

**Notes from a meeting of the Five City Centre Community Councils
to discuss Cllr Joanna Mowat's paper, entitled *A Charter for Edinburgh*,
held on Thursday 10th September at 7:30pm on Zoom**

Attendees:

Joan Carter	Southside CC
Jonathan Finn	NTBCC
Stephen Hajducki	NTBCC
Bob Hodgart	Southside CC
Patrick Keady	Old Town CC
Cllr Jo Mowat	Councillor, City Centre
Richard Price	NTBCC
Liz Summerfield	Tollcross CC
Isabel Thom	West End CC
Elsbeth Wills	Old Town CC
Gordon Wyllie	WECC (in the Chair)

BACKGROUND

Simon Holledge, Elspeth Wills and Patrick Keady invited the Five Community Council chairs to discuss Cllr Jo Mowat's paper - *A Charter for Edinburgh* (Appendix 1). *A letter from the Grassmarket Residents Association to the Cockburn Association* (Appendix 2), *Five Community Councils' Joint Statement on the City of Edinburgh Council's Policy and Sustainability Committee (Thursday 20th August 2020)*, *Agenda item 6.13: Update on Edinburgh's Christmas and Edinburgh's Hogmanay 2020/2021* (Appendix 3) and these additional sources were noted :

- Cllr Mowat's article in the Scotsman <https://www.scotsman.com/news/opinion/columnists/edinburgh-needs-new-city-charter-put-its-residents-heart-future-plans-joanna-mowat-2949884>
- Professor Eleni Theodoraki's article in the Scotsman <https://www.napier.ac.uk/about-us/news/fos-eleni-theodoraki>
- Morvern Cunningham article in The Skinny <https://www.theskinny.co.uk/art/features/building-edinburgh-back-better-in-a-post-pandemic-world>
- Julia Armour's article in the Scotsman <https://www.scotsman.com/news/opinion/columnists/edinburgh-festivals-balancing-act-crucial-recovery-julia-amour-2954658>

WELCOME

Gordon Wyllie accepted an invitation to chair the meeting. Returning thanks, said he believed everyone present would heartily support the conclusions of *A Charter for Edinburgh*, noting that the paper focuses primarily on the impact of all aspects of tourism on our city, and balancing that with the wishes of resident communities. Gordon asked Cllr Mowat to speak to *A Charter for Edinburgh*.

In reply, Cllr Mowat began by saying it had been put together in response to constituents' comments and growing concerns over many years. In addition to regret at the loss of this year's festivals, it is a general concern among city-centre residents that the constant increase in festival activities and events is not sustainable.

"What are residents' priorities?" she asked.

"Is it generally agreed that the Festivals are a good thing?"

The overwhelming answer was YES, although concern was expressed about the concentration and location and domination by a few big companies. It was noted that the generality of the points raised in Cllr Mowat's paper could equally apply in other spheres, including planning and licensing.

Congratulating Cllr Mowat on her excellent paper, Joan Carter felt all the ideas were magnificent, but asked how could even the current licensing etc conditions be enforced?

THE NEED FOR A CONSULTABLE REGISTER OF EVENTS & CONDITIONS

Jonathan Finn wondered if there was already a requirement for some sort of Operating Plan for festival venues, that details how the venues will be run (e.g. refuse collection, transport availability, mobility, noise, operating hours etc.) and what effects these activities will have on residents and the local community.

In response, Cllr Mowat believed that each venue will have some element of this, and that the Council might be able to devise better and smarter means of enforcement, including some way of drawing things together, perhaps on a "single form" available digital log available online, for all to see.

Jonathan Finn felt this would be ideal provided it allowed on-line public access that was available for all to see. Joan Carter agreed and felt it would be important to make the reporting of breaches easier.

Robert Hodgart said that Southside CC was in strong support of Cllr Mowat's paper, and more attention should be paid to the value of the city centre as a World Heritage Site and place where people still very much want to live. More account needs to be taken of this feature of the city centre.

