

DRAFT

Way Finding Way-board Licensing Eligibility Criteria and Guidance

Purpose

Advertising Boards (A-boards) are not permitted within the City of London. A-boards can be an obstruction and hazard if not placed correctly, especially for disabled people.

Under UK legislation, businesses must obtain permission from the highway authority before placing A-boards on public footways or carriageways. The **Highways Act 1980 (Section 137)** prohibits any obstruction of the highway without lawful authority, which includes the unauthorised placement of advertising boards. Local authorities may issue specific conditions for A-board use, such as maintaining clear pedestrian access and ensuring boards are stable and removed outside trading hours.

The **Provision of Services Regulations 2009** requires that fees charged by a competent authority for authorisation schemes under an authorisation scheme must be reasonable and proportionate to the cost of the procedures and formalities under the scheme and must not exceed the cost of those procedures and formalities. Such fees should also be justified and transparent.

The introduction of a licensing system for wayfinding A-boards ("Way-boards") would allow businesses with demonstrated need to apply for a licence, thereby supporting their visibility provided they do not reduce accessibility or compromise the safety of public highways, walkways, or public spaces in the City.

General Principles

The Way-board Licensing Guidance will be applied to all businesses applying for a licence to place an A-board on the public highway, walkways, or public spaces within the City.

- All Way-boards must be licensed.
- Way-board licences will be granted based on strict criteria and will not be automatically granted. Businesses are required to apply for a licence and provide a detailed justification for the necessity of a Way-board.
- Accessibility and safety will be prioritised over wayfinding.
- Way-board placement should not impede access for people walking and wheeling and should maintain a safe and accessible streets and public realm.

To further clarify the distinctions between Way-Boards and Advertising Boards Table 1 highlights the key differences in purpose and public benefit.

Table 1: Wayfinding vs. Advertising Boards: Key Differences

Aspect	Wayfinding Board (Way-board)	Advertising Board (A-board)
Purpose	To help people navigate to a business or service (e.g., directions or map)	To promote a business, product, or service.
Public Benefit	Improves navigation and orientation	Primarily benefits the business
Placement	Strategically placed for navigation purposes	Outside business premises

Way-board Application Guidance

The following Eligibility Criteria outlines the necessary licensing conditions for businesses wishing to apply for a Way-board license.

For the purposes of this policy, an “alleyway” or “passage” is defined as a narrow pedestrian route that is not considered a main street. Such routes usually run between or behind buildings and may be covered or uncovered. They allow access to buildings that do not front onto a main street.

A “courtyard” refers to an open, often shared space located on the public highway, situated behind or between buildings. It is typically not visible from a main street and is usually accessed via an alleyway or passage. Courtyards may be enclosed or partially enclosed and are generally accessible to the public, unless otherwise restricted

1. Eligible Businesses

To apply for a Way-board licence, you must be a business:

- located within the City of London and is situated away from primary streets and main thoroughfares, such as within alleyways and passages or courtyards.
- that does not have direct frontage onto the main street and has no other means of displaying street-level signage.
- that can demonstrate that its visibility and customer footfall are, in part, reliant on passing trade. This must be supported by evidence such as photographs or diagrams showing limited visibility from the main street, thereby reinforcing the need for directional signage.

Examples of eligible businesses may include:

- A business located in a courtyard behind a main shopping street.

- A business accessed via a narrow alleyway with no direct street-facing windows or signage.
- A business situated in a mews or passageway with limited visibility from the main thoroughfare.

2. Way-board Eligibility Criteria

2.1 Size and number

The following guidelines must be adhered to in relation to number and size:

- Each business is permitted to display one Way-board; however, businesses located down alleyways or courtyards with more than one distinct entrance may be permitted additional Way-boards provided they justify this and meet the other eligibility criteria
- In cases where multiple businesses plan to apply for a Way-board at a single location, they should consider (or the City Corporation will determine) the possibility of consolidating multiple business listings on a single board to reduce clutter and enhance clarity.
- Each Way-board should be no more than 850 mm high and 550 mm wide, including the supporting structure. The depth of the Way-board usually ranges between 500 to 600 mm to ensure stability. The base's width must provide enough stability to prevent the way-board from easily tipping over.
- Way-boards must be detectable by white canes (e.g. solid base). The base must be made of solid, non-flexible materials such as metal or heavy-duty plastic and the base should be at least 150 mm high to ensure detection by white canes.

2.2 Design and information

To ensure that Way-boards serve their primary function of wayfinding, a thoughtful approach must be taken in relation to design and information:

- Way-boards must contain only way-finding information to assist individuals in navigating to the business.
- Businesses may incorporate brand elements, such as the business name, logos, and colour schemes, into way-finding information in a manner that complements rather than detracts from the primary function of the Way-board.
- Businesses must use universally understood symbols and arrows to guide individuals to the business location.

- Way-boards should have high-contrast signage to ensure that wayfinding information is clear and visible, using high-contrast colours to make text easily readable for everyone, including those with visual impairments and avoiding flashing lights or confusing designs for neurodiverse individuals.

2.3 Proposed location and accessibility

The proposed location of the way-board must be indicated on the application form and should preferably be situated near a building line. This approach minimises the risk of obstructing people walking and wheeling pathways and reduces potential hazards.

The following guidelines must be adhered to in relation to number and size:

- There must be a minimum residual width of 2 metres of unobstructed footpath for the passage of people walking and wheeling.
- Way-boards should be placed against (physically touching) a building or business where possible
- Way-boards must be placed on straight sight lines and not on any curved angles along the building line and not in the sight line of any crossing points.
- Way-boards must not obstruct access, and should not be placed within 2m of:
 - Tactile paving.
 - Dropped kerbs
 - Bus stops or crossings
 - Street furniture
- Way-boards must not be of a rotating or swinging banner/flag type.
- Way-boards placed on the highway must not be fixed or attached to any street furniture, lamp poles, signposts etc. and must not have other 'things' attached e.g. balloons and streamers.
- Way-boards must be taken in or removed from the footpath when the business is closed.
- Way-boards which have fallen over must be immediately removed or made secure to ensure the above criteria are met.

