

Appendix 1

Articles on the Highway Policy Consultation Outcomes

Consultation period: 29 June to 27 July 2026

This appendix summarises the consultation findings that informed the final Articles on the Highway Policy presented to Cabinet for approval.

At a glance

212 completed responses. The findings show broad support for clearer safety and accessibility requirements, alongside concerns about business impact, licensing, fees, enforcement and proportionality.

1. Consultation overview

The consultation sought views on how advertising boards, shopfront displays, stock and similar items placed on the highway outside premises should be managed. The consultation was open to residents, businesses, organisations, elected representatives and other interested parties.

Respondent type	Completed responses
Members of the public	182
Medway business representatives	20
Organisations	6
Elected representatives	2
Other respondents who identified as Medway residents	2
Total	212

The consultation was self-selecting. The findings reflect the views of those who responded and should not be treated as statistically representative of all Medway residents or businesses.

2. Headline findings

The findings show broad support for Council management of pavements and for the main rules proposed in the draft policy:

Measure	Support	What this indicates
Council management of pavements	175 important or very important	Strong support for maintaining safe and clear routes.
Clearer guidance and rules	151 agree or strongly agree	Support for clearer expectations for businesses.

Minimum 1.5m clear space	185 agree or strongly agree	Retain the minimum standard, with guidance for constrained locations.
Stable, secure and safe items	190 agree or strongly agree	Retain clear safety and maintenance conditions.
Items kept within a defined area	185 agree or strongly agree	Support agreed areas linked to business frontages.
Access points kept clear	201 agree or strongly agree	Strongest support across the proposed rules.
Limits on number or size where needed	157 agree or strongly agree	Overall support, but more mixed views from businesses.

3. Main consultation themes

Accessibility and clear routes: Respondents highlighted wheelchair and pushchair access, visual and mobility impairments, specialist buggies, predictable routes and the risk of people being forced into the road. Medway Parents and Carers Forum strongly supported clear and accessible pedestrian routes.

Business impact and high street vitality: Some respondents felt responsible displays help businesses, attract customers and add character to high streets. Concerns were raised that a blanket approach could disadvantage responsible businesses.

Licensing, fees and bureaucracy: Some respondents supported visible permission, while others questioned whether licensing was necessary or viewed fees as an additional burden or income-generating measure.

Enforcement and proportionality: Respondents wanted enforcement to be clear, consistent and proportionate, with advice and an opportunity to correct minor issues before formal action unless there is an immediate safety risk.

Historic and constrained locations: Questions were raised about how the 1.5-metre standard would work in narrow or historic high streets. Respondents supported site-specific assessment rather than automatic approval or refusal.

Wider pavement issues: Comments also referred to pavement parking, uneven surfaces, e-scooters, vegetation, bins, litter and street cleanliness. These issues are largely outside this policy and should be referred to relevant services where appropriate.

4. Business and stakeholder insight

Twenty Medway business representatives responded. This is a small sample, so the findings provide useful insight but should not be treated as representative of all Medway businesses.

- A-boards were the most common item placed outside, reported by 12 business respondents.
- Thirteen business respondents said following clear rules would be very easy or fairly easy; three said it would be fairly difficult or very difficult.
- The most selected form of practical support was a clearly defined area agreed with the Council, without pavement markings, selected by eight businesses.
- Business respondents generally supported the core safety rules but were more mixed about licensing and limits on the number or size of items.

Organisation responses added accessibility, charity, community and place-based perspectives. Accessibility-focused organisations strongly supported clear routes, while Intra Community Trust and The Vines Church raised concerns about licensing, cost, bureaucracy and the effect on businesses in Rochester and Intra.

5. Consultation outcome and policy response

Consultation outcome

The consultation broadly supports the policy's core safety and accessibility requirements. The findings have informed the final policy and should also inform the supporting guidance, implementation and communications.

The consultation supports retaining the core safety and accessibility requirements. In responding to the findings, the final policy, supporting guidance and implementation arrangements should:

- explain clearly why the policy and licensing process are needed, and confirm that their purpose is safety, accessibility and consistent highway management
- clarify what is covered by the policy and how it differs from the separate Pavement Licensing Policy
- explain how the minimum 1.5-metre clear route will be measured and assessed in narrow, historic or constrained locations
- use plain English and practical diagrams showing suitable and unsuitable placement
- explain what licence fees cover and how businesses will show that permission has been granted
- apply limits on the number, size or type of items only where justified by the location and identified risks
- use a fair, staged and proportionate enforcement approach, while allowing immediate action where an item creates a serious safety or accessibility risk

6. Evidence record

A detailed consultation evaluation is held by the Highways service. It contains the full question-by-question analysis, respondent breakdowns, free-text themes, equality and stakeholder insight, marketing and engagement evaluation, and policy considerations arising from the consultation.

Articles on the Highways Consultation Evaluation



1. Summary

The consultation ran from **29 June 2026 to 27 July 2026** and received **212 completed responses**. Respondents included members of the public, Medway business representatives, organisations, elected representatives and others.

The consultation's main objective was to gather views on how items placed on the highway outside premises should be managed, including advertising boards, shopfront displays, stock and similar items.

The results show broad support for clearer rules to help keep pavements safe and accessible. However, responses also raised concerns about business impact, licensing, enforcement, costs and whether the approach would be proportionate.

A number of responses also raised wider pavement issues, including pavement parking, uneven pavements, e-scooters, vegetation, bins and street cleanliness. These are mostly outside the direct scope of the Articles on the Highway Policy but should be noted and shared with relevant teams where appropriate.

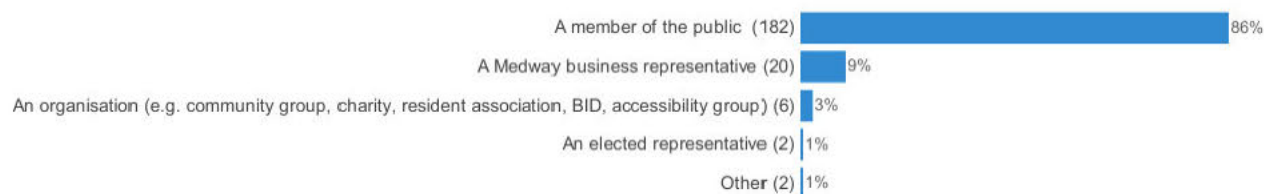
The consultation findings should be used to review the draft policy before Cabinet on **22 September 2026**, particularly around guidance for businesses, proportionality, enforcement, accessibility and how the purpose of the policy is explained.

