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Grounds of Appeal

Site at Kirkton Cottage, Alves

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CONTENTS

1.0. Introduction

2.0. Summary

3.0. Background

4.0. The Proposal

5.0. The Site

6.0. Development Plan Context

7.0. Main Issues

8.0. Reasons for Refusal

9.0. Conclusion

Appendices – separate document:

Appendix 1: Decision Notice 18/00862/APP

Appendix 2: Circular 4/2009 – Development Management Procedure (Annex A)

Appendix 3: Moray Local Development Plan- Extracts

- Policy H7 Housing in the Countryside
- Policy IMP1 Developer Requirements
- Policy T2 Provision of Access
- Policy T5 Parking Standards
- Policy EP5 Surface Water Drainage: Sustainable Urban Drainage Systems (SUDS)
- Policy EP10 Foul Drainage

Appendix 4: Guidance Note on Landscape and Visual Impacts of Cumulative Build Up of Houses in the Countryside

Appendix 5: Scottish Planning Policy- Extracts

Appendix 6: Planning Advice Note (PAN) Housing in the Countryside

1.0 Introduction

These grounds for review of a decision to refuse planning permission for a dwellinghouse on land adjacent to Kirkton Cottage, Alves are submitted under section 43A of the Town and Country Planning (Scotland) Act 1997 (as amended). This notice of review has been lodged within the prescribed three month period from the refusal of permission dated the 1st of November 2018.

The grounds for review respond to the reasons for the refusal of planning permission and address the proposal in relation to Development Plan Policies and relevant material planning considerations as required by Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended).

2.0 Summary

The proposal under review is for a single house incorporating traditional features and finishes. The site is part of a group of 3 houses, a ruinous steading and 2 recently approved plots (where it is understood planning permission now exists in perpetuity).

The proposed house has been sited and designed to relate to the appearance and character of this grouping as required by Moray Council Local Plan policies. The site is extremely well defined and it is enclosed and screened by established trees/shrubs from the east with a substantial backdrop made up of existing buildings, mature planting and landform from all other views.

The Moray Local Development Plan encourages low impact and well-designed development in the countryside. Local Plan policy H7 (the lead policy for assessing new houses in the Countryside) allows for single new houses provided they are on sites with a specific level of boundary definition, do not constitute obtrusive development and, when added to an existing grouping, do not detract from the appearance and character of existing buildings or their surrounding area.

The site has the required boundary definition, it is not one of the examples of an obtrusive site referred to in the policy and is extremely well assimilated into the existing grouping, and screened from view, by both the adjacent existing houses, and existing tree/shrub planting. Consequently, it is submitted that the proposal in hand to add another house to an existing, well integrated group is reasonable and compliant with the development plan because it relates well to the established settlement pattern. The modest scale and appearance of the proposed dwelling coupled with the implementation of a long term landscaping plan will protect and enhance the important amenity value of the area.

The reasons for refusal cite obtrusive development and unacceptable build-up of development. This appeal statement shows beyond any reasonable doubt that the development does not meet with the definition of obtrusive development which is contained within policy H7 nor does the introduction of a single house, to consolidate an existing grouping, with all the advantages that brings to servicing new housing the countryside, lead to an unacceptable build-up of residential development such that would detract from the rural character of the area. This latter is demonstrated by using the Council's own criteria contained within the recently published Guidance Note on the Landscape and Visual Impacts of Housing in the Countryside.

The Planning Act requires planning applications to be dealt with in accordance with policy unless there are material considerations to justify doing otherwise. As this proposal complies with policy and there are no material considerations to the contrary, it is concluded that the planning application should be approved.

3.0 Background

The application was made valid on the 13th of July 2018 and was refused under the Council’s Scheme of Delegation by the case officer on the 1st of November 2018. The reasons for refusal (Appendix 1) state that;

The proposal is contrary to Policies PP1, H7 and IMP1 of the adopted Moray Local Development Plan 2015 and, as a material consideration, the associated Supplementary Guidance: Housing in the Countryside, whereby

- a) individually, the proposal would not integrate sensitively with the surrounding area where, given the open setting of the site on part of an agricultural field, any resultant dwelling thereon would appear as an obtrusive and conspicuous form of development and, in addition, the site lacks sufficient backdrop, screening and enclosure to mitigate the impact of the development and assist in its integration sensitively into the surrounding landscape; and*
- b) cumulatively, the introduction of an additional dwelling would contribute to the further build-up of development in the locality and thereby, it would detract from, and be detrimental to, the character, appearance and amenity of the surrounding rural area within which it is located.*

3.0 The Proposal

The proposal is for a single dwelling served by the public water supply and private drainage (septic tank/soakaway and SUDS). Access will be from the Unclassified Road that bounds the site to the north.

