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Contact Officer:

John Armstrong,
Democratic Services & Elections Manager
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20 December 2021

Dear Councillor

Your attendance is requested at a meeting of the **EXECUTIVE** to be held in the Council Chamber - Millmead House, Millmead, Guildford, GU2 4BB on **TUESDAY 4 JANUARY 2022** at 7.00 pm.

Yours faithfully,
Tom Horwood

Joint Chief Executive
Guildford & Waverley Borough Councils

MEMBERS OF THE EXECUTIVE

Chairman:

Councillor Joss Bigmore (Leader of the Council)

Vice-Chairman:

Councillor Julia McShane, (Deputy Leader of the Council and Lead Councillor for Community and Housing)

Councillor Tim Anderson, (Lead Councillor for Resources)

Councillor Tom Hunt, (Lead Councillor for Development Management)

Councillor John Redpath, (Lead Councillor for Economy)

Councillor John Rigg, (Lead Councillor for Regeneration)

Councillor James Steel, (Lead Councillor for Environment)

Councillor Cait Taylor, (Lead Councillor for Climate Change)

WEBCASTING NOTICE

This meeting will be recorded for live and/or subsequent broadcast on the Council's website in accordance with the Council's capacity in performing a task in the public interest and in line with the Openness of Local Government Bodies Regulations 2014. The whole of the meeting will be recorded, except where there are confidential or exempt items, and the footage will be on the website for six months.

If you have any queries regarding webcasting of meetings, please contact Committee Services.

QUORUM 3

THE COUNCIL'S STRATEGIC FRAMEWORK (2021- 2025)

Our Vision:

A green, thriving town and villages where people have the homes they need, access to quality employment, with strong and safe communities that come together to support those needing help.

Our Mission:

A trusted, efficient, innovative, and transparent Council that listens and responds quickly to the needs of our community.

Our Values:

- We will put the interests of our community first.
- We will listen to the views of residents and be open and accountable in our decision-making.
- We will deliver excellent customer service.
- We will spend money carefully and deliver good value for money services.
- We will put the environment at the heart of our actions and decisions to deliver on our commitment to the climate change emergency.
- We will support the most vulnerable members of our community as we believe that every person matters.
- We will support our local economy.
- We will work constructively with other councils, partners, businesses, and communities to achieve the best outcomes for all.
- We will ensure that our councillors and staff uphold the highest standards of conduct.

Our strategic priorities:

Homes and Jobs

- Revive Guildford town centre to unlock its full potential
- Provide and facilitate housing that people can afford
- Create employment opportunities through regeneration
- Support high quality development of strategic sites
- Support our business community and attract new inward investment
- Maximise opportunities for digital infrastructure improvements and smart places technology

Environment

- Provide leadership in our own operations by reducing carbon emissions, energy consumption and waste
- Engage with residents and businesses to encourage them to act in more environmentally sustainable ways through their waste, travel, and energy choices
- Work with partners to make travel more sustainable and reduce congestion
- Make every effort to protect and enhance our biodiversity and natural environment.

Community

- Tackling inequality in our communities
- Work with communities to support those in need
- Support the unemployed back into the workplace and facilitate opportunities for residents to enhance their skills
- Prevent homelessness and rough-sleeping in the borough

AGENDA

ITEM NO.

1 APOLOGIES FOR ABSENCE

2 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST

In accordance with the local Code of Conduct, a councillor is required to disclose at the meeting any disclosable pecuniary interest (DPI) that they may have in respect of any matter for consideration on this agenda. Any councillor with a DPI must not participate in any discussion or vote regarding that matter and they must also withdraw from the meeting immediately before consideration of the matter.

If that DPI has not been registered, the councillor must notify the Monitoring Officer of the details of the DPI within 28 days of the date of the meeting.

Councillors are further invited to disclose any non-pecuniary interest which may be relevant to any matter on this agenda, in the interests of transparency, and to confirm that it will not affect their objectivity in relation to that matter.

3 MINUTES (Pages 5 - 12)

To confirm the minutes of the meeting of the Executive held on 23 November 2021.

4 LEADER'S ANNOUNCEMENTS

5 *PUBLIC CONVENIENCES REVIEW (Pages 13 - 104)

**6 CARAVAN SITE LICENSING: FIT AND PROPER REGULATIONS
(Pages 105 - 134)**

7 UNIVERSAL BASIC INCOME (UBI) (Pages 135 - 168)

8 EXCLUSION OF THE PUBLIC

The Executive is asked to consider passing the following resolution:

“That, under Section 100A (4) of the Local Government Act 1972 (as amended) and Regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the public be excluded from the meeting for consideration of agenda item 9 on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the 1972 Act”.

**9 EASEMENT OVER SHALFORD COMMON AT CHINTHURST LANE (Pages
169 - 178)**

Key Decisions:

Any item on this agenda that is marked with an asterisk is a key decision. The Council's Constitution defines a key decision as an executive decision which is likely to result in expenditure

or savings of at least £200,000 or which is likely to have a significant impact on two or more wards within the Borough.

Under Regulation 9 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, whenever the Executive intends to take a key decision, a document setting out prescribed information about the key decision including:

- the date on which it is to be made,
- details of the decision makers,
- a list of the documents to be submitted to the Executive in relation to the matter,
- how copies of such documents may be obtained

must be available for inspection by the public at the Council offices and on the Council's website at least 28 clear days before the key decision is to be made. The relevant notice in respect of the key decisions to be taken at this meeting was published as part of the Forward Plan on 7 December 2021.

EXECUTIVE

* Councillor Joss Bigmore (Chairman)

* Councillor Julia McShane
Councillor Tim Anderson
Councillor Tom Hunt

* Councillor John Redpath
* Councillor John Rigg
* Councillor James Steel

*Present

Councillors Ramsey Nagaty, Paul Spooner, Fiona White and Catherine Young were also in attendance.

EX38 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Tim Anderson and Tom Hunt.

EX39 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST

There were no declarations of interest.

EX40 MINUTES

The minutes of the meeting held on 26 October 2021 were confirmed as a correct record. The Chairman signed the minutes.

EX41 LEADER'S ANNOUNCEMENTS

The Leader congratulated all of those who had contributed to the recent Remembrance events. A service had been held to add the name of Lieutenant Nicholas London to the war memorial, a gathering with a minute's silence had been held on Armistice Day, 11 November and a full Remembrance Day Parade and Service on Sunday 14 November.

'Zero-Carbon Guildford' opened in the town centre on 20 November and was well attended with local members. Located at the bottom of North Street, 'Zero' was a climate emergency centre where local people could learn about eliminating waste, reduce emissions and protect the natural environment. The Leader urged everyone to make a visit to 'Zero'.

On Thursday 25 November Guildford would join in solidarity with others around the world in support of eliminating violence towards women. Tunsgate and the Guildhall would be floodlit in orange to send a message that violence towards women would not be tolerated. The Mayor, Councillor Marsha Moseley and the Deputy Leader, Councillor Julia McShane would be in attendance at the event. It was noted that the Safer Guildford Partnership had contributed funding in support of the South West Surrey Domestic Abuse Outreach Service and contact details were available on the Council's website.

The Leader was pleased to inform councillors about forthcoming Christmas pantomimes and many other celebratory performances, including 'Dick Whittington' at the Yvonne Arnaud Theatre, various festive musical and comedy events at the Electric Theatre including 'A Christmas hug' performed by the People's Theatre and written by Councillor Steven Lee.

EX42 LOCAL COUNCIL TAX SUPPORT SCHEME 2022-23

Local Council Tax Support (LCTS), otherwise known as Council Tax Reduction (CTR), helped around 4,500 households with low incomes in the borough to pay their Council Tax, by providing £5.8 million of support. The cost of providing the support was shared with Surrey County Council, with Guildford's share being about 10%. The Council was under a statutory duty to annually review its LCTS scheme, was obliged to consult with interested parties and to approve a scheme for the 2022-23 financial year by 31 January 2022, to enable annual bills to be calculated correctly.

The Executive considered a report setting out the proposals for the next financial year arising from the latest annual review. The report was introduced by the Leader of the Council in the absence of the Lead Councillor for Resources.

In 2021-22, the Council had agreed some small changes to the scheme to account for inflationary pressures. By increasing Personal Allowances, Premiums and Non-Dependant Deductions. The cap on Band E entitlement for 2021-22 was removed to provide additional help during the pandemic. The discretionary hardship fund was increased for 2021-22 in anticipation of an increase in unemployment levels and calls for help.

For 2022-23, it was once again proposed to increase Personal Allowances and Premiums which was forecast would have a revenue cost of £2,500. The discretionary hardship fund would be reset at £40,000 for the coming year as the economic outlook had improved.

The stakeholder consultation had been undertaken between 24 September and 13 October 2021. Surrey County Council and Surrey Police and Crime Commissioner were in agreement with the proposals and just one other response had been received. Whilst this was disappointing the submission was also supportive.

Councillors considered the complexities of LCTS at the Strategy and Resources EAB on 14 June 2021. The Board would like the recalculation linked to Universal Credit to be looked at. This was a complex matter and would be considered as part of the longer Future Options review.

The Leader commended officers for the quality of the report.

The Executive

RESOLVED: To recommend to Council at its meeting on 7 December 2021:

- (1) That the current Local Council Tax Support Scheme (which is on our website), be amended for 2022-23 as set out in detail in Appendix 1 to the report submitted to the Executive, with effect from 1 April 2022.
- (2) That the Council maintains a discretionary hardship fund of £40,000 in 2022-23, and carries forward any residual 2020 and 2021 COVID19 Council Tax Hardship Funds.

Reasons:

1. To ensure that the Council complies with government legislation to implement a LCTS scheme from 1 April 2022.
2. To maintain a discretionary fund to help applicants suffering from severe financial hardship.

EX43 LOCAL PLAN DEVELOPMENT MANAGEMENT POLICIES

The Executive considered a report concerning the second part of Guildford's draft Local Plan. If adopted, the Development Management Policies (DMP) would, together with the adopted Local Plan: Strategy and Sites document (LPSS), supersede the existing Local Plan 2003 and become part of the Council's Development Plan. The report provided the more detailed policies to be used by Development Management in the determination of planning applications.

The Leader of the Council introduced the report and noted that although there had been much detailed debate about the draft Local Plan policies, it was important to remember that the primary function of development management was to secure good development management for the future of the borough. The report set out a wide range of policies on environmental, heritage, design and more detailed infrastructure matters. The intention of the draft policies was to test planning applications and to deliver to exacting, sustainable and attractive standards. The draft policies would set the standard expected from development and also provide a reason to refuse planning applications should those standards not be met. The draft policies had been drawn up in line with the National Planning Policy Framework (NPPF) and other national standards, but were specific to Guildford.

The report had been considered by the Joint EAB on 20 September 2021 and the recommendations of the Board were set out in Appendix 8. Councillor Ruth Brothwell had chaired the meeting of the Board and submitted some additional written comments that were read to the meeting by the Democratic Services and Elections Manager. The Board had proposed some 71 amendments to 26 policies and a small group of cross-party councillors had met to prioritise those which were of greatest concern. Officers had thereafter made some amendments to the report that was presented to the Executive. The Joint EAB was eager that Regulation 19 was carried forward and the final DMP for Guildford published to enable a proper review of the Local Plan and to continue with all the right emphases. The Joint EAB had commended the DMP to the Executive for submission to Council.

The Leader acknowledged the amount of work undertaken through interaction between officers, councillors and the public to reach the current point in the process. Following the Regulation 18 consultation there had been 16 two-hour meetings of the cross-party Local Plan Panel, other numerous councillor sessions and an additional period of time to fully review the recommendations of the Joint EAB. Although there had not always been consensus between everyone throughout the process, the Leader thanked all of those who had participated in the discussions.

In coordination with the Council's new Corporate Plan the policies would protect the environment strengthening the standards for new buildings in terms of carbon reduction commitments and requiring net gains in biodiversity of 20% which was greater than that set by Central Government. There would be new policies relating to parking, encouraging low-car or no-car developments areas well-served by public transport in order to increase air quality and encourage greater use of sustainable modes of travel. The Council would also enable the development of low-carbon or renewable energy sites to support the transition to cleaner energy sources.

Policies would support discounted house opportunities for first-time buyers or, if that were not possible then to require developers to allocate a greater percentage of the development as affordable. In addition, there were twenty new design policies to ensure new development held respect for its location and protect local character and heritage assets. There would also be protection for open spaces, public houses and community facilities.

If approved by the Executive, the report and the DMP would be presented to Full Council on 7 December for approval to proceed to the Regulation 19 Consultation stage.

There was a further recommendation to consult on the Parking Supplementary Planning Document at the same time as the Development Management Policies so as to add support to Policy ID11 and for future flexibility.

The Leader would undertake further discussion with Planning Policy officers with regard to the application of design codes on non-strategic development sites. Reference was made to the development on The Street in West Horsley as an example where three separate developers had been involved which had fragmented the approach to the site.

The Leader reflected that developers might find the policies onerous whilst environmentalists may suggest the Council had not gone far enough, but was content to commend the DMP report to the Executive as being thorough and evidence-based. Consequently, the Executive

RESOLVED: To recommend to Council at its meeting on 7 December 2021:

- (1) That the draft Local Plan: Development Management Policies document, subject to further investigation as to the merits of extending the requirement for design codes to all housing sites allocated in the Development Plan, be put before Full Council for approval for Regulation 19 public consultation and to approve a six-week period of consultation beginning in early January 2022.
- (2) That the draft Parking Supplementary Planning Document be put before Full Council for approval for public consultation for a four-week period beginning in January 2022.
- (3) That the Lead Councillor with portfolio responsibility for Planning Policy be authorised, in consultation with the Director of Strategic Services, to make such minor alterations to improve the clarity of the documents referred to in paragraphs (1) and (2) above, as they may deem necessary.

Reasons:

The recommendations above are made to encourage the Council to:

- (1) Enable the draft Local Plan: Development Management Policies document to be published for public consultation.
- (2) Allow officers to undertake public consultation in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, the Planning and Compulsory Purchase Act 2004, the National Planning Policy Framework 2021, Planning Policy for Traveller Sites 2015, the National Planning Practice Guidance, and the Council's Statement of Community Involvement 2020.
- (3) Undertaking a public consultation on the draft Local Plan is a statutory requirement placed on Local Planning Authorities under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('Local Planning Regulations') and will enable the Council to move closer to adopting the second part of the Local Plan as required by law and policy.

EX44 REVIEW OF THE LOCAL DEVELOPMENT SCHEME

The report submitted to the Executive sought agreement for an updated Local Development Scheme (LDS) for the new Local Plan: Development Management Policies. The LDS set the timetable for plan production and opportunities for stakeholders to be involved in the process. The timetable at Appendix 1 to the report set out the timetable in respect of the process up to the adoption of the new Local Plan in early 2023.

The Executive,

RESOLVED: That the Local Development Scheme, as set out in Appendix 1 to the report submitted to the Executive, shall have effect from 1 December 2021.

Reason:

To progress the new Guildford Borough Local Plan: Development Management Policies by having a Local Development Scheme with an up-to-date timetable for the Local Plan.

EX45 FINANCIAL MONITORING 2021-22

The Executive considered a report that summarised the projected outturn position for the Council's general fund revenue account, based on actual and accrued data for the period April 2021 to September 2021.

The report had been reviewed by the Corporate Governance and Standards Committee on 18 November 2021 and the comments arising were set out on the Supplementary Information Sheet.

In the absence of the Lead Councillor for Resources, the Leader of the Council introduced the report.

The meeting heard that the Covid pandemic continued to have a negative effect on the Council's finances and that steps would need to be taken to mitigate those effects and maintain a sound financial position. The general fund summary was set out in Appendix 1 of the report predicting a gross overspend of £2.6m. There was a positive effect coming from a reduction in minimum revenue provision, lower interest rates on the loans portfolio and receipts from North Downs Housing resulting in a net projected overspend of £1.76m. The main cause of the overspend was the reduction in car parking revenues estimated to be in the region of £3.7m which had been offset to some extent by Government's fees and charges reclaim scheme. However, the scheme had closed in June 2021 and there was no indication it would be resumed. There was a reduction in the value of the leisure management contract of £800,000. The direct Covid expenditure of £300,000 had been offset by Government for the full year. Finally, there was a £500,000 overspend in Planning which was partially due to staff expenditure to clear a backlog and also to provide cover for senior staff illness. On a positive note, the pre-application service would now be able to resume in the New Year and return services to normal functioning levels.

The report had set out ways in which the Council could prevent further impacts on reserves. There would be a capital return fund investment of £1.5m and the original investment would be reinvested in a suitable way. This would be a one-off opportunity to mitigate budget shortfall whilst the mid-term position remained the same with an additional £1.5m required to balance the budget for 2022-23.

The Leader reflected that with the fast-changing Covid scenario the Council should remain prudent and advised the Executive to agree the recommendations set out in the report. The Executive, consequently,

RESOLVED:

- (1) That the results of the Council's financial monitoring for the period April 2021 to September 2021, be noted.

- (2) That the actions set out in paragraph 4.3 of the report submitted to the Executive to achieve in-year savings to help reduce the overspend and mitigate the impact on reserves, be approved.
- (3) That the implementation of a “voluntary expenditure freeze” across services, be approved.

Reason:

To enable the Executive to respond to the scrutiny of the Council's finances.

EX46 GENERAL FUND DRAFT BUDGET 2022-23 AND MEDIUM TERM PLAN 2022-23 TO 2025-26

The report before the Executive outlined the position of the 2022-23 draft general fund budget and the business planning assumptions for 2022-23 to 2025-26. The final budget position would be submitted to Full Council on 9 February 2022. The Savings Strategy for 2022-23 to 2025-26, which the Executive had approved on 22 June 2021, had set out the assumptions used in calculating the budget gap and therefore the quantity of savings required over the medium term. The core assumptions underpinning the draft budget had been reviewed and the revised assumptions were set out in the report.

In the absence of the Lead Councillor for Resources, the Leader of the Council introduced the report. The Joint Executive Advisory Board had considered the outline budget report at its meeting on 11 November 2021 and a summary of their comments were set out on the Supplementary Information Sheet.

The Leader highlighted the overview table in the executive summary of the report and described the inflationary underlying assumptions in the report as optimistic, pay as a result of inflation was realistic and any increase in fees and charge as under-ambitious. It was noted the assumptions for Council Tax income was accurate as Council Tax charges were constrained at below a 2% increase unless the Council called a referendum. The report included the best assumptions about the level of government funding that would be available. Anticipated rental income rises were modest. The Bank of England forecast was that inflation would fall in the coming year. The meeting heard that a 1% rise in inflation would mean a loss of £300,000 to the Council. Based on the assumptions in the report it was currently estimated there would be a budget shortfall for the forthcoming year of £1.7m and a cumulative shortfall of £5m up to 2026 but with a variance in the budget gap for the longer-term period of between minus £3m to minus £11m.

Because it was still early in the budget process, the report was clear that there were areas of uncertainty that would influence the final position.

Until the local government finance settlement was announced it was uncertain if the Government would proceed with recompensing local authorities for the planned rise in National Insurance contributions as had been stated. The cost of the increase would amount to a figure in the region of £300,000 and had been included in the assumptions until the offset was confirmed.

The report and the work of finance officers was commended and the Executive,

RESOLVED:

- (1) That the budget assumptions used in the preparation of the 2022-23 draft budget and three year forward projections be approved.

- (2) That the current position on the draft budget for 2022-23 and the budget shortfall anticipated over the three years to 2024-25, be noted.
- (3) That the savings identified as part of the savings strategy for 2022-23 through to 2025-26 (Sections 11,12,13 of, and Appendix 3 to, the report submitted to the Executive) which have been included in the draft budget, be approved.
- (4) That the in-year savings of £46,750 arising from the review of classical music, book festival, voluntary and CAB grants for 2021-22, which were not included as part of the 2021-22 budget, be approved.
- (5) That the additional growth items identified in section 11 and Appendix 3 which have been included in the draft budget, be approved.
- (6) That the proposal to Council to make the contributions to/from the Council's various earmarked reserves for specific purposes as set out in section 9 of the report as part of the budget report in February 2022, be approved.

Reason:

To assist the Executive in the preparation of the General Fund estimates for 2022-23.

EX47 PARISH COUNCILS - CONCURRENT FUNCTIONS GRANT AID APPLICATIONS FOR ASSISTANCE 2022-23

The Council's concurrent functions grant aid scheme provided financial assistance to parish councils. Concurrent functions were services which both the Borough Council and the parish councils were empowered to undertake. The grants took the form of grant funding up to a maximum of 50% and that percentage decreased for projects costed at over £10,000. The grant budget was £90,000. Parishes were asked to complete a detailed application form and written estimate for each project and identify how the project meets at least one of the fundamental themes within the Council's corporate plan.

The Executive considered a report setting out details of the 33 requests received from 17 of the 23 parish councils in the borough, which totalled £97,828. One bid had subsequently been retracted. The bids brought forward for approval therefore totalled £97,109, which was £7,109 over the base budget of £90,000. The Executive was requested to agree that the remaining balance be met from the Parish Council Urgent Schemes Reserves to achieve a balanced budget.

As a part of the Council's Savings Strategy, the Executive had been asked to consider reducing the scheme budget to £60,000 for 2022-23. The Leader suggested that this recommendation be referred to an Executive Advisory Board (EAB) for review before the Executive made a final decision on the matter. Following discussion, it was proposed that the EAB review should also include the scheme's award criteria.

Having considered the report and the applications, the Executive

RESOLVED:

- (1) That the Concurrent Functions Grant Aid budget for 2022-23 be set at £90,000, subject to final confirmation by the Council at its budget meeting in February 2022.
- (2) That consideration of future years' budgets for Concurrent Functions Grant Aid, from 2023-24, be referred to an EAB for further discussion together with a review of the award criteria, following the Director of Resources' recommendation to reduce it to £60,000 p.a.

- (3) That the parish council requests for grant aid for 2022-23, as set out in Appendix 3 to the report submitted to the Executive, be approved.
- (4) That the remaining balance of £7,109 be met from the Parish Council Urgent Schemes Reserve.

Reasons:

- (1) To assist parish councils with expenditure on concurrent function schemes in 2022-23.
- (2) To enable parish councils to take account of financial assistance from Guildford Borough Council when calculating their precept requirements for 2022-23.

EX48 SELECTION OF THE MAYOR AND THE DEPUTY MAYOR 2022-23

At its meeting on 7 December 2021, the Council would be asked to consider nominations for the Mayoralty and Deputy Mayoralty of the Borough for the municipal year 2022-23.

The constitutional changes adopted by the Council in April 2014 as part of the review of the Civic Function in respect of the Mayoralty provided that the Council would normally elect the Deputy Mayor appointed at the annual meeting of the Council as Mayor at the next succeeding annual meeting. The Council was therefore requested to consider formally the nomination of the current Deputy Mayor, Councillor Dennis Booth for the Mayoralty of the Borough for 2022-23.

Following an invitation to Group leaders to submit nominations for the Deputy Mayoralty for 2022-23, the Executive noted that the only nominee had been Councillor Masuk Miah.

The Executive therefore

RESOLVED: To recommend to Council on 7 December 2021:

- (1) That the Deputy Mayor, Councillor Dennis Booth be nominated for the Mayoralty of the Borough for the 2022-23 municipal year.
- (2) That Councillor Masuk Miah be nominated for the Deputy Mayoralty of the Borough for the 2022-23 municipal year.

Reason:

To make early preparations for the selection of the Mayor and Deputy Mayor for the 2022-23 municipal year.

The meeting finished at 7.57 pm

Signed

Chairman

Date

Executive Report

Ward(s) affected: Ash Wharf, Friary and St Nicolas, Holy Trinity, Lovelace, Onslow, Tillingbourne

Report of Director of Service Delivery

Author: Stuart Riddle – Project Lead: Public Conveniences Review

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Lead Councillor responsible: James Steel

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Date: 4 January 2022

Public Conveniences Review

Executive Summary

On 1 April 2021 the Service Delivery Executive Advisory Board (EAB) supported a mandate to commence a public conveniences review. The recommendation was to investigate the removal of grant funding from Ash and Shere Parish Councils (£14,040) and produce a long list of 8 toilets, from the 16 we provide, to seek limited closures.

The review identified 8 locations and produced an officer's recommendation noting 4 toilets and the removal of grant funding. These locations were chosen due to both operational reasons, and nearby alternative provisions for residents and visitors. The officer's recommendation was taken to the Service Delivery EAB on 4 November 2021 and their consideration has informed this report.

Recommendation to Executive

1. That the closure of up to 5 of our public conveniences be approved in principle.
2. That public convenience grants are removed from Ash and Shere Parish Councils.
3. That, subject to a review of responses from a public consultation, the Head of Operational and Technical Services, in consultation with the Lead Councillor for Environment, be authorised to determine which toilets should be closed in March 2022.

Reason(s) for Recommendation:

To achieve £65,000 per annum savings in the public conveniences budget, starting in the 2022/23 financial year.

Is the report (or part of it) exempt from publication?

No

1. Purpose of Report

- 1.1 To advise the Executive of the outcome of the Service Delivery EAB's consideration into the public conveniences review. It was agreed that, due to the Council's financial position, this review is needed.
- 1.2 Seek approval for the closure of 4 or 5 toilets, and removal of grant funding, allowing us to remove the vacant toilet cleaner post, and achieve budget savings of £65,000 per annum.

2. Strategic Priorities

- 2.1 Guildford Borough Council currently operates 16 public toilets across the Borough. We also provide grant funding to Ash and Shere Parish Councils, to support their provision.
- 2.2 The Budget Survey 2021, undertaken by SMSR Research, asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services we provide (see a table of these results in Appendix 1).
- 2.3 We have no legal duty to provide public conveniences but look to still maintain a high-quality provision after achieving £65,000 in budget savings.

3. Background

- 3.1 Although the provision of public toilets is not a legal duty, we have historically provided these for residents and visitors. We currently provide 16 public conveniences, 10 of which are in the GU1 area. All are well maintained and well used by residents and visitors to the Borough. They support the use of parks, car parks and those visiting the Borough's shops and attractions. We have a rolling refurbishment plan, funded by capital, to ensure the facilities are in good condition.
- 3.2 The Council is faced with financial difficulties so must look to cut spending in a way that minimises impact on residents and to ensure good value for money. The Service Delivery EAB confirmed its support for the public conveniences mandate on 1 April 2021, so that a business case could be developed with a view to bringing forward a long list of possible closures for consultation. Options 3 and 4 of the mandate were to be investigated – removal of grant funding from Ash and Shere Parish Councils and seeking limited closures. All of the considered options are outlined in section 13 below.
- 3.3 A long list of public conveniences was created and included Allen House, Bedford Road, Farnham Road, Onslow Recreation Ground, Ripley, Tunsgate, Ward Street and Woodbridge Road. The reasons for these toilets forming part of the long list, alongside any immediate issues in the event of closure, can be

found within Appendix 2 (Public Conveniences Report to the Service Delivery EAB – 4 November 2021).

3.4 The Service Delivery EAB agreed that, due to the Council's financial position, that this review is needed. The EAB's advice can be seen in section 12 below.

3.5 The officer's recommendation is that as part of the consultation there is a preference for Allen House, Bedford Road, Ripley, Woodbridge Road to be closed, or passed to another organisation. These 4 locations will allow us to suitably reduce the workload and remove the vacant toilet cleaner post.

The exact locations of closures will be decided following a review of public consultation responses. The cost implications of choosing one location over another are minimal. The important thing is that the above 4 locations will allow us to suitably reduce the workload in order to remove the vacant toilet cleaner role. The reduction in staff and vehicle cost is the majority of the aimed £65,000 savings.

Ripley was chosen for operational reasons, because if it is not closed as 1 of 4 then a total of 5 will need to be closed instead. The remaining 3 locations all have nearby publicly accessible alternatives.

3.6 The difference in closure numbers is because of the distance Ripley is away from our base of operations, Woking Road Depot, and the distance away from all the other toilets we provide in the Borough. Currently, we pay Ripley Parish Council to open and close Ripley toilets on our behalf. If the toilet was to close, or be passed to the Parish Council, this funding would stop.

It is acknowledged that there are currently no publicly accessible provisions nearby in Ripley, according to national mapping, with Parish residents and visitors having to rely on the private sector if this location closes. We do remain hopeful that Ripley Parish Council will take over the Ripley toilets. However, as Ripley toilets have the lowest footfall of those surveyed in 2018 it was important to ensure our recommendation was for 4 facilities, rather than 5, therefore minimising the overall impact on Borough residents and visitors. A report from Healthmatic, setting out results of a usage survey in 2018, is attached as Appendix 3.

3.7 The project is expected to close on Friday 1 April 2022, ensuring the annual budget savings are delivered for the 2022-23 financial year. This means the Head of Operational and Technical Services, if authorised as described in the recommendation to the Executive, will have 4 to 5 weeks after consultation to determine, in consultation with the Lead Councillor, which toilets should be closed and enact the closures.

3.8 It is noteworthy that neighbouring Waverley Borough Council have closed the vast majority of their public toilets over the past years. Many Town and Parish Councils, alongside community groups, stepped in to take some of the toilets over.

4. Stakeholder Consultation

4.1 Parish Councils

Ash, Ripley and Shere Parish Councils are major stakeholders in this review. The most recent and relevant contact can be seen as Appendices 4 to 8. In summary, all three Parish Councils are objecting to the review's plan to close or remove grant funding from the toilet most relevant to them. Ripley Parish Council have said they cannot afford the additional expense of taking over the Ripley toilets, in addition to the £40,000 they already spend on The Green. Ash and Shere Parish Councils note the strain the removal of grant funding will put on their budgets, and that they have heavy use from residents and visitors from outside of their Parish areas.

4.2 Onslow Village Tennis Club have replied in opposition to closing the Onslow Recreation Ground toilets highlighting its importance to users of the recreation ground. They also note that they have no ability or funding to take over the toilets (see Appendix 9).

4.3 Experience Guildford have previously registered objection to town centre toilet closures. More recently, they highlighted that Business Improvement Districts cannot replace a service and only add or enhance an existing project, service or project. The previously thought possibility of Experience Guildford taking over a town centre toilet is now ruled out (see Appendix 10).

4.5 We are still awaiting response from Woodbridge Road Café and are in early discussions with Guildford Sportsground Management Company, regarding the Woodbridge Road facilities.

4.4 Waverley Borough and Farnham Town Councillor David Beaman is speaking at this meeting in his role as Chair of the South West Surrey Disability Empowerment Network and as a member of the Guildford Access Group. Our past contact largely focused on alternative ways to generate funding, as an alternative to closures (Councillor Beaman's comments are set out in Appendix 11).

5. Public Consultation

5.1 Public consultation is due to take place starting mid-January 2021 for 6 weeks. We will set our officer's recommendation as a preference, but the toilets to close will be chosen by reviewing the consultation's responses.

5.2 We will be encouraging parish councils, residents' associations, community groups, places of worship, local NHS Trusts, charities, Government support groups and local businesses to respond to the consultation. This includes groups like the Guildford Access Group, Experience Guildford, Surrey Coalition of Disabled People, Age UK and the Royal Surrey NHS Foundation Trust.

6. Key Risks

- 6.1 It is acknowledged that there has been, and will be, extensive negative feedback from all external stakeholders as we are removing some service provision.
- 6.2 There is potential for toilet closures to affect our future budding to retain Green Flag and Purple Flag awards.
- 6.3 Closures could impact on the number of visitors to the Borough in a post COVID world. This made equalities impacts very important and work will be ongoing to increase publicly accessible provision via The British Toilet Association's "Use Our Loos" scheme and The Great British Toilet Map.
- 6.4 A correct balance between the benefit of cost savings and the negative impact on, or perception with, residents need to be ensured. The officer's recommendation, for preference at consultation, tries to minimise the impact on residents while delivering much needed cost savings.

7. Financial Implications

7.1 Public Convenience Budget

Salaries and on costs	£92,000
Overtime	£22,000
Operating costs (utilities/consumable)	£35,000
Transport	£18,000
Maintenance	£19,000
Grants	£14,000
Overheads	£47,000
Business Rates	£8,000
Depreciation	£54,000
Income	(£16,000)
Total Budget	£293,000

- 7.2 The £65,000 savings will largely come from removing a vacant grade 1 toilet cleaner role, and reducing the number of vehicles in the service accordingly. This will reduce the salaries and on costs and transport parts of the budget by 1/3, or £36,600.
- 7.3 The closure of up to 5 of our facilities will reduce the revenue expenditure of the operational costs, maintenance, overheads and business rates part of the budget. To what extent savings are made in these categories largely depends on what locations are chosen after consultation.
- 7.4 If the 4 locations in the officer's recommendation are chosen after consultation the budget savings across the above-mentioned categories will be £13,830. When including staffing and vehicle costs the total revenue saving would be

£50,430. If the £14,040 grant funding is also removed, we will achieve savings totalling £64,470.

- 7.5 If we close the lowest budget cost 5 locations, we will achieve budget savings of £11,860, within the same categories. This scenario includes 5 locations because it does not include Ripley.
- 7.6 If we close the highest budget cost 4 locations, we will achieve budget savings of £19,760, within the same categories.
- 7.7 Due to the above, the exact location of closures has minimal impact on the overall savings target of £65,000, when in comparison to staffing and vehicle costs.
- 7.8 The combinations of locations chosen for closure produce a relatively small spread between the lowest and highest budget savings, compared to the overall target. Therefore, we believe it is important to place more emphasis on minimising the impact on residents, public opinion, and operational efficiency. This is how the locations in the officer's recommendation were decided and why the locations should be chosen by reviewing the results of the public consultation.
- 7.9 The project is expected to close on Friday 1 April 2022, ensuring the annual budget savings are delivered for the 2022-23 financial year.
- 7.10 Closure of facilities will also reduce future refurbishment costs, that are funded by capital. The scope of these savings depends on the locations chosen. However, capital expenditure reductions are long term and not within the scope of this review. They are also heavily dependent on future quality vs cost decisions.
- 7.11 The toilet cleaner role is currently being covered on a temporary basis, and the individual will move back to their full-time street scenes post. This means there are no redundancy implications.

8. Legal Implications

- 8.1 By way of information S87 Public Health Act 1936 confers a discretionary power on the Council to provide public conveniences and also powers to transfer them to other providers. Consultation must be conducted in line with the principle set out in Gunning v Brent LBC 1985 case – timed at a stage early enough in the process to be meaningful, provide sufficient information to be meaningful, adequate time is provided for consultees to provide a response and the responses are conscientiously and adequately considered.

9. Human Resource Implications

- 9.1 Management will have to notify the individual temporarily covering the vacant toilet cleaner role that they are moving back to their full-time street scenes post.

The Parks and Street Scenes supervisors will have to ensure the individual's training is up to date.

10. Equality and Diversity Implications

- 10.1 Equality Impact Assessments were undertaken for 8 of the toilets that we placed onto a long list (see Appendices 12 to 19). The long list was created to ensure we could hit our savings target but to also ensure the impact on residents in protected groups is minimised, as those chosen have low footfall and/or have nearby alternatives.

