

**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002085  
**Date:** 25 February 2019 16:12:34

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

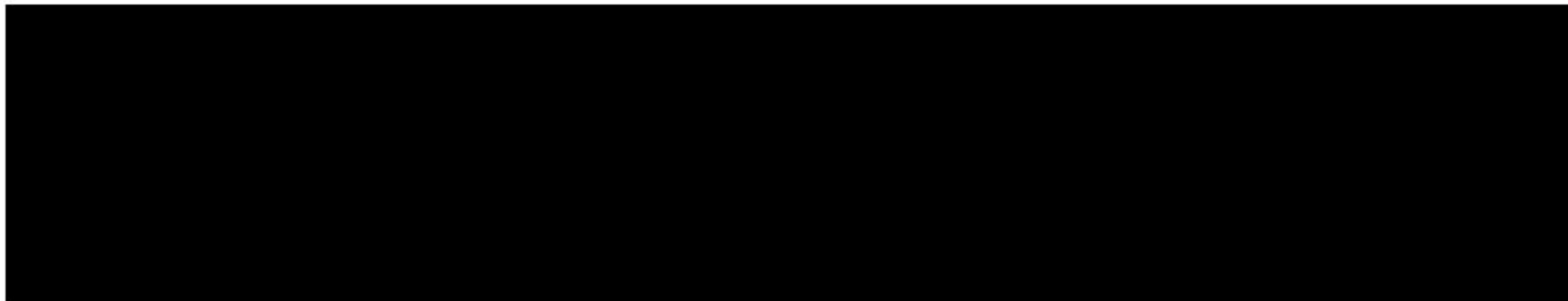
### Your Details

Title: **mr**

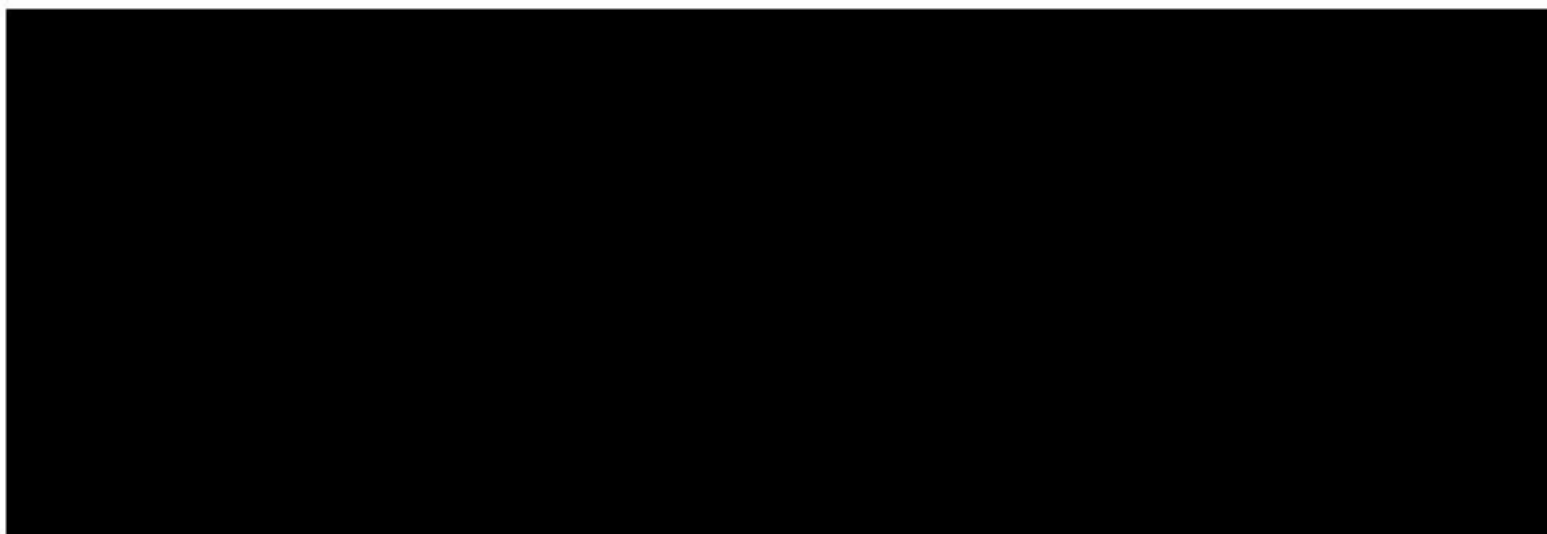
Forename(s): **ellice**

Surname: **walker**

### 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: **biblical gardens**

Site reference: **biblical gardens**

Site name: **biblical gardens**

Comments: **keep the biblical gardens**

## Policy Objection

Policy: **EP11 Battlefields, Gardens and Designed Landscapes**

Comments: **keep the biblical gardens**

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

**From:** [Alison Walton](#)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 001735  
**Date:** 14 February 2019 00:49:24  
**Attachments:** [objections to OPP11.docx](#)

---

Hello,

I am writing to object to the proposal that the site at OPP11 - 'The Walled Garden' - better known as Elgin Biblical Garden and Moray College Horticultural Campus - is 'vacant or derelict', and is proposed to be sold for redevelopment.

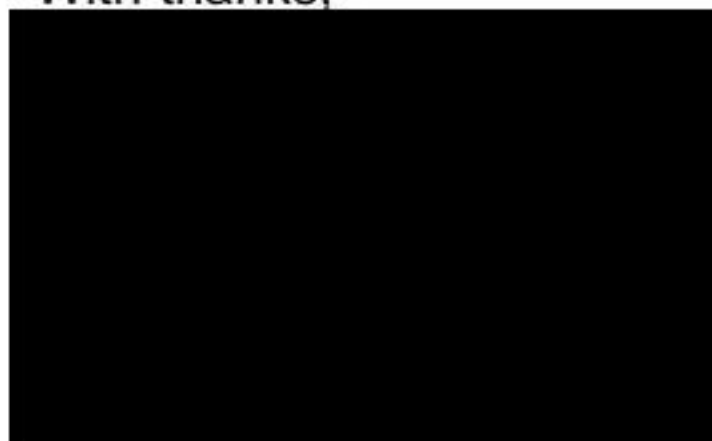
My objection is in two parts.

A. That this site has neither vacant nor derelict, and has been wrongly classified as an 'opportunity' site and should be redesignated as EP11 'Battlefields, Gardens and Designed Landscapes' - additionally, the title 'Walled Garden' misleading and incorrect.

B. The loss of the Moray College Horticultural Campus, and the detrimental effects of this on the Elgin Biblical Garden and the wider implications for horticultural training in the North-East of Scotland.

Please see my attached report for a fuller explanation of my reasons, and the evidence for objecting to this proposal.

With thanks,



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002183  
**Date:** 14 March 2019 18:09:01

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

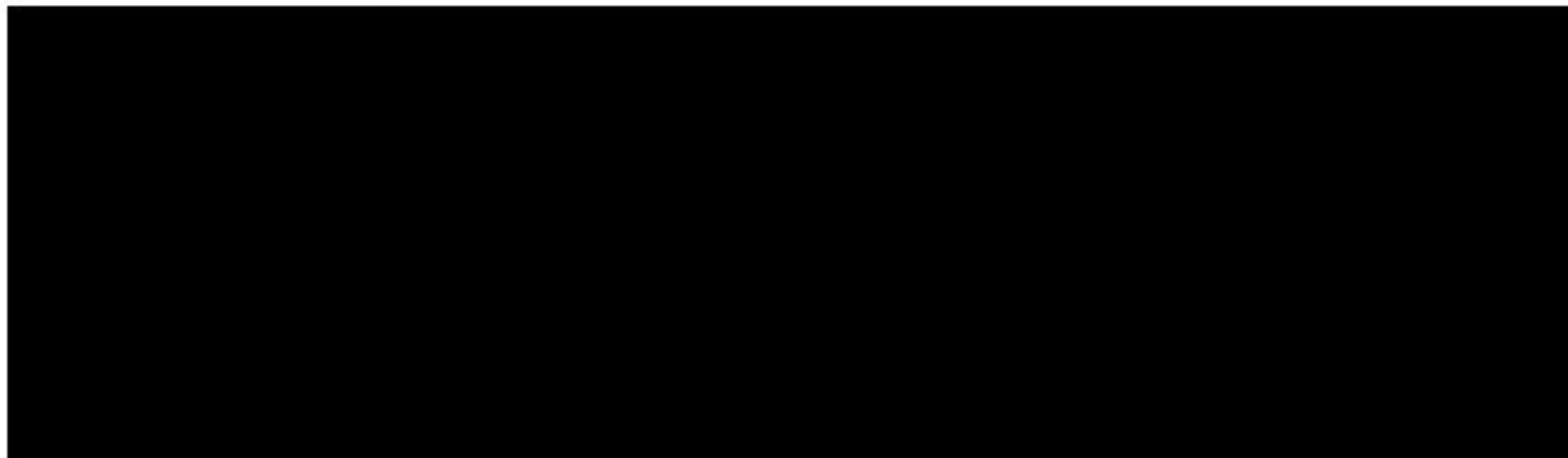
### Your Details

Title: **Mr**

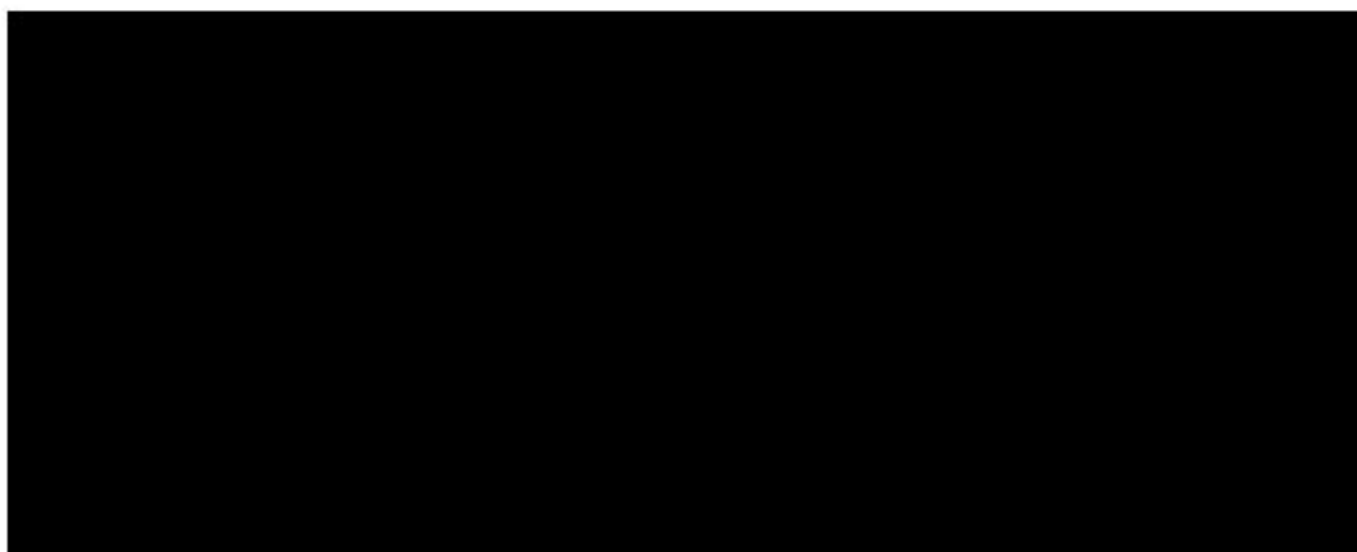
Forename(s): **Jim**

Surname: **Walton**

### 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: **Central Elgin**

Site reference: **OPP11**

Site name: **The Walled Garden**

Comments: **No more hotels are needed in Elgin or Moray in general, especially not on sites of importance for gardening, nature, wildlife preservation and of educational interest.**

## Policy Objection

Policy:

Comments:

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

**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002095  
**Date:** 26 February 2019 11:26:42

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

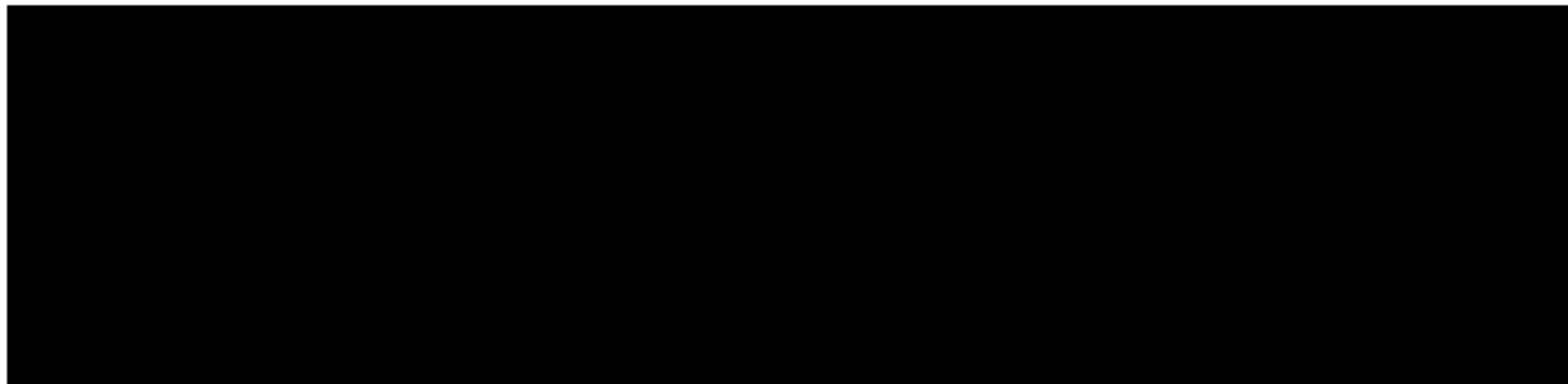
### Your Details

Title: **Ms**

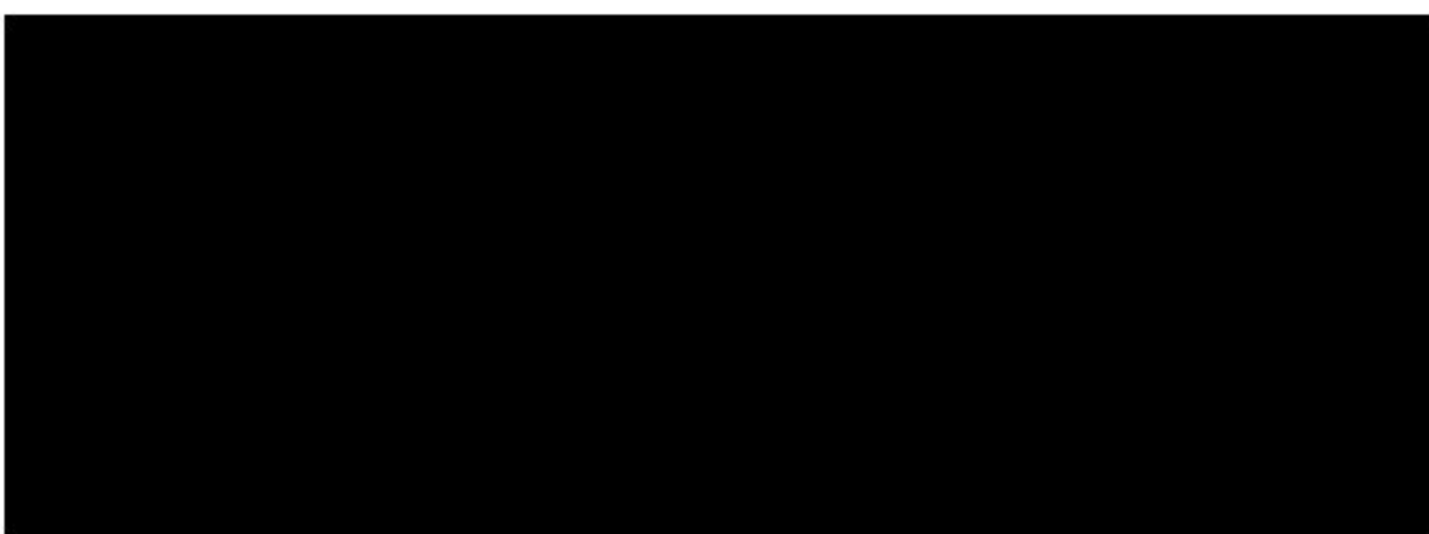
Forename(s): **Frances**

Surname: **Wardhaugh**

### Your Address



### 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: **Yes**

Other: **No**

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

## **Policy Objection**

Policy: **DP6 Mixed Use (MU) and Opportunity Sites (OPP)**

Comments: I object to the proposal to build an hotel in place of the Biblical Gardens and adjoining area. The gardens and adjoining area are necessary for the practical development of the horticulture students from Moray College and pupils throughout Elgin. The education cabin, potting sheds and storage facilities are utilised by the students and the friends of the Biblical gardens. The gardens provide a place of peace and quiet. Somewhere to go for reflection for the people of Elgin. They are visited regularly by tourists. If Elgin needs a 5 star hotel surely Grant Lodge would be the ideal site for it. The walled garden could become an allotment area. The thought of the gardens being ripped out and grassed over if the students don't maintain them is horrible. The Biblical gardens are an enhancement to Elgin

policies\_list : DP6 Mixed Use (MU) and Opportunity Sites (OPP)

policy\_obj\_comments : I object to the proposal for the land adjoining the Biblical Gardens. See above

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



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** AM\_SITEA and AM\_SITEB - 002226  
**Date:** 14 March 2019 20:29:41

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

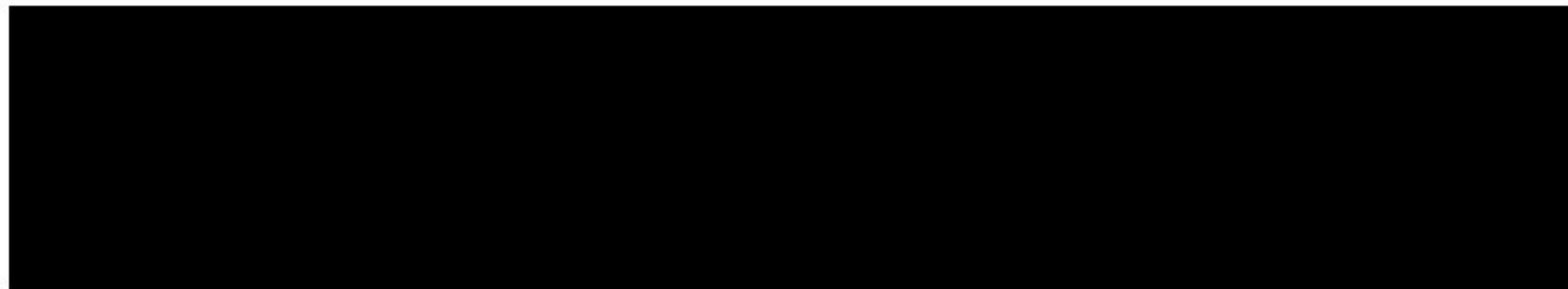
### Your Details

Title: **Mrs**

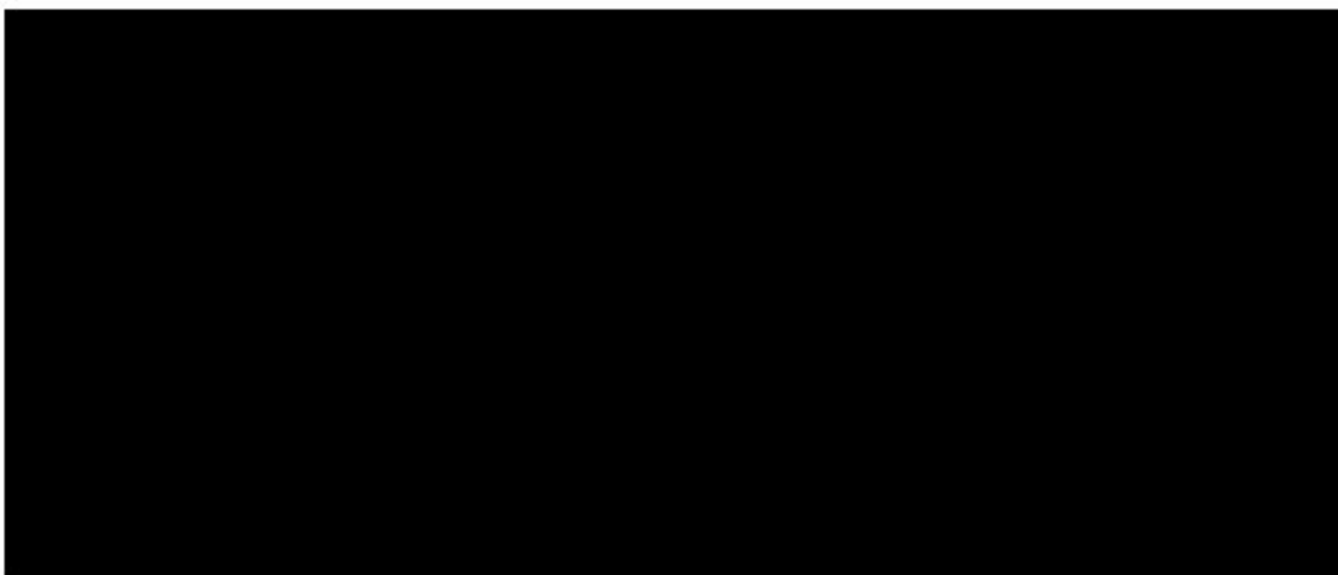
Forename(s): **Kelly**

Surname: **Watt**

### 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: **Yes**



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

## Site Objections

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

Site reference: **Aultmore**

Site name: **Aultmore site a and b**

Comments: I'd like to oppose planning for site a and b. I'm highly concerned adding house on this site will be detrimental to my property regards to flooding. As it stands, the road side edge of my garden floods significantly in Bad weather, with a river running down the road, as also happens to the house further down at the junction (same side of road) I fail to see how filling the field with concrete will help this if not make it worse for both our properties. Adding extra houses to area which has no public transport links anywhere. We've already seen proposals for schools to have there assistants removed and you wish to add extra pressure on the schools by putting up more housing. If houses are granted for this area I would like to think the council will ensure these homes are in keeping with the area, considering all homes at this side of the road and across are distillery cottages, and aged.

## Other Objection

Document commenting on: **Aultmore**

Comments:

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

**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** KU\_SITEA - 002079  
**Date:** 25 February 2019 13:36:37

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

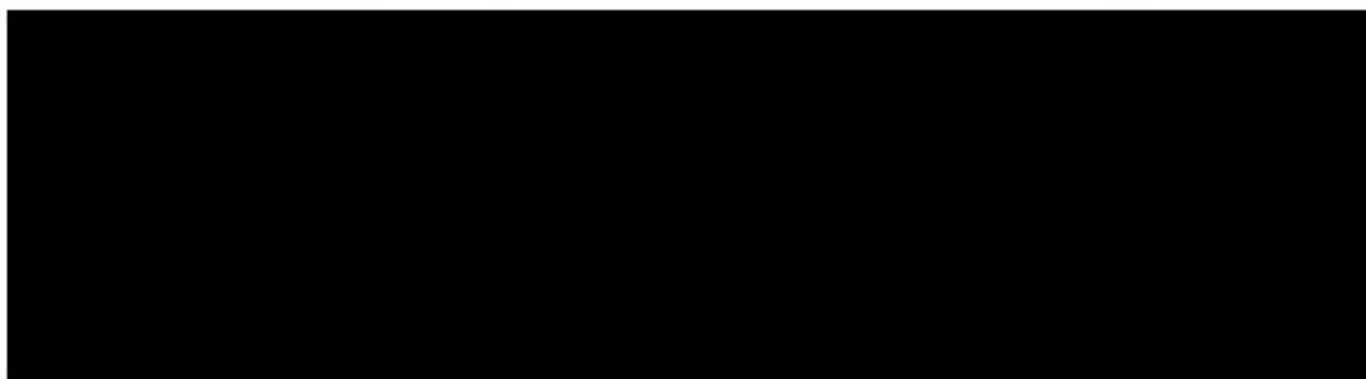
### Your Details

Title: **Mr.**

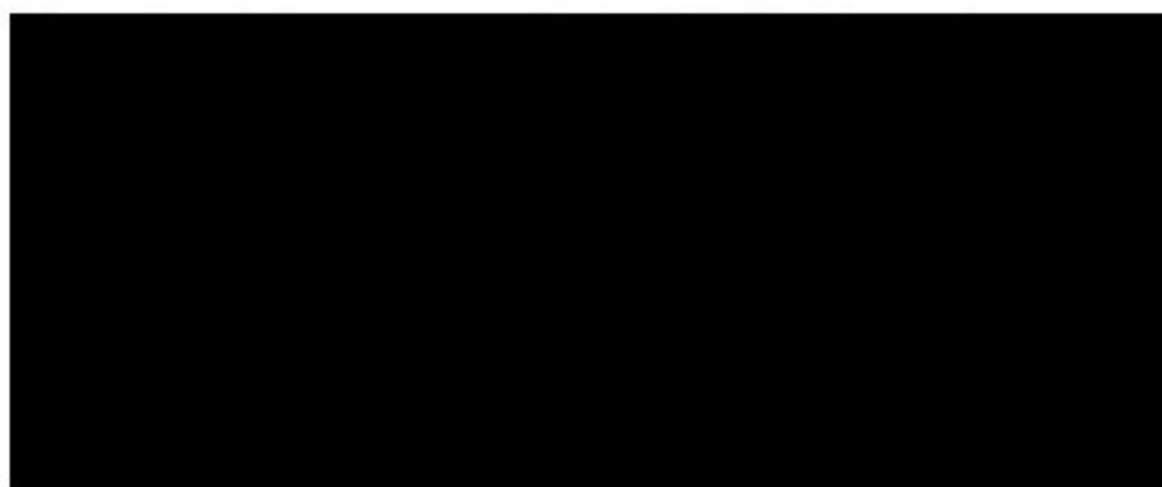
Forename(s): **David Alexander**

Surname: **Watt**

### 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: **Yes**

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

## Site Objections

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

Site reference: **Upper**

Site name: **Site 1**

Comments: **I would like to register my concerns over the proposed local development plan at Knockando (Upper) Site A. My main concerns are:- 1) Worries about what the proposals would be concerning site drainage. 2) Similar worries concerning proposed site septic tanks and soakaways . 3) Concerns over the current state of disrepair of the already over-used single track Knockando School/Church road.**

## Policy Objection

Policy: **DP4 Rural Housing**

Comments:

## Other Objection

Document commenting on: **Proposal for development at Knockando(Upper) Site1**

Comments: **Comments as above**

**other\_obj\_doc\_commenting\_on : as above**

**other\_obj\_comments : as above**

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



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** FR\_OPP7 - 000352  
**Date:** 12 March 2019 21:05:01

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

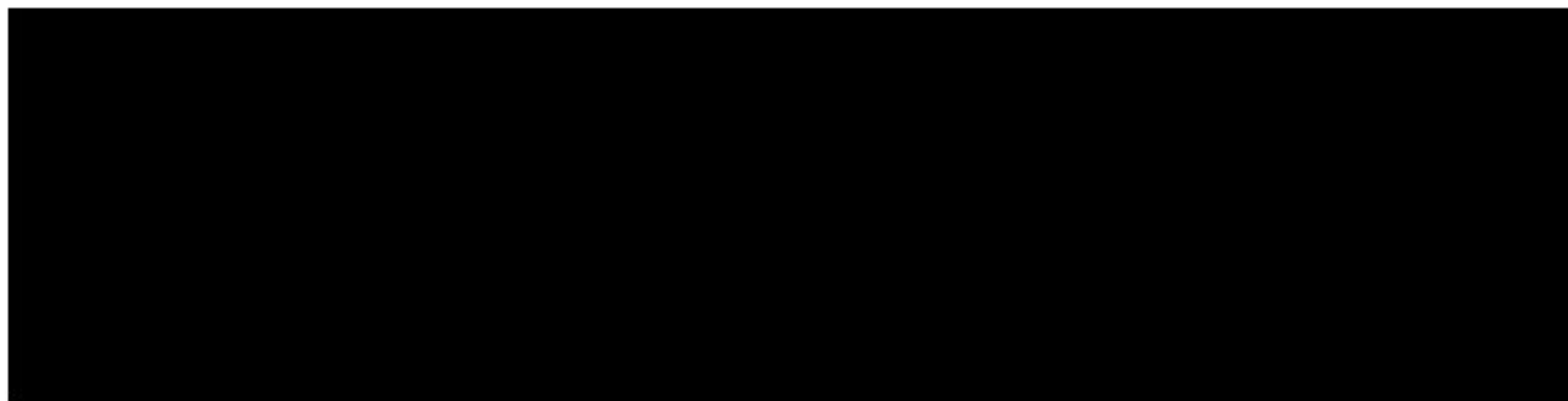
### Your Details

Title: **Mr**

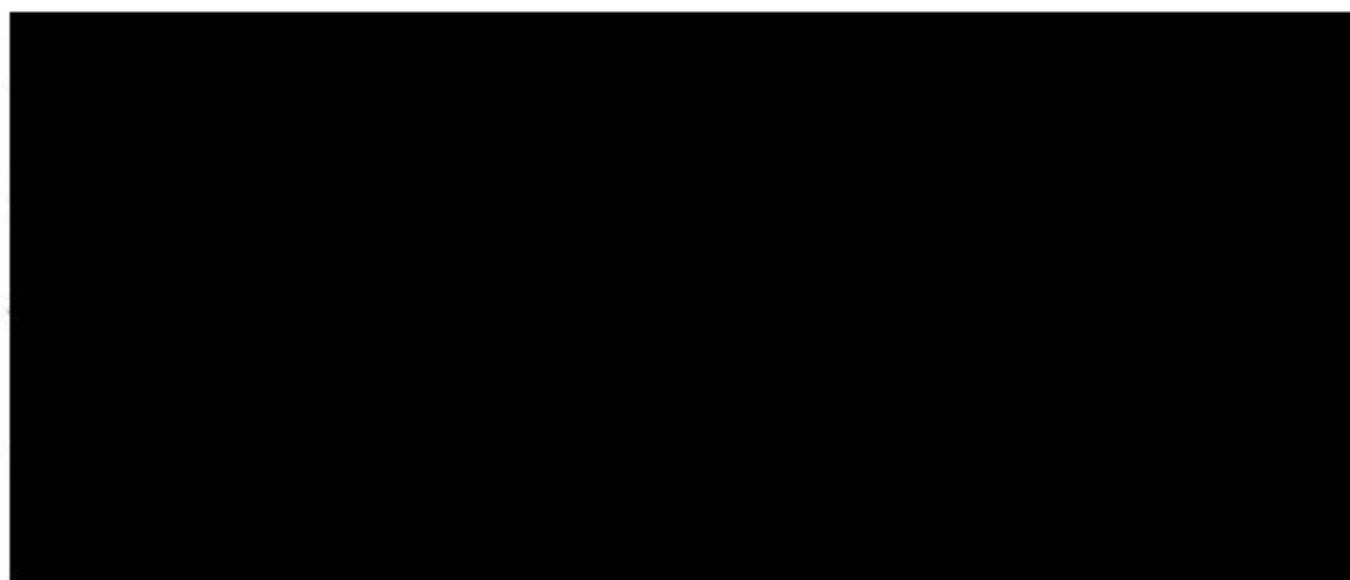
Forename(s): **Raymond**

Surname: **Webber**

### 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: **Forres**

Site reference: **Forres-OPP7**

Site name: **OPP7 Whiterow**

Comments: **I object to this new development proposal because of the lack of road infrastructure and the effect it will have on local drainage. Forres south has been saturated with new developments in recent years and with older sites at Knockomie (R1), Dallas Dhu (R6) and Pilmuir Road West (R7) yet to be started, the last thing the area needs is another new development on the southern edge of the town with no plan to link the area with the A96. The current route uses the Grantown Road and the difficult junctions in Forres or the inappropriate Mundole Road, which also has site R5 waiting to be developed. Surely this is not an option for the future. I am also concerned that the proposed development site water drainage will increase the stream flow adjacent to the U83E. The current agricultural fields around Whiterow do have drainage into the stream which flows along the roadside through the grounds of Plantation Cottage to the Mundole Road and any increase in water drainage will impose a flood risk to the area.**

