

**Customer Ref:**       **Response Ref:**

**Name**

**Response Type**

**On behalf of:**

**Supporting Info**

**Email**

**Choice**      **1 A**

**We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this? - Select support / don't support**

**Short Response**

**Explanation**

**Choice**      **1 B**

**We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object**

**Short Response**

**Explanation**

Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice **1 C**

**We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **1 D**

**We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **1 E**

**We want to introduce a new 'extra-large green space standard' which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 1 F

**We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice 1 F

**We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)**

Short Response

Explanation

Choice 1 G

**We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **1 H**

**We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this? - Yes/No**

Short Response

Explanation

Choice **2 A**

**We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **2 B**

**We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this? - Yes / No**

Short Response

**Explanation** Choice 2 proposes a revision to the Council's density policies to make best use of the limited space in our city and to ensure that sites are not under-developed. On behalf of ASI we support this proposed change. Brownfield sites such as Glenogle Road developed to an appropriate density can contribute to the sustainable development of the city, reducing the need for greenfield sites to be released. Initial development options for the site demonstrate that the site could be developed for a residential scheme of approximately 100 units, and would represent the efficient use of the site

Choice **2 C**

**We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this? - Yes / No**

Short Response

**Explanation**

Choice **2 D**

**We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this? - Yes / No**

Short Response

**Explanation**

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **3 A**

**We want all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. Instead we could require new development to meet the bronze, silver or gold standard. Which standard should new development in Edinburgh meet? - Which standard?**

Short Response

Explanation

Choice **4 A**

**We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **4 B**

**We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. - How should the Council work with local communities to prepare Local Place Plans?**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **5 A**

**We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **5 B**

**We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this? - Yes / NO**

Short Response

Explanation

Choice **5 C**

**We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **5 D1**

**We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **5 D2**

**We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **5 E**

**We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this? - Yes / No**

Short Response

Explanation



Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **6 A**

**We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **6 B**

**We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **7 A**

**We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **7 B**

**We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **7 C**

**We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **7 D**

**We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **8 A**

**We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **8 B**

**As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **8 C**

**We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **8 C**

**We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Upload new cycle routes**

Short Response

Explanation

Choice **9 A**

**We want to consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice **9 B**

**We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **10 A**

**We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **10 B**

**We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **10 C**

**We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **11 A**

**We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice **11 B**

**We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **12 A**

**Which option do you support? - Option 1/2/3**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 B1**

**Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Calderwood**

Short Response

Explanation

Choice **12 B2**

**Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Kirkliston**

Short Response

Explanation

Choice **12 B3**

**Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - West Edinburgh**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 B4**

**Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - East of Riccarton**

Short Response

Explanation

Choice **12 B5**

**Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - South East Edinburgh**

Short Response

Explanation

Choice **12 B6**

**Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Calderwood**

Short Response

Explanation



Customer Ref: 00030 Response Ref: ANON-KU2U-GPRZ-A

Supporting Info

Name Avison Young (UK) Limited

Email michael.nelson@avisonyoung.com

Response Type Agent / Consultant

On behalf of: Aberdeen Standard Investments

Choice 12 B7

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Kirkliston

Short Response Not Answered

Explanation

Choice 12 B8

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - West Edinburgh

Short Response Not Answered

Explanation

Choice 12 B9

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - East of Riccarton

Short Response Not Answered

Explanation

Customer Ref:

00030

Response Ref:

ANON-KU2U-GPRZ-A

Supporting Info

Name

Avison Young (UK) Limited

Email

michael.nelson@avisonyoung.com

Response Type

Agent / Consultant

On behalf of:

Aberdeen Standard Investments

Choice 12 B10

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - South East Edinburgh

Short Response

Not Answered

Explanation

Choice 12 BX

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Explain why

Short Response

Not Answered

Explanation

Choice 12 C

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response

No

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 12 C

**Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload**

Short Response

Explanation

Choice 12 C

**Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload**

Short Response

Explanation

Choice 12 D

**Do you have a brownfield site you wish us to consider in the proposed Plan? - Brownfield sites upload**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **13 A**

**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. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice **14 A**

**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. Do you support this approach? - Yes / No**

Short Response

Explanation

Choice **14 B**

**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. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice 14 C

**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. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice 15 A

**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. Do you agree with this? - Yes / No**

Short Response

Explanation

Choice 15 B

**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. Do you agree? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 C

