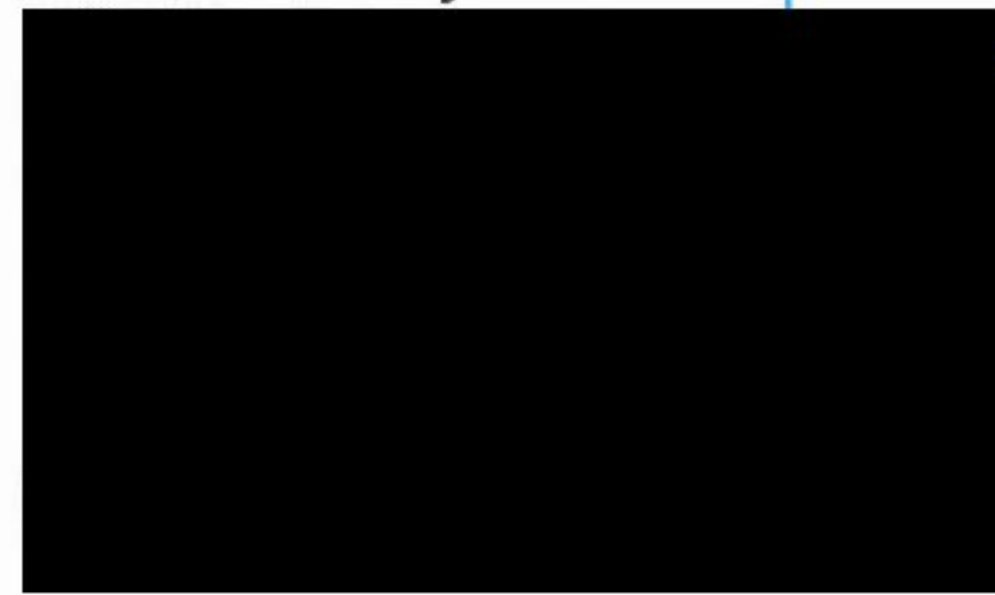


RECEIVED

07 MAR 2019

David N Bailey



6 March 2019

Local Development Plan Team
Development Services
Moray Council
Council Offices
High Street
Elgin
IV30 9BX

Dear Sirs

Moray Local Development Plan 2020
Site Reference Elgin OPP5
OPP5 Auction Mart, Linkwood Road

I refer to the Neighbour Notification dated 7 January 2019 in respect of the above proposals and would like to make the following comments in respect of the latest proposals

There have been a number of unsuccessful attempts to redevelop this site over the years.

I have concerns with regard to the impact of more traffic being generated on the Linkwood Road as a result of developing the site. When you also take into account the new development by Springfield at Linkwood, and any future development at the site of the former Fleming sawmill, there will be significantly more traffic. In my view, serious consideration needs to be given towards providing a proper pedestrian crossing at the roundabout at the end of Linkwood Road. It is all very well talking about Developer contributions, but in my opinion, the transport infrastructure needs to be already in place prior to any potential future development at this site.

The adequacy of the drainage (both surface water and foul water) have been well documented in the past as have the issues regarding flooding and the impact it has had on surrounding properties.

Whilst the new flood alleviation measures will certainly help flood water to get away, the measures do not address the fact that the site of the mart is low lying, with a high water table. This means that when we do get heavy rain, the water in the ground rises and the surface water drains cannot cope with the sheer volume of water and hence the site and the surrounding areas become flooded, in particular, the bottom end of Linkwood Road, New Elgin Road and Market Drive. The problems would be further exacerbated by the surface water and sewerage which would be generated from any proposed housing.

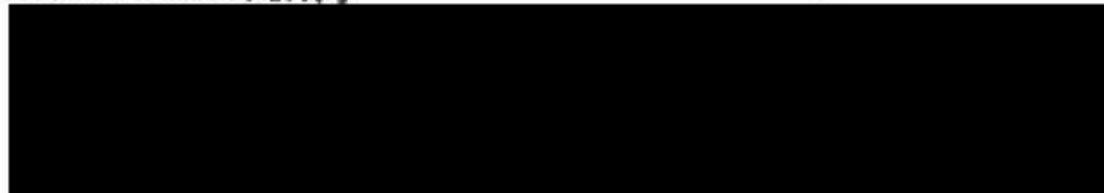
To date, no developer has come up with a satisfactory proposal to alleviate the flooding issues to the satisfaction of the Planning Authority, Building Control and other parties involved in assessing and advising the council in respect of these issues.

Other issues previously discussed have included the potential impact on schools, nursery facilities, health centres, dental surgeries if any additional housing was proposed in any future planning application.

In addition, the HSE raised concerns over housing being close to the Gleaner Depot, there was a risk of harm to people.

I also note that if any housing was proposed in any future application, then a connection to Market Drive would be proposed. I am quite sure that this would be unacceptable to the residents of Market Drive.

Yours faithfully

A black rectangular box redacting the signature of David N Bailey.

David N Bailey

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002031
Date: 22 February 2019 08:42:46

Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

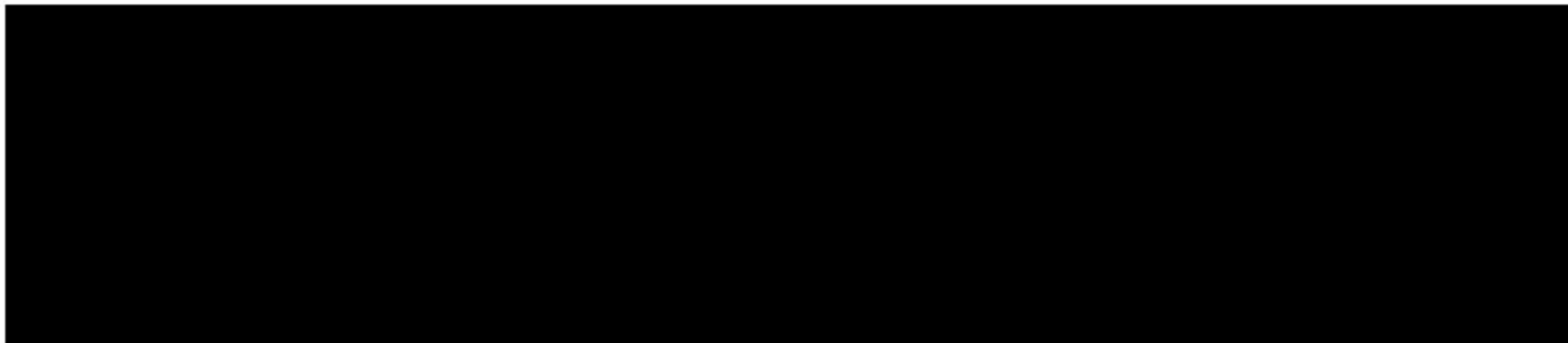
Your Details

Title: **Mrs**

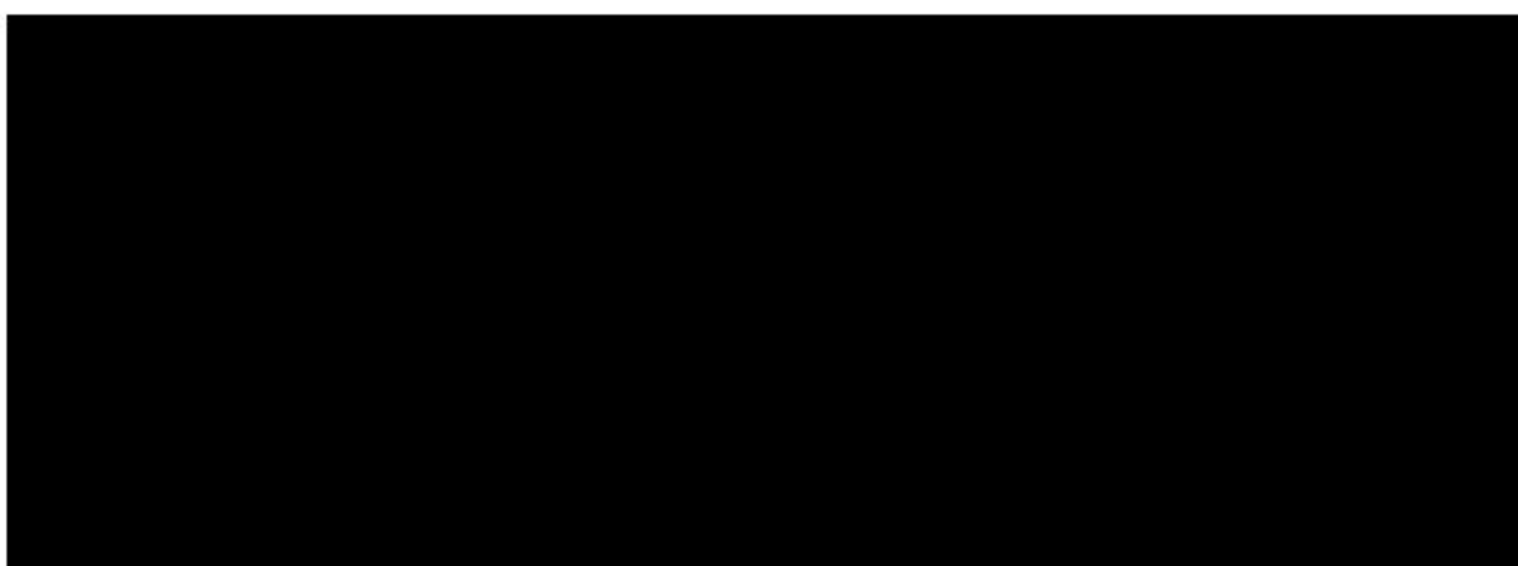
Forename(s): **Gillian**

Surname: **Bain**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin Central**

Site reference: **OPP 11**

Site name: **Walled Garden**

Comments: **I object to this development as the Horticulture dept. run their classes at the Biblical gardens next to Elgin Cathedral from school pupils through to HNC courses and have successfully maintained and developed the gardens in a real life working environment in partnership with the Friends of the Biblical Garden. This proposed development would stop all of this amazing work and remove this facility.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: KN_R3 - 002089
Date: 26 February 2019 09:36:52

Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

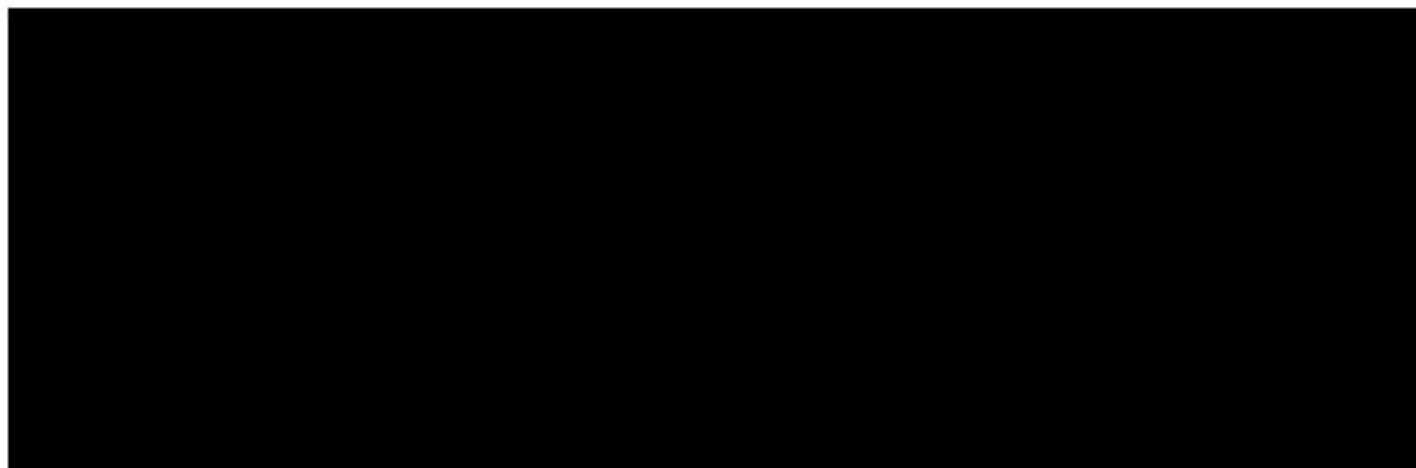
Your Details

Title: **Mr**

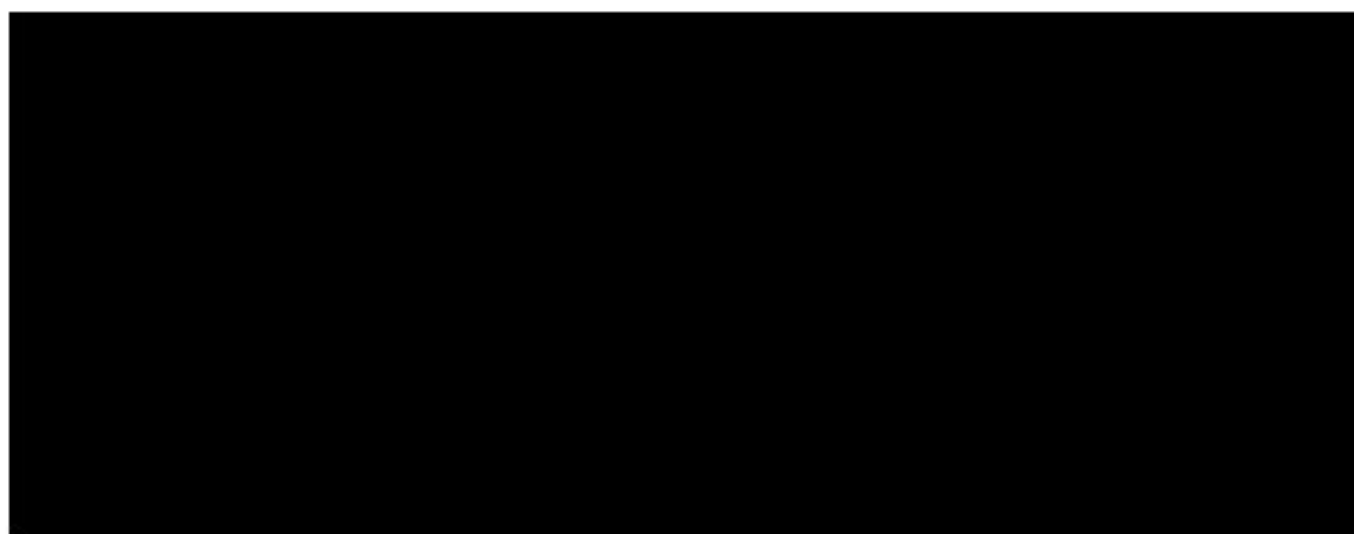
Forename(s): **Peter**

Surname: **Bales**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details information.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **Yes**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Kinloss**

Site reference: **Kinloss R3**

Site name: **R3 Damhead**

Comments: **The proposals for this site make no mention of the rights of way in existence for well over 20 years, indeed at least 40 years to my knowledge in the case of the main path through the site. These paths are marked clearly on your map and are in daily use. Recognition of this fact should therefore be noted in the planning criteria and, I believe, form part of any future development.**

Policy Objection

Policy:

Comments:

Please use [this link](#) to view and retrieve the uploaded attachments.



Ref: CR/CT

15th March 2019

Moray Council
Development Services (Development Plans)
High Street
Elgin
Moray
IV30 1BX



Dear Sirs,

**Moray Local Development Plan - Proposed Plan 2019
Representation on behalf of Barratt North Scotland**

Barratt North Scotland (Barratt) provided responses to Homes for Scotland (HfS) in preparation of their representation to this consultation and agree with the points raised in their representation, which is appended to this submission. The points raised below are in addition to those raised by HfS.

SPATIAL STRATEGY (pages 8-11)

Barratt supports the Council's Growth Strategy, which identifies Elgin as the *primary growth centre*, with secondary growth areas identified in Forres, Buckie, Aberlour and Fochabers; with a focus on delivering existing designated sites which are either in the development process or have stalled in tertiary areas. This enables the promotion of sustainable growth in areas of high demand, whilst enabling organic growth of smaller settlements.

STRATEGIC CONTEXT – HOUSING LAND REQUIREMENT (pages 13-14)

Housing Land Requirement

In line with Homes for Scotland (HfS), Barratt supports the addition of a 30% generosity onto the baseline HNDA figure calculate its housing land requirement. This allows allocation of development sites in order to ensure consistent delivery of

supply throughout the area, reflecting varied market conditions and changing circumstances.

