

Appendix D – Consultation Responses

Consultee	Comments	Response
Lisa Ommanney (Attitude is Everything)	The policy provides a good signpost for equalities issues. Feel free to include links to our website.	Actioned.
Jane Wildblood (Corporate Sustainability Manager)	Add an index and executive summary highlighting Council's overall approach to events and highlighting key issues.	An index will be added. Officers will review the need for an executive summary.
	Might be difficult for community organisers to understand the language/navigate such a big document.	Online 'Event Planning Toolkit' will provide an accessible user guide to the policy. This will go live once the policy has been ratified by O&S.
Cllr Charles Gerrish	Amend definition of a 'major event' so it catches events like the Keynsham firework display which causes issues with cars being parked illegally.	<p>This definition was obtained from the Safety Advisory Group Training Programme and has been adopted by a number of local authorities across the country.</p> <p>However, web guidance will be amended to include a 'best practice' section on encouraging the use of public transport/managing parking. This will be produced with input from Parking Services.</p>
Robin Wood (Senior Trading Standards Officer)	Amend paragraph 29 to say organisers must consult the SAG 'at least 2 months before the event' instead of 'at an early stage'.	Actioned (now paragraph 30).
Dorothy Miley (Parking Services Manager)	Add to Annex 1 – Six months before: 'Apply for towing and removal of vehicles from roads that will be closed for the event (if applicable)'.	Actioned.
Imogen Coles (Environmental Health Officer)	Fully explains the multi-agency approach with good info/contact details about those agencies. Equalities has been covered well.	N/A

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Mark Williams (Principal Building Control Surveyor)	The order of 'Regulatory Requirements' seems quite random.	Put into alphabetical order.
	<p>Add a paragraph to 'Regulatory Requirements' about Building Control and temporary structures (suggested wording provided):</p> <p>“Organisers of events who intend to erect temporary structures such as grandstands, stages, lighting, sound or control towers, tents, marquees or canopies etc should contact Building Control well in advance of the event and provide sufficient details including layout plans and construction details/calculations to enable the structural stability of the structure to be verified. The Building Control section will check the information provided and undertake inspections to ascertain the structural stability of any significant temporary structures.”</p>	Actioned and a bullet point regarding temporary structures has been added to Annex 1.
Andrew Jones (Environmental Monitoring and Licensing Manager)	Paragraph 24 (performing animals) – They should come to Licensing for this.	Licensing will only have details of performing animals whose owners live in B&NES. No need to amend.
	Paragraph 1.1 – Remove reference to flower show as it's not happening this year.	Actioned.
Cllr Ian Dewey	Looks good – but a little too long.	Web-based 'Event Planning Toolkit' will be more accessible.
Ben Hardy (Richmond Events Management)	Provides a useful terms of reference for events in Bath in one readable format. May need to be updated when the new Event Safety Guide is published by the Health and Safety Executive.	Guidance will be reviewed when new document becomes available.
Alan Bartlett	Paragraph 55 – Why is Charlotte Street singled out?	Amended heading from 'Charlotte Street Car Park' to

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(Principal Licensing Officer)	Seems strange that the other car parks are not mentioned.	'Council-owned Car Parks' (now paragraph 56).
Cllr Roger Symonds	The SAG meets one week before an event – this seems too short a timescale.	Emailed Cllr Symonds to clarify that the SAG meets around two months before an event; the organiser must provide their event management plan one week before the meeting.
Paul Meyers (MSN Chamber of Commerce and event organiser)	<p>TRAINING: anyone running an event should be offered/encouraged to go on a course where the B&NES Events Policy is explained. For Major events I think if possible it should be compulsory - even if you have to make a charge. From my own experience I think hundreds of hours of officer time is wasted as people organising events muddle through.</p>	This may be an option for the future, however, resources currently do not allow for a new training course to be developed. In any case, organisers of major events are expected to obtain their own expert advice.
	<p>STARTING POINT APPLICATION: There should be a first stage application to B&NES which could then be copied to all departments to alert key individuals. This would also enable the creation of an events log that organisers could refer to in order to avoid a clash.</p>	Major events will be channelled through the Future Bath Plus Public Events Panel which should ensure key individuals are alerted.
	<p>B&NES 'ACCOUNT CONTACT': A B&NES facilitator should be allocated to all major projects once they have been 'logged' - possibly from Policy and Partnerships. This would enable one person in B&NES within the process to 'ring an alarm bell'.</p>	TLC will be taking on a coordination role from May 2011.
	<p>GETTING HOLD OF FORMS: One of the hardest stages of organising an event within B&NES is identifying the right forms to fill out. Whilst these are available on the B&NES website there are so many you have to be experienced to start with in order to work out which one to fill out.</p>	The online 'Events Planning Toolkit' will make it easier to identify/download the necessary forms.

