



Equality Impact Assessment – A-board Policy update and Way-board eligibility

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Proposal Title	A-Board Policy update – To allow Wayboards
Details of the lead officer completing the Assessment	Andrea Larice, Strategic Transport
Department Responsible:	Environment, City Operations, Strategic Transport
Who has been involved in creating the EQIA: (please summarise/list stakeholders you have engaged with and how)	City Corporation Highways Team City Corporation Parking Team City Corporation Transport Strategy Team
Date of Initial assessment:	<p>This EQIA evaluates and reviews the proposed modifications to the Red Badge holder policy, aiming to gain a comprehensive understanding of their potential impacts.</p> <p>Version 1 of this EQIA was issued in July and subsequently updated in September 2025.</p>
Date of next review	Should members proceed with this option an evaluation of this EQIA should be conducted in accordance with the public consultation, implementation of the Policy, and after the successful implementation of the Policy.

1.PROPOSAL OVERVIEW

The [City of London Corporation's Transport Strategy 2024 Second edition](#) sets out our approach to improving accessibility in the Square Mile (Outcome 3: The Square Mile is accessible to all). The removal of A-boards is included in Proposal 16: Keep pavements free of obstructions. This proposal supports the Public Sector Equality Duty (PSED) by ensuring that public spaces are accessible and non-discriminatory, fostering inclusivity and equality, and our commitment to Transport for All's Equal Pavements Pledge.

In March 2020, the Planning & Transportation committee approved a City-wide ban of A-boards. However, the implementation was delayed during the COVID- 19 Pandemic and to allow time for footfall to recover post-pandemic (Appendix 1). As footfall in the City of London increases and the working population rises, maintaining clear pavements is crucial for creating an inclusive environment that allows people to navigate our streets independently and safely.

In December 2024 officers conducted a City-wide study to identify the distribution, location, and purpose of A-boards. This identified A-boards or similar obstructions at 830 out of 1,994 surveyed sites, representing 42% of the total locations, with the majority (93%) serving exclusively as advertising tools with no wayfinding element. 75% of A-boards were positioned on public highway. This widespread use of A-boards on public highways poses challenges for maintaining clear, safe and accessible pavements. Based on the findings of the study, an internal review was conducted to understand how teams would react to the request to remove A-board and determine the feasibility of a licence-based system for the businesses using A-boards for wayfinding without visible frontages (Appendix 2).

This EQIA examines the potential impacts of a policy change regarding A-boards for wayfinding.

The proposed update includes keeping the current ban on advertising A-boards throughout the City of London, while exploring the possibility of introducing a licensing system for Wayfinding A-boards ("Way-boards") under certain conditions.

The purpose of this approach is to consider both public highway accessibility and safety, as well as business requirements for directional signage. The EQIA evaluates how these changes may affect individuals with protected characteristics.

Purpose of the Policy Change

The City Corporation plans to revise its A-board policy to:

- Continue the City-wide ban on advertising A-boards.
- Establish a licensing system for Way-boards in select cases where wayfinding is considered essential and accessibility can be preserved.

Legal framework

Highway authorities have duties to protect the use of the highway for all, including some extra provision for disabled people. All of these are listed here. Under legal advice we are proposing to use Highways Act 1980 (Section 137), and our duties under the Equality Act.

- 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. Therefore, no A-boards are on street with permission at present.
- Under the **Town and Country Planning (Control of Advertisements) Regulations 2007**, A-boards are classified as advertisements and may require express consent from the local planning authority. Even where deemed consent applies, authorities retain the right to restrict or revoke permission based on public safety or amenity concerns. Failure to comply with these requirements may result in enforcement action or removal of the boards.
- There is a reasonable risk that not removing A-boards would breach the Highways Act 1980 (Section 130): The City Corporation has a duty to assert and protect the rights of the public to use and enjoy the highway. A-boards that obstruct pavements may breach this duty, particularly if they impede access for disabled people or create hazards.
- There is a reasonable risk that not removing A-boards would breach the Equality Act 2010 (Section 20(4)): Public bodies must make reasonable adjustments to avoid placing disabled people at a substantial disadvantage. Allowing A-boards to obstruct pavements could be seen as a failure to meet this duty, especially if it affects wheelchair users or people with visual impairments. Inconsistent enforcement or failure to act could expose the City Corporation to legal action from individuals or advocacy groups, particularly under the Equality Act or Highways Act.

Potential impacts of introducing a Wayboard Licencing system.

The placement of A-boards on footways, even in limited numbers may adversely affect individuals with disabilities by obstructing pathways, creating potential tripping hazards, and complicating navigation—particularly for those who are blind or partially sighted. Such boards may also impede tactile paving and diminish the clarity and equality of pedestrian routes.

While increased visibility of local services may offer some benefits to older adults, there remains an elevated risk of trips and falls associated with reduced mobility or declining vision. Regarding pregnancy and maternity, although no direct impacts are identified, narrowed walkways can still present challenges for individuals using prams or mobility aids.

Disabled people, particularly those who are blind or partially sighted, wheelchair users, and individuals with mobility impairments, are most susceptible to the adverse effects of A-boards situated on public highways. Inappropriately placed signage can act as physical barriers, reduce navigable space, and introduce additional tripping hazards. Older adults, children, and those who are pregnant or accompanied by prams may also be disproportionately affected by congested or restricted footways.

Furthermore, the presence of A-boards on pavements can considerably decrease available walking space, occasionally compelling pedestrians to step into the carriageway to bypass obstacles. This situation not only poses safety risks but also compromises independent movement for all pedestrians, including those without disabilities. Inconvenience, increased stress, and greater risk may result from navigating cluttered walkways. Consequently, maintaining clear and accessible pavements is paramount to ensuring safety, dignity, and equal access for all members of the community, irrespective of their protected characteristics.

