

Customer Ref: 00018 Response Ref: ANON-KU2U-GWMQ-3
Name: Derek Scott - Derek Scott Planning
Response Type: Agent / Consultant
On behalf of: Juniper Residential Limited

Supporting Info: Yes
Email: enquiries@derekscottplanning.com

Choice 1 A

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

Short Response: Not Answered

Explanation: Not Answered

Choice 1 B

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

Short Response: Not Answered

Explanation: Not Answered

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **1 C**

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

Short Response

Explanation

Choice **1 D**

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

Short Response

Explanation

Choice **1 E**

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

Short Response

Explanation

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

Supporting Info

Email

Choice **1 F**

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

Short Response

Explanation

Choice **1 F**

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

Short Response

Explanation

Choice **1 G**

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

Short Response

Explanation

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

Supporting Info

Email

Choice **1 H**

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

Short Response

Explanation

Choice **2 A**

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

Short Response

Explanation

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

Customer Ref: Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice **2 C**

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

Short Response

Explanation

Choice **2 D**

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

Short Response

Explanation

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

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

Supporting Info

Email

Choice **4 A**

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

Short Response

Explanation

Choice **4 B**

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

Short Response

Explanation

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **5 B**

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

Short Response

Explanation

Choice **5 C**

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

Short Response

Explanation

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

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

Supporting Info

Email

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

Supporting Info

Email

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Supporting Info

Email

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

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

Customer Ref: 00018 Response Ref: ANON-KU2U-GWMQ-3

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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 Not Answered

Explanation Not Answered

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Supporting Info: Yes

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Choice 12 A

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

Short Response: Option 3 (Blended)

Explanation

Release of Greenfield land essential to provide for housing needs
 Our Ref: ep636/let001/DS28th April 2020 City of Edinburgh Council Planning Department (Local Development Plan) Waverley Court 4 East Market Street Edinburgh EH8 8BG Dear Sir/Madam, CHOICES FOR CITY PLAN 2030 – REPRESENTATIONS ON BEHALF OF JUNIPER RESIDENTIAL LIMITED IN RESPECT OF LAND LYING TO THE SOUTH WEST OF THE JUNCTION OF LIBERTON DRIVE AND ALNWICKHILL ROAD, EDINBURGH 1.

We write on behalf of our client, Juniper Residential Limited, who have an interest in land lying to the south west of the junction of Liberton Drive and Alnwickhill Road, Edinburgh as outlined in red on the location plan attached as Document 1. 2. Juniper Residential Limited (Juniper Residential) – Juniper Residential forms part of the award winning Cruden Group, one of Scotland’s largest privately-owned development and construction companies. Established in 1943 and with over 600 employees they have delivered, in recent years, more than 1500 homes per annum across a variety of market sectors. Juniper Residential was formed in 2018 with the aim of providing well-designed and carefully considered bespoke retirement housing that fully compliments the environmental setting in which they are situated. The company are committed to providing their customers with a home that provides the quality, security and environment suited to the demands of the evolving retirement lifestyle. 3. Edinburgh Local Development Plan 2016 – The existing local development plan which was adopted in 2016 allocates the Liberton Drive site within the Green Belt and within a Special Landscape Area (Braids, Liberton and Mortonhall). Our client wishes to have the land removed from the Green Belt/Special Landscape Area and rezoned for the development of retirement housing for the over 55s (sheltered accommodation) in the next Local Development Plan. 4. An Ageing Population - Scotland’s population is growing and ageing. Edinburgh as a sub-section of the national situation is no exception to this general trend. As noted in the table below, extracted from Population Projections for the National Records of Scotland (2016 based figures), the proportion of the City’s population of pensionable age and over (65+) is projected to increase by 32.3% by 2041 with the proportion of those aged 75 and over projected to increase by 77.7 % in the same period.

Pensionable Age and Over (65+)	Aged 75 and Over
2021	2021
2026	2026
2031	2031
2036	2036
2041	2041
2021	2026
2026	2031
2031	2036
2036	2041

3.9% 5.8% 12.7% 24.2% 32.3% 4.8% 22.3% 37.0% 56.9% 77.7%

Table – Projected percentage change in population (2016 based) – City of Edinburgh Council Area

5. The new Planning (Scotland) Act 2019 has introduced Section 3CD ‘Duty of Scottish Ministers to report on housing needs of older people and disabled people’ requiring Scottish Ministers, after the end of each two year period, to lay before the Scottish Parliament a report on how the planning system is operating to help ensure that the housing needs of older people and disabled people are met. The report must contain information setting out how the planning system is operating to ensure that new housing meets the needs of older people and disabled people is constructed and how existing housing is being adapted. It should also report on the extent to which any other actions taken by Scottish Ministers in relation to the planning system are meeting the housing needs of older and disabled people and any other matters relevant to meeting their needs. 6. It is clear from the above that the Scottish Government are making the provision of housing for the elderly one of its key priorities; stemming from which Local Authorities will have to consider this and themselves take steps to ensure that the housing needs of the elderly are being met and appropriately provided for. ‘Our society has built very few new homes specifically to meet the needs and aspirations of our ageing population. Without addressing this, most of us will stay in properties that may well

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On behalf of: Juniper Residential Limited

become hard to maintain, may be inaccessible, create worries for sons and daughters or exacerbate loneliness. In old age, housing is not just about having a home, it is about maintaining independence often with declining health.' Lord Best OBE Chairman of HAPPI (The Housing our Ageing Population: Panel for Innovation) 7. Whilst there is a general acknowledgement within the various documents published in association with the Main Issues Report that Edinburgh will experience a significant growth in its elderly population, it is notable that the Choices for City Plan 2030 Document has not presented any specific proposals for the provision of housing for the elderly in the City; focusing instead on General Needs Market Housing, Affordable Housing, Student Housing and the change of use from housing to other uses (e.g. short term holiday lets). In our client's view, supported by Section 3CD of the new Planning (Scotland) Act 2019 referred to previously, the emerging local development plan must address the demographic imperative of an ageing population and an existing housing stock that is ill equipped to deal with its needs. 8. Liberton Drive - The subject site being promoted for the development of retirement housing in this instance is located immediately to the south west of the junction of Liberton Drive and Alnwickhill Road and comprises 3.35 hectares (8.28 acres) of unused agricultural land as outlined in red in Document 1. The land rises very gently to the south from a post and wire fence that extends along its northern boundary, at the rear of the footpath on the south side of Liberton Drive. A similar fence extends along its eastern boundary, adjacent to Alnwickhill Road where a single storey house and garden form an inset to the site. A belt of trees has been established on a 1-2 metre high embankment, along the southern boundary of the site. To the west of the site exists the walled garden and driveway to Liberton House which is a Listed Building. Beyond Liberton House there exists the Braid Hills Care Home, Tower Farm Riding Stables and the Braid Hills Golf Centre. Predominantly two storey houses on the northern side of Liberton Drive and eastern side of Alnwickhill Road overlook the site. Agricultural land exists beyond the southern boundary. 9. The Proposed Development – Our clients propose to develop the site for the provision of retirement accommodation (sheltered housing) which would take the form of predominantly one and two bedroom properties. Whilst Scottish Planning Policy (SPP) and existing Local Development Plan Policy (Policy HOU 6 - Affordable Housing and supporting text) clearly state, that 'where planning permission is sought for specialist housing, an affordable housing contribution may not always be required', our clients are proposing that at least 35% of the units proposed are delivered within an affordable tenure. They are able to include an affordable retirement element in this location as they already own the site resulting in a more viable scheme than would otherwise be the case but still on the proviso that all of the following considerations are met: • The affordable housing must have separate access/egress arrangements and be provided with separate allocated parking; and • It must sit within its own amenity and communal space both within the building and externally. (RSL's not prepared to pay high service charges associated with private retirement schemes) It is important to note that it will not be possible to provide affordable housing in association with all retirement schemes as both Scottish Planning Policy and the Council's existing local development plan accept. 10. In addition to the above our clients are also prepared to provide land for and make a contribution towards the construction of a community facility and will consult and engage with local residents on the nature of that facility. It is also envisaged that a significant part of the site would be reserved for open space to be used for active recreational purposes and which would complement rather than compete with the existing facilities at Liberton Park to the east. 11. The Liberton Drive site is considered to be well located for the development of retirement accommodation due to its close proximity to a range of facilities considered essential to help maintain an older person's independence and well-being. In addition to those facilities described in Paragraph 8 previously, attention is also drawn to the site's proximity to Liberton Brae to the east where there are a range of local shopping and other facilities and to an excellent bus based public transport system from which all parts of the city can be easily accessed. 12. Planning History – The Liberton Drive site has been promoted for housing development on a number of occasions in the past. Most recently it was promoted for housing development and associated open space through the processes associated with the existing Edinburgh Local Development Plan adopted by the Council in 2016. The appointed Reporters who considered objections made to that plan made the following comments in concluding that the site should remain in the Green Belt. • The site would be out of character with the surrounding area

