



Agenda - Scrutiny Working Group (Review of Policy for Commercial Use of the Highway)

Time: 3:00pm

Date: Tuesday 18 September, 2018

Venue: Datteln Room

1. Apologies

2. Declarations of Interest from Members

To declare any personal, pecuniary or disclosable pecuniary interests in accordance with the Code of Conduct and any possible contraventions under Section 106 of the Local Government Finance Act 1992.

3. Notes of previous meeting

To approve the notes of the meeting held on 21 August, 2018 and agree any actions.

4. Review of Policy for Commercial Use of the Highway

- Briefing Note of the Head of Economic Prosperity (Item 4.1 – 4.3) Enclosed
- Commercial Use of Highway – List of options (Item 4.4 – 4.7) Food, Safety and Licensing Manager (Enclosed)
- To determine the recommendations to the Promoting Prosperity Scrutiny Committee

To: Councillors:

Mrs. M. Davis

A. Dudson

P. Hewitt

M. Sutherland

By Invitation: Councillor Mrs. C. Martin – Health and Wellbeing Portfolio Leader

Officers:

D. Piper Head of Economic Prosperity

P. Beckley Building Control Manager

D. Prosser-Davis Food, Safety and Licensing Manager

W. Rowe Senior Committee Officer

Date Despatched: 11 September, 2018

CANNOCK CHASE COUNCIL
NOTES OF THE
SCRUTINY WORKING GROUP -
REVIEW OF POLICY FOR COMMERCIAL USE OF THE HIGHWAY
TUESDAY 21 AUGUST, 2018 AT 3.00 P.M.
HELD IN THE DATTELN ROOM, CIVIC CENTRE,
BEECROFT ROAD, CANNOCK

Present:

Councillor M. Sutherland (Chairman)
Councillor Mrs. M. Davis
Councillor P. Hewitt

By Invitation:- Councillor Mrs. C. Martin
(Health and Wellbeing Portfolio Leader)

Officers: P. Beckley, Acting Head of
Economic Prosperity

David Prosser-Davies, Food,
Safety and Licensing Manager

1. Apologies for absence

An apology for absence was received from Councillor A. Dudson.

2. Declarations of Interests from Members

Councillors P. Hewitt and M. Sutherland had declared that they were Staffordshire County Councillors at the previous meeting.

3. Notes of Previous Meeting

The notes of the previous meeting were agreed. With regards to page 3 Councillor Mrs. Davis asked whether Staffordshire County Council had been asked when they intended to review their 2007 Policy. The Chairman confirmed that he had spoken to the County Council who had advised they had not set a timescale within which to review their Policy but acknowledged that it would be a good time to do this now.

4. Review of Policy for Commercial Use of the Highway

The Chairman asked Members to provide feedback on the site visits they had

made of the District in order to assess what was in place in each town and also provide feedback on how traders considered the policy had affected them.

Councillor Mrs. M. Davis advised that she had visited Rugeley on Monday and been to Cannock today and was a regular visitor to Hednesford. The A Boards and tables and chairs in the town centres looked nice and were positioned correctly. Tables and chairs had barriers surrounding them which provided some protection to customers sat at the chairs. With regard to Cannock she considered that, when looking at the advice of the RNIB, there were a number of obstacles which could cause an obstruction to pedestrians in addition the A Boards and tables and chairs. Additionally she made reference to shops that had a porch area. If the trader had permission from the landlord they could display the A Board in the porch as it was their land and didn't form part of the highway. In Chadsmoor she noted that there were a number of A Boards and these had been tied to bollards which were owned by the Council. However, she acknowledged that Chadsmoor was not yet included in the policy. The Food, Safety and Licensing Manager confirmed that with regards to shops that had porches which were not publicly owned highway land the policy did not apply.

The Chairman asked whether the policy applied to alleyways with shops either side that were thoroughfares. The Officer confirmed that the policy only applied to highway land, not privately owned land even it is was a thoroughfare.

The Acting Head of Economic Development clarified that Cannock Shopping Centre had a ban on the displaying of A Boards. Members sought advice with regard to the flower stall that had tables displaying flowers outside of their stall within the shopping centre. The Officer confirmed that the flower stall occupied a unit owned by St Modwen and would have an agreement with them.

