

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **1 A**

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

Short Response

Explanation

Choice **1 B**

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

Short Response

Explanation

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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

Explanation

Choice 1 D

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

Short Response

Explanation

Choice 1 E

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

Short Response

Explanation

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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

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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

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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 Due to the distinct tenure provision of Inspired Villages for elderly living, accessibility for their residents is at the forefront of their design/layout, and is evidenced in a supporting design and access statement with a planning application. The further densification of development to a minimum 65 units per hectare is ambitious. Based on IV experience to date, maximum density is in the range of 48-50 units per hectare. Increasing density to the suggested level should be an aspiration as opposed to a distinct requirement, dependent upon the circumstances pertaining to each particular site. IV sites are generally situated in sustainable locations within the urban area or the edge of an existing settlement, close to services, local retail provision and public transport corridors.

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 IV will take full account that their developments streets, road layout and sense of place, reflects the Street Design Guidance in Edinburgh and meets the SPP six qualities of a successful place. IV consider these to be fundamental components of their retirement communities, namely;

- Safe (IV staffed 24/7)
- Pleasant (open space/gardens managed by IV grounds staff)
- Easy to move around (accessible for all residents)
- Welcoming (a core principle of an IV community for residents and family)
- Adaptable (concept of being able to age in place for residents)
- Energy efficient (on site energy centre and ground source heat pump)

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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

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 IV recognise that there is a requirement to reduce carbon emissions through both good design and use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and 50% of the carbon reduction target being met through low and zero carbon generating technologies. However, IV believe that emissions standards for new buildings should continue to sit within the building standards regulatory regime and not the planning system, as this causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource. Therefore, apart from an overall CEC view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP. On this basis B-D inclusive are supported, where these matters remain with Building Control of CEC.

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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 The ambition of CEC to have Place Briefs prepared in conjunction with local communities in all new housing sites is a significant increase in consultation requirements, especially for those sites below 2Ha in size and which are not major applications in the planning hierarchy of development. It is considered that Place Briefs are best suited to strategic sites and that education, transport and infrastructure provision is best led by expert advice and evidence. There also requires to be a leading role for landowners and developers in the preparation of Place Briefs.

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 The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPP requires to adhere to the LDP and cannot be used to thwart allocations or development proposals contained in the LDP.

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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 IV concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal. Therefore, as an example, IV would not be undertaking developer contributions for educational infrastructure, due to the age profile of their development.

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

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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 In terms of Healthcare Infrastructure, it is considered that IV significantly reduce healthcare impacts by offering independent living for the elderly. There may be a slight impact on primary healthcare, new residents registering with local GP. In any event the planning of future health care services is a matter the NHS Lothians, any impacts should be proportionate and clearly defined by the NHS to CEC in preparing the LDP. An IV development proposal will take full account of its overall transport impact, staff, deliveries and mitigate accordingly. This would be detailed as a supporting report for a planning application on an IV development site. In the experience of IV to date, their transport impact is far lower than most other developments, due to the age of their residents and generally lower levels of vehicle ownership. IV are situated in locations where there are nearby walking routes, services and public transport provision. An IV development has its own private transport service (minibus and electric vehicle taxi type car) for use by local residents, which further diminishes the developments transport impact on the local transport network.

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Choice 5 D2

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

Short Response

Explanation

Choice 5 E

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

Short Response

Explanation

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 This is covered by IV in the preceding section. IV fully subscribe to creating places for people and not cars, focusing on healthy lives prioritising public transport, walking cycling and reducing levels of private car ownership. The provisions of a private transport service (minibus and electric vehicle taxi type car) for each community assists and car share clubs are being researched as an offer for residents.

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Choice **6 B**

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

Short Response

Explanation

Choice **7 A**

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

Short Response

Explanation IV are committed to reducing private car ownership utilising good public transport options, providing their private transport service, supporting walking/cycling and in future providing access to car clubs. Determining car parking levels based on the area of the city and development type are also important considerations. IV consider that this Choice should be merged with the preceding Choice as there is significant duplication on this subject and a single policy response will be clearer.

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

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On behalf of:

Choice **7 C**

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

Short Response

Explanation

Choice **7 D**

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

Short Response

Explanation

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

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Choice **8 B**

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

Short Response

Explanation

Choice **8 C**

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

Short Response

Explanation

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

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Choice 9 A

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

Short Response

Explanation

Choice 9 B

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

Short Response

Explanation

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

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Choice **10 B**

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

Short Response

Explanation

Choice **10 C**

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

Short Response

Explanation IV support the aim to increase the number of new homes in Edinburgh, with their specific focus on the provision of new homes for the elderly to create sustainable communities. This is directed by SPP paragraph 132, as detailed in an earlier section of this representation. However, the proposals in this scenario for student accommodation set a requirement for mixed uses, which IV believe require to be compatible. Not all student standalone housing sites can provide a variety of other planning uses and tenure types and certainly not elderly living accommodation, these uses are not mutually compatible. IV support the principle of mixed communities on larger sites, with the provision of facilities/services that can benefit the wider community and allow different age groups to interact. IV developments are fully accessible and are not a 'gated' community.

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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 Whilst the Council's aspiration to build 20,000 affordable homes is noted, the aim to increase the affordable housing requirement to 35% from 25% requires to be carefully considered. Addressing affordability will require subsidised affordable housing, but this should not be seen as the only policy lever necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability. Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly produced to support SESplan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh. It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report. IV provide communities and developments with an appropriate level of care or support within the retirement village to meet resident's requirements. This results in their developments being classified under Use Class 8 – Residential Institutions. IV consider their developments to be exempt from the provision of affordable housing as they are not in Use Class 9 – Houses. Class 8 uses, in the experience of IV as a business to date, cannot match housebuilders in terms of land prices. Their net to gross is lower, as up to a fifth of the IV floorspace is non-saleable space (communal facilities). The village centre is provided in Phase One, sales rates are slower than market housing, and cash returns for the business are longer term, which all equates to affordable housing not being viable for a retirement development. The new Planning Act provides for parity in considering older persons accommodation alongside but separately to affordable accommodation, recognising they are distinct and different. No 'Choice' is provided for concerning 'elderly' accommodation. This should form a bespoke and distinct policy in the forthcoming LDP, outlining requirements and the proposals for meeting and delivering this form of accommodation. IV believe the affordable housing threshold should remain at 25% as detailed in the SPP and support continuity, as detailed in section C. The details for provision of this form of housing is supported, as outlined in part B.