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

**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002107  
**Date:** 28 February 2019 11:21:38

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

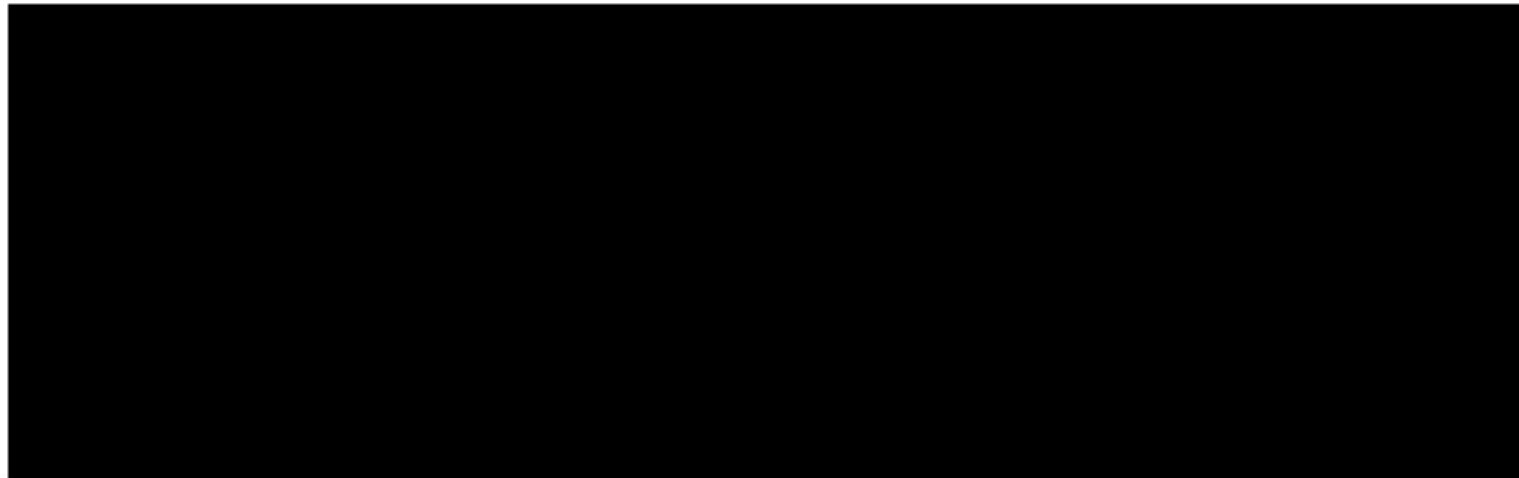
### Your Details

Title: **Mrs**

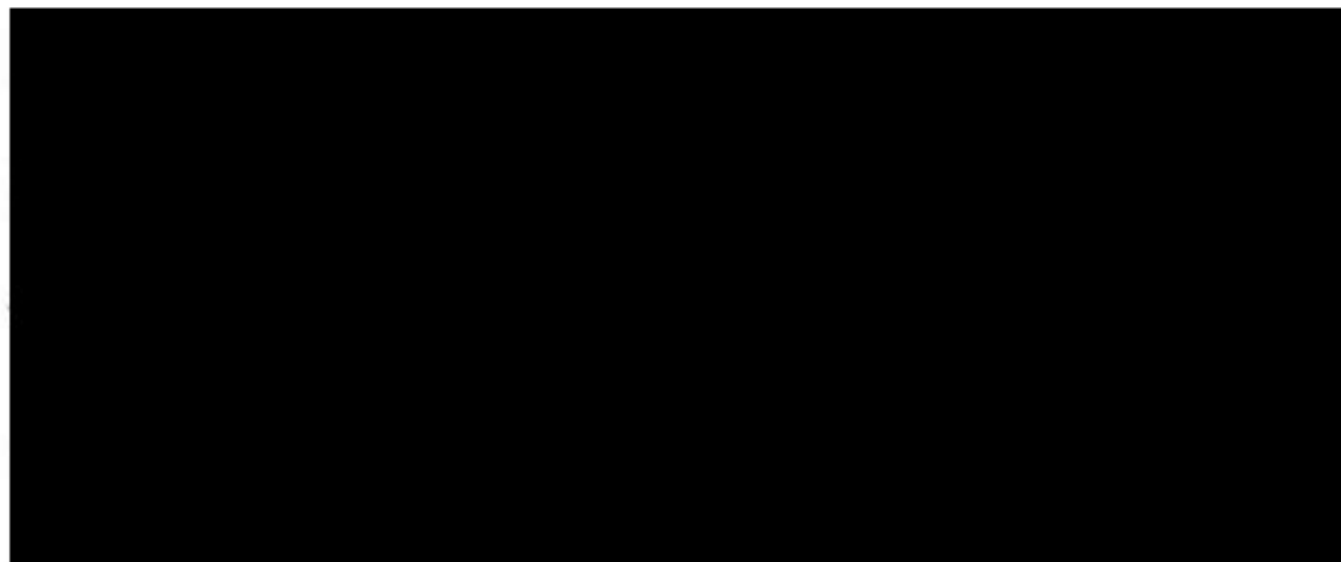
Forename(s): **Valerie**

Surname: **Weston**

### 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**

Site reference: **OP11**

Site name: **Adjacent to Biblical Garden**

Comments: I would like to voice my concerns about the proposed plans to sell off the adjoining land at the Biblical Garden (OPP11). This land is vital for maintaining the garden. How do you propose to keep the garden open without greenhouses, potting sheds, equipment stores and a classroom for the Moray College students who maintain the garden during term time' I am Vice Chair of The Friends of the Biblical Garden. This is a Community Garden for the people of Moray and visitors from around the world. The Friends are a voluntary charity and meet throughout the year. During the summer months we meet every Tuesday evening to maintain the garden while the Moray College Horticultural students are on holiday. There are memorial trees, plants and benches that have been generously donated to commemorate loved ones over the past twenty two years since the garden has been established. It would be a great shame to lose this garden as it brings so much peace and tranquillity to many visitors and volunteers. I object strongly to OPP11 to change the use of the adjoining land adjacent to the Biblical Garden.

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





10th March 2017

Dear Sirs

I am appalled at the Moray Council, and Moray Council Department Service, plans to destroy the invaluable facility of polytunnels adjacent to the Biblical Garden.

The Horticulture Students from Moray College, and Greenfingers training service, which works with adults with learning difficulties, would be left without a base for practical learning facility.

As an ex student, and founder member of Friends of the Biblical Garden, it seems once again. A local Authority Council has made a reckless, and wasteful decision, affecting many people, some of whom are less able to protest.

Please take a look at other options, and I urge you to allow the good work on this sight to continue.

Anne Webberley



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_R1 - 002188  
**Date:** 14 March 2019 17:21:48

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

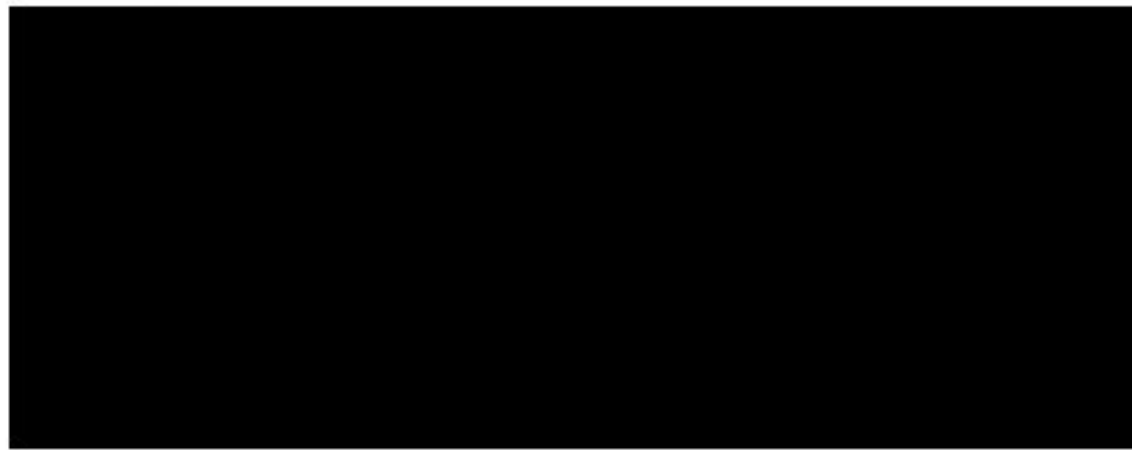
### Your Details

Title: **Mrs**

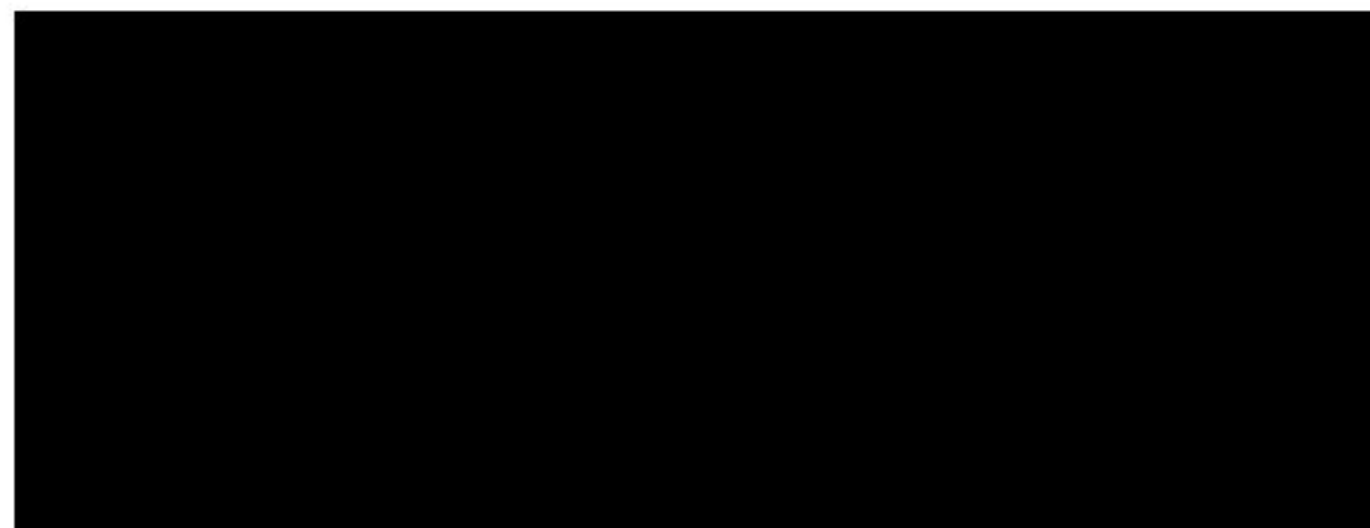
Forename(s): **Joan**

Surname: **Wilcox**

### 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: **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: **Elgin**

Site reference: **181114-Bilbohal -SG-REV J**

Site name: **Bilbohal**

Comments: **On the 20/02/2019 my husband and I attended a consultation for the proposed development of Elgin south {Bilbohall}. To which we object due to the following. Roads/Traffic In the Masterplan at 4.4.6 it states the link road through the core site that connects the Wards road to Edgar road access points, yet we have been informed from the start that there would be no Link road. We are aware of the councils desire to construct a Western Link Road from the previous attempts that was rejected at great cost to the council. The road would be nothing more than a rat run for vehicles coming and going to the A96 thus add to a build up of traffic at the railway bridge and Witted Drive increasing noise and pollution. The increased number of houses now being proposed will add to the problem. Housing We reside at [REDACTED] and looking at the masterplan the bungalows to the rear of our property will overlook our sitting room and kitchen due to the contours of the ground, which will give us little to no privacy. We were informed trees would be planted to rectify this but trees take years to grow and block out the natural sunlight. Elgin council looks for quality of life for resident but this seems not to be the case for Fairfield residents. Deer and other wildlife use the land to the rear our property to gain access and egress from the wetlands and with the construction of the bungalows being built so close the corridor for the wildlife use will be lost. Drainage and Potential flooding. Fairfield Ave is at one of the the lowest points of land in this area, at the consultation there seemed to be very little solution to prevent flooding from run off water, drainage and sewage, Elgin council must take the responsibility should flooding occur in the future due to an adequate system not being in place. We were informed at that some of the run off water would go to the wetlands but during adverse weather conditions the burn at the wetlands has a tendency to flood at Asda roundabout and Edgar road this will only increase the potential of flooding. The Development of the Firs. At present we have no information on what is happening at this site, if it is 2 or 3 story flats or houses therefore we are unable to comment, only the site has protected trees and should remain untouched. Again we would like to state that we object to the proposed site. As it seems the main aims for this development is to create a Link road from Edgar road to Witted drive Yours Mrs & Mr J Wilcox**

## Policy Objection

Policy:

Comments:

## Other Objection



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_R1 - 001879  
**Date:** 14 March 2019 11:26:16

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

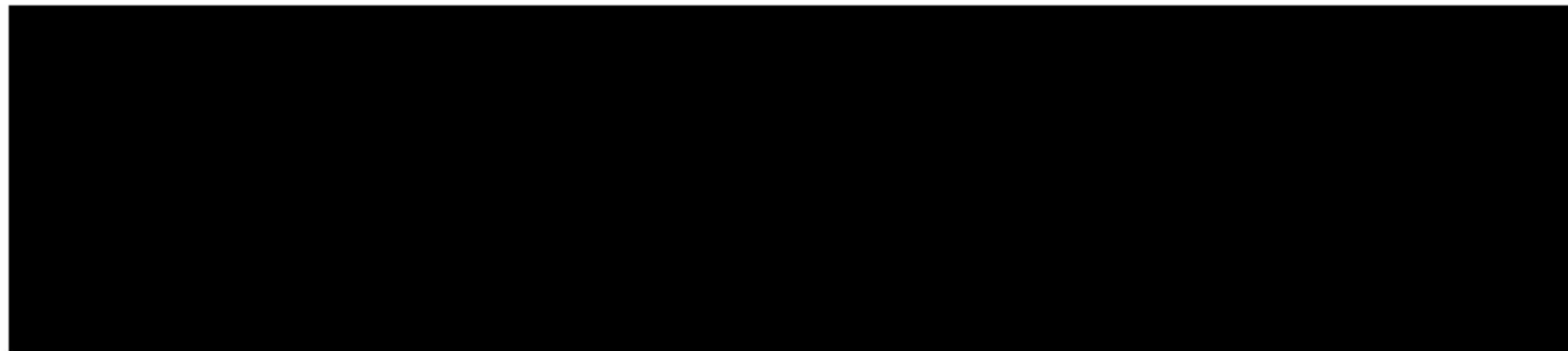
### Your Details

Title: **Mr**

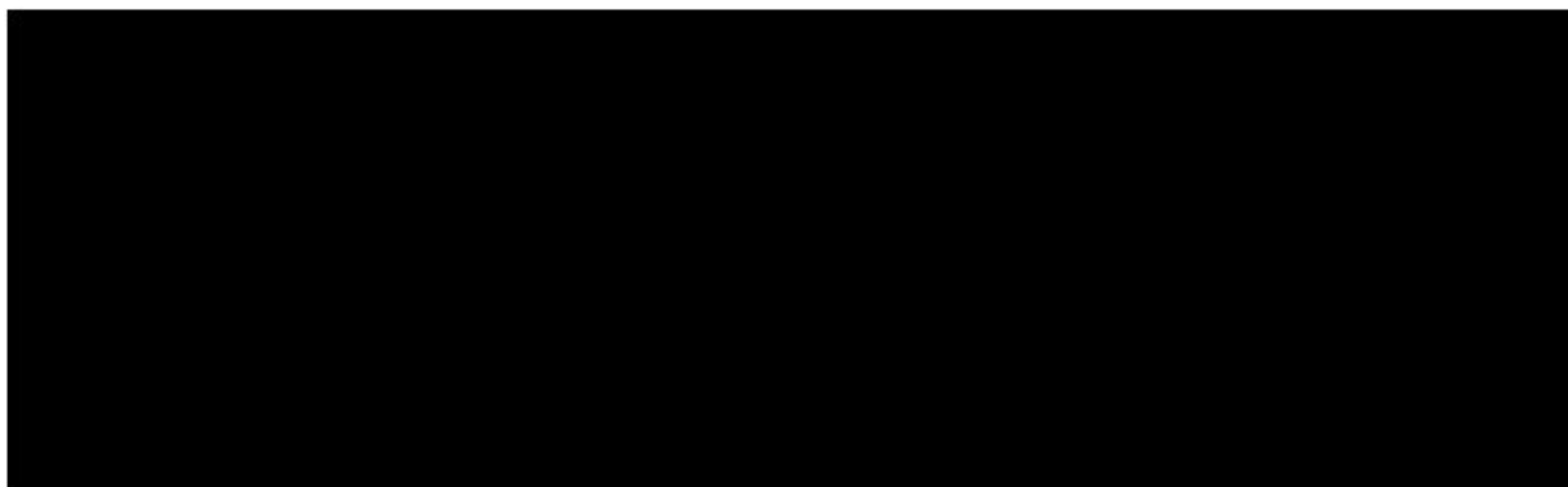
Forename(s): **Malcolm**

Surname: **Wilcox**

### 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: **Yes**

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: **181114-Bilbohal -SG-REV J**

