



Events on the highway

CONSULTATION RESPONSES

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Events on the Highway – Consultation Responses

Executive Summary

Following the consultation period 14 responses were received ranging from individuals to district councils. The overall feedback was positive to the steps that the County Council are taking to mitigate the withdrawal of the police presence for traffic management. However there were a number of issues that were raised by the respondents.

- The most common question was around marshals and stewards. The policy will look to provide a clearer distinction between the two. The training course proposed is still being explored so it is difficult to provide firm details which a number of responses sought.
- A belief that marshals would, by default, be required at events. This is not the case as it is only closures that require 'active' traffic management that would require marshals. Barrier and sign closures can be unmanned or manned with a steward.
- Concern that the County Council are trying to change or complicate event management or demand traffic management companies are used. This is not the case, it is inevitable that the withdrawal of the police from traffic management will create a need for change however the policy seeks to retain, where possible, the easiest way to allow events to carry on. If it can be demonstrated that a traffic management plan can be facilitated without a third party company then this would not be an issue.

Overall it is intended that the only current changes to the policy document will be clarifications and further explanations. The responses have not challenged the aim of the policy but have exposed possible misunderstandings that can be resolved.

Overview

The Draft new policies and procedures document was circulated to all County Councillors and District Chief Executives, with a request to circulate the report to local councillors for review and comment on the 13th June 2014. The consultation ran until the end of July to allow the responses to be collated in this report for circulation at the Three Tier forums.

Responses were received by a number of parties and during the consultation period the County Council has provided responses to these comments to try and provide further clarity. The County Council's responses are also included in this report.

Background

Lancashire Constabulary is no longer providing traffic management at parades and events in Lancashire (except those of national significance such as Remembrance Sunday). As a result the County Council alongside the district councils and the police have been working towards mitigating the impact of this for event organisers by setting out a clear process and the requirements expected for events to occur

safely and legally on the highway. The document circulated for consultation seeks to set out how the County Council are trying to minimise the impact on events.

Consultation Responses

The following parties have responded to the consultation:

- 3 County Councillors
- 1 District Councillor (acting as event organiser)
- 2 event organisers/organisations
- 7 City, District and Town Councils
- Chorley 3 Tier Forum

County Councillor responses

Consultation response 1

County Council response included in Italics.

- "I assume that not all helpers will need to be accredited marshals, and that provided there is a small core, the bulk of helpers can be made up from stewards (using the definitions in the interim guidance). Accredited marshals can close the road for stewards who will then stand behind barriers."

If the road is to be closed using barriers (i.e. a full closure) then no marshals will be required. The legal closure is empowered by the barrier and signs not the person in this instance. Marshals would only be required if for example there was a rolling closure, where the parade was moving along with traffic. Marshals would in this instance direct traffic to stop whilst the parade passed (i.e. no barriers being used)

- "What form will the accreditation training take, is there any cost, when will courses be available?"

The training program is being worked on at the moment and the council do not have dates as such but we are working to get it in place as quickly as possible. It is reasonable to expect that there will be a cost but these details are still to be finalised.

- "It should tighten up the process, and give those accredited people a bit more authority. Having accredited people will help the application for road closure, and the Risk Assessment for the Event."

Consultation response 2

"Please can you advise if any form of event organisers were involved in putting together these proposals?"

The document was drafted by officers. The police, district and county officers have had input and have fed back comments from their dealings with event organisers as part of this process, an earlier form also went before Scrutiny committee as part of a

wider discussion. The answer to the question is that it hasn't had the direct involvement of event organisers.

Consultation response 3

"A question posed to me has been why do the events have to be advertised especially if they are one offs. Why could the cost not be bought down on that for advertising?"

The event itself does not need to be advertised, although most events will normally want some sort of exposure to ensure that they are successful but that is general marketing and down to the event to sort out if they want. There is no requirement for an event to promote itself.

The only point in which advertising is discussed in the document is around road closures. If the district council (the preferred option) processes the road closure then they are required to place legal notices on site (normally an A4 sheet i.e. low cost). If however the County Council has to process the closure then they are required to place a legal advert in the press notifying the public of the highway closure. The cost of the advert would be borne by the event however the steps we have taken (by using the district powers) should result in this being an exception rather than a rule.