2. Respondent profile and analysis approach

For this evaluation, responses have been broken down further by respondent type because the consultation is likely to affect different groups in different ways.

The findings should be treated with the consideration of those who responded, rather than as statistically collectively.

Which of the following best describes you? (Please select one option only)



***For the purpose of this evaluation, the two "Other" responses have been included within the "A member of the public" group, based on their answers:**

- "Medway Council employee and resident of Medway"
- "Resident in Medway"

3. Question by Question findings

Each question will have the evaluating officers interpretation and policy consideration

Please note: "Other participants" includes public/residents, organisations and elected representatives.

3.1 How often respondents see business items on pavements

Question:

"How often do you see business items such as advertising boards, displays, stock or furniture placed outside a business on pavements?"

Response	Total respondents	Businesses	Other participants
Frequently	144	16	128
Occasionally	55	3	52
Rarely	13	1	12
Never	0	0	0

Officer Interpretation

Most respondents said they see business items on pavements frequently. This was also the case for business respondents, with 16 out of 20 businesses selecting "Frequently". This suggests that items placed outside businesses are common and visible across Medway.

Policy consideration

The frequency of responses supports the need for a clear and consistent approach to managing items placed on the highway outside premises.

3.2 Experiences caused by business items on pavements

Question:

Have you or someone you know experienced any of the following due to business items such as advertising boards, displays, stock or furniture placed outside a business on pavements?

(This was a **select all that apply** question, so totals add up to more than 212.)

Issue selected	Businesses	Other participants	Organisations	Total
Not enough space for wheelchairs or pushchairs	3	87	3	90
Streets feeling cluttered or untidy	2	83	3	85
Difficulty walking past	1	78	4	79
None of these	14	65	2	79
Having to step into the road	2	71	4	73
Difficulty seeing or moving around safely	1	36	2	37
Items blocking access, e.g. crossings, entrances or bus stops	0	37	2	37
Items being unstable or at risk of falling	1	30	3	31
Other	0	2	0	2

Officer interpretation

Respondents reported access and safety issues, especially around wheelchair and pushchair access, cluttered streets, difficulty walking past items, and having to step into the road.

Business responses differed from other respondents, with **14 out of 20 businesses** selecting “None of these”, while residents and organisations reported more access-related issues.

Policy consideration

The policy should retain clear accessibility requirements and explain why clear pedestrian routes are needed.

Guidance should help businesses understand how items can affect wheelchair users, pushchairs and people with visual or mobility impairments, and how to avoid creating obstructions.

3.3 Importance of the Council managing pavements

Question: *How important is it to you that the Council manages pavements to ensure there is a safe and clear path for the public?*

Response	Businesses	Other participants	Organisations	Total
Very important	6	125	2	133
Important	8	32	2	42
Neither important nor unimportant	2	9	1	12
Unimportant	3	10	1	14
Very unimportant	1	9	0	10
No answer	0	1	0	1

Officer interpretation

Most respondents said it was very important and important for the Council to manage pavements to keep a safe and clear path. Business respondents were more mixed, but most still selected important or very important.

Policy consideration

This supports retaining a policy approach focused on clear, safe and accessible pavements.

3.4 Views on clearer guidance and rules

Question: *To what extent do you agree or disagree that clearer guidance and rules for how items are placed outside businesses would help keep pavements safe and accessible?*

Response	Businesses	Other participants	Organisations	Total
Strongly agree	4	90	2	96
Agree	5	48	2	55
Neither agree nor disagree	5	20	2	27
Disagree	2	14	0	16
Strongly disagree	3	10	0	13
Don't know	1	0	0	1
No answer	0	4	0	4

Officer interpretation

Most respondents agreed that clearer guidance and rules would help keep pavements safe and accessible. Business responses were more mixed and less agreeable than other participants.

Policy consideration

The policy should be supported by clear, plain English guidance for businesses, including examples of safe placement and what is expected.

3.5 Views on proposed policy rules

Summary

Overall, the proposed policy rules received broad support, particularly around keeping items stable, maintaining clear space, and not blocking key access points. Business responses were generally supportive of the core safety rules, but were more mixed around limiting the number or size of items. This suggests that the policy should retain the core safety and accessibility requirements, while guidance should explain how rules will be applied fairly and proportionately.

Break down of the questions:

Question: *To what extent do you agree or disagree with the following rules within the proposed Articles on the Highway Policy?*

3.5.1 Keeping enough space for people to pass safely, minimum 1.5m clear space

Response	Businesses	Other participants	Organisations	Total
Strongly agree	7	113	3	123
Agree	10	51	1	62
Neither agree nor disagree	0	10	2	12
Disagree	3	7	0	10
Strongly disagree	0	4	0	4
No answer	0	1	0	1

Officer interpretation

There was strong support for the main safety and accessibility rules. The strongest support was for **not blocking access points**, such as crossings, entrances and bus stops. Business responses were most mixed around **limiting the number or size of items where needed**.

Policy consideration

The policy should retain the core safety and accessibility requirements. Guidance may need to explain how limits on number, size and placement will be applied fairly and proportionately.

3.5.2 Making sure items are stable, secure and not a hazard

Response	Businesses	Other participants	Organisations	Total
Strongly agree	7	116	3	126
Agree	10	52	2	64
Neither agree nor disagree	1	10	1	12
Disagree	2	4	0	6
Strongly disagree	0	3	0	3

No answer	0	1	0	1
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3.5.3 Keeping items within a defined area directly outside the business

Response	Businesses	Other participants	Organisations	Total
Strongly agree	5	99	3	107
Agree	13	63	2	78
Neither agree nor disagree	0	15	1	16
Disagree	2	6	0	8
Strongly disagree	0	1	0	1
No answer	0	2	0	2

Officer interpretation

Most respondents supported items being kept within a defined area directly outside the business. Business responses were also mostly supportive, with 18 out of 20 businesses selecting agree or strongly agree.

