

Customer Ref: 01731 Response Ref: ANON-KU2U-GPEA-4
Name ROB NEWTON
Response Type Agent / Consultant
On behalf of: Police Scotland

Supporting Info Yes
Email robert.newton@avisonyoung.com

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

Customer Ref: 01731 Response Ref: ANON-KU2U-GPEA-4

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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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

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 Not Answered

Explanation Not Answered

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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 Police Scotland we support this proposed change. The initial site context and site analysis work undertaken by Meta Architecture (see appendix 1 of the representation document) has demonstrated that the Police Scotland Fettes site could accommodate higher densities while respecting key place making principles.

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:
Name
Response Type
On behalf of:

Supporting Info

Email

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 Under Choice 4, the Council advises they want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 to highlight the key elements that design, layout, open space, biodiversity net gain and community infrastructure development should deliver. Police Scotland supports the preparation of a Place Brief for its site at Fettes and would welcome the opportunity for itself, and advisors, to work with the Council in preparing a Place Brief. Map 7 of Choices for City Plan 2030 presently identifies a Place Brief Area for the site which also includes the remainder of site 95, the former Royal Victoria Hospital site and two sites at Orchard Brae (Orchard Brae House and Finance House). In relation to Police Scotland's site at Fettes, it is our view that a Place Brief for the site would be best limited to the extent of site 95 only rather than extending to cover all four sites presently indicated in the Choices documentation. A separate Place Brief or Briefs could be prepared for the other sites. This would better reflect the differing characteristics of these individual sites.

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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Choice 12 A

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

Short Response: Not Answered

Explanation

Identification of Fettes site for Housing led development:First and foremost, Police Scotland welcomes that Choices for City Plan 2030 has identified its site at Fettes for new housing as part of wider site 95 “Crewe Road South”. An extract of the supporting Environmental Report shows the boundaries of site 95 and this is reproduced in the representation document. In addition to Police Scotland’s land at Fettes, the wider site also includes an adjacent post office building and Bank of Scotland branch. Site 95 is identified on Map 7 and Map 8 of Choices as an urban area housing led mixed use site to deliver new homes under the Council’s preferred option – Option 1: Delivery by the Council and its partners within the Urban Area. It is also identified on map 15 as a potential housing-led mixed use site under option 3 – a blended approach to housing delivery. Police Scotland supports the identification of its land at Fettes for housing led mixed use development in Choices and encourages its continued identification and allocation for housing led mixed use development in City Plan 2030. As part of its wider estates strategy, Police Scotland is considering the possible vacation of its Fettes site during the lifetime of the City Plan 2030. This strategic opportunity has the potential to act as a catalyst for change and release financial value that can be invested in modernising the police estate nationally to help achieve the aims of its estates strategy. It has the potential to deliver significant benefits to the Police and wider communities across the whole of Scotland (as outlined in Section 2 of the representation document). The existing site at Fettes is inefficient, aging and in poor condition and requires significant maintenance. The site is also under-utilised and is no longer the best location for some of its function and facilities. The existing facilities do not support modern digitally-enabled processes and new forms of crime prevention which require space to be well designed and flexible with activity based work settings. Fettes is also largely separated from Police Scotland’s partners and in this regard, does not align with Police Scotland’s current estate strategy to co-locate in more multi-agency buildings providing integrated services. The benefits that could be derived from vacating Fettes extend to Police Scotland’s officers, staff, local communities and its stakeholders. The relocation to modern, fit-for-purpose buildings would support data-driven, digitally enabled policing, transformation programmes, officer and staff well-being and agile working. There is also the potential to positively impact the wider reconfiguration across the Edinburgh City Estate and co-locate with partners to deliver integrated public services. Officers and staff will benefit from modernised and flexible workspace and improved access to partner agencies to achieve better outcomes for the public and communities. The release of the site would also make a significant contribution towards Edinburgh’s housing needs delivering much needed homes in a central urban site. Assessment of site as being suitable for development:The supporting Housing Study provides the following assessment of Site 95 against City of Edinburgh Council’s (CEC’s) Assessment Criteria. This identifies that the site is partially suitable for development. We have re-run this assessment matrix exclusively for land in Police Scotland’s ownership at Fettes and this can be found at paragraph 3.7 of the representation document. This identifies that the Fettes site is suitable for development for housing led mixed uses. Our findings are set out below, and this is summarised in a matrix/table at the end of this section.Active TravelDoes the site support travel by foot to identified convenience services? YesThe site is well located for access to grocery shopping. The site sits immediately adjacent to a Waitrose supermarket. Additionally, a newsagent lies at the roundabout at the junction with Craighleith Road and Orchard Road and further retail provision is available along Comely Bank Road/Raeburn Place and at Stockbridge High Street. These shops and Stockbridge High Street fall

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Supporting Info Yes

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Response Type Agent / Consultant

On behalf of: Police Scotland

within a 10 minute (800m) distance to the site (which is determined by CEC as an appropriate time to reach a local shop). The site therefore supports travel by foot to convenience services to support non-car travel and reduce the need to travel longer distances. Moreover, the redevelopment of the site also offers the potential to open up connections and permeability through the site itself which would increase accessibility to the Waitrose store and other grocery shops for existing residents surrounding the site. Does the site support travel by foot to identified employment clusters? Yes The site is well located for access to employment clusters to support non-car travel and reduce the need to travel longer distances. A 30 minute walk time (2,400m distance) is determined to be an appropriate maximum time to reach employment. Notably, the site lies within 2,400m of the defined city centre making it easy to reach a wide range of employment opportunities. The site also lies in close proximity to the Western General Hospital and an employment cluster at Ferry Road/Crewe Toll. Does the site have access to the wider cycle network? Yes The site provides easy access to the National Cycle Network and Quiet Routes. Quiet Route 20 (Craigleith –Leith Walk – Restalrig) runs along the northern boundary of the site at Carrington Road. Easy connections are also possible to other cycle routes including National Cycle Route 1 and Quiet Route 11 and 12. Does the site support active travel overall? Yes Taking into account the above access by foot and cycle, the Fettes site clearly supports active travel overall, offering good access to shopping and employment by walking and easy access to the cycling network. Public Transport Does the site support travel by public transport? Yes In the Council’s assessment, public transport access is assessed by access to bus services with PTAL (Public Transport Accessibility Level) score of mainly 3 or higher, rail stations within walking distance and existing/committed tram from stops within walking distance, taking into account service capacity. If the site has good access to train, tram or suitable bus services with sufficient capacity this will be classed as a yes. If the site does not have good access but this could be addressed through interventions it will be classed as partially suitable. The map shown at paragraph 3.15 of the representation document is included in Steer Jacobs 2019 “Edinburgh’s Strategic Sustainable Transport Study – Phase 2” Report and outlines transport accessibility across the city. The site lies adjacent to Crewe Road South, which based on this map, has a transport accessibility of 4 and above. The site lies in close proximity to bus stops and services on Comely Bank Road and Crew Road South where there is frequent access to the following services: Bus Stop 24, 29, 42, X29 (heading west only) Crewe Road South 19, 24, 29, 37, 38, 47, 113, N37, X29, X37, X47. On the basis of the above, it is considered that the site has good accessibility to public transport. Community Infrastructure Does the site have sufficient primary school infrastructure to accommodate the development without further intervention? Partially 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 Flora Stevenson primary school which has a projected capacity at 2032 of up to 100. The site also falls within the catchment of Holycross Roman Catholic Primary School, where there is no projected capacity at 2032. However, the site falls immediately adjacent to the catchment of St Mary’s Primary where there is a projected capacity of 101-200 spaces. The Housing Study 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, it is considered that primary school capacity issues could 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. The Housing study identifies that a new secondary school for north Edinburgh could provide the additional 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

Customer Ref: 01731 Response Ref: ANON-KU2U-GPEA-4

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On behalf of: Police Scotland

importance for flood management? Yes The SEPA flood risk map identifies that the site is not at risk of fluvial flooding. The above assessment for the Fettes site is summarised in a matrix review table at paragraph 3.27 of the representation document. This clearly demonstrates that the Fettes site is suitable for housing led mixed use development and accordingly is suitable to be released for development. Existing open space designation and allocation of site for housing in City Plan 2030: In the current adopted Edinburgh Local Development Plan 2016, the Fettes site is identified as part white land in the urban area and part protected open space. The part of the site which is designated as open space comprises land at the north of the site which is used privately by the police for recreational uses and dog training/exercising. There is no public use or access to the existing open space on the site. An extract of the current 2016 proposals map is shown at paragraph 3.30 of the representation document. In the emerging City Plan 2030, the green space designation should be removed from the northern part of the Police Site and the whole site identified for housing led mixed uses. New open space provision on the site should be identified as part of future redevelopment proposals through a masterplanning process aimed at providing high quality and accessible open space as part of site specific proposals. The removal of the existing open space designation is justified below against current local plan policy Env 18 Open Space Provision. This states: "Proposals involving the loss of open space will not be permitted unless it is demonstrated that: a) There will be no significant impact on the quality or character of the local environment and b) The open space designation is part of a larger area or of limited amenity or leisure value and there is a significant over-provision of open space servicing the immediate area and c) The loss would not be detrimental to the wider network including its continuity or biodiversity and either d) There will be a benefit in allowing the development in terms of either alternative equivalent provision being made or improvement to an existing public park or other open space or e) The development is for a community purpose and the benefits to the local community outweigh the loss." In terms of criterion a), it is considered that the potential redevelopment of the site for a housing led mixed use development offers the opportunity to significantly enhance the quality and character of the local environment, compared to its existing situation, through a new high quality development. Presently the part of the site which is currently designated as open space provides no public access. There is the potential as part of future redevelopment proposals to provide new and enhanced open space within the development which could provide both private and more significantly, public open space. In terms of criterion b), the area of designated open space is wholly in private ownership and use and currently offers no public amenity or leisure value. The Fettes site also lies in a part of the city where there is significant open space provision which serves the immediate area. Open Space 2021 requires all new homes to be within 400 metres of a good quality greenspace of at least 500sqm and be 800m walking distance of an accessible large green space of at least 2 hectares. Most notably the site lies under 300m from Inverleith Park which provides approximately 20 hectares of quality open space. The removal of the open space designation from the site will also not impact upon existing accessibility to quality green space given that the site is not currently accessible to members of the public. In terms of criterion c), it is considered that there is a real opportunity for the biodiversity of the site to be enhanced through its redevelopment. Redevelopment also offers the opportunity to increase permeability and connectivity through the site which will improve access to the wider open space network. In terms of criterion d) and e), the area of designated open space does not offer any community benefit given its private ownership and lack of accessibility. The allocation of the site for housing led mixed use development would offer the opportunity to redevelop the site for high quality new development which will bring community benefits, for example, through the delivery of new residential development to meet housing needs and the potential to open up access to and routes through the site to the wider public. Key Development Principles for Fettes Site: Police Scotland's site at Fettes provides a significant opportunity to redevelop a key urban site for residential led mixed use development and in doing so deliver much needed housing. Its redevelopment also offers an opportunity to create a cohesive and sustainable urban environment with a strong sense of place that is more fitting to the area than the existing built form. Its redevelopment could positively contribute to the local environment with a bespoke site responsive place making strategy and in doing so create new links in the city by forming new routes through the site, with new areas of public and private

