

Choices for City Plan 2030 Responses

Choice 13 - Supporting inclusive growth, innovation, universities and culture

13A We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh.

Total responses - 638

Agree 83% (530)	Disagree 17% (108)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Culture should be articulated across the plan as a whole. • Tourism sector may well be less sustainable in the near future. • Policies should support the development of not for profit and social enterprise. • It would give useful guidance for development management, where applicants propose a change of use or adaptability of a building in order to deliver projects and new business opportunities. • New policies for culture and tourism must include an assessment of the capacity of Edinburgh to accept more growth in these sectors without detriment to housing for residents and their quality of life. • The areas identified in Map 16 (Areas of Support) are too restrictive. • Success of this strategy depends on strong leadership and ownership from the Council, Edinburgh Business Forum, and the Edinburgh Partnership. The progress with the Edinburgh 	<ul style="list-style-type: none"> • Supporting increased tourism in a city suffering from over tourism is not helpful in creating a balanced or sustainable economy. • It must provide a healthy and receptive ground for visiting cultural activities and visitors but importantly must not lose sight of its all-important residents and those who work in the city. • A more nuanced and detailed approach is required, not all aspects supported, e.g. parts of City Centre Transformation. • The Royal Highland Showground should be specifically identified. • Specific policy support should be provided by City Plan for the Riccarton Campus. • Wording should be expanded to provide policy support for commercial enterprises with strong relationships or functional links with the university and not permit other forms of 'standalone' development. • 'Good growth' must attract start-ups, individuals and businesses to live and work in Edinburgh – 	<ul style="list-style-type: none"> • The Edinburgh Bioquarter should be allocated to allowed mixed use development, including residential development, with an updated master plan/place brief. • RBS Gogarburn should be identified as a Strategic Office Location and removed from green belt.

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>Economy Strategy and the Partnership working is not known.</p> <ul style="list-style-type: none"> • Economic policies should support quality of life in the city, and in particular the quality of life of residents. • The plan should commit itself to policies which foster a high value, high pay economy, and create a dynamic and economically successful city. • Supporting a balance of sectors and opportunities. • City Plan 2030 must have a range of policies in place which are sufficiently agile to enable a timely citywide response to the challenges and opportunities of a dynamic technological culture. • The preferred strategy choice however is opaque. • Innovation space and incubation space specifically covered and encouraged by this policy. This choice should also reference to research. • By allowing for the use of EW 1d land at Seafield for energy recovery, as policy RS 3 provides for, the low carbon sector would be supported in a number of ways. One would be the facilitation of district energy based on 	<p>and retain those already living and working here - who give long-term nourishment to the city.</p> <ul style="list-style-type: none"> • Does not need policy to support these good causes. 	

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>supply of low carbon heat from an Energy Recovery Facility. The ERF in turn could assist and potentially host related businesses in the resource recovery sector.</p> <ul style="list-style-type: none"> • Problems include reuse of good housing stock by University of Edinburgh and damage caused by speculative developments. • Support needed for other communities not just city centre. • Concentration on west Edinburgh risks sprawl. • Pentland Trail Centre development as a significant recreational facility which can assist in supporting inclusive growth, innovation, tourism and culture. • Given the climate crisis new growth should be green. • Policy should be focused on well-being rather than growth. • Public spaces should not be used for commercial profit. 		

Choice 14 – Delivering West Edinburgh

14A We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites.

Total responses - 576

Agree 76% (439)	Disagree 24% (137)	Comments / other issues raised
Reasons for agreeing	Reasons for disagreeing	
<ul style="list-style-type: none"> • City Pan 2030 should take account of the West Edinburgh Study. • A balance is required between the west and south east of the city. • The Saica site (Site Ref: 281 ‘Turnhouse Road) should be given strong support via a flexible site specific allocation. • Important to identify individual, sustainable sites which can support a range of uses including housing. • The West Edinburgh Spatial Consultation requires further refinement. It is out of sync with City Plan and the Transportation Assessment requires re-calibration to take account of the preferred choices within City Plan. • The requirements of Edinburgh Napier University should be considered in the future strategy for the area. • Transport to and from the airport is very poor. • In all strategic allocations there should be a requirement for Class 8 Use, as a retirement community. 	<ul style="list-style-type: none"> • The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl. • Unclear of the merit in considering future uses within West Edinburgh (without being site specific), when the vast majority of the study area is either currently allocated or is proposed to be allocated in this plan and thereafter delivered. It would make more sense to identify a wider “area of search” from the Firth of Forth to the Pentlands, to properly consider West Edinburgh in its fullest sense. • Existing road cannot cope with the traffic. • Concerns about coalescence and impacts on infrastructure in West Lothian for development close to the boundary. • An area of search approach provides no certainty beyond continuing uncertainty which would give rise to blight. 	<ul style="list-style-type: none"> • In the absence of the further work and outcomes that Stage 2 of the ESSTS will define, it is premature to identify Newbridge (Corridor 7) and omit West of Hermiston (Corridor 8) simply on the feasibility of a tram extension. Therefore both Newbridge (Corridor 7) and West of Hermiston (Corridor 8) should be considered further with all sustainable modes of transport including train and bus rapid transit as part of an area based study of West Edinburgh. • It is unclear from the Choices document how sites within the proposed ‘area of search’ will be brought forward, and under what policy criteria they will be considered. It is also uncertain how this proposal allows for robust environmental assessment of site proposals (both individually and cumulatively)

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Need to allocate land for specific uses in order to understand the transport infrastructure required and appropriate developer contributions. • Both west Edinburgh transport corridors should be supported. • Support any proposal to improve public transport infrastructure in the West of the city including the tram extension to Newbridge and increasing capacities at park and ride facilities. • Fife Council have concerns if the expansion of West Edinburgh was of significant scale. • Safeguarding and utilising existing natural assets in a planned approach to development of strategic, interconnected and multi-functional green / blue networks is an essential part of delivering long term sustainable city growth in this area. • Although we agree that City Plan 2030 should take account of the West Edinburgh Study findings when available, it will be important for it to be interpreted in consultation with local communities. • Large parts of the area identified as “West Edinburgh” is classed as flood plain and should 	<ul style="list-style-type: none"> • Proposed approach risks encouraging more inner city dereliction, and the using up agricultural land. • Turnhouse Golf Course should be excluded from any development and kept within the green belt. • The 'area of search' approach creates a permissive environment for the exploitation and destruction of the west of Edinburgh greenbelt. 	

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<p>be protected as part of a multifunctional green and blue network.</p> <ul style="list-style-type: none"> • It is however considered that the infrastructure which is proposed to West Edinburgh such as education facilities, can be of benefit to a wider area than just West Edinburgh. • Innovation space and incubation space and research specifically covered and encouraged by this policy. • Impacts of the future recovery of the City in a post Covid-19 environment and changing requirements. • Tram route should be extended to other parts of west Edinburgh. • Needs to be coordination with development in West Lothian. • Impacts of airport noise should be taken into consideration. • As the area is noisy it’s an opportunity to locate noise producing developments. • Mainline stations at Kirkliston or Winchburgh would ease pressure on existing infrastructure. 		

14B We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses.