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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

Customer Ref: 01695 Response Ref: ANON-KU2U-GWRJ-1
Name: Anthony Aitken
Response Type: Agent / Consultant
On behalf of: Inspired Villages

Supporting Info:
Email: anthony.aitken@colliers.com

Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

There is a recognition by the Council that they need to provide new homes in Edinburgh and allocate land for new homes. IV are of the view that the Council, in accordance with the provisions of the new Planning Act, also require to specifically allocate land for accommodation for the elderly and produce precise policies that enable the delivery of such sites in the future, because retirement community operators in this emerging sector, do not have landbanks or land secured at this stage. Failure to produce positive planning policy now will stymie the potential for growth in the sector over the 10 year plan period. The last approved South East Scotland (SESPlan) Strategic Development Plan (SDP) is dated from 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015). IV support the Council's aim to provide over 20,000 affordable homes to 2032. Choices 2030 sets out two options for a housing target, as follows:

1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.
2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019. Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario. Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention. The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. It is not considered that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030. Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere. IV believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through market housing is a dogmatic approach that does not reflect the collaboration needed, to ensure all tenure provision is provided for in full, in Edinburgh, over the next decade. To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. IV recognise the importance of reusing previously developed land as a key objective of the planning system. However,

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when the Council then outline that to meet their preferred housing requirement they require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned. IV believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents. To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by IV, this equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh. IV believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. IV can provide options for elderly provision in the sites it will advance in Edinburgh. This will be covered in further sections of this submission.

Choice **12 B1**

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

Short Response

Explanation

Choice **12 B2**

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

Short Response

Explanation

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01695

Response Ref:

ANON-KU2U-GWRJ-1

Supporting Info

Name

Anthony Aitken

Email

anthony.aitken@colliers.com

Response Type

Agent / Consultant

On behalf of:

Inspired Villages

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 Yes

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 Yes

Explanation

Choice 12 B5

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

Short Response Yes

Explanation

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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

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

Explanation

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Response Ref:

ANON-KU2U-GWRJ-1

Supporting Info

Name

Anthony Aitken

Email

anthony.aitken@colliers.com

Response Type

Agent / Consultant

On behalf of:

Inspired Villages

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

Choice 12 BX

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

Short Response

Not Answered

Explanation

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Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

Choice 12 C

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

Short Response

Explanation

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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

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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 It is recognised that the area in and around Edinburgh Airport is identified as nationally significant in economic and transport terms, there are strategic land allocations from the current LDP 2016 for growth in this area. There are proposals to build on these allocations through this next LDP and IV support this approach. Indeed, in all strategic allocations in the CEC LDP there should be a requirement for Class 8 Use, as a retirement community, to be provided as part of the mixed use needed for these larger development proposals. This can reflect the requirement that all developers now expect regarding affordable housing, provision of homes for the elderly population is now required in a similar manner.

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

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Choice 14 C

We want City Plan 2030 to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach? - Yes / No

Short Response

Explanation

Choice 15 A

We want to continue to use the national ‘town centre first’ approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this? - Yes / No

Short Response

Explanation Edinburgh fortunately benefits from a healthy range of local, town and thriving city centres. IV support the policy option to seek to strengthen local and town centres, as these are often in sustainable locations with good transport connections that provide a range of goods, services and community facilities. IV developments seek to locate in close proximity to and residents benefit from, interaction with nearby healthy local and town centres. It is considered important that they maintain their vitality, viability and deliver good placemaking.

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Supporting Info

Name

Anthony Aitken

Email

anthony.aitken@colliers.com

Response Type

Agent / Consultant

On behalf of:

Inspired Villages

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

Yes

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

Yes

Explanation

Choice 15 D

We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support? - Yes / No

Short Response

The use of Supple

Explanation

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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

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

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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

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

Customer Ref: 01695 Response Ref: ANON-KU2U-GWRJ-1

Supporting Info

Name Anthony Aitken

Email anthony.aitken@colliers.com

Response Type Agent / Consultant

On behalf of: Inspired Villages

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 Not Answered

Explanation Not Answered

Choice 16 A5

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

Short Response

Explanation

Choice 16 B

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

Short Response Not Answered

Explanation Not Answered

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

Choice **16 G**

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

Short Response

Explanation

Customer Ref: 01695 Response Ref: ANON-KU2U-GWRJ-1

Name: Anthony Aitken

Response Type: Agent / Consultant

On behalf of: Inspired Villages

Supporting Info:

Email: anthony.aitken@colliers.com

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



City of Edinburgh Council Main Issues Report – Choices for City Plan 2030

APRIL 2020

COLLIERS INTERNATIONAL

INSPIRED VILLAGES

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1 INTRODUCTION

1.1 OVERVIEW

Inspired Villages welcome the opportunity to comment on the City of Edinburgh Council Main Issues Report – Choices for City Plan 2030. The consultation period is open until 30th April 2020.

Inspired Villages develop and operate 'Retirement Villages' which provide specialist purpose built housing accommodation for older people. They currently operate six retirement villages in England, with a further 13 sites legally secured and/or under construction. Inspired Villages are looking to expand their business into Scotland. Inspired Villages offer a distinct housing environment with the flexible provision of care and communal facilities, including café/restaurant, library, craft room, hairdressers, wellness centre (including a pool, gym and fitness studio) and treatment rooms. It is the provision of care and/or support within the retirement village provided by Inspired Villages that allows this form of development to be classified under Use Class 8 – Residential Institutions. Inspired Villages are funded by Legal & General.

