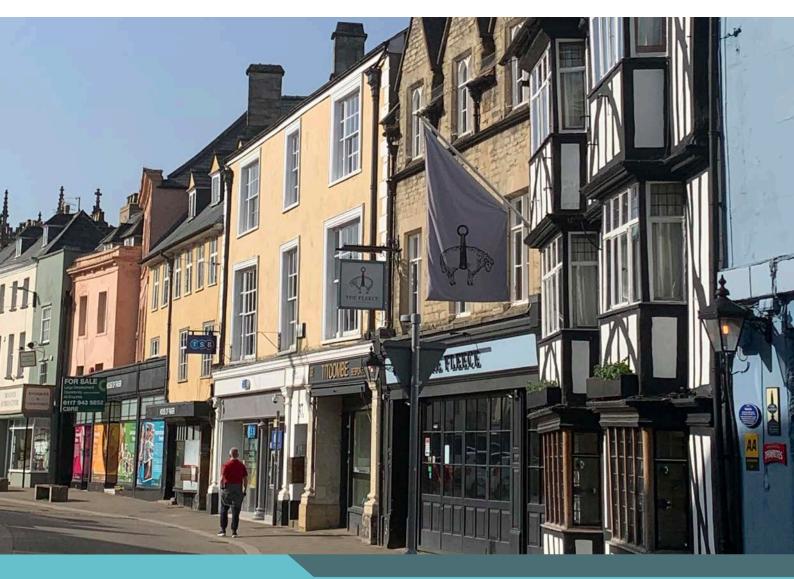






European Union European Regional Development Fund



Consideration of a Business Improvement District (BID) for Cirencester Feasibility study

Produced by Heartflood, May 2022



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Prepared by Heartflood Ltd for Cotswold District Council 2022.

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1 Executive summary

Heartflood were recently commissioned to support the consideration of the introduction of a Business Improvement District (BID) in Cirencester.

BIDs are now widespread and are considered by many within the industry to be the pre-eminent model of management and operational investment within town and city centres.

A key feature of this study has been a survey of a sample of business representatives within central Cirencester in order to identify their collective stance on a possible BID proposal for the town centre. Responses were received from 85 businesses, which indicate reasonable support for the concept of a BID in Cirencester at this stage, with 51% considering that a BID would be a good idea for the town centre, 26% considering that it would not and 23% currently undecided.

The survey responses therefore suggest that there is reasonable viability for Cirencester to further consider the next phase of BID development, within the town centre area based on the following recommendations:

- Subject to the agreement of key parties, such as the Chamber of Commerce, Cirencester moves towards further detailed consultation and ultimately the production of a draft BID Business Plan for the central town centre area
- A timescale is adopted with a view to a BID ballot taking place in June 2023 and a BID operating from July 2023, subject to a positive vote
- Further extensive consultation is carried out with the town centre business community around the following outline proposals:
 - a) The BID boundary to cover the designated area defined on page 15
 - b) A 1.75 % BID levy
 - c) A BID term to be proposed to cover the maximum period of five years
 - d) An exemption level of £5,000 Rateable Value to be set, meaning that listings with a Rateable Value of less than £5,000 would not be liable for the BID levy
 - e) Priority projects for a draft Business Plan to focus on the following initial themes, although to be subject to far greater business consultation to provide a refined final Business Plan:
 - 1. Car parking discounts
 - 2. Improving the appearance of empty shops
 - 3. Marketing & promotion to project the town to a far wider audience
 - 4. Car parking arrangements to provide additional spaces
 - 5. More major town centre events or festivals
 - 6. Projects to encourage investment into the town
 - 7. Physical improvements to paving, landscaping or street furniture
 - 8. Public transport improvements into the town centre
 - 9. Social media campaigning
 - 10. Business to business communication
 - 11. Schemes to save businesses money on overheads
 - 12. Greater lobbying, representation and championing of the town

- 13. Town centre wifi for visitors
- 14. Sustainable travel improvements
- 15. Street cleansing and street washing, including chewing gum removal

These recommendations would result in the following:

- Approximately 470 eligible business premises being part of a BID
- Annual BID levy income of approximately £201,100
- Total BID income over a five-year term of approximately £1,005,500

Given our study findings, we would recommend that any BID arrangements should initially focus on the town centre area, with further consideration of the Love Lane industrial estate area to take place at a future stage.



