; Enforcement Committee.  See response No13 - determination of Street Trading Consents is by EDDC Licensing Team as the Regulatory Authority.  No change to policy is proposed  <i>Sidmouth Objection 70</i></p>	No

On seeing such a terribly misleading statement, I immediately rang EDDC at around 9.30am on Feb 16 and asked to speak to the Comms Team. Despite being a *Comms Team*, none of the seven members were available, and at the time of writing, on Feb 20, I have not received a call or e-mail from the Comms Team. The post is still prominent on the EDDC website.

In my opinion, the press statement is so misleading as to justify questioning the validity of the consultation. I note with interest that someone posting on Sidmouth Community Facebook ( who I do not know and have not contacted ) made exactly the same point.

What makes it even more unforgivable, is that the Press Statement/Information Post comes at a critical time for the Consultation, ten days before the deadline for a response. Tellingly, the East Devon Facebook page on Jan 28 posted a perfectly satisfactory presentation of the consultation. This means that someone from the Comms Team appears to have altered the presentation of the Consultation: it is hard not to suspect that it was not done deliberately. Their refusal to take down the post is extremely disappointing and I regard it as suspicious.

The misleading and factually incorrect wording is compounded and underlined by the addition of a photograph of Sidmouth Esplanade, Thus far, no explanation or apology for the error has been sent, and I do not expect to now receive one. I repeat it is still on the EDDC website, and has been there for four days.

No communication with the Licensing Team on the subject is possible because during the Consultation, they are refusing to accept telephone calls *on any matter* concerning the Consultation.

I can find no explanation for this attitude. I quite understand that *formal responses* to the Consultation should be made by e-mail or post, although that is itself unusual. But to ban all telephone calls on any matter related to the Consultation is unprecedented. This extraordinary procedure is currently being considered by the Interim Monitoring Officer.

It may be that the Comms Team are also embargoed from discussing any aspect of their handling of the Consultation, and this may explain their refusal to take telephone calls.

I have previously indicated in correspondence with the Interim Monitoring Officer that I have been dealing with EDDC on a regular basis for 45 years, across all departments, and I have never previously experienced a refusal to take telephone calls in this way.

Another issue that concerns me is the validity and structure of the Consultation

process. Specifically, I am interested to know who has been contacted by EDDC and invited to take part in the Consultation. I have asked this question repeatedly, but I have not had a reply.

As a resident of Salcombe Road, I can confirm that I have not received any communication from EDDC by post or leaflet, concerning the proposed change of status of my street, or informing me of the Consultation. This failure to notify is compounded by the highly misleading EDDC press release/information post on the official website, which does not name my street even though it is identified as being suitable for stalls, burger vans, ice cream salesmen, and marketing companies. And claims that only Sidmouth Esplanade is affected. My understanding is that individuals from *outside the East Devon District* have been contacted and invited to submit their views to the Consultation. I am advised that these may be individuals who will profit directly from the changes. I hope I am wrong but the silence from EDDC is deafening.

The Licensing Team Manager has quite recently publicly stated that Sidmouth's prohibited streets would not be changed to consent streets against the wishes of Sidmouth Town Council and/or Sidmouth Chamber of Commerce. I confess to being slightly surprised that the Chamber was being granted this 'veto' ( I was at the meeting ), but was reassured that he was being honest and meant it.

So it was disappointing that he has changed his mind. That, of course, is his prerogative. But I confess to being disappointed that he did not contact the Chamber to inform them and to explain his volte face.

This has been a shabby, disreputable, bungled Consultation, and in my opinion, it is sufficiently discredited as to be invalid. I think it will always be seen as such, and I think any unwelcome changes based upon it will be hugely resented in Sidmouth.

Turning now to the issues that the 'shamsultation' has considered, I have a number of reasons for objecting to all the proposals made for Sidmouth:

1. Democracy.

I think it is always wise to think very carefully before implementing changes against the wishes of a community. We know from the results to the Consultation conducted in 2016, that Sidmouth was strongly opposed to consent streets. EDDC may well decide to go against the wishes of Sidmouth as expressed at that time. They may use the 'shamsultation' as a justification in some way. However, I can only strongly advise against that arrogant approach. A Consultation should be properly conducted in an unbiased, fair and legal way. Responses should at least be respected if not

always adhered to.

2. Cost.

I suspect that members of the Licensing Committee may be under the impression that changing Sidmouth to consent streets will mean increased income. Indeed, it will, because the £45 fee is required from applicants whether they win or lose. The problem for EDDC is that the cost of administering the applications greatly exceeds that income.

We know this for a number of reasons:

- A. When consent streets were first introduced, the fee was £35 per application. However, such was the local anger ( most residents across the district voted against consent streets ) at the new regime that EDDC had to drop charges altogether. Meanwhile, in order to deal with the increased workload, the Licensing Team had to recruit two new members of staff, at a rough cost of £75,000 per annum.
- B. The consent system is highly bureaucratic, requiring mountains of paperwork, photography, phone calls ( if they are prepared to take them... ). Far more applications are made than previously and the workload is significant, *not just for officers but also for members*. Inevitably, the amount of paper involved and the complexity of the process makes lots of mistakes inevitable. These have to be dealt with and costs are involved.
- C. Decisions are often controversial, and the local press has been littered with examples in recent years. These controversies are again costly, involving the Comms Team, Licensing officers and members. Sidmouth in those last six years has been almost serene by comparison, and the only ( relatively mild ) controversies have been when *the Events and Licensing Teams have acted improperly*. Which, to their credit they have always admitted.
- D. We know that the Events Team was created in order to bring revenue to EDDC. We were told this at public meetings, and it was, from memory, its only justification. We were told that profits from their activities would be reinvested in public open space. In reality, the Events Team hired out public open space at a loss so residents and visitors alike were deprived access to places where they have never been previously excluded, and were paying for the privilege. Since its creation, it seem that the Events Team has been losing money, and quite significantly. The accounts are submerged within the Streetscene budget, but I am told that revenue is currently of the order

of £40,000 per annum. This seems to be confirmed by the recent Forward Plan where it is stated the Events Team hopes to raise revenue to £60,000 per annum.

The problem is that the Events Team apparently employs three full time staff, so wages alone are far from covered by income. There are many other costs incurred, so it is reasonable to assume that the Events Team currently loses at least £60,000 per annum, but probably much more, perhaps £100,000 per annum or even more.

E. The issue of value for money is always foggy at EDDC because staff costs, including pensions, etc., are rarely if ever taken into account. So, on paper, licensing and events may appear to break even, when they are actually costing an awful lot.

F. There will be considerable costs involved in supervising the street traders, and some of these, such as Environment Health, are a statutory responsibility. Other costs will be incurred by Streetscene in dealing with litter and pollution.

G. Unauthorized street trading is a problem in consent streets, because they can simply set up and trade without necessarily being identified as illegitimate. In consent streets this is rarely if ever a problem because any trader is obviously illegal. I anticipate that this will be a problem and inevitably dealing with it will be a cost. Illegal traders, of course, have an even bigger advantage over established premises, as their profit margin is even greater, and they are involved in less paperwork.

Licensing is of course a statutory responsibility, so some costs are inevitably incurred, but it seems certain that the change to consent streets has greatly increased the cost. I imagine that the Licensing Team is now four, maybe six, times the size it was in the days of John Tippin. And you could always get him on the phone!

With EDDC currently experiencing numerous vacancies, it seems perverse to use staff in these areas where losses are certain to be made.

The desperation of the Events Team to raise revenue has led to problems: choosing unsuitable, controversial and unpopular sites that are entirely unsuited to commercial activity.

3. Impact Upon Existing Businesses.

The impact upon local businesses in Sidmouth is bound to be significant, especially if Licensing/Events Teams become ever more keen to raise revenue. They are certain to place their financial interest above the community of Sidmouth. It is clear that street traders will target the busy

summer months, weekends and bank holidays. Most of the street traders will be from outside Sidmouth, and many will be from outside the District altogether. Our local businesses, operating from fixed premises, and therefore subject to challenging trading conditions and rising costs, are not in a position to be subject to this clearly unfair competition.

These costs are year-round, and Sidmouth depends heavily upon our shops and service providers to offer twelve month availability. Our town centre is already shrinking and opening hours are being reduced, because it is not viable to open. A number of shops are presently closed for business. Churn rate is clearly high. Local businesses are severely stretched and cannot have their peak time summer profits creamed off by transient traders from well away, who not be reinvesting in our town.

All this is happening at a time when parking charges have been doubled. Unfortunately, the fall in usage of our car parks was misreported to Cabinet on Nov 30 2022, as a result of an arithmetical calculation. Cabinet has indicated that it will persist with the doubled charges, perhaps as a result. The fall in usage between 2021 and 2022 was much higher than reported to Cabinet, a huge 31% in our seaside towns. In fact, the fall was really quite a lot more as neighbouring districts saw modest increases in usage, and we can reasonably assume that East Devon would have seen the same. It was of course, a glorious summer.

With the 'staycation' phenomenon abating, and the economy in a poor state, prospects for local businesses are not good. Into this unfavourable set of circumstances, the consent streets and the introduction of potentially large scale street trading to the detriment of our established businesses is a frighteningly uncomfortable prospect.

4. Litter and Pollution.

The prospect of greatly increased litter and pollution in our town centre area is a cause for concern. These are sensitive areas, not least the Beach, the Promenade and Esplanade, but also our Conservation Areas and Listed Buildings. Litter from the burger vans and ice cream salesmen in particular is likely to be prodigious: there is precious little enforcement, as we know. At the moment much of the litter in Sidmouth, especially on the Beach, is collected voluntarily by our estimable Plastic Warriors, but how long will they keep it up, and how much more litter are they prepared to deal with? Our bins on the seafront are presently often over-flowing, and will not be able to take a further large increase of waste. The beach is just not suitable for the bins that will be required. More litter breeds more litter: the prospects for Sidmouth in

this respect are appalling.

The threat of pollution is also concerning. I have personal experience of this when a burger van, without our permission, parked one Carnival Night on our land outside our shop in the High Street. The amount of cooking fat, litter and waste was enormous, and required a huge clean up for us the following morning. They traded very well on our land, without paying us in any way, and leaving a major health hazard on our doorstep, without any permission and on a public thoroughfare.

Our streets are already in a bad state despite the admirable efforts of our solitary street cleaner. Weeds abound. I myself volunteer to sweep and clean Salcombe Road, where I live. I will not be doing so after it becomes a consent street

Cooking oils and general waste are a real concern on our Beach. There will be no prosecutions for littering. Or improper waste disposal.

Only Exeter has more listed buildings than Sidmouth in the whole of Devon. We have some fine architecture in Sidmouth, and our fine Regency and 'Picturesque' buildings will be disfigured by the burger vans, ice cream salesmen, pop-up bars and second hand clothing stalls that EDDC so desires.

5. Sidmouth's Reputation and Heritage.

The decline of Sidmouth as an unspoiled and successful South Coast resort is upsetting for me as Sidmouth born and a lifetime resident. Our town once enjoyed a wonderful reputation as an upmarket destination resort. The loss of so many of our hotels, and the obvious distress of our town centre has damaged us without a doubt, although many organizations, and our Town Council, the Sid Vale Association and Sidmouth in Bloom in particular, do a great deal to support. It is heart-breaking to see these efforts so undermined by these proposals. Sidmouth has developed an image of quality and cleanliness that is increasingly under threat, by excessive signage, too much litter, and now the prospects of uncontrolled street trading.

The new consent streets are almost all in our celebrated Conservation Area, full of listed buildings, and other fine individual properties. We have by-laws intended to protect these areas from inappropriate development. It is completely wrong that EDDC intends to place burger vans outside these buildings, which include many that are listed Grade I and Grade II\*, and disfiguring the beautiful settings of our seafront. Ironically, your photo of stalls on our once-pristine Promenade says it all, as many have commented.

6. Suitability.

Sidmouth has a compact town centre with narrow streets and narrow pavements. Although visitor numbers have declined substantially as a result of the doubling of parking charges, the town can often be congested and the streets crowded. *Unfortunately those crowded streets will coincide with the arrival of the street traders under this new regime.* At the very time when our streets are thronged with shoppers, and the town is attractive and busy, the town centre will be submitted to stalls and vans, that will discourage trade for our established premises. And block our roads and pavements.

The idea that a burger van will attract tourists to Sidmouth, or to book a hotel room, is just preposterous. So there will be no extra trade to be shared between the 'incomers' and the established local businesses occupying fixed premises.

Sidmouth is renowned for its architecture, and for its welcoming feel. But it is more than that: we have a *reputation and image*, carefully built up over decades, and underlined by the recent excellent new Visit Sidmouth website. It is sad to see all that work spoiled and abandoned, as we double parking charges and invite street trading throughout our town and especially on our lovely Beach and famous Esplanade. It is worth noting that there is, and has always been, very little commercial activity on the Esplanade: this is not an accident. It is a policy pursued throughout Sidmouth's heyday. That heritage is increasingly under threat by EDDC's proposals to take Sidmouth downmarket, proposals which will only line the pockets of street traders from outside the District. All the money will go out of the town. Once a seaside town is taken downmarket it is very difficult and expensive to revive it. All this to make EDDC money, and it won't!

7. Legality.

I am not clear that it is legal to trade in the way proposed on the Esplanade or on the public highway. Nor for that matter on the Beach. The Beach, in part, is owned by the Crown. And the Esplanade is a public footpath, which cannot legally be obstructed.

I raised the issue last year of blocking a public footpath with the Events/Licensing Team when an illegal operation was installed at their behest. I never received a reply, despite repeated requests. This may have just been the usual refusal to reply to e-mails and telephone calls, but it more probably reflects that my concerns were justified.

Leaving aside concerns over the suitability of our narrow streets, I find it hard to imagine that owners of these locations, especially the County Council, will endanger drivers and pedestrians. Many sections of our pavements are

privately owned, including by my family. Is the Licensing Team aware of the complication that this represents? And what happens in locations where there is no registered title, as is very common in Sidmouth, with its historic centre?

8. EDDC in Sole Control.

No-one in Sidmouth is going to enjoy the prospect of EDDC operating the consent street system and having sole control. For reasons that many of us have forgotten, or cannot understand, perhaps lost in the mists of time, there is a long-running feud between the authority and Sidmouth. Many of us have tried many times to end the hostility but it persists. The relationship is strained, let's leave it at that.

The idea of decision-taking with regard to consent streets being solely in the hands of EDDC, understandably causes concern for Sidmouth's residents, given this longstanding sour relationship. This has been underlined by the organization of this very misleading 'Shamsultation'. Trust, bluntly has disappeared. It has to be re-won, and it may take time: it has not been improved by this car-crash Consultation.

With relocation to Honiton, EDDC's links to Sidmouth have become diminished. There is very little local knowledge of the town within EDDC, and the choice of 'consent streets' emphasises this. It is clear that the Licensing Team are not familiar with Sidmouth: they don't even know the names of the streets. At present, Sidmouth controls street trading in our town, and we want to keep it that way, where we have the benefit of local knowledge.

Any promises of 'consultation' will not be accepted by local residents, as in recent months assurances given by the Licensing and Events Teams have on several occasions been renegeed upon. Any little confidence we had, if any, has once again disappeared.

9. We have Room for Street Traders Already.

It was my suggestion that The Ham should be designated a Consent Street, made in 2016. This has worked extremely well, and has had the crucial advantage of giving Sidmouth Town Council, as owners of The Ham, a 'veto'. This is a large area of open space close to the town centre and adjoining our major car parks. It is highly suitable for events and has supported many. It is well resourced to take temporary food outlets, and again it does so effectively. Likewise Kennaway House, Blackmore Gardens, the Rugby Club and the Cricket Club. Sidmouth is blessed with a number of sizeable green areas within its town centre. And they are well used.

There are numerous other private spaces that are potentially available. Other towns often do not have these spaces in quite the same way, at the

heart of their communities.  
 It seems quite daft to me that EDDC are seeking to place these traders in highly unsuitable locations that will impede and endanger pedestrians and drivers, and infuriate everyone. And, I repeat, all to make a thumping loss on your licensing and events activities. When we have so many suitable locations already.  
 I have not mentioned the new and potentially exciting Amphitheatre, which used to host the Folk Festival Arena. This has been in existence for eighteen months, but has yet to be used.  
 The current system, based upon Prohibited Streets, is working very well. A few minor controversies, where EDDC have acted improperly/illegally, apart. It is simple, costs nothing to run, and suits Sidmouth very well. In particular it protects our Beach and Esplanade, and it is appropriate for our congested town centre of narrow streets. It is clear that it is working well. Why would we replace it with a very costly, unsuitable and controversial alternative?  
 Options  
 Frankly, I am reluctant to open a Pandora's Box by suggesting any kind of compromise.  
 However, I did suggest The Ham as a consent street and it has worked well. The Turning Circle is the roundabout at the eastern end of Sidmouth's Esplanade. I have assessed traffic using the Esplanade and heading east. 80% of traffic turns left into Ham Lane. Only 20% use the Turning Circle. It is therefore feasible to remove all traffic from the Turning Circle, except for access for, for example, the Inshore Rescue. It is therefore possible to imagine the Turning Circle being made into a Consent Street. And combining it with The Ham.  
 The closure of the Turning Circle has been proposed as part of Devon County Council's Traffic Plan for Sidmouth, Part 2, and has been discussed by DCC, STC and the Chamber of Commerce. Provisionally it seem likely that closure could be agreed. This might combine well with the proposed redevelopment of the Drill Hall by Rockfish.  
 The closure of the Turning Circle could lead to ownership being transferred from DCC to STC, giving STC a 'veto' over any 'consent' use. STC ownership of the Turning Circle would be an *essential* component of any plan to create a consent street in this location. And it makes sense to merge ownership with The Ham.  
 Another option is to declare the new amphitheatre at the Knowle a consent

			<p>area or 'street'. Since STC are expected to take over ownership after very protracted negotiations, this would give Sidmouthians the security of an effective 'veto'. And take decision-making out of the hands of EDDC. It has also been suggested that the current Folk Festival exemption for one week, could be extended for a single day to coincide the visit from the Red Arrows. I think there would be little opposition to this, if it were to be sensibly restricted.</p> <p>Finally, some people have considered the possibility of a high quality market taking place in, appropriately, the Market Square. This would require a road closure, and would be problematic. There are always issues with access to private residents in the area. The Market Square is small and the number of stalls would be limited. There will be congestion. It is possible to envisage a market once or twice a year. However, it would seem to be far more sensible to operate such an event from a more suitable location such as Kennaway House or The Ham.</p> <p>I do hope that we can avoid further discord and controversy by rejecting these proposals.</p>		
10 page 64	HL1	Lifting of prohibited streets in Sidmouth	<p>My son, and fellow director, has asked that I too, send an email stating my strong objection to EDDC allowing potential street traders to trade in Sidmouth.</p> <p>As I'm sure you're aware, Sidmouth is a very seasonal town. Therefore, shops in the high street must rely on this summer trade in order to survive the winter - of which, we are one such business.</p> <p>We have four businesses in Sidmouth, each paying rates to the council, rent to landlords (nearly £80, 000 a year), buying produce from local suppliers, farmers and wholesalers and employing local staff (in excess of 50 this year). This helps keep the local economy flourishing. If a burger van or ice cream van were simply able to park up on the seafront, it would decimate my trade meaning I could ill afford rates and would be required to make my staff redundant. This would, naturally, have a knock on effect down the supply chain leading to yet more unemployment and misery at a time when the cost of living crisis is starting to bite. I'm quite sure the council wouldn't want to be blamed for actively pursuing a policy which will ensure local businesses will go under, simply in order to make a bit of extra money from the processing of street trading license applications.</p> <p>Sidmouth is already a very competitive environment with its charm, character</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 71</i></p>	No

			<p>and thriving high street keeping it firmly as the jewel in East Devon's crown - it would be such a shame that this council ruins that both for local residents, tourists and the district's economy as a whole.</p> <p>I look forward to seeing common sense prevail and for this policy to be scrapped.</p> <p>Thank you for your time.</p>		
106	MKM1	Lifting of prohibited streets in Sidmouth	<p>We think that street trading on Sidmouth Esplanade and neighbouring central streets should not be allowed on more than one day a week. The same day in all locations.</p>	<p>Response Noted No change to policy is proposed.</p> <p>1 day a week trading – not an outright objection</p>	No
107	PNT1	Lifting of prohibited streets in Sidmouth	<p>I've just been made aware that there is some intention of increasing the roads in which traders can sell street food is in Sidmouth.</p> <p>We live in a conservation area in Coburg road and strongly object to your proposals of this road and all the other roads /esplanade etc . we hear you intend to let the traders trade .</p> <p>Please keep us informed and reconsider this to include local traders and residents views .</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 72</i></p>	No
108	JW1	Lifting of prohibited streets in Sidmouth	<p>We would like to object to the street trading consultation of allowing street trading within the Sidmouth town centre.</p> <ol style="list-style-type: none"> <li>1. It is very unfair competition of businesses like our 3 businesses who pay rates and trade within the town all year round, who contribute to the local community and invest in many organisations and sports teams.</li> <li>2. We are already trading in a period of intense unprecedented challenges. Many of the stalls, vans and trailers will be coming from outside the area, and will only appear at peak times in the summer and the money will drain out of the valley and make no contribution to the local economy</li> <li>3. Street trading greatly increases litter and pollution, leaving us as local businesses to clean up the mess</li> <li>4. Our road system, our listed buildings, our Conservation Areas, Esplanade and Beach, are simply not suitable on busy days to facilitate street trading as well as the footfall of visitors to the town centre.</li> </ol>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 73</i></p>	No

109	MJ1	Lifting of prohibited streets in Sidmouth	<p>I have just become aware of the proposal to increase the number of streets in the town of Sidmouth to "Consent Street" status. I find this totally unacceptable and cannot imagine what target market this is aimed at.</p> <p>It gives such traders unfair advantage over our established traders who pay high rent and rates.</p> <p>It will increase the costs of cleaning in the town as fast food outlets greatly increase litter and late night "vans" the "after pub closes" clientele that can lead not just to litter but to noise in residential areas and vandalism.</p> <p>Additional trade of this nature will devalue to charm for which Sidmouth is renowned. It MUST adversely affect the price of rooms in hotels along the seafront and devalue the properties. I believe it will also discourage more mature people from staying AND visiting and it is those visitors that bring money into the town itself.</p> <p>It seems that your press release does not mention your intention to have stalls, vehicles and traders on the beach in the summer months...again: why are you trying to make Sidmouth into the sort of holiday destination that it is not? Why don't you look to develop the resources that it has and that have clearly proved over the years to be what appeal to the visitors, hotel guests and have made it a desirable place to live?</p> <p>Stalls and stands along the Prom have caused problems with access for wheelchair users and pedestrians. I believe this is acceptable for the one week of Folk Festival, as people can make alternative arrangements for such a short time, but to suggest that this could be a "summer long option" deprives both visitors and residents alike of the peaceful enjoyment of the town that they love.</p>	<p>Response Noted No change to policy is proposed.</p> <p><i>Sidmouth Objection 74</i></p>	No
110	BD1	General	Great idea - I fully support the proposal.	<p>Response Noted No change to policy is proposed.</p> <p>General support of proposed policy</p>	No
111	ML1	Lifting of prohibited streets in	<p>I email you to raise my objection to the proposed Street Trading policy.</p> <p>The council allows street trading during Folk Week along the Esplanade. This is more than enough.</p>	<p>Response Noted No change to policy is proposed.</p>	No

		Sidmouth	<p>Traders selling their wares around the town can only hurt the main Traders in the Town who are there 24/7 and give a good honest service, pay rent rates and add something to the community. this will deplete their trade and is not what the town wants or needs. This idea may help fill a hole in your budget but it will not enhance the town and possibly deter visitors.</p> <p>I think you will find most of the locals are appalled that the Council are considering this idea. As a local who was born and have lived here all my life I really am.</p> <p>I hope you will listen to the views of the townspeople on this matter and not kill the golden goose that helps fund your council</p>	<i>Sidmouth Objection 75</i>	
112	LB2	Lifting of prohibited streets in Sidmouth	<p>Firstly, I would like to put in a Freedom of Information request about how much this consultation exercise is costing. Obviously, councils are now under close scrutiny by the media and the public how they use their funds. Sorry to say but this has the optics of unnecessary and profligate expenditure in these times and would be better spent on adult social care care, etc. But please tell me if I'm wrong!!</p> <p>Secondly, as a resident of one of the streets - Peak Hill Road - you might be surprised at some of the issues you encounter. For example, I pay myself to hire people to clean and clear the drains on Peak Hill because they get blocked up with leaves leading to water cascading in to the town. I also can sometimes be seen with marigolds myself clearing them This is just leaves. If you start getting anything else going into the drains - and it is inevitable you will with street trading on the street - then the town is in risk of flooding, as is my house. And no, sorry, I'm not going to carry on clearing the drains after street traders at my own expense!!</p> <p>The Victorian drainage infrastructure of Sidmouth has to be taken into account in this. And we all still remember the 'fatberg' ...</p>	<p>A Freedom of Information Request has been recorded for a separate response.</p> <p>Response to this Consultation Noted</p> <p>No change to policy is proposed.</p> <p><i>Sidmouth Objection 76</i></p>	No
113	GT1	Lifting of prohibited streets in Sidmouth	<p>I am against this for all streets. During the folk festival the promenade is ruined by all the rubbish that is there for sale. Rather than uplifting the town it is making it very cheap and tawdry.</p> <p>I have lived in Sidmouth since 1985 and have watched the town disintegrate into a town full of charity shops with unkempt dirty streets. Nothing looks</p>	<p>Response Noted</p> <p>No change to policy is proposed.</p>	No

			cherished and street trading would exacerbate this beyond repair. How about planting trees along the promenade with upmarket paving on the ground, something you would see in almost every seaside destination in Europe. Make it beautiful instead of destroying it.	<i>Sidmouth Objection 77</i>	
114	JB1	Lifting of prohibited streets in Sidmouth	I am writing to register my objection to the plans for extending street trading in Sidmouth. Not only will this severely impact on existing small businesses it will completely change the ambiance and style of the town in a negative way. There is also the impact on the natural environment with increased litter and over-crowding and the increased risk of plastic and toxic waste entering the sea and the River Sid.	Response Noted No change to policy is proposed.  <i>Sidmouth Objection 78</i>	No
115	MD2	Lifting of prohibited streets in Sidmouth	As a resident of Sidmouth I am very much against increasing our street trading from what currently exists. As a Council you have a duty to leave Sidmouth as it is, which is what makes Sidmouth so special. You also have a duty to the business owners to ensure unfair trading is not taking place.	Response Noted No change to policy is proposed.  <i>Sidmouth Objection 79</i>	No
116	SG1	Lifting of prohibited streets in Sidmouth	I thought I would just mention that Fortfield Terrace pavement is privately owned and belongs to the residents of the Terrace, I think there will be little appetite for street traders and would have to have agreement of all the residents.	Response Noted No change to policy is proposed.  General informative comment. As part of the ST application process land owner permission has to be sought before application is processed.	No
117	EC1	Lifting of prohibited streets in Sidmouth	I wish to oppose East Devon District Council's proposal to turn almost all Sidmouth's roads to 'Consent Street Status'. This will cause chaos in the town and bring the traffic to a standstill. It will be unfair to Sidmouth's local businesses some of whom are struggling in the present climate of high electricity bills, rates, etc. I agree with all the points listed by Sidmouth's Chamber of Commerce that this proposal should not go ahead	Response Noted No change to policy is proposed  <i>Sidmouth Objection 80</i>	No

118	JB2	Lifting of prohibited streets in Sidmouth	<p>I do NOT approve of the plan to turn Prohibited Roads in Sidmouth, as listed on page 20 of the draft proposal, into Consent Streets.</p> <p>Not enough thought has been made to the impact of these plans on local ambience, noise, traffic, litter, residents, local businesses, congestion.</p> <p>"Sidmouth - Devon's hidden gem?"</p> <p>You must be mad! Who is behind this?</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 81</i></p>	No
page 69	MC3	Lifting of prohibited streets in Sidmouth	<p>I am writing with regard to the Street Trading Policy Consultation 2023, specifically to object strongly to the proposal to re-designate many of the streets in Sidmouth to consent streets.</p> <p>The majority of Sidmouth recognise that the charm of Sidmouth is that it is unique, and doesn't necessarily move with the heard. The tourism industry, on which Sidmouth heavily relies, also appreciate that point and patronise Sidmouth in preference to other seaside destinations specifically for that reason. Anything that compromises the exceptional attractiveness of Sidmouth, such as this, should be rejected outright.</p> <p>Allowing burger vans and other mobile vendors to populate the streets of Sidmouth, will severely detract from the appeal that Sidmouth has, and they will offer nothing back to the town whatsoever. In fact the regular traders, who support Sidmouth all year round and pay taxes for the privilege, would be at a distinct disadvantage, whilst trying to compete with traders in vans, who only have a fraction of their overheads, but would be permitted to "pop up" almost anywhere, and just at the optimum times to cream off what they can.</p> <p>Apart from the mobile street traders, the only party to benefit from this action, will be EDDC, albeit for a fairly small amount of income, and maybe some level of job justification.</p> <p>At present, there is a fair balance of mobile traders, accessing Sidmouth via places such as Kennaway House, and the Esplanade during Folk Week. I don't believe that anyone has requested that this balance be upended.</p> <p>Another concern would be that permission for allowing traders to pitch up, would be at the sole discretion of EDDC. This is quite unethical, as the party giving consent would not have any particular stake holding in the operation, would not be negatively impacted at all by over use, and in fact only stand to</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 82</i></p>	No

			<p>gain funds for each and every application accepted. The incentive is there for abuse.</p> <p>I don't believe Sidmouth is at all suitable for this kind of trading and the inevitable increase in littering, known to be associated to this type of street trader, is a real concern.</p> <p>I believe these are quite generally held opinions within the town. No traders or members of the public have asked for this, only those with a vested interest, and mainly from outside of the town. The concerns are significant and it is very difficult to see anything but a detrimental effect whatever the increase, were this allowed to proceed. I believe other towns that have had this forced upon them are also experiencing many of these damaging and irreversible impacts that this causes.</p> <p>I look forward to some sense being brought to bear on this matter.</p>		
120 page 70	ATM1	Lifting of prohibited streets in Sidmouth	<p>I have just read your proposal to open numerous streets in Sidmouth to traders.</p> <p>Just to inform you, I am totally opposed to the idea for the following reasons. Many local traders have been really struggling to keep afloat over the past few years, especially catering establishments. There are already many food establishments competing for business and those available have a wide range of products with prices variable enough to suit most pockets.</p> <p>Sidmouth streets can be difficult enough to negotiate without the encumbrance of street traders vehicles causing an extra hazard to traffic on some of these narrow roads.</p> <p>Sidmouth traders can be held to account for litter in the area, littering would be virtually impossible to police where street traders are concerned.</p> <p>Sidmouth has built its reputation on being a clean and tidy safe seaside town which keeps its vibrancy throughout the year. Why change it? It would be very easy to "shoot the goose that laid the golden egg" it could easily inadvertently be turned into yet another seaside town.</p> <p>Why would anyone want to alter Sidmouth, it is a gem the way it is.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 83</i></p>	No
121	ND1	Lifting of prohibited streets in	<p>I'm wholly against this projected scheme on many grounds. i.e.</p> <p>With so many shops variously empty or on the market in Sidmouth, it surely hasn't escaped the notice of EDDC Councillors that the town is under</p>	<p>Response Noted No change to policy is proposed</p>	No

		Sidmouth	<p>severe financial strain.</p> <p>By spreading the available trade even thinner, I'm sure the Chamber of Commerce will be objecting very strongly. As an Ex trader of this town I would be very, very angry at this, which will doubtless not include a Rate reduction for the shopkeeper, which are already extortionate.</p> <p>Will there be in improvement in the Toilet facilities on the esplanade especially for these new itinerant traders and fresh water supplies provided. Will their waste rubbish be collected be the council free of charge. I would remind you that town shopkeepers/businesses PAY a private company to collect their waste rubbish.</p> <p>Whilst prepared to accept that this could improve over time, damaging the financial stability by allowing this type of change to the towns business structure will only reduce that stability in the future, which totally fails the original objective.</p> <p>To allow this would ruin the picturesque visual impact which many look for when contemplating a holiday destination, this is evidenced by the many photographs and paintings of Sidmouth Esplanade seen in so many publications, including the Town Councils "visit Sidmouth" publication. Which shop proprietor in their right mind would pay to advertise in that publication, with a picture, looking like a market layout, instead of an inviting view of one of Britain's visual resorts of choice.</p> <p>What will be happening to the benches (privately purchased) fitted in that area. Hoteliers will no longer be able to advertise some "Sea view Room", without risking complaints.</p> <p>With an enormous amount of finance laid out over the years, to protect our picturesque resource. Council seems open to spoiling the whole thing, in order to stick a plaster on an open wound.</p> <p>I am 100% AGAINST THIS SCHEME!</p>	<p><i>Sidmouth Objection 84</i></p> <p>Duplicate sent on 24/02/23 – respondent informed as received.</p>	
123	AC1	Lifting of prohibited streets in Sidmouth	<p>I wish to comment on the New Street Trading Policy for Sidmouth 2023: Sidmouth's reputation relies on its ABSENCE of whelk stalls, Kiss Me Quick hat kiosks and candy floss sellers. Sidmouth's reputation is as a refined, civilised seaside town . In Keith Owen's words 'England as it used to be'. In today's marketing parlance, therein lies Sidmouth's Unique Selling Point. Unless EDDC really wants to turn Sidmouth into Clacton-on-Sea or Blackpool PLEASE do not allow street trading.</p> <p>Secondly, a sure way to undercut our independent (and currently hard-</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 85</i></p>	No

			<p>pressed) shopkeepers whose hard work and dedication provides the attraction for many of our visitors ... is to allow street traders who pay no rates and no energy overheads. If you allow street trading that is very quickly all you will have left. Sidmouth will be a ghost town.</p> <p>Thirdly an increase in street trading will inevitably increase litter and clean-up requirements - again which will have to be paid for by RATE PAYERS and not by the traders causing it!</p> <p>We have absolutely nothing to gain and everything to lose by pursuing this perverse idea. I can only think whoever dreamt up this harebrained scheme is <i>deliberately</i> setting out to destroy everything that makes Sidmouth so beautiful. DO NOT DO IT!</p>		
124	PR1	Lifting of prohibited streets in Sidmouth	<p>I am writing with regard to the Draft New Street Trading Policy in relation to Sidmouth, where I live.</p> <p>Having read the draft policy I wish to object to every aspect of what is proposed for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The narrow streets of Sidmouth are part of its charm. However anything that adds to the existing congestion would be unacceptable to me</li> <li>2. The character of the shopping area is very attractive because of the many small independents. It is difficult to imagine they will prosper if there is street trading as well</li> <li>3. Many of the streets selected could become impassable if street trading were permitted.</li> </ol>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 86</i></p>	No
125	BS1	Lifting of prohibited streets in Sidmouth	<p>I wish to strongly object to the draft new street trading policy proposed by East Devon District Council as I believe that should this be approved it would totally change the character of the town and must not be allowed to be implemented.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 87</i></p>	No
126	MB1	Lifting of prohibited streets in Sidmouth	<p>I strongly object to the licensing of street trading other than the existing allocation during Folk Week. As it is, our local businesses are already finding it more than difficult to survive without introducing further indiscriminate competition.</p> <p>Please think again and reconsider the situation</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 88</i></p>	No

