

Report of the Assistant Director Environmental & Regulatory Services to the meeting of the Miscellaneous Licences Panel to be held on 14 March 2012.

B

Subject:

A proposal from the Regeneration Manager to relax street trading restrictions in the City Park area of Bradford City Centre.

Summary statement:

At their meeting on 20 January 2012, Members considered the above proposal and resolved that the statutory consultation period and advertisement period be initiated and that draft guidance on the criteria for granting applications for consent to trade in the defined 'City Park' area of Bradford City Centre be produced.

The formal objection period has now ended and the Assistant Director Environmental & Regulatory Services submits this report for consideration of members, together with the draft City Park Street Trading Policy.

John Major
Assistant Director
Environmental & Regulatory Services

Portfolio:

Environment & Waste Management

Report Contact: Melanie McGurk
Senior Licensing Officer
Phone: (01274) 431873
E-mail: melanie.mcgurk@bradford.gov.uk

Overview & Scrutiny Area:

**Environment & Waste Management
Safer & Stronger Communities**



INVESTORS
IN PEOPLE



2009-2010
Positive engagement
of older people
2006-2007
Improving Rural Services:
Empowering Communities



1. SUMMARY

- 1.1 Members resolved at their meeting on the 20 January 2012 that the Assistant Director, Environmental and Regulatory Services, be authorised to initiate the procedures required for designating the 'City Park' area as a consent area for the purposes of street trading.

Members also resolved that the Assistant Director, Environmental and Regulatory Services, in consultation with the Assistant Director, Economic Development and Property, be requested to produce draft guidance on the criteria for granting applications for consent to trade in the defined "City Park" area of Bradford City Centre.

- 1.2 A plan showing the proposed consent area is attached marked Appendix 1
- 1.3 The draft City Park Street Trading Policy is attached marked Appendix 2.
- 1.4 The conditions of operation for licence or consent holders are attached at Appendix 3.

2. BACKGROUND

- 2.1 On 20 January 2012, Members considered a proposal from the Regeneration Manager to relax street trading restrictions in the defined 'City Park' area of Bradford City Centre.
- 2.2 In accordance with the resolution of Members on 20 January 2012, a notice was posted in the Telegraph and Argus Newspaper on 27 January 2012 advertising the street trading proposal and requesting comments in writing to be forwarded to the Strategic Director, Environment and Sport. The Council's Highways Section and the West Yorkshire Police were also consulted as required by statute.
- 2.3 No representations have been received in response to the formal advertisement and consultation.

3. OVERVIEW AND SCRUTINY COMMITTEE CONSIDERATION

Not applicable.

4. OTHER CONSIDERATIONS

- 4.1 In order to designate an area as a consent area, following the 28 day consultation period, the Council is required to:-
- a) Consider any representations made within that period;
 - b) Pass a resolution designating the area;
 - d) Place a notice of the passing of such a resolution in a local newspaper for two consecutive weeks.

5. OPTIONS

5.1 Members are asked to consider this report and decide whether to:

- a) resolve to adopt the proposal to designate the 'City Park' area of Bradford City Centre as a consent area for the purposes of street trading.
- b) resolve not to designate the area referred to.
- c) subject to deciding to proceed with option a) above; to authorise the adoption of the draft City Park Street Trading Policy (subject to any amendments or alterations the Panel may wish to make)..

6. FINANCIAL & RESOURCE APPRAISAL

The cost of the notices will be met from existing budget provision of the Bradford City Centre Manager.

7. RISK MANAGEMENT

There are no apparent risk management implications.

8. LEGAL APPRAISAL

Street Trading is defined in Paragraph 1 of Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982 as:-

"the selling or exposing or offering for sale of any article (including a living thing) in a street".

"street" includes—

(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.

Streets and public places may be designated as:-

Prohibited streets where street trading is prohibited altogether;

Licence streets where licences providing for trading can be issued by the Council;

Consent streets where the Council's consent is necessary for trading.

9. OTHER IMPLICATIONS

9.1 EQUAL RIGHTS

There are no apparent equal rights implications.

9.2 SUSTAINABILITY IMPLICATIONS

There are no apparent sustainability implications.

9.3 GREENHOUSE GAS EMISSIONS IMPACTS

There are no apparent sustainability implications.

9.4 COMMUNITY SAFETY IMPLICATIONS

There are no apparent community safety implications

9.5 HUMAN RIGHTS ACT

Once consents are granted to individual traders, there may be human rights implications in respect of Article 1 to the First Protocol of the Convention (peaceful enjoyment of possessions) arising from revocation/non-renewal of such consents.

