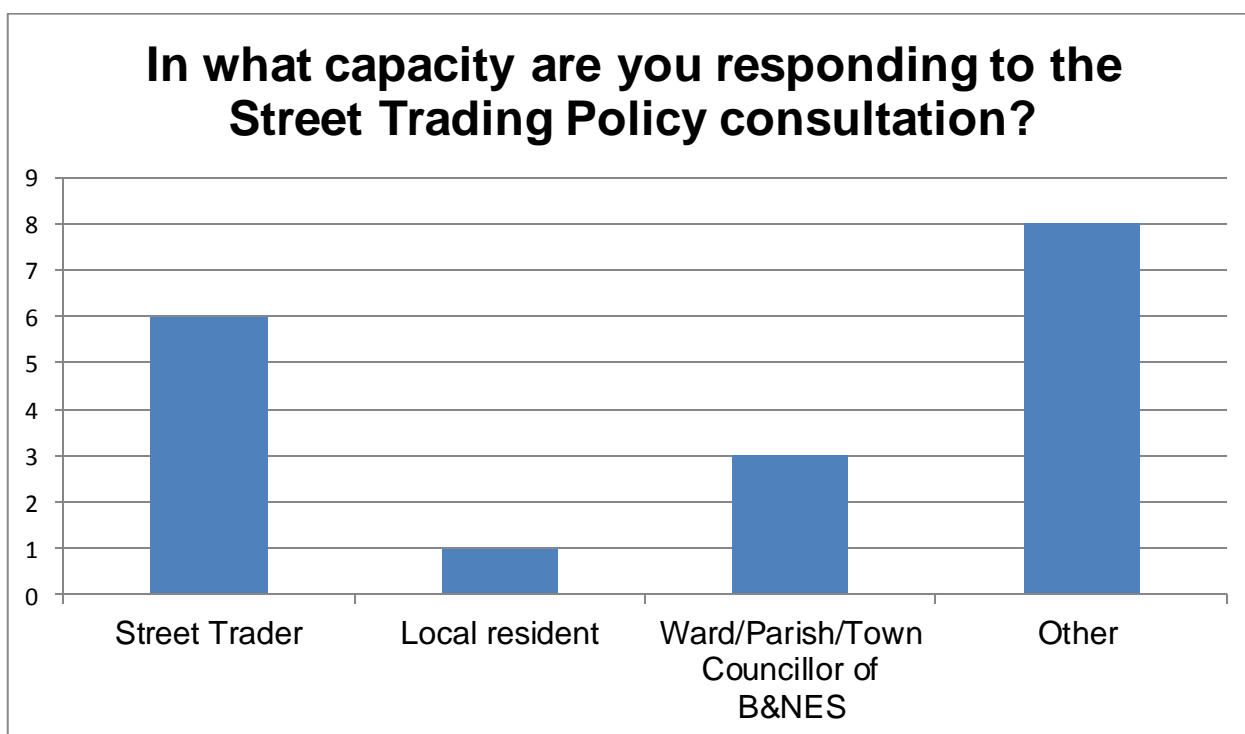


Annex A- Street Trading Policy 2014 Consultation Responses

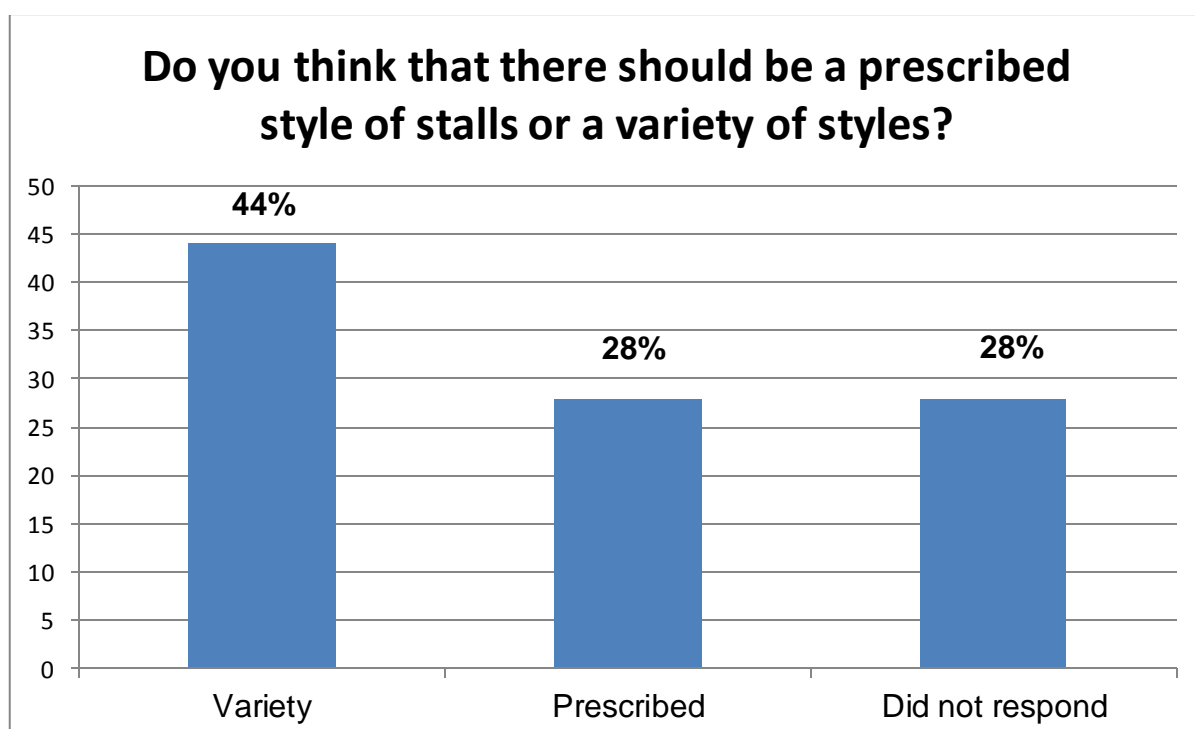
The following responses were received; where necessary, the response from the Licensing Team follows in blue:

Question 1: Respondent (by type)



The respondents in the 'other' category were Council Officers (Including Property Services and Transportation), the Bath Business Improvement District and the Local Food Steering Group.

