

From: [REDACTED]
To: [Localdevelopmentplan](#)
Subject: DP4 - 002006
Date: 05 February 2019 15:45:21

Good afternoon

We have just had our first read through of the above development plan and find ourselves largely in favour of it.

Naturally, as dwellers in one of the open countryside areas that have seen ribbon development over the past 15 or so years, we are extremely thankful for the guidance notes on future types of development. Hardly any house built along our lane since the millenium has conformed in any way to the vernacular building style,neither in design nor in size and with many a large house "planted" in a "garden" far too small in relation to the house size. It has long been distressing to see that the planning department were continuing to approve many such eyesores. Or where they were rejecting them, to see our local councillors on the planning committee riding roughshod over those refusals.

Sensitive developement could have created over the last couple of decades a rejuvenated sense of community - which we found when moving to the area in 1990 but which gradually withered as the only houses being built nearby were obviously designed for incomers(of all persuasions) with large incomes who seemed to have no desire to take part in the community that existed.Now many of those who constituted the "community" inthe past have died or of necessity moved on to places more accessible to their needs. We are left with a row of houses, sporadically spaced along the lane and whose occupants cannot easily take an afternoon stroll without the risk of being mown down by a harried delivery driver or a newcomer,not understanding the nature of the area, who sees the "quiet lane" as somewhere he can safely speed.

So a qualified welcome to a document which we hope will be accepted in due course and,in particular,where the guidance will be followed strictly.

Mrs and Mrs Robert Ince
[REDACTED]

From: [Angela Innes](#)
To: [Localdevelopmentplan](#)
Subject: EL_OPP11 - 002135
Date: 08 March 2019 14:36:50

Dear Sir/Madam

I wish to raise my objection to the proposed siting of a hotel on the area currently utilised by The Biblical Gardens.

The Gardens are a positive asset to many members of the community and a true asset to locals and visitors alike.

I truly cannot comprehend any planning decision which will ultimately end in the closure of the gardens or of the growing and training facilities.

At a time where care of the natural environment needs to be fostered more than ever and the importance of the outdoors is recognised as being beneficial to everyone's mental health, I fail to see your rationale.

I appreciate we all want to grow the economy of Moray forward but this can be done without damaging a fantastic resource which is a true gem both for locals and visitors. Please rethink your proposal and devise a plan which accommodates all needs in a community minded way.

Regards

Angela Innes

Angela Innes



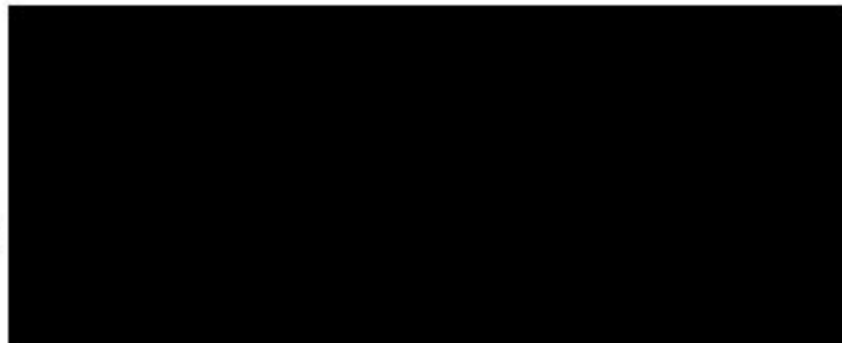
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INNES COMMUNITY COUNCIL

OBSERVATION REPORT ON DEVELOPMENT OFF MEFT ROAD, URQUHART PLANNING REFERENCE: URQUHART R1 PLANNING APPLICATION: 18/01225/SCN

Following discussion at a recent meeting of Innes Community Council, and representation by a number of residents in the area, ICC wishes to make the following observations in respect of the proposed development off the Meft Road, Urquhart.

