

LICENSING COMMITTEE

Date: Tuesday 30 July 2024

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Liz Smith, Democratic Services Officer on 01392 265425 or email liz.smith@exeter.gov.uk

Entry to the Civic Centre can be gained through the rear entrance, located at the back of the Customer Service Centre, Paris Street.

Membership -

Councillors Snow (Chair), Begley (Deputy Chair), Banyard, Bennett, Fullam, Haigh, Harding, Holland, Hussain, Miller, Parkhouse, Sheridan, Williams, M and Wood

Agenda

Part I: Items suggested for discussion with the press and public present

1 **Apologies**

To receive apologies from Committee members.

2 **Minutes**

To approve and sign the minutes of the meeting held on 19 March 2024.

(Pages 3 -
4)

3 **Declarations of Interest**

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item. Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

4 **Local Government (Access to Information) Act 1985 - Exclusion of Press and Public**

It is not considered that the Committee would be likely to exclude the press and public during the consideration of any of the items on this agenda but, if it should wish to do so, then the following resolution should be passed: -

RECOMMENDED that, under Section 100A (4) of the Local Government Act 1972, the press and public be excluded from the meeting for particular item(s) on the

grounds that it (they) involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs of Part I of Schedule 12A of the Act.

To pass the following resolution:

RESOLVED that, under Section 100A (4) of the Local Government Act 1972, the press and public be excluded from the meeting for items ? and ? on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1 and 2 of Part I of Schedule 12A of the Act.

5 **Working Group Representation**

To determine membership of the working groups:

- Taxi
- Licensing Act 2003

(Verbal
Report)

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976

6 **Street Trading Policy**

To receive results of the consultation and agree the revised policy.

(Pages 5 -
18)

Individual reports on this agenda can be produced in large print on request to Democratic Services (Committees) on 01392 265107.

LICENSING COMMITTEE

19 March 2024

Present:

Councillor Marina Asvachin (Chair)

Councillors Warwick, Begley, Fullam, Foale, Holland, Parkhouse, Rees, Sheridan, Snow, Vizard and Wood

Apologies:

Councillor Patrick

Also present:

Service Lead - Environmental Health & Community Safety, Principal Licensing Officer, Legal Advisor, Apprentice Solicitor and Democratic Services Officer (SLS)

4 **Minutes**

The minutes of the meeting held on 30 January 2024 were taken as read, approved and signed by the Chair as correct.

5 **Declarations of Interest**

No declarations of interest were made by Members.

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976

6 **Revised Street Trading Policy**

The Service Lead - Environmental Health and Community Safety presented the report which detailed a review of the Street Trading Policy, and a request for Members' approval to publish a draft for public consultation, before being considered for adoption by the Licensing Committee and Council. The report included the findings of the Street Trading working group made up of Members of the Licensing Committee, with contributions from expert witnesses and the Council's Licensing Officers.

There had been no changes in the legislation since the Policy was last approved in 2015, and so the deliberations of the working group had been very welcome and had resulted in a strengthening of ten areas of the Policy, which were set out in the report. It was anticipated that a further meeting of the working group would be held after the ten week consultation period had closed to consider the responses as well as a possible redesign of the street trading application form.

Councillor Warwick, as Chair of the Working Group had welcomed the opportunity to review the Policy and encouraged Members to comment on the circulated draft as part of the consultation. He thanked the Service Lead - Environmental Health and Community Safety and the Licensing team for their hard work in researching and drawing on best practice from other local authorities across the country.

Following discussion, Members proposed the following minor amendments to the draft Policy, which also reflected comments made at the working group and was agreed would be included in the draft document before publishing for consultation:-

Paragraph 6.5.2 - to read 'street trading consent will not be permitted if powered by a diesel or petrol generator '

Paragraph 6.5.3 – to be deleted.

Paragraph 15.5.2 – to read 'that no person under the age of 16 years shall engage or be employed in street trading, and those that under the age of 18 years shall be supervised at all times by an adult over the age of 18 years'.

Insert new Paragraph 15.9.3 – to read 'all street traders will be required to have arrangements in place for recycling and dealing with refuse. This will be required to be evidenced through their trade waste transfer note'.

To renumber the remaining paragraphs in Section 15.9.

Members also made particular reference to:-

- the aspirations of meeting the Council's net zero targets
- the avoidance where possible of single use plastics
- the list of licensed parks and open spaces as set out in the report was only indicative and further discussion with the Parks and Open Spaces team would be held.