Additional Housing Requirement

We agree with HfS that the 2018 Moray Housing Land Audit (HLA) should have been used as a basis for assessing the effective housing land supply and programmed completions for the new LDP, rather than the 2017 HLA, which informed the Main Issues Report (MIR). The evidence base for any additional housing requirement should be updated between MIR and Proposed Plan stages to use the 2018 HLA as the most up to date evidence base available, which is the be most appropriate and accurate as a reflection of the land supply.

Requested Amendment: In line with HfS, we request that Table 1 on page 13 of the Proposed Plan is amended to reflect the 2018 audit position.

It is unclear whether the “sites effective 5yr+” includes any homes programmed for delivery beyond the plan period, which would not be relevant for the calculation of the additional housing land requirement for the plan period. Clarity is required on this to ensure that the additional housing land requirement reflects the plan period to 2035.

Requested Amendment: Clarity is provided on the programming of homes for the ‘sites effective 5yr+’ column of Table 1.

Requested Amendment: Clarity is provided on how 2017 programmed completions are dealt with in the methodology to calculate the additional housing land requirement given that the plan period begins the following year, 2018.

POLICY: PP1 PLACEMAKING (pages 22-31)

b) Placemaking Statement

The requirement under b) that 3D visuals form part of a *Placemaking Statement* is unduly onerous and should be deleted. The provision of this level of information should be considered on an individual basis and not form a blanket requirement.

Requested Amendment: The requirement for 3D visuals should be removed from PP1 criteria b).

(i) Character and Identity

Barratt seek clarity on the wording of this policy to ensure that the intention of the policy that the number of character areas within a development is identified throughout the design evolution process, at key junctions and along principle streets for example and that the policy is not overly prescriptive in its requirements. HfS consider that a patchwork of different character areas would not positively add to the design or placemaking aspirations of a new development.

(vi) Parking

Barratt strongly object to policy PP1 (vi) Parking. The requirement that a 'minimum of 75% of car parking requirement must be provided to the side or rear and behind the building line, with a maximum of 25% car parking within the front curtilage or on street' on all streets is an inefficient use of land and will render development unviable in many cases, and limit the range of houses that can be provided. Whilst this is caveated 'subject to the visual impact being mitigated by hedging, low stone boundary walls or other acceptable treatments that enhance the streetscape' this is subjective. We request that the reference to a minimum standard is removed.

We request that the requirement to 'provide semi-mature trees and planting within communal private and public/visitor parking areas and on-street parking at a maximum interval of 4 car parking spaces' is removed. It is unduly onerous to stipulate the method and frequency used to visually soften large areas of car parking. Developments requires to be visually attractive in order to market and sell properties, but this frequency and reliance on semi-mature trees is unfounded and has significant financial consequences, particularly in future-proofing the root-systems of the trees and may be at odds with the roads authority standards. We suggest that the second bullet point is removed in its entirety and the text included in the fourth bullet point that 'Parking areas must use a variation in materials to reduce the visual impact on the streetscene' sufficiently addresses this aspect.

These requirements reduce flexibility in design at Development Management stage, particularly where a rigid interpretation of the policy wording could be taken, rather than a more pragmatic and proportionate approach. We agree with HfS that this should be a matter of placemaking and should be taken on a case by case basis rather than exerting a rigid percentage.

Requested Amendment: (vi) Parking [Bullet point 1]

Remove the following sentence:

On all streets a minimum of 75% of car parking must be provided to the side or rear and behind the building line with a maximum of 25% car parking within the

front curtilage or on street, subject to the visual impact being mitigated by hedging, low stone boundary walls or other acceptable treatments that enhance the streetscape;

and replace it with

Developers should consider providing car parking to the side or rear and behind the building line within a development, and mitigation of the visual impact of car parking through hedging, low stone boundary walls or other acceptable treatments that enhance the streetscape.

Requested Amendment: (vi) Parking [Bullet point 2] – remove sentence in its entirety.

POLICY: PP3 INFRASTRUCTURE & SERVICES (pages 32-34)

a) iv) Electric Car Charging Points/ Care Sharing

Our response to policy DP1 provides justification for the removal of the requirement to provide electric car charging points within communal parking facilities and car share parking spaces within residential developments.

Requested Amendment: PP3 a) iv) remove requirement to provide electric car charging points and care share spaces within communal parking facilities for residential developments.

a) viii) Information Communication Technology

The requirement to provide 'Information Communication Technology (ICT) and fibre optic broadband connections for all premises' should be deleted. These connections are provided by the service provider, rather than the developer. In many cases the infrastructure could be unavailable and would unfairly prejudice planning applications on a matter which is not within the control of the applicant.

Requested Amendment: PP3 a) viii) remove requirement in its entirety.

b) i) New Accesses onto Key Routes

Clarification is required to ensure that this policy applies to development proposals outwith settlement boundaries. For example, the approved Findrassie Masterplan provides new access onto the A941.

POLICY: DP1 DEVELOPMENT PRINCIPLES (pages 35-37)

(ii) Transportation

- (ii) b) The second sentence 'Minimal (25%) parking to the front of buildings and on street may be permitted provided that the visual impact of the parked cars is mitigated by hedging or low stone boundary walls' should be removed from this paragraph. Barratt made strong objection to policy PP1 b) vi) *parking* in respect the minimum requirements for the location of car parking and this sentiment is repeated here. Car parking can be accommodated within a street scene in a manner that does not dominate the area, through the use of hard and soft landscaping and through the use of character areas. However certain standards for private and visitor car parking require to be met, placing an onerous blanket restriction on the location of car parking to the side and rear of properties is an inefficient use of a development site and can render a development unviable. Also additional roads incur additional cost and maintenance for the roads authority or residents. Restricting parking to the front of buildings to a maximum of 25% is a dangerous and ill-thought out policy which will have severe negative impacts on the viability of development. The impact of cars on the street scene should be considered through placemaking and be considered on a case by case basis.
- (ii) f) Barratt agree with HfS that this paragraph requires clarity as-to whether the Council is stating that turning points will be preferred to hammerheads. We request that clarity is provided on this, and adequate justification provided. Policy PP1 Placemaking (vii) street layout and detail bullet 4 refers to cul-de-sacs in certain circumstances of no more than 10 units. If a hammerhead is not permitted for this style of street layout, there may be an impact on the density and plot size that can be achieved, which may then have an impact on the overall design of the site.
- (ii) i) Electric Car Charging Points/ Car Sharing
Barratt object to the inclusion of 'a requirement for electric car charging points' within communal parking areas and that 'parking spaces for car sharing must be provided where a need is identified by the Transportation Manager'.

Electric Car Charging Points: provision of charging points within individual curtilages and within integral garages ensures that if used, the electricity is paid for by the householder. This is not feasible for communal car parking areas. Similarly, taking a connection from a property to a car parking space

introduces a trip hazard within the public realm for several hours at a time – which is unacceptable. Providing for electricity within a factoring agreement, which would cover the management and maintenance of a facility will disproportionately impact householders that do not utilise an electric car or do so infrequently. Whilst the Council's objective to future proof the sustainability of new development is understood, the provision of electric car charging points within communal areas of residential development is unviable.

Car Sharing: The scheme for car sharing in Moray is community-owned and in its infancy and does not cover all settlements. The requirement to provide spaces for a scheme to meet an unknown demand, with an uncertain supplier should not be enshrined in policy.

Requested Amendment: DP1 (ii) i) remove requirement to provide electric car charging points and car share spaces within communal parking facilities for residential developments.

Seemingly small policy decisions such as this can have a larger implication on site for the home builder if the justification and reasoning is not robust and impacts understood by the Council. Barratt expect all aspects of this policy to be in line with Designing Streets.

POLICY: DP2 HOUSING (pages 38-41)

e) Housing Mix and Tenure Integration

Whilst a mix of tenure on a site is desirable, it is not always possible. The requirement should be changed from must provide to should provide.

Requested Amendment: DP2 e) 'tenures' should be deleted from the description of requirements, the proposal should read:
Proposals for 4 or more housing units must provide a mix of house types sizes to meet local needs as identified in the Housing Need and Demand Assessment and Local Housing Strategy.

f) Accessible Housing

Barratt strongly object to the proposed Accessible Housing policy requirement that all 'housing proposals of 10 or more units will be required to provide 10% of the private sector units to wheelchair accessible standard, with all of the accessible units to be in single storey form'.

The justification for this policy is that there is an ageing population in Moray and that 'there is a direct positive correlation between ageing and wheelchair use', this policy 'is intended to provide disabled persons with increased tenure choice'. However under the *Building Standards Technical Handbook 2017: Domestic Buildings* all new homes are built to wheelchair accessible standard, therefore this is addressed through separate means and is not a requirement for a planning policy.

The stipulation that 10% of all private units are to be single-storey is unduly onerous and has no justification or basis in policy. The Council justify that forcing housebuilders to provide 10% of their development as bungalows, without any consideration of the marketability of such product or assessment of the financial implications of this decision, in addition to affordable obligations is 'intended to provide disabled persons with increased tenure choice'. However this policy does not guarantee that the initial or subsequent purchaser has accessibility needs or would not seek to make alterations to increase floorspace in the future. This can only be guaranteed in perpetuity through delivery as social-rented accommodation. There is no direct requirement for a disabled person to purchase a bungalow, this clumsily assumes that there are no able-bodied residents in the household, who would utilise upper floor rooms.

Whilst Scottish Planning policy does refer to "supporting delivery of accessible housing", it does not specifically refer to single-storey bungalow development, therefore we strongly object to the restriction of accessible housing units to bungalows.

This constrains the home builder and does not allow for other potential solutions or options to come forward to adequately meet the accessible housing need. To help in managing the growing population, the provision of existing housing stock could be adapted as accessible housing with options such as converting garages and internal alterations to existing homes, or the provision of ground floor flats could be implemented, rather than seeking bungalows as the only form of acceptable accessible housing provision.

At a time where development finance is still an issue for many home builders, limiting house types to bungalows for a proportion of the site has an effect on land value, and therefore potentially the viability of a site. Bungalows require a larger plot size and are therefore more costly in terms of land value to develop, and that increase in cost tends not to be recouped through the sale of land, as bungalows tend not to cost much more to the buyer than other house types. In addition, with bungalows requiring more land, the overall development numbers on each site may be reduced, with a resulting knock-on effect in the number of affordable and accessible units if

fewer homes are being delivered on the site. This would result in the overall reduction in homes that can be delivered on the site by the homebuilder, adding to the deliverability issues that Moray currently faces.

Very little evidence is provided by Moray Council to support the introduction of this LDP policy. Indeed, it appears that the evidence base is the same as that used in 2016 at the time of the introduction of an accessibility housing requirement (which was less onerous than this new requirement) through Supplementary Guidance. At that time, Homes for Scotland queried the evidence base used by the council as it relied on the type of property that people on the Council waiting list would prefer. No evidence was given as to whether these individuals would be the customer of these private accessible homes for sale provided by the home builder, and whether these people were in a position to buy one of these properties. We acknowledge that the HNDA demonstrates an ageing population in Moray, but do not believe that this in itself is evidence to support the private sector delivery of accessible homes in the area. If there is an identified affordable need for accessible homes, these should be delivered through affordable housing, but Homes for Scotland members note that if there was an overwhelming market for bungalows in Moray, the industry would already be responding to that by providing bungalows. This is not currently the case.

Requested Amendment: DP2 f) the requirement for 'with all of the accessible units to be in single storey form' should be deleted.

POLICY: DEL 1 DELIVERY OF EFFECTIVE SITES AND DELIVERY PROGRAMME (page 104)

This proposed policy requires 'landowners, agents and developers of sites designated for development in the LDP (to) produce an annual Delivery Strategy/ update and bi-annual reports on completions/ progress, which will be used to inform the LDP Delivery Programme and future infrastructure requirements'.

Following discussions with the Council on their expectations for the format of these reports, it is understood that the Council intend to issue a proforma for completion and return. This is welcomed, rather than an undefined requirement and we request that this is made explicit within the policy. In line with HfS, Barratt request that this procedure does not become onerous or overly procedural, and that any procedure or proforma produced by the Council is shared with HfS and the developers of sites designated for development in the LDP for comment prior to implementation.

Requested Amendment: DEL1 the policy should provide for the Council to issue proforma requests for the required reports.

APPENDIX 2: PARKING STANDARDS (pages 110-123)

Electric Vehicle Charging Points

Barratt made representations to policies PP3 a) iv) and DP1 (ii) i), stipulating that for residential developments the provision of electric vehicle charging within communal parking areas is unfeasible, certainly at the rate of 1 per 10 spaces required through appendix 2.

Requested Amendment: **APPENDIX 2:** Electric Vehicle Charging Points should specifically exclude 'residential' from the requirement to provide charging points within communal car parking areas.

Parking

Barratt agree with HfS in respect of concerns about the increase in car parking standards as set out in pages 121 -123 of the Proposed Plan:

- We note that the parking standard (page 111) for in-curtilage residential parking design has changed since the last plan, and now requires on-plot car parking spaces to be a minimum of 3m wide by 5.5m in length, with a minimum of 6m in length where located in front of an up-and-over type garage door. This variation is considered to be too large of a change and we query the justification for such a change. We would support car parking design in line with the current Moray Council Parking Standards.
- We do not support the change in the number of car parking spaces required and query the justification for this, particularly for 2-bed flats which have increased to 2 spaces for both private and affordable flats. We support a car parking requirement in line with current Moray Council Parking Standards.

Garage Sizes

In addition to the above Barratt strongly object to the note 'that Single garages with internal clear dimensions of less than 7 metres by 3 metres will not be counted towards the parking provision'. This requirement should be reduced to at least 6 metres by 3 metres. Similarly proposals for double garage sizes should be reduced from 'minimum clear internal dimensions of 6.0 metres width by 6.5 metres' to 6 metres by 6 metres, 'to be counted as 2 spaces.

Requested Amendment: **APPENDIX 2:** the notes on page 123 for single and double garage sizes should be amended to read



Single garages with internal clear dimensions of less than 6.0 metres by 3.0 metres will not be counted towards the parking provision.

Double garages must have minimum clear internal dimensions of 6.0 metres width by 6.0 metres length to be counted as 2 spaces.

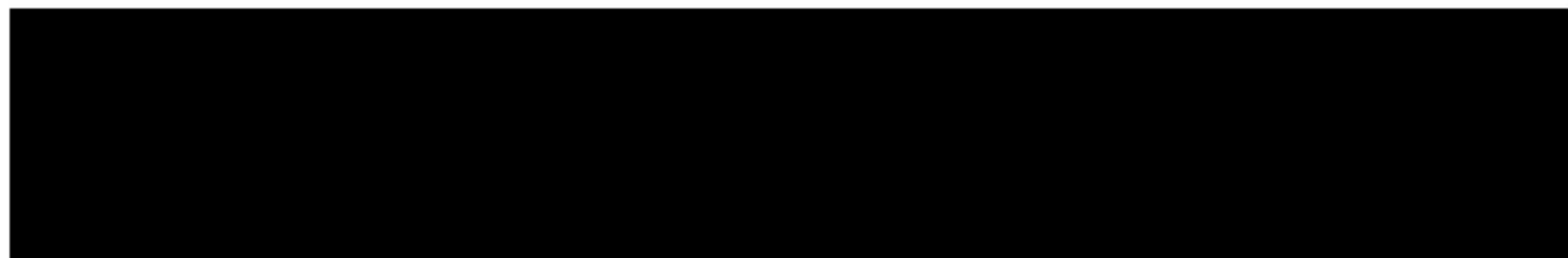
This will have significant impact on the design of housetypes and proposals for future development. We request that this is amended to align with current Moray Council Parking Standards.

Should you require clarification or additional justification for any of the points raised below please do not hesitate to contact us.

Yours sincerely
for BARRATT NORTH SCOTLAND



Catherine Thornhill BLE (Hons) MRTPI
Land Buyer



Enc. *Response to Moray Council Local Development Plan Proposed Plan, Homes for Scotland (March 2019)*

improving living in scotland



**RESPONSE TO MORAY COUNCIL LOCAL DEVELOPMENT PLAN
PROPOSED PLAN**

March 2019

ABOUT HOMES FOR SCOTLAND

Homes for Scotland is **the** voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

Visit www.homesforscotland.com for further information and follow us on twitter @H_F_S

PROCESS

Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

This response has been discussed and agreed by the Homes for Scotland Highland & Moray Home Builders' Committee.