- 10.2 The 8 assessments all concluded that while the facilities have existed for many years, and closures would directly affect all regular and potential users, its potential additional negative impact on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

11. Climate Change/Sustainability Implications

- 11.1 The reduction in 1 vehicle will reduce the Council's diesel fuel use by 2,000 litres per year. Diesel releases around 2.6kg of carbon dioxide per litre used. Therefore, there will be a reduction of 5,200kg of carbon dioxide produced by our toilet cleaning operations.

- 11.2 The reduction in the number of public conveniences we provide will reduce the amount of electricity and water consumed by the Council's estate. This will become measurable after closures have taken place and the end of the COVID pandemic sees resident and visitor numbers return to normal.

12. Service Delivery Executive Advisory Board comments

- 12.1 Look for involvement from Parish Councils, or the private sector, in running the current facilities as an alternative to closure.

Responses to discussions are seen in section 4 and associated appendices. Discussions which will continue.

- 12.2 Concern of anti-social knock on but feel it is not a significant issue.

- 12.3 Provide an alternative mix, alongside the current officer's recommendation, of toilets for closure.

This is not possible at this stage, due to the locations being determined after reviewing the responses to an upcoming public consultation.

- 12.4 Further information regarding impact from Parish Councils and Guildford Access Group was requested.

Ripley and Shere Parish Councils have reconfirmed their position since the Service Delivery Executive Advisory Board. Ash, Ripley and Shere Parish Councils have included costings across their responses. Additionally, Cllr David Beaman is speaking at this meeting, as Chair of the South West Surrey Disability Empowerment Network and member of the Guildford Access Group.

- 12.5 An alternative 24-hour location if Bedford Road toilets are to close.

The out of hours use of Bedford Road is very low, so a 24-hour provision may not be needed. It is acknowledged that if a need for 24-hour toilets is later identified then there is possibility of making a remaining provision open all hours. This is not something that can be currently planned for as it would be subject to future budget constraints and decision making, should a need be identified.

13. Summary of Options

- 13.1 The supported project mandate laid out 6 options for consideration.

Option 1 – complete closure of services

Deliver £200,000 of savings and future refurbishment costs. However, the process would need extensive consultation and result in other challenging issues. Due to the loss of scale it would make the provision of service to the remaining 'paid for' toilets challenging.

Option 2 – part closure of facilities

Close a smaller number of facilities, compared to option 1, where at least 6 would need to close in order to suitably reduce the overall workload for 1 toilet cleaner post to be removed.

Option 3 – removal of grant funding

Removal of the grants we pay to Ash and Shere Parish Councils for their toilets. This option would create pressure on the Parish budgets which may lead to closure.

Option 4 – mixed approach

Limited closures aligned with a redistribution of work. Future Guildford has realigned car park cleaning into a wider town centre public realm team. This scale would allow for toilets in the town centre to be cleaned by the town centre team allowing for saving of 1 toilet cleaner post with the closure of only 4 toilets.

Option 5 – do nothing

This would result in the current provision continuing as it is and avoid the costs associated with the original mandate.

Option 6 – charge for some of the services
This was previously considered and ruled out.

- 13.2 The Service Delivery EAB supported this mandate on 1 April 2021 and while there was some support for option 5, which would result in current provision unchanged, it was recognised that this was unrealistic for a discretionary service given the Council's current financial position. Accordingly, it was agreed that options 3 and 4 should be pursued.

14. Conclusion

- 14.1 Although a reduction in public convenience provision is not ideal, the Council faces financial challenges which must be addressed. The Council has no legal duty to provide public toilets and Waverley Borough Council chose to close most of their provisions in past years, although some remain due to other organisations taking them over.
- 14.2 A long list of 8 toilets at risk of closure was created, and we ensured relevant stakeholders were consulted throughout. An officer's recommendation was produced, as a preferred option at public consultation. The exact locations of closures will be determined by reviewing the responses to the public consultation.
- 14.3 The recommended option of closures and removal of grant funding would achieve a £65,000 savings target, while still maintaining high quality standards alongside a good level of provision. These closures allow us to still retain our economies of scale.
- 14.4 There are a number of alternative provisions nearby to the majority of those at risk of closure, and officers will work to increase the publicly accessible provision via The British Toilet Association's "Use Our Loos" scheme and The Great British Toilet Map.

15. Background Papers

List of public toilets taken from www.guildford.gov.uk/publictoilets

16. Appendices

Appendix 1: Results of the Budget Survey 2021, prepared by SMSR Research

Appendix 2: Public Conveniences Report Service Delivery EAB 04.11.21

Appendix 3: Healthmatic Public Toilet Survey User Count 2018

Appendix 4: Ash Parish Council's response – Ash PC 02.11.21

Appendix 5: Ash Parish Council's cost breakdown – Ash PC Cost Breakdown
16.12.21

Appendix 6: Ripley Parish Council's response – Ripley PC 03.12.21

Appendix 7: Shere Parish Council's response – Shere PC 20.09.21

- Appendix 8: Shere Parish Council's second response – Shere PC 09.12.21
- Appendix 9: Onslow Village Tennis Club's response – Onslow Village Tennis Club 24.11.21
- Appendix 10: Experience Guildford's responses – Experience Guildford 31.08.21 & 12.11.21
- Appendix 11: Cllr David Beaman as Chair of the South West Surrey Disability Empowerment Network's response – Cllr David Beaman 11.09.21
- Appendix 12: Equality Impact Assessment - EIA Allen House
- Appendix 13: Equality Impact Assessment - EIA Bedford Road
- Appendix 14: Equality Impact Assessment - EIA Farnham Road
- Appendix 15: Equality Impact Assessment - EIA Onslow Recreation Ground
- Appendix 16: Equality Impact Assessment – EIA Ripley
- Appendix 17: Equality Impact Assessment - EIA Tunsgate
- Appendix 18: Equality Impact Assessment - EIA Ward Street
- Appendix 19: Equality Impact Assessment - EIA Woodbridge Road

Appendix 1 – Results of the Budget Survey 2021, prepared by SMSR Research.

Service	Importance	Priority	Spending	OVR
Services to the elderly and vulnerable	1	1	1	1
Environmental services	2	3	2	2
Public health and safety	3	2	3	3
Economic development, business, jobs, and unemployment	4	4	5	4
Housing services	5	5	4	5
Services for young people	6	6	6	6
Parks and open spaces	7	7	7	7
Leisure centres and physical activities	8	8	8	8
Public facilities	9	9	9	9
Transport and parking	10	10	10	10
Arts and heritage	11	11	11	11
Tourism services	12	12	12	12

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Service Delivery EAB

Public Conveniences Review

Thursday 4th November

Stuart Riddle – Project Lead

1. Outline

The review seeks to explore options 3 and 4 from the approved mandate. This includes the potential removal of grant funding paid to 2 Parish Councils, and a limited number of Guildford Borough Council owned toilets closing or being passed to other organisations. We aim to achieve a revenue savings target of £65k per annum and reduce future capital investments on refurbishments.

The Budget Survey 2021, undertaken by SMSR Research, asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services we provide.

The Council has no legal duty to provide public conveniences.

2. Costings

Salaries and on costs	£92k
Overtime	£22k
Operating costs (utilities/consumable)	£35k
Transport	£18k
Maintenance	£19k
Grants	£14k
Overheads	£47k
Business Rates	£8k
Depreciation	£54k
Income	(£16k)
Total Budget	£293k

The £65k savings target will largely come from making one of the toilet cleaner roles redundant. Although one of the toilet cleaner roles will no longer exist, we hope to redeploy the individual into a new role, avoiding redundancy costs.

In order to suitably reduce the current toilet cleaning workload, it is viewed that 4 or 5 facilities will need to be closed, or be passed to another organisation. We can then achieve smaller workload savings by moving the cleaning of all the town centre car park toilets to the Town Centre Team. However, this may just move a budget cost to a different team.

Assuming the highest cost 4 facilities, of those 8 listed below for consideration, we would achieve expenditure savings of £51k.

3. Grant Funding – Ash & Shere

We currently issue grants totalling £14k to Ash and Shere Parish Council's for their toilets. It is acknowledged that removing this funding would result in pressures on their own finances. However, Parish Councils can raise increased funds via their precept, comparatively to other tiers of local Government, due to no referendum principles for all Parish and Town Councils.

The saving target of £65k cannot be met without removing the £14k grant funding paid to these two Parish Councils.

4. Sites to Consider – alphabetical

Site	Reasons	Issues
Allen House	<ul style="list-style-type: none"> • Can be reused as storage. • Frequent ASB. Cleaners find needles and blood. • Low use compared to other toilets (12th out of 15). • Shopper car park so majority of users will be going to hospitality or shops that have plenty of private provision. • One of the few we have to pay Business Rates for - £1.75k 	<ul style="list-style-type: none"> • Alternative usage is limited, no commercial opportunity. • Closure could move ASB to the grounds or elsewhere in the car park.
Bedford Road	<ul style="list-style-type: none"> • Neighbours the linked Friary Centre and its toilets. • Frequent ASB. Cleaners find needles. • Shopper car park so majority of users will be going to hospitality or shops that have plenty of private provision. • Medium use compared to other toilets (9th out of 15). 	<ul style="list-style-type: none"> • The only 24-hour toilet in the Borough. • Alternative usage is limited, no commercial opportunity but can be used for storage by Parking.
Farnham Road	<ul style="list-style-type: none"> • Second lowest footfall of all out toilets (14th out of 15). • 'Tired and dated' with no baby changing facilities. • Long stay car park but used primarily for commuters. Commuters will either be working nearby in Guildford or going to the train station. • The largest spend on utilities - £2.6k 	<ul style="list-style-type: none"> • Alternative usage is limited, no commercial opportunity but can be used for storage.
Onslow Recreation Ground	<ul style="list-style-type: none"> • Low footfall (13th out of 15) and least popular Parks toilet. • Poorer condition compared to other Council offerings. • One of the few facilities without disabled or child changing provisions. • Potential for tennis club to take over the toilet. 	<ul style="list-style-type: none"> • Users of the park and play area may have no other alternative.

Ripley	<ul style="list-style-type: none"> • If Ripley remains open then 5 toilets will be needed, otherwise only 4 may be needed. • Stops small grant funding for the Parish Council to open and close toilets. • Lowest footfall of all our toilets (15th out of 15). • 4th highest budget cost of all toilets - £6.3k 	<ul style="list-style-type: none"> • Important asset for Ripley Parish during events but this makes it likely they could take it over. • Small building with no real alternative use being viable.
Tunsgate	<ul style="list-style-type: none"> • Difficult to clean without a strict rota due to Tunsgate barrier and High Street closing to vehicles. • Due to location there are many other locations via private provision. • High possibility Experience Guildford could take it over. • One of the few we have to pay Business Rates for - £1.7k • 3rd highest budget cost of those on this list - £5.9k 	<ul style="list-style-type: none"> • Used by High Street market traders. • Highest footfall (1st out of 15) due to location. • Limited commercial opportunity due to its small size. • Closest public alternative is Ward Street. Not feasible to close both.
Ward Street	<ul style="list-style-type: none"> • Strong chance of commercial use generating an income. • Surrey CC are looking to include toilets in nearby library. • Of the few that require Business Rates payable it is the most expensive - £3.2k. • The highest depreciation rate at £15k. 	<ul style="list-style-type: none"> • Recently installed a water fountain. • Used by North Street market traders. • High footfall (3rd out of 15). • Closest public alternative is Tunsgate. Not feasible to close both. • Recent refurbishment and one of the highest quality toilets we provide.
Woodbridge Road	<ul style="list-style-type: none"> • Heavily used by customers of the café. • Potential for cricket club or café to take over toilets. • 4th highest budget spend of those on this list - £5.5k • Large use by commuters walking to Guildford train station, which provides public toilets. 	<ul style="list-style-type: none"> • High footfall (5th out of 15). • Heavily used by customers of the café. • Recently installed a water fountain.

5. Officer Recommendation

To achieve the needed expenditure savings I recommend that, as part of the consultation, we set out a preference for –

- 1) Allen House, Bedford Road, Ripley and Woodbridge Road to be closed, or passed to another organisation. These 4 locations will allow us to reduce the total workload suitably to make one of the toilet cleaner roles redundant.
- 2) The removal of grant funding from Ash and Shere Parish Councils.

6. Sites not Suggested

Site	Reasons
Burchatt's Farm	<ul style="list-style-type: none"> • Close to Stoke Park's sports facilities. • Close to the larger parking area in Stoke Park. • Home Farm has already been approved for closure. • We believe this is used by a lot of taxi drivers. • Provision supports Green Flag award.
GLive	<ul style="list-style-type: none"> • Standalone purpose-built modern toilets with no alternative usage opportunities. • One of the highest quality conveniences we provide. • Shopper car park but further away.
Guildford College & Stoke Park Playground	<ul style="list-style-type: none"> • 2nd highest use toilets in the Borough. More impressive as the facility is not in a town centre high street location. • Next to the playground, mini golf, tennis courts and paddling pool. • No nearby alternative for young children and disabled residents. • Provision supports Green Flag award.
Pop-up Urinal (North Street)	<ul style="list-style-type: none"> • Provision supports night-time economy and Purple Flag award. • Reduced public urination at night – reduces ASB and cleaning pressure on other Street Scene operations. • One of the most unique provisions in Surrey. The installation made national news.
Shalford Park	<ul style="list-style-type: none"> • Used as a long stay car park for commuters in the week. The station has no toilet facilities. • Large facility adjacent to changing rooms for sports in the park. • Remote location so commercial opportunities not easily viable. • No nearby alternatives.
Stoughton Cemetery	<ul style="list-style-type: none"> • Receive an income to clean these toilets. Removing this location would have to be approved by third parties and would remove the scale of our operations.
Sutherland Memorial Park	<ul style="list-style-type: none"> • Used by residents using the playground and playing fields. • Nearby large parking facilities. • No nearby alternative and no real alternative use.
The Mount Cemetery	<ul style="list-style-type: none"> • Receive an income to clean these toilets. Removing this location would have to be approved by third parties and would remove the scale of our operations.

7. Risks

There will likely be extensive negative feedback from all external stakeholders. There is also some potential for any agreed closures to affect our future bidding to retain our Green Flag and Purple Flag awards.

Any closures could have a negative impact on the number visitors to the Borough in a post COVID world. This made equalities impact very important but does not rule out closures needed for our savings target. As always, we need to ensure the correct balance between the benefit of cost savings and the negative impact on, or perception with, residents.

8. Equality Impact Assessments

We have undertaken equality impact assessments for the 8 public conveniences on the “sites to consider” list found on point 4. As these toilets are the ones we will be going to consultation with, alongside the officer’s recommendation as the preference, we need to ensure any action Guildford Borough Council takes does not discriminate against any resident or visitor that may fall into a protected group as defined in The Equality Act 2010.

The 8 assessments all concluded that the facilities have existed for many years, and although closures would directly affect all regular or potential users of the public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council’s financial position.

9. External Stakeholders

At an early-stage some main stakeholders were made aware of this project and the potential implications of the review. However, it was made clear that no decision has yet been made.

Ash, Ripley and Shere Parish Councils have been contacted and made aware of this review, and the potential for facility closures and removal of grant funding. Ash has not yet responded but comments made by Ripley and Shere are attached.

Guildford Action Group noted that public toilets provide an essential service to all, with attention to those with medical conditions, the elderly and those with babies and young children. They suggested increasing car park charges, seeking funding from Parish Councils, sponsorship and charging at the high-quality toilets to raise funds needed to maintain current provision.

Experience Guildford are against the closure of town centre toilets. They note the Ward Street and Tunsgate facilities being used by market traders. Additionally, residents and visitors often choose a destination, or length of stay, based on the convenience and location of public toilets.

10. Next Steps and Milestones

- 1) Executive – Tuesday 4th January
- 2) Public Consultation – 6 weeks starting mid-January 2022
- 3) CMT – TBC in early March 2022
- 4) Following CMT in March 2022 - Place closure notice on chosen toilets, serve notice to utility providers, commence redeployment of affected staff
- 5) Project Close - Friday 1st April (last working day of financial year)

11. Appendices

Agenda item number: 5
Appendix 2

Appendix 1 – Results of the Budget Survey 2021, prepared by SMSR Research.

Service	Importance	Priority	Spending	OVR
Services to the elderly and vulnerable	1	1	1	1
Environmental services	2	3	2	2
Public health and safety	3	2	3	3
Economic development, business, jobs, and unemployment	4	4	5	4
Housing services	5	5	4	5
Services for young people	6	6	6	6
Parks and open spaces	7	7	7	7
Leisure centres and physical activities	8	8	8	8
Public facilities	9	9	9	9
Transport and parking	10	10	10	10
Arts and heritage	11	11	11	11
Tourism services	12	12	12	12

Appendix 2 – list of public toilets taken from www.guildford.gov.uk/publictoilets

Site	Baby changing facilities	Disabled toilet
Ward Street	Yes	Yes
Tunsgate	Yes	Yes
Farnham Road (car park)	No	Yes
Bedford Road (car park)	Yes	Yes
The Friary Shopping Centre*	Yes	Yes
Allen House (York Road car park)	Yes	Yes
Woodbridge Road	No	Yes
Shalford Park	Yes	Yes
Onslow Recreation Ground	No	No
Guildford College and Stoke Park Playground	Yes	Yes
Burchatts Farm	No	Yes
Sutherland Memorial Park	No	Yes
Ripley	No	Yes
Stoughton Cemetery	No	No
The Mount Cemetery	No	No
Pop-up urinal (North Street)	No	No
GLive	No	Yes
Shere*		
Ash*		

*Toilets are not looked after by Guildford Borough Council.

Agenda item number: 5
Appendix 2

Appendix 3 – Ripley Parish Council's response

From: rpc <clerk@ripleyparishcouncil.gov.uk>
Sent: 22 September 2021 13:12
To: Toilet Review <ToiletReview@guildford.gov.uk>
Subject: Re: Public Toilets Provision Review

Hi Stuart,

Thank you for offering the council the opportunity to make representations to the Public Toilets Provision Review. The council considered your correspondence at its recent meeting, and makes the following observation:

Ripley has a 68-acre Village Green which is hugely popular with visitors and provides a number of different uses including recreation, sports, play equipment for young people of different ages, and events such as the award winning Ripley farmers' Market. Footfall on The Green is always large, but during the pandemic we have seen a huge increase in visitor numbers as people sought to access open space for exercise and to meet outdoors. The loos on Ripley Green are an essential facility for visitors and the parish council would have grave concerns over environmental health should the conveniences be closed.

The council would appreciate the loos having a refurbishment in order to fix some of the issues (with hand washing equipment, for example).

Thanks again, and I'll be happy to clarify, if needed, the council's position as the Review continues.

Jim Morris
BSc (Hons), PSLCC

4 Rio House
High Street
Ripley
GU23 6AE

01483 224847
clerk@ripleyparishcouncil.gov.uk

Appendix 4 – Shere Parish Council’s response



Shere PC Response
Sept 2021.pdf

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Guildford Public Toilet User Survey

Healthmatic Ltd | Guildford Borough Council | September 2018

Contents

- User Survey Overview
 - Survey Results
- Conclusions
 - Charging?
- Survey detail by site
 - Allen House (car park)
 - Bedford Road
 - Burchett's Farm
 - Farnham Road (car park)
 - G- Live car park
 - Home Farm
 - Onslow Village Rec
 - Ripley High Street
 - Shalford Park
 - Shere
 - Tunsgate
 - Stoke Park (by tennis courts)
 - Sutherland Memorial park
 - Ward Street
 - Woodbridge Road

User Survey Overview

A user counting survey was carried out on 15 public toilet facilities in the Guildford Borough area. The site at Ash was not included as the fitting of counter equipment was not possible. DDA cubicles were not included in the survey as use is sporadic and the data does not contain any key indicators.

The survey ran from mid-June through to 30th August, allowing a survey period of over two months. A survey snapshot by site detailing daily and weekly usage of gents and ladies toilets as well as graphs detailing user peaks follows later in this document. Further detailed information such as hourly use is held on the user portal and can be accessed using the log in detail provided.

Survey Results

		Total	Average per Day
Allen House Gents		1861	25
Allen House Ladies		1594	21
	Totals	3455	47
Bedford Road Gents		1017	13
Bedford Road Ladies		4249	55
	Totals	5266	68
Burchett's Farm Gents		2816	38
Burchett's Farm Ladies		1152	15
	Totals	3968	54
Farnham Road Gents		1621	20
Farnham Road Ladies		1454	18
	Totals	3075	39
G-Live Gents		4242	57
G-Live Ladies		2387	32
	Totals	6629	90
Home Farm Gents		4124	58
Home Farm Ladies		2801	36
	Totals	6925	95
Onslow Toilets G		1133	15
Onslow Toilets L		1929	24
	Totals	3062	40
Ripley Gents		1800	24
Ripley Ladies		967	12
	Totals	2767	37
Shalford Park Gents		5476	75.
Shalford Park Ladies		2479	33
	Totals	7955	108
Shere Gents		6223	85
Shere Ladies		8334	114
	Totals	14557	199
Stoke Park Gents		9144	163
Stoke Park Ladies		12478	162

	Totals	21622	325
Sutherland Gents		2389	31
Sutherland Ladies		2131	29
	Totals	4520	60
Tunsgate Gents		11102	152
Tunsgate Ladies		14400	197
	Totals	25502	349
Ward Street Gents		10342	132
Ward Street Ladies		13749	176
	Totals	24091	308
Woodbridge Road Gents		8227	105
Woodbridge Road Ladies		3650	46
	Totals	11877	152

A quick review of the data collected reveals the busiest sites as follows:

1	Tunsgate
2	Stoke Park
3	Ward Street
4	Shere
5	Woodbridge Road
6	Shalford Park
7	Home Farm
8	G-Live
9	Bedford Road
10	Sutherland
11	Burchett's Farm
12	Allen House
13	Onslow Toilets
14	Farnham Road
15	Ripley

Key	
High	
Medium	
Low	

Conclusions

The toilets in this survey are generally well used in comparison to general public toilet use. Even the low use toilets appear to be at the top end of low usage in comparison to other surveys we have conducted across the UK.

The average cost of keeping a facility in use in the UK is approximately **£20,000 pa.** which includes rates, utilities, maintenance, cleaning and consumables. Using **Ripley** as an example, as it has the lowest use, the cost per user of this site equates to **£1.48** per user. Whereas at the opposite end of the scale the **Tunsgate** cost per user is **£0.16.**

Charging?

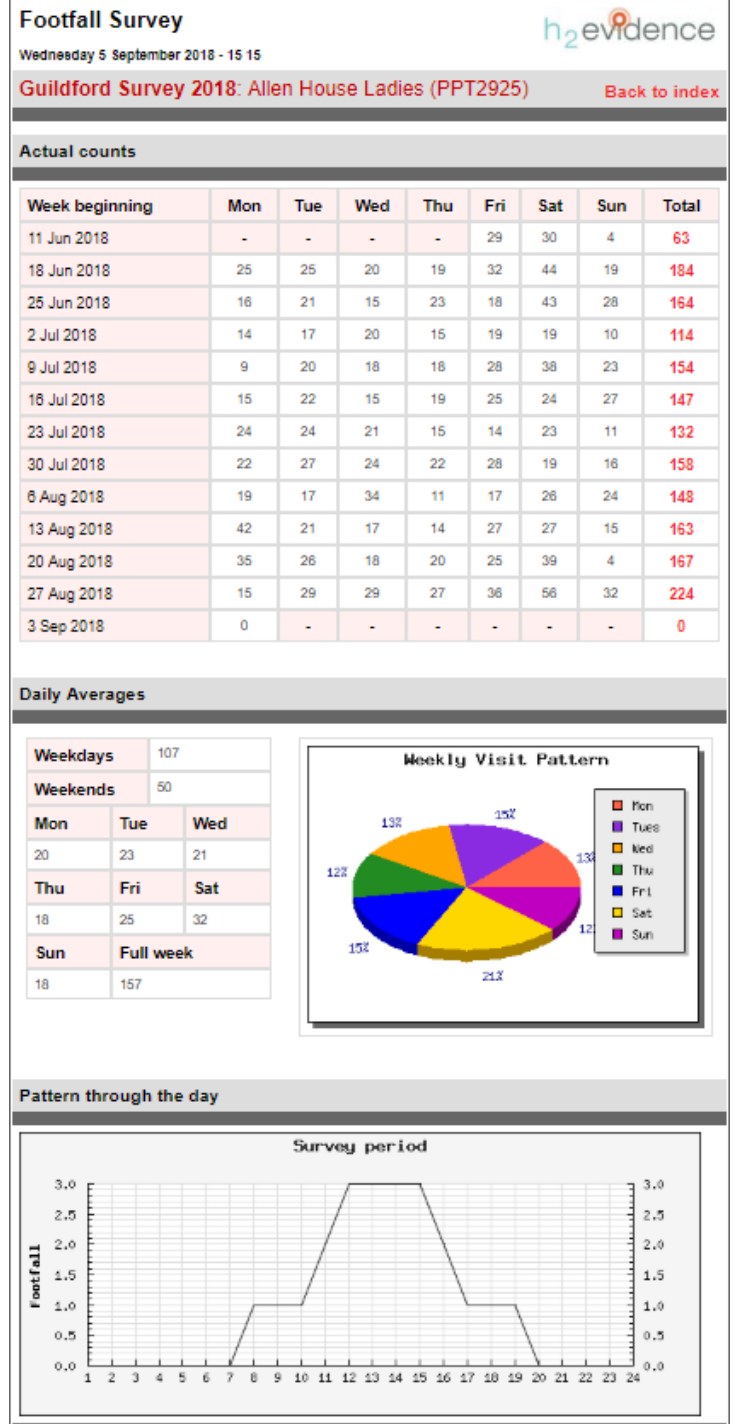
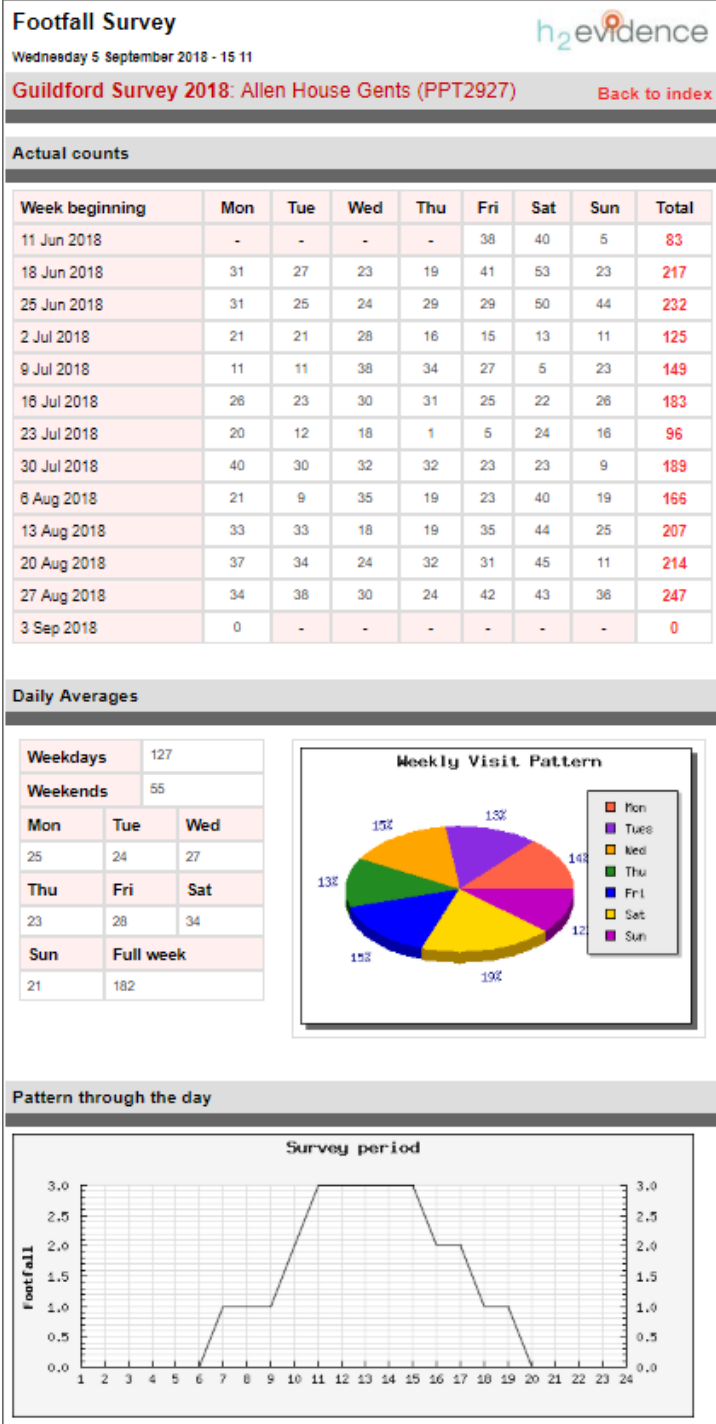
Never a popular decision but as an alternative to closure it is worth considering. Charging for public toilets will never cover the cost of operation but it may assist in easing the cost burden of operating the facility. Things to consider when considering the introduction of charging.

The introduction of a charge for toilets will:

- ‡ Reduce usage of the facility by 50%.
- ‡ Reduce the income generated
- ‡ Reduce the amount of water, electric and consumables used.
- ‡ Deter vandalism and reduce maintenance costs.
- ‡ Eliminate the need to open and close the toilets. It also allows the operator to pre-set times for opening & closing.
- ‡ Not be well received by users without improving or refurbishing the site

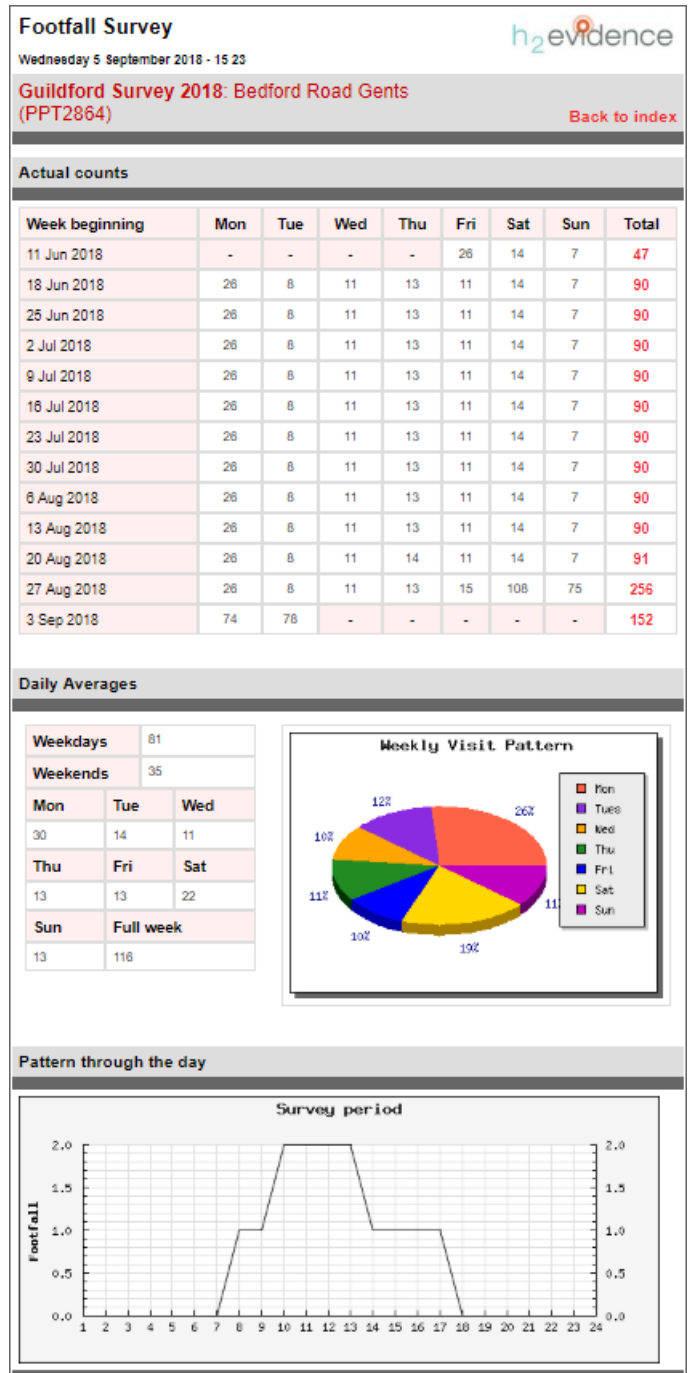
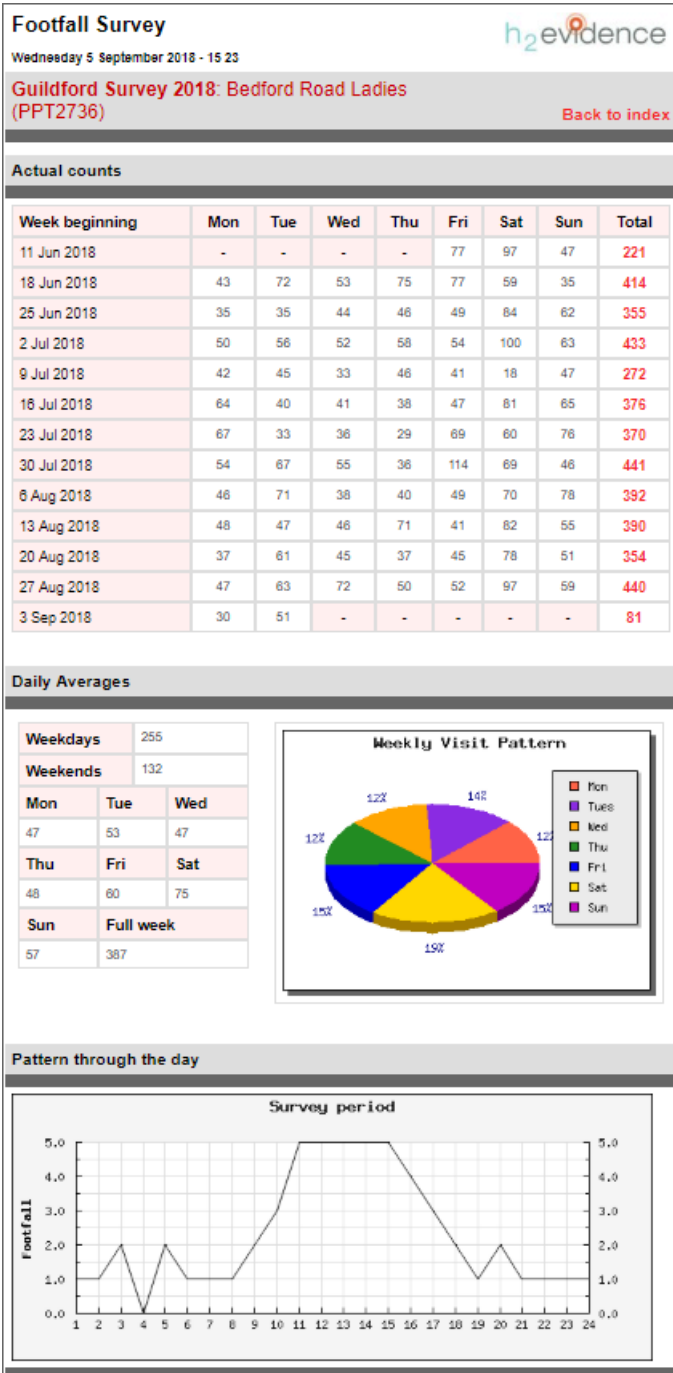
Allen House

Low usage site with a lunch time peak. Usage is consistent throughout the week.



