

1.	<u>Sederunt and Apologies.</u> (* Associate, ** Youth)	ACTION
a.	<p><u>MEMBERS</u></p> <p>Alastair KENNEDY(Chair), Gordon METHVEN(Sec'), Steven MILNE(Treasurer), Bob ANDERSON, David CHAPMAN*, Steven CHRISTIE, Anne GLOVER, Eric MARRIOTT, Donnie McLEAN, Pat PATERSON, Mary WALL, Jim WISEMAN(Minutes).</p> <p><u>IN ATTENDANCE:</u></p> <p>Lt. Col. Grenville JOHNSTON (Lord Lieutenant of Moray), Cllr John DIVERS, Krystian KACZALA (Stagecoach) Hazel LAWSON (Northern Scot), PS Michael IRWINE & PS Neil Morrison (Police Scotland) Aileen MARSHALL (ESAF)</p> <p><u>APPOLOGIES</u></p> <p>Gordie WELLS Eddie WALLACE, Bryan WATSON(Vice Chair), Cheryl ROBB, Cllr Graeme LEADBITTER, Cllr Patsy GOWANS, Cllr James ALLAN, Cllr Barry JARVIS, Cllr Mike SHAND, Kathy GRANT (Community Warden)</p> <p><u>WELCOME</u></p> <p>Alastair Kennedy welcomed everyone to the meeting and introduced Grenville Johnston, Lord-Lieutenant of Moray.</p>	
c.	<p><u>WORLD WAR 1 CENTENARY - Lieutenant Colonel Grenville Johnston</u></p> <p>Grenville Johnston outlined that the Scottish WW1 centenary celebrations will start in Glasgow on 10th August 2014 with a drum service at Edinburgh Castle which will have a substantial representation from Moray and plans are being developed for that. The commemoration will take place over 5 years 2014 to 2019 in Moray at key events. Scotland will have a commemoration website for Council's to populate. The committee are seeking information and access to artefacts for display. A schools programme is starting quietly with for example Miltonduff School researching the names on their war memorial and Grenville Johnston hoped this would be a lead to other schools. On Remembrance Day a concert will be held in St Giles Church singing all the old songs. The Community Council followed Grenville's lead in singing "It's a long way to Tipperary...".</p> <p>There were 4 VC's given to Moray soldiers and each will have a commemorative plaque placed where relatives want them to go and they will be erected on the dates they were awarded. There will also be a series of lectures by the Western Front Association and there will be exhibitions in Elgin Museum and at Fort George. The 6th Seaforth Colours, currently in St Giles are to be examined and put on display again.</p> <p>In response to a question from Eric Marriott, Grenville Johnston said that Museum Staff may wear period costume at the opening of the exhibition.</p> <p>There was a discussion on the rules for removal of the poppy wreathes. Anne Glover explained why she had brought the point up at the Community Council. And Alastair Kennedy said that we had felt it was disrespectful to leave them in place when they were tattered but needed guidance on how long they should stay. The Lord- Lieutenant of Moray was also unhappy if the wreathes were withered and not in place. He confirmed that there were no rules that he was aware of on when to remove the wreathes, but said that they should stay at least until the end of January.</p> <p>Donnie MacLean asked about making the Ladyhill Gardens into a war memorial which Grenville Johnston said was an excellent idea because of the links with the war veteran's cottages.</p>	<p>All</p> <p>AK</p> <p>Env</p>
2.	<p><u>PREVIOUS MINUTES 11th MARCH 2014</u></p> <p>Bob Anderson pointed out that he should have been recorded as apologies not as present. With that amendment the minutes were proposed as a true record of the meeting by Steven Christie, seconded by Donnie MacLean and there were no objections.</p>	
3.	<p><u>MATTERS ARISING.</u></p> <p>Page 2 item 3d – Poppy wreaths – Resolved – see 1c Above.</p>	AK