Volume: 1

Heading: Strategic Context – housing

Page Number: 13-14

Site / Policy Reference: Table 1 – Housing Land Requirement to 2035

Housing Land Requirement

Homes for Scotland supports the Council's chosen 30% generosity margin added to the housing supply target to reach its housing land requirement.

Terminology

Homes for Scotland considers the terminology within the Proposed Plan (particularly in the orange box on page 14) to be confusing. We have assumed that the "annual housing completion target" is the Housing Supply Target as defined in Scottish Planning Policy (on an annualised basis), and that the "annual average housing land supply target" is the Housing Land Requirement from SPP (again on an annualised basis). Homes for Scotland considers that the terminology could be amended to be more consistent with SPP to avoid any misunderstanding.

Additional Housing Requirement

SPP paragraph 120 states that plans should "*allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement in full. They should provide a minimum of 5 years effective housing land supply at all times*". To do this, the authority must first understand how many homes it is projecting to deliver (using housing land audit data) from existing planning permissions and existing LDP sites, to allow them to calculate how many additional homes are required for this new LDP.

The Proposed Plan uses the 2017 Moray Housing Land Audit (HLA) as a basis for assessing the effective housing land supply and programmed completions for the new LDP. This was used in the Main Issues Report (MIR); however, Homes for Scotland suggests that the evidence base for any additional housing requirement should have been updated between MIR and Proposed Plan stages to use the 2018 HLA as the most up to date evidence base available. At examination, the Reporter might also have the 2019 HLA available to them and may wish to look at this Audit as the most up to date housing land position, however for now the 2018 HLA is the most up to date position available.

As the most up to date position on housing delivery, the 2018 audit is considered to be most appropriate and more accurate as a reflection of the land supply. HFS requests that Table 1 on page 13 of the Proposed Plan is amended to reflect the 2018 audit position.

Assuming that there are no other necessary amendments to this table as a result of other queries raised below, this would amend the 'existing effective supply D' to 3,638 units, and the 'sites effective 5yr+' to 1,320 units which would, in turn, amend the 'additional housing land requirement to 2,046 homes.

Homes for Scotland notes that this is an increase of 345 homes from the Proposed Plan's additional housing land requirement and believes this to be more representative of the actual position based on the most recent audit evidence base, allowing the housing land requirement to be met over the plan period.

Further, in relation to the use of the 2017 audit in the Proposed Plan, Homes for Scotland queries how the year 17/18 has been addressed in the calculations in Table 1. The programmed completions within the 2017 audit include 2017/18, as does the existing effective supply presumably, but this year is not relevant for the LDP which starts at 2018.

It is unclear whether the “sites effective 5yr+” includes any homes programmed for delivery beyond the plan period, which would not be relevant for the calculation of the additional housing land requirement for the plan period. Clarity is required on this to ensure that the additional housing land requirement reflects the plan period to 2035.

Homes for Scotland requests the following:

- The evidence base is updated by the Council to use the 2018 Housing Land Audit and table 1 on page 13 updated accordingly.
- Clarity is provided on the programming of homes for the 'sites effective 5yr+' column of Table 1.
- Clarity is provided on how 2017 programmed completions are dealt with in the methodology to calculate the additional housing land requirement given that the plan period begins the following year, 2018.

Volume: 1

Heading: Primary Policies

Page Number: 22-31

Site / Policy Reference: Policy PP1 Placemaking

(i) Character & Identity:

Homes for Scotland notes that bullet 2 could be misinterpreted and suggests that further clarity is added. This requirement could be read to mean that for every 20 units, a different character area is required, when the intention of the policy really seems to be that for sites of 20 units and above, more than one different character area will be required. It is also considered that this threshold of 20 units is artificially low and could be amended to be increased to 50 units, in line with a major development which would be appropriate for larger sites, or perhaps on a scale of thresholds to ensure that the level is right for different sizes of sites. A patchwork of different character areas would not positively add to the design or placemaking aspirations of a new development which might happen with the threshold at 20, and the industry understands and accepts the need to differentiate between character areas. This policy could be reworded to be more flexible whilst also being proportionate.

(vi) Parking:

In Policy PP1 part vi on parking, Homes for Scotland considers the requirement for 75% of car parking requirement to the side or rear of the property to be overly onerous. It reduces the flexibility in design at Development Management stage where an officer may stick rigidly to the wording of the policy, rather than taking a more pragmatic and proportionate approach. Homes for Scotland considers this should be a matter of placemaking and should be taken on a case by case basis rather than exerting a rigid percentage, therefore suggests that the wording of this policy is amended to be more flexible. Further, we consider that elements such as the addition of boundary treatments to soften the appearance of driveways is an inefficient use of space and could be dealt with on a more flexible case by case basis.

General:

Homes for Scotland notes that this is a very lengthy policy with a lot of different parts to it, which would ordinarily be included as Supplementary Guidance. We recognise that the Council is pre-empting the potential removal of statutory Supplementary Guidance through the planning review, however we consider that this policy is too long and overly prescriptive for an LDP policy. As with other policies in the Proposed Plan, Homes for Scotland suggests that some of the detail of this policy is removed and inserted into a 'guidance' section of the

plan, rather than all being included in the policy itself. This would allow the policy to be more concise and deliberate, leaving more flexible and detailed aspects to guidance.

The requirements for a Placemaking Statement (paragraph b) seem overly onerous on the applicant, particularly given that the threshold for this would be 10 units, for example in the expectation that 3D visuals will be produced and submitted to support the development. We request that the threshold is increased for this kind of statement, or that the requirements are made more flexible.

Homes for Scotland considers that the Placemaking policies and guidance should refer back to Designing Streets to ensure continuity between the national and local level of policy and guidance.

Volume: 1

Heading: Primary Policies

Page Number: 32-34

Site / Policy Reference: Policy PP3 – Infrastructure & Services

Homes for Scotland is concerned about the impact that this policy could have on all home builders, in particular small-scale home builders as it appears to be overly onerous for home builders.

We would like to see policies within LDPs to support this sector to build again, recognising the important role that small scale home builders play in delivering homes across Scotland, and that this role could be significantly increased with plans in place which are proportionate and support small scale home builders to come back into the market, or new entrants to the market.

We understand this policy is more for larger scale developments but have concerns that the long list of requirements will discourage smaller scale home builders from investing and delivering homes in Moray. Whilst we would hope that a pragmatic view on the number of reports and other requirements is taken at development management stage in the determination of an application, there is concern that having this level of detail specifically within the text of the policy will reduce proportionality, pragmatism and negotiation at the later application stage where a case officer may not feel able to deviate in any way from the specifics of the policy.

Volume: 1

Heading: Development Policies

Page Number: 35-37

Site / Policy Reference: Policy DP1

(ii) Transportation

Under section (f), Homes for Scotland queries the Council's comments. It is not clear from the text of this section of the policy whether the Council is stating that turning points will be preferred to hammerheads. We request that clarity is provided on this, and adequate justification provided. Policy PP1 Placemaking (vii) street layout and detail bullet 4 refers to cul-de-sacs in certain circumstances of no more than 10 units. If a hammerhead is not permitted for this style of street layout, there may be an impact on the density and plot size that can be achieved, which may then have an impact on the overall design of the site.

Seemingly small policy decisions such as this can have a larger implication on site for the home builder if the justification and reasoning is not robust and understood.

Homes for Scotland would expect all aspects of this policy to be in line with Designing Streets and would suggest that any duplication could be removed to streamline the policy, reducing its length somewhat.

Volume: 1

Heading: Development Policies

Page Number: 38-41

Site / Policy Reference: Policy DP2 - Housing

Affordable Housing

Homes for Scotland is supportive of a maximum 25% affordable housing requirement for housing developments, in line with Scottish Planning Policy.

Homes for Scotland is concerned that the affordable housing policy (DP2 part d) together with the accompanying guidance is overly onerous for smaller sites, therefore negatively affecting small scale home builders.

Given the deliverability issues in Moray, it is essential that small scale home builders are encouraged to continue in the area, and for new companies to come into Moray to add to the mix of sites that are deliverable. Small scale home builders will be active on smaller sites that would not be marketable for larger home builders, allowing these larger companies to concentrate on the delivery of the more marketable sites in key locations, with smaller scale home builders taking on smaller sites, often in more rural locations where need for new homes of all tenures is greatest. The LDP should be seen as a package of policies, allocated sites, targets and guidance which will support the delivery of new homes across Moray. Consideration must be given to the cumulative impact that the plan's policies will have on smaller scale businesses, as well as larger home builders.

The requirement for 25% of the total units on a site to be provided as affordable housing for developments of 4 or more units is one of the most restrictive policies in Scotland. Furthermore, the requirement for developments of less than 4 market housing units to contribute a commuted payment may result in small scale home builders withdrawing from Moray as a potential development area, given the extra costs to develop there, thus exacerbating the deliverability issue in areas of greatest need where larger builders will not be developing. The Plan does not set out a level of commuted sum that will be required, although officers have indicated this would be at a level of £4,000 per home. Together with other developer obligations, and upfront costs to obtain planning permission, this additional sum will be an additional risk to smaller scale home builders who will be unlikely to have this cost covered by funding mechanisms.

Homes for Scotland considers that the guidance section of the Plan in relation to affordable housing section of this policy could be more flexible. Whilst the guidance does not explicitly restrict sites for 100% affordable housing development, it is not very supportive of this type of proposal. Homes for Scotland is supportive of the creation of mixed communities but considers that given the affordable need highlighted by the Council within the HNDA, and the market in Moray, any proposal for affordable housing which is acceptable in design terms, should be viewed favourably. Private sector development makes an important contribution to the delivery of affordable housing through the 25% affordable policy requirement, and any

proposal over and above this 25% threshold (up to 100%) should be encouraged, rather than dissuaded through the LDP policy and guidance.

Accessible Housing

Homes for Scotland does not support the proposed Accessible Housing policy in DP2 Housing, part f, nor does it support the guidance text or reasoning behind the introduction of this as a policy requirement in the LDP. We object to the principle of this policy, as well as the detail of the policy itself. This policy is overly onerous and is not supported by compelling evidence to justify its inclusion in the LDP.

Each home, whether it is a bungalow under this accessible housing policy, or any other home, will be sold to a buyer who may or may not have accessibility needs. As a home owner (and subject to planning consent etc) that buyer will then be entitled to adapt their property as they wish – for example adding another storey or an extension which would then mean the property is no longer an accessible bungalow. Further, that buyer would then sell on the property to another buyer who may or may not have an accessible need. Therefore, there is no way, through the development of private homes for sale, that homes built under this accessible housing policies can be guaranteed to be sold to someone who has an accessible need, nor is there any way of guaranteeing that these homes will remain accessible.

Conversely, if a need for accessible housing can be evidenced in a robust way, this could be met through the delivery of affordable housing which can then be allocated specifically to someone or a family with accessibility needs, and the home can remain as an accessible property in perpetuity as an RSL or the Council will be in control of the occupancy and any alterations to the property.

Whilst Scottish Planning policy does refer to “supporting delivery of accessible housing”, it does not specifically refer to single-storey bungalow development, therefore we question the restriction of accessible housing units to bungalows. This constrains the home builder and does not allow for other potential solutions or options to come forward to adequately meet the accessible housing need. To help in managing the growing population, the provision of existing housing stock could be adapted as accessible housing with options such as converting garages and internal alterations to existing homes, or the provision of ground floor flats could be implemented, rather than seeking bungalows as the only form of acceptable accessible housing provision.

At a time where development finance is still an issue for many home builders, limiting house types to bungalows for a proportion of the site has an effect on land value, and therefore potentially the viability of a site. Bungalows require a larger plot size and are therefore more costly in terms of land value to develop, and that increase in cost tends not to be recouped through the sale of land, as bungalows tend not to cost much more to the buyer than other house types. In addition, with bungalows requiring more land, the overall development numbers on each site may be reduced, with a resulting knock-on effect in the number of affordable and accessible units if fewer homes are being delivered on the site. This would result in the overall reduction in homes that can be delivered on the site by the homebuilder, adding to the deliverability issues that Moray currently faces.

Very little evidence is provided by Moray Council to support the introduction of this LDP policy. Indeed, it appears that the evidence base is the same as that used in 2016 at the time of the introduction of an accessibility housing requirement (which was less onerous than

this new requirement) through Supplementary Guidance. At that time, Homes for Scotland queried the evidence base used by the council as it relied on the type of property that people on the Council waiting list would prefer. No evidence was given as to whether these individuals would be the customer of these private accessible homes for sale provided by the home builder, and whether these people were in a position to buy one of these properties. We acknowledge that the HNDA demonstrates an ageing population in Moray, but do not believe that this in itself is evidence to support the private sector delivery of accessible homes in the area. If there is an identified affordable need for accessible homes, these should be delivered through affordable housing, but Homes for Scotland members note that if there was an overwhelming market for bungalows in Moray, the industry would already be responding to that by providing bungalows. This is not currently the case.

Volume: 1

Heading: Development Policies

Page Number: 43

Site / Policy Reference: Policy DP3 – Long Term Land Reserves

Homes for Scotland supports the inclusion of LONG allocations in the LDP showing the direction of future housing growth for the authority and providing additional housing land that could come forward in the event of a shortfall in effective housing land supply.

Volume: 1

Heading: Development Policies

Page Number: 44-52

Site / Policy Reference: Policy DP4 – Rural Housing

Homes for Scotland notes that this policy is more restrictive than in the current LDP and has concerns over the negative impact this will have on the delivery of smaller scale development opportunities in more rural areas which still have a housing need which could be met by small scale home builders.

Homes for Scotland would like to see supportive policies in the LDP to encourage more small scale home builders to take up development opportunities in Moray, and we are concerned that Policy DP4 will not achieve this.

This policy is long and overly onerous, and much of the detail could be removed allowing the policy text itself to be slimmed down, and the remainder of necessary detail added as guidance (as has been done with some other policies, for example DP2 Housing).

Homes for Scotland understands the policy rationale in tackling cumulative build up of individual homes in rural areas, but considers that more could be added to this policy to encourage development of small scale sites which are appropriate, to meet a defined need in these rural areas as identified in the HNDA, adding to the housing mix and supporting the larger scale development by other home builders in the more marketable locations for larger sites.

Volume: 1

Heading: Delivery Policies

Page Number: 104

Site / Policy Reference: Policy DEL 1

In relation to reporting annual progress, we request that this procedure does not become onerous or overly procedural, and that any procedure or proforma produced by the Council is shared with Homes for Scotland for comment prior to implementation.