In conclusion:

- If an event requires a closure and it is done by the district council it will be down to the district council's discretion as to whether they charge for the closure.*
- If an event requires a closure and it is done by the County Council then the cost of the press notice will be charged to the event.*
- If an event requires a closure and they agree how it will be signed the County Council has a stock of signs that organisers can borrow (refundable deposit) or choose to buy for their continued use in future events.*

The County Council has taken all the possible steps it can to ensure that the cost burden to event organisers is kept to a minimum whilst still meeting any legal requirements that have to be met.

District Councillor Response

Consultation response 4

"I have been sent the information about events as a local councillor. However I am replying as an organiser of large events in the Fylde. I put on three triathlons each year, and have done for 8 years in St Annes, Ribby Hall and Fleetwood. Two of these require road closures.

These events meet so many local and central Government targets it would be a shame to impact them. We introduce children to sport from age 7 years and up, we bring women back to sport who have left it or not tried it before. We create a community spirit and involve charities in all events.

Like many events the only thing that almost stops us each time is finding marshals, or stewards now as they might be. Finding large numbers of free volunteers is a

challenge. If we were to pay them the event would become so expensive it would exclude all entries except from the rich.

I doubt any Government local or central would want to plan for the rich only. We are inclusive and the cheapest events in the UK to attract people from all schools across Fleetwood and the Fylde, we feel this is important as many such children are excluded by cost.

If the new rules make obtaining marshals more difficult, reduces who can be a marshal, or increases costs it will stop events. I appreciate less events may be a council aim as it reduces the amount of work required and makes life easier but is this the best for community, obesity and health?

I would like to be involved in discussions as I fear bureaucracy and over planning and fear of keeping things simple may create a society that can't function properly. I also fear that many people in the planning may never have put on large scale events and only understand the paper side of it not the reality of it."

A distinction needs to be placed between Marshals and Stewards. A Marshal will have the power to stop and direct traffic, in the same way a police officer does (with a valid road closure order in place to support them legally). Stewards have no such powers and are just there to provide information and support to road users who are affected by road closures.

It could be assumed that the types of events mentioned would utilise full road closures to ensure the safety of the participants. This would be facilitated by "Road Closed" signs and barriers. These closure points would benefit from stewards who can offer advice to road users but do not require fully accredited marshals.

It is important that whilst the County Council will work hard to keep events running, we manage our responsibilities to highway users, spectators and participants. The County Council has to ensure that the road is legally closed and that the appropriate level of signing and staffing is in place to keep everyone safe and informed.

At no stage are the County Council saying that you are now required to pay volunteer stewards, however if during the planning process of the traffic management plan for an event it is decided that marshals are required then it is inevitable that there will be some sort of cost involved. However the County Council is again looking to support in minimising this cost as much as possible. The training program that is being created will allow certain individuals to become marshals, these could be county or district council employees, and they may even be volunteers from local organisations, once trained they would be available every year for the event.

It is disappointing if it is felt that the underlying agenda is to drive down the number of events and to make life easier, this is not the intention. Putting steps in place to try and support events going forward following the withdrawal of the police from traffic management would show that the County Council is doing its best to mitigate any issues that are faced. It is unfortunate if this does not come across clearly in the report.

The intention of this exercise is to empower organisers to take their events forward in a safe and legal fashion, the County Council agree that the organiser will be the best placed person to know what the individual issues of the event are, especially if they have been involved for many years, however the fundamental requirements for a legal road closure cannot be overlooked and a robust traffic management plan with the involvement of the county, police and district working together with the organiser is the best way to facilitate this.

Follow-up response from the consultee

"In 8 years and 18 events we have not seen the police or involved them, yes we have full road closures and it seems you are saying for us nothing at all will change and that is a relief. As I said the trouble with people making decisions who are not event organisers is they have no idea of logistics. For example I need a minimum of 85 marshals or stewards now, and that is cutting it thin. To get volunteers to do this is hard. To get 85 trained council officials to give up almost every weekend of the year is nonsensical and would just mean no events. Many events happen on the same day and many require this level of support to work. You say this is to improve safety which would imply that you have records of incidents and safety issues. In my races there are none, and in all the races I take part in I know of none, and of course the parades I attend I have not heard of any either. We do live in more of a "nanny state" where fear of something is often more important than the reality of nothing happening and I appreciate the police have to make cuts and can't serve the public as they once did but we so often see a sledge hammer being used to crack a nut. If I can help bring some common sense to any of this please liaise with me as I would hate to see Government officials closing events for paperwork reasons and supporting obesity and lethargy as it is easier. I am sure, as you say, this is not the case but fingers crossed on that. Let me know if I can lend any help, all the best with this and let's hope there are no real casualties, and by that I mean events!"