Through the new Planning Act, which received Royal Assent in July 2019, there is now a distinct requirement for national targets for the provision of housing for older people. Every two years Scottish Ministers are required to report to the Scottish Parliament how the planning system is operating to ensure the housing needs of older people are being met. This is the first time that the needs of older people require to be explicitly addressed directly through planning statute in the UK. Scotland is therefore at the forefront of seeking to actively assess, monitor and deliver older people's living accommodation.

Inspired Villages submission and response to the Choices for City 2030 provides a developers/operator's perspective, as experts in this specific and emerging sector. They seek to offer industry insight at an early stage of the preparation of the new Edinburgh Local Development Plan. The express aim being that bespoke and specific planning policies are drafted and allocations identified, in the forthcoming LDP, to ensure the delivery of accommodation for older people, as required by the new Scottish Planning Act.

2 SCOTTISH PLANNING POLICY (SPP)

2.1 CONTEXT

The purpose of the SPP is to set out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. It is non-statutory, but the SPP is a material consideration that carries significant weight.

The SPP focuses on plan making, planning decisions and development design on the Scottish Government's purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

Scottish Ministers expect the planning service to perform to a high standard and to pursue continuous improvement. The service should:

- focus on outcomes, maximising benefits and balancing competing interests;
- play a key role in facilitating sustainable economic growth, particularly the creation of new jobs and the strengthening of economic capacity and resilience within communities;
- be plan-led, with plans being up-to-date and relevant;
- make decisions in a timely, transparent and fair way to provide a supportive business environment and engender public confidence in the system;
- be inclusive, engaging all interests as early and effectively as possible;
- be proportionate, only imposing conditions and obligations where necessary; and
- uphold the law and enforce the terms of decisions made.

For planning to make a positive difference, development plans and new development need to contribute to achieving a successful, sustainable place by supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places. The SPP introduces a presumption in favour of development that contributes to sustainable development.

2.2 LOCAL DEVELOPMENT PLANS

The SPP sets out the overall aims of the Development plan which should:

- be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
- positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;
- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.

In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

In enabling the delivery of new homes, the planning system should:

- identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;
- enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and
- have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders.

Plans should be informed by a robust housing need and demand assessment (HNDA). This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report). It should produce results both at the level of the functional housing market area and at local authority level and cover all tenures. Plans should address the supply of land for all housing. The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the period of the development plan. The target should be reasonable, should properly

reflect the HNDA estimate of housing demand in the market sector, and should be supported by compelling evidence.

Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.

Local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing.

It is highlighted in paragraph 132 of the SPP that;

“As part of the HNDA, local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for elderly people and those with a disability. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites.”

The SPP aims to cover a range of specialist provision, but does not explicitly reference a retirement community. These are distinct and different to both care homes and sheltered housing, which currently provide the majority of elderly persons homes in Scotland. A retirement community provides accommodation where an individual's independence can be maintained, within their own specifically designed property, with a range of available services and where increasing levels of care can be brought in as needs change. There are a scarce number of retirement communities in Scotland and very few in the UK at present.



There is now a requirement, as detailed by the SPP and also as recorded in the new Planning Act, for the needs of the elderly to be met. Inspired Villages (IV) provide retirement community accommodation that facilitates independent living with the provision of a significant amount of communal facilities on-site and the flexible provision of care to allow residents to age in place. It is also expressly advised that sites of this nature should be specifically allocated in the Local Development Plan. As an emerging sector, IV and other retirement community operators do not have vast land holdings (landbanks) under their control. IV require policy makers, such as City of Edinburgh (CEC), to provide a conducive policy framework to allow retirement communities to be delivered over the LDP period, the next 10 years. This is to meet identified need in this sector as recognised by Scottish Government in the new Planning Act. IV request that CEC follow the SPP requirements in the new LDP and positively plan to deliver elderly persons accommodation.

3 CHOICES FOR CITY PLAN 2030

3.1 CHOICE ONE - EDINBURGH, SUSTAINABLE, ACTIVE AND CONNECTED

A new policy in the forthcoming LDP which takes account of connecting places, parks and greenspaces is supported by Inspired Villages as these contribute to both health and well-being, essential tenants of their business for residents. Encouragement for walking, cycling and sport are generally supported.

In planning for any development, IV recognise the inclusion of green and blue infrastructure, providing appropriate open space, trees and utilising SUDS for their aquatic/ecological habitats and biodiversity.

IV believe that new standards (as alluded to in point E) require to be proportionate and do not all fall on new development proposals to provide. There requires to be a comprehensive audit of existing open space provision throughout the City and only where distinct deficiencies are identified, then a proportionate response is sought via new development, which recognises the proposed use and its impact on green/blue infrastructure.

IV support parts A and B of the choices offered and qualify any support of part E, as detailed above.

3.2 CHOICE TWO – IMPROVING QUALITY, DENSITY AND ACCESSIBILITY OF DEVELOPMENT

IV are committed to any development that they undertake in Edinburgh creating a great new place and contributing to existing communities. They concur that a consistent approach to determining applications for new buildings and places is essential.

Due to the distinct tenure provision of Inspired Villages for elderly living, accessibility for their residents is at the forefront of their design/layout, and is evidenced in a supporting design and access statement with a planning application. The further densification of development to a minimum 65 units per hectare is ambitious. Based on IV experience to date, maximum density is in the range of 48-50 units per hectare. Increasing density to the suggested level should be an aspiration as opposed to a distinct requirement, dependent upon the circumstances pertaining to each particular

site. IV sites are generally situated in sustainable locations within the urban area or the edge of an existing settlement, close to services, local retail provision and public transport corridors.

IV will take full account that their developments streets, road layout and sense of place, reflects the Street Design Guidance in Edinburgh and meets the SPP six qualities of a successful place. IV consider these to be fundamental components of their retirement communities, namely;

- Safe (IV staffed 24/7)
- Pleasant (open space/gardens managed by IV grounds staff)
- Easy to move around (accessible for all residents)
- Welcoming (a core principle of an IV community for residents and family)
- Adaptable (concept of being able to age in place for residents)
- Energy efficient (on site energy centre and ground source heat pump)

IV support parts A and C. Part B on density needs to be aspirational not compulsory and re-written accordingly, failing which, section E, existing densities should be maintained.

