

Diversity impact assessment

Appendix 2

TITLE
Articles on the Highways Policy
DATE
22 September 2026
LEAD OFFICER
Natalie Beaumont-Robson, Highways Project and Engagement Manager
1 Summary description of the proposed change
What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
Medway Council is proposing to introduce a new Articles on the Highway Policy, which will provide a clear, consistent and enforceable framework for managing items placed on the public highway outside business premises — including A-boards, shopfront displays, stock and other minor articles. The new policy replaces the previously agreed but unimplemented 2016 policy and introduces updated accessibility safeguards. It aims to support local businesses while ensuring pavements remain safe, unobstructed and accessible for all users, particularly people with disabilities who may be disproportionately affected by street clutter.
2 Summary of evidence used to support this assessment
E.g. Feedback from consultation, performance information, service user. E.g. Comparison of service user profile with Medway Community Profile
Evidence informing this assessment includes the draft Articles on the Highway Policy, the results of the public consultation (212 completed responses), key consultation themes, and optional equality-monitoring information provided by respondents. The most relevant evidence relates to issues raised around accessibility, including the experiences of people with disabilities, mobility impairments, visual impairments, wheelchair users and those using pushchairs. Feedback highlighted recurring concerns about obstructed footways, inconsistent placement of A-boards and displays, and the impact these have on safe pedestrian movement. Views from traders were also considered to understand how the policy may affect business operations.

3 What is the likely impact of the proposed change?
Is it likely to:
Adversely impact on one or more of the protected characteristic groups
Advance equality of opportunity for one or more of the protected characteristic groups
Foster good relations between people who share a protected characteristic and those who don't
(insert Yes when there is an impact or No when there isn't)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	No	Yes	Yes

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Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Disability	No	Yes	Yes
Gender reassignment	No	No	No
Marriage/civil partnership	No	No	No
Pregnancy/maternity	No	Yes	Yes
Race	No	No	No
Religion/belief	No	No	No
Sex	No	No	No
Sexual orientation	No	No	No
Care experience	No	No	No
Other (e.g. low income groups)	No	No	No

4 Summary of the likely impacts

Who will be affected?

How will they be affected?

The policy is expected to have a positive impact on people who are disproportionately affected by obstructions on pavements. This includes disabled people, older people, people with mobility difficulties, people with visual impairments, carers, wheelchair users, people using pushchairs, and others who rely on clear and predictable pedestrian routes. Emergency services may also benefit from improved access where footways are kept unobstructed.

By introducing clearer rules for items placed on the highway, the policy will help ensure pavements remain safer, more accessible and easier to navigate, supporting independent movement for people who may otherwise face barriers caused by street clutter.

There may be indirect impacts on businesses, particularly smaller traders, where the policy introduces clearer requirements around licensing, placement, monitoring and enforcement. These impacts are expected to be manageable through clear guidance.

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5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

Medway Council will provide clear, accessible guidance for businesses on how items should be placed safely on the highway, including the need to maintain minimum clear pedestrian routes and avoid creating barriers for disabled people, older people, wheelchair users and those using pushchairs.

The policy will be implemented in a fair, consistent and proportionate way, supported by clear information on licensing, monitoring and enforcement. This approach will help minimise any adverse impact on small businesses while ensuring pavements remain safe and accessible.

Consultation feedback will be fully reviewed before finalising the policy, and any practical adjustments needed to improve accessibility or reduce unnecessary impact on traders will be considered. Ongoing engagement with business groups and disability organisations will help foster good relations and support smooth implementation.

6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Review consultation feedback and consider any changes needed to the draft policy.	Natalie Robson	10 August 2026
Produce clear guidance for businesses explaining how items should be placed safely, including maintaining clear routes and avoiding barriers for pedestrians.	Natalie Robson	November 2026
Monitor feedback, reports and enforcement activity after implementation to identify any accessibility issues or unintended impacts.	Natalie Robson	Apr-Sept 2027

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7 Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

The recommendation is to proceed with the implementation of the Articles on the Highway Policy, as the assessment indicates that the policy will improve equality of opportunity by helping to keep pavements safer, clearer and more accessible for all users. This includes disabled people, older people, people with mobility difficulties, people with visual impairments, carers and people using pushchairs, who are disproportionately affected by street clutter and unpredictable pedestrian routes.

Any potential adverse impacts on businesses are expected to be limited and can be effectively managed through clear guidance, proportionate implementation, and ongoing monitoring. These measures will support traders to comply without creating unnecessary burden, while ensuring the accessibility benefits of the policy are realised.

There are no alternative approaches that would deliver the same level of accessibility improvement or meet the Council's statutory duty to manage obstructions on the highway. The recommended option therefore represents the most balanced and equitable way forward.

8 Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Deputy Director

Date of authorisation