

Annex D Analysis of responses received – summary of key points from responses	Comment
Q1 Who responded	<i>Equal spread across key stakeholders: street traders (22%), local residents (20%), other businesses (18%). 'Other', 26%</i>
Q2 Postcode	<i>Majority of respondents were from the BA1 and BA2 postcode areas</i>
Q3 Was the proposed policy easy to understand?	<i>97% of respondents said that the policy was either fully (83%) or partially (14%) easy to understand.</i>
<p>Q4 Is BANES fulfilling its vision for Street Trading?</p> <p>Yes 39%, No 19%, Partially 42%</p> <p>Positives:</p> <ul style="list-style-type: none"> • Street trading has potential to add vibrancy to the city (but needs more strategic thought and enforcement) <p>Negatives/considerations:</p> <ul style="list-style-type: none"> • The Street Trading service is not being managed effectively and therefore cannot deliver the stated vision for this service • The services doesn't 'live' to the values stated in its vision eg health eating, local food suppliers • Needs to be a balance – not all streets have to be active. Need some quiet locations • Street Traders viz a viz retail units – no level playing field (rates, contribution to city upkeep, quality of offer etc) • Stalls detract from the character and ambiance of the city, undermine the retail offer. Not in keeping with a world Heritage Site • Issues include: location, safety, obstruction of shop fronts, obstruction for pedestrians, clutter, advertising • Weak on the promotion of healthy food although subjective • Consultation process vis a vis local businesses • Long term impact on rental and business rates (and income for 	<p><i>The Council is mindful of the role that street trading plays in the local economy and the impact (positive and negative) traders may have on the local environment. However, in managing this service, the Council looks to its obligations under the Local Government (Miscellaneous Provisions) Act 1982 (the 'Act') which sets out the legislative framework in which it must operate. The Council will continue to discharge its responsibilities under this framework with a view to aligning its decisions with its vision and wider strategic objectives.</i></p> <p><i>To achieve this the Council's intention is to:</i></p> <ul style="list-style-type: none"> • <i>Revise its Street Trading Policy to make the strategic links more explicit.</i> • <i>Introduce tighter criteria in operational conditions to make enforcement clearer and more effective.</i> • <i>Introduce greater transparency for the pitch approval and issue of new consents, including the consultation process</i> • <i>Work with traders to improve the look of the stalls</i> • <i>Explore options for a partnership approach to enforcement particularly at weekends</i> • <i>Review the management of Promotional Pitches which are not regulated by the Act but are perceived by the public as related street trading activity</i> • <i>Explore a city-wide planning permission for markets and events</i>

<p>BANES)</p> <ul style="list-style-type: none"> Investment in areas to create more of a market feel <p>Other considerations</p> <ul style="list-style-type: none"> Promotional pitches Noise nuisance from buskers Temporary/pop-up performances as part of festivals 	<p><i>Street Traders do pay lower fees than retail units, however, they do not have the security of a permanent building in which to trade and their trading frequency is subject to impacts from poor weather.</i></p>
<p>Q5 Are the pitches in your community...</p> <p>About right 39%, too many 19%, too few 29%, NA 13%</p> <p>Key considerations:</p> <ul style="list-style-type: none"> No consensus – responses vary from none at all to more giving examples of locations where pitches could be located Not so much about numbers but space they occupy and take up A sense that markets add vibrancy and help direct footfall and should therefore be encouraged 	<p><i>The Council will keep the number and location of pitches under review. It will continue to consult on new pitches when and where this is appropriate.</i></p> <p><i>The Council will determine its allocation of pitches in accordance with its revised policy</i></p>
<p>Q6 Improving the design and appearance of stalls by April 2019.</p> <p>Is this... about right 61%, too soon 10%, not soon enough 29%</p>	<p><i>The Council is seeking to work with stall holders and stakeholders to develop a 'pattern book' of designs to improve the look and feel of stalls and increase consistency amongst traders. New conditions will be effective from April 2019.</i></p>
<p>Q7 Support for rotating traders on premium sites</p> <p>Yes 55%, No 45%</p> <p>Key considerations</p> <ul style="list-style-type: none"> Strong resistance from stall holders citing undermining of built up (often over many years) client base and impact on trade/livelihood, need for parity with retail units and the positive 	<p><i>Administratively, likely to be resource intensive and to give rise to complaints of unfair treatment from the trade which may be difficult to resolve to individual trader's satisfaction.</i></p>