Although the presence of A-boards may have negative impacts —particularly for individuals with disabilities, older adults, parents with prams, and others with mobility challenges—these impacts can be effectively mitigated by implementing a strict licensing policy combined with robust enforcement measures. By establishing clear and stringent criteria, such as maintaining a minimum 2metre unobstructed footway, requiring high-contrast, cane-detectable signage, and ensuring that A-boards are positioned only where accessibility will not be compromised, the risks can be substantially mitigated.

Regular monitoring and responsive enforcement will ensure compliance, while ongoing public engagement and accessible reporting channels will allow issues to be identified and addressed promptly. Although no direct negative impacts have been identified for other protected groups, including those defined by race, religion, gender, or sexual orientation, continued assessment will help guard against potential indirect discrimination. With such safeguards in place, the adverse effects associated with A-boards can be effectively managed, balancing the needs of businesses with the imperative for accessible, safe, and inclusive public spaces for as many people as possible. Therefore, keeping pavements clear and accessible is vital to ensuring safety, dignity, and equal access for everyone, regardless of their protected characteristics. While A-boards may negatively impact disabled people, older adults, parents with prams, and others with mobility challenges, these risks can be effectively managed through a robust licensing policy and strong enforcement.

In summary, the introduction of a City-wide ban, coupled with a rigorous licensing framework for essential Way-boards, aims to reduce physical obstacles. Continued monitoring and active public participation are crucial to implementing and maintaining a policy that is both equitable and effective, thereby supporting the core values of equality and inclusion within the City's public spaces.

2. EVIDENCE AND IMPACT ANALYSIS

Introduction

A-boards, or Advertising boards, are typically used by businesses to advertise and promote their services. Constructed as simple standalone boards mounted on heavy 'A'-shaped frames, they are placed across pavements to attract attention. Their size and style can vary widely, reflecting the diversity of business activities across the City.

A-boards often narrow the pavement and can create significant obstructions for pedestrians. Many campaigning organisations have called for a complete ban on A-

boards, emphasising that clear, unobstructed routes are critical for elderly people, blind and partially sighted individuals, and those using wheelchairs or mobility aids.

Concerns about A-boards have been raised by the Royal National Institute of Blind People (RNIB) representing people who are blind or partially sighted. They note that a proliferation of A-boards can make it difficult to navigate pavements safely, often forcing individuals to manoeuvre around obstacles or risk stepping into the road. Encounters with A-boards can lead to injury or undermine the confidence and mobility of people with vision impairments, restricting their independence and ability to participate fully in community life.

Transport for All (2014) also highlighted that *“Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users, and older people too. Transport for All welcome this ‘zero-tolerance’ approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle.”*

While hybrid policy approaches—allowing A-boards on wider streets, for example—have been considered to balance business demands with pedestrian safety, the City’s narrow footways and high pedestrian volumes have made such policies inequitable. Permitting A-boards on some wider streets, like Cheapside, could disadvantage traders on narrower lanes such as Bow Lane, undermining fair competition. This issue was raised in a 2014 Planning & Transportation Committee paper, which also referenced complaints from traders and informed subsequent policy discussions.

Reflecting these concerns, in March 2020, the Planning & Transportation Committee approved a City-wide ban of A-boards. However, enforcement implementation was postponed due to the COVID-19 pandemic and the need to allow footfall in the City to recover in the post-pandemic period. City pavements and footways are seeing rising use, with current foot traffic at 70% of 2019 levels. The Greater London Authority forecasts a 14.2% increase in City of London workers by 2041. The historic layout of many City streets contributes to the challenge, with several areas featuring particularly narrow pavements. Negotiating these footways can be especially difficult for wheelchair or mobility scooter users and parents with buggies. When A-boards are present, the lack of sufficient pavement space may force pedestrians to step into the carriageway to pass by. Maintaining accessible pavements is crucial to ensure safe and independent movement for all.

Data considerations and limitations

Pregnancy and Maternity

ONS Conception Statistics for England and Wales, 2020, present conception data for the City of London and the London Borough of Hackney together to ensure confidentiality.

In 2020, there were 5,659 conceptions recorded in Hackney and the City of London. This corresponds to a conception rate of 74.6 per 1,000 women aged 15 to 44 years, marginally higher than the Inner London average (66.1) but below the overall London average (76.2).

It is important to note that this data may not fully represent the majority of pregnant women in the City who may be impacted by the proposed change, as many commuters and visitors are regularly present in the area rather than being permanent residents.

Age

The Office for National Statistics (ONS) 2021 population statistics for the City states a total population of 8,580 for the borough. The age breakdowns for the City and London are detailed in Table 1 below:

Table 1: Age Breakdown for City and London (Source: ONS Census Data 2021)

Age	City of London (%)	Greater London (%)
Total: All residents	100.0	100.0
Aged 4 years and under	2.5	6.0
Aged 5 to 9 years	1.9	6.0
Aged 10 to 15 years	2.4	7.2
Aged 16 to 19 years	2.1	4.4
Aged 20 to 24 years	11.2	6.7
Aged 25 to 34 years	25.8	18.1
Aged 35 to 49 years	21.2	22.7
Aged 50 to 64 years	18.8	16.9
Aged 65 to 74 years	8.3	6.5
Aged 75 to 84 years	4.4	3.8
Aged 85 years and over	1.4	1.6

The data highlights notable differences in the age distribution between the City of London and Greater London. Specifically, the City has a markedly smaller proportion of residents under the age of 15, at just 6.8%, compared with 19.2% in Greater London. In contrast, the City records a slightly greater percentage of individuals aged 25 to 34 years, as well as those aged 65 and over, relative to the broader Greater London area (ONS, 2021 and City of London Corporation, 2023b)

Table 2: Workforce Age Structure, City and Greater London 2011 (Source: City of London Workforce CENSUS 2011- Analysis by Age and Occupation)