A copy of the revised draft Policy for consultation would be attached to the minutes.

RESOLVED that the Licensing Committee agree to a consultation of the revised Street Trading Policy to run from 22 March 2024 until 31 May 2024.

7 **Councillor Steve Warwick**

The Chair requested an addendum to the minutes to note that the Councillor Steve Warwick would not be standing again for the Council in the forthcoming Elections. She expressed her thanks to him for being a supportive Deputy Chair of the Licensing Committee and wished him all the best in retirement from being a Councillor.

The meeting commenced at 5.30 pm and closed at 6.20 pm

Chair

REPORT TO LICENSING COMMITTEE

Date of Meeting: 30 July 2024

Report of: Service Lead – Environmental Health and Community Safety

Title: Revision of the Street Trading Policy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

- 1.1 A working group of the Licensing Committee made up of Councillors and Officers has been conducting a review of the Street Trading Policy. The purpose of the group was to reflect upon street trading in Exeter, how it is and what it should be like, and relate it to how it impacts upon the safety, vibrancy and choice within the city.
- 1.2 The Licensing Committee agreed to a consultation of the revised street trading policy which ran from 22 March 2024 until 31 May 2024.
- 1.3 This report presents the results of that consultation and asks that the policy is approved subject to any changes required as a result of the consultation.

2. Recommendations:

- 2.1 Licensing Committee consider the responses received to the consultation and determine whether there are any changes required to the proposed street trading policy as a result of the consultation responses.
- 2.2 Subject to 2.1 above recommend the policy for adoption with effect from 1st January 2025.

3. Reasons for the recommendation:

- 3.1 The street trading policy sets out the council's position in how it will administer applications for street trading consents in order to protect residents, customers and road users' safety whilst permitting well run businesses to provide services that are in demand and contribute to the local economy.
- 3.2 It aims to ensure that only those persons entitled to work and run a business are granted the consents to trade and that there is no detriment to the amenity of city and business locations, or residential areas created by the businesses being granted consents.
- 3.3 There have been no changes in the legislation since the updated policy was last approved in 2015.

3.4 This policy has been produced following the Licensing Committee setting up a member led working group to revise the policy in line with the Council's current corporate objectives and best practice from other authorities.

4. What are the resource implications including non financial resources

4.1 There are no direct financial implications within this report.

4.2 Any costs associated with street trading are recovered through the fees set for the Street Trading Consents application and determination process.

5. Section 151 Officer comments:

5.1 There are no financial implications contained in this report.

6. What are the legal aspects?

6.1 On 15th March 1983 the Council resolved to adopt Schedule 4 of the Local Government (Miscellaneous Provisions) Act 1982, "The Act", for the whole of its area which allows for the Council to adopt 'streets' in which trading requires the consent of the Council. This is the means of regulating street trading within the Council's area. On the 15th February 2011 the Council resolved to designate all streets in the Exeter City Council jurisdiction as 'Consent Streets' with the exception of a number of streets that are classified as either 'Licensed' or 'Prohibited'.

6.2 Schedule 4 of the Act sets out the legal definition of street which includes any road, footway, beach or other area to which the public have access without payment. The Act also defines Street Trading in Schedule 4 paragraph 1 (1) as the selling, or exposing or offering for sale, of any article (including a living thing) in a street.

6.3 The powers set out in Paragraph 7 of Schedule 4 of the Act provides for the Council to have a broad discretion as to whether to grant a consent and if so on what terms.

6.4 There is no statutory requirement to consult upon and or adopt a street trading policy however it is considered best practice to adopt such a policy and where the Council consults on such matters it must do so properly in accordance with the principles in the case of R v London Borough of Brent ex parte Gunning [1985] LGR 168. The principles are a) consultation must be carried out when proposals are in a formative stage, b) sufficient information is provided for intelligent consideration, c) adequate time must be given for a response and d) the product of the consultation must be conscientiously taken into account in making the decision.

7. Monitoring Officer's comments:

Members will note the content of this report and the legal comments above concerning the consultation which has taken place in order to inform the review of the Council's Street Trading Policy.

8. Report details:

8.1 The Licensing Committee set up a working group to reflect upon street trading in Exeter, how it is and what it should be like, and relate it to how it impacts upon the safety, vibrancy and choice within the city.

8.2 The Licensing Committee agreed that the review should focus on the following:

- To review the existing Street Trading Policy to determine what is or is not working well within the Street Trading Policy;
- Where could the Street Trading Policy be altered to increase vibrancy and choice;
- What good practice is there from other authorities and what lessons can be applied to develop Exeter's Street Trading Policy;
- How does Exeter's Street Trading Policy fit in with the Council's Strategic Plan.