Total responses - 539

Agree 54% (293)	Disagree 46% (246)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • The current safeguard and reference in National Planning Framework 3 sterilises the site for alternative uses and this needs to be removed in order for the other uses to come forward, such as residential development, to accommodate sustainable and inclusive urban growth. • Reallocation for different uses could have a significant impact on Fife. • It is a good strategic site and has been safeguarded for long enough without any firm proposals coming forward. • The area is already mostly given over to commercial use and has good transport links however any developments would have to include an upgrade to the transport infrastructure. • We agree that flexibility in approach will aid delivery and welcome a dynamic approach to identifying appropriate use mixes for future development. • New uses for this site should be encouraged. • The existing safeguard seems unnecessarily restrictive. • Seems to fit well with the priority given to that corridor (International Business Gateway and towards Newbridge), with good public 	<ul style="list-style-type: none"> • Includes reference to residential development – which should not be supported in an unsustainable and unsuitable location particularly where road infrastructure is already at or over capacity. • The identification of the Norton Park site for a specific reason and user does not justify allocation for other uses. If the reason for its identification and safeguarding have gone then there is no automatic justification for identifying the land for development without specific locational justification. • If the very western part of the site is developed as an extension of Ratho Station – then impacts on infrastructure and access to the showground should be mitigated. • Until such time as the next National Planning Framework does or does not identify Norton Park as part of the strategic airport enhancements National Development with other associated uses, City Plan 2030 is required to accord with the requirements of NPF. • As greenfield sites are not part of the preferred strategy do not agree with the change of the safeguard of this site. • Question the wisdom and desirability of further urbanising the area surrounding Edinburgh 	

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>transport links. This seems much better than the strategic area identified in the previous LDP.</p> <ul style="list-style-type: none"> • Only if involved sustainable architecture and improved/restored biodiversity in the area. • Provided new uses respect its semi-rural character of the area. • Should be used for sporting uses such as a stadium venue, concert venue etc 	<p>Airport. The western side of Edinburgh is already heavily developed, and heavily congested, with more housing and associated infrastructure being delivered in the near term. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate 'arrival' rural setting to the airport for Scotland's capital city.</p> <ul style="list-style-type: none"> • The Council has not provided a rationale for the proposed removal of the safeguarding and the reallocation of the Norton Park site for alternative uses (i.e. housing). • Furthermore, it is considered that the proposed deletion of the safeguarding pre-empts any future decisions by the Scottish Government on land uses within West Edinburgh as part of the preparation of National Planning Framework 4. 	

14C We want City Plan 2030 to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange.

Total responses - 527

Agree 56% (293)	Disagree 44% (234)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • However, it will add substantially to the numbers of new housing already proposed for Maybury/Turnhouse (HSG19), increasing the need for infrastructure and access to greenspace. • Proximity to airport e.g. noise, air quality etc. in respect of adverse impacts on residential amenity, it is not considered that it is suitable for housing. • If it is not being used as an airport it makes sense to release for other uses. • Critical that Sustainable Transport Corridors are implemented in conjunction with any proposed development if additional burdens on the bypass, bridgehead and further cross boundary trips are to be avoided. • Provision required of adequate roads capacity at the Gogar and Maybury Roundabouts and the link road between these and impact on air quality. • Mixed use development of Crosswinds should relate to other adjacent land uses and will benefit from strategic infrastructure provision. • Appropriate joined up development providing new access and infrastructure in a coordinated manner would link with other allocated sites at Cammo and Turnhouse. 	<ul style="list-style-type: none"> • Question the wisdom and desirability of further urbanising the area surrounding Edinburgh Airport. The western side of Edinburgh is already heavily developed, and heavily congested. The comparatively undeveloped surroundings of Edinburgh airport provide a contrast to the expanding urban sprawl and an appropriate ‘arrival’ rural setting to the airport for Scotland’s capital city. • The City Plan should identify the site has split ownership now, this brownfield site is no longer all owned by the Airport. • At this stage it is premature to identify specific areas for development in West Edinburgh. • Danger of over saturation of development without the necessary infrastructure to support it. • Until such time as the next NPF does or does not identify “crosswinds runway” as part of the strategic airport enhancements National Development, City Plan 2030 is required to accord with the requirements of National Planning Framework 3. • Pre-empt the findings of the West Edinburgh Study and the content of National Planning Framework 4. 	

14C We want City Plan 2030 to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange.

Total responses - 527

Agree 56% (293)	Disagree 44% (234)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Setting of A listed Castle Gogar should be protected (and mitigated) as far as possible. • Depend on the nature of the alternative uses and their layout and design. • Support measures to improve the Gogar Burn to address existing and future flood risk. Scottish Environment Protection Agency currently reviewing it. • Edinburgh Napier University request that their requirements are considered by the Council in any future strategy for development, growth or expansion in the area. • Helps to justify £41m spent on Edinburgh Gateway. • Must improve active travel and public transport. • But should not facilitate more air travel in a climate crisis. • Continued growth of air travel not guaranteed, e.g. impact of covid-19 and rise of telecommuting. • Should be used to build an alternative access road to the airport. • Helps to justify £41m spent on Edinburgh Gateway. 	<ul style="list-style-type: none"> • If there is a realistic expectation that these sites will come forward for development they should be included within the Plan. • Traffic at Gogar Roundabout is already congested in terms of existing traffic and traffic generated from the Cammo proposals. • The focus should be on existing sites within the current LDP in the first instance and where a broader mix of land uses at these locations can help to deliver the aims and objectives of City Plan 2030. Land at Edinburgh 205 should be prioritised ahead of new allocations. • Should resist any form of greenfield development. Air transport, passenger as well as freight will for certain in any imaginable future become less acceptable for obvious environmental reasons. So we should do nothing to further facilitate it, starting now. • Short sighted, may be needed for airport growth and in the face of climate change. • Should be kept for safety reasons. • The interchange area is not well planned or used 	

Choice 15 Protecting and supporting our city centre, town centres and existing offices.

15A We want to continue to use the national ‘town centre first’ approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities.

Total responses – 666

Agree 87% (579)	Disagree 13% (87)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • More focus on needs of residents and their positive effect on retail demand. • The role of town centres has changed and continues to change. Edinburgh is clearly the regional core for south east Scotland and as such the city centre has a clear and important role to play in enhancing and protecting this status. For this to be successful the appropriate transport infrastructure must be in place both locally and regionally. • Provided it is properly accessible for local residents by public transport. • Not all leisure uses can be accommodated in a town centre location. • Recognise the value of opening stores in these locations to boost the vitality and viability of protected centres. Despite this, given the make-up and composition of some centres across the city this is not always feasible hence the development of ‘edge of centre’ locations which can help reinforce centres. • Covid-19 has had an impact on retail and impact on ‘over tourism’. • Concerned at an emphasis of its function as a tourist centre and regional shopping centre, 	<ul style="list-style-type: none"> • The policy needs further review as online shopping has accelerated due to the corona virus crisis, a trend which is not likely to revert to what it was before. Therefore there may be a need to encourage other City Centre uses offering greater diversity. This would create a better visitor experience compared with the same national and international brands seen everywhere. • Need to recognise that what you believe the town centre to be ... has changed ... many see the town centre mentality being something of a misnomer now ... I believe we should stop using this ‘centrality approach’ and have something similar to London boroughs which are then governed and resourced equally. • Edinburgh City centre is under too much pressure already. • This approach has led to over tourism and destruction of the city centre. Need to restrict tourism. • Move events outside of city centre. • Should focus on town centres then city centres. So city centre not adversely affecting town centres. • Retail should be kept and protected. 	<ul style="list-style-type: none"> • Policy should set out appropriate uses and for each level of centre. In line with the town centre first approach, the city centre should be protected and enhanced as the regional core of South East Scotland. The role and function of other centres should be set out with consideration for how circumstances may change over the Plan period. It is important that Policy is flexible to allow Centres, to adapt, respond to changes and to remain relevant in the future. Policy should recognise that Commercial Centres such as Ocean Terminal can offer established and well-connected sites which can support mixed uses including residential and office use to ensure their vitality and viability.

15A We want to continue to use the national ‘town centre first’ approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities.