- The site was originally designated for a total of 20 houses, and rather than having the development split into two phases of 10, it would be preferable for the development to be treated as one to maximize the number of affordable houses that should be provided under Moray Council's development policies. By splitting the development into two phases this could reduce the number of affordable houses by one. There is a demand for affordable housing, particularly from young people to enable them to continue to live in the area they grew up, so any development should maximize this possibility. Also, additional employment opportunities are arising in the area, and the opportunity to encourage young people to remain in Moray again complements the Council's policies.
- By treating the development as one, this would hopefully reduce disruption to residents, particularly those whose properties are close to the site.
- As the entrance to the development will be close to the King George V Playing Fields and also the car park for the Parish Hall, it is essential that road safety measures are taken to ensure that traffic speeds are kept low, and that sight lines are clear.
- The development will naturally mean additional traffic within the village. Sight lines are a problem at a number of junctions, particularly Meft Road and Main Street, and Main Street and Station Road. In addition, the turnings from the Church Hall/cemetery and the property opposite into the entry road into the village from the Garmouth Road are "blind", so attention will need to be given to the impact additional traffic will have. Parking in Main Street already causes a problem, in addition to making it difficult for people exiting their own driveways to see whether it is clear to drive out. The new development should ensure there is no additional on street parking in the village.
- As a development of this size will have a considerable impact on the infrastructure of the village, it is important that consideration is given to the provision of footpaths/cycle paths to link Urquhart with the neighbouring community of Lhanbryde, and the facilities available there including the Primary School, Pharmacy and retail establishments, as well as linking with main public transport links. Moray Council currently provides a bus service on Monday to Friday that services Urquhart, but there is no public transport at weekends.
- Any development of this size will also have an impact on the community facilities available within the local area and consideration should be given to additional consultation with the

Management Committee of the Parish Hall/Playing Fields, as well as the wider community, into what additional facilities/activities they would like to see provided.

These observation are submitted on behalf of Innes Community Council.

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

Onshore Wind Development

Date: 12 March 2019



12 March 2019

By email only to localdevelopmentplan@moray.gov.uk

Dear Sir/Madam

Consultation Response: 'Moray Local Development Plan 2020 – Proposed Plan'

This response is made on behalf of innogy Renewables UK Ltd (innogy) which develops, owns, operates and maintains a portfolio of onshore wind, offshore wind and hydro-power generating stations across the UK. innogy welcomes the opportunity to contribute to the Moray Council (MC) consultation on the Draft Moray Local Development Plan 2020 ('the Proposed Plan') which has a bearing on our development activities in Scotland.

innogy **object** to the Proposed Plan. This objection is raised specifically in relation to the onshore wind elements of policy DP9 Renewable Energy and the Wind Farm Spatial Framework which forms part of this, policy EP3 Special Landscape Areas and Landscape Character, and policy EP8 Historic Environment. Our comments are below.

Policy DP9 Renewable Energy and the Wind Farm Spatial Framework

1. With reference to policy DP9 b vi) 'Other' on page 62, it states that "the proposal avoids or adequately resolves other impacts...". We propose that changes are needed to this wording as it is not reasonable to require that proposals avoid or resolve impacts. Avoidance should be where possible, and where this is not possible, acceptable mitigation may not equal resolution (although it is not clear what is meant exactly by the term 'resolution'). In addition, some adverse impacts may nevertheless be acceptable when considered in the planning balance. We suggest that this wording is changed, similar to other paragraphs in this policy, to "avoid or address any impacts".
2. Map 2 – Wind Farm Spatial Framework
 - a. The blanket application of the Group 2 Spatial Framework criteria in relation to peat is inappropriate. The SNH Peat Map which is to be used for the preparation of Spatial Frameworks states that the map can only *indicate* that carbon-rich soils, deep peat and priority peatland habitat are likely to be present, and will be helpful in the initial site

selection process undertaken by developers. The caveat that more detailed site-specific information may refine such areas isn't recognised in the Proposed Plan.

- b. A Settlement 2km buffer and Rural Groupings 2km buffer is applied at Map 2. SPP Table 1 does indicate a 2km separation distance from settlements and states that this should be *"an area not exceeding 2km around cities, towns and villages identified on the local development plan with an identified settlement envelope or edge. The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement"*.

Rural Groupings are included on Map 2 alongside Settlements with a 2km buffer applied. With reference to the Proposed Plan Volume 3 Rural Groupings, these areas are identified as clusters of houses with additional amenity land and potential areas of development. As the boundaries defined include potential developable areas for housing, they do not constitute existing settlement boundaries. In addition, some of the Rural Groupings identified are formed from a few dwellings with additional developable areas and do not constitute a settlement. Therefore innogy suggest that not all Rural Groupings identified meet the criteria of a Group 2 Area of Significant Protection. Rural Groupings have been identified for the purpose of directing residential development in rural areas and it is not appropriate to simply use these boundaries as SPP Group 2 Areas of Significant Protection. Innogy propose that inclusion of Rural Groupings is, in part, contrary to SPP and requires review.

As above SPP states that *"The extent of the area will be determined by the planning authority based on landform and other features which restrict views out from the settlement"*. This ability to refine areas is not recognised in the Proposed Plan which has simply been mapped as a blanket 2km buffer zone. Evidence should be provided to demonstrate that the planning authority has considered landform and other features in reaching a conclusion on the 2km buffer.

