



## Memorandum: Amsterdam Coach Plan (Sept.2021)

### Introduction

ETOA is a trade association with members throughout the European supply chain and origin markets worldwide. We work closely with DMOs: at time of writing, we have 88 regional and local destination management organisations within our membership.<sup>1</sup> We participate in various initiatives related to sustainability coordinated by the European Commission, UNWTO and others.

Following consultation with local stakeholders, this memorandum is intended to inform continuing discussion in relation to managing coach access, in particular the proposed introduction of timed access slots at set locations for dropping off and picking up passengers. We question whether 2022 would be an appropriate time to add complexity and cost to a sector already under major stress.

In November 2019 we submitted a response to the public consultation on **Agenda Touringcar 2020-2025**.<sup>2</sup> The pandemic has added emphasis to some of its content. For example, safety concerns make the availability of efficient private transport options for groups desirable for visitors and local transport passengers alike.

From January 2022, only Euro VI coaches will be permitted, and in practice none will be allowed inside S100 other than on certain very limited routes in order to “make the central district as coach-free as possible” by 2022.<sup>3</sup> Hotels and other service providers within the affected zone cannot accept business from groups with luggage: this adversely affects their competitive appeal.

Amsterdam’s losses from tourism in 2020 alone are estimated at €8billion<sup>4</sup>. These include loss from conferences which, like group leisure tourism, often rely on coach transport for transfers. Therefore, the necessity to ensure that any plan properly considers both operational and economic interests is clear. These align with the interests of the wider community.

We detect rising concern among local stakeholders that the proposed provision for inter-modal hubs is insufficient, both in terms of capacity and location. That, together with the possibility of the new access management system, is causing a deterrent effect among their clients: operators cannot price product in Amsterdam while the operating conditions remain uncertain.

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<sup>1</sup> Source: <https://www.etoa.org/member-search/?term=&type=Destination+Marketing+Organisations&country=&c=> accessed 28 August 2021

<sup>2</sup> ETOA’s previous submission to public consultation may be accessed via the following: <https://www.etoa.org/wp-content/uploads/2021/08/ETOA-Agenda-Touringcar-2020-2025-consultation-submission.pdf>

<sup>3</sup> Locations within the S100 that will remain accessible are with the exception of the S100, Weesperstraat, Valkenburgerstraat and southern banks of the IJ. Source p39 <https://www.amsterdam.nl/parkeren-verkeer/touringcar/beleid/> Accessed 28 August 2021. More details in Annex.

<sup>4</sup> Source: <https://www.rtlnieuws.nl/economie/artikel/5219958/toerisme-2020-nederland-abn-amro-amsterdam-harde-klap> accessed 28 August 2021

## Current Context

The city wishes to see a sustainable recovery. The primacy of local voice is made clear in **Vision 2025: Redesigning the Visitor Economy of Amsterdam**.<sup>5</sup>

The ambition to remain an appealing place to live, work and visit is consistent with previous work on **City in Balance 2018-2022**.<sup>6</sup> The old fabric of the city must be protected: this entails restricting access to vehicles according to weight. This is necessary and desirable. But the motives behind other moves affecting group tourism are less easy to discern.

In addition to coach access plans that go beyond those necessary to protect the physical fabric of the city, group tourism has been the subject to increasing restriction and tax. Recent examples include a ban on group tours of De Wallen and the introduction of VMR. Amsterdam is the only city in Europe to have an overnight tax that is a function of a flat rate and a percentage, adding operational complexity for group operators. With VMR, it is the only city in Europe attempting to tax third parties established outside its jurisdiction who sell group tourism products such as canal cruises and city tours to prospective visitors worldwide.

The city's plans are commendably community-centric: they are about people. But while Agenda Touring Car focuses on the vehicles, scant regard is given to the people they carry. The English summary of the plan asserts: "coaches fill a niche where public transport options are unavailable."<sup>7</sup> This shows limited understanding of the private coach hire business, for which public collective transport alternatives may be available, but private collective transport is preferred for reasons of service, safety, convenience, or cost. People also run local businesses dependent on group tourism.