127	JH1	Lifting of prohibited streets in Sidmouth	<p>In response to the proposed changes to the Street Trading regulations in Sidmouth I would like to lodge my strong disagreement to these plans. As a resident in Sidmouth I am happy to have the Street Traders here on the Seafront during Folk week, indeed it enhances the Festival. However I feel that most of the visitors who come here enjoy Sidmouth as it is and makes it special from other more brash resorts..The lovely views along the seafront would not be enhanced by Street Traders regularly on the Promenade. I feel that our High Street needs more people shopping to support local shopkeepers rather than incomers with Stalls.</p> <p>The Streets listed as streets for which consent could be given are mainly residential and such traders would cause huge obstacles on the pavements which are already often far too narrow or non-existent.</p> <p>Therefore I strongly object to these changes and hope the council will not approve these proposed changes.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 89</i></p>	No
128	AT2	Lifting of prohibited streets in Sidmouth	<p>I am strongly against any of additional street trading that is being proposed. I think the extra trading which occurs during the Folk Festival along the seafront lowers the reputation of the town anyways as a special place to visit. However I can see some small benefits during that time.</p> <p>With all the current talk of traders struggling nationally and seeing some of the town's shop closing - or less busy than usual for the winter months, with an influx of street traders how many shops will we lose because of this suggestion ? We can now see vacancies for both M &amp; Co. and Joules sites - just how long will they be empty?</p> <p>I am sure residents can find most of their shopping requirements locally or online. I watched shops close in Glastonbury over the years due to the increase in street trading. Don't let that happen to Sidmouth and it will only lower the tone of the town to a cheap, gimmicky seaside town.</p> <p>Is the idea to raise additional money for EDDC or the benefit of residents? However I have no connection to any of the commercial businesses in town .</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 90</i></p>	No
129	JA1	Lifting of prohibited streets in Sidmouth	<p>I am totally against the proposed street trading. It is in keeping during Folk Week, but if this should be allowed to happen throughout the Summer, I think it will be a bad decision for Sidmouth. The local shops and restaurants will not survive. They are all having difficulty, and we should support them as best we can in the current situation.</p> <p>Do we really want to change Sidmouth that much? Those that live here say</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 91</i></p>	No

			how fortunate we are to live in such a beautiful place. Let's not spoil it now.		
130	GS1	Lifting of prohibited streets in Sidmouth	<p>I am completely against the ridiculous "idea " of turning the beautiful streets of Sidmouth into a street vendors delight .</p> <p>Sidmouth as you know is an historic town with amazing regency buildings and the local businesses work hard to try an earn a living in difficult circumstances to keep the place looking as good as it does . By encouraging outsiders to come in and literally take profits out of the town in this way would be a backward step and a kick in the teeth for many businesses. The streets mentioned are too narrow anyway which would be a health and safety nightmare. Please we don't want this to happen and may you cancel any plans and put a lid on them</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 92</i></p>	No
131	NH1	Lifting of prohibited streets in Sidmouth	<p>Is it April 1st. , are you serious about this ?</p> <p>This can only be described as a disgrace , what you are proposing will harm every business and trader in every town in East Devon, and spoil what is a beautiful area.</p> <p>My concern mainly as a resident is Sidmouth. Have you even looked at the streets you are proposing , I'm guessing not.</p> <p>The businesses are struggling to keep themselves busy and viable with all the increasing costs and staffing problems. The town and businesses have always been marketed, quite rightly, as a quality town with a beautiful Esplanade. It used to be marketed as "Select Sidmouth" for a reason , EDDC seem set on changing that .</p> <p>The one week where street trading has been permitted is during the Folk Festival. Most local people and businesses to my knowledge do not like the street trading but tolerate it for the one week. It is so called controlled by EDDC , a shambles is the only way it can be described . Absolutely no control of standard of traders ,parking on roads blocking the flow of traffic for most of the day. I would like to think our councillors will contact every business in their ward to find out what they really think of this.</p> <p>AGAIN -what are you and the councillors thinking. I appeal to the councillors to get a grip of things here, not bring something new that is not wanted or needed. Please protect what we have got and look after it properly, including the traders.</p> <p>What is to be gained from this proposal other than spoiling a beautiful , quality area</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 93</i></p>	No

132	MC4	Lifting of prohibited streets in Sidmouth	<p>I have just seen the proposed review and the list of roads in Sidmouth that are proposed to become consent streets.</p> <p>It seems somewhat bizarre that you consider many of these busy roads, often lacking footpaths, or purely residential to become consent streets. The hazards and risk of accidents must surely preclude their use, and the potential benefits would seem to be minimal if they exist at all.</p> <p>Please reconsider this list and publish your rationale for any future proposal in detail before any decision is made.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 94</i></p>	No
133	TC1	Lifting of prohibited streets in Sidmouth	<p>I understand there are proposals to allow street trading at sites within Sidmouth, and wish to object most strongly to this idea.</p> <p>In an economic climate where local shops are struggling to make ends meet, allowing numerous traders with few overheads to compete directly against them will quite literally be the final blow for many. Fair competition is one thing, this proposal has no "fairness" in it's offering for our beloved High Street.</p> <p>Sidmouth's unique appeal is in it's traditional nature, a nature which does not encompass the sale of tawdry goods at every turn and hotdog stalls on each corner. A move to include street traders will undoubtedly shift the town "down market", a policy that has already finished off innumerable seaside towns. A more likely approach to improve the lot of Sidmouth would be to encourage high class restauraners to the area, creating a foodie haven in the same manner that Ludlow has done so successfully in Shropshire.</p> <p>Please do not allow this idea to progress, it will be the death knell of this delightful town.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 95</i></p>	No
134	FC1	Lifting of prohibited streets in Sidmouth	<p>Having read the Street Trading Policy 2023, I wish to register my objection to it. I believe that allowing street trading on residential streets will be detrimental to the town a) in affecting our current local shops and eateries, b) in affecting the feeling of safety in our residential areas and c) in affecting the amount of litter that will be caused.</p> <p>We have a beautiful town with good footfall and visitors. Street Trading is just not needed or welcomed.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 96</i></p>	No
135	SH2	Lifting of prohibited streets in	<p>I am in <b>PERSONAL DETAILS REMOVED</b>. I am well travelled. I think street vending is fine as it is. I don't think you should be putting them on additional streets. Already at Kennaway House they have problems with extensive power</p>	<p>Response Noted No change to policy is proposed</p>	No

		Sidmouth	leads all over the place, albeit the events are lovely and well attended when they occur. Further, litter and unfairness on shops paying high rates will not be good either. The last thing we want is a dead town. Parking is also an issue at best. The traffic coming down Heydons Lane for parking at the Rugby club is a lot during folk week, so Coburg Road trading would definitely not be safe. I hope this point of view will be accepted	<i>Sidmouth Objection 97</i>	
136	DJG1	Lifting of prohibited streets in Sidmouth	Sirs, we wish to vote against the street trading proposed in Sidmouth in the strongest possible terms. It is fine during Folk Week but at other times it will take trade away from the shops in the town and will take away the gentle profile of Sidmouth where visitors come for a quiet walk around the town, a look in the shops and food in the cafes and restaurants. The parking in Connaught Road where we live is a problem as some of the houses do not have parking spaces or drives to park their cars on. already non residents of the road sometimes take up the only free parking as it is. there is also a big existing problem with GULLS which steal food from people walking along, sitting quietly on the esplanade and eating in outside food venues. more food opportunities would make more opportunities for gulls to attack please do not grant the proposal.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 98</i>	No
137	MB2	General	A wonderful idea, Exmouth would benefit from street stalls.	Response Noted No change to policy is proposed  General support	No
138	MW3	Lifting of prohibited streets in Sidmouth	I just wanted to say I am completely against the street trading. It is completely unfair to all small businesses in Sidmouth, shops, hotels , cafes and restaurants. These businesses have been through hell and back over the last few years, and this year it will be even harder to keep a small business running. Letting street trading happen all over Sidmouth will kill so many businesses. These businesses run all year round and keep so many people employed. These street traders will pop up take the business of other shops and go again. This is not what Sidmouth needs.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 99</i>	No
139	JP2	Lifting of	I would like to submit some comments on the proposal:	Response Noted	No

		prohibited streets in Sidmouth	<p>- I have noted that is proposed to extend the number of roads that could be subject to consent orders for trading. I would submit that these are primarily residential roads and therefore inappropriate for allowing trading. Peak hill road in particular is far too narrow</p> <p>- although a local market twice a week might be nice in either of the two car parks, the Ham or market square, it is inappropriate and unfair to local shops for this to be extended to allow extensive pop up stores from out of town traders for several months of the year. Without support from visitors during the peak Easter and Summer periods, many of our local shops will not survive and Sidmouth will become just charity shops and coffee shops. We need our independent stores. The significant senior population on fixed incomes do not provide enough support for these shops to be sustainable.</p>	<p>No change to policy is proposed</p> <p><i>Sidmouth Objection 100</i></p>	
140	IP1	Lifting of prohibited streets in Sidmouth	<p>I have read your draft policy proposal and I note your request for our views. I am a Sidmouth resident and am unequivocally against these proposals. My reasons are many fold. I shall watch the outcome of the consultation with interest</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 101</i></p>	No
147	GO1	Lifting of prohibited streets in Sidmouth	<p>I refer to the draft EDDC Street Trading Policy and wish to object to the proposed change of designation from Prohibited Streets to Consent Streets in Sidmouth.</p> <p>The policy makes no mention nor gives any rationale behind making this change, and the list of streets proposed for change appears to have been purposely hidden on the last page of the appendices. Given no reasons are given and no case for this change is presented in the policy, one can conclude there is no reasonable or compelling reason for it. Therefore the streets in Sidmouth that currently have street trading prohibited should retain this status.</p> <p>Furthermore Sidmouth has a good variety of organised retail shops and cafes each who require the influx of seasonal visitors to help them survive and this position should not be undermined by additional street trading activities diluting their turnover. The promenade area is already designated as a Consent Street (May - Sept) and this allows licensed trading activities to complement organised events at peak periods The promenade is also the correct location for these type of activities being exactly where the visitors are heading for. EDDC should be looking to protect traditional seaside locations such as</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 102</i></p>	No

			<p>Sidmouth and not be undermining the local traders by offering street trading pitches. Nor causing further disruption to local residents who will have to contend with stalls dotted around, along with the additional vehicles delivering the stalls, the stock and the vendors to run them not to mention the potential rubbish and littering that they may cause.</p> <p>I therefore object to this proposed change being included in the draft Street Trading Policy and wish to see it removed.</p>		
142	ILW1	Lifting of prohibited streets in Sidmouth	<p>We strongly object to the proposed extension of the streets where trading can be allowed in Sidmouth, particularly those which are bus routes or where the road and/or pavement is too narrow ie All Saints Road.</p> <p>We would also object to any street trading in areas where there are any existing shops or restaurants.</p> <p>We consider the promenade area sufficient for any pop up shops</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 103</i></p>	No
143	DN1	Lifting of prohibited streets in Sidmouth	<p>I wish to object to the proposal to allow street trading in numerous streets in Sidmouth.</p> <p>I am sure it will take the town “downmarket “, be detrimental to shops and tourism</p> <p>Please do not allow this detrimental step.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 104</i></p>	No
144	SP3	Lifting of prohibited streets in Sidmouth	<p>I am against the Proposal for Trading Consent Roads.</p> <p>Having read fully information around this proposal, the Sidmouth Chamber of Commerce reply to you, and as an SVA Member I fully endorse the views which include those of the Sidmouth Chamber of Commerce below.</p> <p>The Chamber feels that allowing a large number of burger vans, ice cream salesmen, stalls selling bric-a-brac and clothing throughout the town centre is likely to be a problem for a number of reasons:</p> <ol style="list-style-type: none"> <li>1. It is likely to be unfair competition for our established traders who pay rates, have to meet high environmental standards, and are part of our community. They provide a service throughout the year and are faced with unprecedented challenges. Many of the stalls, vans and trailers will be coming from outside the area, and will only appear at peak times in the summer to take our trade.</li> <li>2. Past experience has shown that street trading greatly increases litter and pollution: ironically it is often local businesses who have to clean up the mess outside their shops.</li> <li>3. Our road system, our listed buildings, our Conservation Areas, and our</li> </ol>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 105</i></p>	No

much-admired Esplanade and Beach, are simply not suitable.

4. Sole control of the 'consent street' system of licensing is vested in EDDC, so Sidmouth will have no say in what is allowed. EDDC is only offering 'consultation'.

5. The current system is flexible and working well, and there are plenty of suitable locations for 'street food' to be purveyed.

6. The 'Consent Street' system has been controversial in other East Devon towns. We seem to have few problems whereas other towns are frequently in the news as a result of issues arising from street trading.

The Chamber is unhappy with the current description of the Consultation process on the EDDC website. This implies that the only change in Sidmouth is to the Esplanade, where EDDC want to see street trading such as we have during Folk Week allowed throughout the summer. The EDDC press release does not mention that they also want stalls, vehicles and traders on the Beach in the summer, and in 30 other streets in and around Sidmouth town centre. For example, they wish to see street trading in Glen Road, Manor Road, Fortfield Terrace and Coburg Road, and in busy thoroughfares like All Saints Road, Vicarage Road, Sid Road, Salcombe Road, the High Street and Fore Street.

Surely, these roads are completely unsuitable and inappropriate for this type of trading.

The full list of streets proposed for Street Trading is as follows:

- All Saints Road
- Bedford Square and including the un-named street leading from Bedford Square to the Esplanade
- Blackmore View
- Chapel Road
- Chapel Street
- Church Street
- Coburg Road - between Coburg Terrace and Church Street
- Dove Lane - and the lane between Dove Lane & New Street
- Fore Street
- Fortfield Place
- Fortfield Terrace
- Glen Road, - south of Manor Road
- Ham Lane and East Street - from the Esplanade to Fore Street
- High Street
- King Street

			<p>Manor Road  Market Place  Mill Street, - west of its junction with Russell Street  Millford Road, - north of the ford  New Street  Old Fore Street  Peak Hill Road – east from its junction with Cotmaton Road.  Prospect Place  Radway, - south of the Post Office  Salcombe Road  Sid Road, - south of Redwood Road  Station Road - between Knowle Drive and The Esplanade  Streets adjoining the Three Cornered Plot (Known as The Triangle)  The Beach – from the mouth of the River Sid westwards to a point opposite Clifton Cottage.  The un-named street between Elizabeth Hotel and Marlborough Hotel (now Dukes)  Vicarage Road, - south of Connaught Road  York Street  Esplanade &amp; Promenade ( from May 1 to September 1 )  The Chamber is concerned that many residents in these locations are unaware of the impending change to the status of their road, and will not respond to the Consultation. Last time this issue was raised, the community of Sidmouth voted overwhelmingly against consent streets., and Sidmouth won the day.</p>		
145	RU1	Lifting of prohibited streets in Sidmouth	<p>Sidmouth is blessed with a marvellous variety of sole traders with a minimum of national chain stores; this makes it attractive to residents and visitors alike.</p> <p>However, allowing Street Traders, who will have much lower overheads, will result in the existing shop owners being undercut. This may reduce prices, but the inevitable result will be businesses closing down and empty premises (and reduction in income to E.D.D.C.). The streets will also become 'cluttered'. There can be no justification for a Policy which will certainly be detrimental, in many ways, to the town of Sidmouth.</p>	<p>Response Noted  No change to policy is proposed</p> <p><i>Sidmouth Objection 106</i></p>	No
146	SM1	Lifting of	Street Trading Consultation – Objection	Response Noted	No

	<p>prohibited streets in Sidmouth</p>	<p>Firstly, I have to declare an interest in this matter, as I am chair of <b>ORGANISATIONS NAME REMOVED</b> and I know as a <b>ORGANISATIONS NAME REMOVED</b> we are receiving many comments from members. However, I write to you today with my own business hat on, along with my husband, we have owned and have run <b>ORGANISATIONS NAME REMOVED</b> for the last 17 years <b>ORGANISATIONS NAME REMOVED</b> is a complex of 11 self catering cottages, which attracts over 350 families and couples each year to East Devon. I can honestly say that Folk Week is always the last week to fill, our guests avoid this week, as they simply do not like Sidmouth and the town in becomes during the festival, their main gripe is the awful looking stalls along the Esplanade selling tat, saying it simply spoils the beautiful esplanade. I can say I agree wholeheartedly with them, we also avoid going into Town that week. Speaking to Chamber members this is often their quietest week of the year too.</p> <p>So why do you wish to spoil The Esplanade which is Sidmouth's biggest asset? Over commercialism of the town would simply spoil it and then we have killed the goose that lays the golden egg. I recently visited Torquay and let's put it this way I will not be rushing back or recommending Torquay to our guests unless they wish to vape or get a tattoo done! Sidmouth is unique so let's not spoil it. This year on the Esplanade you could receive a free back massage from a company not based in Sidmouth. Why was this allowed? What value does this add?</p> <p>Our own business faces challenges from the surge in Air BnB properties in the area pre covid there was 300 and now 1200 are listed in this area alone, like the businesses in Sidmouth we all have fixed cost (business rates, waste collection etc) which simply the street trading people do not have or in our case second home owners. This provides an unfair advantage to the business owners in Sidmouth, who will not be able to undercut the prices of the Street trading people. The High Street is facing lots of difficulties at the moment and EDDC decision to increase car parking charges has not helped the businesses in town. Last season we received no ends of complaints regarding these car parking prices from our own guests, who were cutting down the number of places they visited because of these charges. We need to encourage people into the town not put them off visiting.</p> <p>I have seen in the past, vendors from a market stall in the Strand, Exmouth pouring oil directly down the drains, stuffing the waste bins full of commercial waste. Is this what we want for Sidmouth? There is no one from EDDC to regulate this unless you are going to have an inspector at each event.</p>	<p>No change to policy is proposed</p> <p><i>Sidmouth Objection 107</i></p>	
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			On behalf of my business and my guests, I would like to object to this proposal.		
147	EC2	Lifting of prohibited streets in Sidmouth	Re the proposal to permit street trading on the Sea Front at Sidmouth - in addition to Folk Week - I, as a resident of Sidmouth, are totally opposed to this proposal. It will alter to the entire character of what is at presently a reasonably tranquil experience at this location. There is ample opportunity in the town for trading.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 108</i>	No
148	PS1	Lifting of prohibited streets in Sidmouth	<p>I note the proposal of EDDC to change the designation of some currently prohibited streets and considerably extend the number of weeks in which street trading is permitted, in Sidmouth.</p> <p>I strongly object to both these proposals:</p> <ol style="list-style-type: none"> <li>1. Sidmouth is primarily a residential community - it is not yet a town with the majority of properties owned by "2nd homers". Whilst tourism is a major economic driver for the town, I can find no published economic data which demonstrates how the increase in street trading would actually benefit the town itself - either by way of increased footfall or perceived "tourism attractiveness".</li> <li>2. Whatever the Council's published intentions are to avoid a negative impact on existing 'permanent' businesses, it will be almost impossible to adequately regulate street traders to prevent them becoming a source of unfair competition to those businesses. At present, "Day Trippers" coming to Sidmouth - whether by car or coach - have the opportunity to spend their money in our excellent retailers, cafes and restaurants. If this disposable income is siphoned off by street traders, it is bound to affect detrimentally business-rates paying providers.</li> <li>3. Most street traders are 'hobby retailers', selling low quality, low priced goods - many of which are imported from the Far East. I can find no published assessment from EDDC of the impact on Street Scene and litter collection or Trading Standards services.</li> <li>4. The list of Sidmouth Streets currently being considered for becoming Consent Streets has to be a joke and to take just a handful of examples - All Saints Road is perpetually congested in the summer months, Coburg Road is an important but narrow one-way street, Fortfield Terrace is a very narrow residential and access street, Manor Road is an important coach access street for the Manor Road car park and as for designating Station Road between Knowle Drive and the Esplanade - a congested major access route with two "pinch points", well words fail me. Clearly, only a complete failure of</li> </ol>	Response Noted No change to policy is proposed  <i>Sidmouth Objection 109</i>	No

page 83			<p>comprehension or local knowledge by Officers could have led to such a street being considered.</p> <p>5. Having Street Traders on the Esplanade during Folk Week alone is a reasonable provision. Having them there for several months during the summer is most certainly not. It will detract from the overall appearance, create more rubbish, massively restrict the width of the walkway and considerably impact on the carefully preserved frontages.</p> <p>East Devon District Council is fast getting a local reputation for being greedy - massively ramping up the cost of car parking, closing some much used public toilets and imposing costs on others are all income generators likely to inhibit tourism. To attempt now to counter this by permitting a degradation of the environment by considerably extending the locations for, and time duration of, Street Trading - one can only assume for further income generation purposes - provides yet another instance of insensitivity to the needs of the local community. And we residents are the folk who pay the Council Taxes.</p> <p>As a former District Council Leader from another Authority, I am usually supportive of Local Government initiatives. However, this one is completely inappropriate and indefensible. Please do not proceed with this new Street Trading Policy.</p>		
149	MR1	Lifting of prohibited streets in Sidmouth	<p>I write on behalf of <b>ORGANISATIONS NAME REMOVED</b> who own both the <b>ORGANISATIONS NAME REMOVED</b> hotels in Sidmouth to object in the strongest possible terms to the proposal to grant the licences for stalls and street traders including mobile catering units from May to September</p> <p>We feel it is unfair competition for established traders in the town who pay rates ( our two hotels works out at a figure of around £215000 pa ) these businesses are part of our community, often family owned with a vested interest in Sidmouth and all that Sidmouth stands for which is an upmarket holiday destination.</p> <p>The last few years have been extremely challenging with the effects of Brexit and Covid .</p> <p>We acknowledge that there has been this type of trading in a restricted area around Kennaway house in a “ controlled “ environment and this seems to work well , allowing this type of trader to set up in any of the roads on the list we feel would bring increased litter and pollution together with impacting on the traffic infrastructure.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 110</i></p>	No

			<p>We are part of a seaside town that has listed buildings , conservation areas , a popular and much used Esplanade and to allow this type of trading would , in our opinion, detract from the esteem in which the town is held as a holiday destination which must be protected .</p> <p>We would urge you to reconsider the granting of these licences</p>		
150	MS1	Lifting of prohibited streets in Sidmouth	<p>Changing rules and laws in Sidmouth would be such a big mistake...our town is not to be ruined by changes like this....so many reasons not to go down this path,..Sidmouth would cease to be Sidmouth to a great degree and become more of a market town...</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 111</i></p>	No
151	ASB1	Lifting of prohibited streets in Sidmouth	<p>We object very strongly to the draft proposal for street trading in sidmouth. The present situation is good enough. I am sure our resident businesses must also be totally opposed. It is them that need eddc support.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 112</i></p>	No
152 page 84	JS4	Lifting of prohibited streets in Sidmouth	<p>I would like to object to the proposal to have market stalls along the Esplanade in Sidmouth other than at Folk Week on the grounds:</p> <ol style="list-style-type: none"> <li>1. Detrimental impact on Sidmouth traders many of whom are struggling to survive with many shops and cafes/restaurants closed or up for sale.</li> <li>2. Sidmouth Esplanade epitomises our lovely Regency town which is loved by residents and visitors who come to appreciate our historic links to the Regency period which would be spoilt by street traders along the Esplanade.</li> <li>3 The deck chairs that used to be for hire along the Esplanade did not survive so why will street traders move in.</li> <li>4 Street traders along the Esplanade for the summer months would turn the Esplanade into a "Flea Market" not he look our town deserves.</li> </ol> <p>Also to put stalls in car parks is also in my opinion a bad idea as it would take away valuable parking spaces when in summer they are at a premium. Plus they would have queuing being a health and safety hazard in a busy car park.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 113</i></p>	No
153	RT1	Lifting of prohibited streets in Sidmouth	<p>I have seen your proposals for changing the rules on Street Trading in Sidmouth.</p> <p>I am opposed to any change.</p> <p>The current prohibited streets are unsuitable for street trading and need to remain prohibited. Can you seriously support street trading on "Mill Street west</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 114</i></p>	No

			<p>of its junction with Russel St" (for example) - part of it hasn't any footpath, and the part that has is narrow?. Has anyone actually looked at these streets? I believe that street trading (including on the Esplanade) would change the whole character of Sidmouth and could affect the livelihood of the many independent shops we are lucky to have in Sidmouth and which serve Sidmouth year-long. There is very little street traders could offer that is not already available.</p> <p>It would also change the whole character of the town, a character which needs to be maintained as a unique tourist attraction.</p> <p>Part of the attraction of the Esplanade is its width, making it suitable for large numbers of visitors, including small children on scooters and push-toys. Street trading on here would narrow it and cause it to lose much of its functionality; and spoil the open aspect which attracts visitors to the town.</p>		
154	DE1	Lifting of prohibited streets in Sidmouth	<p>I'm writing to object to the proposals to allow increased street trading in Sidmouth for the following reasons: I run a cafe/bar in Sidmouth where I pay rent, rates, electricity, gas and waste collection and it is a struggle in the current climate to break even. When the Folk Festival is running, we accept that there are numerous street traders; we don't find that we have increased numbers, due to the vast number of street traders offering food, if this were to be the case for the summer season, then we will need to close our doors as this is totally unfair competition that we are unable to compete with. I understood that the local council was trying to regenerate the high street, but if this goes ahead, it will have the opposite affect. The summer season is the time that many small traders need to increase their take to see them over the winter, this will, in my opinion, go a long way to killing of the high street.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 115</i></p>	No
155	MC5	Lifting of prohibited streets in Sidmouth	<p>I, personally, having traded in Sidmouth for 32 years, do not want to see the extension of street trading beyond the one week during the Folk Festival. I think that it would be detrimental to the character, atmosphere and appearance of the town, would affect rate/rent paying established businesses, and the town and streets are too small/narrow, not to mention the potential extra traffic and litter and stress on the already local amenities.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 116</i></p>	No
156	BH2	Lifting of prohibited	<p>We feel obliged to respond to the street trading proposal. We have owned and run a hotel on Sidmouth seafront for more than 30 years</p>	<p>Response Noted No change to policy is</p>	No

		streets in Sidmouth	and we feel that this proposal is not only detrimental to us but all businesses in Sidmouth. Businesses in Sidmouth pay business rates all year every year. Will the street traders be subject to any type of business rates? We are a provider of accommodation, those who book to stay with us are seeking uninterrupted sea views not the back of tents. Tourism brings tremendous revenue to the town. Will the rubbish generated be adequately disposed of? The bins are always overflowing. Another issue is the unauthorised use of our toilets at our cost. Ultimately we feel it is not in keeping with the look and feel of a regency town like Sidmouth.	proposed <i>Sidmouth Objection 117</i>	
157	JM3	Lifting of prohibited streets in Sidmouth	I have major concerns about the plan to permit street trading, as outlined in your document. It will add nothing to the prosperity of the town. It will increase the amount of litter in the town, and it could potentially create problems of noise and/or antisocial behaviour for residents near to the areas concerned	Response Noted No change to policy is proposed <i>Sidmouth Objection 118</i>	No
158 page 86	JMW1	Lifting of prohibited streets in Sidmouth	May I point out that a number of the roads mentioned in the proposed plan are also roads on which residents and visitors park for limited periods to enable them to visit the shops in the area. Surely this will have an adverse effect on the shopkeepers who are already finding it hard enough to make a living and keep Sidmouth a place visitors wish to visit. To have stalls, and vehicles parked all day is totally inappropriate. The esplanade can only be the place for such activities and even then only during Folk Week.	Response Noted No change to policy is proposed <i>Sidmouth Objection 119</i>	No
159	SLMB1	Lifting of prohibited streets in Sidmouth	We totally object to any-more street trading. We feel this is unfair competition for us as sole traders paying rates. We already suffer with the constant buskers and beggars blocking passing trade from our windows and entrances to our shops. The streets in the town are already becoming very messy with rubbish. The shop keepers often have to clean the streets with the constant rubbish blowing around. Having more traders will only add to this problem.	Response Noted No change to policy is proposed <i>Sidmouth Objection 120</i>	No
160	JRH1	Lifting of prohibited streets in Sidmouth	We wish to comment on the Street Trading proposals. We very strongly object to the whole concept of this idea for, among others, the following reasons:- It is wholly unfair on those traders who have premises, employ staff and have business rates and many other overheads to have to pay. Especially as the stallholders may generally come in from outside and therefore take money out	Response Noted No change to policy is proposed <i>Sidmouth Objection 121</i>	No

			<p>of the town. This is particularly relevant as many shops everywhere are struggling in the present economic climate.</p> <p>Most of the roads listed are totally unsuitable to be further restricted by static trading vans or stalls.</p> <p>In the case of food vans, there is smell pollution, litter and noise with customers congregating around.</p> <p>The present arrangements regarding trading on the Esplanade during folk week, and occasional weekends on the Ham and Kenneway House do enhance the town and do not need to be extended in any way, particularly on the Esplanade.</p> <p>There seems no justification for even considering this idea of consent streets that will be of any benefit to the town.</p> <p>Unfortunately, this appears to be a scheme dreamt up by someone who has no experience or idea of running a business, but just an excuse for the local authority to raise yet more money by being able to issue and charge for licences without any idea of the damage this can cause.</p>		
16 page 87	ABDS1	Lifting of prohibited streets in Sidmouth	<p>Objection - Draft Street Trading Policy</p> <p>Having read through your new Draft Street Trading Policy document we are strongly of the opinion that it is a bad idea. Although it may be practical and useful in some East Devon towns, it certainly is not appropriate in Sidmouth. The streets you list as 'Prohibited Streets' should be kept as just that — with no opportunity for any consent to trade in those streets.</p> <p>Most of the streets listed fall within the town Conservation area — the very part of town which should be protected, and which by its character contributes to the important tourism industry here. So many of the narrow streets and pavements are thronged with pedestrians for much of the year, there is certainly no space to accommodate street stalls and traders. And how would it affect the current provision of street parking ?</p> <p>Also we object to the proposal that the Esplanade and Promenade consent for street trading be extended to the five summer months. <u>Please</u> keep it to Folk Week only. More and more people are using the sea front area, and summertime especially is always crowded there. Adding stalls and traders will result in it becoming really congested and unpleasant .</p> <p>We can see no logical reason to even consider these proposals in Sidmouth; it</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 122</i> Postage response</p>	No

			<p>will not benefit residents or visitors and would doubtless be detrimental to our own local shops and businesses. The reason given in the Draft, document, is that :</p> <p>"...This policy supports a street trading experience that is diverse, vibrant and adds to the social and cultural fabric of East Devon that maintains, protects and enhances our environment..."</p> <p>In fact it would do the very opposite, we believe it would erode the character and cultural fabric of our town — and all that make Sidmouth unique. Please do not proceed with this plan.</p>		
162	HS1	Lifting of prohibited streets in Sidmouth	<p>I thoroughly disagree with your proposals for street trading as the normal shop owner has laid out vast expenditure as rent etc only to have more competition from an excess of other traders . I think it's a very underhand way to gain extra monies and lose credibility from the people of sidmouth ,it will bring the tone of a regency town to that of a Blackpool level.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 123</i></p>	No
163 page 88	AD1	Lifting of prohibited streets in Sidmouth	<p>As a resident of Sidmouth I wish to register my position as being against the proposal that would allow Sidmouth Esplanade (or any other nearby street) to become a 'consent street' – allowing traders, with EDDC's permission, to sell products between May and September.</p> <p>The reasons for my objections are as follows:</p> <ul style="list-style-type: none"> <li>• It will take business from existing high street retailers increasing the risk of further shop closures</li> <li>• Street traders unload their vans and then often park on residential streets which in the case of Redwood Road (where I live) prevents lorries &amp; vans making deliveries to houses and potentially preventing fire-engines and ambulances getting to properties at the end of the road (because parking is staggered either side of the road with insufficient space for large vehicles to weave in-between)</li> <li>• The trading stalls will damage Sidmouth's image as an upmarket Regency Town</li> </ul>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 124</i></p>	No
164	JS5	Lifting of prohibited streets in	<p>As Sidmouth residents and a family we are very comfortable with the kind of street food and stalls that are currently offered from time to time at the Ham and Kennaway House. We think this is the right balance going forward.</p>	<p>Response Noted No change to policy is proposed</p>	No

		Sidmouth	<p>We feel that allowing a large number of burger vans, ice cream stands, stalls selling bric-a-brac and clothing throughout the town centre is likely to be a problem for a number of reasons:</p> <ol style="list-style-type: none"> <li>1. It is likely to be unfair competition for our established traders who pay rates, have to meet high environmental standards, and are part of our community. They provide a service throughout the year and are faced with unprecedented challenges. Many of the stalls, vans and trailers will be coming from outside the area, and will only appear at peak times in the summer to take our trade.</li> <li>2. Past experience has shown that street trading greatly increases litter and pollution: ironically it is often local businesses who have to clean up the mess outside their shops.</li> <li>3. Our road system, our listed buildings, our Conservation Areas, and our much-admired Esplanade and Beach, are simply not suitable.</li> <li>4. Sole control of the 'consent street' system of licensing is vested in EDDC, so Sidmouth will have no say in what is allowed. EDDC is only offering 'consultation'.</li> <li>5. The current system is flexible and working well, and there are plenty of suitable locations for 'street food' to be purveyed.</li> <li>6. The 'Consent Street' system has been controversial in other East Devon towns. We seem to have few problems whereas other towns are frequently in the news as a result of issues arising from street trading.</li> </ol> <p>I implore you to cease consultation into the changing of the rules. Leave the rules as they are or resubmit a much 'watered down' offering which is inkeeping with the local area and encourages public support.</p>	<i>Sidmouth Objection 125</i>	
165	DS2	Lifting of prohibited streets in Sidmouth	<p>I am astounded to learn that anyone should be considering licensing changes to allow such damage to happen .</p> <p>The very essence of the promenade in Sidmouth will be destroyed and there will be an instant fall in the town's attraction if it becomes overcrowded for much of the summer season.</p> <p>How do these extra visitors arrive ? And how much more rubbish ? Please no thank you.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 126</i></p>	No
166	PW2	Lifting of prohibited streets in Sidmouth	<p>I write as the Managing Director and owner of <b>ORGANISATIONS NAME REMOVED</b> to express my total opposition to the proposal to allow the Esplanade and 31 streets or roads to become consent streets in Sidmouth. The Esplanade and Beach is Sidmouth's shop window and it would seem that EDDC wishes to ruin this area to enrich their pockets which in turn will have a</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 127</i></p>	No

			<p>devastating effect upon the hospitality trade and businesses in Sidmouth. Our customers come to view the sea and not the back end of a tent which we are at present subjected to for one week of the year during the Folk Festival. It is my opinion that there are better places to have a designated area and in this respect consideration should be given to the Ham and perhaps Blackmore Gardens.</p> <p>Hopefully EDDC will realize for the second time that this proposal is unacceptable to the electorate and react accordingly. If not, I for one will place a planning application before you for the change of use of a prestigious four star hotel to revert back to its original use as a terrace of houses.</p>		
167	JN1	Lifting of prohibited streets in Sidmouth	I feel very strongly that, apart from folk week, street traders should not be allowed to operate in Sidmouth. We need, more than ever, to support our local shops and small businesses	Response Noted No change to policy is proposed <i>Sidmouth Objection 128</i>	No
168 page 90	AS1	Lifting of prohibited streets in Sidmouth	I am writing to express my strong opposition to the proposed extension of street trading licenses. The current licenses work well , offering plenty of opportunities for street traders but still preserving the conservation area, residents needs and traffic management. Any extension of these licenses would be completely unfair to established traders in the town and would undoubtedly eat into their profits (where they are lucky enough to make them) Please could you add my name to those who disagree with these proposals.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 129</i>	No
169	EN1	Lifting of prohibited streets in Sidmouth	Plese rstrict street trading to the existing level in Sidmouth	Response Noted No change to policy is proposed  <i>Sidmouth Objection 130</i>	No
170	DM1	Lifting of prohibited streets in Sidmouth	I wish to voice my concern regarding the proposal for consent streets in Sidmouth. As a member of the Chamber of Commerce I know the costs that the businesses in town have to suffer. The idea that traders can come in and set up for the day and literally lift the bread off our members' tables is not something to be recommended. The Esplanade in Folk week is understandable but even then, the quality of	Response Noted No change to policy is proposed  <i>Sidmouth Objection 131</i>	No

			those traders is sub-standard, in my opinion. By way of this email I would like to formally voice my objection to the proposal.		
171	MJP1	Lifting of prohibited streets in Sidmouth	<p>I wish to voice my horror and objection to the proposal for street trading to be introduced for the whole Summer Season.</p> <p>In Folk Week , which is a special week and an exception, the stalls on the Esplanade add to the bustle and atmosphere because they are only there for a week!</p> <p>These are my reasons for objecting.</p> <ol style="list-style-type: none"> <li>1. The town shops need the summer months trade. Street stalls will take their trade. Why not utilise the empty shops with short leases?</li> <li>2. Traffic in and around Sidmouth is already awful in the summer. Street stalls will make it even worse.</li> <li>3. Increase of litter. Bins are not emptied often enough as it is.</li> <li>4. The street stalls will make the town look like an extended jumble sale.</li> <li>5. It is not in keeping with the traditional values of families coming to Sidmouth to the beach for gimmick free family time.</li> <li>6. It will cost the ratepayers huge amounts to organise, police and clear up after and the town will gain nothing from it.</li> <li>7. Tacky , tatty stalls will attract crime and social unrest which will spill into the community.</li> <li>8. Why??? People can go to Exmouth or Paignton if they want amusement arcades and nasty cheap rubbish from stalls.</li> </ol>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 132</i></p>	No
172	DG1	Lifting of prohibited streets in Sidmouth	I am very much AGAINST the proposal for Street Trading in Sidmouth It is unfair for our local shops It will cause more congestion It will spoil the look of the Regency Town It will create more litter	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 133</i></p>	No
173	FS1	Lifting of prohibited streets in Sidmouth	<p>I wish to oppose most strongly the proposal to allow street trading to take place in Sidmouth.</p> <p>For a start it will adversely affect the shops and businesses in town who struggle enough as it is. There will inevitably be a big increase in littering. The streets in town are narrow and stalls will cause obstructions and blockages on the pavements. Much of what they sell will be low quality products, as is the case during Folk Week and the stalls along the front. They won't bring any</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 134</i></p>	No

			benefit to the town and residents whatsoever. We don't need a lot of temporary food outlets, or cheap market stalls selling to visitors, we need to support the shops and cafes we already have.		
174	MC6	Administer Fees	Thank you for the opportunity to reply to the consultation. Regarding the fee proposal for block trading consent, would there be any fee exemptions for certain organisations apply for block trading consent like voluntary organisations or community fund raising events?	Response Noted No change to policy is proposed	No
175	GP1	Lifting of prohibited streets in Sidmouth	As a Sidmouth resident I strongly oppose East Devon's District councils proposal to turn almost all of Sidmouth roads to Consent street status. Sidmouth is a beautiful town that would be spoilt by traders being allowed on the seafront all year round and on side roads	Response Noted No change to policy is proposed <i>Sidmouth Objection 135</i>	No
175	RJM1	Lifting of prohibited streets in Sidmouth	We are very much against the proposal to change street trading regulations	Response Noted No change to policy is proposed <i>Sidmouth Objection 136</i>	No
175	JS6	Lifting of prohibited streets in Sidmouth	I strongly object to the Street Trading Proposals put forward by EDDC. This is an ill conceived plan to increase street trading in Sidmouth, particularly with the number of streets that are being proposed to be used. The impact on the town traders would be detrimental, the increased rubbish and the obvious restriction of space on the esplanade particularly during the summer months. The town's Chamber already manage any street traders well with quality street stall and food traders at appropriate times of year. What EDDC are proposing are increased traders selling poor quality merchandise and 'tatt' covering the whole town which is not acceptable. Sidmouth is a regency town of exceptional beauty in a beautiful location, it does not need street traders in any form. Instead support the town's trading people and fill the shops and listen to the town's Chamber of Commerce, they understand the requirements of the town	Response Noted No change to policy is proposed  <i>Sidmouth Objection 137</i>	No
178	EC3	General	I think street trading is a good idea. Somehow it makes one feel we are more of a community.	General support noted.	No