	<p>Page 2 item 5a – Bishopmill Post Office – letter sent, FOI Received awaiting response.</p> <p>Page 1 item 4a – Police Scotland slow responses PC Irwine said Police Scotland can't apologise for prioritising.</p> <p>Page 1 item 4b – Bus Station Display – has been discussed with Moray Council and appears to be a tracker problem.</p> <p>Page 3 item 8 – Funding group still to meet</p> <p>Page 4 item 13a – Coachdriver's yearbook cancelled but we still have to pay.</p> <p>Page 4 item 13b – Cooper Park pond cleaning email was circulated regarding timing.</p> <p>Page 4 item 13d – Refuse lorries driving complaints – no update.</p> <p>Page 4 item 13e – Morriston running track maintenance. Cllr John Divers reminded Pat Paterson that the athletics clubs were to be responsible for the upkeep of the track.</p>	<p>JW</p> <p>MI</p> <p>KK</p> <p>All</p> <p>AK</p> <p>DM</p> <p>PP</p>
4.	AGENCY UPDATES	
a.	<p>POLICE SCOTLAND – Mick Irwine</p> <p>PS Mick Irwine reported that the Elgin office responded to 707 calls in the month with 16 vandalism, 1 car and 1 motorcycle stolen, 3 thefts from cars, 1 break-in to a house and 1 break-in to industrial premises. Mick Irwine advised that it is easy to forget to lock your doors and break-ins are very invasive. Then he gave an insight into the work involved and the sense of satisfaction that comes with working on a break-in crime.</p> <p>Eric Marriott gave an example of how information from the public successfully recovered stolen property. Gordon Methven recalled a statistic that at one time 85% of crimes are solved with the aid of Information from the public.</p> <p>Anne Glover advised she was aware of a distraction scam where one person knocks at front door while another breaks-in at the back.</p>	
b.	<p>STAGECOACH – KRYSZTIAN KACZALA</p> <p>Krystian Kaczala reported that the new timetable was operational. Also new destination blinds have been installed. However, the real time information is not right yet.</p> <p>Alastair Kennedy suggested a map would be useful on the timetables. Alastair then asked about the service to Larch Court, which is to be curtailed at the end of June due to an issue with Newfield Road. Alastair Kennedy advised that he would send a letter about the situation to the relevant people. David Chapman said that having looked at the situation perhaps yellow lines and enforcement would be the only solution.</p>	AK
c.	COMMUNITY WARDEN – No Report	
5.	COMMITTEE REPORTS:	
a.	<p>PLANNING. – See Report</p> <p>James Wiseman had circulated Issue 1 of the joint ECC/ESAF report on the Moray Local Plan. He also went through the letter from Gary Templeton. Various amendments were made.</p> <p>Alastair Kennedy had circulated a letter of response to the Western Link Road consultation's letter which was agreed.</p> <p>David Chapman confirmed that the wind farm that was not shown in the Brownmuir package was the existing Glenlatterach Wind Farm.</p>	<p>JW</p> <p>AK</p> <p>JW</p>
b.	<p>RECREATION, LEISURE AND ENVIRONMENT – See Report</p> <p>Anne Glover reported that Ladyhill had been tended to including planting the Urn.</p> <p>Fair Trade: Mary Wall reported no news on the submission which is seen as good news.</p> <p>Mary Wall also advised that she had renewed the subscription to the Allotments Association which cost £5.</p>	SM

c.	ROADS & TRANSPORTATION. – No Report	
d.	YOUTH. – No report	
6.	COMMUNITY PLANNING.	
a.	ELGIN SOUTH AREA COMMUNITY PLANNING FORUM See ESAF Minutes circulated and available on www.yourmoray.org.uk	
b.	SPICE – See minutes circulated Two sessions have been held with ACE Litter pick 26 & 27 April 2014 was successful with 35-40 bags of rubbish. Steven Christie gave recent examples of littering, dog fouling and even human fouling and explained the inadequacy of the current fines and proposed lobbying Richard Lochhead for increases in litter, dog fouling and fly-tipping penalties. In support of that Donnie McLean gave examples where the cost to the Council of disposing of fly-tipping were more than any fine would have been. This was agreed and Steven Christie is to write the letter.	SC
c.	JCC Alastair Kennedy reported that the JCC had heard a presentation on “Living it up” living with a long term condition, details of which had been circulated. A panel is to be set up to resolve disputes in problem Community Councils.	AK/All
d.	TOWN CENTRE DESIGN CHARRETTE – No report	
e.	COMMUNITY COUNCIL REPRESENTATION IN COMMUNITY PLANNING – No Update Whilst there was no update it was noted that the work on the Moray Local Development Plan would be a useful example of good engagement.	
7.	EDUCATION	
a.	ELGIN HIGH SCHOOL Alastair Kennedy updated ECC on Martine Scott’s change of circumstances.	
b.	ELGIN ACADEMY – NO REPORT	
c.	PRIMARY SCHOOLS – NO REPORT	
8.	TREASURER’S REPORT. Account #1 £3,337.96 Account #2 £1,328.38 The subgroup of Steven Milne, Eric Marriott, James Wiseman and Alastair Kennedy appointed to look into the Elgin Community Council budget and spending forecast has yet to meet.	SC/EM JW/AK
9.	ONGOING TOPICS	
a.	DEANSHAUGH PLAYING FIELDS - No Update	
b.	OLDMILLS No Update	
c.	LESSER BOROUGHBRIIGGS – No Update	
d.	ELGIN FUND – No Report	
10.	EVENTS	
a.	COMMUNITY AWARDS Gordon Methven reported that an awards ceremony has been planned for 21 st November 2014 and there is a meeting later this month to progress matters. A press release outlining the categories will be issued later in the year.	GM