Question 2: The style of stall:

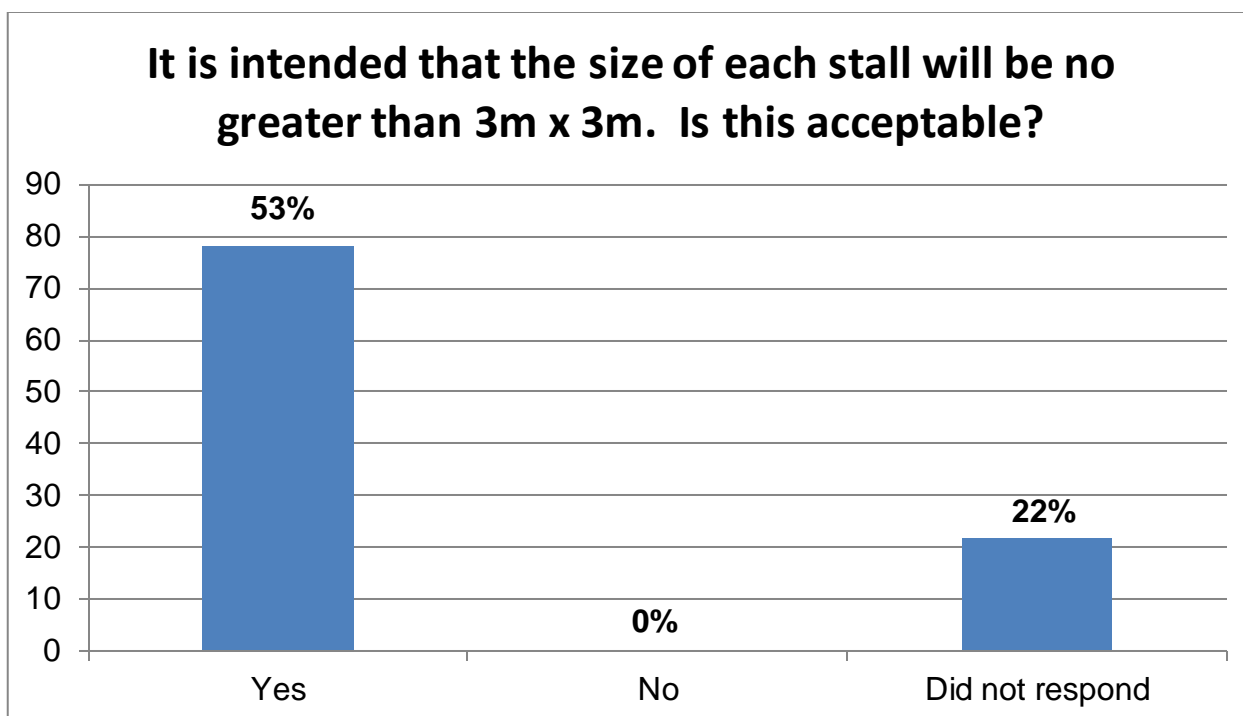


Annex A- Street Trading Policy 2014 Consultation Responses

Response from the Licensing Team about the responses concerning stalls:

The Council is for the first time introducing the guidance about stall designs. In doing this the Council is not wishing to water down the diversity of the traders within the City but wanting to achieve an element of uniformity and consistency in the canopies.