3. Map 3 – Policy Guidance Map for Large Typologies

- a. innogy consider that the turbine typologies identified in the Proposed Plan do not accurately reflect the rapidly changing nature of onshore wind development. The large typology at 80m to 130m to tip are not what the industry would consider 'large'. The onshore wind industry now regularly consider turbines up to and above 200m to tip. The typologies considered in the Proposed Plan are already out of date whilst the Proposed Plan is still in draft form.

The Moray Wind Energy Landscape Capacity Study 2017 does recognise that the industry are developing wind turbines at heights up 150m and 200m to tip, and we welcome this. However, turbines at this tip height are only considered in a repowering scenario. It is not clear why this is the case. It appears to be assumed that turbines at this scale only need to be considered for repowering existing sites. It is stated that all operational and consented turbines fall within the large turbine typology (80m to 130m) (paragraph 2.7.3),

however, this does not mean that new applications will continue to fall within this category.

innogy suggest that this assumption is now reflected in the Proposed Plan and needs to be addressed in order for the policy to provide a working spatial framework for wind, and for it to be of assistance in determining all new wind farm applications (repowering and greenfield developments).

- b. The policy suggests there is scope for Very Large Typologies to 150m, and should be reflected in Map 3.
- c. The Areas of Greatest Potential in Map 3 contain a number of operational and consented wind farms and therefore cannot be considered as areas of search for new development. The Areas of Greatest Potential marked give an inaccurate view on potential. We propose that the requirements of SPP in identifying strategic capacity are not being met where areas that are identified already contain existing wind farms. We suggest that these areas are differentiated, with an explanation in the policy.

Policy EP3 Special Landscape Areas and Landscape Character – I) Special Landscape Areas

1. Special Landscape Areas do not fall into Group 1 or 2 of SPP Table 1, and can therefore be considered as Group 3 areas. Policy EP3 should include onshore wind farm proposals as a potentially acceptable use of Special Landscape Areas.
2. In paragraph 1 this policy states that proposals should “*avoid adverse effects on the landscape and visual qualities the area is important for*”. Adverse effects may still be acceptable. This policy should be reworded with the insertion of the word “unacceptable” after “avoid”.

Policy EP8 Historic Environment

1. a) Scheduled Monuments and National Designations

With reference to the wording “*unless the developer proves that any significant adverse effect on the qualities for which the site has been designated are clearly outweighed by social or economic benefits of national importance*”, SPP paragraph 145 Scheduled Monuments, states that “permission should only be granted where there are exceptional circumstances”, rather than “social or economic benefits of national importance”. We suggested that the wording should be changed to reflect SPP. This change to reflect SPP will allow the materiality and weighting of any benefits to be assessed by the decision maker.

2. b) Local Designations

innogy suggest that the wording of the policy needs to be revised as the measures proposed go beyond what is suggested in SPP paragraphs 150. And 151. - Archaeology and Other Historic Environment Assets.

Paragraph 1 should include the word “*unacceptable*” as adverse effects may still be acceptable.

At bullet point 1 the word “local” should be removed from “*Local public benefits clearly outweigh the archaeological value of the site*” as benefits may be national in nature and also justify an (un-acceptable) adverse effect.

Bullet point 2 states that where there are adverse effects proposals will be refused unless “*There is no suitable alternative site for development*”. We suggest that this point should be removed as SPP does not require this, and consideration of alternatives is not a reasonable request.

At Bullet point 3, we suggest that this wording requires revising. It may be the case that adverse effects cannot be mitigated, but that the adverse effects are found to be acceptable by meeting the test set out at bullet point 1, whereby the benefits of the proposal outweigh the archaeological value of the site.

Conclusions

In conclusion, there are a number of issues arising with the above policies which require to be addressed. I trust that these points will be fully taken into account. Should you require any further information or clarification on matters raised please do not hesitate to contact me directly.

Yours faithfully,

Rowan Brentley
Renewables Developer
Innogy Renewables UK Limited

From: [Isabel MacColl](#)
To: [Localdevelopmentplan](#)
Cc: [Isabel MacColl](#)
Subject: EL_OPP11 - 002101
Date: 27 February 2019 10:00:42

Disappointed to hear that Moray Council are possibly selling this area for development. I would have thought this would be a protected area.

The biblical garden is a beautiful, peaceful, tranquil area despite being in the town. I am sure that many people like myself find it relaxing to have a walk round this and just sit and feel their worries fade even if it is for a short time. Some people don't have transport to enable them to go for walks in the country and this is the next best thing, as you do not get the feel of being in the town, you feel you are away from it all. My grandchildren love this area and have decided that this is where the fairies live. I would imagine the schools use this area if taking the children out to enhance religious education.

I am sure there are many other reasons that people would like this area kept. The above paragraph highlights a few.

I sincerely hope that Moray council will reconsider and ensure this area is protected for the unforeseeable future.

Isabel MacColl

Sent from my iPad Isa