2.4 Potential Impacts and equality considerations

An Equality Impact Assessment will be undertaken by the business as part of the application process, and City Corporation officers review these. Applicants will be asked to consider how placement and use of Wayboards might affect people with protected characteristics. For example: obstructions to walking and wheeling pathways, proximity to tactile paving or dropped kerbs, visual clutter, etc.

This process ensures businesses assess Way-board placement to avoid creating obstacles for disabled people, parents with prams etc. and will insure these are mitigated to public spaces remain accessible, inclusive, and safe for everyone. An example of what could look like is shown in Table 2.

Table 2: Example response to the Way-board Placement Equality Impact Assessment consideration

Equality consideration	Potential Impact	Mitigation Measures	Applicant	City Corporation
Obstruction to walking and wheeling	Risk of narrowing footway, affecting wheelchair users and parents with prams	Way-board will be placed flush against the building line, leaving at least 1.8m of clear footway	<i>The total footway width at the proposed location is 3.2m. The Way-board will be positioned directly against the building line, ensuring a 2m unobstructed path remains.</i>	<i>This was confirmed using a tape measure at a site visit</i>
Proximity to tactile paving or dropped kerbs	Could interfere with navigation for visually impaired individuals	Board will not obstruct tactile paving or dropped kerbs. A 1m buffer will be maintained.	<i>There is no tactile paving or dropped kerb nearby so a buffer will be maintained to ensure accessibility and safety for all pavement users.</i>	<i>A site inspection confirmed that the nearest tactile paving is 3m away and the closest dropped kerb is across the street.</i>

3. Way-board license fees and appeals process

A Way-board License will cost £xxx.

- Application fee of £xx (non-refundable, paid upfront)
- License fee of £xxx (paid after approval, before the licence is issued)
- This licence is valid for 2 years
- License Fee's will be reviewed every four years

Applications that do not satisfy the Way-board eligibility criteria will not be granted a license. Business owners who receive this decision retain the right to appeal.

Step 1: The business owner must submit a written notice of appeal within 14 days of receiving the notice that their application has been declined. The notice of appeal must include the grounds for the appeal and any supporting evidence.

Step 2: Upon receipt of the notice of appeal, an independent panel will review the case, and all evidence submitted within 30 working days. This will be the decision of the Director of City Operations. All decisions made by the panel will be documented and made available to the public to ensure transparency in the decision-making process.

Step 3: The panel will issue a written decision within 14 days of the hearing. The decision will include the findings of fact, conclusions and the reasons for the decision. The panel may affirm, modify, or reverse the decision to give a Way-board license. The decision of the panel is final and binding. No further appeals will be entertained.

4. License enforcement and public feedback

Way-boards will be enforced through regular inspections by street enforcement officers to check for valid licenses.

- Non-compliance may lead to Fixed Penalty Notices (FPN) or license revocation.
- Appeals will follow FPN guidelines.

Appendix 1 outlines the proposed Terms and Conditions.

A key aspect of this initiative is creating clear ways for the public to contact the City Corporation about Way-boards via email, telephone and potential street reporting applications. This ensures anyone can report Way-boards that obstruct or affect navigation in the City.

Appendix 1: Draft Terms and Conditions for proposed Way-Board Licensing

City of London Corporation Proposed Way-board Licensing Guidance Section 149 Highways Act (1980)

Your business appears to have placed an item (including Advertising boards or Way-board) on the public highway outside your premises. Advertising boards or A-boards are not authorised in the City of London. Way-boards are permitted for eligible businesses who hold a way-board licence only.

Enforcement action will be taken where any of the following criteria are not met when holding a Way-board Licence:

- There must be a minimum residual width of 2 metres of unobstructed footpath for the passage of pedestrians.
- No more than one item (Way-board) per business.
- Items must be no more than 850mm in height, 550mm in width, and 600mm in base or footprint.
- Items must be high-contrast so they are easily visible and should not be mirrored or reflective.
- Item must be detectable by white canes (e.g. solid base). The base must be made of solid, non-flexible materials such as metal or heavy-duty plastic and the base should be at least 150 mm high to ensure detection by white canes.
- Items should be placed against (physically touching) a building line and must not obstruct access, they should not be placed within 2m of:
 - Tactile paving.
 - Dropped kerbs
 - Bus stops or crossings
 - Street furniture
- Items must be placed on straight sight lines and not on any curved angles along the building line and not in the sight line of any crossing points.
- Items must not be of a rotating or swinging banner/flag type.
- Items placed on the highway must not be fixed or attached to any street furniture, lamp poles, sign posts etc. and must not have other 'things' attached e.g. balloons and streamers.
- All items, including Way-boards must be taken in or removed from the footpath when the business is closed.
- Way-boards which have fallen over must be immediately removed or made secure to ensure the above criteria are met.

Items (Way-boards) that are deemed to be a danger, which are placed on the highway whether because the above criteria are not met or for any other reason will be removed without notice by the City of London Corporation's Street Environment Officers.

Any business placing items on the public highway does so at their own risk and may be liable, in the event of injury, loss or damage being caused to a highway user.

Advertising is subject to advertising control and the local planning authority may enforce against and remove unauthorised Way-boards which do not have advertising consent. The local planning authority's policy is to resist excessive or obtrusive advertising.