Volume: 1

Heading: Appendix 2

Page Number: 111-123

Site / Policy Reference: Car Parking Standards

Homes for Scotland raises a number of concerns with the car parking standards as set out in pages 121 -123 of the Proposed Plan:

- We note that the parking standard (page 111) for in-curtilage residential parking design has changed since the last plan, and now requires on-plot car parking spaces to be a minimum of 3m wide by 5.5m in length, with a minimum of 6m in length where located in front of an up-and-over type garage door. Homes for Scotland considers this variation to be too large of a change and queries the justification for such a change. We would support car parking design in line with current practice.
- We note that there is a change in the number of car parking spaces required, which is not supported by Homes for Scotland. We query the increase in the number of spaces to be provided, particularly for 2-bed flats which have increased to 2 spaces for both private and affordable flats. We would support a car parking requirement in line with current Moray practice.
- The requirement for one cycle space per property is overly onerous and could negatively impact the character and design of the development. Homes for Scotland supports the promotion of cycling as an alternative mode of transport but considers that the standards must be more flexible and on a case by case basis.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002076
Date: 24 February 2019 16:51:49

Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

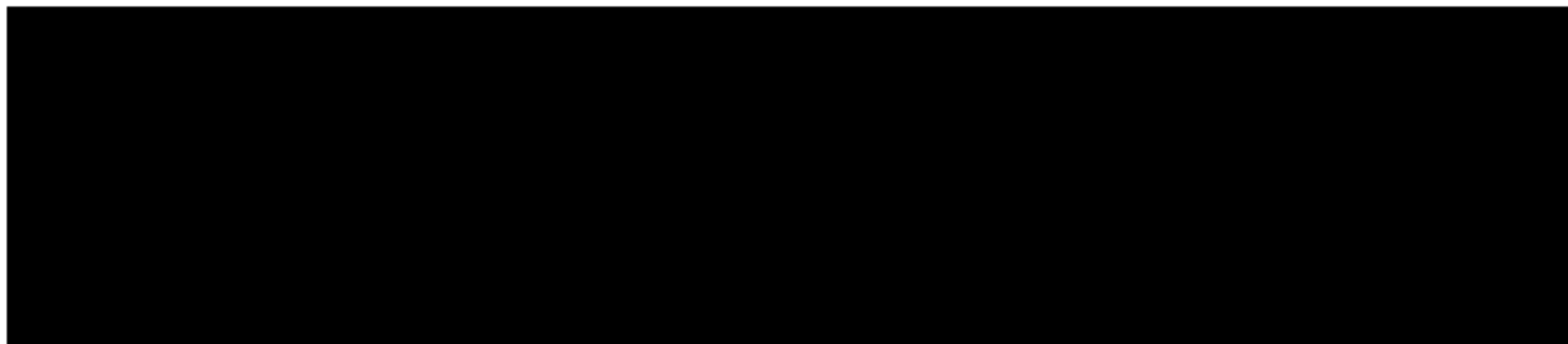
Your Details

Title: **Mrs**

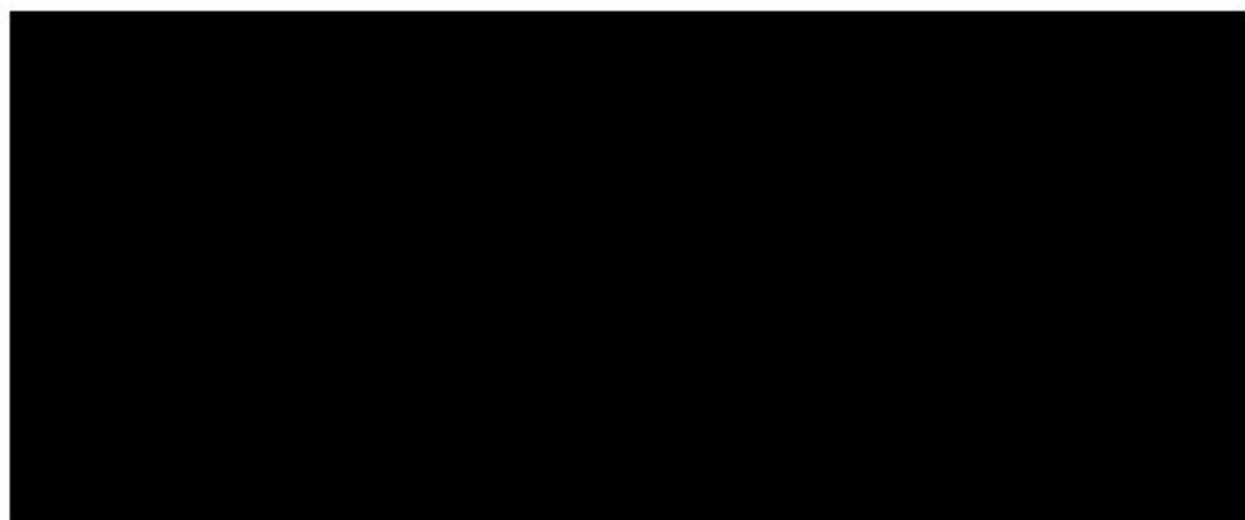
Forename(s): **Lara**

Surname: **Beach**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin Central**

Site reference: **OPP 11**

Site name: **Walled Garden**

Comments: **This is a area that is used by the college and visitors on a regular basis. By taking this away you are affecting the future of students and the town itself.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: [REDACTED]
To: [Localdevelopmentplan](#)
Subject: LT_SITEA - 002212
Date: 15 March 2019 14:24:22
Attachments: [image001.png](#)
[image002.png](#)
[10538493_675368219208200_8054402165969047833_n.jpg](#)
[10610544_675368119208210_2075333699107357154_n.jpg](#)
[lintmill burn.jpg](#)
[10487322_675368005874888_3375276958533384450_n.jpg](#)
[10509674_675368315874857_6955123542716837618_n \(1\).jpg](#)
[10509674_675368315874857_6955123542716837618_n.jpg](#)

Dear Sir or Madam,

I reside at [REDACTED] I received your letter dated 7 January 2019.

The outline for Site A actually meets Cullen Burn. I was unable to find any information in the Strategic Flood Risk Assessment document but I have attached photos from when Lintmill was previously flooded. I do not own the copyright to these photos but believe they show how extensive flooding can be. The flood risk maps for Cullen, which show Lintmill on the periphery do not fully reflect the actual flooding which has previously occurred.

<https://riverlevels.uk/burn-of-deskford-cullen#.XluxSCH7SUK>

States -

"The normal level of the Burn of Deskford at Cullen in average weather conditions is between 0.20m and 0.36m. It has been between these levels for at least 153 days in the past year. The usual range of the Burn of Deskford at Cullen in more extreme weather conditions is between 0.30m and 1.06m. It has been between these levels for 90% of the time since monitoring began. The highest level ever recorded at the Burn of Deskford at Cullen is 1.80m, reached on Monday 11th August 2014 at 7:00am."

I believe that a large proportion of site A acts as a buffer strip when there are raised water levels. There is varied vegetation which supports differing wildlife. Mice, rabbits, birds and bats are regularly seen in or over Site A. The site is also the location for invasive plant species. Digging up the area for building works is likely to disperse rhizomes, potentially to existing homes. The adjacent road to Site A is private and in a poor condition.

The 2008 Local Plan for Lintmill stated -

"Ground conditions are uncertain here and the development may have to connect directly to the exiting public septic tanks (which serve only part of the community) which are understood to be operating near capacity. Infill and gap site opportunities exist elsewhere within the community. Tochineal Farmhouse and associated buildings present an opportunity for sensitive regeneration within its existing setting. A public water supply is available. Amenity land is designated to protect trees and hedging as well as the burn banks which are subject to change and flooding. As parts of Lintmill are at risk of flooding, applications for development may be asked to carry out a detailed flood risk assessment."

Part of the site suggested as suitable now was previously deemed to be amenity land and I am unsure why this has changed.

I believe that there must be other sites in Lintmill which would be much more suitable for housing. Please take these comments into account.

Yours sincerely

Samantha Bennion

Partner

T (01542) 833255

F (01542) 834611

E sbennion@stewartwatson.co.uk

DX 556243

42/44 East Church Street

Buckie

AB56 1AB

sw_logo



www.stewartwatson.co.uk

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From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_R11 - 002115
Date: 04 March 2019 21:34:32

Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

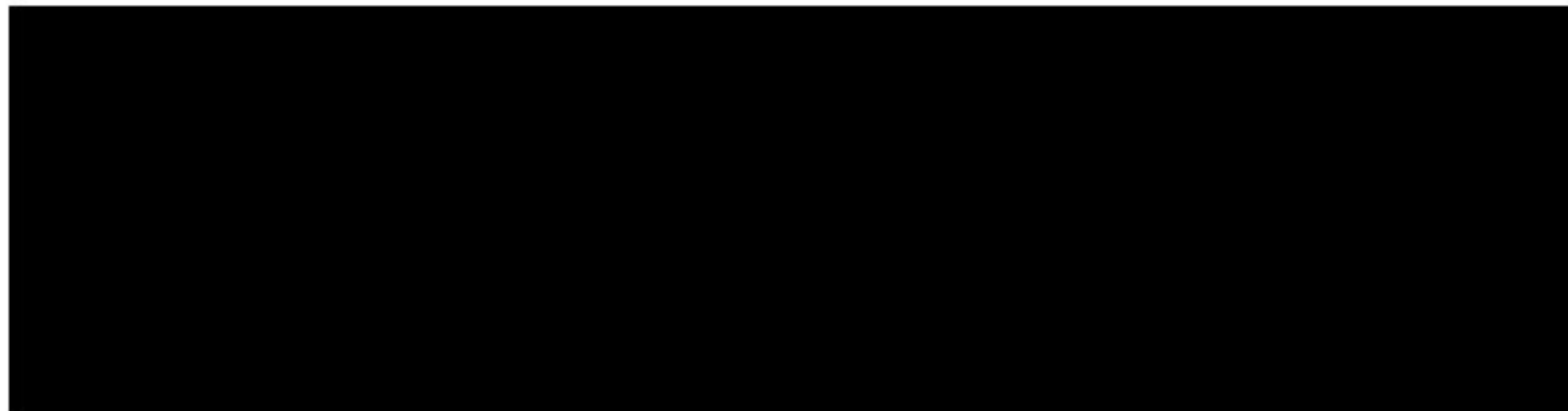
Your Details

Title: **Mrs**

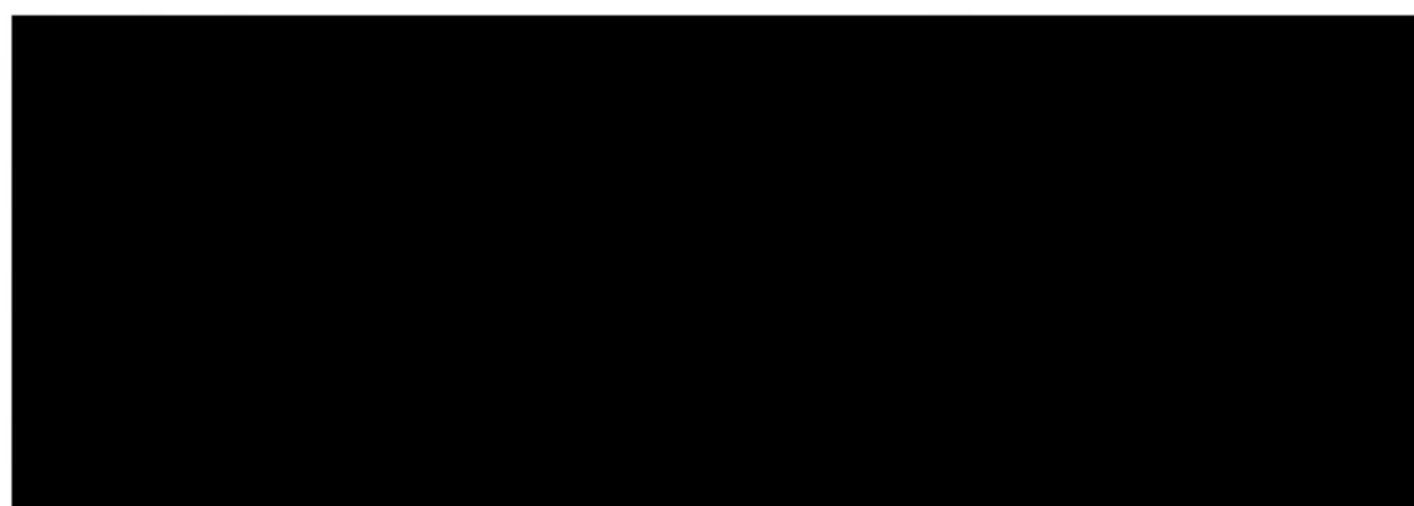
Forename(s): **Jenny**

Surname: **Benson**

Your Address

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Contact Details

A large black rectangular box redacting the contact details information.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin**

Site reference: **R11**

Site name: **Findrassie**

Comments: **What is the need for these houses" The current houses being built are not all sold, there is a massive lack of school space and talk of cuts to schools, the hospital is struggling to accommodate the current population and again threats of cuts and down grading, the leisure centre is struggling with the massive in take of people with fit life cards it now also can?t cope and turning people away and lastly though I could go on, the town is dead it?s lifeless and struggling. Well done on ruining a quiet little town that was doing just find, not to mention all the wild life that lives on the current findrassie site and pond.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: KE_R7- 002153
Date: 12 March 2019 09:30:36

Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

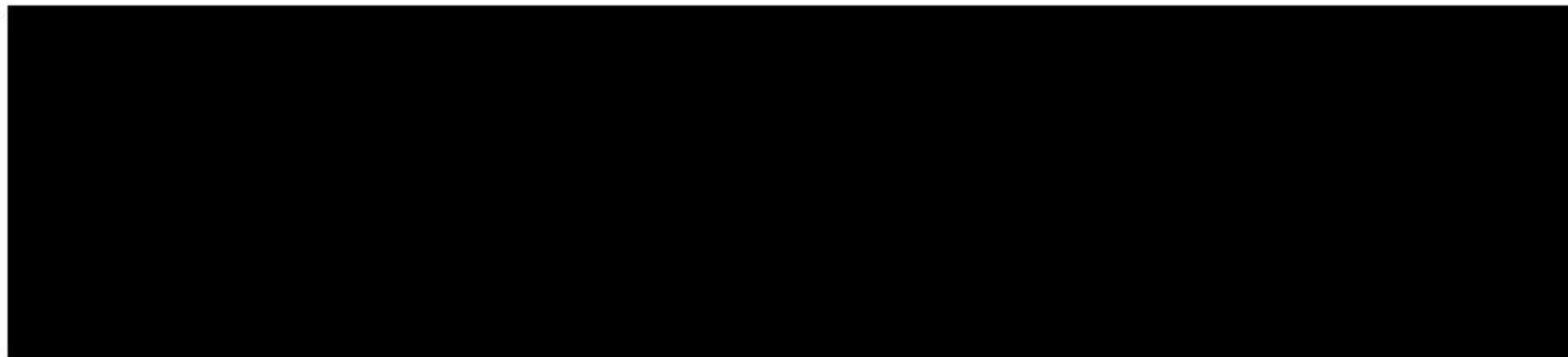
Your Details

Title:

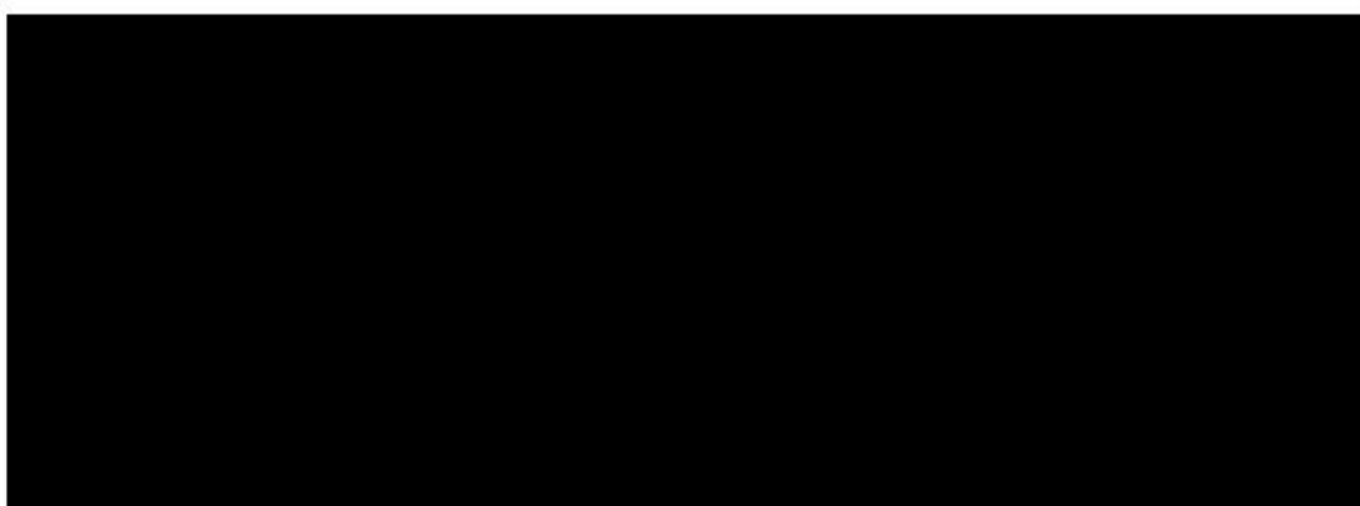
Forename(s): **Jodi**

Surname: **Best**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Keith**

Site reference: **R7**

Site name: **Jessiman's Brae**

Comments: **Road Infrastructure - not adequate or wide enough to accommodate the heavy equipment required for construction on this lot. The lot has a steep slope and to level and stabilise the area for buildings will require heavy equipment (e.g. dump trucks and diggers) to access the site. Our house is at the bottom of Jessiman's Brae and is situated directly on the road. We are also located at a choke point of a blind curve. The road is single track that narrows at the choke point. Directly opposite our house is a stone wall. There is very little room to manoeuvre large/heavy vehicles. We, the owners of [REDACTED] are concerned that our property will be damaged by the said vehicles, and as the house is directly on the road, any contact with the house could have structural implications. Braco St at the top of the Brae is equally narrow with residents parking on the road.**

site_obj_name_town_village_grouping : Keith

site_obj_reference : R7

site_obj_name : Jessiman's Brae

site_obj_comments : **Light - the proposed development will impede light into our property. If buildings are built at top of the site, on Braco St, or at the bottom, on Victoria Place, this will affect the natural light we get into the property and into the house. The natural light naturally increases the temperature into the conservatory and house. Any change will require us to use more heating and will have a financial impact.**

site_obj_name_town_village_grouping : Keith

site_obj_reference : R7

site_obj_name : Jessiman's Brae

site_obj_comments : **Site of archaeological interest - Milton Castle, Old Keith Distillery... As the site is situated in close proximity to the mediaeval Milton Castle the site has a great potential to be a site of archaeological significance. The area is has been the location of a number of mills, tanneries, breweries, and distilleries have been built along the river over the centuries. As the houses in the area we built pre-1900, at a time when archaeology preservation was not of importance, this lot is the last opportunity to capture the history of the area. There is verbal history that the Old Keith distillery was built across the river from Milton Distillery in the 1780s. An in-depth archaeological survey should be conducted before any activity takes place.**

site_obj_name_town_village_grouping : Keith

site_obj_reference : R7

site_obj_name : Jessiman's Brae

site_obj_comments : Historic Area The houses in the area are stone built - the majority are stone-built pre-1900 buildings. The character of the neighbourhood will be severely impacted by any new build.

