

Comments to Pavement Policy Consultation

Other Public Comments:

<p>Surrey Highways</p>	<p>Thanks for sending this through. My comments below</p> <p>Public Liability insurance usually renews annually so we would recommend the maximum licence duration was no more than 12 months.</p> <p>2.5 Could a comment be added within the Planning section to the effect that</p> <p>“this does not change the usual adopted public highway and Section 130 of the Highways Act. Other permits or permissions maybe required from other authorities. For example, the use of Advertising board (A Boards) within or part of the license is not considered acceptable, and the County Councils A Board policy will apply. “</p> <p>3.1 plan to include any fixed or immovable object, e.g. lamp column, bollards, etc.</p>
<p>Business</p>	<p>Why is it that considering our business are only just recovering after COVID AND the cost of living trade slump does the pavement licensing fee have to increase to £350.00 per year. This is eqvialnt to 1 whole weeks worth of coffee sales... Why are we penalised all the time!!! It is hard enough trying to make the business succeed as it is.</p>
<p>Visit Staines</p>	<p>We appreciate the opportunity to provide feedback on the proposed pavement licence policy and, in principle, agree with the policy's direction. However, we would like to raise two specific concerns:</p> <p>1. Fee Increase: The proposed increase in the fee from £100 to £500 is notable. While we recognize that this amount is common across many regions, we would like to point out that other boroughs in Surrey have opted for a more modest fee:</p> <ul style="list-style-type: none"> ○ Elmbridge: £50 ○ Mole Valley: £100 ○ Tandridge: £100 <p>Would the Council consider reducing the fee to a more comparable amount? Alternatively, could there be provisions to protect smaller businesses, perhaps by adjusting the fee based on turnover?</p>

	<p>2. Glass Policy: The issue of glass usage has been raised multiple times over recent months, with significant support from Surrey Police. While we are not advocating for a full ban, we propose a restriction on glass usage during evenings and weekends. We understand that concerns have been raised about waste management and single-use plastic, but there are practical alternatives available. I have previously shared examples of reusable plastic options that address these concerns, and I am attaching further information, including the Surrey Police's support for a no-glass policy and links to examples of multi-use plastic cups.</p> <p>We hope you will take these points into consideration as you finalize the policy.</p> <p>Thank you for your time and attention.</p>
<p>Counter Terrorism</p>	<p>Thank you for your invitation to submit comments with regards to Spelthorne Borough Council 'Draft Pavement Policy 2024 – 2029'</p> <p>These comments are submitted from the perspective of the Counter Terrorism Security Advisor (CTSA) role. Comments have been made taking into account MHCLG document Pavement licences: guidance - GOV.UK (www.gov.uk) published 2nd April 2024 including signposted information contained within Section 5.3 'How can local authorities consider security?'</p> <p><i>Policy Inclusions.</i></p> <p><i>We would recommend under Section 3.5 of your Policy, 'Site Assessment' that 'public health and safety including security' is included as a criteria for considering the suitability of an application. We interpret this condition as being wider than Covid issues, applying to security in general.</i></p> <p><i>Without this inclusion, any comments made taking into account the remaining factors of public amenity and accessibility, would be limited and not allow for recommendations within the MHCLG guidance at Section 5.3 'How can local authorities consider security?'. Our primary objective as consultees being to assist Local Authorities ensure a balanced consideration for security implications, particularly the risk to groups of people from interaction with hostile vehicles, and the creation of large crowds in new public spaces.</i></p> <p><i>In order to assist with managing the security risks we propose additional conditions for inclusion at Appendix 2. These</i></p>