Question 3: The size of stalls:



Question 4: There is an ambition to have more street markets throughout B&NES. Can you suggest any suitable locations?

Bog island (Terrace Walk, Bath) or outside Guildhall on wide pavements; Stall Street; Abbey Churchyard and Kingston Parade; Bath Street; Closing streets and using these - High Street; Bath Southgate and Henry Street/Kingston Parade; Southgate Street; Keynsham; Midsomer Norton;

Thank you for the comments. It is considered that space restrictions would make it challenging for there to be a street market in Bog Island (Terrace Walk). Again, a street market outside the Guildhall would be challenging due to likely obstructions to the pavement and road.

The Licensing Team do support applications for Farmers Markets and we work with organisers to ensure that they are successful. The team will consider a review of Bath City centre pitches and have discussion with Keynsham and Midsomer Norton Town Councils on street trading in these locations.

These suggestions will be forwarded to the Economic Regeneration Team so that they can be fed into the formulation of a strategy for markets in B&NES.

Annex A- Street Trading Policy 2014 Consultation Responses

Please provide any other comments you have about the Street Trading Policy, Conditions and Guidance:

The following responses were received; where necessary, the response from the Licensing Team follows in blue:

"I run the Bath Leather Goods stall at the junction of Stall Street and York Street and have been trading there for a number of years. The proposals for stall design and size all seem reasonable and similar to my current stall design. There is only one point that I would like to make:

Street traders should be offered the option of a fixed power supply for lighting, a utility bollard or weatherproof and lockable power box could easily be fitted on the pitch site. As a craft seller I really need to light my goods all year round and especially in the winter. The power cable can be connected to the nearest street light, which in my case is only ten feet away. I would be willing to pay the costs of connection and a lighting charge could be added to my pitch fee if it meant I didn't have to run a generator every day. I accept that not all traders want a power supply but the improvement to my display would make it worth it for me. An example of the kind of power bollard that I have used in other places is here:

http://www.esi.info/detail.cfm/Furnitubes-International/Doric-cast-iron-major-service-bollard/_/R-32498_SE108RD

Many other designs for bollards or wall boxes are of course available and I would be happy to do the research and provide options if the council can arrange installation. Thank you".

Thank you for the comments. The Council is carrying out a feasibility study into the provision of electrical power for a pilot area in Stall Street, Bath. Feedback from this pilot will be given when it is available.

"Policy fine but is there a more detailed schedule of conditions and restrictions?"

In this policy review guidance notes have been added for the first time and these are considered to be fit for purpose based upon the feedback that has been received during the consultation.

"Peter Dawson Planning Policy Group Manager has asked me to respond to this consultation in light of the work I carried out on the Bath Transport Package last year.

During my time in the Bath Transport Package Team (BTP Team) delivering the City Centre Access restrictions forming part of the wider Bath Transportation Package, I had some close dealings with the street traders and Andy Tapper in Licensing. It became clear from our early consultation events at the Guildhall that the Street Traders were going to be our main objectors to the TRO we were trying to deliver. They had a strong representation at all consultation events and were incredibly vocal in their objections. In the end we had to concede and give them an exemption to the restriction for access purposes despite the fact that all premises based traders, delivery companies, taxi companies and Council services including Waste agreed to work around the restricted access hours. If we did not concede they would have forced a Public Inquiry into the Traffic Regulation Order Proposed. We understood the safety concerns that the traders had in carrying their equipment to the pitch locations however it was felt that equipment could be carried