Please use [this link](#) to view and retrieve the uploaded attachments.

Norman Birch



10/02/2019

Local Development Plan Team
Moray Council Offices
High Street
Elgin
IV30 1BX

Main Issues Report. Site Ref: LDP202_BID_EL21
Land At ENV4 South Lesmurdie

To whom it may concern:

My objections to the proposed redevelopment of the above site.

As I live on the edge of the park it will affect me in many ways, i.e. outlook, traffic, congestion for parking and a feeling of being closed in after 37 years of the same view from my window.

The park has already lost land and been spoiled by a Gas Governor which is sited at the main entrance.

According to SEPA half of the site is protected by the Elgin Flood Alleviation Scheme and as a defended flood plain is not suitable for vulnerable development. There are gas, sewerage, water pipes and valves buried there, all of which have to be accessible.

Woodside Terrace is at present a busy road with traffic and parked cars. To add more traffic would be a danger to children on the street and in the park. Residents already park at the rear of the flats due to lack of parking spaces.

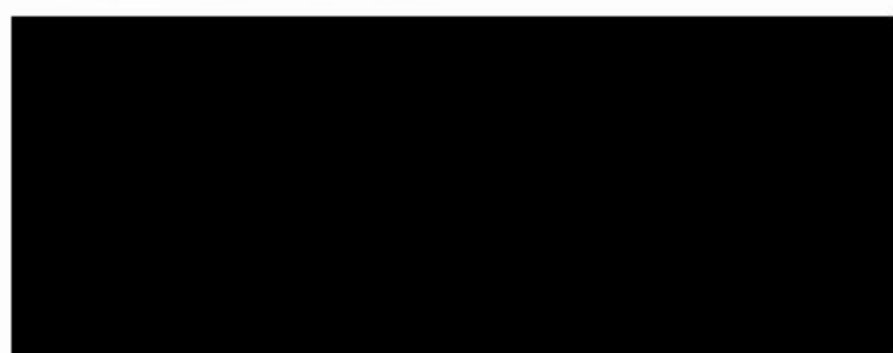
This park is the only recreational ground for the community of South Lesmurdie. It is well used by children, adults and pet owners. To change it in any way or size would be a great loss to all.

The outlook this park gives has been constant for 50 years or more. My own view has been the same for 37 years. To change it would be upsetting to myself, and many residents.

Not everyone in South Lesmurdie is aware of the proposals. But anyone I have spoken to disagrees with building more houses here.

These are my objections, and I trust you will consider them fairly and favourably.

Yours sincerely
Norman Birch



From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: RO_R1 - 002180
Date: 14 March 2019 18:51:14

Moray Local Development Plan - Proposed Plan 2019

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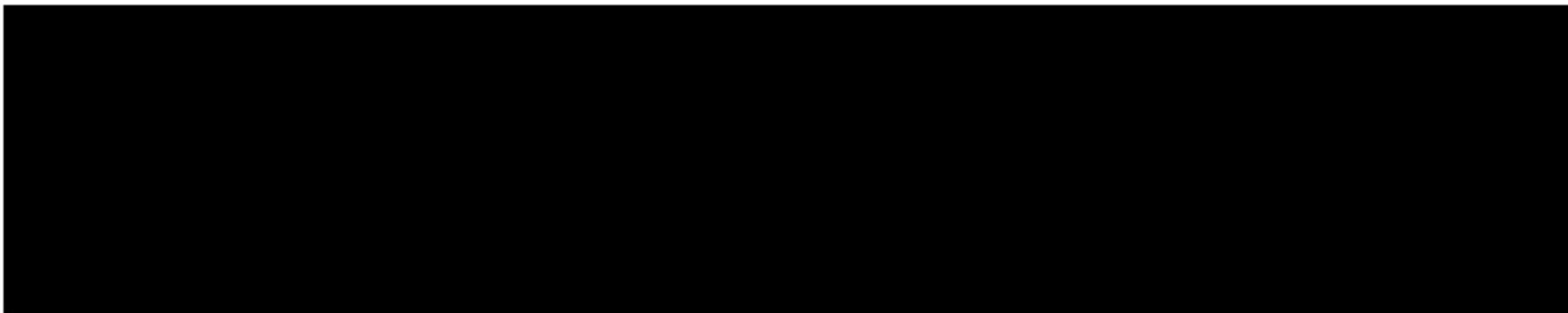
Your Details

Title: **Mrs**

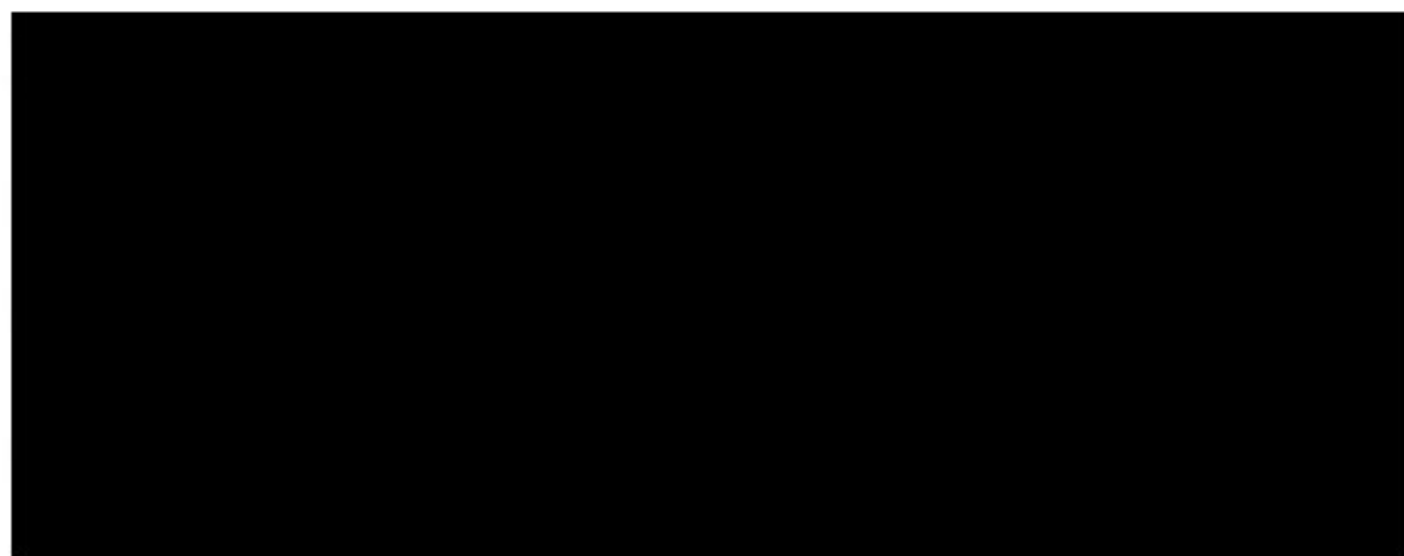
Forename(s): **Nicola**

Surname: **Boardman**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details information.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **Yes**

Other: **Yes**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **ROTHES**

Site reference: **R1**

Site name: **Spey Street**

Comments: **The field proposed for development is a flood plain. SEPA identifies this part of Rothes at medium risk of flooding and the outer boundaries of this proposal at high risk - this is with the flood alleviation work that had been done in Rothes. If houses were built in this field, it would put those houses at risk as well as other houses in the area which have previously been unaffected by the flooding in Rothes. Also, the run off if water would be affected, causing any run off to move into the Spey differently and this could ultimately impact the shape and course of the river. The current flood alleviation work in Rothes was built to withstand 1 in 100 risk of flooding and current expectations are that any flood alleviation work should be built to withstand 1 in 200 risk of flooding. This means that the current flood alleviation infrastructure in Rothes would be rendered useless if additional properties were to be built. The risk comes from the Burn of Rothes and the run off from that passes through the field in question. The field is adjacent to public walking routes, a public amenity which would be significantly impacted were more houses to be built in this area. The silence, solitude and open country feel would be taken from Rothes. This field is home to groups of hares. We see them run and play in the field. We watch the male hares box in the Spey and see the young with their mothers. This habitat would be destroyed, leaving these native Scottish wild animals without a home. This field is farmed and in regular use. There are usually 2 crops per year and the farmer finds it to be quality agricultural land which provides a good yield. As our bedrooms all back on to the field, we have no intrusion of artificial light after dark. It is pitch black out there at night and the proposed development would significantly alter the character of the street. This would cause a deterioration in current living conditions for residents as there would be considerable light and noise in comparison to the present situation.**

Policy Objection

Policy:

Comments:

Other Objection

Document commenting on: **No**

Comments:

Please use [this link](#) to view and retrieve the uploaded attachments.

22 JAN 2019

K. A. & Mrs C Bowie



21st January 2019

Dear Sirs

Sire Reference: Keith – R2

Site Name – R2 Dunnyduff Road

Site Description – Designation of site for 40 Houses

With regards to the above proposed plan we do not consider the area suitable for further development on the grounds that the infrastructure for it has not been fully considered and would be inappropriate in the foreseeable future. The immediate area around the proposed new houses is classed as a 'sump' area prone to high levels of water and potential flooding of nearby properties. Further housing development would only escalate the drainage issues which at the bottom end of Bridge Street which can be observed overflowing on a regular basis during periods of heavy rain. No. 1 and No. 3 have already flooded within the properties twice and extensive water within the grounds of numbers 2, 4 and 6 causing major issues.

At the end/corner of Bridge Street is a building merchant and adjacent to their property is a lorry park. Further up Edindiach Road is a very busy car repair business and all three together with general movement of vehicles to and from the existing housing developments has generated high levels of traffic which could be potentially dangerous and totally inappropriate to what are essentially small and minor side streets. An accident waiting to happen. Speed of these vehicles is also a concerning consideration.

The above is our own personal priorities however there is also some thought to be given for the general success for a developing and expanding small town like Keith i.e. more or larger school/s, public transport, more doctors/health centre/hospital, public toilets and general amenities. Although some of these are being planned for the long term future they have to be in place or in progress before any further housing development implemented.

We therefore object to this proposal on all the above issues.

Yours sincerely



Keith Bowie
Catherine Bowie

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: DB - EL_OPP11- 002050
Date: 22 February 2019 09:39:37

Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

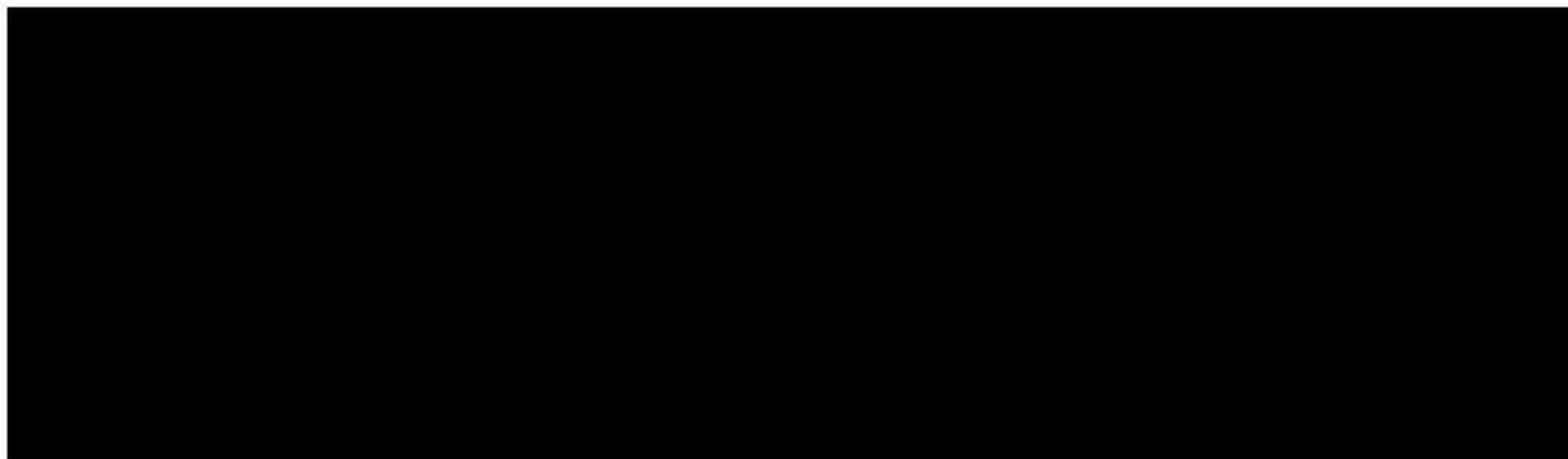
Your Details

Title: **Miss**

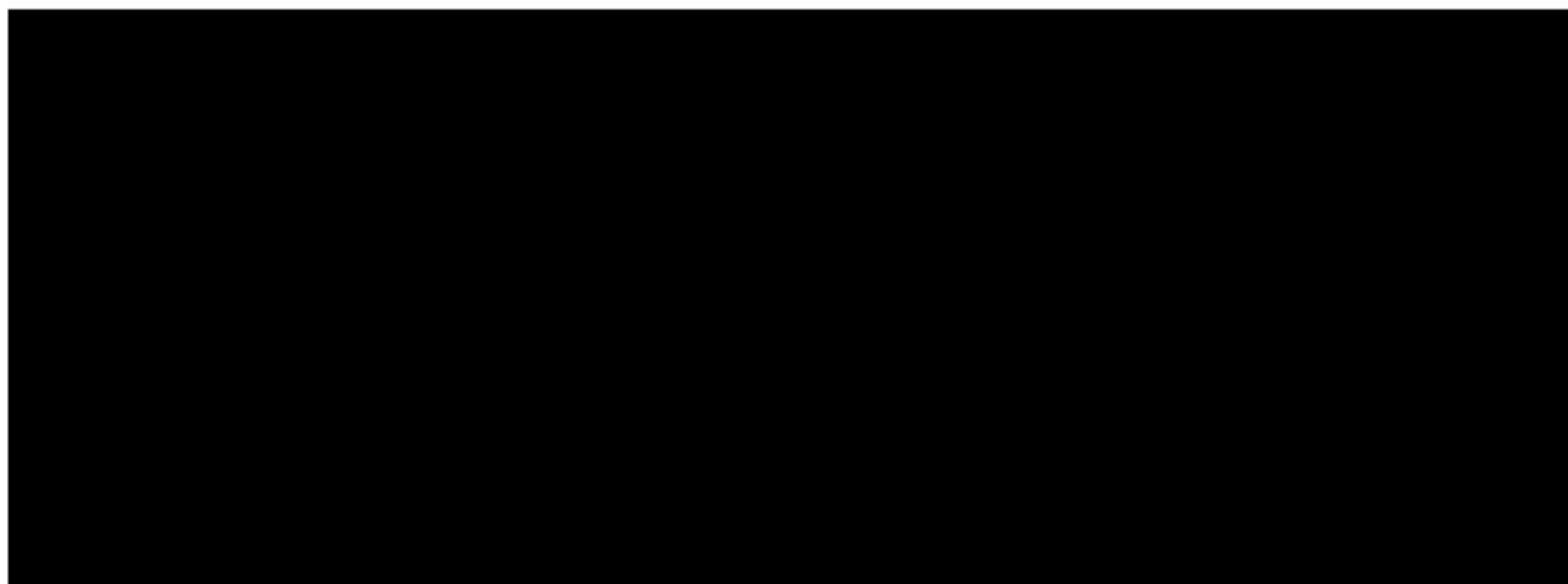
Forename(s): **Elizabeth**

Surname: **Boyall**

Your Address

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Contact Details

A large black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **Yes**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Biblical Gardens**

