

Appendix A

Dear Sirs,

We have recently been instructed to act on behalf of Mrs Shani Worton, the Leaseholder of the Hayes Island Snack Bar.

Our client has engaged us to object to the application issued by Mr Timothy Harris to amend his Street Trading License to include the sale of “burgers” from his site at Working Street 2.

We have attached a copy of our client’s objections to the extension of the existing license.

The background to Mr Harris’ application is vitally important in consideration of this amendment.

On 4 August 2015, the Public Protection Committee considered the re-designation of part of Working Street to allow Mr Harris to relocate following development at Mr Harris’ previous site at Central Square. This application, if successful, brought Mr Harris’ site into direct competition with the Hayes Island Snack Bar.

Objections were raised by our client at the Public Protection Committee meeting in which it was pointed out that the Local Authority had promoted and encouraged the redevelopment of the Hayes Island Snack Bar. Based on this encouragement, considerable sums of money were spent to redevelop not only the site itself but, in addition, the acceptance of responsibility for the subterranean toilets.

We are instructed that the Committee took on board the investment made by our client in regenerating the area and the potential impact of its trade in re-designating part of Working Street and wanted safeguards put in place before the re-designation application was considered. Accordingly, Mr Harris agreed to limit his trade to that of baguettes, jacket potatoes, pre-cooked hotdogs and non-alcoholic drinks.

Our client is therefore dismayed that only five months later, the basis upon which the re-designation was granted, is now subject to an application to remove it.

The application, on our instructions, undermines the entire basis upon which the re-designation was granted and if it had not been for the offer to limit the extent of the License granted the application to re-designate would not have been successful. It is understood by our client that it was the original intention of the Committee to ensure the long term commercial survival of the Hayes Island Snack Bar, which, until recently, had been in significant decline.

Our client has demonstrated, in her attached objection, that it is clear that Mr Harris is directly undercutting the prices charged by the Hayes Island Snack Bar, which, of course, he is able to do as a result of his status as a street trader and his limited overheads.

Our client objects to the inequality that will exist in the event of a successful application and will have little other option than to consider her position further should the Application be granted.

Our client also wishes to address the Committee on the issue of this Application. Please confirm the agreement of the Committee.

We look forward to hearing from you.

Yours faithfully,

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