Elsbeth Wills felt that operators need to be more accountable, and the terms of their licenses prominently displayed. She felt that this accountability should be expanded to include the Tattoo, which she believes treats the Grassmarket residents as if they are not do not matter and as if they do not exist.

Cllr Mowat said that one of her first tasks will be to facilitate a meeting with the Edinburgh Tattoo management. She will ask the Tattoo to meet with the Grassmarket Residents Association.

PRESSURES ON PLACE & SPACE

Cllr Mowat had already met Julia Armour (Edinburgh Festivals) on Wednesday 9th September. One issue to be explored is establishing an overall capacity (numbers of people, venues) for various parts of the city to host events at any particular time; it is expected that the Festivals in 2021 will be smaller than in 2019, but unless carefully monitored and managed they will grow back in time, to the levels complained about so much in 2019.

Cllr Mowat felt the Council should be an enabler about how spaces should be used and that the regulations are in place for using those spaces. Provided it is legal, it would be wrong for the Council to be an arbiter for what goes on.

Elsbeth Willis referred to the closure of Victoria Street as part of Summertime Streets in 2019, and the arrival of enormous crowds gathering around performers, in an area which the local authority had identified as a public space.

Jonathan Finn highlighted the need to balance what residents give up and what the City gets back in return for what they have to do without during the period of the festivals. He asked for a greater balance between the public space and venue spaces. In his view, all affected streets should appear on the log + details of permitted events.

It was noted that a lot of potential complaints from residents and others, do not get captured – this is because the reporting process is not well-known, or too difficult to follow.

HOW TO CREATE A DIGITAL LOG WITHIN THE NEXT FEW MONTHS?

Stephen Hajducki felt this could be established along the lines of licensing, limiting numbers, treating each multi-venue as a series of separate ones, no pop-up cafes/food outlets competing with local micro-businesses, the enforcement of employment law and arrangements for short-term lets. The operator should be required to address all these points. It could also be used to promote an increased quotient of intellectually interesting and valuable events. Some festivals could be rescheduled to other parts of the year, or areas within the City or even Scotland. Every aspect could be addressed via a well-designed application form.

Liz Summerfield highlighted that the International Festival is a showcase for the best the international art world has to offer tickets are relatively expensive and do not appeal to a majority audience. The Fringe used to be an opportunity for budding artists to showcase their work at minimum cost and their success depended on the quality of their product. The ethos of the International Festival has not changed much, but the *raison d'être* of the companies controlling the Fringe has – in other words, making money takes priority over showcasing art.

ISSUES OF ACCESS AND QUALITY

Robert Hodgart wondered how the overall quality of Fringe events could be enhanced. It was difficult to regulate. In a wider context than the Fringe, Gordon Wyllie felt one way by price might be for the Council (a) to follow the Arts Council subsidising what seemed to be better types of events and (b) to allow discounts to local people. Even if events need to become (more) expensive, there needs to be open access for local people. With regard to non-Official events, it was agreed that an appropriate place to begin the debate could be the Fringe Society. Robert Hodgart also spoke in favour of targeted subsidies and sparked off a general discussion regarding how one might best foster an interest in the arts among the younger members of society.

While Cllr Mowat felt that it was difficult for the City Council to be an arbiter of taste and quality, everyone agreed that the aim should be to protect Edinburgh's quality "brand", and encourage more visits by the culturally discerning, while accepting that this might not be a universal view among Councillors and (perhaps especially) officials. ("Don't put lipstick on a pig" attributed to a former design champion, was said to summarise such an attitude.) Stephen Hadjucki reminded the meeting that the origin of the Festival was the promotion of cultural renewal and not commercial gain, and this too received strong support.

A tension was noted between those who value the World Heritage Site, the culture it represents and those who want Edinburgh to develop in a 'modern' idiom.

INTENSITY OF USE

Cllr Mowat felt the forthcoming Public Spaces Manifesto might be the best place to address aspects of this and did not think that the city centre would necessarily continue to be the

retail centre in the future. One point to discuss with the festivals people including the Fringe is the question - Should the Festival events be lumped together or spread out?