Event organiser responses

Consultation response 5

"Both very useful documents that should once fully implemented, result in the continuation of traditional community events using the highway in a safe and orderly manner. The "respondent", once trained in accordance with the Community Safety Accreditation Scheme (CSAS) intend not only to marshal their own annual Easter event once training has been given, will avail themselves to marshal other groups events depending upon the availability of trained members.

Set out below are points/issues that we would like further discussion on before we fully endorse the policy and interim guidance.

- Training – It is of vital importance that training courses are delivered at a time, date and location that would allow our members to attend, i.e. nights or weekends and local based."

As the training course is current in its concept stage the details of how and when it would be delivered and who is eligible for such training is not yet known but we will take these comments on board.

- "How many of our people can we have trained?"
Who can be trained is at the discretion of the Local Chief Officer for the Police in Lancashire, any person that is permitted could be trained. The County Council would suggest that there would be no arbitrary limit. A copy of the Home Office guidance on the CSAS powers is included for reference.
- "How many Marshals do we need to run our event?"
The nature of the event and its impact on traffic and pedestrians will determine the number of Marshals required. At the point of application the County Council and Police would provide comment on the plan including numbers, route, signs, closure requirements etc
- "How many Stewards do we need?"
The nature of the event and its impact on traffic and pedestrians will determine the number of Stewards required. At the point of application the County Council and Police would provide comment on the plan including numbers, route, signs, closure requirements etc
- "What will be the cost?"
The cost of the training is not known at this time as it is still in its concept stage.
- "How long will it be before refresher training is required?"
The CSAS guide does mention periodic re-assessment however it will be at the discretion of the Lancashire Constabulary to agree the frequency of this.
- "How much will the Marshal training cost."
The cost of the training is not known at this time as it is still in its concept stage.
- "Road signs – The way our event moves along the highway requiring a series of short road closures, makes the use of standard road signs as proposed difficult to manage as they will require to be continually re-sited along the route. It should be noted that before this year's event started, numerous signs were deposited along the route requiring them to be moved only a short distance from the side of the road out and onto the crown of the road. We understand that each road sign should be weighted down with a sand bag to prevent it being blown over by a strong wind. (Not mentioned in the policy document)"
It is difficult to cover every detailed point in the document, the signs for example that we have produced and made available to event organisers at the moment are designed to be zip tied to street furniture therefore not requiring sand bags. We would specify in the approval of the traffic management plan any requirements for signs to be secured and periodically checked for example. The approved traffic management plan will describe how any event will be managed, either by accredited marshals or by physical signing dependent upon circumstance.
- "If we have sufficient trained Marshals available, could they use either hand signals as described in the Highway Code or hand held devices such as LED powered red/green batons or even stop go boards etc."
The Marshals would have the power of a police constable in terms of directing traffic. Batons and Stop/Go boards would not be approved as the power is held by the person not the sign, so hand signals would be the method of

communication with drivers, this would be covered in the training course in more detail.

- "Communication – Marshals will require some effective means of communication i.e. personal radios."

This would be a decision to be made by the event organiser as part of the traffic management plan, if an event organiser decided to utilise this means of communication it would be their own responsibility to resource this equipment.

- "High Vis jackets – Do we need different jackets for both Stewards and Marshals."

The County Council's view at this time is that it would not be necessary to have different jackets. Assuming that the traffic management plan required the use of marshals and stewards then the marshals would be identifiable by an accreditation ID that they are required to wear when carrying out their duties. Also by virtue of the role they are carrying out it should be clear which is which, for example a steward would either be alongside a sign and barrier or on the roadside providing support whereas the marshal would be stood in 'live' traffic facilitating the rolling closure.

- "Interim arrangements – How much of this policy will be in place before Easter 2015 and what are the alternative requirements. If it is a case of instructing a Traffic Management Company/ where are the funds coming from."

