

Appendix 2

New Town and Broughton Community Council (NTBCC) PSMP Group submission of 21 July 2021.

The New Town and Broughton Community Council (NTBCC) PSMP Group met on Monday, 19 July to discuss the progress of work in each of the subgroups, and to make recommendations to the PSMP Full Group meeting on Wednesday, 21 July.

We believe progress has been made, particularly with regard to important economic, environmental and social aspects of public space management (though less with regard to area conditions) — but much work remains to be done, if we are to see a useful and effective document at the end of this process.

General points

1. It would be helpful to have a summary of current CEC practice for each section/subgroup.
2. We think planning regulations should be incorporated into the PSMP, so they are referenced into the principles and guidelines.
3. Area Conditions should include the Conservation Area Character Appraisals, as published on the CEC Planning Portal.
4. 'Proportionality' (as raised by Festivals Edinburgh) should be structured into the PSMP. In our view, this can only be achieved through well-drafted guidelines.
5. Ambiguity should be avoided in the PSMP. We should be clear who has authority to do what and under what basis. For that reason, we don't agree with the suggestion by Festivals Edinburgh to insert the words, "if appropriate" (in key principles for Application and Approvals, Area Conditions). Nor do we agree with the rationale that the council should be "responsible for assessing whether stakeholders should be engaged". Stakeholders should be engaged based on clear principles, in line with legal obligations not at the discretion of council officers.
6. When necessary, we should consult expert help. For example, a body such as Social Enterprise Scotland could advise us on how to draft a guideline on 'social value'.
7. Common Good, the Common Good fund and public benefit should be included in the PSMP. Transparency about the use of Common Good assets should be ensured. If an event takes place on Common Good land, there should be a clear obligation for organisers to demonstrate positive benefits for citizens.
8. In exceptional cases, when stakeholders, organisers and the council are unable to reach agreement, some form of independent arbitration should be available as a last resort.

We believe the PSMP should include guidelines that refer to the following subjects, here listed by subgroup:

1. Application & approval

permissions for commercial events in public space; organiser's obligations; obstructions (barriers, curtains etc) in public space; Common Good assets and the Common Good fund; public safety and security; transparency.

2. Area conditions

Should include 'Conservation Area Character Appraisals' (as published on the CEC Planning Portal) and similar documents

3. Engagement & communication

sharing information and transparency.

5. Economic

financial sustainability of events; community wealth building; determination of nett, as opposed to gross, economic benefits, included loss of public access etc.; monetisation of parks; investment; subsidies; Transient Visitor Levy (tourist tax); impact on local business (and opportunities for local business); dispersal of events across the city; trustworthy statistics; good employment practices; transport and accessibility.

6. Environmental

greenspaces environmental impact assessment requirements; environmental sustainability; carbon footprint; certification (by events industry council based on BS ISO 20120 standard); biodiversity protection; hard and soft standing regulations; heavy equipment and temporary buildings; air pollution (diesel & bio-diesel generators and other fossil-fuel powered machinery); noise pollution (maximum noise levels/monitoring concerts/amplification in public spaces); environmental impacts from travel to and from events; paper and plastics used in event advertising; street clutter; flyposting; waste and recycling; fireworks; legal obligations (as described in Conservation Area Character Appraisals and other documents).

7. Social

social impact on local residents; ensuring public access to public spaces; protection of personal green space (mental health etc); diversity: public space for different kinds of users; free entertainment in public spaces; definition of 'community events'; complaints hotline service; capacity and overcapacity of venues; vandalism, litter and graffiti; toilets.

Thank you and best regards,

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