Councillor P. Hewitt then provided feedback of his visits to the town centres. He advised that certain businesses depended upon the A Boards in order to increase custom – shops like Barbers and Cafes particularly. He had spoken to many traders who had commented that without the A Boards their businesses would struggle. However, many traders commented on the cost implications which had a negative affect on their businesses. Most of the traders considered that the use of A Boards and table and chairs needed regulating but expressed concern that the policy was another burden on the smaller, independent retailers, who were already struggling to make a living.

The Chairman asked for confirmation on the parameters for business rates and the Acting Head of Economic Development said that he would obtain details from the Revenues and Benefits service.

The Chairman then provided feedback to the Group on his visit to Rugeley town centre which he had undertaken with Councillor Dudson. He circulated as summary of comments received and a number of photographs showing some examples of A Boards displayed in Rugeley town centre which he agreed to email to the Acting Head of Economic Development. He commented that there were a number of A Boards outside the Brewery Street arcade and these premises was very busy. He had also spoken to the County Council and been provided with a

leaflet entitled “Guidelines for the use of A Boards and Merchandising Displays on the Highways in Staffordshire”. This provided good examples of how to display materials in the highway along with useful information. He circulated copies to the Group. He considered that this leaflet should be used in the future to help traders be aware of how best to display A Boards, merchandising displays and tables and chairs. He said takings for small businesses were low and that it might seem other local authorities were doing a lot more to help these businesses. He said it was recognised that the Council did need a policy, but needed one which made sense and could apply across all areas, and that the Council wanted the town centres and shops to do well.

The Health and Wellbeing Portfolio Leader commented that the “good practice” photographs in the leaflet showed exactly what the Council was trying to achieve by introducing the policy. She added that a lot of the A Boards in Rugeley had been removed in recent weeks. The main concern from traders was in connection with Morrison’s and the fruit and vegetable store opposite. However, this was privately owned land and was exempt from the policy. She confirmed that the majority of traders agreed with regulating the siting of the A Boards and tables and chairs but were concerned about the cost of the permits.

Councillor Hewitt made the point that it was an offence under the Highways Act to obstruct the highway and questioned whether the policy was necessary. He asked why the permit fees had been introduced when there was a law already in place. He added that traders could be reminded that it was in the Highways Act, 1980 that the highway should not be obstructed and their insurance would be compromised if they didn’t comply.

The Health and Wellbeing Portfolio Leader made reference to the petition that had been received from the MP Amanda Milling objecting to the introduction of the policy (this was included at Appendix 7 of the Briefing Note). She commented that the MP would have been contacted when the policy initially went out to consultation and no objection had been received.

The Group discussed the responses received from the consultees, in particular the response from the Traders Associations as it wasn’t clear who they were representing. Councillor Hewitt was concerned that, although only 23 responses had been received, some of these were from trade associations which might have been representing many businesses. The Chairman added that a 6% response to a consultation was considered good. He commented that it was only after the policy was introduced that traders started to take notice and make complaints.

The Chairman then asked the Acting Head of Economic Development and the Food, Safety and Licensing Manager to outline the Briefing Note (Item 4.1 – 4.2) and appendices which had been circulated to Members.

The Food, Safety and Licensing Manager referred Members to the benchmarking of other Local Authority Commercial Obstructions Policies (Appendix 1 of the Briefing Note). He commented that the authorities that have a policy all appear to do things differently. In addition, there was a range of fees and charges applied by the authorities. He confirmed that Councils can only legally cover their costs

and not generate an income from the fees charged. The Health and Wellbeing Portfolio Leader asked for clarification regarding the policy adopted by Lichfield District Council which stated “voluntary code for A Boards”. The Officer advised that they had adopted a similar approach to what was outlined in the County Council’s Guidelines leaflet. They request traders to comply with the requirements of the policy and would take action if the requirements were not followed.

With regards to the enforcement aspect of the policy the Chairman outlined the advice received from the County Council in a letter that had been received on 20 August, 2018. This stated that the County Council supported the District Council and, if necessary, would remove any obstructions on the highway if there was a clear risk to the highway; they would not enforce where a trader has not paid or would not pay for a permit. The Officer commented that this was a different response to what had been received when the consultations were undertaken and this would need to be taken into account as part of the review. Councillor Hewitt considered that the advice from the County Council was correct in that they would support the District Council if there was a health and safety issue. They would be supportive if an obstruction was making the highway unsafe but would not assist in instances where traders did not have a permit.