The request is to have comments back by the end of next month and it will be discussed at the Three Tier Forums in September. As we are time critical with coming up with a solution to allow events and parades to continue, I would expect as much of the policy as possible to be in place before Easter 2015. The responsibility for the cost associated with events which take place on the highway lie with the event promoter. This will not change.

- "Contacting residents/businesses along the route. Will a short mention in the Free Press suffice?"

As part of the road closure, notices would go up on site informing the public of the forthcoming closure. Any further requirements for additional information and notice will be discussed as part of the conversation at the local Event Safety Advisory Group meetings and agreed Traffic Management plans.

- "Litter – Never been a problem."

Consultation response 6

"That the proposed training will impact on people who volunteer, some are working and some provide child care. Why is it that these marshals who have over 30 years experience in many cases now have to be accredited. Is prior learning and experience not taken into account?"

The training that is proposed to be made available by the County Council is to provide marshals with the power of a police constable (i.e. the power to legally direct traffic, and for it to be an offence for those directions to be ignored). For an event to

occur on the highway it is necessary to have some sort of legal closure in place, either rolling or static. If a static closure is being created then the closure is empowered by the relevant traffic signs (i.e. Road Closed). It is possible for a well coordinated event to be facilitated by a moving cordon of static closures surrounding the event, as the event passes the road reopens whilst ahead of the event the roads are being closed, however this does require a level of coordination that many smaller events may struggle to provide (an example of this is provided in the interim guidance that was circulated alongside the consultation document). The accreditation scheme to provide traffic marshals is being explored to allow the marshals to act like the police at a parade (for example) where they actively manage the traffic around the event. Without knowing the exact details of how your events are currently managed the County Council can only provide the following responses to the question posed:

- 1, If the marshals are providing the management of the event using the movement of barrier and signs (static closure) then it is possible nothing will change;
- 2, If the marshals are facilitating rolling closures then the accreditation would formalise the experience and provide the legal backing to what they are doing.

Consultee response to comments

"A) Athletic Road events do not need a rolling or static road closure in 99% of the cases and this was done as a blanket proposal in the consultation. I am opposed to this element in the consultation.

B) The experience of Race Organisers as my colleague has mentioned is generally greater than the Police or yourselves in this matter and I would hope that recognition is given to this and then used to formulate the final policy

C) The implication from one of your comments above "It is possible for a well-coordinated event to be facilitated by a moving cordon of static closures surrounding the event" could imply without this happening the event is NOT well organised and coordinated. I for example work with the local traffic management officer to check my events are safe and well organised and then have them approved- I appreciate you are after a process that will facilitate this BUT if you are not involved in athletics and its organisation you tend to take a generic view!"

"For athletic road races no need to close roads in most cases an event tends to happen for a few minutes in that area. The implication of the proposals is that full road closure is required at a cost to in our case to a small charity. Unless you have a very large event there is no cost benefit to the organisers. Indeed if only a "Fun Run" or "Flashmob Race" there is no insurance or requirement to inform anyone, this seems wrong. This is likely to benefit very large events e.g. London Marathon, Manchester 10K who have event companies providing marshals and who have mega budgets for promotion from Sponsors-this has no real benefit to Lancashire sports people!"

Firstly it is important to cover the "fun run" and "flashmob race" issue you raise, if the runs are occurring on the highway without the necessary legal closures and permissions from the District/County Council and Lancashire Constabulary then they should not be happening. Just because the events happen doesn't make it right or legal. The County Council agrees that any event that occurs should follow the same protocols and processes to ensure both public and participant safety.

In terms of "cost" the report has not placed any values against the various issues raised. However the County Council has tried at all times to ensure that costs will be kept as low as possible, for example there has been close working with our district colleagues on the best method of processing a legal closure, the power the County Council can use requires an advert in the press whereas the district council power only requires a site notice. Accreditation training is currently available through a private company but the County Council are exploring if it can be provided at a more competitive rate. A batch of temporary signs have been manufactured and distributed around the county for events to be able to use (at no cost) with the possibility of regular events being able to buy a set for their own use every year.

Consultee response to comments

"As mentioned unless you can call a Fun run or Flashmob run organised these events will continue to happen without your permission. We as race organisers know of people who do this to get around the system"

"When I started organising events 31 years plus ago on the day of my races no others occurred nowadays you can have 8 races taking place on the same day in Lancashire-you will need a substantial amount of signage to cover some weekends"

As mentioned earlier, most people who support these events are volunteers and as such could easily walk away from helping (there is significant evidence for this happening already).