Customer Ref: 01731 Response Ref: ANON-KU2U-GPEA-4
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open space. Meta Architecture's Site Context and Development Principles document in appendix 1 of the representation document appraises the site and its surrounding context and sets out some initial development principles which could help to inform any future masterplanning of the site. We hope this document will help to inform the preparation of development principles for the site at the Proposed Plan Stage and any Place Brief process that might follow, as well as related consultation with the public and stakeholders. As noted within the document, these are indicative thoughts at this initial stage and do not present any 'fixed' proposals for the site. Based on the analysis undertaken by Meta Architecture, a key development principles diagram for the site has been prepared which is set out in appendix 1 of the representation document. At this stage, this has been prepared to reflect the high level nature of similar diagrams in the existing LDP rather than a more detailed masterplan for the site. Key opportunities/development principles for the site are set out in full in Meta's document. In summary these could include:

- Residential led mixed use development to create a new high quality residential development with a bespoke site-responsive place making strategy;
- Improved walking and cycling linkages through the site to improve connections in the area;
- New open space provision to be included on site as part of redevelopment, including new publically accessible open space;
- Potential to re-use and/or redevelop existing buildings if considered appropriate;
- Protect and enhance key views across site to the Edinburgh skyline (Arthur's Seat, Charlotte Square Dome, Edinburgh Castle and the Hub) and key views north to Fettes College;
- Development in southern part of site to be urban in nature to key into the fabric of city with buildings forming a recognisable urban structure. Development in the northern zone to mediate between urban and lower density spatial structure to north.
- Inclusion of a landscape buffer (with breaks for public access) around the north and eastern perimeters of the site to respond to building lines and set backs along Carrington Road/Fettes Avenue.
- Preserve and enhance 'view corridor' from/to Fettes College along Fettes Avenue.
- Protect and enhance the setting of adjacent listed buildings, including Fettes College.
- Opportunity to create new improved positive street frontages and present a positive solution to the area around Waitrose.

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 Not Answered

Explanation

Customer Ref: 01731 Response Ref: ANON-KU2U-GPEA-4

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On behalf of: Police Scotland

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 Not Answered

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 Not Answered

Explanation

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 Not Answered

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Explanation

Customer Ref: 01731 Response Ref: ANON-KU2U-GPEA-4

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On behalf of: Police Scotland

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **12 BX**

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

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 C**

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

Short Response

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 D

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

Short Response

Explanation

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

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

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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 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:

Supporting Info

Name

Email

Response Type

On behalf of:

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:

Supporting Info

Name

Email

Response Type

On behalf of:

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: 01731 Response Ref: ANON-KU2U-GPEA-4
Name: ROB NEWTON
Response Type: Agent / Consultant
On behalf of: Police Scotland

Supporting Info: Yes
Email: robert.newton@avisonyoung.com

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

OFFICIAL

**Representations to 'Choices for City Plan 2030'
On behalf of Police Scotland**

April 2020

Contents

1.	Introduction.....	1
2.	Background to Police Scotland’s Estate Strategy.....	3
3.	Choice 12 – Building our new homes and infrastructure	5
4.	Choice 2 (Densities) and Choice 4 (Place Brief)	13
5.	Summary and Conclusions.....	14

Appendix 1 Context Study and Development Principles by META Architecture

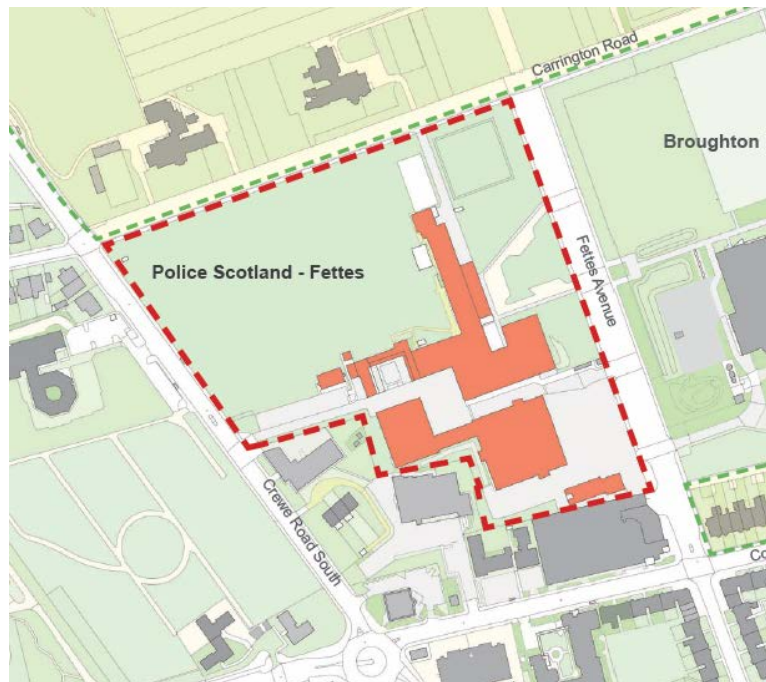
Prepared By: Rob Newton/Caroline Nutsford

Status: Final

Date: April 2020

1. Introduction

- 1.1 These representations to “Choices for City Plan 2030” are prepared by Avison Young on behalf of Police Scotland and relate specifically to land in Police Scotland’s ownership at Fettes. They should be read alongside the ‘Context Study and Development Principles’ document prepared by META Architecture and attached at appendix 1.
- 1.2 The Fettes site extends to approximately 14 acres and is currently used by Police Scotland for offices with associated facilities including vehicle workshops, kennels, specialist operations buildings, catering, parking and recreational areas. Police Scotland is considering options for its current operations at the Fettes site in line with its national Estate Strategy 2019 and the ambition to deliver an estate fit for 21st century policing services.
- 1.3 The site occupies a key urban location in the Inverleith area of Edinburgh. It is bounded to the north by Carrington Road, beyond which lies Fettes College. To the east lies Fettes Avenue, across which is Broughton High School. To the west, the site is bounded by Crewe Road South beyond which lies a cemetery, the former Royal Victoria Hospital, the wider residential area of Craigleith and the Western General Hospital. To the south, the site is bounded by a range of buildings including a BT telephone exchange, a post office sorting office, a Waitrose superstore and three residential properties.
- 1.4 A site location plan is provided below.



- 1.5 Police Scotland’s site at Fettes is identified in Choices for City Plan 2030 as forming part of site 95 ‘Crewe Road South’ and identified by City of Edinburgh Council (CEC) for residential led mixed use development.

Structure and scope of representations

1.6 Our detailed representations are set out in the subsequent sections of this report and are supported by a Site Context Study and Development Principles document prepared by Meta Architecture included at Appendix 1. Our representations relate primarily to Choice 12 in respect of Building New Homes and Infrastructure. Other comments are also made in respect of Choice 2 in relation to development densities and in respect of Choice 4 in relation to Place Briefs. In doing so, this report comprises the following sections:

- Section 2: Background to Police Scotland's Estate Strategy;
- Section 3: Representations to Choice 12 – Building our new homes and Infrastructure;
- Section 4: Representations to Choice 2 (densities) and Choice 4 (Place Briefs);
- Section 5: Summary and Conclusions.

1.7 A summary of our representation is provided below insofar as these relate to each choice.

Choice 12 – Building our new homes and infrastructure

- Police Scotland supports the identification of its land at Fettes for housing led mixed use development.
- The open space designation which currently extends across the northern part of Police Scotland's site in the Edinburgh Local Development Plan 2016 should be removed and the whole site allocated for residential led mixed use development. New open space provision on the site should be identified as part of a masterplan process for future redevelopment proposals.
- The accompanying Context Study and Development Principles document by Meta Architecture identifies the opportunities and key principles for the site's redevelopment and should be used to inform key development principles at proposed plan stage.

Choice 2 – Improving the quality, density and accessibility of development

- Police Scotland supports the proposed increase in housing densities across the city.

Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans in our Communities

- Police Scotland supports the preparation of a Place Brief for its site at Fettes and would welcome the opportunity to be part of this process. Map 7 presently identifies a Place Brief Area covering site 95, the former Royal Victoria Hospital and two sites at Orchard Brae. It is considered that it would be more appropriate for a Place Brief for the site to relate to the extent of site 95 only given that it is physically divorced from the other sites and that each site is likely to raise differing issues for consideration.