Customer Ref: 00018 Response Ref: ANON-KU2U-GWMQ-3

Supporting Info Yes

Name Derek Scott - Derek Scott Planning

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Response Type Agent / Consultant

On behalf of: Juniper Residential Limited

which has a distinctly rural character. • The partial development of the site would continue to introduce urban residential development to the detriment of the City's open southern skyline. • The proposal would partly enclose the remaining open aspect of Liberton House and its walled garden which would no longer read as singular landmark features within a rural landscape setting. • The open aspect to the south of Liberton Drive and west of Alnwickhill Rd, establishes clear separation between the city and open countryside of the Braid Hills, whilst permitting views across the landscape. • Development of the site, whilst retaining partial views across the site, would be likely to result in cumulative erosion of the integrity of the green belt in this location.¹³ Whilst the above conclusions are noted, it is important to recognise and to give due cognisance to the fact that the Liberton Drive site has been favourably considered by Scottish Government Reporters for release in earlier local plan reviews, albeit, at a time when such decisions were not binding on the Council. Key points to note from the earlier period referred to include, inter-alia, the following: • The Reporter at the 2003 South East Edinburgh Local Plan (SEELP) Inquiry found and recommended that the site should be released from the Green Belt concluding that the existing green belt – the fence-line along Liberton Drive and Alnwickhill road boundary was not particularly strong. In contrast, he concluded that the boundaries to the south and west, including the tree planting and Liberton House could form strong and defensible green belt boundaries. • A similar view about the south and west boundaries of the site was also taken by the Reporter at the 1991 SEELP Inquiry. At that time there was a stone wall along the roadside edge of the site. It was concluded that this provided a good green belt boundary, but it was also considered that tree planting to the west and south would satisfactorily contain the development and create defensible new green belt boundaries. • The Edinburgh Green Belt Boundary Study of 1999 also identified the existing green belt boundary around the site as being weak. The report advised that where existing boundaries were found to be weak they should either be strengthened, for example through planting or be relocated to a new defensible line by extending or cutting back to a new defensible line. • With regard to 'landscape setting', the Reporter at the 2003 Inquiry concluded that the allocation of this site would not affect the continuous green belt around the city. Whilst he concluded that development on the site would be visible from various locations on the higher ground to the south of the site, such as the Braid Hills and Stanedykehead it would be substantially screened by the woodland along the southern and western boundaries of the site. He further concluded that the greatest impact would be on views from Liberton Drive and Alnwickhill Road, where houses on the site would be visible in the foreground and most of the view to the attractive countryside beyond. However he considered that view to be, very much restricted by the woodland along the southern boundary of the site and would become more restricted over time as these trees grow. • The Reporter at the 2003 Inquiry also concluded that the tree belt and the trees in the grounds of Liberton House would provide a backdrop to enable the landscape to absorb low rise family housing, that such development would not significantly adversely affect long range views and could, with appropriate additional landscaping, further strengthen the southern boundary of the site while at the same time having only minimal impact on the landscape setting of this part of the city. • The Reporter to the 2003 SEELP Inquiry concluded that the area of the green belt to the west of Liberton House to be essentially urban in character and clearly not in keeping with the rest of the AGLV (Area of Great Landscape Value). He pointed out that Circular 2/1962 makes clear that an area proposed for an AGLV has to be considered in context and highlighted that the Liberton Drive site is more or less cut off from the remainder of the AGLV and cannot be said to form an integral part of a rugged hill landscape, as described in the EGBBS (Edinburgh Green Belt Boundary Study). He concluded that the site should be removed from the AGLV and that the boundaries of the AGLV should be redrawn to exclude the adjacent commercial areas. • The Council itself proposed housing development on the site in the Finalised Draft SEELP 1986. The Local Plan included a Development Brief for the proposed housing development, which included a brief description and indicative layout. The text specifically referred to landscape measures to be carried out along the western boundary to contain the development and "safeguard the setting of Liberton House."

14. It is difficult to reconcile the comments made by the Reporters in the 1991 and 2003 Local Plan Inquiries with those made by the Reporters assessing

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Response Type Agent / Consultant

On behalf of: Juniper Residential Limited

objections to the existing Edinburgh Local Development Plan which was adopted in 2016. However it is important to recognise that clear differences of opinion on the development merits of this site have emerged through the passage of time with some Reporters considering it appropriate for development and others not being so positively disposed. 15. Setting the planning history aside we are very firmly of the view that the urban structure of the site, as presently existing, when viewed in conjunction with existing development to the west of the site, is ill defined. Appropriately designed development including the provision of a strong edge along Liberton Drive, would simplify the landscape character of the area and would remove some of the visual confusion currently experienced when driving along Liberton Drive. Established views to the hills are already partly lost as a result of the landscape change that has occurred over the last 20 years, particularly the maturing of the woodland belt and the trees in the grounds of Liberton House, and will eventually be lost even without the development. Appropriately designed development on the site, would, in our opinion, as it has done so in the opinion of others before, provide a stronger urban edge and a more understandable transition from the urban to rural landscape. 16. City Plan 2030, Housing Study - The site at Liberton Drive has been assessed in the Council's Housing Study (January 2020) which forms a background report to the Main Issues Report (City Plan 2030). The Housing Report assesses the merits of the site against a range of criteria under the headings of Active Travel, Public Transport, Community Infrastructure (Schools), Landscape Character, Green Network and Flood Risk. It concludes that the site is not suitable for development due to its poor community infrastructure capacity, prominent landscape character and contribution to the strategic green network. 17. Community Infrastructure – The Community Infrastructure Criterion relates exclusively to education capacity. As the site at Liberton Drive is being promoted for a sheltered housing proposal which will be occupied by the over 55s it will cause no impact whatsoever on community (education) infrastructure. Landscape Character – Issues relating to landscape character have been addressed previously in Paragraphs 11-14 above. We are of the view, supported by the Reporters who assessed objections to the 1991 and 2003 South East Edinburgh Local Plan Inquiries that the site being promoted for a low rise retirement housing scheme can be developed without adverse impact on the character or landscape setting of the City or without adverse impact on the setting of the listed Liberton House. Green Network – The Council's assessment claims that the lands to the south of Liberton Drive are currently used as open space (partly) and that they contribute to the unbroken landscape scale multi-functional green network stretching from Midlothian to Blackford Hill. Whilst some of these comments may be correct insofar as they relate to the area to the south of the site being promoted, they are entirely incorrect insofar as they relate to the site itself. Firstly, the site being promoted is set-aside agricultural land and is not used either in full or in part as open space. Secondly, the site does not, even by the wildest stretch of the imagination form a multi-functional green network stretching from Midlothian to Blackford Hill. With the exception of those lands to the south, the site is bounded by built development on all sides. 17. Zoning Request - The following considerations add support for the identification/zoning of the lands for retirement housing purposes in the emerging local development plan:

- The population of Edinburgh is ageing with substantial increases in the retirement and over 75 age groups forecast. The emerging local development plan must address the demographic imperative of an ageing population and an existing housing stock that is ill equipped to deal with its needs.
- There are a number of benefits associated with the provision of housing for the elderly (sheltered accommodation) on the site. - It will contribute to housing supply in the local housing market by providing desirable downsizing options for elderly residents thus addressing issues associated with under occupation and the freeing up of family homes for younger people in need of them. - Occupiers of sheltered housing developments report huge health benefits: including improvements to their quality of life generally; fewer visits to health professionals; and quicker recovery times following hospital stays. - A higher quality of life for residents and their families. - Greater security and convenience, and reduced feelings of isolation and vulnerability. - Improved independence, well-being and health. - Environmentally better than traditional housing, with reduced energy use, including less travel. - Sustains local shopping and other services, helping to sustain local communities. - Private rather than public – its provision entails no cost to the public purse. - Most residents have family and friends in the locality. Older people form an important part of the core