The cost is more than likely to close small events - is this what LCC and the Police really intend?"

Entirely the opposite is the intention for this policy. It is important to note that this policy has been drafted as a result of the police announcing that they would not be providing traffic management to the many events in the county. It became necessary for the County Council to work with the constabulary and the district councils to come up with a policy to ensure that as many events and parades could continue as possible. The removal of the police provision and the subsequent conversations with our district colleagues did help identify the large variety of different processes and local practices that needed to be formalised so that an organiser in Lancaster can expect the same steps to be followed as in Chorley. In terms of the polices the County Council is not able to provide a comment on their intentions, however the actions are due to them adopting ACPO (Association of Chief Police Officers) guidance.

Consultee response to comments

"ACPO issued similar guidance in 2000 because of Millennium year-I suspect this is more about a reduction in funding (something which I know you cannot comments on), however if there is no need for Police involvement and there is no need for road closures and provided the event is insured what is the proposed position in clear and unequivocal terms of LCC?"

"Two of us have already highlighted that this is contrary to your view likely to close up to 85% of road race events- we want to make this absolutely clear on that point."

"There has been no involvement of race organisers as far as I can ascertain in formulating this policy, this is ridiculous given that the Police have used our knowledge to improve what they do.

The Police do not marshal any event I have organised, we have had 'Specials' there because they want to be -they have given their time unpaid and have come as support- What then is their role in all this."

No event organiser has been involved in the drafting of this document so far. The policy was an officer authored paper with input and discussion from the Lancashire Constabulary and the district council officers. It is the intention of this consultation at this stage to get the comments and inputs via the County and District Councillors. It can be a chicken and egg issue, if the County Council had not drafted a proposed outline and just sought views we could have been in a situation of having multiple conflicting proposals to try and bring to together. By providing a framework outline and then seeking views we can look to tweak and edit to keep a universal process that meets the maximum number of event's needs.

It is probably important to note that the intention of the document is to provide an outline for event organisers when organising their event. If when you inform the district council of your event and the discussion of a suitable traffic management plan is undertaken, it is at that stage that the detail of how to manage the event would be resolved. If the police and County Council traffic team are happy with the plan then it would be accepted. If as you note the police have not attended before or have applied a light volunteer touch then it is possible that this could be accepted in the future, it is therefore not possible for the County Council to comment on an individual event and as such we can only deal in generalisations at this stage.

"Police have never marshalled at most events. Are we presuming that the Ironman Triathlon or Tour de France principles be applied here and that Police are to be paid for turning out at checkpoints? Only large events need this from the Police!"

Large major events will require an acceptable traffic management plan, if the police chose to attend it would be down to them to offer comment on costs they may charge.

Consultee response to comments

"Ergo smaller events need a much reduced traffic management plan!"

"The proposed policies do not take into account course design. I have to have my route verified, insurance granted etc by either UKA (United Kingdom Athletics), ARC (Association of Running Clubs) or FRA (Fell Runners Association) and I conform to all safety requirements- events are insured for a minimum of £10 million. These governing bodies consist of people trained in risk assessment and litigation, they are in many cases runners - so are both practitioners and monitors of what is happening and would not put themselves or others at risk. Most race organisers would be willing to cascade any useful training down to their volunteers."

The policy is providing a framework for all events on the highway, the County Council haven't commented on any particular type of event because the framework outline can be applied to a street party or church parade in the same way as a major race.

Consultee response to comments

"I think there is a need to identify that affiliated road race events have their own specific requirements and it would be useful to sit down with us and listen to our views/advice in this area"

"I personally ensure my organised races are as safe as can be because if I don't I won't get a) the participants, b) raise much needed money for the Village Hall or local charities and c) the support of the NGB's - Why, why, why weren't people with experience invited to join the consultation group- we use to be on local safety groups."

The County Council do not dispute that your events are as you state well organised and safe, it is not the intention of this process to change any of that. As noted the pressures placed on the County Council, by the immediate removal of the police attendance of events, forced it to put forward a policy framework and then seek comments at this stage.

Consultee response to comments

"Are you saying that all road running events will require a road closure? If you are, you can wave goodbye to around 75 to 80% of road running events. So much for London 2012 legacy.

