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SUPPORTING DOCUMENT 006

F.A.O Lissa Rowan

Clerk to:

The Moray Council Local Review Body

Economic Growth & Development
The Moray Council
High Street
Elgin
IV30 1BX

Tuesday 21st March 2023

Dear Sir / Madam

NOTICE OF REVIEW **22/01066/APP 35 Gordon Street, Portgordon AB56 5QR**

On behalf of the applicant of Planning Application 22/01066/APP we respond to the newly adopted NPF4 as advised in Clerk to the MLRB, Ms Rowan's letter 06.03.2023 LR/L284, with reference in particular to the Appointed Officer Response 02.03.2023

[statements & policy by others shown in blue italics]

Forwarded to us today 21st March 2023:

To: Lissa Rowan

From: Fiona Olsen

Sent: 02 March 2023 13:21

Subject: RE: LRB

As per the below I am advised to send you comments in relation to NPF4 for 22/01066/APP which will be heard at the next LRB.

Please see below: National Planning Framework 4 (NPF4) was adopted by the Scottish Ministers on 13th February 2023, following approval by the Scottish Parliament in January.

*The basic siting and design principles for householder developments continue to apply within **NPF4 Policy 16(g)**. Whilst NPF4 Policies 1, 2 and 16(h) strongly seek to address the global climate and nature crises and minimise greenhouse gas emissions, this requirement would not overcome the objections to the proposal (22/01066/APP) in terms of design.*

We wish to correct the Officers **misleading statement and highlight below the key NPF4** policy intent, as it goes beyond **just environmental issues**, in relation to the application and the supporting policy it embodies, which extensively **contradicts the Officers interpretation of NPF4 in their statement above** - we contest that an application has to embody many positive factors [NPF4] and a subjective view point of **'how it looks' hidden in a private area** is not one of them - Supporting Doc 003 page 10. NPF4 page 53.

NPF4 - POLICY 16g:

- g) Householder development proposals will be supported where they:
 - i. do not have a detrimental impact on the character or environmental quality of the home and the surrounding area in terms of size, design and materials; and

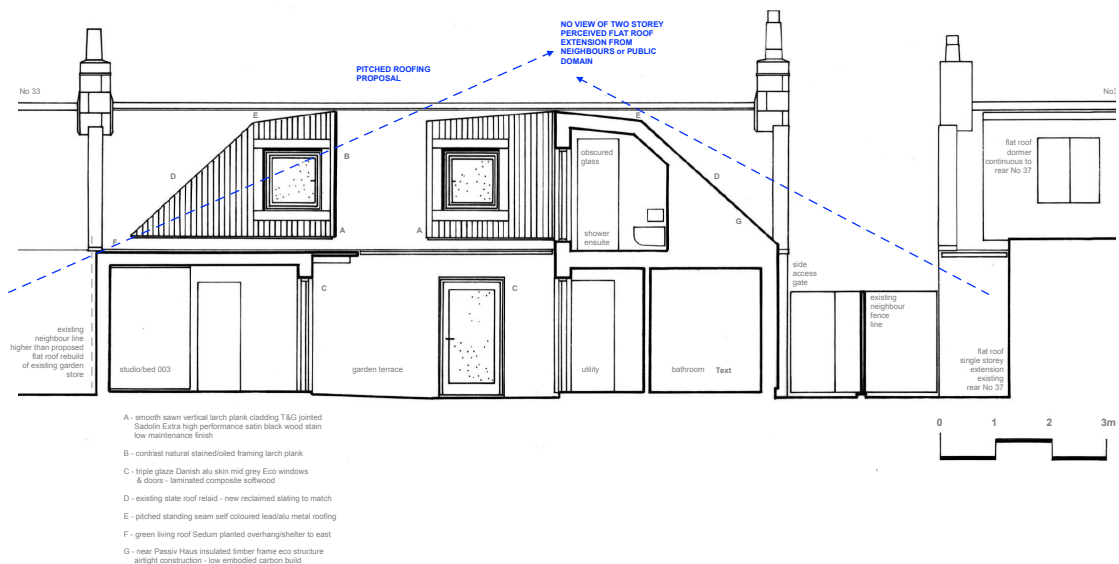
- the original character of the property is preserved, the historic positives are retained and the new proposals are clearly of the 21st C allowing the distinction between old and new elements to be clear.

