

Customer Ref:

01748

Response Ref:

BHLF-KU2U-GPFT-R

Supporting Info

Yes

Name

Stuart Salter

Email

stuart@geddesconsulting.com

Response Type

Agent / Consultant

On behalf of:

Tipthereth

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

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

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

Supporting Info

Email

Choice 1 C

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

Short Response

Explanation

Choice 1 D

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

Short Response

Explanation

Choice 1 E

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

Short Response

Explanation

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

Supporting Info   
Email

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



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Name   
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On behalf of:

Supporting Info   
Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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:   
Name   
Response Type   
On behalf of:

Supporting Info

Email

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:  Response Ref:   
Name   
Response Type   
On behalf of:

Supporting Info

Email

Choice 11 B

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

Short Response

Explanation

Choice 12 A

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

Short Response

Explanation

Choice 12 B1

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

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:   
Name   
Response Type   
On behalf of:

Supporting Info

Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

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:   
Name   
Response Type   
On behalf of:

Supporting Info

Email

Choice **12 BX**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

Choice **12 C**

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

Short Response

Explanation

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

Supporting Info

Email

Choice **12 C**

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

Short Response

Explanation

Choice **12 D**

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

Short Response

Explanation

Choice **13 A**

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

Short Response

Explanation

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

Supporting Info

Email

Choice 14 A

**We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No**

Short Response

Explanation

Choice 14 B

**We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach? - Yes / No**

Short Response

Explanation

Choice 14 C

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

Short Response

Explanation

Customer Ref:  Response Ref:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 15 A

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

Short Response

Explanation

Choice 15 B

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

Short Response

Explanation

Choice 15 C

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

Short Response

Explanation

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

Supporting Info

Email

Choice 15 D

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

Short Response

Explanation

Choice 15 E

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

Short Response

Explanation

Choice 15 G

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 A1

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

Short Response

Explanation

Choice 16 A2

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

Short Response

Explanation

Choice 16 A3

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 A4

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation

Choice 16 A5

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

Short Response

Explanation



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

Supporting Info

Email

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:

Name

Response Type

On behalf of:

Supporting Info

Email

Choice 16 E2

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

Short Response

Explanation

Choice 16 E3

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

Short Response

Explanation

Choice 16 E4

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

Short Response

Explanation

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

Supporting Info

Email

Choice 16 E5

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

Short Response

Explanation

Choice 16 E6

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

Short Response

Explanation

Choice 16 E7

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

Short Response

Explanation

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

Supporting Info

Email

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

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## Representation on behalf of Tiphereth Choices for City Plan 2030

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### Introduction

- 1.1 City of Edinburgh Council (the Council) is currently engaging in Consultation on the *Choices for City Plan 2030* (Main Issues Report (MIR)) (2020). The *City Plan 2030* will replace the adopted Local Development Plan (LDP) (2016). The Council's latest *Development Plan Scheme* (January 2020) anticipates that the *City Plan 2030* will be adopted by February 2022.
- 1.2 The MIR is the first stage in the Council's consultation process for the emerging City Plan 2030. It is therefore the first opportunity for interested parties to contribute to the formulation of the Council's development strategy and policies in the emerging City Plan 2030.
- 1.3 The current wording of LDP Policy ENV 10 requires to be amended for the following reasons:
- The current wording of the Policy is not sufficiently flexible and supportive of the range of uses and types of development where a countryside location is necessary and justified.
  - The current wording of the Policy does not support new proposals located on land associated with an existing development operation where a countryside location is necessary and justified.
- 1.4 Amending the supporting text to Policy ENV 10 will help to define the additional operations, types of uses or additional development where the principle of development can be supported because a countryside location is necessary and justified.

### Background

- 1.5 Tiphereth is a registered charity supporting adults with learning disabilities and complex needs. Tiphereth's purpose is to support the life and work of adults with learning disabilities and autism.
- 1.6 The current facilities at Tiphereth comprise three residential care homes and support for a wide variety of day services and social enterprise projects. Tiphereth's existing operations site is located to the south-west of the City of Edinburgh Bypass (A720), outside of the urban area and within the Green Belt, as defined in the City of Edinburgh Council's (the Council) Local Development Plan (LDP) Proposals Map.
- 1.7 Tiphereth works with its members and families to develop creative services that provide meaning and stability in people's lives, focused on the individual and unique challenge and circumstances of each member.
- 1.8 Tiphereth is based on a philosophy of living together working together and growing together – both those with and without learning difficulties. This is achieved by promoting a sense of belonging, making a meaningful contribution and by enjoying lifelong learning.
- 1.9 Key to delivering this philosophy is the *Camphill* shared living model. *Camphill* communities bring quality of life to people who may otherwise struggle to find opportunities for companionship, work and fulfilment in everyday society.
- 1.10 The *Camphill* model aims to create inclusive and active communities where people with learning difficulties, live work and share their lives together with people without learning difficulties.