179	JLR1	Lifting of prohibited streets in Sidmouth	We strongly oppose the idea of increasing the number of 'Consent Streets' in Sidmouth for all the reasons highlighted by the Chamber of Commerce. We fail to see what significant benefit would be achieved by this proposal when compared to all the negative aspects that no doubt would be experienced by residents, visitors and business owners alike	Response Noted No change to policy is proposed  <i>Sidmouth Objection 138</i>	No
180	AFB1	Lifting of prohibited streets in Sidmouth	I strongly oppose the plans for any additional street trading in the town. 1, it will take trade from the shops, who are struggling anyway. 2, the visitors who come into Sidmouth struggle to find adequate parking. So street trading will only add to the problem. 3, there are plenty of coffee cafes and food cafes for a town this size, we don't need mobile vans/stalls. 4, if you allow stalls along the esplanade on regular basis this will impact on the hotel trade. Visitors come to Sidmouth for the peace and tranquility Sidmouth offers. 5, the council should be focusing on the shopping experience Sidmouth offers, and supporting the shops not penalising them with such a ridiculous and absurd idea	Response Noted No change to policy is proposed  <i>Sidmouth Objection 139</i>	No
181	WG1	Lifting of prohibited streets in Sidmouth	I write to lodge my objection to your proposal to increase street trading in Sidmouth. I agree with the objection as eloquently outlined by Sidmouth Chamber of Commerce and the SVA. I am a permanent resident in Sidmouth. There us adequate street trading (food in particular) currently without a need for more	Response Noted No change to policy is proposed  <i>Sidmouth Objection 140</i>	No
182	CFB1	Lifting of prohibited streets in Sidmouth	I strongly object to all points on this policy 1 , We have so many empty shops , they rely on summer trade to carry them through the winter ,you should be supporting them ,not encouraging more competition. 2, Too little is done by the council. ,to encourage visitors to our town , those that do come ,choose the town as a peaceful relaxing town ,who will not wish to take their morning or late night stroll whilst stalls are setting up or packing away .Visitor's want the deck chairs back ,not food vans and market stalls . 3, Our Hotels are struggling too who wants to book a sea view which turns into a market view. 4, Timings 8.00am to 10.00pm madness !!!! 5,The other streets identified, would cause chaos with regards to traffic	Response Noted No change to policy is proposed  <i>Sidmouth Objection 141</i>	No

			management , have you never stood by the Tesco island !!!!! 6, There are already many sites within the town to facilitate “Pop up shops “ Kennaway House site ,The Ham site , The Triangle area ,The Methodist Hall ,The empty Market Hall needs to be redeveloped and the area in the front of the hall.		
183	LW1	Lifting of prohibited streets in Sidmouth	I wish to object to the proposal to open up street trading in Sidmouth for the following reasons: The allure of Sidmouth for many of its residents and tourists alike is that it does not have street trading as a norm, so people are not faced with tourist tat or smelly burger vans. Stalls during the Folk Festival or other special events or occasions are entirely a different matter and are generally welcomed. Most of the 40 streets listed are totally unsuitable - for example All Saints Road which is the main bus route for the town and is often congested with traffic, or Coburg Road which is far too narrow. The “resident” shops, cafes and pubs etc need trade all year and not to face competition from part time opportunistic traders just for the busiest times of year. The litter problems would be likely to increase significantly and much of the litter would not get sorted for recycling. Please do not go ahead with this crazy idea which could ruin a lovely town.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 142</i>	No
184	JW2	Lifting of prohibited streets in Sidmouth	We are completely against street trading in Sidmouth for the following reasons; 1- The shopkeepers pay rates all year round and are at the heart of our economy. 2- Parking is at a premium here and this will make matters worse. 3- With the number of visitors rising dramatically there is a possibility of covid numbers becoming a danger to elderly residents. 4-Will the number of stalls and vans be policed or will Sidmouth be gridlocked? 5-This is a nice town held in high regard and does not want to be turned into a massive car park with litter in the streets.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 143</i>	No
185	CS1	Lifting of prohibited streets in Sidmouth	It has only just come to my notice that there is a consultation on 'Consent Street Status' and I wish to advise that I am total against this proposal, I am more than happy to have Street Traders during folk week but to have this continue for four months will completely change the character of Sidmouth. Sidmouth is a town by the sea and not a seaside town and this is its charm.	Response Noted No change to policy is proposed	No

			<p>It is unimaginable to think what it would be like to have burger/ice cream vans/traders stalls in the streets listed in your consultation document - litter/pollution/traffic congestion. The Shops in Sidmouth are suffering already and this will make it even worse for them.</p> <p>I hope you will seriously consider this proposal and reject it whole heartedly.</p>	<i>Sidmouth Objection 144</i>	
186	GP2	Lifting of prohibited streets in Sidmouth	<p>Whilst reading this mad cap proposal I had to check the date as I thought that it was April 1st. Sidmouth in the past had Councillors who looked after the Town and agreed Bye Laws which over time has served the town well, and it is a pity that those in other sea side towns didn't bring in similar laws: these were to protect the town from out of place advertising and trading and making the Esplanade, Promenade and beach a Conservation Area as this is our shop window and any idea of either weakening, or indeed scrapping this, is nothing short of sacrilege and must not be allowed to proceed. Sidmouth hotels are still major employers in the town and bring in many visitors with spending power as can be seen in an International Survey which showed that Sidmouth was the 5th most popular resort in England and the status quo must be allowed to continue or else it will be yet another nail in the coffin of prosperity. Do those who propose to advance Consent Streets against the will of most people prefer 2nd rate resorts such as Torbay which has the added problems of drug taking, litter, anti social behaviour and crime which these proposals would introduce? It is difficult enough for shopkeepers as it is without them having to put up with cheap imitations of items which they sell. The very idea of most streets being made Consent Streets fills those sensible enough to think with dread and a very quick sinking to the bottom, where everyone should be thinking of the good of the town and not seeing what they can do to destroy it. Perhaps it is really a case of jealousy. This scheme must be rejected in its entirety.</p> <p>FURTHER COMMENTS ADDED ON 25/02:  Objection to new Street Trading.  To add to my previous comments I wish to also state that there should be no increase at all in Street Trading in any street or road, including those named by the Town Council, as the majority are in the town Conservation Area including the Esplanade and the turning Circle at Port Royal, as applications will then be made to close the turning circle as well. To allow trading along the Esplanade, which is our shop window, must not be allowed under any circumstances, as at times the queues are bad enough with delivery vehicles, let alone those</p>	<p>Response Noted  No change to policy is proposed</p> <p><i>Sidmouth Objection 145</i></p>	No

			vehicles parked for long parts of the day. This will also have a detrimental impact on the Hotels.		
187	ELH1	Lifting of prohibited streets in Sidmouth	<p>Having just read through the proposal mentioned above, we are appalled with it's content and suggestion that Sidmouth could potentially become a 'clone' of other seaside resorts. Sidmouth is unique as a resort. It sits between towns like Exmouth, a family amusement type of resort and the much quieter towns of Beer or Branscombe. Sidmouth is a small resort. But. It does have a large shopping area, with independent shops. This shopping area provides a place where people on holiday wander around, shopping and using the various cafes/restaurants. They fill the the town's 6/7 very large hotels. These shops have just survived the Covid period, are wrestling with Brexit problems and the present faltering economy.</p> <p>You are now suggesting that they compete with street traders etc who don't pay for premises and don't have to adhere to various other rules that provide customer protection or fairness.</p> <p>Now there is less customer spending money available, surely any spending must go into running the permanent local shops in our town to safeguard our local community environment. Street traders do not make communities, local shops do! We, Sidmouth, have a community. Elsewhere, out-of-town shopping outlets have destroyed local shopping areas, leaving us with the current national problem of local decaying town shopping areas.</p> <p>There is more at stake here for Sidmouth. We do not want to see our shops close, or the hotels sold for holiday homes, or the streets with possibly dubious selling. We both are against this proposal.</p>	Response Noted No change to policy is proposed <i>Sidmouth Objection 146</i>	No
188	IS1	Lifting of prohibited streets in Sidmouth	<p>I do not agree with your proposals to extend possible street trading in Sidmouth.</p> <p>The main point is that it will put further pressure on our local shops at a time when we are already losing some. There is unlikely to be any real benefit to residents from items sold by street traders and our streets are not wide enough for such trade.</p> <p>Traders on the Esplanade are an integral part of the Folk Festival however any extension here whilst not a space problem would undoubtedly detract from the quality image of the town.</p> <p>Proposed closure of public toilets and increases in parking charges will</p>	Response Noted No change to policy is proposed <i>Sidmouth Objection 147</i>	No

			discourage visitors. Tatty street trading will also not enhance the town at all.		
189	WD1	Lifting of prohibited streets in Sidmouth	I object strongly to any changes to the existing rules. Blackmore Gardens and the Ham are the only places suitable for trading, this includes Folk Week.	Response Noted No change to policy is proposed <i>Sidmouth Objection 148</i>	No
190	SG2	Lifting of prohibited streets in Sidmouth	I am writing to oppose the new plans for Street trading in Sidmouth. The idea is preposterous and Councillor Whibleys argument of the proposed street trading policy complimenting existing businesses in town is totally wrong. Ask any non hospitality business how the stalls on the Esplanade during Folk week affect them , not to mention those in Blackmore Gardens and Kennaway House, and many will say that it has a detrimental affect on their business. They might not be selling things that are available in town although many do but all they do is draw people away from the town centre to spend their money. £45 for a licence is nothing compared to the high rents, rates, utilities, insurance, rubbish clearance etc that the towns businesses pay and these people will give nothing back to the town. In addition some of the proposed streets to be allowed street traders is ridiculous : Fore Street / High Street - have you seen the width of the pavements, Dove Lane, Glen Road - it's a residential area. If this proposal goes ahead it will be another nail in the coffin for the towns businesses, following on from the car park charge increases and the town will eventually become a ghost town but may be that's what the EDDC want. The EDDC have never supported the businesses in Sidmouth and no doubt other towns in the area and it's about time that they did.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 149</i>	No
191	NKR1	Lifting of prohibited streets in Sidmouth	The idea of extending street trading to the narrow roads proposed is absolutely ridiculous You will ruin the quiet genteel character of Sidmouth. Sidmouth is a beautiful seaside town - it has not been over commercialised and it is this that draws a lot of visitors year on year - including ourselves. Devon should have be able to have the quieter seaside resorts as well as the more 'over commercialised' ones that draws I'm afraid, in many cases, too many visitors but appeals to some.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 150</i>	No

			<p>How you expect to get street traders in the narrow roads is beyond us. The sea front which is an absolute joy to walk along should also be left alone.</p> <p>Thank you for reading this - we love Sidmouth and have been very regular visitors- our next trip is in June. So please do not ruin the character and ambience of an absolutely wonderful seaside town that is a delight to visit</p>		
192	LA1	Lifting of prohibited streets in Sidmouth	<p>I would like to object to the street trading policy consultation with regards to increasing the number of trading stalls in Sidmouth.</p> <p>I opened a shop in Sidmouth last July and we amongst other traders are struggling to keep on top of overheads and continue trading with such poor trade currently in the town.</p> <p>I feel that adding more traders will only weaken the chances of the existing ones surviving the current trading climate and that Sidmouth will result in having many empty shops.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 151</i></p>	No
193	AW2	Lifting of prohibited streets in Sidmouth	<p>I strongly object to your proposal to turn many of Sidmouth's roads into Consent Street Status.</p> <p>Sidmouth has long been seen as the Jewel in the Crown of Devon and this is why we have visitors all year round. To turn it into a street market town would be unforgivable. We have lots of individual shops that attract visitors to the town. They work desperately hard to keep going throughout the year. To impose competitors who don't have to meet the same environmental standards, pay rates or pay employees all year would be grossly unfair. Our shops would lose turnover during the busy season that helps them survive the winter.</p> <p>To suggest more trading on the Esplanade and on our beautiful beach is almost criminal.</p> <p>Perhaps the EDDC would like to copy Blackpool and illuminate the town.</p> <p>I am disappointed that the EDDC should even think of such a programme.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 152</i></p>	No
194	LGP1	Lifting of prohibited streets in Sidmouth	<p>I would like to put forward my views against the proposal to change the street trading policy in Sidmouth – there is an enormous amount of pressure on the high street businesses right, more than there ever has been in living memory.</p> <p>The internet has already had an immense impact on all high street businesses, the full impact of which was exacerbated greatly by the pandemic. Following that we have the same vast cost increases as all households, and also a drop in spending and difficulty with staffing for many. In Sidmouth we have had the additional hit of the carparking prices doubling overnight last year which had an</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 153</i></p>	No

			<p>immediate negative response to daily business in the town. With all these challenges there has been and continues to be an enormous amount of businesses that have closed, scaled down, or currently are up for sale or in the process of being closed.</p> <p>The EDDC &amp; Sidmouth Councils need to think very carefully about what is best for Sidmouth town centre ... if you put in place yet another challenge to the high street businesses that are still striving to survive, especially one as potentially hard hitting as this could be for some, you may find that there is a very sad high looking high street before the year is out. Consider what happens out of season when all your street traders are nowhere to be seen and all the shops have been put out of business ... what will people come to Sidmouth for and where will your business rates come from then? We already have just about one of every charity shop in the town but it really can't take any more pressure. It is still is just about maintaining itself as a good town centre for shopping, imagine what it could be if the council supported it more thoughtfully, it could become a real shopping destination.</p> <p>Short-term strategies are what is going to kill this town centre and all the year-round businesses currently struggling to fight the battle to stay in business, before you know it you'll have casinos and pound-shops to go with your market traders and imagine what that will do to your house prices etc.</p> <p>Continue with this proposal at the peril of the Sidmouth as you know it. All that is good here is very precariously balanced right now.</p>		
195	JM4	Lifting of prohibited streets in Sidmouth	I wish to record my opposition to the proposed changes for the reasons stated in the Chamber of Commerce statement.	Response Noted No change to policy is proposed <i>Sidmouth Objection 154</i>	No
196	PH1	Lifting of prohibited streets in Sidmouth	I would not want to see any extension of permits in Sidmouth beyond what we have now (February 2023). The facilities, narrow streets etc are not suited to the style and amenities of a regency town, except for the Folk Week.	Response Noted No change to policy is proposed <i>Sidmouth Objection 155</i>	No
197	KSF1	Lifting of prohibited	We are writing to object to the proposed change in designation of some Sidmouth Streets from prohibited to consent status.	Response Noted No change to policy is	No

		streets in Sidmouth	We agree with the position outlined by the Sidmouth Chamber of Commerce. Our main reasons for objecting are: - the adverse impact on local rate-paying businesses - the litter and nuisance which will be caused. We are particularly concerned about the possibility of street traders on the beach.	proposed  <i>Sidmouth Objection 156</i>	
198	DH2	Lifting of prohibited streets in Sidmouth	In response to your consultation on extending street trading I would like to lodge my vote for keeping the situation as it currently is.	Response Noted No change to policy is proposed <i>Sidmouth Objection 157</i>	No
199	PS2	Lifting of prohibited streets in Sidmouth	As a long-term resident of Sidmouth I wish to strongly oppose any attempt to increase street trading in Sidmouth. Folk Week trading exceptions, particularly along the sea-front, are difficult enough for the mostly elderly population of Sidmouth, who already have a hard time negotiating the narrow pavements and uneven surfaces of the shopping streets and access roads and lanes without being confronted with traders as well. It would be a huge mistake and a massive public safety concern. It would be courting disaster! Please don't even consider it.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 158</i>	No
200	CH2	Lifting of prohibited streets in Sidmouth	I have heard that the council is thinking of allowing more street trading in Sidmouth. I completely object to this suggestion. It would be a terrible betrayal of those businesses that pay full council tax business rates etc. How could they compete with those who don't. It would be another nail in the coffin of those that have struggled through covid and now this difficult time. If the council wants to expand the retail offer in Sidmouth they should look to organise a farmers market once a month on The ham, as we no longer have a butcher. Using exclusively local producers	Response Noted No change to policy is proposed  <i>Sidmouth Objection 159</i>	No
201	LC2	Lifting of prohibited streets in Sidmouth	I totally object to allowing street stalls on 30 streets in Sidmouth. This will be completely detrimental to the last remaining shops in town. More shops will close and residents will be left with no town. Many of the roads will not cope, accidents will happen. The current licensing is perfect, please leave well enough alone. The best thing the council can do for the town and tourists is to support the	Response Noted No change to policy is proposed  <i>Sidmouth Objection 160</i>	No

			existing shops by reducing their current costs. Please please DO NOT ALLOW this madness to go ahead.		
202	KM2	Lifting of prohibited streets in Sidmouth	<p>myself and a lot of local residents of Sidmouth are concerned with the prospect of street trading in Sidmouth, I am Sidmouth born and bred.</p> <p>We are not a candy floss and kiss me quick hats type of town, anyone who visits Sidmouth does so because are unspoilt , unchanged and unique,</p> <p>Street trading will kill the local shops, who are struggling to make ends meet in this economic climate.</p> <p>The streets were named for trading are not only too narrow to be safe, but also take away vital parking spaces, it also will attract the wrong type of person. I would suggest using Exmouth town which is a kiss me quick town and has a very long and wide promenade.</p> <p>Is this being proposed by councillors who doesn't know Sidmouth , never had a site inspection of the streets mentioned, or just doesn't care.</p> <p>The locals are very proud of the fact that we are unchanged , and unspoilt that's the way we like it and chose to stay, work and live here.</p> <p>Perhaps the councillors involved would like to have Street traders outside their houses.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 161</i></p>	No
203	PR2	Lifting of prohibited streets in Sidmouth	<p>I object to the proposed changes to street trading rules in Sidmouth on the grounds that it would adversely effect the existing traders in Sidmouth by introducing commercial competitors that do not have the overhead costs of someone trading from fixed premises, would adversely effect the safe passage of pedestrians and vehicles on the footways and carriageways and would adversely effect the character of Sidmouth which in turn will have an adverse effect on attracting visitors and consequently reducing their spend in the existing traders.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 162</i></p>	No
204	BB1	Lifting of prohibited streets in Sidmouth	<p>This is a very bad idea indeed to have street trading throughout the year. It's alright at Folk Week as that just lasts for 7 days and it's quite sufficient.</p> <p>The Sidmouth shops need people to spend their money with them, they have high overheads with rates, rent, heating etc to pay for and don't need any more competition from various traders coming and going.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 163</i></p>	No

			<p>The streets and roads in Sidmouth are not wide enough to allow the setting up of stalls, roads would become blocked by the vans being unloaded and reloaded at the end of the day and there would be more litter around. People need to be able to walk safely on the narrow pavements without having to go onto the road. There are enough cases of people falling already without having lots more trip hazards.</p> <p>Also we don't want people wandering round while eating after buying food from stalls. We have a number of very good restaurants and cafes to cater for them.</p>		
205	BS2	Lifting of prohibited streets in Sidmouth	<p>After reading the news of the consultation regarding the street trading policy by EDDC, I wish to air my strong views against these changes.</p> <p>I am a resident in Sidmouth who enjoys the Folk Week for all the different street fayre it includes. I think allowing the extension of trading areas listed around the town will be a huge loss for our local traders who provide for us throughout the year. This will take a large chunk of their trade and profits.</p> <p>Allowing street trading along the promenade between 1st May till 1st September will also have the same outcome.</p> <p>Busy beach areas during the summer months already cause a problem with increased waste, bottles and bbq litter.</p> <p>Who is going to pay for the increased clean ups that will be required?</p> <p>Having trading units along the streets listed will also cause so much disruption for local residents, assuming traffic will be redirected or just left to cause traffic jams throughout the town.</p> <p>Along with these problems there will also be less obvious ones, anti social behaviour and crime will increase.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 164</i></p>	No
206	MBJ1	Lifting of prohibited streets in Sidmouth	<p>The draft new Street Trading Policy includes a proposal that 'Street Trading should be permitted on the Esplanade and Promenade from 1 May to 1 Sep annually'.</p> <p>My wife and I oppose this proposal for the following reasons:</p> <p>a. The dates are at the height of the holiday season, when the Town is at its busiest.</p> <p>b. As a result, the esplanade and promenade are often well filled with visitors and residents taking one of the most attractive strolls available in Devon. Street Trading during the Folk Festival indicates how very quickly the area becomes overcrowded, spoiling the enjoyment of the stroll.</p> <p>Furthermore, despite the best efforts of your refuse disposal teams (and they</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 165</i></p>	No

			<p>do an excellent job), loose litter inevitably accumulates.</p> <p>c. To extend this trading for the whole of the summer season would, in our opinion, lead to an over-crowded and litter prone seafront, causing considerable disappointment to residents and visitors alike.</p> <p>d. Additional refuse collection work would also add additional, unwelcome expenditure to your budget.</p> <p>Street Trading in this area is an acceptable attraction during the few days of the Folk Festival but not for all the summer season.</p>		
207	LB3	Lifting of prohibited streets in Sidmouth	<p>Reference the above, I tend to agree with trading taking place in other areas in the Town of Sidmouth. I am a regular visitor, with my husband and dog, to the Town and when there are street traders at certain times along the Explanade it makes it more interesting. As long as they do not compete regularly with the independent shops in the Town I think it would be an asset to the Town and people who live there. For example, it could give farmers the opportunity to sell their produce directly to a larger audience which is good for everyone. Also there are cheese producers who would add to the selection of choice. I must say the cheese shop in the Town has not always been that good on occasion when I have visited and I definitely had some cheese to bring home which was off and the assistant was rude to me so I never visit the shop now when on visits. I have also received a few none too welcome responses from other shop owners and perhaps it would do them good to have to compete with others who are allowed to sell their goods on occasion. I would not favour free entry to the Town all the time but certain days, say once a month have a big market all over and this would attract visitors and Town dwellers alike. This would not take too much trade away from others and in this day, we all have to allow others to trade to make a living. If you stay still, you will die. I have seen this in a town near me where the DC and Councillors have not used business acumen to sell the town and it has slowly died and once dead it is very difficult to resurrect. So, I would say, do not throw this out without careful consideration. I would move permanently to Sidmouth if I could get my husband to agree and we are coming regularly to the Town to look round the area as it would be our last move. I like the welcome given to dogs as well and love to watch people with their dogs walking up the Explanade.</p> <p>Best wishes to you all and your decision making. We shall be there in May/June for our big yearly holiday to have a bit of peace and have the</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 21</i></p>	No

			Jazz/RB Festival to enjoy in the middle of our stay. You see, we arrange our visits around busy times and a quieter period at the beginning and end of the holiday. The trading position could work the same with careful thinking put into it.		
208	SSC1	Lifting of prohibited streets in Sidmouth	<p>With regards to the article in the Sidmouth Herald regarding street traders in Sidmouth.</p> <p>We wish to make a formal objection to streets traders, selling hot food, especially.</p> <p>We are a small business and have been trading in Sidmouth for the last 21 years. In that time, we have had to except that the street traders around folk week take away most of our business, it's only for a few weeks so we factor that in.</p> <p>Anything above that is totally unacceptable. We have struggled over the pandemic and are struggling now with a decrease in business and dwindling staff issues.</p> <p>On top of all this, if they were to be more Street traders selling hot food, this would be completely unacceptable as our business and other businesses like ours would suffer immensely.</p> <p>If this were to go ahead, we would have to appeal against your decision. Businesses like ours need to be protected as we are valuable to the community. Even though we are struggling, We are expected to pay our council tax in full and plan to continue to do so. We should be protected against these Street traders, who threaten our business in a big way.</p> <p>Please keep us updated.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 166</i></p>	No
209	EF1	Lifting of prohibited streets in Sidmouth	I strongly oppose this. No thought given to traders in the town who pay rates etc.	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 167</i></p>	No
210	MD3	Lifting of prohibited streets in Sidmouth	I have had a shop in Sidmouth since 1987, during recent years retail has become increasingly difficult and these plans can only make things worse. To illustrate this my worse trading week in the summer is during folk week due to the abundance of traders arriving in town. If this trading continues throughout the summer it will probably be the death knell for my business and I am sure	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 168</i></p>	No

			<p>I'm not alone. I can't imagine that the income from these licences can be sufficient for the amount of damage done to the towns shops.</p>		
211	PM1	Lifting of prohibited streets in Sidmouth	<p>I write to give my opinion on the above consultation.</p> <p>I am against the proposal to change the status of the current prohibited list of streets in Sidmouth.</p> <p>I believe this will impact existing local services and also lead to increased rubbish and antisocial behaviour.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 169</i></p>	No
212	JC4	Lifting of prohibited streets in Sidmouth	<p>I would like to write to oppose the new EDDC draft street trading policy for a number of reasons shown below. As a local resident of Sidmouth I feel the current system that only has designated locations at set times of the year (Ham/Kennaway/Folk week trading locations) works well for the town.</p> <ul style="list-style-type: none"> <li>•The Esplanade is first and foremost a walkway – an inclusive space for everyone's needs (whether it's on foot/mobility scooter/prams), it's busy enough with people and those accessing the beach to include pop up stalls to hinder access and affect the general aesthetics of the town's landscape. The permission proposed 1st May – 1st Sept is at the busiest period for the town, in Folk week there are often vans parked along the road alongside – this creates hazards for drivers/pedestrians – but is manageable for 1 week not for 4 months.</li> <li>•Covid/cost of living crisis means our local businesses need local people more than ever to buy their goods/services and they provide local employment to sustain the town for the local people and are crucial to maintain our valuable tourist trade.</li> <li>•The nature of the town is made up of narrow pavements/roads – suggesting roads such as Mill St/Millford St/Coburg Road as potential trading location are totally unsuitable for congestion/ noise and pollution and I feel would have a negative impact on local residents accessing their own homes.</li> <li>•We already have local food/craft markets at Kennaway House during the day/evening that work well for the town + Sea Fest in the Spring/Connaught at Christmas.</li> <li>•We have limited parking options in the town, more trading will put pressure on</li> </ul>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 170</i></p>	No

			<p>local residential roads.</p> <ul style="list-style-type: none"> <li>•Litter provision – we already struggle in peak season with overflowing bins along the sea front, I see an increase in rubbish with ‘disposable cups etc’ in use for traders – there are ample takeaway/café/restaurants in Sidmouth.</li> </ul> <p>I feel if the council is looking to enhance trader opportunities they need to consider designated successful locations such as the Ham, Kennaway, Blackmore Gardens – where there is ample space and at the same still consider the residents wishes to the regularity of such events.</p>		
213	LTB1	Lifting of prohibited streets in Sidmouth	<p>We feel that we need to respond to the above consultation. We are concerned like many other traders about the proposal however are specific concerns are as follows:</p> <ul style="list-style-type: none"> <li>•Street Traders do not pay the same business rates that we do and it feels unfair that they should profit from the seasonal visitors, we are here all year round, paying our rates and supporting our high streets to open those spaces to transient traders who potentially have no local connection to the area seems unjust to those of us committed to buildings on our high streets.</li> <li>•Folk Week alone brings in additional visitors to Sidmouth, for which we are very grateful, however this brings in additional pollution to the area, littering and we end up, as business owners, clearing up outside our premises, how would this be taken into account if this was to proceed?</li> <li>•Our roads in Sidmouth town centre are not wide enough for street trading to be conducted safely and our esplanade is of historical interest so how would you propose to manage and maintain safety and the integrity of these areas.</li> <li>•Some roads in Sidmouth, for example Chapel Street, are residential and are completely unsuitable for street trading to occur.</li> </ul> <p>Thank you for giving us the opportunity to respond, we will await your decision once the consultation closes and very much hope that the feedback you receive is listened to and heard.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 171</i></p>	No
214	SN1	Lifting of prohibited streets in Sidmouth	<p>I am a Sidmouth resident and wish to comment on the above draft policy as it relates to Sidmouth.</p> <p>As an active member of the community and a volunteer with a range of local</p>	<p>Response Noted No change to policy is proposed</p>	No

organisations I can see advantages in allowing street trading, properly controlled and monitored, in the areas suggested. I agree fully with Sidmouth Town Council's constructive response to the consultation and would especially support its request that licences only be granted if supported by the Town Council.

I am aware that the Sidmouth Chamber of Commerce is concerned about the impact of the proposals on its members' businesses and I believe there have been many objections to the proposals from local traders. However, there is considerable evidence that allowing street markets and the like can benefit local businesses by increasing footfall and creating a bustling, thriving and inclusive environment. In Nailsworth, Gloucestershire, where I lived for many years before relocating to Sidmouth, there is a thriving monthly local produce/farmers' market in the Town Square which has been operating since 1997. Initially the Chamber of Trade was opposed but when the benefits to the town became clear local traders became supportive, and after a short time the Chamber took over the operation of the market.

In the larger town of Stroud, 4 miles away from Nailsworth, the weekly farmers' market has been a huge success and has won awards and served as a model to others. When it first started in the 1990s Stroud town centre was in serious decline and is now widely acknowledged that the rising fortunes of the town are largely a result of the market, which is a huge draw and supports the local economy with its 'buy local' policy.

Indeed, when I moved to Sidmouth in 2018 I was disappointed to learn that there was no regular farmers' market in the town and that the main reason for this appeared to be the restrictions on street trading.

I feel that EDDC should work closely with the Town Council and the Chamber of Commerce to address the matter's legitimate and understandable concerns about street trading in Sidmouth, ideally drawing on examples of places such as Nailsworth and Stroud. I am sure Stroud District and Nailsworth Town Council, and their respective Chambers of Trade, would be willing to share their positive experiences of opening up their towns to street trading.

I hope that my comments will be of some help to the Council.

*Sidmouth Support 22*

215	GG1	Lifting of prohibited streets in Sidmouth	<p>I wish to strongly object to the proposed removal of controls on street trading in Sidmouth, on the following grounds:</p> <p>1) Most of the named streets, with the exception of the Esplanade, are narrow with narrow or intermittent pavements. Pedestrian circulation is already difficult, especially for those with prams or wheelchairs, and dangerous because of conflict with vehicles and bicycles. Obstructing either pavement or carriageway with vending stalls will make this situation worse, will seriously inconvenience residents and may reduce footfall in the town centre which will damage local businesses</p> <p>2) Far from complementing local premises-based trading and increasing the diversity of consumer choice, mobile vendors are likely to be in direct competition with existing traders. There are already many permanent shops selling fast food close to the beach. These shops rely on trade from both residents and tourists using the beach and sea front. As a resident I want our local traders to survive and thrive and to provide a year-round service, and do not want them to face unfair competition from (largely) outsider-owned mobile vendors with lower overheads who 'cherrypick' the dates when trade is likely to be brisk.</p> <p>3) Vending stalls selling fast food on the Esplanade will exacerbate the nuisance caused by aggressive seagulls and the problem of litter on the beach</p> <p>4) Vending stalls on the Esplanade will be unsightly and out of keeping with the character of the seafront, directly conflicting with the espoused policy aim of "seeking to enhance the character and ambience of local environments."</p> <p>No rationale is given for changing the existing policy, which should be retained and if possible strengthened</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 172</i></p>	No
216	VF1	Lifting of prohibited streets in Sidmouth	<p>I strongly object to the proposal of allowing street traders to operate in Sidmouth through the summer period. This would put our resident shop keepers who are paying for all their overheads in an unacceptable disadvantage.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 173</i></p>	No
217	BW1	Lifting of prohibited streets in Sidmouth	<p>Having just read the article on street trading in the Exmouth Journal I think it is a very good idea. Exmouth town does very little to attract visitors to our town centre and a weekly market would be a winner with residents and visitors alike. The ideal place would be in the Strand Gardens, central and partially</p>	<p>Response Noted No change to policy is proposed</p>	No

			paved.Lets hope that this is going to be ongoing idea for the summer months,maybe May to September.	<i>Exmouth Support 4</i>	
218	CW1	Lifting of prohibited streets in Sidmouth	<p>I have just been notified of the unbelievable plan to allow Street Traders to apply for Consent to Trade on 40 streets, squares, lanes, etc. in Sidmouth.</p> <p>I fully accept that street trading is appropriate during Folk Week but the thought of having to avoid all the havoc and mess created by traders selling food and drink, etc. anywhere but along the Esplanade and, perhaps, by The Ham recreation area at any other time is abhorrent. Who would clear up the mess? In Sidmouth we are very well served by restaurants, cafes, bars, hotels, etc. and I imagine that their proprietors have to pay taxes and would not welcome the competition from traders.</p> <p>Our streets and paths are, in many areas, very narrow and hard to traverse. Will roads be pedestrianised or closed? How will residents access their homes or park?</p> <p>I live at <b>PERSONAL DETAILS REMOVED</b> and my neighbours and myself are already having to worry about taking our lives in our hands driving out of our gateway and avoiding collision with speeding traffic that is completely blocked from our view.</p> <p>As you have guessed, I am completely opposed to this Plan.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 174</i></p>	No
219	DM2	Lifting of prohibited streets in Sidmouth	<p>As a resident of Sidmouth and living on the Esplanade I am writing to object to the proposal to allow street trading on the Esplanade other than at Folk week.</p> <p>The Beauty of Sidmouth is the unspoilt seafront. Allowing street traders to regularly erect unsightly stalls on the seafront will inevitably detract from its character and beauty while adding nothing of real value to the visitor or residents.</p> <p>If we really must have street traders then please not on the seafront. The Ham and town streets all offer better alternatives. As always happens with Folk Week street traders sleep in their vans, double park on the sea front and obstruct the Esplanade.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 175</i></p>	No

			<p>In the consultation I saw no indication of the number and the frequency that stalls would be allowed. Are we to expect that every public holiday the Esplanade will be packed with stalls from end to end?</p> <p>The esplanade is a thing of beauty please don't turn it into yet another down market and tacky resort.</p>		
220	RPS1	Lifting of prohibited streets in Sidmouth	<p>We would like to suggest that Beach/Street Trading to the extent mentioned would be thoroughly out of context with the Regency Town of Sidmouth for the reasons stated by the SVA and Chamber of Commerce. However, as an alternative, if we were to have an Open Air Market on The Ham on one day a week, we think this would be a far better option.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 176</i></p>	No
221	JIB1	Lifting of prohibited streets in Sidmouth	<p>Although we agree with your aspirations - increasing trade, visitors etc. and hopefully revenue for Sidmouth. We feel many of the roads in your proposal are totally unsuitable.</p> <p>The issues are - Safety of people due to increase in traffic with a mix of pedestrians, mobility scooters and of course the number of tourist buses and the increase in delivery lorries.</p> <p>There will also be serious traffic problems due to lack of car parking, which is expensive, and last but by no means least, are we totally abandoning our local trades people, some of whom are already struggling with rising costs. Please give this some serious thought</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 177</i></p>	No
222	JH2	Lifting of prohibited streets in Sidmouth	<p>Firstly, I ask a question... "Why are you trying to destroy Sidmouth as a Regency town?" Visitors flock to Sidmouth because it is what it is. Unique. There is no requirement for street traders, particularly as there are so many empty shops or leases for sale.... Just to name a few.. Sarah Janes. Barclays Bank. Sidmouth Unwrapped. Someday Something. Blues.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 178</i></p>	No

The Loft.  
 Fore Street Gallery.  
 The Dairy Shop.  
 Art Sidmouth.  
 Browns Kitchen Bakery.  
 Cards, (NO 83).  
 Lloyds.  
 Joules.  
 Sidmouth Post Office.  
 Willow Photographic Studio.  
 M&Co.