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of most communities with the Liberton Area being no exception. Whilst adapting housing or new build (mainstream) to Housing for Varying Needs provides specialized accommodation - this does not address the issue of isolation and loneliness which contribute greatly to adverse health in older people. Retirement living is managed and provides communal facilities that encourage a sense of community within the development. • The site at Liberton Drive is suitably located for the provision of elderly housing in that it benefits from easy access to a range of facilities and services including public transport provision with bus routes existing along Liberton Brae and Liberton Gardens to the east. • The development of the site for retirement accommodation places no burden whatsoever on the Council's education infrastructure. • Given the extensive landscaping belt existing along the southern boundary of the site, combined with existing topographical considerations and proposed additional planting; the site can be visually contained, appear as part of the urban area and in the process contribute to the landscape setting of the city. • The site, in itself, does not act as a buffer preventing the coalescence of Edinburgh with any other built up area and if removed from the Green Belt and designated for residential purposes (retirement accommodation) does not lead to the erosion or loss of a significant area of open space contributing to the purposes of green belt designation. • The site is capable of accommodating a residential development of the nature proposed without adverse impact on the setting of the listed Liberton House which can be protected and preserved with appropriate planting and landscaping proposals. • The site has been favourably considered for development as part of the processes associated with earlier local plan reviews with Reporters suggesting that its release (on two occasions in the past) would contribute to rather than detract from the character and appearance of the landscape. In view of the considerations outlined above, it is respectfully requested that the site, as outlined in red in Document 1 is (a) removed from the Green Belt; (b) removed from the Special Area of Conservation; and (c) zoned for sheltered housing development (retirement housing) in the next local development plan prepared for the City. Please acknowledge receipt and registration of these representations at your earliest convenience. Please also note that we have no objection to the representations being made publicly accessible. Yours faithfully
Derek Scott
Derek Scott Planning
21 Lansdowne Crescent
Edinburgh EH12 5EH
0044 (0) 131 535 1103 - T0044 (0) 131 535 1104 - F0044 (0) 7802 431970 – Malso at Unit 9 Dunfermline Business Park Izatt Avenue Dunfermline KY11 3BZ 0044 (0) 1383 620 300 - T0044 (0) 1383 844 999 - F0044 (0) 7802 431970 - M enquiries@derekscottplanning.com – E www.derekscottplanning.com - W

Choice 12 B1

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

Short Response Not Answered

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 B2**

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

Short Response

Explanation

Choice **12 B3**

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

Short Response

Explanation

Choice **12 B4**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 B5**

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

Short Response

Explanation

Choice **12 B6**

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

Short Response

Explanation

Choice **12 B7**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

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

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

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

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **12 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

Choice **13 A**

We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No

Short Response

Explanation

Customer Ref: 00018 Response Ref: ANON-KU2U-GWMQ-3
Name: Derek Scott - Derek Scott Planning
Response Type: Agent / Consultant
On behalf of: Juniper Residential Limited

Supporting Info: Yes
Email: enquiries@derekscottplanning.com

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

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: Not Answered

Explanation: Not Answered

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 15 A

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

Short Response

Explanation

Choice 15 B

New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree? - Yes / No

Short Response

Explanation

Choice 15 C

We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree? - Yes / No

Short Response

Explanation

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

Supporting Info

Email

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand. Do you agree with this approach? - Yes / No

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A1**

We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree? - Yes / No

Short Response

Explanation

Choice **16 A2**

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

Short Response

Explanation

Choice **16 A3**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 A4**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Choice **16 A5**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 B**

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

Short Response

Explanation

Choice **16 C**

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

Short Response

Explanation

Choice **16 E1**

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

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E8

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

Short Response

Explanation

Choice 16 EX

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

Short Response

Explanation

Choice 16 F

We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree? - Yes / No

Short Response

Explanation

Customer Ref: Response Ref:

Supporting Info

Name

Email

Response Type

On behalf of:

Choice **16 G**

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

Short Response

Explanation

Choice **16 H**

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

Short Response

Explanation



Our Ref: ep636/let001/DS

28th April 2020

City of Edinburgh Council
Planning Department (Local Development Plan)
Waverley Court
4 East Market Street
Edinburgh
EH8 8BG

Dear Sir/Madam,

CHOICES FOR CITY PLAN 2030 – REPRESENTATIONS ON BEHALF OF JUNIPER RESIDENTIAL LIMITED IN RESPECT OF LAND LYING TO THE SOUTH WEST OF THE JUNCTION OF LIBERTON DRIVE AND ALNWICKHILL ROAD, EDINBURGH

1. We write on behalf of our client, Juniper Residential Limited, who have an interest in land lying to the south west of the junction of Liberton Drive and Alnwickhill Road, Edinburgh as outlined in red on the location plan attached as **Document 1**.
2. **Juniper Residential Limited (Juniper Residential)** – Juniper Residential forms part of the award winning Cruden Group, one of Scotland’s largest privately-owned development and construction companies. Established in 1943 and with over 600 employees they have delivered, in recent years, more than 1500 homes per annum across a variety of market sectors. Juniper Residential was formed in 2018 with the aim of providing well-designed and carefully considered bespoke retirement housing that fully compliments the environmental setting in which they are situated. The company are committed to providing their customers with a home that provides the quality, security and environment suited to the demands of the evolving retirement lifestyle.
3. **Edinburgh Local Development Plan 2016** – The existing local development plan which was adopted in 2016 allocates the Liberton Drive site within the Green Belt and within a Special Landscape Area (Braids, Liberton and Mortonhall). Our client wishes to have the land removed from the Green Belt/Special Landscape Area and rezoned for the development of retirement housing for the over 55s (sheltered accommodation) in the next Local Development Plan.
4. **An Ageing Population** - Scotland’s population is growing and ageing. Edinburgh as a subsection of the national situation is no exception to this general trend. As noted in the table below, extracted from Population Projections for the National Records of Scotland (2016 based figures), the proportion of the City’s population of pensionable age and over (65+) is projected to increase by 32.3% by 2041 with the proportion of those aged 75 and over projected to increase by 77.7 % in the same period.

Pensionable Age and Over (65+)					Aged 75 and Over				
2021	2026	2031	2036	2041	2021	2026	2031	2036	2041
-3.9%	5.8%	12.7%	24.2%	32.3%	4.8%	22.3%	37.0%	56.9%	77.7%

Table – Projected percentage change in population (2016 based) – City of Edinburgh Council Area

5. The new Planning (Scotland) Act 2019 has introduced Section 3CD ‘Duty of Scottish Ministers to report on housing needs of older people and disabled people’ requiring Scottish Ministers, after the end of each two year period, to lay before the Scottish Parliament a report on how the planning system is operating to help ensure that the housing needs of older people and disabled people are met. The report must contain information setting out how the planning system is operating to ensure that new housing meets the needs of older people and disabled people is constructed and how existing housing is being adapted. It should also report on the extent to which any other actions taken by Scottish Ministers in relation to the planning system are meeting the housing needs of older and disabled people and any other matters relevant to meeting their needs.
6. It is clear from the above that the Scottish Government are making the provision of housing for the elderly one of its key priorities; stemming from which Local Authorities will have to consider this and themselves take steps to ensure that the housing needs of the elderly are being met and appropriately provided for.

‘Our society has built very few new homes specifically to meet the needs and aspirations of our ageing population. Without addressing this, most of us will stay in properties that may well become hard to maintain, may be inaccessible, create worries for sons and daughters or exacerbate loneliness.

In old age, housing is not just about having a home, it is about maintaining independence often with declining health.’

Lord Best OBE

Chairman of HAPPI (The Housing our Ageing Population: Panel for Innovation)

7. Whilst there is a general acknowledgement within the various documents published in association with the Main Issues Report that Edinburgh will experience a significant growth in its elderly population, it is notable that the Choices for City Plan 2030 Document has not presented any specific proposals for the provision of housing for the elderly in the City; focusing instead on General Needs Market Housing, Affordable Housing, Student Housing and the change of use from housing to other uses (e.g. short term holiday lets). In our client’s view, supported by Section 3CD of the new Planning (Scotland) Act 2019 referred to previously, the emerging local development plan **must** address the demographic imperative

of an ageing population and an existing housing stock that is ill equipped to deal with its needs.

8. **Liberton Drive** - The subject site being promoted for the development of retirement housing in this instance is located immediately to the south west of the junction of Liberton Drive and Alnwickhill Road and comprises 3.35 hectares (8.28 acres) of unused agricultural land as outlined in red in **Document 1**. The land rises very gently to the south from a post and wire fence that extends along its northern boundary, at the rear of the footpath on the south side of Liberton Drive. A similar fence extends along its eastern boundary, adjacent to Alnwickhill Road where a single storey house and garden form an inset to the site. A belt of trees has been established on a 1-2 metre high embankment, along the southern boundary of the site. To the west of the site exists the walled garden and driveway to Liberton House which is a Listed Building. Beyond Liberton House there exists the Braid Hills Care Home, Tower Farm Riding Stables and the Braid Hills Golf Centre. Predominantly two storey houses on the northern side of Liberton Drive and eastern side of Alnwickhill Road overlook the site. Agricultural land exists beyond the southern boundary.
9. **The Proposed Development** – Our clients propose to develop the site for the provision of retirement accommodation (sheltered housing) which would take the form of predominantly one and two bedroom properties. Whilst Scottish Planning Policy (SPP) and existing Local Development Plan Policy (Policy HOU 6 - Affordable Housing and supporting text) clearly state, that *‘where planning permission is sought for specialist housing, an affordable housing contribution may not always be required’*, our clients are proposing that at least 35% of the units proposed are delivered within an affordable tenure. They are able to include an affordable retirement element in this location as they already own the site resulting in a more viable scheme than would otherwise be the case but still on the proviso that all of the following considerations are met:
 - the affordable housing must have separate access/egress arrangements and be provided with separate allocated parking; and
 - it must sit within its own amenity and communal space both within the building and externally. (RSL’s not prepared to pay high service charges associated with private retirement schemes)

It is important to note that it will not be possible to provide affordable housing in association with all retirement schemes as both Scottish Planning Policy and the Council’s existing local development plan accept.