- the extended areas are tiny, the new ground floor footprint is not part of the Dp1 reasons for refusal.

- ii. do not have a detrimental effect on the neighbouring properties in terms of physical impact, overshadowing or overlooking.

- we reiterate the proposal **cannot be seen from the neighbours on either side or from the public domain** - Supporting Doc 003 page 10.

- once again the Officer shows an ignorance of the site conditions and the proposal detail - only the small west pitched roof dormer can be seen - which is allowed under Permitted Development & from the neighbour to the east, the proposal is visible as only a pitched slate roof. Both neighbours fully support the proposals.



NPF4 fundamentally supports the application 22/01066/APP - as every policy has an equal weight in a determination.

The application proposal embodies requirements of NPF4:

- revised layout & renovation to allow inclusive living for elderly family members
- high quality environmental refurbishment of near passive Haus quality
- renovation using sustainable materials & low embodied carbon methodology
- reusing an empty property as 21st C family accommodation in a village setting

NPF4 is a policy that supports the application & wholly fosters:

- inclusiveness for all & all generations **NPF4** page 14 Policy 16, page 19
- environmental protection **NPF4** page 2, 8, 14, 22, 36-37, 63 Policy 1, 2
- renovation & renewal **NPF4** page 59 policy 14
- regeneration of communities **NPF4** page 11, 14, 19, 28, 37, 50, 59, 64 Policy 1

The application 22/01066/APP embodied all those aspects:

- see the **Supporting Document 003 DAS** page 11 regarding our inclusiveness statement
- see the **Supporting Document 003 DAS** pages 13/14/15 regarding our Environmental Protection
- see the **Supporting Document 003 DAS** page 13 regarding Renovation & Renewal
- the very nature of the **regeneration of an empty property** with modest extension through a full renovation is to give the property a new generation of occupants a home - regenerating community - **Supporting Document 001**.

We always try to be forward thinking, adopting emerging policy & work ahead of new Planning Policy.

We welcome here the new intent of the NPF4. NPF4 was fully embodied in the principles of our application - Moray Planning Officers miss the fact that **all policy aspects carry equal weight when determining an application** and try to single out DP1 to subjectively quash an application that they **'don't personally like the look of'**.

The use by Moray Planning of a subjective view point of an irregular roofs cape as: **'we don't like the look of it'**, does not carry weight within the historic DP1 Moray Planning Policy or the new NPF4, particularly of a proposal that **cannot be seen by neighbours or from a public space**.

We show below the key elements of **NPF4** that overwhelmingly support the application.

EXTRACTS NPF4 *[key supporting policy emboldened]:*

On page 02 of the NPF4 document the Ministerial foreword states the intent of NPF4 is:

To improve people's lives by making sustainable, liveable and productive places.

Putting the twin global climate and nature crises at the heart of our vision for a future Scotland will ensure the decisions we make today will be in the long-term interest of our country.

People care about their neighbourhoods and rightly and reasonably expect that new development should improve their lives, rather than undermining what they value most. To help deliver on this strategy

A fairer and more inclusive planning system will ensure that everyone has an opportunity to shape their future so that our places work for all of us

Spatial principles

We will plan our future places in line with six overarching spatial principles:

- Just transition. We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.*
- Conserving and recycling assets. We will make productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy.*
- Local living. We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, green space, learning, work and leisure locally.*
- Compact urban growth. We will limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.*
- Rebalanced development. We will target development to create opportunities for communities and investment in areas of past decline, and manage development sustainably in areas of high demand.*
- Rural revitalisation. We will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.*

By applying these spatial principles, our national spatial strategy will support the planning and delivery of:

- **sustainable places, where we reduce emissions, restore and better connect biodiversity**
- **liveable places, where we can all live better, healthier lives; and**
- **productive places, where we have a greener, fairer and more inclusive wellbeing economy.**

Page 08

REDUCING GREENHOUSE GAS EMISSIONS

Our strategy and policies support development that helps to meet greenhouse gas emissions targets. The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment.