Annex A- Street Trading Policy 2014 Consultation Responses

in from surrounding streets safely although a little less conveniently. This was not found to be acceptable to the traders. We found it incredibly frustrating that the Street Traders were not willing to buy into the Councils vision of a vehicle free, pedestrian friendly and generally more attractive City Centre which would of course benefit their potential customers and perhaps even boost footfall past their businesses. We also found it frustrating that all other stakeholders were willing to work with us however the street traders who we (The Council) license had the power to potentially block the councils future vision for the city centre. The City Centre Access restrictions were eventually approved and are due to be implemented by the end of the summer this year. We would not be looking to remove any exemptions already agreed with the street traders. However I would request that as part of any future licensing agreements with Street Trader applicants that we should mention the Councils vision of a vehicle free city centre and state that they do not have a vehicular right of access to areas within the city centre that have current/future access restrictions proposed. I think if it is set out at an early stage then traders will be forced to adhere to it along with all other stakeholders. You could argue that it may put some off from applying in future, however I would argue that this would be highly unlikely given the known benefits to street traders being able to trade in the busiest city centre streets. We would also look at mitigating the effects to the traders by improving loading facilities in the surrounding streets.

I hope that you are able to take on board the comments I have raised and thank you for the opportunity given to do so."

Thank you for your comments.

Para 4.2 of the Policy does highlight that the Council will take Traffic Regulation Orders (TRO) into account when creating new street trading pitches.

The Guidance Notes to the Street Trading Conditions will be amended to make existing consent holders aware of current TRO's and possible future TRO's. The Council is also exploring ways to find storage facilities for street traders which would reduce the need to carry stalls/stock in and out every trading day.

"Para 4.1: The link takes one only to the opening page of the public web site. How does one navigate after that? I did eventually find via Business/Street Trading details of the occupied and vacant sites, but those details are not a map."

Para 4.1: Yes, we will make this link specific so you can navigate to the page more quickly.

"Para 5.3: The criteria in para 4.2 are essentially about public safety and nuisance. What about unfair competition with shops or too many stalls selling the same thing? Do you need to also refer to the overriding criteria in para 1.2? There are also criteria in para 12."

Para 5.3: The Council is subject to the EU Services Directive which is designed to ensure fair trade. Para 12.2 of the policy does state that consent will not normally be given for the sale of goods which will may conflict with goods sold by nearby shops etc. Agree that overriding criteria in Para 1.2 should also be included.

Annex A- Street Trading Policy 2014 Consultation Responses

“Para 6.3: What does most suitable mean? It is the nub of the Licensing Manager’s discretion, but is not defined. Do you need to refer again to the criteria in paras 4.2 and 1.2? Is there any appeal against the Manager’s choice between competing bids”.

Para 6.3: The manager's discretion is exercised having regard to the policy as a whole. Always open to hearing comments about decision, but the final decision must rest with the manager and the statute does not provide any appeal process.

“Para 8: What criteria will be applied?”

Para 8: Each application will be judged on its merits in accordance with the policy as a whole.

“Para 9.2: Do you need to refer to para 1.2 as well?”

Para 9.2: Yes, a reference to Para 1.2 will be included.

“Para 10.2: It is not clear what the second sentence is implying. Does it simply mean that the sites will be where busking will not cause nuisance to local residents and businesses? That seems a bold promise, because it depends on how the busking is performed. Do you intend to apply conditions to buskers in these sites which will restrain excessive noise or amplification? If so, should you say so explicitly, rather than implicitly by cross-reference to the criteria in para 4.2 which include noise?”

Para 10.2: The purpose of this policy provision is to permit the otherwise unlawful sale of goods by buskers and other street entertainers. The standard street trading conditions cover public nuisance and the Busking Code of Practice will be attached to the consent. If necessary, enforcement action will be carried out by the Environmental Protection Team using provisions of the Environmental Protection Act 1990. Agree that reference to Para 1.2 should be included.

“Para 14.5: see comment on para 6.3.”

Para 14.5: The manager's discretion is exercised having regard to the policy as a whole. Always open to hearing comments about decision, but the final decision must rest with the manager and the statute does not provide any appeal process.

“Para 14.7: What is a relevant offence? ‘Any other reason’ seems unlimited is our power of revocation so total? Do you mean breach of the conditions of the licence?”

Para 14.7: An example of a relevant offence would be the sale of counterfeit goods. Our powers of revocation are wide and are ultimately determined by the Licensing Sub-Committee.

Annex A- Street Trading Policy 2014 Consultation Responses

“Para 15.1: What does reasonable mean? I have understood (am I wrong?) that the Council may not recover by way of street trading fees in aggregate more than its costs of administering and enforcing the street trading regime, but within that aggregate fees may vary according to the characteristics of the site. If my understanding is correct, should you say so?”