The design of the proposed house is single storey incorporating features and finishes that result in a traditional appearance. Existing trees within the applicant’s wider ownership will be retained and supplemented with high quality new planting as per the plans.

4.0 The Site

The site is located immediately to the west of an established cluster of buildings and approved plots (refs: 17/01578/APP & 18/00191/APP) - these buildings and the larger site appear separate from the surrounding countryside being an enclosed area of ground surrounded on two sides by field boundaries, and the public road to the north. This well-defined boundary within which the subject site sits constitutes a long established and accepted feature in the landscape.



Furthermore, there are no environmental designations (National or International) covering the site and no archaeological/ historic interest has been identified. There is not considered to be any flood risk at the site.

5.0 Development Plan Context

The Development Plan for Moray comprises the Moray Local Development Plan 2015 and its associated Supplementary Guidance. The Planning Act requires planning applications to be determined in accordance with the Development Plan unless there are “material considerations” to justify doing otherwise.

Scottish Government Circular 4/2009 (Appendix 2) describes how planning applications should be determined when balancing the Development Plan and material considerations. It sets out the following approach;

- Identify the provisions of the development plan which are relevant to the decision;
- Interpret them carefully, looking at the aims and objectives of the plan as well detailed wording of policies;
- Consider whether or not the proposal accords with the Development Plan,
- Identify and consider relevant material considerations for and against the proposal, and
- Assess whether these considerations warrant a departure from the Development Plan.

The provisions of the circular are important in the context of this application because the appellants consider the proposal to be in full accordance with the Development Plan and that there are no material considerations that would warrant the refusal of this application.

Moray Local Development Plan 2015

Policy H7 Housing in the Countryside (Appendix 3, page 8) contains a general presumption in favour of small scale housing developments in the countryside provided the prescribed siting and design of the proposal are in accordance with the following criteria;

Siting

- It reflects the traditional pattern of settlement in the locality and is sensitively integrated with the surrounding landform using natural backdrops, particularly where the site is clearly visible in the landscape. Obtrusive development (i.e. on a skyline, artificially elevated ground or in open settings such as the central area of a field) will not be acceptable;
- It does not detract from the character or setting of existing buildings or their surrounding area when added to an existing grouping or create inappropriate ribbon development;
- It does not contribute to a build-up of development where the number of houses has the effect of changing the rural character of the area. Particular attention will be given to proposals in the open countryside where there has been a significant growth in the number of new house applications; and;
- At least 50% of the site boundaries are long established and are capable of distinguishing the site from surrounding land (e.g. dykes, hedgerows, fences, watercourses, woodlands, tracks and roadways).

If the above criteria for the setting of the new house are met, the following design requirements then apply:

Design

- A roof pitch between 40-55 degrees;
- A gable width of no more than 2.5 times the height of the wall from ground to eaves level (see diagram 2);
- Uniform external finishes and materials including slate or dark ‘slate effect’ roof tiles;
- A vertical emphasis and uniformity to all windows and doors;

- Boundary demarcation that reflects the established character or style (e.g. dry stone dykes, hedges) in the locality;
- Proposals must be accompanied by a landscaping plan showing an appropriate proportion of the plot, generally 25%, to be planted with native tree species at least 1.5 metres in height.

The siting and design criteria in Policy H7 are supplemented by the general criteria based Policy IMP1 – Development Requirements (Appendix 3, page 10). This policy has a range of requirements applicable to all new development including that;

- scale, density and character must be appropriate to the surrounding area;
- development must be integrated into the surrounding landscape.

In addition, there are a range of other policies relating to infrastructure and servicing which seek to ensure that new development is provided with a safe and suitable access, adequate car parking and adequate surface and foul drainage, namely;

- T2: Provision of Access (Appendix 3, page 11);
- T5: Parking Standards (Appendix 3, page 12);
- EP5: Surface Water Drainage (Appendix 3, page 13);
- EP10: Foul Drainage (Appendix 3, page 14);

More recently, a Guidance Note on Landscape and Visual Impacts of Cumulative Build Up of Houses in the Countryside has been prepared (Appendix 4). This additional guidance supports Policy H7 - Housing in the Open Countryside and associated Supplementary Guidance and is a material consideration when assessing housing in the countryside proposals, specifically where build up is one of the determining issues.