Age	City of London Actual	City of London %	Greater London Actual	Greater London %
16 - 19	2,521	1	81,959	2
20 - 24	26,806	8	387,569	9
25 - 29	67,481	19	685,431	15
30 - 34	70,450	20	697,643	16
35 - 39	56,574	16	591,814	13
40 - 44	45,902	13	548,352	12
45 - 49	35,964	10	507,549	11
50 - 54	24,541	7	405,451	9
55 - 59	14,941	4	295,937	7

60 - 64	8,293	2	196,176	4
65 - 69	2,370	1	73,115	2
70 - 74	863	0	29,485	1
Total	356,706	100	4,500,481	100

Table 2 shows that the age profile of the City of London's workforce differs notably from that of Greater London. Employees aged 25 to 34 make up 39% of the City's workforce, compared to 31% in Greater London. Similarly, those in the 35 to 49 age brackets represent 39% of workers in the City, whereas they account for only 36% across Greater London. In contrast, individuals aged 50 and over constitute a smaller proportion of the City workforce (14%) than in Greater London (23%), indicating a lower presence of older professionals. Census 2021 data further highlight a younger workforce in the City, with 61% of workers aged between 22 and 39, compared to 40% for England and Wales as a whole.

Research by Transport for London (2019) has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over, with 87% walking at least once a week, and 65% travelling by bus at least once a week. 51% of weekday journeys made by Londoners aged 65 and over are for shopping/personal business, while 30% are for leisure purposes. Walking is the most used mode of transport by younger Londoners, with 97% aged 24 and under walking at least once a week.

It is also important to acknowledge the intersectionality between age and disability. For example, Age UK fact and figures (2025) shows that 52% of those aged 65 and over are disabled compared with only 9% under 64.

Disability

The City of London is a unique area with a small residential population but a significant daily influx of workers, students and visitors, making it difficult to fully represent the number of disabled individuals who regularly work, study and visit the City.

The 2021 Census (Office of National Statistics, 2023) found that London 15.7%, or 1.2 million people are disabled. It also identified that City of London had one of the lowest proportions of disabled residents (11.8%) compared to other local authorities in London:

- 3.9% had a disability that limited their day-to-day activities a lot
- 7.9% had a disability that limited their day-to-day activities a little

Specific data on the number of disabled individuals working in the City of London is not readily available with exception to some limited information the City Corporation hold on City workers holding Red Badges.

- As of 1 November 2024, there were 167 Red Badges issued, with 72 held by City residents and 95 by permanent City workers.
- According to the latest data, approximately 678,000 people work in the City of London (City Corporation, 2023). It is estimated that 0.01% of City workers hold a Red Badge.
- There may also be disabled drivers with designated parking spaces at their City workplace who do not hold a Red Badge.

Specific data on the number of disabled individuals currently studying in the City of London is not readily available. However, the City of London is home to several higher education institutions and schools. Including:

- Gresham College, which offers free public lectures within the City of London.
- Guildhall School of Music and Drama, which is renowned for its performing arts programs.
- BPP University, which specializes in law, business, finance, and health.
- Coventry University campus on Middlesex St
- London Metropolitan University, Aldgate Campus, which offers a wide range of undergraduate and postgraduate courses.

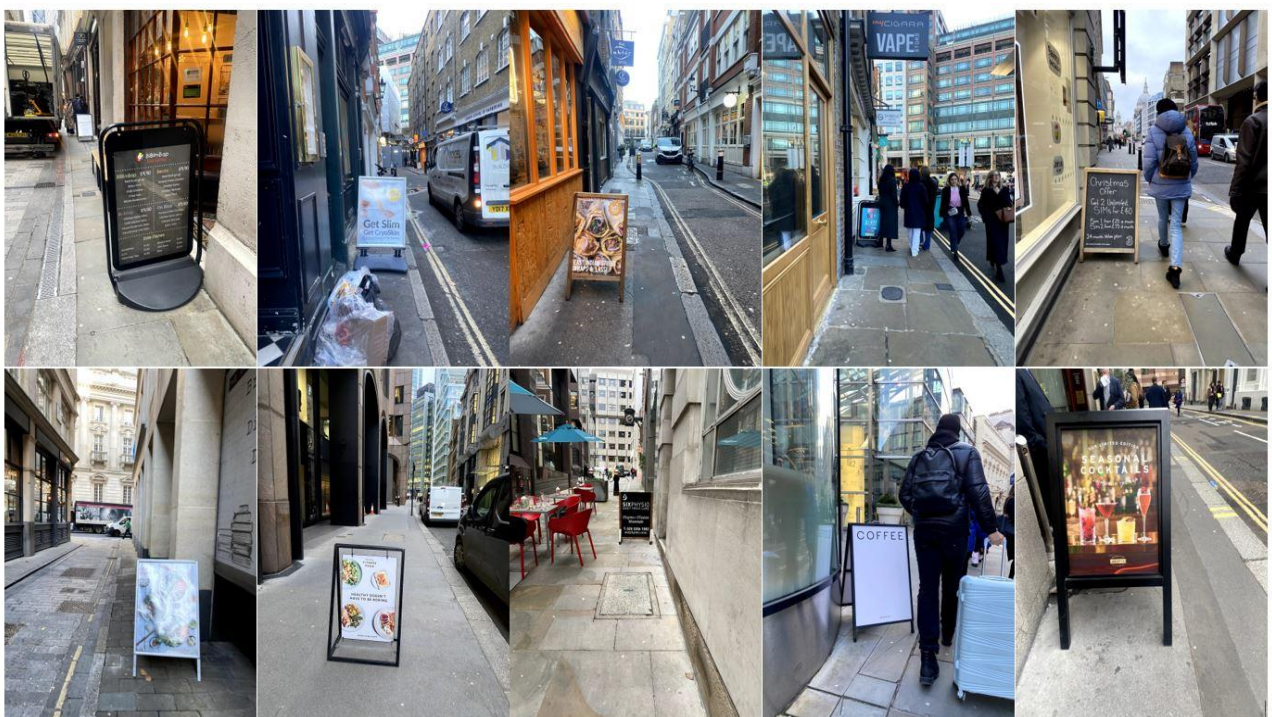
The Department for Work and Pensions (2023) identified that there has been strong growth in the number and rate of disabled people in employment, and a narrowing of the gap between the rate of disabled and non-disabled people in employment (the disability employment gap). However, the disability employment gap is wider for:

- disabled men
- older (aged 50 to 64) disabled people
- disabled people with no qualifications
- disabled people of White ethnicity

2024/2025 City Corporation Study on A-Board distribution and use

To assess the distribution and purpose of A-boards across the City, data collection was conducted using a Field Maps App. Using a specifically designed Geographical Information System base layer of business's locations created by the City Corporation GIS team.