10. In addition to the above our clients are also prepared to provide land for and make a contribution towards the construction of a community facility and will consult and engage with local residents on the nature of that facility. It is also envisaged that a significant part of the site would be reserved for open space to be used for active recreational purposes and which would complement rather than compete with the existing facilities at Liberton Park to the east.
11. The Liberton Drive site is considered to be well located for the development of retirement accommodation due to its close proximity to a range of facilities considered essential to help maintain an older person’s independence and well-being. In addition to those facilities described in Paragraph 8 previously, attention is also drawn to the site’s proximity to Liberton Brae to the east where there are a range of local shopping and other facilities and to

an excellent bus based public transport system from which all parts of the city can be easily accessed.

12. **Planning History** – The Liberton Drive site has been promoted for housing development on a number of occasions in the past. Most recently it was promoted for housing development and associated open space through the processes associated with the existing Edinburgh Local Development Plan adopted by the Council in 2016. The appointed Reporters who considered objections made to that plan made the following comments in concluding that the site should remain in the Green Belt.

- The site would be out of character with the surrounding area which has a distinctly rural character.
- The partial development of the site would continue to introduce urban residential development to the detriment of the City's open southern skyline.
- The proposal would partly enclose the remaining open aspect of Liberton House and its walled garden which would no longer read as singular landmark features within a rural landscape setting.
- The open aspect to the south of Liberton Drive and west of Alnwickhill Rd, establishes clear separation between the city and open countryside of the Braid Hills, whilst permitting views across the landscape.
- Development of the site, whilst retaining partial views across the site, would be likely to result in cumulative erosion of the integrity of the green belt in this location.

13. Whilst the above conclusions are noted, it is important to recognise and to give due cognisance to the fact that the Liberton Drive site has been favourably considered by Scottish Government Reporters for release in earlier local plan reviews, albeit, at a time when such decisions were not binding on the Council. Key points to note from the earlier period referred to include, inter-alia, the following:

- The Reporter at the 2003 South East Edinburgh Local Plan (SEELP) Inquiry found and recommended that the site should be released from the Green Belt concluding that the existing green belt – the fence-line along Liberton Drive and Alnwickhill road boundary was not particularly strong. In contrast, he concluded that the boundaries to the south and west, including the tree planting and Liberton House could form strong and defensible green belt boundaries.
- A similar view about the south and west boundaries of the site was also taken by the Reporter at the 1991 SEELP Inquiry. At that time there was a stone wall along the roadside edge of the site. It was concluded that this provided a good green belt boundary, but it was also considered that tree planting to the west and south would satisfactorily contain the development and create defensible new green belt boundaries.
- The Edinburgh Green Belt Boundary Study of 1999 also identified the existing green belt boundary around the site as being weak. The report advised that where existing boundaries were found to be weak they should either be strengthened, for example through planting or be relocated to a new defensible line by extending or cutting back to a new defensible line.

- With regard to ‘*landscape setting*’, the Reporter at the 2003 Inquiry concluded that the allocation of this site would not affect the continuous green belt around the city. Whilst he concluded that development on the site would be visible from various locations on the higher ground to the south of the site, such as the Braid Hills and Stanedykehead it would be substantially screened by the woodland along the southern and western boundaries of the site. He further concluded that the greatest impact would be on views from Liberton Drive and Alnwickhill Road, where houses on the site would be visible in the foreground and most of the view to the attractive countryside beyond. However he considered that view to be, very much restricted by the woodland along the southern boundary of the site and would become more restricted over time as these trees grow.
 - The Reporter at the 2003 Inquiry also concluded that the tree belt and the trees in the grounds of Liberton House would provide a backdrop to enable the landscape to absorb low rise family housing, that such development would not significantly adversely affect long range views and could, with appropriate additional landscaping, further strengthen the southern boundary of the site while at the same time having only minimal impact on the landscape setting of this part of the city.
 - The Reporter to the 2003 SEELP Inquiry concluded that the area of the green belt to the west of Liberton House to be essentially urban in character and clearly not in keeping with the rest of the AGLV (Area of Great Landscape Value). He pointed out that Circular 2/1962 makes clear that an area proposed for an AGLV has to be considered in context and highlighted that the Liberton Drive site is more or less cut off from the remainder of the AGLV and cannot be said to form an integral part of a rugged hill landscape, as described in the EGBBS (Edinburgh Green Belt Boundary Study). He concluded that the site should be removed from the AGLV and that the boundaries of the AGLV should be redrawn to exclude the adjacent commercial areas.
 - The Council itself proposed housing development on the site in the Finalised Draft SEELP 1986. The Local Plan included a Development Brief for the proposed housing development, which included a brief description and indicative layout. The text specifically referred to landscape measures to be carried out along the western boundary to contain the development and "*safeguard the setting of Liberton House.*"
14. It is difficult to reconcile the comments made by the Reporters in the 1991 and 2003 Local Plan Inquiries with those made by the Reporters assessing objections to the existing Edinburgh Local Development Plan which was adopted in 2016. However it is important to recognise that clear differences of opinion on the development merits of this site have emerged through the passage of time with some Reporters considering it appropriate for development and others not being so positively disposed.
15. Setting the planning history aside we are very firmly of the view that the urban structure of the site, as presently existing, when viewed in conjunction with existing development to the west of the site, is ill defined. Appropriately designed development including the provision of a strong edge along Liberton Drive, would simplify the landscape character of the area and would remove some of the visual confusion currently experienced when driving along Liberton Drive. Established views to the hills are already partly lost as a result of the landscape change that has occurred over the last 20 years, particularly the

maturing of the woodland belt and the trees in the grounds of Liberton House, and will eventually be lost even without the development. Appropriately designed development on the site, would, in our opinion, as it has done so in the opinion of others before, provide a stronger urban edge and a more understandable transition from the urban to rural landscape.

16. **City Plan 2030, Housing Study** - The site at Liberton Drive has been assessed in the Council's Housing Study (January 2020) which forms a background report to the Main Issues Report (City Plan 2030). The Housing Report assesses the merits of the site against a range of criteria under the headings of Active Travel, Public Transport, Community Infrastructure (Schools), Landscape Character, Green Network and Flood Risk. It concludes that the site is not suitable for development due to its poor community infrastructure capacity, prominent landscape character and contribution to the strategic green network.
17. *Community Infrastructure* – The Community Infrastructure Criterion relates exclusively to education capacity. As the site at Liberton Drive is being promoted for a sheltered housing proposal which will be occupied by the over 55s it will cause no impact whatsoever on community (education) infrastructure.

Landscape Character – Issues relating to landscape character have been addressed previously in Paragraphs 11-14 above. We are of the view, supported by the Reporters who assessed objections to the 1991 and 2003 South East Edinburgh Local Plan Inquiries that the site being promoted for a low rise retirement housing scheme can be developed without adverse impact on the character or landscape setting of the City or without adverse impact on the setting of the listed Liberton House.

Green Network – The Council's assessment claims that the lands to the south of Liberton Drive are currently used as open space (partly) and that they contribute to the unbroken landscape scale multi-functional green network stretching from Midlothian to Blackford Hill. Whilst some of these comments may be correct insofar as they relate to the area to the south of the site being promoted, they are entirely incorrect insofar as they relate to the site itself. Firstly, the site being promoted is set-aside agricultural land and is not used either in full or in part as open space. Secondly, the site does not, even by the wildest stretch of the imagination form a multi-functional green network stretching from Midlothian to Blackford Hill. With the exception of those lands to the south, the site is bounded by built development on all sides.

18. **Zoning Request** - The following considerations add support for the identification/zoning of the lands for retirement housing purposes in the emerging local development plan:
 - The population of Edinburgh is ageing with substantial increases in the retirement and over 75 age groups forecast. The emerging local development plan must address the demographic imperative of an ageing population and an existing housing stock that is ill equipped to deal with its needs.
 - There are a number of benefits associated with the provision of housing for the elderly (sheltered accommodation) on the site.
 - It will contribute to housing supply in the local housing market by providing desirable downsizing options for elderly residents thus addressing issues

associated with under occupation and the freeing up of family homes for younger people in need of them.

- Occupiers of sheltered housing developments report huge health benefits: including improvements to their quality of life generally; fewer visits to health professionals; and quicker recovery times following hospital stays.
- A higher quality of life for residents and their families.
- Greater security and convenience, and reduced feelings of isolation and vulnerability.
- Improved independence, well-being and health.
- Environmentally better than traditional housing, with reduced energy use, including less travel.
- Sustains local shopping and other services, helping to sustain local communities.
- Private rather than public – its provision entails no cost to the public purse.
- Most residents have family and friends in the locality. Older people form an important part of the core of most communities with the Liberton Area being no exception.

