



OLD TOWN
COMMUNITY COUNCIL



TOLLCROSS
COMMUNITY
COUNCIL

West
End
COMMUNITY
COUNCIL



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.

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Edinburgh, 19th August 2020.