For this study, an A-board was identified as a simple stand-alone board with a heavy base or two boards creating an 'A' shape, placed on the pavement to attract attention (*Figure 1*). While a stand or similar, was any object that could cause obstruction outside



of a premises that was being used to advertise for example: menu stands, flags, delivery carts with branding etc.

Data Collection was undertaken during working hours (8 – 6pm), from the 5 December to the 20 January 2025. No data was collected from over the Christmas period between 21 December - 7 January 2025. Officers recorded:

- which organisations/locations had an A-board, or stand, or both, to advertise and promote their business.
- the number of each A-board or stand,
- their primary use (wayfinding, advertising, or both) and location (private land, public highway or unsure).

A summary of the A-board Baseline Study is provided below; see Appendix 2 for the full study.

Figure 1: Distinct types of A-boards recorded as part of this project

A-boards or stand obstructions were found at 830 of the 1,994 locations (42%).

A-boards dominated the street environment with 805 locations recorded as displaying at least one A-boards, 79 displaying at least one stand or similar, and 54 displaying both (Figure 2).

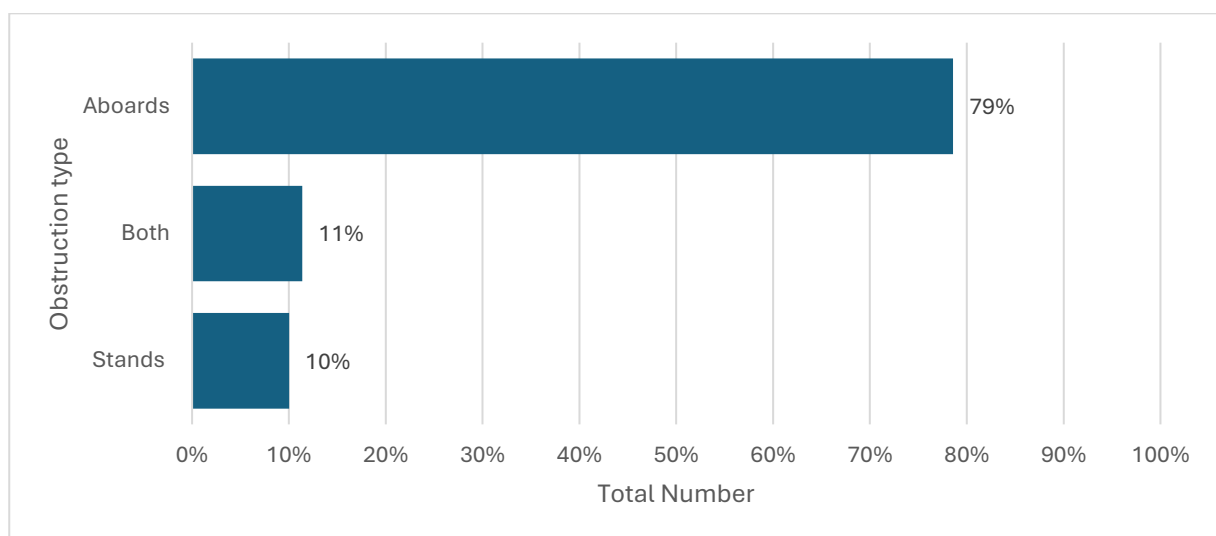


Figure 2: Percentage distribution of total numbers of A-board, Stands or both

Out of 805 locations with A-boards, there were a total of 973 boards, with an average of 1.2 per location. Specifically,

- 666 locations had 1 A-board,
- 116 had 2 A-boards,
- 18 had 3 A-boards,
- 4 had 4 A-boards,
- 1 location displayed 5 A-boards.

Of the 79 locations there were a total of 124 stands or similar.

A-boards are primarily used for advertising, with 772 boards (93%) serving this purpose. A small percentage (0.7%) are used for wayfinding; these were usually businesses in alleyways. About 5.7% serve both advertising and wayfinding roles, and 0.6% fall under other uses, such as buckets full of flowers, or postcard stands for sale outside or delivery trollies without branding.

Table 3: Distribution of A-boards by purpose

Category	Number of Boards	Percentage
Advertising	772	93%
Wayfinding	6	0.7%
Both advertising and wayfinding	47	5.7%
Other	5	0.6%

A-boards placement was photographed, and often A-boards were positioned in ways that cause safety concerns or reduced the available space on footways, which could lead to obstructions and people walking stepping onto the street.

Officers observed that some businesses were displaying A-boards or stands within their premises, rather than placing them outside, thus keeping the pavements accessible. These businesses were not recorded as having A-boards. Instead, officers photographed these as examples of best practices (Figure 3).



Figure 3: Examples of best practice seen at locations across the City

The data on the type of land usage reveals that a significant majority of A-boards are on the public highway (*Table 4*).

Table 4: Distribution of A-boards by land type

Type of Land	Number	Percentage
Public highway	621	75%
Private land	153	18%
Uncertain	56	7%

In terms of distribution A-boards and stand obstructions were spread out across the City of London, present in every Ward (*Figure 4* and *Figure 5*).

A-Boards were also recorded along streets such as Bishopsgate, Farringdon Street, and New Bridge Street, which are part of the TfL Road Network (TLRN) and are subject to regular enforcement.