b.	TRAINING – No update
11.	<p>CHAIR'S REPORT</p> <p>The Chair's report attached was taken as read.</p> <p><u>09/04/14</u></p> <p>Discussion with David Duncan re. Charrette outcomes.</p> <p><u>15/04/14</u></p> <p>Attended the NHS meeting organised by ESAF.</p> <p><u>16/04/14</u></p> <p>Meeting at the bank re. JCC bank account.</p> <p><u>17/04/14</u></p> <p>Meeting in Aberdeen with Keolis/Eurostar about the future of rail travel in North East Scotland and further afield. An excellent meeting where our views were very much accepted.</p> <p><u>22/04/14</u></p> <p>Community Engagement Group meeting. Discussion with Gary Templeton about the draft Moray Development Plan timescales not adhering to the National Standards for Community Engagement. A future meeting to discuss will take place. The group discussed further that a number of consultations have not met the standards.</p> <p><u>23/04/14</u></p> <p>Sustainable Education review but I was unable to attend.</p> <p><u>24/04/14</u></p> <p>SPICE meeting which involves Achieving Community Empowerment (ACE). This was the second meeting with the ACE facilitator.</p> <p><u>26/04/14</u></p> <p>Took part in a litter pick as a joint venture between SPICE and ECC.</p> <p><u>27/04/14</u></p> <p>Second day of the litter pick. Steven Christie and myself removed a tree which was blocking the view of the bus station for the police controlled CCTV camera.</p> <p><u>30/04/14</u></p> <p>I attended a meeting of the LEADER Transition Working Group. This is the group which was set up to drive the EU requirement that a Locally Led Development Strategy is developed. This strategy will identify local needs in Moray and will be the vehicle used to decide where EU funding gets spent in future.</p> <p><u>06/05/14</u></p> <p>As agreed by ECC earlier, I attended a conference in Edinburgh on Empowerment and which was very much about the draft Community Empowerment Bill which ECC responded to. The slides used at the conference will be available very soon and these will be forwarded along with a brief report on the conference.</p> <p><u>08/05/14</u></p> <p>I had a morning meeting with Tracey Rae, Community Council Liaison Officer (CCLO).</p> <p>The Joint Community Councils of Moray (JCC) meeting took place that evening. Gordon Methven attended to represent Elgin. An oral update will be given.</p> <p>During this period there have been a number of letters between a resident of Newfield Road and Stagecoach. Buses travel along Newfield Road to use the turning circle at the end. However, vehicles parking on the circle and at different points of the road have caused obstructions for buses and there have been "problems". The resident has made a number of allegations about "near misses" and abusive drivers. ECC was about to respond twice but each time we were overtaken by</p>

	<p>events when fresh letters arrived. The eventual outcome was that Stagecoach, in the interest of harmony, will withdraw buses from Newfield Road. I will now write to Stagecoach to find out if residents of Larch Court will still have access to a bus service.</p> <p>I have also spent considerable time drafting a response to the Western Distributor Road Planning Application. You will recall that ECC agreed at the outset of the process that the only viable option of those presented at the time was the Edgar Road – Wittet Drive one and supported it in principle. Like every other member, I am aware that a number of people, for a variety of reasons, do not wish to see this road built. The response will reflect that fact but that there are also others who do wish to see the road built. I intend to send the draft out over the weekend. Members can decide if they will support the draft becoming our response and will be asked that question at the meeting.</p>	
12.	<p>SECRETARY'S REPORT – See Report</p> <p>The Secretary's report attached was taken as read.</p> <p><u>Secretary's Report May 2014</u></p> <p>I didn't have a lot of meetings to attend during April as I kept my diary clear for preparation for my daughter's wedding on 4th May.</p> <p>One meeting I did attend as in relation to community awards. We now have a confirmed date of Friday 21st November for the ceremony and the award categories have been decided. The details will be released nearer the time. The next stage will be to decide on the process, what form the awards will take, seek sponsorship and get companies and agencies on board.</p> <p>There was a great deal of correspondence during the last month.</p> <p>We received a number of notifications of objections to the Western Link Road from residents that stay on or near the planned route. These have been circulated.</p> <p>The annual grant for April to September has been received, £1096.22.</p> <p>The co-option of Donnie Mclean has been confirmed by Tracey Rae and she has also forwarded a member's pack for Donnie's consideration.</p> <p>There were a number of letters received regarding the roundabout at Newfield Road which has been under discussion. I am sure this will be covered in committee reports.</p> <p>We also received a letter from Richard Lochhead confirming that the Moray Council has appealed the decision by Police Scotland to withdraw the traffic warden service. This letter contained a copy letter from Mark Palmer director of Corporate Services in the Moray Council which stated that Moray Council may look into applying for Decriminalised Parking Enforcement if Police Scotland do not reverse their decision. I will scan and circulate this when I get the chance.</p>	
13.	<p>A.O.C.B.</p> <p>It was agreed that Eric Marriott would represent the Community Council at the meetings on the future of Grant Lodge.</p> <p>Alastair Kennedy asked members to check their email and respond more frequently as he was not sure if all emails were being read.</p> <p>Steve Christie advised that some streets would be surface dressed in the near future – see Moray Council website for details.</p> <p>Bob Anderson advised that the toilets in the New Elgin Hall had been transformed and this is to be commended. Mary Wall asked for a letter of support to be sent. Councillor John Divers complimented the Hall Committee on their perseverance noting that they had been let down time and again by contractors. Steven Christie added that the Main Hall had been redecorated while the hall was closed.</p> <p>It was understood that the St Giles Centre toilets were also being upgraded.</p>	<p>EM</p> <p>All</p> <p>GM</p>
14.	<p>NEXT MEETING</p> <p>7:00pm Tuesday 10th June 2014 Council Chambers, High Street, Elgin.</p>	All
15.	CLOSE: There being no further business the Chair thanked all those present for attending and	

	closed the meeting at 9:00pm.	
--	-------------------------------	--

CITATION: These Minutes were adopted as a True Record of Proceedings:

Proposer: _____

Secunder: _____

Chair: _____ Mr
Alastair Kennedy

Date: _____



**City & Royal Burgh of
ELGIN COMMUNITY COUNCIL**



ELGIN SOUTH AREA FORUM



**CONSULTATION RESPONSE TO
THE MORAY LOCAL DEVELOPMENT PLAN
PROPOSED PLAN 2014
(REVISION 01)**

CONTENTS

1) INTRODUCTION.....	2
2) TOURIST INFORMATION CENTRE.....	2
3) GYPSY'S & TRAVELLERS	2
4) HOUSING MIX	2
5) R13	3
6) OPEN SPACES and ALLOTMENTS.....	3
7) ADDITIONAL BURDENS	4
8) DIGITAL COMMUNICATION,	4
9) PARKING	5
10) SURFACE WATER DRAINAGE	5
11) ALLOTMENTS	5
12) ROADS	5
13) A96	5
14) JUNCTION IMPROVEMENTS AND TRANSPORT LINKS.....	5
15) RAIL FREIGHT	6
16) HOSPITALS ETC.....	6
17) SCHOOLS	6
18) COMMON GOOD	6
19) OLDER PEOPLES PROVISIONS.....	6
20) CEMETRYS.....	6
21) ECONOMIC STRATEGY	6
22) EXTENSION OF TIME.....	7
23) CLIMATE CHANGE	7
24) CONCLUSION.....	7

HISTORY

Revision	Scope	Author	Date
01	First Draft	JCW.	09 MAY 2014

INTRODUCTION

The Elgin Community Council and Elgin South Area Forum would like to thank everyone who has responded to us regarding the Local Development plan. Part of our work on this consultation was to raise the profile of the Proposed Plan consultation in the press which has resulted in a couple of approaches directly to the Community Council and ESAF. We are pleased to hear that increased attendances were noted at the April 2014 exhibitions and hope that we helped achieve that in Elgin at least.

A committee of ten people from these community groups met and identified a number of areas for further exploration in relation to Elgin largely taken from our local knowledge of the community and issues raised in the past. Access to such knowledge is an advantage of consulting the Community Council and Elgin South Area Forum whose membership old and new are genuinely interested in representing the Elgin Community.

We are worked closely with the Moray Council to ensure community issues are presented in a competent manner with due regard to the Council's timescales. The terminology "the Plan", "Development Plan", and "Proposed Plan" are used interchangeably therefore all of our comments should be addressed and incorporated in the final version of the Development Plan which should be amended where required to give maximum effect to our input. There are varying lengths of explanation against items but this should not to be interpreted as the degree of interest we have in an item. In addition we request that we are given an explanation where any of our comments are rejected.

TOURIST INFORMATION CENTRE

Please add a formal commitment to have the Elgin Tourist Information Centre (TIC) located in High Street, Elgin. In the document "Elgin – City for the Future" there is a serious wish/intention for the TIC to be sited within the Plain Stones area. We have previously argued against the TIC being situated in the library because we believe it should be situated where people arrive in the city and not somewhere they have to go searching for as at present. The rear of the Giles Church was discussed at one time as was a form of dome at the west end of the Plain-Stones. Signage was and still is inadequate.

GYPSY'S & TRAVELLERS

We request inclusion of a link between the Gypsy Travellers Policy and the Housing in the Country Policy to ensure aesthetic integration of halting sites. Clearly, the community links the desire to accommodate gypsy's or travellers with their willingness to comply with aesthetic requirements, registration and payment for services. Enforcement is a key tool to ensure success in this aspect and the possibility of planning enforcement would strengthen this requirement on gypsy's and travellers.

HOUSING MIX

We are concerned about the housing mix and integration of society. Social Housing and integration of that with other housing including balance of social rented versus affordable purchased is of interest. We want the commuted payment option removed from Policy H8 because we think all housing should be integrated.

We have looked at social housing and accessible housing along with the location of future facilities, services, cemetery's, etc and we believe some clarity is required before the Plan is finalised on how the quantity and distribution of the housing types, facilities, services, cemetrys, schools etc, is to be decided.

We also thought the plan favoured the South rather than the North of Elgin. However, we are happy with the explanation that the Plan promotes growth in both the north and the south.

A Meeting of the City & Royal Burgh of Elgin Community Council was held in the
COUNCIL CHAMBERS on Tuesday 13th MAY 2014 at 7.00pm.