3.3 CHOICE THREE – CARBON NEUTRAL BUILDINGS

IV recognise that there is a requirement to reduce carbon emissions through both good design and use of low and zero carbon generating technologies. We note the Council's aim for all buildings in Edinburgh to be zero carbon by 2030 and 50% of the carbon reduction target being met through low and zero carbon generating technologies. However, IV believe that emissions standards for new buildings should continue to sit within the building standards regulatory regime and not the planning system, as this causes needless duplication, when the focus should be on maximising the efficiency of existing planning resource. Therefore, apart from an overall CEC view of seeking to achieve carbon neutral buildings, this should not result in a bespoke planning policy in the LDP.

On this basis B-D inclusive are supported, where these matters remain with Building Control of CEC.

3.4 CHOICE FOUR – CREATING PLACE BRIEFS AND SUPPORTING COMMUNITY LOCAL PLACE PLANS

The ambition of CEC to have Place Briefs prepared in conjunction with local communities in all new housing sites is a significant increase in consultation requirements, especially for those sites below 2Ha in size and which are not major applications in the planning hierarchy of development. It is considered that Place Briefs are best suited to strategic sites and that education, transport and infrastructure provision is best led by expert advice and evidence. There also requires to be a leading role for landowners and developers in the preparation of Place Briefs.

The new Planning Act allows for Local Place Plans (LPP) to be prepared by local communities and set proposals for development of land of particular significance to a local area. However, it should also be highlighted that the LPP requires to adhere to the LDP and cannot be used to thwart allocations or development proposals contained in the LDP.

Therefore qualified support is provided to suggestion A for Place Briefs, if they can take the above comments into account and supporting LPP's as part B, provided they meet with their required parameters.

3.5 CHOICE FIVE – DELIVERING COMMUNITY INFRASTRUCTURE

IV concur with the CEC view that directing development to where there is existing or under-utilised infrastructure is sensible. If new infrastructure is required, improvements are sought and investment needed, then this requires to be guided by Planning Circular 3/2012 – Planning Obligations and the associated tests, in order for a planning agreement (section 75) to be entered into between a developer and the Council. A developer contribution must be proportionate and directly relevant to the development proposal. Therefore, as an example, IV would not be undertaking developer contributions for educational infrastructure, due to the age profile of their development.

In terms of Healthcare Infrastructure, it is considered that IV significantly reduce healthcare impacts by offering independent living for the elderly. There may be a slight impact on primary healthcare, new residents registering with local GP. In any event the planning of future health care services is a matter the NHS Lothians, any impacts should be proportionate and clearly defined by the NHS to CEC in preparing the LDP.

An IV development proposal will take full account of its overall transport impact, staff, deliveries and mitigate accordingly. This would be detailed as a supporting report for a planning application on an IV development site. In the experience of IV to date, their transport impact is far lower than most other developments, due to the age of their residents and generally lower levels of vehicle ownership. IV are situated in locations where there are nearby walking routes, services and public transport provision. An IV development has its own private transport service (minibus and electric vehicle taxi type car) for use by local residents, which further diminishes the developments transport impact on the local transport network.

In this set of choices, IV support sections A,, B, C, D and E.

3.6 CHOICE SIX – PEOPLE NOT CARS

This is covered by IV in the preceding section. IV fully subscribe to creating places for people and not cars, focusing on healthy lives prioritising public transport, walking cycling and reducing levels of private car ownership. The provisions of a private transport service (minibus and electric vehicle taxi type car) for each community assists and car share clubs are being researched as an offer for residents.

IV agree with change A, but qualify any support for change B, as detailed in earlier sections of these representations.

3.7 CHOICE SEVEN – REDUCE CAR USE

IV are committed to reducing private car ownership utilising good public transport options, providing their private transport service, supporting walking/cycling and in future providing access to car clubs. Determining car parking levels based on the area of the city and development type are also important considerations. IV consider that this Choice should be merged with the preceding Choice as there is significant duplication on this subject and a single policy response will be clearer.

Sections A-D inclusive, are supported by IV.

3.8 CHOICE EIGHT – DELIVERING NEW WALKING/CYCLING ROUTES

The aim to provide new walking and cycling routes is laudable. IV believe that a review of the entire cycle/footpath network in the city should be undertaken, where deficiencies or improvements can be identified then these should be highlighted. Any

request for development to contribute to these should be proportionate and relevant to the development proposal, as well as meeting all the tests of Circular 3/2012.

IV back parts A and C, with qualified support for B, as outlined in the preceding paragraph.

3.9 CHOICE NINE – PROTECTING AGAINST LOSS OF HOMES

This is a future policy in the forthcoming LDP to tackle matters relative to short term lets in the City and is not a matter for IV to comment on.

3.10 CHOICE TEN - CREATING SUSTAINABLE COMMUNITIES

IV support the aim to increase the number of new homes in Edinburgh, with their specific focus on the provision of new homes for the elderly to create sustainable communities. This is directed by SPP paragraph 132, as detailed in an earlier section of this representation. However, the proposals in this scenario for student accommodation set a requirement for mixed uses, which IV believe require to be compatible. Not all student standalone housing sites can provide a variety of other planning uses and tenure types and certainly not elderly living accommodation, these uses are not mutually compatible. IV support the principle of mixed communities on larger sites, with the provision of facilities/services that can benefit the wider community and allow different age groups to interact. IV developments are fully accessible and are not a 'gated' community.

IV have no view on parts A and B, conditionally support part B for larger sites, as detailed above.