Cllr Mowat will speak to the official concerned with drafting the manifesto, and with the endorsement of the Five City Centre Community Councils will share her paper with Donald Wilson as Convener of Culture & Communities.

Support for her paper was strongly and universally agreed.

BUSINESS COMPETITION

Jonathan Finn referred to the unfairness of locally - based businesses who pay for year-round local services needing to compete with those who do not share the same burden. But it could be difficult to find other than anecdotal evidence. How to find factual and statistical evidence?

In addition, Elspeth Wills said that the Council needed to be better at discerning between low-paid temporary jobs and economic benefit. Their analysis regarding the need for more hotels needs to be much more robust.

Food and beverage businesses that had been trading for about 30 years, reported to Cllr Mowat in September 2019 their turnover was significantly down. They believed this was because of all the "pop-ups" introduced at George Square and a few other locations around the City. It was accepted those businesses need to be nurtured and treasured for their amenity.

ACHIEVING A BALANCE

Joan Carter reverted to the question of capacity - how much of each element (food and drink) might be appropriate or necessary as opposed to various elements of the festivals such as shows. Also, to what extent might it be possible to relocate elements of the festivals around the city?

Cllr Mowat felt this would be quite difficult in the short term, because the 2021 festivals will be much smaller. Longer term, one might be looking at a much more "blended" work/life balance.

Cllr Mowat felt it might be possible to create a blueprint. Culture and Creativity could be used to underpin new areas of housing etc. It was important to get the blueprint right - but this is more in the longer term than next year.

It was acknowledged that much more needs to be done to co-ordinate the flow of crowds generated by the big festivals and events at Easter Road, Murrayfield and Tynecastle. The City Council seems best placed to ensure this happens.

NOISE

Robert Hodgart referred to the potential for banning electrically amplified music, and everyone strongly confirmed that this is an essential priority.

In response to a question about pop-concerts and fireworks identified as probably the one thing that does not fit with the cultural mix of the festival - but exploited by Historic Environment Scotland – and West Princes Street Gardens in closed to the public for three months in 2019 - Cllr Mowat proposed a blanket condition of no amplified music, there would be an agreement as to the number of events in the space, how the decibel levels would be

monitored, this would be overseen through the licensing system and where the peak decibel limit is exceeded, the sound would cut out – just like in Hyde Park.

The noise occasioned by fireworks is also an issue and limits and reduction was strongly agreed. Fireworks shows (and the associated increased air pollution) are cheapened by over-use. The meeting endorsed the promotion of silent fireworks, where 'loud' fireworks would be kept for up to 2 special occasions a year and/or not after ten-thirty at night.

CO-ORDINATION

It was felt that the City Council and Festivals Edinburgh might offer a way for the organisers of to coordinate many separate events

Elsbeth Wills wondered when the Council might publish its long-awaited protocol on the use of public spaces, and Cllr Mowat felt that the current situation might form part of the catalyst for this.

There being no further business the meeting concluded by expressing renewed thanks to Cllr Mowat for her excellent paper. and endorsing its proposals.

CONCLUSIONS AND SUMMARY

1. Edinburgh has a quality "brand" which needs more protection.
2. More discernment is needed regarding the events allowed to take place, even if this makes them more expensive.
3. Whether or not events become more expensive, open access for locals and young people ought to be facilitated for quality events
4. Discerning tourists are good for the City – they do not like over-development more than local people do.
5. Over-use of public space is rampant and needs to be reigned in.
6. A comprehensive and publicly-consultable detailed digital database is within the City Council's capacity to deliver and should be implemented
7. Cllr Mowat's paper *A Charter for Edinburgh* is warmly and comprehensively endorsed.

Appendix 1

A Charter for Edinburgh

The genesis for, what I rather grandly called, A Charter for Edinburgh was about how we could fix some of the problems that existed before we went into lockdown so rather than the year being lost we used the time without the Festivals and Events to consider what good Festivals and events and activity in the public sphere looks like.