Site name: **Bilbohal**

Comments: **The public consultation at the town hall on the 20.2.19 gave us no further details on our specific concerns than we have had since the start of this proposed plan. There are unresolved issues and your representatives were simply repeating what they had said before the councils master plan had been passed. The "Link" road by default at 4.4.6 referred to in your master plan will be two way traffic across the railway bridge this to include a local bus service. The bungalows to the rear of our house will overlook our sitting room and kitchen this will have a big impact on our privacy, the planting of trees is not the solution as this will restrict the sunlight. There is insufficient distance between our house and the bungalows to allow for the deer and other wildlife to pass to the wetlands , they have been here on this ground for a considerable time. Drainage and potential flooding remain a huge concern with your representative at the consultation claiming this was in place. I would also like to request a detailed report on that or access to it.**

## Other Objection

Document commenting on: **Bilbohal masterplan**

Comments:

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



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** UD\_SITEA - 002184  
**Date:** 14 March 2019 18:24:58

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

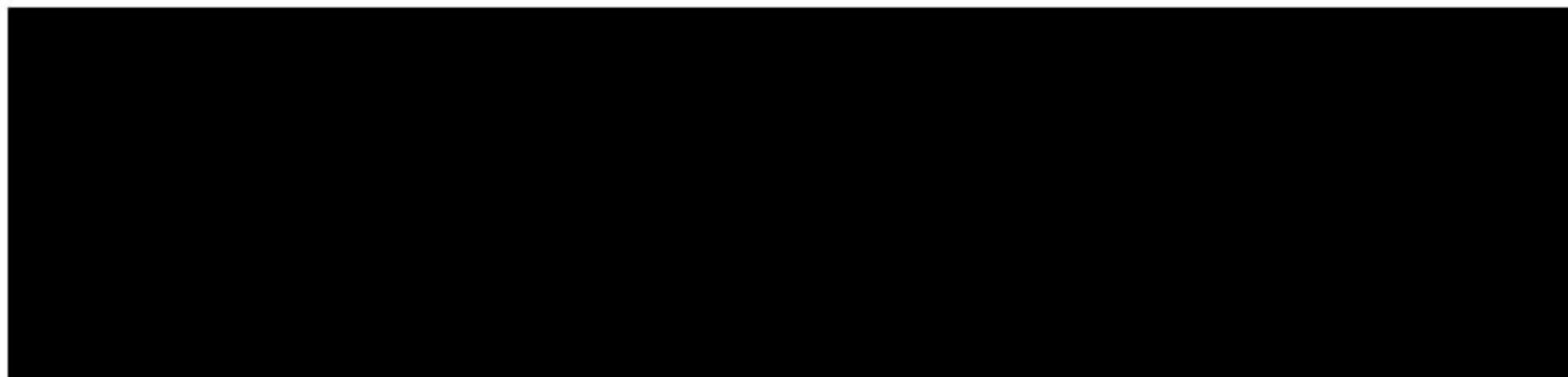
### Your Details

Title: **MRS**

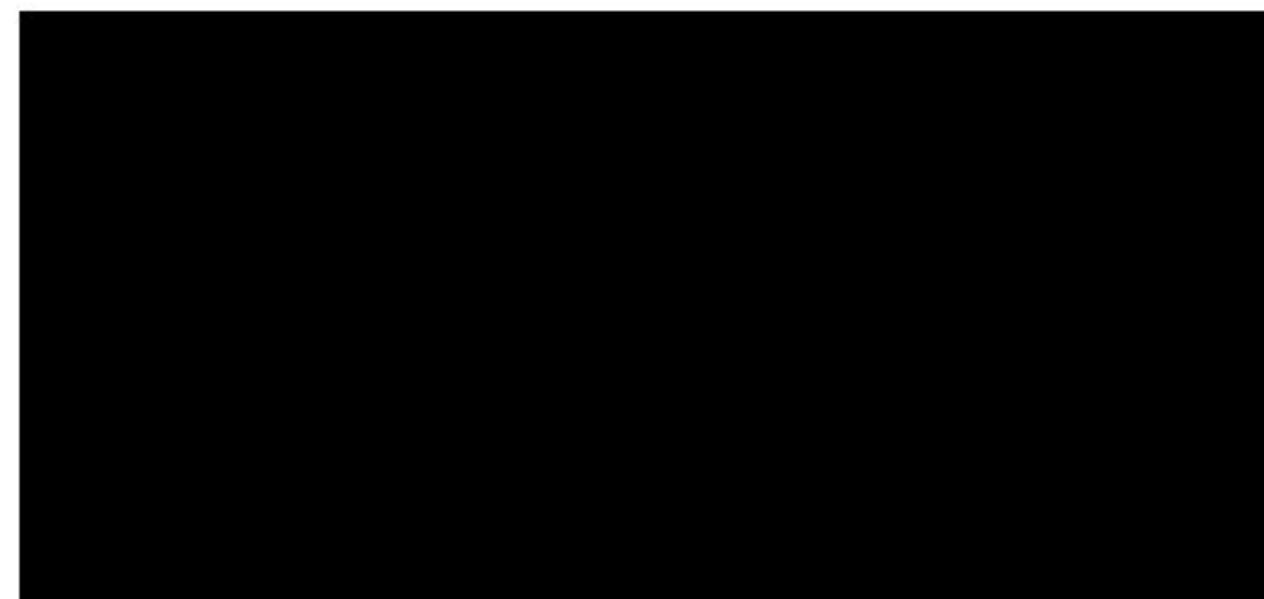
Forename(s): **JANET ANNE**

Surname: **WILKINSON**

### 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: **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: **upper dallachy**

Site reference: **site A**

Site name: **UPPER DALLACHY**

Comments: I am the owner of [REDACTED] my objections to the site A proposal plan are (1) my first concern is after being on low water pressure for many years Scottish Water has only just made our water pressure just above the required pressure therefore any more new properties may effect our water pressure.(2) Concern of soakaways there is only one small field which 3/4 properties already use as their soakaways this field is less than 1 acre in size so adding 4 more houses could cause the field to be flooded or too boggy and could contaminate the burn which the field drains into. (3) Concerns of the banking which is directly below our property and which is the only access road to SEA VIEW COTTAGE any undermining of the banking could cause severe damage to both our properties. There are also trees along the banking which would need to remain and need maintaining who would be responsible for this or liable if any of the trees were to damage our property.

site\_obj\_name\_town\_village\_grouping : UPPER DALLACHY

site\_obj\_reference : Site A

site\_obj\_name : UPPER DALLACHY

site\_obj\_comments : (1) My first concern is after being on a low water pressure for many years Scottish Water has just made our water pressure just above the required pressure therefore any more new properties may effect our water pressure again. (2) Concerns of soakaways there is only one small field which 3 to 4 properties already use as their soakaways this field is less than 1 acre in size so adding more properties could cause the field to flood or be too boggy and could contaminate the burn which the field drains into.(3) Concerns of the banking which is directly below our property and which is the only access road to SEA VIEW COTTAGE any undermining of the banking could cause severe damage to both properties. There are also trees along the banking which need maintaining who would be responsible for this or liable if any of the trees were to damage our property?

## Policy Objection

Policy:

Comments:

## Other Objection

Document commenting on: **7th January 2019**



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002143  
**Date:** 10 March 2019 19:20:39