Para 15.1: The Local Government (Miscellaneous Provisions) Act 1982 does allow local authorities to charge variable fees depending upon pitch locations. The Council is allowed to take account of costs including overheads and pitch locations in setting fees.

“We frequently deal with noise complaint from busker's pitches. It might be useful to have some guidance on what is acceptable (e.g. noise ranges, amplification) in the policy. I'm aware that the BID have hosted and written an unofficial set of guidelines in this area, but there is no enforcement or sanction for those who exceed the guidelines.”

Thank you for your comments.

The standard street trading conditions cover public nuisance and the Busking Code of Practice will be attached to the consent, which does provide further guidance. If necessary, enforcement action will be carried out by the Environmental Protection Team using provisions of the Environmental Protection Act 1990. Further information is provided by this team at environmental_protection@bathnes.gov.uk

“Para 13.4: This provision makes it a requirement to register with the Food Safety Team and Para 14.8 states that the application will not normally be delayedunless advice of Food Safety team is required.

The H&S team would like it to be a requirement to ensure that any street traders have a valid gas safety certificate on grounds of public safety. A recent campaign with mobile food traders resulted in a prohibition notice being served on a stall holder in Southgate because of a very poor standard of gas fitting. If the Council is granting permission for street trading - we should be ensuring that we are promoting good standards of safety and hygiene.”

Thank you for your comments.

Agree. An extra provision will be included requiring all consent holders to comply with relevant H&S regulations including gas and electrical safety and Para 14.8 will also be amended to include the Health and Safety Team.

“Street trading makes Bath stand apart from other cities in England by giving locals and tourists a sense of individuality and uniqueness to the city; showing locals that they have independent traders who put money back into the city and provide a small unique service to the customer which is sadly lacking in the big shopping chains! The customer can have a chat about the weather or the problems with a product they may have without having to go through big company protocol. The same applies to the tourist who is eager to meet a real local and get a sense of the English and how we live. Often the street trader is the first port of call if they are lost or need help! People need to meet people to understand the city. So my only comment would be PLEASE leave street trading to be individual each stall being different to show that bath is not just a Standard city; that

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you allow it's locals to breath and show their creativity and uniqueness. This is what will make Bath stand out from the crowd! I would like to thank the Council for giving me the opportunity to sell and paint for the years I have been doing it! I love the job and would hate to see it go and change I try my very best to represent Bath and its people."

Thank you for your comments. By introducing the guidance about stall designs the Council is not wishing to water down the diversity of the traders within the City but wanting to achieve an element of uniformity and consistency in the canopies

"A good variety of shops but shop front should become less stringent to alter. The new shop front on Anthropologie has transformed the area and the ability to do this elsewhere (within reason) will show Bath is evolving and keeping up with other major cities."

Thank you for your comments. Shop based trading is outside the scope of this policy consultation.

"Some stalls have become too large and adversely affect those next to them - they dominate. Some stalls come out too far and when told to move back will do so but then slowly move out again -NOTHING is ever done about this - it really affects the stalls next to them. I suggest a line 12 feet out that we are not allowed to go over - this would be an easy method to stop encroachment. 3m x 3m is fine for some but 4m x 2.25m would be better for others i.e. mine. Parking for loading and unloading is always difficult - help and understanding of our problems would be appreciated. Stalls that create noise and crowds SHOULD NOT be put next to other stalls - it noticeably affects trade - people often cannot get to my stall and can only walk on the other side of the street - not great for business and shouting from the stall doesn't help either. This is the same for buskers who create crowds. Buskers (who are mostly pretty good these days) are also often too loud - amplifiers turned up too loud. Generators are noisy and create fumes - a simple solution would be to provide electric points like many other towns and markets. This would make a HUGE difference for us. Approach has been made to electric companies who could do this easily and not too expensively but blocked by council who weren't prepared to look for solutions - if there is no solution there is no problem - and there IS a problem here. Also with the planned repaving it could be sorted so easily. GULLS - is anything ever going to be done about the menace - the streets are disgusting and not much fun for those who have to spend time out there!!!- the councillor who didn't realise there was a problem obviously doesn't get out much !!! Hope this is all helpful for you. ps the fees are high - note the recent high turnover of stalls -should the council be making a profit from consents (not licences)or should fees just be covering costs?"

These comments are welcomed and will be addressed outside of the policy consultation. However for information the Local Government (Miscellaneous Provisions) Act 1982 does allow local authorities to charge variable fees depending upon pitch locations. The Council is allowed to take account of costs including overheads and pitch locations in setting fees.