Site reference: **Cooper Park**

Site name: **Hotel Build Plans**

Comments: **I do not agree with poly tunnel, greenhouses, shed used by Moray College Horticulture Students being 'ripped down!! Please review your 'nonsensical planning. Education is our future and The Biblical Garden are an important part of this. The People of Elgin enjoy the gardens which are partly maintained by Moray College UHI.**

site_obj_name_town_village_grouping : Lossiemouth

site_obj_reference : Cooper Park

site_obj_name : Cooper Park

site_obj_comments : Ascabove

Policy Objection

Policy: **Vision**

Comments:

policies_list :

policy_obj_comments :

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: DA_R3 - 000729
Date: 10 March 2019 11:47:29

Moray Local Development Plan - Proposed Plan 2019

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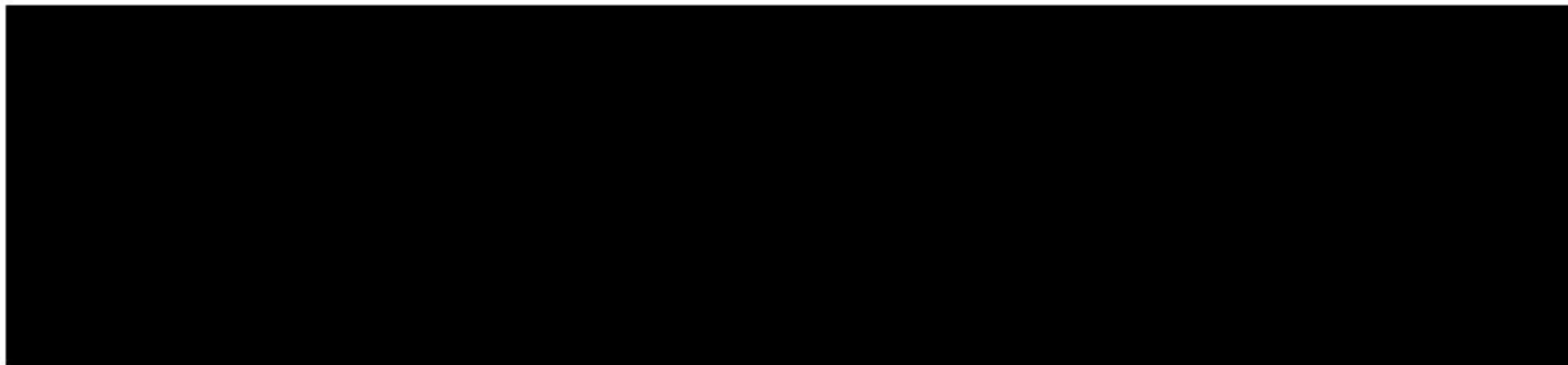
Your Details

Title: **Mr**

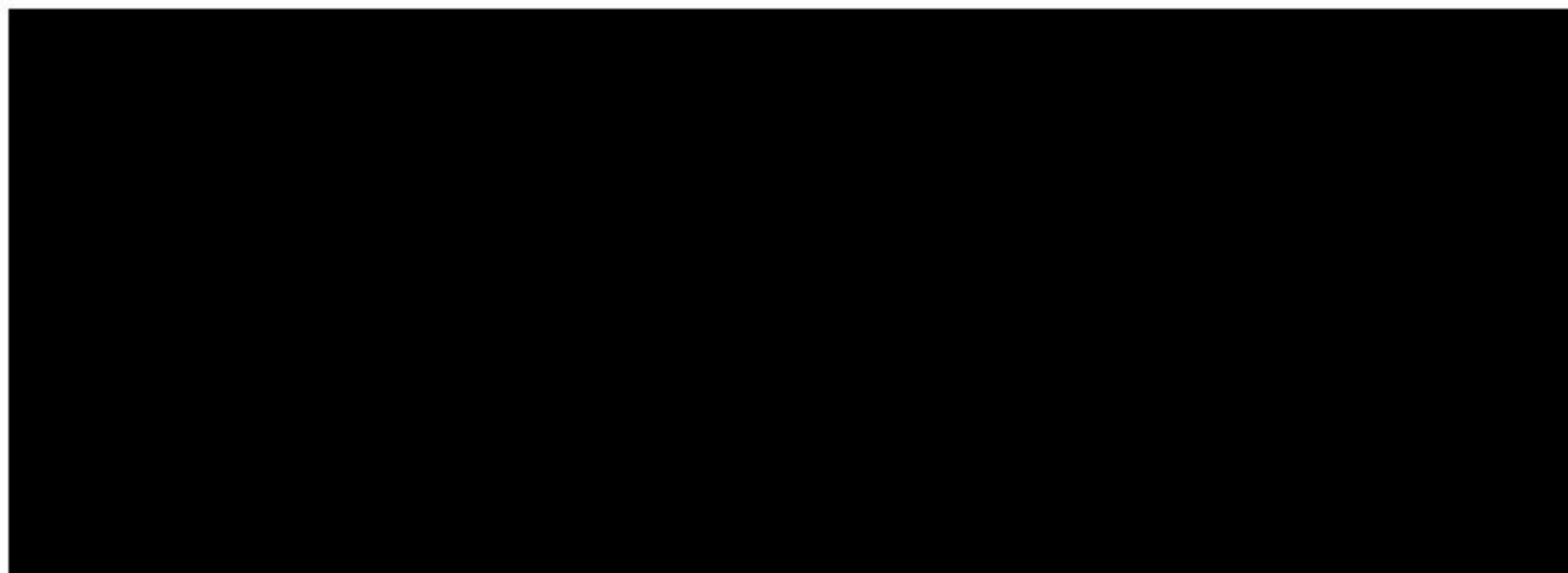
Forename(s): **Anthony**

Surname: **Boyle**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details information.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **Yes**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Dallas**

Site reference: **R3**

Site name: **Former Filling Station**

Comments: **Site is recommended for 4 houses. Originally the plan allowed for 2 houses. No objection to 4 houses but the height of house should be restricted to 1 or 1.5 storeys so that the development reflects the rural character of the village.**

Other Objection

Document commenting on: **Dallas R3 Former Filling Station**

Comments:

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: BK_R6 - 001981
Date: 10 January 2019 11:42:49

Moray Local Development Plan - Proposed Plan 2019

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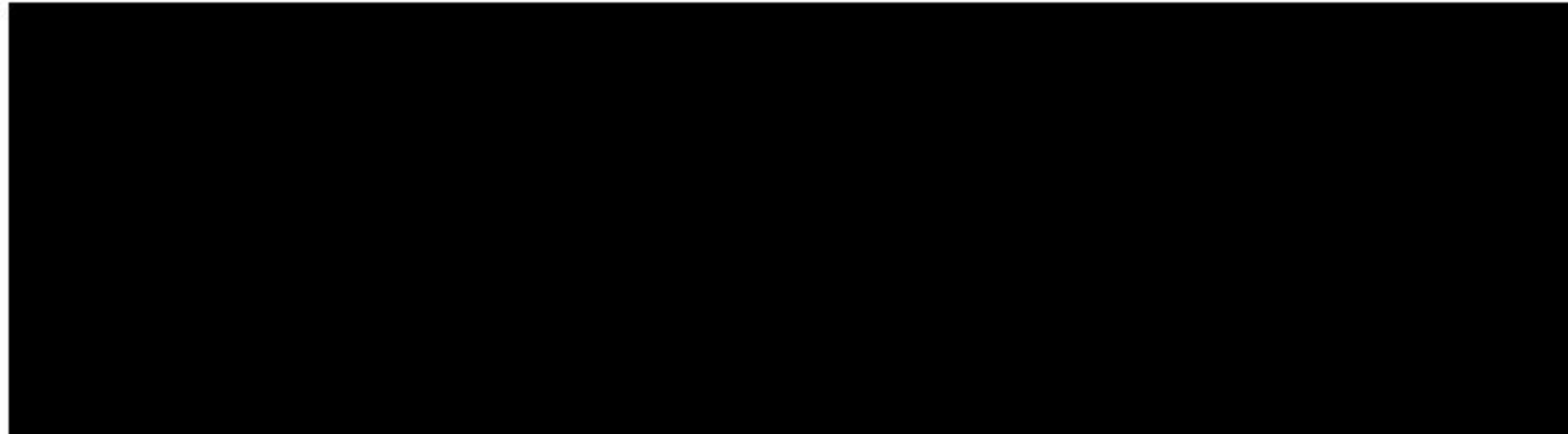
Your Details

Title: **Mr**

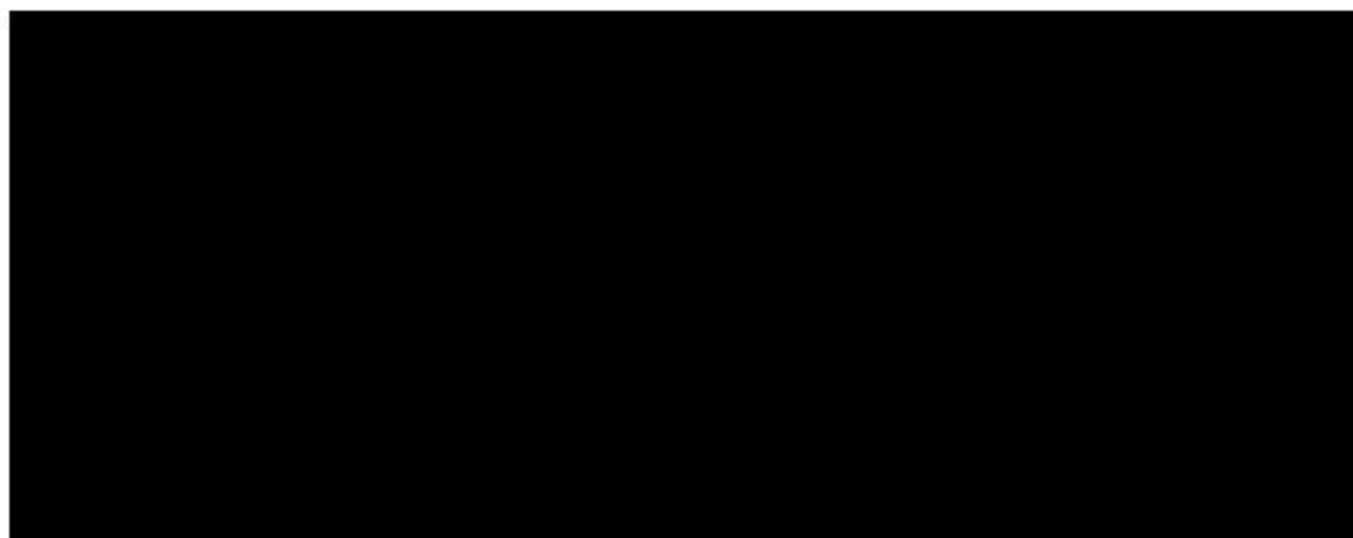
Forename(s): **John**

Surname: **Brady**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **No**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **Yes**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Other Objection

Document commenting on: **Proposal letter**

Comments: **Today I received a letter from Development services outlining the proposed development of 170 houses on site R6 Barhill Road Buckie. The irony of it beggars belief. The letter is dated the 7th of January 2019. The dictionary definition of a proposal is 'a plan or suggestion, especially a formal or written one, put forward for consideration by others'. What I would like to ask is, Why are we receiving this letter now as the building works on site R6 are well underway and Springfield are already constructing houses on it. By the way, we have to put up with increased noise from early morning until late at night. Thanks for that. Sending these letters out to residents close to site R6 is a waste of money as constructions is well under way and with the perilous state of Moray Council finances could have been a tiny wee bit saved.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002086
Date: 25 February 2019 19:12:37

Moray Local Development Plan - Proposed Plan 2019

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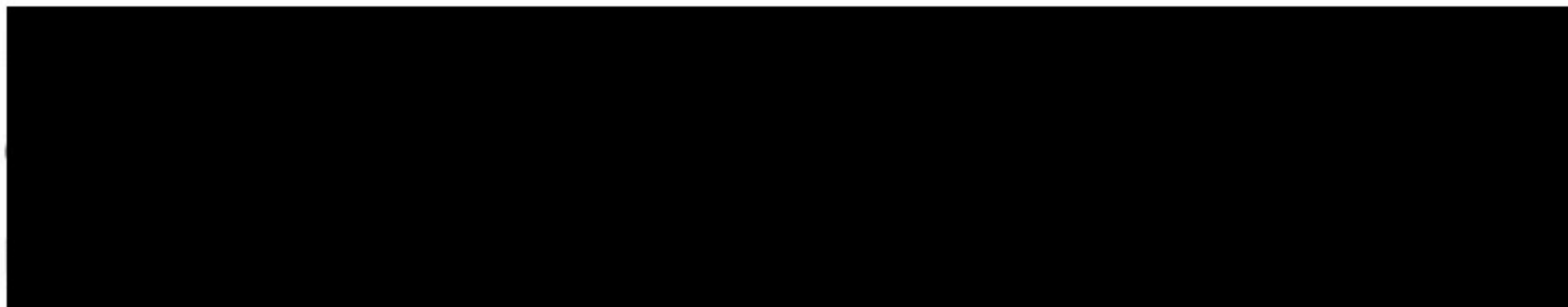
Your Details

Title: **Mr**

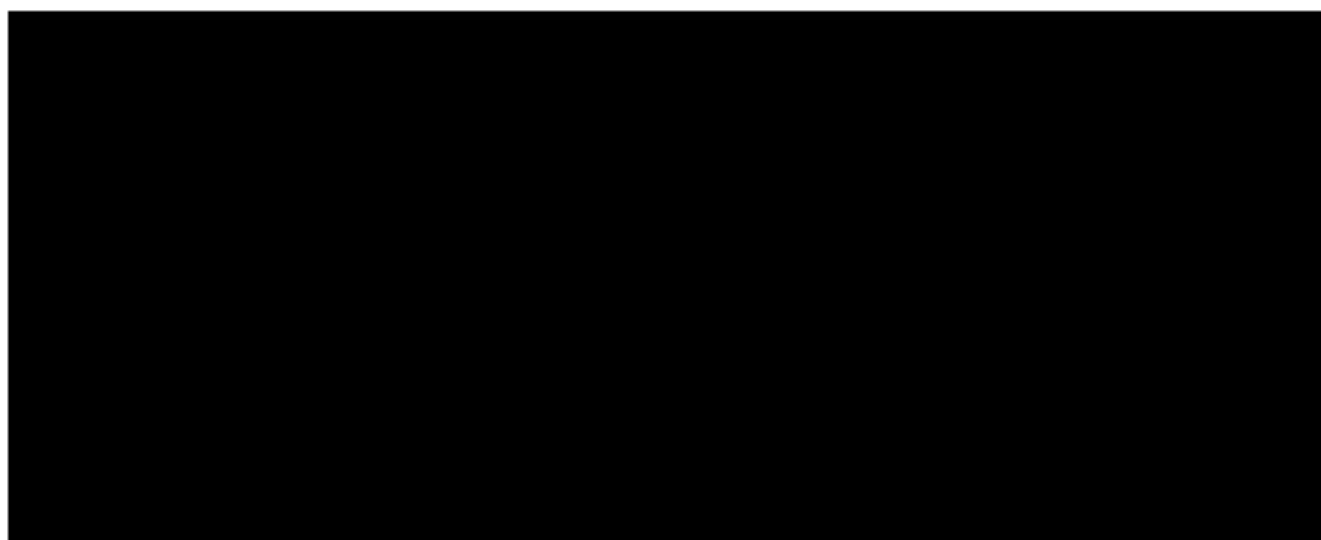
Forename(s): **IAN**

Surname: **BREMNER**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **Yes**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **ELGIN**

Site reference: **OPP11**

Site name: **Walled garden**

Comments: **This site should be used as allotments**

Policy Objection

Policy: **DEL1 Delivery of Effective Sites and Action/Delivery Programme**

Comments:

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002033
Date: 22 February 2019 08:45:04