9.6 TRADE UNION

Not applicable

9.7 WARD IMPLICATIONS

Ward Councillors have been notified of the proposal.

10. NOT FOR PUBLICATION DOCUMENTS

None.

11. RECOMMENDATIONS

- 11.1 A plan showing the proposed consent area is attached marked Appendix 1. Members are asked to consider this report and make a decision as to whether to resolve to adopt the proposal to designate the 'City Park' area of Bradford City Centre as a consent area for the purposes of street trading or resolve not to designate the area referred to.
- 11.2 Subject to members deciding to designate the 'City Park' area of Bradford City Centre as a consent area for the purposes of street trading; Members are also requested to authorise the adoption of the draft 'City Park' Street Trading Policy attached at Appendix 2 (subject to any amendments or alterations the Panel may wish to make) as a guide to decision making.

12. APPENDICES

- 1. Plan showing the proposed consent area.
- 2. Draft City Park Street Trading Policy
- 3. Conditions of operation for licence or consent holders.

13. BACKGROUND DOCUMENTS

Plan
Draft Policy
Conditions.



CITY PARK BRADFORD

STREET TRADING POLICY

March 2012

City of Bradford MDC

www.bradford.gov.uk

Deliberately left blank

1.0 Scope

This Policy has been adopted to control street trading within the City Park area (boundary detailed in Appendix 1) and sets out the Council's standards for determining applications for, and enforcement of, street trading activities within City Park.

The City of Bradford Metropolitan District Council (the Council) has adopted Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982 to control street trading in City Park and the city centre, though this policy only applies to City Park at this time.

This policy is written in conjunction with the Council's booking conditions for Occasional Street Trading – Licensed/Consent Sites.

The Council has designated all areas within City Park as Consent Streets for street trading purposes. The effect of this designation is that street trading in City Park is prohibited, subject to the legal exemptions, without first obtaining consent to trade from the Council.

Street trading is defined as being the selling or exposing or offering for sale of any article or living thing in a street (or within City Park in this case) but the following are not considered

- (i) trading by a person acting as a pedlar under the authority of a pedlar's certificate granted under the Pedlars Act 1871;

- (ii) anything done in a market or fair the right to hold which was acquired by virtue of a grant (including a presumed grant) or acquired or established by virtue of an enactment or order;

- (iii) trading as a news vendor;

- (iv) trading which:

- *is carried on at premises used as a petrol filling station; or*
 - *is carried on at premises used as a shop or in a street adjoining premises so used and as part of the business of the shop; (N.B. This may be covered by other legislation)*

- (v) selling things, or offering or exposing them for sale, as a roundsman (e.g. milkman);

- (vi) the use for trading under Part VIIA of the Highways Act 1980 of an object or structure placed on, in or over a highway;

- (vi) the operation of facilities for recreation or refreshment under Part VIIA of the Highways Act 1980;

- (viii) the doing of anything authorised by Regulations made under Section 5 of the Police,

- (ix) placing goods for sale on the street, street café's operating from a fixed premises or the siting of "A" Boards on the street as this is not within the remit of the above legislation

It should be noted that City Park is civic space, owned by the Council and is not public highway. The whole of City Park is subject to an off street parking places order and none authorised parking may incur a fixed penalty fine.

There is no initial intention to establish street trading activity on a regular basis in City Park, though this may be reviewed in the future. If Consents are granted, they must clearly show that there is benefit or enhancement to City Park or events/activities within City Park.

If consents are granted, then street trading will not normally be permitted from vehicles other than appropriate trailers or stalls, unless there is a specific special event. Bradford Council should be consulted before any application is made.

The Council will apply this policy to street trading activities in City Park to ensure consistency of decision-making. However each application or contravention will be

considered on its own merits so that individual circumstances, where appropriate, are taken into consideration.

This policy will also establish initial guidelines on the type of activity that the Council wishes to see and doesn't wish to see, in City Park (Appendix 4).

The Council has an overall aim to improve the quality of life in the city centre. The Council has four main aims around which it has centred its ambitions for the community. These aims are:-

- Supporting people: to promote social inclusion and enable communities and individuals to participate in improving the quality of life in the city centre.
- Creating jobs and prosperity: to create a thriving local economy, which are responsive to the needs of local communities.
- Protecting the environment: to enhance the quality of the local and global environment.
- Improving the Council: to be considered a high-performing Council by our local community, partners and peers.

All activities in City Park will be carefully vetted and monitored to ensure that they serve to preserve the aims and aspirations of the park and in no way detract from it.

2.0 Aim of Bradford Council's Statement of Street Trading Consent Policy

2.1 The aim of the statement of street trading consent policy ("the policy") is to provide a consistent and transparent approach to the method of providing street trading consent.