The ambition to "create a coach-free area between the S100 and the A10 orbital motorway by 2025" is unaccompanied by any indication how this might be achieved. Is the intention to prevent any group arriving with luggage staying in a hotel within the A10? What inter-modal investment is planned? What integration is there with intra-regional transport and tourism planning?

The risk is that an impression will form of a city administration increasingly prescriptive as to the type of visitor it wishes to attract, intent on extracting revenue from those who assist its export economy, and one which believes that taxation is an effective means of capacity management. All of these are problematic for a city that prides itself on inclusion, openness, and liberal values.

Tourism is the product of consumer sentiment and discretion: it is not a command economy. Collecting taxes from remote organisations is challenging, questions of fairness aside. Unless group tourism is considered intrinsically harmful and thus an appropriate candidate for deterrent pricing, there is divergent opinion as to the practicalities and propriety of using taxation to control demand as opposed to collect necessary revenue from which taxpayers should receive reciprocal benefit.

Coach transport, done well, will be part of travel and tourism's shift to more sustainable practice. If Amsterdam proposes to make its operation near-impractical, the conclusion that it does not want groups business of any kind will be inescapable, and the market will respond accordingly. Coming at a time during the current pandemic when the Netherlands is taking a much more 'closed' approach to e.g. the US market than, say, Italy, the fairness and rationality of its primary gateway city's transport policy will be subject to close scrutiny by operators and others planning future business.

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<sup>5</sup> Accessed via <https://www.iamsterdam.com/en/our-network/amsterdam-and-partners/research-and-intelligence/sustainable-visitor-economy> on 28 August 2021

<sup>6</sup> See [https://assets.amsterdam.nl/publish/pages/868689/programme\\_city\\_in\\_balance\\_2018-2022\\_1.pdf](https://assets.amsterdam.nl/publish/pages/868689/programme_city_in_balance_2018-2022_1.pdf) accessed on 28 August 2021.

<sup>7</sup> Ibid.

## Issues arising

### Purpose

- What is the problem that the city is trying to solve, and how will the proposal achieve that?
- See previous submission to public consultation, whose content is still relevant. In addition:
  - Pandemic has added to need to assure private transport
  - Might better enforcement of existing regulation rather than additional restrictions achieve sufficient benefit?
  - What evidence is there of adequate enforcement of existing regulations, as evidenced by, say, data on nationality of drivers or country of vehicle registration?
  - Group travel is a fundamental part of the visitor economy: from MICE to leisure.
  - Changing demographic and issues around accessibility will tend towards making coach travel popular among seniors and school groups.
  - As above, it is seen as a safe alternative to public transport: good news under current precautionary conditions
  - Euro VI coaches among the most efficient road transport
  - No-carbon long-distance coaching not yet possible: strategic investment to accelerate practical options for low/no-carbon alternatives is required.

### Politics and perception

- Any controls on coaching are likely to be seen as a measure to control demand (as tax): is this a political risk the city wants to run?
- Stricter rules tend to affect locals or at least NL providers more as they will be subject to more assiduous policing (easier to enforce parking ticket etc.)
- Local services economy that has had a very tough time in 2020-21 will have its client base further eroded: incoming group tourism providers have found themselves cast as the bad guys, and yet groups cause little nuisance relative to other aspects of the visitor economy.
- Long-haul tourism brings significantly higher spend than domestic and intra-European.
- Schemes that don't work cause political fall-out
- It NL wants to disperse overnight tourism, day-trips to Amsterdam must be enabled: if Amsterdam makes them harder, the domestic tensions increase
- There is heightened risk of legal challenge based on scheme's rationality or efficacy at addressing stated harm
- Current rules poorly or at least erratically enforced
- Deterrent effect (intended or unintended) is created through:
  - Cost and operational complexity<sup>8</sup>
  - Uncertainty: if you cannot be sure of access, will you include the city?
  - Unwelcome impression from the NL's largest intl gateway

### Practical impact and consequences

- One cannot accurately predict arrival times due to traffic and long inbound journeys
- Vehicles and/or drivers can switch at last minute for operational or tech reasons but permit transferability tricky to manage; people get lost
- Slot management and related booking and payment systems are hard to manage.
- There are alternatives. For example, allow coaches with luggage access to hotels (see <https://www.visitbruges.be/coaches>).<sup>9</sup>
- The city will deter groups of 'culture' tourists from staying multiple nights.
- Introducing a flawed system risks reputation for good, evidence-based governance.