Having received such a good response to the initial article I realised this could not just be yesterday's chip wrapper but would have to worked up into something more tangible. Since my piece appeared it has been followed by a piece from Julia Armour from the Festivals and Juliana Delaney whose company runs Mary King's Close and they appear to be in the same mental space as me which is encouraging and I think this may be the time to grasp the nettle and try to effect change.

The increasing use of public space for events has seen tensions grow between those who live adjacent to, or overlook the space in the case of hard standing. With green spaces people who use the space regularly feel dispossessed when events are put on – especially when there is little warning or information about when and how the space will be used. The themes thrumming through 2019's festival was about the commercialisation of public space, dispossession and that those who live here all year round as residents or trade as businesses felt that the city had been given over to an alien event and they were roused to anger.

The Festivals started as Edinburgh's response to the dark days after the second world war – they were to be a welcoming light after these dark years and a balm to heal broken souls. Great art heals and unites because it is a common language. They were welcoming and unifying. They are also a magnificent achievement and something of which the City should be enormously proud. Any discussion of how public space and events happen in the City has to include the Festivals as part of the solution – there is no solution to the disgruntlement experienced last year without the Festivals. There is an additional pressure on the Festivals by additional events that would like to use Edinburgh's beauty as a backdrop for their events which has added to pressures experienced by residents throughout the year and heightens negative impacts of the Festivals on the residents as the noise, mess and chaos associated with events is no longer associated with a discrete part of the year but can occur at any time.

The necessity of addressing activity on the street has been a discussed since the "regeneration" of the Grassmarket. The works to transform the area caused significant disruption but it was apparent that the impact once the works had been completed would need careful management. When that was in place and those managing the space worked with the residents there was an equilibrium. Losing that management resource has meant constant frustration for the residents, and council officers who are faced with complaints and frustration that cannot easily be ameliorated under current management arrangements. As events and Festivals have grown ever larger, Council officers have had to respond to these demands and time to create a framework for holding events has not been found. The cancellation of the Festivals this year allows us not only to see the City without the visitors but gives us breathing space to craft that framework and work out what we want our city to be and how we can re-find the welcoming, healing and unity of the first Festivals.

What we need:

To agree our common values and what the city can accommodate regarding events and what regulation activity on the street should be subject to.

Residents and visitors alike value the beauty of the City – part of hee unique nature is that the centre remains very much a living city centre and, I would argue, that heritage is as

much part of our World Heritage award as the fishbone plan of the Old Town and the formal plan of the New Town.

The city needs to make a choice about how to respond to the pandemic. City centres will be affected by the changes in working practices – there is a choice whether to throw open the city centre as a modern day Xanadu or as a place where people live, and live well, but also shares its beauty and experiences with the world. If the latter path is chosen it will require limitations on capacity. In theory the Tourist industry (represented by ETAG) and the Festivals are committed to spreading tourism and visitors across the city – setting a capacity on the city centre and saying no once this has been reached would assist with this aim. Restricting the amount of events would increase their rarity value and should assist with increasing charges and fees and hence contribute towards costs of the necessary management.

How:

There needs to be a set of management principles or rules which must be clear and enforceable. It would seem necessary to have city wide rules for all pavements and hard standing to ensure that they are passable and that anything on them has specific permission to be there.

There should be a publicly available record of this that anyone can consult.

Specific spaces for the holding of events would then be identified with their own management rules which should be agreed via consultation.

Alongside a clear set of rules for each area should also sit an events log so where there are agreed numbers of events anyone can consult the log to see what has been held and when. This should be populated as fully as possible and as soon as an event is known.

Current situation:

The public spaces manifesto which does some of this work is due to come to Councillors on the Culture and Communities Committee for agreement. This is currently in development and we should seek an opportunity to involve community councils in the pre-consultation stage. At the recent All Party Oversight Group on this I suggested that the Festivals be brought into this to look at the broader issues and to try and achieve agreement with key groups: residents; festivals; tourism businesses who operate in these spaces and probably have most to lose as a reduction in the quantity of visitors will impact them.