Where is the need to have stalls selling seasonal craft items? How ridiculous! These items are easily provided by the remaining stores in the town. I read that trading hours would be between 8am and 10pm, this would cause an enormous amount of disruption and lead to an increase in anti-social behaviour, particularly in the evening. How about the lives of RESIDENTS who live adjacent to these trading sites?

You state that “ One of our key aims , as part of the new policy , is to ensure the needs of traders, residents , businesses and visitors alike are all met” How on earth is this going to happen? Everyone that I have spoken to is totally against the idea. Also, speaking to holidaymakers last week, they all said that they would no longer visit Sidmouth if this street trading takes place as it would NO LONGER BE SIDMOUTH!

The phrase “ Ultimately, the aim is for us to have a street trading policy which compliments the amazing businesses we have here in East Devon, while also be sensitive to the needs of our resident”, is absolutely ridiculous. How can you complement amazing businesses when they are closing down? Residents and tourists do not need a greater choice of products, these amazing businesses that we already have need support to stay open.

Surely there will be a huge decrease in income to EDDC when the Buisness Rates from these closed stores cease. Can you really afford this decrease? Folk week is a different matter, it is an annual event where there are traders for a week, mostly selling items that no-one wants to buy.

If you do want street traders, how about using our existing MARKET SQUARE and hold weekly farmers markets selling LOCALLY PRODUCED items and food. Traders are not needed in the streets . Many people that I have spoken to have said that they would be afraid to go out and are worried about anti-social

			behaviour. Please reconsider this idea and do not turn beautiful Sidmouth into a place where no-one wants to live nor visit.		
223	DOPP1	Lifting of prohibited streets in Sidmouth	We as a local fast-food trader, <b>ORGANISATIONS NAME REMOVED</b> , would like to object the sea front traders. The reason which makes us unhappy with this decision is that our decreasing business over the last a few months. We couldn't make the expected business since September and still not making it. Summer is the only term when we actually have good business. Having hot food sellers at the sea front will worsen our business, not just ours but most of the local takeaway shops in Sidmouth, all seasons of the year, just like it does during folk week.  I hope you take my and all local food sellers concerns seriously.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 179</i>	No
224	YOPP1	Lifting of prohibited streets in Sidmouth	We as a local fast-food trader, <b>ORGANISATIONS NAME REMOVED</b> , would like to object the sea front traders. The reason which makes us unhappy with this decision is that our decreasing business over the last a few months. We couldn't make the expected business since September and still not making it. Summer is the only term when we actually have good business. Having hot food sellers at the sea front will worsen our business, not just ours but most of the local takeaway shops in Sidmouth, all seasons of the year, just like it does during folk week.  I hope you take my and all local food sellers concerns seriously.	Response Noted No change to policy is proposed <i>Sidmouth Objection 180</i>  Differing person and email	No
225	NM1	Lifting of prohibited streets in Sidmouth	I am just responding to your current survey.  I welcome the opportunity to be consulted. I am opposed to an increase in street trading in Sidmouth over long periods e.g monthly, seasonal or yearly basis.  My reasons are: a) I do not wish Sidmouth to lose their vibrant town centre to more charity shops as business is sucked away from shops which pay higher rent and rates b) I do not want an increase in unsustainable items being sold in Sidmouth which add to litter problems or sea pollution c) I want Sidmouth to retain its relaxed, wide, easy to access to promenades.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 181</i>	No

			<p>I do think street trading during the folk festival is largely beneficial although some of the stalls trade poor quality items which detract from the wider town vibe.</p> <p>I would welcome EDDC looking at what spaces can be offered for small to medium sized entrepreneurial enterprises to develop.</p>		
226	SAO1	Lifting of prohibited streets in Sidmouth	<p>We as a local fast-food trader, <b>ORGANISATIONS NAME REMOVED</b>, would like to object the sea front traders.</p> <p>The reason which makes us unhappy with this decision is that our decreasing business over the last a few months. We couldn't make the expected business since September and still not making it. Summer is the only term when we actually have good business. Having hot food sellers at the sea front will worsen our business, not just ours but most of the local takeaway shops in Sidmouth, all seasons of the year, just like it does during folk week.</p> <p>I hope you take my and all local food sellers concerns seriously.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 182</i></p>	No
227	JB3	Lifting of prohibited streets in Sidmouth	<p>We have studied the proposed extensions to street trading and would like to provide the following response.</p> <p>Whilst we have a considerable interest in the year round trading health of all Sidmouth businesses, in respect of their ability to support the Folk Festival, we feel our response should relate simply to the period of the annual Folk Festival, which normally occurs during an 8 day period in late July/1st week of August each year. Festival activity in the streets and festival venues and associated entertainment, mainly in licensed premises, brings the town alive with a very high level of activity in all the streets in the centre of the town.</p> <p>Broadly, during the Festival, there is already a very considerable opportunity for trading (from many temporary stalls) under the control of EDDC on the Promenade, alongside the Esplanade roadway. We believe that further trading in the crowded town streets during the Festival period would be problematical from a safety viewpoint and disruptive to the Festival's activities.</p> <p>We refer specifically to the following:</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 183 Folk Festival Week related only</i></p>	No

page 014			<ul style="list-style-type: none"> <li>•The Festival has long standing, traditional processions of dancers and musicians along the Esplanade, through the narrow streets in the centre of the town, up to Blackmore Gardens.</li> <li>•Street entertainment takes place in the Market Square during the daytime, into the early evening, attracting large crowds which completely fill this area</li> <li>•The sheer volume of visitors/festival goers who arrive in the town each day to participate in the Festival activities and simply to enjoy the atmosphere is very considerable, between 5,000 to 8,000 per day. They already fill the narrow town centre streets, leaving no further space for trading.</li> </ul> <p>It should also be recognised that many local businesses derive a significant portion of their annual income during the Festival week. Any further trading, in addition to that on the Promenade, reduces the viability of these core town businesses (and their ability to support the Festival) and the attractiveness of the town as a year round tourist attraction.</p> <p>We trust our representation will be given due consideration, in respect of the Festival duration in particular. We would be very happy to provide any further information that is required and to discuss our comments set out above.</p>		
228	TC2	Lifting of prohibited streets in Sidmouth	<p>Sidmouth street trading NO NO NO</p> <p>We have managed to keep Sidmouth fairly free from tat. Support or existing traders please.</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 184</i></p>	
229	BSMS1	General	<p>Thank you for the opportunity to take part in this consultation. We have picked out specific clauses that we support or object to and offered reasons why and solutions where applicable</p> <p>We would like to be kept up to date on this consultation and policy development</p> <p>With best wishes</p> <p>3 3.1 f - support - great to see the definition clearly laid out that captures and excludes from exemption the “Facebook ice cream pop ups in a car park” companies.</p>	<p>Response Noted</p> <p>No change to policy is proposed – both support and Objection to overall policy.</p> <p>No comment required</p>	No

<p>3 3.2 a - object to blanket exemption for school fetes etc. we would support them needing to apply and nil cost for license. Giving them this exemption removed scrutiny and due diligence in terms of health and safety, food hygiene checks and insurance checks. Many new traders start at this level and setting out your stall (literally) without high standards from the beginning sets the wrong practices in place.</p> <p>Designation of space - the exemption for town and parish councils from needing a license but the inclusion that a license is needed when in close proximity to retail/commercial areas seems at odds. Town centres are constantly evolving and what was previously a commercial area is often changing to be more and more residential. How would licensing determine what is commercial? Would there be a percentage of eatable premises limit? What about vacancies? This needs to be better defined and we think the current wording would present barriers to a town council seeking to increase trading and interest through markets in a High Street setting</p> <p>4.2 a - object. Giving organisers the option of charging a penny and then not having to apply for a street license is grossly unfair to free to attend events. We organise free to attend events often paying thousands of pounds in street trading license fees and submitting all the correct paperwork and consultation. When we see other operators circumventing the system and not paying and supporting the LA by charging a very low entrance fee (and boasting about their circumvention) our blood boils. It's just not right: please reconsider</p> <p>4.2 e support: great to see curtleige trading being explicitly covered</p> <p>Stage 1</p> <p>6.4 environmental and sustainability factors are missing. Why would you look to grant a consent for a company that do not meet your green/low carbon/environmental goals? I.e. diesel generators, engines running on ice cream vans (solar ones are available), packaging choices, waste disposal, etc etc</p> <p>6.5 block booking: whole heartedly support</p> <p>6.8 fees link is not there</p>	<p>Application fees will be required when trading is on a public area, school fetes may not always require Consent on private land</p> <p>Town &amp; Parish councils are not exempt from Consent requirements</p> <p>Not applicable to East Devon which does not currently charge trading fees</p> <p>Noted</p> <p>The consultation was shared with EDDC Climate Officer and Environmental Health Teams who did not respond.</p>
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			Stage 2 - whose responsibility is it to display the application notice at the proposed site during consultation?	This is not an EDDC process for Street Trading	
230	JH3	Lifting of prohibited streets in Sidmouth	This proposition is unwarranted. It would cause unnecessary congestion problems within the town, generating extra pollution in all its forms. This is nothing more than an attempt to generate more income for the local taxation coffers and if instigated would harm existing traders within the town and do nothing but harm the quality of life within Sidmouth town. Reject this idea.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 185</i>	No
231	CH3	Lifting of prohibited streets in Sidmouth	I oppose the liberalisation of street trading beyond the week of Folk Week. It will be detrimental to permanent traders in town and importantly, spoil the ambience along the Esplanade for which Sidmouth is famed. The traders are likely to peddle plastic rubbish or dubious 'crafts' if the Folk Week is anything to go by.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 186</i>	No
232 page 116	IM1	Lifting of prohibited streets in Sidmouth	This is madness. Why change what works well. This Regency beautiful and well known town will become a proliferation of ice cream vans and coffee and tat sellers. Protect the disabled, mothers with prams and those with poor sight. What is the council thinking of? Is it hoping to generate income? The council should be protecting the resident population	Response Noted No change to policy is proposed  <i>Sidmouth Objection 187</i>	No
233	CH4	Lifting of prohibited streets in Sidmouth	I feel that proposal for the new Street Trading will be extremely unfair on all of the businesses in the town, especially the small independent shops, cafes etc which d suffer during folk week.  I know this as my partner and I used to run a very successful business in the town for many years. If this proposal gets the go ahead it is most likely to be very unfair competition for all of our established trades who pay very high rent, Rates and have to pay for their own rubbish to be removed. Many of the proposed roads are residential streets which already have problems with very narrow pavements and on street parking. Have all their residents in the proposed roads been notified and asked their personal opinion? I think the answer to this is NO. As many of the residents are elderly and a lot do not have access to the internet they will be oblivious to what is happening in the town and streets	Response Noted No change to policy is proposed <i>Sidmouth Objection 188</i> Postage Response received 22/02	No

			<p>where they live.          What will be done with regard to all the extra rubbish/littler overflowing bins etc?          At present we do not have enough public toilets in the town, so with more traders and visitors coming into the town that will also cause more problems and where are all these extra people going to park?          As there is certainly not enough parking for locals and regular visitors at the best of times.</p>		
234	MLA1	Lifting of prohibited streets in Sidmouth	<p>We are writing to you regarding the prospect of having stalls on the front at Sidmouth between May and September.          As regular visitors to Sidmouth it is our favourite place to visit, we both think the idea of putting stalls on the seafront will spoil the look of the front.          We as many people love sitting on the benches and the wall to see the view to the sea and this will be lost.          If you have to have stalls how about putting them on the green at the Ham. We hope the stalls are not placed on the seafront as the views are precious.</p>	<p>Response Noted          No change to policy is proposed  <i>Sidmouth Objection 189</i>          Postage Response received 23/02</p>	No
235	IME1	Lifting of prohibited streets in Sidmouth	<p>I would like to support Sidmouth Town Councils position regarding a relaxation of street trading in the town. I feel there is limited scope for any relaxation. It should certainly not create unfair completion for the towns traders with their significant overheads. Bearing in mind the geography of the town certain roads would clearly not be suitable for street trading.</p>	<p>Response Noted          No change to policy is proposed  <i>Sidmouth Objection 190</i>          Note however the quote states "support"</p>	No
236	AC2	Lifting of prohibited streets in Sidmouth	<p>I am writing to say that I would disapprove of Street Traders being allowed in Sidmouth for longer than Folk Week.          It seems very unreasonable when local businesses have to pay Business rates. I think there would also be a lot more litter left around.</p>	<p>Response Noted          No change to policy is proposed  <i>Sidmouth Objection 191</i></p>	No
237	JW3	Lifting of prohibited streets in Sidmouth	<p>As a resident of one of the streets designated - I strongly object.          Letter attached to email below:            I have learnt that EDDC proposes to allow hawkers and pedlars to apply to set up stalls in 30, so-called 'consent streets' in lower Sidmouth to sell food, beverages and various goods, at any time from May to September.</p>	<p>Response Noted          No change to policy is proposed    <i>Sidmouth Objection 192</i>            Hawkers/Pedlars fall</p>	No

As a resident of lower Sidmouth, I strongly object to this proposal - on a number of grounds:

1.This is a residential area - residents have the legal right to enjoy 'peaceful enjoyment of their homes' free from oppressive nuisance caused by the sight, sound and smells that these stalls would doubtless create...for four months. Council tax is paid for home-owners to enjoy their neighbourhoods, not have them turned into bazaars.

2.Numerous stalls selling food and beverages will create hygiene problems. Sidmouth's seagull problem is already significant - the birds intimidate people by swooping to steal food and by excreting on them. Why encourage more of this? It will only deter people from patronising the town's shop. Food waste will undoubtedly encourage rats too. I know that they are already around, for my cat has caught one recently.

3.Residents of lower Sidmouth would feel unreasonably swamped and imposed upon and quality of life would diminish. Residents already tolerate - many enjoy - the Folk Week carnival. In 2022 a 4-day Jazz & Blues Festival, 40hrs of electric amplified music, was set-up in the heart of a residential neighbourhood. EDDC Environmental Health investigated, and found that it caused a substantial nuisance in breach of the Licensing Act. It was disappointing then to note that it is now scheduled to run for 5-days in 2023.

4.Nuisance would also be caused by the chaotic traffic and parking problems that would arise. Most likely, the operator of each stall would carry his/her goods in a van. On any given day, there may be dozens of these stalls, which would mean dozens of vans. Where would these vehicles park? In summer, there is insufficient parking for local businesses and residents. What would be the effect of dozens of vans?

5.Itinerant travellers and traders tend to sleep in their vehicles, staying in a town for many days – in Sidmouth, they usually park in the lower town, Bickwell Valley or Manor Road car-park (which is forbidden). They cook, wash and urinate outside their vehicles, quite a number have dogs which also foul the area - this is both a nuisance and a hygiene problem.

6.Sidmouth's regular businesses pay not insignificant business rates. Given the

outside this policy and are not intended traders under the review

page 119			<p>nature and cycle of trade, they make most of their profits in the summer months. Street traders will take a good slice of business away from them - then it will not be worth their while to run their business, and close it. This will hollow out the town. Hollowed out towns attract anti-social behaviour.</p> <p>7. Street trading will create substantial amounts of refuse - which EDDC will have to remove. Increasing this service will inevitably result in Council Tax increases for the residents whose quality of life would be reduced.</p> <p>In summary, it seems that none of this 'street consent' policy has been thought through properly. It would create nothing of any value for Sidmouth - just opportunities for quick, untaxed profits for fly-by-night traders most of whom do not live in East Devon. They would leave behind a residue of mess, hygiene problems, resentment and distress.</p> <p>Multiple public nuisances would be caused by this proposal - nuisances that the Licensing Act compels local authorities to guard against. In the long-term, the jewel of East Devon's crown would be severely tarnished.</p> <p>I urge you to abandon this proposal.</p>		
238	HW3	General	<p>Thank you for inviting me to comment. I found the Policy very clear and straightforward to understand. I have a few thoughts to contribute to your consultation:</p> <p>Page 3 item 1.4: *Could we insert "health"? as in "Public <i>health and safety</i> will be a key consideration..."</p> <p>Page 5 Consents sections 4.3-4.5: Could we state that numbers of licenses will be moderated?</p> <p>Page 8 stage 3 site assessment section 6.19: Could we add a bullet stating that for food vendors, proximity to other vendors will be a consideration? [or at least add "see also 6.29"]</p> <p>And re the last bullet in 6.19, could we extend the Cranbrook approach to <i>all</i></p>	<p>Response Noted</p> <p>*Change to policy is proposed</p> <p>Numbers are not moderated or capped outside of conflict to existing businesses</p> <p>Site assessment is specific regarding all key considerations.</p> <p>The Healthy Town status</p>	YES

			<p>new developments, given that we'd want each new development to be as healthy as possible from the outset?</p> <p>I can't see any references in the Policy to climate emergency or sustainability issues. For example could vendors be asked to switch off engines whenever possible / be encouraged to go electric... etc. [Good for people, good for the planet...] I don't know who else you've shared this with so you may've already got this feedback.</p>	<p>drove this.</p> <p>The consultation was shared with EDDC Climate Officer and Environmental Health Teams who has not responded to the policy consultation – see existing Section 6.30 to 6.32</p>	
239	LO1	Lifting of prohibited streets in Sidmouth	<p>I would like to put forward my views against the proposal to change the street trading policy in Sidmouth – there is currently an enormous amount of pressure on the high street businesses, more than there ever has been.</p> <p>The internet has already had an immense impact on all high street businesses, the full impact of which was exacerbated greatly by the pandemic. Following that we have the same vast cost increases as all households, a drop in spending and difficulty with staffing for many. In Sidmouth we have had the additional hit of the car parking prices doubling overnight last year which had an immediate negative response to daily business. With all these challenges there has been and continues to be an enormous amount of businesses that have closed, scaled down, or currently are up for sale or in the process of being closed.</p> <p>The EDDC &amp; Sidmouth Councils need to think very carefully about what is best for Sidmouth town centre for the long term, for our children. If you put in place yet another challenge to the high street businesses that are still striving to survive, especially one as potentially hard hitting as this could be for some, you may find that there is a very sad high looking high street before the year is out. Consider what happens out of season when all your street traders are nowhere to be seen and all the shops have been put out of business; what will people come to Sidmouth for and where will your business rates come from then? We already have just about one of every charity shop in the town but it really can't take any more pressure.</p> <p>Short-term strategies are what is going to kill this town centre and all the year-round businesses currently struggling to fight the battle to stay in business, before you know it you'll have casinos and betting shops to go with your market traders and imagine what that will do to house prices.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 193</i></p>	No

			Continue with this proposal at the peril of the Sidmouth as you know it. All that is good here is very precariously balanced right now.		
240	JW4	Lifting of prohibited streets in Sidmouth	<p>As a visitor to Sidmouth on holiday currently for the first time, I would like to say how impressed I am with the special character of the town.</p> <p>The centre offers a diverse mix of mainly local independent traders, something almost unheard of these days, and vacancy rates are a lot lower than most towns I have visited.</p> <p>I would like to day that I feel strongly that permitting street trading would be very damaging to the special character and retail offer of the town.</p> <p>Having worked in Liverpool for many years, the presence of street traders on Church Street, the main shopping street, has been a long-standing bone of contention.</p> <p>The stalls generally sell low price and low quality goods and the permanent retailers complain that they undermine their trade and cause a nuisance through obstructing access to and the visibility of their premises, reducing footfall as people tend to walk down the middle of the street.</p> <p>The accompanying “street food” stalls tend to sell low quality fast food that generate a lot of litter.</p> <p>The usual array of associated buskers with portable PA systems and “street performers” creating a wall of noise pollution usually completes the list of irritants to deter you from venturing into town.</p> <p>The reality of street trading in modern Britain seldom lives up to the bohemian vision imagined, and permitting it will help to kill of the regular traders who having managed to cling on through the covid lockdown, the decline in footfall due to people WFH, and still having to pay high rent, rates and energy bills.</p> <p>Sidmouth is a very special place. Don’t destroy its character so it becomes like every other run down, half empty poundshop filled high street in the land.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 194</i></p>	No
241	TS1	Lifting of prohibited streets in Sidmouth	<p>I wanted to formally register an objection to the proposed street trading here in Sidmouth.</p> <p>Having lived on and around The Esplanade my entire life, it's an area I know well and care about greatly.</p> <p>The draw of the town's amazing independent shops, Esplanade, market square and surrounding roads bring people to Sidmouth and have done for hundreds of years. Seventy of which my family have been operating Hotels and</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 195</i></p>	No

hospitality establishments.

The shops and hotels work hand in hand to employ locals, provide accommodation, pay business rates and contribute to the maintenance of their properties, conducted by local tradespeople. Which in turn means that the seafront is one of the most recognisable and visited on the south coast.

To add street vendors into the mix would go completely against all of those practices. Disruption to the roads would create issues for locals and deliveries to the local businesses. They wouldn't create jobs, or contribute to the local economy and the clutter, waste and emissions would take away all that makes Sidmouth what it is.

As a fourth generation Hotelier, I am venturing out on my own and opening **ORGANISATIONS NAME REMOVED** in front of **ORGANISATIONS NAME REMOVED**. All of the issues above would directly impact me, during the busy trading season, due to my location on the esplanade. I highly doubt the addition of traders would bring more people to Sidmouth, it would simply make it more congested and hard to navigate for those who would have been visiting anyway.

I'm sure you can appreciate the concern myself and my fellow staff, friends and family feel - along with all of my fellow business people and Sidmouthians. If the brick and mortar businesses suffer, so does the entire town. Across our businesses we provide £10,000+ sponsorship and support for local sports teams and good causes. recently adding the food bank to the list. It would be good to consider whether street vendors would do the same?

I have summarised the points above in the bulletpoints below.

Best regards,

1. Unfair competition for business rate paying brick and mortar businesses - the majority of which are family run and owned, trading 365 days a year and contributing to the local community through employment and sponsorships.
2. We are already trading in a period of intense unprecedented challenges. Many of the stalls, vans, and trailers will be coming from outside the area. Creating more emissions in peak times, disrupting deliveries and guest arrivals. Whilst drawing out vital funds from visiting tourists that local businesses need to survive the winter.
3. Street trading greatly increases litter and pollution, leaving us as local businesses to clean up the mess, including using street bins to dispose of waste.

			<p>4. Our road system, listed buildings, conservation Areas, Esplanade and Beach, are simply not set up to facilitate street trading as well as the footfall of visitors to the town centre.</p> <p>Sidmouth works because it is independent and the community supports tourism and re-invests in the Sid Valley's people, property and good causes. Disruption to this would cause negative effects that would take years to undo.</p>		
242	ED1	Lifting of prohibited streets in Sidmouth	<p>The EDDC proposals for Sidmouth appear without any case for change being made.</p> <p>What would the benefits be? Who would benefit? And then what would be the detriments? Who would suffer the detriments?</p> <p>The list of streets where it is proposed to change the designation from "Prohibited" to "Consent Street" makes extraordinary reading to such an extent that one wonders whether the list was prepared by anyone who has conducted a site visit to the area.</p> <p>Most of the streets named are wholly or almost wholly residential, and even the mixed use and commercial streets are mostly narrow with narrow pavements. This means that in places, even during normal day to day use, one stationary pedestrian is sufficient to block the pavement. The thought of a trading stall, however modest in size, being permitted in such a location would be laughable if it were not so serious.</p> <p>Then there is vehicle parking. If the proposed change of designation results in any reduction in the number of car parking places in the town, the town as a whole will suffer damage. The time-limited free on street parking places currently available are essential to keep the life of the town and surrounding area flowing for residents who live away from bus routes, and from the surrounding villages, etc. The current pricing of car parks is already detrimental to the town.</p> <p>Sidmouth is fortunate to have such a good range of shops both large and small. During these years of National handwringing about the sad state of our High Streets it is essential that all levels of Local Government play their part in supporting and encouraging these businesses so that they both survive and thrive. It is surely self evident that Local Government should do nothing that might harm local High Streets.</p> <p>Whilst healthy competition can be good for businesses, the overheads of</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 196</i></p>	No

page 124			<p>running a market stall are nothing in comparison with those of running a shop on the High Street. And whilst market stalls are likely to harm or kill the established shops during the Summer months by providing unfair competition, the residents of the town need those goods and services during the Winter months too, when the stalls would be absent and the shops have died. How does that help the town or the wider area of East Devon?</p> <p>Sidmouth has many residents who have moved here to escape the intensity of life in other towns and cities. Similarly it attracts visitors who appreciate the beauty of the area, the rich selection of existing shops and other businesses, and who appreciate the promenade for its original purpose of walking, in sight of the sea and coast beyond.</p> <p>The seafront is a place for everyone to link with Nature, be they old or young, fit or limited in their movement. This is for the benefit of mind, spirit and body. Health and wellbeing.</p> <p>Whilst the presence of market stalls, etc. upon the seafront for the limited time of the Folk Festival is one thing, the possibility of market stalls stretched along the seafront for frequent or long periods during the whole of the Summer months, so that the seaside scene is diminished or even disappears from view, is horrifying. This would destroy the whole atmosphere of the town to the detriment of all who live, work, visit and grow up here.</p> <p>I therefore object to the EDDCs proposals for Sidmouth.</p>		
243	RPB1	Lifting of prohibited streets in Sidmouth	<p>As long term residents of Sidmouth, we are opposed to any changes in legislation which would allow street traders to apply for licences in any residential streets, on the beach, Ham or Promenade.</p> <p>We take this view because of the risk of unfair trading competition with existing businesses, risk of extra litter and the unsuitability of most of our roads for outdoor trading.</p> <p>We support the Town Council in their opposition to the full scale lifting of current restrictions.</p> <p>Whilst we understand the argument that street trading may offer diverse facilities to visitors, we believe street trading should be the exception rather than the rule.</p> <p>Sidmouth does not need any expansion in street trading.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 197</i></p>	No
244	MJR1	Lifting of	It is lovely to have The Ham, The Esplanade and the grounds of Kennaway	Response Noted	No

		prohibited streets in Sidmouth	<p>House as consent areas during Folk Week and other major events such as The Red Arrows.</p> <p>However, while consideration of new innovation is welcome, we are very much against and concerned about the current proposal to extend these arrangements for several reasons:</p> <ul style="list-style-type: none"> <li>· We currently have really good traders during special events, many of whom are local. These will go under if there are more traders from further afield and we will lose the opportunity to support local businesses.</li> <li>· The central streets in Sidmouth, including the conservation areas – as well as the beach, promenade, and esplanade are just not suitable for more traders. Outside traders will naturally want to come at peak times. Currently, it is already difficult at such times to navigate the beach, promenade, and esplanade - and many residents find themselves needing to walk into the roads as the pavements are so crowded. With elderly residents, this is positively dangerous.</li> <li>· This is even more of an issue on residential roads – where there are often enormous difficulties for child buggies, mobility scooters and walking frames in particular, at times of crowds. The addition of traders will pose we feel, health and safety risks, as well as discourage the elderly from going out, with impacts on their physical and mental health.</li> <li>· The consent street system has been an issue in other East Devon towns. Sidmouth does not have a history of difficulties while the press reveals that other towns are often in the news as a result of issues arising from street trading. Concerns relate to conflicts, crowding and litter. We need to learn from this – surely, a review of existing arrangements in other towns and the difficulties which have arisen need analysing and rectifying, rather than adding to the situation?</li> </ul> <p>Thank you for the opportunity to offer feedback.</p>	<p>No change to policy is proposed</p> <p><i>Sidmouth Objection 198</i></p>	
245	JA2	Lifting of prohibited streets in Sidmouth	<p>To whom this is concerns @the East Devon office. My name is Mrs Jean Adlam @ live in OLD FORE ST. I am completely against having any more mobile shops or what ever you want to call them in my street . Dont you think the shops are already having a hard time making a living what about the shops that have been struggling for the last few years and are now saying there going to retire, Some are still youngsters, Do you think having stinking hot dogs like a fair ground in the town centre is ok . Once you give the go ahead you wont be able to say what can or cant be around because they will start with all this other</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 199</i></p>	No

			<p>rubbish talk,if you want this sort of cheap shopping use some of your own precious car park spaces behind BOOTS and make it more like a market But I think that sort of shopping is best only for the FOLK FESTIVAL And when you have street music players make them move there site every 15 minutes like they do abroad and I dont mean a FOOT away. What sort of money do you think your going to make from these people when the shop keepers are paying all there high rates. A few years ago we that lived in the street went along with the idea of not driving down OLd Fore St to make it safer and more relaxing for visitors to stroll around at there own leisure from10am till 5pm unless of course we had to lve done that for years . as a property owner. I think you all must be forgetting that there are people with families live above these shops in the town if there lucky</p>		
246	JM5	Lifting of prohibited streets in Sidmouth	<p>I am concerned and astounded at the long list of streets in Sidmouth, [copied below], for which you propose to change the designation. The current limited street trading along the Promenade works very well. Change would not only compromise the amenity of residents but detract from our much-appreciated low key, relaxed and street clean tourist ambience.</p> <p>The town Council have suggested that The Market Square, New Street, Old Fore Street, Church Street and The Esplanade (road only, including the turning circle at The Ham) might be dedesignated but only when trading has the support of the town council.</p> <p>EDDC appear to have limited resources for litter clean ups in the area generally. This is not a criticism, merely an observation. Currently at peak times, you just about manage to empty bins along the promenade before they over flow. How would you propose to clean up effectively in additional areas which would inevitably attract litter? This issue has not been addressed in your proposals.</p> <p>Three of the roads on your list are the main routes into Sidmouth, obviously unsuited to street trading. Why are these on your list?</p> <p>This leads me to conclude that your list was merely a paper exercise uninformed by local knowledge or indeed common sense. Our Town Council is the body that understands the area and their recommendations should be adopted and only applications which have their support should be granted.</p> <p>Part of Sidmouth's attraction is its relaxed atmosphere with little of the tourist tat and trinkets which blight other areas. We have a wide range of excellent shops which provide a wealth of shopping opportunities. Furthermore, we</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 200</i></p>	No

			<p>have a successful commercial model which works well for the town and it would be regrettable if EDDC were to compromise this and over ride local opinion as expressed by Sidmouth Town Council. I strongly urge you to reconsider.</p> <p>I would appreciate a response to my letter.</p>		
247	MJW1	Lifting of prohibited streets in Sidmouth	<p>We would like to register our disapproval of the suggestion of street trading in the streets of Sidmouth. As residents of the town centre, Heydons Lane, we do not wish to see any change to the present arrangement that allows market stalls only in Folk Week.</p>	<p>Response Noted No change to policy is proposed <i>Sidmouth Objection 201</i></p>	No
248	MOC1	Lifting of prohibited streets in Sidmouth	<p>I would not like to see street trading extended along the Esplanade from May until September.</p> <p>I have lived in Sidmouth for the last 14 months and love the town and all it has to offer. I have attended lots of events and enjoyed them, Folk Festival week, Daffodil Day, The Jazz Festival, The SeaFest, The Regatta, Sidmouth Carnival, Connaught Gardens at Christmas and Sidmouth Eats.</p> <p>I feel the present level of street trading for all these events to be the right balance. My concerns about allowing street traders along the Esplanade from May to September relates to restricting the space for people to be able to walk, sit and enjoy the atmosphere. Street traders will arrive in vehicles and take up spaces for visitors once they have set up their stalls. I also feel the town's shops will suffer even more at a time when they are already facing financial challenges. I have no connections with any businesses in the town.</p>	<p>Response Noted No change to policy is proposed  <i>Sidmouth Objection 202</i></p>	No
249	SM2	Lifting of prohibited streets in Sidmouth	<p>I wish to object to the proposed changes to street trading. In my view this will adversely affect the existing traders in their shops and premises. These people are the backbone of the town and competing with them in an already harsh environment can be only detrimental. They bring in the tourists, employ local people and pay taxes and council taxes.</p> <p>It will also alter the atmosphere in the town with increased congestion and the associated litter and untidiness this is likely to create. These proposed changes might detract people visiting as the original "charm" might be lost.</p> <p>Keeping street trading to the promenade is acceptable and brings the right balance to the area</p>	<p>Response Noted No change to policy is proposed  <i>Sidmouth Objection 203</i></p>	No

250	RS1	Lifting of prohibited streets in Sidmouth	<p>Having reviewed the councils plans to remove the current street trading restrictions that cover Sidmouth Town Centre I am writing to express my objection to these proposals as a resident of the town.</p> <p>Presently Sidmouth has a vast range of retailers and traders located in and around the town centre. These shops offer a wide range of products and services, employ local people and invest in the community they serve. Visitors to the town express how great Sidmouth and its shopping experience is and how unique it is compared to other local and not so local towns. These visitors enjoy the look and feel Sidmouth already offers and this is why many return year in, year out.</p> <p>Allowing vendors to set up for a day/week as part of a temporary event, selling products that may compete with established retailers in the town should not be allowed. It will cheapen the town and will make Sidmouth lose some of the magic that it has over other towns in East Devon – people from Seaton, Honiton, Ottery and beyond shop here because they like what is offered already in the town. Temporary stalls will not offer anything EXTRA.</p> <p>This is being considered PURELY as a money making exercise for EDDC. Sidmouth can generate the council cash for licencing these events, as Sidmouth is seen as an asset that the council can exploit and use. This is all that this proposal is about.</p> <p>Listen to the people. You have already impacted visitors to the town with the EXTORTIONATE car park price hikes for the summer months. Stop.</p> <p>Maybe the Head of Licencing needs to come to the town and address the residents and retailers about the proposal he is heading up.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 204</i></p>	No
251	BP1	Lifting of prohibited streets in Sidmouth	<p>To allow Street Traders in Sidmouth would under mine all of the shops and catering establishments that are struggling now, they need to make the money to survive the winter months.</p> <p>As a retailer for many many years it is tough on the High Street, we have had a lot to deal with,Covid, Energy Prices, cost of living. It is affecting us all.</p> <p>Reducing our business rates would help. They are crippling.</p> <p>We have already lost some Big Names in Sidmouth and the more established business will also follow suit and close.</p> <p>Street Trading yes will increase the foot fall in the Town, but the Car Parks are inadequate, over priced. Is this issue going to be solved. No, the Street Trader have to park also. The Litter is another problem, not enough bins.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 205</i></p>	No