**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. Do you agree? - Yes / No**

Short Response

Explanation

Choice 15 D

**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. Which approach do you support? - Yes / No**

Short Response

Explanation

Choice 15 E

**We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 G

**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. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice 16 A1

**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. Do you agree? - Yes / No**

Short Response

Explanation

Choice 16 A2

**We want to support office development at commercial centres as these also provide accessible locations. - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A3**

**We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree? - Yes / No**

Short Response

Explanation

Choice **16 A4**

**We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree? - Yes / No**

Short Response

Explanation

Choice **16 A5**

**We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Yes / No**

Short Response

Explanation



Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **16 A5**

**We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Do you have an office site you wish us to consider in the proposed Plan?**

Short Response

Explanation

Choice **16 B**

**We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this? - Yes/No**

Short Response

Explanation

Customer Ref: 00030      Response Ref: ANON-KU2U-GPRZ-A  
Name: Avison Young (UK) Limited  
Response Type: Agent / Consultant  
On behalf of: Aberdeen Standard Investments

Supporting Info:   
Email: michael.nelson@avisonyoung.com

Choice 16 C

**We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could introduce a 'loss of office' policy only in the city centre. - Yes / No**

Short Response:

**Explanation**

Choice 16 proposes a loss of office policy to retain accessible office accommodation, and would not allow the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. The policy is proposed to apply across the city. On behalf of ASI, we do not support the inclusion of this policy as currently worded. It is important that restrictive policies such as this incorporate sufficient flexibility to respond to the specific circumstances of individual sites. The blanket application of the policy across the city, rather than focused on the city centre, strategic office locations and other prime office locations unreasonably restricts redevelopment of unviable business locations to uses more appropriate to their context.

As noted earlier, the ASI building at Glenogle Road is currently operated as a data centre and includes only a modest level of office floorspace which is ancillary to the data centre function. It is also located in an area of the city within which there is only a limited demand for offices with achievable rents reflective of this. The building itself is configured primarily as a data centre, and would not be easily, or economically, converted to modern office space. Aberdeen Standard Investments are therefore looking at the longer term potential of the site. We suggest, therefore, that the policy should instead provide the opportunity to justify redevelopment of business floorspace for alternative uses, such as housing, in circumstances such as where existing buildings are not easily reconfigured to meet the needs of the modern office occupier, or where expert opinion is that demand for office floorspace in a particular location is too low to support the existing quantum.

Choice 16 E1

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Leith Strategic Business Centre**

Short Response:

**Explanation**

Customer Ref:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info   
Email

Choice 16 E2

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newbridge**

Short Response

Explanation

Choice 16 E3

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newcraighall Industrial Estate.**

Short Response

Explanation

Choice 16 E4

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - The Crosswinds Runway**

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E5

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Leith Strategic Business Centre**

Short Response

Explanation

Choice 16 E6

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newbridge**

Short Response

Explanation

Choice 16 E7

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newcraighall Industrial Estate.**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E8

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - The Crosswinds Runway**

Short Response

Explanation

Choice 16 EX

**We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Explain why**

Short Response

Explanation

Choice 16 F

**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. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree? - Yes / No**

Short Response

Explanation

Customer Ref:  Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 G**

**We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No**

Short Response

Explanation

Choice **16 H**

**We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree? - Yes / No**

Short Response

Explanation

30 April 2020

City Plan Team  
 City of Edinburgh Council  
 Waverley Court  
 4 East Market Street  
 EDINBURGH  
 EH8 8BG  
**By email: [cityplan2030@edinburgh.gov.uk](mailto:cityplan2030@edinburgh.gov.uk)**

Dear Sir/Madam

**CHOICES FOR CITY PLAN 2030  
 REPRESENTATIONS ON BEHALF OF ABERDEEN STANDARD INVESTMENTS**

These representations to “Choices for City Plan 2030” are prepared by Avison Young on behalf of Aberdeen Standard Investments (“ASI”) and relate specifically to land in ASI’s ownership at 8 Glenogle Road, Edinburgh.

The Glenogle site extends to approximately 0.65 hectares and is currently used by ASI as a data centre with limited ancillary office space and associated car parking. The existing building is highly bespoke, designed for an owner occupier in the specific current use.