National Planning Policy and Guidance

National Planning Policy and Guidance is a material planning consideration to be taken into account in the consideration of planning applications. It is set out in Scottish Planning Policy (SPP) and Planning Advice Notes (PAN's).

Scottish Planning Policy 2014 (Appendix 5)

Scottish Planning Policy (SPP) sets out the Scottish Governments overarching policy on land use planning. SPP advises that Planning should take a positive approach to enabling high quality development and making efficient use of land to deliver long term benefits for the public, while protecting and enhancing natural and cultural resources.

With respect to rural development, SPP states that the planning system should promote a pattern of development that is appropriate to the character of the particular rural area.

Planning Advice Note 72 (PAN72) – Housing in the Countryside (2005) (Appendix 6)

PAN72 starts by recognising the changing circumstances in the countryside and points out that one of the most significant changes in rural areas has been a rise in the number of people wishing to live in accessible parts of the countryside while continuing to work in towns and cities within commuting distance. It contains guidance in some detail on how to achieve a successful development in the countryside. The PAN acknowledges that there will continue to be a demand for single houses, often individually designed, but these have to be planned, with location carefully selected and design appropriate to the locality.

The PAN gives advice on location within the landscape and specifically states that housing related to existing groups will usually be preferable to new isolated development. It requires new housing in small groups to

avoid a suburban appearance, by being sympathetic in terms of orientation, topography, scale, proportion and materials to other buildings in the locality (Appendix 6, page 17).

Setting a building against a backdrop is identified in the PAN as one of the most successful means by which new development can blend with the landscape. However it also states that the purpose of new planting is not to screen or hide new development, but to help integration with the surrounding landscape. The PAN also cautions against skyline development and heavily engineered platforms (Appendix 6, page 18).

6.0 Main Issues

There is a clear commitment in National Planning Policy and Guidance and the Moray Local Development Plan to the principle of well sited and designed new housing in the countryside. There is particular support for houses related to existing groups as is the case with the site under appeal.

Policy H7 is the lead local policy in the consideration of this proposal; its stated aim being to allow housing in the open countryside that can be easily absorbed into the landscape. It sets out four specific criteria under the heading of 'siting' which have to be met to secure the principle of development.

Firstly, the proposed site should reflect the traditional pattern of development in the locality and does not constitute obtrusive development. The settlement pattern in this area of Moray is characterised by single and small groups of houses and outbuildings dispersed throughout the rural area. As such, the introduction of a dwelling which rounds off and consolidates an established housing group set in this wider scattering of houses and agricultural buildings can be seen to reflect the established settlement pattern.

In addition, the site does not meet with the Council's definition of obtrusive development i.e. on a skyline, artificially elevated ground or in open settings such as the central area of a field. Once built, it will not be possible to view this modest structure on the skyline from the surrounding countryside, and the house will not be built on artificially elevated ground (conditions relating to finished floor levels can be imposed to ensure control is retained over this matter). The landscape and visual impact of the project is demonstrated in detail in Section 7.

The second element of the siting criteria states that the proposed development should not detract from the character or setting of existing buildings or their surrounding area or create inappropriate ribbon development. The proposed plot is very well related to the size and characteristics of existing and approved plots to the East. In this position, it will effectively round off this small group of houses and buildings, the field boundary to the west providing a natural break to development. Taken together, once all plots are developed they will have the benefit of similar landscaped grounds within which the proposed houses will be contained, which will soon mature and integrate the developments into their rural surrounds.

The proposed house has been positioned within the plot to keep it well apart from existing properties and approved plots and the relationship between the size of the house and the plot is consistent with that of the relationship between the size of nearby houses and plots. As a result, the proposal will relate very well to the character and setting of the existing small grouping of houses. In the proposed position, there is little or no impact on the character or setting of these properties nor will it give rise to detriment upon neighbouring amenity (privacy, prejudice to sunlight/ daylight etc). On the basis of the above, it cannot reasonably be concluded that the proposed development detracts from the character or setting of existing buildings, the surrounding area or results in inappropriate ribbon development.

The third of the siting criteria states that new housing in the countryside should not contribute to a build-up of development where the number of houses has the effect of changing the rural character of the area. The submitted plans clearly demonstrate that the addition of one dwellinghouse in this location, with the proposed

separation between buildings, and natural break to any further development to the west, will not have this effect nor will it contribute to this effect in the future.