Total responses – 666

Agree 87% (579)	Disagree 13% (87)	Comments / other issues raised
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>rather than a centre for the city of which it is a part.</p> <ul style="list-style-type: none"> • City Centre, while regarded as ‘healthy’ by many markers is being undervalued in this report, and that its status is more fragile than presented. Surprised that there is no mention of its status as a World Heritage Site and as a Conservation Area and the responsibilities therein. • Town centres are hubs for public transport and are easily accessible without private cars. Town centres, however, are often densely built up and can form canyons which trap emissions leading to poor air quality and health impacts on those who live and work in these areas. To address this, cars should be discouraged and public transport should be electrically charged. • The Town Centre first approach should allow for some flexibility. • Try and ensure that everyone in the city lives within easy reach of basic shops and services – the 20 minute neighbourhood approach. • Small independent traders need to be both protected and encouraged to operate in town centres. • Support for small convenience shops in new housing developments. 	<ul style="list-style-type: none"> • Let people shop local where possible. • Need to meet the needs of residents rather than tourists. • Need to rethink tourism in light of the climate emergency. • Too much congestion in the city centre, both cars and buses. • Need to radically review the amount of retail space we have in Edinburgh. • Retail should be out of town and centres should focus on entertainment and leisure. 	

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Agree 87% (579)	Disagree 13% (87)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Low vacancy rates are supported by the wrong type of shops (e.g. hairdressers and charity shops). • When shared transport and reduced car access are used as part of a package, then mobility hubs can be provided with placemaking as well as just the basic transport provision. In this way new life can be breathed into town centres by creating centres for people not cars. • Visitors should be encouraged to move beyond the City realm. • Hope in doesn’t result in increased commercial council tax for small businesses though. • However still requires flexibility to accommodate uses that cannot be accommodated in existing centres or are unsuitable. This policy to encourage tourism in City Centres appears to conflict with the suggested policy regarding hotels. • Need to limit shops selling tourist items. • Princes Street needs improved: top shopping and dining. • Support the 15 minute city currently promoted by world cities, aim to develop self sufficient communities within Edinburgh. This would reduce pressure on the city centre, including pollution and stress caused by long commutes. 		

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Total responses – 666

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Needs to be a major switch from retail to residential. A mix of activities should be proposed; shopping, offices, leisure, culture, entertainment and tourism and must be in balance. 		

15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647

Agree 83% (536)	Disagree 17% (111)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> But the allocation of further land for development and this will result in the identification of new local centres. Neither the local shopping areas of Edinburgh nor the city centre are immune from changing shopping habits, the growth of internet shopping and the ever-expanding offering of out-of-town shopping in the Edinburgh city region. The place principle must again be at the forefront of planning and decision making here. 	<ul style="list-style-type: none"> While some areas maybe at capacity this is not the case in other localities (e.g. Gilmerton). Again many town and local centres are restricted with little to no land availability for new retail/leisure provision. Too prescriptive, too top down. Do not fully agree with the conclusions of the Commercial Needs Study that there is no capacity or need for additional retail provision beyond Town/Local Centres. 	

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Total responses - 647

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>There may be occasions where a commercial needs study does not provide information on the non-commercial benefits of a retail or leisure development within a community.</p> <ul style="list-style-type: none"> • We think the Commercial Needs Study needs a review having regard to the corona virus crisis which has emphasised the value of local centres but also small scale local provision within easy walking distance. • Yes, but how would new farm shops fit into this policy? • Much stronger action is needed to maintain and support local centres. • Over development for years. • Will strengthen and support centres. • Success depends on improvement in public transport and parking facilities to ensure that all local shopping needs are within direct accessible reach. • A more positive policy should be adopted which promotes small-scale shopping facilities where there is evidence of a lack of food shopping within walking distance. • Cityplan should promote the reinvigoration town and local centres through partnership-based place-making involving City of Edinburgh Council, local businesses and communities. 	<ul style="list-style-type: none"> • Commercial Centres including Ocean Terminal have an important role to play in providing retail, leisure, community and visitor facilities. Commercial Centres will need to adapt to meet changing needs. • There should be a presumption in favour of any food and other necessary retail anywhere, it is very important to promote shop local wherever possible. • Not always be possible to provide new shopping in town and local centres and some flexibility may be required to permit development outwith local centres. The importance of food stores has never been so well highlighted than during the current Covid-19 pandemic. • Choice states that proposals will only be permitted where it is justified by the Commercial Needs Study. This an unusual approach, given that if a proposal is located within or 'edge of centre', of a town or local centre, then Scottish Planning Policy fully supports such development as it is of benefit to the health and vitality of these locations. • Commercial Needs Study acknowledges that qualitative improvements can still be required in certain pockets across the city. 	

15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647

Agree 83% (536)	Disagree 17% (111)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • In the post Covid-19 environment, consideration should be given to ensuring that everyone can access essential shopping services within walking distance. • However local centres may also be important service-provider locations not solely suited to addressing a lack of food shopping. There should be a degree of flexibility particularly on changes of use applications. • Plan might benefit from giving flexibility for such uses in other locations where they are brought forward on a temporary basis to activate vacant sites or spaces, or where they meet particular community needs such as space for local/amateur groups. • However, more work now needs to be done to provide food shopping locally. • Need to take into account the quality of current provision as well, chain shops have proven unreliable. • Social needs are just as important as commercial needs. • Everyone should have access to the services they need within 15 minutes walking distance. 	<ul style="list-style-type: none"> • Competition is not a planning matter and it should not be for the planning system to protect existing out of centre retailers from this. • The loss of certain local retail, commercial and community facilities can have a very detrimental impact on the communities that they are intended to serve. We have seen in the city centre the loss of many businesses that have provided essential services and employment to local residents as many have been converted into tourist-focussed enterprises. If the city centre is to remain a place that people want to live in a sustainable manner it is important that the LDP provides protection against uncontrolled change of use of such local businesses. • There should be no requirement to justify new shopping or leisure development in existing town centres. • Forcing people to walk to small scale proposals is social engineering. • Local shops tend to better serve local population, including growing populations, and their needs and decrease trips. Local shops should be promoted everywhere. • There are lots of leisure activities where space in the city centre is unsuitable. So a limit is not best for Edinburgh's residents. 	

15B - New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

Total responses - 647

Agree 83% (536)	Disagree 17% (111)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
	<ul style="list-style-type: none"> • The market should decide. • Difficult to predict the future of retailing particularly post Covid-19. • City centre not well served by food shopping. 	

15C We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

Total responses - 609

Agree 88% (533)	Disagree 12% (76)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • We fully support the LDP reviewing and identifying new town/local centres. We believe one such new Town Centre should be afforded to Gilmerton. • We support the review of existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas. • Many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. • Better integration and a more logical arrangement of villages, council wards and 	<ul style="list-style-type: none"> • The intention to 'support' walking and cycling sounds more like an intention to impose walking and cycling. • Stop basing everything on cycling as Edinburgh is not a flat city. • Some people have mobility issues. • Concerned about new centres being developed on the periphery of city on greenfield sites. 	<ul style="list-style-type: none"> • This work should be undertaken and consulted on ahead of the proposed plan consultation. • Midlothian Council considers that development of any new retail centres should be small scale, focussed on convenience shopping, and restricted to cases where new or existing communities are poorly served by convenience shopping within walking distance. Any such development would have to be fully justified, and the effect on the vitality and viability of any existing centre would have to be considered.

15C We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

Total responses - 609

Agree 88% (533)	Disagree 12% (76)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>community council areas. This should be about sustaining communities each with a 'hub' offering local services to which local people can identify and interact.</p> <ul style="list-style-type: none"> • Any such review has to start from the premise that existing town and local centres are to be encouraged. It will mean upping the infrastructure in most if not all cases. • There are many clearly defined out of town existing village centres which require policies directed at supporting them. • Accessibility of public transport should also be a consideration. • Consideration should be given to reducing the boundaries and restricting the areas of centres or including residential as appropriate uses in the centres to support existing services and to combat the decline of High Street retailing. • Town centre boundary for Portobello be extended to incorporate the Aldi store. • What if we thought of Edinburgh as a network of 15 minute neighbourhoods? • Wary that such changes have the potential to undermine existing centres if redrawn boundaries lead to important parts of existing centres being excluded, existing protections being removed or diluted, or new local centres 		<ul style="list-style-type: none"> • After Coronavirus, regarding "how retail trends develop" etc - and may be among the first to require revision.