Moray Local Development Plan - Proposed Plan 2019

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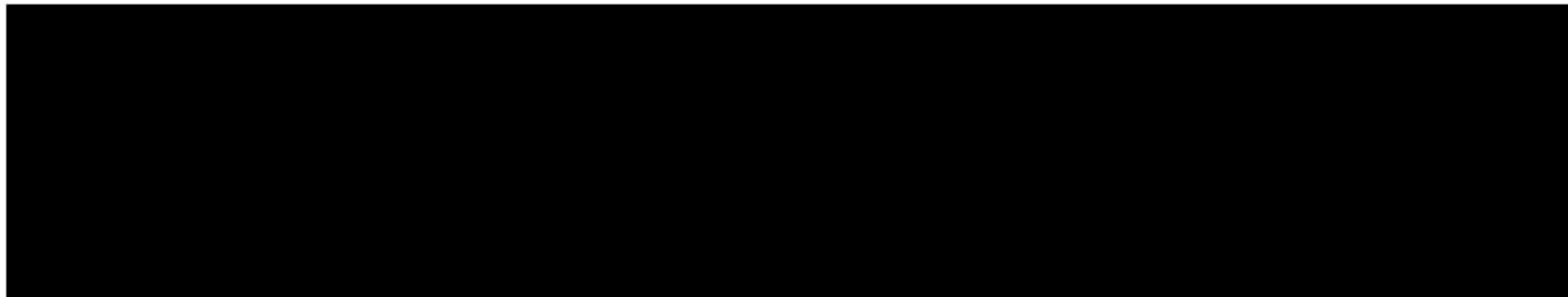
Your Details

Title: **Ms**

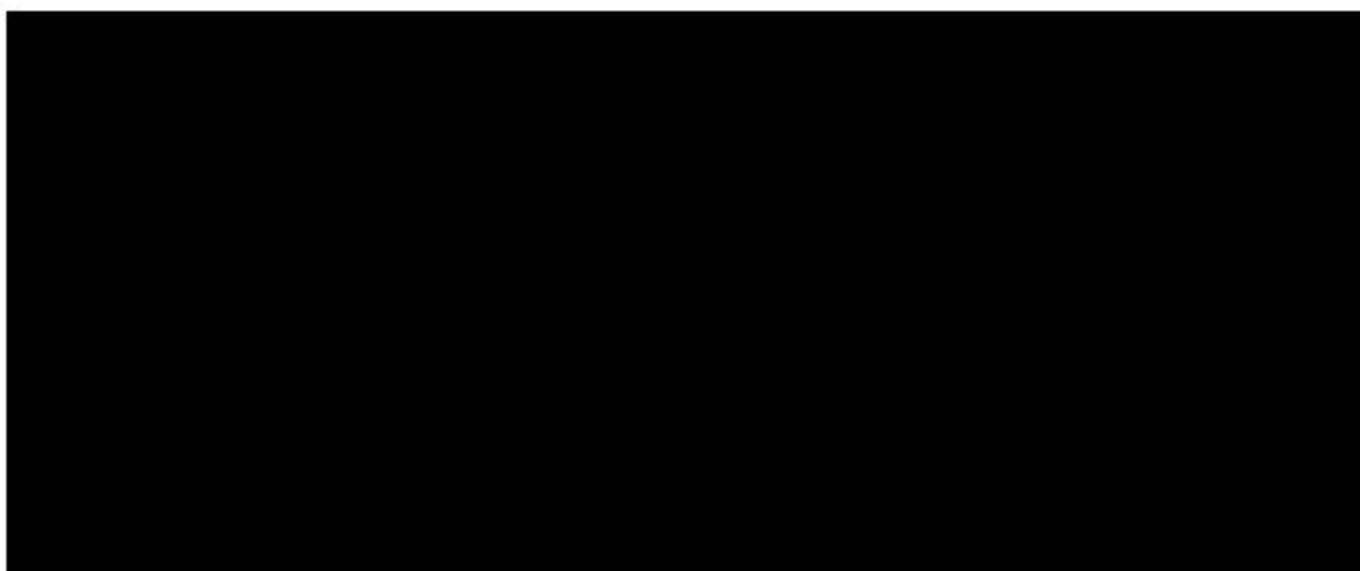
Forename(s): **Andy**

Surname: **Brown**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin Central**

Site reference: **OPP 11**

Site name: **Walled Garden**

Comments: **The Moray College Horticulture department run their classes (school pupils through to HNC courses) at the Biblical gardens next to Elgin Cathedral. They have successfully maintained and developed the gardens in a real life working environment in partnership with the Friends of the Biblical Garden. The proposal submitted by Moray Council is to knock down one of our teaching Porta cabins and remove all of our green houses, potting sheds, tool sheds, 3 poly tunnels and replace it with a 4-5 star hotel in the walled area of Cooper Park. I am shocked and concerned that commercialism is being prioritised over education. Some options I would prefer are: 1. Put the hotel elsewhere. 2. Move the boundary line to the left. 3. Use the walled gardens as an allotment scheme so that all of the educational resources can continue to be used and enjoyed.**

site_obj_name_town_village_grouping : Elgin Central

site_obj_reference : OPP 11

site_obj_name : Walled Garden

site_obj_comments : **The Moray College Horticulture department run their classes (school pupils through to HNC courses) at the Biblical gardens next to Elgin Cathedral. They have successfully maintained and developed the gardens in a real life working environment in partnership with the Friends of the Biblical Garden. The proposal submitted by Moray Council is to knock down one of our teaching Porta cabins and remove all of our green houses, potting sheds, tool sheds, 3 poly tunnels and replace it with a 4-5 star hotel in the walled area of Cooper Park. I am shocked and concerned that commercialism is being prioritised over education. Some options I would prefer are: 1. Put the hotel elsewhere. 2. Move the boundary line to the left. 3. Use the walled gardens as an allotment scheme so that all of the educational resources can continue to be used and enjoyed.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_I6 - 001012
Date: 15 March 2019 16:44:03

Moray Local Development Plan - Proposed Plan 2019

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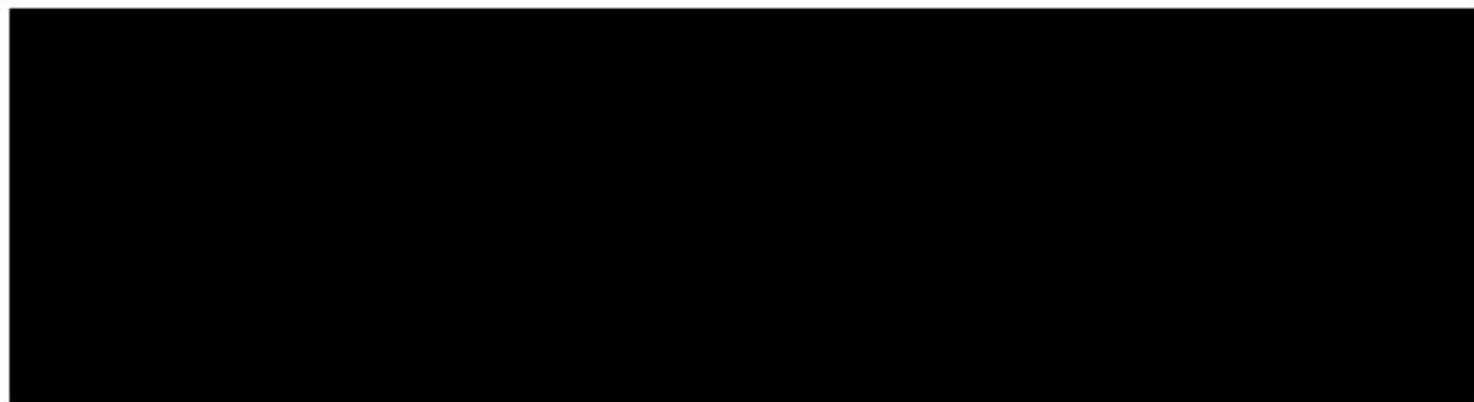
Your Details

Title: **Mr**

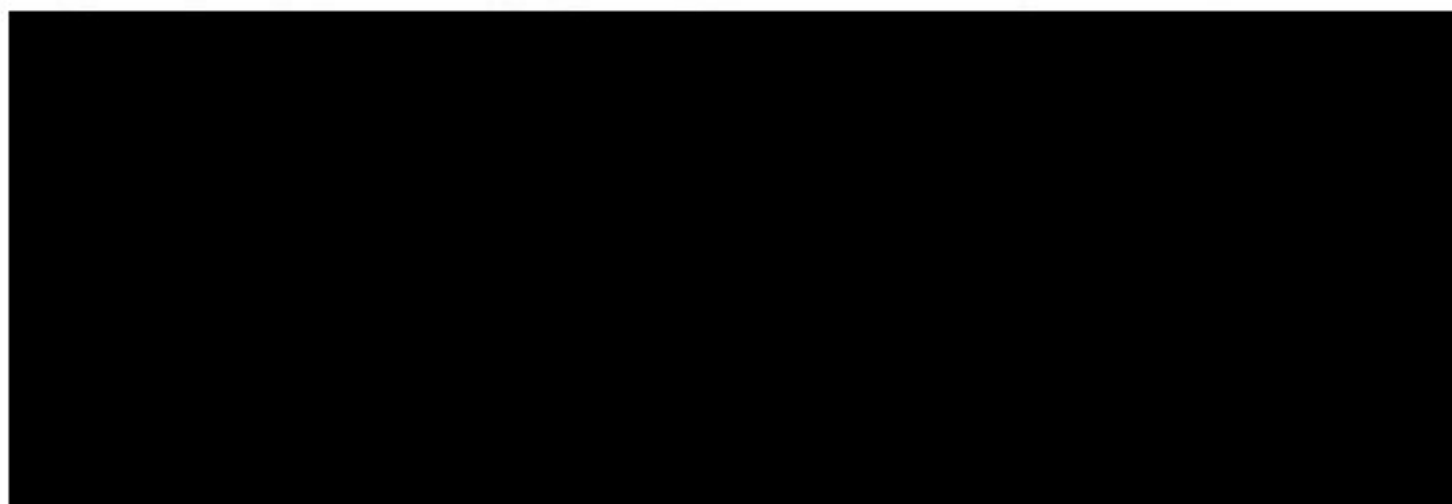
Forename(s): **Jack**

Surname: **Brown**

Your Address

A large black rectangular box redacting the address information.

Contact Details

A large black rectangular box redacting the contact details information.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin**

Site reference: **I6**

Site name: **Linkwood East Industrial Estate**

Comments: **Basis for objection 1.** Whilst it is agreed that the site is suitable for Use Classes 4, 5 and 6 it is requested that the Moray Council consider adding Use Classes 3, 7 and 11 as previously approved by the Council for this site in the planning permission 09/01477/OUT granted 23rd Feb 2011 for the following reasons: 1.1 This range of uses better reflects and compliments what is already developed there, namely two drive through units comprising a KFC restaurant and Costa Coffee Café, a 3000 sq metre Furniture Retail Warehouse and the planning approved car showroom soon to be developed. 1.2 Barmuckity Business Park will be open by the time the MLP 2020 is implemented and this will provide an additional minimum of 14.69 ha for Use Classes 4, 5 and 6 with a further 7.41 hectares available for these use Classes as part of a greater mix of uses including Use Classes 7 Hotel and Hostels and Class 11 Assembly and Leisure. Therefore should market demand allow part or all of the remaining 1.5 ha of I6 to be developed for any of the additionally requested uses this will not cause any significant reduction in supply of land available for Use Classes 4, 5 and 6. 1.3 Neighbouring Barmuckity Business Park has already been allocated Use Classes 7 and 11. 1.4 Had the Access Road constructed in 2012/13 not formed part of a separate planning application these uses would still be permitted for this site
Changes Requested It is requested that the Moray Council add Use Classes 3, 7 and 11 to those use already allocated.

site_obj_name_town_village_grouping : Elgin

site_obj_reference : I6

site_obj_name : Linkwood East Industrial Estate

site_obj_comments : **Basis for Objection** The outcome of planning appeal PPA?300-2012 confirmed that it was unreasonable and therefore unjustified to require the provision of a pedestrian and vehicular access route between I1 and I6 and this condition was removed from consent 09/01477/OUT. It therefore follows that this requirement is unreasonable
Changes Requested it is requested the requirement that ?Proposals must address/ safeguard the potential to achieve a pedestrian and vehicular access between I1 and I6? be removed.

site_obj_name_town_village_grouping : Elgin

site_obj_reference : I6

site_obj_name : Linkwood East Industrial Estate

site_obj_comments : **Basis for Objection** The requirement that 'a pedestrian and cycle connection must be provided to the existing cycle path along the Flood Alleviation scheme embankment is an unreasonable cost to impose on the developer of this site as until the Council introduced a new cycle path to the north of this site this

requirement did not exist Changes Requested The requirement that a pedestrian and cycle connection must be provided to the existing cycle path along the Flood Alleviation scheme embankment should be altered to read that 'a route for a pedestrian and cycle connection should be reserved along the side of the flood alleviation embankment or such as other route as may be agreed by the Moray Council and developer depending on how the site is developed.'

site_obj_name_town_village_grouping : Elgin

site_obj_reference : I6

site_obj_name : Linkwood East Industrial Estate

site_obj_comments : Basis for Objection The requirement for a Flood Risk Assessment should be deleted as the Moray Flood Alleviation scheme has now been completed and protects any part of I6 that may have been vulnerable to flooding. Changes Requested The requirement for a Flood Risk Assessment should be deleted

site_obj_name_town_village_grouping : Elgin

site_obj_reference : I6

site_obj_name : Linkwood East Industrial Estate

site_obj_comments : Basis for Objection The requirement for no development of any type within 6 metres of the Flood Alleviation Embankment is unreasonable and too restrictive as it has already been agreed and permitted with and by the Flood Alleviation team that development of roads, foot ways / cycle paths, car parking and development that does not prevent access to or damage the Flood Alleviation Embankment is permitted within 6 metres of the embankment. See Grampian Furnishers consent 16/01833/APP and Road Alteration to alter 10/00524/APP. Changes Requested The words 'No development within 6m of the embankment.' should be replaced with 'Development within 6m of the embankment should not restrict access to the embankment for maintenance or inspection or effect its integrity. Development of roads, car parking, foot and cycle ways, surfaced yard space or development that does not affect the integrity of the embankment or restrict access is permitted'

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002071
Date: 22 February 2019 22:01:29

Moray Local Development Plan - Proposed Plan 2019

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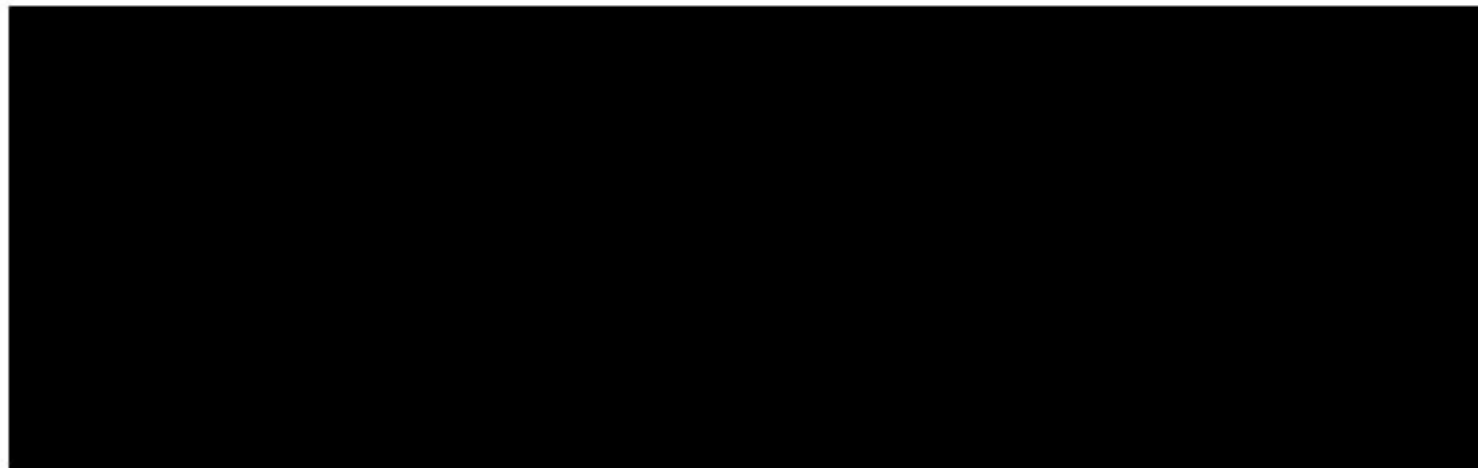
Your Details