Page 10

Many people need better places to support their lifelong health and wellbeing and build their future resilience. In recent years communities have found ways to work together to find local solutions to shared challenges. However, the cost crisis is again underlining the need for our future buildings and places to do more to support our long-term resilience.

Reuse of and extending existing property through imaginative and placemaking design is embodied in:

Page 11

Delivery of good quality, affordable homes - we will promote compact urban growth. Higher density development which will help to sustain public transport and support local living

We want to make better use of our spaces to support physical activity, relaxation and play, to bring people together and to celebrate our culture, diversity and heritage

Our strategy is to value, enhance, conserve and celebrate our places and to build better communities for future generations. A stronger commitment to placemaking, through a design-led approach and a focus on quality, will ensure every new development improves the experience of our places.

Page 14

Policy 16 supports the delivery of high quality, sustainable homes that meet the needs of people throughout their lives. In particular, it supports proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and

which address identified gaps in provision. This could include: accessible, adaptable and wheelchair accessible homes; homes that meet the needs of older people; a range of size of homes; and other specialist groups.

The majority of older people want to remain in their home as they age, preferring mainstream housing, and so accessible and adaptable homes can allow people to continue to live independently. The close alignment of planning and housing delivery at the local level, through LDPs and Local Housing Strategies, will help to deliver the right type and mix of homes in the right locations. In addition Housing to 2040 sets out a commitment to Scottish Accessible Home Standard in 2025/26.

Development that provides homes to meet the needs of older people and disabled people will be further promoted by LDPs. Evidence reports will explain the action taken to support and promote the construction and/ or adaptation of homes to meet their needs.

Page 19

LIFELONG HEALTH AND WELLBEING

Our strategy and policies support development that helps to improve health and wellbeing. The spatial strategy as a whole recognises that there are significant health inequalities in Scotland that future development can help to address. The spatial principles aim to ensure that future development is directed to sustainable locations, recognising that the role of planning in supporting development in places which would benefit most from regeneration and investment.

We embody in the application a reduction in surface water run-off:

Policy 22 ensures that future flood risk is not exacerbated by development, and facilitates the delivery of sustainable flood risk management solutions. Policy 10

manages development to reflect future vulnerability of coastal areas. Policy 9 encourages the redevelopment of brownfield land, helping to reduce the impact of vacant and derelict sites on communities.

Page 25

North

The Highlands of Scotland, Moray, mainland Argyll, northern parts of rural Stirling and Perthshire are world renowned for their stunning landscapes, rich biodiversity and cultural heritage.

Settlement patterns vary, from dispersed or low density crofting townships, to key centres such as Inverness, Ullapool, Dingwall, Grantown-on-Spey, Aviemore, Elgin, Pitlochry and Aberfeldy

Parts of the area have recently experienced an accelerated increase in house prices. The pandemic has reinforced long standing issues of affordability and a more mobile remote workforce has been attracted to the area, adding increased pressure. Without intervention, access to affordable homes, jobs and services that enable local people, including young people, to stay in their communities could become more challenging. Fuel and transport poverty is a particular challenge towards the north and west and there are significant areas which do not currently benefit from good quality digital connectivity.

The area's environmental quality, culture, language, landscape and wildlife sustain key economic sectors including tourism, food and drink, distilling and clean energy. Extensive areas of woodland and peatland act as a carbon sink, contributing significantly to our national sustainability. The area has a strong economy with growing income and low

unemployment overall, but there remain pockets of deprivation both in urban areas and in more remote areas where there is a need for alternatives to low skilled and low paid jobs.