Activity	Current Control	Possible Control
Amplified music	Noise pamphlet/posters in some places	Blanket ban on amplified music by council policy/by-law
Advertising on street	Banned by council policy – needs better enforcement	
Walking tours	Unregulated	Work with industry to agree code of practice
Tables and chairs	Controlled via permit	
Markets/trading	Controlled via license	
Closing off streets for events	Controlled by roads/public safety/environmental health	Experience for users and complainers could be improved to make it easier to apply/notify/object/approve
Structure up for more than 28 days/some advertising	Controlled via planning permission	

Areas for improvement:

Residents feel they have no control over what goes on the street and how it impacts them – agree a framework for maximum use of particular areas and what type of activities are suitable; create a publicly accessible digital log so people can plan in advance and know what events are upcoming; create a sign up service for each area so people are notified of what events are proposed; where amplified music is allowed ensure monitoring of noise levels is part of a permission – set these in conjunction with residents and monitor them (surely this can be done remotely) and cut the noise if levels are breached.

What is above are examples – there will be issues I have missed out; there will also be some which people don't agree should be regulated but for this (and I can see that may cause some debate) to be agreed we will need people to come to the table willing to make this work, willing to listen, willing to compromise and wanting the best for the future of the city. We also need to get people round the table and if you want to be there I will endeavour to find a virtual table and a way to take this forward.

I have been encouraged by what I have read and I am convinced that we need a clear statement of what we expect from the Council, from the Festivals, from events organisers about how our space is used and then a way of holding the parties to account so the residents can do what they do best and provide a warm welcome.

Appendix 2

Letter from the Grassmarket Residents Association to the Cockburn Association

GRASS (the Grassmarket Residents' Association) is writing to give you our input into the above request for feedback.

Morvern Cunningham's rallying call *Build Back Better*, some but not all of which we as residents would support, brings it home to us the sheer number of interests, from hotel operators to arts creatives, who are involved in the Festivals. This makes it a difficult juggling act to plan ahead but those who live in the city centre should be central to any future plans. One message seems to be increasingly a unifying theme – we simply cannot go on in the 2019 model. One headline ought to be seen as a negative in future: 'Fringe has record year in terms of the number of shows and audiences'. There must be an end to target driven measures of success both inside the Council and the Festivals.

We have limited our comments on a number of grounds:

- 1) We have excluded the smaller festivals such as the Science Festival and the Film Festival which have little impact locally.
- 2) We have confined our comments as to how the summer Festivals impact on our locality as residents. As individuals, members of the community include both avid Festival goers and those who are not interested in or can afford to attend any events.
- 3) We have not included wider arguments surrounding over-tourism in the Old Town and the commercialisation of public space in general, as our views and the views of the Old Town community are well known already.

Specifically in relation to the summer festivals we as Old Town residents should like to make the following points.

- 1) No Festival organiser in the half century that I have lived here has made any attempt to consult the community at planning stage. GRASS initiated a conversation with the Director of the Tattoo some years ago but, although we found him friendly, he was totally unwilling to change any element of the Tattoo programme. He also saw no need or to deal with issues like the late running of the late night Saturday night show which means that many residents cannot retire for the night until after 12.30 an.
- 2) Over the years more and more experiences are added to summer entertainment programmes, like the RAF flypast during the Tattoo and the pop concerts on the Castle Esplanade in July but nothing is ever taken away. In terms of disruption, the Summer Festivals increasingly merge with the Christmas markets which, wider issues relating to East and West Princes Street Gardens aside, results in the gate in King's Stables Road being increasingly locked. This is an inconvenience to residents of the west end of the Old Town who use the route through the Gardens to access Princes Street.
- 3) The traffic arrangements in 2019 were shambolic with the rerouting of vital bus services and random street closures. What with the build-up of traffic, the creation of cycle priority zones and street closures, the muddle is continuing in 2020 with the sometimes conflicting aspirations of Spaces for People and the Transformation project leaving residents unclear as to what are temporary and permanent changes. There are particular problems for residents who need car access because of work or disability. The Council does not appear to accept that the needs of walkers can be very different from that of cyclists. There are also practical considerations such as that getting to the Mound from the Grassmarket adds £2 to a taxi fare because of road closures. Delivery companies have blacklisted certain streets because of the difficulties of access.