Policy consideration

The policy should retain the requirement for items to stay within an agreed area, but guidance should explain how this will work for different business frontages and street layouts.

3.5.4 Not blocking access points such as crossings, entrances or bus stops

Response	Businesses	Other participants	Organisations	Total
Strongly agree	9	130	3	142
Agree	10	47	2	59
Neither agree nor disagree	0	7	1	8
Disagree	1	1	0	2
Strongly disagree	0	1	0	1

Officer interpretation

This rule had very strong support across all respondent groups. Almost all business respondents also supported not blocking access points.

Policy consideration

The policy should retain clear wording that items must not block crossings, entrances, bus stops, dropped kerbs, tactile paving or other key access points.

3.5.5 Limiting the number or size of items where needed

Response	Businesses	Other participants	Organisations	Total
Strongly agree	4	97	2	103
Agree	6	45	3	54

Neither agree nor disagree	4	23	1	28
Disagree	4	13	0	17
Strongly disagree	1	7	0	8
No answer	1	1	0	2

Officer interpretation

There was still overall support for limiting the number or size of items where needed, but business responses were more mixed for this rule than for the other proposed rules.

Policy consideration

The policy should explain when limits on number or size may be needed, and how decisions will be made fairly and proportionately. This may be particularly important for businesses with different types of displays or constrained frontages.

4. Free text themes

Summary

Free-text responses support the need for clearer management of pavement items, particularly to improve accessibility and safety. However, they also highlight concerns around business impact, licensing, enforcement and wider pavement issues outside the direct scope of the policy.

Theme	What respondents raised	Possible policy consideration
Accessibility and clear routes	Respondents raised wheelchair access, pushchair access, visual impairments, mobility difficulties, people being forced into the road, and the need for predictable clear routes. Medway Parents and Carers Forum gave particularly detailed feedback on the impact of obstructions on disabled people, SEND families and people using mobility aids or specialist buggies.	Keep strong accessibility wording. Ensure the policy clearly explains why clear, predictable pedestrian routes are needed and how the policy supports disabled people, people with pushchairs and people with visual or mobility impairments.
Support for clearer rules	Some respondents supported clearer rules and controls, particularly where items block access, create clutter, or are not safely managed. Some comments specifically welcomed the Council addressing the issue.	Retain the principle of a clear policy, licensing and conditions. Make sure the final policy explains the safety, accessibility and consistency reasons for introducing it.
Business impact and high street vitality	Some respondents were concerned that the policy could make it harder for businesses to trade, advertise, create atmosphere, or attract customers. Several comments said pavement items can make high streets look more vibrant and welcoming when managed responsibly.	Check that the policy tone is balanced and supportive of businesses, not just restrictive. Consider whether guidance can show how businesses can use pavement space responsibly while maintaining access.
Cost, fees and income generation concerns	A number of respondents felt the policy could be seen as another charge, tax, fine or income-generating scheme, especially for small or independent businesses already under pressure.	Clearly explain the purpose of any licence, fee or charge. If fees are already agreed, the Cabinet report and guidance should still explain that the purpose of the policy is safety, accessibility and consistency, not income generation.

Licensing and permission display	Views were mixed on whether businesses should need a licence or visible permission. Some supported visible accountability, while others felt a licence was unnecessary or too bureaucratic. Some suggested a digital record, visible licence, or a code of conduct approach.	Clarify why licensing is needed, what will need permission, how permission will be shown, and whether a visible licence, digital record or combined approach is most appropriate.
Enforcement and proportionality	Respondents asked how the policy would be enforced, whether fines would apply, how enforcement would be resourced, and whether responsible businesses could be penalised because of poor practice by others.	Make the enforcement process clear, fair, staged and proportionate. Guidance should explain that enforcement will focus on obstruction, safety risk and non-compliance rather than taking a blanket approach.
1.5m clear space and constrained locations	Some respondents supported the 1.5m clear space, while others questioned whether it would work in narrow streets, older high streets or locations where the pavement itself is already restricted.	Keep the clear space requirement but consider whether guidance should explain how constrained locations will be assessed and how exceptions or site-specific decisions will be handled.
Practical support for businesses	Businesses and respondents suggested practical help such as agreed areas, clear measurements, diagrams, examples, boundary markings, or a common-sense approach.	Consider simple business guidance, diagrams/examples, agreed areas and, where appropriate, whether markings or other visual aids would help businesses understand where items can safely be placed.

5. Business Only Questions

The following questions were only asked to respondents who identified themselves as “**Medway business representatives.**” There were **20 Medway business representatives** who completed the consultation. This provides useful feedback from businesses that responded, but it **should be treated with caution** as it is a small sample and may not represent the views of the majority of businesses across Medway.

These responses should be considered alongside the wider consultation findings, particularly where business views differ from residents, organisations and other participants.

5.1 Items businesses said they place outside

Question 13: *What types of items does your business place outside on the pavement, if any?*

Item type	Business responses
Advertising boards / A-boards	12
Displays of goods	6
Furniture, such as chairs/tables/benches	5
Planters or decorative items	5
Storage/equipment, such as cages/trolleys	1
None	3

Officer interpretation

A-boards were the most common item business respondents said they place outside, followed by goods displays, furniture and planters or decorative items. This suggests the policy is likely to affect a range of business frontage items, but particularly A-boards.

Policy consideration

The policy and supporting guidance should include clear examples for the most common item types, particularly A-boards, shop displays, furniture and planters. This would help businesses understand what is covered by the policy and what standards apply.

5.2 How easy businesses said it would be to follow clear rules

Question 14: *Thinking about your business, how easy or difficult would it be to follow clear rules about where items can be placed?*

Response	Number of business respondents
Very easy	8
Fairly easy	5
Neither easy nor difficult	2
Fairly difficult	2
Very difficult	1
Not applicable	1
No answer	1

Officer interpretation

A-boards were the most common item business respondents said they place outside.

Policy consideration

The policy and supporting guidance should include clear examples for the most common item types, particularly A-boards, shop displays, furniture and planters. This would help businesses understand what is covered by the policy and what standards apply.