The reuse of an existing property in a rural location is embodied in the application:

Page 28

Affordability and choice of homes is acute across the area, especially within Aberdeen. The growing proportion of retirees in Aberdeenshire presents a further challenge to housing and service delivery. There are lower levels of educational attainment and limited access to services for communities along the Aberdeenshire and Moray coast. Many of these places will benefit from further regeneration that builds on their identity and natural assets.

The excellent quality of the built environment, natural assets and cultural heritage already contribute to health and wellbeing in the area

National Planning Framework 4

Page 28 and can form the basis of a transition to net zero.

Page 36

Local Development Plans:

LDPs must address the global climate emergency and nature crisis by ensuring the spatial strategy will reduce emissions and adapt to current and future risks of climate change by promoting nature recovery and restoration in the area.

The reuse of an existing property in a rural location is embodied in the application:

Policy 1

When considering all development proposals significant weight will be given to the global climate and nature crises.

Policy impact:

Just Transition

Conserving and recycling assets

Local living

Compact urban growth

Rebalanced development

Rural revitalisation

Page 37

Local Development Plans:

The LDP spatial strategy should be designed to reduce, minimise or avoid greenhouse gas emissions. The six spatial principles should form the basis of the spatial strategy, helping to guide development to, and create, sustainable locations. The strategy should be informed by an understanding of the impacts of the proposals on greenhouse gas emissions.

LDPs should support adaptation to the current and future impacts of climate change by taking into account climate risks, guiding development away from vulnerable areas, and enabling places to adapt to those risks.

Policy 2

a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.

b) Development proposals will be sited and designed to adapt to current and future risks from climate change.

We embody sustainable renovation and regeneration in the application:

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Policy Intent:

To encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.

Policy Outcomes:

- Emissions from development are minimised; and***
- Our places are more resilient to climate change impacts.***

c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.

Page 50

Policy Intent:

To encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development.

Policy Outcomes:

- Development is directed to the right locations, maximising the use of existing assets and minimising additional land take.***
- The contribution of brownfield land to nature recovery is recognised and opportunities for use as productive green space are realised where appropriate.***

- Derelict buildings and spaces are regenerated to improve wellbeing and transform our places.***

Policy 9

a) Development proposals that will result in

the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported. In determining whether the reuse is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account.

d) Development proposals for the reuse of existing buildings will be supported, taking into account their suitability for conversion to other uses. Given the need to conserve embodied energy, demolition will be regarded as the least preferred option.

The scheme design acknowledges that there is no impact on neighbours, the roof level additions that the Moray Planning Officers dislike are not visible from any public or neighbour properties:

Page 53

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;

ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

iii. public access, including impact on long distance walking and cycling routes and scenic routes;

iv. impacts on aviation and defence interests including seismological recording;

v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;

vi. impacts on road traffic and on adjacent trunk roads, including during construction;

vii. impacts on historic environment;

viii. effects on hydrology, the water environment and flood risk;

ix. biodiversity including impacts on birds;

x. impacts on trees, woods and forests;

xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;

xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and

xiii. cumulative impacts.

The proposals are designed not to impact on neighbours, cannot be seen from public areas and improve the. Quality of space and volume within the host dwelling to benefit the future occupants:

Design, quality and place Policy Principles

Policy Intent:

To encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

Policy Outcomes:

- Quality places, spaces and environments.***
- Places that consistently deliver healthy, pleasant, distinctive, connected, sustainable and adaptable qualities.***

Regeneration of derelict property sustains communities and improves neighbourhoods - this is embodied in the application:

Local Development Plans:

LDPs should be place-based and created in line with the Place Principle.

The spatial strategy should be underpinned by the six qualities of successful places. LDPs should provide clear expectations for design, quality and place taking account of the local context, characteristics and connectivity of the area.

They should also identify where more detailed design guidance is expected, for example, by way of design frameworks, briefs, masterplans and design codes.