Whilst adapting housing or new build (mainstream) to Housing for Varying Needs provides specialized accommodation - this does not address the issue of isolation and loneliness which contribute greatly to adverse health in older people. Retirement living is managed and provides communal facilities that encourage a sense of community within the development.

- The site at Liberton Drive is suitably located for the provision of elderly housing in that it benefits from easy access to a range of facilities and services including public transport provision with bus routes existing along Liberton Brae and Liberton Gardens to the east.
- The development of the site for retirement accommodation places no burden whatsoever on the Council's education infrastructure.
- Given the extensive landscaping belt existing along the southern boundary of the site, combined with existing topographical considerations and proposed additional planting; the site can be visually contained, appear as part of the urban area and in the process contribute to the landscape setting of the city.
- The site, in itself, does not act as a buffer preventing the coalescence of Edinburgh with any other built up area and if removed from the Green Belt and designated for residential purposes (retirement accommodation) does not lead to the erosion or loss of a significant area of open space contributing to the purposes of green belt designation.

- The site is capable of accommodating a residential development of the nature proposed without adverse impact on the setting of the listed Liberton House which can be protected and preserved with appropriate planting and landscaping proposals.
- The site has been favourably considered for development as part of the processes associated with earlier local plan reviews with Reporters suggesting that its release (on two occasions in the past) would contribute to rather than detract from the character and appearance of the landscape.

In view of the considerations outlined above, it is respectfully requested that the site, as outlined in red in **Document 1** is

- (a) removed from the Green Belt;
- (b) removed from the Special Area of Conservation; and
- (c) zoned for sheltered housing development (retirement housing) in the next local development plan prepared for the City.

Please acknowledge receipt and registration of these representations at your earliest convenience.

Please also note that we have no objection to the representations being made publicly accessible.

Yours faithfully



Derek Scott

enc.



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ema
ARCHITECTURE + DESIGN

LAND OPTIONS EAST LIMITED
LAND AT LIBERTON DRIVE
EDINBURGH

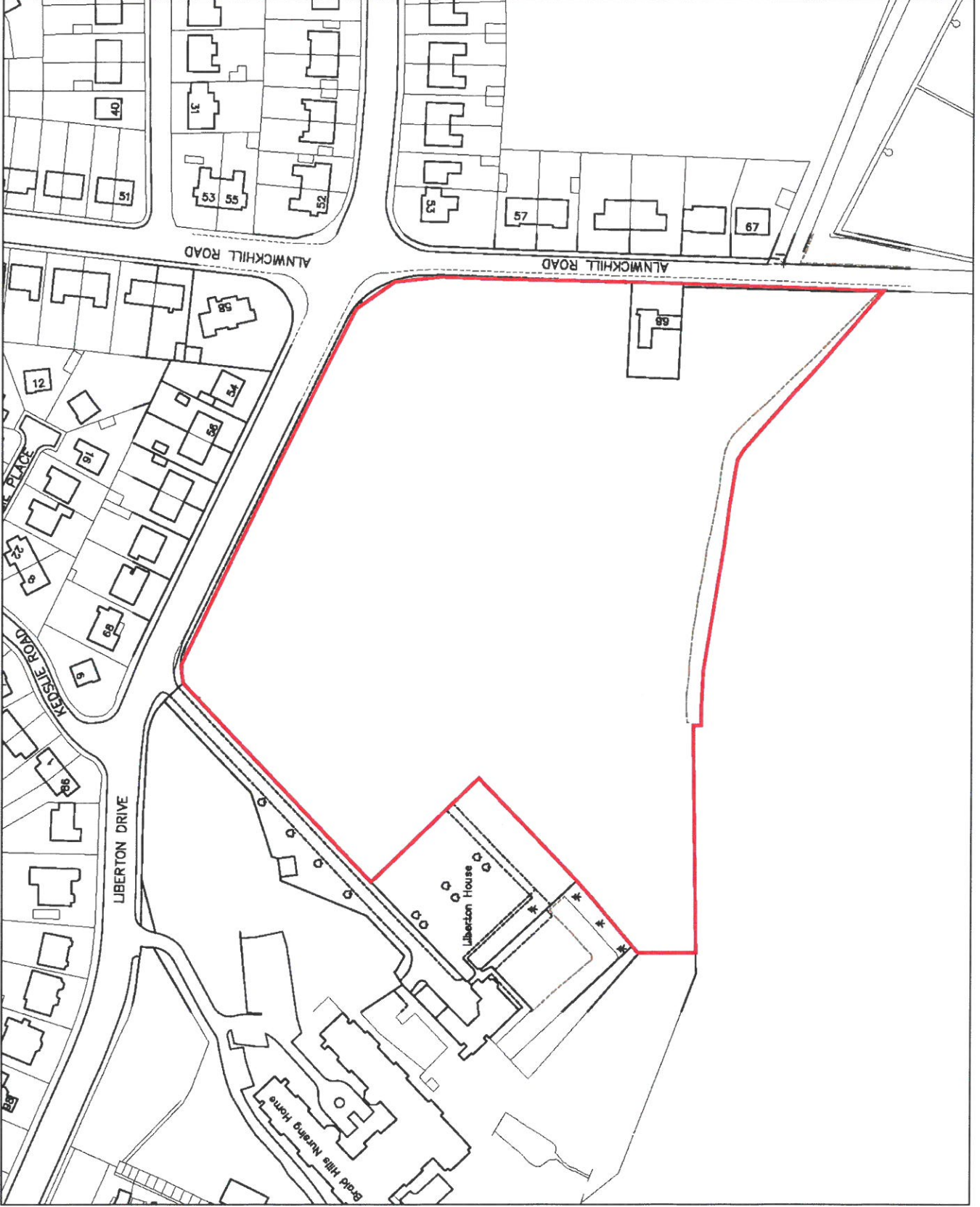
SITE LOCATION PLAN

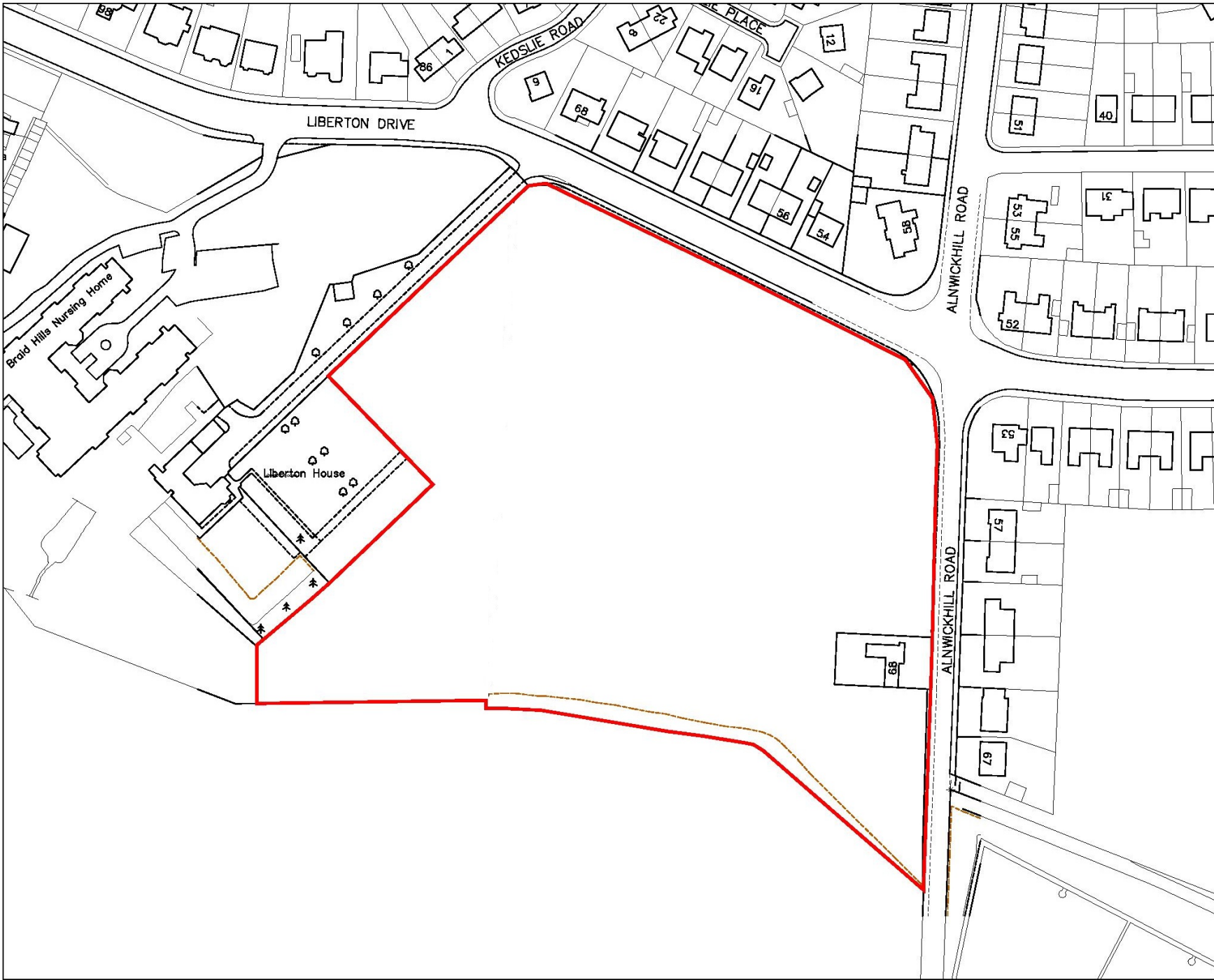
SITE AREA = 3.713 Ha (9.175 Acres)