These findings highlight both the widespread presence and diverse distribution of A-boards and stand obstructions throughout the City of London, underscoring the importance of consistent monitoring and effective policy enforcement across all wards.

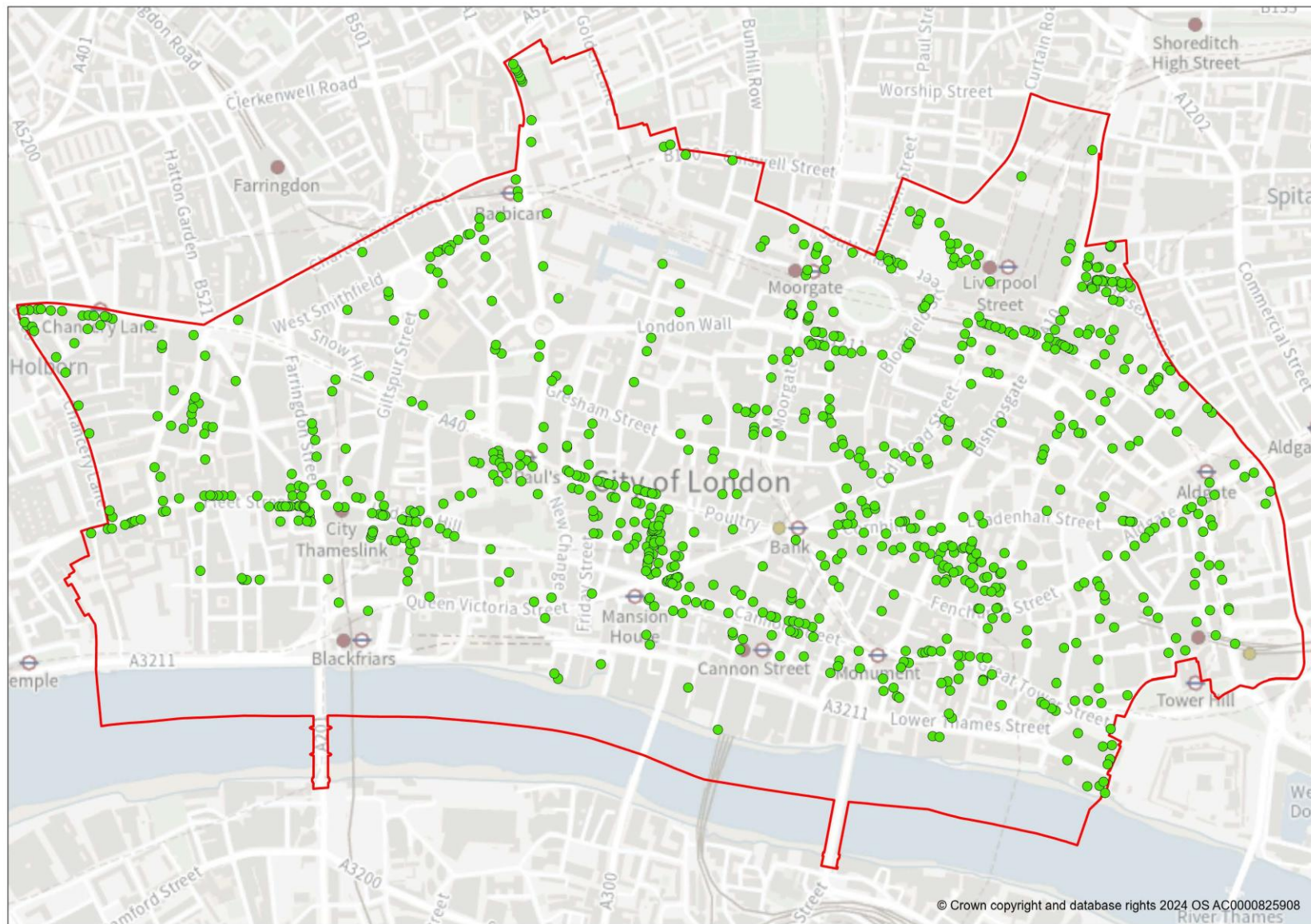


Figure 4: Distribution of A-board and stand locations across the City of London (please note this map was created using all the entered location points, prior to data cleaning so there may be slight discrepancies)