In addition the Council is carrying out a feasibility study into the provision of electrical power for a pilot area in Stall Street, Bath. Feedback from this pilot will be given when it is available.

Annex A- Street Trading Policy 2014 Consultation Responses

“The key issue is that the Council is prescriptive about the location of the pitches and acceptable trading uses to ensure that there is a relationship between the street trading activity and the adjacent retail units.”

Para 12.3 and Para 1.2 confirms that the types of goods being sold are considered on a pitch by pitch basis and that the inter-relationship with shop-based trading is also taken into account.

“This joint response to the street trading policy represents the views of members of the B&NES Local Food Steering Group and Public Health Representatives:

Public Health Representatives:

- Bruce Laurence: Director of Public Health
- Paul Scott: Assistant Director of Health Improvement
- Judy Allies: Director of Public Health Award Coordinator
- Jo Lewitt: Commissioning and Development Manager

Local Food Steering Group:

- Jane Wildblood: Corporate Sustainability Manager
- Denice Burton: Assistant Director of Health Improvement
- Sophie Kirk: Corporate Sustainability Officer (Food)
- Jameelah Ingram: Public Health Development and Commissioning Manager
- Mark Minkley: Green Infrastructure Manager
- Graham Evans: Horticultural Manager
- Virginia Williamson: Transition Bath Food Group Convenor
- Lorinda Trebaczyk: Waste Campaigns Officer

Introduction:

Food retail including street trade affects the provision of, and access to, healthy and unhealthy food in our district and can influence peoples’ dietary decisions. This joint-response recommends that guidance is incorporated into the street trading policy to encourage the provision of healthy food by street vendors.

Addressing diet-related ill health and increasing access to healthy food are key priorities outlined in the respective Joint Health and Wellbeing strategy and the draft B&NES Local Food strategy. We recommend that the street trading policy aligns with the above strategies by introducing guidance that encourages the provision of healthy food to support people to make healthy dietary choices. We recommend that the following guidance is incorporated into the street trading policy:

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Section 12: Nature of goods and trading hours:

Incorporate guidance that encourages the provision of healthy food choices in permit to trade.

Example wording: “The Council is committed to promoting healthy eating and consideration will be given to the type and quality of food sold. In the case of stalls selling hot food at least one healthy meal option should be provided.”

Section 12.3: Nature of Goods and trading hours:

Amend the wording of this section:

Example wording: “Goods will normally consist of craftwork, fresh flowers, fresh fruit and vegetables, local produce, ice cream or soft drinks.”

These comments are welcomed and we have amended our policy to reflect some of these recommendations.

“Other recommendations:

Insert another box into the Street Trading Pitch Request Form below “Please enter the types of goods you wish to sell” asking “If food items, which healthy options will you be providing?”
<https://www.bathnes.gov.uk/form/street-trading-pitches>

The Council can ask if an applicant will be providing healthy options but this should not prejudice the application if healthy options cannot be provided due to the nature of the products being sold.

- Include wording around the role of markets and/or street trade in promoting healthy eating and providing local food
- Include wording around the role of markets in promoting environmental sustainability such as local food and low food packaging

Further information:

Further guidance on healthy street food vending can be found on the “Healthy Places” website, and interesting examples of related work by Guildford Borough Council and Islington Council can be found at the following web links:

<http://www.healthyplaces.org.uk/case-studies/?entryid38=1206>

[http://www.islington.gov.uk/publicrecords/library/Economic-development/Business-planning/Strategies/2010-2011/\(2010-07-06\)-Street-Trading-Strategy-2008-to-2012.pdf](http://www.islington.gov.uk/publicrecords/library/Economic-development/Business-planning/Strategies/2010-2011/(2010-07-06)-Street-Trading-Strategy-2008-to-2012.pdf)

These comments are welcomed and we have amended our policy to reflect some of the recommendations.

“I would like to see continued support for the Farmers' Markets in Keynsham and Midsomer Norton.

I believe there is an opportunity for a weekly Farmers type produce market in the city centre, probably Southgate Street. As regards the street trading pitches I believe a review of locations in

Annex A- Street Trading Policy 2014 Consultation Responses

Bath city centre might be useful. Also a discussion with Keynsham and Midsomer Norton Town Councils about street trading pitches in those locations.”

Thank you for your comments.

The Licensing Team do support applications for Farmers Markets and we work with organisers to ensure that they are successful. The team will consider a review of Bath city centre pitches and have discussion with Keynsham & MSN Town Councils on street trading in these locations.