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

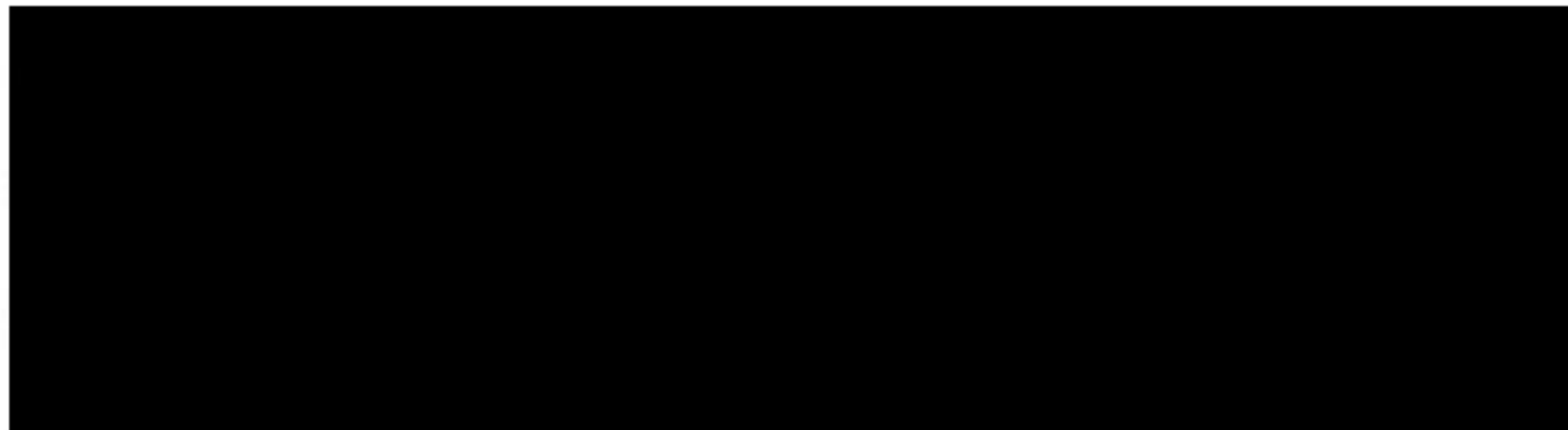
### Your Details

Title: **Miss**

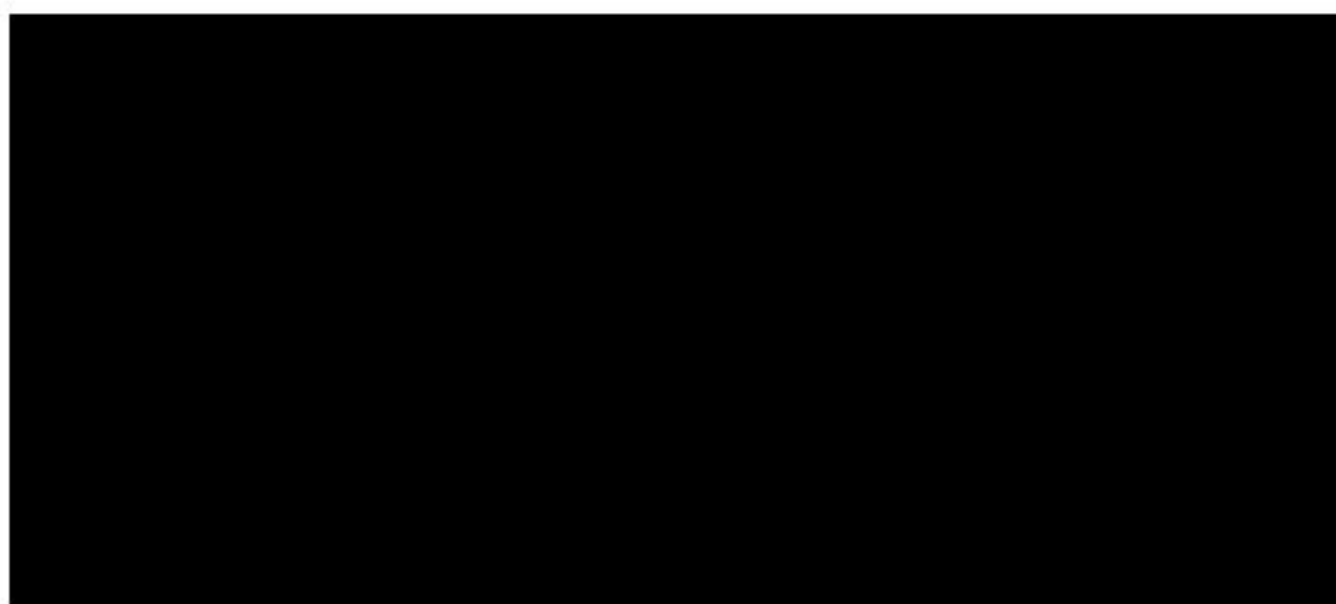
Forename(s): **Tracey**

Surname: **Willetts**

### 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: **OP11**

Site name: **Walled garden**

Comments: I am objecting to the redevelopment of the walled garden in particular the siting of a hotel. I am a local resident and I am aware that the walled garden site is fully utilised by Greenfingers, Reap, Moray College and Lands & Parks. I have read that any access to the site if a hotel is to be built will be via King Street which will presumably mean through the Biblical gardens or next to the Bishops House. Given that 48,000 people visit the Biblical gardens annually and thousands more the Cathedral and Bishops House any access road and/or a hotel would spoil the historic sites. I am objecting to the plans which would see the current users of the site being removed in favour of a private company. In the short term selling the site may generate cash flow for the council but in the long term it would be the hotel owners that would benefit and not the people of Moray. The walled garden is utilised by Greenfingers at present who provide a training service to support individuals who require support to enter the jobs market. They also provide Community Councils in Moray with plants for war memorials and displays to increase the attractiveness of local towns and villages. This service also provides an income. If the service was to be expanded it would not only generate more income but would continually assist trainees get back into the local jobs market. The size of the site they occupy is crucial in that they would be unable to provide plants on the scale they do if relocated. Moray College utilise the site too and maintain the Biblical Gardens. They provide Horticulture training which would be lost to the people of Moray if they were forced to relocate. The question is where they could all be moved to ' Allowing the building of a hotel in the walled garden is not for the benefit of the citizens of Elgin as was the intention of George Cooper when he gifted the grounds.

## Policy Objection

Policy: **Vision**

Comments: **See attached objection**

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



**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002090  
**Date:** 26 February 2019 09:39:31

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

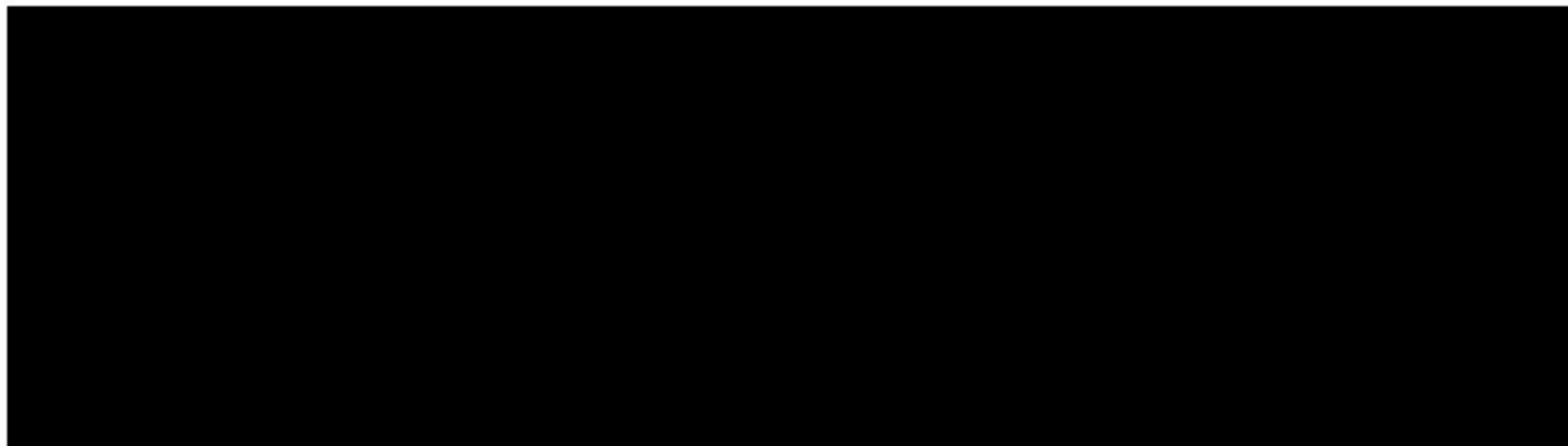
### Your Details

Title: **Mrs**

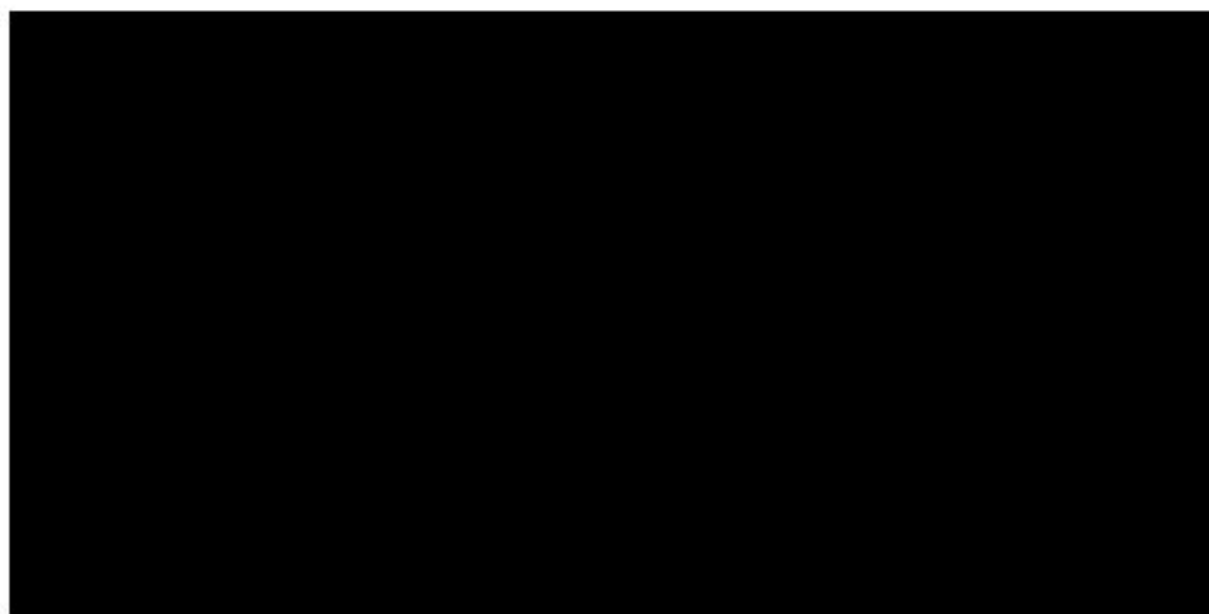
Forename(s): **Lesley**

Surname: **Williamson**

### 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 must object to the proposal to remove the existing Horticulture facility at the Biblical Gardens to allow for the build of a hotel. This would have a huge impact on the popular Curriculum at Moray College, which currently provides essential training to students from all walks of life. A hotel will increase traffic to the peaceful and tranquil area in Central Elgin - often used for mindfulness and relaxation to the public. Traffic is already horrendous around the Pansport to High street link. Do we even need a hotel, when in recent months the Mansion House folded through lack of business' Are we expecting an influx of tourists to visit the non-existing High Street' With the tight council budget struggling to maintain the park - would it not be mutually beneficial to have some areas of the park designated to the horticultural students to care for'**

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

**From:** [eforms@moray.gov.uk](mailto:eforms@moray.gov.uk)  
**To:** [Localdevelopmentplan](#)  
**Subject:** EL\_OPP11 - 002057 - Moray Local Development Plan  
**Date:** 22 February 2019 11:31:17

---

## Moray Local Development Plan - Proposed Plan 2019

Your Place, Your Plan, Your Future

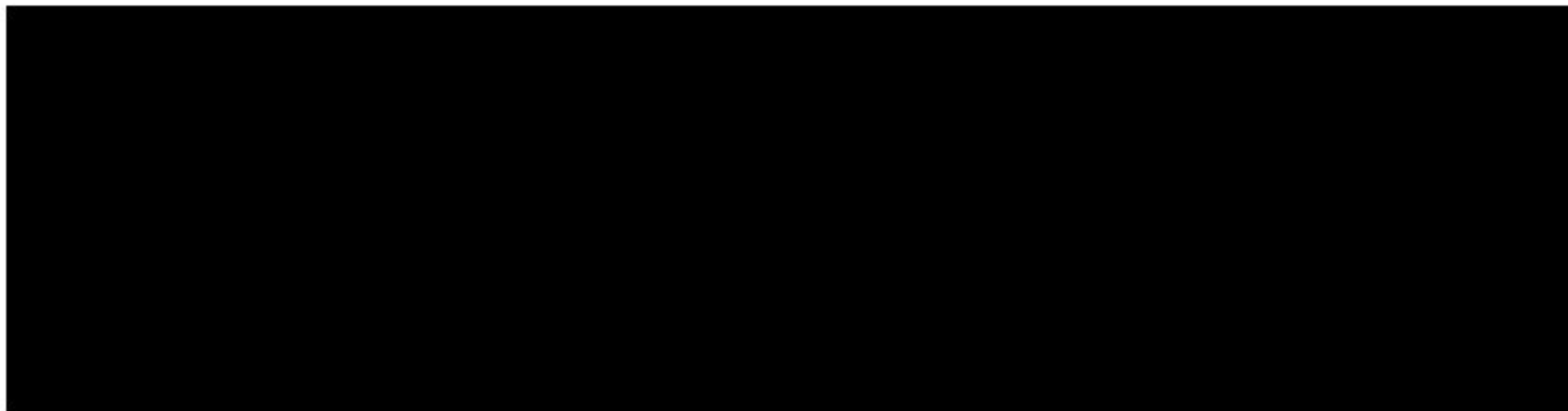
### Your Details

Title: **Mr**

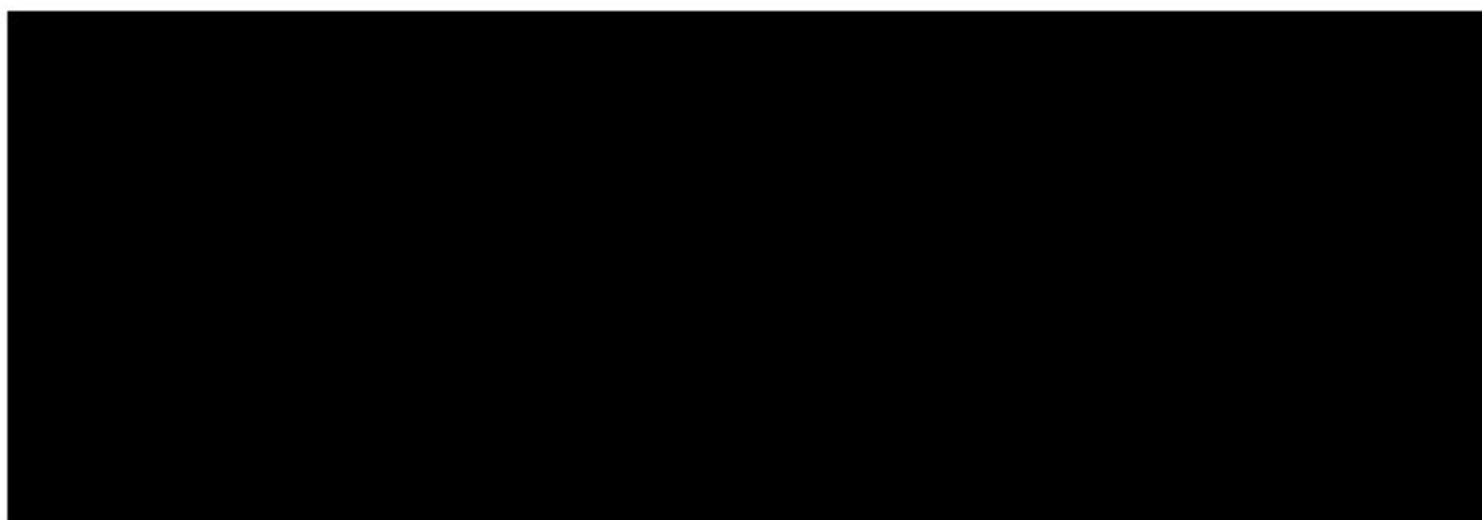
Forename(s): **Joshua**

Surname: **Willis**

### 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 Central**

Site reference: **OPP 11**

Site name: **Walled Garden**

Comments: **Move the site of the proposed hotel elsewhere**

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





Re: OPP11 - The Walled Garden

Dear Moray Council,

I am writing to object to the plan to sell this site adjacent to and integral to the Biblical Garden.