8.3 The working group met on several occasions over the last 18 months, speaking to a number of expert witnesses regarding street trading in areas such as the city centre and in Public and Green Spaces. The group also carefully considered the difference between the Street Trading Policy and the City's Market Charter.

8.4 Following extensive research from Councillors and Officers, the revised policy presented with the report for consultation have focused on ten areas where the working group felt the policy either needed to be strengthened or required an update since the policy was last updated. These are: -

- a. **Mandatory requirement for basic DBS Checks on applicants and staff** – in line with other Council's, the working group felt strongly that DBS checks should be introduced to enhance the Council's role in maintaining public safety.
- b. **An assessment framework for officers to be completed as part of the application process** – Birmingham City Council had an effective scoring matrix to be able to assess all applications in a consistent and transparent manner. This assessment would then be presented as an appendix to the reports pack, to aid the Licensing Sub Committee in determining all initial applications.
- c. **Enhanced health and safety requirements** – the working group were keen to see an enhanced focus on all aspects of health and safety, but in particular with respect to gas and electrical safety. Therefore, a number of mandatory requirements have been proposed to ensure that safety checks are being conducted.
- d. **Schools and Educational Establishments** – the working group were keen that the policy should provide greater clarity with respect to trading around schools and educational establishments. The proposed policy seeks to prohibit any trading within a 250m radius of a school between Monday to Fridays 08:00 and 16:00 hrs during term times.
- e. **Emissions Standards** – the Council has a clear aspiration to be Net Zero by 2030. As part of this aspiration, it is seeking that its policies are also seeking to meet the same commitment. Therefore, the policy sets out a proposal for all Street Traders to be zero emissions by 2030.

- f. **Enhancement of Green Spaces** – the policy seeks to remove key green spaces from the Policy so that the operational team responsible for these areas will become responsible for authorising traders within these locations. This seeks to enhance the vibrancy and safety of these locations and prevents traders that wish to use these areas from having to obtain both a licence from the operational teams and licensing, thereby removing cost and duplication.
- g. **Power Sources** – Exeter City Council has committed to the principles of Net Zero 2030. Therefore, preference will be given to applications that are able to demonstrate using renewable energy sources and reducing carbon emissions, particularly whilst idling.
- h. **Greater diversity in food offering** – The proposed policy will see a preference given to those applicants offering locally sourced food, include plant-based food in their menus and diverse food offering for customers.
- i. **Waste Management** – the revised policy seeks to ensure that correct waste management arrangements are in place and litter resulting from the street trading consent is cleared away. The revised policy is seeking applicants to demonstrate recycling of waste wherever possible.
- j. **Clear guidance regarding horns and chimes** – to reduce annoyance on communities, clear guidance has been drawn up regarding horns and chimes used by mobile traders.

8.5 The consultation ran from 22 March 2024 until 31 May 2024 (10 weeks). All those with a current consent to street trade were written to as well as several identified statutory partners and other stakeholders that had been identified. Information was published on the Council's consultation web pages and a notice was also published in the local newspaper.

8.6 A full list of all responses received is attached as Appendix A, along with comments to those responses.

9. How does the decision contribute to the Council's Corporate Plan?

9.1 The policy recognises the importance of street trading to the city and that it can add to the vibrancy and vitality contributing positively to the Council's corporate plan of a prosperous local economy, healthy and active city, building great neighbourhoods and communities and a net zero carbon city.

10. What risks are there and how can they be reduced?

10.1 The main risk is not to have an open and transparent consultation process where those persons affected by the proposed policy have an opportunity to have an input into it.

10.2 To minimise this risk a Consultation Plan is set out at Appendix A and the consultation results will be presented to the Licensing Committee on 30 July 2024.

11. Equality Act 2010 (The Act)

- 11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:
- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
 - advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
 - foster good relations between people by tackling prejudice and promoting understanding.
- 11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.
- 11.3 In making decisions the authority must consider the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.
- 11.4 In recommending this proposal, positive impacts have been identified with respect to those with disabilities and those in vulnerable age groups.

12. Carbon Footprint (Environmental) Implications:

- 12.1 The policy review seeks to have positive carbon/environmental impacts arising from the revised policy.