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Agree 88% (533)	Disagree 12% (76)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>being created simply to justify new developments.</p> <ul style="list-style-type: none"> • Support the policy option particularly the Town Centre designation indicated for Leith Walk and local centres in Leith. • Development of arterial routes must protect existing local centres. • Must identify local parking provision needs including for those with mobility issues. • Proper segregated cycle routes are required. • Include out of town new centres. 		

15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Total responses - 519

Agree 55% (285)	Disagree 45% (234)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • No-one knows how things will be post Covid-19, so a huge amount of rethinking may need to be done. That will require flexibility of approach. 	<ul style="list-style-type: none"> • Support the option to remove supplementary guidance, preferring to embed such guidance within the plan. This might be done as appendices. However, this preference does not preclude supplementary updates to the Plan. 	<ul style="list-style-type: none"> • We are doubtful about the ability of planners to predict with any accuracy the future pattern and trends of retail activity. We are not sure of the value of these options.

15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Total responses - 519

Agree 55% (285)	Disagree 45% (234)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • It's an evolving and changing sector and it will be easier to adapt and change if it is Supplementary Guidance. • Although you may need the flexibility as habits change. We should also be more imaginative with existing town and shopping centres to breathe new life into them. • In supporting the continuance of Supplementary Guidance recognise the inherent flexibility of this approach, but this implies that resources will be available to enable this flexibility and agility in speedily changing markets. • It would appear be more easily tailored to the local environment than centralised guidance being included in the full City plan. However, we do feel that the existing supplementary guidance could be enhanced, or more carefully enforced than it appears to be at times.. • Guidance should be extended to local centres across the city too. • But it requires to be subject to proper consultation and approval process to ensure adequate scrutiny. • Car parking should feature in the guidance. 	<ul style="list-style-type: none"> • Policies on retail should be part of the development plan and thoroughly considered through independent examination. • Support the use of retail guidance in the Plan. Incorporating the guidance in the Plan gives a surer way of ensuring the guidance is aligned with other guidance, policy, requirements, etc. of the Plan. Supplementary guidance is too complicated and tends to allow loopholes. • Use of guidance sounds like an imposition. • Forcing trend rather than adapting results in failure. • Need a universal approach. • Covid-19 has hastened decline of traditional retail. Requires a more wide reaching strategy. • Include within appendix of the plan, but update more regularly. 	

15D We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan.

Total responses - 519

Agree 55% (285)	Disagree 45% (234)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Need coherent vision for town and local centres that's about services, modes of working and social connections too. Retail and work are moving online. Social isolation and mental health is the next crisis that planning will be asked to solve. Local centres that have 'work from' spaces reduce travel needs and bolster local businesses. • Need to promote local shops rather than chains. 		

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh.

Total responses - 631

Agree 58% (364)	Disagree 42% (267)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • We see hotel provision as part of mixed developments with retail, commercial and residential development. • New hotel provision should not be at the expense of existing residential accommodation. • The City centre has already been overdeveloped with hotels etc. • Although there is often local resistance to hotel building, it will be needed if we are 	<ul style="list-style-type: none"> • Hotels come in all shapes and sizes and respond to varying demand profiles. You should not control where/how some of these more boutique or niche hotels are proposed. • Tourism industry leaders have admitted there is an over-supply in hotel rooms. They state this is already having a "negative impact" on occupancy levels and room rates, even before a string of proposed new developments across the city are 	<ul style="list-style-type: none"> • Why would we need to take action to support more hotels? These are commercial enterprises.

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh.

Total responses - 631

Agree 58% (364)	Disagree 42% (267)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>moving away from offering full property short-term lets.</p> <ul style="list-style-type: none"> • We support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. • We support the need for differing grades of Hotel, location and throughout the city to ensure the spread of related economic benefits. • Some flexibility should be built into this policy so as not to preclude hotel development in other viable and suitable locations. • However requirement for hotel sites to deliver 50% as residential accommodation may render a number of sites as unviable. • This is supported only for more higher value upmarket proposals encouraging higher spending visitors. • City of Edinburgh Council should be mindful that the impact of COVID-19 on Edinburgh's Tourism sector. There is no clear picture on the outlook for Edinburgh's tourism sector post CoVid19. The city has a far stronger international visitor profile than Scotland as a whole (44% v 23%), which in most circumstances would be considered a strength, but is now a real challenge as this 	<p>either completed or come up for planning permission.</p> <ul style="list-style-type: none"> • Supporting unabated hotel provision in local, town and commercial centres without an evidence base of the demand runs the risk of undermining the provision of suitable sites for conversion or new housing under Choice 12A. • Before Covid-19 this was an important area of jobs, investment and economic growth for the city. it is too early to say if there will be long term changes to the growth of the tourist market and the plan should be flexible to adapt to any change in expected hotel demand. • Hotels are a key economic driver for the City and the most appropriate location is the City Centre. Whilst the above locations should also be encouraged, so should the City Centre. • An assessment is needed of how many hotels of different types Edinburgh requires. This is related to an assessment of the capacity of Edinburgh to continue to accept tourism growth. New hotel construction, often on brownfield sites, prevents the use of such sites for housing. • To protect the viability of the city's existing hotel stock and the jobs of those that they employ there should be a moratorium on all future hotel development for the foreseeable future. • Residents first, visitors second. 	

15E We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh.

Total responses - 631

Agree 58% (364)	Disagree 42% (267)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>market is likely to be far slower to recover, so demand levels are likely to be substantially down on 2019 levels for years to come.</p> <ul style="list-style-type: none"> • As long as any building goes hand in hand with housing as outlined in other parts of the report. • Hotel development should be allowable anywhere in the city centre. • Ocean Terminal could support new hotel and tourist accommodation provision including short-stay apartments. Hotel provision at Granton would help bring about proposed tram line. • We agree with supporting hotel and purpose-built serviced self-catering accommodation where it frees up housing which is currently used for short term lets and enables this to be returned to long term residential use. • Additional hotel rooms though should be subject to rigorous challenge in the current environment so that the best use is made of any development space. • Portobello has no hotel, ideal area for one. • Yes if it stops holiday lets then more hotels are fine. • Need to be selective, and not more of the same. Lack of conference accommodation and self-catering, but not air BnBs. 	<ul style="list-style-type: none"> • There was signs of decline before Covid 19. Therefore to protect the viability of the city's existing hotel stock and the jobs of those that they employ there should be a moratorium on all future hotel development for the foreseeable future. We believe that this position also strongly fits with the new CEC approved and EHA endorsed Edinburgh 2030 Tourism Strategy and the stated desire to manage future tourism growth and achieve an effective balance between the needs of the city's resident, businesses and visitors. • Hotels must be carefully sited, and should be careful control over how many new provisions are allowed in each area over short times, and all kinds of accommodation must be included, not just traditional hotels. Should be careful assessment of whether new such development is appropriate. • Must look at all kinds of short stay accommodation together. • In the face of the climate emergency should be discouraging more travelling, tourism and associated hotels. • Homes should be prioritised over hotels and air Bed and Breakfast. 	