2. Background to Police Scotland's Estate Strategy

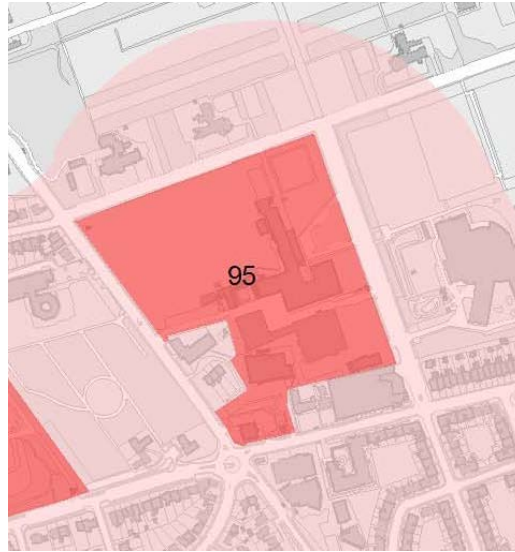
- 2.1 These representations in respect of Fettes are made in the context of Police Scotland's wider Estate Strategy 2019. The strategy provides a framework within which Police Scotland's estate will be transformed to achieve its long-term policing vision. A copy of the Estate Strategy 2019 is provided in appendix 2.
- 2.2 At the heart of Police Scotland's Estate Strategy is the ambition to deliver an estate fit for 21st century policing services. The estate strategy seeks to respond to the changing needs of Police Scotland's communities; the need to maintain public visibility and confidence, and the fiscal constraints within which Police Scotland operates.
- 2.3 Police Scotland currently has a large, complex and ageing estate that despite improvements remains a legacy of the operating structures that predate Police Reform. A visible, flexible, modernised estate is needed to support new service models and enable Police Scotland to provide a police service to the people of Scotland that is fit for the 21st century. A modernised estate will also help to enable a reduction in carbon emissions to comply with Scottish Government's commitment to reduce environmental impact of service activities.
- 2.4 Police Scotland's estate strategy vision also reflects its strong commitment to partnership and the future for Police Scotland is a co-located estate in multi-agency buildings to provide integrated services with its partners such as the other emergency services, local authorities, health and social care and criminal justice agencies. As part of this, Police Scotland will move from an ageing, costly, inefficient, standalone estate to a more flexible, modernised network of mostly community bases co-located and integrated with partners. Through this approach, the police will deliver better value for money by having modern, digitally enabled and carbon efficient locations.
- 2.5 A key element of the Estate Strategy is to deliver a number of strategic projects. Some of Police Scotland's sites have the potential to act as catalysts for change, for example to transform operations, enable public services integration and release value that can be invested in improving policing outcomes. These strategic projects have the potential to improve the police estate and finances beyond specific land and buildings and in doing so, have a wider impact nationally across Scotland. Fettes is one such site and as such Police Scotland is considering options for its future use.
- 2.6 The Estate Strategy will deliver multiple benefits to Police Scotland officers, staff, its localities and its communities across Scotland. These include:
- For local communities – increased public visibility, presence, accessibility and equality of provision;
 - For police officers and staff – improved well-being through modernised facilities, efficient and operational effectiveness;
 - For the local economy – economic benefits through new investment;
 - For local Partners – opportunities for co-location, collaboration and joint estate planning;
 - For the environment – a reduced carbon impact and a significant step towards zero carbon; and
 - Other important benefits which include generating revenue streams to support financial sustainability.

2.7 The Estates vision also supports national policy; it is directly aligned to the Scottish Government's promotion of integrated public services, the Programme for Government low carbon objectives and Government support for placemaking principles that shape healthy communities.

3. Choice 12 – Building our new homes and infrastructure

Identification of Fettes site for Housing led development

3.1 Choices for City Plan 2030 identifies Police Scotland’s site at Fettes as part of wider site 95 “Crewe Road South”. An extract of the supporting Environmental Report shows the boundaries of site 95 below. In addition to Police Scotland’s land at Fettes, the wider site also includes an adjacent post office building and Bank of Scotland branch.



3.2 Site 95 is identified on Map 7 and Map 8 of Choices as an urban area housing led mixed use site to deliver new homes under the Council’s preferred option – Option 1: Delivery by the Council and its partners within the Urban Area. It is also identified on map 15 as a potential housing-led mixed use site under option 3 – a blended approach to housing delivery.

3.3 Police Scotland supports the identification of its land at Fettes for housing led mixed use development in Choices and encourages its continued identification and allocation for housing led mixed use development in City Plan 2030.

3.4 As part of its wider estates strategy, Police Scotland is considering the possible vacation of its Fettes site during the lifetime of the City Plan 2030. This strategic opportunity has the potential to act as a catalyst for change and release financial value that can be invested in modernising the police estate nationally to help achieve the aims of its estates strategy. It has the potential to deliver significant benefits to the Police and wider communities across the whole of Scotland (as outlined in Section 2).

3.5 The existing site at Fettes is inefficient, aging and in poor condition and requires significant maintenance. The site is also under-utilised and is no longer the best location for some of its function and facilities. The existing facilities do not support modern digitally-enabled processes and new forms of crime prevention which require space to be well designed and flexible with activity based work settings. Fettes is also largely separated from Police Scotland’s partners and in this regard, does not align with Police Scotland’s current estate strategy to co-locate in more multi-agency buildings providing integrated services.

3.6 The benefits that could be derived from vacating Fettes extend to Police Scotland’s officers, staff, local communities and its stakeholders. The relocation to modern, fit-for-purpose buildings would support data-driven, digitally enabled policing, transformation programmes, officer and staff well-being and agile working. There is also the potential to positively impact the wider reconfiguration across the Edinburgh City Estate and co-locate with partners to deliver integrated public services. Officers and staff will benefit from modernised and flexible workspace and improved access to partner agencies to achieve better outcomes for the public and communities. The release of the site would also make a significant contribution towards Edinburgh’s housing needs delivering much needed homes in a central urban site.

Assessment of site as being suitable for development

3.7 The supporting Housing Study provides the following assessment of Site 95 against City of Edinburgh Council’s (CEC’s) Assessment Criteria. This identifies that the site is partially suitable for development.

Figure 3 – Assessment of individual sites

Site Number	Area Name	Assessment Group Number	10 min walk to local convenience services	30 min walk to employment clusters	Access to wider cycle network	NCN/Quiet route 5 year intervention	Active Travel (overall)	Public Transport	Primary Capacity	Secondary Capacity	Community Infrastructure Overall	Flood Risk	Summary
95	Crewe Road South	18	Green	Green	Green	Green	Green	Yellow	Red	Red	Yellow	Green	Yellow

Suitability for development **Yes Partially No**. See Figure 1 at page 3 for assessment criteria

3.8 We have re-run this assessment matrix exclusively for land in Police Scotland’s ownership at Fettes. This identifies that the Fettes site is suitable for development for housing led mixed uses. Our findings are set out below, and this is summarised in a matrix/table at the end of this section.

Active Travel

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

3.9 The site is well located for access to grocery shopping. The site sits immediately adjacent to a Waitrose supermarket. Additionally, a newsagent lies at the roundabout at the junction with Craighleith Road and Orchard Road and further retail provision is available along Comely Bank Road/Raeburn Place and at Stockbridge High Street. These shops and Stockbridge High Street fall within a 10 minute (800m) distance to the site (which is determined by CEC as an appropriate time to reach a local shop). The site therefore supports travel by foot to convenience services to support non-car travel and reduce the need to travel longer distances.

3.10 Moreover, the redevelopment of the site also offers the potential to open up connections and permeability through the site itself which would increase accessibility to the Waitrose store and other grocery shops for existing residents surrounding the site.

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

3.11 The site is well located for access to employment clusters to support non-car travel and reduce the need to travel longer distances. A 30 minute walk time (2,400m distance) is determined to be an appropriate maximum time to reach employment. Notably, the site lies within 2,400m of the defined city centre making it easy to reach a wide range of employment opportunities. The site also lies in close proximity to the Western General Hospital and an employment cluster at Ferry Road/Crewe Toll.

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

3.12 The site provides easy access to the National Cycle Network and Quiet Routes. Quiet Route 20 (Craigleith – Leith Walk – Restalrig) runs along the northern boundary of the site at Carrington Road. Easy connections are also possible to other cycle routes including National Cycle Route 1 and Quiet Route 11 and 12.

Does the site support active travel overall? Yes

3.13 Taking into account the above access by foot and cycle, the Fettes site clearly supports active travel overall, offering good access to shopping and employment by walking and easy access to the cycling network.

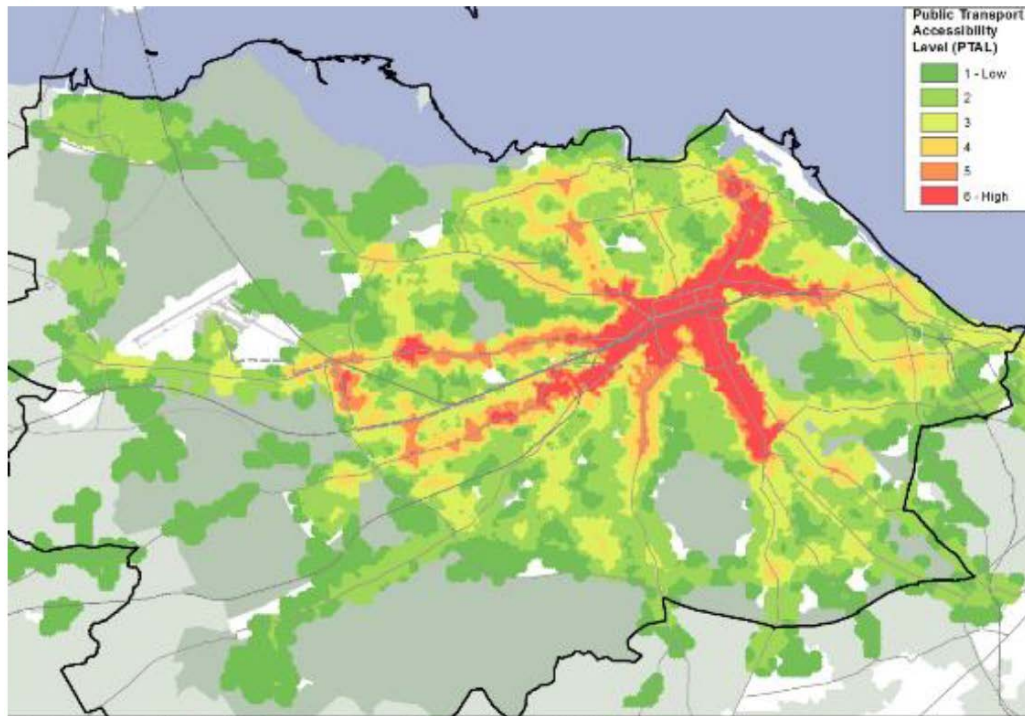
Public Transport

Does the site support travel by public transport? Yes

3.14 In the Council’s assessment, public transport access is assessed by access to bus services with PTAL (Public Transport Accessibility Level) score of mainly 3 or higher, rail stations within walking distance and existing/committed tram from stops within walking distance, taking into account service capacity. If the site has good access to train, tram or suitable bus services with sufficient capacity this will be classed as a yes. If the site does not have good access but this could be addressed through interventions it will be classed as partially suitable.