3.11 CHOICE ELEVEN – AFFORDABLE HOUSING

Whilst the Council's aspiration to build 20,000 affordable homes is noted, the aim to increase the affordable housing requirement to 35% from 25% requires to be carefully considered. Addressing affordability will require subsidised affordable housing, but this should not be seen as the only policy lever necessary to address the issue. The focus requires to be on providing more housing of all tenures. Edinburgh needs to be building more homes of all tenures otherwise, pressures on affordability will continue. If new housing supply continues to be inadequate to satisfy housing need and demand it will continue to place upwards pressure on affordability. Edinburgh has failed to adequately plan to meet the housing need and demand it has itself identified in its own evidence. When housing supply targets were belatedly

produced to support SESplan 1 in November 2014, the 2009-24 target for Edinburgh was just 61% of the figure set out in the Housing Need and Demand Assessment (HNDA, Table 5.1.2). The now abandoned SESPlan 2 only set out to meet 39% of need and demand arising between 2012-30 in Edinburgh.

It is unsurprising, though regrettable that this failure to plan to meet need and demand properly appears to be influencing some of the problems which are identified in the Main Issues Report.

IV provide communities and developments with an appropriate level of care or support within the retirement village to meet resident's requirements. This results in their developments being classified under Use Class 8 – Residential Institutions. IV consider their developments to be exempt from the provision of affordable housing as they are not in Use Class 9 – Houses. Class 8 uses, in the experience of IV as a business to date, cannot match housebuilders in terms of land prices. Their net to gross is lower, as up to a fifth of the IV floorspace is non-saleable space (communal facilities). The village centre is provided in Phase One, sales rates are slower than market housing, and cash returns for the business are longer term, which all equates to affordable housing not being viable for a retirement development. The new Planning Act provides for parity in considering older persons accommodation alongside but separately to affordable accommodation, recognising they are distinct and different.

No 'Choice' is provided for concerning 'elderly' accommodation. This should form a bespoke and distinct policy in the forthcoming LDP, outlining requirements and the proposals for meeting and delivering this form of accommodation.

IV believe the affordable housing threshold should remain at 25% as detailed in the SPP and support continuity, as detailed in section C. The details for provision of this form of housing is supported, as outlined in part B.

3.12 CHOICE TWELVE – BUILDING NEW HOMES AND INFRASTRUCTURE

There is a recognition by the Council that they need to provide new homes in Edinburgh and allocate land for new homes. IV are of the view that the Council, in accordance with the provisions of the new Planning Act, also require to specifically allocate land for accommodation for the elderly and produce precise policies that enable the delivery of such sites in the future, because retirement community operators in this emerging sector, do not have landbanks or land secured at this

stage. Failure to produce positive planning policy now will stymie the potential for growth in the sector over the 10 year plan period.

The last approved South East Scotland (SESPlan) Strategic Development Plan (SDP) is dated from 2013 and does not break down housing requirements by local authority area beyond 2024. The evidence base for this MIR is therefore dated. We do concur that under the circumstances, with SESPlan2 being rejected by Scottish Ministers in 2019, it is reasonable that the Edinburgh target is set using the more updated HNDA 2 (2015).

IV support the Council's aim to provide over 20,000 affordable homes to 2032.

Choices 2030 sets out two options for a housing target, as follows:

1. Preferred Option: 43,400 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.
2. Alternative Option: 52,800 homes between 2019-32, comprised of 20,800 affordable homes and the market output for the HMDA 2 Wealth Distribution Scenario less completions between 2012 and 2019.

Both options fall some way short of meeting housing need and demand in full. The preferred option would meet just 65% of identified need and demand in the HNDA 2 Wealth Distribution Scenario. The alternative option would meet 79% of identified need and demand in the HNDA 2 Wealth Distribution Scenario or 65% of the Strong Economic Growth Scenario.

Choices 2030 and the Housing Study do not adequately justify why housing need and demand cannot be met in full. There is a reference to the other factors involved in setting the housing target in SPP (para. 115), but it is not explained in any detail why a downward adjustment from the HNDA output is considered to be justified. This is an important point given the historic severe undersupply of housing and housing land in Edinburgh and merits further significant attention.

The alternative target of 52,800 homes is discounted because it is argued that the supporting evidence to the HNDA suggested the Strong Economic Growth Scenarios was unrealistic. However, this evidence was produced in 2013 (Oxford Economics reference) and applied to the whole SESPlan region. It is not considered that these conclusions remain relevant to Edinburgh in 2020 or indeed the next decade to 2030.

Taking these factors into consideration we consider that the higher Housing Supply Target (HST) of 52,800 between 2019-32 is the most appropriate target. This equates to approximately 79% of the middle HNDA output. The Edinburgh housing

market has self-containment in moves of between 81% and 90%. 79% is close to the lower threshold, but the unmet need and demand will need to be met elsewhere.

IV believe that the CEC should review the submissions to the MIR and then seek to ascertain how the land required for the full range of housing provision is met. To outline that land will either be provided by the Council and its partners or through market housing is a dogmatic approach that does not reflect the collaboration needed, to ensure all tenure provision is provided for in full, in Edinburgh, over the next decade.

To deliver new homes in the most sustainable manner, CEC have expressed a preferred option of these being delivered by the Council and its partners within the urban area, a brownfield sites approach. IV recognise the importance of reusing previously developed land as a key objective of the planning system. However, when the Council then outline that to meet their preferred housing requirement they require 275 Ha of urban land and that only 11 Ha is currently available for development and the remainder is currently in use as employment land, then the credibility and deliverability of their preferred strategy requires to be significantly questioned.

IV believe that a balanced approach is required with a combination of brownfield and greenfield sites coming forward over the next decade to maximise the prospects of Edinburgh delivering the full range of homes it needs for its residents.

To meet the 52,800 (+ 10% generosity margin = approximately 58,000) unit requirement favoured by IV, this equates to 4,060 units per annum. With a current land supply of just over 30,000 units, historic brownfield completions of 850 per annum, this equates to a further 11,000 homes to 2032, requiring approximately 17,000 homes to be allocated through the release of greenfield land in Edinburgh.

IV believe that this will require deliverable sites from all tenure options to ensure that the housing requirements of the city are met in full. IV can provide options for elderly provision in the sites it will advance in Edinburgh. This will be covered in further sections of this submission.

Older Households

The purpose of a HNDA is to analyse key housing market drivers, past and present in order to estimate future housing need.