13. Are there any other options?

- 13.1 An option that the Council could take is un-adopting the relevant legislation so there is no control over street trading within the city. Whilst this would remove regulation it would also remove any control of standards and would allow any trader to trade on land where the prior permission of the landowner is not required, or they have the consent of the landowner.
- 13.2 Excluding some streets that are currently consented. To achieve this would require the council to go through the requisite legal process. This would mean that unless designated as prohibited anyone could trade in these areas. For areas where the prior consent of the landowner is required this could be potentially regulated through robust booking procedures but would mean anyone could trade on streets where permission is not required
- 13.3 In the main the de-regulation options will mean the Council has less ability to protect public safety and prevent adverse impacts on premises-based businesses and residents in the City.

Director: David Bartram

Author: Simon Lane, Service Lead – Environmental Health and Community Safety
Nigel Marston, Principal Licensing Officer

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

- Local Government (Miscellaneous Provisions) Act 1982

Contact for enquires:
Democratic Services (Committees)
Room 4.36
01392 265275

Appendix A – With Comments

Date received	From Whom	Comment	Change to Policy required
13.04.2024	Robert Grinter	Is there evidence that the situation on the ground calls for such a daunting array of regulation?	Street Trading regulations are already in force. The policy merely states how ECC will implement the existing regulations and ensure the policy remains fit for purpose as we move towards ECC's stated desire of being Net Zero by 2023
21.03.2024	Flour and Flame	<p>Thanks for this. We broadly agree with all of the updates.</p> <p>Sorry if I missed it in the policy but I think you could go further with waste management systems and enforce compostable or recyclable materials be used to contain any takeaways. There are also many options for food waste disposal which would surely go towards achieving net zero by 2030 which could be applied to street traders / all food outlets.</p>	Members to consider whether to add a condition to street trading consents in relation to the use of compostable and recyclable containers to strengthen 6.10.2
25.03.2024	The Creperie	<p>I have been happily making and selling crepes in Castle Street since 1989. I do have a few comments to contribute to this consultation insofar as it affects our little area.</p> <p>My main concern is that, throughout this time, there has been a worrying lack of continuity in the administration of our little enclave. Decisions are made and then not passed on to subsequent licensing officers or councillors. I would like this to be addressed.</p> <p>I pushed, many years ago, for there to be a mandatory ban on the use of diesel generators. This was initially turned down (late 1990s), then verbally agreed (early 2000s), then agreed in writing (2015,2016), then again in writing (Feb 2019), then probably agreed (conversation with Nigel Marston). What is the policy here and can this be recorded and passed on to any new officers/councillors. Surely by now we can agree that belching out carcinogenic particles in an area where people like to relax and spend time is totally unreasonable.</p>	Covered in the policy at 6.5

		<p>An application was made, some years ago, for Indian Street Food. I discovered that the application was for dosas - an Indian rice pancake. I made Lee Staples, the then head of licensing, aware of this and he ensured that dosas were removed from the application. Has this been recorded for any future applications? Surely not good either for me or the City Centre to duplicate food in this way.</p> <p>When new applications are made could it be mandatory for the existing outlets to be consulted? And in good time? This has certainly not been the case hitherto. Having this as a compulsory requirement would avoid the unfortunate incidents above and also, possibly, having seen a succession of outlets fail over the years (as was pretty obvious before they started) our comments could be useful. It is absolutely in everyone's interest to have good quality, well-presented outlets in our area that contribute something positive and different to city centre life.</p> <p>When I started in 1989 it was made clear to me that Council policy was to have affordable food in the City Centre, with outlets run by local people, not chains. Can we be reassured that this preference for local, independent businesses form part of the official policy.</p> <p>I don't have many comments to make about the specific areas outlined in your email:</p> <p>Points e and g. I used to have a solar panel which helped charge the batteries which run my fridge and lights. It would not be possible to run my crepe machines in this manner.. I would always need to use gas. Zero emissions great but I would like to see the caveat inserted 'where possible'.</p> <p>Point c. A gas safety certificate is already a mandatory requirement and is checked when we have our Food Safety inspection</p> <p>Point i. Yes, please ensure that all outlets provide a bin and that this is available for customers to use THROUGHOUT the day, not just now and then!</p>	<p>Covered in the policy at 6.10</p> <p>Covered in 7.1.1</p> <p>Covered in 15.7.4</p> <p>Covered in 15..9.2</p>
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		I am in broad agreement with all the points mentioned and thank you for giving me the chance to make my views known. Please keep me informed of any relevant developments.	
24.05.2024	Jane Brandon	<p>I am broadly in agreement with the draft policy with the exception of the following proposed changes:</p> <p>(a) mandatory requirement for DBS checks on applicants and staff - this is unnecessary and over the top. Staff working in street trading/catering rarely interact with children or vulnerable people on their own. I would suggest this is only necessary for establishments that are working near schools or in rural areas where customers are more isolated.</p> <p>(c) All trading establishments have to have annual gas and electrical safety checks to adhere with their insurance requirements and many will also have to adhere to them as part of the private rental agreement if they are on private land (as we do from Retail Concessions who act on behalf of B&Q plc). You could ask for copies of these annually at the annual licence renewal?</p> <p>(e) and (g) emissions standards and power sources - how on earth is any street trader supposed to be zero emissions by 2030? By their very nature of being 'street traders' the vast majority rely on petrol/diesel or gas generators to operate without a mains electricity connection. I can't see solar panels generating anywhere near enough power to support cooking, refrigeration and hot water supplies. This is absolutely unachievable unless mains power supplies are provided to all street trading locations.</p>	<p>Members to make a decision on this point.</p> <p>Covered in 15.7.4</p> <p>The Council has set clear aspirations to become Net Zero by 2030. Industrial rechargeable battery packs are already available and can also be connected to solar panels. No change to policy required.</p>