5.3 How businesses said the Council could help them place items safely

Question 15:

How could the Council help your business know where items can be safely placed on the pavement without obstructing pathways?

Response	Number of business respondents
A clearly defined area agreed with the Council, without markings	8
Clear guidance showing measurements and examples	3
Don't know	3
Other*	3
A combination of these	2

Boundary markings on the pavement, e.g. paint or small raised markers	1
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Officer interpretation

The most selected option was “a clearly defined area agreed with the Council, without markings”, chosen by 8 business respondents. This suggests that some businesses would welcome clarity about where items can be placed but may not necessarily want physical markings on the pavement.

Policy consideration

Management may wish to consider whether the final policy and guidance can include agreed areas, clear measurements, diagrams or examples. Being mindful of small sample of business response data pavement markings could be considered where practical, but the responses suggest this may not need to be the default approach.

5.4 Other comments

Three business respondents selected **Other** and provided the following comments:

1. Just Cutts Butchers

“The council don’t need to do this”

Officer Interpretation:

This respondent does not feel Council support or intervention is needed.

Policy consideration:

Make sure the final policy explains clearly **why** the policy is needed, including the Council’s highway safety and accessibility responsibilities.

2. Lux

“It needs a common sense approach people will wilfully not 'understand' or break the rules if they are rogue, shop fronts or bad people. Good people will, so a blanket decision wont work here as you will pupnish the good and not reach the bad.”

Officer Interpretation:

This respondent is concerned that a blanket approach could affect responsible businesses more than businesses already acting poorly.

Policy consideration:

Consider wording in the policy or guidance that explains decisions will be **proportionate, risk-based and site-specific**, rather than a one-size-fits-all approach.

3. Johnstones

“It’s not required as we already know it’s up to a metre”

Officer Interpretation:

This respondent may already be working to an existing understanding of acceptable pavement use, but this may not align with how other businesses operate and the proposed policy requirement.

Policy consideration:

Provide clear guidance explaining the proposed standard, including the **1.5m clear pedestrian route**, so businesses understand what is expected and how this differs from previous practice or informal understanding.

6. Keeping respondents updated

Question 16: *Would you like to be kept up to date on this policy and related Highways updates?*

Response	Businesses	Other participants	Organisations	Total
Yes	15	95	3	113
No	5	90	2	97
No answer	0	1	1	2

Officer interpretation

Most business respondents wanted to be kept updated, with **15 out of 20 businesses** selecting “Yes”. Other participants were more evenly split between wanting updates and not wanting updates.

Policy consideration

With the new Medway Highways and Transport newsletter channel currently in development, this opt-in audience provides a good opportunity to support the new Highways engagement strategy by creating a segmented newsletter audience for respondents who want to receive updates.

A dedicated policy newsletter could then be used to proactively address the common themes, concerns and considerations raised through the consultation, providing clear, factual and reassuring responses and explanations.

Email newsletters can also be shared within other newsletters through links, which provides a valuable opportunity to share this update with wider Medway Council audiences, such as Medway Matters and Medway Business subscribers.

7. Organisation respondent insight

Six responses were received from organisations. These responses are useful because they include community, charity, accessibility, faith, place-based and local event perspectives. They should not be treated as representative of all organisations in Medway, but they provide important stakeholder insight.

Organisation	Background / relevance	What they said in the consultation	Officer interpretation / policy consideration
Medway Parents and Carers Forum	Independent parent-led charity representing families of children and young people aged 0 to 25 with SEND across Medway. They work with local services, including Medway Council, to help shape and improve services. [medwaypcf.org.uk]	Strongly supported the proposals. They selected access issues including difficulty walking past, not enough space for wheelchairs or pushchairs, having to step into the road, difficulty moving safely, unstable items and blocked access. They also strongly agreed with all proposed rules and suggested “a visible licence with items listed that are permitted to be on the pavement”.	This response should carry particular weight for accessibility impacts. The policy should retain strong wording around disabled people, SEND families, wheelchair users, specialist buggies, visual impairments and predictable clear routes.
Shelter Strood	Shelter has a community shop at 52 High Street, Strood. Its shop information notes wheelchair access and a level entrance, making	Reported several access and safety issues, including difficulty walking past, not enough space for wheelchairs or pushchairs, having to	This response supports the need for clear rules that protect access in high street settings. It also

	its response relevant to high street access and charity retail operation. [england.sh...ter.org.uk]	step into the road, difficulty moving safely, unstable items, blocked access and cluttered streets. They agreed or strongly agreed with the proposed rules.	shows that charity retail premises may recognise both operational and accessibility issues.
The Friendship Group	No clear public source has been identified to verify this group. It should be treated as a respondent-provided organisation name unless further details are confirmed.	Reported difficulty walking past, having to step into the road, unstable items and cluttered streets. They said Council management of pavements was very important and strongly agreed with all proposed rules.	Although the group background cannot be confirmed, the response supports the accessibility and safety case for the policy.
Grain Fete Committee	No clear official source has been identified. Based on the name, this appears to be a local village/event committee connected to Grain. This type of respondent may have practical experience of public space, events, accessibility and risk management, but this should be treated as contextual interpretation rather than confirmed fact.	Selected "None of these" for direct access issues and said Council management of pavements was unimportant. However, they agreed with several proposed rules, including stable items, defined areas, not blocking access points and limiting size/number where needed.	This suggests a more cautious or local event-based view. It may support a proportionate approach where rules are clear but not applied unnecessarily where there is no identified issue.
Intra Community Trust / The Vines Church	Intra Community Trust is a community-led charity focused on the Star Hill to Sun Pier Conservation Area, heritage, regeneration and community collaboration. [intracommu...ust.org.uk] The Vines Church is a local United Reformed Church in Rochester with community activity, including a community garden. [thevinesch...rch.org.uk]	It appears two responses were submitted linked to Intra Community Trust, one jointly with The Vines Church and one separately. One response supported clearer rules but raised concerns about licensing, cost and bureaucracy, suggesting a code of conduct or "pavement friendly business" approach. The other response felt the issue was not the main problem in Intra and highlighted rubbish, neglected buildings, fly tipping and the positive contribution businesses make to the street.	The responses from Intra Community Trust and related local stakeholders suggest existing concern about policies affecting Rochester High Street and the Intra area, particularly where licensing or enforcement may be viewed as an additional burden on local businesses. At the same time, Rochester High Street and the Intra area have heritage, public realm and accessibility considerations, including constrained pavement widths and high pedestrian use. This means clearer standards and consistent enforcement may be needed in some locations to balance business vitality with safe and accessible pedestrian routes. The final policy and guidance should therefore explain why heritage high streets or constrained areas may require closer assessment, while reassuring businesses that decisions will be proportionate and site-specific.