			No to Street Traders		
252	CC2	Lifting of prohibited streets in Sidmouth	<p>I am very concerned to see that nearly the whole of Sidmouth streets are to be considered as Consent Streets and I can find no explanation as to why this is being proposed.</p> <p>Whilst I enjoy the annual folk festival the more recent addition of stalls along the Esplanade is not an improvement. It's only for one week but takes revenue away from the permanent shops and traders in the town.</p> <p>Granting Consent Street status you may say will not increase the number or frequency of stalls, then why do it? Increasing the licensing of stalls will take further revenue from businesses already struggling, will change the atmosphere the town with many return visitors enjoying our more 'genteel' ambience. Stalls cause congestion meaning more pedestrians walking on the road endangering themselves and road users. The smell from hot food stalls is unpleasant for people enjoying refreshments at hotels and cafes along the Esplanade (I would add that BBQs also add to this, but not seen a consultation on their use!).</p> <p>I was interested to read the conditions of consent and wondered how these are monitored. Is it a requirement of the application to provide evidence of the necessary Public Liability Insurance, and are the structures, consents and insurances checked by council officials when stalls are erected? I can't recall seeing Insurance Certificates being displayed previously</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 206</i></p>	No
253	FW1	Lifting of prohibited streets in Sidmouth	<p>I wish to object most strongly to the prospect allowing street trading in the small lovely town of Sidmouth. The chaos created by the folk festival in August must not be allowed to continue throughout the period of time that the council is proposing. It will be unfair to businesses which rely upon spring and summer tourists and will attract a great many undesirable people to the town, I used to live in Kent and the small town of Brenchley held a horse fair once a year which attracted a great many unwelcome visitors. Crime rates soared and many small businesses were force to close for the duration of the fair and for quite a while afterwards. The banks and bulding societies were robbed on several occasions as there was insfficient law presence to deal with the increase in the crime rate.</p> <p>The access for emergency vehicles would be severely restricted by the</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 207</i></p>	No

page 139			<p>increased number of stalls and of course the increased number of people attending what would basically become a massive street market would take up what little car parking space there is at the moment. Also there would not be the manpower available to supervise and keep a check on unlicensed traders who would no doubt show up in droves as the word got out. There would have to be an increased police presence in the town which would have to be paid for, No doubt an increase in council tax would have to be levied on the residents of the town.</p> <p>It is painfully obvious that the facilities in Sidmouth would not be able to cope with the increased temporary population. The demand for emergency services would increase and doctors surgeries which are already overloaded would not be able to cope.</p> <p>We have all seen the amount of rubbish that markets generate and this would also have to be cleared at the expense of Sidmouth town no doubt. I am in no doubt that the instigators of this insane idea have not thought it through and considered all the consequences. Please just leave it as it is. We can cope with the folk festival and the influx of mostly elderly tourists but no more.</p> <p>I can only hope the council comes to its senses</p>		
254	DB2	Lifting of prohibited streets in Sidmouth	I write to register my objection to the extension of trading on the sea front except during Folk Festival Week. This would damage the special appeal to visitors of the seafront.	Response Noted No change to policy is proposed <i>Sidmouth Objection 208</i>	No
255	RM2	Lifting of prohibited streets in Sidmouth	<p>Thank you for the opportunity to comment on the Street Trading Policy Consultation 2023.</p> <p>My comment are:</p> <p><u>1. Prohibited Streets</u> I object to the proposal to change of currently designated Prohibited Streets (See Appendix 1) where street trading is at all times forbidden by law, to be designated as Consent Streets;</p> <p><u>2. Esplanade and Promenade</u> I object to the proposal to change of the designation esplanade and promenade from being a Consent Street during the Folk Festival, to a Consent Street being granted during a period annually from 1st May to 1st September. The proposed changes to Street Trading in these areas will impact the</p>	Response Noted No change to policy is proposed  <i>Sidmouth Objection 209</i>	No

page 131			<p>amenity, function and use of the shops, hotels and residents in the area and will potentially impact on the free flow of pedestrians, cars and delivery vehicles that need visit the town. It is also likely to result in Street Trade vehicles obstructing traffic flow, using the limited on-street parking spaces and could result in an increase in litter from traders or their customers.</p> <p>The roads within the Sidmouth are generally narrow, some are one way with limited width pavements, or with no pavements. When the town is busy, particularly in holiday periods pedestrians often walk in the roadway.</p> <p>If Streets are formally closed for specific events, such as Street Parties, Markets, Folk Festival and other events there may be some justification to permit Street Trading in limited areas on those days, or part of day.</p> <p>Any Street Trading consents issued in East Devon should:</p> <ul style="list-style-type: none"> <li>i) require vendors to switching from using single-use plastic and polystyrene to more sustainable food packaging, drinks containers and bags,</li> <li>ii) ban the selling, use and distribution of single plastic products,</li> <li>iii) ban the settling of balloons, sky lanterns, disposal bbq, and e-cigarettes or other products likely to impact on the result in litter or cause damage to the environment</li> </ul> <p>Such initiatives are also being proposed in Oxford see: <a href="https://oxfordshireguardian.co.uk/oxford-city-council-to-ban-single-use-plastics-for-street-traders/">https://oxfordshireguardian.co.uk/oxford-city-council-to-ban-single-use-plastics-for-street-traders/</a></p>		
256	PG1	Lifting of prohibited streets in Sidmouth	<p>I gather that the recent proposals would allow street trading all over Sidmouth in the summer, including the beach and 30 other streets. Sidmouth is a lovely, successful town with many small shops and businesses, which is becoming a rarity in these times. Surely this would attract out of town traders, threatening existing businesses and making the narrow streets too congested to get around. Litter would also be a problem. I also gather that the town council would have no say in what was allowed.</p> <p>I was born in Sidmouth and return there every summer, the council where I live, in Bath, are very busy destroying small businesses and driving away shoppers and tourists, so I hope this is not an attempt to achieve the same end by a different means! I cannot see why it would be suggested at all. It would certainly put me off returning.</p> <p>Please, I beg you to reconsider</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 210</i></p>	No
257	SS1	Lifting of	I do not think street traders will be of benefit to Sidmouth. Save for the very	Response Noted	No

		prohibited streets in Sidmouth	popular stalls along The Esplanade during Folk Week, any others would surely be a source of restriction and an immense refuse problem.	No change to policy is proposed  <i>Sidmouth Objection 211</i>	
258	PJL1	Lifting of prohibited streets in Sidmouth	<p><u>Fortfield Terrace</u> We write to express our concern at the proposals to change the status of Fortfield Terrace in Sidmouth from a 'Prohibited Street' (where street trading is at all times forbidden by law) to a 'Consent Street.' Fortfield Terrace is private and a no-through Road, leading only to our residences and the Cricket &amp; Tennis Club at the far end. The most attractive time of year for street trading is of course high season, when the Terrace is an incredibly busy public right of way offering access for pedestrians – including many children – and vehicles to homes and the Fortfield club facilities. It's impossible to imagine where street trader stalls would be able to set up except in the existing parking bays, of which there are not enough as it is to meet the needs of residents and Club members. We would have serious safety concerns over the changes as proposed, and will resist them vigorously.</p> <p><u>The Promenade (Beach)</u> We also oppose the change in designation to this part of Sidmouth. Part of the town's charm is precisely the lack of change over the years, and the preservation of Sidmouth's unique feel, without the encroachment of so many of the features which, if introduced, would make the town like so many others, and thus reduce its appeal, both for residents and visitors.</p> <p><u>General</u> One of the delightful things about Sidmouth is its eclectic mix of independent shops and food outlets. Their survival is vital to the town retaining its charm. We are concerned about the potential threat to our shops and cafes from these proposals. We hope that the consultation will result in a decision not to introduce these changes. We assume the consultation results will be made public. With grateful thanks and all good wishes</p>	Response Noted No change to policy is proposed <i>Sidmouth Objection 212</i>	No
259	MH1	Lifting of prohibited streets in Sidmouth	<p>I would like to express my support for what was quoted in the Sidmouth Herald as being the comments of Councillor Chris Lockyear on the EDDC proposal re Street trading licences in Sidmouth. I agree with what he said. I am not against the idea of street trading, but I think you need to be very</p>	Response Noted No change to policy is proposed	No

			<p>careful about the choice of Consent streets. In the summer months, Old Fore St for example is always full of visitors, along with the residents out shopping etc, and we have seen that when a queue forms outside the fish and chip shop (the White Horse) a jam of people forms very quickly. Among the crowds are families with young children and also some quite elderly Sidmouth residents. I worry that if there were even one van selling food, with people queuing, there would be congestion that made for an unpleasant experience for these people. Likewise, the experience of strolling along the Esplanade is pleasant precisely because one does not have to negotiate past lines of people queueing. On the other hand the Ham does provide a suitable space where food vans could park, and I understand that the seating area down by the river is to be revitalised, making it a nice place to sit and eat.</p> <p>To sum up, I think that any decisions about which streets are to be made available for street trading should be made in consultation with Sidmouth Council, because they like the other residents, are people who use those streets as part of their everyday lives.</p>	<i>Sidmouth Objection 213</i>	
260 Page 133	FB1	Lifting of prohibited streets in Sidmouth	<p>I am emailing to express my concerns regarding the proposed extension of street trading in Sidmouth town centre, the esplanade and surrounding 'consent streets'. As a resident in Millford Road (no13), a named 'consent street', I am particularly concerned as many of the roads, including Millford Road, are totally unsuitable for parked trading vans.</p> <p>As a regular litter collector around Sidmouth I feel that an increase in street trading will only add to the amount and cause unnecessary problems. Folk Week alone results in overflowing bins, litter in the gutters, on the beach, parks and an increase in trading will only add to this problem over a longer period. I would urge the EDDC not to introduce the proposed change.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 214</i></p>	No
261	JC5	Lifting of prohibited streets in Sidmouth	<p>I would like it noted that I am against the street trading proposals for Sidmouth. In my experience where I previously lived in West Sussex when ever on street trading took place the local traders lost out , some of these were severely effected as some of the stalls were selling g exactly the same produwithout the same overheads.</p> <p>These street traders are not required in a small place like Sidmouth.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 215</i></p>	No
262	GGG1	Lifting of prohibited	<p>We fully support the Sidmouth Chamber of Commerce view that the EDDC proposals on Consent Streets should be rejected.</p>	<p>Response Noted No change to policy is</p>	No

		streets in Sidmouth	<p>The economic situation is difficult enough for the town traders who pay business rates and they should not have to face competition from those who only have to pay a minimal fee to trade from the roadside.</p> <p>Additionally, the streets in Sidmouth town are generally narrow and carry considerable foot and powered traffic particularly in the summer months making them unsuitable for street trading.</p> <p>It's EDDC's role to support our permanent traders for the benefit of residents and visitors and not undermine them.</p> <p>The current rules on Consent Streets should be the maximum allowed by EDDC</p>	<p>proposed</p> <p><i>Sidmouth Objection 216</i></p>	
263	RB1	Lifting of prohibited streets in Sidmouth	<p>I am writing to express my concerns over this new policy.</p> <p>!) I feel that the prom is crowded enough especially during the holiday season and having traders there will be a nuisance and could put people off walking along it.</p> <p>2) Many of our streets are narrow with hardly enough room on the pavement to pass each other, trading there would be terribly inconvenient. If the stalls were on the road that would reduce the access for cars and vans, traffic is already tight.</p> <p>3) Likewise the market area gets very congested.</p> <p>4) Many shops owners may have concerns about possible loss of business.</p> <p>5) The appeal of Sidmouth is that is it is pleasant place to visit and relax rather than battling ones way along the front or through the town centre.</p> <p>6) Who these stall would appeal to is difficult to imagine. The locals are not into holiday tatty merchandise and as many of our visitors are older it is likely neither are they interested in it. Also often street stalls holders are fairly pushy and can be annoying.</p> <p>7) Once things are in operation it can be very difficult to get rid of them even if they are not popular or detrimental to the town.</p> <p>I hope you take mine and others views into consideration and hopefully reconsider this proposed policy change.</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 217</i></p>	No
264	TH1	Lifting of prohibited streets in Sidmouth	<p>I am writing to strongly object to the above proposal because:</p> <p>- street traders will have an unwelcome, unsightly and detrimental effect by cluttering up the peaceful, relaxing open space and seafront environment of the Sidmouth Esplanade and beach area currently annoyed by residents and visitors;</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 218</i></p>	No

			<ul style="list-style-type: none"> <li>- of the risk of increased litter;</li> <li>- it is an unnecessary commercialisation of this popular pedestrian visiting area because there are already trading facilities which are made available such as at the Ham and Kennaway House;</li> <li>- the risks arising out of street trader vehicles and stalls hampering access for emergency services attending incidents at the Esplanade area; and,</li> <li>- street trading will also place an unfair additional burden on existing town centre businesses struggling with ongoing overheads throughout the year.</li> </ul>		
265	LD1	Lifting of prohibited streets in Sidmouth	<p>I would like to register my opposition to the proposal for the Consent Street Status affecting many of the streets around Sidmouth Town. As a local resident who is unable to park outside their own house and especially during folk week cannot park even on local roads; I would hugely oppose any measures that would further reduce parking for local residents.</p> <p>I would also be unhappy that local businesses who already pay handsomely in terms of business rates will be disproportionately affected by these plans. They would potentially lose custom and at a time when our high street is seeing mass closures this is an untenable situation.</p> <p>I would also like to register my displeasure at how this matter has been conducted and feel that not enough has been done to highlight these plans to local residents.</p> <p>I sincerely hope you take into consideration the opposition to these plans and understand that they come from a place of wanting to safeguard the very businesses that make Sidmouth a tourist destination.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 219</i></p>	No
266	AB1	Lifting of prohibited streets in Sidmouth	<p>I'd like to register my objection to the proposal for street traders having consent to trade on many more roads in Sidmouth.</p> <p>I am of the same opinion as Sidmouth Chamber of Commerce, in that the current arrangements in the Ham and Kennaway are complimentary to Sidmouth, just as they are.</p> <p>I believe residential roads, for example Glen Road and Manor Road are unsuitable for street traders.</p> <p>In the town centre, for example Old Fore Street and Fore Street, street traders would restrict access for emergency vehicles, disability vehicles, pushchairs,</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 220</i></p>	No

<p>prams and pedestrians in general.</p> <p>Deliveries to businesses can not realistically be expected to deliver before 10am and after 5pm. They have many deliveries each day and it is not always possible to go to Sidmouth first or last! Courier companies delivering to businesses and residents have to follow routes and cannot be expected to avoid Sidmouth during certain hours. Street traders would block these roads.</p> <p>The proposal says, “consents should not be granted when there already exists sufficient retail outlets in the area”. Sidmouth enjoys many independent businesses including cards, artworks, jewellery, gemstones, handbags, scarfs, flowers, cheeses, fishmongers, delicatessens, toys, cookware, hardware, clothes, shoes, gifts, perfume, stationery, computer goods, pottery, beads, books, glasses and much more. The proposal says no to “conflict with other like trading outlets”.</p> <p>As the town is relatively small any street trader would be near all Sidmouth retail outlets.</p> <p>There are numerous food and drink outlets in Sidmouth. Also at least three more outlets are due to open soon. Any street traders, particularly food and drink, cherry picking summer dates, create “unfair advantage”, something the proposal doesn’t wish to do.</p> <p>It is well known that Folk week brings crowds to Sidmouth. However with 29 years of experience trading in Old Fore Street, I can reveal that despite high footfall, Folk week has all too often proven to be the quietest trading week in August. It would be fair to surmise this is due to street traders.</p> <p>Narrow pavements, narrow roads or both, create little access for pedestrians and “trading consent should not be granted where there is insufficient space”.</p> <p>If the proposal to increase the number of consent roads is in order to increase the footfall, then where is the plan for increased parking facilities? There are already visitors leaving town due to lack of parking facilities.</p> <p>Street traders themselves would take up parking with vehicles they work from, or have brought their stock in. Any extra generated footfall would further exasperate Sidmouth’s current parking problems. Maybe instead of putting</p>		
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			<p>time and energy in to creating street trading within Sidmouth, it would be better to spend time and energy creating answers to the on going lack of parking!</p> <p>If I was paying extra to stay in a sea view hotel room I would be so disappointed to open the curtains to the view of the back of a street trader's stall. It has to be recognised that street traders on the sea front would not be at all attractive from our wonderful Sidmouth hotels.</p> <p>Folk week is an exception ... May to September is a whole summer we would lose the freedom of a clear promenade and esplanade, something so very many come to Sidmouth to enjoy.</p> <p>Gazebos block views and may well limit viewing retail outlets if they are set up in town centre streets. For example street traders down the centre, or even on one side of a road, funnels pedestrians on one side or the other, leading away from some shops.</p> <p>No retail businesses want to have street traders outside their premises. Shop windows are the most important part of Sidmouth businesses. Any diminished views of window displays would be detrimental to trade.</p> <p>For all the reasons mentioned above Sidmouth cannot go forward with proposals to change the town in to street trading consent roads.</p> <p>Please keep Sidmouth the beautiful town that so many visitors return to year after year.</p>		
267	KH1	Lifting of prohibited streets in Sidmouth	<p>The overview in the draft Street Trading Policy document 2023 section 1.5 states that “<i>This policy supports a street trading experience that is diverse, vibrant and adds to the social and cultural fabric of East Devon that maintains, protects and enhances our environment. The policy aims to ensure that it meets the needs of traders, residents, businesses and visitors to East Devon</i>”</p> <p>As far as I can see, the proposals only support the needs of out of town traders descending on the region during peak season. These traders bring unfair competition for our established traders who pay rates, have to meet high environmental standards, and are part of our community. Section 6.21 says traders ‘may be’ inspected, but we all understand that EDDC will not have sufficient staff to enforce licences, public liability insurance validity, environmental standards, previous conviction of temporary staff, etc. nor to</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 221</i></p>	No

			<p>prevent abuse of the 'open street' policy that would be the inevitable result if these proposals are accepted.</p> <p>The current arrangements in Sidmouth only allow for street trading on the esplanade during the folk festive, i.e. at a time when there is a peak influx of visitor numbers that requires additional trading to supplement the capacity provided by existing 'brick and mortar' shops and caterers. Allowing the proposed extension of both duration and locations certainly will not support the needs of residents or businesses of Sidmouth, the latter who rely on their summer incomes to survive in what are increasingly difficult economic conditions. It would be a disaster for the town if these businesses were lost and landlords were left with empty unlet properties; this would destroy rather than enhance the economic health of the town, and risk destroying the unique charm of Sidmouth that attracts so many, to be replaced by a 'bucket and spade' destination focussed on that brief summer season and otherwise desolate during the off season like so many coastal communities.</p> <p>The majority of the proposed new consent streets are single lane, already unsuitable for modern traffic and pedestrians, so where does the council propose to safely locate stalls or vans used by the proposed traders? I fail to see how the majority of the proposed consent streets would pass the criteria noted in the 'Site 3 – Site Assessment' and I note the town council's recommendation that only five consent streets are suitable, with these only allowing trading a few times a year.</p> <p>I am strongly opposed to the EDDC's proposal for Sidmouth and would rather reject the consultation outright; however, if the status quo is not possible, I might be prepared to endorse the town council's recommendation to seek flexibility allowing limited street trading for a small number of streets and events, i.e. during peak visitor influxes such as the existing folk festival or extended to events such as the Air show.</p> <p>As a resident attracted to Sidmouth by its unique appeal, with family and friends employed in local hospitality, I oppose the proposals and urge the EDDC to do what is necessary to maintain what is cherished here.</p>		
268	MS2	Lifting of prohibited streets in Sidmouth	<p>To whom it may concern! - I am finding it difficult to understand that with all the shops struggling so , just to keep going , that this subject is even being thought about.</p> <p>Coach parties and other visitors , visit Sidmouth because ' it is what it is ' They are not coming to put up with agro around street trading sites. Street traders</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 222</i></p>	No

,who will obviously be taking desperately needed customers away from helping shop owners to have the chance of being able to continue in business and keep the town welcoming and alive. There are already enough eating facilities in town. At least in these ,any litter will be contained. There are about 10 charity shops so the town is not short of clothes and bric a brac either. And how delightful it will be to sit on the beach and find yourselves sitting on or beside litter hidden under the stones! I remember there was a young girl walking barefoot carefully back up the beach over the stones and she suddenly started screaming. She had trodden on a still hot barbecue tin hidden under a few stones.

Sidmouth surely isn't really a large enough town to accommodate or need street trading. The roads are too narrow and the pavements even worse. Pedestrians often unthinkingly step into the road without looking so they can overtake or pass people standing in groups talking. Not an option for those in wheelchairs or having to use walking sticks.

Trying to cross the esplanade when the town is busy causes traffic jams. I was in Sidmouth when the Fortfield Hotel was burnt down (2011?). The town was gridlocked for some time. All roads in and out blocked with vehicles.

Sidmouth, fortunately wasn't designed to become a seaside town with game arcades , dodgem cars , stalls selling 'kiss me quick' hats and candy floss etc! It , again ,fortunately has more decorum than that!! ( I do realise these are not street traders ! Just an observers viewpoint.)

I haven't even mentioned other aspects I have heard being questioned -hygiene ?

litter? - parking? - pickpockets and even more the shoplifting which I understand is already increasingly very bad these days . Is there no way shopkeepers can be helped?

There is also the likelihood that if town becomes unpleasant because of these street traders , people , especially the elderly ,might not go into town very often

and the buses will then have less passengers and the elderly will get depressed and feel like they are in lockdown again and may compose meaningful letters to send to the papers .

Please do not spoil Sidmouth and other towns. What would be more appropriate would be for you to encourage the Barclay Banking Pods and anything similar, to set up in Sidmouth and elsewhere. Not everyone has on line banking ,especially the elderly who also very often do not drive and life is getting very difficult for these people.

			The End!		
269	GEW1	Lifting of prohibited streets in Sidmouth	We are residents in Lower Sidmouth and are appalled by the current proposal to encourage street trading in this area. With respect it is an insult to the existing, rate paying shops and cafes that such an idea is even suggested. To be frank there is little enough space in the zone anyway; and street trading would create additional obstacles for those with mobility issues, partial sight or blind. It would take away from the town and give nothing back.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 223</i>	No
270	VR1	Lifting of prohibited streets in Sidmouth	Following your request for public response, I would be extremely concerned regarding the recommendations. We avoid the promenade when the traders are there besides the health and safety issues, the quality and sources of many of the products is questionable. When I travel around the country I realise that Sidmouth is still doing well maintaining its 'high street', it could be disastrous for our loyal traders. Some of the roads suggested for this are ludicrous with no regard to safety. Some relaxation in the Market Square for a 'Farmer's Market' could be a good idea, but please don't destroy our town.	Response Noted No change to policy is proposed  <i>Sidmouth Objection 224</i>	No
271	JS7	Lifting of prohibited streets in Sidmouth	I strongly object to street trading in sidmouth. During Folk week many traders park on the double yellow lines and no loading markings on The Esplanade all day blocking the road for Sidmouth Lifeboat, emergency services, food deliveries etc. I am sure the hotel guests, residents and business customers do not wish to look out onto stalls and gazebos on the promenade all summer instead of the stunning sea views. I have mobility problems and when the town streets are busy as the pavements are narrow I often have to walk in the road and also to get past the tables and chairs the cafes put out. Some take up the whole pavement. The problem is added to with all of the metal advertising boards and flags on the pavement. Stalls on the pavements will add to the problem. Surely pavements are for the safety of pedestrians. The problem is a lot worse for disabled people with with wheelchairs and mobility scooters. I hope you will take these comments into consideration	Response Noted No change to policy is proposed  <i>Sidmouth Objection 225</i>	No
272	CW2	Lifting of	I totally disagree with extending the street traders policy.	Response Noted	No

		prohibited streets in Sidmouth	<p>One of the reasons visitors come to Sidmouth is because we don't have all the stalls and tat that some other seaside towns have. It is bad enough having it along the esplanade during the folk festival, it makes Sidmouth look a mess, visitors complain they can't see the view because of the stalls and it makes walking along the esplanade more difficult.</p> <p>Many people in Sidford, where I live, do not go into Sidmouth during the folk festival as it is difficult to park, difficult to walk around and difficult to shop in local shops and people certainly don't want the sort of things being sold on stalls and this would be the same if stalls are all around the town at other times.</p> <p>To consider extending this to roads such as Glen Rd, Manor Rd etc is absolute madness and will NOT encourage people to come to Sidmouth. EDDC need to be encouraging businesses with decent incentives to take up the empty shops in Sidmouth so that they are permanent and available all the year round to visitors and locals.</p>	<p>No change to policy is proposed</p> <p><i>Sidmouth Objection 226</i></p>	
273 page 141	CW3	Lifting of prohibited streets in Sidmouth	<p>I object to the Council's recommendation for Street Trading in Sidmouth and agree with the stance taken by The Sidmouth Town Council and Chamber of Commerce.</p> <p>The streets and pavements on the whole are too narrow. Manor Road already has a large number of huge coaches and lorries regularly causing problems.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 227</i></p>	No
274	JL3	Lifting of prohibited streets in Sidmouth	<p>This scenario is on the table again and hopefully it will be dealt with in the same way as it was a few years ago.</p> <p>The reasons for not having Street Trading at any other time than the Folk Festival week were well documented, it is a shame to waste more time of the Council in having a further consultation. However, it is unclear in the articles published just how many licences will be issued on a daily or 6 monthly basis and whether the traders would be able to come into Sidmouth as they please. More information on this point would be required.</p> <p>My objection is not all to do with the competition to the already struggling shop owners in Sidmouth:</p> <p>To start with there is access to the town - parking at the best of times is abysmal for residents and visitors, with an influx of vans, lorries and extra cars which will undoubtedly require what will be termed by the traders as essential parking as near to their trading spot that they can get to unload and surround their vehicles with tape and cones as they do in Honiton which is a shameful</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 228</i></p>	No

shambles thanks to Devon County and seemingly unchallenged by EDDC.  
 Additionally, generators and associated cabling will be used for the vehicles used for hot food. Will this be taken into consideration as a noise and nuisance factor and will individual Risk Assessments be made each time to ensure safety.

These additional vehicles will clog up the already narrow streets that are being suggested for trading permits. None of the suggested streets are satisfactory for traders. EDDC must also do much more to encourage DC to improve the road surfaces into Sidmouth, some access roads are very dangerous with deep pot holes and rugged surfaces. All of the extra traffic from Street Traders will also exacerbate the damage already in place.

Emergency access to the town. In a town full of elderly residents hardly a day goes by where there is not a call for assistance and not just elderly. Street Trading will encourage pedestrians to wander into the road to get round obstructions and traders alike, I would like to think that EDDC should know that Sidmouth is not the place for all the extra congestion, the Folk Festival week is tolerable but for 6 months of the year it will be turned into a town that can barely cater for it's own visitors let alone extra traders.

A farmers market perhaps might be acceptable say on one day on a monthly basis, but spare the shop keepers in Sidmouth the embarrassment of losing out for 6 months of the year. This would seem like a punch on the nose, we already have a substantial turnover of empty shops, why does EDDC wish to consider making things worse.

Extra trading also means extra WC facilities, EDDC already falls down on the Public Toilets question. Just where will the Street Traders go?. The Shop keepers in Sidmouth are not obliged to assist in affording use of their washrooms and why would they when they are being pushed by competition? Will Environmental Health ensure that all of the Street Traders have the correct Hygiene Certificates required where the sale of food is concerned? If there are to be mobile food vans these are renowned for a lack of hygiene and are their vehicles to be environmentally friendly?

Will Licensing make regular visits to check Licences are not being transferred from one trader to another? This does happen quite frequently in other towns. If not policed in the correct manner which means a total dedication by the Licensing team, there will always be a chance to flaunt the regulations. Having experienced dealings with Street Traders (not just in Sidmouth) they will do whatever they wish to gain an advantage unless completely kept on a tight reign. This idea may bring extra money into the Council by charging for the

			<p>licence to trade, but I would suggest it should be at a price that would be inline with the business rates, rents and outgoings that our local shopkeepers have to endure.</p> <p>Trading anywhere is still experiencing difficult times, Brexit has caused much of the problem and costs are still increasing in certain areas. COVID added to the problem and just when we thought that things might start to improve many countries not just the UK have had supplies of food from Ukraine disrupted. All of this now coupled with drought and floods in equal measure makes it such a folly idea to allow 6 months of Street Trading especially in a town not easily equipped to cope under normal summer influx let alone with additional traders that may just be the last nail in the coffin of the ever struggling shop keepers.</p> <p>Please accept this as my objection to any additional Street Trading in Sidmouth</p>		
275	CB4	Lifting of prohibited streets in Sidmouth	<p>I do not think that extending street trading in the Sidmouth area is a good idea and I am therefore against it.</p> <p>My experience of street trading in Sidmouth is limited to that of the stalls that appear on the promenade during the Sidmouth folk festival. I can remember a time when the whole of this area was available for groups or individuals to play their instruments or dance to entertain the passers-by. If my memory serves me correctly the stalls were given an area near the arena up Station Road away from the seafront. I don't think that this change is an improvement, in fact just the opposite. The proposal to allow streets trading on the prom for an even longer period I cannot support. Extending street trading to other roads in Sidmouth does not seem to take into consideration how much disruption there maybe to public walkways and traffic flow in the relatively narrow streets, especially during times when Sidmouth becomes a popular tourist destination. I suspect, although I do not have any evidence to support it, that the majority of street traders will come from outside the Sidmouth area and this maybe to the detriment of the existing businesses within Sidmouth.</p> <p>I think I should point out that I have visited Sidmouth since the 1980s and that three years ago I became a resident.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 229</i></p>	No
276	RB2	Lifting of prohibited streets in Sidmouth	<p>The current position of bricks-and-mortar shops is quite precarious nationwide at this time. Even when things hopefully improve, all traders are under the pressure from online selling. Sidmouth has somehow managed to hold onto a department store, but for how much longer? The last butcher closed. We have</p>	<p>Response Noted No change to policy is proposed</p>	No

an excellent fruit & veg shop in Winchesters, but these year-round assets cannot be taken for granted.

I think there is considerable risk to the futures of the many businesses, which are open in Sidmouth for 50+ weeks of the year, if street traders are able to take a significant slice of the available trade in the high-season but move off or shut down their overheads in the low-season. Our shops pay their tax all year round and will be left with the same bills but less trade.

We have a very good diversity of small independent shops and some common high-street brands. I would hate to see some of those businesses fold, just because this deregulation enabled EDDC to open up a summer-time revenue stream from some "here today and gone tomorrow" traders.

There's a sensible middle-way where some limited street trading plugs gaps and adds capacity in high season. I would align my opinion with the town council's. We need to ensure that Sidmouth continues to serve residents and visitors alike, from the summer to the winter. The proposal from EDDC appears far-ranging and serving a short-term gain at the expense of a long term loss. Additionally I have concerns about access. The idea of street trading in several of the narrow streets mentioned seems implausible without effectively closing the street. I will only address my street, Chapel Street and Bedford Square: how am I to come and go, receive deliveries? It is difficult enough with double-yellow lines outside my property (very reasonably, there is no room!). Now the additional problem is that stalls may cause blockages and so vehicles will need to reverse back along roads having delivered. it sounds like a recipe for disastrous traffic flow problems! I've witnessed the occasional collision in the area outside Fields, at the junction of Old Fore St. and Dove Lane where elderly drivers have "got into difficulty" manoeuvring in an area of not very clearly defined traffic flow and lots of temporary and permanent obstacles. Too much additional "clutter" could end up putting off the very people whose indexed linked pensions have been keeping the town afloat in these cash-strapped times.

I don't feel a pressing need to be able to buy wind-chimes, hot-dogs or hand-held wind-mills, but carefully managed expansion of services to serve the summer peaks (without taking away trade from the local shops) makes sense, as does themed occasional street events like a weekend street-food market, or a crafts fair. Any additional trading needs to be tied to an "event", not just becoming a continuum of competition when the conditions are fair and then having the convenience of shutting down out of season.