2.2 To achieve this aim the Council is committed to partnership working with West Yorkshire Police, the trade and local fixed premise businesses.

2.3 The policy sets out how we intend to manage the street trading consent function within City Park and how we will ensure the process is fair.

3.0 Interpretation

3.1 Any words or expressions in this policy have the meanings assigned to them under the 1982 Act or regulations made thereunder or, in absence, guidance issued by the Secretary of State or guidance produced by the Council. Nothing in the policy can be regarded or interpreted so as to prejudice the 1982 Act.

4.0 Application Process

4.1 Applications must be made in writing on the application form provided by the Council and be accompanied by a copy of the applicants current Public Liability Insurance and the appropriate consent fee, or by agreement with the Licensing section a first instalment.

4.2 Along with the items in 4.1, proposed food businesses should be registered under the Food Regulations with the Local Authority where their vehicle is based and provide evidence that they are registered. If the business is based in the Bradford district, and they are not currently registered with Bradford Council, they should register with the Council before a consent will be granted.

4.3 Applications will be considered within the time limits set in Appendix 3.

4.4 Once a decision has been made on the application, the applicant will be notified in writing.

5.0 Consultation with interested parties

5.1 On receipt of an application, the Council may request further information, depending on the circumstances of each individual application. Prior to determining an application, the Council will consult with such persons and in such manner as it sees fit. This may include consultation with:

- a) occupiers of premises in the vicinity of the proposed trading location;
- b) the local chamber of trade;
- c) the police;
- d) the Council's city centre management staff.

6.0 Consideration of Applications

6.1 The Council will consider each individual application on its merits and will normally grant a street trading consent unless, in its opinion:

- a) There is not enough space for the applicant to trade in the manner proposed without causing undue interference or inconvenience to persons using City Park.
- b) There are already enough traders trading in the vicinity (from shops or other stalls) in the goods in which the applicant desires to trade.
- c) There is undue concentration of traders trading in the street in which the applicant desires to trade.
- d) The consent, if granted, will 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.
- e) The size, nature or appearance of the proposed stall (and any associated equipment) is inappropriate for the proposed location in terms of amenity or public or highway safety.
- f) The proposed trading hours are outside the usual business hours of shops in the vicinity (except in relation to a trader wishing to sell hot food, which will be considered on a site by site basis).
- g) There are any additional issues arising from Consultations, and
- h) There are any previous convictions for relevant offences (Dishonesty, Food Safety, Health and Safety, Licensing or other related issues)
- i) There has been a failure on a previous occasion to pay street trading consent fees within agreed timescales.
- j) The applicant must not be under 17 years of age.

6.2 Any applications for Street Trading Consent on a site where there is already a Consent granted, there are competing applications or an application for renewal has been received will be determined by the Miscellaneous Licences panel.

7.0 Conditions applicable to street trading consents

7.1 Conditions will normally be imposed in all cases specifying:

- 1. May only trade at the location stated on the licence.
- 2. May only trade during the dates and times specified on the licence.
- 3. May only sell the goods described on the licence.
- 4. May only use the vehicles specified on the licence.
- 5. Must display the Street Trading Consent and its conditions conspicuously on the vehicle.
- 6. Must provide satisfactory hand washing facilities if food is sold.
- 7. Must hold and maintain sufficient public liability insurance cover (currently £5,000,000).

8. Must refrain from the use of signage that is not an integral part of the vehicle, including fly posting and A boards.
9. Where food is sold, must provide a suitable receptacle for litter and dispose of such litter with the business's trade waste and the location.

8.0 Special Events

8.1 At special events, Bradford Council will issue one street trading consent to the event organiser, rather than each individual trader, if that event organiser or company is responsible for all the traders under their permission.

8.2 The Council will require that the event organiser produces a list of the individual traders before the trading day and that the traders hold and are able to produce some authorisation from the event organiser. That list will be given to the Council's Licensing Section for review.

8.3 The Council will require the event organiser to ensure that all individual traders hold an insurance certificate for third party liability cover to the appropriate amount (£5 million).

9.0 Promotion of Racial Equality

9.1 The Council recognises that the Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000, places an obligation on all public authorities to have regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and good relations between persons and different racial groups.

9.2 It is the responsibility of the trader to comply with the requirements of the Disability Discrimination Act and the council promotes the use of facilities which can accommodate customers with disabilities.

