

**CITY OF EDINBURGH COUNCIL**  
**CULTURE AND COMMUNITIES COMMITTEE**

**Item No 3**

**13 December 2022**

**DEPUTATION REQUESTS**

<b>Subject</b>	<b>Deputation</b>
<b>3.1</b> In relation to Item 7.1 on the agenda – Use of Public Spaces for Events and Filming Update - Report by Executive Director of Place	<ul style="list-style-type: none"><li>• Joint request on behalf of New Town and Broughton Community Council and West End Community Council (written submission provided)</li><li>• LS Productions</li></ul>
<b>3.2</b> In relation to Item 7.6 on the agenda - Park and Greenspace Investment – Report by Executive Director of Place	Living Rent -Leith Branch (written submission provided)



*New Town and Broughton Community Council (NTBCC)  
Deputation to the City of Edinburgh,  
Culture & Communities Committee,  
13 December 2022*

*'Use of Public Spaces in Edinburgh for Events and Filming'*

## **1. Involvement of NTBCC**

The New Town and Broughton Community Council (NTBCC) have participated in every stage of the development of the *'Use of Public Spaces in Edinburgh for Events and Filming'* from 2020, when it was known as the *'Public Spaces Management Plan'* (PSMP), to today's committee meeting.

During the *'collaborative engagement'* of October 2020 to January 2021, we contributed written key principles and guidelines. During the *'working groups'* stage of April to July 2021, seven NTBCC members participated in the seven groups. Every group had at least two NTBCC members, as we each covered two or three groups. We were also of course individually involved in the public consultation from September to December 2021.

At the end of the public consultation we made a 15 page public statement, the culmination of previous submissions made in January, June and July 2021 (which is in the appendix).

## **2. NTBCC produced content**

Here is a brief summary of our work.

At the *'collaborative engagement'* stage, we contributed to the following **key principles** or main themes: area conditions (the special circumstances of particular places such as Princes Street Gardens or Calton Hill), carbon neutrality, heritage, noise, and the distinction between residential and non-residential areas.

NTBCC also suggested 17 **guidelines** to address specific issues: access to parks, sound levels at music events, fireworks, public safety and venue overcapacity, environmental impact and impact on surroundings, carbon footprint, green certification for events, use of heavy equipment and temporary buildings on soft surfaces, onsite generators, pesticides, public art installations, the responsible and accurate use of statistics and means of making complaints.

At the work groups stage, NTBCC made suggestions for the wording of key principles. I would like to highlight the following important ones:

Regarding **event application & approval, and area conditions** we said, *"Applications will be expected to follow the principles and guidelines. In exceptional circumstances an applicant may seek modification or departure from these principles ... The Council, after due consideration and taking account of comments, will not be obliged to grant the exception."*

This text appears as Item 4 of Appendix 2 of the report, but if all the guidelines – which are entirely missing from the report – have been removed, it will be less effective.

Regarding **consultation** we said: *"There should be open and transparent sharing of non-confidential information and consultation. . . consultation can provide comment to be taken into account; while this will not automatically veto an event or filming, stakeholders will be entitled to an explanation where their views are not upheld."*

Note the words "not automatically veto". Regarding item 4.12 in the report, we emphasise we have never asked for, or indeed discussed at any time, a vote or veto of any kind.

Regarding **social value**, we said: *"Social added value should be recognised and explicitly factored into decisions. ... Proportionate Social Accounting should be used as a tool. Social accounting is the process of communicating the social and environmental effects of organisations' economic actions to particular interest groups within society and to society at large."*

Regarding **contracts and reporting**, we said, *"NTBCC feel that this principle should make it clear that 'commercial confidentiality' is inapplicable to events contracts . . ."*

Finally our suggested text on **carbon neutrality**, appears as Item 15 of Appendix 2, but without the reinforcement of the guidelines we suggested on environmental impact, carbon footprint, green certification for events, onsite generators and fireworks etc.

Turning to the public consultation stage, NTBCC participated as individuals and as a group with the NTBCC statement (as explained above).

We were originally impressed with the thoroughness, and attention to detail, of the organisers of this work, but disappointed that the work groups looked at key principles while omitting the guidelines. Moreover we were disappointed that the publication of the results of the consultation was delayed until 7 December, and indeed that the stakeholders have had no further contact with the work after the consultation.

### 3. NTBCC motivation

Why have NTBCC spent so much time and energy on this?

Community Councils are statutory bodies, the most localised level of local government. We get involved in everything that happens in the city centre. In recent years there have been many issues that have come to us, invariably on a case by case basis. We have been fire fighters.

