

Appendix 1 Responses to the revised draft Elgin South Masterplan public consultation

Body or person(s)	Summary of Response with required changes
Strategic Planning & Development	<p>Preface The draft masterplan has been subject to public consultation and will replace the previously adopted version in full once approved. Once approved it will solely provide the strategic framework for the masterplan area and for Development Management purposes. Paragraphs 2 and 3 must be updated to reflect this.</p> <p>Delete the first paragraph from the right hand column and to state that NPF4 is anticipated in Autumn 2021</p> <p>Introduction Paragraph 2 - delete phrase “if we are given the right support...”</p> <p>Page 4 & 5 – The masterplan must make reference to creating “inclusive communities”.</p> <p>Page 5 – Update the Stakeholder Engagement section to reflect the consultation.</p> <p>Policy Context Page 7 line 2 – Change “June” to “July”</p> <p>Page 7 – Revise to put placemaking in front of sustainable economic growth to read ‘The MLDP 2020 places placemaking, sustainable economic growth and infrastructure delivery at the centre of its aim’ as this reflects the order of the primary policies in the LDP.</p> <p>Page 9 Typo line 3</p> <p>4th and 5th line from end paragraph - delete “on shortly”.</p> <p>Last line - delete “recently” or delete all of the last line.</p> <p>Pages 12 & 13 Reference to a future retail/commercial hub in the Glassgreen area must be provided in this section. It will become a focal point and key component of the western village particularly with its proximity to the new school site.</p> <p>Page 14 Line 7 – typo “identified”.</p> <p>Last paragraph – This paragraph must be revised to say that that mitigation measures are identified and included in the masterplan.</p> <p>Page 15 Delete text - “we would like to...”</p> <p>Discussions with regards to the school strategy are still on going. However, the masterplan must be changed to state that the school may be required as early as 2026, subject to the outcomes of the current review of the School Estate Strategy</p> <p>Page 16 Update the diagram to show facilities outwith the masterplan area. This will help to show how the masterplan relates to the surrounding area and existing facilities.</p> <p>Page 16 & 17 These plans will have to be revised to address all of the comments in this table.</p> <p>Page 18 –Mix of Uses</p>

The number of key buildings identified on the plan suggests these are only those with commercial uses but there will be key buildings for residential use within each character area and their development blocks too (e.g. along key routes, around open spaces, terminating vistas, etc.). While residential key buildings will largely be determined when detailed designs are prepared the key must be changed to reflect that these are “non-residential” key buildings to avoid confusion.

While the text refers to these buildings being flexible for adaptation to residential which is welcomed in principle, the masterplan must be revised to clearly state that these buildings will be built for commercial uses first before residential uses could be considered.

Page 18 – Last sentence

In order to be a key building and provide distinctiveness these will need to incorporate the majority or if not all of these options to be ‘distinctive’ from the rest of the development and act as a “waymarker”. The text must either be amended to by changing ‘may’ to ‘will’ or *‘sufficient variation must be provided through a mix of these options in order that a key building(s) can be easily distinguished from other development in the immediate vicinity’*

Page 18

To ensure that adequate facilities are provided to serve the needs to the new neighbourhood as the wider masterplan area develops, the masterplan must identify a site in the west for future health centre provision so that an appropriate location is safeguarded.

The masterplan talks about landmark buildings however it must also reflect key nodes and points within individual character areas as well.

Page 19 -21 (Access & Connectivity)

This section must be amended to address all Transportation comments. This must provide more than just principles and set out all mitigation measures.

Page 22

As discussed clarity is required between residential and non-residential key buildings as the diagram shows non-residential “key buildings”. The key must be amended to “non-residential” key buildings to avoid confusion.

The text states ‘single storey houses are also present’. It is not clear from the plans where these are to be located particularly as the lower density and buildings height locations do not appear to match up.