The Acting Head of Economic Development made reference to Appendix 2 of the Briefing Note in relation to the planning issues. He confirmed that A Boards and tables and chairs did require planning permission. A number of authorities asked traders to apply and pay for planning permission whereas Cannock Council had not adopted this approach. The reason for this was lack of resources in relation to planning enforcement – it was not seen as a priority and would stretch the workload of the Enforcement Officer. He then outlined the Economic Development teams view on the policy (Appendix 3) who had highlighted that Cannock Shopping Centre had banned the use of A Boards.

The Chairman then asked the Group to give consideration to the recommendations they wished to make to the Scrutiny Committee. He considered that the County Council’s leaflet entitled “Guidelines for the use of A Boards and Merchandising Displays on the Highways in Staffordshire” should be used to assist traders in the future. Ideally this could be emailed to the traders to cut down on costs. The Acting Head of Economic Development advised that if paper copies needed to be produced (where no email addresses were available) this would have cost implications. The costs of developing a leaflet in house could be explored.

The Chairman also referred to miniature signposts he had seen erected in Ludlow and questioned whether they could be used in certain areas of the town centres rather than the traditional A Boards. The Health and Wellbeing Portfolio Leader suggested that the Local Authority for Ludlow should be contacted to establish whether the sign posts were provided by the Local Authority or by the traders themselves.

Councillors Hewitt and Sutherland commented that consideration should be given to whether to continue charging for the permits. They were of the opinion that a policy was required in order to regulate the siting of the A boards and tables and

chairs. However, smaller businesses were having difficulty due to the cost of the permit whereas the larger retailers were able to afford it. The Chairman added that the policy was not fair as it hit the smallest retailers the hardest. Consideration should therefore be given to retaining a policy but considering whether there was a need to charge for a permit. Councillor Mrs. Davis pointed out that if no charge was applied there would be no money to enforce it.

The Chairman suggested that Members should get together outside of the Working Group to discuss the notes of the meeting and begin to formulate recommendations to take to the Scrutiny Committee. The Acting Head of Economic Development advised that he would put together a series of options for the Group to consider. This would include:-

- Whether the policy should be extended beyond the largest town centres and/or District wide;
- Retaining a policy without charging for the permits;
- Developing a Code of Practice with soft enforcement.

Members could then consider these along with the notes of the meeting and prepare their findings and decide what recommendations to take to the Scrutiny Committee. A further meeting of the Working Group would therefore be held on Tuesday 18 September, 2018 at 3.00pm. An additional meeting of the Promoting Prosperity Scrutiny Committee would also need to be arranged for the purpose of considering the recommendations of the Working Group. The Officer from Democratic Services would contact the Chairman of the Scrutiny Committee, Councillor Mrs. M. Davis to agree a suitable date.

The Acting Head of Economic Development advised the Group that the new Head of Economic Prosperity would be taking up his position at the beginning of September. Members requested that the Acting Head of Economic Development continue to be involved in the Working Group meeting and the additional Scrutiny Committee to see the review through.

The Chairman thanked Officers for the information they had prepared for the Working Group.

AGREED:

- (A) That the Acting Head of Economic Development prepare a number of options based on the discussions taken place as outlined above.
- (B) That Members meet outside of the Working Group to consider the options prepared by the Acting Head of Economic Development together with the notes of the meeting and begin to formulate their findings and recommendations.
- (C) That a further meeting of the Working Group be held on Tuesday 18 September, 2018 at 3.00pm to agree their findings and recommendations for consideration by the Scrutiny Committee.

- (D) That an additional meeting of the Promoting Prosperity Scrutiny Committee be arranged in October on a date to be agreed by the Chairman of the Scrutiny Committee with the purpose of considering the findings and recommendations of the Working Group.

Meeting finished at 4.20pm.

ITEM NO. 4.1

Briefing Note of:	Head of Economic Prosperity
Contact Officer:	Paul Beckley
Telephone No:	4408

Promoting Prosperity Scrutiny Committee
Working Group to Review the Policy for Commercial Use of the Highway
18 September 2018

1 Purpose of Briefing Note

- 1.1 The purpose of this briefing note is to provide the details requested by Members of the Working Group at the meeting on 21 August 2018 together with additional information.