The HNDA2 key finding is that population increase in Edinburgh and SESPlan area will be particularly evident in older age groups. In terms of key indicators it is outlined that;

- People aged 65-79 make up 11.6% of the population in the SESplan area
- The population aged 80+ comprises of 19,174 males compared with 34,566 females, which reflects the national picture
- Distribution of the population aged 80+ is broadly: City of Edinburgh – 40%; East Lothian 9%; Fife SESplan 24%; Midlothian 6%; Scottish Borders 11% and West Lothian 10%
- From 2001 to 2011, the population aged 80+ increased by 30.8% in West Lothian, followed by 24.6% in Fife SESplan; 23.2% in Midlothian; 20.2% in East Lothian; 17.4% in City of Edinburgh and 11.3% in Scottish Borders. Overall, this population increased by 20.1% across the SESplan area
- Using the principal projection, population projections show that the older age groups have the most significant projected increases of 62% for those aged 65-79 and 110% for those aged 80+
- Using the principal population projection for the group age 65 to 79, West Lothian is projected to increase most significantly over the period 2010 to 2035 by 80% followed by City of Edinburgh at 66%; East Lothian by 65%; Fife SESplan and Scottish Borders at 53% and Midlothian 52%. Overall there is projected to be a 62% increase across the SESplan area
- Using the principal projection for the group age 80+, West Lothian is projected to increase most significantly over the period 2010 to 2035 by 187% followed by Midlothian at 131%. Scottish Borders is projected to increase by 120%, followed by Fife SESplan at 118%; East Lothian at 111% and City of Edinburgh at 80%. Overall there is projected to be a 110% increase across the SESplan area
- Regarding household composition by household type, there are 199,510 single person households across the SESplan area. 85,770 (43%) are aged 60+ and 42,220 (21%) are aged 75+
- Regarding household composition by household type, of the total households, in City of Edinburgh, 27.2% of households are age 60+; in East Lothian, 37.0% of households are age 60+; in Fife SESplan, 34.1% of households are age 60+; in Midlothian 36.3% of households are age 60+; in Scottish Borders 39.6% of households are age 60+ and in West Lothian 30.1% of households are age 60+
- The number of dwellings provided by councils and RSLs for older people, totalling 12,376 dwellings across the SESplan area at 2012. This is based on a count of very sheltered, sheltered and medium dependency housing

- City of Edinburgh has the highest number of older persons' dwellings (5,487 dwellings) and this provision has increased by approximately 21% since 2002
- In accordance with 2012 based household projections, a 25% increase in household numbers is projected from 2012 to 2037 with the number of households projected to increase from 559,838 in 2012 to 700,389 in 2037
- An ageing population poses particular challenges for the SESplan area and is well documented throughout SESplan HNDA2, with the population of older people growing at a significant rate
- An ageing population has major implications for housing supply as sufficient levels of housing which meets the needs of older people is critical to a shift in the balance of care
- Specialist housing plays an important role in enabling people to live well, with dignity and independently. However there is not an adequate supply of specialist provision across the SESplan area to meet need and demand. There is a need to consider how the private sector will contribute to the delivery of specialist provision in order to ensure that a variety of tenure options are available.

The overall conclusion when reviewing HNDA2 is that housing for the older population, provided for from the private sector is needed to help to provide for needs of this emerging sector.

In summary, IV do not support Choice A that all new homes are delivered on brownfield sites, as this is unrealistic and will fail to provide the homes that require to be delivered in the next decade. Qualified support for a 'blended approach' based on the housing numbers detailed in the preceding paragraphs is the IV position on this important Choice.

3.13 CHOICE THIRTEEN – INNOVATION, UNIVERSITIES AND CULTURE

A policy provision in the LDP that supports social enterprises, start up's, culture, tourism, innovation, learning and a low carbon sector are supported by IV, as these enrich the City.

IV support change A.

3.14 CHOICE FOURTEEN – DELIVERING WEST EDINBURGH

It is recognised that the area in and around Edinburgh Airport is identified as nationally significant in economic and transport terms, there are strategic land allocations from the current LDP 2016 for growth in this area. There are proposals to build on these allocations through this next LDP and IV support this approach. Indeed, in all strategic allocations in the CEC LDP there should be a requirement for Class 8 Use, as a retirement community, to be provided as part of the mixed use needed for these larger development proposals. This can reflect the requirement that all developers now expect regarding affordable housing, provision of homes for the elderly population is now required in a similar manner.

The Choice in section A is backed, and as outlined here, homes for the elderly should form part of all strategic allocations in the CEC LDP.

3.15 CHOICE FIFTEEN – PROTECTING CITY, TOWN AND LOCAL CENTRES

Edinburgh fortunately benefits from a healthy range of local, town and thriving city centres. IV support the policy option to seek to strengthen local and town centres, as these are often in sustainable locations with good transport connections that provide a range of goods, services and community facilities. IV developments seek to locate in close proximity to and residents benefit from, interaction with nearby healthy local and town centres. It is considered important that they maintain their vitality, viability and deliver good placemaking.

IV support parts A-D inclusive of this Choice.

3.16 CHOICE SIXTEEN – DELIVERING OFFICE, BUSINESS AND INDUSTRIAL FLOORSPACE

IV have no comments to offer in this section.

4 SITE SPECIFIC – PRESTONFIELD GOLF CLUB

4.1 CONTEXT

Inspired Villages believe that there is an opportunity for a retirement community development within the landholdings of Prestonfield Golf Club (PGC). This is located within inner south-east Edinburgh, the Newington area of the city, in close proximity to Dalkeith Road (A7) that is one of the main arterial routes into Edinburgh and the City Centre, under two miles away. The area assessed as most suitable by IV, on a provisional basis, is in and around the existing clubhouse and car park, off Prestonfield Road North/Marchhall Road. This would involve an overall land take of 3.25-4 Ha (8-10 acres), although this would be subject to detailed landscape and design considerations.

The golf course extends to approximately 40 Ha (100 acres) overall and is situated in a mature parkland setting. The golf course is located on a former deer estate at the foot of Arthur's Seat and the Salisbury Crags, in close proximity to Duddingston Loch. The golf course is 100 years old and had to previously be modified after its first decade, in the early 1930's, in terms of layout, as the then Corporation of Edinburgh, compulsory purchased land for housing at its southern extent, on the Peffermill boundary.