4) When the Festival was launched in 1947, Edinburgh was not a tourist city whereas now the Summer Festivals clash with the height of the tourist season. This adds considerably to the stresses experienced throughout the Old Town.

5) Similarly the creative industries were almost unheard of as an economic sector when the Festival was first launched, whereas between 2011 and 2018 they have grown by over 30% in terms of employment alone. Many performers look to the Festival and in particular the Fringe to showcase their talent in the hope of being 'discovered'. While we do not wish to see the Fringe lose its original ethos of anyone being welcome to perform, some measure of controlling numbers is urgently required rather than opening up residential public spaces to all-comers. When Victoria Street was closed to traffic last year, within days it simply became a new space for Fringe performers, especially those who were unofficial street artistes. When asked politely by nearby residents to move on, buskers can be offensively rude and intimidating. Despite efforts by residents, the police and the Council to ban busking using amplified music, this remains a problem especially in August. A radical solution would be to ban all amplified music in the Old Town from the Tattoo to individual pubs. It would make life a great deal less stressful for both residents and workers.

6) We do not consider that pop concerts, which cause disruption not only to residents but also other Festival performances, should be part of any Festival offering. They attract a different audience which could easily be housed outside the city centre. The increase in the frequency of Silent Discos both during the day and in the evenings is marked in August and bears little relationship to a Festival experience. They are far from silent and a danger both to pedestrians and motorists as well as adding an additional disturbance to residents. The need for Festival venues other than theatres and concert halls to be crammed into the city centre has to be questioned at a time when demand is sufficiently high for events and any attendant economic benefits to localities to be spread more widely across the city. Controlling the use of venues may also be a way of reducing the impact of the Fringe on the city centre.

7) We object to the growing use of fireworks on both their disruption to residents and their pet animals and on environmental grounds.

8) Walking around and looking at the living city is the activity that tourists enjoy most. Meeting local people is part of that experience. Unless urgent action is taken, visitors to the Grassmarket area including Festival goers will no longer be able to enjoy that experience, as the last residents will have left and the few remaining non tourist businesses will have closed.

9) In an era where personal wellbeing is increasingly recognised as being closely related to mental health, the Festivals add an additional level of stress to local residents trying to go about their everyday lives. While there is much to celebrate about the Festivals, not all residents may be in the mood for relentless Fun fun fun. It is simply that they have become too big, too commercial and too long in duration. Our conclusion is that the Festivals are no longer sustainable in their present form.

We give the last word to our local Councillor, Joanna Mowat who points out that 'If something is right for residents, then tourists will come.' We endorse her call for a charter for Edinburgh which has to include Festivals and major events 'Preserving a living city centre must stand at the core of any future plans.'

I attach a copy of GRASS's response to the latest consultation on the Edinburgh city plan 2030 as background context.

GRASS looks forward to the findings of the Cockburn Association on the complex issue of the future direction of the Edinburgh Festivals. It would be fair to say that local people have enjoyed the break from them this year although given our experience of the Grassmarket coming out of lockdown and there being no sign as yet to a definite end to the pandemic, there is little prospect of residents and visitors being able to socially distance given the

crowds that flock to the Grassmarket each August.

We should like to thank you for the opportunity to comment on this important issue and should welcome the chance to comment on other initiatives that affect living in the city centre. We should like to thank you for taking a robust stance on several issues to date such as public and green space.

