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SPF Response to Edinburgh Heritage Plan

4. What do you think about our plans to ensure a broad level of understanding of the World Heritage Site and to widely transmit its value?

We welcome the management and action plan. It is essential to raise awareness of the need to understand and maintain the World Heritage Site in Edinburgh. Edinburgh's distinct architecture attracts tourism from around the world and it is essential to conserve that characteristic. We believe that engagement with key developers, investors, stakeholders and the wider community is important to transmit the value of heritage site and help maintain it.

5. What do you think about what we are doing to engage with work in response to the climate emergency whilst safeguarding the city's Outstanding Universal Value?

As mentioned above, we welcome the approach in the management plan to the conservation of the built environment heritage in the old and new towns in Edinburgh. It is important to be pragmatic in the approach to conservation, and at times there has been arguably an excessive approach to the denotation of conservation areas. But overall, we believe the plan is sound. We believe that there should be a more bespoke conservation, adaptation, mitigation, and restoration plan given that climate change is here and impacting the built environment.

We appreciate that the action plan mentions engaging with strategies such as City Centre Transformation, City Mobility Plan, Active Travel Plan and the Future Streets Framework. In order to promote preservation and maintenance of heritage, we believe it should be mainstreamed into the LDP (City Plan 2040) and other planning policies as well.

There should be more guidance on decarbonising the listed buildings, heritage buildings and areas that fall into conservation zone by using various suitable methods such as connection to Heat Networks or fabric upgrades mitigating the impact on facade or wider heritage characteristics of the building.

6. What do you think about how we plan to ensure ongoing investment in the conservation of the World Heritage Site?

We welcome that the Action Plan seeks to collaborate with a number of stakeholders and public bodies but concerned there will still be funding gaps and resourcing challenges that could impede the maintenance of some publicly owned heritage buildings. There is also little recognition of the important role that the council and private sector have previously played in securing wider investment for the city centre. We must be mindful that if restrictions are too onerous on the private sector that this may deter further investment into the city thus undermining the important role of the private sector in contributing to conservation initiatives. The legislation must be flexible in order to unlock private sector finance which can then be allocated to conservation efforts.

7. What do you think about how we plan to protect the World Heritage Site in terms of ensuring appropriate development takes place?

Edinburgh's success has not been because it has retained the same buildings since time immemorial. The built environment and individual buildings have constantly adapted and there is never a greater need for adaptation arguably, than today. To meet the community, commercial and residential demands of today while preserving the historic culture and attraction of the city is a key challenge. The need to adapt to a net zero carbon emission future adds to this challenge. In addition, the growth of the modern tourist industry also places more demand on the built environment than it previously did so. But we need to adapt our heritage buildings – to allow double glazing, to adapt where we can for additional internal insulation and to support micro renewables where possible. Modern property requirements will also mean adaptations for enhanced accessibility standard. And enabling development is also vitally important to support the investment required to adapt and improve our heritage buildings. It is simply infeasible to believe that public sector or indeed charitable donations will be able to meet the enormous financial investment required to preserve and maintain our heritage stock in Edinburgh. Indeed, without this it is possible that more buildings will fall derelict and potentially be lost.

8. What do you think about how we plan to advocate for sustainable tourism within the World Heritage Site and the city?

We welcome the approach to allocate visitor levy funds towards achieving sustainable tourism outcomes. We appreciate there will be competing priorities to re-invest the visitor levy revenue across various initiatives in the city, but we would advocate that the funds should be ring-fenced and prioritised in ways that will maximise the maintenance of the public realm and services to benefit tourists. We strongly urge the Council to be transparent in how the funds are allocated to ensure the



levy achieves its intended goals. Transparency will foster trust amongst businesses and residents and facilitate accountability to prevent the misallocation of the levy. When businesses and local communities are aware of the tangible impacts of how the funds have been re-invested into the local area then this will help to foster a sense of pride and encourage better collaboration.

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