The site occupies a key urban location in the Inverleith area of Edinburgh. It is bounded to the north by the Water of Leith, beyond which lies the Tanfield office complex. To the east lies Brandon Terrace comprising residential tenements with commercial uses at ground floor, while to the west is predominantly residential areas including the Glenogle Park Colonies further along Glenogle Road. To the south, the site is bounded by Glenogle Road itself with offices accessed off Brandon Street occupying an elevated position overlooking the site.

A site location plan is enclosed.

Although not identified individually, ASI’s site at Glenogle Road falls adjacent to the New Town site grouping (No. 17) in ‘Choices for City Plan 2030’ which scores highly against the Council’s criteria for development suitability in the Housing Study.

**Assessment of site as being suitable for development**

The supporting Housing Study provides the following assessment of the New Town grouping (ref. 17) against the Council’s Assessment Criteria. This identifies the group as being partially suitable for development.

*Figure 2 - Assessment of site groupings*

Assessment Group Number	Assessment Group Name	10 min walk to local convenience services	30 min walk to employment cluster	Access to wider cycle network	Active travel overall	Public transport	Community infrastructure	Flood risk	Summary
17	New Town	Green	Green	Red	Red	Green	Yellow	Green	Yellow

As the site falls immediately adjacent to this grouping, it is reasonable to adopt the same conclusion as to the suitability of the site for development. In order to provide reasoned justification for this, we have recreated the

assessment matrix for the Glenogle Road site below, using the same assessment criteria set out by CEC. In summary, this exercise finds the Site is suitable for development for housing led mixed uses.

## **Active Travel**

### ***Does the site support travel by foot to identified convenience services? Yes***

The site is well located for access to grocery shopping, being within 5-10 minutes walk of both the Tesco and Lidl supermarkets via Broughton Road. This is supplemented by the availability of local convenience shops, including newsagents, on Dundas Street, within nearby Stockbridge, and the M&S Simply Food on Canonmills. All of these shopping locations fall within 10 minutes / 800m of the Glenogle Road site, the distance used by CEC as an appropriate time and distance to walk to access local shopping. The site therefore supports travel by foot to convenience services to support non-car travel and reduce the need to travel long distances.

### ***Does the site support travel by foot to identified employment clusters? Yes***

The site is also well located for access to identified employment clusters, again to support non-car travel and reduce the need to travel longer distances. In terms of proximity to employment, the Council has determined that a 30 minute walk time (2,400m distance) is the appropriate maximum.

The Glenogle Road site is located adjacent to a number of existing employment sites, including substantial office buildings at Tanfield, Brandon St and Henderson Row. While notably the site lies within 1,000 metres of George Street, at the heart of the city centre and the various employment opportunities this provides.

### ***Does the site have access to the wider cycle network? Yes***

The site has convenient access to both the Quiet Routes and National Cycle networks. Quiet Route 20 (Craigleith – Leith Walk - Restalrig) is located to the north of the site accessed via Inverleith Row, while National Cycle Route 75 (Leith – City Centre – Balerno) and Quiet Route 13 (Warrison – Trinity) can be accessed from Broughton Street.

### ***Does the site support active travel overall? Yes***

Given the site's credentials in terms of accessibility by foot (to both convenience services and employment clusters) and cycle (via the wider cycle network) discussed above, it clearly supports active travel overall.

## **Public Transport**

### ***Does the site support travel by public transport? Yes***

The Council's framework for assessment is based on the Edinburgh Sustainable Transport Study (ESTS). Within this document the Public Transport Accessibility Level (PTAL) of selected places is mapped based on how close they are to public transport, taking into account walking time to access public transport services (i.e. to a stop or station) and how frequent services are in the area.

The site benefits from being located close to bus stops on Brandon Terrace, Inverleith Terrace and Canonmills which are served by a number of bus routes providing a frequent and convenient service, as shown in the table below. The Edinburgh Tram line and other city centre transport facilities including the Bus Station and Waverley railway station are also within walking and cycling distance.

The Glenogle Road site therefore has good access to train, tram and suitable bus services and as such is able to support travel by public transport. Further, given the Glenogle site lies adjacent to the New Town assessment group (ref. 17), it is reasonable to reach a similar conclusion with regards to public transport.



## Community Infrastructure

### ***Does the site have sufficient primary school infrastructure to accommodate the development without further intervention?*** Yes

The Background Monitoring Statement which supports Choices for City Plan 2030 shows the projected capacities at Edinburgh's schools in 2032. The school role projections are based upon expected population increases due to new house building.

