

RESPONSE TO FURTHER REPRESENTATIONS

Planning Application 25/00549/APP

Date: 14 November 2025

Dear Ms Rowman,

1. Thank you for the opportunity to respond to the further representations submitted.
2. I address each of the points raised in turn below. For clarity, I have grouped the matters thematically.

Noise Concerns

3. Several contributors state concerns about cats “meowing at night” and general noise nuisance.
4. Facts on the record:
 - a. Environmental Health were formally consulted and raised *no objection*.
 - b. They specifically concluded that the proposal presented no noise concerns and did *not* require a Noise Impact Assessment.
 - c. All cats are housed indoors, in fully insulated suites, with no outdoor runs.
 - d. The building is specifically designed to exceed CIEH acoustic insulation standards.
 - e. Cats in a boarding environment do not roam, call, or interact with other cats as they might outdoors; they are kept individually in controlled, quiet suites.
5. The concern is therefore speculative and unsupported by any technical evidence, whereas the professional consultee advice confirms that noise will not be an issue.

“Busy Metropolis” / Local Context and Business List

6. One representation suggests our supporting statement “misrepresented” Garmouth.
7. To clarify:
 - a. The supporting statement does not describe Garmouth as “busy”, and certainly not as a metropolis.

- b. The point made was simply that the wider area contains a mix of residential, tourism, and home-based business uses, consistent with small rural villages.
 - c. Where examples were provided, businesses in Fochabers were included only because representors repeatedly referred to Fochabers and Garmouth interchangeably in their own objections.
- 8. The intention was not to misdescribe the village, but to demonstrate that small-scale commercial activity is not unusual in this rural locality, which is materially relevant under NPF4 Policy 26.
- 9. If any entry in that list falls outside Garmouth, this is immaterial: the principle being illustrated remains valid—that low-intensity home-based businesses of various kinds already operate in the area and do so without undue impact.

Deliveries and Waste Collection

- 10. Representations raise two related concerns: that deliveries will occur and that waste collection will add traffic.

Deliveries

- 11. The operation does not receive commercial deliveries. All consumables (cat litter, cleaning products, food) are purchased as part of normal domestic shopping undertaken by the resident operator. This is expressly confirmed in the planning submission.

Waste Collection

- 12. Yes, waste is collected by a licensed carrier, exactly once per fortnight, using a standard domestic-scale wheelie bin.
- 13. A single fortnightly collection is less than normal household waste collection and does not amount to harmful additional activity.

Traffic Movements – “1 per day”

- 14. Several representations question the average of one vehicle movement per day.

Evidence Behind the Figure

15. Longcroft Cat Hotels have been operating for over 14 years in more than 30 residential locations, including Conservation Areas and National Parks. Across this dataset:
 - a. The average number of customer visits per day is 1.
 - b. The majority of stays are 7–14 days, meaning that arrival/departure days are infrequent.
 - c. It is typical that our hotels achieve an average of 70% occupancy in year 3 (with figures being lower in the first 2 years), meaning that they rarely run at full capacity.
 - d. There are no daily staff movements and no deliveries.
16. This is therefore not an arbitrary estimate; it is based on actual, long-standing operational evidence, unchallenged by any consultee.

Traffic Safety

17. The Transportation Manager:
 - a. Raised no objection;
 - b. Confirmed parking and turning are sufficient;
 - c. Confirmed no road safety concerns.
18. This carries significant weight.
19. The representors' disagreement with the figure is not evidence. The planning system must rely on substantiated data and professional consultation responses.

Narrow Road / Access Width

20. One representor notes that South Road narrows at the entrance.
21. Transportation assessed this exact point. Their formal consultation response confirms:
 - a. Safe access is achievable

- b. Sightlines are acceptable
 - c. Turn-in and turn-out space is adequate
 - d. Parking and turning within the site prevent any risk of on-street obstruction
- 22. The LRB must give primacy to the professional road safety authority, not lay commentary.

Drainage and the High Water Table

- 23. One representation repeats an objection already resolved during the application.
- 24. Key facts:
 - a. The Flood Risk Management Team originally requested revised drainage information.
 - b. The applicant produced updated calculations using the 37% climate change allowance.
 - c. Flood Risk Management then issued a full withdrawal of objection.
 - d. The drainage is now accepted as compliant with NPF4 Policy 22 and MLDP EP12/EP14.
- 25. It is therefore demonstrably incorrect to suggest that drainage remains a problem.
- 26. In addition:
 - a. The soakaway location was adjusted to meet the 5m boundary offset required.
 - b. The development results in only c.53m² of impermeable area—equivalent to a modest shed.
- 27. The allegation that the neighbour's property "would be flooded" is not supported by any technical analysis, whereas the Council's own specialists have assessed and approved the proposed solution.

Economic and Community Benefits

28. One representor challenges the existence of any positive benefit.
29. The proposal:
 - a. Supports NPF4 Policy 26, which encourages small, home-based microbusinesses.
 - b. Provides a needed local service (Moray has very limited welfare-centric cattery provision).
 - c. Supports the local economy through ongoing small-scale spending, tradespersons, and animal-related commerce.
 - d. Relocates a previously approved and successfully operated cat hotel building, minimising embodied carbon and waste.
30. The absence of external employees does not diminish the fact that NPF4 expressly supports home-working microbusinesses, which by definition will not create employment elsewhere.

Summary

31. All three representations raise points which:
 - a. Were already considered and addressed by technical consultees;
 - b. Are not supported by any professional or objective evidence;
 - c. Misunderstand the very low-intensity nature of the proposed use; and
 - d. Do not outweigh the clear evidence of compliance with NPF4 and MLDP policies.
32. The proposal remains:
 - a. Low-impact

- b. Well-screened
- c. Consultee-approved (roads, environmental health, drainage)
- d. Policy-compliant
- e. Appropriate for a residential setting under NPF4 Policy 26

33. For these reasons, I respectfully submit that the further representations contain no new evidence and do not alter the conclusions already set out in my Notice of Review.

Yours sincerely,

Abigail Purser