16A - We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Total responses – 507

Agree 89% (449)	Disagree 11% (58)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Consideration could be given to health or social needs being used in commercial sites; rehabilitation, GP, health checks, community services etc. • Meeting demand for alternative uses such as increased leisure provision maintains vibrancy and attractiveness of local centres. • We agree that flexibility in approach will help to address the changing nature of retail and leisure uses and adapt to the way we now live in the city. • Inevitable given changes in retail trends and post-Covid considerations. • This could bring more mixed use/evening activity. • With falling demand for retail floor space and a national over provision this policy seems appropriate and essential. • The demand for retail space has dropped in general, with a move towards consolidation in prime retail centres and locations. This means a lack of demand for many previous retail stores which now need a new purpose. If a change of use can be successfully promoted, this will retain footfalls and activity in the city. • The irreversible trend is ‘big’ retail being killed off by the internet, and for smaller specialised retail to 	<ul style="list-style-type: none"> • I think there should be large-scale shopping opportunities in cities that don't require having a car to travel to out-of-town commercial centres. • Wouldn't want to see wholesale takeover by leisure forcing closure of remaining shops. • Some of Edinburgh's traditional shopping centres or "high streets" are in a relatively healthy condition. But many show the tell-tale signs of the ongoing decline which has affected many high street and local shops across the UK in recent years. There is no room for complacency. • Some traditional shopping streets, such as Princes Street, are likely to change their character quite radically in short term due to new developments such as the St James Centre. And there is a gradually loss of character in in many local shopping streets as major chains and charity shops become more dominant. • We believe that healthy retail provision within the existing town centres is an essential part of the life of local communities, particularly for residents with less access to transport. • Retailer rely on other retailers to provide footfall. • Not sure how that could be achieved when we are trying to reinvigorate our centres. 	<ul style="list-style-type: none"> • Increased leisure facilities in the outskirts could be welcome.

16A - We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Total responses – 507

Agree 89% (449)	Disagree 11% (58)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>adapt and develop. Similarly with hospitality, big chains are struggling. All this was happening before Covid-19 which has rapidly accelerated the change.</p> <ul style="list-style-type: none"> • Commercial Centres should be permitted to accommodate any growing demand for retail and leisure floorspace. • The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre. • New residential development, either as redevelopment or conversion, should be supported when it can be demonstrated that the increase in resident population or the decrease in vacancy would improve the centre. The seven existing Commercial Centres in Edinburgh play an important role within the defined hierarchy of centres. They are spatially dispersed across the City area and are as 'local' and easily accessed for many consumers as the sequentially preferable town centres or local centres. • In particular for Princes Street more mixed uses will provide incentives to bring locals into the centre. • Not enough youth or non-cinema entertainment areas in the centre. • Libraries should act as community hubs. 	<ul style="list-style-type: none"> • This should be related to an assessment of the capacity of Edinburgh to continue to accept tourism growth. • You should not disrupt the natural demand vs supply approach. The use of space naturally develops based on demand. • The current policy of restricting uses within existing centres can lead to units being unoccupied, affecting the health and vitality and viability of the centre. New development, either as redevelopment or conversion, should be supported when it can be demonstrated that the decrease in vacancy would improve the centre. • Too prescriptive. • Leisure provision is wholly appropriate within Commercial Centres, complementing the existing retail offer and improving the attractiveness of a centre to consumers. • Market interest for leisure uses at Commercial Centres is clear and additional flexibility to accommodate such uses on sites such as Meadowbank Retail Park is welcome and positive. • Town centres should protect usable retail floorspace. • Alternative uses not just leisure. 	

16A - We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand.

Total responses – 507

Agree 89% (449)	Disagree 11% (58)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Reduced demand on the city centre is important for the future of the city. Need to entice locals to come to the centre for activities other than retail. Yes if reused for housing or hotel use. There must be a finite amount of retail space the population can support. 	<ul style="list-style-type: none"> Shopping centres should focus on retail, city centres on leisure and entertainment. Not clear what type of leisure development. 	

16B We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres.

Total responses - 485

Agree 90% (435)	Disagree 10% (50)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • What support will there be? Active, or passive, by not objecting to new proposals? Impact of Covid-19? • Providing that there is an allowance to repurpose the space in the event that it is clear and demonstrable that there is no demand for office accommodation as proposed. • Policy should support office use in Commercial Centres in light of the accessibility of this space and changes in retail trends which may mean more vacant retail space in commercial centres which could be adapted to accommodate alternative uses and to increase the vibrancy of the Centre. • In addition, City Plan 2030 should recognise the growth of home-working (full-time and occasional) encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes. • Commercial centre adjacent to office space provides the possibility of nearby leisure and refreshment activities for office workers and the ability to use spare time and lunch breaks to make purchases. It also provides a ready supply of potential clients nearby to the commercial development. 	<ul style="list-style-type: none"> • We doubt if the demand will be there, except as part of the new pattern of working. • Less need after Covid-19. • Lots of office space sitting empty. Should reuse and recycle. • Will add to congestion and pollution. 	<ul style="list-style-type: none"> • A policy that supports and encourages rather than requires office development to be in commercial centres would be preferable. • Question how this may work in practice and consider that there may not be strong occupier demand in these locations.

16B We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres.

Total responses - 485

Agree 90% (435)	Disagree 10% (50)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • No objection to this as long as any development is supported by appropriate transport infrastructure. If it is to be located on the west side of Edinburgh, consideration must be given to cross boundary travel in consultation with partner authorities. • The policy is necessary to meet demand when there is limited scope for development of strategic office centres within the central area. • We agree but only where there is a clear economic case. Otherwise the office could become a liability if it remained unoccupied. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. • Include provision of green space for mental health benefits. • Small local offices should be encouraged to reduce travel to centralised offices at time of climate change. 		

16C We want to support office development at commercial centres as these also provide accessible locations.

Total responses – 479

Agree 78% (372)	Disagree 22% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> Concerns with placing too much emphasis on locations at Edinburgh Park/ South Gyle, the International Business Gateway and Leith to deliver substantial new levels of office floor space. These peripheral locations do not have the same level of occupier demand as the city centre. The Plan should acknowledge that these locations are preferred locations for office use in the City and that mixed-use development (commercial, leisure, housing, hotels) in these locations would be appropriate to complement. Failure to do more than simply ‘support’ office development in these locations, rather than resist it elsewhere, will dilute the delivery across the city and undermine the success of the policy. As a consequence, for part A to succeed in meeting its objectives, parts B, C and D are unnecessary and should not be pursued as part of the LDP. The changing work practices enforced through Covid-19 restrictions are likely to have long term structural implications. Therefore recommend that City of Edinburgh Council review the office supply and demand assessment before finalising their proposed office policy. 	<ul style="list-style-type: none"> There are already discussions going on in the commercial property sector about companies reducing office space to save costs now Covid-19 has shown them how easy it is to operate with staff working remotely. This will radically change availability of office space and most likely reduce demand considerably. This proposed preferred choice of promoting office use suggests a restriction of other uses at South Gyle when elsewhere in the plan (choice 2, map 2) it is suggested that the area could accommodate high density residential use. The proposed choice appears to go against the overarching principles and policies of the plan which seek to encourage all forms of development in the most accessible locations. Too much empty office space already. Should be refurbished or changed to housing. Create policies to prevent office accommodation with short lifespans, which is not sustainable. Forcing people into areas puts a strain on transport infrastructure. Sites that rely on intensive car use for commuting should not be permitted. Infrastructure not good enough at the Gyle or Leith. 	<ul style="list-style-type: none"> This should not preclude the opportunity to introduce a greater mix of uses in these areas. Leith Docks is identified as a potential location for new business and industry. We are aware that it is currently an industrialised area, nevertheless because it is in the broad vicinity of Imperial Dock Lock, Leith Special Protection Area any potential impacts must be properly assessed and the forthcoming LDP ensure that this site is safeguarded.

16C We want to support office development at commercial centres as these also provide accessible locations.

Total responses – 479

Agree 78% (372)	Disagree 22% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Any proposals for additional office space within or outside of the strategic locations should be subject to critical assessment of likely demand. • However, as Edinburgh is the regional core for south east Scotland it is essential that CEC engages in a regional collaborative approach to strategic office space provision so neighbouring partner authorities are not negatively impacted. • Yes, in principle. We note the statements about the significant demand for office space in Edinburgh, but we are aware of a number of instances, where recently constructed office buildings have remained empty for several years before occupation. What are the reasons for this and can these be mitigated? Could empty office buildings have a temporary use for accommodation? • The market fundamentals for new office development are strong, with high take-up of available space and rental values around £35 per square foot. These rental values are among the highest in the UK outside of London and the south east of England. 	<ul style="list-style-type: none"> • City centre should be for residents, tourists and light commerce. Offices should be outwith the centre. • Need this space to be used for social housing. • Lack of infrastructure and facilities at the Gyle. • Encourage companies to reduce their need for offices and work remotely. • Need sufficient parking or reliable transport links from park and ride sites. • Concentrate office space in commercial areas rather than the city centres. • Should be mixed uses not just offices (dead spaces in the evenings). • Live and work local, no more mass population movement. • International Business Gateway represents a hollowing out of the inner city. 	

