



World Heritage Management Plan 2024-2034 and Action Plan 2024-2026

Cockburn Association comments
15 April 2024

The Cockburn Association has considered the new draft Management Plan for the Old and New Towns of Edinburgh and offer the following comments.

Scope

The draft Management Plan now covers a period of 10 years versus the previous plan's 5-year lifespan. We assume that this is to align with City Plan 2030 although there is no specific explanation for this change. It would be helpful if this were explained. A ten-year plan period could mean that there is little scope to respond to changes in policy or circumstance. However, the introduction of a two-year Action Plans is a pragmatic response to allow these concerns to be managed.

The draft Plan appears to be a roll-over of the existing plan. Given the issues and challenges that we set out below, we question if this is entirely the right approach.

We note that both the draft Plan and Action Plan highlight the requirement for a State of Conservation report to be prepared with the last Periodic Report completed in 2013 and the most recent Periodic Report prepared in 2023 and awaiting publication. We consider it would have been better to have delayed this consultation exercise until this was published and made part of the consultation package. It is also unfortunate that information contained in the Key Figures table in section 3.3 is incomplete. However, we recognise that the document is in draft form and this will be rectified.

It is clear that the Plan has limited influence in certain functional areas of the Partner bodies that are key to successful delivery. The Action Plan highlights in broad terms that there are areas of overlap with other areas of work and strategies from the Partner bodies; it would be preferable to have more specific work identified in these sections to ensure that monitoring is targeted.

Aims and Objectives

The Association agrees with and supports the aims of the draft Plan as set out in para. 2.2. We also support the five themes set out in the Action Plan, being awareness and appreciation; climate emergency; conservation and maintenance; control & guidance; and a sustainable visitor experience.

We also support the proposed Scrutiny Group in principle but feel that its membership ought to be reviewed. We believe that the views of resident's need their own direct link to organisational management. It would also be useful to set out clearly how wider engagement in sustainable tourism and heritage management can be facilitated, bearing in mind that existing forums or groups may already be in place for this to happen.

Commentary and issues of concern

The Association notes that both NPF4 and City Plan 2030 contain policies that are relevant to the WHS. However, many issues impacting on the WHS lie outwith the planning system. The Action Plan does not rise to the challenge of addressing these in a targeted way. The public consultation exercise quoted in the main plan highlights decline in the quality of the heritage (real and perceived) for which the WHS was originally inscribed. Indeed there are few concrete actions in the Action Plan and many ongoing discussions. It is not clear how, where and if funding has been secured for many of the proposed actions.

In accepting the structure of a 10-year main Plan with a 2-year Action Plan, we would expect the latter to have SMART targets embedded in it. We would expect a final version of the Plan and Action Plan to have Key Performance Indicators and specific areas of action with expected outcomes and outputs.

The Management Plan must drive a data-driven approach to policy formulation and action-setting. This is currently missing in the draft Plans. We appreciate that a State of Conservation Report has been prepared, but its data must be used to inform the plan, influence its approach, and drive activities (with measurable targets).

Specific Concerns – Action Plan

There are six critical areas for the ongoing management of the WHS which we would expect the Action Plan to address.

The first is climate change and climate impacts. The potential impacts on the built heritage of the WHS have already been highlighted in the comparatively recent impact study “Climate Vulnerability Index Assessment the Old and New Towns of Edinburgh World Heritage Property.” However, the key learning points from this study do not appear to have been embedded in the proposed Action Plan. The proposed actions in the draft Plan commit Management Partners to “advise, develop, seek to fund, and advocate for appropriate responses.....” We question whether this is adequate. We do accept that there are actions which are appropriate and meet SMART criteria, such as “ensuring the maintenance of drainage systems and green spaces across the WHS.” This can be measured, and delivery assessed.

The second issue is the general disrepair of traditional buildings across the WHS. In a study commissioned by Edinburgh World Heritage with SPADiS, 72% of WHS traditional buildings were found to require a critical repair. Whilst we understand that this may not have been a robust study (student-led), this is significant enough to drive investigation to produce accurate data on the scale of the actual problem. This is missing. For example, the general failure of rainwater goods across the WHS on a typical rainy day let alone a storm event, is a clear case in point. Good maintenance is a basic requirement of the management of heritage buildings. The Action Plan ought to include provisions to drive targeted investment in maintenance across the WHS.

Thirdly, the declining quality of the streetscape and public realm across the WHS is a very real issue. However, this are not highlighted as a priority for action in the Action Plan and gets no specific mention. It may be this is one area hinted at with reference to ongoing City strategies but, if this is the case, it ought to be made more specific in the Plan. The approach to interventions in the public realm frequently takes place without an acknowledgement of the site and its OUV. We acknowledge the challenges in achieving the pro-active management of the built fabric of the WHS but the patchy application of key heritage principles by the City of Edinburgh Council in administration of its role across the management of the WHS is a disappointment. While the Action Plan seeks to address this in broad terms a final version of the Plan ought to set out how this will be achieved in a manner that

can be measured and assessed. There is undoubtedly a role for the Chief Planning Officer in ensuring the quality of what happens in the WHS is seen as a corporate priority, not just one for planning services.

The fourth issue that is missing from the Action Plan is the negative impact of the volume of tourists in the city. There are no actions aimed at identifying and addressing dis-benefits, both physical and social, arising from 'Overtourism.' The World Tourism Organization (UNWTO) defines overtourism as 'the impact of tourism on a destination, or parts thereof, that excessively influences perceived quality of life of citizens and/or quality of visitor experiences in a negative way.' The Edinburgh Tourism Strategy makes much of the need to work with the World Heritage Site. The chronic undermanagement of the city's tourism and events-led sector and its impact on streetscape, housing, and retail offer (which has some benefits too) need to appear in this Action Plan. We would also advocate a push towards "responsible tourism" rather than "sustainable tourism", as the former has a basis for better understanding and it would align better with HES's recent strategy on it.

The fifth issue is data, a point we have raised several times in this consultation response. Both the Management Plan and the Action Plan should be driven by relevant and reliable data. Good management information is a pre-requisite to good action planning and the design of appropriate actions/activities. The State of Conservation Report is a key absence in this regard, which should form part of this consultation with a clear map in how it will influence on policy and policy direction. As it stands, it is not open for public assessment.

The sixth issue is collective engagement. The proposed Scrutiny Group is constructive but does not capture the scale and diversity of all the players in the WHS's management. Opportunities need to be given to key heritage stakeholders, residents' groups, and local businesses to support delivery of the aims and objectives of the Plan.

SUMMARY

The Cockburn Association welcomes the development of a new Management Plan and Action Plan for Edinburgh's World Heritage Site.

However, we consider there is significant work to do to ensure that they become effective management tools. This is especially the case for the two-year Action Plan, which requires management targets and KPIs. These should form a critical part of the assessment for the next two-year Action Plan. Without these it will be impossible to objectively monitor and assess the success, or failure, of the individual actions being progressed and the Plan as a whole.