As a former horticultural student I had the privilege to work in this beautiful garden and use the adjacent facilities.

I feel strongly about the value of keeping this facility which is a fantastic resource for the people of Moray.

I appreciate these are difficult times and savings have to be made but I feel this would result in the decline of our beautiful Biblical Garden which is popular with locals and many visitors from all over the world. It's part of our local heritage and should be protected for future generations to enjoy.

It would also affect other users of the site who have vulnerable clients who gain so much from horticultural therapy.

Please reconsider.

I fully support the review of the schools estate and merging of small schools / rezoning etc to make savings as I think that would benefit the quality of teaching available as well as be a saving.

Yours sincerely

Amanda Willox



# grant and geoghegan

planning · development and architectural consultants

Development Plans Team  
Environmental Services Department  
The Moray Council  
Council Office  
High Street  
ELGIN  
IV30 1BX

13 March 2019

Dear Sir/ Madam

## **Moray Local Development Plan – Proposed Plan DP4 Rural Housing - Representation**

In general, we are of the opinion that there are several areas within the proposed rural housing policy which could be refined but that ultimately, most of the policy is workable.

The exception to this is the prescription, set out in the siting criteria of the 'New Houses in the Open Countryside' section of DP4, for 75% enclosure, containment and backdrop made up of existing landform, mature trees, established woodland or buildings. We object in the strongest possible terms to its inclusion in the final version of the Local Development Plan and respectfully request that the percentage is reduced to 50%, as is prescribed in policy H7 of the outgoing LDP.

Based on our extensive experience working on housing projects in the Moray countryside, we need to highlight that the prescribed 25% increase in boundary treatment inadvertently wipes out the potential for any new housing in the Moray countryside (except in the rarest circumstances) and we would contend that this requirement transposed into planning policy serves no purpose in promoting good siting over and above what the current 50% boundary enclosure criterion can achieve.

It is important that the aim behind the policy is considered in the context of the outgoing LDP and the inevitable outcome- if the aim is to ensure a building has sufficient backdrop or enclosure and guard against inappropriate development in the countryside then the current policy approach has proven to be sufficient in the preceding Plan period. In our previous response to the Main Issues Report we set out several illustrations of extremely well defined properties in the Moray countryside which would fail the proposed policy test.

If the aim of this policy is to eliminate the possibility of any new Housing in the Moray Countryside over the next Plan period then we contend that it should not be accomplished through the prescription of an unachievable policy test. Such an approach is clearly at odds with the spirit of SPP, NPF3 and the aims and objectives of the Proposed Plan itself. In its current form, this aspect of the Rural Housing policy is unnecessarily restrictive and detracts from the ability of decision makers to make assessments based on the individual merits of an application.

We need to make clear that in practice, the amendment of this single aspect of the Proposed Plan would only be sufficient to enable some limited residential development in the countryside and cannot reasonably be expected to give rise to unsustainable growth and suburbanisation of the countryside. On this basis, we are proposing a compromise i.e. the prescription of 50% enclosure, containment and backdrop made up of existing landform, mature trees, established woodland or buildings.

An example of what an amended policy approach would look like is appended to this response. The removal of field drains, ditches, burns and wire fencing, roads and tracks as suitable boundary treatments should serve to remove any prospect of housing coming forward which is poorly sited but meets the minimum requirements of the policy. The proposed compromise will allow for a limited amount of well sited, residential development in the countryside which we feel is the most sustainable approach and what the Council is aiming for.

For the reasons given, we would respectfully ask that the economic and social benefits associated with a limited amount of well sited residential development in the countryside amounting to proportionate growth over the next Plan period is given sufficient weight in the plan making process and that the proposed amendment is made to the Rural Housing Policy.

We would welcome an opportunity to come in and discuss this in more detail.

Kind regards,

Neil Grant  
grant and geoghegan



RECEIVED

26 FEB 2019

15/2/2019

To whom it may concern,

I refer to the shaded area denoted RI on proposal plan, designated for 50 proposed houses.

1 – The area marked RI Seabraes will prevent lots of wildlife such as deer, pheasants, rabbits etc who all habitat and enjoy the freedom of this area.

2 – Also, and more importantly, are the skylarks who nest in this area, which is one of the few areas they seem to frequent.

3 – The additional 50 houses will no doubt bring more families to the area, which will increase the number of pupils attending an already reportedly overcrowded Primary school.

4 – The proposed plans show 1 of the 2 access points from Addison Street, which is a costal path used each day for the many visitors who frequent this area, and who wish to make the walk from Portnockie to Cullen beach. This will be very much restricted due to heavy construction vehicles frequenting the area. This will no doubt have an impact on tourism in the area.

5 – Also do you think the roads will withstand all this heavy construction vehicles and increased traffic?

6 – I also noticed on the proposed plans Development Brief 1 & 2, that vehicle access was going via Wood Place which is in close proximity to the local children's playpark – would this not be terribly dangerous for all the local children that frequent the play park and for visiting children from outwith?

7 – If these houses were built, and families were to move in with teenage children or young adults, knowing there is nothing to do for people of that age range, I fear this would cause disturbances and antisocial behaviour.

These are my reasons for objecting to the proposed plans for 50 houses being built on site RI.

I look forward to hearing back from you.



Local Development Plan Team  
Development Management  
Environmental Services  
The Moray Council  
High Street Elgin  
IV30 1BX

Berrybauds, Clochan  
Buckie AB56 5HX

Tel/Fax: 01542 850336  
info@jws-design.co.uk  
www.jws-design.co.uk

Date: 15<sup>th</sup> March 2019

Dear Sir/Madam,

**PROJECT: LOCAL PLAN BID PROPOSAL FOR NEW RESIDENTIAL HOUSE SITES  
ON GROUND ADJACENT TO COUNTY HOUSES NEWLANDS OF EASTERTON REF:  
LDP2020\_BID\_BI12 OF MLDP2020 PROPOSED PLAN VOL3 BURNIE**

Further to our meeting this afternoon with Emma Gordon, Gary Templeton, Mike Woodcock, James Woodcock and myself at The Moray Council offices and as discussed please find the accompanying amended proposals pdf titled Birnie\_6\_Plot\_Option\_13 for the 6 house plots at the above. 5 house plots are shown as being retained on the applicant owned ground opposite to the Birnie Inn. These 5 sites lie out-with the flood extent zone set out within Kaya Consulting's FRA and make good use of this section of ground.

The above statement relates to the previously emailed comments made by Mike Woodcock:

1. *"Obviously we are disappointed, particularly as we had spent so much on the two flood risk assessments by consultants and further professional fees. As you know these assessments led us to propose five sites opposite to the Birnie Inn and confirmed that all of the proposed sites to the East of the County Houses have no flood risk. We do not understand why you are now cutting the five sites opposite the Birnie Inn to a possible three with smaller gardens and have not included any of the sites to the East of the County Houses. This will make the three sites now proposed opposite the Birnie Inn very expensive given the high costs to date and the works required to prepare the sites. Removing all of the sites to the East of the County Houses which are nearer to services and easier to develop leaving just three of the most expensive sites to develop will make the project marginal.*

*If, however, you remain opposed to anything like the size of development which we have proposed, could we please ask you to consider the following alternatives.*

- (a) *That the Southern development line on the opposite side of the road to the Birnie Inn at least includes the five sites that we have proposed. This would utilise for housing the land between the road and Foths Burn which does not have a flood risk rather than wasting it, leaving the flood risk land as amenity ground. It would also mean that we do not have to squeeze three houses into a space which we intended for just over two. It would also make development here more viable and provide houses and with larger gardens"*

We trust that this information will assist you in your assessment of our proposals and will enable you to alter the Birnie Settlement map on page 8 of the MLDP 2020 Proposed Plan Volume 3 document page 8 to now include the entire 6 plots.

We understand that we are close to the deadline and we thank you for your time and advice today.

  
Of JWS Design Ltd on behalf of Mike Woodcock (client / applicant)



**Woodland Trust Scotland response to Moray Proposed Local Development Plan 2, March 2019**

**Response sent via consultation form: [https://online.moray.gov.uk/form/auto/mldp\\_proposed\\_plan](https://online.moray.gov.uk/form/auto/mldp_proposed_plan)**

Woodland Trust Scotland (WTS) welcome the opportunity to give our views on the Moray Proposed Local Development Plan 2 (PLDP2). We also made a representation to the Moray Main Issues Report in April 2018.

The comments that follow are delivered on behalf of the United Kingdom's leading woodland conservation charity. We have three main aims:

- Ensuring no further loss of ancient woodland
- Restoring and improving woodland biodiversity
- Increasing new native woodland creation

We own over 1,000 sites across the UK, covering approximately 26,000 hectares (ha). In Scotland we own and care for around 60 sites covering in excess of 9,500ha which include the 5,000ha Glen Finglas estate and significant urban forestry holdings in Glenrothes and Livingston. We combine the promotion of public access with forestry, farming and conservation of the natural and cultural heritage. The Woodland Trust has 500,000 members and supporters.

For the purpose of this consultation we looked at the policy section, and the site allocations, focusing mainly on the impact of these on woodland present on the Ancient Woodland Inventory (AWI).

We consider that any woodland present on SNH's AWI is of high value for nature conservation and therefore worthy of further study, and likely to pose constraints on development. Our comments are below.

**Placemaking policies**

PP1 Placemaking: (iv) open spaces/ landscaping - good that it mentions a connected network of green and blue infrastructure, tree planting as part of landscaping and most importantly maintenance arrangements of these spaces. We note that these provisions have been included as part of site allocations and masterplans in the settlements section.

On page 50 in relation to 'Landscaping', we welcome the addition that '15% Native tree planting must be provided to help integrate a new house into the landscape setting.' WTS believes that this provision could be improved by adding the wording 'At least 15% native tree planting [...].' We are unsure of how the figure of 15% was decided upon, and if the percentage is from the total of the trees to be planted, or the percentage of the land use to be occupied by trees. This should be clarified in the final LDP2.

**EP2 Biodiversity**

This is a very good policy and we generally welcome this, with the exception of the provision on compensatory measures which should be worded to exclude irreplaceable habitats such as ancient woodland. Add '*In the case of irreplaceable habitats, such as ancient woodland, no amount of compensation can make up for loss, therefore, development likely to impact on such sites should be located away from these areas.*'

### **EP5 Open Space**

This is a fantastic policy and we welcome that the local authority is considerate of these important provisions in relation to development. Such provisions will deliver an outstanding environment for biodiversity provision as well as for society, and in turn support the local economy.

To change/ include: The Scottish Government launched a new Scottish Forestry Strategy on 4th Feb 2019 and this has a commitment to encourage the increase in tree canopy cover across our towns and cities. This Open Space policy could include a provision to increase tree canopy cover across Moray's towns, as part of this policy. The benefits offered by urban forestry, which includes trees in parks, cemeteries, streets, are now well recognised.

The diagrams should be referenced in the policy text, or in the justification/notes section.

In *ii) Quality Standard - Biodiverse supporting ecological networks* we are unsure at what point the assessment will be made to see if the development meets the criteria set out here, and how will failure to meet the assessment criteria by at least 75% compliance be addressed.

### **EP7 Forestry, Woodlands and Trees**

We welcome and support the provisions in this policy, but have some suggestions to improve this below.