2 Project background and outline

Heartflood were recently commissioned by Cotswold District Council, to assist with a feasibility study regarding the introduction of a Business Improvement District (BID) in central Cirencester, to include an initial response from a sample of town centre businesses & organisations.

The study began in February 2022 and the main requirements of the project were based on the provision of a robust assessment as to whether or not a BID is feasible, to include reference to the following factors:

- 1. The level of support, or otherwise, for the BID concept from town centre businesses and organisations.
- 2. Projections regarding the level of BID income which could be generated via the total town centre rateable values.
- 3. A recommended BID boundary if the concept is supported, including consideration of the Love Lane area of the town.
- 4. Current national trends in the support for the formation of BIDs in other locations.

The project team involved in the production of this report can point to over 40 years of combined experience within place management, including considerable expertise in the field of BIDs since their introduction in the UK almost 20 years ago.



3 Business Improvement Districts

Since their introduction in the UK in 2004, over 300 Business Improvement Districts have been created across Britain. BIDs operate through the levy of a small percentage on Business Rates, with the actual levy percentage in most towns and cities tending to lie between 1 % and 2 %, meaning that an organisation pays an annual levy of between 1 % and 2 % of the rateable value of their business premises.

All BIDs have a clear and focused role, contained within a Business Plan, which all eligible businesses are invited to vote upon in a ballot. The development of the plan should always have been led by the business community within the area in question and will have involved extensive consultation. In this way, the BID Business Plan should include the priority improvement actions identified by local businesses and be financially robust. Importantly, the plan should also be clear about the levels of staffing, administration and other resources which would be required to deliver the improvement projects.

Under current legislation, any BID needs to be established through a ballot of those eligible businesses listed on the rating database held by the local Billing Authority, in this case Cotswold District Council, and the vote is conducted entirely by post. For any BID to be successful, there needs to be a majority of positive votes within the total number of votes cast and these positive votes also need to form a majority of the total aggregate rateable value of all the votes cast.

It is important to note that the purpose of a BID is to add projects and activities to a town or city over and above those which are already taking place. A BID is not, therefore, a mechanism for any public or private sector body to cease to provide established activities.

The maximum term covered by a BID Business Plan is 5 years and the continuation of any BID beyond their initial term is reliant on the production of a new Business Plan and a subsequent ballot of the businesses within the BID area. The growth in the number of BIDs continues to rise and those already operating in centres surrounding Cirencester include Banbury, Bath, Cheltenham, Gloucester, Stratford-upon-Avon & Swindon.

4 Cirencester town centre overview

Cirencester is a historic town with a population of approximately 20,000, located within Cotswold District and lies 13 miles south of Cheltenham, 13 miles northwest of Swindon and 30 miles west of Oxford. Cirencester town centre takes a nuclear form and serves the day to day needs of the immediate catchment and the surrounding area, as well as attracting tourism from further afield. With an affluent catchment who enjoy high living standards, the town centre experiences good employment levels and low levels of crime and, with roots tracing clearly back to Roman times, contains a range of architectural assets. The town is well served by both national & independent retail, has a diverse food, drink & leisure offer and has a vibrant feel combined with a pronounced sense of place.

Our study found that Cirencester has a number of strengths within its core area, including:

- A varied retail offer, with a good mix of chain and independent retailers, a relatively high proportion of independent businesses and low vacancy rates
- A streetscene which includes a large square fronting the imposing medieval church of St John Baptist
- A number of restaurants, coffee shops and eateries
- A programme of weekly high-quality street markets
- A well-established Chamber of Commerce
- A range of annual events & initiatives

Cirencester also displays a range of retail & leisure operators and ancillary services, including a number of banks, building societies and professional services although, despite the range of strengths, has not been immune to recent economic challenges. The town centre is therefore not currently considered to be meeting its full potential in economic terms.

Love Lane industrial estate

As well as the core town centre area, the commission included a requirement to assess the feasibility of the inclusion or otherwise of the Love Lane industrial area within a BID if one is supported. Love Lane is a large estate comprising approximately 150 business premises and is situated approximately 1 mile south-east of the centre of town, being located beyond the major Bristol Road, which essentially forms part of the ring road system surrounding the town centre.