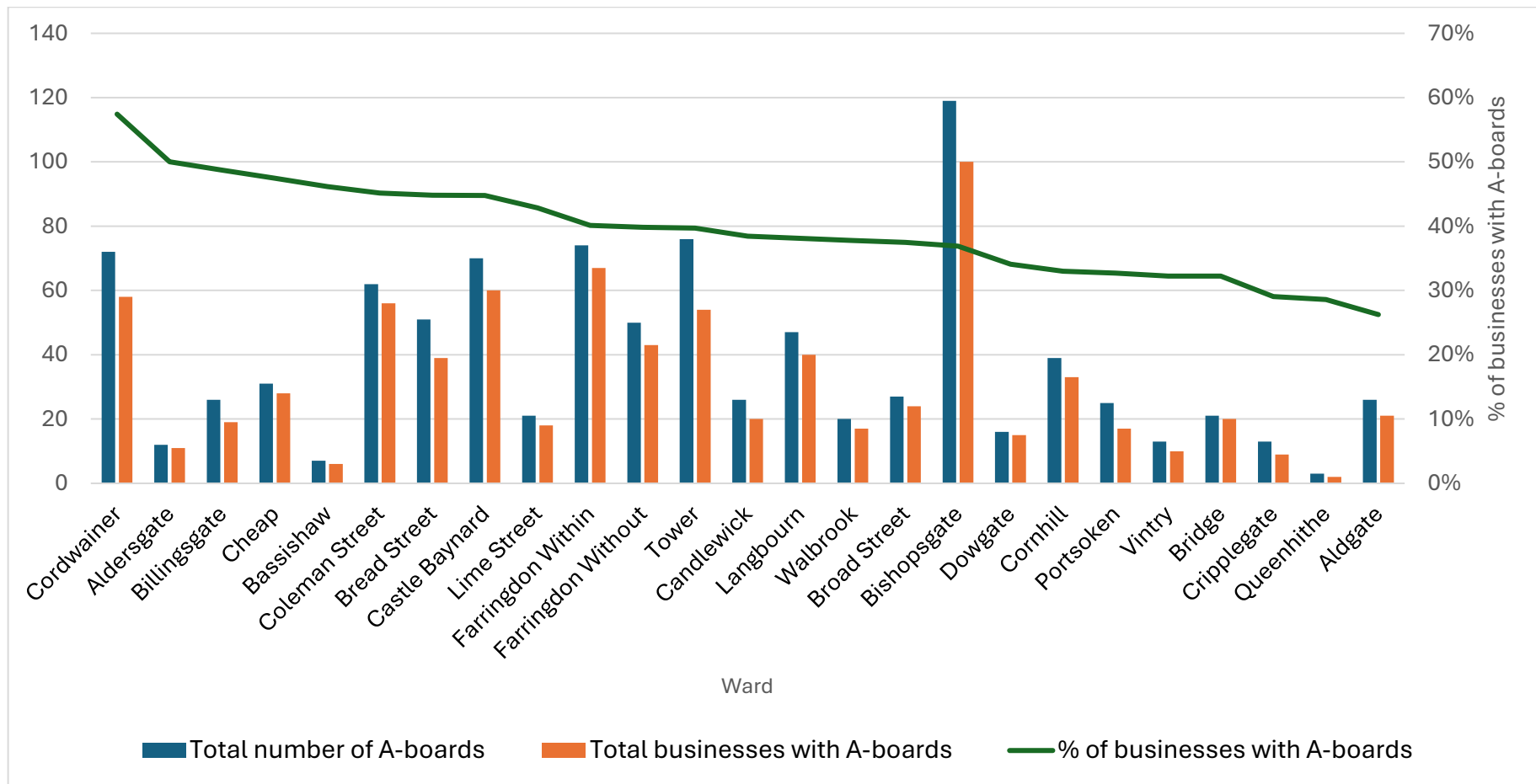


Figure 5: Total number of A-boards by Ward

Proposed changes

Amend the A-board policy to allow A-boards for wayfinding purposes by exception (via a Way-board licence)

Under this option there would still be a City-wide A-board ban but business would be able to apply for a Way-board licence by exception subject to meeting set eligibility criteria.

As less than one percent of signage was identified as exclusively for wayfinding (0.7%) and 5.7% were identified as utilised for both advertising and wayfinding purposes, a licensing system could allow businesses with genuine needs for A-boards to maintain visibility.

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

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

There will be a strict Eligibility Criteria that outlines the necessary licensing conditions for businesses wishing to apply for a Way-board license. A draft Licencing and Eligibility Criteria and Guidance can be found in Appendix 1.

Licences would incur a fee and would require a formal application procedure. Applicants will need to demonstrate that their Way-board is for wayfinding purposes and meets stringent accessibility criteria, as outlined in forthcoming guidance.

Applications and guidance material/documentation will be prepared in accordance with the social model of Disability (Disability Rights UK, 2025). This will ensure that businesses recognise and address the barriers created by society, rather than focusing solely on individuals' impairments. This approach aligns with regulatory expectations around equality, inclusion, and accessibility, helping businesses understand and demonstrate their commitment to fair treatment and compliance. Furthermore, integrating the social model improves business understanding by encouraging inclusive policies and practices, fostering a more diverse workforce, and enhancing customer experience for everyone.

Each application will be reviewed, and licences will be granted to successful applicants.

Enforcement will focus on verifying whether a valid licence is present for any Way-board displayed.

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The proposed licensing scheme is intended strictly for exceptional circumstances only, and all businesses must adhere to the established guidelines.

Positive

- Small and medium-sized businesses would benefit from increased visibility and the ability to use their A-boards. This supports equity in business competition. For many small and medium enterprises (SMEs), street-level advertising such as A-boards could be a tool for attracting foot traffic and communicating daily specials, services, or promotions. In areas with high pedestrian flows, like the City of London, A-boards can help these businesses remain visible amidst larger competitors who might have more extensive branding resources. Allowing continued use of A-boards for wayfinding — subject to regulation—could help level the playing field, ensuring that independent businesses have opportunities comparable to larger chains.
- Enhanced wayfinding signage, such as clearly marked A-boards, can be particularly beneficial for older residents and visitors, as these signs make it easier to locate amenities and services in busy urban environments (Age UK, 2018).

Negative

- Older people, particularly among people over 65, are more vulnerable to slips, trips, and falls (Public Health England, 2019). As such, A-boards can be a risk and need regulations and careful placement—possibly including guidelines from the Royal National Institute of Blind People (RNIB, 2021) are crucial to balance the needs of accessibility and businesses visibility, ensuring public spaces remain safe for all users.
- Beyond the risks of slips, trips, and falls, A-boards can contribute to additional public realm challenges. Street clutter can obstruct the free flow of pedestrians, particularly impacting those using wheelchairs, mobility scooters, or pushing prams.
- Narrow pavements can become congested, making it difficult for people with visual impairments or limited mobility to navigate safely. There is also a risk that, without consistent enforcement, some businesses may place boards in unsuitable locations or allow them to encroach upon pedestrian routes, exacerbating accessibility concerns and causing people to step into the street, putting them at risk of collisions.
- Maintenance of A-boards can be inconsistent and poorly-maintained or weather-damaged boards could become hazards, increase the likelihood of incidents or creating unsightly streetscapes. This is of particular concern for way-boards, which will by their nature likely be out of the line of sight of the businesses responsible for them. If they fall, become damaged or otherwise create a hazard, this may not be immediately visible to the business responsible.