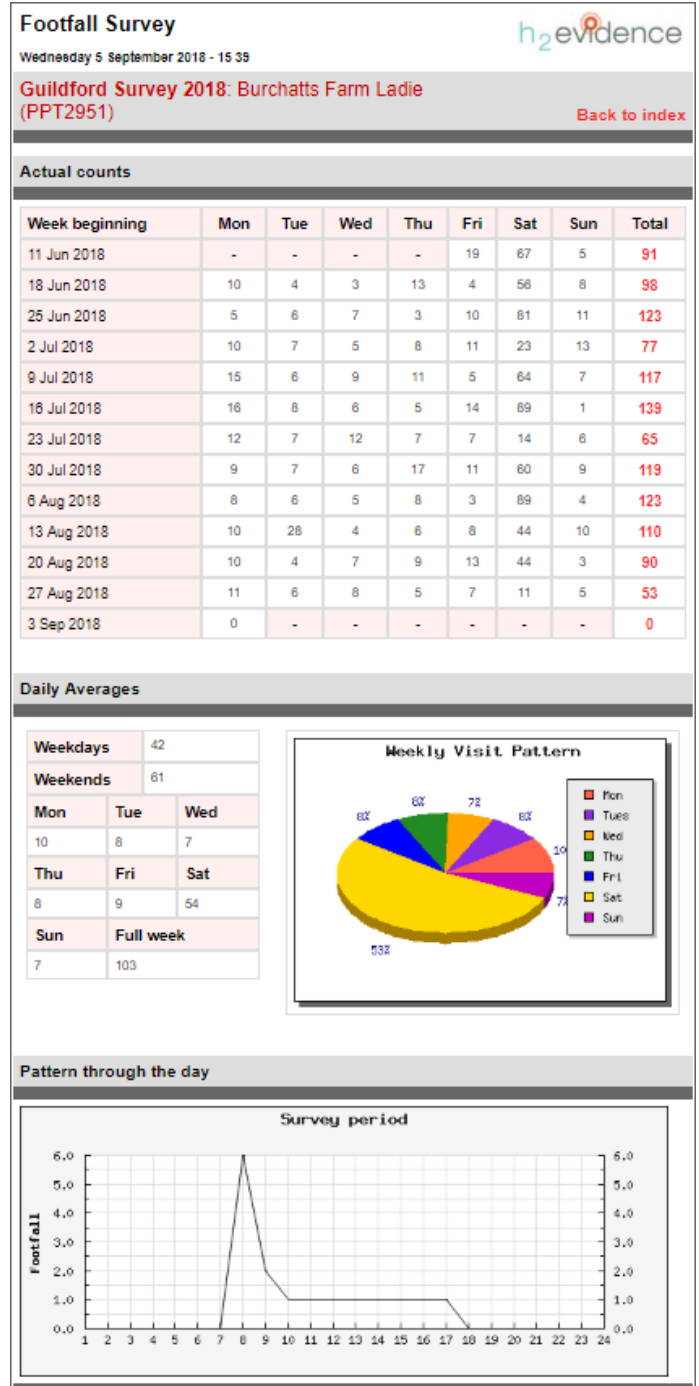
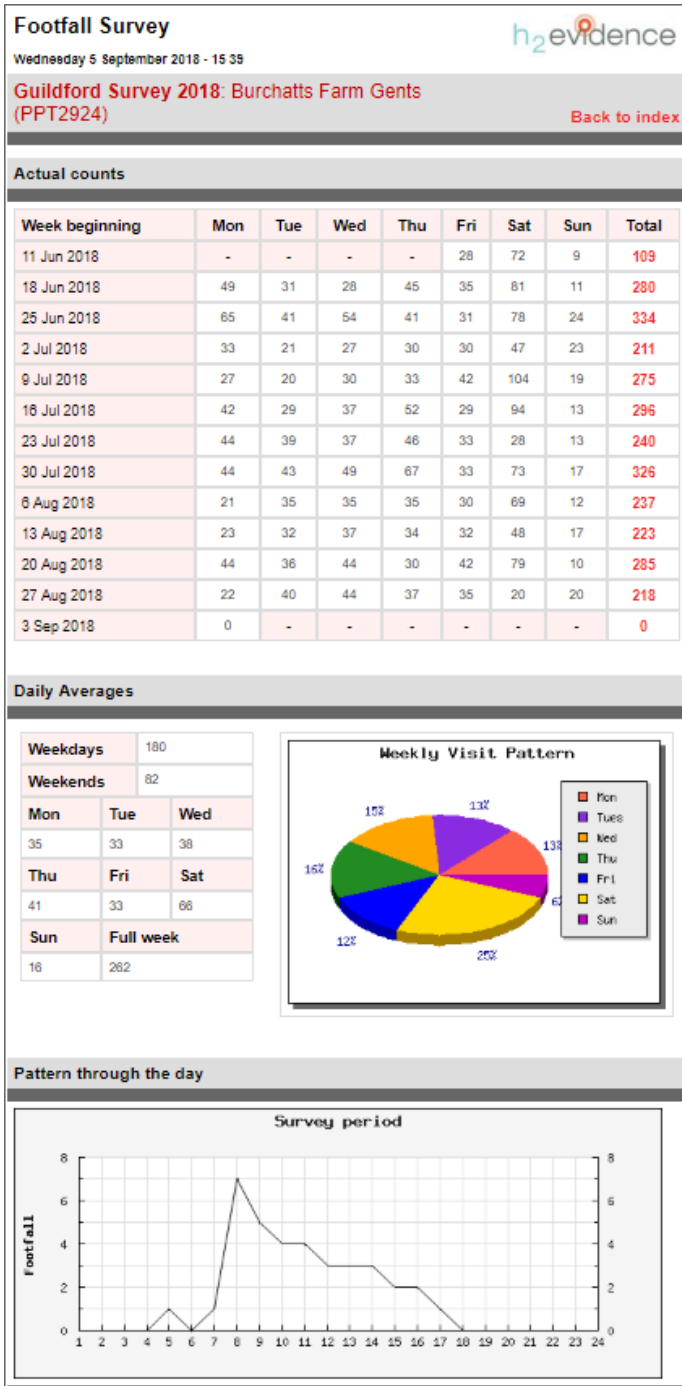
Bedford Road

Medium use site. Higher usage in the Gents by nearly 4 times compared to the Ladies. Very consistent usage of the Ladies suggests regular users with an uplift in use on Monday's?



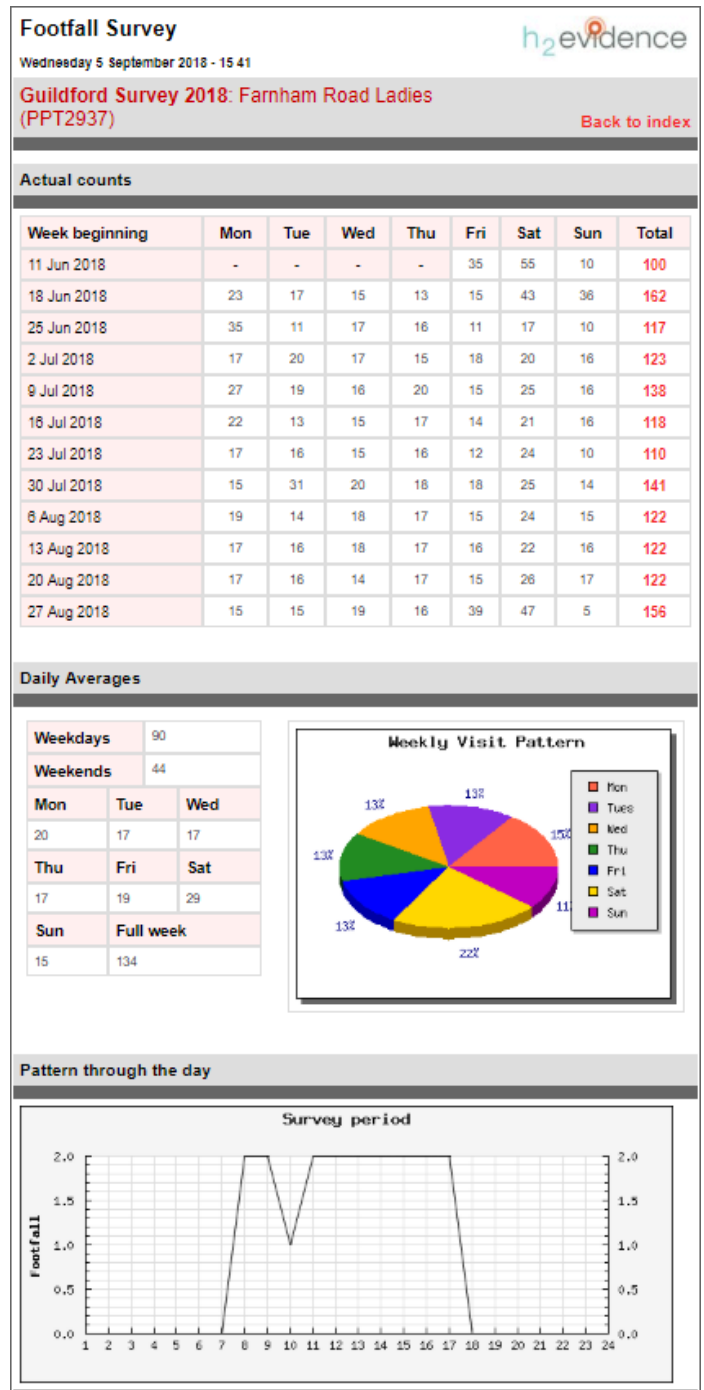
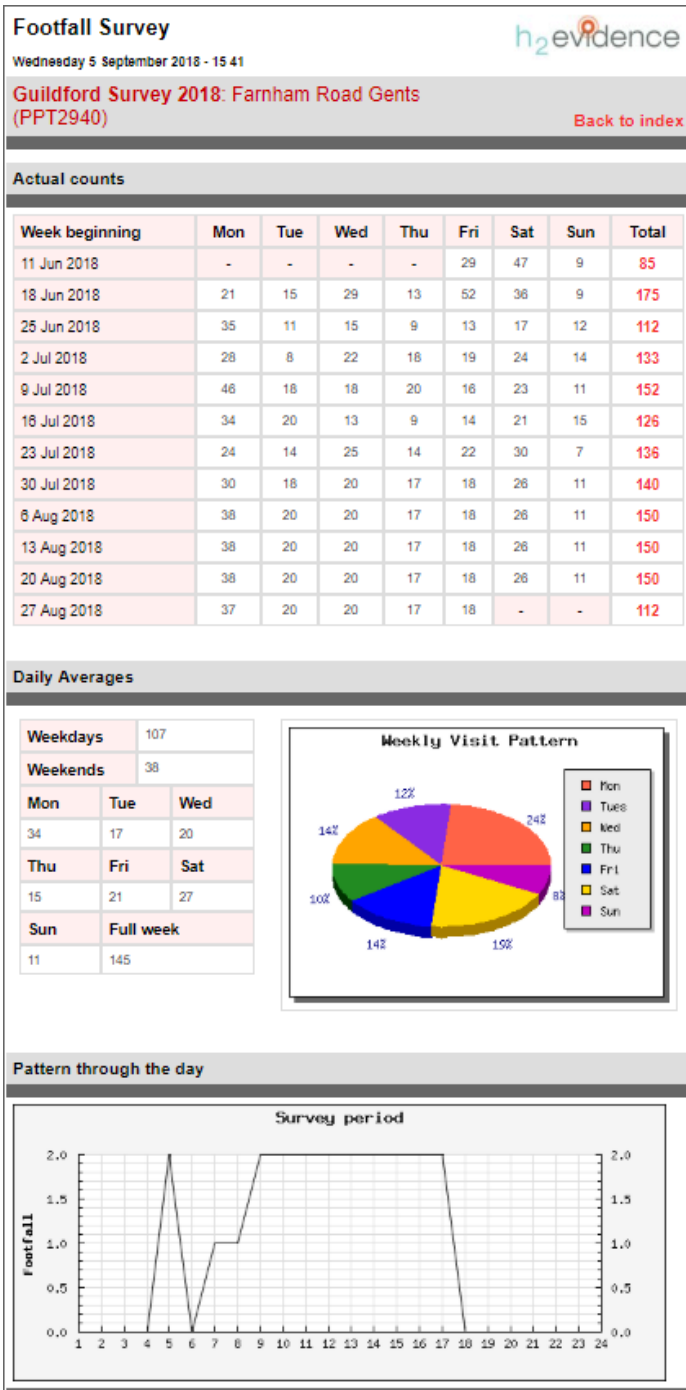
Burchett's Farm

A low use facility which peaks in the morning between 8am and 10am. Busier on a Saturday which suggests local shopping or events nearby?



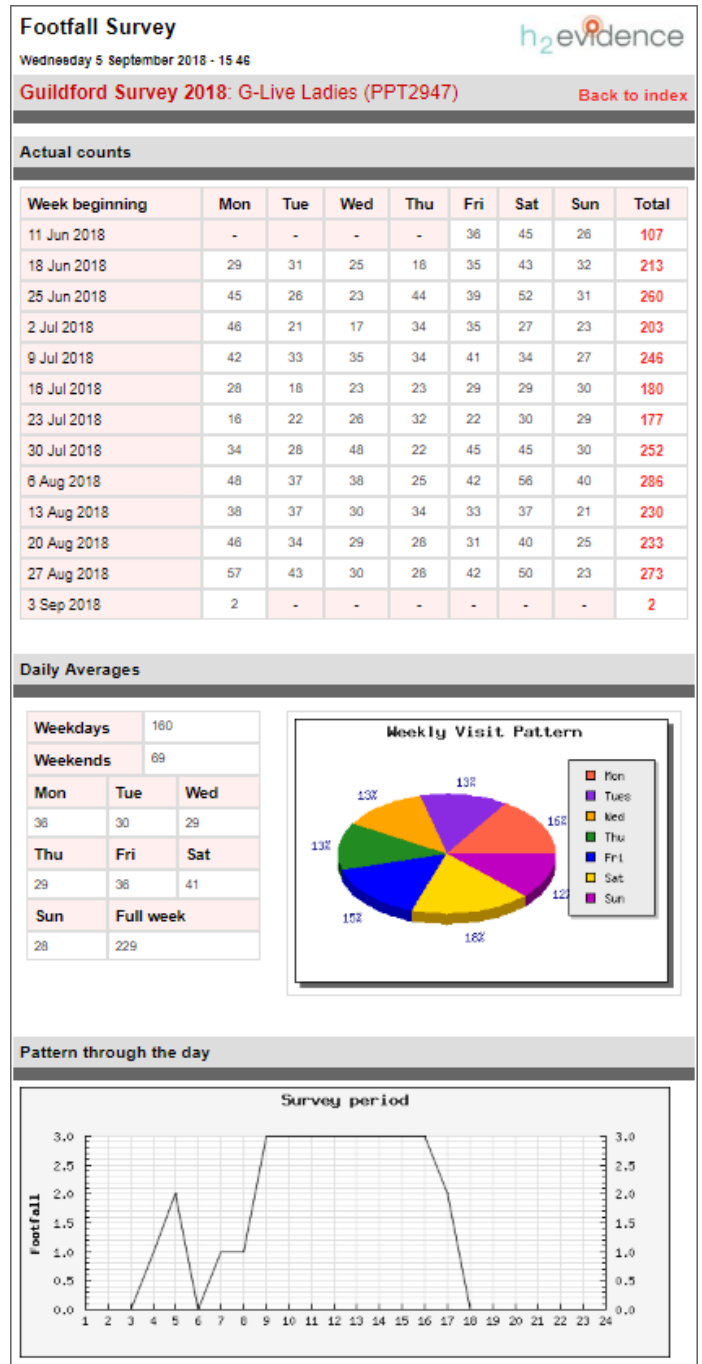
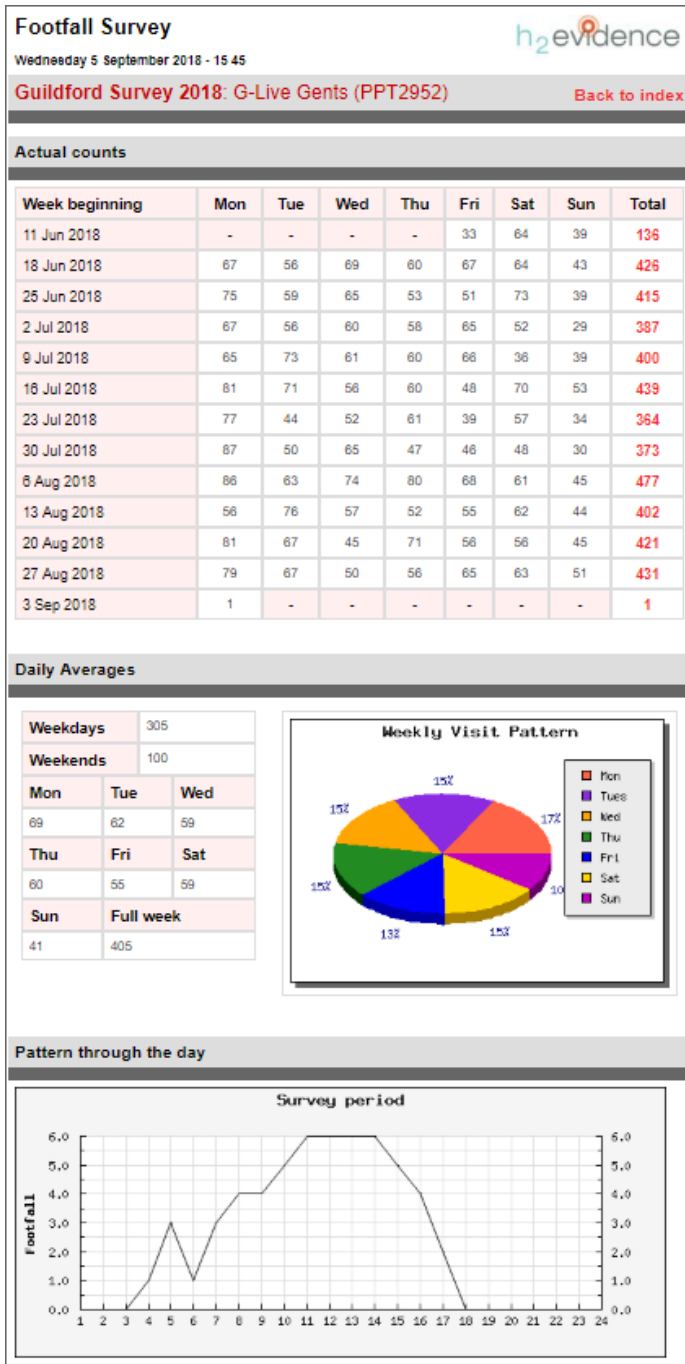
Farnham Road

A low usage site which has constant visits throughout the day. Some out of hours counts suggest the gents facility isn't always locked?



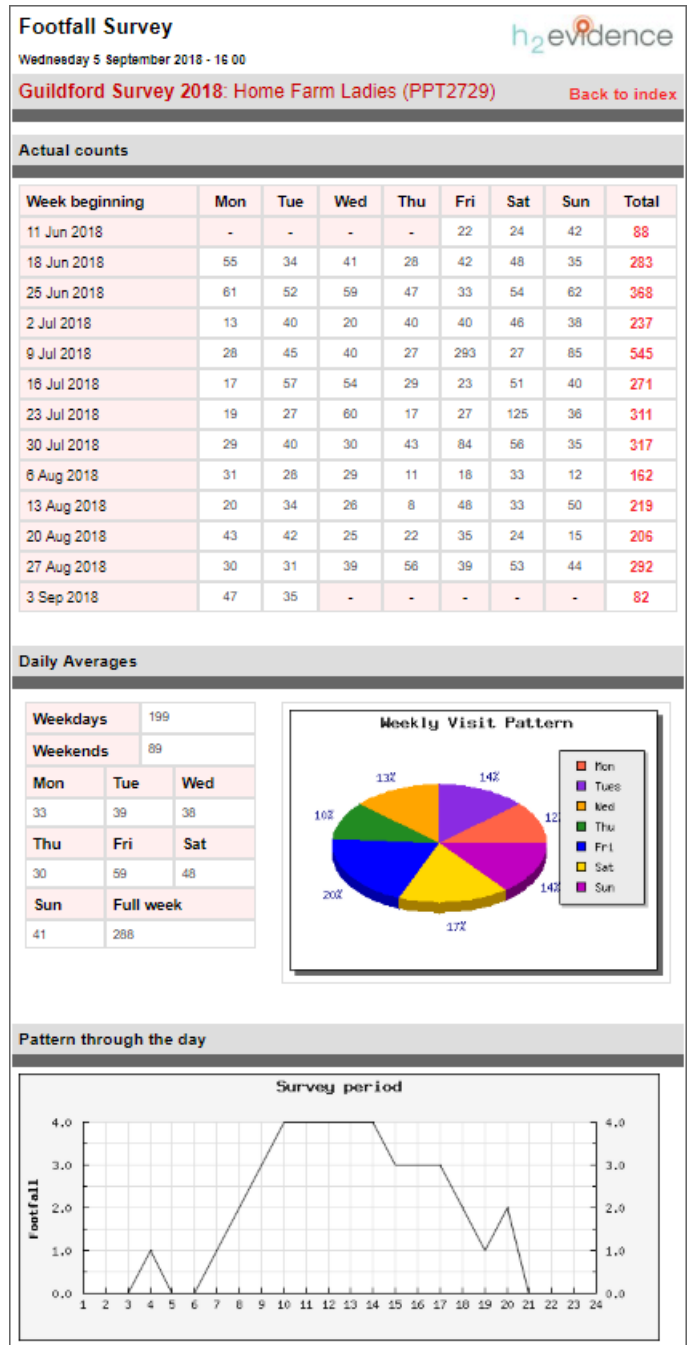
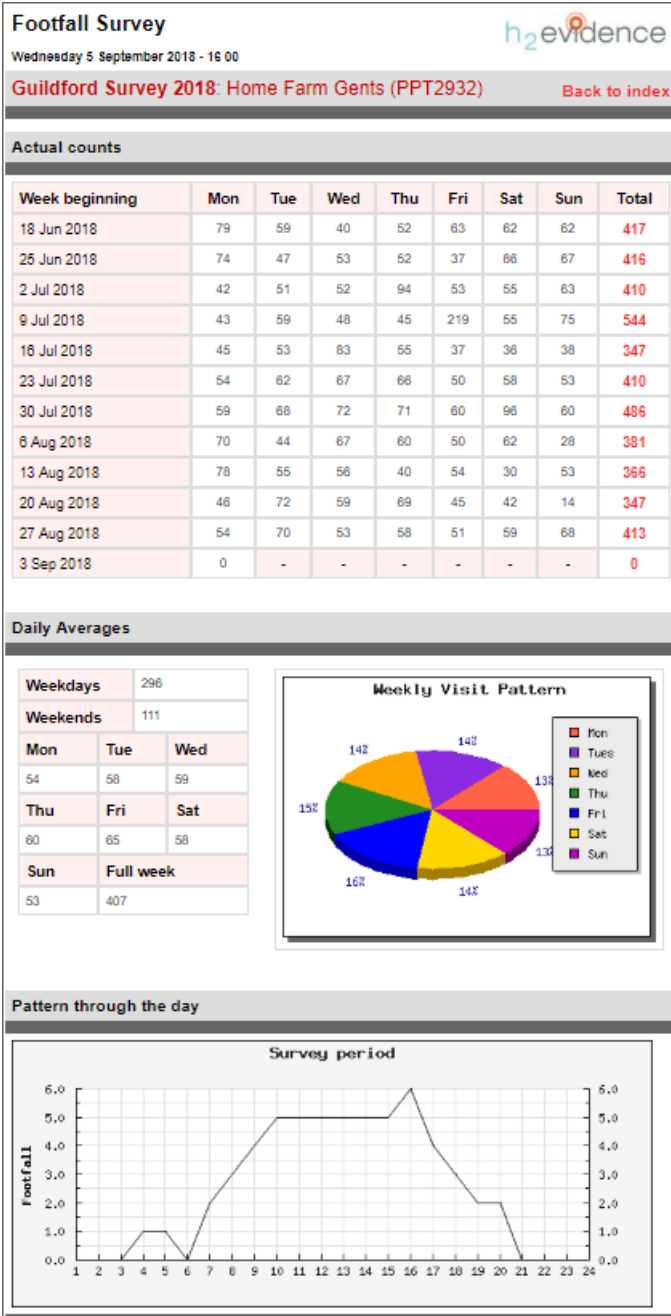
G-Live Car Park

A medium use site with constant use during the day. Some very early counts but none after 18:00 which is assumed to be the closing time.



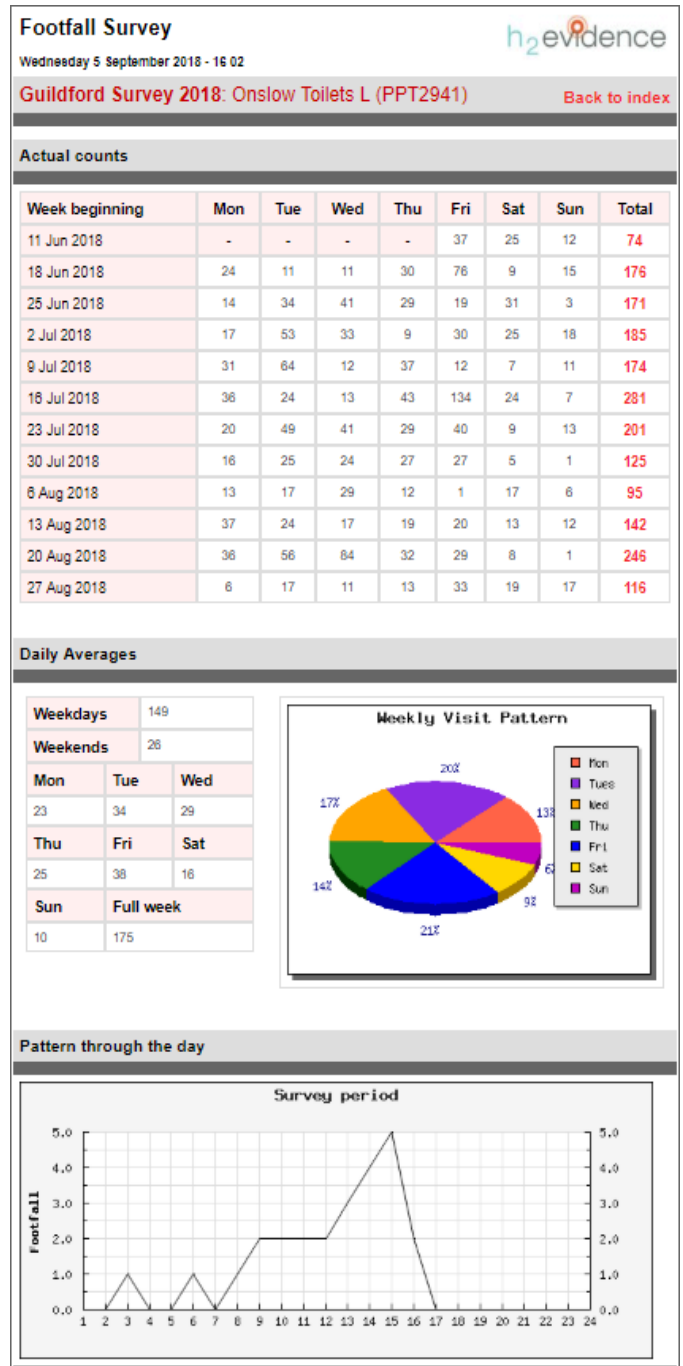
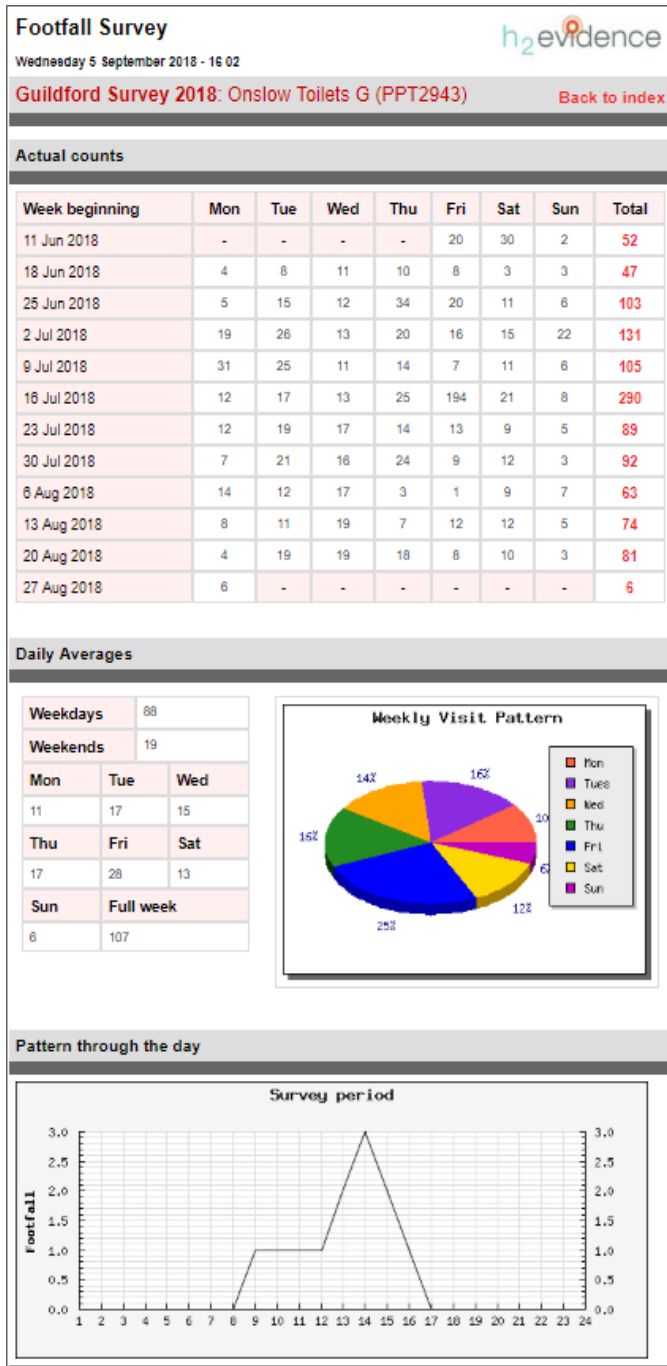
Home Farm

A medium use site with constant use throughout the day. Some early morning counts with closing time at 21:00.