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<sup>8</sup> For materials on the deterrent effect of Rome's proposals, see previous ETOA studies: <https://www.etoa.org/wp-content/uploads/2020/09/Proposed-regulation-to-restrict-coach-access-in-Rome.pdf>  
<https://www.etoa.org/wp-content/uploads/2020/09/Value-and-volume-of-overnight-group-travel-in-Rome.pdf>

<sup>9</sup> Other options for ideas and/or corroboration that proposal is likely to achieve intended results may be found here: <https://urbanaccessregulations.eu/>

## Annex

### Amsterdam's coach plan<sup>10</sup>

**Introduction and analysis** Coaches fill a niche where public transport options are unavailable. Many different groups of passengers travel by coach: tourists, older people, members of sports clubs and schoolchildren. The scale of the inconvenience coaches cause is out of proportion to their limited share in total traffic. They produce a lot of emissions for their size, they endanger vulnerable canal walls and bridges, and local residents have to deal with the nuisance caused by the number of coaches, the noise they make, the size of the vehicles and unsafe traffic situations.

**Objectives, blueprint for the future and strategy** The Coach and Tour Bus Agenda 2020-2025 aims to tackle the nuisance caused by coaches. The Agenda focuses on three concrete objectives:

1. Coaches should be emission-free and no longer contribute to the high concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) in the city;
2. No large, heavy coaches should cross vulnerable bridges and canal walls;
3. The nuisance caused by coaches, particularly when parking, should be minimized.

**The future blueprint aims to:**

1. Achieve a coach-free city centre by 2022;
2. Make the central district as coach-free as possible (with the exception of the S100, Weesperstraat Valkenburgerstraat and southern banks of the IJ) by 2022;
3. Create a coach-free area between the S100 and the A10 orbital motorway by 2025.

The measures in this agenda are designed to achieve a restrictive approach. Wherever possible, coaches will be directed to the outskirts of the city. They will only be welcome in the city if they meet our strict conditions (weight, emissions and size) and if they take routes where they cause no nuisance. This continues the policy direction set out in the Clean Air Action Plan (Actieplan Schone Lucht), Car-free Agenda (Agenda Autoluw), City in Balance (stad in balans) and Bridges and Canal Walls Action Plan (Actieplan bruggen en kademuren).

**Range of measures** To achieve these goals, eight measures have been proposed and adopted for the period up to 2025.

**Direct coaches to the outskirts of the city and concentrate them on main roads**

1. Limit the number of coach routes in the central district
2. Provide coach stops along the coach routes;
3. Facilitate interchanges with other forms of transport;

**Coaches permitted only where appropriate and only if they meet strict conditions**

4. Re-evaluate the 7.5 ton zone;
5. Finalize ambitions for emission-free coaches;
6. Encourage the use of coach parking facilities and discourage on-street parking

**Comply with the rules for coach facilities**

7. Coach stop management to ensure efficient use of stops;
8. Take an information-centred, intelligent approach to enforcement.

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.

**Implementation and monitoring** The Coach and Tour Bus programme from the department of Mobility and Public Space is responsible for implementing the measures. Measure 5: "Finalize ambitions for emission-free coaches" will be developed by the Air Quality programme in close coordination with the Coach and Tour Bus programme. The only way to successfully combat the nuisance caused by coaches in Amsterdam is with the active cooperation of everyone concerned: the industry, destinations, enforcement partners, the districts and permit providers. The measures will be monitored on a yearly basis to see how well they satisfy the three objectives relating to air quality, the protection of canal walls and bridges, and nuisance reduction.

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<sup>10</sup> The plan is summarised in English on p39 of Agenda Touringcar 2020-2025, accessed via [https://www.amsterdam.nl/parkeren-verkeer/touringcar/beleid/touringcaragenda-2020-2025/?PagClsIdt=15788026#PagCls\\_15788026](https://www.amsterdam.nl/parkeren-verkeer/touringcar/beleid/touringcaragenda-2020-2025/?PagClsIdt=15788026#PagCls_15788026) on 28<sup>th</sup> August 2021.