1	1:25000000	1:25000000	1:25000000
2	1:25000000	1:25000000	1:25000000
3	1:25000000	1:25000000	1:25000000
4	1:25000000	1:25000000	1:25000000
5	1:25000000	1:25000000	1:25000000
6	1:25000000	1:25000000	1:25000000
7	1:25000000	1:25000000	1:25000000
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 ARCHITECTURE + DESIGN

LAND OPTIONS EAST LIMITED
 LAND AT LIBERTON DRIVE
 EDINBURGH

SITE LOCATION PLAN
 SITE AREA = 3.713 Ha (9.175 Acres)

SCALE	1:2500 @ A3	DATE	08.05.13
BY	ELM/CS	REVISED	08.05.13
NO	1	BY	ELM/CS
DATE	08.05.13	REVISION	08.05.13

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Our Ref: ep636/let001/DS

28th April 2020

City of Edinburgh Council
Planning Department (Local Development Plan)
Waverley Court
4 East Market Street
Edinburgh
EH8 8BG

Dear Sir/Madam,

CHOICES FOR CITY PLAN 2030 – REPRESENTATIONS ON BEHALF OF JUNIPER RESIDENTIAL LIMITED IN RESPECT OF LAND LYING TO THE SOUTH WEST OF THE JUNCTION OF LIBERTON DRIVE AND ALNWICKHILL ROAD, EDINBURGH

1. We write on behalf of our client, Juniper Residential Limited, who have an interest in land lying to the south west of the junction of Liberton Drive and Alnwickhill Road, Edinburgh as outlined in red on the location plan attached as **Document 1**.
2. **Juniper Residential Limited (Juniper Residential)** – Juniper Residential forms part of the award winning Cruden Group, one of Scotland’s largest privately-owned development and construction companies. Established in 1943 and with over 600 employees they have delivered, in recent years, more than 1500 homes per annum across a variety of market sectors. Juniper Residential was formed in 2018 with the aim of providing well-designed and carefully considered bespoke retirement housing that fully compliments the environmental setting in which they are situated. The company are committed to providing their customers with a home that provides the quality, security and environment suited to the demands of the evolving retirement lifestyle.
3. **Edinburgh Local Development Plan 2016** – The existing local development plan which was adopted in 2016 allocates the Liberton Drive site within the Green Belt and within a Special Landscape Area (Braids, Liberton and Mortonhall). Our client wishes to have the land removed from the Green Belt/Special Landscape Area and rezoned for the development of retirement housing for the over 55s (sheltered accommodation) in the next Local Development Plan.
4. **An Ageing Population** - Scotland’s population is growing and ageing. Edinburgh as a subsection of the national situation is no exception to this general trend. As noted in the table below, extracted from Population Projections for the National Records of Scotland (2016 based figures), the proportion of the City’s population of pensionable age and over (65+) is projected to increase by 32.3% by 2041 with the proportion of those aged 75 and over projected to increase by 77.7 % in the same period.

Pensionable Age and Over (65+)					Aged 75 and Over				
2021	2026	2031	2036	2041	2021	2026	2031	2036	2041
-3.9%	5.8%	12.7%	24.2%	32.3%	4.8%	22.3%	37.0%	56.9%	77.7%

Table – Projected percentage change in population (2016 based) – City of Edinburgh Council Area

5. The new Planning (Scotland) Act 2019 has introduced Section 3CD ‘Duty of Scottish Ministers to report on housing needs of older people and disabled people’ requiring Scottish Ministers, after the end of each two year period, to lay before the Scottish Parliament a report on how the planning system is operating to help ensure that the housing needs of older people and disabled people are met. The report must contain information setting out how the planning system is operating to ensure that new housing meets the needs of older people and disabled people is constructed and how existing housing is being adapted. It should also report on the extent to which any other actions taken by Scottish Ministers in relation to the planning system are meeting the housing needs of older and disabled people and any other matters relevant to meeting their needs.
6. It is clear from the above that the Scottish Government are making the provision of housing for the elderly one of its key priorities; stemming from which Local Authorities will have to consider this and themselves take steps to ensure that the housing needs of the elderly are being met and appropriately provided for.

‘Our society has built very few new homes specifically to meet the needs and aspirations of our ageing population. Without addressing this, most of us will stay in properties that may well become hard to maintain, may be inaccessible, create worries for sons and daughters or exacerbate loneliness.

In old age, housing is not just about having a home, it is about maintaining independence often with declining health.’

Lord Best OBE

Chairman of HAPPI (The Housing our Ageing Population: Panel for Innovation)

7. Whilst there is a general acknowledgement within the various documents published in association with the Main Issues Report that Edinburgh will experience a significant growth in its elderly population, it is notable that the Choices for City Plan 2030 Document has not presented any specific proposals for the provision of housing for the elderly in the City; focusing instead on General Needs Market Housing, Affordable Housing, Student Housing and the change of use from housing to other uses (e.g. short term holiday lets). In our client’s view, supported by Section 3CD of the new Planning (Scotland) Act 2019 referred to previously, the emerging local development plan **must** address the demographic imperative

of an ageing population and an existing housing stock that is ill equipped to deal with its needs.

8. **Liberton Drive** - The subject site being promoted for the development of retirement housing in this instance is located immediately to the south west of the junction of Liberton Drive and Alnwickhill Road and comprises 3.35 hectares (8.28 acres) of unused agricultural land as outlined in red in **Document 1**. The land rises very gently to the south from a post and wire fence that extends along its northern boundary, at the rear of the footpath on the south side of Liberton Drive. A similar fence extends along its eastern boundary, adjacent to Alnwickhill Road where a single storey house and garden form an inset to the site. A belt of trees has been established on a 1-2 metre high embankment, along the southern boundary of the site. To the west of the site exists the walled garden and driveway to Liberton House which is a Listed Building. Beyond Liberton House there exists the Braid Hills Care Home, Tower Farm Riding Stables and the Braid Hills Golf Centre. Predominantly two storey houses on the northern side of Liberton Drive and eastern side of Alnwickhill Road overlook the site. Agricultural land exists beyond the southern boundary.

9. **The Proposed Development** – Our clients propose to develop the site for the provision of retirement accommodation (sheltered housing) which would take the form of predominantly one and two bedroom properties. Whilst Scottish Planning Policy (SPP) and existing Local Development Plan Policy (Policy HOU 6 - Affordable Housing and supporting text) clearly state, that *‘where planning permission is sought for specialist housing, an affordable housing contribution may not always be required’*, our clients are proposing that at least 35% of the units proposed are delivered within an affordable tenure. They are able to include an affordable retirement element in this location as they already own the site resulting in a more viable scheme than would otherwise be the case but still on the proviso that all of the following considerations are met:
 - the affordable housing must have separate access/egress arrangements and be provided with separate allocated parking; and
 - it must sit within its own amenity and communal space both within the building and externally. (RSL’s not prepared to pay high service charges associated with private retirement schemes)

It is important to note that it will not be possible to provide affordable housing in association with all retirement schemes as both Scottish Planning Policy and the Council’s existing local development plan accept.

10. In addition to the above our clients are also prepared to provide land for and make a contribution towards the construction of a community facility and will consult and engage with local residents on the nature of that facility. It is also envisaged that a significant part of the site would be reserved for open space to be used for active recreational purposes and which would complement rather than compete with the existing facilities at Liberton Park to the east.

11. The Liberton Drive site is considered to be well located for the development of retirement accommodation due to its close proximity to a range of facilities considered essential to help maintain an older person’s independence and well-being. In addition to those facilities described in Paragraph 8 previously, attention is also drawn to the site’s proximity to Liberton Brae to the east where there are a range of local shopping and other facilities and to

an excellent bus based public transport system from which all parts of the city can be easily accessed.