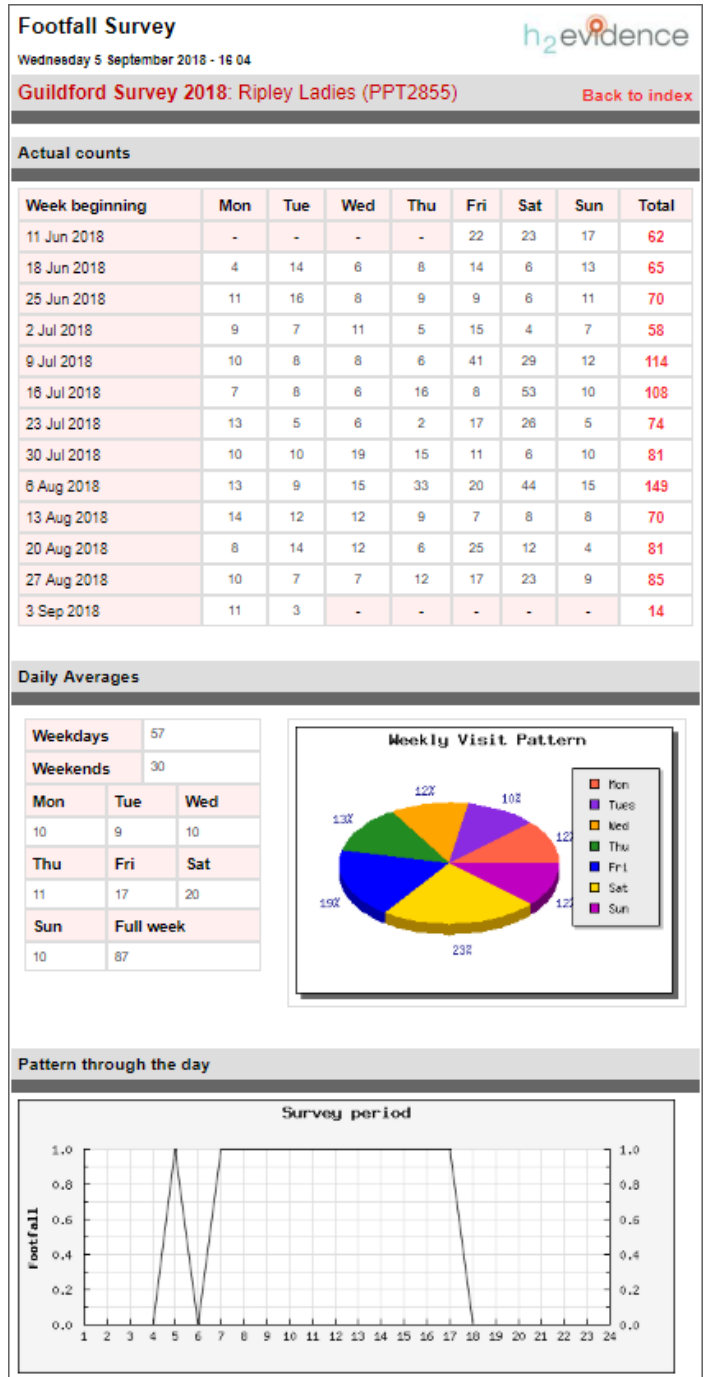
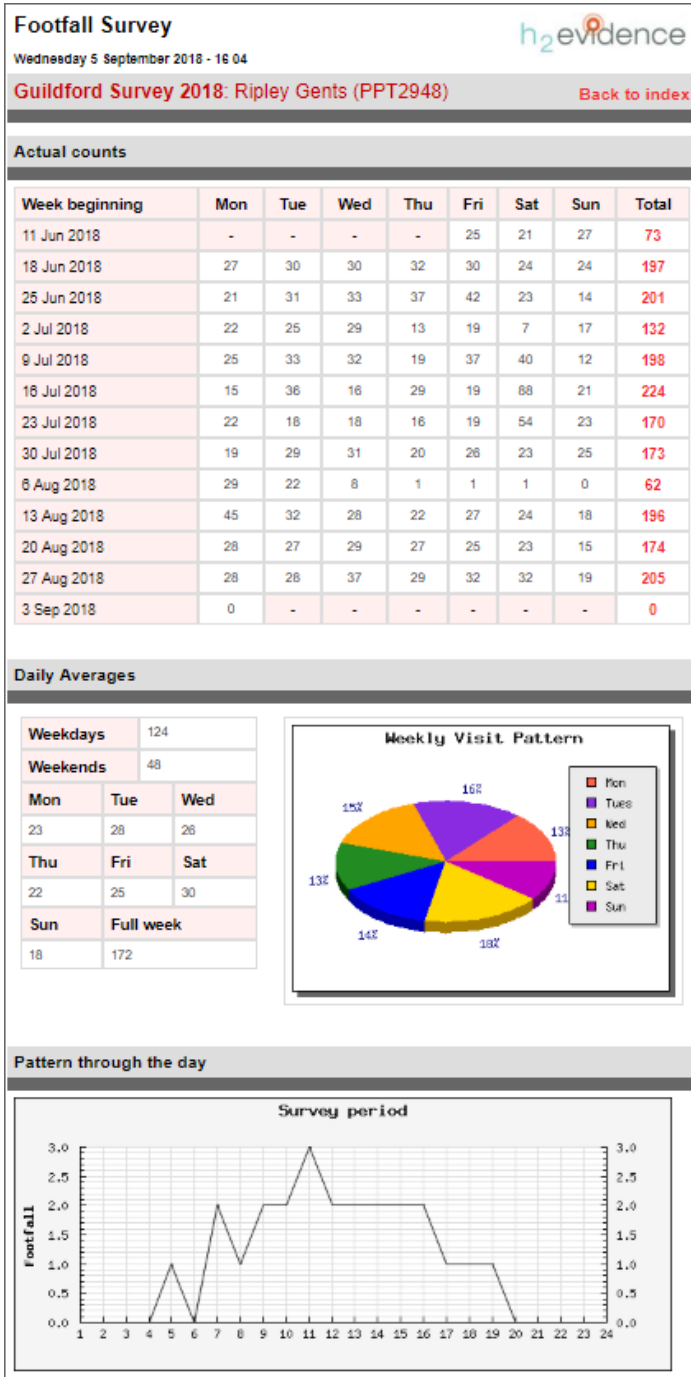
Onslow

A low use site which is busiest on a Friday. The ladies shows some overnight counts which is in contrast to the gents which operates 08:00 to 17:00



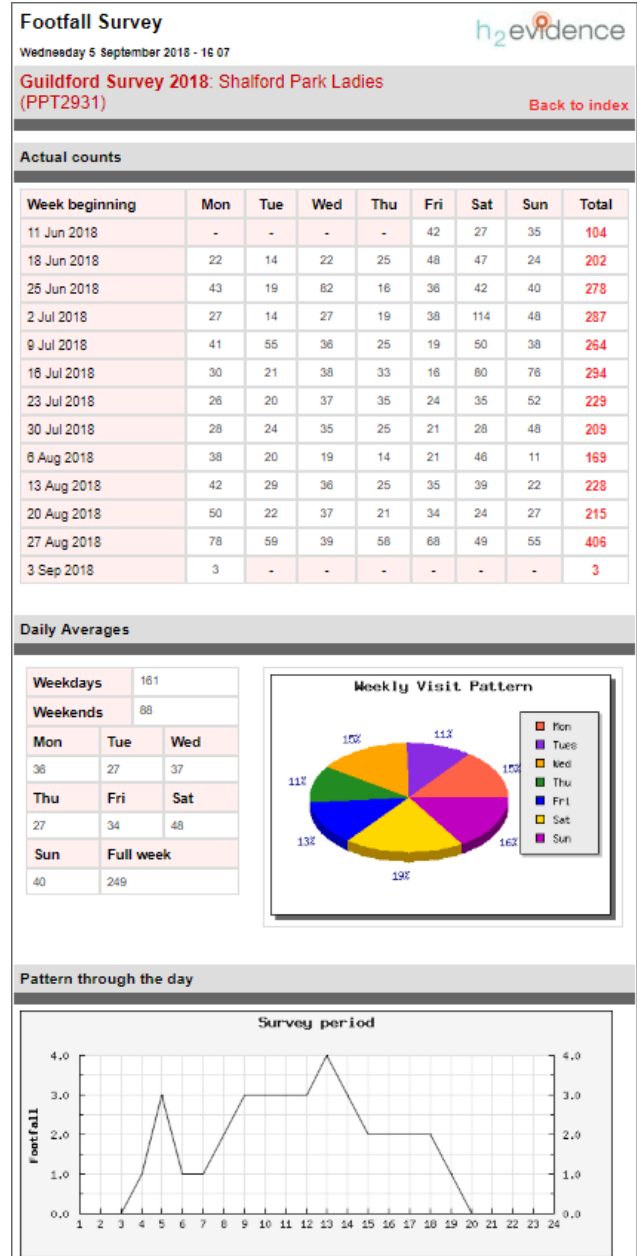
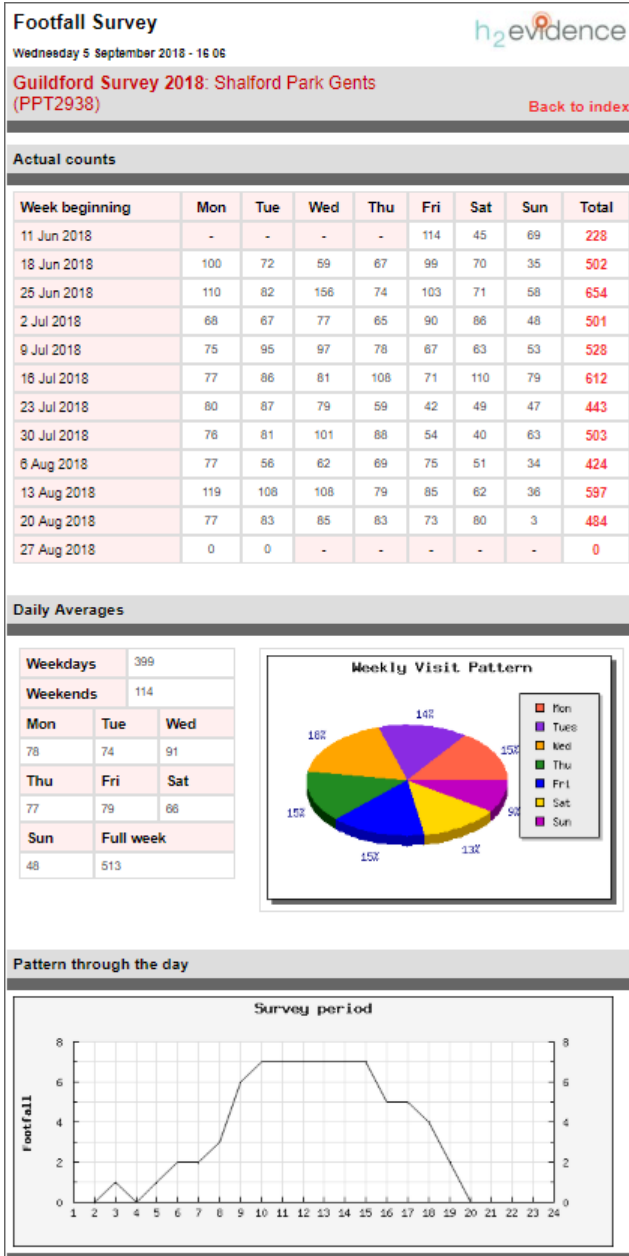
Ripley High Street

Lowest used site. Appears to be opened at 04:00.



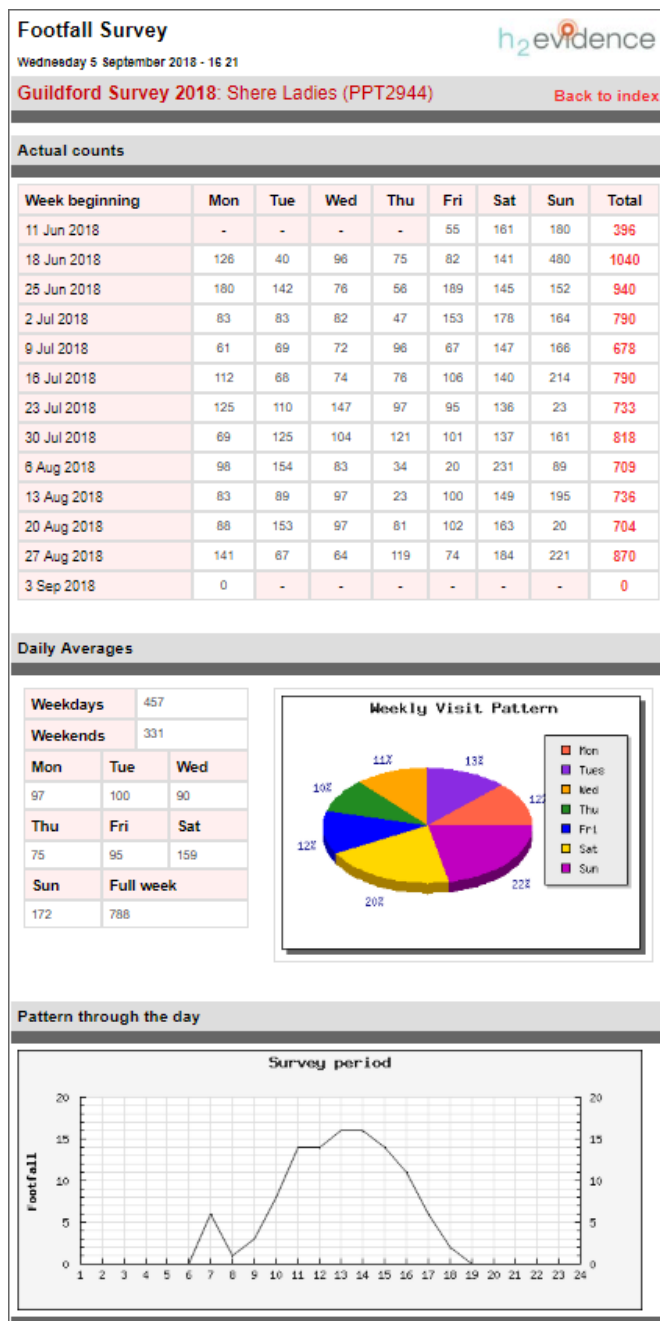
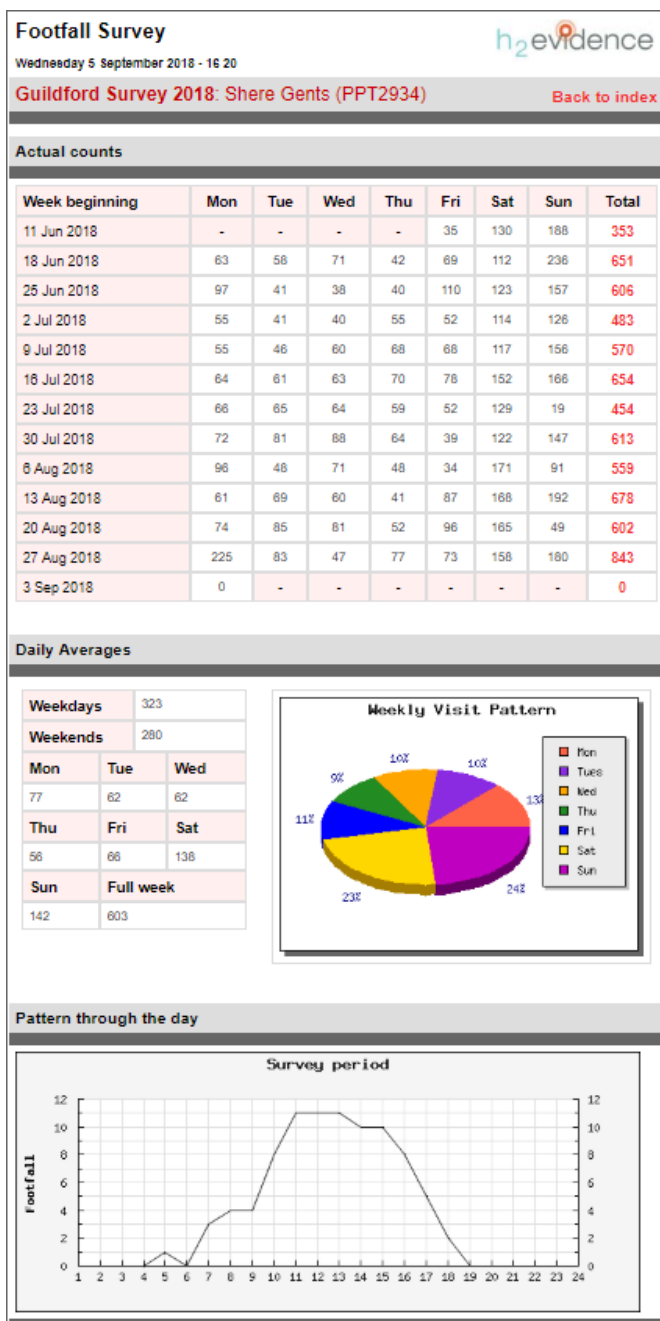
Shalford Park

A medium use site with good constant numbers. Early morning/overnight access recorded.



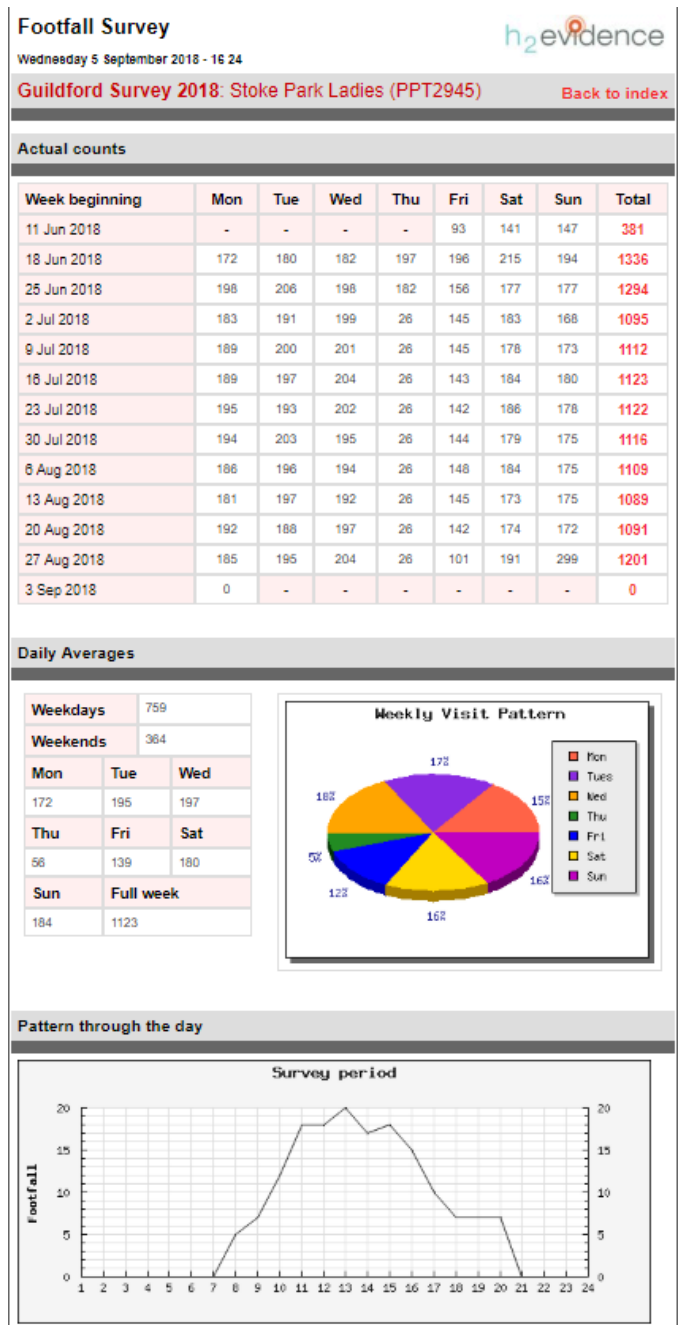
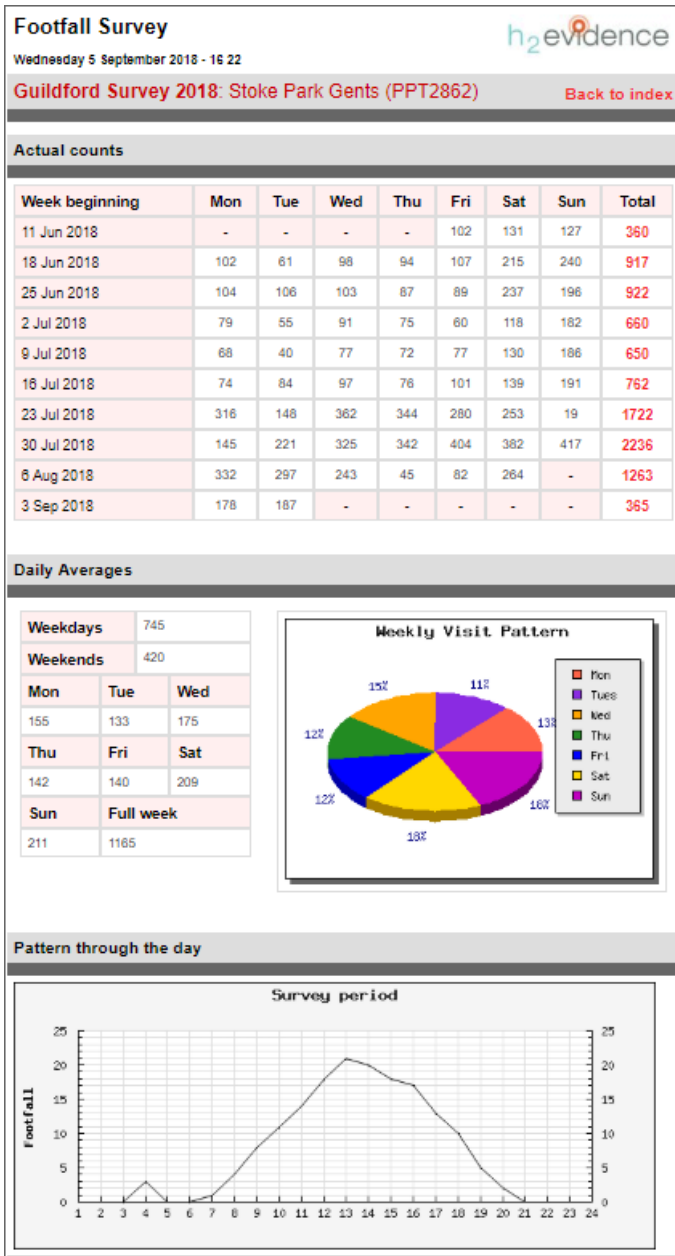
Shere

A high use site which is busiest at weekends. Usage builds towards lunchtime and stays fairly constant until 17:00



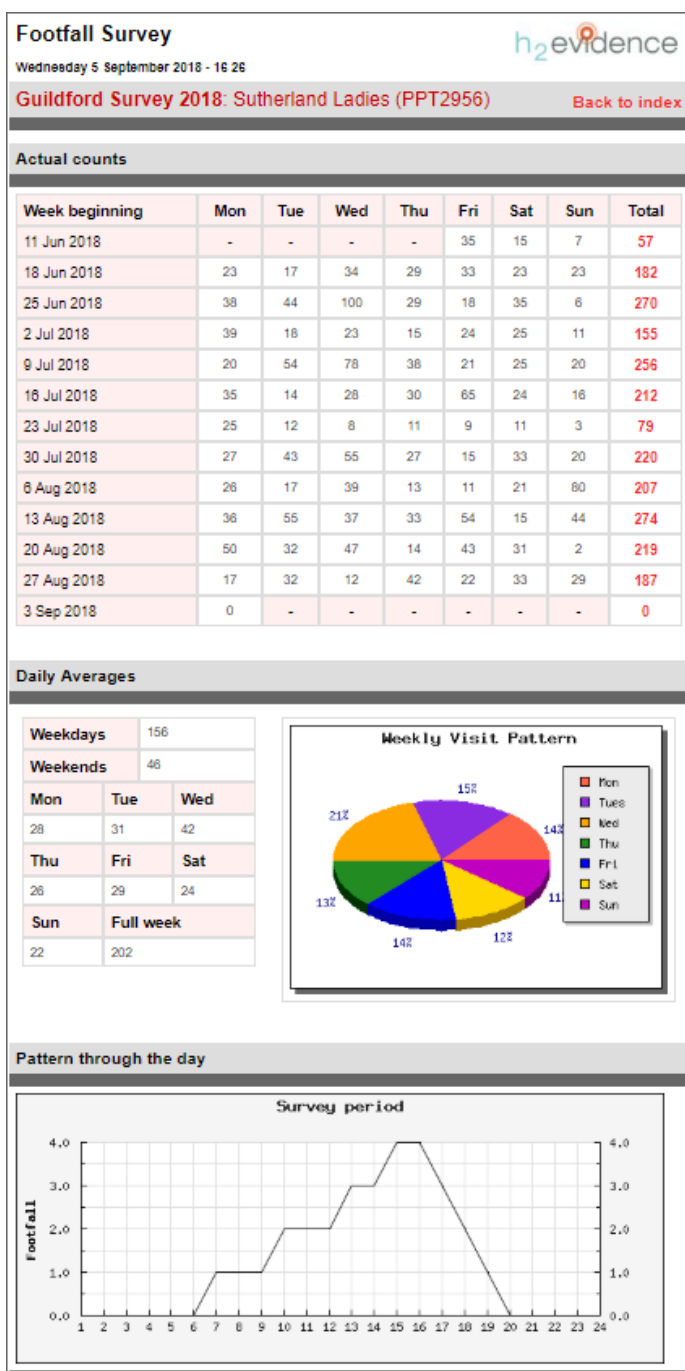
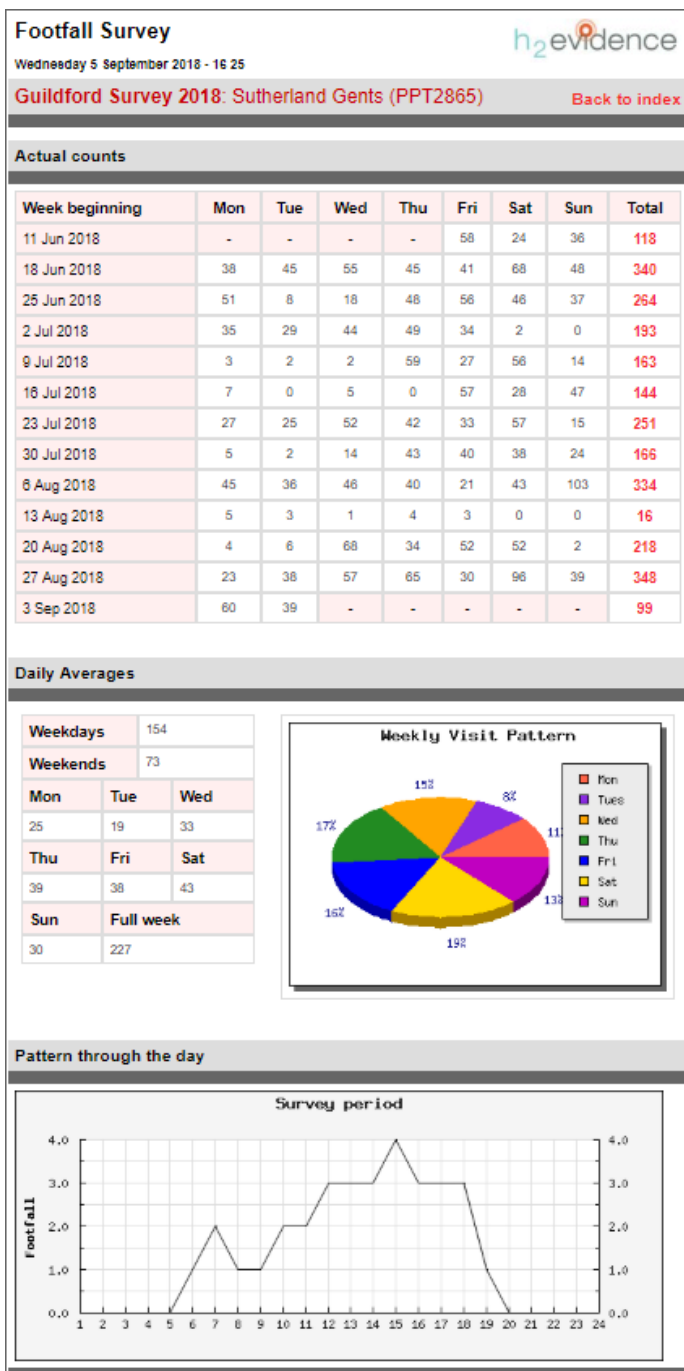
Stoke Park

A high use site which is busy at weekends and tends to peak daily at lunch which is expected due to it's park location. Expect a seasonal drop as the weather gets colder.



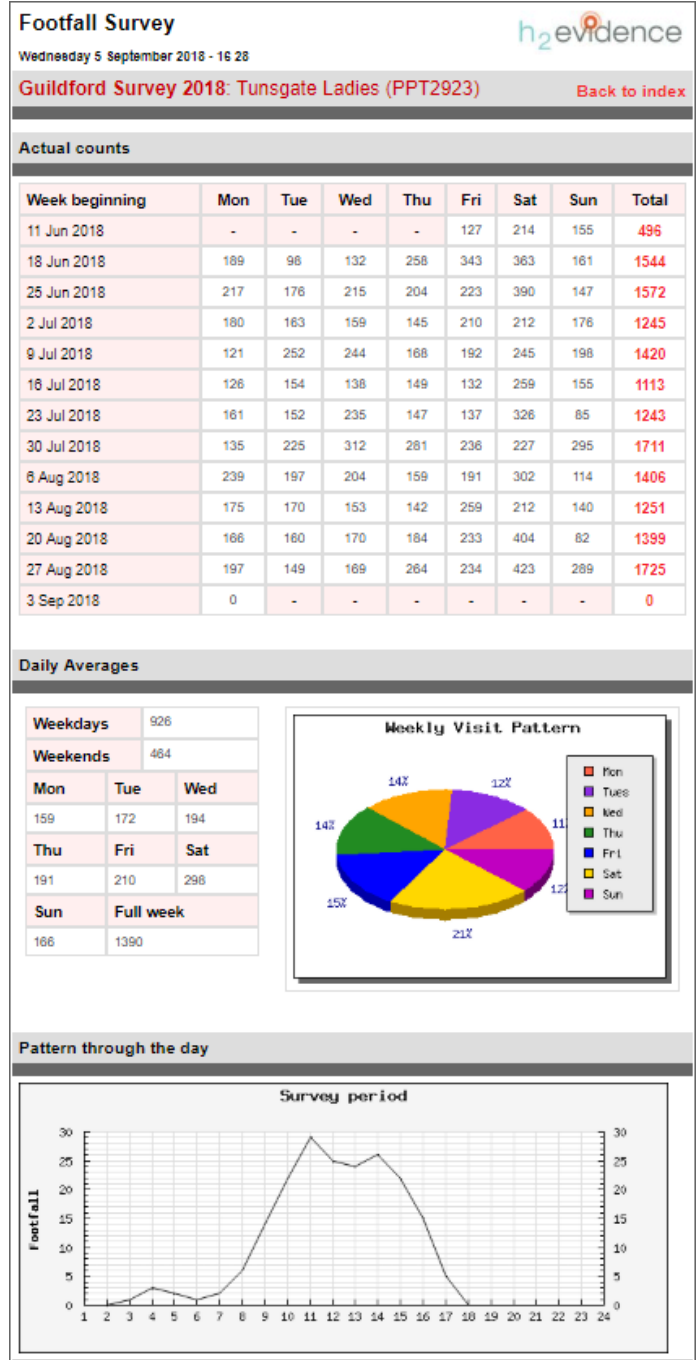
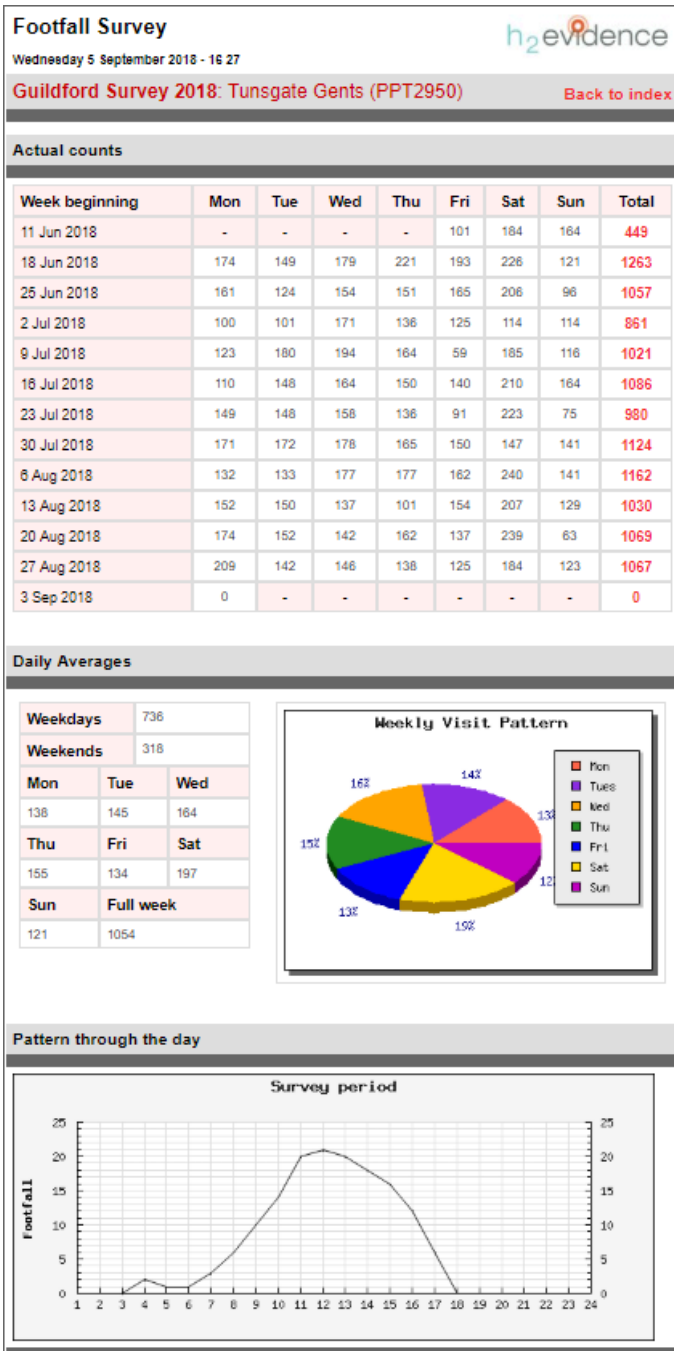
Sutherland

Low use site with constant visits. Daily peak use seems to be the evening rush hour. The ladies is constant during the week whereas the gents has more use at the weekends.



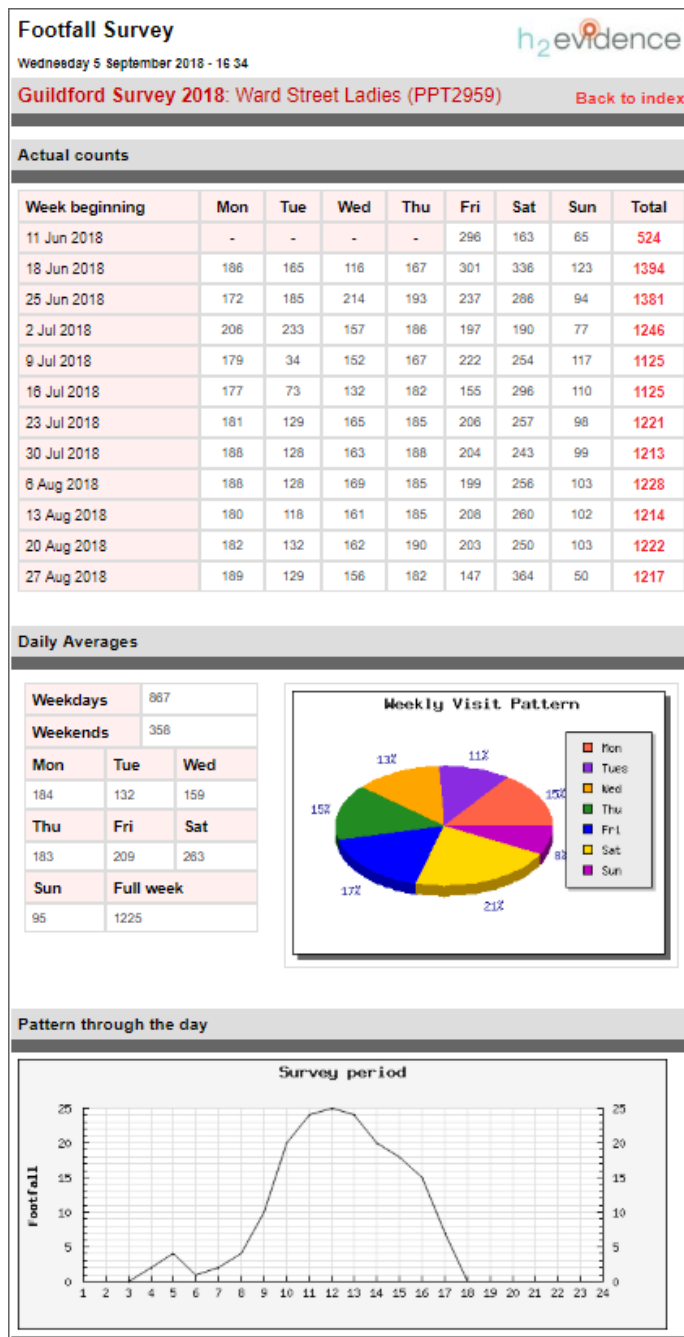
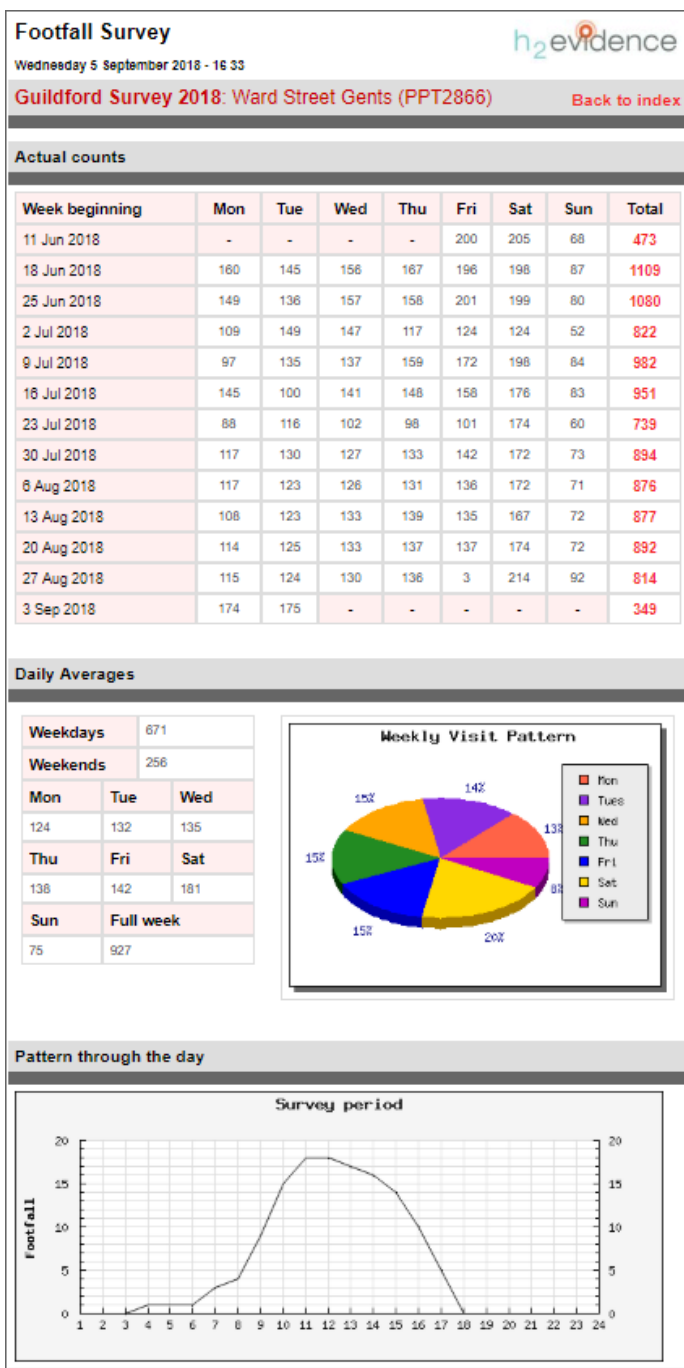
Tunsgate

High use site which shows the expected user trends based on its location. Based on these usage figures the forecasted annual income for this site at 20p per use would be in the region of £12,000pa.