Project communications

Whilst local feedback was predominantly gained from the survey, as outlined in the following section, a range of communication methods were employed during the course of the project and these included the following:

- Contact with local organisations, such as Cirencester Chamber of Commerce, Cirencester Town Council and Love Lane Business Group
- The production and delivery of two project information sheets
- Direct visits to Cirencester businesses
- Digital communications, including via email and social media
- An open business meeting, which took place in the town centre in April 2022

5 The business surveys

Business feedback was predominantly captured in the form of a structured questionnaire, which gathered a range of information and which was available to businesses both as a hard-copy questionnaire as an online form. Given the different nature of the town centre and Love Lane, two separate questionnaires were designed for each of the distinct areas.

Both surveys ran during February & March 2022 and the town centre survey yielded a total of 85 responses, with the survey responses considered to form a representative sample of the central area. The survey for the Love Lane industrial estate only gained a total of 6 responses and we have interpreted this low level of participation as a clear indication that there is little interest for the concept of a BID for the estate. This position was reinforced by feedback from the Love Lane Business Group, who outlined that their members did not seem willing to engage with the process. Given our study findings, we would recommend that any BID arrangements should initially focus on the town centre area, with further consideration of the Love Lane industrial estate area to take place at a future stage.

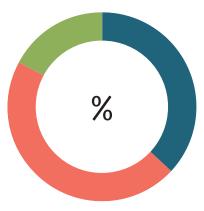
The following section therefore represents an analysis of the 85 responses received from the town centre survey.



6 Town centre survey analysis

Business performance

Survey respondents were asked to assess their turnover for the preceding 6-months, as well as to predict how they considered their turnover would perform in the next 6-months. The responses indicated that business had been relatively buoyant in the past 6-months, and that business confidence about the coming 6-months is relatively positive, as outlined by the following:

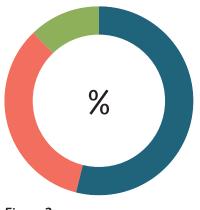


TOWN CENTRE TRADING PERFORMANCE IN THE PRECEDING 6-MONTHS



Number of responses 81

Figure 1



ANTICIPATED TOWN CENTRE TRADING PERFORMANCE FOR THE NEXT 6 MONTHS



Number of responses 80

Figure 2

Perceptions of Cirencester town centre

In general terms, Cirencester is currently viewed by businesses as a reasonable place to dine out, as a very good place for day trips. It is however considered less favourably as a retail centre and as a leisure destination and not viewed well as a professional services hub, as shown by the following:

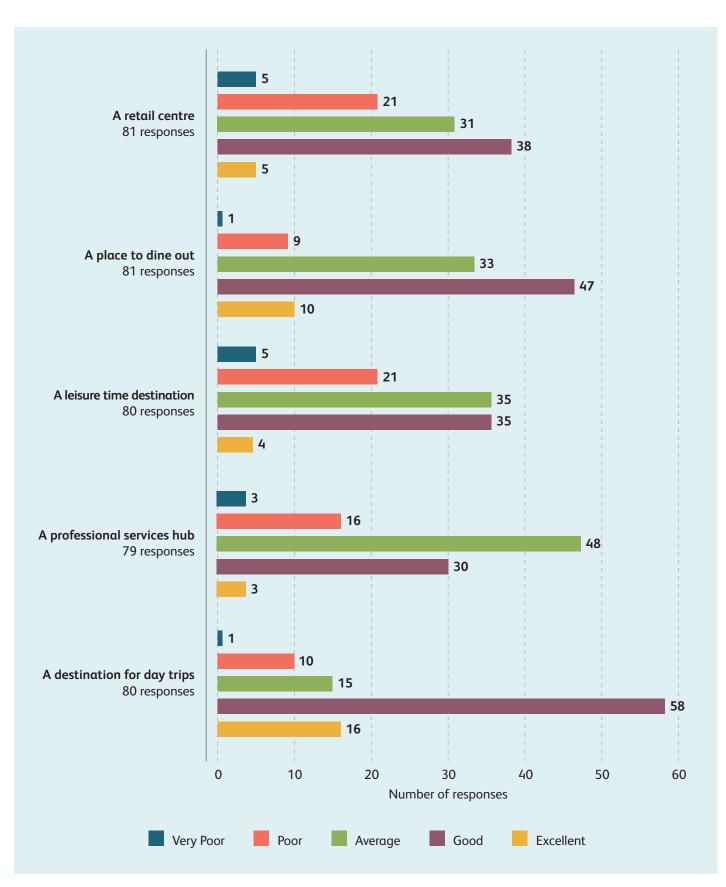


Figure 3 – perceptions of Cirencester for main visitor uses

Perceived town centre challenges

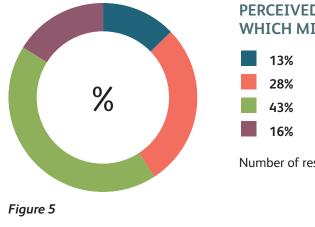
Respondents were asked to identify any issues which they consider are currently preventing the town centre from achieving its full potential and the main factors were ranked as follows:

Issue	Percentage dissatisfaction	
Parking costs	73%	
Vacant units	64%	
Parking availability	63%	
Range of shops	51%	
Promotion and marketing of the town centre	43%	
Customer footfall	33%	
Quality of the shopping environment around the shops	31%	
Transport or access issues	27%	
Range of the leisure offer	21%	
Too few independently owned shops	21%	
Number of responses 75		

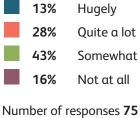
Figure 4 – factors considered to be preventing the town centre from achieving its full potential

Possible benefits of a town centre Business Improvement District

Feelings are reasonably strong on this question, with 84% considering that the town centre might benefit from the additional income raised by a BID and only 16% feeling that there would be no benefit.



PERCEIVED BENEFIT OF THE INCOME WHICH MIGHT ARISE FROM A BID



Possible town centre improvement projects

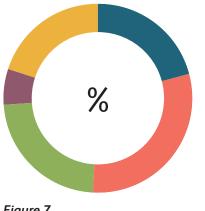
Respondents were asked to identify the projects which they would support any BID income being spent on and the main projects were ranked as follows:

Project	Percentage support		
Car parking discounts	68%		
Improving the appearance of empty shops	60%		
Marketing & promotion to project the town to a far wider audience	52%		
Car parking arrangements to provide additional spaces	45%		
More major town centre events or festivals	42%		
Projects to encourage investment into the town	37%		
Physical improvements to paving, landscaping or street furniture	35%		
Public transport improvements into the town centre	34%		
Social media campaigning	32%		
Business to business communication	31%		
Schemes to save businesses money on overheads	29%		
Greater lobbying, representation and championing of the town	26%		
Town centre wifi for visitors	26%		
Sustainable travel improvements	23%		
Street cleansing and street washing, including chewing gum removal	22%		
Number of responses 66			

Figure 6 - priority projects which respondents would spend BID income to enact

Support for a town centre BID

Feelings are reasonably clear on this question, with 51% considering that a BID would be a good idea for the town centre, 26% considering that it would not and 23% currently undecided:



SUPPORT FOR A POSSIBLE CIRENCESTER BID

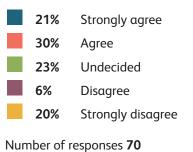
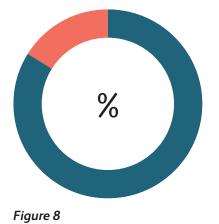


Figure 7

Possible town centre BID levy

Feelings are strong on this question, with 84% in support of a possible 1.75% BID levy and 16% in support of a 2% levy:



SUPPORT FOR POSSIBLE CIRENCESTER BID LEVIES

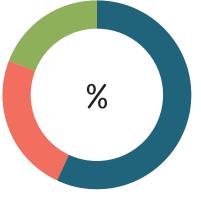
84% 1.75% BID levy

16% 2% BID levy

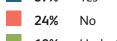
Number of responses 50

Willingness to be within the area of a possible town centre BID

Feelings are reasonably clear on this question, with 57 % considering that they should be included within a possible BID boundary, 24% considering that they should not and 19% currently undecided:



SUPPORT FOR BEING WITHIN THE BOUNDARY OF A POSSIBLE BID 57% Yes



19% Undecided

Number of responses 67



7 Potential boundary for a Cirencester BID

Following analysis from a variety of sources and based extensively on feedback from the business survey, we have suggested what we consider might be the most appropriate BID boundary for Cirencester. This is shown within the red boundary line of the map opposite and covers all expected business sectors, from small specialist independent premises to significant national multiple operators.

