



**SCOTTISH
TOURISM
ALLIANCE**

Your voice in tourism matters

Scottish Tourism Alliance Submission

West Dunbartonshire Visitor Levy Scheme – Formal Consultation

1. What is your connection with West Dunbartonshire? (please select all that apply)

Other (please specify) X:

The Scottish Tourism Alliance (STA) is the largest member organisation for tourism and hospitality businesses in Scotland and the leading representative body for the sector, which includes direct and indirect membership of West Dunbartonshire tourism and hospitality businesses.

2. The draft scheme proposes a 5% levy rate on overnight accommodation costs, do you think this rate is set at the correct level?

I think the rate should be decreased X

3. Do you agree that a levy if implemented should cover the full West Dunbartonshire area?

No X

4. The draft scheme proposes that a proportion of annual income be used for participatory budgeting where the local community could decide how it was spent, do you agree with this proposal?

Yes X

5. If implemented, it is proposed that the income will be utilised through the following investment streams.

Can you please rate these in order of importance. 1 being the most important through to 6 being the least important.

Operations and Infrastructure;

Culture, Heritage and Events;

Climate Change Adaption;

Environmental Protection and Conservation;

Tourism Marketing and Management;

Tourism Business and Skills support.

Answer left blank due to lack of details about objectives and use of net proceeds in the visitor levy scheme proposals.

6. Are there any investment streams that you think are missing from the above list?

It's very hard to identify what investment streams are missing without knowing the scheme's objectives and any detail behind the headline investment streams, including plans for weighting of funding between these areas and what the council's ambitions are to enhance and grow tourism in the area through the levy.

There is currently no information in the scheme proposals or consultation about whether accommodation providers will be able to retain any of the money collected to help cover their costs. We're also concerned only 6.9% of businesses responded to your last survey, compared to 86.5% of residents, and unclear if there's any direct business engagement.

The STA encourages any local authority considering a scheme to ensure detailed and robust consultation and economic impact assessments are undertaken to make an informed decision. However, the proposals only reference assistance from Glasgow City Region Intelligence Hub and an income forecast of just £1.7m, with no supporting data or context.

7. Who do you think should be represented on the visitor levy forum if established?

The forum should include businesses engaged in tourism and tourist organisations, with ideally representation from all parts of the accommodation sector. Organisations or bodies with a key role in the development of the local visitor economy should also be considered as members, such as major cultural events & festivals, and visitor attractions & heritage.

Concerning the creation of a Visitor Levy Forum, we believe that its terms of reference should give weight to the advice given by the forum when it comes to levy resource decisions, ensuring that there is buy-in from industry and local communities. This will help to safeguard that the levy has a positive economic growth impact, with recognisable positive outcomes for the city's local visitor economy and offer.

Rather than waiting for the creation of the Forum, we would urge the Council to create a VL Reference Group with key industry representatives to help inform a potential scheme, which is the approach of Highland Council.

8. Having considered the content of the draft proposal, we want to check if your opinion has changed. Overall, on a scale of 1 to 5, where 1 is strongly agree and 5 is strongly disagree, how would you rate your general support for introducing a Visitor Levy in West Dunbartonshire?

Strongly disagree X

9. Do you have any other comments/feedback that you would like to provide in relation to the implementation of a visitor levy in the West Dunbartonshire area?

The STA does not believe that the consultation meets statutory guidance for local authorities to be considered a formal consultation, as it fails to ask many of the questions needed to properly inform a levy scheme, e.g. exemptions, scheme objectives, cap on nights, applying the VL at different times. It is also not clearly identified as the formal statutory consultation required under the Visitor Levy (Scotland) Act. We strongly urge the Council to revisit its consultation to ensure its compliant with the legal guidance.

There's lack of transparency and accessibility in presentation and evidence base, with the survey design reliant on respondents to read the full scheme proposal with very few opportunities to give comments and limited answer options.

The visitor levy proposals have very little detail to make an informed decision, including no indication of how the council plans to use and allocate the net proceeds raised from a levy.

Implementing a scheme prematurely and without adequate consideration risks having a damaging impact on accommodation providers and the local visitor economy.