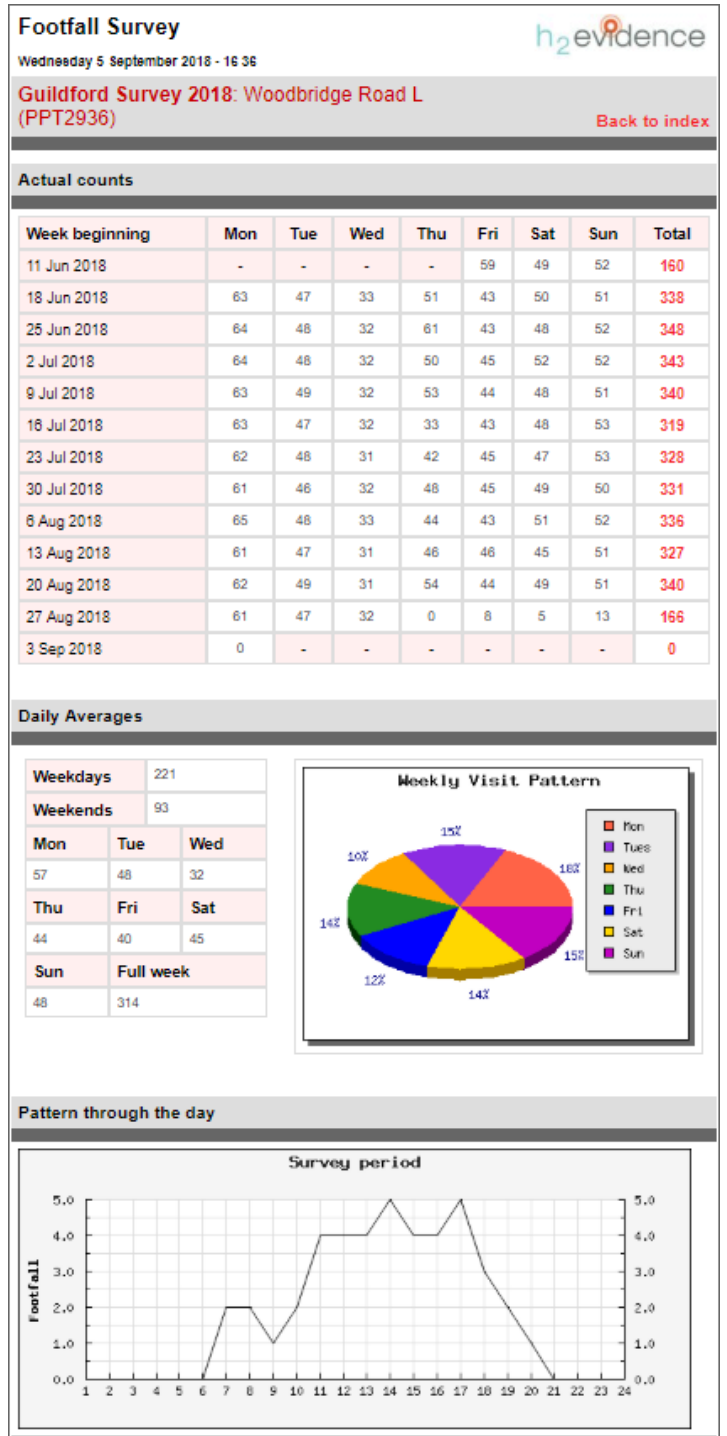
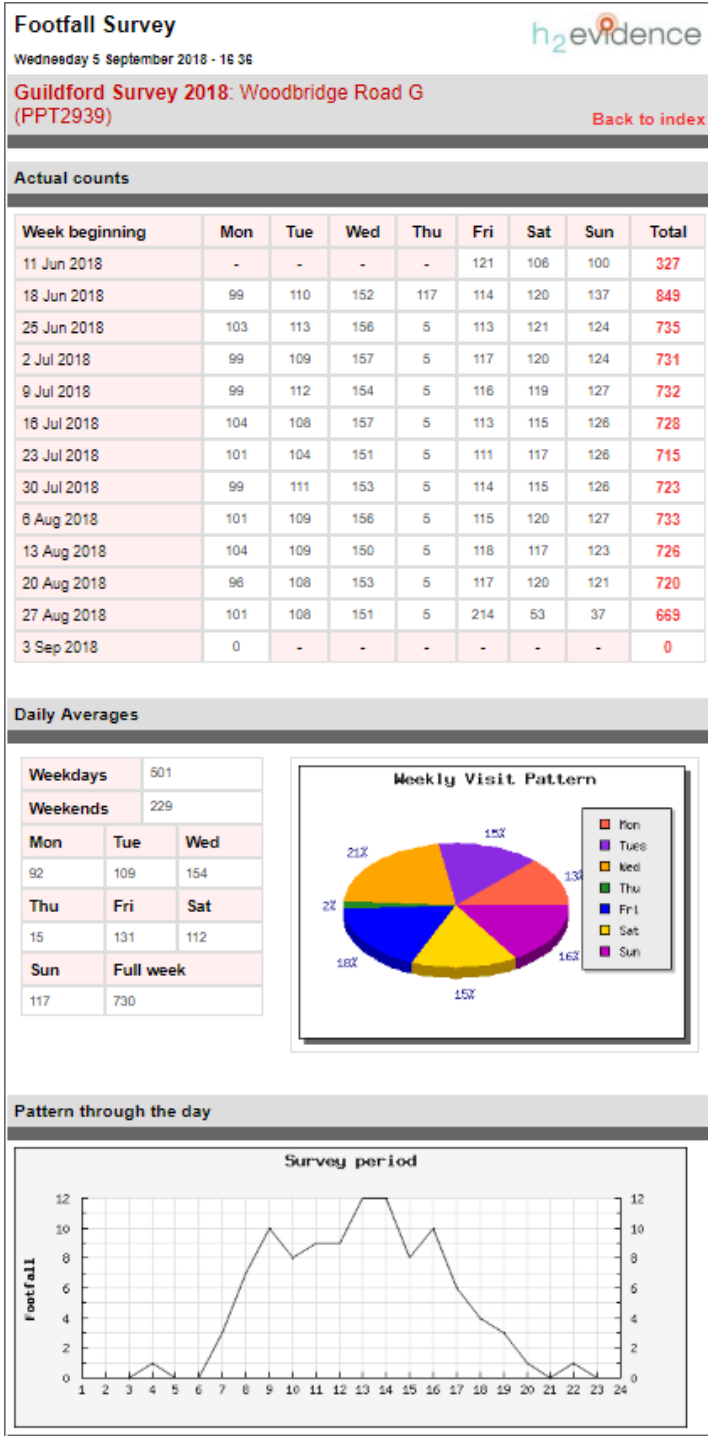
Ward Street

Similar to Tunsgate, this high use site shows usage trends expected from its town centre location.



Woodbridge Road

A high use site which has a prominent location on a busy road. Usage is constant throughout the day. Gents has an unexpected low use trend on a Thursday.



From: Dennis Wheeler <dennis.wheeler@ashpcsurrey.gov.uk>
Sent: 02 November 2021 13:35
To: Toilet Review <ToiletReview@guildford.gov.uk>
Cc: Nigel Manning <nigel.manning@ashpcsurrey.gov.uk>; jo.randall <jo.randall@ashpcsurrey.gov.uk>
Subject: RE: Public Toilets Provision Review

Hello Stuart.

I am led to believe that the toilet review is going to EVB soon. I have been told that my Councils comments were not in your report. Somehow the comments must have been lost in the ether. It is quite simple, the public toilets in the Ash Wharf are essential not only for residents, but for visitors to Ash Parish. Guildford Borough Council in the past must have recognised how essential this facility is to village life by part funding this service.

These toilets are used by many businesses including Guildford Borough Council Staff, Post Office staff and delivery drivers, when carrying out their duties in the Parish. School children use this facility whilst using the Recreation Ground, or on their way home from school.

The cutting of the funding will put yet another stress on the Parish budget and precept.

Please reconsider cutting the funding for this very important service to the public in our village.

Regards

Dennis Wheeler DMS
Parish Clerk to the Council
Ash Parish Council
The Ash Centre
Ash Hill Road
Ash
Surrey
GU12 5DP
Tel 01252 328287
Fax 01252 319338
www.ashpcsurrey.gov.uk

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PUBLIC TOILET EXPENSES ANALYSIS

Description	2017/2018		2018/2019		2020/2021		CURRENT YEAR	
	Debit	Credit	Debit	Credit	Debit	Credit	Debit	Credit
GBC Concurrent Grant		£9,360.00		£9,360.00		£9,360.00		£9,360.00
Salaries & Wages	£3,247.38		£3,543.57		£5,877.00		£3,918.00	
Water Rates	£2,016.54		£662.19		£5,643.33		£3,328.67	
Elec & Gas	£257.84		£618.72		£950.16		£731.44	
Cleaning Cost	£531.87		£651.00		£130.00		£450.63	
Mis Expense	£23.50							
Insurance	£1,736.55		£1,391.43		£1,401.00		£1,571.00	
Property Maintenance	£4,855.00		£602.46		£750.00		£800.00	
Grounds Maintenance								
Equipment & small Tools	£14.99							
Admin Reallocation	£702.91		£774.79		£1,623.00		£1,082.00	
Totals	£13,386.58	£9,360.00	£8,244.16	£9,360.00	£16,374.49	£9,360.00	£11,881.74	£9,360.00

Dennis Wheeler:
Water Rates low as usage
not billed by supplier added
to invoices in 2020/2021
£2415.00

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Ripley Parish Council Office
Ripley Primary School
Wentworth Close
Ripley
Surrey
GU23 6ED
Phone: 01483 224847
clerk@ripleyparishcouncil.gov.uk
www.ripleyparishcouncil.gov.uk

3rd December 2021

Dear Stuart, Cllr Cross, Cllr Bigmore,

Re: Public Toilets Provision Review

Further to various emails between Stuart and our Clerk, we wish to advise you that we believe the loos on Ripley Green merit a special case. As you are undoubtedly aware, Ripley Green has always been an attraction to many visitors from within the borough and the wider county, who utilise the beautiful open space for walking, exercising dogs, visiting the children’s playground, and enjoying and participating in sporting pursuits.

This has been magnified hugely during the Covid pandemic and we have welcomed many more visitors to our Village Green. This open space has provided an invaluable resource, in particular for people’s mental health and physical wellbeing.

We are a small village of around 900 dwellings and our precept is already significantly higher than many other villages, mainly as a result of the huge costs of maintaining The Green and its environment. These costs include insurance, tree surveys and works, fencing, providing dog ‘gloves’, unauthorised encampments, general upkeep, playground maintenance, and biodiversity objectives.

To give some perspective, our annual precept has been under £70,000 per annum, whilst expenditure specific to The Green over the past three financial years is as follows:

Year	Precept	The Green expenditure
2020-21	£67,099	£45,702
2019-20	£65,159	£38,262
2018-19	£64,636	£32,997

We want to make it clear that Ripley Parish Council and its residents have always been prepared to finance the upkeep of The Green even though it represents a significant proportion of our precept income, for the benefit of not only our residents but the wider borough and county community.

However, the proposed closure of the public lavatories is an issue that has wide ranging consequences, not least for the less able-bodied visitors who enjoy Ripley Green specifically because it offers disabled parking, disabled access lavatories, and is a huge, flat and accessible open space.

Ripley Parish Council simply cannot afford an additional £6,270 per annum to fund these loos, in addition to the £40k per annum that we already spend on The Green itself. Essentially, we need some help and we are looking to GBC to keep these loos open as part of a very valued resource within the borough.

We know that you have to make cost savings for your 2022-23 budget, but we would urge you to reconsider this proposed closure and keep Ripley loos open for the benefit of all.

If you are in any doubt as to the value of this asset, we would welcome a visit and we will gladly show you The Green and why it is so important to keep these loos open.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Suzie Powell-Cullingford'. The signature is fluid and cursive, with a large loop at the end.

Cllr Suzie Powell-Cullingford

Vice-Chairman, Ripley Parish Council



SHERE PARISH COUNCIL

Suzanne Hoyland
Parish Clerk/RFO
Telephone: 01483 203431
clerk@shereparishcouncil.gov.uk
www.shereparishcouncil.gov.uk

Tanyard Hall
30 Station Road
Gomshall
Guildford
Surrey
GU5 9LF

20th September 2021

Stuart Riddle
Project Lead
Public Toilets Provision Review
Operational and Technical Services
Guildford Borough council

Dear Stuart,

Thank you for consulting Shere Parish Council regarding the review into the grant for the public conveniences in Shere.

Background

The building where the toilets are housed is the Old Fire Station. This is a Grade II listed building in the centre of Shere and was initially leased to the Parish Council in 1977 from Shere Manor Estate and converted to public conveniences. The listed building is important to the character of the village and the AONB. Any repairs or improvements are subject to Listed Building Consent.



Through the access door to the ladies there is a disabled cubicle on the left and another door to the ladies which has one cubicle. From the ladies there is an access door to the storage room. Each has a sink and a hand dryer. In the gentlemen's conveniences there two urinals, one cubicle, sink and hand dryer. Both also have baby changing facilities.

Over the years the toilets have been redecorated, store room rebuilt and maintained to usable standard but they have not been refurbished in any meaningful way for decades. All facilities need upgrading and bringing up to standard, as soon as possible.

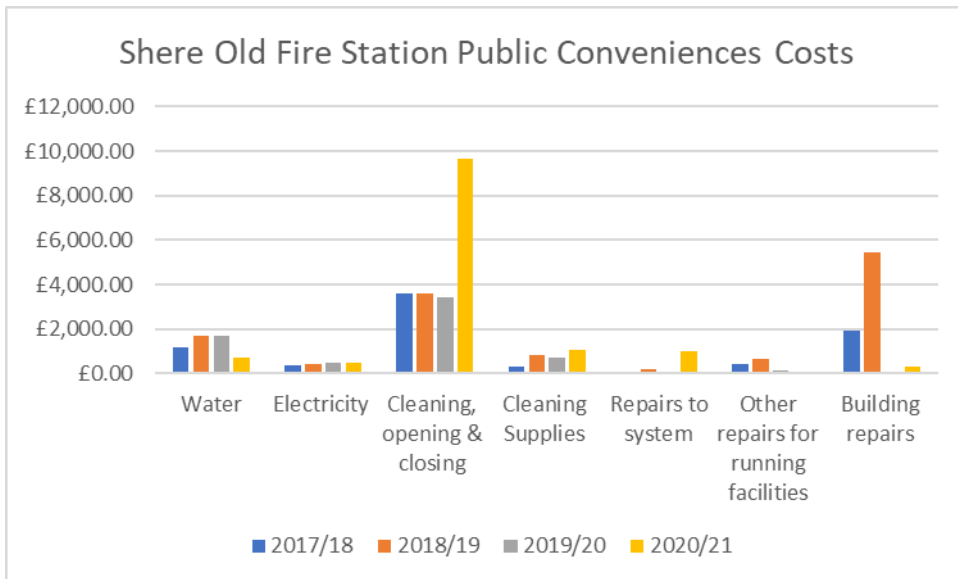
Upkeep

It was argued many years ago that the toilets are for visitors and not for the residents of Shere Parish (four villages and half of Abinger Hammer) or from the surrounding villages. As the Parish is relatively small, no resident is more than approximately five miles from their house and as such rarely uses the conveniences. The precept received from Guildford Borough Council comes from the council tax and is to use for the benefit of the residents and community but at the moment in excess of 10% of the precept (last year 10.16%) is spent on the facilities for visitors this, amounted to £13,195.33 in 2020/21.

Agenda item number: 5

Please see breakdown of costs below. You will notice that our cleaning costs have increased significantly.

Appendix 7



The current year 2021/22 is predicted to be similar – please see below

Year	Water	Electricity	Cleaning, opening & closing	Cleaning Supplies	Repairs to system	Other repairs for running facilities	Building repairs	Total	Precept	Running facilities % of precept
2021 - to Sept 2021	£486.53	£214.30	£3,750.00	£461.98	£670.99	£320.00	£490.00	£6,393.80	£140,240.00	Predicted to being similar to last year approx. 10%

Visitor numbers have increase exponentially over the last few years. Where it was once just busy weekends, now all car parks and on street parking is fully utilised throughout the week. New businesses such as Hilly’s tearoom, Dabbling Duck and Shere Delights Ice Cream Parlour, have also encouraged more visitors to the village and as a result, Shere is now seen as a tourism destination.

The village is advertised by Visit Guildford as ‘The picturesque route now follows the A25 eastwards passing through firstly **Shere**; widely considered to be one of the most quintessentially English villages in Surrey. It has a central cluster of old houses, a few shops, a tea house, art gallery, two pubs, a Norman church and a museum, with a steam running through the middle. There are also some fantastic examples of Lutyens architecture here, too - quite romantic really. Apparently, he was in love with a local girl and kept coming back to build something else to impress her! It is clear to see why Shere has been used as a location for many films.’

2012 Olympics have encouraged more cyclists to the area and Shere has one of the few public toilets throughout the Surrey Hills. It’s a regular stopping off point for cyclists to use the facilities; both on road and off-road cyclists. Events also take place throughout the year, further encouraging visitors and participants.

Coronavirus Covid-19

During lockdown visitors from outside of the Parish frequented Shere on a regular and increased basis. With no restaurants, cinemas or holidays to entertain, Shere was inundated with visitors. For a while the toilets were shut during the first lockdown. However, it was necessary to reopen for health and safety, as human waste was found around the building and near resident’s houses. One householder was asked by a visitor to use their toilet, as they were visiting from many miles away.

Due to the coronavirus, new cleaners were engaged and it was necessary for the cleaning regime to be doubled, during the height of the virus. With additional use, there have been many more problems with the drainage which

has had to be cleared five times this year already. Previous to the last year, just as in 2017 where there had been a problem with the drains, was extremely rare.

Furthermore, throughout the pandemic visitors have been calling to ask if the toilets were open, to plan their trip.

Summary

There is no doubt that the toilets in Shere are vital but not for residents, they are vital for visitors. The Parish Council is finding that it is increasingly necessary to pay for works, which should be the responsibility of Guildford Borough Council or Surrey County Council – for example the new recycling bins in Shere and pavement widening in Middle Street, both of which are arguably due to the impact of visitors. It is not possible for the Parish Council to continue to support and serve our residents and community, when so much income is spent on those visiting the village. It has reached critical point with the car park, toilets, environment and traffic.

For many years Alderman Keith Childs (former GBC Councillor and Mayor) argued on the Parish Council’s behalf that the toilets are the responsibility of Guildford Borough Council and this is still the case and even more so today.

The Parish Council hopes that you will continue to support running the public conveniences in Shere, for visitors to use.

I look forward to hearing from you.

Kind regards

Suzanne Hoyland
Parish Clerk & RFO

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Shere Parish Council objects to the recommendation to remove the grant to operate the public conveniences in Shere.

Reducing the number of toilets in Guildford causes a reduction in public availability and means a longer walk to the nearest facility for members of the public. In Shere, if the Parish Council is forced to close the toilets it would represent a 100% reduction in toilet facilities in an isolated village, which is actively promoted as a tourist spot for people visiting the beautiful County of Surrey.

Even with the small grant of £4,680, the Parish Council bears net annual running cost to our precept and community of at least 6% of precept, and this does not account for any major refurbishment costs which are much needed and substantial, in the region of £60,000. The toilets are provided and used by visitors.

During the first lockdown of the pandemic the toilets were closed which led to members of the public defecating in the doorways of resident's houses.

Please support the village of Shere and help provide for the tourists. Please remember that Shere is part of the wider Borough.

Thank you

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For attention of:

Stuart Riddle, Project Lead, Public Conveniences Review,
Guildford Borough Council.

24.11.21

Dear Stuart,

The Onslow Village Tennis Club committee met and discussed our response to the council's plans to close some of the public conveniences in the borough, as requested by you.

While it appears from point five of your review that the toilets next to Onslow Recreation Ground are not in immediate danger of closure, we feel it's important to register our opposition to any plans to do so in future.

The Rec and Arboretum are both wonderful and popular facilities which are enjoyed by many people of all ages throughout the year for a wide range of activities - football, fitness, dog walking, picnicking, etc. and using the superb playground - in a safe and healthy environment. The tennis club is delighted to be part of this.

We feel strongly that closing the toilets would seriously reduce the attraction of the Rec. In particular, the number of families with small children using the Rec means that the toilets are always likely to be needed in an emergency – the alternative hardly needs to be stressed.

The tennis club has no ability or funds to support taking on the toilets which are used by all park users beyond the hours of operation of the tennis club

We have passed your email to the Residents' Association and various other village groups, who we are sure will take a similar view to ours.

Best wishes,

OVLTC Committee

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From: amanda@experienceguildford.com <amanda@experienceguildford.com>
Sent: 31 August 2021 17:04
To: Toilet Review <ToiletReview@guildford.gov.uk>
Cc: pete <pete@experienceguildford.com>
Subject: RE: Experience Guildford - Public Toilets Provision Review

Hello Stuart

Nice to e-meet you.

Thanks for getting in touch about this review. I look forward to helping you with in out from the town centre businesses.

I would kick off with the following comment: Speaking on behalf of 560 town centre businesses, Experience Guildford would be against the closure of any public toilets in the town centre. Ward Street are used by the North Street

Market traders and High Street market traders rely on the Tunsgate toilets being open. With no public toilets in Tunsgate Quarter, the latter are essential. When people plan a day trip to Guildford (or anywhere for that matter) they often choose a destination or length of stay at a destination based on the convenience and location of the public toilets. This becomes particularly important to people with disabilities or the elderly. I fear we may alienate a swathe of day visitors if we do not keep the toilets accessible all day as they are now.

I hope this helps for starters? Do give me a call if you would like to discuss further

All the best
Amanda

From: amanda@experienceguildford.com <amanda@experienceguildford.com>
Sent: 12 November 2021 17:16
To: Stuart Riddle <Stuart.Riddle@guildford.gov.uk>
Cc: Claire Suggitt <Claire.Suggitt@cbre.com>
Subject: Public convenience review

Hi Stuart

I hope this finds you well.

I have just been alerted to the agenda of last week's EAB meeting. I have to say I am more than a little alarmed to see in your report that there is apparently a "high possibility" that we will take over Tungstate toilets. [Item 4 - Public Conveniences Appendices Complete.pdf \(guildford.gov.uk\)](#)

BIDs cannot replace a service. They can add to or enhance a project, service or product. So, simply put, I would say our support in this matter might be to highlight to the visiting public where the toilets are located and for my rangers to alert the cleaning team when there is an issue. We could never take on the council function as your report suggests we might.

If you would like to discuss this further, please do give me a call

Best wishes
Amanda

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From: David Beaman

Sent: 11 September 2021 06:40

Subject: Re: Guildford Access Group - Public Toilets Provision Review [UNC]

For the attention of Stuart Riddle, Project Lead - Public Toilet Provision, Guildford Borough Council

My attention has been drawn by Sophie Butcher (GBC Democratic Services Officer) as a member of Guildford Access Group on which I represent South West Surrey Disability Empowerment Network (which I Chair and represents the interests of the less able community in Guildford and Waverley) to the current review of public toilet provision in Guildford for which you are the designated Project Lead.

In addition to my position as Chair of South West Surrey Disability Empowerment Network I am also an elected Farnham Resident councillor representing Farnham Castle ward on both Waverley Borough and Farnham Town Councils so I am more than well aware of the financial impact on local authorities of continued reductions in Central Government financial support for the provision of public services which has been exacerbated by the financial impact of COVID. As you are aware this has resulted in Guildford and Waverley Borough Councils seeking to investigate various ways to work closer together to reduce costs without affecting overall provision of public services.

Whilst it is appreciated that Guildford Borough Council (GBC) is, like Waverley Borough Council, having to review all its costs I am very concerned that consideration is even being given to "investigate which small number of public toilets could be viable to close in a way which minimises impact to our residents while delivering much needed cost savings". To start with use of the phrase "viable to close" is, apart from being an interesting definition of the word viable, implies that some public toilets will have to close. This is the wrong way to even start approaching this matter.

The provision of public toilets is an essential service that is valued not just by those with medical conditions which may require them to have a need to use toilets at short notice but by all members of the community especially the elderly and those with babies and young children requiring changing facilities. It is, therefore, suggested that GBC should before considering any closures investigate the following courses of action to see whether that the level of public toilet provision could be maintained and could even be enhanced viz :-

- **Seek Financial Contributions From Parish Councils :** In Waverley the provision of public toilets has been mainly taken over by Parish and Town Councils who have greater freedom to take on the responsibility and cost of public toilet provision since to date these costs can, if Parish and Town Councils wish, be passed onto local residents through increases in Parish and Town precept over which unlike Borough and District Council charges there has, to date, been no limits over level of precept increase that can be applied by Parish and Town Councils. Outside Guildford Town Area there are 24 parishes in GBC of which 23 have Parish Councils. According to GBC's website all public toilets outside Guildford Town Area only the public toilet in Ripley is maintained by GBC although there are public toilets in Shere and Ash that are not provided and maintained by GBC (are the provision and cost of maintaining public toilets in Shere and Ash the responsibility of the respective Parish Councils?). Since the public toilets although mainly located in the Guildford Town Area, benefit ALL residents of Guildford I think it would be appropriate to seek some financial contribution from all Parish Councils for the cost of maintaining public toilet provision in Guildford Town Centre. At the very least Ripley Parish Council should be requested to take on the financial responsibility for maintaining the public toilets on Ripley High Street.
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Agenda item number: 5
Appendix 11

- **Seek Alternative Ways of Funding Public Toilet Provision** : Whilst every effort should be made to reduce costs of public toilet provision care needs to be taken to ensure that an overall level of public toilet provision is maintained at all times particularly in the evenings and on Sundays and Public Holidays. Other alternative methods of funding public toilet provision need to be investigated.
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- - **Charging** could be considered at some (but not all) public toilets where enhanced facilities are provided (or where improvements require to be funded) although care would need to be taken that any revenue earned was significantly greater than costs that would be incurred in collecting any revenue earned. It should, however, be noted that National Rail no longer charges at public toilets at their stations which includes Guildford
- - **Sponsorship** should be considered for public toilets particularly for those public toilets that are located close to commercial organisations that are likely to directly benefit from their provision such as G Live and Tunsgate Centre
- - **Increase Other Charges** : Consideration needs to be given to increasing car park charges where public toilets are provided as part of car parking provision (Bedford Road, Farnham Road and York Road) and recreation ground charges where public toilets are provided (Stoke Park, Shalford Park and Onslow Recreation Ground).
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- **Seek Permission for Public to Use Other Provided Toilets** : Some public toilets are provided "commercially" as part of their overall provision to the public - the public toilets in The Friary Centre on the Food Court floor being a good example in Guildford. There are, however, many other public toilets provided particularly in restaurants, public houses, sport and fitness centres (some of which I assume are under the control of GBC), supermarkets and petrol stations which are generally only for use by those using those facilities to purchase something. Farnham Town Council has been successful in managing to reach agreement with a number of owners of these toilets in Farnham to allow people to use these facilities without requiring any need to purchase anything. Similar agreements should be investigated in Guildford which could enhance the overall level of public toilet provision.

It is, therefore, our opinion that instead of investigating which public toilets are no longer "viable" and should be closed the emphasis should be on means of different ways of funding public toilet provision in Guildford and the possibility that could exist to enhance the level of public toilet provision by reaching agreements with other providers of toilets in the town to allow people to use their facilities without any obligation to purchase any of their goods or services.

When your report is finalised I would appreciate receiving a copy and, if possible, I would also like to have the opportunity to address any Committee or Council meeting at which recommendations are made and decisions taken.

I hope that these comments are helpful and I look forward to hearing from you in due course although in the meantime if there is any further information that I can provide please do not hesitate to let me know.

David Beaman
Chair - South West Surrey Disability Empowerment Network
(Also Waverley Borough and Farnham Town Councillor - Farnham Castle Ward and Chair of WBC's Western Area Planning Committee)

Equality Impact Assessment – Allen House toilet

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Allen House public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Allen House toilets include a disabled toilet and baby changing facilities.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Allen House to access Guildford’s workplaces, shops, and hospitality
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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2. Is the proposed activity accessible for all the protected groups listed below? <i>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)</i>			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets and closest toilets if York Road car park used. The next nearest facility has the same provisions and is on Ward Street.
Race		No	Closure will affect all races equally – the next nearest facility has the same provisions as Allen House.
Gender		No	Closure will affect all genders equally – the next nearest facility has the same provisions as Allen House.
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Allen House.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence. The next nearest facility has the same provisions and is on Ward Street.
Religion or belief		No	Closure will affect all religions and beliefs equally - the next nearest facility has the same provisions as Allen House. This is the closest public facility to York Road Synagogue but it is assumed the Synagogue has its own toilets.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Allen House.

Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facility has the same provisions as Allen House.
Pregnancy or maternity	Yes		Closure of baby changing facilities and closest toilets if York Road car park used. Pregnant women have an increased chance of urinary incontinence. The next nearest facility has the same provisions and is on Ward Street.

4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Allen House toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage. This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Allen House toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Bedford Road toilet

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Bedford Road public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Bedford Road toilets include a disabled toilet and baby changing facilities.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Bedford road to access Guildford’s workplaces, shops, and hospitality
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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2. Is the proposed activity accessible for all the protected groups listed below? <i>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)</i>			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets and closest toilets if Bedford Road car park used. The closest facility is not Council provided and is in the Friary Shopping Centre. Although, this facility also has disabled toilets it is not 24 hours like Bedford Road.
Race		No	Closure will affect all races equally – the next nearest facility has the same provisions as Bedford Road.
Gender	Yes		Bedford Road is 24 hours and the nearby, identical provision, in the Friary Shopping Centre closes at 6pm leaving the only late-night alternative as pop-up urinals, where usage is preferred by males, in North Street. However, the average use of the female toilets at Bedford Road toilets is zero between 6pm and 7am (2018 public toilet user count).
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Bedford Road.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence.
Religion or belief		No	Closure will affect all religions and beliefs equally - the next nearest facility has the same provisions as Bedford Road. There are other public conveniences closer to Guildford's places of worship.

Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Bedford Road.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facility has the same provisions as Bedford Road.
Pregnancy or maternity	Yes		Closure of baby changing facilities and closest toilets if Bedford Road car park used. Pregnant women have an increased chance of urinary incontinence. The closest facility is not Council provided and is in the Friary Shopping Centre. Although, this facility also has baby changing facilities it is not 24 hours like Bedford Road.

4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Bedford Road toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage. This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Bedford Road toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Farnham Road toilets

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Farnham Road public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Farnham Road toilets include a disabled facility.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Farnham Road to access Guildford’s train station and workplaces.
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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2. Is the proposed activity accessible for all the protected groups listed below? <i>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)</i>			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets and closest toilets if Farnham Road car park used. The closest facility is not Council provided but have the same relevant provisions - Guildford Train Station and the Friary Shopping Centre.
Race		No	Closure will affect all races equally – the next nearest facilities have the same relevant provisions.
Gender		No	Closure will affect all genders equally – the next nearest facilities are not Council provided but have the same relevant provisions.
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facilities are not Council provided but have the same relevant provisions.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence.
Religion or belief		No	Closure will affect all religions and beliefs equally. This is the closest public facility to St Nicolas Church but it is assumed the Church has its own toilets.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facilities are not Council provided but have the same relevant provisions.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facilities are not Council provided but have the same relevant provisions.

Pregnancy or maternity	Yes	Pregnant women have an increased chance of urinary incontinence. The closest facility is not Council provided but has better provisions as they include baby changing facilities - Guildford Train Station and the Friary Shopping Centre.
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4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Farnham Road toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage.

This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Farnham Road toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Onslow Recreation Ground toilets

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Onslow Recreation Ground public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Onslow Recreation Ground toilets have no nearby alternative.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Onslow Recreation Ground, Onslow Village Lawn Tennis Club and the changing room for football.
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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2. Is the proposed activity accessible for all the protected groups listed below? <i>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)</i>			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		There is not a disabled provision at Onslow Recreation Ground toilets. However, closure could leave those that may need quicker access to a toilet, due to their disability, with no alternative.
Race		No	Closure will affect all races equally – there is no nearby public provision.
Gender		No	Closure will affect all genders equally – there is no nearby public provision.
Sexual orientation		No	Closure will affect all sexual orientations equally - there is no nearby public provision.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence so may need quicker access to a toilet. The Recreation Ground and its playground is regularly used by children. Particularly children aged 4 - 7 after the neighbouring Onslow Infant School finishes.
Religion or belief		No	Closure will affect all religions and beliefs equally. This is the closest public facility to St Nicolas Church but it is assumed the Church has its own toilets.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facilities are not Council provided but have the same relevant provisions.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – there is no nearby public provision.

Pregnancy or maternity	Yes		There is no baby changing facility at this toilet. However, pregnant women have an increased chance of urinary incontinence so may need quicker access to a toilet.
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4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Onslow Recreation Ground toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage.

This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Onslow Recreation Ground toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Ripley toilets

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Ripley public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Ripley toilets have a disabled facility.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Ripley Green or shops and hospitality along Ripley High Street
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Based on the above information, is the activity relevant to equality?

Yes – continue to section 2	Yes
No – please record your reasons why the activity is not relevant to equality	

2. Is the proposed activity accessible for all the protected groups listed below?

(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)

Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?

Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets. There is no nearby public provision but many businesses, that residents or visitors may use, will have toilets.
Race		No	Closure will affect all races equally – There is no nearby public provision but many businesses, that residents or visitors may use, will have toilets.
Gender		No	Closure will affect all genders equally – There is no nearby public provision but many businesses, that residents or visitors may use, will have toilets.
Sexual orientation		No	Closure will affect all sexual orientations equally - There is no nearby public provision but many businesses, that residents or visitors may use, will have toilets.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence so may need quicker access to a toilet.
Religion or belief		No	Closure will affect all religions and beliefs equally - There is no nearby public provision but many businesses and places of worship, that residents or visitors may use, will have toilets.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - There is no nearby public provision but many businesses, that residents or visitors may use, will have toilets.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital There is no nearby public provision but many businesses, that residents or visitors may use, will have toilets.