“Any new traders should complement the retail offer of the local shops & street traders.

If the council is going to provide the stall holders with a uniform canopy both trader and council should make provision for the replacement or refurbishment of the street trader’s canopies every 5 years. This will ensure that standards are maintained over the long term.”

Thank you for your comments.

This is agreed. The implementation of replacement units will be phased in over a number of years and it is hoped to introduce a rolling programme to maintain standards.

“Thank you for inviting Paul and myself to yesterday’s workshop. I thought this was well run and stimulated a positive discussion.

1. Strategy on Street Trading

There was a feeling that the workshop mainly focussed the practical aspects of licensing and street trading without asking the question ‘What do we want Street Trading to look like?’ “

Thank you for your comments.

Street Trading has evolved over many years and the task of re-siting all of the existing pitches would prove to be extremely difficult and subject to likely challenge from the street trading community. However the Council recognises the point being made about the street trading offer and will endeavour to consider this when allocating pitches, bearing in mind this is very much driven by the application process and legislation.

“The discussion did linger a lot on page 5 section 13. (look of the stalls).”

The Council recognises that this is an important issue and this review is an opportunity to get the right balance between uniformity and variety of design for our street trading stalls.

Annex A- Street Trading Policy 2014 Consultation Responses

“As previously cited in the document 2010 written by Sarah Mansfield and myself; we feel that your review of street trading is a great opportunity to address some of the more strategic questions about how our retail offer should look and feel to the consumer, and how street trading can serve to complement and enhance this. This was a view expressed at both the BID Board and the Property Landlords forum.”

As previously stated the Council recognises the importance of the street trading offer and working with the retail sector. We endeavour to support this within the restrictions imposed by the EU Services Directive and the applications which we receive.

“The business community is very supportive of street trading and we must eliminate any previous niggles about small vs. large or chain vs. independent, but instead concentrate our efforts of using street trading and markets to grow and support our retail economy in a collaborative way for mutual benefit. Retailers and businesses wish to see a vibrant, aesthetically pleasing and well-managed street trading offer.”

Yes, agreed.

“At present Street Trading is seen as a function of licensing. The management of street trading from a retail perspective is left alone and this has a detrimental impact on our retail offering, and it reflects badly on the World Heritage Status. This has been supported with pictures of pallets and roll containers sprawled in the street, badly spelt signs and a poor presentation of product.”

The legislation governing street trading does not allow for the Council to consider the management of the retail offer within this policy. However, we welcome discussions on how the BID and the Council can work in partnership to support street traders in terms of business advice in the future. The situation described has much improved since the photographs were taken.

“Licenses are granted on a reactive basis rather than considering the retail mix and proactively seeking to fill the gaps in our retail offer.”

Inevitably the allocation of pitches are driven by the applications received however the Council endeavours to consider the retail offer for the city within the restrictions of the legislation.

“Para 4.2 The council reacts to request for pitches rather than stating where and how we want the street trading to look. In a recent application, a coffee vendor asked to be located outside M&S at the top of St Lawrence St. Because of the reactive nature of the policy, the council and retailers had to go through a process of objecting to this proposal. This costs valuable time and waste money for the council. Instead the policy should be stating how the pitches are located and the preference for type of retail use (as a landlord would do) This would then reduce bureaucracy and improve the retail offer.”

The Council cannot refuse to accept an application for a street trading pitch and cannot state a preference for a type of retail use in a particular location given it does not own the highway. Quite rightly there is a democratic process on the allocation of pitches so that everyone has an opportunity to express a view.

Annex A- Street Trading Policy 2014 Consultation Responses

“In the presentation yesterday, I mentioned Kingston-upon-Thames. The council in Kingston works in partnership with the BID to unlock funding and transfers council services for mutual benefit in enhancing their markets/street trading. This is something worth exploring.”

This will be considered.

“The Bath BID would like the opportunity to discuss with you formally, as part of this review, how we can use BID funding and agree a way of ‘protecting the council income on Street trading’ but also enhancing offer through ‘better Retail Management and working together’.”

This is outside the scope of this policy consultation however the Council welcomes having the discussion.

“Is there an arrangement that meets the statutory function while at the same time addresses the retail and management issues? I believe there is and there is a feeling that commercial opportunities are being missed along with an opportunity to be more ambitious. We would like to explore this. This was welcomed by you and your colleagues at yesterday’s meeting.”