3.15 The below map is included in Steer Jacobs 2019 “Edinburgh’s Strategic Sustainable Transport Study – Phase 2” Report and outlines transport accessibility across the city. The site lies adjacent to Crewe Road South, which based on this map, has a transport accessibility of 4 and above.

Figure 4-5: Accessibility to the Transport Network



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3.16 The site lies in close proximity to bus stops and services on Comely Bank Road and Crew Road South where there is frequent access to the following services:

Bus Stop	Services
Comely Bank Road	24, 29, 42, X29 (heading west only)
Crewe Road South	19, 24, 29, 37, 38, 47, 113, N37, X29, X37, X47.

3.17 On the basis of the above, it is considered that the site has good accessibility to public transport.

Community Infrastructure

Does the site have sufficient primary school infrastructure to accommodate the development without further intervention? Partially

3.18 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.

3.19 The site falls within the catchment of Flora Stevenson primary school which has a projected capacity at 2032 of up to 100.

3.20 The site also falls within the catchment of Holycross Roman Catholic Primary School, where there is no projected capacity at 2032. However, the site falls immediately adjacent to the catchment of St Mary’s Primary where there is a projected capacity of 101-200 spaces.

3.21 The Housing Study identifies that a new primary school could be required to deal with education capacity issues in the North of Edinburgh.

3.22 On the basis of the above, it is considered that primary school capacity issues could 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

3.23 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.

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

3.25 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**

- 3.26 The SEPA floodrisk map identifies that the site is not at risk of fluvial flooding.
- 3.27 The above assessment for the Fettes site is summarised in the table below. This clearly demonstrates that the Fettes 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

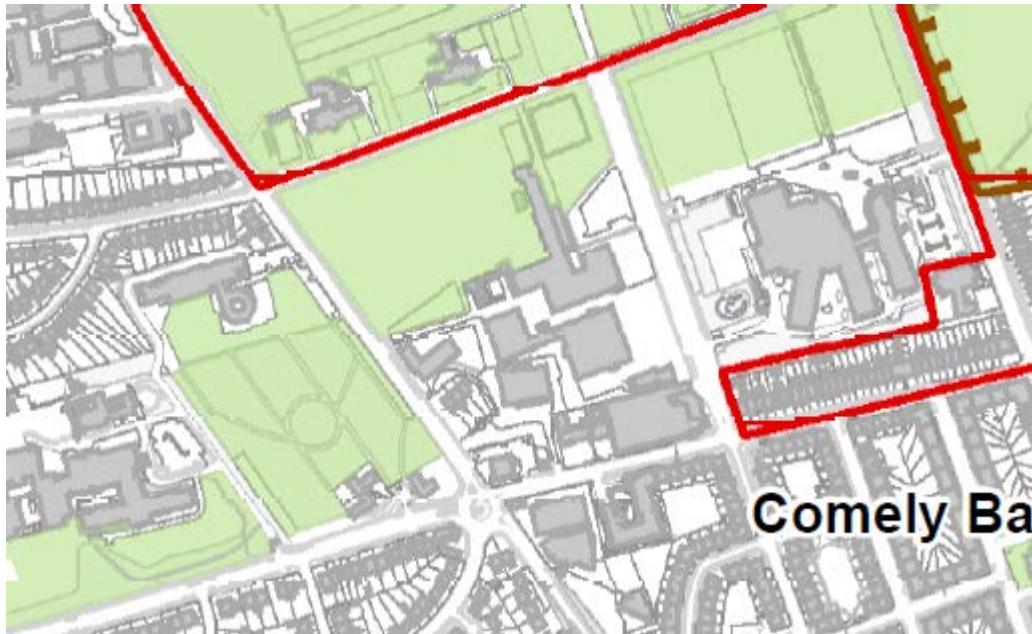
Existing open space designation and allocation of site for housing in City Plan 2030

- 3.28 In the current adopted Edinburgh Local Development Plan 2016, the Fettes site is identified as part white land in the urban area and part protected open space. The part of the site which is designated as open space comprises land at the north of the site which is used privately by the police for recreational uses and dog training/exercising. There is no public use or access to the existing open space on the site. An extract of the current 2016 proposals map is shown overleaf.
- 3.29 **In the emerging City Plan 2030, the green space designation should be removed from the northern part of the Police Site and the whole site identified for housing led mixed uses. New open space provision on the site should be identified as part of future redevelopment proposals through a masterplanning process aimed at providing high quality and accessible open space as part of site specific proposals.**
- 3.30 The removal of the existing open space designation is justified below against current local plan policy Env 18 Open Space Provision. This states:

"Proposals involving the loss of open space will not be permitted unless it is demonstrated that:

- a) *There will be no significant impact on the quality or character of the local environment and*
- b) *The open space designation is part of a larger area or of limited amenity or leisure value and there is a significant over-provision of open space servicing the immediate area and*

- c) *The loss would not be detrimental to the wider network including its continuity or biodiversity and either*
- d) *There will be a benefit in allowing the development in terms of either alternative equivalent provision being made or improvement to an existing public park or other open space or*
- e) *The development is for a community purpose and the benefits to the local community outweigh the loss."*



- 3.31 In terms of criterion a), it is considered that the potential redevelopment of the site for a housing led mixed use development offers the opportunity to significantly enhance the quality and character of the local environment, compared to its existing situation, through a new high quality development. Presently the part of the site which is currently designated as open space provides no public access. There is the potential as part of future redevelopment proposals to provide new and enhanced open space within the development which could provide both private and more significantly, public open space.
- 3.32 In terms of criterion b), the area of designated open space is wholly in private ownership and use and currently offers no public amenity or leisure value. The Fettes site also lies in a part of the city where there is significant open space provision which serves the immediate area. Open Space 2021 requires all new homes to be within 400 metres of a good quality greenspace of at least 500sqm and be 800m walking distance of an accessible large green space of at least 2 hectares. Most notably the site lies under 300m from Inverleith Park which provides approximately 20 hectares of quality open space. The removal of the open space designation from the site will also not impact upon existing accessibility to quality green space given that the site is not currently accessible to members of the public.
- 3.33 In terms of criterion c), it is considered that there is a real opportunity for the biodiversity of the site to be enhanced through its redevelopment. Redevelopment also offers the opportunity to increase permeability and connectivity through the site which will improve access to the wider open space network.

3.34 In terms of criterion d) and e), the area of designated open space does not offer any community benefit given its private ownership and lack of accessibility. The allocation of the site for housing led mixed use development would offer the opportunity to redevelop the site for high quality new development which will bring community benefits, for example, through the delivery of new residential development to meet housing needs and the potential to open up access to and routes through the site to the wider public.

Key Development Principles for Fettes Site

3.35 Police Scotland's site at Fettes provides a significant opportunity to redevelop a key urban site for residential led mixed use development and in doing so deliver much needed housing. Its redevelopment also offers an opportunity to create a cohesive and sustainable urban environment with a strong sense of place that is more fitting to the area than the existing built form. Its redevelopment could positively contribute to the local environment with a bespoke site responsive place making strategy and in doing so create new links in the city by forming new routes through the site, with new areas of public and private open space.

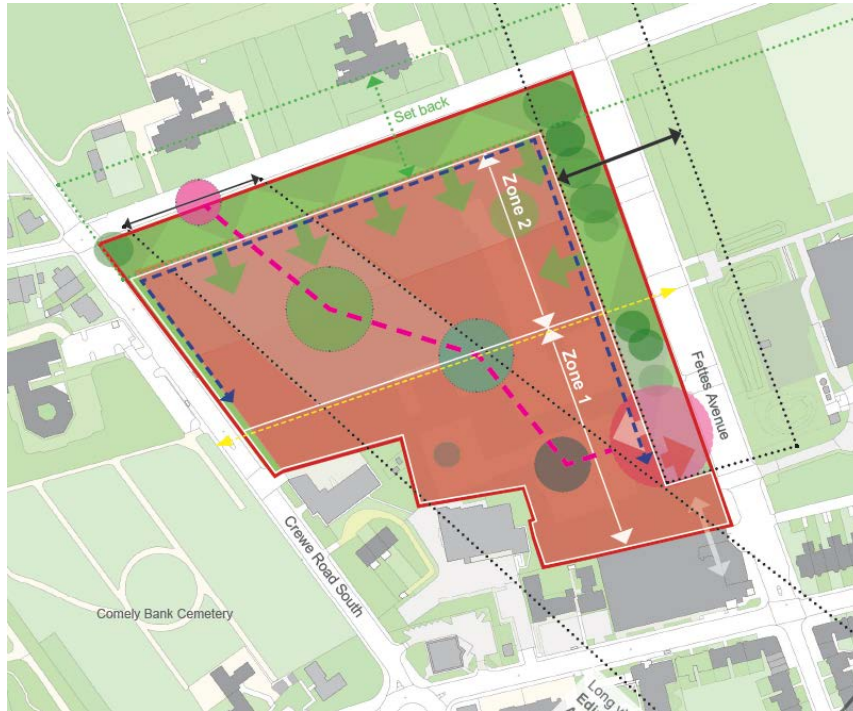
3.36 **Meta Architecture's Site Context and Development Principles document in appendix 1 appraises the site and its surrounding context and sets out some initial development principles which could help to inform any future masterplanning of the site. We hope this document will help to inform the preparation of development principles for the site at the Proposed Plan Stage and any Place Brief process that might follow, as well as related consultation with the public and stakeholders. As noted within the document, these are indicative thoughts at this initial stage and do not present any 'fixed' proposals for the site.**

3.37 Based on the analysis undertaken by Meta Architecture, a key development principles diagram for the site has been prepared which is set out in appendix 1 and reproduced overleaf. At this stage, this has been prepared to reflect the high level nature of similar diagrams in the existing LDP rather than a more detailed masterplan for the site.