At Main Issues Report stage, the preferred option was to bring forward the existing MLP2008 LONG designation in the north west and identify a new LONG in the north east. However, it was agreed to carry out further landscape and transportation studies and these highlighted that there was very little to choose between the two sites and we concluded that both would happen in time and that there were benefits for Elgin if we took a much longer strategic view to growth. We had particular concerns about landscape impact for Elgin south and have identified a requirement for advance landscaping.

We also have a programme of masterplans where we will be looking to work proactively with developers and the local community to prepare masterplans which can then be approved as supplementary guidance. One of the primary aims of this approach is to raise the standards of design and bring the developer, Council and local community together much earlier in the process.

R13

We have had representations about R13 housing allocation. There are community concerns about views of green spaces from existing properties, access to Core Paths or Rights of Way and concerns about golf balls going astray and hitting people or properties in R13.

The Moray Access Manager has said the path is Core Path EG43 and he intends to comment as follows "*Remove current text of 3rd sentence of R13 statement and replace with the following, "Core Path EG43 running along the southern part of the site should be upgraded to a cycle route standard to accommodate active travel".* We would support his comment or make the comment if he chooses not to.

Because of the difficulties that would arise regarding safety and the doubtless objections, plus the fact that the current housing follows a natural curved boundary we agree that this area should be left as a piece of amenity land. That could serve as amenity land for R4 and R7 where people could walk dogs etc. Otherwise there's no accessible Amenity Green space in the area. The golf course is not amenity space for any and everyone as we know. We don't want every square inch built on. Furthermore, the golf course is a huge asset to Elgin and we don't want to spoil that.

There is no doubt that open space in Elgin is being eroded. We just need to look at Reiket Lane and how that open space was destroyed to see an example of that. The previous Local Plans acknowledgment that "residential areas of New Elgin are lacking in open space provision for recreation.... Moray Local Plan 2000"

Could a house be built in the gap with a decent width of path left for access to the area behind. The current road is somewhat narrow to comfortably accommodate a junction at the gap. However, that could settle the future of the piece of land once and for all.

Landscaping of R13 would be a positive response!

OPEN SPACES and ALLOTMENTS

All critical open spaces whether it be for visibility splays or just to punctuate otherwise dense development should be listed and detailed in some document. For example, in the draft plan ENV3 Amenity Greenspace at East Road where car dealerships park show-cars within the verges which has been the subject of many complaints over the years including one just recently. Whether or not these are delineated they should be defined so as to be enforceable to save the cost of planning enforcement by simplification.

There is no doubt that open space in Elgin is being eroded. We just need to look at Reiket Lane and how that open space was destroyed to see an example of that. The previous Local Plans acknowledgment that "residential areas of New Elgin are lacking in open space provision for recreation.... Moray Local Plan 2000"

2.0 THE PLANNING CONTEXT

2.1.2 "*In setting out its planning objectives for Elgin, the Local Plan acknowledges that the existing high density residential areas of New Elgin are lacking in open space provision for recreation ...*"

Green spaces/green corridors in the built environment provide opportunities for social contact and recreation, however, local residents believe these areas are being eroded rather than supplemented.

We are concerned that the requirement to provide open spaces at a rate of 30% in developments over 200 properties. This could drive the wrong behaviours amongst developers and could ensure that developers build in blocks of less than 200 units or to reduce plot sizes

because of the open spaces requirement. It is not clear how staged development will be handled. A potential solution to this problem would be to build houses with gardens suitable for use as allotments as has been done in the past. This solution would also reduce the need for future disposal of amenity land which can be controversial. We are not suggesting that all land should be built on because we would still need public circulation space.

ADDITIONAL BURDENS

Some sites are demarcated or protected against flooding and land slip by existing features such as walls, drainage and topography that are not in joint ownership. Regardless of whether an existing site protects a new site or where a new site protects an existing site the elements essential for protection should be identified and recorded against the relevant designations. Similarly, a requirement to afford suitable access for future maintenance should be recorded in the local plan. Whilst these are to some extent civil matters they would give some comfort to adjacent members of the community and they would sit well beside other legal burdens such as wildlife protected by criminal law. We are aware of at least one place where this occurs.

DIGITAL COMMUNICATION,

Policy ED6 refers to digital communications and states as follows:

Proposals for communications equipment and infrastructure (masts; relay stations; cabling etc related to mobile phone or broadband) will be assessed on their impact on landscape and townscape character; compatibility with surrounding uses; affect on environmental designations. Locational requirements (on technical/operational grounds, and links with transport corridors) will be recognised during consideration of proposals. Applicants must justify their choice of site, including the potential to share facilities, and may be asked to carry out measures to disguise or mask installations. Sharing of facilities must not result in increased adverse visual assessment.