<p>(and unique) impact existing offers can have for the city</p> <ul style="list-style-type: none"> • Customers would find rotation irritating • Rotation of traders will not address current issues • But would provide equity and fairness and change may increase street vibrancy and optimise premium sites. • Offers a chance to deliver vision eg healthy eating • Should rotation be more frequent if damaging the retail offer? 	
<p>Q8 Support for the introduction of assessment criteria</p> <p>Yes 90%, No 10%</p> <p>Key considerations</p> <ul style="list-style-type: none"> • (Lack of) confidence that this will be managed successfully • Needs to be transparent, simple, clearly understood and applied consistently • Needs to be ambitious and enhance the quality of the trading environment and provide diversity • Weighting for criteria that deliver the councils vision? <p>Wednesday market day to increase footfall midweek</p>	<p><i>The Council is looking to introduce assessment criteria within the scope of its legislative framework. The criteria will be taken into consideration as part of the application (for consent) process. The aim is to improve procedural transparency</i></p>
<p>Q9 Day to Day Management of the service?</p> <p>B&NES as is 67%, 3rd party 33%</p> <p>Key considerations</p> <ul style="list-style-type: none"> • Additional resource for the Council required to be effective • Would need to be clear what benefits a 3rd party would bring and not for profit • A question of enforcement of existing conditions • Some support for the BID to take over management role 	<p><i>The legal basis for devolvement of management to a third party is yet to be clarified.</i></p> <p><i>Management of the service by a third party (if this were possible) would be subject to the same legislative framework and conditions as this party would be acting as 'an agent' for the Council.</i></p> <p><i>This indicates a mandate for the Council to continue delivering the management of street trading.</i></p>

	<i>The Council is keen to explore partnership approaches to management.</i>
Q10 Locations for possible street markets? Several suggestions have been made (see Annex C Q10)	<i>Development of a city-wide planning permission for markets and events</i>
Q11 Support for ‘zoning ‘ of markets Yes 68%, No 32% Key considerations: <ul style="list-style-type: none"> • Strong opposition from traders – offer of similar good would adversely affect sales • To a certain extent this is already happening eg Kingsmead Square (food), Walcot Street (antiquities) • Zoned street trading on a daily basis would not work – just markets • Would create know access points for offers • Relies on good communication • There is good practice available from other cities • Public prefers a mix/variety of different offers? • More about being in the right place to encourage footfall than offering specialisms • Should not distract from the historical value of the city 	<i>This would be explored further as part of the city-wide planning permission for markets and events</i>
Q12 Street Traders trading once/twice a week as a more traditional market Yes 46%, No 54% Key considerations	

<ul style="list-style-type: none"> • Strong opposition from traders citing impact on livelihood if forced to trade only 1/2 days/wk when currently trading 5/6, • Some support for traders views – prefer to have access to traders 6 days/wk (especially for fresh produce), only markets not existing traders, risk losing street traders altogether if their business become unviable, prefer traders to remain in the same place • Would reduce accessibility to those who could only visit on that day • Street Trading policy should not be based on this – too restrictive and inflexible • Would create destination and increase footfall in certain areas • Would help with quieter times of the day and year • Would bring benefit to the city and improve visitor experience 	<p><i>No clear mandate, however there are strong arguments for regular street trading i.e. restricting access to stalls if they only traded once or twice a week.</i></p>
<p>Q13 Defining how markets bring benefits to the local area</p> <p>Key themes:</p> <ul style="list-style-type: none"> • Economic benefits to the market traders as well as local traders • Increased footfall and spend per capita • Promote diversity • Quality presentation and offers that add value and increase appeal and attractiveness • Bring offers that aren't available on the high street, that add value and provide an additional reason to visit the locality • Support local economy by selling local products • Local traders who also invest in the local area • Add modernity, animation and vitality to the street (but not at the cost of local traders who pay rents and business rates) • Different offers to cover all demographics • Understanding between retails and market traders 	<p><i>Some of these themes are already in the Council's vision for street trading.</i></p> <p><i>They will also be used to develop the Council's strategic approach to markets.</i></p>

Other comments Respondents were invited to add any further comments they may have in support of their comments made throughout the consultation. These are given in Annex C Q13. They are not summarised in this appendix as the main issues are covered in the key considerations highlighted above and covered by the responses.	
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