Summary

Overall, organisation responses provide useful stakeholder insight because they reflect accessibility, community, charity, place-based and local event perspectives.

Medway Parents and Carers Forum strongly supported clearer controls to keep pavements safe and accessible for disabled people, SEND families, wheelchair users, people using specialist equipment and people with visual or mobility impairments.

Intra Community Trust and The Vines Church highlighted concerns about licensing, cost, bureaucracy and the impact on local businesses, particularly in Rochester High Street and the Intra area.

Taken together, the organisation responses support a policy that prioritises accessibility and safety, while being proportionate, clearly explained and sensitive to local context.

8. Equality / respondent profile summary

Optional equality monitoring questions were included at the end of the survey. These responses should be treated as supporting context only, as not all respondents answered these questions and the consultation was self-selecting rather than statistically representative.

Question	Key finding
Sex	105 respondents selected female, 58 selected male, 12 preferred not to say, and 37 did not answer.
Age	The largest respondent groups were aged 55 to 64, with 41 responses, and 65 to 74, with 40 responses.
Ethnicity	Most respondents who answered selected White English / Welsh / Scottish / Northern Irish / British, with 146 responses. 15 respondents preferred not to say.
Long-term physical or mental health condition or illness	51 respondents selected yes, 99 selected no, 26 preferred not to say, and 36 did not answer.
Location	The highest numbers of responses came from 45 Rainham, 37 Gillingham, 33 Chatham and 25 Rochester.

Officer interpretation

The equality monitoring responses provide useful context, particularly as **51 respondents reported a long-term physical or mental health condition or illness**. This reinforces the importance of considering accessibility-related feedback, especially comments about wheelchair access, pushchairs, visual impairments, mobility difficulties and people being forced into the road.

Policy consideration

The policy should retain strong accessibility requirements and clear pedestrian route standards. The Diversity Impact Assessment should reflect the consultation feedback, particularly the issues raised by respondents with accessibility needs and by organisations representing disabled people, SEND families and carers.

9. Marketing and engagement activity

The consultation was promoted through a combination of digital communications, targeted stakeholder activity and face-to-face engagement.

Marketing and engagement activity

Activity included:

- social media posts across Medway Council, Transport and Business channels
- articles in eMedway Matters
- a News in Brief article
- inclusion in the Medway Business newsletter
- promotion by Medway Public Protection
- direct engagement with Medway Parents and Carers Forum
- sharing through local community groups
- face-to-face engagement at Medway Mile and Love Gillingham
- direct engagement with businesses in Gillingham and Strood High Streets
- social media support from MP Naushabah Khan
- use of flyers and QR codes

Available performance statistics

Between 1 and 27 July 2026, **23 social media posts** were published across Medway Council Facebook, LinkedIn and Instagram, Transport Facebook and Business X. These generated

- **21,904 reach**
- **32,977 impressions**
- **55 likes**
- **19 shares**
- **104 comments**
- **126 link clicks**

The strongest social media activity took place on **1 July**, with 60 link clicks, followed by **6 July**, with 33 link clicks. Communications reported that the effectiveness of repeat posts reduced after these dates.

The consultation was included in two eMedway Matters newsletters:

Date	Subscribers	Open rate	Total link clicks	Unique link clicks
3 July	13,632	42%	46	35
17 July	13,605	42%	32	22

The two newsletter inclusions therefore generated **78 total clicks** from **57 unique users**.

The Medway Business newsletter was issued on the afternoon of the final consultation day and generated **11 total link clicks** from **9 unique users**. Its effectiveness was limited by the short time subscribers had to respond before the consultation closed.

Medway Public Protection activity and the flyer QR code generated a further **391 recorded link clicks**.

The survey also did not ask respondents how they heard about the consultation, and separate trackable links were not used for every activity. It is therefore not possible to directly attribute completed responses to individual marketing or engagement channels.

Officer evaluation

The range of activity achieved good digital visibility and helped generate **212 completed consultation responses**. Social media was particularly effective during the early stages, while direct

face-to-face engagement helped reach businesses and community organisations that may not have responded through general digital promotion alone.

However, the campaign was more reactive than originally planned. Short preparation times, approval delays, competing Communications priorities and the late inclusion in the business newsletter reduced the opportunity for coordinated promotion and sustained engagement with businesses.

The delayed approval of printed materials also limited the amount of face-to-face engagement that could be completed during the consultation period. Despite this, direct business engagement in Gillingham and Strood provided valuable business and organisation responses.

Overall summary

Overall, the consultation achieved good visibility through social media, newsletters, stakeholder sharing and direct engagement. The strongest early digital engagement followed the first social media posts, while face-to-face activity was valuable for reaching businesses and organisations.

Future consultations would benefit from earlier planning, agreed messages and visuals before launch, timely access to business communication channels, approved engagement materials, and better source tracking through unique links or a “How did you hear about this consultation?” question.

10. Suggested changes to the draft policy

The consultation broadly supports retaining the proposed policy and its core safety and accessibility requirements. The following changes are recommended to address the main concerns raised and make the policy clearer, more proportionate and easier for businesses and residents to understand.