4.2 PROPOSAL

The aim of IV is to co-exist in a mutually convenient manner and provide the opportunity to protect the long-term future of Prestonfield Golf Course.

The aim will be that IV residents and golf club members can share the communal facilities to each parties benefit, in terms of efficient and financially prudent use of facilities/services. IV provide the communal facilities at the first phase of the development, for the benefit of the first residents onwards. This will typically include café/restaurant, library, craft room, hairdressers, wellness centre (including a pool, gym and fitness studio) and treatment rooms. The bespoke requirements for the golf club members will also be included, locker room (shower/changing facilities), members bar and professional/club shop. The precise detail of these facilities will be agreed between IV and PGC. Essentially this arrangement can ensure that on-going overheads for the golf club are focussed on the golf course going forward and not fixed and expensive infrastructure.

The land take for the IV proposal will require a few existing holes of the golf club to be altered. However, within the existing and extensive area, 100 acres, under the control of the golf club, it is considered that this can be readily accommodated. A pertinent consideration is also that with an elderly membership range, not uncommon these days to most golf clubs, reducing the yardage of the course is also an available option. Again, these are details can be worked out by IV and PGC, but it outlines the practical solutions that are available for future consideration. The golf club has been successfully altered previously, in the early 1930's to accommodate housing for the local authority and then went forward to flourish thereafter. IV consider that there is no reason to doubt that this cannot occur again.

4.3 GREENFIELD SITE ASSESSMENT (CEC HOUSING STUDY 2020 – 2B)

In the CEC Housing Study 2020, which was undertaken as part of the MIR the Council undertook a Greenfield Site Assessment and presented their findings in a matrix format. Red denotes unacceptable 'No', yellow 'Partial acceptability and green 'Yes'. The study examined housing overall, both market and affordable. There is no evidence or reference to the potential for a retirement community being considered. Therefore, IV wish to review the comments in relation to Prestonfield Golf Course, which was site assessment No. 83 (the top row in the Assessment Matrix below) with regard to their retirement community development proposal.

An important point to note at the outset, is that solely 3.25-4 Ha would be required by IV for the retirement community, not the entire extent of the assessed golf club, an important distinction that requires to be considered in this updated assessment.

Assessment Matrix

AREA NAME	SDP3 Strategic Development Areas	10 min walk to local convenience services	10 min walk to employment clusters	Access to wider cycle network	Active travel assessment (overall)	Access to existing public transport	Public transport assessment (overall)	Primary school capacity	Secondary school capacity	Community infrastructure assessment (overall)	landscape character assessment	Green network assessment	Flood risk assessment	SUMMARY
Prestonfield Golf Club	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Cuddington Playing Fields	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Spillwell Playing Fields	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Cuddington Golf Club	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
The Strids	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Hermitage Golf Course	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Wortons Golf Course	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Wortons Mains	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Wortons	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red
Blackford Hill	Red	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red

In reviewing the greenfield assessment criteria, for each section IV will consider their retirement community within each category in the matrix, as follows;

SDA Area

SDP1 SDA AREAS	
<i>Does the site fit within an area identified as a strategic development area?</i>	No – The site is not within an identified SDA.

Whilst it is acknowledged that the site does not lie within a Strategic Development Area, that in itself is not a pre-requisite for a retirement community, as it does not have the same infrastructure impact as market housing. It is understood that the aim of CEC will be to seek to direct the majority of development to an SDA. However, due to the scale of housing required and the fact all tenures require to be provided for, then sites beyond the SDA will also be required. Located within inner south-east Edinburgh, the site is situated within a sustainable area. The site should be considered partially suitable and changed to yellow in the matrix.

Active Travel

ACTIVE TRAVEL	
<i>Does the site support travel by foot to identified convenience services?</i>	Yes – The site is within walking distance of local convenience services.
<i>Does the site support travel by foot to identified employment clusters?</i>	Yes – The site is within walking distance of employment clusters.
<i>Does the site have access to the wider cycle network?</i>	Yes – The site has access to the wider cycle network.
<i>Can the site support active travel overall through appropriate intervention?</i>	Yes – The site supports active travel overall. Limited points of walking access to the site and links to the Innocent Railway cycle path should be addressed through masterplanning.

Due to the sites sustainable location within the City, PGC scores well (green = yes/acceptable) in each active travel category. Using a small part of the landholding, under 10%, as a retirement community will have greater relevance to certain active travel requirements, access to convenience services/cycle network, than others, employment clusters.

Public Transport

PUBLIC TRANSPORT	
<i>Does the site support travel by public transport through existing public transport network accessibility and capacity?</i>	No – The site does not support travel by public transport based on existing or incrementally improved provision.
<i>Is the site potentially served by an identified public transport intervention project which is deliverable in the plan period to serve and accommodate development?</i>	Partially – The site has limited support for travel by public transport based on an identified major intervention deliverable within the plan period. This intervention would serve the wider south-east corridor of the city along Old Dalkeith Road and improve accessibility from this area.

COMMUNITY INFRASTRUCTURE

In terms of the existing public transport network, the location of the potential retirement community at the current club house/car park area, it is a short distance to Dalkeith Road (A7) and bus stops (Marchhall Place) going into and out of Edinburgh City Centre on both sides of the road. Services include Borders Buses no.2 and Lothian Buses 14, 30, 33, and N14 (nightbus). The site is comfortably within the 400m acceptable 5-10 minute walking distance to these bus stops, probably 250m or thereabouts.

The site accords with the recommended 'walkable neighbourhood' guidelines outlined within the Designing Streets publication (Scottish Government, 2010) and IV consider that the score for the extent to which the site supports travel by public transport in terms of access and capacity should be green to acknowledge the high level of connectivity that the site demonstrably benefits from.