- 1.11 The Camphill model can only work with an inclusive and active community where people with learning difficulties can live, work and share their lives together. Locating beside existing facilities is key to the successful operation of the *Camphill* model.
- 1.12 The rural location provides a sense of security, and peacefulness that cannot be easily reproduced in an urban location. Residents with autism and learning difficulties can find urban locations unsettling or overwhelming. Tiphereth's rural location therefore provides a better quality of life for its residents.
- 1.13 Tiphereth provides five working groups, focusing on a range of skills, including: arts and crafts, cooking, music, woodwork, and green woodwork projects; gardening and landscape maintenance; and community work with other charities in Edinburgh.
- 1.14 Tiphereth operates a social enterprise at its existing facilities. Tiphereth Trading provides sustainable firewood to addresses across Edinburgh. It also runs a successful composting business. In a successful partnership, the Council currently contracts Tiphereth to collect and compost green waste from the local Colinton area. This operation requires a rural location.
- 1.15 There are 11 Camphill communities across Scotland but only seven of these provide support to adults. Tiphereth is the only *Camphill* model community in Edinburgh and the Central Belt. Tiphereth provides a unique and valued service to people with learning difficulties and autism in the local area and the wider Lothians region.
- 1.16 There is a high demand for the limited places available at Tiphereth. Tiphereth currently has three residential accommodation buildings in the Torphin area. Twelve residents live in these existing facilities. This existing accommodation is insufficient to meet the ongoing demand from families. There are over 40 applicants on the waiting list at Tiphereth. Some of these people have been waiting for a place in Tiphereth's accommodation for over 15 years.
- 1.17 Tiphereth is currently considering opportunities to expand its current operations to meet this existing demand. This includes a proposal for a new residential building on a site at Torphin Road, Edinburgh that is within Tiphereth's ownership. This proposal is subject of a live Planning Application (Application Reference: 19/01036/FUL).
- 1.18 The supporting information submitted in support as part of the Planning Application details the proposal's compliance with the adopted LDP. This includes the proposal's compliance with Policy ENV 10 *Development in the Green Belt and Countryside*.

### **Purpose of Representation**

- 1.19 The purpose of this Representation is to promote an amendment to the current wording of Policy ENV 10 *Development in the Green Belt and Countryside* of the adopted LDP. This proposed amended wording will ensure that proposals on behalf of charitable organisations located within the Green Belt or Countryside (such as Tiphereth) that have a justification for a rural location can be supported by the Council.
- 1.20 Paragraph 181 of the adopted LDP states that ...*the purpose of the green belt is not to prevent developing from happening*. Paragraph 181 also states that Policy ENV 10 ...*sets out the circumstances in which development in the green belt can be supported*.
- 1.21 The supporting text to Policy ENV 10 is clear that the purpose of the Policy is not to prevent development within the Green Belt. The purpose of Policy ENV 10 is to ensure that development is restricted to defined acceptable uses within the Green Belt or designated Countryside.

- 1.22 The current wording of Policy ENV 10 states that development within the Green Belt and Countryside will only be permitted if it meets one of the four criteria listed within the Policy.
- 1.23 Criterion a) of Policy ENV 10 currently states the following:
- a) *For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.*
- 1.24 The current wording of criterion a) only permits development relating to the specific uses stated or to development ...*where a countryside location is essential*. Neither Policy ENV 10 nor the supporting text within the adopted LDP state what the Council considers constitutes an ...*essential*... countryside location.
- 1.25 The consideration of what constitutes an ...*essential*... countryside location is ill-defined in the current policy and may not be interpreted with the necessary flexibility to support necessary and justified countryside development. Charitable proposals that are not related to agricultural, forestry or countryside recreation uses are not explicitly supported in principle. Development proposals by charitable organisations currently require a significant burden of evidence to demonstrate the requirement for a countryside location. This includes the current proposal at Tiphereth.
- 1.26 The current wording of Policy ENV 10 does not clearly set out ...*circumstances in which development in the green belt can be supported* (as required by paragraph 181 of the adopted LDP). Further flexibility is required, and clear support for the range of uses and types of development where a countryside location is necessary and justified.
- 1.27 To address the above, it is proposed that Policy ENV 10 is amended to provide additional flexibility and to clarify that the principle of development is supported where a countryside location is necessary and justified. An amendment to the existing wording will provide clarity for applicants and the public on acceptable uses or development within the Green Belt or Countryside.
- 1.28 The proposed amended wording to criterion a) of Policy ENV 10 is as follows:
- a) *For the purposes of agriculture, woodland and forestry, horticulture, countryside recreation, and charitable organisation, or where a countryside location is necessary and justified, and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.*
- New development or uses where a countryside location is justified can include development on land associated with existing operations already located in the Green Belt or countryside provided the new development does not adversely impact on Green Belt objectives.*
- 1.29 The proposed amended wording for Policy ENV 10 of the adopted LDP will provide more clarity on the interpretation of what constitutes an acceptable development or use within the Green Belt or Countryside.
- 1.30 The amended wording will ensure that new proposals or development relating to existing operations that continue to require a countryside location can be supported under the emerging *City Plan 2030*.



1.31 The supporting text to Policy ENV 10 should also be reviewed to suitably define appropriate circumstances in which the Council considers a countryside location is necessary and justified. This should include instances where it is demonstrated that a proposed appropriate use cannot be undertaken in an urban location. For example, where being located within an urban location will adversely impact upon the operation of the proposed use or development.

1.32 The inclusion of the above within the emerging *City Plan 2030* will ensure that appropriate uses or development within the Green Belt or Countryside that have an evidenced need for a countryside / rural location can be supported by the Council.

### **Summary**

1.33 It is proposed that the Council amends part of the current wording of Policy ENV 10 *Development in the Green Belt and Countryside* within the emerging *City Plan 2030* to clarify its interpretation to assist existing business operations in the Green Belt.

1.34 The current wording of Policy ENV 10 requires to be amended for the following reasons:

- The current wording of the Policy does not define what the Council considers are types of uses or development where a countryside location is necessary and justified.
- The current wording of the Policy does not support new proposals located on land associated with existing operations where a countryside location is necessary and justified.

1.35 Amending the supporting text to Policy ENV 10 will help to define the additional operations, types of uses or additional development where a countryside location is necessary and justified and the principle of development is supported.