16D We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments.

Total responses – 403

Agree 65% (260)	Disagree 35% (143)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • There are already discussions going on in the commercial property sector about companies reducing office space to save costs now Covid19 has shown them how easy it is to operate with staff working remotely. This will radically change availability of office space and most likely reduce demand considerably. • Locating space in the city centre would make use of existing good public transport links and would benefit from any proposed new/improved infrastructure. • We agree and the loss of suitable office development sites has been a concern in the city. Any requirement should only be demanded where a development scheme suggests a clear opportunity for the use of the office space. • The policy is necessary to meet demand when there is limited availability of sites for 100% commercial development. • Reservations about the use of the term “significant”. Edinburgh is unique in having a strongly residential city centre and benefits from residents keeping the city centre. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. The level provided should be 	<ul style="list-style-type: none"> • The Choices document does not explain how "significant" the requirement for office floor space should be. The Council is also promoting at the same time a brownfield housing development strategy. Is the requirement for "significant" office space consistent with this? The Council will also require to demonstrate in preparing any future policy that the requirement for "significant" office space will not have an adverse impact on development viability. • This could be supported, but only in areas with demonstrable demand and appropriate social and transport infrastructure to support it. It is important to note that the impact of Covid-19 is not yet clear but there could be implications for the office sector. • So far mixed use development has meant offices, hotels, retail, bars and entertainment and no housing. This is not mixed use development and we would not support yet more offices. • Let the market decide, within the limits of an overall plan. • Large offices do not need to be located in city centres. Their presence will increase the need for commuting and create empty spaces once they close at the end of the working day. There will need to be some offices to provide services and employment for people living in the city centre 	<ul style="list-style-type: none"> • This can be encouraged but should not be a requirement if it would preclude very good developments that did not include office space from coming forward. • Delivery of office uses within mixed use development will be dependent on market forces and should not be forced upon developers of those sites.

16D We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments.

Total responses – 403

Agree 65% (260)	Disagree 35% (143)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>tailored to the specifics of each site, rather than a one-size-fits-all approach.</p> <ul style="list-style-type: none"> • For the vitality of the City, employment should be encouraged to return to the City Centre. It has been the replacement of offices by hotel development that has been a major factor in the decline of viable retail outlets. • If there is demand and need for this. • But do not lose sight of the beauty of the centre of the city and end up with too many offices and the centre becoming dead at night. • Need affordable office space for start ups. 	<p>but the use of the word significant is not appropriate.</p> <ul style="list-style-type: none"> • Not sure we want a policy that always prioritises office floorspace over other uses, e.g. hotel/residential/shopping/leisure. It is possible to deliver all of these functions within the same building? • Some locations within the city centre will be more suitable to office development than others. Request that any future mixed use planning submissions are considered on their own merits, rather than the Council enforcing a 'blanket policy' requiring a certain percentage of any mixed use development for office floorspace. • Need this space for social housing. • Should favour out of city centre office locations. • Better used for leisure, retail or housing. • Too much of a heritage impact. • There is enough office space already. • Increases travel to the city centre and detracts from local communities. • Needs Covid-19 rethink. • Let the market decide. 	

16E We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent.

Total responses - 403

Agree 65% (260)	Disagree 35% (143)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Reduced need for office space will allow more housing development so reduce the office space to housing ratio. • The important issue is to secure the successful and sustainable regeneration of the area. It is important therefore to remove unnecessary planning obstacles that impede the development of residential properties in the area. • An area of Leith (around Victoria Quay) has been designated as a strategic office location on maps 21 and 22. We note that much of this land comprises former commercial units which have been converted into residential flats (particularly at upper levels). We would therefore suggest that this area is widened and allocated for a mix of uses so that offices can come forward alongside residential. It will be important for the emerging local development plan to ensure that policy is in place to protect existing employment uses in Leith and encourage office development as part of any residential development. • Agree in principle however support more mixed use sustainable communities rather than purely office or single use. 	<ul style="list-style-type: none"> • What is the priority - offices or homes? • I'm in favour of residential development that includes alternative ground and basement floor uses e.g. commercial, business, retail, etc. This could also include nursery provision, GP surgeries, etc. • It is unclear which areas have residential development consent. As detailed our preference is to improve office, light industrial and manufacturing provision with the area. • As worded, this is contrary to multi-use development policies. • We have a high demand for housing in Leith. Mixed use housing with small scale business, retail, creative industry start-up space, is in keeping with the area's heritage. • Land shortage of housing already being experienced in Edinburgh. If followed through - a site of commensurate scale must be identified. • Mixed use is good and in Leith it works. 	<ul style="list-style-type: none"> • This should be done in consultation with the landowners. • Leith Strategic Office Location could be extended to include Ocean Terminal to reflect potential for this site to be redeveloped to provide office space alongside other mixed-uses including retail, food and drink, leisure, tourist accommodation and facilities.

16E We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent.

Total responses - 403

- Areas with residential potential are also recognised on existing sites where there is potential for intensification of use and redevelopment whilst protecting existing office floorspace.
- Leith office initiative never took off due to location and poor transport links.
- As long as housing sites meet local needs.

16F We want to continue to support office development in other accessible locations elsewhere in the urban area.

Total responses - 475

Agree 83% (392)	Disagree 17% (83)	Comments / other issues raised
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • If someone wants to develop an office there shouldn't be any in principle objection. • Support the idea of office development in the New Town area particularly focused on addressing the needs of residents. There is an increasing trend towards work portfolio careers and working from home (which has been accentuated by the Covid-19 pandemic) and we would support the development of office space on a short term lease basis and for small companies and single individuals as a way to encourage entrepreneurship within Edinburgh. • We advocate the creation of mixed use neighbourhoods. • Office use within the strategic centres is supported but the emerging development plan needs to accept that the loss of office use to alternative uses can be beneficial. As the requirements for offices change over time, a policy which requires their retention will not necessarily retain employment – which should be the aim of policy. • It is necessary to support the market demand for mid to smaller offices. The travel demands help to justify the cost of transport links to urban areas. 		<ul style="list-style-type: none"> • We do not support office development in other accessible locations elsewhere in the urban area. • Impact of Covid-19 changing demand and availability of office space. • Should let market control this. • Concentrate on housing in these areas. • We have enough off space, with new developments sitting empty. • Need to extend urban areas too. • Too vague. • Buildings use of offices and residential are not compatible. • Redevelopment opportunities should be used for housing not offices. • Transport routes are radial, should concentrate it in the city centre. • Facilitate working from home.

16G We want to identify sites and locations within Edinburgh with potential for office development.

Total responses - 467

Agree 77% (360)	Disagree 23% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Agree. These should be served by public transport to enable sustainable commuting. • Support but request that any future designations are 'market informed' based on current requirements and demand. • Encourage dialogue with neighbouring local authorities to understand where business location or co-location could increase inclusive growth without detriment to the business itself. It should also take account of new working practices resulting from Covid-19. • Office development should be a key part of the plan, including potentially safeguarding some core parts of the wider city for the promotion of offices. However, as a ten year plan the city may need to amend proposals in the light of market experience and appetite. • Gilmerton Gateway should be identified as such a site. • ONLY if a) this is on direct public transport lines and doesn't require additional parking provision b) the offices are part of mixed-used • Bedford Barracks site for mixed use. • Should be brownfield site and limit amount of car parking in them, with significant public transport provision. • Be sensitive to specific areas, tend to be multi level and will not be suitable for most sites. 	<ul style="list-style-type: none"> • This should really be demand led. If there is a city centre zone and regional hotspots where office use is supported, it should not need to be supplemented. The majority of office occupiers will gravitate towards the established markets in areas with the appropriate infrastructure. • We wish to encourage more mixed use development. • Surely that is for property developers to do. • Impact of Covid-19 will radically change demand for office space. • Too many offices already many are vacant. • Just heightens housing provision shortfall. • Greater use of home working and video conferences. • Seems contrary to reducing traffic levels. • Public transport is on radial routes so should focus on city centre for offices and outlying areas for housing. 	<ul style="list-style-type: none"> •

16G We want to identify sites and locations within Edinburgh with potential for office development.