Each year we produce an increasing number of submissions and statements – during 2021-22 we made 17.

We would prefer a more orderly, rules-based system that provides greater clarity for everyone – for event organisers, for the council, for interest groups and for residents – so we can concentrate on major, rather than lots of minor, matters.

So we would like to see the ‘Use of Public Spaces in Edinburgh for Events and Filming’ as a clear, accessible, practical, above all useful, manual of reference.

### 4. Tests for ‘Use of Public Spaces in Edinburgh for Events and Filming’

We believe ‘Uses of Public Spaces’ should meet five tests:

1. Contribute to the **good management** of our public spaces.
2. **Balance the interests** of residents, the council and event organisers in ways that are fair and reasonable.
3. Encourage the use of the **right spaces for the right events**, while sensitively distinguishing between residential and non-residential areas.
4. Achieve **consistency with all other CEC policies**, especially those for climate change mitigation and the social and natural environment.
5. **Be presented in a form** that is accessible and usable by all involved.

NTBCC strongly support the creation of a management system for the ‘Use of public spaces’ however it’s clear the tests have yet to be met.

The report’s Appendix 2 ‘Delivering the Key Principles’ is largely self-referential – a document by the council for the council, which doesn’t address stakeholders. To our knowledge, a number of the 17 ‘key principles’ were not discussed, or not regarded as principles, at earlier stages: No. 11 (a minimal reference to ‘disruption’), and particularly

Nos. 12 and 14 about 'reinstatement' (which read more as a licence for the controversial use of soft-surface public space, than a principle of protection).

So we also ask councillors to apply these five tests. If you believe they have not been met – *and you have had far more time than NTBCC to ponder this document!* – then we would recommend sending the report back for revising and strengthening.

#### References

NTBCC Statement on the '*Use of Public Spaces in Edinburgh for Events and Filming*' Consultation, ending 15 December 2021. See Appendix A (below).

NTBCC  
12 December 2022

*Endorsed by:*  
*Old Town Community Council*  
*Tollcross Community Council*  
*West End Community Council*

## ***Appendix A***

### ***NTBCC Statement on the 'Use of Public Spaces in Edinburgh for Events and Filming' Consultation, ending 15 December 2021***

Many public events happen within, and around, the area of the New Town and Broughton Community Council (NTBCC).

Members of the community council contributed many texts and comments, written during the 'collaborative engagement' stage of what was then the 'Public Spaces Management Plan' (October 2020 to January 2021).

These included NTBCC's contributions to the key principles: area conditions, carbon neutrality 2030, heritage, noise, and residential-area public spaces.

Moreover NTBCC contributed the following guidelines: access to parks and greenspaces, carbon footprint, certification, complaints hotline service, fireworks, greenspaces environmental impact assessment, heavy equipment and temporary buildings, impact on the surroundings, onsite generators, overcapacity events, pesticides in public spaces, public art installations, reflecting Edinburgh, rest periods from events and activities, sound levels at music events, statistics, and use of space for different users.

We published an 'NTBCC Statement for the City of Edinburgh Council Public Spaces Management Plan 'Collaborative Engagement' January 2021 (Stephen Hajducki for NTBCC) as a summary of our position at that time (see Appendix 1).

Members representing NTBCC attended each workshop stage workgroup (April 2021 to July 2021). At the end of that process we wrote a New Town and Broughton Community Council (NTBCC) PSMP Group submission of 21 July 2021 (see Appendix 2).

The NTBCC 'team' have held frequent meetings to exchange opinions. NTBCC have been more involved, and arguably have more experience of, and expertise in, public events than any other citizen or community group in Edinburgh. Accordingly we hope our conclusions in this submission will be read and considered.

Comments on the individual topics covered by the workshops are as follows:

#### **1. Application and approval**

NTBCC welcome well-managed events which reflect the character of our city and contribute socially, aesthetically and economically. We do not require intrusive over-scale interventions beyond the city's capacity to accommodate without detriment.

At present there is a bewildering array of permissions required (or not) which do not always seem to be submitted or enforced. CEC should therefore simplify the application process so that all events are advertised (as per planning proposals), consulted on, and screened for suitability – their impact on the environment, residents, businesses, transport etc.– with streamlining for small local community events. Events which fail to meet acceptable requirements should be refused. [Stephen Hajducki]

## **2. Area conditions**

We agree that, in addition to the overall scrutiny of proposals for events outlined above and in subsequent parts of this response, it would be helpful to organisers and affected parties for more area-specific conditions to be imposed where they are relevant to particular locations.