10.0 Human Rights Act 1998

10.1 The Council will implement the 1982 Act in a manner consistent with the Human Rights Act 1998.

11.0 Avoidance of Duplication with other regulatory regimes

11.1 The Council acknowledges the efforts and responsibilities of other regulators (for instance West Yorkshire Police, West Yorkshire Fire Service and Health and Safety Enforcing Authority) under other legislation. Where practicable, enforcement visits will be carried out with the intention of reviewing other regulatory activities which the Environmental Health service carries out.

12.0 Enforcement

12.1 Any enforcement action taken by the Council will be in accordance with its Licensing Policy, and will take into account the Government's Enforcement Concordat.

12.2 Failure to comply with the conditions may lead to suspension, revocation or non-renewal of the consent.

12.3 Failure to keep up agreed payments under any agreement or invoice may result in revocation of a Consent.

12.4 Any person found trading without consent in a Consent Street or in a Prohibited Street may be subject to enforcement action by the Council.

13.0 Administration, Exercise and Delegation of Functions

13.1 Applications for street trading consents are delegated to either the Miscellaneous Licences Panel or to the Licensing Officer.

13.2 The powers and duties of the Council with regard to Street Trading Consent may be carried out by the Miscellaneous Licences Panel or by Licensing officers acting under delegated authority. Since many of the functions are administrative or compliance monitoring based in nature, in the interests of speed, efficiency and cost-effectiveness, the Council supports the principle of delegating routine matters to officers. Appendix 2 sets out the delegation of functions and decisions.

13.3 At the officers' discretion, applications normally dealt with by officers may be passed up for Miscellaneous Licences Panel determination.

Appendix 1

City Park Boundary Plan



Appendix 2

Licensing Process & Delegation of Functions

The delegation is as follows:

Matter to be dealt with	Miscellaneous Licences Panel	Licensing Officers (consulting with City Centre Management)
Grant or renewal for a Street Trading Consent	If a representation is made	If no representation is made
Grant or renewal for Street Trading Consent for a Special Event	If a representation is made	If no representation is made
Grant or renewal for a second Street Trading Consent in one location	If a representation is made	If no representation is made
Review of policy & conditions	In all cases	
Refusal of Consent	In cases where the set conditions or criteria are not met/breached	
Suspension/ Revocation	In consultation with Head of Service	

Where an application is referred to the Miscellaneous Licences Panel, it will determine each application on its own merit. Members of the Committee will consider all information attached to the application and the contents of this policy.

Appendix 3

Target time scales for processing applications

Function	Time (Maximum)
Acknowledging receipt of applications received.	5 working days
Referral to Licence Panel hearing (if necessary and includes consultation with relevant bodies).	28 days for consultation period 7 further days for any consultation response to be included in a report to the Miscellaneous Licences Panel. Panel hearings can be delayed.
Delegated authority decision (includes consultation with relevant persons).	28 days ending on close of consultation period.
Notification to applicant following decision and/or production and sending Consent on receipt of consent fee or agreed part of consent fee.	5 working days.

Appendix 4

Guide to allowable street trading activity

When	
During the normal working week.	Street trading activity will not normally be considered unless there is a special event. This element of the policy will be subject to review in the future.
Weekends and holidays	The sale of ice cream will be considered, but only from an approved trailer, barrow or tricycle. No other street trading activity, including food or drink sales, will be normally considered unless there is special event. Specialist markets selling craft, art, etc, will be considered.
Special events.	At a number of special events during the year, for example the Christmas Switch-on event, the Council's events manager or approved external events organiser may arrange street trading activity that is deemed to compliment the event and City Park. As per section 8, one consent will be issued to the event organiser who will provide a list of traders before the event.

Occasional Street Trading - Licensed/Consent Sites

Booking Conditions

There are nine licensed sites in the District which are designated for the occasional use of charity and commercial promotions, small scale events and street entertainment (see attached location plans).

These are:-

Bradford City Centre: Ivegate BD1 1RU

Keighley Town Centre: Low Street

Shipley Town Centre: Well Croft

Saltaire: Victoria Road (part)

Bingley: Main Street (part), Wellington Street (part), Myrtle Place, Queen Street, Airedale Street
(NO BOOKING UNTIL FURTHER NOTICE)

No other area of Bradford City Centre, Keighley, Bingley or Shipley Town Centre or Victoria Road, Saltaire may be used for promotional activities, except Centenary Square in Bradford (for details of this contact Cultural Services on 01274 433788).

Automatic bollards have been installed in Bradford City Centre. Vehicles which are used to transport stalls/units or goods to the licence/consent site in Ivegate, which is within the Pedestrian Zone, will only be allowed access before 10.30 am and after 16.30 pm. Drivers should use the intercom system provided and observe the traffic light system. Any Vehicle for Shipley Town Centre must be on site by 9.00 am and cannot leave until after 16.30

Booking conditions

Sites may only be booked for 6 days in a calendar month.