If EDDC wants that sort of thing to go on then they need to change how

*Sidmouth Objection 230*

			<p>business rates work for the bricks and mortar shops. Perhaps they too should pay for only 4 months of the year or pay according to their profit each month - otherwise EDDC are creating an uneven playing field to the detriment of Sidmouth as a 365/52 town.</p> <p>So finally my summary: The plan is excessive. Chapel Street and Bedford Square seem wholly unsuitable. My mother lived in Coburg Terrace for a number of years and I think she would have struggled to cope and been very frustrated at the thought of stalls in Coburg Road. The plan looks like a desperate move to obtain a little bit more cash though licensing, no matter the consequences. The Town Council seems to have a more fitting plan for what Sidmouth needs.</p>		
277	FT1	Lifting of prohibited streets in Sidmouth	<p>I am totally against Street Trading in Sidmouth, all year round. I am happy for this to take place during folk week and other special events, but in a limited way. Small independent businesses in our town, have been struggling to survive since lock done, this would be the final nail in the coffin, sadly, for some of them.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 231</i></p>	No
278	JS8	General	<p>I think this is a great idea for Sidmouth and it should also be set up in Exmouth as we need to improve the cultural provision of Exmouth.</p> <p>Take a look at the tobacco factory market in Bristol as an example...they rotate the stalls to keep it interesting but it has to be a regular event so everyone knows when it is on.</p> <p>Arts and craft stalls as well as food would be such a welcome attraction in Exmouth</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth and General Support 23</i></p>	No
279	AW3	Lifting of prohibited streets in Sidmouth	<p>As a permanent resident in Sidmouth for many years now I wish to state that I DO NOT APPROVE of the idea of making street trading a "happening" in Sidmouth at all, and DEFINITELY NOT in Fortfield Terrace; we have few enough parking spaces here as it is for the residents!</p> <p>Sidmouth is known for Folk Week and the market stalls that are part of it, and that's fine, it's one week of the year. Aside from that we need to keep the character and charm of the town which is what attracts people to return to it time and time again; also very importantly we need to consider and support our shop keepers who as we all know must be finding it very hard to make a living here nowadays. Street traders would make life so much harder for them!</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 232</i></p>	No

			<p>I honestly feel that street trading would drag Beautiful Sidmouth down, not enhance it, and would take away its uniqueness for which it is renowned.</p> <p>Further to my email below I failed to mention that the raised terrace surrounding the houses at Fortfield Terrace obviously would not be available for street trading either as it is private property.</p>		
280	DM3	Lifting of prohibited streets in Sidmouth	<p>I wish to record my opposition to the proposal to lift restrictions on street trading and food vans in Sidmouth. Furthermore, the list of 'prohibited streets' should remain unchanged.</p> <p>Specifically in relation to the Esplanade, the foreshore, and the Ham turning-circle, the proposals risk greatly diminishing the attractiveness of Sidmouth to both residents and visitors. The essence of Sidmouth is the uniqueness of the seafront: damage that and you 'kill the goose that lays the golden egg'.</p> <p>Even on a practical level the proposals should be rejected for a number of reasons including:</p> <p>Unfair Competition One of the more obvious reasons is unfair competition. In an era when shops are closing due to competition from the internet, out of town malls, etc, why on earth would the Council hasten further closures by consenting to street-trading which has minimal overheads and pays nothing back to the community other than a nominal permit fee?</p> <p>Safety The Esplanade is already a very busy thoroughfare. Throughout the year it is crowded with walkers, children on bikes and scooters, multitudes of dog-walkers, disabled vehicles, etc. Stalls and their customers significantly reduce the access width as witnessed during Folk Week. Increased congestion reduces safety, especially for the elderly who represent a large proportion of walkers in Sidmouth.</p> <p>Annoyance/Nuisance Noise, food smells, unsightly appearance will all detract from the distinctive splendour of the Sidmouth seafront. (A good example of the negative impact of allowing more food vans is the one in the grounds of Kennaway House: apart from its incongruous appearance, the cooking food smells detract from appreciation of that historical part of Sidmouth. It is an especially illogical addition when there are already 2 eateries in Church St).</p> <p>Breaching of Traffic Regulations Traders do not adhere to traffic regulations as can be witnessed during Folk Week when vans are illegally parked (with impunity) on the Esplanade. This causes even more traffic queuing especially close to the Zebra Crossing with reduced safety for crossing pedestrians and</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 233</i></p>	No

			<p>greater air pollution due to fumes from stationary vehicles.</p> <p>Noise/Air Pollution Added noise and air pollution from stationary vehicles with engines running and from traders' generators.</p> <p>Litter and Waste Already there are reports of rats on the foreshore; an increase in food retailing on the Esplanade and the foreshore will inevitably add to that problem.</p> <p>Some of the foreseeable problems that will accompany more street trading in Sidmouth are already raised in the Council's Draft Document (Street Trading Policy Draft 2023, Version 1) but in reality it is highly unlikely that the Council will be allocating funds to adequately police the areas that would be affected. Clearly the sensible approach is to avoid the problem in the first instance by not increasing the amount of street trading.</p> <p>Consequently I ask that the Council reject proposals to lift the current restrictions on street-trading and that the list of 'prohibited streets' should remain unchanged.</p>		
281 page 147	MM2	Lifting of prohibited streets in Sidmouth	<p>As a Sidmouth resident I am writing to register my opposition to the proposed additional licensing of street traders. This will only take trade away from established businesses which pay rent and rates and offer employment all year round. As you're aware, businesses have had a very difficult past few years and really need to be supported rather than have their livelihood further threatened by the proposed measures.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 234</i></p>	No
282	AM2	Lifting of prohibited streets in Sidmouth	<p>I wish to record my opposition to the proposal to lift restrictions on street trading and food vans in Sidmouth. Furthermore, the list of 'prohibited streets' should remain unchanged.</p> <p>Specifically in relation to the Esplanade, the foreshore, and the Ham turning-circle, the proposals risk greatly diminishing the attractiveness of Sidmouth to both residents and visitors. The essence of Sidmouth is the uniqueness of the seafront: damage that and you 'kill the goose that lays the golden egg'.</p> <p>Even on a practical level the proposals should be rejected for a number of reasons including:</p> <p>Unfair Competition One of the more obvious reasons is unfair competition. In an era when shops are closing due to competition from the internet, out of town malls, etc, why on earth would the Council hasten further closures by consenting to street-trading which has minimal overheads and pays nothing back to the community other than a nominal permit fee?</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 235</i></p>	No

			<p>Safety The Esplanade is already a very busy thoroughfare. Throughout the year it is crowded with walkers, children on bikes and scooters, multitudes of dog-walkers, disabled vehicles, etc. Stalls and their customers significantly reduce the access width as witnessed during Folk Week. Increased congestion reduces safety, especially for the elderly who represent a large proportion of walkers in Sidmouth.</p> <p>Annoyance/Nuisance Noise, food smells, unsightly appearance will all detract from the distinctive splendour of the Sidmouth seafront. (A good example of the negative impact of allowing more food vans is the one in the grounds of Kennaway House: apart from its incongruous appearance, the cooking food smells detract from appreciation of that historical part of Sidmouth. It is an especially illogical addition when there are already 2 eateries in Church St).</p> <p>Breaching of Traffic Regulations Traders do not adhere to traffic regulations as can be witnessed during Folk Week when vans are illegally parked (with impunity) on the Esplanade. This causes even more traffic queuing especially close to the Zebra Crossing with reduced safety for crossing pedestrians and greater air pollution due to fumes from stationary vehicles.</p> <p>Noise/Air Pollution Added noise and air pollution from stationary vehicles with engines running and from traders' generators.</p> <p>Litter and Waste Already there are reports of rats on the foreshore; an increase in food retailing on the Esplanade and the foreshore will inevitably add to that problem.</p> <p>Some of the foreseeable problems that will accompany more street trading in Sidmouth are already raised in the Council's Draft Document (Street Trading Policy Draft 2023, Version 1) but in reality it is highly unlikely that the Council will be allocating funds to adequately police the areas that would be affected. Clearly the sensible approach is to avoid the problem in the first instance by not increasing the amount of street trading.</p> <p>Consequently I ask that the Council reject proposals to lift the current restrictions on street-trading and that the list of 'prohibited streets' should remain unchanged.</p>		
283	JKG1	Lifting of prohibited streets in Sidmouth	<p>Please accept this email as a response to the consultation on allowing street trading in Sidmouth.</p> <p>Sidmouth is unique this is why people come to visit and stay. We have no need for street trading other than that in folk week which is part of its charm. You say that street traders will provide goods not available elsewhere in the</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 236</i></p>	No

			<p>town. We beg to differ.  Established businesses pay business rates. What levy will be placed on street traders apart from the administration charge?  If only a number of the roads projected to be affected by this proposal are used where does the traffic go?  It seems strange that this consultation is being carried out in the winter months. Surely the tourists who flock to Sidmouth year on year during the summer should have a say.</p>		
284	LC3	Lifting of prohibited streets in Sidmouth	<p>I am writing as one of the Sidmouth based festival organisers on behalf of <b>ORGANISATIONS NAME REMOVED</b> who produce <b>ORGANISATIONS NAME REMOVED</b>.</p> <p>I would like to register our support for Sidmouth Town Council's position regarding the Street Trading consultation. The view taken by the council is balanced and specifically references those streets which would sensibly be able to accommodate street trading based on the criteria set out by the town council.</p> <p>There have in recent years been plenty of evidence-based studies promoting a mixed use, social as well as commercial approach to town centres and high streets. The two references below provide useful insight into the criteria we could be adopting and checking against how our local area is supported to evolve and change. The reliance on online shopping and decrease in foot fall for a variety of reasons means that new ways to bring footfall into Sidmouth is imperative for the health of all businesses.</p> <p>Consent streets which are carefully managed can help with this to attract innovation, sustainable business practice idea, short/local supply chain exemplars and multi generational activities that bring people both local people and visitors to the town – thereby encouraging increased use of the high street shops, cafes and restaurants throughout the year. A balanced approach is therefore needed, it is complacent to think that no change to the current prohibited streets that Sidmouth currently has is in the best interests of the economy. It is a fixed inflexible view that lacks an open-minded approach to future proofing businesses that operate from premises and misses opportunities to anchor people who visit for events, festivals and markets for example. This could also provide opportunities for bricks and mortar traders to demonstrate their offer and bring them to their premises. It also overlooks the fact that in busy times it is important to give a good experience with their being</p>	<p>Response Noted  No change to policy is proposed</p> <p><i>Sidmouth Support 24</i></p> <p>See 13 - In line with STC approach</p>	No

			<p>plenty to offer especially in terms of food and drink and a night time economy, to help sustain business based in premises and to create repeat visitor behaviours.</p> <p>The following links provide insights and evidence of where and how we should in our view be focussing support for the local economy and the conditions needed to create opportunities to ensure footfall to the town. We believe these would be helpful to consider.</p> <p><u>25 'Vital and Viable' Priorities   High Streets Task Force</u>  <u>Reinventing the high street for Covid-19 recovery - Sustrans.org.uk</u></p> <p>As a provider of a local event free to the community – we are not reliant on traders as we are not a commercial model – we do have some traders based on the Ham which is a consent area, but we recognise that in a carefully curated manner and through collaboration there are benefits to ensuring the town's economy for all is resilient and able to thrive and that an opening up of some of the streets in Sidmouth (see the Town Council consultation response), that it will not result in a burger van on every corner but will ensure Sidmouth is able to adapt and respond to what more people are looking for in their town centres and that will attract visitors.</p> <p>Adaptation and change to what people are looking for – community open air cafes, cultural offers alongside sustainable and pleasant shopping and a chance to connect with people for their wellbeing is important and for these reasons, <b>ORGANISATIONS NAME REMOVED</b> supports the balanced view of Sidmouth Town Council in their response to this consultation, which if operated with the bespoke community criteria and clear checks and balances would be of benefit to Sidmouth and in particular would ensure a balanced approach which is not currently possible with the blanket protected streets restrictions does not afford such opportunities. This is not a contradictory position to also sharing the view that environmental sustainability and consideration of existing traders should be part of a well-managed process to ensure a nuanced approach.</p>		
285	C11	Lifting of prohibited streets in Sidmouth	<p>I WOULD LIKE TO PUT IN A FORMAL OBJECTION TO THE SUGGESTED PLANS TO CHANGE THE STREET LICENSING IN SIDMOUTH.</p> <p>I AM A BUSINESS OWNER IN SIDMOUTH AND I STRONGLY BELIEVE THAT HAVING STALLS ON THE PROPOSED STREETS AND SEAFRONT WOULD NOT ONLY AFFECT MY BUSINESS DETRIMENTALLY, BUT ALSO MANY OF THE SMALLER BUSINESS'S IN THE TOWN. I THINK THAT THE</p>	<p>Response Noted  No change to policy is proposed</p> <p><i>Sidmouth Objection 237</i></p>	No

page 139			<p>COUNCIL SHOULD ACTIVELY SUPPORT OUR SMALL BUSINESS'S THAT ARE ALREADY STRUGGLING IN THIS CURRENT CLIMATE. THERE ARE ALREADY A LOT OF EMPTY SHOPS SO TO BRING IN OUTSIDE TRADERS WHO DON'T HAVE TO PAY THE OVERHEADS THAT WE DO SEEMS TOTALLY UNFAIR. SURELY THE PRIORITY SHOULD BE TO FILL THESE EMPTY SHOPS WITH NOT MORE CAFES, BUT WITH PRODUCTS OF INTEREST TO VISITORS.</p> <p>ON A MORE PERSONAL NOTE I FEEL THAT THE ATTRACTION OF SIDMOUTH TO LOCALS AND VISITORS IS THE BEAUTIFUL SEAFRONT THAT IS UNSPOILED BY UNATTRACTIVE STALLS AND STREET TRADERS AND AS A LOCAL I WOULD BE FAR MORE INTERESTED IN BROWSING THE SMALL, QUIRKY LITTLE SHOPS. IF I WANTED TO VIEW STALLS SIMILAR TO THE FOLK WEEK STALLS I WOULD GO TO A CAR BOOT SALE.</p> <p>I CERTAINLY HOPE THESE PLANS WILL NOT GO AHEAD AS I FEAR THAT AS A RESULT WE WOULD HAVE MORE EMPTY SHOPS INCLUDING MINE <b>'NAME REMOVED'</b></p> <p>EVEN THOUGH WE HAVE BEEN VOTED BEST ICE CREAM IN THE SOUTH WEST .</p>		
286	RVH1	Lifting of prohibited streets in Sidmouth	<p>We wish to object most strongly to the EDDC's street trading propositions for Sidmouth.</p> <p>The narrow streets of the town and surroundings are busy in the summer and more congestion with street traders will cause complete gridlock. This often happens now along the sea front. During the festival week when street trading is allowed, traders park their vehicles in residential streets causing nuisance to those who live in those roads, or block spaces in the carparks which would normally be taken by tourists.</p> <p>Street traders tend to sell inferior goods compared to the high quality shops we have in Sidmouth. Local shopkeepers pay business rates all year around-it seems excessively selfish of the EDDC to try and promote temporary traders rather than supporting permanent businesses, many of which are struggling to survive. It would ultimately leading to empty shops.</p> <p>Traders on the beach at Port Royal will block any sailing /gig activities. Inevitably any rubbish from takeaways etc. will end up blowing into the sea. A clean beach is something which Sidmouth is proud of.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 238</i></p>	No

287	SV1	Lifting of prohibited streets in Sidmouth	<p>I am writing to strongly object to this proposal.</p> <p>There are multiple reasons why I think this is an unfair and poorly thought out idea but the main one being how it will destroy many existing businesses within Sidmouth. I don't understand how you expect these business, who pay council tax, support families, bring business to Sidmouth to survive and compete with multiple stalls coming from out of town and taking away their business. It's not ok.</p> <p>Sidmouth is a beautiful town and I don't understand why you would want to destroy the beauty of it by allowing these stalls.</p> <p>Times are hard enough for business owners without you doing something like this- where is your support for all these businesses that not only survived covid but continue to make Sidmouth a key attraction within Devon.</p> <p>Personally I feel there are NO benefits to this other than you will see more empty shops, family business will not be able to survive so by all means if you really want to turn Sidmouth into a tacky sea side town then crack on but I personally would rather it stayed classy, authentic with many family businesses.</p> <p>I really do hope someone has some sense and does not allow for these plans to go ahead.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 239</i></p>	No
288	SM3	Lifting of prohibited streets in Sidmouth	<p>Sidmouth Chamber of Commerce is strongly opposed to EDDC's proposals to turn 32 of Sidmouth's roads to 'Consent Street' status. This will allow street traders to sell goods and services almost anywhere in the town subject only to a licence from EDDC.</p> <p>At present only the Ham is a consent street, along with The Promenade during Folk Week. The Chamber thinks the current arrangements work well, and the right element of control over street trading is applied. The Chamber is very comfortable with the kind of street food and stalls that are currently offered from time to time at the Ham, and, for example, Kennaway House. We think this is the right balance going forward. There are numerous and very suitable locations where 'street trading' in Sidmouth can be conducted, and this seems to work well.</p> <p>The Chamber feels that allowing burger vans, ice cream salesmen, stalls selling craft items, bric-a-brac food and clothing throughout the town centre is likely to be a problem for a number of reasons:</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 240</i></p> <p>The timing and methodology of the consultation is detailed in the report to the Licensing &amp; Enforcement Committee.</p> <p>Under legislation, the determining body is the EDDC licensing authority</p>	No

1. It will be unfair competition for our established traders who pay rates, have to meet high environmental standards, and are part of our community. They provide a service throughout the year and are faced with unprecedented challenges. Many of the stalls, vans and trailers will be coming from outside the area, and will only appear at peak times in the summer to take our trade.
2. Past experience has shown that street trading greatly increases litter and pollution: ironically it is often local businesses who have to clean up the mess outside their shops.
3. Our road system, our listed buildings, our Conservation Areas, and our much-admired Esplanade and Beach, are simply not suitable.
4. Sole control of the 'consent street' system of licensing is vested in EDDC, so Sidmouth will have no say in what is allowed. EDDC is only offering 'consultation'.
5. The current system is flexible and working well, and there are plenty of suitable locations for 'street food' to be purveyed.
6. The 'Consent Street' system has been controversial in other East Devon towns. We seem to have few problems in Sidmouth whereas other towns are frequently in the news as a result of issues arising from street trading.

The Chamber is unhappy with the current description of the Consultation process on the EDDC website. This implies that the only change in Sidmouth is to the Esplanade ( we think they mean the Promenade ), where EDDC want to see street trading such as we have during Folk Week allowed throughout the summer. The EDDC press release does not mention that they also want stalls, vehicles and traders on the Beach in the summer, and in 30 other streets in and around Sidmouth town centre. You may also wish to look at the Sidmouth Community Pages which are awash with lots of comments against these proposals, we appreciate that you are able unable to take these into consideration but it shows you how many people in the community feel about the changes.

We think this is extremely misleading, and will undoubtedly distort responses to the Consultation, to the point of making it all but invalid. To confirm, Sidmouth Chamber of Commerce is strongly against these proposals. You may also wish to look at the Sidmouth Community Pages which are awash with lots of comments against these proposals, we appreciate

			that you are able unable to take these into consideration but it shows you how many people in the community feel about the changes		
289	PS3	Lifting of prohibited streets in Sidmouth	<p>Please can I seek assurance that <b>ORGANISATIONS NAME REMOVED</b> will be fully consulted regarding proposed street trading on Clifton Beach, Port Royal beach, access points to those beaches, and the highway to the east of the lifeboat station including the turning circle.</p> <p>I would also express some concern that we have not been contacted directly on this subject, and have instead been reliant on local media</p>	Response Noted as a question. No change to policy is proposed	No
290	DL2	Lifting of prohibited streets in Sidmouth	<p>I am responding to the draft policy on Street Trading as a resident of Coburg Terrace.</p> <p>I believe the proposals are too wide reaching covering a large number of streets including those in conservation areas. Festivals are a separate issue and bring revenue to the town as well as to traders licensed for those events. The council should be focusing on encouraging events that bring traders together such as Eats Boutique at Kennaway House and promoting and supporting a proper farmers' market either at Kennaway or even better in the Market Square. We are lagging behind places like Axminster which has a regular farmers' market in the Church Yard.</p> <p>The High Street has suffered over recent years with Covid lockdowns and restrictions and now the cost of living crisis. We have just lost Joules and Mc and Co is due to close. The energies of EDDC would be far better spent supporting the local shops and encouraging new start ups and challenging some of the high rents and lease catch alls that a number of landlords exploit to great advantage to themselves.</p> <p>Come up with a proper economic strategy which includes ways new businesses can open and younger entrepreneurs come to see Sidmouth as a place to begin new businesses themselves.</p> <p>We are in danger of being a retirement community with a regency heritage. Stuck in the past, stuck in our ways with little to offer younger families and a wide range of visitors. None of what you propose creates jobs or brings money through the doors of retailers and other shops and cafes who are her all the year round paying their rates and overheads</p> <p>I strongly object to the proposals.</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 241</i></p>	No
291	MH2	Lifting of	I only heard of this consultation today, Sunday 26 February 2023, the closing	Response Noted	No

		<p>prohibited streets in Sidmouth</p>	<p>day for comments. Short notice, plus recent cancer surgery affects this response</p> <p>This message has been blind copied to several neighbours in Fortfield Terrace, also to a Sidmouth Town Councillor. (GDPR compliance.)</p> <p>Visibly listed recipients of this message include Joe Whibley Chair of EDDC Licensing &amp; Enforcement Committee, also Sidmouth Town Council.</p> <p>Like our Town Council, I consider it inappropriate for EDDC to extend Street Trading to Sidmouth - apart from the current limited exemptions during Folk Week (or in specific locations, such as The Ham and/or the grounds of Kennaway House.</p> <p>Of course, if the Port Royal public toilets are closed, The Ham will no longer be a good choice for pop-up trading and eating/drinking opportunities!)</p> <p>The proposals for street trading within Sidmouth have no basis in NEED for:-</p> <ul style="list-style-type: none"> <li>• residents</li> <li>• visitors</li> <li>• existing businesses &amp; traders.</li> </ul> <p>Apart from the incoming NEW traders, with their limited overheads and probably far less scrutiny than fixed-base traders, the proposals for street trading within Sidmouth may well be to the detriment of existing:-</p> <ul style="list-style-type: none"> <li>• residents</li> <li>• visitors</li> <li>• existing businesses &amp; traders.</li> </ul> <p>There appears to be no rationale given for introducing street trading within the listed Sidmouth streets.</p> <p>Please define how street trading will benefit current traders? We've lost many of our shops already.</p> <p>We're already pretty long on eateries and coffee shops. Further street traders are not required for those! It's probable that street traders will emanate from outside rather than existing local suppliers. Hence likely loss of further valued Sidmouth shops.</p> <p>The town of Sidmouth is of national importance, with a valued and absolutely unique character. Sidmouth has amazing natural beauty, a celebrated Regency heritage, its own theatre and incredibly hard working volunteers e.g Sidmouth in Bloom. These examples of attractions bring many folk to our town. Turning Sidmouth into 'Anywhere-else-on-sea' risks alienating our valued visitors.</p> <p>Parking in Sidmouth is dire at present. Street Trading would make this worse. Litter is already a problem. Introduction of floating outlets can only exacerbate discarded items affecting our street scene.</p>	<p>No change to policy is proposed</p> <p><i>Sidmouth Objection 242</i></p>	
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			<p>Who assembled that list of roads where 'Consent' for street trading could be given? Many named roads are narrow and already congested with parked (and/or moving) cars. Many of those roads are in the Town Centre Conservation Area.</p> <p>Has pedestrian safety been considered, if seasonal street trading is to be introduced?</p> <p>Large parts of Sidmouth are within Conservation Areas. The special qualities of these designated areas should not be undermined by inappropriate and insensitive introductions.</p> <p>How is Street Trading thought to preserve and enhance the Conservation Areas?</p> <p>What about the National Planning Policy Framework and the requirement to protect (and if possible) enhance existing heritage?</p> <p>Fortfield Terrace is Grade II* Listed (as is Coburg Terrace.) These are unusually high ratings for residential properties. Fortfield Terrace is a 'vital component of the Sidmouth townscape.' Fortfield Terrace is described as 'impressive in scale and detail' and as 'majestic' in Sidmouth Conservation Area 1 documentation. Fortfield Terrace is a heritage asset of great significance. Street Trading in that location is unthinkable.</p> <p>How will Fortfield Terrace be improved by street trading? We already have easy access to the Summer Shop, the Fort Cafe, the Arches Beach Cafe etc. Refreshments, beach toys, ices all to hand. What else might we need to make our lives more 'vibrant'?</p> <p>What services, or requisites are so important that our wonderful environment in Fortfield Terrace could be blighted by street trading?</p> <p>Does street trading not impair the peaceful enjoyment of our own properties?</p> <p>The wide pavement of Fortfield Terrace is Grade II listed. That pavement is in the ownership of the different residential properties and can NOT be appropriated for street trading.</p> <p>What are the PUBLIC benefits of street trading which justify overriding the preservation of our wonderful and highly significant heritage in Fortfield Terrace?</p> <p>With more time &amp; energy this could be shorter and better expressed. However I think you get the gist! I am totally against a change to the street trading opportunities within Sidmouth.</p>		
291	JR1	General	Thank you for including Axminster Chamber in the street trading consultation.	Response Noted – general	No

			<p>It is good to hear that the Thursday markets and Cherry Fayre week are excluded from future charges.</p> <p>The rest of the document seems fair to us with nothing standing out as contentious. Of course traders would always prefer a smaller charge. I presume it will affect organisations like our carnival committee but I am presuming you have included them in the consultation.</p> <p>Please can just ask that when your final document is made public we are sent a link so we can circulate to members</p>	<p>support provided</p> <p>No change to policy is proposed</p>	
293	JR2	Lifting of prohibited streets in Sidmouth	<p>I do not agree to street trading in Sidmouth, it will change Sidmouth completely and make it like a market town, which I am sure most people living in Sidmouth would not want.</p> <p>It is also not fair on the current shop owners in the town, it will put them out of business.</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 243</i></p>	No
294	JWVG S1	Lifting of prohibited streets in Sidmouth	<p>Over the years there have been many 'consultations' about having street trading in Sidmouth – and every time residents have said 'No':</p> <p><a href="https://visionforsidmouth.org/do-wewant-street-trading-in-sidmouth/">https://visionforsidmouth.org/do-wewant-street-trading-in-sidmouth/</a></p> <p>This was considered in 2008, 2012 and 2015 – but each time proposals to extend streettrading to Sidmouth was rejected:</p> <p><a href="http://futuresforumvgs.blogspot.com/2015/07/streettrading-in-sidmouth.html">http://futuresforumvgs.blogspot.com/2015/07/streettrading-in-sidmouth.html</a></p> <p>In October 2016 further consultation made it clear that it would not be happening:</p> <p><i>Sidmouth's overwhelming opposition to proposals for relaxed street trading laws could see the town excluded from East Devon-wide changes. The district council staged a public consultation on whether to lift current, widespread restrictions and allow people to apply to trade anywhere outdoors. Some 81 per cent of all respondents from Sidmouth said the changes would cause problems. Zero per cent of town businesses who responded said it would benefit them. East Devon District Council (EDDC) is now considering moving forward with its idea in other towns, but leaving Sidmouth as it is.</i></p> <p><a href="https://www.sidmouthherald.co.uk/news/20456124.sidmouth-rejects-bid-relax-streettrading-">[https://www.sidmouthherald.co.uk/news/20456124.sidmouth-rejects-bid-relax-streettrading-</a></p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 244</i></p> <p>See point 13: Under the legislation, the determining body is the EDDC licensing authority.</p> <p>Proposal to increase trading locations for which the town council would also have power to determine is not a procedure adopted in the District outside Charter market arrangements.</p>	No

laws/  
 And in March 2017, the District Council dropped all proposals for Sidmouth:  
*East Devon District Council (EDDC) is proposing to designate the whole of the district as a consent street, meaning street traders would have to apply to EDDC for a licence to trade. However, following its initial consultation, EDDC now plans to exclude Sidmouth, which would retain a general ban on street trading, except for during folk week. [*  
<https://www.sidmouthherald.co.uk/news/20455013.views-sought-trading/> ]  
 It is clear, then, that Sidmouth is very much against 'street-trading' – and yet at the same time, it is very much for 'street-markets', which are quite different beasts. And this has been the opinion held consistently for years now:  
<http://futuresforumvgs.blogspot.com/2016/12/street-trading-street-markets-andhigh.html>  
 Looking at the responses to the latest District Council consultation on introducing streettrading to Sidmouth, the opinions expressed are consistent with those from earlier consultations.  
 The Sidmouth Chamber of Commerce is against any relaxation of the current system, as it always has been – and yet would be open to food stalls on the Ham:  
<https://eastdevonnews.co.uk/2023/02/24/street-stalls-sidmouth-consultation-2023/> and  
<https://www.sidmouthherald.co.uk/news/23336218.concerns-street-trading-proposalssidmouth/>  
 The wider business community in Sidmouth are also against the proposals:  
<https://www.sidmouthherald.co.uk/news/23341182.abolish-business-rates-streettrading-allowed/>  
 The Town Council would be in favour of granting consent status to the Market Square and streets branching off it – but only for food stalls and such like on a monthly basis, that is the equivalent of a regular farmers' market:  
<https://sidmouth.gov.uk/sidmouth-towncouncils-chairs-statement/> and  
<https://www.sidmouthherald.co.uk/news/23342168.street-trading-sidmouth-towncouncils-view/> and <https://www.eastdevon.radio/news/local-news/sidmouth-towncouncils-response-to-the-ongoing-street-trading-consultation/> and  
<https://sidmouth.nub.news/news/local-news/street-trading-should-be-exception->

ratherthan-  
the-rule-in-sidmouth-town-council-chair-says-172511

Looking at the 100 or so responses on social media, the overwhelming opinion is against the proposals – and yet there are many voices who would welcome the 'variety' and 'attraction' of stalls down-town.

Again, however, almost all of those welcoming a relaxation of the current system would like to see more 'food' stalls' – something which might “*extend our town retail offer (especially food - not more burgers or pizzas though!)*”

Again and again, the comments seeing the introduction of more consent streets would only want licences allowed for a monthly farmers' market on the Ham or in the Market Square. A further comment considered the practicalities of putting up stalls in the narrow streets of the town centre:

*The plan to make additional streets 'consent streets' is problematic to me and lacks detail for residents. It feels like they have never actually visited the streets because many of them would be hugely impractical i.e cause horrific traffic within the town, too far or set away from town to even notice, take away important parking spaces or restrict access for emergency vehicles. It isn't just the Ham and the esplanade. Kennaway, Blackmore gardens, Bedford Car Park are also regularly used well for trading - I can't believe we need more?*

<https://www.facebook.com/groups/1454300221320890/posts/5913798828704318>

The Vision for Sidmouth Group's own initial comment reflects these concerns – and reflects the provisions set out by the District Council itself:

<https://visionforsidmouth.org/do-we-want-street-trading-in-sidmouth/>

1: The council makes it clear that street-trading will not be permitted if there are issues of safety, access, obstruction, parking and other practical encumbrances:

<https://eastdevon.gov.uk/licensing/street-trading/street-trading-policy-and-applicationguidance/stage-3-site-assessment/>

2: Furthermore, it makes clear that it “*The Council will not normally permit a new consent for the sale of goods or services which conflicts with those provided by nearby traders (whether street trading or in business premises).*”

<https://eastdevon.gov.uk/licensing/street-trading/street-trading-policy-andapplication-guidance/stage-5-consideration-of-applications/>

In other words, it seems clear to the VGS that by allowing across-the-board

			<p>consent throughout the town centre's Conservation Area, the District Council will not only be contradicting its own current policy guidelines, but will also be going against the overwhelming opposition expressed by the Town Council, the Chamber of Commerce, Sidmouth businesses and the Sidmouth community. The District Council is clearly keen to bring Sidmouth into line with other towns in the District, where all town centre roads are 'consent streets':</p> <p><i>"The majority of East Devon's streets are already 'consent' streets – allowing trading to take place, once an application has been submitted to and granted by EDDC."</i></p> <p><a href="https://eastdevonnews.co.uk/2023/02/20/east-devon-street-trading-rules/">https://eastdevonnews.co.uk/2023/02/20/east-devon-street-trading-rules/</a></p> <p>However, there are other towns in the District which are 'exceptions' to this rule: <i>"Honiton High Street and part of Axminster town centre have ancient charters which allow weekly markets to take place. The proposed changes do not apply to these areas as the charter exempts them from being controlled by this more modern legislation."</i></p> <p>And if Honiton and Axminster are allowed 'exception status', then East Devon's most oldfashioned and conservative town should also be allowed to continue with its current status. The overwhelming majority of comments from Sidmouth residents stress the 'unique quality' of the town – and that any large-scale allowing of street stalls would damage the town's character and setting. Sidmouth, after all, has the greatest number of listed buildings in Devon apart from Exeter.</p> <p>The Vision Group for Sidmouth in its submission would therefore urge the District Council to fully recognise the scale of the opposition to the full-scale, blanket recasting of Sidmouth's streets as 'consent streets'.</p> <p>We would propose the following:</p> <ol style="list-style-type: none"> <li>1: there should be no extension of the period of street-trading along the Esplanade beyond what is currently allowed during Folk Week;</li> <li>2: there should be no general reclassification of Sidmouth's town centre as 'consent streets';</li> <li>3: nevertheless, there should be a very controlled allowance of street-trading on the Ham and in the Market Square – with the clear and specific aim of creating a monthly local farmers' market – and that the granting of licences should be determined by the Town Council.</li> </ol>		
295	JMS1	Lifting of	After reading the article in this week's Herald I am very concerned about	Response Noted	No

		prohibited streets in Sidmouth	<p>opening up trading on the extremely cramped streets of Sidmouth. During the holiday season in particular (which, since the start of covid has been an extended period) it is difficult enough walking around town without stepping into the road. With added obstacles around town I feel people will be even less attentive to where they are stepping increasing the chance of accidents. Also, the small shops in town (who are paying exceedingly high business rates and how much of a contribution will the street traders be making )are struggling enough to make a living without bringing in further competition . I can't see that street traders will bring anything that is not already on offer in the shops. During folk festival and other similar occasions could be made exceptions but still not on the streets. If this is allowed to happen it will also attract people to set up little spots without applying for permission and who will be around to police this??</p> <p>People have come to Sidmouth for holidays and day trips for years ( also to live here ) because it is a quiet and a slightly old fashioned Regency town and are not expecting to find street traders everywhere they look.</p> <p>I think this is an unnecessary downward step</p>	<p>No change to policy is proposed</p> <p><i>Sidmouth Objection 245</i></p>	
29 page 161	PW3	Lifting of prohibited streets in Sidmouth	<p><b>ORGANISATIONS NAME REMOVED</b>, have carefully considered your proposed changes to Street Trading in Sidmouth as attached at the bottom of this email.</p> <p>In this context we gave considered your existing published <i>East Devon District Council's policy statement on Street Trading which is to -</i></p> <p><i>(a) create a street trading environment which complements premises-based trading,</i></p> <p><i>(b) is sensitive to the needs and amenities of residents,</i></p> <p><i>(c) provides diversity of consumer choice and</i></p> <p><i>(d) seeks to enhance the character and ambience of local environments.</i></p> <p>Considering these 4 criteria our views on your new draft Proposals are following your order above that -</p> <p>(1) these new proposals will challenge existing 'premises-based trading' by introducing unfair competition to existing retail and catering businesses who are already challenged by out of town retail competition and the aftermath of Covid decimating retail trade for several years,</p> <p>(2) the concept of street trading will be totally insensitive to the needs and amenities of residents as Sidmouth is already served by an excellent range of shops and catering businesses. Instead your proposal will introduce street</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 246</i></p>	No

page 162			<p>selling on the Beach and in a range of shopping and residential streets which will not serve any current need of residents and it will reduce amenities by obstructing streets, pavements and the Beach with mobile vending vans and market stalls,</p> <p>(3) as stated above Sidmouth is already served by an excellent range of retail and catering businesses. Rather than increasing consumer choice street trading will challenge and undermine existing premises-based traders so everyone loses out, and,</p> <p>(4) street trading conducted in the heart of Sidmouth which is mostly within Conservation Areas with a large number of Listed buildings will be to the detriment of the character and ambience of the local environment. Additionally, one can imagine the cooking fumes emitted from mobile vans selling hot food without proper high level extract facilities will pollute existing street.</p> <p>To conclude no argument or logic is presented to support the Council's proposed Street Trading policy. From <b>ORGANISATIONS NAME REMOVED</b> perspective the entire policy is flawed as it will be to the detriment of Sidmouth so it should be withdrawn forthwith.</p> <p>We trust that upon reflection you will agree with our comments and withdraw your proposed new Street Trading proposals for Sidmouth.</p> <p>Thanks and regards,</p>		
297	DM4	Lifting of prohibited streets in Sidmouth	<p>Comments in response to the consultation regarding 'consent streets'</p> <p>I am concerned about the proposed inclusion of Fortfield Terrace, Sidmouth in the change of designation to a 'Consent Street'. I don't feel it is a suitable location for any type of street trading/outdoor event to be allowed at any time, as the only space available is in the area allocated to residents for parking their vehicles and these changes could impact on the already limited spaces.</p> <p>Secondly, this being a very busy area at times and a public right of way and access route for both vehicles and pedestrians to the Fortfield club facilities, to include any street trading/events would pose significant safety concerns.</p> <p>Therefore it is my suggestion that Fortfield Terrace should remain a 'Prohibited Street'</p> <p>I am also not in favour of allowing more street trading along the promenade;</p> <ul style="list-style-type: none"> <li>a) dependant on the 'business' this could significantly impact on the existing businesses in the town.</li> <li>b) allowing more street trading/events along the sea front would restrict the width and hinder people's use of the promenade, as it does during</li> </ul>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 247</i></p>	No

			folk week. Unlike many other British seaside resorts Sidmouth has retained its unique charm and that is why people visit, they come to enjoy the sea front and the views, not to be hindered by street traders!		
298	JD1	Lifting of prohibited streets in Sidmouth	<p>To whom it may concern,</p> <p>As a resident of lower town (Coburg Terrace) I would like to comment on the proposed extension of street trading and the list of 'consent' streets. I have only just learnt quite how many streets have been put forward and which ones. I am not in any way anti street trading in principle – living close to Kennaway House we have enjoyed the craft fairs, street food and regular visits from the (locally run) pizza van. However, I do believe that we have to be careful to balance the benefits (choice and variety) of this type of trading with maintaining support for our existing high street traders who are facing some serious challenges. A quick walk through Sidmouth, so many shops shut in the last few months demonstrates how precarious their position is. They have steep overheads – rates, rent, etc and it is imperative that we support and not undermine them. Our choice and variety of shop is one of the things that makes Sidmouth special and brings people in. But we must also remember that it is the shops that are there for the residents, trading all year round. Street traders can turn up at peak times, take trade away from the high street and disappear for the rest of the year – that seems totally unfair on our shops and local business and will ultimately damage both our town and community. I would also question whether allowing street trading in so many different places would actually bring people in. A lot of Devon residents 'discovered' Sidmouth during covid – a gem on their doorstep they could visit for the day. Having spoken to quite a few the reason they loved it was the unique charm of Sidmouth – pretty and unspoilt. Space to stroll, lovely shops, pretty gardens, unusual architecture – a picture postcard little town. I think too much street trading would be to the detriment of all of that and would put off more than it would encourage. Trading at Kennaway works because it is contained in an area - there is plenty of space and Kennaway do a really good job at keeping it regulated and tidy, cleaning up after their events so litter is not a problem. Which brings us to some of the streets suggested...some of them are simply unsuitable and inappropriate. Some unsuitable (too narrow, parking already a problem), some inappropriate. I was, to be quite frank, astounded that Fortfield Terrace was on the list. The view of Fortfield Terrace is iconic to Sidmouth – can you imagine Bath putting a row of street traders in front of The Royal Crescent?? No, of course not! Nor should we. Since we have a home on the</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 248</i></p>	No

			<p><b>PERSONAL DATA REMOVED</b> I would like to object specifically to street trading along Coburg road up to the church. Aside from it being right next to Kennaway (where there is already trading) it is already a very well used section of grass. Daffodils in the Spring, families and children playing and picnicking in the Summer – the grass struggles as it is. If it was used for stalls and trading it would soon be no more than a patch of mud which would be a huge shame. Parking (or lack of) and traffic is also already a problem.</p> <p>So, in summary, although I am not against all street trading, I would like to object to the scale of this proposal – too much street trading would be to the detriment of local businesses and therefore to the town and community. Where street trading is allowed should be selected really carefully, so that it does not impact on the unique character and unspoilt nature of Sidmouth, nor make local parking or traffic problems any worse. I would specifically like to object to Coburg Road being on the list. We are already well served by traders at Kennaway House, the attractive grass and flower area would soon be spoilt, becoming an ugly muddy patch and the parking and traffic issues would become even worse.</p>		
29 page 164	CK1	Lifting of prohibited streets in Sidmouth	<p>I would like to object to the proposal to vastly expand the street trading consent areas in Sidmouth.</p> <p>The current arrangement works well and strikes a balance between the ability for street traders to capitalise on a vastly expanded town population in folk festival week and allowing our established bricks and mortar traders to have full access to their customer base at other leaner times of the year. Allowing street traders to visit the town more regularly could seriously undermine the existing businesses in the town and be detrimental to the long term economic viability of many.</p> <p>There are several key issues with allowing an expansion of the street trading offering within the town.</p> <p>Firstly some of the areas identified within the consultation are simply unsuitable to permit vans or stalls to be situated without adversely affecting the unique character of the town as well as generating associated problems such as negative impact on traffic flow, a reduction in available parking spaces and the spectre of increased litter.</p> <p>To allow regular trading on the beach and esplanade would go against existing restrictions on trade on these areas which conserve the unique non</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Objection 249</i> Original email was sent on 25<sup>th</sup> – email comments accepted.</p>	No

			<p>commercial character of the town in these special areas.</p> <p>It is mentioned that traders would only be allowed if they did not compete directly with existing offers in the town. I fail to see what sort of street vending could not compete with the vast array of businesses and services that the town already offers. There is an argument to say that street vendors would attract business to the town but I feel there is the opportunity to do this through better organised complementary events rather than simply a market day.</p> <p>Maybe EDDC and the chamber of commerce could work together to stage a monthly weekend event to be held on the esplanade, beach or ham - such as the seafest- which would attract custom without competing with our established vendors?</p> <p>It is a fact that the high street is facing a tough time in the face of in line competition. The overheads which are a fact of life for our bricks and mortar trader - such as business rates, rents, mortgages, repair and maintenance and of course the employment of local staff - mean in many cases they are disadvantaged when compared to their on line counterparts.</p> <p>To then allow street traders to set up on the esplanade which is probably a better position in terms of footfall than many of the towns shops enjoy, is quite frankly unfair.</p> <p>Our established businesses are the lifeblood of the town. In many cases they pay significant business rates, they employ local labour, they contribute to the vibrancy of the locality.</p> <p>Every effort should be made to fully support them and not potentially undermine their viability through introducing another level of competition where the level of investment and overheads allows an unfair advantage</p>		
300	MWT1	Lifting of prohibited streets in Sidmouth	<p>Dear members of the Licensing Committee, and Licensing Department,</p> <p>I am writing about the consultation on Street Trading Policy which closes this coming Sunday, February 26th.</p> <p>I find the document sensible and well thought out, which then makes it very strange that you are considering making many streets in Sidmouth 'Consent Streets'. I object to nearly all of the streets proposed.</p> <p>In the document you say that street traders will not be allowed to compete with established businesses nearby, but you do not specify what you consider 'nearby'. To me nearby is within easy walking distance for most people.</p>	<p>Response Noted</p> <p>No change to policy is proposed</p> <p><i>Sidmouth Objection 250</i></p>	No

Sidmouth has a very compact centre where I would consider everything nearby. It then stretches up High Street where many types of shops are replicated, this means that the top of High Street has many different types of shops 'nearby' too. At an easy amble you can get from the top of Church Street, through town to the top of High Street in 5 minutes.