2 Key Issues

- 2.1 At the meeting of the Working Group on 21 August 2018 Members requested additional information to enable them to be able to complete the review of the Policy. This briefing note provides this information.
- 2.2 Members also requested that a series of options for the Policy be produced which they could consider and then make appropriate recommendation to the Scrutiny Committee.

3 Detail

Options for Commercial Use of the Highway

- 3.1 The Food, Safety and Licensing Manager has produced an options paper. This has been previously circulated to Members and is included as a separate paper on the Agenda

Business Rates

- 3.2 The Local Taxation and Benefits Manager has supplied the following information.
- 3.3 The Council has very little input into the amount payable. The Rateable Value of a property is set by the Valuation Office Agency and the amount payable is given by multiplying this by the 'multiplier' which is set by Government. Different multipliers apply for under or over £50,000 Rateable Value. There are then a variety of reductions available depending on circumstances

- Small Business rate relief is the most common and available where traders have only 1 property
 - Where Rateable Value is up to £12,000 pay nothing
 - For Rateable Value in range £12,000 to £15,000 they get a reduced reduction on a sliding scale, but still pay at the lower multiplier
 - For Rateable Value in range £15,000 to £50,000 payments are based using the lower small business multiplier
 - For Rateable Value of over £50,000 payments are made at a higher multiplier.
- Transitional Relief applies to any property facing a big increase following the general re-valuation in 2017.
- Cannock Chase Council has a Government funded discretionary reduction scheme which will cap the amount increase over the 2 years from 2016-17 to 2018-19 to 16%
- Charities get 80% relief as a matter of course. The Council can top that up via its discretionary scheme, with conditions. (maximum £10,000 relief and no relief if Rateable Value exceeds £100,000)
- The Council has discretionary relief schemes for new businesses starting up, and in particular occupying empty properties in the town centres.

Ludlow Signposts

- 3.4 Information has been received from Ludlow Town Council. They have stated that the fingerpost signs in the town are the responsibility of Shropshire Council and do not advertise individual businesses. The Town Council do not have an A board policy. Any queries regarding A boards are forwarded to Shropshire Council so they can assess whether there are any health and safety issues.
- 3.5 Shropshire Council does have a Pavement Permit Policy which covers pavement cafes and other non-permanent furniture or structures placed on the highway. An application fee is charged for the permit and there is an annual renewal charge. The policy does not cover A boards.

Budget and Licence Fees

- 3.6 A budget revenue stream was not predicted and built into the budget when the Policy was introduced. The simple aim was to recover identified costs. As A Board permits are valid over 3 years, the income from each application is apportioned over 3 financial years, whereas income from all 1 year pavement café licences and occasional gazebo/fairground rides is credited in the year the application is made. The anticipated costs and therefore the anticipated total revenue for this year for all the licences in the policy is £7,973.00.
- 3.7 The total revenue taken to period 5 in this budget year is £2,267.00, comprising the apportioned £822.00 of A Board income, £1095.00 for café licences and £350.00 for fairground rides/gazebos etc.
- 3.8 At present it is difficult to estimate income for 2019/20 since the outturn from 2018/19 will not be known until June 2019 after the 2019/20 budget and fees have been set. Normal practise is to base this on previous years income but as

ITEM NO. 4.3

this is the first year of operation this is far from certain. On present basis we could expect possibly 10% new A Board applications, Pavement Café licence renewals at the same rate and possibly same numbers of fairground ride/gazebos licences. This would give a projected revenue in the region of £5642.00, comprising the apportioned £822.00 for A Boards plus estimated £280.00 from new A Board applications; £3,790.00 from renewed pavement café licences and an estimated £750.00 from fairground rides/gazebos etc.

- 3.9 It should be noted that the Councils costs may vary from year to year, depending on numbers of applications, as illustrated in Table 2 of the Options Paper. If costs are under recovered then in subsequent years fees may have to rise to compensate for this.
- 3.10 Should the County Council not be willing to take enforcement action in the event of non payment of fees, this is likely to undermine all efforts to recover costs.