It is recognised that the AWI is incomplete and flawed. This is especially true in certain local authority areas such as the Scottish Borders. There may be area of ancient woodland which have been completely missed off the inventory, or which are shown in the wrong location. Stating in this policy 'removal of woodlands which appear on the AWI will not be supported' is restrictive in the sense that it does not offer protection for ancient woodland areas which have not been included in the inventory. We recommend just referring to ancient woodland instead. Where it is suspected that certain woodland areas could be ancient, the first step should be returning to the first Ordnance Survey from the 1860s and/or a survey should be conducted to determine the value of the woodland. Since this proposed plan was published, the Scottish Government has published its new Scottish Forestry Strategy 2019-29 which states that unnecessary loss of ancient woodland should be avoided; this policy should be updated to reflect this.

After identifying some site allocations which are adjacent to areas of woodland shown on the Ancient Woodland Inventory we have some recommendations to make in relation to the addition of a requirement in this policy to buffer areas of woodland to minimise negative edge effects from development. We note that in some cases the site allocations are right up to the edge of woodland areas which appear on the Ancient Woodland Inventory. We have provided comment separately in the site allocations comments section on these, but would recommend that as part of this policy, the wording 'where development is likely to cause damage to an area of ancient woodland, the development should be located away from this area, ensuring that appropriate buffer areas are left between the woodland edge and the development boundary.' In some cases this reinforcement planting has been specified as part of the site requirements but this is not consistent. These cases which we have identified are: R4, R5, R12, I16, LONG 3 in Elgin, and LONG 2 in Mosstodloch, and we welcome that landscaped edges, additional reinforcement and screen planting have been listed as part of the site requirements.

To ensure that any biosecurity concerns are minimised, there should be a requirement to plant only trees which have been sourced and grown in the UK. The Woodland Trust is delighted to see that native tree planting is specifically mentioned as the recommended planting in new developments. This is further stated in the introduction to the settlement statements. However, we note that ash was added as one of the



recommended species and we want to bring to the Council's attention that due to ash dieback disease there is a moratorium on planting ash trees. In the final version of the plan please leave out mention of ash trees.

**c. Trees and Tree Preservation Orders:** We welcome the requirements for tree management in Conservation Areas, and for trees felled within these areas, or subject to a TPO to be replaced.

We note that many of the new developments have site-specific requirements to plant mature trees, or feature tree planting, or retain existing trees, woodland and hedgerows. This is very much welcomed as trees play an important part in ensuring a smooth transition between the built and natural environment, they can provide habitat for wildlife, shade, water runoff mitigation, to name a few of the benefits of trees within built environments. The Woodland Trust has published guidance on residential developments and trees which can be found here: <https://www.woodlandtrust.org.uk/mediafile/100824549/residential-developments-and-trees-12789.pdf?cb=ba134ec6c6b14702aab71e08051def86>.

### **Overall comments on site allocations**

Generally we are pleased with these and we haven't identified any instances which could cause direct loss to woodland present on the Ancient Woodland Inventory (AWI), or on the Native Woodland Survey for Scotland. We have identified instances where at the moment it looks like the site allocation is adjacent to areas of woodland present on the AWI. We have listed these below. Development adjacent to areas of ancient woodland can have negative edge effects such as:

- Chemical effects through acidification, eutrophication and toxic pollution
- Disturbance by noise, light, trampling and other human activity
- Fragmentation as a result of the destruction of adjacent semi-natural habitats
- Provides a source of non-native plants and aids their colonisation
- The cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation.

Development cannot only harm woodland when felling is required but development in close proximity to ancient woodland can be just as damaging. This fact is also recognised in Scottish Planning Policy which states that not only should ancient woodland, as well as woodland of high nature conservation value be protected from felling but *'should be protected from adverse impacts resulting from development.'*

We welcome how the site-specific developer requirements are listed with each site allocation, and also the clarity of the PLDP2 layout with each site allocation identified separately, and then on the full settlement maps. There are some general comments we can make in relation to these.

- We welcome instances where existing trees and woodland on site are to be retained and protected
- We welcome instances where buffer areas of additional planting are required
- We welcome instances where trees are required as part of green infrastructure
- We suggest that where there is ancient woodland that this is also identified as such in the site specific developer requirements for clarity and to raise awareness of the existence of this abutting the site
- The instances where additional woodland buffer areas should be consistent and apply to all ancient woodland.

In the table in Annex 1 below we list the sites we have identified where there could be damage to or direct loss of woodland present on the AWI.

## Annex 1: Site allocations assessments

Site reference, name and use	Description of woodland and recommendation
Elgin: R11 Findrassie. Residential 1500 units	The North West of the development is adjacent to an area of LEPO woodland, Findrassie Wood, 90 ha, NJ206646. There is no specific mention of a buffer between the existing woodland and the development in the text but the Findrassie Masterplan does appear to show an area of planting between the development and the woodland edge. The appropriate size and type of buffer can be advised on at planning application stage. The site requirements should be more specific about buffer woodland creation.
Elgin: R 19 Easter Linkwood and Linkwood, Residential 675 units	There is a narrow strip of LEPO along the Linkwood Road near the Southern end of the site, NJ234609. This forms a corridor to a larger area of LEPO woodland, Birkenhill Wood, approx. 36 ha in total. This is the same woodland which is adjacent to site allocation LONG2 Elgin South. The development area should be designed to retain any existing trees. In addition, a buffer between the area of woodland and the development should be recommended by the planning authority as a site specific requirement. The appropriate size and type of buffer can be advised on at planning application stage. We note from the Elgin South Masterplan on page 171 that the woodland areas are to be retained. This is positive, but should be clearly stated in the site specific requirements. The woodland areas could also be surveyed to assess their ecological value and a management plan and buffer areas can be further informed by this. The site development is likely to increase recreational use, which is encouraged, however paths within the woodland should not result in felling and be designed to ensure they are followed to avoid creation of desire lines and damage to ground flora. These comments are valid for site allocation LONG 2 Elgin South.
Elgin: Long 2 Elgin South, Residential	A significant part of the Southern Boundary of the site borders on to an area of LEPO, Birkenhill Wood, 36 ha, NJ227603. In the first instance a buffer between the area of woodland and the development should be recommended by the planning authority as a site specific requirement. The appropriate size and type of buffer can be advised on at planning application stage. Our comments for R19 are also valid for this allocation.
Elgin MU1 Riverview, Business, hotel & residential	The Western boundary of the development area is adjacent to a large area of LEPO woodland, Quarrel Wood, 400 ha. In the first instance a buffer between the area of woodland and the development should be recommended by the planning authority as a site specific requirement. The appropriate size and type of buffer can be advised on at planning application stage. The site specific requirements should recognise that this woodland is on the AWI to help inform the developer of the constraints this may pose.

Fochabers T1, Caravan Site. Burnside Caravan Park – existing caravan park on site already	Woodland to West of the burn (and incorporating a part of) the caravan site is AWI LEPO, NJ351579, and fundamentally connects Slorach's wood into and through the town to the riparian woodland of the Spey. This woodland and the continuing riparian woodland through the town appear on 1843-1882 OS historic maps. The site allocation boundary includes this LEPO woodland (approx. 1.4ha) as well as other newer woodland, which if developed would sever the connection between the two areas of woodland. The connected woodland affected by fragmentation is too large to measure. The WT objects to the inclusion of the LEPO to the west of the site within the site allocation unless there are clear site specific requirements that this woodland is not to be lost and is required to be managed. Buffers appropriate to the scale of development (caravans and roads) should be required.
Forres R2, Ferrylea, Residential 380 units	The southern part of this site is adjacent to an area identified as LEPO on the AWI, NJ030569. The WT recommends a site-specific requirement of a significant buffer to protect the woodland. The site development is likely to increase recreational use, which is encouraged, however paths within the woodland should not result in felling and be designed to ensure they are followed to avoid creation of desire lines and damage to ground flora.
Forres Long 1, Lochyhill, 19ha	We have identified the woodland area on this site on the 1st Edition OS 1874 maps, and recommend that it is assessed for its ancient woodland value. It is known that the AWI is incomplete and that smaller woodlands were left off the Inventory altogether, therefore it is worth surveying this area with a view to ensure its retention and appropriate management.
Forres OPP7, Whiterow, 13ha residential and/or small business	On this site we have identified LEPO woodland at NJ025569. This is the same woodland adjacent to Long 1 above. The indicative drawing for this site at p 212 appears to show a complete loss of the woodland. Introduce change in site drawing (figure 1.5) to recognise the importance of this remaining woodland and request retention and appropriate buffers in site requirements.
Kinloss R1, West of Seapark House	This site contains mature trees, shown on 1st edition OS maps and some of the oldest trees in Kinloss, protected by TPO since 2009 for their biodiversity value with recognition of the site for housing to be sensitively integrated into the site. It is recognised that houses are to be located in clearings, and tree removal avoided, with a tree protection plan required. The best protection for these trees would be to avoid development on this site altogether. If unavoidable the indicative site area shown on p 264 could be amended to clearly show where the housing would be appropriate taking into account root protection areas.
Rafford R1, Brochloch, Residential 12 units	Abuts 48ha LEPO to west at NJ066555. Looks like nice open conifer but we are uncertain of the nature conservation value of this LEPO and would recommend a survey to assess any ancient woodland features which may be present. Based on these findings an appropriate buffer and further management can be recommended.

Contact details:

Arina Nagy-Vizitiu, Public Affairs Officer

E: [ScottishCampaigns@woodlandtrust.org.uk](mailto:ScottishCampaigns@woodlandtrust.org.uk)

T: 01738 635 829 | Direct line: 0343 770 5580

Edinburgh office address: Studio 3, 10 Queensferry St, EH2 4PG



## **Bilbohall Development**

Having attended the public consultation on the 20<sup>th</sup> of February 2019, I still have great concerns over the volume of houses proposed and the increase of traffic in and around the Bilbohall area.

I am rather concerned that less than 2 years ago Moray Council were planning a link road from Wittet Drive across to New Elgin which would provide access to the proposed houses outlined in the Bilbohall Masterplan but the link road was abolished, but no other means of access from the West End of Elgin has been outlined on the plans. Wittet drive could see an increase of over 400 more cars per day. Currently the volume of traffic in and around the Bilbohall area is already extremely high and the road and bridge in and out of Fairfield Avenue, Fairfield Way and Mayne Farm is not sufficient enough for any more traffic. The current bridge that is in place is not wide enough for 2 cars and visibility is very restricted when turning right onto Wards road and then turning right after Wards road onto Wittet drive. I feel Fleurs Road, Wards road and Mayne road would be completely unsuitable for the proposed bus route outlined on the plans.

The Bilbohall area is currently a very popular area for walking for many members of the public, myself and many other local residents would be greatly saddened to see this ruined by the proposed development due to a dramatic increase in traffic, noise, pollution and dust. The area also attracts a lot of wildlife which would also be affected by the development. The Bilbohall countryside area is one of very few areas left in Elgin and it would be great shame to see this also turned into yet again another large housing development.

I also feel Elgin does not have the resources for potentially an additional 1000 residents. We already currently have a large waiting list for dental and doctor appointments, we have a serve lack of sport and leisure facilities and very poor choices of shops. The current volume of traffic through Elgin is also very high and would increase dramatically by the development.

I currently reside at [REDACTED] the proposed houses will run parallel to Fairfield Avenue, the plans outline that the proposed houses will be built on the steep incline behind Fairfield Avenue meaning the residents living here will be overlooked by the new proposed houses, therefore myself and my neighbours will lose all privacy that we currently have. I feel it would be disgraceful if the council think that it would be acceptable to build houses so close to the houses on Fairfield Avenue that were built over 10 years ago and bought on the basis that they would have complete privacy behind their homes. We currently have some trees behind our houses but not enough to screen and provide privacy from the proposed new homes, the latest plans outlined that more trees would be planted, but this will still not provide enough screen. The Fairfield Avenue area is currently extremely well looked after by the residents that live here and I have concerns over the increase of litter and vandalism the new development of houses may bring. I would like to see the houses that back onto any houses in Fairfield Avenue and Fairfield Way abolished from the plans. The plans seem to indicate there's space elsewhere on the development where these houses could be built without affecting any current residents of the area. The Bilbohall development would have a detrimental impact on all the residents currently living in the West End of Elgin.

Many thanks

Sofie Wright, [REDACTED]