From the Esplanade it is very easy to reach the centre of town for a range of shops and food outlets are spaced along its length, this will be even more the case when Rockfish eventually opens.

The only shop we do not have is a high quality butcher, and street traders don't often work as butchers.

I would have expected that someone would have looked at the shops we have before considering adding Street Traders to the mix. So are we looking at having the type of traders who are on the Esplanade during Folk Week? If so the jewellery traders will compete with our jewellers, we have at least 5. The clothes sellers will compete with the new and secondhand clothes shops, we have at least 6 new and 5 selling second hand of various types. The hat sellers will compete with at least 3 shops selling hats. The bag sellers will compete with at least 4 shops who sell bags. Food stalls will compete with our many cafes and food shops who offer a variety of cuisines. And so on. So if you stick to your rule all these types and more should not be allowed. Which leaves us with a very limited range of street trader, most of whom are not a good fit for the image Sidmouth wishes to present. You also make it clear that Street Trading will not be allowed in places where they cause traffic problems or conflict with Traffic Orders :-

( will not be granted if) *There is a conflict with Traffic Orders such as waiting restrictions, or*

- *The site or pitch obstructs either pedestrian or vehicular access, or traffic flows, or places*
- *pedestrians in danger when in use for street trading purposes, or*
- *The trading unit obstructs the safe passage of users of the footway or carriageway through the existence of any trading vehicle on a road or highway increasing risks to road users, or*
- *The pitch interferes with sight lines for any road users such as at road junctions, or pedestrian crossing facilities, or*
- *The site does not allow the consent holder, staff and customers to park in a safe manner.*

Yet most of the roads you propose either have double yellow lines on both sides, or parking on one side and double yellow lines on the other.

Are you proposing traders should replace parking, or set up in front of shop windows thus adversely affecting shops' trading conditions? If not the streets are not suitable for street traders.

Or perhaps you are proposing that they clutter the pavements so that it becomes very difficult for the less agile and for families to get around? Sidmouth attracts families and the frail as well as having many of our own. I have added information to each one of your proposed new Consent Streets below. Checking on Google Streetview will support my points.

*All Saints Road* .... The east end of All Saint's Road has parking on one side and double yellow lines on the other, the west end has double yellow and single yellow. This is a busy bus route where traffic often has to wait to pass the parked cars.

*Bedford Square and including the un-named street leading from Bedford Square to the Esplanade* .....

These have double yellow lines both sides. Bedford Sq has parking in the middle as well as the lines.

There are garage entrances to the north. The Bedford Hotel and Riviera Hotel service entrances are on here.

*Blackmore View* ..... I assume you mean Blackmore Drive as Blackmore View is the block of flats. Access needed for residences both sides of the road, the gardens and library. Cul-de-sac, double yellow lines both sides, narrow pavements. Only possible place for trading is outside the library, and all the shops and cafes on High Street are nearby.

*Chapel Road* ..... Double yellow lines both sides, one way, narrow, no pavements

*Chapel Street* ..... Double yellow lines both sides, one way, narrow, no pavements.

*Church Street* .... mainly pedestrian street lined both sides with shop windows. Businesses already use the space outside their windows where permitted. If they are not permitted to do so then neither would street traders be permitted. One way road with access only for residents and businesses ( and perhaps taxis).

*Coburg Road - between Coburg Terrace and Church Street* .... one way street with either double yellow lines both sides or parking opposite double yellow lines. Possibility for traders on the grass verge under trees but would spoil the feel of the conservation area, as well as potentially cause damage to grass and trees.

*Dove Lane - and the lane between Dove Lane & New Street ....* Dove lane is narrow at both ends but wider in the middle where there is the Tasty Baguette who put tables outside,

*Fore Street .....* Double yellow at the top, parking opposite double yellow in the middle, double parking at the south. Very narrow pavements most of the way. Coaches also reverse into the south of the road to turn round after dropping passengers.

*Fortfield Place ....* This is a stretch of Station Road, near the south end and so has the same problems as most of Station Road, yellow lines, bus route, narrow pavements, etc.

*Fortfield Terrace .....* A cul-de-sac in front of private houses. It has angled parking on the south side of the road leaving a narrow single track on the north. The parking is probably residents parking which makes it likely that this is a private road and EDDC has no power to allow trading on it. There is no room for trading in any case.

*Glen Road, - south of Manor Road ....* single yellow lines both sides, narrow pavement on one side only all the way to the Esplanade. No space for traders

*Ham Lane and East Street - from the Esplanade to Fore Street .....* Ham Lane has double yellow lines on both sides as it leads to two car parks and the Leisure Centre, so is a busy road. An off shoot of East Street on the side of the western car park has double yellow lines on both sides until it becomes pedestrianised near Fore Street, there is potential for one trader in the wider pedestrian section. Anything else would block access to Trump's Court and the houses.

*High Street .....* High Street has double yellow lines both sides at the top, parking opposite double yellow lines further south, then double yellows both sides, then parking opposite double yellows. The street is lined with shop windows. Even where the pavement is wide enough any traders would obscure windows except in places where they would obscure listed buildings. Neither is acceptable.

*King Street ...* I assume you mean Kings Lane? Sidmouth does not have a King Street. A dark and narrow passage where any trading would obstruct pedestrians

*Manor Road ....* single yellow lines both sides, pavements not wide enough to accommodate trading. A road full of expensive residential properties where traders are not likely to be welcome.

*Market Place .....* There is some limited space here that traders could use, but it is surrounded by businesses which traders may be in competition with. Shop

windows all round. Taxi and deliveries access needed both to and across it.  
*Mill Street, - west of its junction with Russell Street* ..... Mill Street does not have a junction with Russell Street. The north end of Russell Street meets York Street.  
 Mill Street comes south from the ford then turns a right angle west to meet High Street, from the ford until it changes direction it has double yellow lines. When it is going west it has parking on the south side and double yellow lines on the north. The pavements are narrow and so is the road past the parked cars. Any traders here would cause obstruction as well as competing with shops just a short distance away.  
*Millford Road, - north of the ford* ..... There are no pavements here, the road is narrow. On the west side is parking, on the east double yellow lines; except for the north end which has double yellow lines both sides.  
*New Street* .... no space unless you are to block the road giving access to the Anchor pub, the Taxi Rank, and businesses on the Market Place and Old Fore Street. Business shop windows on both sides of the road.  
*Old Fore Street* ..... A pedestrianised street where businesses spill out onto the pavement, the centre of the 'road' is full of people in the summer and shops get deliveries. Any street traders are likely to block shop windows.  
*Peak Hill Road – east from its junction with Cotmaton Road* ..... Turning east from Cotmaton Road down Peak Hill the road has double yellow lines each side until just below 'Windgates' where there is parking against the hedge on the south side. There are no pavements. This parking restricts the road to single width and there is no place for customers if a trader set up here. Double yellow lines resume soon and there are still no pavements. The lines stop once again on the south side, this time next to a narrow pavement, at the top of the daffodil field above Connaught Gardens. Traders would not be suitable on this open field and there is nowhere else for them. The double yellow lines start again on the south at the entrance to the Chine next to the Gardens. They continue into town. Any trader trying to use the parking spaces as a pitch would either block the narrow pavement with their customers or have to have them stand in the road.  
*Prospect Place* .... This is the main route from the town to the beach, it is always very crowded in summer. The entrance to Duke's outside area, and an ice-cream kiosk, is on the west and businesses with shop windows to the east. It leads to the zebra crossing.

All the space here is already well used and traders would get in the way.

*Radway, - south of the Post Office ....* I assume you mean the Old Post Office as the current Post Office is on High Street. This area is very difficult for traffic, it is a bus route, has roads joining with poor visibility, there is a pedestrian crossing and a mini island as well. Pavements are narrow on the east and the wide pavements on the west ( in places where sight lines would not be obscured for traffic leaving the Conservative Club car park ) have entrances and shop windows.

*Salcombe Road .....* a residential road with double yellow lines both sides on the east near the river bridge, further west towards Radway it changes to double yellow one side and single yellow the other.

East over the river bridge there is parking just outside the Byes. If these spaces were replaced by trading spaces it would have to be specified that customers accessed them from The Byes as they are on a blind corner. I can see no justification for losing these parking spaces.

*Sid Road, - south of Redwood Road .....* narrow mainly without pavements, double yellow lines both sides.

*Station Road - between Knowle Drive and The Esplanade .....* Just below Knowle Drive the road is restricted to a single carriageway with pavement on one side only, not wide enough to have a trader on it. If something was permitted it would obscure traffic sight lines. Then moving south, driveways for residential properties and the two openings to parking for the Woodlands Hotel; then a mini island then the possibility of a trading place on the grass verge shortly before the road narrows to single carriageway again. However, I believe that anything on that grass verge would obstruct sight lines of traffic leaving Cotmaton Road. South of this second narrowing the pavements are better but not good enough to allow a trader and customers without obstruction to pedestrians. Further south again there is a wide piece of pavement, with a bench, on the north side of Roselands but there is no pavement opposite so all foot traffic is on the Roselands side. I think any trading here would severely reduce visibility of and for traffic leaving Roselands. South again the pavements disappear completely before returning. There is potential for trading at the junction of Manor Road and Seafield Road, but no further south than that; as pavements are either narrow or absent. All through this section the roads have single or double yellow lines, it is also a bus and coach route as well as taking delivery lorries out of town. On Station Road south of the Three Cornered Plot the pavements are not wide enough for traders and the road has double yellow lines each side.

*Streets adjoining the Three Cornered Plot (Known as The Triangle) ....* There are some possibilities here but also a risk of being in the way of bus passengers. This is a turn-round and waiting area for buses.

*The Beach – from the mouth of the River Sid westwards to a point opposite Clifton Cottage....* Sidmouth is not the sort of town which has traders on the beach. Also, the beach is very moveable and unstable as well as often steep. We have groups who volunteer to keep the beach clean which is already a difficult task; we would not want to add to the potential for rubbish to be left there.

*The un-named street between Elizabeth Hotel and Marlborough Hotel (now Dukes) ....* This is a single lane road leading to housing, there is parking for Duke's near the south end. This road can not be blocked with trading.

*Vicarage Road, - south of Connaught Road ....* on a bus route, parking bays on the east double yellow lines on the west. There is a shop on the corner of Connaught Road and then two telephone boxes. The pavement isn't wide enough for traders unless they obstructed these. Very shortly after the phone boxes is the entrance to the Old Post Office yard which has a bus stop on the other side of it. Any street trader in this area would make exiting this yard more dangerous. After the yard entrance is the Old Post Office and comments about that have been made elsewhere.

*York Street ....* Very narrow with double yellow lines both sides, cars have to slow to a crawl to pass each other in different directions, pavements narrow or absent. I am amazed you considered this.

*Vicarage Road, - south of Connaught Road ...* You have duplicated this, why didn't someone spot it?

*The following is a Consent Street but shall only be granted during a period annually from 1st May to 1st September;*

*Esplanade & Promenade ....* The Esplanade has double yellow lines on the road, on the promenade part of the Esplanade we need the full width without traders on there.

As part of the Beach Management Plan it will become necessary at some stage to rebuild the dwarf wall, this is likely to take up more width than at present. While discussing any such wall the businesses along the front have made it clear that the sea view is part of their unique selling point and blocking that view will be vigorously opposed. Blocking the view with traders is unlikely to be any more welcome.

Current promenaders, in February, fill the width of the space

			<p>and can pass each other freely. In summer it is crowded and you have to wait for people before you can pass by. Putting traders on there, as in Folk Week leads to practically stationary crowds and no room for children or the less able. I do not support traders here except on specific occasions.</p> <p>In conclusion:-</p> <p>On most of the roads you are proposing should be come 'Consent' roads trading would be prohibited by your own rules. It therefore seems to be perverse to change their designation. They are also mostly in Conservation Areas or near listed buildings, street trading runs the risk of destroying the ability to read the setting of listed buildings.</p> <p>There are no road spaces traders could use that would not deprive Sidmouth of parking spaces. Sidmouth needs more, not less, parking.</p> <p>In the other cases, like on the beach or Esplanade, the proposal goes against the aspirations of Sidmouth to retain its unique identity as befits a town with more listed buildings than any other town in Devon except for Exeter.</p> <p>We pride ourselves on providing a traditional atmosphere where things are done in a calm and oldfashioned way. So some street traders, in safe areas, at specific times, could be good: like people selling roasted chestnuts in the evening during Christmas late shopping openings. Sellers of 'tat' are not needed.</p> <p>If any of these street were to be made 'Consent Streets' I believe that firm time limitations would need to be applied, for example a monthly food market in the Market square, or stalls on Sundays at times when shops are shut. Other restrictions such as hand barrows only, no vans or full sized market stalls, might be required in places away from the Market Place.</p> <p>I fear that changing the designation will do little other than overwhelm your officers with work refusing applications and we all know that money and staffing is tight already.</p>		
301	BA1	Lifting of prohibited streets in Sidmouth	<p>With regard to your request for residents views:</p> <p>Street Trading pre dates bricks and mortar shops, regional shopping centres and internet shopping, by hundreds of years, and therefore it has an important place in our towns and cities — who knows,</p> <p>Environmental changes may well force a return to this as our major method of obtaining goods!</p> <p>The proposed EDDC changes to the regulations take a too broad brush approach, almost deregulating the whole of central Sidmouth, without</p>	<p>Response Noted No change to policy is proposed</p> <p><i>Sidmouth Support 25 – "hub" concept</i></p>	No

recognising the key arteries for traffic and pedestrians and without understanding where traders might sensibly seek to be located for profitable sales, most of all, the proposals overlook the opportunities to use additional street trading as a boost to the number of visitors at currently under visited locations eg Kennaway House, Sidmouth Museum, The Toy Museum etc. Key to the success of any changes will be the creation of a "Hub" in which street trading would often take place to the benefit of existing businesses and visitors. A short walk around central Sidmouth will quickly illustrate that the key traffic arteries : Vicarage Road, All Saints Road, High Street, Fore Street, Station Road and much of the Esplanade, should be kept as "prohibited areas" street trading and the "Hub" should be created by restricting traffic during key shopping times in Old Fore Street, New Street, Church Street and the Market Square. Once the decision is taken to create the "Hub" then the opportunities can be assessed on a seasonal / monthly / weekly basis and a cohesive programme offered to potential traders – rather than await their piecemeal approaches.

I am not a dreamer, one just who longs for French or German food markets, selling artisan upmarket products to the well heeled of Sidmouth (but they should have a place in the programme!) my view is that street traders will increase the diversity of our family friendly, budget, hot food offerings;, add ethnicity to our ranges and provide real entertainments, with additional reasons to visit our town centre both during the day and especially summer evenings. Farmers Markets, Plant Markets, Craft Markets World Foods ( hot) and (cold), Christmas Market, plus regular musical input — not just during Folk Week or Jazz Festival.

Of course care must be taken to avoid the tatty mix of shoddy goods and unappetising food seen elsewhere, but that will be easier if there is a clear identity and vision for the "Hub"

I trust you will consider my comments which are made based on (almost) a lifetime in retail.

## **APPENDIX B**

### **Designated Streets in Sidmouth (2 October 2017)**

**The following are designated as Prohibited Streets where street trading is at all times forbidden by law;**

- ❑ All Saints Road
- ❑ Bedford Square and including the un-named street leading from Bedford Square to the Esplanade
- ❑ Blackmore View
- ❑ Chapel Road
- ❑ Chapel Street
- ❑ Church Street
- ❑ Coburg Road - between Coburg Terrace and Church Street
- ❑ Dove Lane - and the lane between Dove Lane & New Street
- ❑ Fore Street
- ❑ Fortfield Place
- ❑ Fortfield Terrace
- ❑ Glen Road, - south of Manor Road
- ❑ Ham Lane and East Street - from the Esplanade to Fore Street
- ❑ High Street
- ❑ King Street
- ❑ Manor Road
- ❑ Market Place
- ❑ Mill Street, - west of its junction with Russell Street
- ❑ Millford Road, - north of the ford
- ❑ New Street
- ❑ Old Fore Street
- ❑ Peak Hill Road – east from its junction with Cotmaton Road.
- ❑ Prospect Place
- ❑ Radway, - south of the Post Office
- ❑ Salcombe Road
- ❑ Sid Road, - south of Redwood Road
- ❑ Station Road - between Knowle Drive and The Esplanade
- ❑ Streets adjoining the Three Cornered Plot (Known as The Triangle)
- ❑ The Beach – from the mouth of the River Sid westwards to a point opposite Clifton Cottage.
- ❑ The un-named street between Elizabeth Hotel and Marlborough Hotel (now Dukes)
- ❑ Vicarage Road, - south of Connaught Road
- ❑ York Street
- ❑ Vicarage Road, - south of Connaught Road

**The following is a Consent Street but as a matter of policy consents shall only be granted during Sidmouth Folk Week;**

- ❑ Esplanade & Promenade



# **EAST DEVON DISTRICT COUNCIL**

## **Street Trading Policy**

**Draft 2023**

Version 2

East Devon District Council  
Licensing Team  
Blackdown House  
Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ

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## 1 OVERVIEW

- 1.1 East Devon District Council (“the Council”) has adopted Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982 with regards to street trading within its area. The Council can properly regulate those traders who sell articles without the use of ordinary business premises and those traders who move from place to place.
- 1.2 In 2017 the Council designated all of its administrative area as a Consent Street for street trading purposes, although street trading has remained prohibited in a small part of Sidmouth. This means that in the consent streets anyone wanting to street trade must obtain consent from the Council first.
- 1.3 The purpose of this policy is to provide a framework for applicants looking to gain consent to trade within the district. The requirement to obtain a consent for any street trading is wide-ranging and would include, for example, all hot and cold food vendors selling burgers, kebabs, doughnuts, ice cream, drinks etc., and all vendors of non-food products from any vehicle, stall, barrow, trailer, bike or any other moveable or static structure. It sets out the standards for determination of applications and the enforcement of street trading activities to ensure a consistent approach.
- 1.4 Each application will be considered on its merits. Public **Health and** safety will be a key consideration with each application as well as the prevention of crime, disorder, and nuisance.
- 1.5 This policy supports a street trading experience that is diverse, vibrant and adds to the social and cultural fabric of East Devon that maintains, protects and enhances our environment. The policy aims to ensure that it meets the needs of traders, residents, businesses and visitors to East Devon

## 2 WHAT IS STREET TRADING

Within this document the following definitions apply:

<b><i>Street Trading</i></b>	Means the selling or exposing or offering for sale of any article (including a living thing) in any street. From this definition, any person offering purely a service e.g. a shoeshine (where there are no tangible goods such as a picture or sketch) will not be subject to the street trading legislation.
<b><i>Street</i></b>	Includes: <ol style="list-style-type: none"><li>a) Any road, footway, beach or other area to which the public have access without payment.</li><li>b) A service area as defined in section 329 of the Highways Act 1980,</li></ol> and also includes any part of a street.
<b><i>Consent Street</i></b>	Means a street in which street trading is prohibited without the consent of East Devon District Council.
<b><i>Consent</i></b>	Means a consent to trade on a street by East Devon District Council.
<b><i>Consent Holder</i></b>	Means the person or company to whom the consent to trade on a street has been granted by East Devon District Council.
<b><i>Authorised Officer</i></b>	Means an officer employed by East Devon District Council and authorised by the Council to act in accordance with the provisions of the Local Government (Miscellaneous Provisions) Act 1982

### 3 EXEMPTIONS (Statutory and Local)

3.1 The following are legally exempt from the need to obtain street trading consent;

- (a) Shops and petrol filling stations (including selling in the street adjoining such premises provided it is part of the business of the premises).
- (b) Operating properly as a Pedlar (see our [Guidance for pedlars selling on the streets of East Devon - East Devon](#)),
- (c) Markets or fairs where the right is granted through any enactment or order,
- (d) Trading in a trunk road picnic area,
- (e) News vendors (unless the stall exceeds a certain size) and
- (f) Roundsmen, for the purposes of exemption, being defined as a person who regularly travels a set route making deliveries to regular customers. The legal precedent in case law (Kempin t/a British Bulldog Ice Cream V Brighton and Hove Council), ruled that a roundsman was someone who delivered pre-ordered goods within a locality.

3.2 The following are exempt from the need to obtain a street trading consent as a matter of policy choice;

- (a) School, church or village fetes or fetes organized by town or parish Councils (or similar such events) where the event is not in close proximity to a commercial area.
- (b) Funfairs or circuses where the primary purpose is the funfair or circus and the street trading activity is ancillary to the purpose, related to and in close proximity to the funfair or circus.
- (c) Non-commercial car boot sales (where the event organiser whether an individual or company does not profit).
- (d) Residential properties selling items which are surplus to domestic requirements (e.g. home grown / produced jams, fruit, vegetables, eggs etc) provided the sale is within the curtilage of the property or immediately adjacent to it and it is not a commercial concern.
- (e) Those activities that are so minor in nature that in the opinion of the Strategic Lead (Governance and Licensing) or Licensing Manager a street trading consent is not justified.

3.3 The following activities do not fall within the requirement for a street trading consent;

- (a) Educational / information / charity stands not selling any articles.
- (b) Charitable street collections (there is a separate policy for this) including those with one or two tables selling items which solely benefit ~~the~~ a registered charity.

### 4 LOCATIONS, PERMISSIONS

#### 4.1 East Devon District Council Owned Land

When deciding where to trade, you must consider which permissions you may need

- (a) Any trading from any parks, car parks, open spaces, beaches or other land owned by East Devon District Council will require prior consent to hire the land and to conduct the activity before trading can be approved. The Council aims to ensure that only one fee is charged for use of land, although other chargeable contracts, permits or licenses may be required.
- (b) Consent for trading on the Councils land should be sought and initial confirmation received from Events/Property & Estates before any consideration to receiving a street trading application. The licensing team reserve the right to decline the commencement of Stage 3 consultation for street trading that does not have the initial approval to use the land.

- (c) Officers cannot contact other departments on your behalf. All permissions should be in place before you submit your street trading application **or an enquiry submitted to the events team for permission is principle.**
- (d) Public Liability Insurance which will not be provided by the Council. The responsibility for reviewing and confirming all necessary insurance cover, including trading will be required by the Events team ensuring sufficient insurance cover exists for any events occurring on EDDC land.

## 4.2 Privately Owned And Enclosed Land

If you wish to trade on **private land**, written approval from the land owner must be obtained prior to making an application. Trading on privately owned land that abuts or joins any highway will usually require consent and persons wishing to trade from such areas should contact the licensing team prior to submitting an application or commencing trading. Trading on privately owned land may also require Street Trading Consent.

Street trading consent may not be required for privately owned land where access is restricted to the public as a result of;

- (a) The public being required to make payment for entering, or
- (b) Permanent, raised structural boundaries surrounding the trading location (walls, fencing and gates), or where access is gained by entering a building or premises, or
- (c) On land within the approved plan of any premises being licensed for sale of alcohol, for example public house gardens and other licensed outdoor areas. Licensing reserve the right to review areas of land sought for trading that are outside the defined plan (for example beside, nearby and otherwise not part of a currently licensed area).
- (d) Caravan and camping sites where the public do not have free or unobstructed access will be reviewed on a case by case basis. Where public access is restricted and where trading is not conducted on to a public area, trading consent will not be required.
- (e) Where existing businesses seek to allow trading or traders directly outside that premises selling products of the same nature or by providing access to their staff. The circumstances will be reviewed to consider inviting an application as commercial trader outside the premises.
- (f) Consent for trading from privately owned land and all land other than EDDC land should be confirmed in writing to the licensing team. Licensing may decline commencement of street trading consultation for trading that does not have the written approval to use the land.
- (g) Where trading is conducted directly onto any road or highway from an unrestricted location, street trading consent will be required. It is the responsibility of each applicant, in the first instance, to identify the location(s) they wish to consider trading from as there is no designated list of street trading 'pitches' provided by the licensing team.

## Consents

- 4.3 In the case of mobile street traders where there is a genuine need to ply trade in many locations, being those who move from street to street in residential areas/housing estates in a way that involves continuously moving around, but trade for less than 15 minutes at any one point and who don't return to a similar trading position within 24 hours (e.g. an ice-cream van).
- 4.4 Mobile street traders must adhere to relevant traffic legislation and conduct business in a safe manner. Conflict with an existing business in the immediate vicinity will not support trading under these circumstances.
- 4.5 Consents may be granted on a daily, weekly, monthly, seasonal or yearly basis. No consent shall be longer than 12 months. All consents will expire on the expiry date and further trading will require a new application to be made and granted. It is advised that a new application is applied for sufficiently in advance of the expiry date.

## 5 SUITABILITY OF APPLICANTS

When determining an application for the grant or renewal of a street trading consent, or a block booking consent the Council will consider all relevant information relating to the suitability of the applicant to hold such a consent. Street Traders are subject to minimum levels of supervision, they interact closely with members of the public and it is important that the public, especially vulnerable people are protected from harm, and from those who may harm them, wherever possible.

The Council will determine whether the applicant is a suitable person to carry on business as a street trader and may not issue a consent unless satisfied that the applicant is suitable. In determining this, the Council may have regard to any information, which it considers relevant including:

- (a) Relevant responses received during each consultation
- (b) Whether the applicant has been convicted of a relevant offence outlined in the policy appendix
- (c) Refusal or neglect in paying fees due to the Council for a street trading consent, or for any other charges due for other services rendered by the Council to the applicant as the holder of a street trading consent;
- (d) Any previous enforcement action;
- (e) Any previous refusal of an application for the grant or renewal of a Street Trading Consent;
- (f) Any previous revocation of a Street Trading Consent
- (g) Any abusive, offensive, aggressive or insulting language or behaviour towards reception or licensing staff will not be tolerated. It will lead to contact ceasing instantly and the licensing process stopped.

## **6 APPLICATION PROCEDURE**

- 6.1 The council will only accept and validate applications in the prescribed format. Contact can be made with the Council's Licensing Team by emailing [licensing@eastdevon.gov.uk](mailto:licensing@eastdevon.gov.uk). Licensing officers cannot provide landowner permission to trade.
- 6.2 The application and approval procedure comprises certain stages, detailed below. Applications must be submitted no earlier than one calendar year of the proposed trading date. The Licensing team reserves the right to consult closer to the date requested. Applicants are advised to apply no later than 6 weeks prior to the proposed trading date.
- 6.3 There is no statutory requirement to consult before determining street trading consent, however, to ensure openness and transparency the Council has chosen to carry out consultation in relation to applications that meet the criteria for consideration.

### **STAGE 1 - SUBMISSION OF THE APPLICATION**

- 6.4 In addition to a completed and signed street trading application applicants will need to submit a fully completed application and with the following documents (payable at the applicants own expense):
  - (a) 1 copy of a map of the trading site. The map should clearly identify the proposed site position by marking the site boundary with a red line. The map should include the nearest residential and commercial properties to the trading site. Applications for mobile trading consents (e.g. fish and chip vans) must provide specific routes and the locations they wish to trade from.
  - (b) Evidence of a current Food Hygiene Rating Scheme score of at least 3 from the relevant home Authority (to include which authority) where there is the sale of food or drink.
  - (c) A copy of the certificate of insurance that covers the street trading activity for third party and public liability risks with an appropriate level of cover (this will usually be a minimum cover level of ~~£2,000,000~~ **£5,000,000**).
  - (d) Consent holder to provide photographic ID and evidence of right to work in the UK (not being relevant to applications under block bookings below)
  - (e) A Basic Disclosure with your application form being no older than 3 calendar months from date of issue, which can be obtained from the Disclosure and Barring Service

<https://www.gov.uk/government/publications/basic-checks> (not being relevant to applications under block bookings below). An update will be necessary after 3 years from obtaining or if circumstances change, when the Licensing team should be notified.

- (f) Any assistant staff working alone at a consent location must be a minimum of 17 years old and have a sound understanding of the conditions outlined on the consent document. You will need to complete their details on the application form and supply a Basic DBS check (no more than three months old).
- (g) A colour photograph showing the stall, vehicle or barrow which is to be used from the front back and sides. It is not necessary to show what is being sold (being a discretionary requirement to applications under block bookings below).
- (h) Traders gaining consent for at least one location for the period of one year, may provide notification to Licensing to allow consent for trading at other temporary events if trading will be for less than 24 hours and the number of the trading days are less than 7 each year.
- (i) Written approval from the land owner must be obtained prior to making an application

## **BLOCK BOOKING APPLICATIONS**

- 6.5 An event organiser may apply for a single block consent for a short term event where there is to be a number of traders (e.g. farmers markets) using the application form. The event organiser will need to obtain confirmation from all stall holders carrying out a street trading activity that they comply with the requirements of 6.4 (b) and 6.4 (c) above, along with the details of what is being sold. A traders list will need to be provided to the Council as part of the application at least 10 working days prior to the event commencing. Event organiser(s) in receipt of a block consent will be expected to take reasonable responsibility for trading activities by ensuring compliance with the block consent conditions.
- 6.6 Compliance with laws and legislation (Food Hygiene, Health and Safety, waste disposal and so on) will be the responsibility of each trader and failure to comply may result in the trader consent being revoked, subsequent applications being refused and enforcement action occurring.

## **FEEES**

- 6.7 The fees set by the District Council for the grant, variation or renewal of a street trading consent must be paid to validate and process the application. Council services may set different fees relating to nature of each contract, concession, licence or consent upon application. Market forces may be taken into consideration to a certain extent in determining the different fee levels for concessions.
- 6.8 Application fees will be reviewed annually on a cost recovery basis and any variation will be approved by Council. Details of the current fees can be found on the Council's website via this link [[add here](#)].
- 6.9 Application fees must accompany the application for grant or renewal of the consent. If an application does not proceed to commencing Stage 3 Consultation, a refund will be repaid by the Council to the applicant. Failure to make payment may result in the consent not being renewed. If an Applicant does surrender their consent or the consent is revoked, the Council shall not refund the application fee being paid for work undertaken to consult, determine, grant or renew the consent.
- 6.10 It is not possible to process incomplete or unpaid applications or applications not received via the online portal.

## **STAGE 2 – CONSULTATIONS**

- 6.11 Before a street trading consent is granted, the council will carry out a consultation process with:
  - The Highways Authority (Devon County Council) / Highways England

- Devon and Cornwall Police
- Devon and Somerset Fire & Rescue Service (DSFR) where appropriate
- The Council's Environmental Health (Commercial and Environment Protection) Teams
- The relevant Ward Members (unless they are the applicant)
- The appropriate Parish or Town Council (unless they are the applicant)
- Other appropriate organisations or businesses that may have a relevant need to be consulted being considered on a case by case basis.

6.12 Where practicable, 28 days will be given for representations to be received, where appropriate consultation may conclude sooner. Tacit consent does not apply. Trading cannot begin without consent as it is in the public interest that applications are processed before they can be granted.

6.13 Consultation for street trading applications will be separate to those consultations by other council services (for example for use or hire of council owned land).

### **SAFETY ADVISORY GROUP**

6.14 The popularity and increase of live musical and similar entertainment in the open with associated trading can provide opportunities for community involvement, civic pride and attracts visitors to East Devon. The success of such events depends upon the quality, levels of safety and consideration for the rights of people who live or work in the vicinity and the standard of provision of facilities for those coming to enjoy the event. The council has established a multi-agency Safety Advisory Group (SAG) to assist organisers co-ordinating events comprising of agencies having an interest in, or legislative role relevant to, such events together with representatives of the emergency services.

6.15 Where necessary a SAG meeting will consider any issues that will require to be addressed and to open up lines of communication with organisers. This is important as it will assist with measures that organisers need to put in place to plan the event. Risks can be adequately mitigated by the submission of an up to date, relevant, detailed and complete Event Management Plan specific to the proposed event on each separate occasion. It is a requirement when planning events on EDDC land.

6.16 The Council recommends that organisers of public trading events should contact the Safety Advisory Group coordinator at least six month before any event being considered emailing [SafetyAdvisor.group@eastdevon.gov.uk](mailto:SafetyAdvisor.group@eastdevon.gov.uk)

6.17 Stage 2 consultations may be delayed or not progressed in circumstances where an event organizer has not consulted or attended the SAG in advance of submitting an application.

### **STAGE 3 – SITE ASSESSMENT**

6.18 Officers will assess the suitability of the site for the street trading activity to occur.

6.19 Street trading consents from static locations will generally **not** be granted where;

- A significant effect on road safety would arise either from the siting of the trading activity itself, or from customers visiting or leaving the site, or
- There are concerns over the recorded level of personal injury accidents in the locality where the street trading activity will be sited, or
- There is a conflict with Traffic Orders such as waiting restrictions, or
- The site or pitch obstructs either pedestrian or vehicular access, or traffic flows, or places pedestrians in danger when in use for street trading purposes, or
- The trading unit obstructs the safe passage of users of the footway or carriageway through the existence of any trading vehicle on a road or highway increasing risks to road users, or
- The pitch interferes with sight lines for any road users such as at road junctions, or pedestrian

crossing facilities, or

- The site does not allow the consent holder, staff and customers to park in a safe manner, or
  - The street trading activity is carried out after dusk and the site is not adequately lit to allow safe access and egress from the site for both customers and staff.
  - The siting and operation of any stall, barrow etc. operated by a consent holder or people employed by them causes problems of highway safety, obstruction to users of the highway, or conflict with the requirement of emergency vehicles
  - Street trading requests for certain areas of Exmouth Seafront may not be considered suitable, due to health and safety and highway issues. Each application will be considered on its own merit.
  - The impact of proposed trading within an area managed under Public Spaces Protection Orders - East Devon will be considered on its own merits at the application stage. Where trading consent is subject of anti-social behavior and/or breaches of a PSPO, the council reserves the right to revoke trading consent and to refuse future trading consents.
  - Street trading requests for locations in Cranbrook will be considered on their merits. Emergence of issues including the growth of the town and transport identified that most roads are unsuitable for the purposes of street trading. Cranbrook is a designated healthy New Town (HNT) and that status is recognized by Licensing when receiving applications in the town. East Devon District Council and Cranbrook Town Council have prepared guidelines when considering new applications (see document Policy Guidelines – Cranbrook).
- 6.20 In certain circumstances and for larger events or markets, it may be necessary for a road closure order to be obtained by the event organiser to mitigate risks to safety.