These should include requirements to address impact on the cityscape, including conservation areas and skylines; proximity to residential properties in terms of noise, disturbance, parking management; protection of the green environment; compliance with the city's green / climate change and pollution agendas including power sourcing; and neighbourhood social and economic impact, particularly in respect to benefit for the local community and small businesses. [Stephen Hajducki]

## **3. Engagement and communication**

NTBCC would hope that engagement and communication is first and foremost as open and transparent as practically possible. Whilst we accept that proportionality (e.g. to scale of event and impact) is also a consideration, this needs to be applied consistently and with care.

NTBCC also support engagement at the earliest opportunity, ideally to all those who may have an interest in it, through a medium that is as accessible and inclusive as possible.

As with planning applications, engagement would provide comments to be fully considered in decision-making; with stakeholders being entitled to an explanation where their views are not upheld. [Richard Price]

## **4. Filming**

Officers must recognise that it is not a given that all filming should take place if it does not benefit Edinburgh communities. Increased future over-tourism is not a good measure of success. Minimising disruption to residents is not enough when considering filming: diversions and the loss of amenity may make residents late for caring responsibilities, work, or for missing travel connections. Therefore, good engagement / communication is essential prior to filming starting. Using social value and community wealth building approaches should maximise a positive legacy through training and employing a diversity of local people and businesses, and spending that stays in Edinburgh. [Deirdre Henderson]

## **5. Economic**

Pursuit of revenue streams by the council from commercial use of public spaces are not necessarily compatible with other objectives. The key principles and guidelines need to reflect these competing requirements, specifically the costs/benefits of: the true financial costs of making public spaces available; loss of access to public spaces; the economic and social costs/payback for local communities and businesses (community wealth); accessibility and transport links to events; site restoration; compliance with environment and employment policies; and the frequency with which adverse impacts are imposed on communities. To apply the principles and guidelines a proper model for assessing economic/social costs and benefits must be employed. [Peter Williamson]

## **6. Environmental**

NTBCC hope to see the publication of key principles and guidelines which provide environmental protections and consistent alignment with council policies on sustainability and carbon neutrality. These key principles and guidelines will need to be scrupulously observed.

In particular, standards for air, light and noise pollution — which cause annoyance to residents and harm to the natural environment — should be clearly and unambiguously defined. NTBCC believe certification and adherence to the ISO 20121 will help simplify maintaining appropriate standards by both the council and event organisers. [Simon Holledge]

## **7. Social**

NTBCC hope to see the publication of key principles and guidelines fully covering social value, which needs to be defined and used as a measure of the benefits to and impact on local residents as well as the wider Edinburgh community. This measure should be used to assess if an activity should proceed. The application process to incorporate social value should be proportionate to the activity.

We would like to see guidelines to ensure public access to public spaces, protection of personal green space (for mental health etc), diversity (i.e. public space for different kinds of users), definition of 'community events', and the management of 'social problems' such as vandalism, litter and graffiti, and the provision of toilets. [Simon Holledge]

## **References**

NTBCC Statement for the City of Edinburgh Council Public Spaces Management Plan 'Collaborative Engagement' January 2021 Stephen Hajducki for NTBCC. See Appendix 1.  
New Town and Broughton Community Council (NTBCC) PSMP Group submission of 21 July 2021. See Appendix 2.

Simon Holledge, Stephen Hajducki, Deirdre Henderson, Richard Price, Peter Williamson  
NTBCC, 6 December 2021



**Appendix 1: NTBCC Statement for the City of Edinburgh Council Public Spaces Management Plan ‘Collaborative Engagement’ January 2021**

We thank you for the opportunity to comment on this important subject and in particular appreciate the change to a more open form of consultation which allows suggestions to be aired and explored. This contrasts well with previous Council “consultations” which were often narrow, simplistic and too obviously designed to produce a pre-determined result which agreed with officers’ preferred proposals.

Our views can be summarised as follows:

- The management plan should be for spaces all the year round, not just for events
- Primary use is to be as open space, with events as occasional users
- Spreading events over a larger area of the city, consistent with protection of amenity
- Distinguish between community and commercial events; and note quality of events
- All commercial events to be subject to full consultation, not just notification
- Environmental protection and controlling impact
- Financial and economic impacts
- Robust and efficient management

All requirements / restrictions etc to be strongly enforced Detailed comments on each of these topics are set out below.

