

**French V (Vicky)**

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**From:** Ferguson I (Ian)  
**Sent:** 06 May 2005 10:45  
**To:** Barron WH (Bill); French V (Vicky)  
**Subject:** FW: Supporting Police; Protecting Communities

~~-----Original Message-----~~

From: Campbell, Bill  
 Sent: 05 May 2005 18:38  
 To: Ferguson I (Ian)  
 Subject: Supporting Police; Protecting Communities

Many thanks for the consultation paper on the above subject.

I realise that the deadline for submitting responses was 3 May and apologise for being slightly late. I hope nonetheless that you will be able to take account of the following comments, specifically in response to section 5: Marches and Parades.

Q21: I strongly agree that organisers should be required to give 28 days notice.

Q22: I agree that there may be limited circumstances in which a shorter notice period may be acceptable. I note the suggestion that this should be allowed where a factor giving rise to the desire to march could not reasonably have been foreseen but suggest that what should also be taken into account in permitting a march at shorter notice are the grounds on which the march has to take place earlier than 28 days hence. In other words, the organiser should not only have to justify the basis on which the desire to march could not have been foreseen, but also the reason why the proposed march could not reasonably be delayed in order to comply with the normal 28 day notice period. While I do not object to allowing shorter notice marches, I believe this discretion should be very much the exception and not an easy 'get out clause'. For that reason, the burden of justification placed on the organiser needs to be fairly onerous.

Q23: I agree that all organisations should be obliged to give notice of their intentions in order to ensure that the rights of those affected by their intentions are protected. I do not object to relieving undue bureaucratic burdens on organisers, provided that they give notice including as a minimum their intended routes, times and expected numbers attending.

Q24: I agree that a structured process for considering notifications is desirable. I would ask that public transport operators be given the opportunity to be included in the precursory meeting from week one onwards as processions very often entail alterations to bus services and it is in the public interest that as much advance notice as possible is given to the public as to how bus routes will be affected. Assessing what alterations are needed can take time, hence the need for early involvement.

Q25: I do agree that it is appropriate for wider views that those of the police to be taken into account by local authorities. While I recognise that the police have a unique responsibility in regard to safety and security, I do believe that decisions made on those grounds should still take account of their effects on other key functions, particularly the effect on public transport. This in no way diminishes concerns for safety and security, but sometimes relatively small adjustments to police recommendations can be made which do not undermine those concerns but do avoid undue disruption to public transport. While taking account of wider views is desirable, this should not extend to a duty on local authorities to take account of narrow self-interests. The framework should ensure that the views taken into account represent significant interests, including the maintenance of a public service such as bus services.

Q26: my response to Q25 partly covers Q 26 too. Rather than just referring to disruption to 'vehicular traffic', I think there should be a quite specific requirement to take account of the effect on public transport.

Q27: I strongly agree that local authorities should be able to impose conditions, having taken account of the anticipated effect of the intended procession. This should include discretion to restrict dates on which processions can take place in order to avoid the excessive disruption arising from simultaneous processions and to restrict the routes processions can follow.

Q28: I agree that the proposed form of code of conduct should be introduced.

Q29: I agree that the existing penalties should remain.

Once again, I apologise for replying late, but I do hope you will be able to take these comments into account.

Bill Campbell

Operations Director  
Lothian Buses  
Annandale Street  
Edinburgh