4 Implications (if applicable)

None

5 Appendices

None

Background Papers

None

Notes on Options for Commercial Use of the Highway

Summary

The Commercial Use of the Highway policy was introduced to:

- Benefit the local economy by allowing businesses to use the highway for advertising, promotion and sales;
- Add interest, vitality, colour and life to our town centres;
- Promote equality and protect public safety, particularly amongst those with mobility difficulties or the visually impaired;
- Ensure fairground ride operators were DBS checked;
- Ensure safe, unhindered access for emergency services;
- Implement risk-based proportionate controls and treat all businesses equitably;
- Ensure non compliant businesses do not gain unfair competitive advantage.
- In line with the Equality Act 2010, to take reasonable measures to allow disabled people not to be disadvantaged by physical features;

Options A to D in Table 1 below illustrate a number of approaches open to the District Council to control use / obstruction of the Highway. There are of course other possible options, for example, the Council could adopt a pavement café policy only, like Shropshire Council, and exclude A Boards, or could examine whether to require planning permission for A Boards and Pavement Cafés.

A key point is that Staffordshire County Council, as the statutory Highways Authority, decides whether and to what extent to resource enforcement of commercial highways issues and the District has little influence in this.

Where there is no mechanism to enable the District Council to recover its costs, it could be argued that the function should remain with the County, where enforcement of Highways issues is already funded through Council Tax. Any additional funding for local District enforcement could be seen as the public paying twice for the same service.

A further consideration is that, where any licence, permit or consent is currently issued by the District Council and legislation permits the local authority to recover its reasonable costs, then this is the approach that is always adopted. If the Council were to decide to retain some form of licensing or permit system, and not to recover its costs, this would be a significant departure from all other similar licensing regimes (for example, street trading, scrap metal dealers, taxi licensing, pet shops etc.).

Table 2 shows the financial implications for businesses of the differing options, depending on whether these options are adopted for Town Centres only or District wide, and also estimated costs depending on the numbers of applications received.

Table 1 - Commercial Use of the Highway – summary of available options

OPTION	SUMMARY OF KEY FEATURES							
	WHERE POLICY APPLIES	£5M PUBLIC LIABILITY INSURANCE REQUIRED (Note 4)	LIMIT ON ONE PROPERLY CONSTRUCTED A BOARD, WITH TAPPING RAIL, PER BUSINESS. 2M CLEARANCE TO ROAD	PAVEMENT CAFES WITH CLEARLY DEFINED SEATING AREA, SAFE FURNITURE, PARASOLS, HEATERS ETC.	DBS CHECK FOR OPERATIVES OF CHILDRENS' FAIRGROUND RIDES (Note 5)	SANCTION IF NO LICENCE IN PLACE? (e.g if licence not issued due to non payment of fee or no insurance) (Note 6)	SANCTION FOR ITEMS CONSIDERED DANGEROUS (Note 7)	ESTIMATED TOTAL COSTS TO CCDC OVER 3 YEARS 2018-2021 INC (Notes 1 and 8)
A – PRESENT POLICY – FEES COVER ADMINISTRATION & COMPLIANCE COSTS (Note 1)	TOWN CENTRES	YES	YES	YES	YES	NO	YES (CCDC directly involved)	NIL (full cost recovery)
	DISTRICT WIDE	YES	YES	YES	YES	NO	YES (CCDC directly involved)	NIL (full cost recovery)
B -PRESENT POLICY CONDITIONS USED BUT NO FEES AND CCDC ABSORBS COSTS (Note 2)	TOWN CENTRES	YES	YES	YES	YES	NO	YES (CCDC directly involved)	£23,920
	DISTRICT WIDE	YES	YES	YES	YES	NO	YES (CCDC directly involved)	£33,280
C - GIVE BUSINESSES SCC HIGHWAYS GUIDANCE AND ADVICE ONLY (Note 3)	TOWN CENTRES	ADVICE ONLY	ADVICE ONLY	ADVICE ONLY	NO	N/A	YES (CCDC not directly involved)	Use existing budgets
	DISTRICT WIDE	ADVICE ONLY	ADVICE ONLY	ADVICE ONLY	NO	N/A	YES (CCDC not directly involved)	Use existing budgets
D - DO NOTHING – CCDC LEAVES HIGHWAYS ISSUES TO SCC AS STATUTORY HIGHWAY AUTHORITY AND REFERS ALL ENQUIRIES TO SCC	TOWN CENTRES	NO ACTION	NO ACTION	NO ACTION	NO	N/A	YES (CCDC not involved)	NIL
	DISTRICT WIDE	NO ACTION	NO ACTION	NO ACTION	NO	N/A	YES (CCDC not involved)	NIL

Table 1 Notes :