Pregnancy or maternity	Yes		There is no baby changing facility at this toilet. Pregnant women have an increased chance of urinary incontinence so may need quicker access to a toilet.
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4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Ripley toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

We hope that Ripley Parish Council may be able to take this toilet over. However, if not possible, there is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage.

This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Ripley toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. While it is possible that Ripley Parish Council could take this toilet over it would have to be closed if an agreement cannot be reached. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position. It is important to note that the footfall survey showed Ripley having the lowest number of visitors.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Tunsgate toilet

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Tunsgate public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Tunsgate toilets include a disabled toilet and baby changing facilities.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Tunsgate to access Guildford’s workplaces, shops, and hospitality.
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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Agenda item number: 5
Appendix 17

2. Is the proposed activity accessible for all the protected groups listed below? <i>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)</i>			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets. The closest facility is Ward Street toilets, that also include disabled toilets.
Race		No	Closure will affect all races equally – the next nearest facility has the same provisions as Tunsgate.
Gender		No	Closure will affect all genders equally – the next nearest facility has the same provisions as Tunsgate.
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Tunsgate.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence and may need to access a toilet quickly.
Religion or belief		No	Closure will affect all religions and beliefs equally - the next nearest facility has the same provisions as Tunsgate.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Tunsgate.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facility has the same provisions as Tunsgate.
Pregnancy or maternity	Yes		Closure of baby changing facilities. The closest facility is Ward Street toilets, that also include baby changing facilities. Pregnant women have an increased chance of

			urinary incontinence and may need to access a toilet quickly.
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4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Tunsgate toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate. It is acknowledged that, due to the high footfall, it would not be possible for both Tunsgate and the alternative Ward Street to close.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage.

This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Tunsgate toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Ward Street toilet

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Ward Street public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Ward Street toilets include a disabled toilet and baby changing facilities.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Ward Street to access Guildford’s workplaces, shops, and hospitality.
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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Agenda item number: 5
Appendix 18

2. Is the proposed activity accessible for all the protected groups listed below? <i>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)</i>			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets. The closest facility is Tunsgate toilets, that also include disabled toilets.
Race		No	Closure will affect all races equally – the next nearest facility has the same provisions as Ward Street.
Gender		No	Closure will affect all genders equally – the next nearest facility has the same provisions as Ward Street.
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Ward Street.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence and may need to access a toilet quickly.
Religion or belief		No	Closure will affect all religions and beliefs equally - the next nearest facility has the same provisions as Ward Street.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Ward Street.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facility has the same provisions as Ward Street.
Pregnancy or maternity	Yes		Closure of baby changing facilities. The closest facility is Tunsgate toilets, that also include baby changing facilities. Pregnant women have an increased chance of

			urinary incontinence and may need to access a toilet quickly.
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4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Ward Street toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate. It is acknowledged that, due to the high footfall, it would not be possible for both Ward Street and the alternative Tunsgate to close.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage.

This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Ward Street toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Equality Impact Assessment – Woodbridge Road toilets

The purpose of an assessment is to understand the impact of the Council’s activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Woodbridge Road public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council’s public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council’s directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Woodbridge Road toilets have a disabled facility.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Woodbridge Road Café or are walking into Guildford centre or the train station
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Based on the above information, is the activity relevant to equality?

Yes – continue to section 2	Yes
No – please record your reasons why the activity is not relevant to equality	

2. Is the proposed activity accessible for all the protected groups listed below?

(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)

Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?

Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets. The nearest equivalent public facility is provided by the National Trust. The next nearest Council facility has the same provisions relevant provisions and is at Guildford College and Stoke Park Playground.
Race		No	Closure will affect all races equally – the next nearest facilities are not Council run and is at the BP filling station or the National Trust’s Dapdune Wharf.
Gender		No	Closure will affect all genders equally – the next nearest facilities are not Council run and is at the BP filling station or the National Trust’s Dapdune Wharf.
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facilities are not Council run and is at the BP filling station or the National Trust’s Dapdune Wharf.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence so may need quicker access to a toilet.
Religion or belief		No	Closure will affect all religions and beliefs equally. the next nearest facilities are not Council run and is at the BP filling station or the National Trust’s Dapdune Wharf.
Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facilities are not Council run and is at the BP filling station or the National Trust’s Dapdune Wharf.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facilities

			are not Council run and is at the BP filling station or the National Trust's Dapdune Wharf.
Pregnancy or maternity	Yes		There is no baby changing facility at this toilet. However, the nearby National Trust provided Dapdune Wharf toilets so have changing facilities. Pregnant women have an increased chance of urinary incontinence so may need quicker access to a toilet.

4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Woodbridge Road toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage. This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Woodbridge Road toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021

Executive Report

Ward(s) affected: All

Report of Director of Service Delivery

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Caravan Site Licensing: Fit and Proper Regulations

Executive Summary

The report advises the Executive of new legislation that requires relevant and responsible persons of relevant protected caravan sites (caravan sites that require a licence to operate lawfully) to be fit and proper. The Mobile Homes Requirement for Manager of Site to be Fit and Proper Person (England) Regulations 2020 ("The Regulations") requires those managing or in control of relevant protected sites to make application for inclusion on the Fit and Proper (F&P) Register.

The Regulations also require the Council to assess Fit and Proper applications, Publish/maintain a public register and to publish a fees policy (found in the Caravan licensing Fees Policy in Appendix 1) that justifies the costs charged for Fit and Proper applications. Within Schedule 1, the F&P fee calculation can be observed along with a variation to the annual caravan site licensing fees.

Recommendation to Executive

That the Executive approve a proposed charging structure for Fit and Proper applications.

Reason for Recommendation:

To enable the Council to approve the caravan site licensing policy so that fees are charged to managers of relevant protected sites in reflection of the legislation and the costs that will be incurred by the Council to undertake new statutory duties. In addition, to approve the amended caravan site licensing annual fee that enables this fee to be charged from financial year 2022 that is more reflective of the Council's corporate fee setting methodology.

Is the report (or part of it) exempt from publication? No

1. Purpose of Report

- 1.1 The purpose of the report is to provide the Executive with the information to approve the Fit & Proper charging structure, policy and fee - that will enable the Council to cover its costs whilst undertaking its duties to require managers of relevant protected caravan sites to be fit and proper. In addition, the report presents a variation to the generic caravan site licensing fee (seen in table 1; Schedule 1) that requires approval.

2. Strategic Priorities

- 2.1 The new Regulations that this report concerns impose another layer of regulation to relevant protected caravan sites (those that require a licence from the Council), that the site manager is assessed as being Fit and Proper. The Regulations exempt holiday parks and some residential sites (that are operated by 1x family only and not run for profit). The new Fit and Proper requirements may serve to increase site licence compliance/management and reduce poor site managers.
- 2.2 Enabling residents to have access to safe and suitable homes that are compliant with legislation supports the objectives of the current Housing Strategy. Protecting the most vulnerable people from non-compliant housing conditions that emanate from poor site management will inaugurate the community aims of the Council's Corporate Plan.
- 2.3 Residential caravan sites are often occupied by elderly residents who are captured into the vulnerable group for many of the most serious housing hazards to health and wellbeing. The Fit and Proper Regulations will further protect the residents of caravan sites from poor site managers and increase resident safety and wellbeing.

3. Background

- 3.1 Private sector housing regulation includes the licensing of relevant protected caravan sites, as defined by The Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013. The Council currently regulates over 50 of protected sites that require a site licence to operate lawfully. Such sites range in size and nature, from residential to recreational. Sites that do not require a licence and are exempt from the above legislation are also exempt from the Fit and Proper Person (England) Regulations 2020.
- 3.2 Sites that are exempted by the Fit and Proper Person (England) Regulations 2020 are those that are only occupied by members of the same family and are not being run as commercial residential sites.
- 3.3 Unless exempted from the Fit and Proper Person (England) Regulations 2020, relevant persons from both residential and mixed use (holiday and residential) parks are bound by the Regulations.

- 3.4 Relevant protected sites require a licence from the Council to operate and are subject to additional site licensing requirements. The site licence is permanent and ultimately provides a mechanism to require conditions to be set/varied for site safety. These sites are inspected routinely for compliance with the site licence and this resource is captured by the annual site licence fee charged to relevant protected sites. The frequency of routine inspections is dependent on a sites size and the sites past history of compliance. Existing legal framework enables Compliance Notices and prosecutions to be enacted in response to noncompliance with a site licence.
- 3.5 The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020, introduce a fit and proper person test for mobile home site owners or the person appointed to manage the site. The purpose of the fit and proper person test is to improve the standards of park home site management.
- 3.6 The new Regulations impose a duty on relevant/responsible persons responsible for relevant protected caravan sites to be fit and proper and creates an offence where this is not the case. The Regulations also impose duties upon the Council to fulfil elements of the Regulations.
- 3.7 The implementation of the Regulations is split into two stages. The first stage requires the Council to prepare and publish its register of fit and proper applications by the 1st July 2021. The register has been compiled and was published on time.
- 3.8 The Regulations came into full commencement on 1st October 2021, when the second stage of the Regulations came into force. By this date, all relevant/responsible persons responsible for relevant protected caravan sites should have made application for inclusion of the Council's fit and proper register.
- 3.9 The site owner (or appointed site manager) must apply to the local authority to be included on a register of fit and proper persons. A site owner may only apply if they hold or have applied for a site licence for the site. The same requirements apply where the owner or the site manager is a non-natural person (such as a company).
- 3.10 The Council will consider the application in order to satisfy itself that the relevant person is a fit and proper person to manage the site. They will then make a decision whether to place the person on the register with or without conditions, or not to place them on the register. A site owner will have a right of appeal against a final decision or condition. Appeals will not be assessed by the same officer that processed the initial application.
- 3.11 Decisions to grant or refuse applications will be based on the information supplied within the application form in addition to the required supporting evidence documentation; such as funding arrangements, a Disclosure and Barring document (DBS) that does not contain recorded criminal offences listed in paragraph 3.12 (or any other relevant offences), satisfactory management arrangements, including proof of interest in the land (land registry or lease agreement).

- 3.12 Relevant criminal offences in considering a DBS certificate include but are not limited to:
- a) Whether the applicant has committed any offence involving fraud or other dishonesty, violence, arson or drugs or listed in [Schedule 3 to the Sexual Offences Act 2003](#) (offences attracting notification requirements);
 - b) Whether the named person has contravened any provision of the law relating to housing, caravan sites, mobile homes, public health, planning or environmental health or of landlord and tenant law;
 - c) Whether the named person has contravened any provision of the Equality Act 2010 in, or in connection with, the carrying on of any business;
 - d) Whether the named person has harassed any person in, or in connection with, the carrying on of any business;
 - e) Whether the named person is, or has been within the past 10 years, personally insolvent;
 - f) Whether the named person is, or has been within the past 10 years, disqualified from acting as a company director; and
 - g) Whether the named person has the right to work in the United Kingdom.
- 3.13 Where a site owner or their manager fails a test and they are also unable to identify and appoint a suitable alternative manager who must also undergo the fit and proper assessment, the local authority could appoint a person to manage the site, with the consent of the site owner.

4 Scope

- 4.1 The legislation will apply to all existing site owners and any person who has applied to the local authority for a new licence or for the transfer of an existing licence.
- 4.2 The test will apply to all relevant protected sites (those where a site licence is legally required) unless exempted by the Regulations.
- 4.3 Sites that are exempted by the Regulations are those that are only occupied by members of the same family and are not being run as commercial residential sites.
- 4.4 In determining whether a site is a “non-commercial family-occupied site”, the Council will take the considerations prescribed in the government guidance into account before making a decision.

5 Framework

F&P Application

- 5.1 Applications will only be accepted once they are deemed full and valid. Full and valid applications are those where all relevant information and required supplementary documentation have been supplied, inclusive of all signatures having been obtained and/or completed – applications must be legible.

Documents Required to be Supplied Along with Application

- 5.2 Relevant supplementary documents that are required to be included with application are compulsory. Applications will not be deemed “full and Valid” until all compulsory documents are received. The documents to be included with application are:
- (a) DBS (also known as Criminal Records Certificate) for each individual in relation to whom the applicant is required to provide information. The certificate must have been issued no more than six months before the date of the application. It is for the site owner to ensure that any certificate they provide with an application meets this requirement.
 - (b) Freeholders are required to supply the current land registry search document
 - (c) Leaseholders are required to supply the current lease agreement.
 - (d) Satisfactory management plan that details the management arrangements and personnel.
 - (d) Satisfactory funding arrangements that detail the funding amounts, frequency and personnel.

6 Inclusion on Fit and Proper Register

- 6.1 Fit and Proper (hereafter F&P) application is made for inclusion on the F&P register that is maintained by the Council. The register will be published on the Council’s website as downloadable content, in the same manner the current HMO register is published. However, the Government response to consultation details the Council will also have to keep a hard copy of the register in the Council offices, so that those without internet access do not suffer a disadvantage.
- 6.2 The Register will contain only the information that the legislation prescribes must be included on the register.

7 F&P Conditions and Refused Applications

- 7.1 F&P applications can be refused, granted unconditionally or granted subject to conditions, such as requiring a current manager to undertake a management course. Making a F&P application assessment includes both considering an application for inclusion on the F&P register and also deciding whether it is appropriate to apply conditions to the F&P applicant(s) of the site. Applying

conditions to any site will be made in consideration of the application, supplementary documents and the sites history of compliance with the F&P Regulations and its site licence. F&P conditions imposed on relevant applications may also be varied, where circumstances change. All legislation and statutory guidance will be followed when imposing site conditions.

7.2 The Fit and Proper test is aimed at ensuring that the person managing the site is competent to do so. Conditions set against any application shall relate to the person's ability to secure the proper management of the site. The factors that will be considered are:

- i. The relevant person's competence to manage the site.
- ii. The management structure or funding arrangements for the site.
- iii. An associated person's influence.
- iv. Any other relevant factors.

7.3 The Council will assess whether to grant with/without conditions or refuse each application based on the above points by examining the information in the F&P application form and documentation that must accompany the F&P application. These documents are listed in paragraph 5.2.

7.4 The Council may alter the conditions attached to an entry on the F&P register by adding new conditions or changing or deleting existing ones. This will only be undertaken following a review of the specific case at hand and any material changes to the original application. Where conditions are to be altered the Council must notify the site owner of its interim decision (except in the case where it is deleting a condition) and consider any representations made by the site owner, before reaching a final decision. If a site owner wishes to challenge a decision to alter or not alter any conditions, they will have a right of appeal to the Tribunal.

8 F&P Assessments & Decisions

8.1 F&P assessments will be considered in consultation with government guidance and on a case-by-case basis in consideration of the information in the application & supplementary documents, site/management past history, previous compliance and any other relevant matters. Delegated officers will undertake the assessment of applications and issue decisions.

8.2 F&P assessment decisions will be made in consideration of the following points prescribed in the Regulations:

- Named applicants ability to secure the proper management of the site; Specifically:
 - i. Compliance with the site licence,
 - ii. The long-term maintenance of the site,
 - iii. Whether the relevant person has a sufficient level of competence to manage the site,

- iv. The management structure and funding arrangements for the site or proposed management structure and funding arrangements – (as supplied in the supplementary documents along with F&P application)
 - Responsible and Relevant Persons shall not have committed any of the prescribed crimes or offences in the Regulations nor have had an application under these Regulations rejected by any other local authority. The Guidance specific to these Regulations identifies that the burden is upon the applicant(s) to specify that they have not had a F&P application rejected by another local authority.
 - Having regard to the conduct of any person associated or formerly associated with the responsible and/or relevant person(s).
 - Having regard to any evidence as to any other relevant matters.
- 8.3 Decisions to grant or refuse a F&P application will be made on a case-by-case basis, in light of the information and supporting documentation supplied with application. Conditions will not be applied to F&P applications where there are serious and significant concerns over the information supplied – such applications will be refused and investigated.
- 8.4 The Council is required to have considered the F&P application as soon as reasonably practicable once a full and valid F&P application has been received. The Council must serve both an Initial Decision Notice and then after a 28 day consultation period, serve a Final Decision Notice to formalise its decision upon processing the application. The initial decision notice and the final decision notice may either grant (unconditionally or subject to conditions) or refuse the application.
- 8.5 Between the service of an Initial Decision Notice an applicant has the right to representation within 28 days of the Council serving such an Interim Decision Notice. An applicant may appeal the Council's final decision to refuse an application or grant an application subject to conditions or reduced terms. The Council must consider any representations received before issuing a Final Decision Notice.

9 Rejected Applications

- 9.1 Where a local authority has rejected an application, the local authority must include the following information in the register:
 - i. The name and address of the site to which the application relates.
 - i. That an application in respect of the site has been rejected.
 - ii. The date on which the application was rejected.
- 9.2 Information about a rejected application will remain in the register until a successful fit and proper person application is made in respect of the owner or manager of the site.
- 9.3 For privacy reasons, the name of the rejected applicant will not be included on the register. Local authorities will however be able to consider requests for further

information about the entry on the register, for example the details of the specific conditions attached and any additional information, on a case-by-case basis and in accordance with data protection legislation.

10 Revocation of Site Licence

10.1 In certain circumstances the Council can apply to a court or tribunal for an order to revoke a site licence. These are;

- i. If a site owner (or an appointed manager) is convicted twice or more for operating a site without having been assessed by the Council as a fit and proper person. The Council may apply to the magistrates court for an order to revoke the site licence.
- ii. If a site owner (or an appointed manager) is convicted for operating a site without having been assessed by the local authority as a fit and proper person, the Council may apply to the First-tier Tribunal for an order to revoke a licence.

10.2 The Council is enabled to apply to the Tribunal for an order to revoke a site licence without any requirement of a prior conviction. This provision is reserved for the most extreme of cases. Where there is an urgent need to protect the safety and security of residents, the Council may revoke a site licence without any requirement of a prior conviction.

10.3 The Council is expected to use other powers first where appropriate and in line with the Regulatory Service enforcement policy. The power to revoke a licence without any prior convictions shall be used as a last resort where there is imminent risk to residents and/or the public.

11 Appeals

11.1 A person on whom a final decision notice is served may appeal to the First-tier Tribunal against the following;

- i. Any decision to include the relevant person on the register for an effective period of less than 5 years,
- ii. Any decision to include the relevant person on the register subject to conditions,
- iii. Any decision to reject the application

Notices of Action

11.2 The local authority must serve a notice of proposed action on the occupier if it intends to withdraw or amend a preliminary or final decision notice.

12 Enforcement

12.1 The Council will ensure that all specific Guidance and the current specifics prescribed in the legislation are followed. Any enforcement decisions will be consulted with the Councils legal department before significant enforcement

action or decisions based upon significant appeals/representations are made/taken.

- 12.2 Any enforcement will be aligned with the Council's enforcement policy.

13 Fees

Annual Site Licensing Fee

- 13.1 The annual site licensing fee (seen in Schedule 1) has been amended and recalculated to be in line with the corporate fee setting methodology that is based on officer time spent regulating licensed caravan sites. The caravan licensing annual fee is separate to the Fit and Proper annual fee. The caravan licensing annual fee recovers the costs of routine caravan site inspections and running the service by including all relevant aspects of the caravan licensing procedure – such as travel, inspection and document issuing. The relevant factors can be seen in Table 1; Schedule 1.

14 Fit and Proper Fees

- 14.1 F&P applications must be accompanied by a fee set by the local authority as appropriate. The fee levied will cover the council's costs for this area of work. The fee will not run at a profit and serves to cover the costs of running the service.
- 14.2 There are two fees that the Council may charge in relation to the F&P Regulations:
- i. Application fee - (Inclusive of inclusion on the F&P register)
 - ii. Annual fee – (Inclusive of additional costs incurred from implementing the F&P Regulations)

15 Annual Fee

- 15.1 The Annual fee will not be charged. The option to introduce an annual fee is optional and a method to further cover costs to the Council from undertaking its duties under the F&P Regulations. Introducing annual fees will only be considered if the Council spends significant additional time (not captured by the application fee) regulating F&P legislation. Annual fees will not even be considered until 12-months after the Regulations come into full effect. After 12-months there may be evidence that caravan park sites are broadly non-compliant with the F&P Regulations - in full review of any F&P enforcement.
- 15.2 The conditions which may be imposed upon any F&P application may include conditions requiring additional payments to be made to the local authority by way of annual fee to cover costs incurred monitoring compliance with any specific conditions.
- 15.3 The government guidance details that annual fees are to be calculated in consideration of two possible methods that the Council may choose to adopt:

- i. Based on the number of conditions applied to F&P applications that relate to specific sites. In other words, sites that require more Council resources, will require a higher annual fee.

This method will be adopted (if appropriate after 12-month review) specific to individual sites that have conditions imposed upon their F&P applications.

Or

- ii. Based on the average time the Council has spent on F&P compliance and monitoring on a site.

This method will not be considered due to the difficulty and inaccuracy of evaluating officer time spent enforcing a specific activity at caravan sites. It will not be practicable to split time spent enforcing F&P, when site visits may be undertaken by a range of officers on a range of salary grades – undertaking a range of routine/enforcement activities.

- 15.4 The decision to levy an annual fee will only apply to sites where conditions are applied to a site F&P application. The burden of additional annual site fees will act as a deterrent to poor site management and reward sites where adequate management arrangements are already in place.
- 15.5 The Council will not charge an annual fee to any sites until full review that will take place after the Regulations have been in force for a minimum of 12 months. The annual fee is only to be charged based on additional Council time spent delivering the F&P service. After 12-months the Council will be aware of sites that have conditions attached to their F&P application and will therefore be able to charge for this additional resource in 2022-2023. The Council will consider if an annual fee is proportionate to the nature and number of conditions applied on a case-by-case basis.
- 15.6 The Council will not charge annual fees, if after 12-months, all sites have no conditions applied to applications for inclusion on the register and are also complying with the Regulations.
- 15.7 Where conditions are applied to a F&P application, these conditions must be monitored for compliance by the Council. Private Sector Housing Compliance Officers will be required to check compliance. Where sites have accrued conditions, these sites will require more monitoring than sites that do not have conditions applied to their F&P applications. This additional cost to the Council will be reflected by way of an annual fee – where appropriate.
- 15.8 In setting the level of annual fee, the Council may take into account the following matters on which costs are incurred:
 - i. Letter writing/ telephone calls etc to make appointments and requesting any documents or other information from the site owner or from any third party in connection with the fit and proper process;
 - ii. Handling enquiries and complaints;

- iii. Updating files/ computer systems and website if appropriate;
- iv. Processing the annual fee;
- v. Time for reviewing necessary documents and certificates;
- vi. Preparing reports on breaches of conditions attached to an entry;
- vii. Review any representations from an applicant or third parties, including reviews carried out by manager or lawyers
- viii. Carrying out risk assessment where considered necessary
- ix. Time spent on consulting the site owner and third parties
- x. Time spent on meetings/discussions and in giving informal advice and assistance to site owners
- xi. Officer time can be considered as it may be necessary to visit a site to ascertain whether or not the condition(s) has been met

16 Fit and Proper Application Fee

16.1 The Council has determined its fee policy and levy (seen in Table 2; Schedule 1) in consideration of the following areas prescribed in the government guidance, in relation to applications for entry on a fit and proper register.

- i. Initial enquiries; Publicity/Advertising of new FPP requirements
- ii. Letter writing/ telephone calls etc to make appointments and requesting any Documents or other information from the site owner or from any third party in Connection with the fit and proper process;
- iii. Sending out forms;
- iv. Updating files/ computer systems and websites;
- v. Processing the application fee;
- vi. Land registry searches;
- vii. Time for reviewing necessary documents and certificates;
- viii. Preparing preliminary and final decision notices;
- ix. Review by manager or lawyers; review any representations made by applicants or responses from third parties;
- x. Updating the public register;
- xi. Carrying out any risk assessment process considered necessary;
- xii. Reviews of decisions or in defending appeals.

17 Pre-Application Advice

17.1 The fee applied to F&P applications may also include a charge for pre-application advice. The F&P application fee will be considered for review after 12-months, if a significant proportion of sites are requesting detailed pre-application advice.

18 Frequency of the Fees

18.1 The Council will require renewal F&P application and charge Fit & Proper application fees every 5 years - the minimum frequency enabled by the Regulations.

18.2 The Council will review if any annual fee(s) are to be implemented to specific sites after 12-months of the Regulations coming into force in October 2022.

19 Fee Review

- 19.1 The F&P Application fee and the option to levy Annual fees will be reviewed after 12-months of the legislation coming into force.
- 19.2 The fee review will include a review of the following:
- i. A review of the accuracy of charges levied - The actual time and resources spent assessing F&P applications.
 - ii. Any surplus or deficit charges of fees. The guidance requires discrepancies from previous years to be levelled with site owners upon renewal of F&P – where they have been over or under charged.
 - iii. Review of additional costs incurred delivering the service, whether these have been significant and/or whether an annual fee is required for specific sites.

20 F&P Application Fee Calculation

- 20.1 The Council will follow its corporate fee setting policy/methodology and have full regard to the prescribed legislation/guidance. The fee has been calculated by estimating the probabilistic time spent processing applications by the number of named persons in each F&P application related to a site. Each named person requires several documents to be assessed against the application form itself. It is envisioned that this method will be the most accurate to estimate and in addition the fairest method to site owners alike. Increasing named relevant persons in each application is akin to increased time spent assessing such applications. This should result in a higher fee that is reflective of sites with multiple named persons in a F&P application. The fee is calculated per relevant person for inclusion on the register and as such sites with multiple named persons for inclusion on the register will be calculated by multiplying the fee amount for each applicant by the number of applicants. When the F&P fee is reviewed, time recording data will be analysed to ensure the actual time spent processing applications is equal to the probabilistic estimations of likely time spent assessing F&P applications in relation to the elements in paragraph 16.1.
- 20.2 To assess the F&P application fee the legislation requires the Council to have considered to the following areas:
- The Council may fix different fees for different cases or descriptions of case. The time taken to assess F&P applications may vary in consideration of the type and number of responsible and/or relevant person(s) who are making an application. Applications made in the name of multiple persons will take longer to process due to the additional checks required – such as multiple Directors, managers, personnel and stakeholders.
 - The Council may calculate F&P fees to account for specific activities listed in the guidance and in paragraph 16.1.
 - The Council must act in accordance with its published fees policy. The fees have been constructed in line with the Councils published fees policy.

- The Council may determine that no fee is required to be paid in certain cases or descriptions of case. No fee will be applied only to exempt relevant sites – such as those controlled by non-commercial family-occupied sites.
- The Regulations require the Local Authority to establish, publish and keep up to date a register of persons they are satisfied are fit and proper persons to manage protected sites in their area, ensuring a fee is charged to applications for inclusion on the register. The fit and proper application fee will be reflective of this requirement.
- Where the local authority have, with an occupier's consent, appointed a person to manage a site, the local authority may recover from the occupier the reasonable costs incurred or to be incurred in making the appointment. It is envisioned this will be a last resort for the Council after informal and formal enforcement has been made.

20.3 The fees will be reviewed annually to ensure they reflect any changes.

21 F&P Policy

21.1 The new Regulations require a policy to be published regarding F&P applications that is approved by the Licensing Committee and Executive. This has been inaugurated into the updated caravan site licensing fee policy seen in Appendix 1.

21.2 The new Regulations require the F&P fee to be approved by the Licensing Committee and Executive. The fees for assessing F&P applications are attached to this report in Schedule 1.

21.3 The legislation provides a mechanism for the Council to review its fees and, where they do so, must publish the revised policy.

22 Consultations

22.1 The Government consulted local authorities regarding the imposition of The Mobile Homes Requirement for Manager of Site to be Fit and Proper Person (England) Regulations 2020 proposed charges to caravan site licensing legislation. Guildford Borough Council along with 21 other Councils made constructive representation.

22.2 The requirements that these Regulations impose on the Council are statutory and therefore public and/or stakeholder consultation is not appropriate.

22.3 There is no requirement to consult with site owners or homeowners on setting fees, but a local authority may consider doing so. The fee will be set in line with the Corporate fee setting methodology and only account for time spent delivering the service and processing each application. As such, consultation in relation to a fee level is not proportionate. For the Council to comply with its duties to fulfil the legislation, if the recovery of costs incurred were not charged in the form of a fee, the cost of the service would have to be subsidised by Council taxpayers.

23 Equality and Diversity Implications

- 23.1 There may be circumstances where Officers will be dealing with responsible persons/parties for whom English is not their first language or have a hearing or visual impairment. In such circumstances Officers will ensure that applications are translated and/or the legal requirements and consequences of non-compliance are fully understood. Where necessary appropriate translation services will be used to ensure the requirements are fully understood.

24 Financial Implications

- 24.1 Where a fee becomes overdue for payment, the council may apply to a residential property tribunal for an order requiring the licence holder to pay the council the amount due by the date specified in the order. If the licence holder has still not paid the fee within three months from the date specified in the order, the council may apply to the tribunal for an order revoking the site licence. Noncompliance with the F&P Regulations may also result in a level 5 fine (up to £5,000) being issued by the courts upon prosecution of a noncompliant site - after full investigation by the Council.
- 24.2 F&P applications will be assessed within the current resourcing within Regulatory Services (Private Sector Housing). The F&P applications will be received every 5 years and only at these points in time will resources be required to deliver the service. Upon renewal application (around 2026) Case Services Officers will be trained to receive the F&P applications in 2026 and the fee reviewed and adjusted to account for this; This will reduce the Regulatory Services resources required to assess each application, as Case Services Offices will undertake the initial receipt and checking of F&P applications.
- 24.2 The F&P applications with conditions (if any are entered onto the register with conditions attached) will require follow up and compliance checking. Regulatory Services will utilise the new Future Guildford model and train Compliance Officers to undertake this element of work, along with and supported by Private Sector Housing Officers. An annual fee may then be levied against such sites with conditions applied to their entries on the register which will recover the costs of any enforcement visits and repercussions. The initial fee for inclusion on the F&P register cannot be inclusive of enforcement and cannot generate a profit to the Council.

25 Legal Implications

- 25.1 The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 sets out the framework for site licence holders or persons appointed to manage relevant protected sites in England to provide the Council with a fit and proper person test application for inclusion on a public register. The framework set out in the Regulations include:
- i. Powers for local authorities to charge fees in respect of “relevant protected sites” unless exempted, for considering applications to be included in a fit and proper register and for the administration and monitoring of the fit and proper person test.

- ii. Powers to appoint a person to manage a site with the site owner's consent and recover costs they incur, or which will be incurred, in appointing a person to manage a site.
- iii. Powers to attach conditions to an entry on a register. The conditions may include those that require additional payments to be made to the local authority by way of annual fee.
- iv. That fees must be reasonable, that the authority must prepare and publish a fees policy before they can charge a fee and that an authority may revise their fees policy and, where they do so, they must publish the revised fee policy.
- v. When fixing the application fee and deciding the amount and frequency of additional payments by way of annual fee, the local authority;
 - i. Must act in accordance with their published fees policy;
 - ii. May fix different fees for different cases or descriptions of case;
 - iii. May determine that no fee is required to be paid in certain cases or descriptions of case.

25.2 A person guilty of an offence to which the new Regulations apply is liable on summary conviction to an unlimited fine (level 5), set by the courts by way of a local authority perusing a prosecution for noncompliance with the Regulations.

25.3 All legal enforcement action will be taken in accordance with the Council's adopted regulatory enforcement policy and case consultation with the Council's legal department.

26 Relevant Offences

26.1 An occupier of land may not cause or permit any part of the land to be used as a relevant protected site unless the relevant local authority:

- i. Are satisfied that the occupier is a fit and proper person to manage the site,
- ii. Are satisfied that a person appointed by the occupier to manage the site is a fit and proper person to do so,
- iii. Have, with the occupier's consent, appointed a person to manage the site.
- iv. Are satisfied the land is not used as a non-commercial family-occupied site.

26.2 An applicant commits an offence if the applicant:

- i. Withholds information from a registration application,
- ii. Includes false or misleading information in a registration application.

26.3 An occupier of land commits an offence if the occupier fails to comply with a condition imposed on the F&P registration application, removal or variation.

27 Human Resource Implications

- 27.1 There are human resource implications as a result of this legislation. As many as 50 applications will need to be processed by case services and/or Private Sector Housing Compliance Officers. All applications will need to be assessed on a case-by-case basis by Officers. Case services will need full training before this function can be transferred and will be aligned with the current Future Guildford transition procedure(s).
- 27.2 It is predicted that each application will vary in its complexity and in turn the length required to process and the assess it, due to the mixed nature of individual sites across the Borough.
- 27.3 The work captured by this new statutory function will be fed into the Service Plan for Environment and Regulatory Services to enable the 5-yearly influx of renewal applications to be appropriately prioritised and resourced.

28 Summary of Options

- 28.1 The Council has a statutory duty to enforce and comply with the provisions in The Mobile Homes Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020. The Executive has two decisions:

1. To adopt or reject the F&P Policy – Specifically;

- a) Adopt the F&P policy in Appendix 1.
- b) Reject the F&P policy in Appendix 1.
- c) Adopt the F&P policy in Appendix 1 - in an amended form.

And/Or...

2. To adopt or reject the F&P proposed fee; - Specifically;

- a) Adopt the F&P proposed fees in Schedule 1.
- b) Reject the F&P proposed fees in Schedule 1.
- c) Adopt the F&P fees in Schedule in – in an amended form.

29 Conclusion

- 29.1 The new legislation adds to the tools that exist to regulate relevant protected caravan sites, ensuring relevant/responsible persons are fit and proper to undertake site management - Ultimately helping improving standards and compliance. It is expected that the majority of site managers/owners/occupiers in the Borough will meet their obligations and responsibilities and make a full and valid F&P application and remain in compliance with any conditions it may impose. Where there is non-compliance, officers will continue to use a combination of informal and formal means to secure compliance in accordance with the Council's Regulatory Enforcement Policy.

30 Background Papers

[The Mobile Homes \(Requirement for Manager of Site to be Fit and Proper Person\) \(England\) Regulations 2020](#)

[Mobile homes: a guide for local authorities on the fit and proper person test - GOV.UK \(www.gov.uk\)](#)

[Mobile homes: a fit and proper person test for park home sites: Summary of consultation responses and Government response](#)

[Corporate Regulatory Enforcement Policy](#)

31 Appendices

Appendix 1: Caravan Site Licensing Fee Policy 2021

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APPENDIX 1

Caravan Site Licensing Fee Policy

Scope/Purpose

This policy sets out the fee structure for the processing of applications for the issue, variation/transfer of caravan site licences, annual fees for administration, monitoring of site licences and Fit and Proper Person assessments, together with the fee for holding a register of site rules.

Relevant Legislation

The provision for charging fees was introduced by the Mobile Homes Act (MHA) 2013. The parts of the Act amending the Caravan Sites and Control of Development Act 1960, which is the principal legislation covering the licensing and control of caravan sites, came into force on 1 April 2014. The Act came into effect on 26 May 2013 with respect to amendments to the Mobile Homes Act 1983, which regulates the agreements between site owners and occupiers. The Mobile Homes Requirement for Manager of Site to be Fit and Proper Person (England) Regulations 2020 has amended the MHA 2013 and places new duties on site owners and managers.