Justification Modern telecommunication systems continue to grow rapidly, and are an integral part of business operations and lifestyles. The availability of, and access to, these technologies will allow Moray to remain economically competitive, and facilitate business opportunities in rural areas. Often the equipment has to be located on high ground or buildings, or be in proximity to roads and railways. The visual impact of proposals on the landscape, environment and scenery must be minimised wherever possible. The health and safety level of radio frequency emissions are controlled by other regulatory bodies, and are not deemed to be a valid "planning consideration". Accordingly they will not be taken into account when considering proposals.

We consider this peace meal development of a major and growing infrastructure component to be wholly inadequate. High demand, competition and the nature of the technology warrants a more planned approach. There is and will be in the future great demands on the digital network with improvements in the speed and capability of digital communications and it is likely that competition will be necessary to reduce cost through competition. We believe that people will want and need these services and development of these communications needs to be planned to ensure wide availability of access and choice between operators. Planning at this level would ensure the infrastructure is 'future proof' as far as possible to avoid installations that very quickly become obsolete.

The main justification text seems to focus more on transmitters used for mobile phone networks. As far as I know there are few major antennas used for the likes of say broadband. The rollout fibre to the cabinet (fttc) broadband is progressing, Phone cabinets in Elgin have been getting rewired for a few months now. This can cause some disruption as BT need access to manhole covers. For example, the recent fibre line being put into Lhanbryde the main A96 trunk road had to be partially closed off while work was carried out. Having said that the time to lay the new cable in the underground conduit was minimal maybe disrupting traffic for a day. Some work was done overnight. Advantage of the new fibre lines are home connection are more robust, future proof and can handle very high rated data transfer and by comparison with mobile/wireless, everything is hidden underground. The section on digital communications should make reference of traffic considerations when roads are partially closed to allow installation of fibre optics etc. or define corridors for services to be laid

PARKING

Policy T5 and Action Programme ref P31 briefly deal with Parking Standards but are not adequate in relation to the current situation. We would like to see some reference in the plan for the provision of short term 'on street parking' in Elgin town centre. At present short term spaces are extremely difficult to find due to some drivers parking all day or at least for several hours in the existing spaces. Some mention should be made with regard to the lack of traffic warden provision and what the council plan to do about it. 'Update if necessary' shows a complete disregard of what the public are having to endure in Elgin i.e. having to pay for 1 - 2 hours parking when they are on an errand that takes five minutes. It seems that the Council are happy they are getting extra revenue and have no plans to do anything about it.

SURFACE WATER DRAINAGE

Policy EP5, page 51 sets out the Policy Surface Water Drainage. Drainage capacity and provision is discussed with Scottish Water and SEPA throughout preparation of the Plan to identify capacity and upgrading requirements. Moray Council also provide information every two years to Scottish Water on future housing and employment land developments to influence their investment programme.

ALLOTMENTS

In Policy E5 we are pleased to see allotments included as part of the provision for new open spaces in residential sites. Also specific mention on Pg 38 of allotments making it easier to site them in open spaces where they do not adversely affect the primary function of the space or undermine the amenity value of the area and where a specific locational requirement has been identified by the Council. We note your comment that you will be addressing Open Space Strategy including allotments as a priority area of work for next year.

ROADS

In relation to Policy T1 Transport, we are disappointed that none of the transport improvements relate to Active Travel suggesting it is not a priority when the Council has undertaken surveys which show the extent of modal shift to Active Travel in Elgin. Cycling rarely takes place solely on designated cycle paths. Please add to Policy T2 that routes for cyclists should also link to the road network. In Policy T3 please add reference to the need for intermodal provision eg cycle parking at bus stops.

A96

We appreciate your consideration of the A96 in the proposed north and south long term development sites and to indicate the much longer term growth of Elgin City as a constraint and to avoid a bypass line bisecting the city. Not including a route preference for the A96 in the Plan given the limited details available at present is appropriate although we would like to know the Council's formal response to the A96 consultation.

JUNCTION IMPROVEMENTS AND TRANSPORT LINKS

We are aware of a section of the Elgin Community who believe the Western Link Road should be removed from the local plan. We do not wish to make any comment on the Link Road's inclusion as we are aware that this is progressing through Planning at present. However, we would ask that should the scheme be withdrawn in the near future then it should also be removed from the Development Plan.

We have no comment on transport issues other than to say the lorry park stuck out as an issue. We thought it would be best located in a services area to east end of town at Barmucity or thereabout.

RAIL FREIGHT

We recognise our former member George Littlejohn as an expert on rail freight and as such we defer to his superior knowledge on all matters rail. We recommend the Council take cognisance of any representation he chooses to make.

HOSPITALS ETC

We consider the input from the NHS Grampian to be very important because allocating development space for health service purposes appropriate to meet the geographical spread of Elgin and Moray would be a commitment from the NHS to Moray that should be followed through. As Richard Carey wasn't able to attend the ESAF April meeting we've requested information on future plans from him. He has promised to get back and described our question as 'reasonable and pertinent'. We await his response and in the meantime would be happy to discuss any thoughts you have on the matter.