<p>31.05.2024</p>	<p>Refuel</p>	<p>Having reviewed the Draft Street Trading Policy I believe it is very long winded and does not lend itself to the roving / mobile street trader. It feels like roving traders have been bolted on to this policy as prior to November 2022 we were allowed to operate without licences. I agree that we should comply with obtaining a licence as it is a way of regulating this industry and ensuring only legitimate businesses are trading. Likewise I can not understand why if a business has requested a food hygiene rating there isn't an immediate referral to the licensing department if they are operating outside of a premises, I.e. street trading.</p> <p>Mobile / roving traders and static street traders are completely different entities. A mobile / roving trader will have a premises and staff with all the accompanying rent, rates, bills and costs. Therefore there should be a different pricing structure to reflect this as a static trader's fee is effectively rent for their pitch. The majority of the other councils in the South West charge a fraction of the cost, compared to Exeter City Council, for a street traders licence for a roving trader.</p> <p>I feel that there should be a street traders association where we have the opportunity to be consulted and have a direct line of communication with the council on these matters.</p>	<p>Roving traders have always been covered by the Street Trading Policy. The business may not trade in our area. We have many mobile business that are required to register as Exeter is there home address. However they do not trade in Exeter or indeed only trade at events where a Street Trading Consent is not required.</p> <p>Fees were changed in 2024 to reflect this. A mobile trader pays the same as any other street trader and then £200 per each additional unit they operate.</p> <p>This would be for the traders to set up.</p>
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Equality Impact Assessment: *Adoption of a revised Street Trading Policy*

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Licensing Committee – 30 July 2024	Adoption of the Street Trading Policy	Adoption of the Policy	Consent holders, resident, businesses and consumers.

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low**

assessment is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).			It is not considered that the policy will have the potential for impact on this protected group(s)
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Positive	Low	<p>This draft policy has a positive impact as it introduces a DBS checking system for applicants and staff and a higher emissions standard which can affected people in vulnerable age groups who are immune compromised.</p> <p>It is recognised that any obstructions on the highway have the potential to impact on accessibility, and that at times parts of the city are already crowded by both people and street furniture. All applications require approval of location and layout of associated furniture. This is considered by Highways where necessary and this consultation and approval is specifically designed to prevent any adverse impacts of accessibility.</p>
Sex/Gender			It is not considered that the policy will have the potential for impact on this protected group(s)
Gender reassignment			It is not considered that the policy will have the potential for impact on this protected group(s)
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).			It is not considered that the policy will have the potential for impact on this protected group(s)

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Sexual orientation (including heterosexual, lesbian, gay, bisexual).			It is not considered that the policy will have the potential for impact on this protected group(s)
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive	Low	This draft policy has a positive impact as it affords extra protections around schools, introduces a DBS checking system for applicants and staff and a higher emissions standard which can affected people in vulnerable age groups who are immune compromised.
Pregnancy and maternity including new and breast feeding mothers			It is not considered that the policy will have the potential for impact on this protected group(s)
Marriage and civil partnership status			It is not considered that the policy will have the potential for impact on this protected group(s)

Actions identified that will mitigate any negative impacts and/or promote inclusion

Officer: Simon Lane
Date: 25 June 2024

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