Bookings cannot be taken in Bradford for the period of the Bradford Festival; this is usually of 3 weeks duration during June and July, or for late night shopping days and Saturdays in the run up to Christmas (except for bookings linked to these events).

All bookings may be subject to change or cancellation at short notice because of local conditions e.g. on the advice of the Police, due to environmental or emergency works.

You may be asked to leave the city centre if you or your staff do not comply with the conditions described here.

Personnel

No more than 3 persons representing your organisation can work from the licensed site. Personnel must wear identification giving their name, the organisation's name and their photograph at all times and must conduct themselves in a professional manner.

Activities by personnel employed by your organisation must be restricted to the area of the designated licensed site.

Each person representing your organisation must have a copy of the permission letter from the Licensing Team to use the site.

The promotions should be supervised at all times.

Conditions of Licence/Consent

1. No street trading shall take place except between 08.00 and midnight from Mondays to Saturdays and on Sundays only where the trade is in compliance with the Sunday Trading Act 1994 ("the hours of trading"). Only trading during the times specified on the licence or consent will be permitted and only one trader will be allocated one site at any one time.
2. At all times the licence or consent holder shall comply with all the statutes and legislative orders currently in force. Particular attention should be paid to the requirements of the Food Hygiene (Market Stalls and Delivery Vehicles) Regulations 1966, the Food Safety Act 1990, the Shops Act 1950 Health and Safety at Work Act or any other subsequent relevant legislation and regulations.
3. The licence/consent holder or his/her business shall not be the cause of any nuisance or annoyance to any other user of the highway, the occupier of any land or building or City of Bradford Metropolitan District Council.
4. No water or waste material shall be discharged onto the highway or any adjacent property.
5. The licence/consent holder's stall/vehicle shall be kept in a clean, safe and well maintained condition.
6. Any vehicles which are used to transport the stall/unit or goods to the licence/consent site must be removed from the site before trading commences and must not return until 30 minutes before trading ceases. Vehicles will not be allowed to access the Ivegate, Bradford site between 10.30 am and 16.30 pm.
7. The vehicle/stall shall be removed from the site within 30 minutes of the end of each day's trading and be in situ no more than 30 minutes prior to the start of each day's trading. (Please note a Traffic Order has been implemented which prohibits vehicular traffic in all Town Centre pedestrian precincts between the hours of 10.30 and 16.00, or 10.30 and 16.30 in respect of Bradford City Centre).
8. The licence/consent holder shall remove all refuse within a 25ft. radius of the stall/vehicle from time to time during the day of trading and every day at the end of trading.
9. The licence/consent holder shall ensure that his/her stall/vehicle is positioned only on the site in the licence/consent street for which he/she holds a street trading licence/consent.

10. The licence/consent holder shall not encroach beyond the limits of the site, and at all times shall comply with the requirements of City of Bradford Metropolitan District Council or its authorised officers.
11. A copy of his/her licence/consent shall be carried by the operator of the stall/vehicle when trading and must be produced when requested by Police or authorised Council officers.
12. If a licence/consent holder or his/her employee is requested to move his/her stall/vehicle by the Council, Police or Fire Officer, he/she shall immediately comply with that request.
13. A licence/consent holder must ensure that any other person employed to assist in trading also complies with the aforementioned conditions.

The holder of a street trading licence/consent may employ any person (18 years or over) to assist in trading without the need for further consent from the Council.

14. The licence/consent holder shall not hawk food unless he/she is registered under The Food Premises (Registration) Regulations 1991 by City of Bradford Metropolitan District Council.
15. This licence/consent is not transferable.
16. The above General Conditions may be varied by any Special Conditions relating to a particular location or particular type of goods to be offered for sale.
17. The licence/consent holder shall at all times whilst his stall/vehicle is trading from the site retain a refuse container upon the site.
18. The licence/consent holder shall not place any signs or any objects upon the pavement except a refuse container which would protrude further than 0.5 metre on one side of the barrow without the written consent of the Council.
19. The Council reserves the right to revoke this licence/consent at any time whether for a breach of the Conditions or otherwise and in such circumstances as it believes appropriate may temporarily suspend the licence/consent on such days and times and for such purposes as the Council considers necessary for it to do so.

The Council will endeavour to give reasonable notice of its intention to temporarily suspend a Licence/Consent.