The proposed boundary covers what we would consider to be the natural core of the town centre, which takes a relatively nuclear format radiating out from Market Place. Within this boundary there are approximately 470 rateable business listings with individual rateable values of up to £305,000 and we would always recommend that the consideration of any final BID boundary should be assessed further during any subsequent BID consideration process. In this case, would advise that this would need to be combined with at least the following:

- Extensive business liaison to ensure that significant support for a BID is embedded throughout the area in question
- Detailed work to ensure that any range of possible BID projects would impact sufficiently positively on all eligible voters
- A more refined assessment of likely voting patterns across the boundary area, especially to consider the effect of any very large rateable values on possible voting outcomes

Possible exemptions

There are a number of considerations when establishing a BID, including a decision on any exempted listings. It is usual for any rateable value listings below a certain level to be exempted from the BID, which has the purpose of removing anomalies such as telecommunications masts and advertising hoardings from the BID levy.

The illustrations within this report are based on the assumption of a $\pm 5,000$ exemption level being adopted, meaning that any business listings with a rateable value below $\pm 5,000$ would not be liable for the levy. A further rationale for proposing a threshold of $\pm 5,000$ is that it would also remove many of the smaller businesses, often situated on first or second floor levels and who are likely to benefit less from a BID. In this scenario, we would expect a number of these businesses to voluntarily contribute towards any BID and so setting such a threshold does not exclude any business from being part of a subsequent BID.

If a decision were taken to proceed with further BID development, any subsequent considerations on levy, boundary and exemptions should however be subject to further testing and refinement through further detailed business consultation.





Map of Business Improvement District (BID) for Cirencester

8 BID levy options and financial income modelling

In recent years, average BID levies have increased, with the 1.5% rate now being used by more BIDs than the 1% rate and 10% of BIDs setting a rate of 2% or more. When modelling the levy options for Cirencester, we have therefore chosen to model scenarios in the range of 1.75% to 2% as these are considered to form the most appropriate levy income range.

Using the ratings information provided to us, the range of possible levies and corresponding incomes are shown as follows:

% Rateable value	Annual levy income	5 year total
1.75%	£201,100	£1,005,500
1.8%	£206,800	£1,034,000
1.85%	£212,600	£1,063,000
1.9%	£ 218,300	£1,091,500
1.95%	£224,000	£1,120,000
2%	£229,800	£1,149,000

Figure 10 – possible levy options for a Cirencester BID

We would outline the following with regard to the above table:

- The table assumes a possible exemption level of £5,000, meaning that small businesses listings with a rateable value below £5,000 would not become liable for the BID levy
- An estimated levy-collection rate of 95 % has been applied
- Annual levy figures are rounded to the nearest £100
- Other factors would need to be considered further during any BID development stage, which would include but not be limited to 1) The effect of any changes to the boundary area following business feedback 2) The costs which may be applied to any BID, such as any levy collection costs 3) Any adjustments which may need to be applied, such as a possible cap to limit the levy proposed for very large rateable values 4) The effects of any national Business Rates revaluation

Given the range of factors available to us and with particular regard to the responses from the survey, we would recommend at this stage that a possible levy rate of 1.75 % is considered when moving forwards. The rationale for this is that the range of activities which a BID would usually expect to carry out, including the employment of staff to oversee the activities, means that the 1.75 % recommendation would be likely to create the appropriate balance between being supported by businesses and generating sufficient income to enact a significant range of improvement projects. We would however always emphasise that further detailed consultation and liaison should take place with businesses regarding the proposed BID levy during any subsequent BID development stage.

9 Comparison with established BIDs

The following BIDs are considered to represent a good comparable sample range to Cirencester in terms of size, geographical spread, BID levy percentage and overall income.

BID	% RV levy	Levy number	Annual levy income
Beckenham	2%	310	£194,000
Melton Mowbray	1.5 %	490	£165,000
Penzance	2%	400	£160,000
Poole	1.5 %	500	£265,000
Cirencester (if developed)	1.75 %	475	£201,100
Average of the above	1.75%	435	£197,000

Figure 11 – comparison with established BIDs

Likely voting patterns in Cirencester and likelihood of a positive BID vote

Whilst it is difficult to anticipate the voting patterns of all the businesses in the potential BID area, the survey suggests that there is reasonable support for a BID in Cirencester although, if a BID is pursued, we would strongly advocate that a great deal of further work is undertaken to try to increase the required business engagement and to establish how a number of the premises with higher rateable values are likely to vote in any subsequent ballot.

