



## **Street Trading - Designation of Streets**

### **Response by Oxford Streets for People and Headington Action**

We are responding to the proposed changes on behalf of two organisations:

*Oxford Streets for People*, a group within the Oxford Civic Society which is promoting street parties as a means of community development;

*Headington Action*, an 'umbrella' group of Headington organisations which, amongst other things, runs the Headington Farmers market and Headington Festival.

We wish to make the following comments:

We appreciate that the change is being made to regularise the consent process across the city and to control undesirable activities. But we infer that the level of cost is set for revenue raising purposes (the current charge of several thousand pounds for an annual licence is clearly not related to the Council's administrative cost).

The proposed change will have little impact on street parties, as most street parties do not include any form of trading. However, organisers of some street parties may wish to raise small amounts of money to cover costs by selling, for example, cakes or to raise money for charity. It will be regrettable if the proposed cost, and associated paper-work, prevents such beneficial activity.

We are unsure how the proposed changes will apply to farmers' markets. The levy may have an impact on a market's viability – particularly those such as at Headington which are community organised.

We note that the purpose of the policy is to regulate the location and number of street traders and prevent the obstruction of the streets so that the activities do not cause nuisance or annoyance to the people in the area. It is not necessary to regulate community supported markets and festivals further as these activities do not relate to the purpose of the policy. Therefore, we ask that the proposal does not relate to small scale one-off community activities in streets. We see no justifiable reason why the Council should attempt to raise revenue from such community activities. If it is argued that the cost is applied to cover the cost of consent administration then we suggest such cost is best avoided by dispensing with the process! A key principle of regulation is that it must be proportionate – to regulate these activities is not proportionate.

We note that a street trading consent will require the approval of not just the City Council but the Highways Authority, Nightsafe, Oxfordshire Fire & Rescue Service, the Planning Authority at the City Council and Thames Valley Police. We assume the City Council will be the sole point of contact to obtain such consent.

We have been informed that events such as the Headington Festival will also fall into the category of needing a trading licence. This is odd; parks are not streets, trading activities in parks are already regulated and significant charges are already levied. We can see no case for adding more cost and more paper-work to park-based events. Already we are aware that some park events do not take place because the organisers find the process too burdensome. We ask that street trading consent regulations do not apply to park-based events and the whole process for park-based events is examined to make it simpler.

We note that you intend to consult with local residents and retailers when you receive an application for consent. What mechanism are you going to use? Will it be the same process which Planning uses, which allows interested parties to receive an alert for any application within x meters of their home? We will be very concerned if the consultation process involves the applicant in further bureaucratic processes.

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