Planning authorities should use the Place Standard tool in the preparation of LDPs and design guidance to engage with communities and other stakeholders. They should also where relevant promote its use in early design discussions on planning applications

Policy 14

- a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.***
b) Development proposals will be supported where they are consistent with the six qualities of successful places:

We embody within the design, interesting interpretation of local style, vernacular reference that literally and creatively as the NPF4 embodies, reinforcing identity and place

Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.

Pleasant: Supporting attractive natural and built spaces.

Connected: Supporting well connected networks that make moving around easy and reduce car dependency

Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.

Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.

Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

Moray Planning should by this very policy be supporting the application:

Further details on delivering the six qualities of successful places are set out in Annex D.

c) Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

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*Quality homes
Policy Principles*

Policy Intent:

To encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.

Policy Outcomes:

• Good quality homes are at the heart of great places and contribute to strengthening the health and wellbeing of communities.

Absolutely key to this application is the policy here, Moray Planners should be supporting the application with these overriding principles that all directly apply to the design and support the application:

Page 63

- g) Householder development proposals will be supported where they:***
- i. do not have a detrimental impact on the character or environmental quality of the home and the surrounding area in terms of size, design and materials; and***
 - ii. do not have a detrimental effect on the neighbouring properties in terms of physical impact, overshadowing or overlooking.***
- h) Householder development proposals that provide adaptations in response to risks from a changing climate, or relating to people with health conditions that lead to particular accommodation needs will be supported.***

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Policy 17

- ii. reuses brownfield land where a return to a natural state has not or will not happen without intervention;***
- iii. reuses a redundant or unused building;***
- iv. is an appropriate use of a historic environment asset or is appropriate enabling development to secure the future of historic environment assets***

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National Performance Framework

Our Purpose, Values and National Outcomes

We respect, protect and fulfil human rights and live free from discrimination

We have a globally competitive, entrepreneurial, inclusive and sustainable economy

We are open, connected and make a positive contribution internationally

We are creative and our vibrant and diverse cultures are expressed and enjoyed widely

We value, enjoy, protect and enhance our environment

We are healthy and active

OUR PURPOSE

To focus on creating a more successful country with opportunities for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth

OUR VALUES

We are a society which treats all our people with kindness, dignity and compassion, respects the rule of law, and acts in an open and transparent way

We tackle poverty by sharing opportunities, wealth and power more equally

We live in communities that are inclusive, empowered, resilient and safe

We grow up loved, safe and respected so that we realise our full potential

We have thriving and innovative businesses, with quality jobs and fair work for everyone

We are well educated, skilled and able to contribute to society

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NPF4 is required by law to contribute to 6 outcomes:

- Meeting the housing needs of people living in Scotland including, in particular, the housing **needs for older people and disabled people**,*
- Improving the health and wellbeing of people living in Scotland,*
- Increasing the population of rural areas of Scotland,*
- Improving equality and eliminating discrimination,*
- Meeting any targets relating to the reduction of emissions of greenhouse gases, and*
- Securing positive effects for biodiversity.*

The reuse and regeneration of an empty property is directly supported in NPF4:

Page 126

To deliver liveable places, Regional Spatial Strategies and Local Development Plans in this area should maintain and help to grow the population by taking a positive approach to rural development that strengthens networks of communities.

Page 129

A new focus on local living could help to address the high levels of car ownership and respond to the area's dispersed settlement pattern.

The area's towns contribute to its sense of place and further town centre regeneration will help communities to adapt to current challenges and future change. Service provision also needs to reflect the area's character. Several new or extended primary and secondary schools and community facilities are planned and the area will support wider rural communities by hosting a new centre of excellence for rural and remote medicine and social care. Access to good quality open space and opportunities for local food growing, including allotments and community orchards, can benefit health and wellbeing and tackle inequalities as an integral part of placemaking.