10.1 Policy amendment schedule

Priority	Where in the draft policy	Suggested change	Suggested wording or action
High	Section 1: General	Strengthen the opening explanation of why the policy is needed while maintaining a balanced, business-supportive tone.	State clearly that the policy is intended to protect accessibility and safety, not prevent responsible trading or generate income. Recognise that well-managed displays can support business visibility, high street vitality and attractive public spaces.
High	Sections 1.5 and 4.2: Scope	Clarify exactly what the policy covers and how it differs from the Pavement Licensing Policy.	Add a simple list of what is covered and excluded. Make clear that tables and chairs associated with food and drink premises are normally managed under the separate Pavement Licensing Policy. Remove or clarify references to “informal café spill-out areas” if these are outside this policy.
High	Sections 3.1, 4.1 and 8.2D: Accessibility	Expand the explanation of who can be affected by pavement obstructions.	Refer consistently to disabled people, wheelchair and mobility-aid users, people with visual impairments, people using specialist buggies, people with pushchairs and those who require

			predictable routes. Explain that obstructions can force people into the road or prevent safe and independent travel.
High	Sections 7.2, 7.3, 7.4, 8.2D and Appendix 1, condition 3.11	Explain how the 1.5m clear route will be assessed in narrow, historic or otherwise constrained locations.	Retain 1.5m as the minimum standard, but state that it does not create an automatic entitlement to place items where the existing footway cannot safely accommodate them. Explain when a site assessment will be required and what factors officers will consider.
High	Sections 3.2, 7.2 and 7.4	Strengthen the site-specific and proportionate approach.	State that decisions will take account of pavement width, pedestrian numbers, layout, nearby crossings and dropped kerbs, accessibility, neighbouring premises, highway safety and local character. Make clear that exceptions will only be considered following an evidenced risk assessment.
High	Sections 6 and 7; Appendix 2	Explain the principle of proportionate, risk-based enforcement more clearly.	State that officers will normally begin with advice and an opportunity to put matters right, unless there is an immediate or serious safety risk. Distinguish between minor first-time non-compliance, persistent breaches and immediate hazards.
High	Section 8.1 and Appendix 5: Fees	Explain why fees are charged and what they cover.	State that fees cover the reasonable administration, assessment, inspection and management costs of the licensing process. Avoid wording that could suggest the purpose is income generation. Consider including fee concessions or waivers only where there is an agreed legal and operational basis.
High	Section 8.1 and Appendix 1, condition 2.1	Decide and explain how permission will be shown once a licence is granted.	Confirm whether the approach will be a visible licence in the premises, a digital Council record, an identifier on the item, or a combination. The consultation's most selected option was a visible licence, but business views were more mixed, so the chosen approach should be clear and proportionate.
Medium	Sections 7.1 and 8.2B; Appendix 4	Build in the practical support businesses preferred.	Explain that the licensed area and exact position of items will be agreed with the Council. Include simple diagrams showing compliant and non-compliant placement. Physical pavement markings should only be used where operationally necessary and appropriate.
Medium	Section 8.2B and Appendix	Clarify the meaning of a "defined area" and "directly outside the business".	Define the licensed area as the specific area agreed with the Council. Explain how applications will be

	1, conditions 3.1 and 3.24		considered where a building is set back, has an unusual frontage or cannot place an item immediately outside its entrance.
Medium	Section 8.2B and Appendix 1, condition 3.19	Explain when the Council may limit the number, size or type of items.	State that limits may be applied where necessary to maintain required clear space, prevent clutter or hazards, protect sightlines, avoid encroachment into neighbouring frontages or respond to high pedestrian demand. Decisions should be based on the site rather than a blanket assumption.
Medium	Sections 8.2C and 8.2D; Appendices 3 and 4	Strengthen inclusive item-design requirements.	Require items to be stable, visually noticeable, free from sharp or projecting parts and detectable by people using mobility canes where appropriate. Ensure the tapping-rail requirement is clearly illustrated and applied only where relevant to the item type.
Medium	Section 8.2D and Appendix 1	Expand the list of protected access points.	Refer consistently to entrances, crossings, bus stops, taxi ranks, dropped kerbs, tactile paving, fire exits, delivery access, drainage features and emergency-service access.
Medium	Section 8.2E	Retain and clarify cleanliness responsibilities without widening the policy beyond its scope.	State that the licence holder is responsible for litter, packaging, spillages and waste directly associated with the licensed items or activity. Wider street cleansing, fly tipping and general pavement condition should remain outside this policy.
Medium	Section 7.6: Monitoring	Add a clear public reporting route.	State how residents and businesses can report an unauthorised item, obstruction or unsafe placement, such as through a Council online form. Explain what information will help officers investigate, including location and photographs.
Medium	Sections 3.2 and 7.2	Include special consideration for heritage high streets and constrained areas.	Explain that areas such as Rochester High Street and Intra may require closer site assessment because heritage layouts, narrow pavements, high pedestrian use, events, visitor activity and business needs must be balanced. This should not mean automatic refusal or approval.
Medium	Section 3.4: Outcomes	Add an outcome covering business understanding and voluntary compliance.	Add: "Help businesses understand what is permitted and resolve concerns at an early stage through clear guidance and proportionate officer support."
Lower	Appendix 4: Street Furniture and	Turn the appendix into practical, public-facing guidance.	Include photographs or diagrams showing A-boards, goods displays, planters and other common items. Show the 1.5m measurement,

	Placement Guidance		frontage boundary, dropped kerbs, tactile paving and examples of constrained sites.
Lower	Appendix 5: Applicant Information	Make the application requirements easier to follow.	Add an applicant checklist, clear processing stages, likely timescales, renewal information, contact details and an explanation of what happens if a location is unsuitable.
Lower	Throughout the document	Improve consistency and plain English.	Use one consistent term for “A-board”; correct spacing and formatting errors; define “article”, “licensed area” and “clear footway”; remove duplication between Section 8 and Appendix 1; and ensure headings and numbering are consistent.

The recommended amendments are based on the consultation’s strong support for accessibility and the core proposed rules, alongside concerns about proportionality, business impact, licensing, fees, enforcement and constrained locations.

10.2 Suggested wording for key policy sections

This policy is intended to support safe, accessible and well-managed public highways while recognising the contribution that responsible business activity can make to Medway’s high streets and local centres. It is not intended to prevent appropriate displays or create unnecessary burdens for businesses. Its purpose is to provide clear and consistent expectations so that permitted items can be used without obstructing or endangering highway users.

This would directly respond to concerns that the policy could appear unnecessarily restrictive or focused on raising income. **The suggested wording below has also been simplified and written in plain English to make the policy easier for business owners and other users to understand and follow, while retaining an appropriate policy structure.**

Section 1: Purpose of the policy

This policy explains how Medway Council will manage items placed on the highway, including A-boards, shop displays and planters.