The creation of a Development Group

BIDs generally involve the creation of a Company Limited by Guarantee, which limits the financial liability of any Company Director and a Board of between 10-14 Company Directors is usually formed from BID levy paying organisations to create a representative and business-led group of Directors to oversee the financial, managerial and operational arrangements for the BID.

The development of a BID requires the fundamental support of a number of businesses and, whilst it is common for any BID process to be professionally supported meaning that the business group are not required to carry out all of the required tasks, there is a requirement for this group to attend planning meetings and to assist with the required campaigning for a positive BID vote.

In Cirencester, it is recommended that further discussions should take place with businesses and organisations, including the Chamber of Commerce, to establish a development group to oversee any proposals for a Cirencester BID.

The survey included a question as to whether businesses would consider joining such a group to assist in supporting any subsequent BID process and 25% of respondents indicated that they would be interested in joining this.

10 Next steps and risks

We would expect that a BID proposal would create a workload of approximately 100 days over a period of approximately 12 months and a budget of approximately £35,000 would need to be established to cover management costs, as well as the costs of various & extensive communication activities, including designing and printing a BID proposal.

It is considered that the following timetable could be adopted in Cirencester, assuming that a decision is taken to pursue a BID for the area:

Dates	Component
June 2022	Decision taken to develop a BID proposal
July 2022 to April 2023	Business liaison and consultation on proposed Business Plan
Μαγ 2023	Launch of Business Plan
June 2023	BID Ballot
July 2023 to September 2023	Formation of Board of Directors, appointment of staff and BID begins operation – subject to a successful ballot outcome

Figure 12 – possible BID timetable

The inherent risk in any BID process is that the ballot is rejected - by failing to gain the required majority of votes cast or failing to gain the majority of the aggregate rateable value of votes cast.

The majority of BID ballots have been successful, although the risk always exists of a BID ballot being unsuccessful, which can result in:

- No return on the significant investment in developing the BID proposal
- Loss of reputation and credibility of the BID proposer
- An informal requirement for a cooling-off period of at least 1-2 years before any attempt is made to repeat the attempt to develop a BID within the town

Given all of the factors which we have examined, we would advise that there is reasonable viability for Cirencester to enter the next phase of BID development.

11 Overall study recommendations

In considering all of the information available to us, our key recommendations are as follows:

- Subject to the agreement of key parties, such as the Chamber of Commerce, Cirencester moves towards further detailed consultation and ultimately the production of a draft BID Business Plan for the central town centre area
- A timescale is adopted with a view to a BID ballot taking place in June 2023 and a BID operating from July 2023, subject to a positive vote
- Further extensive consultation is carried out with the town centre business community around the following outline proposals:
 - a) The BID boundary to cover the designated area defined on page 15
 - b) A 1.75 % BID levy
 - c) A BID term to be proposed to cover the maximum period of five years
 - An exemption level of £5,000 Rateable Value to be set, meaning that listings with a Rateable Value of less than £5,000 would not be liable for the BID levy
 - e) Priority projects for a draft Business Plan to focus on the following initial themes, although to be subject to far greater business consultation to provide a refined final Business Plan:
 - 1. Car parking discounts
 - 2. Improving the appearance of empty shops
 - 3. Marketing & promotion to project the town to a far wider audience
 - 4. Car parking arrangements to provide additional spaces
 - 5. More major town centre events or festivals
 - 6. Projects to encourage investment into the town
 - 7. Physical improvements to paving, landscaping or street furniture
 - 8. Public transport improvements into the town centre
 - 9. Social media campaigning
 - 10. Business to business communication
 - 11. Schemes to save businesses money on overheads
 - 12. Greater lobbying, representation and championing of the town
 - 13. Town centre wifi for visitors
 - 14. Sustainable travel improvements
 - 15. Street cleansing and street washing, including chewing gum removal

These recommendations would result in the following:

- Approximately 470 eligible business premises being part of a BID
- Annual BID levy income of approximately £201,100
- Total BID income over a five-year term of approximately £1,005,500

Given our study findings, we would recommend that any BID arrangements should initially focus on the town centre area, with further consideration of the Love Lane industrial estate area to take place at a future stage.