Outcome

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A comprehensive assessment of the advantages and disadvantages indicates that implementing a regulated licensing system for Way-boards represents a pragmatic solution. Establishing explicit criteria and ensuring robust enforcement can facilitate greater visibility and fair competition for small and medium-sized businesses, without unduly impacting individuals who walk, wheel or use mobility aids.

Transport for All (2015) notes: *“Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users, and older people too. Transport for All welcomes this ‘zero-tolerance’ approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle.”*

Upholding stringent eligibility requirements and guidance—through careful placement and high maintenance standards—serves to reduce associated safety risks. In conclusion, the adoption of a licensing scheme with transparent fees and criteria provides a structured framework that supports business growth and urban vitality while prioritising accessibility and safety for all members of the community.

Proposed licencing structure and fee for “Wayboards”

It is proposed that applications for Way-board licences be assessed strictly in accordance with established eligibility criteria and have a licencing fee.

Should an application fail to meet these criteria, approval will not be granted. However, it is recommended that applicants retain the right to appeal any decision where their application has been refused, ensuring transparency and fairness throughout the process.

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.

It is anticipated that our proposed fee structure will be modelled on Barnet Council’s approach. For reference, Barnet’s 2025 model sets the total cost at £245, consisting of a non-refundable £72 application fee (payable upfront) and a further £173 licence fee, which is paid upon approval prior to the licence being issued. The licence remains valid for one year (London Borough of Barnet, 2025).

Proposed Way-board Licence

- Total Cost: £240
- Application Fee: £70 (non-refundable, paid upfront)
- Licence Fee: £170 (paid after approval, before licence is issued)
- Licence validity: 2 years
- Licence Fees subject to review every four years

Positive

- In setting low costs, the structure is designed to cover administrative expenses while remaining accessible for businesses, particularly SMEs. By

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keeping costs manageable and clear, the scheme promotes equal opportunity, making participation in the Way-board licensing system fair and inclusive for all applicants regardless of background.

- Accessibility considerations—such as providing information in alternative formats or offering additional support during the application process—further strengthen compliance with the Equality Act and help create an environment where all eligible businesses can participate on equal footing.

Negatives

- A potential downside is that low fees may unintentionally lead to an increase in street clutter or obstructions if not managed carefully.

Outcome

On balance, the current proposed fee structure creates a positive framework that encourages participation while responsibly managing administrative costs. However, careful oversight is necessary to prevent unintended negative consequences. By maintaining transparency in costs, ensuring ongoing accessibility support, and periodically reviewing the fee levels, the scheme can continue to promote fairness and inclusivity. With these safeguards in place, the licensing system will be well-positioned to meet the needs of diverse business applicants and uphold equal opportunity.

Exceptional Circumstances policy

Current procedures did not have any specific mention of exceptional circumstances. Having a procedure will ensure that these are dealt with fairness and consistency, and the City Corporation can offer necessary support to vulnerable individuals facing significant challenges either through a Red Badge or by way of short-term parking exemption. For example, to include people undergoing life-changing medical treatments in the City of London

Positives

- This change would align with the requirements of the Equality Act 2010, to making reasonable adjustments for individuals with protected characteristics and will provide a framework to support individuals who might be disproportionately affected by exceptional circumstances, that standard rules might not cover. It will define a criterion and how businesses can qualify to ensure these applications will be reviewed with fairness and compassion and we can offer necessary support to vulnerable individuals facing significant challenges
- It ensures that all individuals are treated fairly and consistently. This helps prevent discrimination and ensures that everyone has equal opportunities, regardless of their circumstances.
- By addressing exceptional circumstances, the City Corporation demonstrates empathy. Flexibility can enhance our reputation and build trust with our stakeholders

Negative impacts

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- There is a risk that some individuals might exploit these policies, claiming exceptional circumstances without genuine need. This could negatively affect parking for disabled people.
- Managing and accessing exceptional circumstances could increase the administrative workload for the Contact Centre, however, this would likely not impact any of the protected characteristics at this time.

Outcome

By including provisions for exceptional circumstances, we ensure that our policies are inclusive and that all individuals are treated fairly and consistently. This flexibility can lead to greater public trust and aligns with the Corporate Plan's focus on creating a supportive and adaptable environment. However, it is essential to establish a strong verification process to prevent misuse and ensure that the support reaches those who genuinely need it.

This will include ensuring individuals with long term illnesses and severe mobility issues are considered. For example, if someone has a condition that severely limits their ability to walk that is expected to last for a significant period and can justify that a red badge will give them independence, in cases such as these they might be eligible.

Licence validity and renewals

Generally, licences are valid for 1 year (pavement licences). We are proposing renewal period to two years (applicants will need to provide evidence to support their renewals). The change aims to empower small businesses by providing them with a longer period of validity for their Wayboard Licence, thereby reducing the stress and effort associated with frequent renewals.

Positives:

- Longer validity periods renewals period can reduce administrative and financial barriers for SME's

Negative

- There is a risk that some individuals might exploit these policies, this could exacerbate the negative impacts of A-boards.

Outcome

On balance a two-year validity is expected to have a positive effect for SMEs by reducing administrative and financial hurdles, thus supporting local businesses. However, to address concerns regarding potential misuse—such as increased street clutter or obstruction—a robust eligibility criteria is required.

The adoption of strict eligibility criteria, evidence requirements, and targeted guidance will help mitigate negative impacts, particularly for disabled people, older adults, and families with prams. Through these measures, the policy aims to strike an equitable balance between supporting economic activity and safeguarding accessibility and inclusivity in public spaces.

3. STAKEHOLDER ENGAGEMENT

To date, engagement has primarily been office-based, involving internal discussions with licensing, highways, and enforcement officers, as well as external engagement with officers from other London boroughs. In addition, previous engagement and feedback gathered during earlier committee meetings and detailed within background papers relating to A-boards have also been considered as part of this process. This ensures that the current approach is informed by a broad spectrum of insights and lessons learned from prior consultations and deliberations on similar matters.