12. **Planning History** – The Liberton Drive site has been promoted for housing development on a number of occasions in the past. Most recently it was promoted for housing development and associated open space through the processes associated with the existing Edinburgh Local Development Plan adopted by the Council in 2016. The appointed Reporters who considered objections made to that plan made the following comments in concluding that the site should remain in the Green Belt.

- The site would be out of character with the surrounding area which has a distinctly rural character.
- The partial development of the site would continue to introduce urban residential development to the detriment of the City's open southern skyline.
- The proposal would partly enclose the remaining open aspect of Liberton House and its walled garden which would no longer read as singular landmark features within a rural landscape setting.
- The open aspect to the south of Liberton Drive and west of Alnwickhill Rd, establishes clear separation between the city and open countryside of the Braid Hills, whilst permitting views across the landscape.
- Development of the site, whilst retaining partial views across the site, would be likely to result in cumulative erosion of the integrity of the green belt in this location.

13. Whilst the above conclusions are noted, it is important to recognise and to give due cognisance to the fact that the Liberton Drive site has been favourably considered by Scottish Government Reporters for release in earlier local plan reviews, albeit, at a time when such decisions were not binding on the Council. Key points to note from the earlier period referred to include, inter-alia, the following:

- The Reporter at the 2003 South East Edinburgh Local Plan (SEELP) Inquiry found and recommended that the site should be released from the Green Belt concluding that the existing green belt – the fence-line along Liberton Drive and Alnwickhill road boundary was not particularly strong. In contrast, he concluded that the boundaries to the south and west, including the tree planting and Liberton House could form strong and defensible green belt boundaries.
- A similar view about the south and west boundaries of the site was also taken by the Reporter at the 1991 SEELP Inquiry. At that time there was a stone wall along the roadside edge of the site. It was concluded that this provided a good green belt boundary, but it was also considered that tree planting to the west and south would satisfactorily contain the development and create defensible new green belt boundaries.
- The Edinburgh Green Belt Boundary Study of 1999 also identified the existing green belt boundary around the site as being weak. The report advised that where existing boundaries were found to be weak they should either be strengthened, for example through planting or be relocated to a new defensible line by extending or cutting back to a new defensible line.

- With regard to ‘*landscape setting*’, the Reporter at the 2003 Inquiry concluded that the allocation of this site would not affect the continuous green belt around the city. Whilst he concluded that development on the site would be visible from various locations on the higher ground to the south of the site, such as the Braid Hills and Stanedykehead it would be substantially screened by the woodland along the southern and western boundaries of the site. He further concluded that the greatest impact would be on views from Liberton Drive and Alnwickhill Road, where houses on the site would be visible in the foreground and most of the view to the attractive countryside beyond. However he considered that view to be, very much restricted by the woodland along the southern boundary of the site and would become more restricted over time as these trees grow.
 - The Reporter at the 2003 Inquiry also concluded that the tree belt and the trees in the grounds of Liberton House would provide a backdrop to enable the landscape to absorb low rise family housing, that such development would not significantly adversely affect long range views and could, with appropriate additional landscaping, further strengthen the southern boundary of the site while at the same time having only minimal impact on the landscape setting of this part of the city.
 - The Reporter to the 2003 SEELP Inquiry concluded that the area of the green belt to the west of Liberton House to be essentially urban in character and clearly not in keeping with the rest of the AGLV (Area of Great Landscape Value). He pointed out that Circular 2/1962 makes clear that an area proposed for an AGLV has to be considered in context and highlighted that the Liberton Drive site is more or less cut off from the remainder of the AGLV and cannot be said to form an integral part of a rugged hill landscape, as described in the EGBBS (Edinburgh Green Belt Boundary Study). He concluded that the site should be removed from the AGLV and that the boundaries of the AGLV should be redrawn to exclude the adjacent commercial areas.
 - The Council itself proposed housing development on the site in the Finalised Draft SEELP 1986. The Local Plan included a Development Brief for the proposed housing development, which included a brief description and indicative layout. The text specifically referred to landscape measures to be carried out along the western boundary to contain the development and "*safeguard the setting of Liberton House.*"
14. It is difficult to reconcile the comments made by the Reporters in the 1991 and 2003 Local Plan Inquiries with those made by the Reporters assessing objections to the existing Edinburgh Local Development Plan which was adopted in 2016. However it is important to recognise that clear differences of opinion on the development merits of this site have emerged through the passage of time with some Reporters considering it appropriate for development and others not being so positively disposed.
15. Setting the planning history aside we are very firmly of the view that the urban structure of the site, as presently existing, when viewed in conjunction with existing development to the west of the site, is ill defined. Appropriately designed development including the provision of a strong edge along Liberton Drive, would simplify the landscape character of the area and would remove some of the visual confusion currently experienced when driving along Liberton Drive. Established views to the hills are already partly lost as a result of the landscape change that has occurred over the last 20 years, particularly the

maturing of the woodland belt and the trees in the grounds of Liberton House, and will eventually be lost even without the development. Appropriately designed development on the site, would, in our opinion, as it has done so in the opinion of others before, provide a stronger urban edge and a more understandable transition from the urban to rural landscape.

16. **City Plan 2030, Housing Study** - The site at Liberton Drive has been assessed in the Council's Housing Study (January 2020) which forms a background report to the Main Issues Report (City Plan 2030). The Housing Report assesses the merits of the site against a range of criteria under the headings of Active Travel, Public Transport, Community Infrastructure (Schools), Landscape Character, Green Network and Flood Risk. It concludes that the site is not suitable for development due to its poor community infrastructure capacity, prominent landscape character and contribution to the strategic green network.
17. *Community Infrastructure* – The Community Infrastructure Criterion relates exclusively to education capacity. As the site at Liberton Drive is being promoted for a sheltered housing proposal which will be occupied by the over 55s it will cause no impact whatsoever on community (education) infrastructure.

Landscape Character – Issues relating to landscape character have been addressed previously in Paragraphs 11-14 above. We are of the view, supported by the Reporters who assessed objections to the 1991 and 2003 South East Edinburgh Local Plan Inquiries that the site being promoted for a low rise retirement housing scheme can be developed without adverse impact on the character or landscape setting of the City or without adverse impact on the setting of the listed Liberton House.

Green Network – The Council's assessment claims that the lands to the south of Liberton Drive are currently used as open space (partly) and that they contribute to the unbroken landscape scale multi-functional green network stretching from Midlothian to Blackford Hill. Whilst some of these comments may be correct insofar as they relate to the area to the south of the site being promoted, they are entirely incorrect insofar as they relate to the site itself. Firstly, the site being promoted is set-aside agricultural land and is not used either in full or in part as open space. Secondly, the site does not, even by the wildest stretch of the imagination form a multi-functional green network stretching from Midlothian to Blackford Hill. With the exception of those lands to the south, the site is bounded by built development on all sides.

18. **Zoning Request** - The following considerations add support for the identification/zoning of the lands for retirement housing purposes in the emerging local development plan:
 - The population of Edinburgh is ageing with substantial increases in the retirement and over 75 age groups forecast. The emerging local development plan must address the demographic imperative of an ageing population and an existing housing stock that is ill equipped to deal with its needs.
 - There are a number of benefits associated with the provision of housing for the elderly (sheltered accommodation) on the site.
 - It will contribute to housing supply in the local housing market by providing desirable downsizing options for elderly residents thus addressing issues

associated with under occupation and the freeing up of family homes for younger people in need of them.

- Occupiers of sheltered housing developments report huge health benefits: including improvements to their quality of life generally; fewer visits to health professionals; and quicker recovery times following hospital stays.
- A higher quality of life for residents and their families.
- Greater security and convenience, and reduced feelings of isolation and vulnerability.
- Improved independence, well-being and health.
- Environmentally better than traditional housing, with reduced energy use, including less travel.
- Sustains local shopping and other services, helping to sustain local communities.
- Private rather than public – its provision entails no cost to the public purse.
- Most residents have family and friends in the locality. Older people form an important part of the core of most communities with the Liberton Area being no exception.

Whilst adapting housing or new build (mainstream) to Housing for Varying Needs provides specialized accommodation - this does not address the issue of isolation and loneliness which contribute greatly to adverse health in older people. Retirement living is managed and provides communal facilities that encourage a sense of community within the development.

- The site at Liberton Drive is suitably located for the provision of elderly housing in that it benefits from easy access to a range of facilities and services including public transport provision with bus routes existing along Liberton Brae and Liberton Gardens to the east.
- The development of the site for retirement accommodation places no burden whatsoever on the Council's education infrastructure.
- Given the extensive landscaping belt existing along the southern boundary of the site, combined with existing topographical considerations and proposed additional planting; the site can be visually contained, appear as part of the urban area and in the process contribute to the landscape setting of the city.
- The site, in itself, does not act as a buffer preventing the coalescence of Edinburgh with any other built up area and if removed from the Green Belt and designated for residential purposes (retirement accommodation) does not lead to the erosion or loss of a significant area of open space contributing to the purposes of green belt designation.

