

New Town & Broughton Community Council Response to 'Edinburgh Tourism Strategy 2030'

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Executive summary

- The Strategy does not provide adequate information to allow those responsible for its approval and implementation to understand the expected outcomes and thus required actions.
- The Strategy has been prepared in isolation with insufficient recognition of the overall goals of the Council in particular regarding climate change and improved health and well-being.
- The Strategy fails to address the real concerns of residents regarding the impact of current and forecast levels of tourism on Edinburgh.
- The level of consultation with the wider Edinburgh community and in particular Community Councils has been inadequate and is occurring too late in the development of the Strategy.
- There is a need to undertake a more thorough review of the Strategy to ensure it is compatible with the overall goals of the Council and the needs of residents.

Introduction

Unlike the previous strategy document *Edinburgh Tourism Strategy 2020*, produced by Edinburgh Tourism Action Group (ETAG), the draft *Edinburgh Tourism Strategy 2030* contains none of the growth targets that were part of its predecessor. Indeed there is very little of substance in the draft *Edinburgh Tourism Strategy 2030*, beyond some very nebulous aspirations to develop an inclusive, sustainable and responsible tourism sector in Edinburgh. This appears to be a missed opportunity to set a meaningful strategy for the development of the tourism sector over the next ten years and in particular to respond to the frequently expressed concerns of residents about the impact of excessive tourism in Edinburgh especially in the City Centre.

Despite many references to the need to better balance the needs of residents and tourists, the level of consultation with residents has been poor. Although this project has been ongoing for nearly two years, it is only at this late stage that there has been any effort to ascertain the views of residents. There was one drop-in session provided which was not well publicised, and thus not well attended. The ETAG group has declined invitations to attend Community Council meetings to explain the new draft *Edinburgh Tourism Strategy 2030*, and answer questions on it. Indeed on the Council consultation hub questionnaire there is no specific mention of Community Councils, despite these bodies being established by **statute** to represent the views of their communities. This omission is a significant oversight and undermines the intended role of Community Councils.

This lack of consultation is not restricted to ETAG. Despite Edinburgh Council establishing a Tourism and Communities Working Group in 2018, made up of elected members and senior officers with a specific remit 'to ensure that the views and consideration of communities and residents are taken into account in the development of a new strategy for tourism', there is little evidence that this has happened. In particular, it is stated that 'the elected members on the group will represent communities and residents, liaising through engagement with statutory and non-statutory groups and networks including Community Councils and Residents' Groups'. Given the lack of willingness of ETAG to attend or otherwise engage directly with New Town and Broughton Community Council on this strategy, it is apparent that greater focus is required from the Working Group on broadening information sharing and improving consultation.

We note that the Old Town Community Council has responded to this consultation, by highlighting a number of deficiencies in the Strategy document and, in particular, the lack of any serious recognition of the adverse impacts of tourism on residents living in the Old Town part of the city centre. Many of the issues impacting Old Town residents also impact those living in the New Town and Broughton area including:

- Noise from events and visitors creates disturbance for people trying to live (and sleep) in areas with a high levels of tourism, in particular with significant 'night-time economy' activity.
- Waste from the large number of visitors in certain parts of the city creates high demands on the Council and private waste contractors responsible for its collection, which are too frequently not met resulting in much of the public realm appearing dirty and unpleasant.
- There are a large number of diesel vehicles transporting tourists to and around the city centre adding to the atmospheric pollution and carbon emissions in Edinburgh.
- The considerable uncontrolled growth of peer-to-peer self-catering serviced accommodation (including AirBnB) in Edinburgh has placed additional demands on the available housing stock in the centre of Edinburgh resulting in the displacement of residents and an increase in the cost of housing in the city centre.

None of these issues are effectively addressed in the Strategy which as noted earlier contains only aspirational statements but no real direction regarding the steps that need to be taken by the tourism industry to address these real concerns of residents.

With regard to the specific elements of the Strategy, our comments **and specific questions** are as follows:

1. We recognise the need for a new Tourism Strategy that can be used to guide the tourism sector over the next ten years. It is particularly timely given current concerns about the challenges posed by 'over-tourism' in certain parts of the City and at certain times of the year. This results in adverse impacts not only on residents and visitors but also on Edinburgh's unique heritage. The Strategy should also recognise the 'Climate Emergency' declared by the Council and clearly set out the expectations of the tourism sector to respond adequately to this initiative and associated targets.
2. While we agree with the change of direction outlined in this document, namely 'From driving growth to managing growth', there remains an implicit expectation that growth is inevitable. Given the well-publicised impact of tourism on the environment and the people living in tourist destinations perhaps the Strategy should go further to ensure the sustainability of the tourism sector. It is also noted that the Strategy states: 'Our guiding principle should always be to ask: "how can we improve the quality of life for residents and contribute to the city's broader economic goals?"' The question then is whether the content of the draft *Edinburgh Tourism Strategy 2030* lives up to this guiding principle and the headline change of direction. In our opinion, there are significant gaps that need to be addressed.
3. We believe that the Strategy does not go far enough in addressing the concerns of residents or clearly describe the expectations of the tourism industry. The report of the consultation conducted earlier this year shows that 74% of the mostly industry respondents agreed with the statement that the City should continue to actively target an increase in visitor numbers. Similarly 84% of respondents agreed that the new strategy should focus on generating growth in the quieter periods. Clearly both of these goals would result in increased challenges for the City but neither has been clearly stated (or quantified) in the draft *Edinburgh Tourism Strategy 2030* and therefore the resulting challenges and mitigations are also missing. **Are these still aspirations of the tourism industry or have these been dropped?**
4. With regard to the five main themes of the Strategy described as Priorities for Action or Goals our comments are as follows:
 - a. **PLACE** – we agree with the view that making Edinburgh a good place to live and work will help it be a good place to visit as well. Given this overall goal, it appears to be an oversight that in the underlying Ambitions there is not a definite statement about balancing tourism against the needs of residents (as well as other economic activity). We fully support the recommendation that the regulations being used to manage the short short-term letting