Businesses and disability groups have not been directly consulted about the proposed change. If members support this option at the October Planning and Transportation Committee, further consultation with these stakeholders will follow, and the EQIA will be updated after broader engagement.

4. DECISION MAKING (MITIGATIONS AND CHANGE)

It is recommended that the following actions are taken to avoid or mitigate any negative impact and to better advance equality and foster good relations.

Strict eligibility criteria and guidance

The introduction of strict eligibility criteria for Way-board licensing is a key mechanism for mitigating potential negative impacts on accessibility and safety. By limiting eligibility to businesses located in alleyways, courtyards, or other locations without direct street frontage or alternative signage options, the policy ensures that only those with a demonstrable need can apply.

This targeted approach prevents widespread proliferation of Way-boards, thereby reducing the risk of street clutter and obstructions that could disadvantage disabled people, older adults, and parents with prams.

The requirement for applicants to provide evidence—such as photographs showing limited visibility—further supports objective decision-making and reinforces the City Corporation's commitment to maintaining inclusive and navigable public spaces.

Engagement

Engaging with stakeholders is crucial as it ensures that the voices and experiences of those directly affected are heard and considered in the policy development process. It is important to involve people with a range of protected characteristics and lived experience in this proposed change to introduce Way-boards.

To further support inclusivity and responsiveness, establishing a dedicated feedback line for reporting obstructions or concerns relating to accessibility is essential. This direct channel would allow users, particularly those with lived experience of disability, to promptly highlight any barriers encountered in public spaces or with the new Way-board system. Enforcement officers will monitor compliance and respond to public reports.

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Such a mechanism not only ensures ongoing dialogue but also enables timely action to address issues as they arise, thereby reinforcing the City Corporation's commitment to accessible environment for all.

EQIAs will be required from applicants as part of the licensing process

As part of the Way-board licensing application process, all applicants will be required to complete an Equality Impact Assessment (EQIA). This ensures that businesses proactively assess how their proposed Way-board placement may affect people with protected characteristics, including disabled individuals, older adults, and parents with prams.

Applicants must identify potential risks, for example, obstructions to walking and wheeling paths or proximity to tactile paving and propose mitigation measures, such as maintaining a minimum 2m clear footway and using high-contrast, cane-detectable way board signage.

These EQIAs will be reviewed by City Corporation officers to verify accuracy and feasibility, helping to ensure that licensed Way-boards do not compromise accessibility or safety. This process will support our Public Sector Equality Duty, while reinforcing the City Corporation's commitment to inclusive public spaces.

5. MONITORING AND REVIEW

Monitoring will help ensure the impacts identified have been successfully mitigated and will aim to maximise the potential positive impacts identified for businesses, especially SMEs.

It is recommended that lines of communication are maintained on the website so that different user groups can provide feedback where appropriate.

6. RECORDING YOUR DECISION AND SIGN-OFF

The proposed changes to implement a Way-board licencing system are anticipated to positively impact businesses in alleyways and passages, who don't have visibility and business from passersby. These are usually small or medium sized businesses in the City.

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

Several potential negative impacts have been identified in relation to A-boards causing obstruction and their potential impact on disabled people, elderly people and people who are currently pregnant or have small children. Although these can be mitigated via the licensing system. However, fallen or poorly placed A-boards may impede access and obstruct street-level sightlines, affecting not only people using wheelchairs or children who navigate the environment from a lower eye level, but everyone who uses public spaces. Such obstructions can hinder the ability of all members of the public to anticipate hazards, locate crossings, or respond quickly in

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emergency situations. The Department for Transport's Inclusive Mobility guidance reinforces this by stating that clear, unobstructed sightlines are essential for safe navigation for all (Department for Transport, 2021). Therefore, it is important to consider the risks that displaced, or poorly positioned A-boards pose not only to accessibility for groups but to the overall safety and security of public spaces for everyone. As way-boards are likely to be out of the line of sight of the businesses responsible for them, it may be difficult for a business with a way-board license to monitor whether the way-board is causing an obstruction or creating a hazard.

There are also several risks to consider

Risk	Impact	Mitigation
Reputational	It could be seen as a departure from the previously established policy of a complete A-board ban—a policy which has been strongly supported by accessibility and disability advocacy groups and was implemented to champion the principles of the Equality Act.	Clear communication that Way-boards are for exceptional cases only
Legal	Appeals or challenges if licensing guidance is not very specific or policies are perceived as inconsistent.	Transparent criteria and independent appeals process

Officers recommend that this EQIA be updated again following consultation and monitoring.

This EQIA will be updated if this option is chosen and officer move forward with consultation.


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Sign off

1. Officer completing the EQIA

Name	Andrea Larice
Job Title	Behaviour Change and Campaigns Officer
Date	29.09.2025
Signature	<i>Andrea Larice</i>

2. Senior Manager or Chief Officer

Name	Ian Hughes
Job Title	Director of City Operations
Date	29/09/2025
Signature	

Appendices

Appendix 1	City of London Corporation A-board Baseline February 2025 (Separate Attachment)
Appendix 2	DRAFT: Way Finding Way-board Licensing Eligibility Criteria and Guidance (Under Development) September 2025 (Attachment below)

Background Papers

City Corporation (June 2014). Advertising (“A”) Boards in the City of London. Planning and Transportation Committee Report:
<https://democracy.cityoflondon.gov.uk/documents/s35291/Advertising%20A%20Boards%20in%20the%20City%20of%20London.pdf>

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<https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000001/>
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<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021>
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Appendix 1 City of London Corporation A-board Baseline February 2025 (Separate Attachment)

Appendix 2: DRAFT: Way Finding Way-board Licensing Eligibility Criteria and Guidance (Under Development) September 2025

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.

Please refer to the EQIA guidance when completing this form

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 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 wayfinding 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.

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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 items 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.

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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 2m 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.

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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 of London.

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:

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- 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.