20. The licence/consent holder shall not hawk or carry about any article for sale or by calling or making any noise by means of an instrument or loudspeaker or otherwise seek to attract attention or custom to any licence/consent site.
21. Any application by the licence/consent holder to vary the list of authorised goods, attached to the licence/consent, must be made in writing to the Legal and Democratic Services Director. The proposed new goods should not be displayed until written approval is given.
22. The licence/consent holder shall hold a valid insurance policy for public liability for single claims up to £500,000 and the Legal and Democratic Services Director or other authorised officer of the Council shall be at liberty to call for and inspect such policy of insurance and the receipt for the current premium.

23. Any application for the grant of a licence/street trading consent or renewal or proposed variation to an existing licence/consent must be made in writing to the Council.
A licence/consent holder may terminate a licence/consent by written notice to the Council.
24. In order to comply with the Children and Young Peoples Act 1933 and City of Bradford Metropolitan District Council Byelaw with respect to Employment of Children and Street Trading no-one under the age of 18 shall be employed by the licence/consent holder at the site (unless employed by their parents or guardians in which case the age is 14).
25. The licence/consent fee is payable in advance.

FOR INFORMATION

26. Offences: any person who
- (a) engages in street trading in a prohibited street; or
 - (b) engages in street trading in a licence/consent street without being authorised to do so by the Council; or
 - (c) trades from a stall/vehicle other than that for which a licence/consent has been given; or
 - (d) trades in a location other than that for which a licence/consent has been given; or
 - (e) trades at times other than those for which a licence/consent has been given; or
 - (f) contravenes any of the "Conditions of Operation for Licence or Consent Holders as listed above.

shall be guilty of an offence and be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

Charity Collections and sales

A Street Collection Permit is required if you make a collection or sale for charity at the event. Applications for this require a minimum of 2 weeks notice and should be made to the Licensing Team, 6th Floor North, Jacobs Well, Bradford, BD1 5RW, telephone number; 01274 432240.

Charges

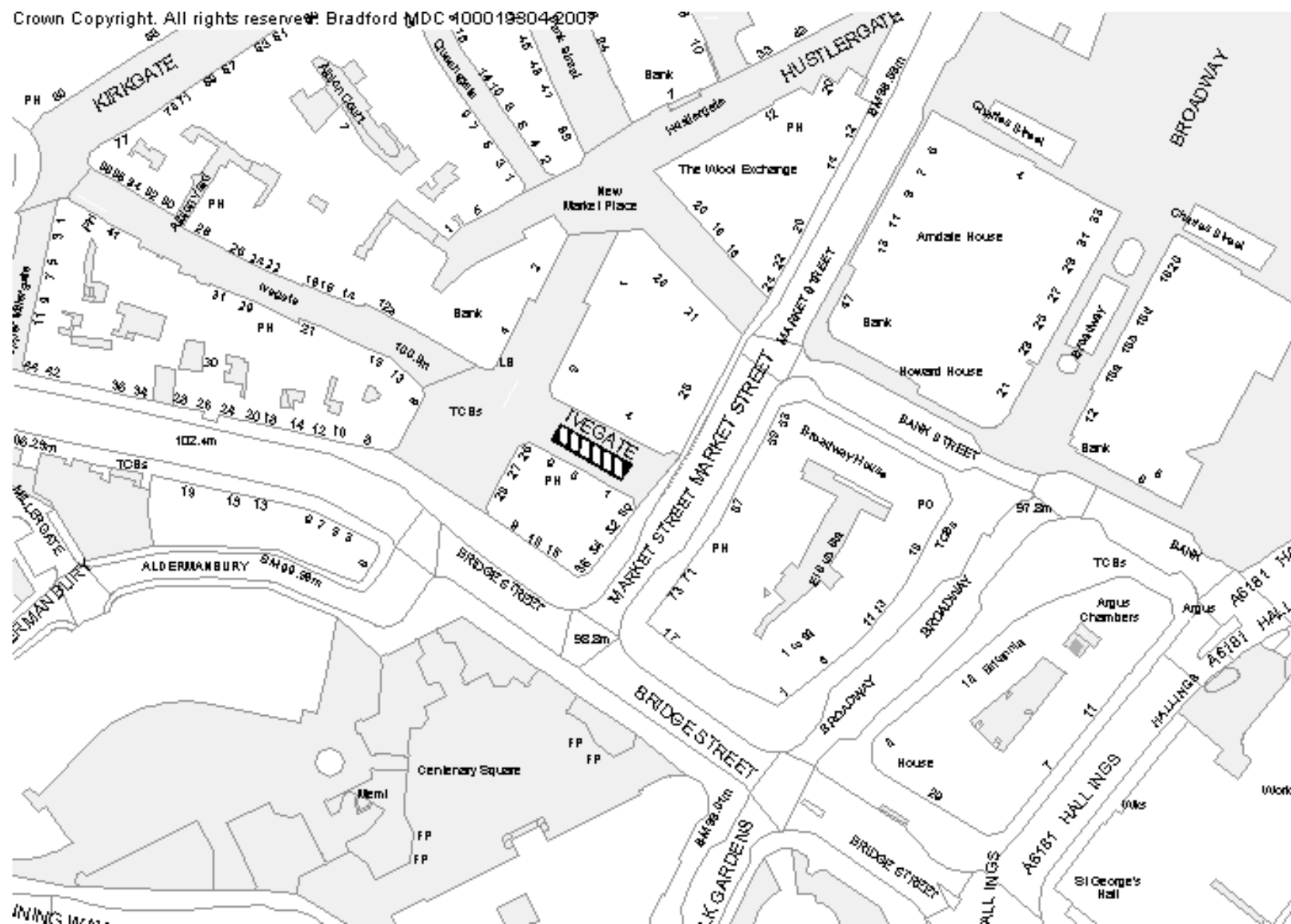
£108 per day.