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	<p>MORE USER/CUSTOMER FOCUS: Given that the start of the events policy recognises that events do serve a public good, it is perhaps depressing that there is no feedback mechanism in the process to B&NES from organisers. Could there perhaps be a B&NES Events User Group which meet once a year to give feedback?</p>	<p>Recommendation to be made to the Future Bath Plus Public Events Panel.</p>
	<p>B&NES OWNED PREMISES AND NOT JUST BATH: I found trying to book the Recreation Ground for the Bath Night Walk a very long and protracted process. I'm not sure whether this is the place to raise it but I do think a more streamlined process is needed for such an important facility. Also in the event policy on page 32, Annex 2, the list of green spaces ONLY refers to Bath.</p>	<p>It is understood that the booking process for the Recreation Ground is currently being reviewed on behalf of the Trustees of the Rec Ground with the intention of appointing an administrator to improve the process.</p> <p>Annex 2 has been amended.</p>
	<p>QUALITY TIME SCALES: When submitting the starting point application or any form or report to the SAG it would be good if formal notification of receipt of the paperwork could be given along with the time scale for an expected decision. This sort of thing is provided by the Premises Licence/TEN process. Also publication of SAG meeting dates with submission deadlines for the documentation to get on the Agenda would be very helpful to event organisers.</p>	<p>Process will be changed to acknowledge receipt of documentation by SAG. SAGs are arranged ad hoc around upcoming events – when the SAG is notified of an event we set up a meeting and give the organiser a deadline for submitting the event management plan. However, a number of SAGs for 2011 have been pre-programmed and this information will be included on the website.</p>
	<p>SUPPLIERS: It may be a difficult one to accommodate, but on the basis that most organisers are using the same suppliers, is there some way that details can be shared. Although officers don't recommend suppliers once you get into the process you learn that for example Stuart Security or Archers Marquees regularly work in the area. In the training course couldn't suppliers somehow be invited to provide contact details without B&NES warranting their work?</p>	<p>Not relevant to this policy.</p>

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	<p>THE TERROR?: In terms of feedback I sense a culture developing whereby B&NES officers feel they need to impress upon organisers the seriousness of what they are taking on. Whilst I don't disagree, I have seen two outcomes of this approach. The first is terror where some organisers lose sleep and never want to get involved again. The second reaction is for organisers to simply switch off and ignore advice or even subvert the system. We need a culture which I think focuses on assessing risk, putting in place plans to minimize it and then recognise that issues will always arise i.e. a happy medium.</p>	<p>The 'Events Planning Toolkit' should make the processes seem more manageable and support event organisers through the system.</p>
<p>Kate Hobson (Waste Management Officer)</p>	<p>Add two additional links to Environment Agency pages to Annex 5.</p>	<p>Actioned.</p>
<p>Rachel Ward (Stronger Communities Manager)</p>	<p>Add spaces outside of Bath to Annex 2.</p>	<p>Actioned.</p>
<p>Mark Burton (Fire Safety Officer) and Denis McCann (Unitary Manager)</p>	<p>Page 5, to enforce compliance with the Regulatory Reform Fire Safety Order 2005. Page 28, Point (a) should mention the above guidance. Page 28, Point (b) should mention the other relevant publication i.e. Fire Safety Risk Assessment Open Air Events and Venues Page 39 contact details me first then Tim, as main point of contact. With correct extension numbers. Page 40 this link should direct people to the Open Air Events guidance.</p>	<p>Actioned.</p>