**Scope of Plan**

The current epidemic has shown the importance of access to public spaces for physical and mental well-being. The scope of the new plan should therefore extend to management and protection of these spaces overall, and not just to events within them. We understand that this concept has been favourably received by members.

This approach will also reinforce an appreciation of parks and open spaces as primarily recreational and leisure spaces accessible to all, with only occasional events held within them, rather than being unavailable for extended periods. When major events are taking place, other spaces should deliberately be kept clear to achieve a balance – for instance, during the International Festival and Fringe, there should be no major events in Princes Street Gardens so as to provide an oasis of calm and quiet to counter frenetic activity elsewhere.

We agree that there is scope for extending activities beyond the central area, providing the identified spaces are adequate in size, have good public transport links and mobility-challenged access to avoid intrusive traffic and parking in neighbouring streets, and that the nature and management of the activity ensures minimal impact on local residential properties in terms of noise, crowd control etc. It may also require CEC to pre-install access paths, electrical, water and drainage services to minimise disruption and pollution on sites identified as suitable.

### **Types of Events**

The type and quality of events must reflect the character and scale of Edinburgh as a city and its heritage, and must contribute to it socially, aesthetically and economically. In the past there have been advocates for ever-increasing levels of intrusive tourism and festivals way beyond a small city's capacity to function and absorb without detrimental effect on its fabric and inhabitants; indeed, some supporters appear to regard "punching above its weight" as a virtue rather than the problem it actually is. The "Thundering Hooves" concept, even if it was ever valid, is now outmoded and unacceptable as a future direction. The PSMP offers an opportunity to correct this approach.

Approvals must also require quality materials and detailing commensurate with the city's ambience. We agree that installations for events should support and reinforce the special 'place' quality of their surrounds, and organisers should therefore define in their application the measures they intend to take to achieve it, particularly in the World Heritage Site. Temporary installations should not be erected close to monuments, iconic views should not be blocked, streets should not be overwhelmed with advertisements and clutter.

In addition to its failure to meet acceptable standards of local consultation, the current "Spaces for People" programme exhibits all the wrong ways to effect even temporary changes – plastic barriers and bollards, mesh fencing panels, elements haphazardly selected and laid out, crass signage. Edinburgh can do better than this, and deserves to do so.

The approval process should distinguish between community events, run by local charities, residents and business groups, and commercial events run by for-profit organisations or those charities which nonetheless have highly paid executives, and are essentially major fund raisers not intended for local initiatives.

Small non-intrusive community events should have a simpler permissions process and lower charges to reflect their social value. Commercial events must be the subject of full consultation, not just notification as currently suggested. Merely "notifying" local organisations and relying on a "check-list" approach to be filled by the event organiser is not sufficient. The notification procedure used for planning applications – a fully-detailed application, published on a weekly list, advertised, advising to local community councils and other bodies, setting out proposed mitigation measures to avoid local impact, showing compliance with other standards such as construction and safety, and then reporting back to an open committee with a recommendation – would be an appropriate and workable model. There are actually relatively few major events annually to which this would apply, so they would not impose an increased burden on council resources if an appropriate fee is charged.

### **Controlling Environmental Impact**

We agree with the view that "Edinburgh's public spaces should be used in a way that enhances the city's cultural identity, reputation and quality of life". Proposals which fail to demonstrate this should be dismissed at the application stage. While we would not wish to descend into small-town parochialism, the drive to "internationalise" the city's tourism and events must be balanced by a

realistic appraisal of how much can be absorbed without detriment.

All events should require an environmental impact assessment. This might be minimal for local community events which do not introduce any structures or fixtures, but would be significant for larger events or those with a prolonged duration. The assessment should cover greenspace protection including surface and sub-surface impacts (damage to walls, banks, drains, compacted soil etc); vegetation damage to trees, shrubs and grass; biodiversity impacts to all significant forms of life from animals to micro-organisms; as well as air, water, noise, and light pollution, controlling anti-social behaviour (i.e. littering, graffiti etc); and should set out remedial or mitigating measures as well as proposals for subsequent reinstatement. A bond should be lodged to ensure the site is promptly returned to its original state after the event.

The city has an ambitious Carbon Neutral target, and it is imperative that organisers submit estimates of their carbon footprint – including all associated travel and manufacture. Carbon offsets which transfer pollution elsewhere are not acceptable. Diesel-based and other polluting generators should not be used; all events should use mains electricity or “green” generation.

