To - The Clerk
Finance and Constitution Committee
Scottish Parliament
Edinburgh
EH99 1SP

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From - Leith Creative
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PLANNING (SCOTLAND) BILL

Introduction

1. Leith Creative is a place-based research project co-delivered by Citizen Curator and LeithLate. Leith Creative welcomes the opportunity to comment on the Planning (Scotland) Bill Financial Memorandum.

2. Our main concern relates to the estimation of costs concerning Local Place Plans set out in paragraphs 55-61 of the Bill's accompanying Financial Memorandum. We explain the background and reasoning for that next. Brief answers to the Committee's consultation questions are also set out in the Annex to this submission.

Background

3. Leith Creative recently completed its People and Places: Make Leith Better project, funded by the Scottish Government Design Charrette Fund and Creative Scotland, with support from the City of Edinburgh Council. It featured a programme of wide-ranging community engagement delivered through both on-line and face-to-face surveying, creative public place-making activities, a series of focussed round-table charrette conversations – structured across our creative hub and community network; and a two-day community conference, all within the EH6/EH7 locality.

4. The primary output was the Leith Blueprint – a map and a report which we invite the committee to view at;

and
Reasoning

5. In many respects, our project can be compared to the evidence-gathering component of a Local Place Plan although the process is not “fixed” - see the Bill's Policy Memorandum para. 77. Not including voluntary contributions, our estimated cost for the Leith Blueprint work is £46,000.

6. The other reason we see a connection with Local Place Plans is that we have been successful in being granted further funds (£35,000) from the Scottish Government's Making Places Initiative 2017-18 announced on 3 January 2018 as follows:

- Leith - Citizen Curator & Leith Creative - Develop and pilot a People's Place Plan for Leith, following the successful Leith Blueprint which created a community 'main issues report'.


“This will provide:

1. Support for communities keen to develop their understanding of place and build their skills and confidence.

2. Grant funding to support communities to participate in and lead design events, such as workshops and charrettes.

3. Support for communities to help deliver ideas produced in previous community engagement processes.

Projects coming forward to access support should be focussed on tackling inequality, and will have a clear impact on combating disadvantage through community-led and place-based working.

The prospectus further explains that:

There will be a particular focus on community design processes that pilot or support potential models to support the development of local place plans (our emphasis).

Local Place Planning

The Community-Led Design fund particularly encourages applications from projects that pilot or support potential models to support the development of local place plans. The independent review of the planning system (May 2016) recommended that communities are empowered to plan their own place, and that those plans have the potential to form part of the statutory development plan. There is no set format to a local place plan and the Making Places Community-Led Design fund aims to explore the challenges and opportunities arising from the preparation of these community-led plans.”
8. Leith Creative’s work can be seen as a positive, although we appreciate not the only way, of approaching local place planning as envisaged by the Bill. We expect our output to be a People’s Place Plan.

9. We are also very well aware of the efficiencies and opportunities arising between planning and Community Empowerment (CE) legislation including;
   - the potential connections between Local Place Plans and Locality Planning (CE) and
   - the connections between Local Development Plans and Local Outcome Improvement Plans (CE)

10. Those connections are also referred to in the Bill’s Policy Memorandum (para. 76). We are working with local partner organisations in those regards.

11. Given our costs and indeed the central funding provided to Leith Creative so far, and referred to above, (please also note that it is necessary that communities secure match-funding to forward initiatives - for Making Places we should have this in place by the end of March 2018), our assessment is that the Financial Memorandum underestimates the likely cost of a Local Place Plan. While we appreciate each opportunity may vary in approach or scale, People and Places: Make Leith Better cost considerably more than the monetised cost of £13,000 estimated in the Financial Memorandum for a Local Place Plan. In addition, we also made use of practical and in-kind assistance such as local venues, marketing support and, where appropriate, voluntary contributions. These are essential elements if you wish to work with residents and develop genuine engagement. We are fortunate to be able to access these resources at little or no cost.

12. Given the connections to local place planning and the Initiative’s goal of tackling inequality, whilst acknowledging that there is no certainty, it is our view that the success of Local Place Plans will depend on the availability of funding and realistic estimates the reof, even without taking into account the requirement for capacity-building (a monetised cost not acknowledged in the Financial Memorandum at para. 58) particularly in the most disadvantaged communities. Leith is by no means the most disadvantaged community in Scotland, there is identified local capacity alongside the long-term deprivation and inequalities the Making Places Initiative aims to tackle.

13. In our opinion, costs could considerably exceed £13k in many cases, which may either see a reduction in the estimated number of Local Place Plans being brought forward as the available funding is reduced more quickly than anticipated, compared to the estimates in the Financial Memorandum (Table 1 - 10-year estimate of £11,960,000). A further unintended consequence may be that higher costs will frustrate community buy-in and the front-loaded plan-led system the Bill’s proposals are intended to introduce.

14. It may therefore be that the cost estimates should be recalculated or publicised within a range, or the number of LPPs coming forward be reassessed.
Summary

15. These comments are provided to give some financial context from our experiences and the all-Scotland position concerning Local Place Plans. It is too early to say, given the stage the Bill is at, whether Leith Creative will be the actual or only community lead on any formal Local Place Plan until the legislation unfolds and other partners collaborate or compete. This could be true of other places in Scotland too.

16. Leith Creative hopes these comments are helpful and agrees to this submission being made public.

17. For information, Leith Creative will be making separate broadly supportive comments about Local Place Plans in answer to the Scottish Parliament Local Government and Communities Committee’s call for evidence about the Bill.

Yours faithfully

Duncan Bremner and Morvern Cunningham

Leith Creative - 26th January 2018.
Annex

Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

No.

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

N/a.

3. Did you have sufficient time to contribute to the consultation exercise?

Yes.

Costs

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.

No. See body of our letter.

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

Possibly not. See body of our letter.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

Possibly not. See body of our letter.

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise?

No comment.

Wider Issues

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?
Yes, but with some underestimation of costs. See body of our letter.

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

No comment.