Discussions would be welcomed on this point.

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Discussions would be welcomed on this point.

"2. Strategy on Markets

It was not clear yesterday what is the strategy for markets. The only reference is section 9 stating that the council activity supports the provision of temporary street markets. We again would be keen to discuss this with you."

A strategy regarding markets in B&NES is being progressed outside of the policy consultation.

"3. Practical Considerations

Many of the practical considerations and solutions are listed in my email of 26th February 2014. (below) and were discussed at length yesterday. Tethering, light, power, design of carts, storage, etc."

These issues are being addressed outside of the policy consultation.

"The solution about the council buying capital equipment and renting back – I could not find the detail on this. The purchase of capital equipment for street traders has always been a stumbling block to improvement. We are keen to work with the council and find joint solutions as per point 1. May be this could be speeded up before 2017 if we can work in partnership?"

The use of capital funding for procuring stalls is not considered to be a stumbling block and it is anticipated that all the new stalls will be in place well in time for 1 January 2017.

"4. Other aspects of the Policy

**How will the policy address pedlars? Other than section 3.1, Page 2"*

Pedlars are not within the scope of this policy and any pedlar trading illegally will be subject to the appropriate enforcement action.

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“Para 10 on buskers, Page 4, is a welcome step to manage buskers and formally get them to agree the code of conduct.”

The purpose of this policy provision is to permit the otherwise unlawful sale of goods by buskers and other street entertainers. The standard street trading conditions cover public nuisance and the Busking Code of Practice will be attached to the consent.

*“*Para13.2 Many felt that opportunities for a wider discussion about the role of street trading have passed as a date of 1st Jan 2017 has been set.”*

This date is considered to give a reasonable time period for compliance. Feedback from the consultation does not indicate that this date is a problem for the street trading community.

*“*Para11.3 The BID has the license for this area (Kingston Parade)and it continues to be listed on your web site – thank you.*

**The policy does not consider opportunities for incubation, new businesses start up help and business support – this is an important economic aspect.”*

The Council recognises the importance of street trading in assisting start-up businesses and welcomes discussion on how to provide business/marketing support in partnership with the BID in the future.

“5. Communication

I would echo the comments made about communication on the ground and how this has improved. Credit goes to Andy Tapper for being available, on hand and a willing to engage and respond. Thank you.

To reiterate we welcome the invitation from Cllr. Dixon and yourself to meet and discuss this further. I hope this is helpful and supportive to the overall process.”

Thank you for this comment.

I lead a team of 4 valuers in the commercial estates team, looking after approximately 70% of the retail property here in Bath which generates significant income for the Council.

I think what Andrew Cooper said at the recent meeting is very relevant. A whole approach should be taken to the issue taking into account retailers, street traders and markets.

The Council recognises the importance of the street trading offer and working with the retail sector. We endeavour to support this within the restrictions imposed by the EU Services Directive with the applications we receive.

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“No market or street trader should be in competition with existing retailers in the street. Any licensing should be appropriate for the street. As an example last year, someone wanted to operate a Milk Bar directly outside Jolly's in Milsom Street - this was totally inappropriate for such a flagship store.”

See above comment. In the example given the application was not progressed.

“Obviously our retailers pay significant rents and rates to the council and it can be quite irksome when a stall trader pitches up not paying anything like these sorts of sums.”

Clearly the fees for street trading are not the same as for retail lets. However the street traders do not receive the same benefits as retail lets. For example, street trading pitches are subject to the unpredictable factors such as bad weather which has a detrimental impact on their day to day trading ability.

“We have actually had quite a lot of negative comments from our retail tenants when it comes to the Christmas market. It may generate revenues for the stall holders, but quite a few of our tenants say it hits their takings during this period, people should be encouraged to visit the rest of Bath; not just the market. In fact, quite a few of our retailers now take stalls in the market to combat this. This trend is definitely increasing.”

The provision of a street trading permit for the Christmas Market is subject to a democratic process each year and if retailers have issues, this is the time to voice their opinions so that they can be properly taken into account.

“Stalls and traders should not be allowed to pitch in front of existing retail windows and doors, blocking their legitimate displays and entrances.”

Care is taken to ensure that stalls do not pitch directly in front of existing windows and doors of retail premises.

“Specifically on the Policy:-

Para 5.3: whilst referring to 4.2, should also refer to 1.2 as well. Agreed

Para 9.2: should refer to section 1 as well, as should 10.2 Agreed

We agree with 12.2. & 12.3.