Exemptions - Registered charities are exempt from these charges.

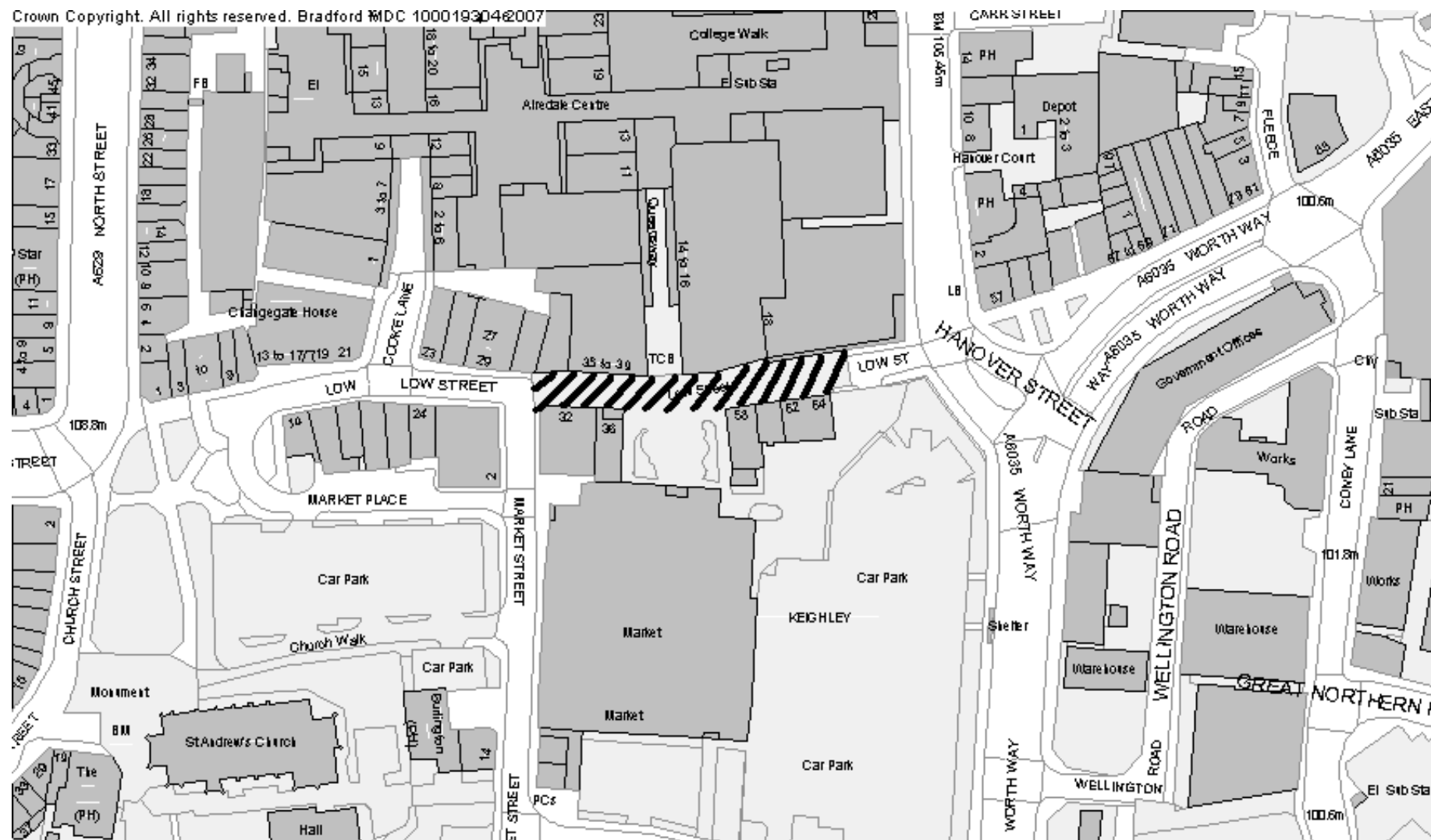
Availability

To check the availability of city/town centre consent sites please ring the Licensing Team on 01274 432240 or email licensingteam@bradford.gov.uk.