Finally, the site should have at least 50% of its boundaries as long established features capable of distinguishing it from the surrounding land. Examples of acceptable boundaries are listed as dykes, hedgerows, fences, watercourses, woodlands, tracks and roadways. The proposed development meets and exceeds the boundary requirements prescribed through the existing field boundary.

Although the proposed design of the property is not identified as an issue in the reasons for refusal, there are a series of specific design requirements within policy H7 which are all met by the proposal;

- A roof pitch between 40-55 degrees;
- A gable width of no more than 2.5 times the height of the wall from ground to eaves level
- Uniform external finishes and materials including slate or dark 'slate effect' roof tiles;
- A vertical emphasis and uniformity to all windows and doors;
- Boundary demarcation that reflects the established character or style (e.g. dry stone dykes, hedges) in the locality;
- Proposals must be accompanied by a landscaping plan showing an appropriate proportion of the plot, generally 25%, to be planted with native tree species at least 1.5 metres in height.

In addition to the criteria set out in policy H7 and its associated supplementary guidance, a guidance note on Landscape and Visual Impacts of Cumulative Build Up of Houses in the Countryside has been prepared, and is a material planning consideration in the assessment of housing in the countryside proposals, specifically where build up is one of the determining issues.

This guidance sets out criteria i.e. siting and design indicators to help identify the conditions when build up is an issue and this criteria assists the decision maker in determining whether a proposal has an unacceptable impact in terms of build-up. The appellant contends that when this guidance is applied to the proposed development, that the prevailing conditions pertaining to the site and its surrounds do not constitute unacceptable build up. The proposal is compared to the prescribed siting and design indicators towards the end of section 7 below.

Overall it is considered that the proposal is exemplary in this regard and therefore meets the requirements of Policy H7 and the related Supplementary Guidance on Housing in the Countryside. In doing so it also satisfies the requirements of Policy IMP1 which requires development to be integrated into the landscape and of a character appropriate to the surrounding area.

7.0 Reasons for Refusal

The first reason for refusal states that, *"individually, the proposal would not integrate sensitively with the surrounding area where, given the open setting of the site on part of an agricultural field, any resultant dwelling thereon would appear as an obtrusive and conspicuous form of development and, in addition, the site lacks sufficient backdrop, screening and enclosure to mitigate the impact of the development and assist in its integration sensitively into the surrounding landscape;"*

In short, the Appointed Officer concludes that the site constitutes obtrusive development. We recognise that there are intermittent views of the site from the surrounding area however, we strongly disagree with the appointed officers conclusions that the proposed dwelling would appear as an obtrusive and conspicuous form of development- please also note that this is also a significant departure from the interpretation of 2 previous planning officers in relation to adjacent approvals under references 17/01578/APP & 18/00191/APP.

Obtrusive development is defined in lead policy H7 as development which is “on a skyline, artificially elevated ground or in open settings such as the central area of a field”. For the avoidance of any doubt the proposal at hand does not meet with any of these criteria therefore, in respect to planning policy, this proposal cannot reasonably be considered to constitute obtrusive development.

The subject site forms part of a small cluster of existing buildings and approved plots. It is very well defined from the surrounding countryside through a combination of its boundary treatments and historic management. This area of ground has been used as a set down area and has not been subject to the same agricultural practices as the fields which bound it therefore, it is not read as part of the surrounding farmland when viewed in the landscape. It is read in the landscape as part of the existing group of houses and buildings.

Furthermore, the site does not constitute obtrusive development on the basis that it is not located in the central area of the field and subsequently, we would strongly contend that the subject site more than meets with all of the criteria set out in planning policy for the sensitive siting of residential development in the countryside. We conclude that from key views the site benefits from a substantial backdrop, which together with the implementation of a long term landscaping scheme will enable this development, alongside those already approved, to integrate swiftly and sensitively into its rural surrounds. The applicant would welcome the imposition of an appropriately worded planning condition to ensure early delivery of planting, if Members were so minded.

The following annotated photographs will show beyond any reasonable doubt that the site does not constitute an obtrusive and conspicuous form of development from key views, and thereby demonstrates the conclusions reached by the appointed officer in his assessment of the proposal to be improper;



Annotated photographs have been provided from the above locations.



Viewpoint 1 – long distance view of the site with backdrop of trees and buildings. The site appears in the landscape as part of an existing cluster of buildings in all views from the south west.



Viewpoint 2 – the distance diminishes clear views of the site from this section of the road. Members will also notice that it does not appear on the skyline and is read as part of an existing group of buildings/ approved plots.