The area benefits from a productive coastline that will be a focus for future economic activity and investment associated with offshore renewable energy and the blue economy. The coast is home to communities who will benefit from continued regeneration and a move towards 20 minute neighbourhoods that reduces the need to travel.

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Annex D – Six Qualities of Successful Places

National Planning Framework 4

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1. Healthy: Supporting the prioritisation of women's safety and improving physical and mental health

Designing for:

- lifelong wellbeing through ensuring spaces, routes and buildings feel safe and welcoming e.g. through passive surveillance and use of physical safety measures.*
- healthy and active lifestyles, through the creation of walkable neighbourhoods, food growing opportunities and access to nature and green space*

- accessibility and inclusion for everyone regardless of gender, sexual orientation, age, ability and culture
- social connectivity and creating a sense of belonging and identity within the community
- environmentally positive places with improved air quality, reactivating derelict and brownfield land, removing known hazards and good use of green and blue infrastructure

2. Pleasant: Supporting attractive natural and built spaces

Designing for:

- positive social interactions including quality of public realm, civic spaces, streets and ensuring a lively and inclusive experience
- protection from the elements to create attractive and welcoming surroundings, including provision for shade and shelter, mitigating against noise, air, light pollution and undesirable features, as well as ensuring climate resilience, including flood prevention and mitigation against rising sea levels
- connecting with nature including natural landscape, existing landforms and features, biodiversity and eco-systems, integrating blue and green infrastructure and visual connection
- variety and quality of play and recreation spaces for people of all ages and abilities
- enjoyment, enabling people to feel at ease, spend more time outdoors and take inspiration from their surroundings

3. Connected: Supporting well connected networks that make moving around easy and reduce car dependency

Designing for:

- active travel by encouraging more walking, wheeling and cycling together with reliable, accessible, public transport and shared transport hubs that allow for simple modal shifts
- connectivity including strategic cycle routes, local cycle routes, footpaths, pavements, active travel networks, desire lines, destinations, permeability, accessibility and catering for different needs and abilities
- convenient connections including local and regional interconnection, infrastructure, sustainable travel, interchange between public transport and active travel and supporting easy modal shifts in transport
- pedestrian experience including safe crossing, pedestrian priority, reduced vehicular speed and noise, inclusive design and surfaces, assistive technology, reduced street clutter, catering for suitable vehicular parking and management of loading/unloading and deliveries and refuse collections

Part 3 – Annexes

Place Standard Tool and the delivery of successful places

The Place Standard contains 14 themes that support the Six Qualities of Successful Places, providing a consistent framework to consider and to assess the quality of new and existing places. The Place Standard tool Design Version is specifically created to support the consideration of development planning and design within the framework of the 14 Place Standard themes and to deliver on the Six Qualities of Successful Places.

Part 3 – Annexes

We offer an application which embodies the requirements of NPF4 with our interpretation of the local style and form, shown in the Supporting Document 003 DAS:

National Planning Framework 4

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4. Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted into designs to reinforce identity

Designing for:

- **scale including density, building heights, massing, orientation, building lines and legibility**
- **built form including mix of typologies, types, uses, sizes and tenures**
- **sense of place including design influences, architectural styles, choice of materials and finishes, detailing, landscape design, active frontages and cultural context**

5. Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience and integrating nature positive biodiversity solutions

Designing for:

- **transition to net-zero including energy/carbon efficient solutions, retrofitting, reuse and repurposing and sharing of existing infrastructure and resources**

- **climate resilience and nature recovery including incorporating blue and green infrastructure, integrating nature positive biodiversity solutions**

- **active local economy including opportunities for local jobs and training, work spaces, enabling working from home, supporting community enterprise and third sector**

- **community and local living including access to local services and facilities, education, community growing and healthy food options, play and recreation and digital connectivity**

6. Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can meet the changing needs and accommodate different uses over time

Designing for:

- **quality and function, ensuring fitness for purpose, design for high quality and durability**
- **longevity and resilience including recognising the role of user centred design to cater for changing needs over time and to respond to social, economic and environmental priorities**