Total responses - 467

Agree 77% (360)	Disagree 23% (107)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Within city not outskirts. • Not at the expense of housing developments. • Should be joined up at regional level with other councils. • Only where land is unsuitable for other uses and unoccupied for some time. • Not clear how you are going to assess sites and existing provision and empty units. Occupation should be prioritised 		

16H We want to introduce a loss of office policy to retain accessible office accommodation. Or we could introduce a ‘loss of office’ policy only in the city centre.

Total responses - 450

City Wide 43% (193)	City Centre 25% (112)	No change 32% (145)
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Edinburgh city centre has been unsustainably weighted to tourist and commercial development in recent years, and in order to maintain a mix of local employment opportunities we would encourage the maintenance of existing office space. • This might change as a result of Covid-19. • There is a need and market demand for office space at locations other than the city centre. 	<ul style="list-style-type: none"> • I support a loss of office policy in the city centre and suggest the loss of office policy should just apply in the city centre. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and where they are readily served by transport infrastructure. The level to be provided or retained should be tailored to the specifics of each site, rather than a one-size-fits-all approach. • This is excessive. Developing sites at increased density in central areas will be challenging given 	

16H We want to introduce a loss of office policy to retain accessible office accommodation. Or we could introduce a 'loss of office' policy only in the city centre.

Total responses - 450

City Wide 43% (193)	City Centre 25% (112)	No change 32% (145)
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Support in the context set out with existing office space provided as part of denser development. • A 'loss of office policy' only in the city centre would disadvantage areas like Leith capable of accommodating employment uses as part of an accessible mixed community. • Supports a loss of office policy city-wide to ensure the retention of existing office space throughout the city in a variety of accessible locations. • Support a loss of office policy city-wide, and welcome the mix of small-scale office and commercial, cultural, and residential space which gives Leith its unique character. However concerns that extending a broad-brush 'loss of office policy' to Leith could reduce the opportunities for providing affordable housing on brown-field sites which currently have office use, or for amending an existing planning consent to convert office space to residential. • However, needs to be analysis of existing offices and occupancy. • Financial sector is well established and this must continue. • Policy should allow flexibility if there is no demand. 	<p>heritage constraints. It would be more reasonable to allow change of use if it could be demonstrated that the existing use was no longer marketable.</p> <ul style="list-style-type: none"> • Covid-19, an issue which is likely to change the requirements for foreseeable future. It may be the case that in future more homeworking is encouraged by employees, leading to less traditional office space being required. In such changing times the policies should remain as flexible as possible. • Risk of properties remain vacant instead of being redeveloped. • If policy is required, there should be an exception for offices that are no longer fit for purpose and that these can be redeveloped as the market demands. • There should also be a recognition that the physical constraints of listed buildings in the city centre may not be capable of meet modern office requirements on a financially viable basis and existing offices may not currently be located in the most accessible locations. • Request that any new policy contains a provision which allows small-scale changes of use. • For the vitality of the City, employment should be encouraged to return to the City Centre. It has been the replacement of offices by hotel 	

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Total responses - 450

City Wide 43% (193)	City Centre 25% (112)	No change 32% (145)
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Needs to be in supplementary guidance rather than the plan. • City centre has the greatest need for office space. Further outside the city space exists and a lot is vacant. • Converting offices to residential results in substandard accommodation. 	<p>development that has been a major factor in the decline of viable retail outlets.</p> <ul style="list-style-type: none"> • Need people to live in the inner city. • Leave it to market forces. • There is enough office space and lack of residential property. • Should facilitate working from home. • Conflict between policies promoting mixed use and policies promoting separate uses. • Redevelop not required office space for housing. 	

16.2A We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations; Leith Docks, Newbridge, Newcraighall, Edinburgh Airport Crosswinds.

Agree	Disagree	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223</p>	<p>Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121</p>	
<ul style="list-style-type: none"> • It would be helpful to have these areas close to existing housing so that people do not have to travel so far to work. • There are opportunities to improve blue green infrastructure at all of these sites, perhaps some more than others. Although they will be complex to develop and require partnership approaches to deliver but will be worth the effort because they will result in multi-benefit, enhanced natural capital, sustainable, resilient places. • Premature to identify Crosswinds and Newbridge in advance of conclusion of the West Edinburgh Spatial Strategy, the findings of which should inform the LDP. • There is an urgent need for modern business space, including industrial and logistical space, to support distribution and other business services at a local level. • Many of these industrial estates will be close to the end of their building cycle life in the near future. Also many of these industrial estates are 	<ul style="list-style-type: none"> • Newcraighall is already massively overdeveloped. The Traffic infrastructure is bursting at the seams already. • We do not support Newbridge and Newcraighall as more sites in these areas could further erode green lands and prime agricultural land. Also the landscape quality of existing development is poor. • Insufficient public transport at Newbridge. • Newbridge is out of town and bad traffic congestion. • Traffic volumes near Crosswinds bad already. • Newcraighall is gridlocked due to the available roads and the congested retail park next door. The last thing needed at Newcraighall is more development. • Leith bad for transport links. • Industry should be kept away from residential areas. • Newbridge and Newcraighall need better transport links. • Cannot envisage much demand for industrial floorspace in a strategic business area (Leith). 	<ul style="list-style-type: none"> •

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223</p>	<p>Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121</p>	
<p>in areas which are now predominantly residential use in nature. However, important that the stock of industrial accommodation is maintained as in many instances industrial units are the cheapest business accommodation available. Therefore, it is critical to ensure that there is adequate industrial development land supply available. The new industrial development land supply must be in a well located area near to major transport links and have the correct infrastructure available.</p> <ul style="list-style-type: none"> • Crosswinds: The A listed building has already seen enabling development in its immediate vicinity. We would expect the listed building to be fully taken account of in any planning and layout of the new site. • The Crosswind site offers unique connectivity with its proximity to the Airport and the tram and rail links at the Gateway station offering easy links to other parts of Edinburgh and the wider Scottish network. • Seems sensible, provided the policy is flexible rather than rigid. 	<ul style="list-style-type: none"> • Impacts of Covid-19 on requirements. • Newbridge - traffic implications of the Newbridge Roundabout must be considered and access to the motorway system needs to be improved • There is always empty warehousing on the various Newbridge Industrial Estates so why build more. 	

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Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223</p>	<p>Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121</p>	
<ul style="list-style-type: none"> • Only support the 'Crosswinds' site if there are adequate improvements in roads capacity. • Leith Strategic Business Centre is sufficiently close to be included in an early phase of a district heating scheme centred on an ERF at EW 1d Seafield. As is shown by examples in Sheffield. Nottingham, and throughout northern Europe (eg Gothenburg), the other locations could also be connected if the network was expanded to the full available energy potential of an Energy Recovery Facility at Seafield. Leith Strategic Business Centre might also be supplied directly by a private wire electricity connection. In supporting business and industrial locations as set out in Choices we do not support mixed use development on EW 1d. It is suitable for business or industrial development as per existing Emp 8 and for an Energy Recovery Facility as per RS 3. • Provided transport links are good for visitors. • We need jobs and employment here, to foster data start up to create new jobs and value from this city. It has become weak from tourism, 		

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Agree	Disagree	
Leith: 310 Newbridge:282 Newcraighall: 305 Crosswinds: 223	Leith: 57 Newbridge: 67 Newcraighall: 39 Crosswinds: 121	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>which does not provide high quality (exportable) jobs skills or services.</p> <ul style="list-style-type: none"> As older sites are often used to create new housing care must be taken to protect inhabitants of the area from any substance or noise pollution relating to proposed new development. People living nearby any business/industrial site are reliant on the council to ensure this aspect of their health and well-being. Should support active travel. Need to use up existing sites first. Makes sense for industrial sites to be out of town. Hubs with mixed office and other use development sound good. Leith, potential to create and enhance an existing vibrant community by allowing residential , commercial and office space to be created is an opportunity to demonstrate what a sustainable development for the future should be. Leith Docks is within the vicinity of a Special Protection Area and potential impacts need properly assessed. 		