Viewpoint 3 – a closer view from the adjacent road shows that the proposed development would be nestled into the site with a backdrop of landform to the south. The mature planting to the east ensures that site arrangements would not appear prominently in this view.



Viewpoint 4 – there are very limited views of the site from the north, as is demonstrated above. Therefore, the site cannot constitute obtrusive or conspicuous development from this direction.



Viewpoint 5 – this view shows the site with a backdrop of landform and also in the context of the existing housing group with clearly defined boundaries. Together with the approved plots to the immediate east, it becomes clear that the subject site is ideally located in the landscape and will integrate sensitively into its rural surrounds, once established.



Viewpoint 6 – From this view, the site benefits from a substantial backdrop of landscape and is once again very well defined from adjacent farmland. The implementation of a long term landscaping scheme will concentrate on views from this direction to ensure the proposed development, and adjacent approved plots, quickly integrate into their surroundings.



Viewpoint 7 – views of the site further to the south east are diminished by the intervening distance. The site maintains a substantial and effective backdrop from all views to the south east.

On the basis of this evidence, we would strongly contend that the proposal benefits from a substantial backdrop in all views and the coherent visual relationship between the proposal and the existing group of houses/ buildings/ approved plots mean that a recommendation of refusal based on an adverse visual or landscape impact is highly questionable. In fact, the appellants would contend quite the opposite; that a domestic structure on this site can be accommodated sensitively and the proposed development can be seen to compliment the wider dispersed settlement pattern, respect and reflect the separation and amenity of existing houses and once established will integrate successfully with its surroundings.

The prevailing characteristics of the site and its relationship with its rural surrounds mean the conclusions reached by the appointed officer in the second reason for refusal are quite surprising. The thrust is that the addition of a single dwelling in this location would result in unacceptable build up and that consequently, it would detract from, and be detrimental to, the character, appearance and amenity of the surrounding rural area.

The Moray Council's Housing in the Countryside policy offers a flexible approach to ensure appropriate opportunities are enabled and supported and inappropriate development guarded against. It is submitted that the proposal in hand to add another house to an existing, well integrated group is reasonable and compliant with the development plan because it relates well to the established settlement pattern. The modest scale and appearance of the proposed dwelling coupled with the implementation of a long term landscaping plan will protect and enhance the important amenity value of the area.

It is important to note that the introduction of a house onto this site is in full accordance with PAN72 because it adds to an existing grouping and owing to its coherent relationship with existing properties does not detract from its rural character. The guidance reiterates the importance of locating new houses in existing groups in relation to sustainable development criteria such as location and infrastructure needs. The consolidation of an existing housing group in the way proposed, with all the servicing benefits associated with such a project, point to a well-balanced development that deserves the support of the Local Authority.

Moray Council has recently introduced a Guidance Note on the Landscape and Visual Impacts of Housing in the Countryside (Appendix 4). This guidance is a material consideration in addition to policy H7 and its associated supplementary guidance and focuses on the landscape and visual impacts associated with the build-up of

housing in the Moray countryside. It seeks to assist the decision maker in determining when build up becomes unacceptable and is of particular relevance in this case in the context of the appointed officer's second reason for refusal. The guidance gives us the opportunity to determine whether unacceptable build-up of development has occurred in a planning policy context, by testing the proposal against the various criteria set out in the guidance.

There are two separate parts to this guidance. One part focuses on 8 areas identified as housing in the countryside hotspots where cumulative build up is already prevalent. As the subject site is not within and does not share characteristics with any of these high pressure areas, this portion of the guidance does not apply.

Outwith these areas, the guidance sets out cumulative build up indicators to identify build up and determine when it becomes unacceptable. The premise is that cumulative build up is an issue throughout the area so the guidance contains a number of siting and design indicators to help the decision maker identify an uncharacteristic build-up of houses that threatens to erode the distinctive qualities of rural Moray.

In this context, the applicants strongly contend that the proposed development does not detract from the character, appearance or amenity of the surrounding rural area. The following sections set out the indicators contained within the recently published guidance, and measures how the proposal at hand relates to them;

Siting Indicators (Appendix 4, page 3)

The number of new houses overwhelms the presence of older buildings, such that the new houses are the predominant components of the landscape and the traditional settlement pattern is not easy to perceive.

The prevailing settlement pattern is particularly straightforward to perceive in this part of the district i.e. single and small groups of houses and farm buildings dispersed throughout the rural area. The introduction of a new dwelling to an existing small, cohesive group of buildings and approved plots respects the traditional settlement pattern. In this position, the modest dwelling proposed would benefit from a backdrop of landform, mature planting and built form from key views. Consequently, the scale of the proposed development will not overwhelm its landscape setting nor will it overwhelm existing buildings within the group.