- **long-term maintenance including effective engagement, clarity of rights and responsibilities, community ownership/stewardship, continuous upkeep and improvements**

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20 minute neighbourhoods

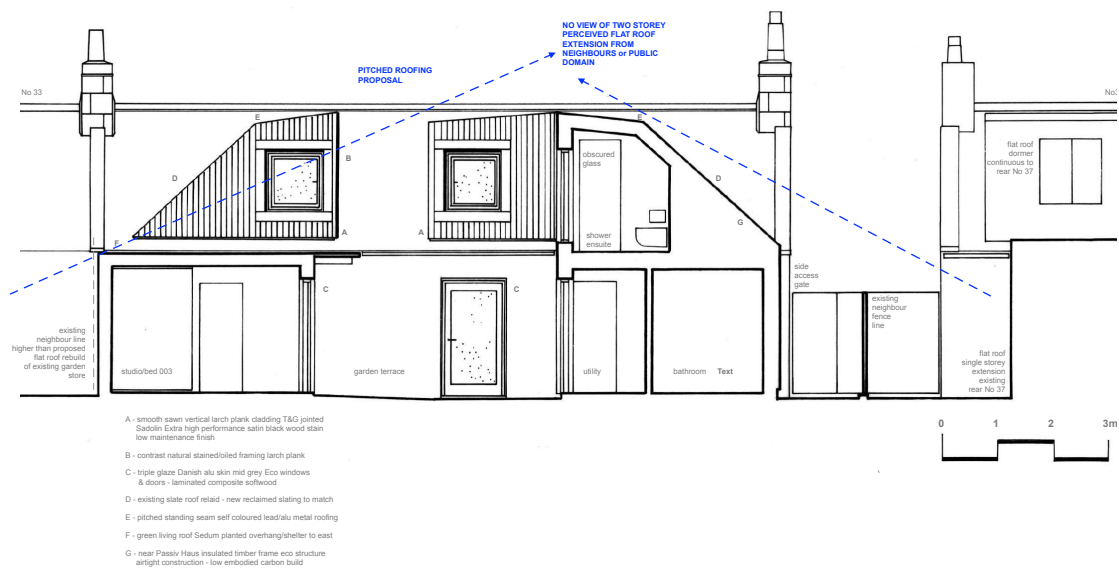
A flexible approach to assessing our places against the concept of local living. A method of achieving connected and often compact neighbourhoods designed in such a way that people can meet the majority of their daily needs within a reasonable distance of their home preferably by sustainable and active travel methods. The principle can be adjusted to include varying geographical scales from cities and urban environments, to rural and island communities. Housing would be planned together with local infrastructure including schools, community centres, local shops and health and social care to significantly reduce the need to use unsustainable methods of travel, to prioritise quality of life, help tackle inequalities, increase levels of health and wellbeing and respond to the climate emergency.

With all NMD proposals we create a quality of design and place, we exceed environmental regulation, we work with and beyond the social requirements of Planning Policy as demonstrated here.

The NPF4 directly supports this application, we attempted to collaborate with Moray Planning, they have tried to personally without policy support to dislike the ‘irregular look’ of the proposal and chose to ignore all other mitigating attributes of the proposal that embody:

- Inclusiveness
- Environmental protection
- Renovation & renewal
- Regeneration of communities

The applicant within their submission acknowledges and champions so much of the intent of NPF4.



NPF4 closes with:

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Placemaking

Placemaking is the process of creating good quality places that promotes people's health, happiness and wellbeing.

It concerns the environment in which we live; the people that inhabit these spaces; and the quality of life that comes from the interaction of people and their surroundings.

Placemaking is a collaborative approach involving the design and development of places over time, with people and communities central to the process.

The applicant thanks the Moray Review Panel for their time and attention with this review request.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Nick Midgley', with a stylized flourish at the end.

Nick Midgley BA Hons Dip Arch Oxford

NMD

cc applicant Ms Claire Lambert