3.38 Key opportunities/development principles for the site are set out in full in Meta's document. In summary these could include:

- Residential led mixed use development to create a new high quality residential development with a bespoke site-responsive place making strategy;
- Improved walking and cycling linkages through the site to improve connections in the area;
- New open space provision to be included on site as part of redevelopment, including new publically accessible open space;
- Potential to re-use and/or redevelop existing buildings if considered appropriate;
- Protect and enhance key views across site to the Edinburgh skyline (Arthur's Seat, Charlotte Square Dome, Edinburgh Castle and the Hub) and key views north to Fettes College;
- Development in southern part of site to be urban in nature to key into the fabric of city with buildings forming a recognisable urban structure. Development in the northern zone to mediate between urban and lower density spatial structure to north.

- Inclusion of a landscape buffer (with breaks for public access) around the north and eastern perimeters of the site to respond to building lines and set backs along Carrington Road/Fettes Avenue.
- Preserve and enhance 'view corridor' from/to Fettes College along Fettes Avenue.
- Protect and enhance the setting of adjacent listed buildings, including Fettes College.
- Opportunity to create new improved positive street frontages and present a positive solution to the area around Waitrose.



Map Key

- Residential, mixed use development zones. Indicative densities implied by colour depth.
- Landscaped buffer enhancing and maintaining essential characteristics of context and view corridors.
- View Corridor (part of essential character and setting)
- Connection Space/ Pedestrian access.
- Principal space locations: Different treatments, types and scales.
- Opportunity to key into/ mask the rear (north side) of supermarket.
- Main pedestrian connection strategy.
- Principal vehicular access.
- New, positive frontages that respond to immediate context.

Indicative only

4. Choice 2 (Densities) and Choice 4 (Place Brief)

Choice 2 – Improving the Quality, density and accessibility of Development

- 4.1 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 Police Scotland we support this proposed change. The initial site context and site analysis work undertaken by Meta Architecture has demonstrated that the Fettes site could accommodate higher densities while respecting key place making principles.

Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans in our communities

- 4.2 Under Choice 4, the Council advises they want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 to highlight the key elements that design, layout, open space, biodiversity net gain and community infrastructure development should deliver.
- 4.3 Police Scotland supports the preparation of a Place Brief for its site at Fettes and would welcome the opportunity for itself, and advisors, to work with the Council in preparing a Place Brief.
- 4.4 Map 7 of Choices for City Plan 2030 presently identifies a Place Brief Area for the site which also includes the remainder of site 95, the former Royal Victoria Hospital site and two sites at Orchard Brae (Orchard Brae House and Finance House). In relation to Police Scotland's site at Fettes, it is our view that a Place Brief for the site would be best limited to the extent of site 95 only rather than extending to cover all four sites presently indicated in the Choices documentation. A separate Place Brief or Briefs could be prepared for the other sites. This would better reflect the differing characteristics of these individual sites.

5. Summary and Conclusions

- 5.1 On behalf of Police Scotland, we welcome this opportunity to submit representations to Choices for City Plan 2030.
- 5.2 These representations support the identification of land in Police Scotland's ownership at Fettes as a residential led mixed use site in City plan 2030. The redevelopment of the site will deliver significant new housing to help meet the city's housing needs and provides the opportunity to realise a high quality site-responsive placemaking solution which could contribute positively to the local area and include accessible high quality open space where at present public access does not exist.
- 5.3 As noted in earlier sections and as part of its national Estate Strategy, Police Scotland is reviewing the possible vacation of the Fettes site in order to re-provide modern fit for purpose facilities and to facilitate investment in its wider estate. The site has the potential to support delivery of key investment in the Police Estate nationally, and support the wider reconfiguration to help deliver integrated public services to benefit the wider community.
- 5.4 These representations have demonstrated that the site is suitable to come forwards as a residential-led mixed use development site and has set out some initial development principles for the site which we hope will help inform key development principles for the site at Proposed Plan stage and as part of any Place Brief exercise, involving public and stakeholder consultation, that would follow.

Appendix I

Context Study and Development Principles by META Architecture

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APPENDIX 1
Context Study and Development Principles

This document has been prepared to inform representations to **Choices for City Plan 2030** and relates to the potential redevelopment of land owned by Police Scotland at Fettes Avenue, Edinburgh.

META architecture/15th February 2020

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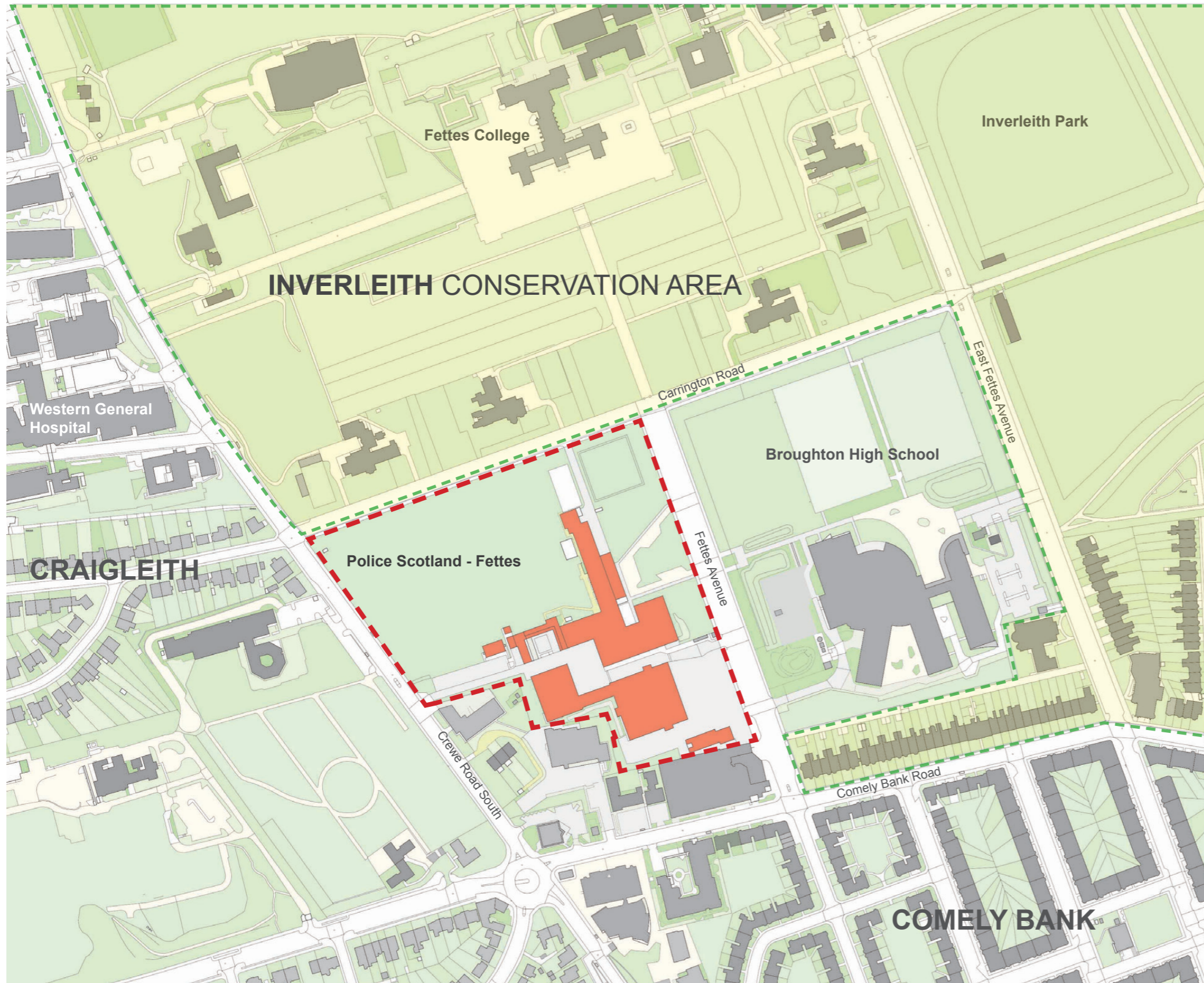
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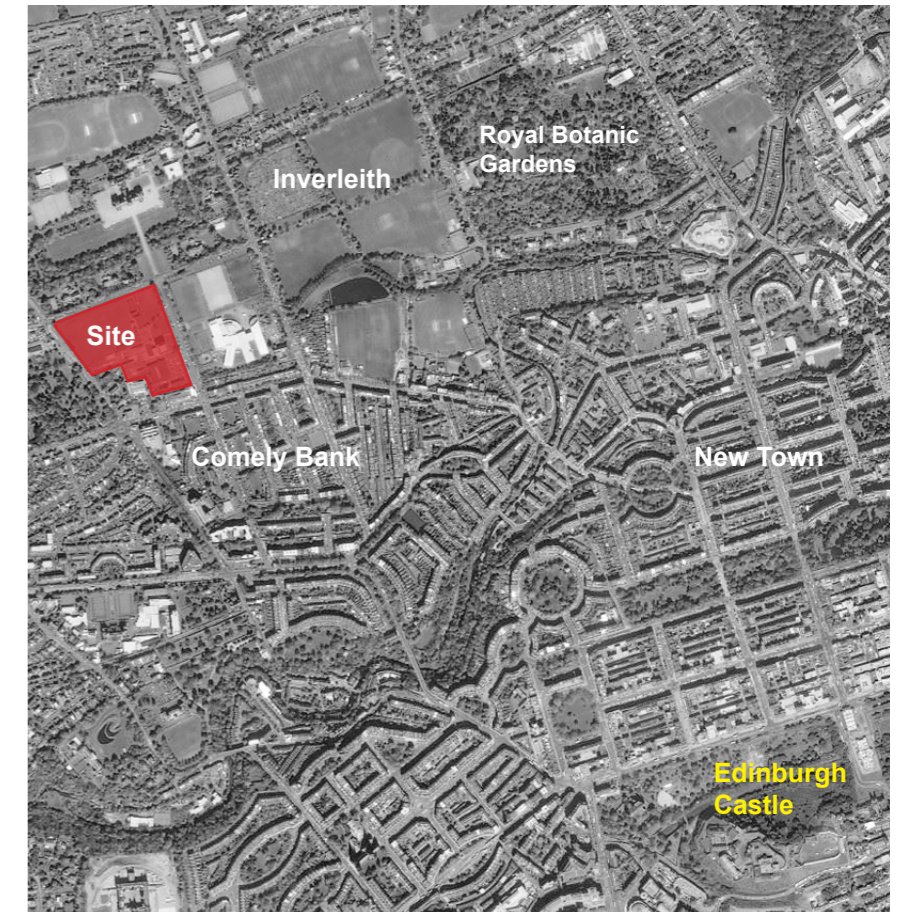


Site Location Plan

Site Location and Context

The subject site sits between the western fringes of the Inverleith Conservation area, Craigleith to the west and Comely Bank to the south. Covering an area of approximately 14 acres, the site extends occupy an entire block within the loose grid structure of the surrounding area.

