



Date: 28 September 2005

35 Main Street,
Newmill,
Keith, Banffshire
AB55 6UR

To: Planning and Development Section
Environmental Services Department
The Moray Council
Council Office
High Street
Elgin IV30 1BX

Dear Sirs,

Re: Moray Development Plan Review

On behalf of Moray FoE I submit the following as a response to the above review

Which plan?	Which Part? (policy/section)	Our View	Reasoning
LP	T1a	Remove priority to dualling the A96 between Aberdeen and Inverness, including bypasses at Elgin, Fochabers/Mosstodloch and Keith.	This will encourage long distance commuting and therefore result in environmental degradation and economic dependence on economies outwith Moray. Finances should instead be directed to establishing local economic infrastructure to negate to need for long distance commuting. Traffic studies show the vast majority of vehicular movements terminate in rather than go through Elgin so a bypass is unnecessary. Parking restrictions in Keith and Fochabers/Mostodloch would maintain the traffic flow without the need for the creation of a bypass.
LP	T1c	Include priority to develop a railway station in Lhanbryde.	To open up the possibility of greater commuting by public transport. The improvement of the railway infrastructure will allow an improved timetable to be offered to local residents.
LP	T1e	Include that improving access to air facilities should be done by public transport.	To enable an integrated sustainable approach to transportation to be developed.
LP	T7	Include that the Council will advance the creation of new footpaths and cyclepaths. Particularly in relation to the advancement of a sustainable transport infrastructure of linking workplace/school to residences.	To enable an integrated sustainable approach to transportation to be developed.

LP	TSP1	Against - The Bypass corridor (North option) will create too much environmental and ecological destruction.	Although the bypass is not needed at all, the route to the North of Elgin will pass too close to the SSSI at Quarry Wood. It would destroy the integrity of the oak woodland there and destroy the years of work to expand the oak woods.
LP	EP2	Include that space for the provision of recycling collection bins must be included in every application for new development of a single building.	To enable the pick up of recyclable materials from all households even if they have no service at present. This will help enable the provision of kerbside collection to be extended.
LP	ER1	Remove last two paragraphs.	The presumption against development in the 'unlikely areas' and the restricted area designated 'preferred', combined with no presumption in favour of development in these 'preferred' areas adds up to a presumption against the development of wind power in Moray. This is contrary to NPPG6 and PAN45.
SPG	Wind Energy	Against this document.	As above.
LP	ER2	Remove the words 'unless it can be satisfactorily demonstrated that such provision would be technically or economically unfeasible.' Include that the proposals would include redevelopment of existing buildings and take account of staggered development and single developments in a pro-rata basis.	To ensure developers include the provisions and that staggered development does not prevent the expansion of renewable energy generation on single new or redeveloped buildings.
LP	IMP1	Develop a SPG on sustainability in design, location and construction perhaps in line with Highland Council guidelines.	Sustainability in design, location and construction is too important to be given only one sentence. Assistance from the planning authorities on how this will be interpreted, implemented, and minimum use of sustainable material is necessary.

Yours

Rod Lovie
Secretary – Moray FoE