- The site is capable of accommodating a residential development of the nature proposed without adverse impact on the setting of the listed Liberton House which can be protected and preserved with appropriate planting and landscaping proposals.
- The site has been favourably considered for development as part of the processes associated with earlier local plan reviews with Reporters suggesting that its release (on two occasions in the past) would contribute to rather than detract from the character and appearance of the landscape.

In view of the considerations outlined above, it is respectfully requested that the site, as outlined in red in **Document 1** is

- (a) removed from the Green Belt;
- (b) removed from the Special Area of Conservation; and
- (c) zoned for sheltered housing development (retirement housing) in the next local development plan prepared for the City.

Please acknowledge receipt and registration of these representations at your earliest convenience.

Please also note that we have no objection to the representations being made publicly accessible.

Yours faithfully



Derek Scott

enc.



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LAND AT LIBERTON DRIVE
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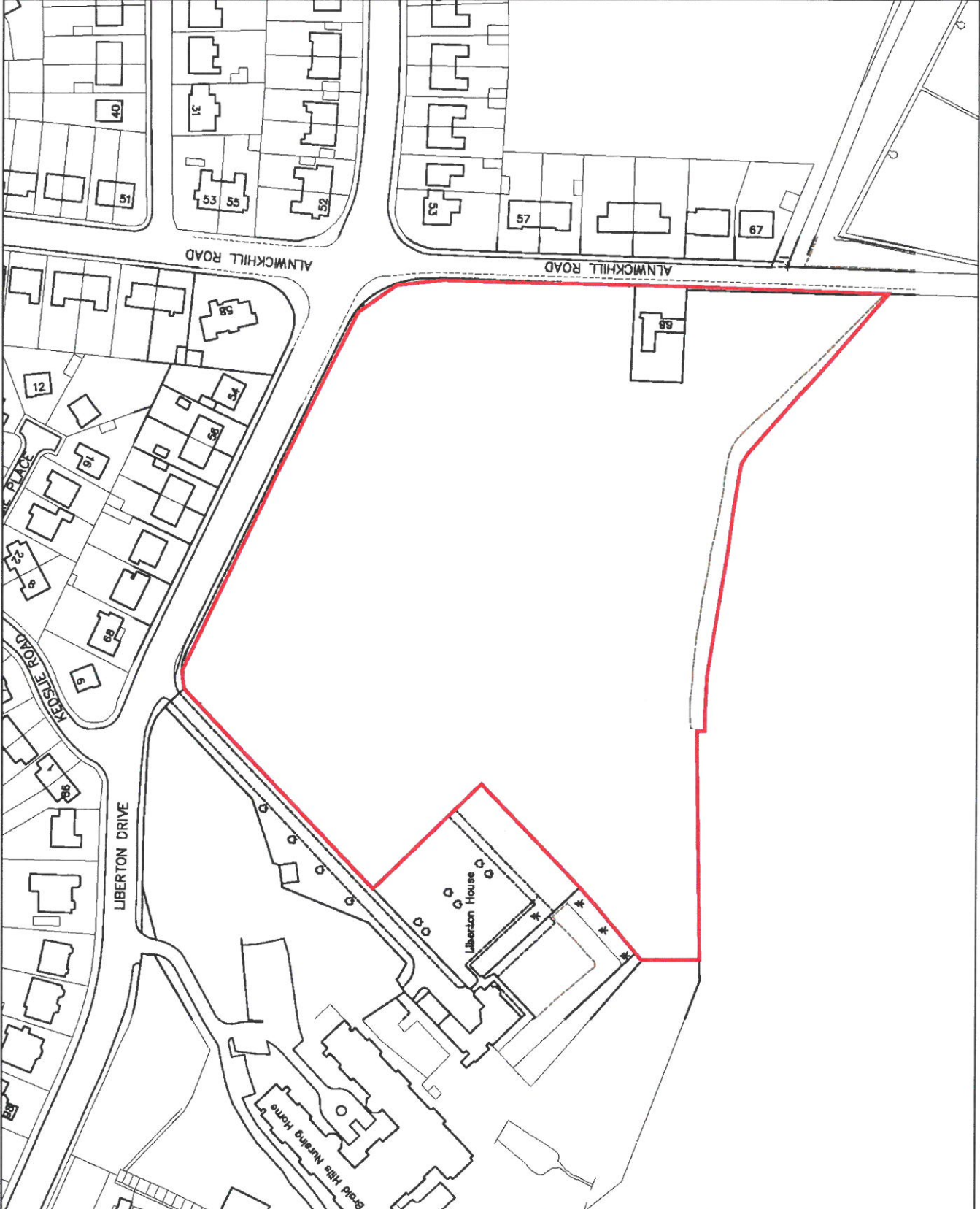
SITE LOCATION PLAN

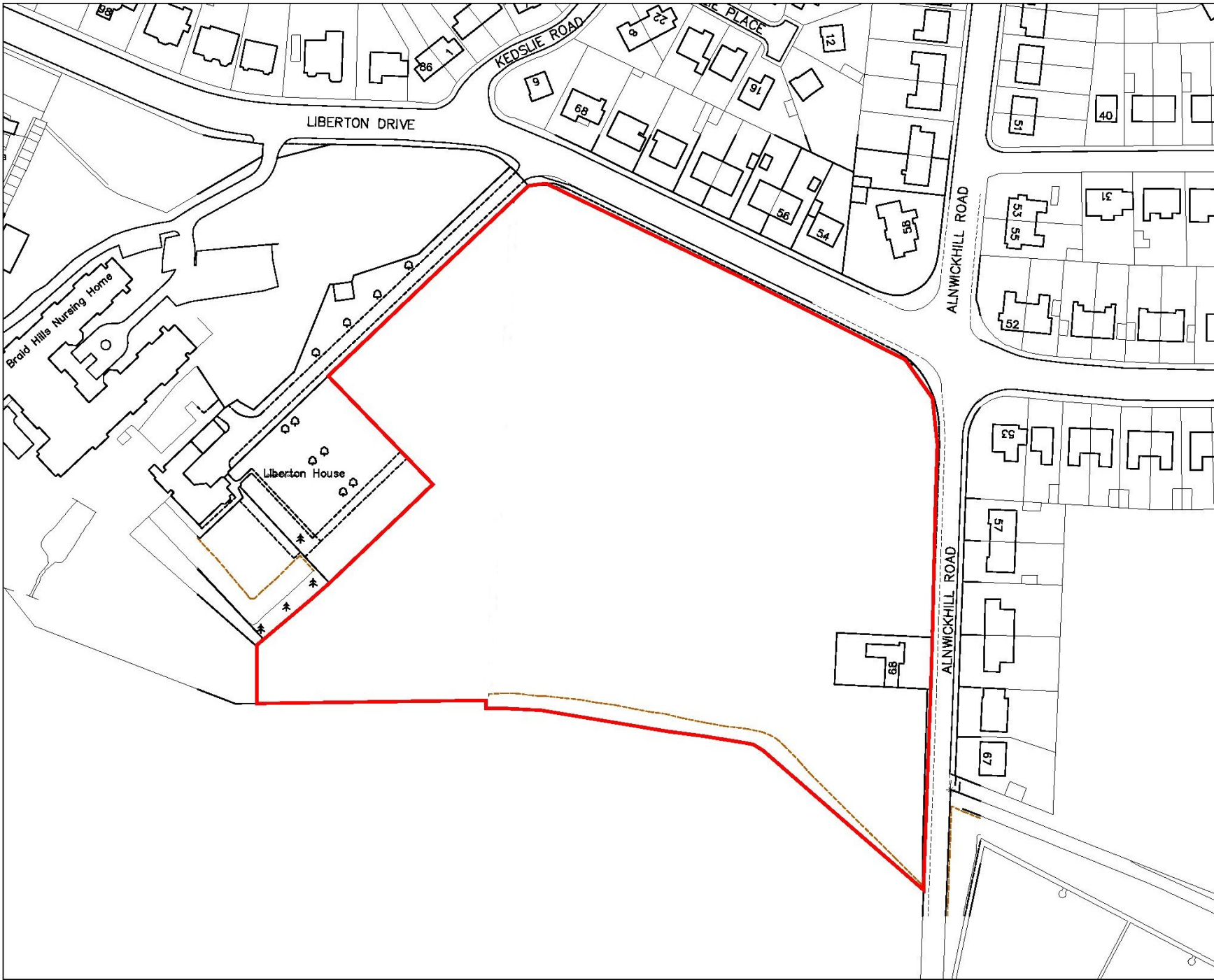
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SCALE	1:2500@A3	DATE	04.05.13
DATE	04.05.13	BY	ELM/CS
SCALE	ANY DIMENSIONS TO BE REPORTED TO IMA		
PROJECT	12037 (OS) 001 A		

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