The site falls within the catchment of Stockbridge primary school which has a projected capacity at 2032 of up to 100. The site falls within the catchment of St Mary's Roman Catholic Primary School, which has a projected capacity of 101-200 spaces. However, the Housing Study also identifies that a new primary school could be required to deal with education capacity issues in the North of Edinburgh.

On the basis of the above, while there is capacity within catchment primary schools for additional housing development, it is considered that any primary school capacity issues could also be mitigated through appropriate intervention, including contributions from residential development to enable the release of the site for development.

### ***Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?*** Partially

The site falls within the Broughton High School Catchment. The Monitoring Statement projects that in 2032, there will be no capacity at the school. It also falls within the catchment of St Thomas of Aquins for Roman Catholic Secondary schools, where there is also no projected capacity.

However, the Housing study identifies that a new secondary school for north Edinburgh could provide the additional school accommodation which would be required.

On the basis of the above, it is considered that secondary school capacity issues could be mitigated through appropriate intervention, including contributions from residential development to enable the release of the site for development.

## Flood Risk

### ***Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?*** Yes

The SEPA flood map identifies that the site is at low risk of fluvial flooding.

## Summary

The above assessment for the Glenogle Road site is summarised in the table below. This clearly demonstrates that the Site is suitable for housing led mixed use development and accordingly is suitable to be released for development.

10m walk to local convenience services	30 minute walk to employment	Access to wider transport network	NCN/Quiet Route 5 year intervention	Active Travel (overall)	Public Transport	Primary Capacity	Secondary capacity	Community Infrastructure overall	Flood Risk	Summary

**Existing LDP designation and allocation of the site for housing in City Plan 2030**

In the current adopted Edinburgh Local Development Plan (2016), the Glenogle Road site is identified as white land in the urban area, where development is generally supported, subject to compliance with other development plan policies.

In the emerging City Plan 2030, the site should be identified for housing led mixed uses.

**Choice 2 - Densities**

Choice 2 proposes a revision to the Council's density policies to make best use of the limited space in our city and to ensure that sites are not under-developed. On behalf of ASI we support this proposed change. Brownfield sites such as Glenogle Road developed to an appropriate density can contribute to the sustainable development of the city, reducing the need for greenfield sites to be released.

Initial development options for the site demonstrate that the site could be developed for a residential scheme of approximately 100 units, and would represent the efficient use of the site.

**Choice 16 – Delivering Office, Business and Industry Floorspace**

Choice 16 proposes a loss of office policy to retain accessible office accommodation, and would not allow the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. The policy is proposed to apply across the city.

On behalf of ASI, we do not support the inclusion of this policy as currently worded. It is important that restrictive policies such as this incorporate sufficient flexibility to respond to the specific circumstances of individual sites. The blanket application of the policy across the city, rather than focused on the city centre, strategic office locations and other prime office locations unreasonably restricts redevelopment of unviable business locations to uses more appropriate to their context.

As noted earlier, the ASI building at Glenogle Road is currently operated as a data centre and includes only a modest level of office floorspace which is ancillary to the data centre function. It is also located in an area of the city within which there is only a limited demand for offices with achievable rents reflective of this. The building itself is configured primarily as a data centre, and would not be easily, or economically, converted to modern office space. Aberdeen Standard Investments are therefore looking at the longer term potential of the site.

We suggest, therefore, that the policy should instead provide the opportunity to justify redevelopment of business floorspace for alternative uses, such as housing, in circumstances such as where existing buildings are not easily reconfigured to meet the needs of the modern office occupier, or where expert opinion is that demand for office floorspace in a particular location is too low to support the existing quantum.

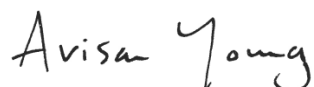
**Summary and conclusions**

On behalf of Aberdeen Standard Investments, we welcome this opportunity to submit representations to Choices for City Plan 2030.

These representations support the identification of land in ASI's ownership at Glenogle Road as a residential led mixed use site in City Plan 2030. The site has the potential to deliver significant new housing to help meet Edinburgh's housing needs.

These representations have demonstrated that the site is suitable to come forwards as a residential-led mixed use development site and should be identified as such within the Proposed Plan.

Yours sincerely

A handwritten signature in black ink that reads "Avison Young". The signature is written in a cursive, flowing style.

**Avison Young (UK) Limited**  
**For and on behalf of Aberdeen Standard Investments**  
Enc

# ASI - Glenogle Road, Edinburgh

