

Your Ref: 1901852STRADE

Our Ref: COH/NAT/1/25

URGENT

Dear Mr Butler,

Our clients: Mr Taran Catley ('Mr Catley') and NMTF Limited ('the Federation')

Re: Mr Catley's application for Street Trading Consent – Gloucester City Centre

We refer to the above matter.

We have been supplied with a copy of your letter to Mr Catley dated 31st March 2020. We are disappointed to note that, despite the contents of our letter dated 17th February 2020, you have once again acted in breach of the Council's Street Trading Policy 2017-2022 ('the Policy') as follows:-

1. The application and the two representations relied upon have not been considered alongside the list of criteria set out in Annex 1 (as required by Paragraph 2.6.1).
2. There has been no attempt to mediate as required by Paragraph 2.6.3.
3. There has been no consideration given to the possible compromises set out in Paragraph 2.6. or, indeed, to any possible compromises.

You have once again failed to have regard to the purpose of the Policy (see Paragraphs 1.2.1 and 1.2.2) and have proceeded upon the (erroneous) basis that the application should be refused simply because objections have been raised. Despite street trading activities being recognised by the Policy as, 'an essential part of a vibrant and lively city and [as] important to both the local environment and [the] local economy' you have failed to give proper consideration to the Policy and to deal with the application fairly and on its merits.

We require you to supply us with the following as urgently as possible:-

- a. A full copy of the two representations referred to in your letter dated 31st March 2020.
- b. Confirmation of when the application will be determined by the Licensing Sub-Committee.
- c. Confirmation that a copy of our letter dated 17th February 2020 and this email will be placed before the Licensing Sub-Committee for consideration.
- d. Confirmation that Mr Catley will be given the opportunity to present to the Licensing Sub-Committee any comments he may have on the two representations relied upon.

As a result of the actions of the Council, Mr Catley is now unable to trade in Gloucester at all (having previously done so for decades). Please deal with the above points as a matter of urgency.

We look forward to hearing from you as urgently as possible.

Yours faithfully,

Craig O'Hara

Partner



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