The Licence Fee Structure

The annual fee includes all administrative costs in ensuring that each site complies with the site licence conditions. It does not include any costs associated with enforcement action, as these must be recovered separately under a demand for recovery notice.

Exemptions

The licence fee requirement does not apply to the following sites:

- i. Sites for holiday use only
- ii. Sites where conditions require that there are times of the year when no caravan may be stationed on the land for human habitation
- iii. Sites that are occupied only by the site owner and his/her family or by a person employed by the site owner except where under an agreement to which the Mobile Homes Act 1983 applies.

Calculation of licence fees

In setting its fees policy and the fees to be charged, the council has had regard to the Councils corporate fee charging procedure and the Guide for Local Authorities on Setting Site Licensing Fees issued by the Department for Communities and Local Government (2014).

In determining those fees, the council has taken into account administrative costs incurred in the licensing process, officer visits to sites, travel costs, consultations, meetings,

monitoring of sites/investigation of complaints and the giving of informal advice. The charges are set out in Schedule 1.

Payment

Once a fee policy has been published, the Council requires application fees to accompany any application in relation to a new site licence, Amending a site licence, Fit and proper persons tests, Fit and proper annual fees or for transferring a site licence. The council will not commence the application process until the fee is received.

Once a fee policy has been published, The Fit and Proper Regulations state that a local authority is not required to consider an application for entry on the register unless that application is accompanied by the correct fee. If the correct fee is not paid, the application will not be valid and the site owner could be in breach of the Regulations.

Refunds

Application fees are not refundable if the application is not approved, or if a decision is delayed. All application & Annual fees are not refundable unless in exceptional circumstances and are at the discretion of the Director of Service Delivery or Officers authorised to act on their behalf.

Fit & Proper fees will become due every 5-years starting on 1st October 2021.

Fit & Proper Annual fees, (where applicable) will become due on 1 October 2022. The request for payment will be accompanied by information detailing what matters the council took into account in fixing the annual fee and the extent to which it had regard to deficits and surpluses from the previous year.

Site licence Annual fees, (where applicable) will become due on 1st April. The request for payment will be accompanied by information detailing what matters the council took into account in fixing the annual fee and the extent to which it had regard to deficits and surpluses from the previous year.

Where a fee becomes overdue for payment, the council may apply to a residential property tribunal for an order requiring the licence holder to pay the council the amount due by the date specified in the order. If the licence holder has still not paid the fee within three months from the date specified in the order, the council may apply to the tribunal for an order revoking the site licence.

Review

The policy for fee calculation will be reviewed periodically to assess any changes that need to be made. However, the fee levels can be reviewed, each year to take into account the effect of inflation and any surpluses or deficits incurred on the predicted level of expenditure in the previous year.

In setting annual fees each year the council will inform the site owner of the extent to which they have had regard to any surpluses/deficits from the previous year and will confirm to the site owner the annual fee for the forthcoming year.

Other Charges

Fit and Proper (F&P) Persons Testing

All provisions in The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020, as enabled by the MHA 2013, will come into force by 1st October 2021.

The Regulations will, unless an exemption applies, makes it an offence for a site owner to manage a relevant protected site if the Local Authority does not consider them to be a fit and proper person.

A site owner under the *Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 (SI 2020/1034)* (“the Regulations”) must apply to their local authority for the relevant person (themselves or their appointed manager) to be added to the register of fit and proper persons managing sites in their area (“the register”).

The site owner may only apply to be added to the register if they hold, or have applied for, a site licence for the site. This provision also applies where the site owner or site manager is a registered company.

The Regulations permit the local authority to determine the fee for an application or registration for someone to be added to the register. It is imperative that the fee is included with the application and failing to include this may mean that the site owner is in breach of the requirements of the Regulations.

Site owners will be required to submit a completed application from 1 July until October 2021. Fees will become chargeable (which will also include any additional fees such as an annual site fee) once the fee(s) are approved.

A site is exempted from a fee only if it is occupied by members of the same family and is not being run as a commercial residential site.

The Secretary of State has published guidance for Local Authorities in relation to the charging of Fit and Proper applications fees. Local Authorities must consider the following points in deciding the level and frequency of fee...

- i. Must act in accordance with their published fees policy;
- ii. May fix different fees for different cases or descriptions of case; and
- iii. May determine that no fee is required to be paid in certain cases or descriptions of case.

The Council will require application and charge Fit & Proper fees every 5 years (from enactment of the Regulations), the minimum frequency enabled by the Regulations.

The Council will apply different fees for different cases/descriptions of cases. A higher fee will be charged for F&P applications containing multiple named personnel, due to the increased checks that will be required – as seen in Schedule 1.

Fee Calculation

The local authority will take into account the following matters on which costs are incurred, or likely to be incurred, when determining its fee policy for consideration of applications for entry on a fit and proper person register:

- (a) Initial enquiries;
- (b) letter writing/ telephone calls etc to make appointments and requesting any documents or other information from the site owner or from any third party in connection with the fit and proper process;
- (c) sending out forms;
- (d) updating files/ computer systems and websites;
- (e) processing the application fee;
- (f) land registry searches;
- (g) time for reviewing necessary documents and certificates;
- (h) preparing preliminary and final decision notices;
- (i) review by manager or lawyers; review any representations made by applicants or responses from third parties;
- (j) updating the public register;
- (k) carrying out any risk assessment process considered necessary and
- (l) reviews of decisions or in defending appeals.

It is important that charges must be limited to recovering the costs of exercising the fit and proper person test function only.

Please see Table 2 found in Schedule 1 (also referring to the note) which outlines the above and provides transparent justification for the fee to be imposed upon receipt of the initial application. The purpose of this table is to demonstrate that the fees imposed are fair and transparent providing justification as to why a site is required to pay a specific fee.

The fee has been calculated by estimating the probabilistic time spent processing applications by the number of named persons in each F&P application related to a site. Each named person requires several documents to be assessed against the application form itself. It is envisioned that this method will be the most accurate to estimate and in addition the fairest method to site owners alike. Increasing named relevant persons in each application is akin to increased time spent assessing such applications. This should result in a higher fee for sites with multiple named persons in a F&P application. The fee is calculated per relevant person for inclusion on the register and as such sites with multiple named persons for inclusion on the register will be calculated by multiplying the fee amount for each applicant by the number of applicants.

After 12 months of the Regulations coming into full effect, the Council will review the application fees. This review will include a review of the available data relating to actual officer time spent assessing fit and proper applications.

Full and valid applications will be assessed as soon as is practicable. The Council will aim to issue a final decision within 3 months of a full and valid F&P application – although in some instances it may take longer.

Assessing F&P Applications

Applications must be deemed full and valid. A full and valid application consists of...

- i. The Guilford Borough Council application form fully completed (including all required signatures).
- ii. Provision of a DBS certificate dated within 6 months of application – for each named relevant person.
- iii. Proof of interest in the land; Lease agreement for leaseholders and a land registry search for landowners.
- iv. Provision of a satisfactory management plan that may consist of but is not limited to; Documented procedures (such as complaints procedures) and management reporting lines.
- v. Provision/evidence of satisfactory financial arrangements and funding sources.
- vi. Full & correct payment made at the same time as the application form is submitted.

Missing Information

Where missing information is identified in applications, applicants will be written to informing them that more information is required to class the application full and valid. If the satisfactory provision of missing information is not supplied within 28 days of the Council sending such a missing information letter/communications, the Council will refuse the application and inform the applicant(s) of this decision.

Register

The Regulations also require the Local Authority to establish, publish and keep up to date a register of persons they are satisfied are fit and proper persons to manage protected sites in their area, enabling a fee to be charged for applications for inclusion on the register. The fit and proper application fee will be inclusive of this.

F&P Decisions

Fit & Proper applications may be granted unconditionally or with conditions. Making a F&P application assessment includes both considering an application for inclusion on the F&P register and also deciding whether it is appropriate to apply conditions to the F&P applicant(s) of the site. Applying conditions to any site will be made in consideration of the legislation/guidance, the information within the F&P application, consultation with other local authorities, supplementary documents and the sites history of compliance with the F&P Regulations/site licence.

It is important to note that there is no prescribed standard or criteria that sites must meet to be accepted as fit and proper. Decisions will be made on a case-by-case basis in review of all documentation provided, the guidance and legislation.

Refused Applications

Applications will be refused where the F&P application is missing information, and the site owner does not supply the required documentation/information within 28 days of being notified.

Refusals are likely to be issued where the information provided identifies serious/significant and/or obvious challenges to effective management based on the evidence within the application form. Refusal decisions may be made on the basis of significant concerns regarding effective funding arrangements, management arrangements, personnel or anything else that is prescribed in the Regulations.

Appointed Manager Fee

This is where the local authority is provided with the site owner's consent to appoint an individual to manage a site. This may occur where an application or specific named personnel in the application have been refused. The costs associated with this should be reasonable and are recoverable from the site owner.

Additional Fees (Annual Fit & Proper Fee)

The Council will not consider charging an annual fee to relevant sites until after the Regulations have been in force for a minimum of 12 months. The annual fee is only to be charged based on additional Council time spent delivering the F&P service and will only be charged to sites with conditions attached to their F&P application. After 12-months of the Regulations coming into full effect, the Council will be aware of sites that have conditions attached to their F&P application and will therefore be able to charge for this additional resource in 2022-2023 – as seen in Schedule 1. The Council will consider if an annual fee is proportionate to the nature & number of conditions applied on a case-by-case basis.

The Fit & Proper Application fee and the option to levy Fit & Proper Annual fees will be reviewed after 12-months of the Fit & Proper legislation coming into force.

The annual fee must be set as a condition to any entry being added to the register. The condition should state the amount and date by which the annual fee payment is due, also stating that failure to make such payment will be a breach of the condition and may lead to legal proceedings being issued.

Revising Fit and Proper Fees

The local authority may revise its fees policy and will be required to publish the revised policy. The Council will review its Fit and Proper fees policy and fee periodically from the date the Regulations come into full effect.

The items that can be included in calculating the application fee and annual fee are set out in the published guidance and legislation.

The revision of fees in line with inflation will be undertaken annually and will not require republishing of the fit and proper person fee policy.

Fit and Proper Conditions

Applying conditions to any site will be made in consideration of the application, supplementary documents and the sites history of compliance with the F&P Regulations and its site licence. F&P conditions imposed on relevant applications may also be varied, where circumstances change.

The Fit and Proper test is aimed at ensuring that the person managing the site is competent to do so. Conditions set against any application shall relate to the person's ability to secure the proper management of the site. The factors that will be considered are;

- i. The relevant person's competence to manage the site.
- ii. The management structure or funding arrangements for the site.
- iii. An associated person's influence.
- iv. Any other relevant factors.

The Council will assess whether to grant with/without conditions or refuse each application on a case-by-case basis and based on the above points by examining the information in the F&P application form and documentation that must accompany the F&P application.

Amending conditions attached to an entry on a register

The Council may alter the conditions attached to an entry on a register (by adding new conditions or changing or deleting existing ones), following a review. The local authority must notify the site owner of its interim decision (except in the case where it is deleting a condition) and consider any representations made by the site owner, before reaching a final decision. If the site owner is unhappy with the decision to alter, or not to alter, the conditions, they will have a right of appeal to the First-tier Tribunal (Property Chamber).

There are no requirements for a site owner to make an application for a condition to be altered. Any costs involved with amending existing conditions, or adding new conditions to an entry, must also be factored into the cost of calculating the annual fee.

Enforcement

Local authorities are responsible for enforcing the Regulations. A site owner found guilty of any of the above offences will be liable on summary conviction to a level 5 (unlimited) fine.

The Council will follow its enforcement policy and consult the guidance/legislation and the internal legal department prior to enacting any formal enforcement proceedings. Enforcement proceedings will be taken on a case-by-case basis.

Enforcement Expenses

The Council will recover expenses incurred in carrying out enforcement action involved in the service of a compliance notice. These expenses include costs incurred in deciding

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whether to serve a notice, site inspections, preparing the notice and obtaining expert advice.

Where appropriate, we will also seek to recover expenses incurred:

- In taking action following conviction of the site owner for failure to carry out actions required by a compliance notice; or
- In taking emergency action where there is an imminent risk of serious harm to any person on the site as a result of the site owner's failure to comply with licence conditions.

Interest may be charged on any sums to be recovered because of enforcement action. The Council will also be able to register any of the debts to be recovered for enforcement actions as a local land charge against the site.

Schedule 1: New and Revised Fees Charged related to Caravan Sites

Table 1: Caravan Licensing Annual Fee

Caravan Licensing - Annual	Environmental Health Officer	Environmental Health Officer	Environmental Health Officer	Environmental Health Officer
Step	No of Pitches 1-5	No of Pitches 6-15	No of Pitches 16-45	No of Pitches 46+
History Check	0:30:00	0:35:00	0:45:00	0:45:00
Booking Inspection	0:05:00	0:05:00	0:05:00	0:05:00
Travel to and from (average)	0:40:00	0:40:00	0:40:00	0:40:00
Inspection / Site Visit	0:30:00	0:45:00	1:15:00	2:00:00
Completion of inspection scoring in Tascomi	0:05:00	0:05:00	0:05:00	0:05:00
Creation of post inspection letter (average)	1:30:00	1:30:00	1:30:00	1:30:00
Follow up correspondence to check compliance	0:15:00	0:15:00	0:30:00	0:30:00
Follow Up Inspection Inc travel time	0:45:00	1:00:00	1:30:00	1:30:00
Post Inspection correspondence & Update Tascomi	0:30:00	1:00:00	1:30:00	1:30:00
Creation of Debtors Form	2:00:00	2:00:00	2:00:00	2:00:00
Visit Frequency	5	4	3	2
Total time	1:22:00	1:58:45	3:16:40	5:17:30
Average Hourly rate	£62.88	£62.88	£62.88	£62.88
Fee	£85.94	£124.45	£206.11	£332.74
Grand Total:	£85.94	£124.45	£206.11	£332.74
Proposed Fee	£86.00	£124.00	£206.00	£333.00

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Table 2: Caravan Licensing - Fit & Proper – Application & Inclusion on the F&P Register Fee

Note: Fees will be charged per relevant person for inclusion on the register. I.e: 5x applicants will be charged 5x the application fee for 1x named person.

Caravan Licensing - Fit & Proper	Environmental Health Officer
Step	1 named person
Receipt of fee and checking of applications.	01:00:00
Enter onto Tascomi	00:30:00
acknowledgement letter	00:15:00
Consulting with other LA's	00:30:00
Inclusion on register & issuing Decision Notices	01:00:00
Total time	03:15:00
Average Hourly rate	£62.88
Fee	£204.36
Grand Total:	£204.36
Proposed fee	£204.00

Table 3: Caravan Licensing - Fit & Proper - Annual Fee (Where Applicable)

Caravan Licensing - Fit & Proper	Environmental Health Officer 1x Condition	Environmental Health Officer 2x Conditions	Environmental Health Officer 3+ Conditions
Step			
Letter writing/ telephone calls etc to make appointments and requesting any documents	00:15:00	00:30:00	00:30:00
Updating files/ computer systems	00:15:00	00:30:00	00:30:00
Processing the annual fee	00:30:00	00:30:00	00:30:00
Reviewing necessary documents	00:30:00	00:45:00	01:00:00
Preparing reports on breaches or confirming compliance	00:30:00	00:45:00	01:00:00
Reviewing any representations	00:30:00	00:45:00	01:00:00
Time spent on consulting the site owner	00:30:00	00:45:00	00:45:00
Officer Site Visits	00:30:00	00:45:00	01:00:00
Total time	03:30:00	05:15:00	06:15:00
Average Hourly rate	£62.88	£62.88	£62.88
Fee	£220.08	£220.08	£220.08
Grand Total:	£220.88	£330.12	£393.00
Proposed fee	£221.00	£330.00	£393.00

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Executive Report

Ward(s) affected: All

Report of Director of Resources

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Date: 4 January 2022

Universal Basic Income (UBI)

Executive Summary

At the Council meeting on 13 April 2021, following consideration of a motion submitted by Councillor Steven Lee, the Council agreed to ask the Executive to consider the following action:

- (1) To engage with our local UBI lab in order to seek government funding for a pilot UBI trial in Guildford.
- (2) To call upon the government to fund UBI trials across the UK and to support trials of UBI in Guildford now and that the findings of these trials be published and used to assess the best way to implement financial security for every family.
- (3) To write a letter signed by the Leader of the Council and all leaders of the Groups on the Council choosing to support this motion and address it to: the Prime Minister; the Secretary of State for Work and Pensions; the Chancellor of the Exchequer; the leaders of all opposition parties in Parliament; all Surrey MPs and the media.
- (4) To send the aforementioned letter, accompanied by this motion to addressees and ask in it for a trial of Universal Basic Income in Guildford to be urgently established and funded by Government.

This report provides further information on what Universal Basic Income (UBI) is, the consideration of UBI at government level to date and what the purpose of UBI labs are.

The report finds that national UK government has considered the proposal of UBI in a parliamentary debate following a petition and has decided not to progress any pilot schemes at present. In responding to the debate, the parliamentary under-secretary of state for work and pensions responded that replacing universal credit with UBI would be of little benefit. Various reports and research has been conducted in the UK on UBI so far but the conclusions have not evidenced substantial benefits of implementing UBI above and beyond that which could be achieved through increasing allowances within the existing benefit system. The

purpose of engaging with and undertaking a UBI pilot would be to try to gather evidence to assess the costs and benefits of implementing UBI.

If UBI were to deliver the benefits which supporters of the scheme are aiming for then the Council will be contributing towards helping to achieve a number of its corporate priorities related to community. However, these priorities could also be achieved by asking government to consider other reforms (such as increasing allowances and improving access) to the existing benefit system.

Recommendation to Executive:

The Executive is asked to consider the information contained in the report and decide if it wishes to:

- (a) carry out the actions detailed in the motion, in particular to send the letter proposed in Appendix 2 (with or without amendment) to various parties and engage with the local UBI lab or,
- (b) to send a revised letter asking government to consider reforms to the existing benefit system such as increasing allowances and improving access to the system to reduce poverty, in particular child poverty
- (c) do nothing

Reason for Recommendation:

To respond to the motion adopted by the Council on 13 April 2021.

Is the report (or part of it) exempt from publication? No

1. Purpose of Report

- 1.1 To enable the Executive to consider whether to undertake the actions put forward in a motion adopted by the Council on 13 April 2021.

2. Strategic Priorities

- 2.1 A key corporate priority within the Council's Corporate Plan 2021-2025 is to tackle inequality in our communities, to work with communities to support those most in need and to support the unemployed back into the workplace.

3. Background

- 3.1 At the Council meeting on 13 April, following consideration of a motion submitted by Councillor Steven Lee, the Council agreed to ask the Executive to consider the following action:
 - (1) To engage with our local UBI lab in order to seek government funding for a pilot UBI trial in Guildford.
 - (2) To call upon the government to fund UBI trials across the UK and to support trials of UBI in Guildford now and that the findings of these trials be

published and used to assess the best way to implement financial security for every family.

- (3) To write a letter signed by the Leader of the Council and all leaders of the Groups on the Council choosing to support this motion and address it to: the Prime Minister; the Secretary of State for Work and Pensions; the Chancellor of the Exchequer; the leaders of all opposition parties in Parliament; all Surrey MPs and the media.
- (4) To send the aforementioned letter, accompanied by this motion to addressees and ask in it for a trial of Universal Basic Income in Guildford to be urgently established and funded by Government.

- 3.2 This report sets out background information to aid the consideration of the actions requested so that the Executive can make a decision as to how it wishes to proceed.

What is Universal Basic Income (UBI)?

- 3.3 Universal Basic Income (UBI, Citizens' Basic Income – CBI, or simply Basic Income) is an idea where a regular cash payment is made to every individual adult, without any reference to their other income or wealth and without any conditions. The core aim of the proposal is to reduce or eliminate poverty. Payment amounts can vary according to broad demographic characteristics, such as a different payment for working-age adults, children, and pensioners. The Welsh Government has committed to trialling it, the Scottish Government has invested in the feasibility of pilots, several English cities are keen to test it out and have written letters in support of holding pilots in their areas and a number of political parties included UBI trials in their election manifestos.
- 3.4 Most modern UBI proposals include two features, (in contrast to some earlier proposals which intended to replace all benefits with UBI or introduce UBI without accompanying tax changes). The main feature is that each adult individual would receive a flat basic income payment from the government; however, this flat basic payment would then be enhanced by a system of benefits linked to costs. Most researchers propose that a system of flat payments alone could not offer adequate support with varying costs of housing, childcare, or disability. This means that there would continue to be a degree of complexity and means-testing of benefits if UBI was introduced (sometimes known as UBI+). The second feature is that UBI would replace parts of the tax system as well as the social security system. Most likely, the tax-free personal allowance would be removed, so people would pay tax on the entirety of their earned income. Depending on the design, many on lower-to middle-incomes would more than recoup this through the universal basic income payment.

Advantages and Disadvantages of UBI

- 3.5 UBI is proposed by supporters as a system which provides a level of economic security to everyone and destigmatises the social security system by ensuring that people are not locked out of the support they need or do not have to go

through a means-tested application process. It is seen as a method to address issues that are perceived with the existing social security system such as:

- non-take up of existing benefits and support due to the 'stigma' of being on benefit, lack of awareness of entitlement to benefit, mistakes in applications and processing leading to underpayments and general perceived unpleasantness of the system (such as stress and uncertainty caused by means testing)
- perceived inadequacies in existing systems for maternity, paternity, training support and sick pay; e.g., to address differences in access to more generous occupational schemes and those who only have access to statutory schemes
- people dropping out of the system (e.g., due to health / mental health reasons, conditions, or treatment)
- sanctions within the existing system
- delays, errors, and processing issues which can lead to delay in payments
- job insecurity and low pay

In addition, some supporters argue that the additional benefits of UBI is that it will reduce the level of state involvement in people's lives, reduce bureaucracy, offer mental and physical health benefits by improving the stability and security of people's income and be a fairer redistribution of wealth. It is seen as a method to significantly cut poverty, particularly child poverty.

3.6 People who do not support UBI point to the following criticisms of the proposals and point out the existing arrangements in place for social security benefits in the UK as follows:

- There is already in place legislation around the minimum wage which is intended to try to ensure that all employed people have sufficient income to live on.
- There is existing legislation around statutory sick, paternity and maternity pay to ensure people who are not working for those reasons continue to receive a basic level of income
- There is an existing system of 'universal credit' which is designed to support those people not in employment and top up income levels for those that are employed where additional help and support is needed (e.g., for housing costs, children or those with disabilities and long-term health conditions)
- UBI does not target those most in need – e.g. 'rich' people as well as 'poor' people would receive the basic income level regardless of their other income or wealth
- UBI is perceived as 'expensive' and would require higher taxes in comparison to the existing benefit system
- UBI is perceived as something which would not incentivise people to work where they can
- UBI undermines the duties of employers to pay wages that reflect living costs

3.7 A core issue with any UBI proposal is the level at which the UBI is set. Any system design will need to consider whether the level of basic income is set at or

just above current benefit levels or higher (e.g., at the 'living wage' or at the 'minimum income standard' or higher). It is the level of the UBI that will determine whether the benefits of having a UBI meet the core aim of reducing poverty and will determine whether the cost of the UBI scheme is higher or lower than the existing benefits system and therefore would require an increase in taxation or not. For information, a simple core basic comparison is set out in the table below (figures have been converted from monthly amounts):

	Standard weekly allowance / wage for adults aged 25 or over
Universal Credit	£74.75 for an individual £117.35 for a couple
National Living Wage	£311.85 (before tax based on a 35 hour working week and a rate of £8.91 p/hr)
'Real' Living Wage (from the Living wage foundation)	£346.50 (before tax based on a 35 hour working week and a rate of £9.90)
Some UBI proposals	£89 to £100 per person

- 3.8 In addition to the universal credit standard allowances, if an individual or couple have between 1 and 3 children then an additional amount of £54.56 per child per week is payable (however, there is no additional allowance for more than 3 children) and further allowances are payable to adults and children with disabilities. Further help is also available for people on universal credit to help with rent and some service charge costs up to a maximum amount.
- 3.9 It is worth noting that the existing welfare benefit system is complex to enable the system to deal with a significant variety in household and individual circumstances. In order for UBI to work without additional means tested supplements it may be that the UBI will need to be set at a level significantly in excess of the real living wage.

Current UK government policy position and political debates on UBI

- 3.10 The current UK government does not have currently have any proposals to conduct trials of UBI in the UK despite requests to do so. Over recent years there have been a number of policy reports and debates in Parliament about UBI.
- 3.11 Following a petition to the UK Parliament, a debate was held on Tuesday 13 October 2020 which considered the advantages and disadvantages of introducing UBI in the UK. However, the motion to consider trials of UBI in the UK lapsed when the Parliamentary Under-Secretary of State for Work and Pensions responded to the motion that replacing universal credit with UBI would be of little benefit. The petition was previously considered by the Parliament Petitions Committee on 17 September 2020. In order to facilitate the debate on the petition, the House of Commons issued a debate paper which is available from the House of Commons Library and has been attached as **Appendix 1**, the

paper includes reference to the current position of each of the main political parties in the UK on UBI. There are other briefing papers available for example from the Joseph Rowntree Foundation and the Institute for Policy Research as well as many academic research papers from universities in the UK. Some of these papers are referenced with links, in the background papers section of this report and in Appendix 1.

- 3.12 The House of Commons Work and Pensions Committee also published a report in 2017 on Citizens' Income in response to interest in UBI as a solution to issues with the welfare state labour market. The Committee held an evidence session at which arguments for and against the proposals were put forward; however, the Committee concluded that the proposal for UBI was a 'distraction' and that other workable solutions to problems using the existing welfare state and legislative framework could be found.

UBI Trials and 'Laboratories'

- 3.13 UBI Lab is a worldwide network of citizens, researchers, activists, and campaigners who want to promote the exploration and potential of UBI. An individual UBI lab is a citizen led group that is seeking to explore and advocate for UBI in their local area. There are currently 35 UBI labs across the world with the majority based in the UK. The labs meet on a monthly basis to share learning and contribute to a shared set of resources. The labs are supported by a staff team who offer skills, resource, and expertise to facilitate the aims of the lab. The network is supported by Opus, a not-for-profit social enterprise working in culture, politics, and arts. They claim to provide independent information and communication to support active citizenship and community participation.
- 3.14 The first UBI lab was established in Sheffield as a collaboration between multiple organisations and individuals, seeking to explore the potential of a Universal Basic Income and the possibility of a pilot in the city. The lab consists of individuals such as the founder and director of the Centre for Welfare reform, Sheffield Equality group, the founder and director of Opus and various journalists, academics from the University of Sheffield and freelance researchers.
- 3.15 The aim of running pilot schemes is to assess whether UBI is the means to provide welfare state reform. The pilot schemes aim to provide evidence to support whether the idea of UBI would seek to achieve the proposed aims, support discussion, and increase public awareness of the tax and benefit system. UBI pilot schemes claim that they will immediately reduce poverty and improve well-being for many of the participants involved in the pilot scheme.
- 3.16 A UBI lab has been established in Surrey but there is very little public detail on the UBI lab network about the local organisation. There is also a UBI lab Guildford, but it is currently unclear whether this is part of the Surrey lab network or a separate network. Unlike other UBI Labs (for example in Sheffield) the details of the individuals who are part of the lab are not currently public.
- 3.17 According to the UBI lab network website the network is actively lobbying local councils to pass motions in support of basic income pilots in their area. The

network is doing this as it believes that councils calling for UBI creates political legitimacy for the idea as well as generating press coverage. Its website includes a video message to councillors detailing why they should back basic income and a 'guide on how to get your council to pass a motion in support of a basic income pilot'. The content of the guide sets out how to undertake local political lobbying of councillors and local media campaigning.

- 3.18 The UBI lab network will undertake a feasibility study into what a UBI pilot or micro-pilot will look like in the area and design pilots which respond to the social, economic and environmental issues faced by people in the local area.

Actions proposed in the Motion

- 3.19 The first item from the Council motion asks the Executive to consider engaging with our local UBI Lab in order to seek government funding for a pilot UBI trial in Guildford.
- 3.20 The second, third and fourth actions from the motion ask the Executive to consider calling upon the government to fund UBI trials across the UK and to support trials of UBI in Guildford, along with writing a letter signed by the Leader of the Council and leaders of all groups on the Council to the Prime Minister, other members of the Cabinet, leaders of all opposition parties in Parliament, Surrey MPs, and the media.
- 3.21 A draft letter has been written by Councillor Steven Lee, who proposed the Council motion. This letter is attached at **Appendix 2**.
- 3.22 Following consideration of this report, the Executive is asked to decide whether it wishes to undertake the actions set out in the Council Motion.

4. Consultations

- 4.1 The Motion was put to Full Council on 13 April 2021 and was debated during which an amendment to the motion was proposed and accepted which asked the Executive to consider undertaking the actions set out in the motion. A recorded vote was undertaken on the amended motion with thirty-six councillors voting in favour, one voting against and seven abstentions.

5. Key Risks

- 5.1 Officers are concerned there is a risk that the resources of the Council are being utilised for the purposes of political lobbying in undertaking the actions proposed by the motion. If political group leaders wish to send the letter, then they should do so either individually or jointly in their capacity as group leaders.

6. Financial Implications

- 6.1 The UBI Lab network proposes that central government should fund any pilot schemes; however, it is unclear whether any pilot scheme would need to be administered locally by the Council given the Council's existing role in administering housing benefit and local council tax support for existing claimants

that have not moved to universal credit and for non-working age benefit claimants. Universal credit is administered by the Department for Work and Pensions, but the roll-out of universal credit to all claimants has been significantly delayed over many years. If there was a requirement to administer the scheme, then there would be a resource impact on the Council.

7. Legal Implications

- 7.1 Council resources should not be used for political purposes and Members should be mindful on this when asking officers to take any further action in relation to this motion.

8. Human Resource Implications

- 8.1 If the Council was required to be involved in administering a UBI pilot scheme then there would be human resource implications for the Council in doing so.

9. Equality and Diversity Implications

- 9.1 Supporting a UBI scheme potentially may have a positive impact on equality and diversity through providing a basic level of income for people (who may currently receive universal credit) without a means test. This may have a positive impact on the mental health and wellbeing of people with protected characteristics. However, the proposals for UBI would still require some additional assessment to access any additional disability or health related allowances on top of the UBI.

10. Climate Change/Sustainability Implications

- 10.1 There are no envisaged impacts on climate change or sustainability.

11. Summary of Options

- 11.1 The Executive is asked to consider the information contained in the report and decide if it wishes to:
- (a) carry out the actions detailed in the motion, in particular send the letter proposed in Appendix 2 (with or without amendment) to various parties and engage with the local UBI lab, or
 - (b) to send a revised letter asking government to consider increasing allowances and resolving issues within the existing benefit system to reduce poverty, in particular child poverty, or
 - (c) do nothing

12. Conclusion

- 12.1 At the Council meeting on 13 April, following consideration of a motion submitted by Cllr Lee, the Council agreed to ask the Executive to consider the action set out in the motion in relation to engaging with the local UBI lab and writing a letter to government calling for a pilot of UBI in Guildford. This report provides further information on what Universal Basic Income (UBI) is, the consideration of UBI at government level to date and what the purpose of UBI labs are.

- 12.2 The report finds that national UK government has considered the proposal of UBI in a parliamentary debate following a petition and has decided not to progress any pilot schemes at present. Various reports and research have been conducted in the UK on UBI so far but the conclusions have not evidenced substantial benefits of implementing UBI above and beyond that which could be achieved through increasing allowances within the existing benefit system.
- 12.3 The purpose of engaging with and undertaking a UBI pilot would be to try to gather evidence to assess the costs and benefits of implementing UBI.
- 12.4 If UBI were to deliver the benefits which supporters of the scheme are aiming for then the Council will be contributing towards helping to achieve a number of its corporate priorities related to community. However, these priorities could also be achieved by asking government to consider other reforms (such as increasing allowances and improving access) to the existing benefit system.

13. Background Papers

Joseph Rowntree foundation [Is Universal Basic Income a good idea? | JRF](#)

Institute of Policy Research [Assessing the Case for a Universal Basic Income in the UK \(bath.ac.uk\)](#)

UBI Lab network [Council Motions — UBI Lab Network](#)

14. Appendices

Appendix 1: House of Commons Debate paper 8 October 2020

Appendix 2: Proposed letter to be sent by the Leader of the Council and political group leaders.

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DEBATE PACK

Number CDP0096, 8 October 2020

The introduction of a universal basic income

By Philip Loft, Steven Kennedy, Andrew Mackley, Frank Hobson

Summary

On Tuesday 13 October 2020 at 9.30 am there will be a debate in Westminster Hall on “the introduction of a universal basic income”. The debate will be led by Ronnie Cowan MP, Neil Gray MP, Clive Lewis MP and Layla Moran MP.

A petition, entitled [Implement Universal Basic Income to give home & food security through Covid-19](#) was considered in an [oral evidence session](#) of the UK Parliament Petitions Committee on 17 September 2020. In [response](#) to the petition, the UK Government said a Universal Basic Income “does not target help to those who need it most”, stressing additional support provided during the coronavirus outbreak, such as the Job Retention Scheme and changes to Statutory Sick Pay and Universal Credit.

The Senedd Cymru/Welsh Parliament [debated Universal Basic Income](#) on 30 September 2020. The accompanying motion, calling for the Welsh Government to establish a Universal Basic Income Trial in Wales, was passed by the Senedd.

A [motion to campaign for a Universal Basic Income](#) was also passed at the Liberal Democrats’ annual conference in September 2020.

The Commons Library previously published a debate briefing on [Universal Basic Income](#) in 2016.

The House of Commons Library prepares a briefing in hard copy and/or online for most non-legislative debates in the Chamber and Westminster Hall other than half-hour debates. Debate Packs are produced quickly after the announcement of parliamentary business. They are intended to provide a summary or overview of the issue being debated and identify relevant briefings and useful documents, including press and parliamentary material. More detailed briefing can be prepared for Members on request to the Library.

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1. Policy Background

1.1 Universal Basic Income

Universal Basic Income (UBI) is a term used to describe a number of different proposals where the state would provide income for all citizens, without any conditions attached, and regardless of their other resources. The idea has a long history and has attracted supporters from across the political spectrum at various times.

There is some debate as to what constitutes a UBI. Some argue that it should be adequate to live on and could replace current social security arrangements. Others [push for more limited schemes](#) which would provide universal payments alongside the existing social security system.¹ The most common broad conception of a UBI scheme is one where **universal payments provide people with just enough money to live on**. This was summed by Annie Lowrey in 2018:

It is universal, in the sense that every resident of a given community or country receives it. It is basic, in that it is just enough to live on and not more. And it is income.²

Both supporters and critics accept that full UBI schemes would be huge and society-transforming undertakings.

In this briefing we summarise the arguments put forward by advocates and opponents of UBI schemes. We also outline a selection of international examples where some form of UBI has been introduced.