Appendix 1 – Further survey feedback

In addition, the survey asked for any further comments which respondents wished to make and those received are reported entirely as they were received as follows:

Additional comments

A lot of Cirencester residents just don't come into the town anymore, like so many other towns, the satellite shopping areas, are much more convenient to go to, they are mostly concrete and bland, that is ok for them, but our town centre is bland too, and therefore is not attractive enough, having a beautiful church is not enough.

As a business owner previously in a different city with 2 separate B.I.D areas, We felt that the cost to businesses did not match up to any improvement. The only winners were the private sector bosses taking the big wage. Unfortunately the idea always sounds better than the outcome, cant see it being any different in Cirencester.

BID is never a good idea every town in the whole of England wales and Scotland are ruined By BID and besides its our frigging money so not a chance in Hell will pay so you can stick it where the sun don't shine.. P. S look up AGAINST BID SITE...

Council need to do their job with some common sense. Stop issuing parking passes to the actual businesses that need the parking for their customers, thus freeing up the prime town centre parking. The crisis can be solved over night.

Customers love Cirencester and it is vibrant and popular. BIDs are normally for areas that might be struggling. The independent shops in Cirencester do a great job of promoting the town and wider Cotswolds.

Diversity is important: Ciren is currently dominated by charity shops & coffee shops.

I pay for BID in both Bath and Bristol and I consider it a waste of money, retail shops pay plenty of business rates and that should pay for whatever is needed.

I think it's disgusting that you even consider asking business owners to pay for this scheme given the excessive rates we pay and the service we get in return for this. The money for these improvements should come from lottery or government. Maybe less military spending and a bit more on this kind of thing.

I would like to know what % of the annual BID income will be spent the scheme overheads especially staffing. It could easily be the majority of the estimated £150k annual income. Why if the council is concerned enough to create a BID did they choose to increase the car parking prices which directly impacted all the retailers in the town?

I've read a little around BIDS, and at this stage I'm undecided whether it's in our best interests. I've various queries regarding whether a limited company would be formed and who would act on the board of directors etc but the one query everyone will ask (or should) is the projected 150k a net figure? Or would operating costs need to be deducted (project management, salaried staff, office rental etc) If so, what are the projected operating costs p/a over the 5 year term? The main negative comments from other towns running BIDs is that the money is spent on services their district councils previously provided. I appreciate this survey needs to be fairly generic, but we already pay business rates and council tax towards many of the services suggested. CDC may feel that they can ease the cost burden on, say, CCTV, by using the surtax from the BID to fund it – but it will go down very poorly with businesses that already feel the rate system is grossly unfair and in need of reform

Improve the market place, no one has any idea who has right of way, I find it dangerous.

Additional comments

Investment is great but upping rates is not good. Instead look at small wins that drive footfall. I'm based in bishops walk and footfall is and could be increased by blocking off the pathway by Ladbrokes to encourage people to walk through the arcade. This would have been extremely beneficial when the mop came to town. We stayed open but the footfall from the car park went down the ally next to the bookmakers. We would have captured more business if people parking cars were to want through the arcade.

It is not necessary to tell businesses how to promote their particular business. Charging more rate increases to business rates is totally unacceptable at this moment in time.

It will cost me and we have had paid are rates.

Make sure town development does not lead to hurting existing businesses. There are examples of traders in the marketplace competing with existing shop owners. Complement not supplement.

Meetings via zoom and recorded / minutes pls. Asynchronous is the way the world now is :)

More family support.

Parking.

Parking Costs are stopping people from coming in and removing the 3.00pm free parking will hit a lot of business as we get a lot of out of town customers that come in and do a few jobs late afternoon.

The eyesore that is the old House of Fraser.

The industrial estate, it would need to be a separate plan from the town centre, as the requirements are completely different.

There's not enough detail or clarity in your communications on which to make an informed decision.

This should be part of what Council should do with existing funds. Revenue from domestic rates has increased with so many new homes built. Rateable value has no bearing on how well each business in coping with the current climate. So will only add their struggles with overheads with this added costs each year.

This would appear to be another tax in addition to our business rates which we can ill afford at present. A BID is not necessary in Cirencester.

Undecided regarding the % age contribution towards a BID.

We are a charity – I would like to suggest that charities are exempt from the RV levy – or contribute a discounted amount. We would not be able to afford the levy as it stands and it does not directly support our charitable aims.

We would not want to pay for a BID this does seem a bit pointless when the chamber of commerce and the council should talk more and take more action.