Title: **Mrs**

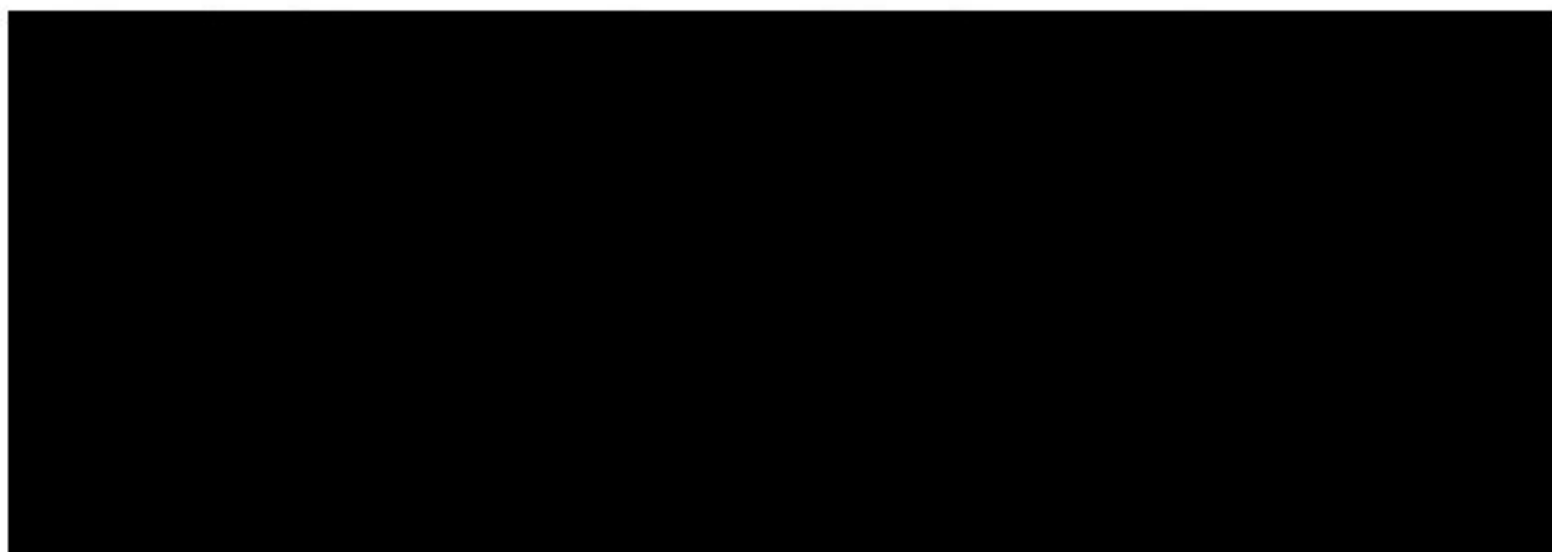
Forename(s): **Maggie**

Surname: **Brown**

Your Address



Contact Details



Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin Central**

Site reference: **OPP 11**

Site name: **Walled Garden**

Comments: **This is a beautiful tranquil site which complements the cathedral. I visit Elgin every year and this is one of the first places I stop at. So peaceful. We need open spaces like this, they are the lungs that help our towns and cities breathe. 44,000 visitors per year can't be wrong. I understand there may also be a knock on effect for horticultural students from Moray College.. The plot of land, currently occupied by greenhouses, potting sheds, polytunnels and tool sheds are used by the team who tend the garden - a mix of volunteers and horticulture students. Greenfingers Training Services which works with adults with learning difficulties also make extensive use of the facilities. Given the numbers of people who will be affected, would it not be simpler to find another site for a hotel' I hope a solution can be found as I would hate to see the garden close.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002174
Date: 13 March 2019 20:51:26

Moray Local Development Plan - Proposed Plan 2019

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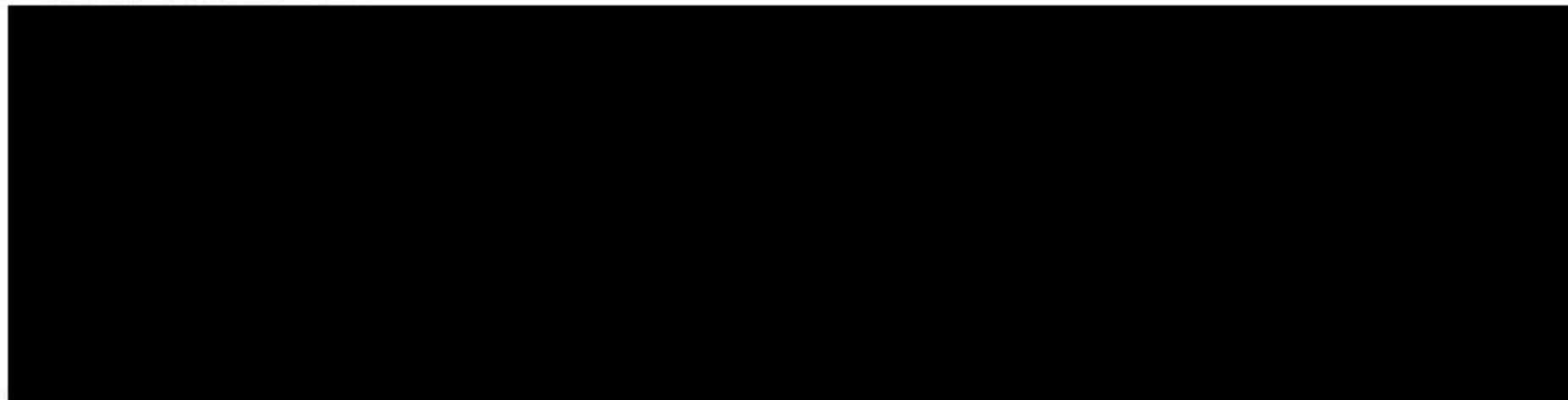
Your Details

Title: **Dr**

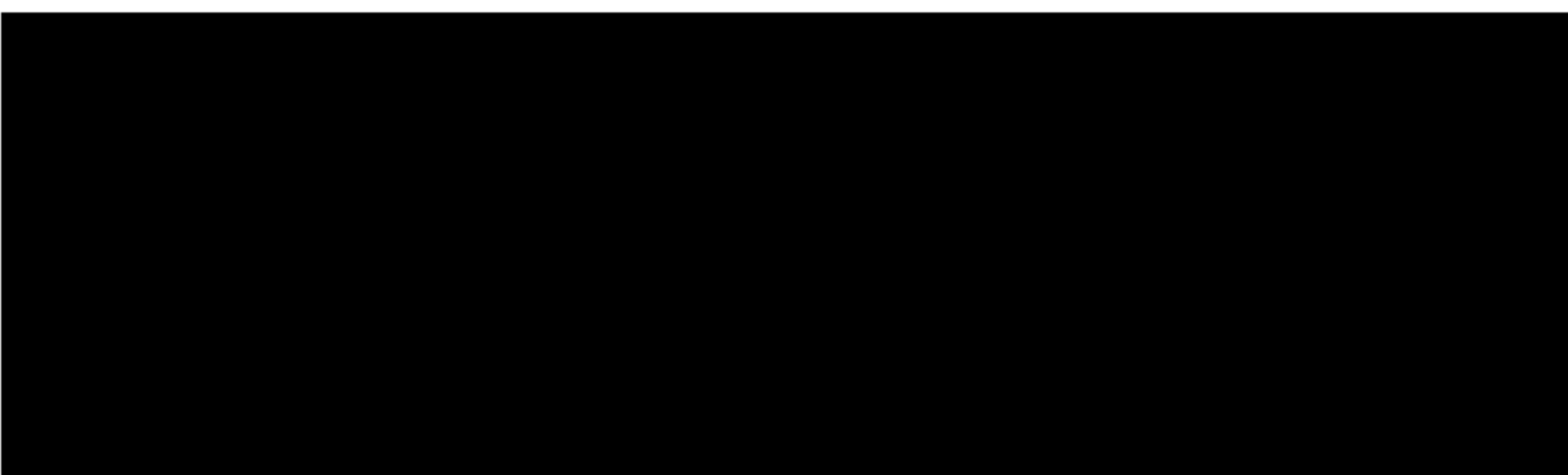
Forename(s): **Miriam**

Surname: **Brown**

Your Address

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Contact Details

A large black rectangular box redacting the contact details information.

Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin**

Site reference: **OPP11**

Site name: **walled garden**

Comments: I am objecting to the sale of the walled garden in Elgin as outlined in **OPP11**. I am in sympathy with the Council's need to raise funds and as part of this to sell off vacant/derelict land and empty properties to raise money to balance the budget. However, part of OPP11 is most definitely neither vacant or derelict. Infact it is the working hub of The Biblical Garden. Within it is a classroom for the training of horticulture students, green houses, a potting shed and cold frames for the cultivating of plants to be used in The Garden. Also, sheds to store all the lawnmowers, hedge trimmers, rakes and hoes etc necessary for the upkeep of The Garden. These resources are all used daily during the week. Relocation of these facilities is not a viable option and thus selling the land would lead to the closure of the garden. The sale of land would mean the end of the Horticulture courses at Moray College, the only college to run such courses north of the central belt. Few of the local students would be in a position to undertake training elsewhere. This would be a huge loss to the ability of this area to retain young people who might otherwise relocate along with their skills, talents and contribution to the community. The Biblical Garden is a well used, well loved and beautiful sanctuary in Elgin, peaceful and tranquil. Its popularity is growing, many local groups use it and it attracts tourists thus boosting the local economy. Selling this land is a short sighted proposition which would lead to the loss of many future riches ? cultural, economic and social.

Please use [this link](#) to view and retrieve the uploaded attachments.

From: eforms@moray.gov.uk
To: [Localdevelopmentplan](#)
Subject: EL_R22 - 002172
Date: 13 March 2019 20:27:27

Moray Local Development Plan - Proposed Plan 2019

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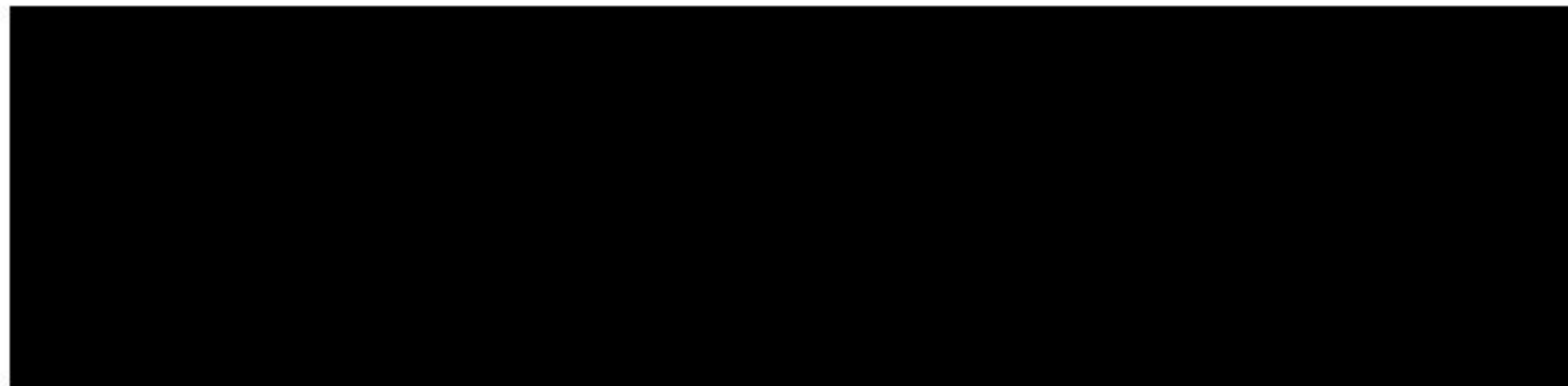
Your Details

Title: **Mr**

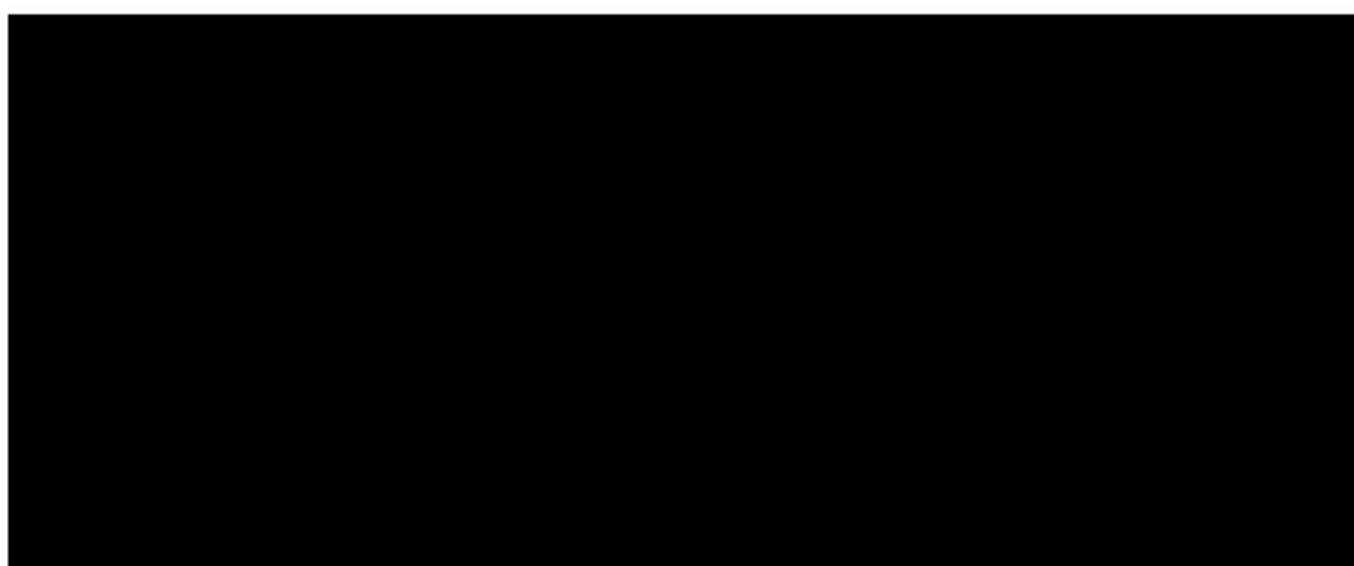
Forename(s): **Iain**

Surname: **Buften**

Your Address



Contact Details



Agent Details

Do you have an agent: **No**

Response

Do you want to object to a site?: **Yes**

Do you want to object to a policy, the vision or spatial strategy: **No**

Other: **No**

Supporting information: [Download supporting document](#) Available also via link at bottom of this email.

Site Objections

Name of town, village or grouping: **Elgin**

Site reference: **R22**

Site name: **Spynie Hospital**

Comments: **We object to the proposed building plans which would be right beside our [REDACTED] Building adjacent to us would have a direct impact on our privacy, property value and site/location/corner plot status. Also, there are red squirrels and deer living on the land proposed for building on.**

Please use [this link](#) to view and retrieve the uploaded attachments.

From: [REDACTED]
To: [Localdevelopmentplan](#)
Subject: GM_R1 - 000633
Date: 15 March 2019 11:57:28

I am writing in connection with the proposed plan in particular Garmouth R1 south of Innes Road.

I strongly advise that the proposal is reconsidered with a view to taking it off the table. There are a number of reasons to support my view but primarily infrastructure and road safety within the village of Garmouth.

The infrastructure of the current sewage system is unable to support a development of this nature and certainly road safety in the village within the immediate confines of the proposal would be severely compromised.

It is well documented in regard of sewage capacity and infrastructure that Garmouth and Kingston is already operating at its limits. This coupled with flooding of the Spey and high water tables causes back up of sewage which, currently, requires investment to maintain the service at existing levels.

Equally as important is the road safety issue. Innes Road is extremely narrow, under 15ft at numerous points with no opportunity for widening. There are no footpaths and despite the 20 MPH speed signs traffic frequently exceeds the legal limit on Innes Road. There are regular altercations with traffic facing each other in a stand-off situation. Children have to navigate this stretch of road daily to connect with the school bus in the village, they do not have footpaths or refuge from traffic. Farm vehicles travel the road with only a few inches clearance each side.

The road, as you will be aware, is also part of the Sustrans National Cycle Way and as such cyclists regularly practice singularly or in groups at speed in pursuit of timing trials. Minor car scrapes and blockages are regular occurrence. It would appear to be nonsensical to allow more traffic from this proposed development onto a road that already has safety issues.

I ask you to reconsider whether this development is really necessary at this time on the identified site.

Thank you for your attention,

[REDACTED]

15 March 2019