Elsbeth Wills, Chair GRASS, 29/08/20

Appendix 3

Joint Statement on the City of Edinburgh Council's Policy and Sustainability Committee (Thursday 20th August 2020), Agenda item 6.13: *Update on Edinburgh's Christmas and Edinburgh's Hogmanay 2020/2021.*

As agreed by the New Town & Broughton Community Council, Old Town Community Council, Southside Community Council, Tollcross Community Council, West End Community Council and The Cockburn Association.

The Five City-Centre Community Councils and the Cockburn Association welcome the opportunity to comment on this important issue.

Overall, we support the direction of travel away from the arrangements that caused so much damage to East Princes Street Gardens and distress to residents in 2019/20. We remain of the view that the gardens are not appropriate for the Ferris Wheel, Star Flyer and market stalls, next to the Scott Monument.

We recognise that the serious impact of the Covid-19 pandemic in terms of public health and economic uncertainty mean that the Council needs to be extra cautious and fully transparent in considering how the city chooses to celebrate Christmas and Hogmanay this winter safely. Recent experience from Scotland and elsewhere strongly associates the transmission of Covid-19 with food and drink establishments and it is not clear from the report, how this will be managed especially given that this has been a major element of past offerings by the Christmas market.

We offer a short analysis and some propositions for consideration by the Committee.

Analysis and Comment

Failure must be designed out of all plans for the Christmas Market and Hogmanay. Therefore, an **effective risk management process** must be hard wired into all stages.

The absence of an assessment of the risks in agenda item 6.13 suggests the present risk assessment may not be sufficiently robust. We suggest that, at the very least, there needs to be an explicit and public statement of key risks, how they will be managed and by whom.

We note the paper is silent on multi-agency plans that would be in place, to enhance public health and minimize financial uncertainty to the city. We strongly recommend that the committee robustly assures itself with respect to the appropriateness of plans for business continuity, disaster planning and inter-agency risk management with respect to Covid-19, terrorism, security, design, layout, location, authenticity and more. To this end, we encourage councillors to refresh their understanding of the Local Government Association's guidance, "*Festive cheer, the local impact of Christmas Markets*" (pages 12 to 16) and associated guidance.

<https://www.local.gov.uk/sites/default/files/documents/10.13%20Christmas%20Markets.pdf>

At this point we would identify three risks, though doubtless there are others:

- A local lockdown being imposed as a result of a spike in cases in Edinburgh;
- Lack of an effective test and trace system, combined with identification of an outlet market area showing up as the locus of a number of cases;
- Quarantine restrictions on international vendors, performers and visitors.

An **enhanced** (and not just "adequate") **security and people management** for all aspects of the Winter Festivals is an absolute priority with respect to public protection (para 4.8). It is our view that the Christmas Market, Hogmanay and associated events should be outwith

East Princes Street Gardens. Although there is restricted access to EPSG (para 4.14), other dispersed elements of the Winter Festivals should have the same level of management to prevent overcrowding, protect health and ensure social distancing. Even with pre-booked tickets and virtual queuing software, it is inevitable that physical arrangements will need to be put in place. This should be built into any approval process. The paper is silent about people who are unable to download queuing software. We are concerned this would result in some individuals and groups being excluded from the Christmas Markets and Hogmanay altogether. This needs to be addressed especially given the emphasis placed on the residents in the proposals.

No loss of public circulation space should result from measures put in place for these events. For the avoidance of doubt, such management and social distancing measures must not be a Trojan horse for increased commodification of public spaces including streets.

We welcome the restricted use of East Princes Street Gardens, noting the Old Town Community Council's *Lest We Forget* and the Cockburn Association's *Keep off the Grass* campaigns. We welcome the indication that there will be a full Environmental Impact Assessment for the Big Wheel and Star Flyer although we retain our reservations noted above as to the location of these attractions. The report, however, stops short of explaining how the planned events will contribute to **Edinburgh's carbon reduction targets**. It makes no reference to ISO 20121 on sustainable events.