Currently owned and occupied by Police Scotland, the site hosts a substantial office building complex, vehicle garaging, playing fields and leisure and training facilities, all used exclusively by Police Scotland.



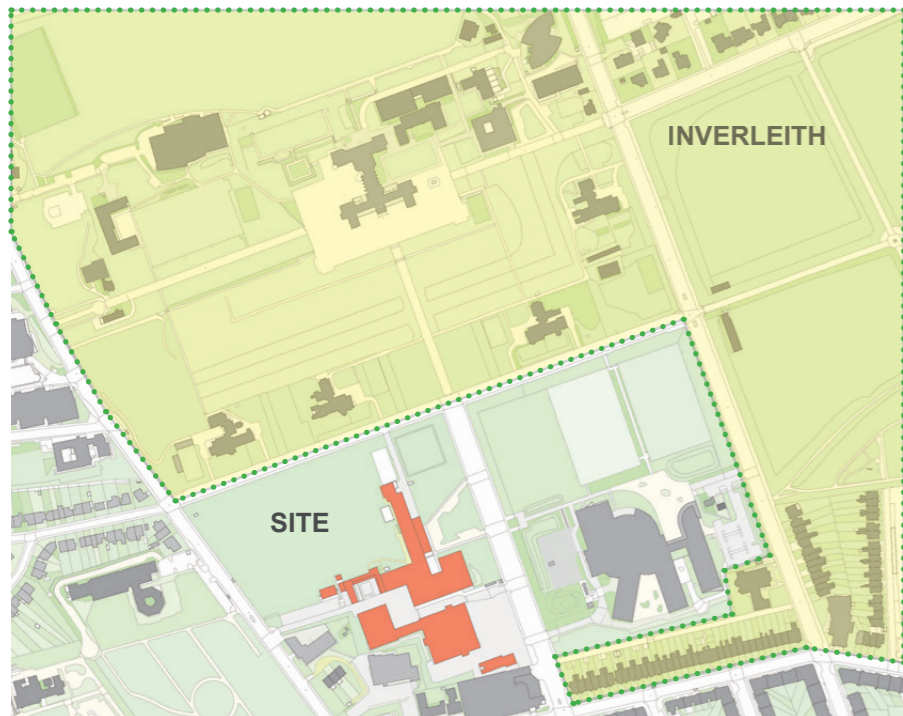
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Site Context
Inverleith
Key characteristics;

- Conservation Area
- Characterised by landscaped open spaces including Inverleith Park, The Royal Botanic Gardens, allotments and extensive grounds around Fettes College.
- Low density spatial structure punctuated with large Victorian dwellings with Georgian villas and terraces at southern and east extremities.
- In general, buildings are of grand proportions and scale with a variety of architectural style and form.
- Grid structure present throughout both in terms of street layout and planting/ open space plan.
- Wide, boulevard style tree lined streets.
- Bounded by adjacent areas with much higher density and urban structure - Stockbridge, Comely Bank and Warriston for example.
- Open structure allows for long panoramic views of the city beyond and specific architectural landmarks such as Fettes College.
- Open space hosts both public and private recreational spaces including school and public playing fields, allotments and sports facilities.

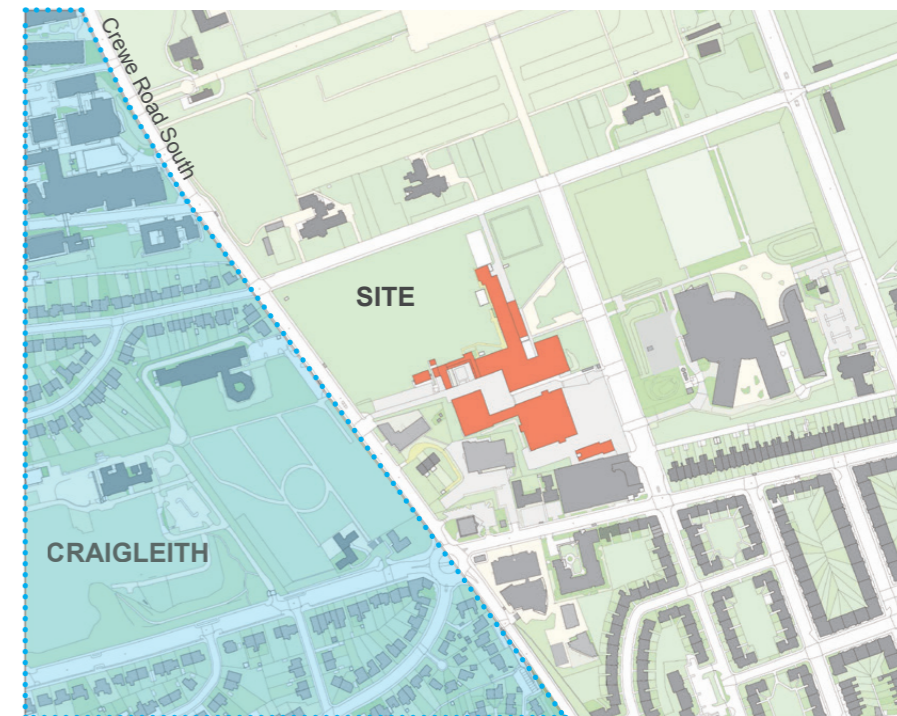
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Site Context
Comely Bank
Key characteristics;

- Situated to the south of the site.
- Strong urban pattern of sandstone Victorian tenements arranged in a grid form with communal open space within.
- Consistent architectural style using traditional materials and promoting a rhythm of pronounced bay windows, chimneys and occasional corner turrets.
- Minimal open space between blocks other than Dean Bowling Club in the heart of the grid form.
- Connected and adjacent to Stockbridge and the West End to the south.
- High density apartment buildings dominate, the vast majority being 4 storey in height.
- Principal streets run north- south with the southern extremities rising sharply towards Dean Park Crescent. The view looking up towards the southern along the cobbled street of Comely Bank Avenue typifies the setting relationship of the area.
- The northern edge of Comely Bank, Comely Bank Road running east- west hosts a number of retail units and commercial activity.



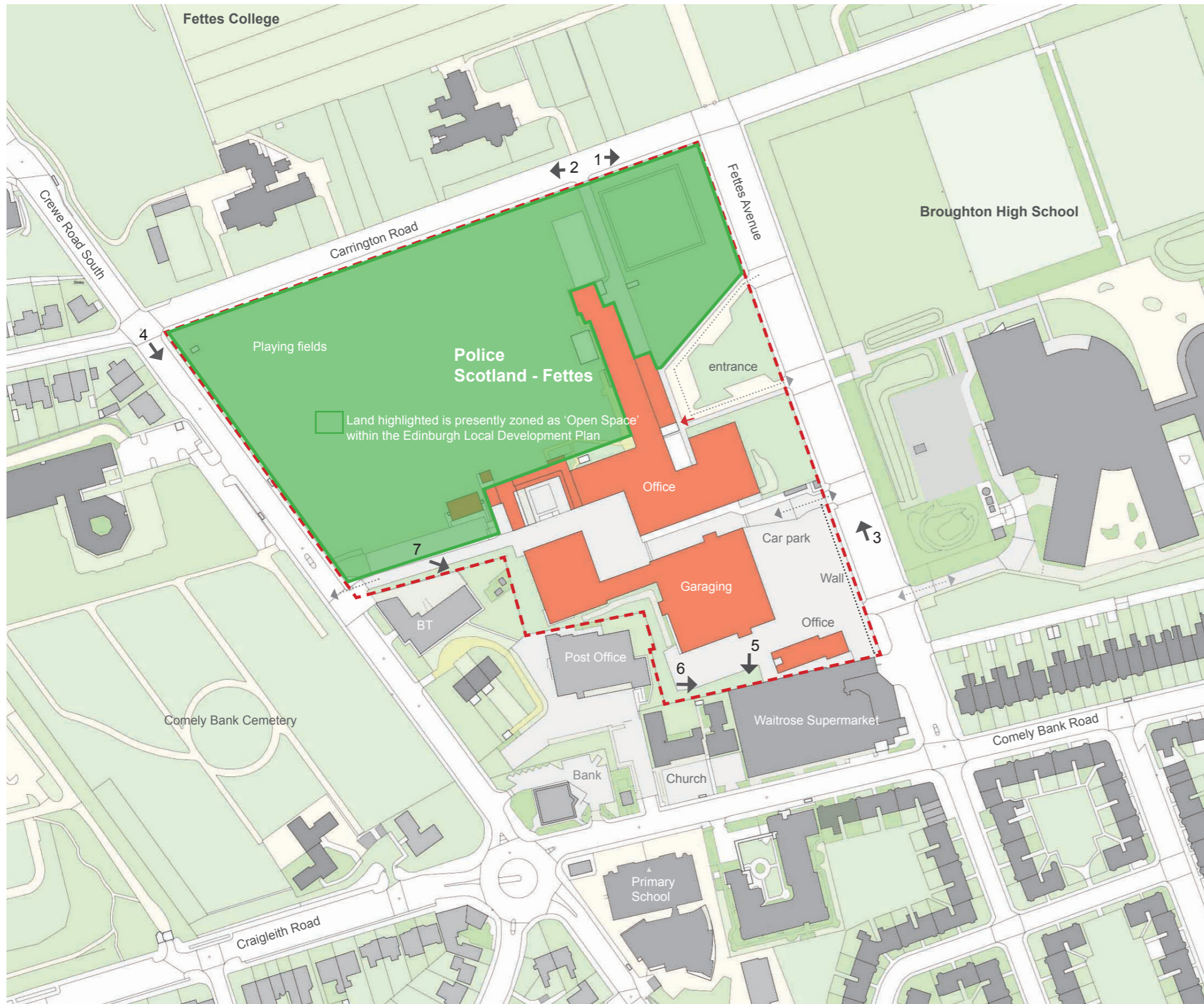
Site Context
Craigleith
Key characteristics;

- Situated to the west and south of the site.
- Principally suburban in spatial form and density with mostly detached or semi-detached dwellings.
- Streets arranged in loose crescents and terraces with large single storey or one and half story bungalows. Two storey properties are present along principal routes such as Craigleith Road.
- Variety of architectural styles along the fringes with mostly post war bungalow dwellings within the main body of the area.
- Spatially disconnected from immediate context by Crewe Road South which is lined with stone walls and mature trees.
- The spatial structure of the residential streets is interrupted by two significant hospital complexes- The former Royal Victoria Hospital off Craigleith Road and The Western General Hospital on Crewe Road South.
- The intense density of The Western General campus dominates the setting of the northern regions of Craigleith and Crewe Road South.

