



Submission to public consultation on 'Agenda Touringcar 2020-2025'

European Tourism Association (ETOA)

19.11.19 Brussels

Contact: policy@etoa.org

ETOA commends the city for providing such detailed information, allowing a broad set of stakeholders to participate by both translating some parts of the plan, and allowing submissions in English.

ETOA is a trade association of over 1300 members, a quarter of which are travel trade buyers; the rest are suppliers, destinations and other stakeholders. It has taken careful note of the views of its operator members who sell Amsterdam as a destination worldwide and has consulted its members who run business within the city: attractions, retail, walking tours, accommodation. www.etoa.org

A. Main concerns

ETOA agrees with the city's identification of the following objectives in its policy: protection of bridges and quays; improvement and protection of air quality.

The third main objective - reduce nuisance by coaches – is more complex:

1. The report states (p10) that private coaching ('touringcar') constitutes 0.3% of traffic. On the face of it, therefore, it seems disproportionate to focus so much on restricting it – excepting restrictions related to weight limits imposed to protect the fabric – given the effect on overall traffic.
2. Reducing coach operations creates a demand for alternative transport where easy access on foot is not an option.
3. Groups of people getting from A to B on public transport, often with luggage, can itself give rise to nuisance (the possibility of banning coaching creating nuisance is recognised within the report).
4. Reducing service levels provided to visitors through withdrawal of a convenient transport amenity causes a nuisance; it makes sense where it is a consequence of protecting the urban fabric, promoting traffic flow and optimising carrying capacity. It is important that restrictions are not seen as a form of prejudice against a certain class of visitor.
5. To the extent that the visitor economy, of any destination, competes with domestic demand, there is a compromise to be sought which entails a definition of 'acceptable' levels of inconvenience or nuisance; the definition of nuisance needs examination.
6. If residents do not like something, does that make it an actionable nuisance, and/or must the impact of its reduction first be assessed before further restriction is mandated?
7. Is the city satisfied it has taken sufficient steps to promote awareness of and enforce current regulation before embarking on a further round of restriction?
8. If not, is there sufficient basis to know that further restriction to the degree set out is necessary?

9. Service providers within the restricted zone will be affected and may need a mitigation plan. Some may risk going out of business in consequence. The report makes the following assertion (p39):
- *We aim to take these measures at a pace that ensures that the city's residents see concrete results, fast, while also giving the coach industry and our major attractions time to adjust to the new measures.*
 - We would be interested to know if the city's intention is to provide any guidance or support as to how such 'adjustment' may be made in response to barriers being erected to a significant source of potential business.

B. Comment on detailed proposals

We would welcome further clarification and commentary on the below points:

1. Coaches travelling to hotels not on the mandatory coach routes:
 - a. Transferring to smaller coaches under 7.5 tonne will add to congestion and worsen air quality with more vehicles
 - b. If public transport is to be used, this poses a risk management issue for groups of school children and will also be inconvenient for other passengers without luggage. Bruges has implemented a plan (<https://www.visitbruges.be/coaches>) that allows access to the city centre for coaches travelling to hotels.
2. More stopping points for coaches along the mandatory coach routes:
 - a. As identified in the report, currently there are 44 pick-up / drop-off points that can manage 100 coaches at a time. The report estimates 625 coaches per day on average within the S100. If the stopping points are not ready by 2022 or there is too much demand for certain stops, additional congestion and nuisance will be caused to locals which are beyond a coach driver's control.
3. 4 transfer hubs or multi-modal interchanges
 - a. How will the installation of the 4 transfer hubs outside the city centre be funded?
 - b. Has consideration been made for toilet facilities and refreshments at these transfer hubs or multi-modal interchanges, for both drivers and passengers?
 - c. What is the plan for coach passengers to access the city centre if the interchanges are not operational by the time new access restrictions are due to be implemented?
4. Finalising ambitions for emission free coaches within A10 in 2025
 - a. Will coaches need to be emission free within S100 in 2022 as outlined in the clean air action plan? The use of Euro standards is more commonplace across low emission zones in European cities.
 - b. Likewise, considerable investment will be needed in electrical charging infrastructure for emission free coaches to be able to visit the city. Our anecdotal knowledge of the coaching industry suggests that parts of the industry expects to 'leapfrog' electricity and build hydrogen-fuelled vehicles, but affordable technology is still some way off. Electric vehicles typically have very limited luggage space due to battery size.

We note the following which appears to be a pragmatic response to actual operational conditions and passenger needs.

5. More pick-up/drop-off points are to be added on the mandatory coach routes. However, please see point 2 above and note that pick-up/drop-off points should have sufficient space on the pavement to allow coaches with disabled facilities to deploy and groups to convene ahead of pick-up without disrupting pedestrian flow.
6. Exemptions are being explored for certain institutions within the S100 for small children, disabled and the elderly.
7. Providing information to drivers on where to park and exploring the possibility of reserving spaces in advance. However, parking should be close to drop-off points as drivers comply to strict regulation on driving and rest time set by the European Union. Large coaches will be unable to access two coach parks within the S100 which will put pressure on other parking areas, particularly those close to the S100.
8. As above, parking areas should have facilities for drivers to use toilet facilities and obtain refreshments. Good practice is to allow drivers to wash the coach (they are often contractually obliged to do so each day) and provide a toilet drop.

C. Data and methodology

There are some factual assertions on p39 for which we would welcome more evidence and explanation. The assertions are reproduced below; our comments follow in square brackets.

1. The scale of the inconvenience coaches cause is out of proportion to their limited share in total traffic. [ETOA: We accept that coaches, when operated inconsiderately or inappropriately, can cause difficulties, but what is the nature of the inconvenience caused and how is it measured?]
2. They produce a lot of emissions for their size [ETOA: How is this measured? Coaches, especially Euro 6, are low-emission, and certainly lower than the cumulative emissions of alternative non-electric private transport that can convey the same number of passengers.]
3. They endanger vulnerable canal walls and bridges [ETOA: This is true of any vehicle above a certain axle weight, not just coaches. We accept that weight restrictions must evolve in order to preserve the canal walls and bridges, and that there will be further restrictions related to their renovation.]
4. Local residents have to deal with:
 - the nuisance caused by the number of coaches [ETOA: what is the nature of this nuisance? What are residents prevented from doing, and how is the quality of their life adversely affected, by coaches? How are these things measured? We note volume of complaints from residents in relation to parking: how is the threshold of 'acceptable' nuisance established, beyond which action must be taken? There is a high degree of subjectivity in relation to public sentiment about tourism. We recognise and respect the primacy of local opinion in influencing policy and note that coach emissions – for example – are much lower now than they used to be. A great deal of congestion is caused by affluence: more people have more cars.]
 - the noise they make [ETOA: How noisy are coaches as compared with other vehicles?]

- the size of the vehicles [ETOA: Accepting that the size of the vehicles is inherently visually intrusive, how is the nuisance attributable to their size balances against the nuisance caused by the number of vehicles that can convey the same number of passengers?]
- unsafe traffic conditions [ETOA: Safety is operators' primary concern. Is there traffic data to show accidents attributable to private coaches versus other classes of vehicle, e.g. city transport and smaller private transport?]

We remain at your disposal should you have any questions.

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