The incidence and inter-visibility of new houses result in these being a major characteristic of the landscape. There is a prominence of new houses from key viewpoints such as roads, adopted core paths or long distance paths and existing settlements.

The addition of a single dwelling to an existing, well established group of buildings in the Moray countryside will not result in built form being a major characteristic of the landscape. What is proposed here is the sensitive, small scale expansion of an existing group of houses and buildings. Once established, the effect of the development in landscape terms would be negligible.

Furthermore, this is not a prominent site from key viewpoints. This is demonstrated in the preceding section.

There are sequential visual effects of cumulative build-up of new housing experienced when travelling along roads in the vicinity of the site. The proposal contributes to ribbon development between existing/consented houses contrary to the traditional dispersed settlement pattern.

The proposed development does not constitute ribbon development nor is the consolidation of an existing group of houses contrary to the traditional dispersed settlement pattern- to the contrary the proposed development can be seen to reinforce the prevailing traditional settlement pattern. In addition, the separation between the site and existing houses within the group respects that of the existing group and reflects traditional, high quality siting in the Moray countryside. All of this means that the experience of road users, in terms of the cumulative build-up of houses, remains unchanged.

In this case, although all applications are assessed on their own individual merits, Member's should take comfort that the access track to the North West and the public road provides a natural break to development which will preclude the extension of this group further into the countryside. The appellants have sought

planning permission on this site so that they can be located near to their existing business enterprise- although this is not prescribed in the criteria enabling housing in the countryside in Moray, Member's should be aware that the approval of this application will support an existing well established rural business. On account of all these factors, there is clearly significant material weight in favour of siting the development in this location in the manner proposed.

Design Indicators (Appendix 4, page 3)

In order to serve numerous new house plots in any given area, commonly suburban style features are required, such as accesses built to adoptable standards (rather than gravel tracks) and large bin storage areas at the end of tracks. These features erode the rural character of an area.

As is referred to by the appointed officer, there are 2 approved plots in the immediate vicinity of the subject site and the proposed development would be served by the same access arrangements. Whilst bin storage and collection would be as per the approved arrangements as well, the applicants have indicated that they would welcome the imposition of a appropriately worded condition to ensure that these arrangements would not have any undue impact on the character of the area.

The larger scale of new houses contrasts to generally smaller size of older building, cottages and farms results in the development being out of keeping and incongruous within the rural setting.

The proposed dwelling is modest in scale and relates well to traditional architecture in the Moray countryside and more specifically to the existing buildings with the group.

There are numerous incidences of open prominent elevations that are visible in the landscape and are orientated for views and in contrast to traditional settlement pattern.

The proposed development has been sited to respect the traditional settlement pattern rather than orientated to provide outward views. As a result, there would be no open prominent elevations visible from the surrounding countryside.

A new architectural design is prevalent which has overwhelmed the older vernacular style.

The proposed design successfully reinterprets the vernacular style inherent in high quality traditional architecture in the Moray countryside in a modern context.

In the appellant's view, owing to the above, the stance taken by the appointed officer in the second reason for refusal, i.e. that "*cumulatively, the introduction of an additional dwelling would contribute to the further build-up of development in the locality and thereby, it would detract from, and be detrimental to, the character, appearance and amenity of the surrounding rural area within which it is located*" is untenable.

8.0 Conclusion

As stated, the Planning Act requires planning applications to be determined in accordance with the Development Plan unless there are "material considerations" to justify doing otherwise.

National Planning Policy and the Moray Local Development Plan all encourage well sited and designed houses in the countryside and there is a preference for the siting of new houses within existing groupings; recent decisions demonstrate accordance with these aims and objectives so the applicants simply ask that this application be determined in the same manner.

The lead policy in the Local Plan for testing the acceptability of the site as a suitable location for a house in the countryside is Policy H7 and it contains specific criteria about the siting and design of new dwellings. These Grounds of Appeal and the submitted plans clearly show that the proposal is acceptable under the criteria set out in the policy, including all supplementary guidance. It has also been shown that the proposal is acceptable

in relation to other relevant Local Plan policies and guidance regarding landscape impact, design, provision of access, parking and drainage.

As the proposal can be accepted under Development Plan policies and there are no known material considerations to the contrary, it is respectfully requested that the Local Review Body reconsider the decision to refuse the proposed development and grant planning permission.