You should also note that my previous attempts to obtain a road closure order for my event have met with refusal by Lancashire Police. Such was their strength of objection that it is recorded in our risk assessment and planning document to cover ourselves."

Council actions

The comments were passed to the Lancashire Constabulary to provide a comment on as the response identified their refusal to attend events. The Lancashire Constabulary feedback was as follows:

"I have spoken to "the consultee" and as I thought he and his colleagues were worried that it meant the events couldn't happen, I have explained what the 'Events on the Highway' document is all about and why it needs to be brought in and I think he understands it now."

An overview email was also provided to a County Councillor who had been part of the original email chain to provide an update. The main points covered are outlined below:

The important point that the County Council is trying to get across is the County and Districts want to work with event organisers to ensure that anything that occurs on the highway is done safely and is coordinated with other users of the highway. It is entirely likely that the number of runs that are organised may not need a road closure due to the nature of the event however it is still important that the County Council is aware of the event happening so that we can agree any traffic management is acceptable, notify the organiser of any issues (forthcoming road works for example) that may affect the event and manage any other events that may conflict (location/time etc).

District, City and Town Council responses

Consultation response 7

"Welcome and worthwhile documents that could be developed as a basis for the improved management of events on the highway, particularly in light of the intended withdrawal of a traffic management roll that has historically been provided by the police.

It is accepted that the districts can be the primary point of contact for applicants, this roll being an administration function allied to the district's role in the heading of local Event Safety Advisory Groups (ESAGs).

It is accepted that the Town Police Clauses Act 1847 is the preferred legislation.

It is accepted that the county council be responsible for approving traffic management plans for road closures – Note that once the notification of an event is received and circulated to ESAG partners it is considered that LCC as the Highway Authority (in conjunction with the Police Traffic Road Safety Unit) be the focus of communications with event organisers for matters relating to traffic management and road closures i.e. LCC / Police liaise with event organisers in the production of the necessary traffic management plan and traffic management arrangements, and not districts.

The Accredited Training Programme is without doubt a cornerstone of the policy. Adequate and suitable training courses should be available to community groups who may, if they so wish, have the opportunity to have their representatives trained to an approved standard well before the start of the 2015 events programme so that the availability of accredited marshals can be included in the preparation of the traffic management plans as prepared by the event organisers. This will greatly assist LCC traffic engineers in their discussions with event organisers"

There were also a couple of suggested replacement sentences seeking to provide clarity on meanings which will be incorporated into the document.

Consultation response 8

"I would make the following comments that have arisen from discussions with the County Council's Events Manager:

The sign loaning scheme needs to be developed to ensure there is a clear and easy booking process, if however we are asking organisations to have qualified traffic management companies I don't see the need for this."

The County Council agrees, the important part was to secure a small stock of signs initially to help facilitate the events, going forward it would be favourable to see a good stock level of signs at various locations around the county, and as part of this it is suggested that the districts will want to help facilitate sign borrowing system. For annual events the option would be to offer the signs for purchase so that they have them every year going forward. This could be part of any Traffic Management conversation?

"When we explored the Community Safety Accreditation Scheme with the police during Guild, the police had concerns over the legality of the scheme and its implementation; there is also the matter of liability for community volunteers trained in the scheme who is covering them under liability insurance. Also what are the fail-safes in place to ensure a closure is implemented properly and in line with chapter 8?"

The County Council is awaiting the full information back from the police regarding the CSAS scheme, but take on board your concerns, ultimately the police have the discretion as to who can be trained and it must be possible for us to provide Marshals for events as the AA provided marshals for the open last year. Liability insurance – the County Council will ensure that this is discussed with the police as part of setting up the training; it may be that the individual may have to get their own or the organiser would have to ensure that the marshals are covered as part of their event insurance, but this will have to be checked. In terms of the chapter 8, it would be the responsibility of the County Council to ensure that the Traffic management proposed is compliant, in terms of checking the implementation on the day we will have to consider possibly random checks on events, based on the number of potential events and the spread it is likely that we would not be able to attend every one though.

I have grave concerns over a volunteer staffing a closure point, even if they have received training it is a high risk role and potentially puts members of the public at risk of public confrontation or at worst conflict with moving vehicles. We would not put an unlicensed member of staff on the entrance to an event.