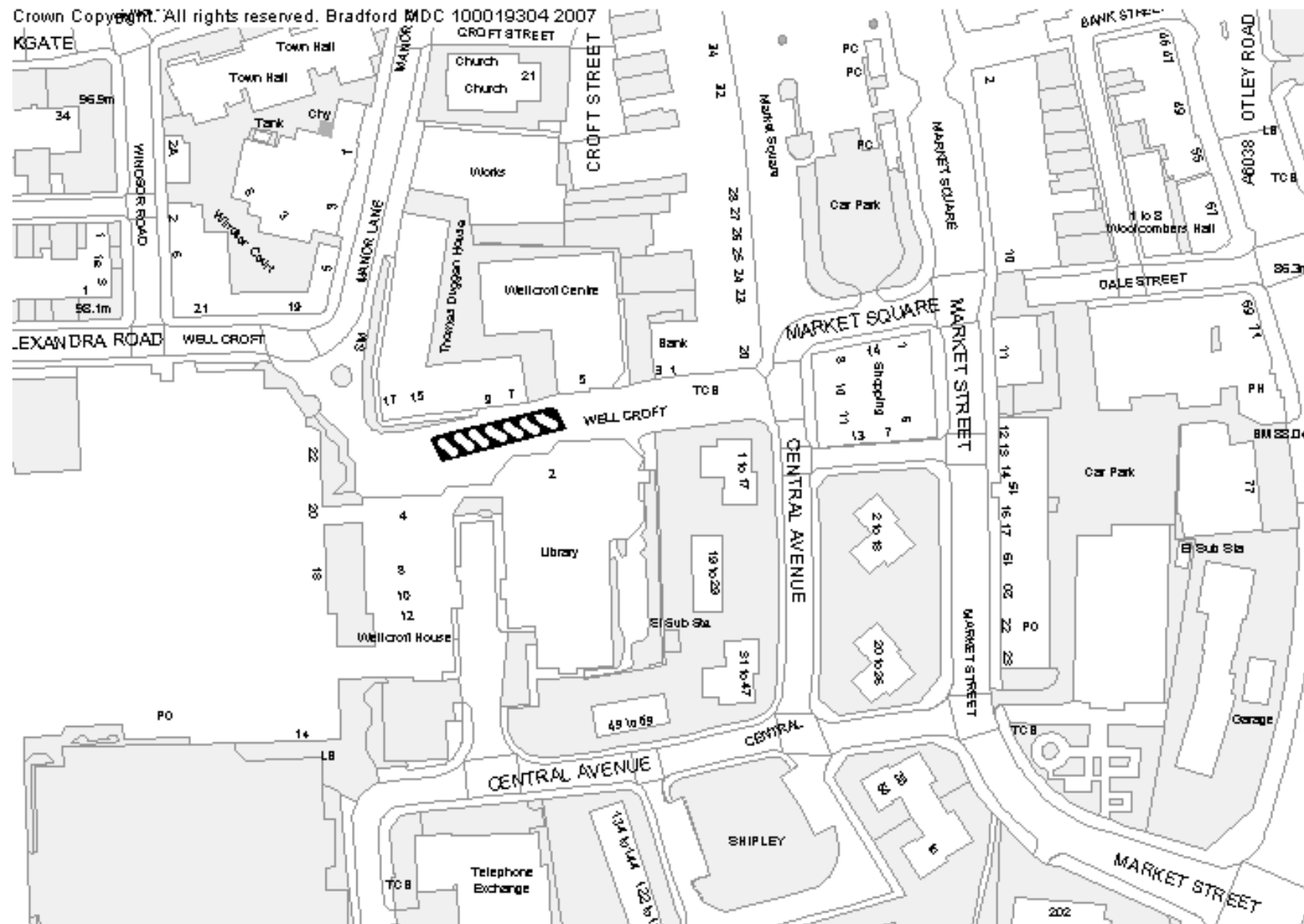
Street Trading – Ivegate, Bradford BD1 1RU



Street Trading – Low Street, Keighley



Street Trading - Wellcroft, Shipley



Street Trading – Victoria Road, Saltaire



Street Trading – Bingley Town Centre