business should be enforced and upgraded to properly address the concerns of residents as outlined by PLACE, Edinburgh. Likewise, we fully support the need to better manage the use of buildings so that the overall needs of the City and not just those of visitors are met.

- b. **PEOPLE** – the first two Principal Recommendations in *Edinburgh Tourism Strategy 2030* relate to consultation with residents. However, there are no relevant indicators of success proposed to measure the extent to which these recommendations are being achieved. Without such measures, there is a danger that the statements from both ETAG and CEC regarding resident involvement in future tourism development are merely soothing words, when concrete actions are needed. Given the potential impact of Brexit on the future employment of staff from outside the UK, it would appear that greater emphasis should be placed on increasing the number of UK nationals employed in tourism, particularly those from Edinburgh. This would help address some of the issues around inequality and raising living standards mentioned in the *Edinburgh Tourism Strategy 2030*. Although the nationalities of visitors are being tracked there does not seem to be the same attention on the nationality of the people working in this sector. **Would it be worth setting a goal to increase the number of local residents employed in the sector and introducing targeted training schemes to bring more such people into the industry?**
- c. **ENVIRONMENT** - – It is not clear what is meant by ‘a hard deadline of 2037’ regarding the City’s goal of achieving zero net carbon emissions by 2030. **Does this imply that the tourism sector is not itself committed to this 2030 goal?** Overall, there is a lack of detail about the actions that the tourism sector will take to reduce the environmental impact of the current and expected future increase in the number of people visiting Edinburgh. For example, there is nothing stated with regard about reducing the number of tourism-related vehicle movements in the city centre; nothing about introduction of new electric vehicles and charging infrastructure to encourage their use by tourists or about upgrading of hotels’ heating and ventilation systems to reduce atmospheric emissions. Also, in the research conducted prior to the drafting of the Strategy, it was found that 91% of visitors identified ‘walking around the city’ as being one of the principal activities that they enjoy while in Edinburgh. It would seem appropriate to more effectively link the tourism strategy to the city’s ‘Active Travel’ goals.
- d. **PARTNERSHIPS** - We agree that there needs to be clearer governance with respect to the future management of tourism in Edinburgh. However, this governance should not be based solely on the needs of the tourism industry as expressed in this draft *Edinburgh Tourism Strategy 2030*. There is a danger of confusing the needs of the tourism industry with those of Edinburgh’s residents and those of City of Edinburgh Council. There is a risk that in seeking ‘partnership’ there is a blurring of the lines between these different groups. The Council is accountable to Edinburgh’s residents for the proper control of the activities of the tourism industry. In the terms of reference for the Strategic Implementation Group (SIG) formed to oversee the 2020 Strategy, it is stated that: ‘Decisions by the SIG are made for the benefit of the tourism sector in Edinburgh’. The SIG though is chaired by the Chief Executive of CEC and has a number of CEC councillors serving on it, including the Leader of CEC. It is difficult to understand, given the above statement, how the CEC councillors can also properly exercise their responsibilities to the residents that have elected them. One specific example of this potential conflict of interest is in the use of revenue that would be raised from a potential Tourism Visitor Levy. The industry, and thus the draft *Edinburgh Tourism Strategy 2030*, talks about using such revenue to enhance the visitor experience and to broaden the attractions available to visitors. The residents see this revenue as a means of mitigating the adverse impacts on them from the large increase in the number of visitors, for example, in improved street cleaning and public realm maintenance. Happier residents will contribute to a better destination for visitors and thus will benefit the tourism industry.
- e. **REPUTATION** – We agree that Edinburgh should have a good reputation as being somewhere that people want to live, work and visit. There is a mismatch between the

stated Ambitions and the Principal Recommendations (including the potential measures of success) in the draft *Edinburgh Tourism Strategy 2030*. The Principal Recommendations and Measures of Success make specific comments on the need to ensure alignment of residents' and tourists' perceptions, as well as the need to enhance the extent of satisfaction of residents with the tourism sector. However, nothing appears in the Ambitions or Ultimate Goal to suggest that such alignment is required. Given the overall statements in the introduction to the draft *Edinburgh Tourism Strategy 2030*, this appears to be a significant oversight.

Given the above comments on the Strategy and the lack of effective consultation:

- We would again extend the offer of direct discussion with those responsible for drafting the Strategy on some of the specific points outlined above.
- The period / extent of review should be re-examined to ensure more significant engagement between the Tourism Sector and the wider community in Edinburgh before the Strategy is finalised.
- The review should be broadened to assess the impact of this draft Strategy on the Council's other goals including those to reduce atmospheric emissions, reduce traffic congestion and improve the health and well-being of all people living, working and visiting Edinburgh.

Reviewed / agreed by the New Town & Broughton Community Council on 16th December 2019