

Lissa Rowan

From: Dominic Batty
Sent: 24 March 2023 13:52
To: Lissa Rowan
Cc: Beverly Smith; Committee Services
Subject: FW: 22/01423/APP - 10 Linksfield Road Mosstodloch

Good afternoon,

In light of NPF4, the newly implemented policies must be considered in regards to the proposed change of use at 10 Linksfield Road, Mosstodloch. In particular, the policies relevant to this application are: 3. Biodiversity; 14. Design, quality and place; and 20. Blue and green infrastructure.

Policy 3 requires proposals for local developments to conserve, restore, and enhance biodiversity. It is noted that there is a high level of vegetation on the site which would provide biodiversity benefits to the area and the proposed change of use would, as noted within the Appellant's Supporting Statement to the Moray Council Local Review Body, 'clear areas to the rear of [the homeowner's] property' resulting in a loss of biodiversity, deviating from the requirements of NPF4 Policy 3 Biodiversity. This policy further supports the protection of ENV designations within the local development plan.

Policy 14 requires proposals to be consistent with the six qualities of successful places. This policy explicitly states that proposals that are detrimental to the amenity of the surrounding area or are inconsistent with the six qualities of successful places will not be supported under NPF4. These qualities are further detailed in Annex D. Quality 1 Healthy requires proposals to be designed for healthy and active lifestyles, part of which is provided by access to nature and greenspace. Quality 2 Pleasant requires proposals to be designed for connecting with nature including natural landscape, biodiversity and eco-systems, and integrating green infrastructure. Quality 5 Sustainable requires proposals to be designed for climate resilience and nature recovery including incorporating green infrastructure and integrating nature positive biodiversity solutions. This application seeks to remove the public access to nature and greenspace and green infrastructure, which also acts as amenity ground, and would lead to a loss of vegetation that provides and enhances biodiversity and eco-systems, deviating from the requirements of NPF4 Policy 14 Design, quality and place.

Policy 20 states that development proposals that result in fragmentation or net loss of existing green infrastructure will only be supported where it can be demonstrated that the proposal would not result in or exacerbate a deficit in green infrastructure provision. The area of open space under this ENV6 designation has already seen a net loss following the permitting of similar developments prior to the adoption of the Moray Local Development Plan 2020 which reinforced the open space designation through the Mosstodloch Settlement Statement and this application would result in the exacerbation of the deficit that the latest iteration of the local development plan aims to prevent through this ENV6 designation. As such, the proposal would deviate from the requirements of NPF4 Policy 20 Blue and green infrastructure.

Relevance should also be given to Policy 15 Local living and 20 minute neighbourhoods which requires the provision of local access to green spaces and high quality walking networks. The site is adjacent to a Core Path and the proposal would degrade the quality of its setting as well as the provision of green space, deviating from the requirements of this policy. Having (and preserving) naturalised green spaces next to housing also enhances local living.

Further relevance should be given to the NPF4 Spatial Strategy and Local Living Spatial Principle which support easy access to greenspace.

Kind regards,

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