1.2 Pros and cons of UBI

Common arguments in favour

- A basic income should be a right of citizenship, providing material and psychological security throughout life
- Changes to the labour market, particularly automation, may make UBI necessary
- National income can be better distributed through UBI in a context where an increasing proportion of national income goes to capital rather than labour
- UBI could reward valuable non-wage labour such as caring and domestic work
- A full basic income replacing the social security system we have today would be simpler to administer and easier to understand
- Government interference in people's lives would be reduced through the removal of features such as means-testing and conditionality

¹ See, for example, New Economic Foundation, [Nothing Personal: Replacing the personal tax allowance with a Weekly National Allowance](#), 11 March 2019

² Annie Lowrey, Give People Money: How a Universal Basic Income would end poverty, revolutionize work, and remake the world, Penguin Random House, 2018, p4

- An independent income stream gives workers freedom to choose other options, take entrepreneurial risks and bargain from a position of power with employers
- UBI removes the risk of high withdrawal rates that claimants of means tested benefits can face as they earn through work
- UBI would provide a quickly accessible infrastructure for comprehensive financial support during crises (such as the current pandemic)

Common arguments against

The most common argument against UBI is cost. A Basic Income of £100 a week for each person over the age of 16 in the UK, and £50 a week for each child, would cost around £314 billion a year.³ To put this in context, total spending on benefits, state pensions and tax credits in the UK was forecast to be around £225 billion in 2019-20.⁴ Payments at this level would nonetheless represent a significant reduction in support for many households currently claiming benefits.

Other arguments against UBI include:

- It would require a huge shift away from established principles of contribution, targeting and lifecycle distribution (linked to changing needs) in the existing social security system
- UBI would not target payments – unlike our current social security system which directs resources towards those who are unemployed, face high housing costs, are parents, or who have disabilities and long-term health conditions
- A UBI would have unavoidable trade-offs in terms of winners and losers. For example, in terms of the level of payment, either;
 - It would pay at a level that creates few losers (in terms of benefit entitlement) compared to the status quo, but at huge cost requiring higher taxes; or
 - It would pay at a lower level, resulting in a significant proportion of the people who currently claim social security benefits losing out; or
 - It would pay at a lower level but sit alongside other targeted benefits – replicating or retaining the complexity and problems of the current system
- It could undermine the responsibility of employers to pay wages that reflect living costs
- There are no conditions for receiving UBI, so it could reduce the incentive to work
- People’s identity and purpose is often tied up in paid work, so a system that facilitates a reduction in labour force participation could have negative effects on wellbeing
- The money necessary to fund a UBI scheme would be more effectively spent elsewhere.

³ Based on ONS, [Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2019](#), 24 June 2020

⁴ OBR, [March 2020 Economic and fiscal outlook – supplementary economy tables](#), March 2020, Table 4.7

1.3 Recent research on UBI in the UK

In the UK, the most detailed work on UBI in recent years is probably the research undertaken as part of the University of Bath Institute for Institute for Policy Research (IPR) research programme [Examining the case for a basic income](#). This looked in detail at the case for a UBI scheme and what such a scheme might look like in the UK context.

A September 2017 IPR policy brief, [Assessing the Case for a Universal Basic Income in the UK](#), looks at the recent increase in interest in the idea of UBI schemes; takes an objective look at the core issues relating to UBI's desirability, surveying the existing theoretical and empirical literature on UBI's likely effects; assesses its feasibility as a realistic proposal in the UK; and considers various options regarding policy design and implementation strategies. It also gives a review of existing literature and secondary data, and the findings from further microsimulation work undertaken by researchers at the Institute for Policy Research.

[Pages 11-16 of the University of Bath policy brief](#) give an overview of the findings from the (very limited) experiments undertaken up to 2017. None of the experiments undertaken, however, involved testing a full Universal Basic Income model, and such evidence as is available is of limited value in assessing the case for a UBI in the UK (and indeed elsewhere), for the reasons set out in pages 15-16.⁵

The policy brief was the culmination of extensive research, seminars and workshops. Two earlier reports from the research included:

- [The Fiscal and Distributional Implications of Alternative Universal Basic Income Schemes in the UK Money for everyone: The state of the Basic Income/Citizen's Income debate](#), March 2017
- [Exploring the Distributional and Work Incentive Effects of Plausible Illustrative Basic Income Schemes](#), May 2017

1.4 Work and Pensions committee report on Citizen's Income in 2017

On 28 April 2017 the House of Commons Work and Pensions Committee published a short report on [Citizen's Income](#).⁶ In light of recent interest in Citizen's (or Universal Basic) Income as a possible solution to many of the problems and uncertainties of the modern welfare state and labour market, the Committee held a one-off oral evidence session at the University of Birmingham on 12 January 2017, during which it heard both sides of the arguments from an expert panel.

The Committee concluded that Citizen's Income was a "distraction" from finding workable solutions to welfare state problems, and urged the then incoming Government "not to expend any energy on it."

⁵ Luke Martinelli, [Assessing the Case for a Universal Basic Income in the UK](#), September 2017

⁶ HC 793 2016-17

[...] CI may be an attractive idea on several counts. We convened a panel of experts to help us understand the appeal of CI and its practical application. Ultimately, we were at a loss to understand how CI could even partially resolve the issues it purports to address

There are fundamental practical problems with implementing CI. A universal CI would simplify welfare by replacing the existing benefit system. Yet providing an adequate unconditional income for all would require prohibitive increases in taxation and may undermine incentives to work at all. Some proponents of CI therefore suggest a more modest unconditional payment; CI would be paid alongside some existing benefits to avoid creating substantial losses for claimants with, for example, disabilities or high housing costs. Yet the complexity of such a system would undermine a key argument for introducing CI, and leave the promises of income security and poverty reduction largely unrealised. At best, we would end up with something very similar to Universal Credit.

There are significant challenges to overcome within the welfare system: ones that supporters of CI rightly take an interest in addressing. But CI is not a panacea. Indeed, there are many problems to which it is neither the optimal, nor even an appropriate, solution. CI risks being a distraction from workable welfare reform. We urge the incoming government not to expend any energy on it.

[Commenting on the publication of the report](#), the then Chair of the Work and Pensions Committee, Frank Field MP, said:

"A universal Citizen's Income would either require unthinkable tax rises or fail to deliver its objectives of simplification and a guaranteed standard of living. There are problems in the welfare system, but CI is not the solution to them. Rather it is a distraction from finding workable solutions."

1.5 International examples

There is no model of a permanent, state-wide, unconditional UBI (fitting Annie Lowrey's the description above) anywhere in the world today, although experiments and comparable schemes have been trialled. A selection of these are described below.

The Finnish experiment

The most high profile experiment in recent years has been the [Basic Income Experiment](#) conducted in Finland in 2017–2018. During the experiment, a total of 2,000 unemployed persons between 25 and 58 years of age received a monthly payment of €560, unconditionally and without means-testing. The experiment was conducted by Kela – the Finnish Social Security Agency – and the final results from the evaluation were published on 6 May 2020.

The headline findings from the evaluation were that there were small positive employment effects, and better perceived economic security and mental wellbeing, for basic income recipients compared with the "control group" in receipt of ordinary unemployment benefits.

The [Kela website](#) summarises the findings:

The employment effects of the basic income experiment were measured for the period from November 2017 to October 2018. The employment rate for basic income recipients improved slightly more during this period than for the control group. However, the interpretation of the effects of the experiment is made more complicated by the introduction of the activation model at the beginning of 2018, which meant more stringent entitlement criteria for unemployment benefits asymmetrically in both groups.

During the first year of the experiment, when the activation model had not yet been introduced, the basic income did not have any employment effects for the basic income recipients at group level. All in all, the employment effects were small.

The effects of the basic income experiment on wellbeing were studied through a survey. Survey respondents who received a basic income described their wellbeing more positively than respondents in the control group. They were more satisfied with their lives and experienced less mental strain, depression, sadness and loneliness. They also had a more positive perception of their cognitive abilities, i.e. memory, learning and ability to concentrate. In addition, the respondents who received a basic income had a more positive perception of their income and economic wellbeing than the control group.

A total of 81 basic income recipients were also interviewed for the study. The interviews highlight the diverse effects of the experiment and the differences in the starting points and life situations of the basic income recipients.

The Utrecht experiment: *Weten wat werkt* (What Works)

A [recently-concluded 16 month randomised control trial](#) of different social security interventions in the Netherlands looked at employment and wellbeing outcomes. Participants were randomly divided into four different treatment groups. The trial included a group who received unconditional benefits without further mandatory interventions, as well as additional financial work incentives and more intensive interventions from caseworkers in other groups. The study found positive effects for all the interventions it tested against the status quo.

For the group facing no conditionality, the [key findings](#) were:

- In the first months of the study, negative effects on labour market participation for this group occurred but disappeared towards the end of the study. Effects on a complete exit from benefits could be distinguished from zero, but indicated a positive effect in the last month.
- It was striking that lower educated people clearly benefited more from *Autonomously in action* [the name of the no-conditionality group] than intermediate and higher educated people. For lower educated people, the chances of complete exit from benefits, a job of more than 12 hours per week and a permanent contract increased. For intermediate and higher educated people, the approach did not seem to have any effect.
- In the group *Autonomously in action* a shift took place with regard to the type of work contract entered by participants. While participants in other groups mainly entered into temporary

contracts, in this group the percentage of participants with a permanent contract increased.

Further information can be found in the Utrecht University briefing, [Final report What works \(Weten wat werkt\)](#) (1 May 2020).

The Permanent Fund Dividend in Alaska

Since 1982, the US state of Alaska has paid every citizen an unconditional dividend, largely out of revenues from the state's oil industry. In a study [Looking at the PFD's impact on employment](#), University of Chicago academics Damon Jones and Ioana Marinescu found that the scheme had not had a significant impact:

The unconditional cash transfer thus has no significant effect on employment, yet increases part-time work.... In a world where trade, technology, and secular stagnation threaten people's incomes, there is growing interest in a universal basic income to promote income security. Our study of Alaska contributes to our understanding of the likely impacts of a small universal basic income on the labor market. Our results show that adverse labor market effects are limited, and, importantly, a small universal and unconditional cash transfer does not significantly reduce aggregate employment.

The PFD has existed for 40 years, and proved popular enough that in the most recent gubernatorial election in 2018, the winning candidate [ran on a platform of increasing it significantly](#).

1.6 Coronavirus-related debate

The coronavirus pandemic prompted significant Government action to support household finances as the country went into lockdown and sectors of the economy were closed. This, including the "furlough" Coronavirus Job Retention Scheme and Self Employment Income Support Scheme, is explored in our Commons Library briefing CBP-8894, [Coronavirus: Support for household finances](#). Subsequent developments are covered in Commons Library briefing CBP-8973, [Coronavirus: Withdrawing crisis social security measures](#) (updated 25 September 2020).

During the crisis advocates of UBI [have made their case](#), including members from across the House – such as the Conservative [Edward Leigh](#), [Alison Thewliss](#) from the Scottish National Party, [Ed Davey](#) from the Liberal Democrats and Labour's [Beth Winter](#). These arguments have often relied on the difficulties governments face providing a universal and watertight safety net through traditional policy instruments.

The Royal Society for the Encouragement of Arts, Manufactures and Commerce (RSA), long time supporters of UBI, argued for an "emergency basic income." This would provide support for the self-employed people and others who might have been missed out by the then proposed schemes.⁷

⁷ RSA, [UBI and the self-employed](#), 24 March 2020

[Responding to calls for UBI](#), Torsten Bell, the Chief Executive of the Resolution Foundation and early advocate of some of the policies such as the Job Retention Scheme subsequently adopted by the Government, argued that introducing UBI would take time and finite state capacity to implement. He added that calls are “misguided given the pace of what is happening.”

The Conservative Party position on UBI

The flagship social security policy of the contemporary Conservative party has been Universal Credit. The [case for Universal Credit](#)⁸ was made with some of the same goals UBI proponents claim today – increased simplicity through replacing multiple benefits with one and removing financial disincentives to work created by high and uneven withdrawal rates as claimants earn more.

However, Universal Credit also strengthened some principles – means testing and conditionality – that UBI seeks to remove or diminish.

Commitment to these principles, as well as worries about cost, form the basis of contemporary Conservative resistance to the idea. The coronavirus crisis has given the Conservative Government multiple opportunities to reject calls for UBI. It has done so not only on the grounds of practicality, but also on principle.

On 4 May this year, in response to a suggestion from Neil Gray MP in the House of Commons that the Government replace its existing coronavirus support schemes with “a far simpler universal basic payment with a longer view towards basic income”, the Secretary of State for Work and Pensions Thérèse Coffey said:

There is a variety of analysis on universal basic income. The latest report I saw estimated it would cost over £400 billion a year. It is not targeted at the poorest in society and is not an appropriate way for us to try to distribute money. Instead, our schemes are focused on making sure that the poorest do get help.⁹

A parliamentary written answer on 29 June 2020 on the feasibility of implemented a model of UBI in the UK stated that “Universal Basic Income is extremely expensive, reduces work incentives and does not target those most in need of support”.¹⁰

The Labour Party

In recent years most advocates of Universal Basic Income have been on the left of the political spectrum. Contemporary supporters of UBI can be found in many of Labour’s aligned interest groups and in the trade union movement.

Recent Labour Party leaderships have also been more open to the idea than the Conservatives, but have stopped short of promising to introduce a basic income. Former Shadow Chancellor John McDonnell commissioned Guy Standing, an Economics Professor and prominent

⁸ See Centre for Social Justice, [Dynamic Benefits: Towards welfare that works](#), 16 September 2009

⁹ [HC Deb 4 May 2020 c 427](#)

¹⁰ [PQ 64215 \[on Universal Basic Income\] 29 June 2020](#)

basic income supporter, to write a report proposing and pilot of basic income in the UK. The report was published in May 2019, and the subsequent Labour General Election manifesto promised a pilot:

we will explore other innovative ways of responding to low pay, including a pilot of Universal Basic Income.¹¹

Jonathan Reynolds, the Shadow Secretary of State for Work and Pensions since April 2020, wrote in 2016 about how he "[learnt to stop worrying and love basic income](#)." However, since becoming Shadow Secretary of State, the approach to UBI has become more equivocal. The Labour front bench did not join calls for a crisis Basic income in response to the coronavirus pandemic. Quoted in a 30 July 2020 interview with LabourList, Mr Reynolds said, however, that he remained interested in UBI:

I like benefits that aren't means-tested. I think something that is genuinely comprehensive and universal and open to everyone is clearly a plus.

However, he added that it is "not a magic bullet" and the need to provide additional support for people with disabilities and with housing costs meant that basic income would need to be a "component of the system".¹²

The Liberal Democrat Party

There have been advocates for UBI in the Liberal Democrat Party, and before it the Liberal Party, for some time. The party developed its own proposal for a Citizen's Income in 1990, although these were subsequently dropped in 1994.¹³ During the coronavirus pandemic there has been a resurgence in interest, with Liberal Democrat politicians expressing support for the introduction of a form of Universal Basic Income which the party recently endorsed at its conference in September this year.

Whilst a candidate for the leadership of the party (and as acting leader), Sir Ed Davey argued in April during a debate in the Commons that:

Economic policy must tackle Britain's unequal society, so exposed in this crisis, including the poor pay of people in the care sector, the problems with the universal credit system and the low levels of statutory sick pay. All these problems show that we must do far more to increase social justice in our country, and I believe that they show that we should look more seriously at proposals for a universal basic income.¹⁴

On 29 July, he set out proposals for a new 'Sovereign Wealth Fund' to finance a new UBI scheme. Under this plan, firms unable to pay back their government-backed loans, or who believed repayments would hinder their growth, would be able to exchange the debt for shares

¹¹ Labour party, [It's time for real change: the Labour Party manifesto 2019](#), 21 November 2019

¹² [Reynolds promises "no return" to George Osborne rhetoric on social security](#), LabourList, 30 July 2020

¹³ '[Liberal Democrats' Conference: Citizens Income Plan Dropped](#)', The Independent, 22 September 1994

¹⁴ [HC Deb 27 April 2020 c156](#)

which could be used to fund UBI once the business recovered.¹⁵ This, he argued, would “help the most vulnerable, who too often slip through our byzantine welfare state, from the homeless to young people starting out” and that it would “recognise the crucial work of millions of unpaid carers in our society”.¹⁶

At the Liberal Democrat conference on 25 September, the party passed a [motion](#) committing it to “campaign for a Universal Basic Income, paid to all long-term UK residents”, to be “funded in a socially just and equitable manner to create a fair social security system for all”. The party’s Federal Policy Committee will work further on the details of implementation. Announcing the passage of this motion, newly-elected party leader, Sir Ed Davey, argued:

Trials of UBI have suggested it can improve mental health, financial wellbeing, and boost people’s confidence. It can properly value carers and caring for the first time and in practice can be a huge boost to the incomes of many women in particular. It can act as a second safety net for those in difficulty, for the most marginalised who fall through the current complicated system

We never know what’s around the corner. Coronavirus has shown us just how fragile our system is, and how easily it can fail people. From shielding people from another global crisis to rewarding informal caring, we need a system which prioritises social and economic resilience for individuals and for our country.

UBI is a huge step towards the fairer society we, as liberals, should champion. I couldn’t be prouder that so many Liberal Democrats today voted to fix our broken system.¹⁷

The Scottish National Party

The Scottish National Party (SNP) has become more vocal in its support for the implementation of UBI across the UK, and in Scotland in particular, during the course of the coronavirus pandemic. During Prime Minister’s Questions on 18 March, before the Government announced the Coronavirus Job Retention Scheme, Ian Blackford MP, leader of the SNP at Westminster, expressed support for a temporary UBI to support people during the crisis and called on the Government to “provide people with the security of a universal basic income”.¹⁸

Responding to a Reform Scotland [report which recommended proposals for a Basic Income Guarantee](#) to support people through the coronavirus crisis in early April 2020, the First Minister of Scotland, Nicola Sturgeon, [noted](#) that she had “long been interested in [the] concept of UBI” and that the coronavirus crisis “strengthens the case immeasurably”. She noted that the Scottish Parliament does not currently have the powers to introduce such a scheme in Scotland, but

¹⁵ [‘Exclusive: Ed Davey tells Rishi Sunak to fund universal basic income with coronavirus debt-for-shares plan’](#), The House Magazine (PoliticsHome), 29 July 2020

¹⁶ [‘Covid economics have made a Universal Basic Income possible’](#), The House Magazine (PoliticsHome), 29 July 2020

¹⁷ [‘Lib Dems back universal basic income’](#), Liberal Democrats website, 25 September 2020

¹⁸ [HC Deb 18 March 2020 c997](#)

expressed hope that there could be a “serious discussion” with the UK Government on its implementation.¹⁹

At Prime Minister’s Questions on 22 April, Mr Blackford announced that the SNP was “leading a cross-party call for a universal basic income to finally protect everyone” and to “help to ensure a strong economic recovery and a fairer society”.²⁰

In an article for The House Magazine on 28 April, the SNP Spokesperson for Business, Energy and Industrial Strategy Drew Hendry MP argued that “Universal Credit has never been enough to support families”, and that a UBI scheme would support people during the coronavirus crisis, as well as “get us through the recovery phase as we strain our collective muscle to get our economy working again”. He argued that UBI would support the economic changes brought about by increased automation of traditional workplaces and the subsequent effect on the labour market. He further suggested that it would provide “a platform for more productivity – removing low-level risks around entrepreneurship and new small business development”.²¹

The Green Party

The Green Party of England and Wales has for several years been in favour of introducing a UBI scheme. It published a [proposal for a ‘Basic Income’](#) in advance of the 2015 General Election, and in November 2019 announced a proposal for a “fully costed Universal Basic Income for every resident by 2025”. Under these most recent proposals, all benefits aside from Housing Benefit and Carers Allowance would be incorporated into the new payments for every adult of “at least £89” per week (with additional payments for those who face barriers to working), to be phased in over five years.²²

The Party has reiterated its calls to introduce UBI during the coronavirus crisis. Its co-leader, Jonathan Bartley, argued in early May this year that “[i]t’s clear that only universal and unconditional protection ensures that nobody is left behind”, and that:

Universal basic income says proudly that each of us is deserving of a dignified life, whether or not we are deemed economically productive especially when that toil is often in a pointless job which serves to make men like Richard Branson even richer while driving our climate off a cliff.²³

More recently, Caroline Lucas MP noted that some people (particularly the self-employed and freelancers) had struggled during the crisis to access adequate support, and called on the Government to adopt UBI to protect people’s incomes during the coronavirus crisis:

¹⁹ [‘Universal basic income case ‘strengthened’ by coronavirus’](#), STV News, 10 April 2020

²⁰ [HC Deb 22 April 2020 c45](#)

²¹ [‘Universal Credit has never been enough to support families, we need a universal basic income’](#), The House Magazine (PoliticsHome), 28 April 2020

²² [‘Green Party announced plan for fully costed Universal Basic Income for everyone’](#), Green Party website, 15 November 2019

²³ [‘Labour’s failure to embrace UBI shows they haven’t grasped the scale of the crisis’](#), Bright Green, 8 May 2020

There is a simple and effective way to start to put things right and a universal basic income delivered via a welfare system that lifts everybody up would be a key cornerstone of that.²⁴

2. UK Parliament Material

2.1 Debates

HL Deb, [Income equality and sustainability](#), cc486-525, 6 May 2020

HC Deb, [Universal Basic Income](#), c541, 6 May 2020

HC Deb, [Covid-19: DWP update](#), cc421-39, 4 May 2020

HL Deb, [Covid-19: People living in poverty](#), cc329-43, 30 April 2020

HC Deb, [Universal Basic Income](#), cc420-34WH, 14 September 2016

2.2 Committees

Petitions Committee, [Support for individuals and households during COVID-19](#), HC 754, 17 September 2020.

Work and Pensions Committee, [Citizen's Income](#), HC 793, 26 April 2017

2.3 Early Day Motions

ASSESSING THE FEASIBILITY OF CITIZENS' BASIC INCOME PILOTS IN SCOTLAND

EDM 679 (Session 2019-21)

2 July 2020

Ronnie Cowan

That this House notes the recent publication of the report entitled Assessing the Feasibility of Citizens' Basic Income Pilots in Scotland which presents comprehensive and detailed research into the feasibility of a citizens' basic income pilot in Scotland; further notes that it has been developed by a successful collaboration of local government and public health bodies supported by the Scottish Government; and calls on the UK Government to work with the Scottish Government on developing a basic income pilot and to instruct HMRC and the Department for Work and Pensions to co-operate with the Scottish Government as they seek to establish such a pilot scheme.

TEMPORARY UNIVERSAL BASIC INCOME

EDM 302 (Session 2019-2021)

16 March 2020

Kevin Brennan

That this House calls on the Government to introduce a temporary universal basic income or an emergency measure to help freelancers and the self-employed effected by the covid-19 outbreak.

2.4 Parliamentary Questions

Personal Income: Scotland

2 Jul 2020 | PQ 68356

Asked by: Dr Phillipa Whitford

To ask the Secretary of State for Work and Pensions, with reference to the Citizens Basic Income Feasibility Study Steering Group's report entitled Assessing the Feasibility of Citizens' Basic Income Pilots in Scotland, if she will hold discussions with (a) the Scottish Government and (b) HMRC on the potential merits of a universal basic Income pilot in Scotland.

Answering Member: Will Quince | Department for Work and Pensions

I do not intend to meet with the Scottish Government officials to discuss the report on the feasibility of piloting a Citizens Basic Income (CBI) in Scotland as I do not think a CBI is the right approach for the UK. A CBI does not take any account of people's needs and circumstances, is not targeted at the poorest in society and would be hugely expensive.

This government believes Universal Credit is the right strategy for the UK because it simplifies the benefits system, promotes and incentivises work and provides targeted support to those in most need in a way that is affordable.

Oral Questions to the Prime Minister

1 Jul 2020 | 904107 (HC Deb 1 Jul 2020, c323)

Asked by: Christine Jardine

There are 3 million people in this country who get no support at the moment because they are self-employed or on contract. Our black, Asian and ethnic minority communities have an unemployment rate that is twice the national average and women are disproportionately affected by covid-19. The Prime Minister said a few minutes ago that he stands ready to help. Will he look at a universal basic income so that these people can get the help that they need now? [904107]

Answering Member: The Prime Minister

The hon. Lady raises a very important point about the self-employed. As she knows, we have provided very considerable support as part of the overall package of £120 billion—I think we have given £22 billion altogether through the furlough scheme for employed and self-employed people. Her further suggestion for a universal basic income is one that we have looked at. The best way forward for our country is to get the disease under control in the way that we are doing; get our people back into work; build, build, build; and take this country forward.

Personal Income: Scotland

24 June 2020 | PQ 64254

Asked by: Owen Thompson

To ask the Secretary of State for Scotland, what assessment he has made of the feasibility of devolving sufficient powers for the Scottish Government to undertake a national basic income experiment per the

recommendations of Basic Income Scotland's Report on the feasibility of Scottish Citizens' Basic Income pilots published in June 2020.

Answering Member: Alister Jack | Scotland Office

Since 2016, the Scottish Government have had the power to provide assistance for social security purposes in areas of devolved responsibility. Scotland has significant tax and welfare powers and can top-up existing benefits, pay discretionary payments and create entirely new benefits altogether.

The funding of the Scottish Government's social services programmes is entirely a matter for them out of the funds allocated to it for that purpose. Where the Scottish Government introduces a new policy which has expenditure implications it is for them to find the appropriate funding, including through their own tax raising powers where appropriate.

Personal Income

24 June 2020 | PQ 64255

Asked by: Owen Thompson

To ask the Chancellor of the Exchequer, whether he has had discussions with Cabinet colleagues on implementing a basic income to support the UK economy's recovery as the covid-19 lockdown restrictions are eased.

Answering Member: Jesse Norman | HM Treasury

The Government is committed to helping families get through this crisis. The Government has announced a significant package of welfare measures to support those who need it most, including a £20 per week increase to the Universal Credit standard allowance.

The Government's approach to welfare is to recognise the value and importance of work, while protecting the most vulnerable in society. The Government considers that there are fundamental problems with the realities of a Universal Basic Income (UBI) and does not see it as an effective method of advancing social equality.

This is because a flat rate UBI does not take into account the additional needs and costs faced by some individuals. It therefore has the potential to increase inequality markedly. Any practical implementation would also be expensive, and would require a significant increase in taxation.

Personal Income

21 Apr 2020 | PQ 38615

Asked by: Christine Jardine

To ask the Chancellor of the Exchequer, whether he has made an assessment of the potential merits of introducing a universal basic income.

Answering Member: Steven Barclay | HM Treasury

There are fundamental problems with the reality of a Universal Basic Income (UBI). A flat rate UBI would not take into account people's

circumstances, and the additional costs faced by some individuals. Therefore, a UBI would not target support where it is most needed.

To protect people's incomes during the Covid-19 crisis, the Government has announced alternative measures, including the Coronavirus Job Retention Scheme and Self-Employment Income Support Scheme, and additional support for low income families which can be delivered quickly and effectively through the existing welfare system. This includes increasing the Universal Credit (UC) standard allowance, the Working Tax Credit basic element, and the rates used to calculate Housing Benefit and the UC housing element. At a time when the Department for Work and Pensions and HM Revenue and Customs are experiencing unprecedented demand, we have rightly prioritised the safety and stability of the existing tax and benefit systems.

Personal Income: Sheffield

17 June 2019 | PQ 265451

Asked by: Chris Ruane

To ask the Secretary of State for Work and Pensions, if her Department will take steps to monitor the roll out of a universal basic income pilot by Sheffield City Council; and if she will make a statement.

Answering Member: Alok Sharma | Department for Work and Pensions

We are aware of experiments in universal basic income (UBI) around the world and we do not believe there is a case for UBI. We believe Universal Credit is the right approach for the UK because it simplifies the benefit system, promotes and incentivises work, including progression in work, and provides targeted support to those in most need in a way that is affordable.

In February 2018 the OECD concluded in its [survey of the Finnish Economy](#) that the complexity of the current benefits system in Finland was an obstacle to stepping into work and that the basic income experiment, whilst possibly enhancing work incentives, may increase poverty and would require increasing income taxation by nearly 30%. More recently, findings from the evaluation of the Finnish basic income experiment show some improvement in perceived wellbeing, but that it did not increase the employment level of the participants in the first year of the experiment. The OECD also developed a scenario for Finland inspired by the UK's Universal Credit (UC). They found that this 'would consistently improve work incentives and reduce complexity, with limited changes to the income distribution and limited fiscal cost.

This [OECD blog post](#) is particularly useful on the OECD's work to compare UBI and UC.

3. Devolved Parliaments/Assemblies

3.1 Welsh Parliament/Senedd Wales

[Universal Basic Income, Motion NDM7384: Jack Sargeant](#), 30 September 2020

3.2 Scottish Parliament Parliamentary proceedings

Scottish Parliament, [Universal Basic Income](#), 27 March 2019

Scottish Parliament, [Citizens Basic income Pilot Schemes](#), 24 January 2019

Committee proceedings

Social Security Committee, [Oral session: Citizens Basic Income Pilots](#), 28 November 2019

Social Security Committee, [Oral session: Citizen's income](#), 9 March 2017

3.3 Northern Ireland Assembly

Assembly Questions

[Short-term Basic Income](#)

18 March 2020 | AQW 3818/17-22

Asked by: Colin McGrath

To ask the Minister for the Economy what consideration is being given to the provision of a short-term basic income model especially for self employed people to assist them during the COVID-19 outbreak.

Ministerial Answer:

The cost of a short-term basic income model, for the self-employed is beyond the funding envelope available to the Northern Ireland Executive. Consideration of such a proposal would be a matter for the UK Government. However, this is an evolving situation and my Department, along with Executive colleagues, continue to explore all potential options to identify further means of offering support to as many local businesses as possible during the Covid-19 pandemic.

Currently there are UK wide means of support available to the self-employed, including the Self-employed Income Support Scheme. This offers 80% of trading profits up to a maximum of £2,500 per month for 3 months. To date over 69,000 claims have been made to the scheme from individuals in Northern Ireland. Other support is available such as HMRC Time to Pay, Income Tax Deferral, the recently extended mortgage holiday and changes to the rules of Universal Credit. Further details are available at <https://www.nibusinessinfo.co.uk/business-support/coronavirus> .

Specific to Northern Ireland, the Minister of Finance announced a 3 months rates holiday which has been extended by one month for all businesses and for the remainder of this financial year for businesses in the retail, hospitality, tourism and leisure sectors, childcare facilities and Belfast City Airport, Belfast International Airport and the City of Derry Airport.

Additionally, on 5 May 2020 I announced the development of the NI Microbusiness Hardship Fund. Self-employed people who employed at least one other person were eligible to apply for the fund. This scheme closed to new applications 12 June 2020.

Short-term Basic Income

18 March 2020 | AQW 3815/17-22

Asked by: Colin McGrath

To ask the Minister of Finance what consideration is being given to the provision of a short-term basic income model, especially for self-employed people, to assist them during the COVID-19 outbreak.

Ministerial Answer:

I have lobbied the British Government on provision for the self-employed and the Chancellor announced the Coronavirus (COVID-19) Self-employment Income Support Scheme on the 26th of March 2020.

I am disappointed that the first payments from this scheme are not expected until the beginning of June. My officials will be working with their Treasury counterparts to monitor its impact locally and I will continue to press Treasury Ministers on their support for the self-employed.

4. Press Articles

The following is a selection of reports and other articles relevant to Universal Basic Income (UBI). Please note that the Library is not responsible for either the views or accuracy of external content.

[**Lib Dem members expected to commit party to UBI in vote at online conference**](#)

The Independent

24 September 2020

[**Leeds becomes largest city in UK to call for UBI pilot**](#)

The Independent

17 September 2020

[**“Our generation’s NHS”: Support grows for UBI**](#)

The Guardian

10 August 2020

[**Citizen’s basic income: Pilot scheme “challenging but desirable”**](#)

BBC News

11 June 2020

[**Spain to push through minimum income guarantee to fight poverty**](#)

The Financial Times

28 May 2020

[**Furlough scheme strengthens case for UBI, says Institute for Economic Affairs**](#)

The Times

26 May 2020

[**A universal basic income to safeguard our future**](#)

The Royal Society for Arts, Manufactures and Commerce

Ronnie Cowan MP

13 May 2020

[**Finnish trial of UBI should encourage similar system in the UK**](#)

The Scotsman

6 May 2020

[**Coronavirus in Scotland: Nicola Sturgeon eyes plans for UBI**](#)

The Times

5 May 2020

More than 100 UK opposition politicians call for UBI after lockdown

Financial Times

22 April 2020

Coronavirus: Over 170 MPs and Lords call for UBI during pandemic

The Independent

20 March 2020

DUP joins Commons call for basic universal income as Covid-19 crisis deepens

The Irish News

19 March 2020

Government considers UBI to help workers through coronavirus crisis

The Telegraph

18 March 2020

5. Further reading

5.1 Recent reports and briefings

Cemal Karakas, [Basic income: Arguments, evidence, prospects](#), European Parliament briefing, September 2016

OECD, [Basic income as a policy option: can it add up?](#), policy briefing, May 2017

Andrew Harrop and Cameron Tait, [Universal basic income and the future of work](#), Fabian Society report commissioned by the TUC, July 2017

Luke Martinelli, [Assessing the Case for a Universal Basic Income in the UK: An IPR Policy Brief providing a detailed insight into the implications of implementing a universal basic income](#), University of Bath, September 2017

Chris Goulden, [Universal Basic Income - not the answer to poverty](#), Joseph Rowntree Foundation blog, 25 April 2018

Stewart Lansley and Howard Reed, [Basic Income for All: From Desirability to Feasibility](#), Compass, January 2019

World Bank, [Exploring Universal Basic Income : A Guide to Navigating Concepts, Evidence, and Practices](#), February 2020

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Dear Chancellor,

We are writing to request that you support trials of Universal Basic Income across The UK and that Guildford be considered as a site for one such trial- not least as a response to the ongoing economic shocks caused by coronavirus.

Hundreds of people in Guildford and millions across the UK have missed out on the government's support packages leaving countless families facing poverty and extreme hardship. We note findings that show Universal Credit is insufficient and has been linked to high mortality rates and believe that it is ill-equipped to support people through the kind of financial insecurity that many now find themselves in.

Guildford Borough Council passed a motion in support of UBI because we believe that innovative approaches have to be employed to create an income floor for everyone, allowing our families and communities to thrive. The pandemic showed that we urgently need to strengthen our social security system. The creation of a Universal Basic Income (UBI) – a regular and unconditional cash payment to every individual in the UK – could be the solution.

This Government promised to level up. What better way to level up than to guarantee every adult UK citizen a basic income. The security and wellbeing this would facilitate would truly allow us to build back better, whilst saving tax payers money that would otherwise go on social and medical care. Studies suggest, in fact, that such savings could cover the cost of UBI.

Local authorities across the UK (Liverpool, Sheffield, Hull, Norwich, Leeds, Belfast, Newry, Mourne and Down, Derry and Strabane, Edinburgh, Fife, Glasgow and North Ayrshire), the Scottish Government and the Welsh Senedd have all expressed their intention to trial a UBI. But they need cooperation and support from the DWP and HMRC to move forwards. We, as a cross party council, are calling on you and the government to take action to support these trials.

Your sincerely,

Leader

Deputy Leader

Leader of each party group

Councillors (optional)

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Appendix 1

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