We will feed back your concerns but if the closure is fully signed and barriers are in place and any diversions are clearly signed then these conflicts will be minimised, however it will need to be a consideration of the traffic management plan. It has to be remembered that the guidance is covering all sizes of event and parade ranging from a church parade down a street to a closure of a city centre for a major event. The intention is to provide a framework for the District, County and Police to work with, if it is felt that the event will create these conflicts then this can be raised as part of the application process etc. It will be down to the area highway teams and Districts to agree the local adoption of the framework.

"Under the heading 'Longer Parades' the police intervening if a situation arose, I think needs clarifying is this in relation to crime and disorder or under special police powers to divert a procession in the instance of a situation out of the control of the organiser?"

Noted

It is not clear what the relationship of the two documents are, however the interim guidance has no information about insurance, risk assessments, traffic management plans, advance warning, resident/business notification, welfare consideration for participants, parking considerations for participants, stewarding, first aid, litter and waste and so on.

The main policy document is the one that the County Council is looking to adopt when agreed, this is as mentioned above, designed to provide a framework that can be applied across the entire county for all parades and events etc. How our district colleagues and the County Council implement the detail will be down to the local groups to agree. Whilst reference to all the items above as "need to be considered" can be added to the document, it would be expected that this to be part of any

application process and it is important that whilst trying to provide consistency there is flexibility for locally specific issues to be dealt with. Until the main document is adopted it became necessary to state the current position (in the absence of police at parades/events) therefore the interim guidance was pulled together stating an early adoption of the main principles of the "under consultation document" but tried to provide clarity on the impact of not having accredited marshals available (i.e. try and use full closures etc).

"I note in the Draft policy document references ESAG as best practice to ensure communication between District, County and the police, however Preston who has an established ESAG from pre Guild has no physical representation from the County Council despite being on the circulation list."

It would be expected that LCC officers will attend ESAGs in the future

"The draft policy does not include detail about the above considerations outlined in point 4"

Noted

"Will these documents remain as guidance allowing districts to roll out their own localised policies which obviously still reference the guidance however allow for nuances?"

It is intended for the main document to be adopted as a policy by the County Council, it is for this reason that the districts and police have been involved in the drafting process. As noted above, and in response to a number of other comments about the policy, we have attempted to create a framework rather than a set of draconian rules to allow districts and the county to have nuances. The main principles would remain standard, for example, the district is the main point of contact, the county and police will approve the traffic management, etc

"In the Interim Guidance, reference to district council needs adding in the second paragraph on page 1."

Noted

"In the Interim Guidance, 3rd para page 1, reference is made to full closures being the preferred option and yet the majority of the document appears to relate to rolling closures."

This is because the interim guidance is aimed at dealing with those events that would be best placed to use marshals (e.g. at the front and back of a parade) but as this is not possible currently it was about how to manage this.

"In the Draft Policy Document, page 7, 3rd bullet point from the bottom, whilst emergency service access should be maintained at all times, it is seldom the case that residents and business access can be maintained during periods of road closure, although all attempts are made to minimise this impact."

Noted

"There have been a number of issues surrounding complaints from public transport operators and whilst not wishing to single out one particular type of road user, it would be useful to add a comment that early contact needs to be made with bus service operators affected."

Noted – if the closure was to be processed by the county under the RTRA the 12 week lead time is to allow the notification of bus operators etc similar to the TTRO process.

Consultation response 9

A letter was received from a District Council outlining the support for the process and the policy. The following comments were noted:

"The council would make the point that having a clear and consistent set of criteria to be met means that some applications for events will have to be denied because organiser either cannot or will not meet the criteria. This will inevitably lead to some negative publicity either at a local, county or even national level. The fact that there is a clear policy in place designed to protect the interests of all should provide a robust defence to this. The council would however wish to ensure that a communication plan is agreed between the County and Districts to ensure that all would be events organisers are mindful of the proposals."

Consultation response 10

An email was received from a District Council agreeing "that the introduction of a policy for the implementation of highway closures arising from events on the highway is beneficial. The policy should reflect the primary role which Lancashire County Council as highway authority have in approving the closure of highways and the agreement of satisfactory schemes of traffic management" the email then provides a number of suggested edits to the main document to strengthen this view without changing the underlying documents aims and objectives.