SCHOOLS

School capacity should be aligned with the outcome of the school estate review and welcome your comment that you are working closely with your colleagues in Education to ensure the Plan has a longer term vision that aligns with the school estate review. In the meantime no area with a school designation should be allocated for any other purpose.

COMMON GOOD

Common Good ground is of interest and we understand R6, and perhaps others, might be common Good Land or some sort of unclaimed land. Could a map of common good land be provided in the local plan and some guidance given as to how plans for Common Good Land should be developed and who has the say in what can happen.

OLDER PEOPLES PROVISIONS

We are looking at the provisions for older folks like step down housing, old folks homes, cemetery provision etc. Policy H9 makes a significant step towards addressing housing for our ageing population, with the "mix" of housing to be aligned to what the Housing Need and Demand Assessment has identified. This carries through into where housing for older and less able people is located. So we would like to be taken through what has the Housing Need and Demand Assessment identified and if certain needs are identified why is the plan only taking "a significant step towards" and not actually fulfilling the needs. After all, look at how the ageing population is expected to grow over the period of the plan.

CEMETRY

The only mention of cemetery's in the Local Plan appears to be in the Action Plan (very last box page 23) where it mentions the search for a new cemetery site. Looking at the maps we would suggest that the site currently designated as Long 2 to the south of I13 (Linkwood Distillery) might be suitable. It may also be possible to develop part of this site for 'Natural Burials' (trees not headstones) which would also tie in with proposals under the section Natural Environment. There are other possible sites which could also be considered however, the one mentioned above is about a 5 minute walk from the existing cemeteries, and may also present an opportunity for including a crematorium.

This subject has been under consideration for a number of years and we are concerned that any site once identified may take some years to become operational therefore there needs to be something much firmer in the plan about cemetery provision.

ECONOMIC STRATEGY

We are pleased to see and very much welcome the "joined up thinking" which has led to the cross referencing in the draft Local Development Plan to The Moray Economic Strategy / Elgin

A Meeting of the City & Royal Burgh of Elgin Community Council was held in the
COUNCIL CHAMBERS on Tuesday 13th MAY 2014 at 7.00pm.

– City for the Future Strategy. The future actions which are identified within these (now combined) strategies require to be implemented and it is crucial that such actions are “firmed up” and do not get lost and that any “piecemeal” development which impacts on these actions is not allowed.

The Lossie Green area is a prime example. Albeit some flexibility needs to be built in, it is most important that any short-term actions (or quick fixes) identified in the Masterplan are delivered within the strategic overview and the long-term vision is maintained. We suggest that a strategic view must be taken and maintained of the management of land and property assets within the Lossie Green area so the vision for the future or “the bigger picture” is not compromised in any way.”

EXTENSION OF TIME

However, we have agreed that because of a number of factors, including a delay with posting the Plans and the Easter weekend, that we will extend the deadline, for community groups only, until 5pm on 23rd May. We will summarise and start responding to all other representations, in the knowledge that representations from community groups will be received before the extended deadline.

CLIMATE CHANGE

This ties in with active transport. Again, safe off=road routes should also link to the road network. Prioritise ensuring that roads are safe for all uses to minimise the need for off road routes (eg by designing for slow vehicle speeds).

Wood stoves should be included throughout as an example of key renewable technology.

CONCLUSION

Thank you for consulting the Elgin Community Council on the Proposed Plan. If you require any further clarification or interpretation of our comments or if you want to develop any of the points with us please contact James Wiseman in the first instance. We would like to follow through with a meeting at your earliest convenience to discuss the extent to which our comments are to be followed through, resolved or implemented.

Report prepared by James Wiseman

For The City & Royal Burgh of Elgin Community Council

9th May 2014



The City and Royal Burgh of

Elgin

Community Council

Development Control Manager
Environmental Services
Moray Council HQ
High Street
Elgin
IV30 1BX

Dear Mr McPherson

14/00551/APP - Site Linking A96(T) To Wittet Drive To Edgar Road Elgin Moray

Elgin Community Council is very aware that this proposed route has caused some division of opinion across Elgin and Moray and wish to make the following comments.

At the beginning of the consultation process which led to this planning application Elgin Community Council was asked for comments on five options to help disperse traffic in Elgin, help lessen the pressure of traffic using New Elgin Railway Bridge, allow improved commercial access to Edgar Road from the west, improve access to an area of land for future development and also to assist with overall traffic flow.

There were two "outer" route options, the Edgar Road / Wittet Drive option, the possibility of "adjusting" roundabouts and junctions across west Elgin and a "do nothing" option.

The two outer options were obviously totally unviable due to costs and the "do nothing" one was simply **not** an option. The other proposal, which was to make adjustments to roundabouts and junctions, Elgin Community Council believed would achieve very little for traffic flow and nothing towards suitably distributing traffic in the west and south-west of Elgin. That left the Edgar Road / Wittet Drive option and Elgin Community Council members agreed that this was the only feasible option which would go some way towards achieving the desired outcome.