Major concerns in recent years has been the damage to green space by structures compacting the ground and obstructing water flow to tree roots; and the extended recovery time after clearance before the area is again usable by the public. Other European cities restrict Christmas Markets, funfairs or similar installations to hard landscaped areas. The PSMP should impose a blanket ban on any heavy structures on soft landscape.

Noise levels have been a major concern in past events, especially city-centre concerts, both for nearby residents and for attendees. A requirement should be that specific restrictions based on scientific monitoring be agreed and adhered to.

### **Financial and Economic Aspects**

The pressure to raise some income from assets such as parks is understandable, but this should not override the protection of environment and amenity. All income from events should be visibly used for the maintenance of parks and spaces, and not diverted to “administration” or other council expenditure or causes.

Organisers of commercial events should be asked to show what benefits their events have for local residents and support for local businesses. If they cannot do so, or if the benefits go primarily to outside interests, their applications should not be approved.

While grants might be given for local events, in no instances should CEC pay commercial operators to put on a festival. All costs must be met by the organisers, through sponsorship if necessary, and any surplus after deducting reasonable fees should be reinvested in the maintenance of the space.

It should be noted that considerable areas of public realm in Edinburgh are Common Good Land, and there are consequent restrictions on uses and therefore a requirement for a stringent open and transparent process. An independent trust should be appointed to manage all such land.

All commercial events must demonstrate that they are fully compliant with CEC's Modern Slavery charter, and that all staff are paid at least the National Minimum Wage. Sufficient funding should be lodged beforehand with a third party to ensure this.

Unsubstantiated and exaggerated claims for the value of certain events to the city have been made by their organisers and their apologists with no explanation as to how the figures have been calculated. In future all such claims must be transparent and grounded in reality. All commercial events must make their accounts open and available. They should identify who receives the benefits – whether they support local businesses and organisations, or if they are creamed off by parties who do not have any beneficial connection with the city.

### **Robust and Efficient Management**

We agree generally with the “Guidance on Managing Activities and Events in Public Spaces” set out in the consultation document, with the provisos noted above concerning proper consultation rather than mere notification to community councils and affected parties; and distinguishing between community and commercial events.

Each space or venue should have a stated maximum capacity which should not be exceeded in ticket sales or persons admitted.

Currently responsibility for various aspects of the process is divided between different functions who do not always appear to communicate. While the individual expertise of specific departments is recognised – eg building standards and safety – there should be a small co-ordinating team to process the applications, drawing together departmental and community comments and advice and ensuring all permissions, financial bonds etc are in place before reporting back to the members.

To enable a full assessment of each proposed event, full details of impacts arising should be included in their application. The application should cover the points raised above, and also:

- o Safety issues – including building warrants and compliance certification
- o Full insurance risk cover
- o Certification, delivered by external independent assessors
- o Transport and accessibility
- o Parking disruption for staff, visitors and local residents and businesses
- o Fireworks
- o Public Conveniences and Welfare
- o Waste and Recycling
- o Flyposting

We agree that the obligations for an intending organiser need to be made clear and agreed before any event starts, including all permissions and licences. To this we would add consultation and genuine dialogue with affected stakeholders and a demonstration of willingness to resolve any issues.

Given past concerns, there must be a stronger vetting process for event organisers, particularly those who have caused previous problems such as:

- o leaving unpaid accounts with the Council or city businesses
- o failing to apply for necessary planning and other permissions
- o not meeting basic requirements on safety, noise limitation, adverse impact, crowd control, modern slavery requirements
- o not demonstrating any local benefit or actually diverting income away from established businesses
- o failing to take immediate remedial action when complaints have been raised
- o being in receipt of council funding and then diverting any profits elsewhere
- o showing lack of consideration for or co-operation with neighbours

Where it is nonetheless decided to entertain an application from such organisations, there should be a large advance deposit as guarantee of 'good behaviour' before consent is granted; and which would be forfeit if problems arise.

### **Enforcement**

All requirements and restrictions need to be strongly enforced to minimise problems. This is an area in which CEC is generally weak. It is essential that there is an easily contactable 24-hour single point of complaint, backed up by a fast response team to undertake remedial action. This could be part of an overall review of effective enforcement within all functions of the council.

### **Other Measures**

Edinburgh has a high city-centre residential population which contributes to its success, but there is a clear conflict between protecting amenity and accommodating large music concerts with issues of noise, crowd control etc. It must therefore be recognised that at present the city simply cannot always host these without unacceptable impacts. Therefore the PSMP should also look at encouraging other appropriate facilities which are currently lacking – eg a potential 7-10,000 seater stadium / sports centre at a suitable location such as Inghliston. The PSMP should not be a substitute for avoiding a holistic approach to managing events within the city.

