

**APPENDIX 3****Summary of changes from previous policy version 1.0****Section 3 – Policy****Sub Section 3.1 – Policy Principles**

Minor rewording to combine 7 into 6 ‘Policy Principles’.

**Sub Section 3.2 – Policy Responsibility**

Policy responsibility point reworded to state that the Business Growth Manager will make copies of the latest policy available on request. The policy document is no longer made available on the website. This is in line with the publication of other Council policy documents.

Further point reworded to detail where other Council departments will be notified or required to take enforcement action, when receiving complaints in relation to town centre trading activities. The Business Growth Manager is responsible for enforcement where a trader may be in breach of ‘permit conditions’, whereas those in Public Protection teams will be required to lead more formal action where there is a breach of Licensing conditions or other conditions enforced by the Environmental Health team. The Business Growth manager will be informed where more formal action is required.

**Sub Section 3.3 – Risks**

Point reworded so that the policy also looks to mitigate risk from activities or events that could contribute to the transmission of infectious diseases, such as but not limited to COVID-19 (Coronavirus). Further safety requirements from applicants are included later in the policy.

**Section 4 - Applications**

4.3 - Policy point reworded to make it clear that applications can only be made up to a maximum of 12 months in advance.

4.10 - Additional point added to reflect the appointment of Markets Officer and their role in determining applications to stand at Council run markets/events.

**Section 6 – Large Events**

6.1 – Policy point reworded to include the Council’s Health and Safety team in the circulation of supporting documentation, where an applicant has advised of a larger event with a planned attendance of 499 or more. This is obviously not applicable during the pandemic due to large gatherings currently being prohibited under law. Applications received in which detail proposed activities which would be in breach of Coronavirus rules, would currently be refused.

### Section 7 – Insurance

Additional wording to allow the use of ‘Excess Policies’ by applicants, to fulfil the correct levels of Public Liability insurance cover required by the Council for proposed activities detailed in an application. Excess Policies allow insurance policy holders to essentially ‘top-up’ their cover on a temporary basis, whether this is within a set time frame or a number of events. This may be applicable where an event organiser only holds Public Liability cover of up to £5m, but wishes to apply for squares use to hold a larger event or market. In those cases, the applicant would require cover of at least £10m, so the use of an Excess Policy by the applicant in this instance would be permitted. The total amounts for public liability cover required by the Council remain unchanged.

### Section 8 – Criteria for determining applications

First point expanded - It is detailed that where an application would be likely to present an unacceptable risk to public health and safety, it would be refused. Additional wording to this point to include where an applicant “isn’t able to demonstrate proper understanding and/or implement the necessary measures required by the Council, to ensure the proposed activities are COVID-19 secure”.

### Section 9 – Access

9.1 – Policy point reworded to differentiate the process for allocation of space, where an applicant is attending a square to attend a Council ran market or event, as opposed to other applications. Typically, successful squares use applicants are issued with a plan, showing the booked space alongside their permit. Where a trader is attending a newly arranged Council run market, individual traders will not be issued with a plan or able to secure a specific regular plot by guarantee, rather they will be positioned by the Markets Officer on arrival. This is a point of safety to ensure efficient and safe setup of a market and to best manage stall holder arrivals to site.

### Section 10 – General Conditions of Permit

10.3 - additional point added stating “If safety barriers, painted, roped or taped zones demarcating areas to facilitate ‘Social Distancing’, one-way or other pre-determined access and egress points or routes into markets or events, limit the space for town centre trading; further conditions on times, dates, areas and methods of access could be applied to a permit, which may differ from other permits issued previously or in the future for the same location”.

10.13 added following feedback from Environmental Health team. Details around the storage and use of gas bottles (typically for food stalls) on town squares. Applicants were previously supplied with guidance notes on this, but this was not previously included in policy.

Section 11 –Notifications and additional permissions

11.2 - reworded to include the role of the new Markets Officer.

11.3 - new point added stating that the Environmental Health team must now be notified off all food stalls/concessions prior to trading.

11.9 – new point added which specifies that the supply of portable handwashing facilities (where required) are the responsibility of the individual trader. Where the trader is attending a Council run event, the Markets Officer will ensure these facilities are in place, where the event/market is not Council run, the responsibility lies with the applicant named on the permit (the wider event organiser).

Section 15 – Cancellations

15.1 – expanded to include “...Local or National restrictions in place as a result of a pandemic severely limit or prohibit the proposed activities” may be a reason for cancellation.

New permit and application form design, to allow the collection of trader details for Council ran markets, using the same form.