The other three quadrants of Elgin each have a suitable route in place to distribute traffic ie. Morrision Road, Lesmurdie Road and Reiket Lane. That being the case, Elgin Community Council initially supported, in principle, this proposed route which actually completes the fourth quadrant, thereby assisting with distribution of traffic.

When the plans went out for consultation there followed a public outcry, mostly from residents that stay along the proposed route and we were verbally asked to support their campaign against the proposals. As representatives of the whole of Elgin our members believed we were obliged by our constitution to reflect the views of all residents across our area and felt unable to participate as a group. We did not however prevent our members from individually supporting any protest campaign.

A Meeting of the City & Royal Burgh of Elgin Community Council was held in the
COUNCIL CHAMBERS on Tuesday 13th MAY 2014 at 7.00pm.

It is regrettable that the planned route runs partially through a residential area, however, the other three distributor roads run close to many residential properties also and this has been alleviated where possible in Wittet Drive.

Since the initial consultation there has been a great deal of work done with stakeholders, including Elgin Community Council, to make the proposed route as user-friendly as possible and as safe for all modes of traffic, including foot traffic and householders in close proximity. This has led to a number of agreed changes to the original proposal.

Nevertheless, Elgin Community Council members are aware that concerns have still been raised regarding the siting of crossings at Edgar Road and Wittet Drive on safety grounds and although members are led to understand they have been situated as suitably and safely as possible we would like these given due consideration during the passage of the application to ensure whether anything further can be done in terms of safety, including moving them or imposing specific conditions if deemed necessary.

Elgin Community Council can see overall benefits in having the road built. These include:-

- better distribution of traffic in west and south-west Elgin
- diverting some traffic away from Main Street, New Elgin
- a further rail crossing
- ease of commercial access to Edgar Road
- the opening up of further land for development
- working together with the Education Department, should provide improved school drop-off / pick-up facilities thereby improving safety for children at those times.

One incident which highlighted to Elgin Community Council the necessity for another crossing over the railway line was when the New Elgin Railway Bridge was unusable due to flooding which more or less caused gridlock in much of Elgin. It is appreciated there is a Flood Alleviation Scheme nearing completion but other reasons may arise, like maintenance, which could require a period of closure of this bridge. This is felt to be an important factor in support of the proposed route across the railway line.

Furthermore, Network Rail has stated it intends to close a large number of level crossings in the near future and The Wards crossing could be one such crossing. When the recently agreed improvements to the Inverness / Aberdeen railway line are completed the frequency of rail traffic is expected to increase substantially. This is felt to be further justification for another railway crossing point. Elgin Community Council is pleased that the proposed railway bridge will be able to accommodate electrification of the line in the future.

Worthy also of consideration is a link to the Moray Economic Strategy. One of the Key Themes is : - *The need to improve the transport infrastructure and public transport services for greater connectivity within Moray and to external markets.* It is easily arguable that this development falls under this heading.

Elgin Community Council is aware that a number of people have different personal concerns and objections of one kind or another to the road being built. Members have sympathy with some of those concerns and do not dismiss them.

Some such concerns are around the following aspects:-

- Noise caused by the scheme in operation
- Pollution effects within the curtilage of properties
- Access to properties being hindered by the scheme
- Parking arrangements on Edgar Road
- Designing Streets policy not applied consistently throughout
- Road should not be a viable alternative to the A96

A Meeting of the City & Royal Burgh of Elgin Community Council was held in the
COUNCIL CHAMBERS on Tuesday 13th MAY 2014 at 7.00pm.

- Splay of roads adjoining – for turning speeds and passage of cyclist's
- Migration of deer to and from the wetlands

The actual material planning objections will be dealt with on an individual basis during consideration of the application. However, there is also a large majority which have made no representations. Members also understand that the planning system in use in Scotland asks for objections and thereby encourages opposition rather than support or approval.

Many of the objections seem to hinge on the costs of this road and whether these costs are justified in the current financial climate. Whether Elgin Community Council agrees or disagrees on the cost of the project, members' understanding is that capital and interest cost is not a material planning consideration and the final point for such deliberation was passed some time ago.

Five people have contacted Elgin Community Council asking for differing levels of support for their objections. Elgin Community Council represents the whole of the City of Elgin and members have had practically no representations of opposition to the route from other parts of Elgin despite conversing over the period with as many residents of these areas as possible and meetings being open to public attendance. We feel that we require reflecting the fact that there are objectors to the application but do not believe our role is to support individual objections.

Elgin Community Council realises the application must be decided on planning criteria alone and having examined the application, find no areas of relevant planning conditions that are felt require an official objection to be lodged. Elgin Community Council will not therefore be lodging objections to Planning Application 14/00551/APP - Site Linking A96(T) To Wittet Drive To Edgar Road Elgin Moray

Yours sincerely,

A G Kennedy (On behalf of The City & Royal Burgh of Elgin Community Council)

A Meeting of the City & Royal Burgh of Elgin Community Council was held in the
COUNCIL CHAMBERS on Tuesday 13th MAY 2014 at 7.00pm.