The policy aims to keep pavements safe and accessible while recognising that well-managed displays can help businesses and make high streets more welcoming.

The policy is not intended to prevent responsible business activity or place unnecessary burdens on businesses. It provides clear and consistent rules so that items can be used without causing an obstruction or safety risk.

Section 3.2: How decisions will be made

The Council will consider each location individually.

When assessing an application, the Council will consider:

- the width and layout of the pavement
- the number of people using the area
- the needs of disabled people and other pavement users
- nearby crossings, dropped kerbs, tactile paving and bus stops
- access to neighbouring premises

- visibility and highway safety
- the local setting, including historic or conservation areas
- any other relevant safety or accessibility issues.

Permission will not be granted where items would prevent people from using the highway safely and independently.

Sections 7 and 8: Minimum 1.5m clear route

A continuous pedestrian route of at least 1.5 metres must normally be kept clear at all times.

The clear route will be measured between the edge of the item or licensed area and the nearest kerb, fixed obstruction or other agreed boundary.

The Council may require more than 1.5 metres in busy locations or where additional space is needed for safety and accessibility.

Where a pavement is narrow or constrained, the Council will assess the location individually. A narrow pavement does not automatically mean that items can be placed there. Permission will only be granted where a safe and accessible route can be maintained.

Section 7.4: Exceptional circumstances

In exceptional circumstances, the Council may consider a small departure from the policy where there is a clear public benefit.

The Council will complete a risk assessment before making a decision. Any exception must not create an unacceptable safety risk or prevent disabled people and other pavement users from moving around safely.

An exception at one location does not mean that the same exception will apply elsewhere.

Sections 6 and 7: Proportionate enforcement

The Council will take a fair, consistent and proportionate approach to enforcement.

Where there is no immediate safety risk, officers will normally explain the problem and give the business or responsible person an opportunity to put it right.

Formal enforcement action may be taken where:

- advice or warnings are not followed
- the same problem happens repeatedly
- an item is placed on the highway without permission
- an item causes an obstruction or safety risk.

The Council may take immediate action where an item creates a serious or immediate risk, significantly blocks the highway, or prevents access for disabled people, emergency services or other highway users.

Section 8.1: Why a licence is required

A licence allows the Council to check that the proposed location and items are safe and suitable before permission is given.

It also provides a clear record of what has been approved, where items can be placed and any conditions the business must follow.

The licensing process is intended to support consistent and safe use of the highway.

Section 8.1 and Appendix 5: Licence fees

A licence fee may be charged to cover the reasonable cost of processing the application, assessing the location, issuing the licence and monitoring compliance.

The purpose of the licensing system is to support safety, accessibility and consistent highway management. It is not intended to generate additional income for the Council.

Current fees will be published on the Council's website.

Section 8.1: Showing that permission has been granted

The Council will provide a clear way to show that permission has been granted.

The licence will confirm:

- the items that have been approved
- the agreed location or licensed area
- the licence period
- any conditions that apply.

The Council will confirm whether the licence must be displayed at the premises, recorded digitally, shown to an authorised officer when requested, or shown through a combination of these methods.

This final paragraph should be updated once officers have decided which display method will be used.

Section 8.2B: Agreed location and defined area

All items must be kept within the area agreed with the Council and shown on the licence.

Items must normally be placed directly outside the business and within its frontage. They must not extend into a neighbouring frontage or block access to another premises.

Where a business has an unusual frontage or is set back from the pavement, the Council will assess the location individually.

Items must not be moved outside the agreed area without written permission from the Council.

Section 8.2B: Number and size of items

The Council may limit the number, size or type of items where this is needed to:

- maintain a safe and accessible pedestrian route
- prevent clutter or hazards
- protect sightlines
- keep crossings, entrances and dropped kerbs clear
- prevent items extending into neighbouring frontages
- manage locations with high pedestrian use.

Any limits will be based on the location and the items proposed.

Section 8.2C: Item safety and design

All items must be:

- stable and secure
- maintained in a clean and safe condition
- made from suitable materials
- free from sharp edges or projecting parts
- clearly visible
- positioned so that people can move around them safely
- detectable by people using mobility canes where appropriate.

Items must be safely removed or secured during strong winds or other weather conditions that could make them unsafe.

Section 8.2D: Access points that must remain clear

Items must not block or restrict:

- pedestrian routes
- business and residential entrances
- emergency exits
- pedestrian crossings
- dropped kerbs
- tactile paving
- bus stops and taxi ranks
- access for wheelchair and mobility-aid users
- access for emergency services
- highway drainage
- utility covers or equipment
- access needed for deliveries or highway works.

Section 8.2E: Cleanliness and waste

The licence holder must keep the licensed area clean, tidy and free from waste connected with the items or business activity.

Packaging, spillages and other related waste must be removed promptly.

The licence holder is not responsible under this policy for unrelated litter, fly-tipping or general street cleansing outside the licensed area.

Section 7.6: Reporting a concern

Residents and businesses can report an unauthorised item, obstruction or safety concern through the Council's website.

Reports should include the location, details of the concern and photographs where possible.

The Council will assess reports according to the level of risk. Issues creating an immediate safety or accessibility risk will be prioritised.

Sections 3.2 and 7.2: Historic and constrained locations

Historic high streets and other constrained locations may need a more detailed assessment because of narrow pavements, high pedestrian use, events, visitor activity and the character of the area.

The Council will balance these factors with the needs of businesses and the requirement to maintain safe and accessible pedestrian routes.

Being within a historic or constrained location does not automatically mean that an application will be approved or refused. Each location will be assessed using the same safety and accessibility principles.

Section 3.4: Additional policy outcome

Add the following outcome:

Help businesses understand what is permitted and resolve concerns early through clear guidance and proportionate officer support.

Business guidance commitment

The Council will provide practical guidance to help businesses understand and follow the policy.

Guidance will include:

- clear measurements
- diagrams and examples
- information about common items, including A-boards, shop displays and planters
- examples of suitable and unsuitable locations
- information about the application and enforcement processes
- contact details for advice.

