

Andrew Kerr
Chief Executive
City of Edinburgh Council
City Chambers
High Street
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Dear Andrew,

Edinburgh City Centre Transformation

The Federation of Small Businesses (FSB) welcomes the opportunity to contribute to the City of Edinburgh Council's consultation on the Edinburgh City Centre Transformation. FSB is Edinburgh and Scotland's leading business organisation and aims to help smaller businesses achieve their ambitions. These micro and small businesses comprise the majority of all enterprises in Edinburgh (90%), provide one in four private sector jobs (28%) and contribute £7bn to the city economy.

FSB welcomes the Council's City Centre Transformation plan and its potential for a cleaner, safer and more attractive Edinburgh. Small businesses are ready and willing to play their part in creating a city centre fit for the future, however they require time and support to transition to what will be a radically different city centre. Though the plan is comprehensive and visionary, many small businesses will be concerned about how some of the provisions, for instance car-free streets, impact their ability to earn a living. Indeed, it should be recalled that 61% of households in Edinburgh have access to at least one car.

FSB's priority is to ensure that Edinburgh's small businesses play their part and that their sustainability is given full consideration during the process of change. The City Centre Transformation programme will open up opportunities for new and existing businesses in Edinburgh but it will also require a change both in mind-set and in business planning if these firms are to survive and thrive.

This is particularly true of businesses in the city centre area which will be most affected by new restrictions on traffic movement, parking and street environment. For these businesses, the key impacts will be on customer access, deliveries of stock, supply of goods to customers, etc. Whilst for many these issues are not insurmountable, many of the potential solutions will need to be tested to ensure that they are deliverable. For example, electric bike deliveries will be tested during the tram extension works in and around Leith Walk, starting in 2020, but this may not

give enough time for learnings to be applied for Old Town street closures commencing in January 2021.

Equally, the city's 'car free Sundays' currently in operation may not provide the volume and quality of data required to extrapolate to full and permanent traffic closures on these streets.

That is why FSB recommends that the Edinburgh City Centre Transformation be preceded by a full and detailed Business and Regulatory Impact Assessment designed to map out the impact of the scheme on the widest range of businesses in Edinburgh city centre. This will help to prepare businesses for the scheme and inform the council of areas which could be effectively addressed to smooth the transition for the private and public sectors alike.

At the same time as this consultation, Edinburgh businesses are also examining the Council's proposals for a Low Emissions Zone in the city, which contain sensibly balanced transition periods towards cleaner vehicles. These transitions may be short circuited by street closures coming into force from January 2021 and businesses will need to have a holistic picture of how a range of related council policies will impact them collectively – whether that be the City Centre Transformation, the LEZ, the Workplace Parking Levy and the Council's plans to invest in electric vehicle charging infrastructure.

On a wider front, they will also need to factor in the development of the new Scottish Transport Strategy and Strategic Transport Projects Review, and the introduction of new environmental regulation, such as the Deposit Return Scheme.

Central to many businesses' thinking will be their future strategy for the delivery of stock and how the City Centre Transformation will affect this. Many small businesses stock a range of goods, often sourced from a wide variety of suppliers. As they do not have the space to stock large quantities of goods, unlike larger businesses, they rely on regular, just-in-time deliveries. Indeed, it is central to their business model.

Therefore, FSB recommends that the Council undertakes detailed consideration of how a new delivery system, such as freight hubs, will impact businesses. This is true of city businesses located in commercial premises but equally for home-based businesses and mobile businesses (joiners, central heating engineers and so on). Likewise, the impact of businesses outside of the Council's boundary should be closely scrutinised given the importance of Edinburgh to the Scottish economy.

This is another factor which may have a bearing on the implementation timescale given the transformation programme will also impact on the range of businesses able to operate in the city centre. For example, on the streets affected by a traffic ban,

the retail of bulky goods may be impractical and this may require businesses to change strategy or to relocate.

FSB and our members are keen to ensure that the vision for the city is implemented in an engaged and joined-up manner and we are keen to involve our members in the council's planning for this strategy. As such, please do not hesitate to get in touch if you would like to discuss these points in more detail.

Yours sincerely,



Garry Clark
Development Manager – East of Scotland