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<p>Henry Brown (Federation of Bath Residents' Associations)</p>	<p>Made a formal complaint regarding the brevity of the consultation process. Consultees only had one week in which to read the policy and submit their comments.</p>	<p>Request to O&S panel to note this complaint.</p>
	<p>Paragraph 2.1 (definition of a community event) – The definition currently refers to events run by charities or voluntary, not-for-profit, or community organisations. It should only apply to events run by a local organisation. An event run by a non-local organisation should not be classified as a community event.</p>	<p>Comments noted, however, officer recommendation is that definition remains the same.</p>
	<p>Paragraph 6.1 (definition of major events) – Currently refers to public events. The definition should include private events.</p>	<p>This definition was obtained from the Safety Advisory Group Training Programme and has been adopted by a number of local authorities across the country. SAGs were established as a result of Lord Justice Taylor's recommendations that local authorities set up groups to oversee and enhance safety at public events. The SAG has no mandate to look into private events, although those held on Council land will still have to complete a satisfactory risk assessment and comply with Council officers' recommendations, and licensing legislation would apply to many such events.</p>
	<p>Paragraph 17.2 ("Although individual traders will be subject to enforcement action if they operate illegally, the organiser has overall responsibility for ensuring that all activities taking place at the event are run in compliance with the law.") – This responsibility on organisers looks somewhat hollow if there is no sanction applicable to them. If there is a sanction, this should be made clear.</p>	<p>There is no sanction for organisers – enforcement action can only be taken against the traders themselves. We would like organisers to take responsibility for traders at their event but this is simply 'best practice' rather than a legal requirement (now paragraph 21.2).</p>

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	<p>Para 21.1 - We welcome this, and would be grateful if you would strengthen it to read:</p> <p>“Organisers are strongly encouraged to consult with local residents or businesses who may be affected by the event, either directly or through their representative organisations, and to address any reasonable concerns that are raised. In many cases the organiser will be making applications in connection to the event (such as for a premises licence or road closure), to which local residents and businesses can object. Consulting early and responding to reasonable concerns could improve the chances of an application going unopposed, and thus reduce the risk of delay.”</p>	<p>Actioned (now paragraph 12.1).</p>
	<p>Para 22(c) (restricting political events on Council land) – Should there not be some provision for outdoor political meetings, rallies etc?</p>	<p>Paragraph amended to apply only to extreme political parties (now paragraph 23 (c)).</p>
	<p>Para 50.1 (notices for road closures) – The heart sinks at your requirement for legal notices and plain English notices. Surely we are trying to declutter the city under the Public Realm & Movement Programme? The Council should be looking for a way to reduce the number of notices, not increase it.</p>	<p>This reflects the current position, however, the matter has been raised with the Traffic and Safety Team who are considering amending it to plain English notices only. They need to notify the public of this change, which will take some time. They hope to have completed this by the first review of the policy (now paragraph 51.1).</p>
	<p>Para 51.1 (letter drops for residents regarding road closures) – Please add: Where there are several households at one address, eg multiple flats in a converted house, a letter should be dropped for every household.</p>	<p>Actioned (now paragraph 52.1).</p>

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	Para 53.1 (requirement to remove signs, barriers etc after the event) – This should say something about enforcement action if signs and their fixings are not removed promptly.	The Traffic and Safety Team do not have powers to take enforcement action over this, and sanctions for littering can only be imposed where the person responsible is witnessed doing so. However, the applicant must make themselves known to local residents via the consultation process, so it is in their interests to leave the site as they found it (now paragraph 54.1).
	Para 55 (currently headed ‘Charlotte Street Car Park’, but refers to all Council owned car parks) – Should read Council-owned car parks.	Actioned (now paragraph 56).
	Para 56 (requirement for organisers to agree suitable alternative parking for residents subject to a parking suspension) – Please add at the end: including covering the cost of alternative parking.	There is no statutory authority to require this although in practice this may be included within the Council’s requirements for a particular event (now paragraph 57).
	Annex 2 (key Council owned open spaces) – This applies to green spaces only. It is not clear how control is exercised over non-green spaces such as the Abbey Churchyard, Kingston Parade and Kingsmead Square. It is not clear from your paper whether these count as ‘highway’.	Most such areas are classified as Public Highway (maintained at public expense) and control of formal events can therefore be exercised within the scope of this policy. Kingston Parade is owned by the Council and consideration is being given as to how best to control activities and events in this and adjacent areas.
	Annex 2 (permitted uses for key spaces) – Should there not be some provision for public outdoor meetings (political or not)?	Actioned.
Cath Humphries	Amend ‘Parks and Open Spaces’ to ‘Parks and Estates’. And add Environmental Protection contacts to contacts list.	Actioned.
Cllr Andy Furse	How does this tie in with Royal Victoria Park’s policy? Can we wait until the residents’ meeting regarding RVP so they can comment on the policy?	The RVP policy was passed several years ago and some of its content is duplicated in the events policy, but it does still contain useful guidelines on the use of the park. The events policy will provide a general

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		<p>framework for all events which the RVP policy will supplement with details specific to the park, such as limits on the number of days that can be given over to a particular activity.</p> <p>The policy needs to be finalised by Monday 14 March so it is not possible to wait until the residents' RVP meeting (which is Tuesday 15 March).</p>
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