

# grant and geoghegan

planning · development and architectural consultants

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Dear Mr Westmacott,

Thank you for your letter dated the 24<sup>th</sup> of August 2016. The appellant wishes to offer the following comments in response to the two additional representations received by the Moray Council.

The first matter to address is the assertion in both representations that the history of refusal on this site demonstrates that the site is unfit for its proposed use. In its proper context, the planning history associated with this site demonstrates that the appellant has previously sought to bring an area of agricultural land that has long been unsuitable for traditional farming practices into productive use, specifically the erection of housing for farm workers. In her latest representation, Mrs Trythall refers to a much longer history of refusal on this site that is actually the case; the correct planning history on this site reads as follows;

- 00/00865/FUL | Upgrade existing access road and erect 2 no farm workers cottages at | Plewlands Farm Duffus Elgin Moray IV30 5QS. Application withdrawn.
- 00/01630/FUL | Upgrade existing road and erect 2 no farm workers cottages at | Plewlands Farm Duffus Elgin Moray IV30 5QS. Application refused.

The previous proposals on this site bear no resemblance to the proposal under consideration, and the appellant simply asks that this application is assessed on its own individual merits in relation to the current development plan and relevant material considerations.

Following on from that, certain statements in the submitted grounds of appeal have unfortunately been taken out of context so it is necessary to clarify these points. To begin with, the term 'campsite' is used in the grounds of appeal as an adjective to describe the experience of visitors rather than the proposed land use. For the avoidance of doubt, planning permission is sought for the erection of 3 eco- style holiday chalets as depicted in the submitted plans. The appellant stresses that he has no intention of running a campsite in the way implied by the objectors and that in any case such an activity would require the express approval of the planning authority so is irrelevant to the consideration of this application.

Secondly, the objectors dispute the assertion that the site is 'low lying'. The site description is intended to depict the characteristics of the surrounding topography; the appellant clearly acknowledges in the submitted documents that the subject site is significantly higher than the golf course to the east but moves that the subject site is low lying in comparison to surrounding farmland.

Moving on, the appellant takes issue with Mrs B Hall's assertion that views from the south are irrelevant. SNH's Moray and Nairn Landscape Character Assessment states that this landscape character type is sensitive to new built form which detracts from the open character of views to the coast from adjacent areas. Views to the coast from adjacent areas are from the south in this location, so as the proposed development will not readily appear in views from the south it cannot reasonably be concluded that the proposal departs from SNH's interpretation of an unacceptable landscape impact.

The appellant would also add that the landscape has the capacity to absorb this modest development without detracting from its open character and giving rise to an unacceptable visual or landscape impact from public vantage points. Several photographs are appended to demonstrate the juxtaposition of the site from key views. It is contended that contrary to the comments of the appointed officer and objectors, the issue of prominence and landscape impact has been overstated. The proposed chalets have been sited and designed to avoid clear views of the development on the skyline from the golf course and the surrounding topography restricts views of the site from the public road, the core path to the north and the housing to the west. It is also important to note that the existing vegetation around the site will be retained and that the implementation of a long term landscaping scheme will further integrate the structures into their surroundings as well as enhancing the variety of plant and animal species in and around the site over time.

Finally, and in response to Mrs Trythall's statement that the proposals do not constitute agricultural diversification, please note that the appellant is a third generation farmer, that the subject site forms part of his landholding, and that the proposed holiday chalets are intended to contribute to the overall business. It is contended that the proposed development is clearly diversification of an existing, well established agricultural operation.

It is important to note that none of the Local Development Plan policies cited by the case officer preclude the proposed development on their own, or cumulatively, rather prescribing criteria to ensure that any change is managed sensitively. This project has been devised by the appellant with the natural attributes of the subject site in mind to ensure that the proposed development can be integrated sensitively, and whilst he welcomes constructive comments from neighbouring residents he is not of the opinion that any of the matters raised truly reflect the low key nature of the proposed development. However, the proposed development will undoubtedly have an enormous positive impact on Moray's role as a tourist destination. In this context, the appellant firmly believes that the proposed development is positive in all respects and deserves the support of the Moray Council.

The appellant considers the remaining points within these representations to be addressed in detail in the submitted Grounds for Appeal.

Please do not hesitate to contact me should you need any further information.

Stuart Morrison  
grant and geoghegan



View to the south from the public road at the existing access



View from the former Clubhouse site





High level view from Golf Course access road



View from row of residential properties to the west