#### **STAGE 4 – INSPECTION OF STREET TRADING UNIT**

- 6.21 The vehicle, van, trailer, stall or other device to be used for the proposed street trading activity may be inspected by an Authorised Officer of the Council, prior to the determination of any street trading consent. The unit to be used for the street trading activity shall comply in all respects to the legal requirements relating to the type of street trading activity proposed. In particular the proposed business shall comply with the following legislation;
- Food Hygiene (England) Regulations 2013
  - Food Safety Act 1990 and any Regulations made under this act
  - Health and Safety at Work etc. Act 1974 and any Regulations made under this Act.
  - Environmental Protection Act 1990.
  - Control of Pollution Act 1974
  - Anti-social Behaviour, Crime and Policing Act 2014
  - The Modern Slavery Act 2015
  - Immigration Act 2016

Further advice on any of the above requirements can be obtained from Environmental Health Teams by emailing [environmentalhealth@eastdevon.gov.uk](mailto:environmentalhealth@eastdevon.gov.uk).

- 6.22 Evidence of compliance with any legal requirement may be requested by the Council at any time.

#### **STAGE 5 – CONSIDERATION OF APPLICATIONS**

- 6.23 Any comments received from the consultation process which are relevant will be taken in to account as part of the consideration of the application at this stage.
- 6.24 The criteria listed below will be used to consider whether or not an application should be approved. All the criteria should normally be satisfied, and equal weight will be applied to the criteria listed. Each case though will be assessed on its merits and individual circumstances, where appropriate, may be taken into consideration;

##### Site safety

- 6.25 The location of the proposed street trading activity should not present additional risks to the public in

terms of road safety, obstruction and fire hazard. The term “public” refers to both customers frequenting the street trading activity, and other members of the public using the location. In particular reference will be made to the guidelines set out in Stage 3 on site safety assessment criteria and observations made by the Highways Authority. Trading consent should not be granted where there is insufficient space, undue interference to pedestrians/road users, where the existence of trading will cause heightened risk or where it would be prejudicial to highway safety.

#### Public Order

- 6.26 The street trading activity should not present a risk to public order in the locality in which it is situated. Observations from the Devon and Cornwall Police will be taken into consideration under this heading. Traders will conduct themselves in a professional manner, having respect for, and treating other traders, council staff and the public fairly and courteously.

#### Avoidance of Annoyance

- 6.27 The street trading activity should not cause annoyance from noise, smells, fumes or litter to households, ~~and~~ businesses and public land in the vicinity of the proposed street trading site. Observations from Council’s Environmental Health Teams shall be taken into consideration under this heading.
- 6.28 Generators may be used or permitted at some locations. Where use of a generator is sought at a trading site the application will require details of the noise rating, the fuel type and the storage arrangements and conditions may be imposed to control their use.

#### Conflict with other like trading outlets and school premises

- 6.29 The presence of other like trading outlets and proximity of schools shall be taken into consideration as follows:
- The Council will not normally permit a new consent for the sale of goods or services which conflicts with those provided by nearby traders (whether street trading or in business premises).
  - Factors include the articles for sale and the geographical location of the proposed site. Each application will be considered on its own merits and on a case by case process.
  - Mobile food vendors will not normally be permitted to trade within 500m of a school during the school opening hours.
  - On lay-bys there shall only be one street trading consent granted.

#### Compliance with Legal and Environmental requirements

- 6.30 The proposed street trading activity should be carried out from a trading unit that complies with the relevant legislation. Observations made on the compliance with the requirements of Food Safety and Hygiene, Health and Safety, Environmental Protection and fire safety legislation shall be taken into consideration.
- 6.31 The impact of the proposed street trading activity on the local environment including street surfaces, power supply, coastal and inland waters, carbon footprint, supply chain, packaging, waste minimisation, waste disposal and waste generated by customers. Provision of adequate measures to minimise the environmental impact of the proposed operation.
- 6.32 The Council Plan for 2020 to 2024 highlights key priorities, principles and values including working towards reducing our carbon footprint and enhancing our environment, along with supporting initiatives that promote the health and well-being of our residents. The Licensing team works in support of the Council Plan noting the potential impact to the environment from time limited, outdoor licensed events and will expect applicants to be familiar with initiatives that reduce and mitigate the impact upon the environment. For example the relevance of avoiding of single use plastic drink containers, avoidance of materials that have a detrimental effect to the environment and similar initiatives. The use of biodegradable materials and packaging wherever possible not relying on single use plastics in support a reduction in plastic waste.

### Permitted Trading Hours

- 6.33 All street trading consents will normally be limited to daily trading hours between 8.00 am and 10.00 pm. However in the case of hot food takeaways and fresh produce sellers trading hours will be determined on a case by case basis on their own merits. Any trading between 2300 – 0500 hours must be subject to a separate application under the Licensing Act 2003 where hot food and drink is proposed to be sold.
- 6.34 The Council retains the right to specify permitted hours of trading that are less than those applied for if local circumstances require it.

### Compatibility of the proposed street trading operation

- 6.35 The proposed trading operation should complement the trading area in which it is situated and/or be compatible with the character of the event to which the consent is related. In assessing this criterion consideration should be given to the type and nature of locality, the type of street trading that will be carried out and the visual appearance of the trading operation being proposed (including any associated equipment or structures). Consents should not be granted when there already exists sufficient retail outlets in the area.
- 6.36 The stall or vehicle must be maintained in good condition, smart appearance and meet criteria, including size, laid down in the standard Consent conditions. Photographs including dimensions, must be provided with all new applications and requests for approval of changes to or replacement of a stall or vehicle. The general appearance of the vehicle or stall will also be considered in order to determine that the unit will not detract from the appearance of the surrounding area. A trading or towing vehicle must be compliant with DVSA MOT standards being maintained in a roadworthy condition to include tax and insurance.

### Avoidance of duplication

- 6.37 Street Trading has the potential for the overlapping of trading activities covered by different regulatory regimes and services within the Council, for example food charitable collections, sale of alcohol or late night refreshment. In addition, street trading activities may require Planning, Highways or land owner permissions depending on the nature of the trading location. So far as is reasonably practicable the Council will avoid duplication with other regulatory regimes that already place obligations. Street traders are required to ensure all relevant provisions are satisfied with the relevant responsible authority in these respects.
- 6.38 Pavement licences require a separate application, approval and fee procedure.

### General

- 6.39 Refusal or withdrawal of street trading consents will be normal in the following circumstances where:
- (a) There are not enough suitable street trading locations available in the street for the applicant to engage in the trading in which they desire without causing undue interference or inconvenience to persons using the street.
  - (b) There are already enough consent holders or people employed by them trading in the street from shops or otherwise, in the goods in which the applicant desires to trade.
  - (c) A consent holder or people employed by them have failed to comply with the conditions attached to any consent.
  - (d) The street trading may damage the structure or surface of the street.
  - (e) Adverse comments are received from the statutory organisations which cannot be overcome.
  - (f) The imposition of conditions is not adequate to control potential problems.
  - (g) Extreme weather conditions when street trading may present a risk to the applicant, their staff or other people.
  - (h) There has been the selling of psychoactive substances.

### Varying a consent

- 6.40 The Act gives the council the power to vary the conditions attached to a consent at any time. Should the holder of a consent wish to change any of the conditions on their consent, they can, at any time, submit a written request to vary the consent. This would be required where the consent holder wishes to change the operating days and/or times or from a different location. A fee will apply to the variation.

- 6.41 The Council will determine a request to vary a condition or conditions in the same way it would consider a new application by carrying a consultation and making a decision based on the criteria listed in this policy.
- 6.42 There is no provision for transferring a street trading consent in the Act.

## **STAGE 6 – DETERMINATION OF APPLICATION**

- 6.43 Applications will be determined by officers under delegated authority, although officers have the absolute discretion to refer any application to the Licensing and Enforcement Sub-Committee.
- 6.44 Where there are relevant objections then officers will be permitted to try and overcome the objections through negotiations with the relevant parties and the applicant.
- 6.45 Where the decision of the officers is to refuse an application or grant it in terms substantially different than applied for (in this regard a change to the hours will not normally be viewed as substantial), the applicant will have the right to request a review of that decision by a more senior officer by making a written request within 10 working days. The review will be completed and the applicant notified of the outcome within 10 working days of the request.
- 6.46 The applicant and anybody objecting to the application will be notified of a referral to the Sub-Committee, the date when the application will be considered and the procedure to be followed. The appropriate Ward Member will also be notified. Unless special circumstances apply the Sub-Committee meetings are open to the public.

### Outcome

- 6.47 The reasons for refusal (whether a decision made by officers or the Sub-Committee) will be conveyed to the applicant. There is no right of appeal to the Magistrates' Court against the Council's refusal to issue a consent.
- 6.48 In respect of any application which is approved the Standard Conditions will be attached to the consent, together with any other conditions deemed to be necessary. Conditions will require the street trading operation to be carried out as detailed in the application (e.g. the nature of the goods to be sold, trading hours / days and the unit from which they are to be sold).
- 6.49 Conditions attached to the consent form part of the approval to carry out street trading in East Devon. They **MUST** be complied with at all times and failure to do so could lead to the consent being either revoked or any subsequent application not granted. It is the responsibility of the applicant / consent holder to familiarise themselves with the conditions relevant to their consent and to abide by them.

### **Enforcement**

- 6.50 The Council has a duty to carry out enforcement where it becomes aware of or receives allegations which concern unauthorised trading (trading in a street without first obtaining a consent) or non-compliance with street trading consents that have been granted.
- 6.51 The Council will actively enforce the provisions of this Policy and street trading within its area in a fair and consistent manner. In doing so all enforcement activities will comply with the Council's [Regulatory Enforcement and Prosecution Policy - Principles of Enforcement - Policy - East Devon](#) The Council may at any time revoke a consent or vary the conditions of an existing consent where there are reasonable grounds for so doing.
- 6.52 Consent holders should allow access to authorised officers of the Council and Police Officers at all reasonable times. Council officers will carry with them and produce on request official identity cards issued by East Devon District Council. If you have any doubts about a person claiming to be from East Devon District Council ask to see their official identification card. If you remain uncertain please contact the Council on 01404 515616 to confirm the identity of an employee.

6.53 East Devon District Council has an agreed [Complaints procedure](#) for dealing with complaints about the services it delivers.

## **Cranbrook**

### Introduction

- 6.54 East Devon District Council is the licensing authority for street trading and Cranbrook Town Council will be consulted when applications for new licences or renewals come forward.
- 6.55 East Devon District Council's policy statement is to create a street trading environment which complements premises-based trading, is sensitive to the needs and amenities of residents, provides diversity of consumer choice and seeks to enhance the character and ambience of local environments.
- 6.56 Town Council experience to date has identified that there are a number of issues which have emerged in connection with previous consultations. These include the fact that the Main Local Route (MLR), now experiences increased vehicle movements including more buses per hour, is unsuitable as a street trading location and that no applications on the MLR could be supported and the fact that residential (in parcel) streets are generally narrow and are unsuitable as locations for street trading. Equally, street trading in residential parcels is likely to lead to impacts on residential amenity. These factors were confirmed by East Devon District Council and the Town Council in December 2019.
- 6.57 Cranbrook is a designated Healthy New Town (HNT) and one of ten NHS pilots. The basic aim of the HNT project was to reduce the impact on the NHS by encouraging lifestyle changes leading to a healthier population. Whilst it is an argument that people should have a choice about what they purchase and consume, the reality is that the pressures on the NHS created by unhealthy lifestyles is unsustainable. Cranbrook Town Council therefore takes the view that health and lifestyle considerations are material in this context.
- 6.58 In considering the balance of established shops and street traders, it is noted that the number of take-away premises in existing shops is limited by planning condition to no more than two. The Town Council therefore takes the view that the number of street trading permissions should be commensurate with this restriction.

### Guidelines

- 6.59 Both the District and Town Council will consider each individual application on its merits. The Street Trading Policy adopted by the District Council includes criteria listed under 'Stage – 5 Consideration of Applications' that allow licensing officers to accept relevant factors received from the consultation process. The current criteria includes:
- Site Safety
  - Public Order
  - Avoidance of Annoyance
  - Conflict with other like trading outlets and school premises
  - Compliance with legal and Environmental requirements
  - Permitted Trading Hours
  - Compatibility of the proposed street trading operation

### General Factors

- 6.59 Emergence of the issues identified in this report may add further weight to the Stage 5 criteria already listed in the Street Trading policy providing further grounds to refuse approval of an application. Where any of the following factors sit outside the Stage 5 criteria, due consideration will still be given by licensing officers. The following factors will be taken into consideration:
- 6.60 Location
- Is there enough space for the applicant to trade in the manner proposed without causing undue interference or inconvenience to persons using the street?
  - How many traders are already trading in the vicinity (from shops or other stalls) in the type of goods in

which the applicant desires to trade?

- Is there undue concentration of traders trading in the street in which the applicant desires to trade?

#### 6.61 Residential Amenity

- Will the consent, if granted, result in nuisance to members of the public, residents and local businesses due to the likely noise, smell, litter, disturbance or other problems which will be caused by granting the consent?

#### 6.62 Highway Safety

- Is the proposed location on a main local route and likely to result in highway obstruction?
- Is the proposed location likely to result in highway obstruction caused by parking of customers' vehicles?
- Is the size, nature or appearance of the proposal (and any associated signage or equipment) appropriate for the proposed location in terms of amenity or public or highway safety?

#### 6.63 Economic considerations

- Are the proposed trading hours outside the usual business hours of shops in the vicinity?
- How close is the proposed location to established shops trading similar goods?
- Would the proposal lead to the number of traders exceeding the number of permitted established shops trading in similar goods?

#### 6.64 Health Considerations

- Is proposal consistent with the aspiration of Cranbrook as a Healthy New Town?

#### 6.65 Operating History

- Is there a history of complaints or any other issues which might impact on a decision to grant or refuse an application?

#### 6.66 Potential acceptable sites

- Town Council may wish to work with the Licensing Authority in identifying potential sites which may be acceptable as venues for street trading. In doing so, it is proposed that this be based on the provision of services to those parts of the town which are not as well served because they are located remotely from established services, are sufficiently removed from existing established providers to mitigate unfair competition and are situated away from locations which might give rise to highway or amenity issues. For example, until the town centre comes forward there may well be locations in that part of the town which are acceptable in all respects and meet the needs of residents. Such potential locations may have a lifespan and require revision as the town builds out.

## 7 Appendices

### Street Trading Application Fees East Devon District Council

Application Fees		
Application fees are non-refundable, being the administrative payment to the Council to receive, review and start consultation. Payment will be required when submitting each application to Licensing using the online portal		
<b>New Consent to Trade</b>	<b>£45</b>	Payable for each location.  When applying for more than one location, an additional fee of £45 for each location.
<b>Renewal of Existing Consent upon Application</b>	<b>£45</b>	When applying for renewal (previously granted location).  Where an application is sought for any new location the fee payable is that for a new application (above).
<b>Application for Block Booking (multiple trading)</b>	<b>£45</b>	Payable for any public area, highway or open space (not falling under EDDC ownership).  *Fees for hiring any EDDC gardens or open spaces to hold an event will incur a charge payable under <a href="#">Event Fees 2022/2023 - East Devon</a>
<b>Variation</b>	<b>£25</b>	If applying to vary an existing Consent for the same unit/vehicle in the existing granted location.
<b>Late submission (Traders List)</b>	<b>£25</b>	Provided late as part of an application at least 10 working days prior to the event commencing.

#### Additional Notes:

- a) Fees are payable where trading in any location where the public can access freely.
- b) Fees will be reviewed annually and any variation will be approved by Council
- c) \*This fee will be charged by StreetScene for land hire (owned by EDDC).
- d) **Fees are none refundable once the consultation processes has been started.**

## **Relevant Convictions**

### **Determining suitability of an applicant for street trading consent**

Each case will be decided on its own merits. Although an applicant may have convictions that would fall under the guidelines in this policy, the Council will always consider the full facts of the case and any mitigating or other circumstances before reaching a decision. The overriding consideration is the safety of the public.

### **Dishonesty**

A street trading consent will not be granted unless 4 years have lapsed since a conviction for an offence that involves dishonesty, for example theft or fraud, or completion of any sentence imposed whichever is the later.

### **Violence**

If an applicant has been convicted for an offence for violence which involves loss of life, a street trading consent will not be granted. In other cases a street trading consent will not be granted unless 10 years have lapsed since a conviction for an offence relating to violence or completion of any sentence imposed whichever is the later.

### **Drugs Offences**

A street trading consent will not be granted unless 10 years have lapsed since a conviction relating to the supply or importation of controlled drugs or completion of any sentence imposed whichever is the later. A Street trading consent will not be granted unless 5 years have lapsed since a conviction for an offence relating to the possession of drugs or completion of any sentence imposed whichever is the later.

### **Sexual and Indecency Offences**

A street trading consent will not be granted where there are convictions for rape, indecent assault, any sexual offence involving children and any conviction for an offence under the Sexual Offences Act 2003, or for indecent exposure.

### **Exploitation**

A street trading consent will not be granted if there are convictions relation to exploitation of another individual. This will include slavery, child sexual exploitation and grooming.

### **Motoring Convictions**

In most cases, motoring offences are unlikely to be relevant when considering a street trading consent application. However, there may be instances where the offences are of a very serious nature or may be relevant to the type of street trading activity. In those cases a street trading consent will not be granted unless 5 years have lapsed since any such convictions or completion of any sentence imposed whichever is the later.

### **Street Trading Legislation**

The Council takes a serious view on applicants who have been convicted of street trading offences under Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982. In particular, a street trading consent will not be granted unless 2 years have lapsed since any offence under the 1982 Act or if there is more than one conviction unless 5 years have lapsed.

### **Formal Cautions and Fixed Penalty Notices**

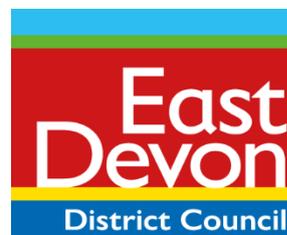
For the purposes of these guidelines, the Council will treat Formal Cautions issued in accordance with Home Office guidance and fixed penalty notices as though they were a conviction before the courts.

### **Existing Consent Holders Convicted Of An Offence**

The Council may consider revoking the consent if the consent holder is convicted of an offence and in particular there will be concern if the offence falls into one of the categories detailed above.

# STREET TRADING CONSENT

## STANDARD CONDITIONS & TERMS



### STANDARD CONDITIONS

1. A copy of this consent shall be displayed by the consent holder in a conspicuous position that is visible to members of the public and shall be produced for inspection if requested by an authorised officer of the Council or the Police.
2. In the case of a block consent where the application did not contain all of the required information for all stalls, it is the responsibility of the consent holder to ensure that the Council has given its written approval to all stalls prior to the event commencing.
3. The consent holder shall comply with all relevant legislation applicable to the street trading activity and ensure that where applicable the consent holder has and maintains a current Food Hygiene Rating Scheme score of at least 3 and gas safety inspection certificate.
4. The consent holder must notify the Licensing Manager immediately of any convictions or proceedings arising out of the consented activity.
5. The consent holder shall not assign his interest in this consent or any part thereof nor allow any person or trading unit, other than a person employed to assist the holder, to rely on it.
6. The consent holder shall observe and comply with any directions in relation to the consented activity or use of the street / public place by a duly authorised officer of the Council or the Police.
7. The consent holder shall for the duration of the consent maintain a valid Third Party Public Liability Insurance Policy for a minimum of £2,000,000 to the satisfaction of the Council and shall produce a valid certificate of such insurance at any time upon request by an authorised officer of the Council.
8. This consent does not imply or grant exclusive rights to the holder for use of the location specified in the permission. If at any time at the permitted trading location other statutory bodies or organisations require access and use of the location to carry out emergency or other remedial works, they shall be afforded such access for such time as is necessary.
9. The consent holder shall not carry out any street trading activities other than those permitted by the consent and is expressly prohibited from;
  - (i) selling Psychoactive Substances,
  - (ii) holding an Auction Sale
  - (iii) selling, displaying or wearing any article which is or is intended to be offensive either in writing or pictures.
10. The consent holder shall not trade outside of the permitted location / route and the permitted times and days.
11. The consent holder shall not trade in such a way that is likely to cause;
  - (i) undue obstruction to any part of any street or public place, or
  - (ii) injury to any person using the street or public place, or
  - (iii) damage to any property in the street or public place, or
  - (iv) annoyance to persons using the street or public place, or occupiers of premises in the vicinity.
12. The consent holder shall at all times conduct their business in a clean, honest, civil and businesslike manner so as not to interfere with the business of other traders and consent holders.
13. Music may be played subject to having appropriate PRS and PPL licenses provided that the music

shall not be audible outside the vehicle or beyond the boundary of the consented area without prior consent in writing from the Council.

14. The consent holder shall not place on the street or in a public place any furniture or equipment other than as permitted by the Council and he must maintain the same in a clean and tidy condition and not place them so as to obstruct the entrance or exit from any premises.
15. Outside of the consented area the consent holder shall not place on or in any street or public place, or affix to any equipment placed on the street or public place, any advertising of any description whatsoever except with the prior consent in writing from the Council
16. At the expiry of the consent, all stalls, vehicles or other equipment associated with the street trading activity must be removed within 30 minutes of the expiry of the trading hours.
17. The consent holder when operating on a static site shall have access to suitable and sufficient sanitary accommodation for anyone carrying out the street trading activity.
18. With respect to litter and waste the consent holder shall;
  - (i) provide and maintain refuse receptacles for litter and shall remove waste arisings from the site on a daily basis and dispose of them in an approved manner,
  - (ii) keep their trading position and the area within 25m of the pitch in a litter free condition during the permitted hours and also leave the same in a litter free condition at the end of each daily period permitted by this consent,
  - (iii) make such provision as is necessary to prevent the deposit in any street or public place of solid or liquid refuse and shall not discharge any water or effluent from the street trading activity to street surface drainage or other watercourse.
19. Consent holders must notify the Licensing team of any variation to trading times or frequency, including absence in excess of 4 weeks. The reasons for any absence will be treated according to the individual circumstances provided.
20. The Council reserves the right to withdraw consent at any time should the land be required by the land owner. The requirement of the landowner approval is specific to this consent being in place.
21. The Council reserves the right to withdraw consent at any time should new development surrounding the trading location impact on the suitability of the location.
22. Should a gazebo or marquee be permitted by the Street Trading Consent and used by the Consent holder the following conditions apply:
  - i. Heavy ballast weights must be used at each leg to withstand uplift forces from wind. Calculations from the manufacturer, supplier or installers to show the weight requirements for each leg must be obtained and complied with.
  - ii. Anchorage should also prevent lateral movement of the structure. Ropes to anchorage points must not obstruct movement around or within the structure
  - iii. The Consent holder should be aware of the design wind load of the structure, and have a procedure for monitoring weather forecasts, and making safe by removal of covers any structure likely to be put at risk by high winds
  - iv. The structure must be British fire-rated BS 5438 and/or BS 7837 (or any replacement standard) and marked accordingly, the Licensee must carry out a fire risk assessment of the structure.
  - v. Domestic garden gazebos and old style market gazebos cannot be accepted as they are not structurally safe for use in public areas.
  - vi. Gazebos/stall coverings/marquees must be kept visually appealing and compliment the character of the area
23. All drinks served for shall be served in reusable Plastic/Polycarbonate or similar containers, no glasses or bottles are to be permitted.
24. The Consent holder must ensure that the area where the street trading activity takes place is kept clean and clear of refuse and litter throughout the operating times. Refuse and litter deposited on the highway in the vicinity of the street trading unit/s and other objects must be removed at the Consent holder's expense under the Environmental Protection Act 1990. The Consent holder must ensure that the street surfaces are kept clean at all times and should have particular regard to the

removal of grease, fat deposits and similar to ensure that the surface does not present a hazard to users.

25. It is a condition of this Consent that clear routes of access around the street trading unit and the highway must be maintained, taking into account the needs of disabled people, and the recommended minimum footway widths and distances required for access by mobility impaired and visually impaired people as set out in Section 3.1 of <https://www.gov.uk/government/publications/inclusive-mobility>. The Licensee must comply with the Guidance of the Secretary of State with regard to the needs of disabled people and the recommended distances required for access by disabled people, such guidance being shown at the following address or such other updated guidance as may be issued <https://www.gov.uk/government/publications/pavement-licences-draft-guidance/draft-guidance-pavement-licences-outdoor-seating-proposal>

## **VARIATION OF CONDITIONS**

The Council may vary any of the conditions attached to a consent or add new conditions at any time, subject to reasonable notice being given to the consent holder.

## **REVOCAION OR SURRENDER OF CONSENT**

This consent may at any time be revoked by the Council or surrendered by the consent holder.

The holder shall return this consent to the Council immediately on revocation or surrender of the consent. The Council shall not in any circumstances whatsoever be liable to pay any compensation to the holder in respect of such revocation.

## **LEGAL PROVISIONS**

Nothing contained in these conditions shall relieve the consent holder or his employees or agents from any legal duty or liability and the consent holder in carrying out the consented activity agrees to indemnify the Council in respect of all claims, actions, demands or costs arising from this consent.

## Currently designated as Prohibited Streets

It is proposed to change the designation of the following Prohibited Streets (where street trading is at all times forbidden by law) to designate as Consent Streets;

- All Saints Road
- Bedford Square and including the un-named street leading from Bedford Square to the Esplanade
- Blackmore View
- Chapel Road
- Chapel Street
- Church Street
- Coburg Road - between Coburg Terrace and Church Street
- Dove Lane - and the lane between Dove Lane & New Street
- Fore Street
- Fortfield Place
- Fortfield Terrace
- Glen Road, - south of Manor Road
- Ham Lane and East Street - from the Esplanade to Fore Street
- High Street
- King Street
- Manor Road
- Market Place
- Mill Street, - west of its junction with Russell Street
- Millford Road, - north of the ford
- New Street
- Old Fore Street
- Peak Hill Road – east from its junction with Cotmaton Road.
- Prospect Place
- Radway, - south of the Post Office
- Salcombe Road
- Sid Road, - south of Redwood Road
- Station Road - between Knowle Drive and The Esplanade
- Streets adjoining the Three Cornered Plot (Known as The Triangle)
- The Beach – from the mouth of the River Sid westwards to a point opposite Clifton Cottage.
- The un-named street between Elizabeth Hotel and Marlborough Hotel (now Dukes)
- Vicarage Road, - south of Connaught Road
- York Street
- Vicarage Road, - south of Connaught Road

**The following is a Consent Street but shall only be granted during a period annually from 1<sup>st</sup> May to 1<sup>st</sup> September;**

- Esplanade & Promenade

Report to: Licensing and Enforcement Committee

Date of Meeting 15 March 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A




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## Committee Update - Licensing Act 2003, Gambling Act 2005, Taxis & General Licensing

### Report summary:

The report provides an update on the activities of the Licensing Service under the Licensing Act 2003, Gambling Act 2005, Taxi legislation and General Licensing including Street Trading and Pavement Licences

Is the proposed decision in accordance with:

Budget Yes  No

Policy Framework Yes  No

### Recommendation:

That the report be noted

### Reason for recommendation:

To keep the Council's statutory committee up to date with current arrangements relating to the Licensing Service

Officer: Steve Saunders, Licensing Manager (Governance and Licensing)

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Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

**Equalities impact** Low Impact

**Climate change** Low Impact

**Risk:** Low Risk;

**Links to background information**

Link to [Council Plan](#)

Priorities (check which apply)

- Better homes and communities for all
- A greener East Devon
- A resilient economy

## Report in full

### 1 Licensing Act 2003

#### 1.1 Applications Received, Licences Issued and Notices Given

- 1.1.1 This report informs the Committee with regard to any strategic or national updates for each area of licensing work covering the period from December 2022 to March 2023. New applications are being received although the Institute of Licensing has reported that businesses continue to struggle with the combination of high energy, labour, food and drink costs.
- 1.1.2 The first months of 2023 saw applications submitted for upcoming festival events occurring across the district this year. At the time of preparing this report, 25 premises applications were being processed, being for new licences, festivals and existing businesses transferring or varying existing licences. Ongoing communication with event organisers indicates a number of applications are still anticipated for festivals being planned in the summer months.

#### 1.2 Hearings

- 1.2.1 Licensing officers arrange mediation if appropriate when representations are received for applications and there was one contested application over the previous period.
- 1.2.2 A Licensing sub-committee hearing occurred on 7<sup>th</sup> March for a new premises licence for an off-licence business in Exmouth, for which the outcome is not known at the time of preparing this report.

### 2 Gambling Act 2005

#### 2.1 Applications Received, Licences Issued and Notices Given

- 2.1.1 The Gambling Commission circulates a regular bulletin for licensing authorities outlining changes in legislation and any enforcement action taken. The latest bulletin has not been circulated by the Commission at time of preparing this report, the previous bulletin can be viewed online at [December LA Bulletin \(campaign-archive.com\)](https://www.campaign-archive.com).
- 2.1.2 Government proposals to reform the Gambling Act 2005 (the Act) are still awaited after the Dept for Digital, Culture, Media & Sport (DCMS) launched a review of the Act in 2020.

### 3 Taxis

#### 3.1 Applications Received and Licences Issued

- 3.1.1 Officers continue working effectively by issuing licences upon receipt of fees and all relevant documentation. The latest figures show small variation in taxi and private hire licences for this licensing authority going in to year 2023:

Year	Taxi Driver Licences	Taxi Vehicle Licences	Private Hire Drivers	Private Hire Vehicles	Private Hire Operators
2016	206	170	22	18	15
2017	195	165	26	20	13
2018	179	161	30	24	16

2019	162	148	37	31	20
2020	155	126	40	32	18
2021	156	129	41	37	19
2022	153	135	52	40	22
2023 (March	147	130	50	37	21

- 3.1.2 Officers have previously reported an increase in mandatory checks to assess applications against the 'fit and proper' test under requirements introduced by HMRC and the DoT last year. Officers now complete checks of the National Revocation (NR3) register too.
- 3.1.3 Driver criminality checks that were previously necessary every three years now require Disclosure and Barring Service (DBS) checks every six months and the council's taxi policy was revised in accordance with the national statutory standards. The need for drivers renewing their DBS certificates was also compounded when temporary adjustments to right to work checks introduced in 2020 ended in the late stage of 2022. At the same time, Home Office guidance to Licensing Authorities made it a requirement to check the DBS identity in person with the original documents for all taxi and private hire licence holders and applicants. These changes have imposed increased checking by officers at both council offices along with the impact on individuals renewing licences being reported back to staff.
- 3.1.4 The process to complete a full enhanced DBS check requires drivers to complete the online application form, to pay the fee and to visit the office with three original valid ID documents enabling officers to approve identification and to countersign and submit each DBS application. Applicants are then taking up the option to register with the DBS update service which then negates need to check all documents on the checks being made every six months.

## 3.2 Enforcement

- 3.2.1 The licensing team records and investigates complaints received from the public and reported by other drivers which is recognised as an effective procedure by the DoT..
- 3.2.2 Three complaints of significance have been reported and investigated by officers over the previous period, one remaining under investigation currently. In December a complaint was received from a passenger in Exmouth regarding inappropriate conversation by an unidentified taxi driver. Officers followed up all possible enquiries with the complainant and have been unable to identify the driver or vehicle involved.
- 3.2.3 In January a further complaint was reported by passengers collected from an Exmouth taxi rank regarding the manner of driving and behaviour of the driver when passengers remonstrated. Further investigation followed which has not identified the taxi involved.
- 3.2.4 There was considerable speculation on social following the matter reported under 3.2.2 and the Chair of this committee helpfully provided informative updates to anyone seeking to report that incident or other incidents in the future.
- 3.2.5 The EDDC Communications team also circulated information for the press and the public to highlight awareness. Officers have prepared information on the licensing web pages to inform the public when [Catching a taxi safely - East Devon](#).
- 3.2.6 Officers are also in the final stages of testing and introducing an online reporting tool that will shortly allow incidents to be reported online in addition to contacting by telephone or email.
- 3.2.7 It is important to recognise that the vast majority of East Devon's licensed drivers continue to operate with the level of professionalism required and those who continue to maintain high standards do not wish for incidents of this type to occur.

## 3.3 Hearings

3.3.1 During the previous period it was necessary to convene a Licensing sub-committee hearing for private hire related application for a vehicle to be licensed outside the Council's Taxi and Private Hire policy for vehicle age. The application was given all due consideration and was granted as being considered an exceptional vehicle being suitable for licensing.

### **3.4 Proposed Policy changes**

3.4.1 Officers have reported the need to revise the council's Taxi and Private Hire policy this year with that work already being undertaken to prepare a draft policy that will be reported at a future meeting of this Committee.

3.4.2 The Committee will be aware of various changes and implemented nationally by the Government and DoT regarding vehicle licensing. The changes will be included in the revised Councils Taxi and PH policy due to be reviewed and it will then be necessary to consult fully with the licensees, with all authorities and the general public.

### **3.5 Meeting between Councillors, Taxi Proprietors and Officers**

3.5.1 Previous meetings took place at the council offices and the forum has provided helpful communication with the taxi trade on key subjects. The forthcoming review of the Taxi and Private Hire Policy and the need for consultation will be an appropriate time to arrange a meeting later this year. With the Council's elections being due in May and with the timeframe to draft the Taxi and Private Hire Policy, officers will consider the next meeting for a date to be fixed.

### **3.6 National Revocation database (NR3).**

3.6.1 Officers have previously reported on this authority signing up to the National Revocation licensing database (NR3). Checks of the database are completed for new driver applicants and those renewing driver licences.

3.6.2 In February a check revealed a driver currently licensed with this authority had been entered on to the database by another licensing authority. Officers followed up with checking the circumstances with the other authority establishing that it was a historic and procedural matter that does not call in to question the fitness of the driver to continue holding a licence here in East Devon.

### **3.7 Taxi Tariffs Fares**

3.7.1 Officers previously reported on the delivery of a new fare tariff which this Committee has approved and now in being. Taxi proprietors have been notifying officers over the previous period after updating vehicle meters and adopting the new fares tariff that is in place.

## **4. General Licensing – Street Trading Consents**

### **4.1 Applications Received Street Trading Consents Issued**

4.1.1. This council adopted policy in 2017 for the current street trading regime and a further report today refers to reviewing the policy.

## **5.1 Temporary Pavement Licences (Business & Planning Act 2020)**

- 5.1.1 The extension that allows business to apply to the Licensing Authority to place tables and chair on public highways has been extended for a further year until 30 September 2023 which means there are still two regimes that businesses can apply for, being the temporary 'fast track' arrangements that District Councils administer since 2020, alongside the continuing regime for pavement licences the County Council has held the responsibility for many years.
- 5.1.2 There are information gaps regarding the timing of the transition and need for new guidance when the law changes this year. Devon County Council administers 26 [Current Pavement Licences](#) for businesses across East Devon issued under the 1980 powers. There are 3 Pavement Licences administered by this authority currently.
- 5.1.3 Officers will continue to keep developments under review and will update this Committee due to the likelihood of implementing new policy, fees and procedures later this year.

## **6. Councillor Training and Elections**

- 6.1. Training was provided for Licensing and Enforcement Committee Members in 2019 delivered by leading expert, Phillip Kolvin QC who attended locations in the South West.
- 6.2 Training is mandatory to provide sufficient understanding for Members to determine contested applications at licensing sub-committee hearings and to withstand any challenges upon appeal.
- 6.3 Training opportunities have since been offered by the Institute of Licensing for Councillors up to last year being delivered and attended virtually through Zoom. Further training opportunities will be identified and considered to support the pool of trained Councillors that can sit on hearings following the forthcoming local elections.
- 6.4 The [Licensing Act 2003 Councillor's handbook \(England and Wales\)](#) is also an informative briefing that was updated last year.
- 6.5 The licensing manager wishes to thank the Chair, Vice Chair and Members of this Committee for their engagement in the field of licensing and for all the support provided to the licensing team.

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### **Financial implications:**

There are no finance implications

### **Legal implications:**

There are no legal implications requiring comment