	<p><i>conditions will ensure that the applicants are educated as to the risks to groups of people from interaction with hostile vehicles and the creation of large crowds in a new public space, and in a cost effective non burdensome manner. They align with your existing policy Condition 11 in regards to minimising the safety and risk to customers / users of the public highway / adjacent land or premises, and are as follows:</i></p> <p>Condition</p> <p><i>(i) Pavement Licence Applicant to confirm they have considered security implications from the additional pavement seating, particularly the risk to groups of people from interaction with hostile vehicles, and the creation of large crowds in public spaces. The considerations will be assisted by completing measures at subsections (ii) and (iii)</i></p> <p><i>(ii) Pavement Licence Applicant to confirm staff employed by or at the premises have completed the free ACT Awareness E-learning within a reasonable period not exceeding one month from the grant of a pavement licence. ACT Awareness e-Learning ProtectUK</i></p> <p><i>(iii) Pavement Licence Applicant to confirm the premises management team have accessed the Protect UK website or downloaded the Protect UK Mobile Phone APP and viewed Risk Management Basics ProtectUK and Hostile Vehicle Mitigation (HVM) ProtectUK as part of the application process.</i></p> <p>I am more than happy to discuss any of the above inclusions, and should the above wording not be compliant with how you would like the Policy written, please let me know any revised wording you propose.</p> <p>In addition we will still look to suggest additional conditions/comments on a case by case basis for those locations deemed to present an enhanced security risk as allowed for in Section 4 of your policy where necessary and proportionate.</p>
<p>Member of Public</p>	<p>I write to praise and endorse the response sent by *REDACTED* from SCAN.</p> <p>Of course it is pleasant for customers to sit outside cafes, particularly in summer. But this should not be at the expense of people with disabilities. I attend the Spelthorne Older People's Forum and the Forum for Physical & Sensory Disabilities, and there are a lot of people in Spelthorne living with mobility or sensory impairments. They are also entitled to enjoy our streets. It is not just wheelchair users who need space: narrow spaces are also difficult for anyone with</p>

	<p>problems with mobility or with balance, particularly if pavements slope or have obstacles or irregularities. Pavement cafes need barriers suitable for users of long canes or guide dogs. Barriers should be in colours which contrast with the ground and with walls or other obstacles. This is important for partially sighted people, who may not have canes or dogs.</p>
Planning	<p>Licensing, Thank you the opportunity to comment on the Council's Pavement Policy. Having reviewed the Policy, the LPA has no comments to make.</p>
Member of Public	<p>Thank you for consulting me on this draft policy. I am broadly in favour of the policy as drafted but am concerned that interpretation may not be clear and that appropriate enforcement may not be applied in all cases.</p> <p>Under Standard Pavement Licence condition.7 "the method of marking the boundary of the licensed area must be agreed between the licence holder and the Licensing Department. Whatever method is agreed a 2 metre clear walkway must be maintained for the use of pedestrians". This 2.0m is reiterated under the National Conditions, which adds " A minimum width of 1500mm could be regarded as the minimum acceptable distance between two obstacles under most circumstances, as this should enable a wheelchair user and a walker to pass each other. This is qualified elsewhere in the guidance. The condition requires that a seating area must be clearly marked and the license application must therefore implicitly include barriers. Under condition 23. "The licence holder will only take orders/serve customers who are seated and must ensure that customers are not standing in the licensed area with food or drink" To me this implies table service is mandatory. When combined with the need for barriers around the seating in condition 7, the use of table service ensures the position of furniture can be monitored and is less likely to be moved to create obstructions.</p> <p>I note under National Conditions Advertising boards are not included in the definition of furniture within the pavement licensing. I am concerned about this but appreciate this is outside the Council's licensing regime.</p> <p>Looking further at the subject of barriers I see that National conditions includes "any need for a barrier to separate furniture from the rest of the footway so that the visually impaired can navigate around the furniture, such as colour contrast and a tap rail for long cane users." This effectively precludes the use of a single 'rope' between posts such as at The George and promotes the use of 'solid' full height barriers. I consider the use of fabric barriers suitable to achieve this in most cases. I hope that my comments will enable you to ensure placement</p>

	of furniture on pavements in a manner which avoids obstruction and hazards and is in accordance with Governments guide to best practice, as noted at the bottom of the document.
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