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Site as existing



Site

The site is currently split into two halves buildings and car parking to the south and open space to the north hosting private playing fields. The space to the north is currently zoned as 'Open Space' within the Edinburgh Local Development Plan 2016. The site is used exclusively by Police Scotland.

The topography is largely flat with minimal undulation sloping down towards the south and east. The majority of the site is bounded by natural stone walling, with an open boundary on the eastern side opposite the entrance to the main office building. A wall of approximately 5 metres flanks the site between the Waitrose supermarket and the first site entrance, concealing a secure car park for police and staff vehicles.

Carrington Road and Fettes Avenue are both lined with metered parking.

To the south of the site, a disparate collection of buildings of varying styles, scales, uses and quality completes the 'urban block' in an untidy fashion. There appears to be little or no cohesion or urban structure between any of the structures.

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Access

There is currently no public access through the perimeter of the site. Local pedestrian connections between adjacent areas are taken via Carrington Road, Crewe Road South and Fettes Avenue.

The redevelopment of the site opens up the potential to create new links for walking and cycling and to create a positive, high quality public realm environment.



Existing Buildings

Developed in the 1970s, the main office building at Police Scotland's site at Fettes is a distinctive modernist edifice with a strong horizontal composition of long strip windows and red-brown brick coursing.

The site incorporates further buildings to the rear and centre of the site, housing a separate office, car garaging and the former stable block.

The office building is split into two distinct sections- a 7 storey cubic 'tower' section and a long 4 storey pavilion that stretches from the centre of the site towards the northern boundary on Carrington Road. This long section both reinforces the contextual grid but also prohibits east or west views across the site.

Subject to detailed technical investigation and market appraisals, it may be possible to re-use sections of the existing buildings as part of a wider redevelopment strategy for this site. The existing structure is a concrete frame with a consistent grid of posts along each facade. The overall presumption is that the building will be demolished to make way for a holistic development strategy which could have greater benefit to the city and to the surrounding historic environment.

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1851

Site Context: Historical Maps

Historical maps show the gradual evolution of the area from rural agricultural land in 1851 to semi rural with the development of Fettes College and associated adjacent buildings. The formation of Fettes Road and Inverleith park evolved the agricultural landscape in to a formal grid plan.

Both maps show the site as a former nursery with what we assume to be greenhouse and shed buildings sporadically placed throughout the site. A settlement of buildings, can be seen on the corner where Comely Bank meets Crewe Road South. This includes the three terraced houses- Avenue Terrace, which remain today and are C-listed.



1877

Maps reproduced with the permission of the National Library of Scotland

- Greenhouses and shed structures
- Avenue Terrace- 3no listed terraced dwellings

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Map indicating extent of protected view N1a/b

Site Context: Protected Views

The City of Edinburgh Council's Edinburgh Design Guidance 2017 sets out a series of protected views. This guidance seeks to conserve the unique setting of the city through protecting key views of the city's landmarks and geography.

The subject site lies to the south of Protected view **N1a** Carrington Road- Arthur's Seat and view **N1b** Carrington Road-Charlotte Square Dome Castle and Hub Spire.

The adjacent graphic and photographs taken along Carrington Road (protected View N1) demonstrate the views to the Castle and Arthur's Seat from the northern edge of the site.

View 1 is taken from the north-West corner of the site. The Castle and Arthur's Seat can both be viewed from this position.

View 2 is taken further along the street, approximately a third of the distance from Crewe Road South and Fettes Avenue. At this point only the Castle is visible. Moving east beyond this point, neither the Castle or Arthur's Seat can be viewed as both are obscured by the existing Police Headquarters buildings.

Any future development of the subject site will have to test emerging proposals with the Local Authorities policy of the protection of views and associated local plan policies.

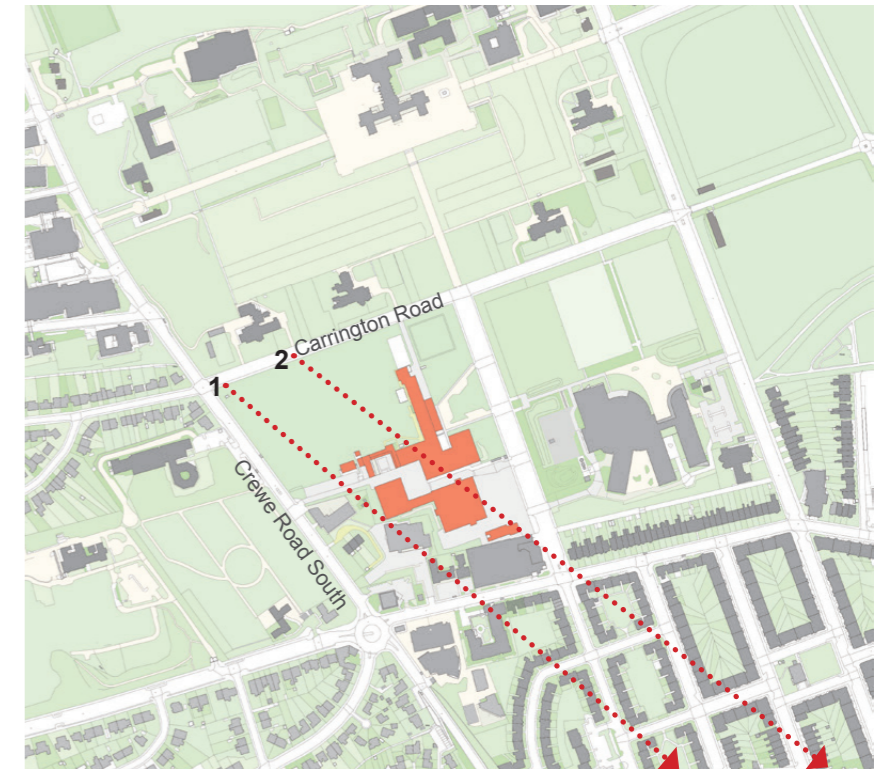


View 1
Taken Approximately 10m from Crewe Road South Junction, beyond the trees at the corner of the site.



View 2
Taken Approximately 100m from the Crewe Road South junction.

Only Edinburgh Castle is visible at this point. Moving east, the castle view disappears behind the Fettes office building.



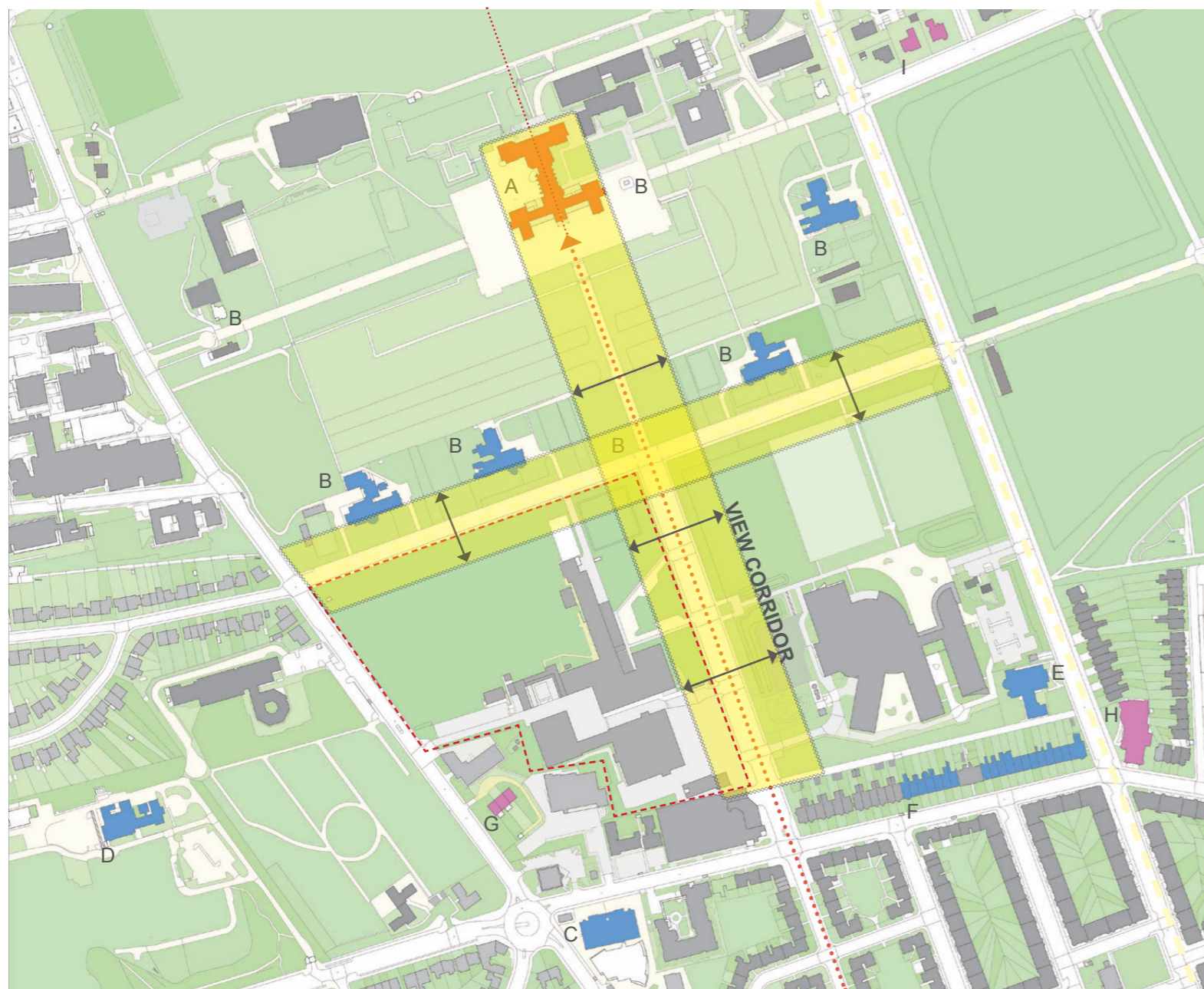
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Site Context: Listed Buildings and Setting

The A listed Fettes College is a significant architectural landmark in the city and lies to the north of the site. Perched on an elevated plinth, its distinct form and roof articulation, in a bold French Gothic style, heroically punctuates the city skyline from distance.