1. The current Policy includes a fee structure to allow the Council to fully recover its costs, in line with the County Council's suggested mechanism for licensing detailed in Option 1 of their Policy (para 5.2.2, page 7, see below). Though charging and cost recovery is clearly envisaged as part of this option (para 6.1.2, page 10, see extract below), the County Council have recently indicated that they would not support the District Council in recovering their costs.
2. This option is similar to Option 2 from the County Policy (para 5.2.2, page 8, see extract below).
3. This option relies on CCDC officers carrying out the advice and guidance whilst undertaking routine work in other areas (for example, food inspection, licensing visits, economic development activity etc.) and assumes use of County Council information leaflets and signposting to SCC website only.
4. Staffordshire County Council requires £5 million public liability insurance, as is common with other local authorities with such policies, for the placement of items on the Highway.
5. Where a fairground ride is permitted within a town centre, the current Policy requires the applicant to undergo a DBS check; without the Policy there would be mechanism to require this check;
6. Sanctions would have to be imposed by the County Council, as the statutory Highway Authority. The County Council have recently indicated they would not be willing to support the District Council in taking action in the event of non compliance with policy conditions, such as failure to pay a fee, or failure to provide public liability insurance. The County Council have stated they will not take enforcement action solely on the basis that a business hasn't obtained a licence / permit.
7. Sanctions would have to be imposed by the County Council, as the statutory Highway Authority. Staffordshire County Council have recently indicated they would become involved in taking action only where an item clearly obstructed and / or posed a danger on the highway and that enforcement action would be based on the risk posed in each given location.
8. Total costs are estimated over a three year period as this is the length of an A Board or display permit. Costs assume that all A Board permits are applied for and that pavement café licences issued are renewed twice during this period. Costs give are for A Boards and Pavement cafes only.

Extracts from County Council Management of Commercial Obstructions Policy (2007 as amended):

"5.2.2 The management of this Policy will be undertaken by the District Councils within Staffordshire who may choose one of two mechanisms for controlling the establishment & usage of 'A' boards, retail / trade displays and Street Cafés that are located on the public highway within their respective boundaries:

Option 1 – A District Council may either adopt this Policy to develop a licensing procedure, or, utilizing the contents of this Policy to provide an outline of the minimum standards that SCC considers acceptable, develop their own Policy and associated licensing procedure that is specifically designed to meet the needs and the character of their area;

Option 2 - The Conditions of Use contained within this Policy, together with existing highway, planning, advertisement, licensing and health & safety legislation, may be employed to manage the use of these items, with a targeted, risk based approach being used to monitor any obstruction or nuisance issues that may arise that may require enforcement action to be undertaken.

6.1.2 District Councils may levy reasonable initial licensing charges and annual renewal administration charges, with these charges being reviewed annually. "

Table 2 - Financial Implications for businesses

OPTION		APPLICATIONS MADE %	NUMBER OF A BOARDS	3 YEAR PERMIT FEE £ (rounded)	NUMBER OF PAVEMENT CAFES	ANNUAL FEE PAYABLE PER UNIT £*
A	TOWN	100	144	85.00	25	85.00
	CENTRES	50	72	100.00	12	100.00
	DISTRICT	100	250	80.00	30	70.00
	WIDE	50	125	90.00	15	175.00
B	TOWN	100	144	No fee	25	No fee
	CENTRES	50	72	No fee	12	No fee
	DISTRICT	100	250	No fee	30	No fee
	WIDE	50	125	No fee	15	No fee
C	No application process					
D	No application process					

*Unit is defined as a table and up to 4 chairs

Table 2 Notes:

- Table 2 shows the costs to businesses arising from options A-D. For each option, application of the Policy both to Town Centres only and District Wide is shown. In addition, an illustrative fee is shown depending on whether applications are made for all obstructions (100%) or whether half are applied for and half are removed and not then subject to an application .
- A fee has been established and set on the basis of total number of applications. For example, if 144 “A Board” applications are made, the cost to each applicant is £85.00, as costs are shared between all applicants. If the number of applications fell by 50% to 72, the fee per applicant would rise to £100.00.
- This is because whilst time spent on administration and compliance would decrease, some elements are unchanged irrespective of the number of applicants (for example, time on policy development, website updating, computer system and software, office costs, support costs, officer and member training etc.).
- Note that, for Option B, where the business pays “No fee” the fee per application would then have to be met by the Council, in line with those for option A .