It is also noted that in the view of the respondent an events safety advisory group (ESAG) is not empowered to approve or prohibit an event or closure. This view will need to be considered as it will depend on how local processes are set up to handle the event application process. It is reasonable that an event that has an effective traffic management plan and is generally ok to occur on the highway could be effected by the consideration at an ESAG meeting. This will depend on how the local ESAG is set up and what its agreed role is within the process."

Consultation response 11

The response from a district council focussed on the impact on the event organisers that these changes will have. They identified the drop in events that have occurred since the police have withdrawn from events and raise concerns over the financial impact that traffic management could have on small events. The district welcomes the recent communication from the Lancashire Constabulary that a small amount of funds was being made available to help with the transition but it still raises concerns about the long term effects of these changes.

The district notes that the county are looking to set up a training scheme for Marshals however then assumes that the county would then automatically deploy its own in house marshals to events and comments that no costs have been made available. The response does seek prices and financial impact to be made clearer.

There is a feeling that for a number of smaller events the ESAG process is an unnecessary blockage. It is also felt that the flow chart provided in the document requires timescales built in so that it is reasonable to know how long the county will take considering a traffic management plan, for example.

The consultation response raises a number of issues. Until the County Council is able to get the accredited training program set up it is not possible to calculate prices for the training. It is expected that the County Council would train some of its staff to become traffic marshals but these would not be automatically used at every event being run. The training will be available to district council staff as well who may seek to support there local events.

It is important to note that marshals are only required where a rolling closure is required, it may be more cost effective to seek a full closure of a section of highway for a short parade that can be facilitated by signs and barriers. As noted in the guidance the county have manufactured a number of signs available for use by events. It is important to note that were possible costs and impacts have been kept as low as possible whilst the County work to resolve the situation that has arisen by the police withdrawal

The district council wishes to see timescales on the flow chart, as a framework that the county council has put forward for the process that involves working with multiple districts, it is not possible to place timescales on the flow chart as they will not be the same for each area. The framework is intended to allow the individual partnerships to optimise the process to meet there local needs. One district may want 2 more weeks to consider an application than another. This could be a volumes, location, complexity issue and it will be down to the individual districts and the county council highways teams (in that area) to come to a local agreement on timescales and deadlines.

The ESAG potential blockage is another issue that can be agreed locally. The partner organisations may decide that only events over a certain size or location will be passed to ESAG. It is not for this policy document to set those local requirements.

Consultation response 12

Following a conversation with the local district council the following comments were received. "...the wording around points of contact still need to be tightened up as it appears a little confusing as to who organisers should contact and when."

The council also stated that they "would also not be in a position to provide assistance with signage and the taking of deposits as we simply do not have capacity to house the signs etc." It was noted that the housing of signs by local councils was only put forward as an option, not a requirement, as some councils had expressed an interest in doing this. The issue of deposits was also only a suggestion of how to facilitate the save return of signs after use and was not a fixed policy.

The council was also "pleased to hear that local arrangements would be accommodated although am mindful that the same will not be recorded within the framework."

Consultation response 13

"At a meeting of the Town Council last night (Thursday 24 June 2014), the abovementioned consultation was considered. At the meeting my Council resolved that it notes and supports the contents of the documents."

Consultation response 14

"Concerns were expressed about using event management services particularly for non-profit events"

There is no requirement to use event management services for any event, they are just one option available, small events can borrow signs and have Traffic Management plans agreed and implement themselves. If accredited marshals are required we are looking at the best way to facilitate training so that as many eligible people as possible can be trained (eligibility is at the discretion of the police).

"Members felt that the policy should be different for profit and non-profit/community events"

The County Council does not consider that it is workable to provide a different policy for different profit bases, the fundamental issue is that if an event is deemed to require a highway closure to allow it to proceed then the requirements to allow this to happen are the same.

Engagement with organisations such as UK Athletics and UK Cycling was seen to be key to the development of a successful LCC policy.

It is not the County Council's intention to open the consultation to other organisations, the policy is designed to provide a high level framework that will try and meet the needs of any and all events that will occur on the highway. A discussion with a running club demonstrated that they have events that may not require closures and as such a lot of the "closure" section of the policy is not aimed at them. However the County Council as the highway authority would still want to be aware of the event to ensure that there are no conflicts on the network (Road works unknown to the organiser or another event wanting the same highway space).