The building is positioned at the termination of Fettes Avenue and can be appreciated along Learmonth Avenue and South Learmonth Avenue to the south. This long axial view terminates to the south as far back as Queensferry Road.

Any future development of the subject site will have to carefully consider the spatial relationships and characteristics of the adjacent environment that are critical to the setting of Fettes College and adjacent listed buildings. New development will have to retain and enhance the setting of the listed buildings and offer a positive contribution to the site and surrounding historical environment.

Key features of setting of adjacent listed buildings include;

- Wide, tree lined boulevard streets with buildings set back from boundaries.
- Street width and spatial relationship affording presence and long views to significant buildings.
- Listed buildings set within grid form street pattern.
- Feeling of open space with long views to the city.
- Linked green spaces with recreation use, playing fields and links to Institutions including the Royal Botanic Gardens and Fettes College.
- Pattern of substantial detached buildings with a variety of uses and styles set within large grounds.
- Long views to Fettes College from southern districts with direct axial view from Learmonth Avenue and Queensferry Road.

Site Context: Listed Buildings

A Listed

(A) Fettes College (David Bryce 1864-70)

B Listed

(B) Fettes College buildings including: Kimmerghame, Carrington, Glencourse and Moredun House, west and south lodges/ gates + war memorial. (C) Flora Stevenson Primary School, (D) Admin Block Royal Victoria Hospital, (E) St Luke's Church, (F) Georgian Terrace no's 4-23 Comely Bank.

C Listed

(G) Avenue Cottages, Crewe Road South, (H) St Stephens Church, (I) Comely Bank Road, no's 94 and 96 Inverleith Place

View from **Queensferry Road** towards Fettes College. Protected view C18 within the local authority design guidance.



The wide view corridor is an essential feature of the setting of Fettes Col-

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Indicative Opportunities Diagram

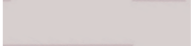







Opportunities

New Development, Spaces and Connections.

Key site opportunities;

1. Provide Edinburgh with a major new high quality, housing-led, mixed-use development opportunity.
2. Situated in the heart of the city, the site has strong connections to existing adjacent residential neighbourhoods, places of work and recreational uses. An opportunity exists to create a cohesive and sustainable urban environment with a strong sense of place.
3. Positively contribute to the local environment with a bespoke, site responsive place-making strategy.
4. Create new links in the city by forming public routes through the site, connecting the development to the surrounding area and
5. Promote a pedestrian priority environment with positive public realm for walking, cycling and active amenity.
6. Provide a sequence of linked spaces that offer different scales, use and character.
7. Consider balance between public and private space and the creation of safe environments.
8. Consider north and east edges as landscaped buffers- positive active spaces/ enhanced planting and trees and development set backs to maintain view corridors. Enhance view corridor of Fettes Avenue with appropriately responsive development.
9. New links and spaces to respond to and utilise the protected views to the Castle and Arthur's Seat and to the spatial grid of the surrounding open environment. From Carrington road, connections should point towards and harness key views of the city landmarks.
10. Creation of efficient and safe vehicular access away from adjacent schools.
11. Promotion of a contextually responsive development that utilises the adjacent grid pattern to inform building lines, spatial structure, planting and connections through the site.

Map Key

-  Redevelopment site
-  Landscaped 'Buffer'
-  Connection Space/ Pedestrian access
-  Space: Different treatments, type and scales.
-  Potential vehicular access
-  Pedestrian connection
-  Vehicular/ pedestrian connections
-  New, positive frontages that respond to immediate context.

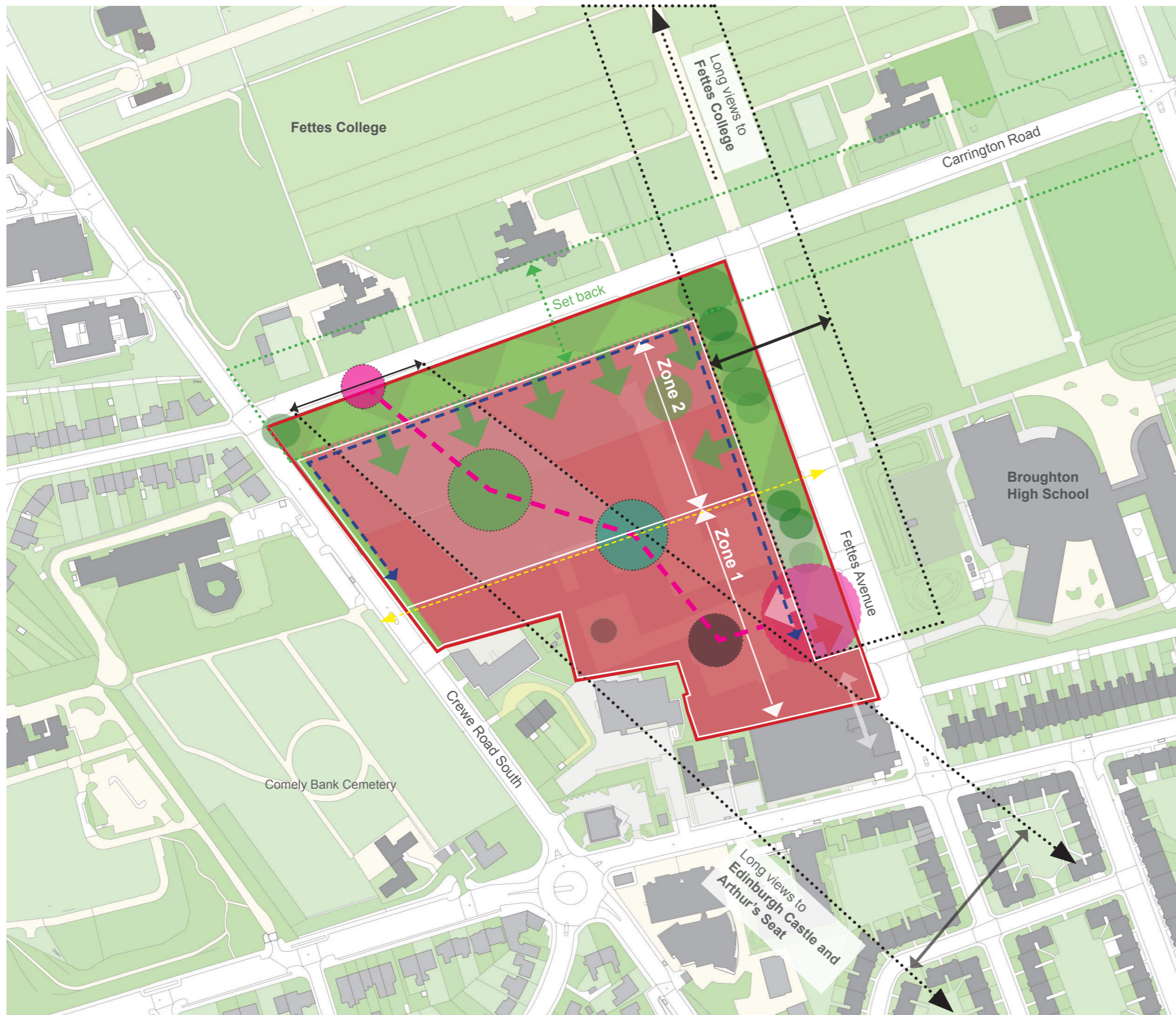
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Indicative Site Development Principals Diagram

Site Development Principles

1. Development to respond to adjacent building lines and grid street pattern. The opportunity exists to provide a more positive frontage onto Crewe Road South, Carrington Road and Fettes Avenue. These development edges could sensitively respond to their specific context and in particular, provide a more befitting frame for the view corridor along Fettes Avenue towards Fettes College.
2. Development massing to correspond with the retention of protected views from Carrington Road.
3. Development to actively contribute to place-making and promote a strong, site specific urban response.
4. Massing and form to respect and enhance the setting of adjacent listed buildings and historical setting.
5. Site split into two separate zones, each responding to immediate context and spatial conditions.
6. **Zone 1: Urban.** Development to key into the urban fabric of city with buildings forming a recognisable urban structure and density.
7. **Zone 2: Transition.** Development to mediate between urban and lower density spatial structures with an appropriate exchange of buildings and spaces that will feather development into landscape. Nb- sensitive approach to context and setting required.
8. Opportunity to connect development to Comely Bank and present a positive solution to the area around Waitrose. Potential to create active public realm at pedestrian entrance to site- shown as pink circle on the diagram.
9. New open space provision to be included within residential development area.
10. Maintain and enhance open spatial characteristics, specifically along Carrington Road and Fettes Avenue and potentially Crewe Road South with landscaped buffer around specific areas of site perimeter. Consider scale relationship and set back distance between listed villas along Carrington Road for any new site development.
11. Enhance/ preserve tree line along Fettes Avenue.

Map Key

- Residential, mixed use development zones. Indicative densities implied by colour depth.
- Landscaped buffer enhancing and maintaining essential characteristics of context and view corridors.
- View Corridor (part of essential character and setting)
- Connection Space/ Pedestrian access.
- Principal space locations: Different treatments, types and scales.
- Opportunity to key into/ mask the rear (north side) of supermarket.
- Main pedestrian connection strategy.
- Principal vehicular access.
- New, positive frontages that respond to immediate context.

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