It is vital that absolute priority is given to **supporting existing local businesses** and micro-businesses including local social enterprises (Edinburgh Social Enterprise is the most appropriate source of assistance) through all aspects of the events. The aim to create an Edinburgh Christmas Makers' Market is welcome but silent on important details. This needs to be addressed.

Since public protection will be best served by scaling down the market, at which 67% of outlets in 2019 were non-local, it seems clear that reductions are needed for 2020 in the number, as well as the proportion, of non-local exhibitors. In particular, there should be **no pop-up bars** and food outlets, especially as these create direct competition, not additionality, to local all-year round businesses such as bars and cafes. We also feel that that pop-up bars would be particular problematic to the effectiveness of any test and trace system.

Locating market stalls on streets will clearly have an impact on local residents for more than two months. We therefore ask that **residents on all affected streets are consulted** for a period of at least two weeks, before a decision is taken about where the market stalls will be located on the City Trail.

In furtherance of the points raised above, we note that the proposed dispersal of operations across the city centre does not equate to a scaled-down version of the Winter Festivals. It is unclear if the intention is to maintain the volume of stalls and leases to ensure financial viability. This vagueness permeates the entire paper.

It is our view that the Christmas Market, Hogmanay and associated events should be outwith East Princes Street Gardens. To that end, we welcome the commitment in paragraph 4.18. If the Council decides to allow some activity in East Princes Street Gardens, the integrity of the planning system in the city must be reinforced after the debacle of the last two Christmas markets, which seriously damaged the trust of many residents in both the Council and Underbelly. All necessary planning applications must be submitted, with sufficient time to allow for consultations with statutory bodies and the general public. We recognise that consent would be required for the large rides in East Princes Street Gardens but believe that the whole of the market, along the top path of the Gardens and the Mound Precinct, requires planning consent, and so should be included in the scope for the Environment Impact Assessment, noted in paragraph 4.11. We are concerned that the report is silent on the

possible need for planning consents for dispersed activities. For example, the ice rink on George Street (as suggested) might require consent, if it were fixed in place for 28 days or more. The same applies for the family fun fair and its associated rides.

The **Christmas City Centre Trail** (paragraph 4.9) implies various locations for markets which could bring additional benefits to those areas. Again, the vagueness of the paper makes it impossible to tell if the intention is also to include existing markets, such as those in Stockbridge, Castle Terrace Car Park and the Grassmarket, as part of this trail.

Finally, we ask for the Policy & Sustainability Committee to make a firm commitment to an early and comprehensive public review of the Winter Festivals. Indeed, given public statements made recently by VisitScotland and the various Directors of the Festivals on the need to scale back the various events, for which they have responsibility, a wider public review would be welcome.

Recommendations

We propose that the following amendments be considered by the Committee:

1. The Council affirms that in planning and delivering these events, absolute priority will be given to public health and safety. This will require a thorough and open risk analysis, covering inter alia ensuring sufficient security at all venues, as well as means by which the Council and other agencies will monitor the levels and effectiveness of such measures.
2. A more ambitious target of 60% is set for the representation of local businesses, micro-businesses and social enterprises in the market, which will also be downsized from the scale of 2019.
3. Outlets and stalls in the dispersed market should complement rather than compete with nearby local businesses, most notably in the food and drink sector.
4. Approval of the *Update on Edinburgh's Christmas and Edinburgh's Hogmanay 2020/2021* report should not have any influence on the Council's consideration of any planning or licensing applications.
5. Underbelly as contractors will be required to comply with ISO20121 and demonstrate that the events are consistent with Edinburgh's carbon reduction targets.

Carol Nimmo, Chair, New Town & Broughton Community Council

Samuel Piacentini, Chair, Old Town Community Council

Tim Pogson, Chair, Southside Community Council

Laura Hehir, Chair, Tollcross Community Council

Gordon Wyllie WS, Chair, West End Community Council

Professor Cliff Hague OBE, Chair, The Cockburn Association

Edinburgh, 19th August 2020.