Community Infrastructure

COMMUNITY INFRASTRUCTURE	
<i>Does the site have sufficient primary school infrastructure capacity to accommodate the development without further intervention?</i>	No – The site does not have sufficient primary school infrastructure capacity.
<i>Does the site have sufficient secondary school infrastructure capacity to accommodate the development without further intervention?</i>	No – The site does not have sufficient secondary school infrastructure capacity.
<i>If either do not, can capacity be improved by an appropriate intervention deliverable in the plan period?</i>	Partially – The site does not have sufficient community infrastructure capacity to support development but this can be addressed through the extension of Prestonfield Primary School, subject to a feasibility study, and the delivery of additional capacity through the expansion strategy of the new Castlebrae High School.

As a retirement community, the IV proposal has no impact on either primary or secondary school provision, in this regard both these metrics should be changed to green for our client's proposal. This in turn also changes the third assessment criteria from yellow to green in the matrix.

Landscape & Flooding

LANDSCAPE CHARACTER	
<i>Would development of the site maintain the identity, character and landscape setting of settlements and prevent coalescence?</i>	No – No scope is identified here due to the number of landscape constraints on the site, and its contribution to the setting of the city adjacent to Holyrood Park.
GREEN NETWORK	
<i>Would development of the site avoid significant loss of landscape-scale land identified as being of existing or potential value for the strategic green network?</i>	No – The site is of value for the strategic green network, due to lying within an area identified as a green network opportunity in Edinburgh itself. The site designated as open space, currently contributes to the unbroken landscape scale multi-functional green network stretching from Midlothian to Holyrood Park and is in active use for recreation as a golf club.
FLOOD RISK	
<i>Would development of the site avoid identified areas of 'medium-high flood risk' (fluvial) or areas of importance for flood management?</i>	Partially – Approximately half of the site to the east is covered by an area of medium-high flood risk and an area of importance for flood management.

As outlined at the beginning of this section, a small part of the PGC landholding is being promoted for a retirement community, under 10% of the entire landholding and

the area closest to the existing urban area and set against the backdrop of the Edinburgh University Pollock Halls of Residence, which extend to several stories and provide a harsh urban edge to the built limit. It is considered that a landscape led development that seeks to consider the landscape impact of the development proposal from the outset and influence the built form accordingly, can be provided in this location. This does not compromise the setting of this site as an important part of the city, adjoining Holyrood Park. In this regard it is considered that this section should provisionally be changed from red to yellow and with the correct supporting information and considered approach to landscape design, ultimately the aim of IV would be turn this metric green.

In terms of Green Network, the overwhelming majority of the site 90%, will still be utilised actively as a golf club and will still provide an unbroken landscape green network from Midlothian to Holyrood Park. It is considered that in view of the size of our clients development, under 10% of the landholding, that this metric should change again from red to yellow.

A detailed Flood Risk Assessment for the site will outline and quantify any potential flood risk and mitigate this accordingly, in accordance with SEPA guidelines. It is noted that the comments refer to the east of the golf club. The potential retirement community is located in the western part of the PGC landholdings. Taking this matter into account the metric should change, for the IV proposal from yellow to green.

Assessment Criteria	Prestonfield Golf Club
SDP1 Strategic Development Areas	
10 minute walk to local convenience services	
30 minute walk to employment clusters	
Access to wider cycle network	
Access to existing public transport	
Public transport assessment overall	
Primary School capacity	
Secondary School capacity	
Community Infrastructure Assessment overall	

Landscape character assessment	
Green Network Assessment	
Flood Risk Assessment	
Summary	

Therefore overall, the bespoke proposal when assessed against the CEC matrix compiled, it scores a high number of green 'Yes' and yellow 'Partial' acceptability. With no red 'No' that cannot be addressed. In summarising these results overall, the site is suitable for development for a retirement community of up to 4Ha, provided that the landscape impact and green network considerations are carefully dealt with from the outset. A well-designed landscape led masterplan for the built development proposed and outlining how the future alterations to the golf course can be accommodated, will allay concerns regarding an allocation at this landholding.

4.4 ALLOCATION

IV are expressly seeking that the CEC LDP allocates a retirement community in the grounds of the existing Prestonfield Golf Club. The area required is 3.25-4 Ha. IV request that CEC respond positively in the forthcoming LDP to the requirements in the new Planning Act for homes for the elderly to be planned for and provided. This needs to occur via a proactive policy framework and allocations by CEC, as IV or any other retirement home operator, do not have vast tracts of land (landbanks) under their legal control within Edinburgh. In simple terms, the distinct need for this emerging sector, elderly living, requires to be positively planned for in the new LDP for the next decade.

An allocation can expressly state that the design details and precise boundaries will be determined by a landscape led masterplan and Planning Permission in Principle (PPiP) application. The former will detail the development area and the manner via which the golf course will be catered for and an 18 hole golf course still being available at PGC, for the members and visitors alike.

As outlined in the earlier sections of this representation, IV believe that greenfield land release will be required to allow CEC to meet its housing requirements in full and deliver the homes needed across a range of tenures in Edinburgh during this decade. There will be a requirement for a green-belt review to amend its boundary to accommodate the retirement village. It is considered that a comprehensive city

wide green belt review is a pre-requisite document, upon which allocations can be undertaken and the LDP informed for statutory consultation.

IV would be pleased to work with CEC to consider the precise boundaries of a retirement community at Prestonfield.

Any planning application coming forward would be supported by the following documents;

- Landscape Visual Impact Assessment (LVIA)
- Design and Access Statement
- Phase One Ecological Survey and associated species surveys
- Archaeology Heritage Statement
- Ground Conditions Assessment & Geotechnical Report
- Flood Risk Assessment
- Infrastructure (water/drainage plan/sud's) & Services Report
- Arboricultural Survey and Management Plan
- Transport Assessment
- Planning Statement
- Sustainability Statement
- Pre-application Consultation Report
- Layout Plan, elevational details of built form and cross sections
- Landscape & Maintenance Plan

It is respectfully requested that CEC allocate a 3.25-4Ha landholding at Prestonfield Golf Course for a retirement community. This will provide a site for elderly living accommodation, as sought by the Scottish Government and will also protect the future of PGC.

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