16.2B - We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites.

Total responses – 439

Agree 77% (340)	Disagree 23% (99)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • A much clearer definition of the criteria and requirements is needed . • This could be supported, providing that there is an allowance to repurpose the space in the event that it is clear and demonstrable that there is no demand for office accommodation as proposed. • Support the provision of office space as a key ingredient of mixed use neighbourhoods and welcome clear guidance based on best practice approaches. • Providing it is not imposed as a requirement on all urban sites. Many urban sites are not appropriate for business use, or a mix of uses and the appropriateness must be dependent upon the context to the site. • It is important to ensure that business space is linked to public transport network to enable sustainable commuting. • City Plan 2030 should recognise the growth of home-working (full-time and occasional). • Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces. • We need more space for new business both in the city and in new greenfield releases to create more sustainable communities. 	<ul style="list-style-type: none"> • It is not always practical, viable, desirable or marketable to provide for business space in greenfield locations. A criteria-based policy may be helpful if proceeding. • 1. We do not believe that providing a token amount of business space on a brownfield housing/mixed use site is viable and should not be adopted. 2. New business space on greenfield sites of scale should be promoted. • Market -led approach to business space in the greenfield locations should be taken and it should not be a requirement of place briefs. • Such an approach requires a critical understanding of the demand for business space in particular locations. This raises a further question over the Council's proposed approach to Place Briefs, which appears to exclude any consultation with developers and landowners. The proposed approach is very prescriptive, not only specifying particular use and scale but location within a site. • There will need to be a very clear justification for the displacement of viable businesses to make way for new housing development. It must be made clear why the development of business space on greenfield sites to accommodate businesses displaced from urban sites is a better 	<ul style="list-style-type: none"> • It should be ensured that site identification is subject to robust environmental assessment of site proposals (both individually and cumulatively). If the preferred choice is brought forward to the Proposed Plan, we would expect to see greater detail. • There is merit in identifying suitable sites for office development, however, there needs to be a flexible approach. There should be a general presumption in favour of office development in urban locations which are well-served by good public transport links and which meet locational requirements for businesses. • Should recognise the growth of home-working (full-time and occasional) encouraged by the digital economy and advances in digital communications, and to provide workspaces within walking/cycling distance from homes. Major developments should include a proportion of homes with integral workspaces and provision of small business workspaces.

16.2B - We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites.

Total responses – 439

Agree 77% (340)	Disagree 23% (99)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • However, we do not support a blunt approach to requiring new business space that will not be successfully occupied and traded from. 	<p>option than leaving existing businesses where they are and instead developing housing on the greenfield sites.</p>	

16.2C - We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8).

Total responses - 423

Agree 87% (369)	Disagree 13% (54)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • A continued mix of employment in the locality as offered by industrial estates is essential for bringing a diversity of roles and people into our community. Further, welcome the provision of industrial space that could cater for high-end businesses that could be an essential part of an entrepreneurial plan for our city. • Should the Council still seek to pursue this policy, we would request that they include criteria to allow greater flexibility to be applied, assessing redevelopment schemes on a case by case basis. • However the Emp 8 schedule of sites is restrictive and will not allow for sufficient re-provisioning of business space across the city. The range and choice of sites needs to be extended on a city-wide basis. 	<ul style="list-style-type: none"> • This needs to be assessed strategically in conjunction with delivery of housing on brownfield sites and the realisation of connected mixed use neighbourhoods. For example, industrial estates are typically not particularly densely utilised and often form a barrier between adjacent areas. In some case, particularly urban locations, these sites could be better suited to denser mixed use. • Provided a development is delivering jobs and employment it should be acceptable on employment sites, not solely Use classes 4, 5 & 6. • This protection should not be continued for older industrial estates that are at the end of their building cycle life and could provide much needed brownfield development sites, as long as this is coupled with a much needed land supply 	

16.2C - We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8).

Total responses - 423

Agree 87% (369)	Disagree 13% (54)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • But a lot of them are vacant, because they are too expensive for small or new ventures. • Need to protect light industrial and manufacturing provision in Leith. • There is a significant lack of supply of industrial property in the Edinburgh area and it will be important to safeguard even some older stock in order to support supply in the region. • Important to keep in mind industrial sites close to but outside the city boundary. These provide employment for many city residents and impact on city travel and housing. • Important to protect the existing industrial estates but think redevelopment proposals can be permitted when the loss of floorspace can be replaced elsewhere. • The plan should continue to safeguard land at Seafield (Site EW 1d) for a waste management facility incorporating thermal treatment with energy recovery. 	<p>of new industrial development sites with proximity to transport links and infrastructure.</p> <ul style="list-style-type: none"> • A flexible approach should be adopted - there is no point in protecting areas where no hope of the policy designation will ever be realized. • Industrial estates tend to be one-storey buildings, and become 'no-go' areas at night which are dark, unwelcoming, and create the risk of attracting anti-social behaviour. Buildings which contain a mix of uses and are active on a 24-hour basis are what is needed in a 21st century city. 	

16.2D We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs.

Total responses – 452

Agree 92% (414)	Disagree 8% (38)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<ul style="list-style-type: none"> • Considerable work is needed to develop a policy to deliver a city-wide freight strategy of interconnected neighbourhood goods distribution hubs that integrate with the aims of the City Mobility Plan and the restriction proposed as part of the Low Emission Zone proposals. • While these distribution hubs could mitigate against the number of delivery vehicles entering the city, this could be offset by the volume of private car trips generated by people collecting from distribution centres. Distribution centres would have to be located where there is ease of access by public transport. Possibly park and ride sites could incorporate goods distribution hubs. • If this prioritises green transportation solutions, e.g. cargo bikes and electric vans. • The Covid-19 crisis has shone a light on the need for strong logistical networks including local facilities. • However, it is not reasonable to allow goods distribution hubs to be built, developed and utilised in areas where the impacts would be detrimental to residents or infrastructure of the city. • This is CRITICAL. The City, especially the Centre and most especially the Old Town is severely 	<ul style="list-style-type: none"> • Plan should be flexible to be able to accommodate such proposed without "sterilizing" any particular pocket of land in the hope that that particular land use will be realized. • Further work need to be done to identify where these will be and consultation carried out ahead of the proposed plan. • More information is needed before a view could be properly formed. 	

16.2D We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs.

Total responses – 452

Agree 92% (414)	Disagree 8% (38)	
Reasons for agreeing	Reasons for disagreeing	Comments / other issues raised
<p>negatively impacted by ridiculously oversized and inappropriate delivery and other service vehicles.</p> <ul style="list-style-type: none"> • We certainly see a great need for more locations around Leith for goods distribution hubs. Leith used to have lots of railway land and many large 'goods yards', but much of this land has now been lost to housing. The eastern edge of the docks, Seafield end, would be well suited for this. Therefore it should not be swallowed up by new building of houses, office /business units. • Waste disposal will also need to be coordinated to avoid the pressures of numerous vehicles from different private companies contracted by different businesses. • Such hubs are a good idea, but there's a danger of over-prescriptiveness and a less than optimal use of finite planning resources. 		