We note that many of the points raised at this stage require more detailed work to make them practical. We would be pleased to comment further on these as they develop, and also to see the draft of the application form when it is ready.

*Stephen Hajducki for NTBCC, January 2021*

### **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.

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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.

**4. 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.

**5. 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).

**6. 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.

*Simon Holledge,  
NTBCC Engagement Officer/PSMP Coordinator*



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9 December 2022

The City of Edinburgh Council  
City Chambers, High Street  
Edinburgh  
EH1 1YJ

Dear Culture and Communities Committee members,

We write to you as the Leith branch of *Living Rent*, Scotland's Tenants' Union, to voice our concerns about the lack of lighting across the whole of Leith Links park and to ask you to implement adequate lighting in the park as a matter of urgency.

Public parks and green spaces are important social resources for the community, and the people of Leith have a right to a park that is safe and accessible for all. At the moment, significant stretches of pathway in the Links are completely unlit. Though we note that the Council has committed in its "[Leith Links Masterplan](#)" to some improvements to the park over the next decade, we consider this to be an urgent issue; we therefore call on the Council to take notice of this oversight and take *immediate* steps to correct it.

We call on the Council to ensure the provision of lighting in Leith Links park be improved as a matter of urgency, particularly along the pathways running from Salamander Place to Somerset Place; from Fingzies Place to the children's playpark; and in the midsection of Leith Links East, all of which are completely unlit. We request that this be included in the analysis of lighting in all parks currently being commissioned.

Living Rent has campaigned throughout the last six months on this issue and it has become clear how important it is to our members and the wider community. 559 of our members and other local residents have signed a petition calling on improved lighting on the Links, and the level of attendance and engagement with our 'The Dark is Scary – Light up Leith Links' action on 30<sup>th</sup> October, including that of several City Councillors, demonstrated the level of support for this campaign in the Leith Links area.

### **Safety**

Local residents and Living Rent members, as well as community groups such as *Strut Safe*, have raised concerns around personal safety when walking through the park at night. A well-lit park will give pedestrians greater confidence to walk through the park after sundown. This is of particular importance to local residents working late shifts who use the park as a thoroughfare, especially women and vulnerable people, who may feel unsafe doing so at night given [recent instances](#) of violent assault in the park.

Research by the University of Sheffield's [Lighting Research Group](#) has highlighted the benefits of adequate lighting for pedestrians and cyclists. Properly-lit parks allow members of the



community to make use of their spaces in the evenings and winter months. Effective lighting helps to improve public safety and security, and reduce the risk of accidents and injuries, for cyclists and pedestrians alike.

## **Accessibility**

Leith residents have cited trip hazards on dark footpaths as a significant concern, particularly for those with visual and physical impairments. As a consequence, the insufficient lighting in the park means that large parts of the Links are practically inaccessible during much of the winter months for many people. As the park hosts many community events, we believe that it should be accessible for all members of society.

The Council's [Open Space Action Plan](#) requires all homes to be within walking distance of an accessible large greenspace. We note with regret that in the Council's Park Quality Assessments 2021, Leith Links was ranked 117th out of 141 parks in Edinburgh, making it the lowest ranked of the city's six "premier" parks; it also remains below the "Good+" standard. This means a large number of homes around Leith Links are deficient in terms of access to a large greenspace by the Council's own metric, including some areas identified as within the [20% most deprived areas in Scotland](#). We believe improved lighting in the above-identified areas of Leith Links would significantly increase the accessibility of the park to residents and the park's quality as a whole.

## **Community**

Lighting goes beyond illumination. Public spaces such as parks play a vital role in the social and economic life of a community. They are meeting places, playgrounds, and essential sources of exercise. Providing respite from the bustle of city life, green spaces can often be greatly beneficial to residents' mental health. While recognising that the wider environmental impacts must be taken into account when planning such improvements, proper lighting can often enhance the natural beauty of green spaces, which, we note, is a key consideration for the Council's Masterplan for the Links.

Given the reasons above, we ask that the City of Edinburgh Council makes Leith Links a safer, more accessible and inclusive public space, by introducing new lighting on those sections that have been neglected. We believe doing so is vital to the wellbeing of our community, and Living Rent will be campaigning over the coming months to ensure that our members' views on this issue are heard.

Signed,

**Living Rent Leith Branch**