Where appropriate, the Council may agree a defined area with the business as part of the licence.

10.3 Core policy requirements to retain

The consultation showed broad support for the main safety and accessibility requirements in the draft policy. The following requirements should therefore be retained, subject to the clarifications and plain English improvements set out above:

- a **minimum 1.5-metre clear pedestrian route**, with clearer information about how this will be measured and applied in constrained locations
- a requirement for items to be **stable, secure, well maintained and free from avoidable hazards**
- keeping items within an **agreed area directly associated with the business**
- protecting crossings, entrances, bus stops, taxi ranks, dropped kerbs, tactile paving and other important access points
- allowing the Council to limit the **number, size or type of items where this is necessary** for safety, accessibility or effective highway management
- clear requirements for common items, particularly A-boards, goods displays and planters
- a licensing process that records what has been approved, where items may be placed and the conditions that apply
- a fair and proportionate enforcement process
- keeping accessibility central to all site assessments and decisions.

These requirements reflect the areas that received the strongest support through the consultation.

10.4 Checks required before the policy is finalised

In addition to the consultation-led changes, the following checks should be completed before the policy is submitted for approval.

Legal and policy checks

- Confirm that all legislation, statutory powers and enforcement provisions are accurate and current.
- Review the reference to the **Disability Discrimination Act 1995** and confirm whether this should be replaced or supported by reference to current equality legislation.
- Confirm the legal basis for the licensing process, fees, enforcement charges, removal of items, storage costs and disposal arrangements.
- Confirm whether applicants will have a review or appeal route where an application is refused or a licence is revoked.
- Confirm when immediate removal can legally take place without prior warning.
- Complete a legal review of the final wording before publication.

Equality and accessibility checks

- Update the Diversity Impact Assessment to reflect the consultation findings.
- Include the feedback from disabled respondents, carers, wheelchair users and Medway Parents and Carers Forum.
- Check that item-design requirements are suitable for people with visual impairments and people using mobility canes.
- Make sure diagrams and application guidance are accessible and easy to understand.

- Confirm that the 1.5-metre standard and any exceptions are supported by appropriate accessibility and highways guidance.

Operational checks

- Confirm which team will:
 - assess applications
 - carry out site visits
 - issue licences
 - monitor compliance
 - investigate reports
 - undertake enforcement
 - remove and store items.
- Confirm likely application-processing times.
- Decide how frequently licensed locations will be monitored.
- Confirm how urgent hazards will be reported and prioritised.
- Establish a clear online route for residents and businesses to report concerns.
- Check that the proposed process can be delivered using available staffing and resources.

Fees and charges

- Confirm the proposed licence fees and obtain the necessary approval.
- Explain clearly what the fees cover.
- Confirm whether fees will be reviewed annually.
- Decide whether any exemptions, reductions or waivers will apply.
- Confirm whether revisit, warning, removal, storage and disposal charges are reasonable and legally recoverable.
- Publish current fees separately on the Council's website so they can be updated without rewriting the full policy.

Licensing and permission

- Decide how businesses will show that permission has been granted.
- Confirm whether this will be through:
 - a visible licence at the premises
 - a digital Council record
 - an identifier on the approved item
 - a combination of these options.
- Make clear what information will be shown on the licence.
- Confirm how residents and officers can check whether an item has permission.
- Explain what happens when a licence expires, is suspended or is revoked.

Consistency and presentation

- Use **Articles on the Highway Policy** consistently throughout the document.
- Use one consistent spelling and format for **A-board**.
- Define important terms, including:
 - article
 - A-board
 - licensed area
 - clear pedestrian route

- frontage
 - obstruction.
- Remove duplicated requirements from Section 8 and the appendices.
- Check that the main policy and appendices do not give different measurements or conditions.
- Correct typographical, spacing, numbering and formatting errors.
- Replace all temporary or incorrect links with approved Medway Council links.
- Complete the document-control information, including:
 - author
 - owner
 - review date
 - version number
 - approval date
 - revision history.
- Remove outdated drafting notes such as “Rewritten & Fully Integrated” before publication.

10.5 Supporting guidance and communications

The policy should be published alongside practical, plain English guidance for businesses.

The guidance should include:

- a simple explanation of why the policy is needed
- a clear list of items covered by the policy
- an explanation of what is covered separately by the Pavement Licensing Policy
- measurements and diagrams showing the required clear route
- examples of suitable and unsuitable item placement
- examples covering A-boards, goods displays, planters and other common items
- guidance for narrow, historic or unusually shaped locations
- the information needed for an application
- application stages and expected timescales
- licence fees and what they cover
- how permission will be shown
- what happens when conditions are not followed
- contact details for help and advice
- information about how to report an obstruction or safety concern.

The policy launch should also be supported by clear communications explaining:

- the purpose and scope of the policy
- when the policy will take effect
- what existing businesses need to do
- whether any transition or application period will apply
- how businesses can ask for advice
- how enforcement will be introduced
- how consultation feedback influenced the final policy.

The opt-in consultation audience and the developing Medway Highways and Transport newsletter could be used to share these updates and proactively address common concerns.

10.6 Final recommendation

The consultation supports proceeding with the Articles on the Highway Policy, subject to the recommended amendments and the necessary legal, equality and operational checks.

The core safety and accessibility requirements should be retained. However, the final policy should provide clearer information about:

- why the policy and licensing process are needed
- which items and activities are covered
- how the 1.5-metre clear route will be assessed
- how historic, narrow or constrained locations will be considered
- when the Council may limit the number or size of items
- what licence fees cover
- how permission will be shown
- how enforcement will be applied fairly and proportionately
- what practical guidance and support will be available to businesses.

The final policy should prioritise safe and accessible pedestrian routes while recognising the contribution that responsible business activity can make to Medway's high streets and local centres.

Overall conclusion

The consultation evidence supports a clear and consistent approach to managing items placed on the highway. The recommended changes do not alter the main purpose of the draft policy. They are intended to make the policy easier to understand, more transparent and more reassuring for businesses and residents.

Subject to the recommended updates, the policy would provide a stronger basis for balancing accessibility, highway safety, responsible business activity and effective enforcement across Medway.