Page 23

Lower residential range states 1-2 storey but medium residential range is 2 storey. This means that 2 storey could be built in both the blocks identified for lower and medium residential range resulting in no variation. Lower residential range either needs to show where single storey will be located or change to 1 – 1.5 storey to reflect difference between the areas. Similarly, higher residential range shows 2-3 storey so whole development could end up being 2 storey with no variation to provide distinctiveness.

Page 25

Line 4 - delete “generally”

An indication of numbers in each location must be provided to ascertain how big these ‘clusters’ are. These clusters appear to be quite large and affordable housing must be well integrated into the development as per Policy DP2.

Page 29

Central Park- This park will become a key feature of the masterplan area given its central position, proximity to the school, and Linkwood Burn. Outwith the arc park it will be one of the larger formal areas of open space and must be provided. Once provided, consideration could be given to a potential CAT or similar process. The text must state that this will be a formal neighbourhood park in terms of its function. Clearer trigger points as to when this will be delivered must be set out in the masterplan.

Page 30

Given the importance of the Central Park it must be brought forward into the 10-15 year phase.

The arc park must also be brought forward from the 20-25 year phase so the western elements complement the build out but is delivered before the completion of Glassgreen Village as it will become a key resource and connection for the community. Given the position with the school estate, shorter term solutions will involve pupils from the Glassgreen village attending other schools highlighting the need and importance for safe routes to school.

Page 31

The diagram provided only shows a series of SUDs pond with no indication that any other blue infrastructure ie swales, rain gardens will be incorporated into the development. The network of SUDS should be shown along with and incorporated into the green network/corridors. It must also be incorporated into the development blocks and not just in more formal areas of open space.

Page 32 & 33

More detail is required on how the public art across the masterplan area is to be delivered and must be clearly set out in the masterplan. In order to provide consistency across the masterplan area an overall concept will need to be developed, at a minimum for each village. It is also not clear from the plan provided why the specific locations have been provided. This detail needs to be explored further as public art in whatever form it takes could play an important role in wayfinding as well as adding visual interest.

Page 34 – Phasing

The Square and the new school will play an important role in the West Glassgreen village and will create a neighbourhood hub. Given that this will become a focal point with a mix of uses the masterplan must provide further detail in relation the phasing for the square, the campus, and the new enlarged school site to show how this important area will be developed cohesively.

Page 36

2nd Paragraph , Line 5 – Typo

Page 37

The Firview character area is large and will need to be broken down into smaller character areas to ensure that there is varied character within this significant area.

Design Concept Diagrams – Page 39 onwards

There is concern with the levels of open space and the locations within the wider Glassgreen Village. Some of the proposed areas seem small and a pocket park is on edge of arc park which seems a distance from houses on western boundary. More detail is required in terms of areas and function of the smaller green triangles and how this relates to green streets (i.e. green blue network through blocks) is required.

The masterplan text and diagrams refer to ‘green streets’ but it is not clear what this will comprise of. PP1 requires all streets to have trees and landscaping so it must be made clear in the masterplan what will make these streets different from the policy requirements.

Page 40

The yellow area in the middle diagram needs to explained in the key as it is not clear to the reader what this will be. See comments below about strengthening the he village core or neighbourhood hub concept.

For a development of this size the number of key buildings appears to be minimal.

The frontages diagrams on page 24 and 40 do not match up. This must be revised.

Page 43

The plan appears to show lots of traffic calming measures but reducing speed should be designed into the development and not through traffic calming measures. If these are being removed then the masterplan needs to set out how traffic calming is being addressed through design using images and diagrams as well as text.

Character Area Manual Page 46 onwards

The character areas palette concentrates on external finishes and soft landscaping but needs to show or include text explaining that to meet policy requirements there will be considerable variation within each character area and how that will be achieved.

This must include measures such as a wider variation of colour and finish materials, different elevation features/architectural details and treatments, and house types. Whilst colour palette shows variation, many of the stronger colours are in the planting which is not enough on its own. Variation needs to be in the colour palette for the houses and street surfaces as well. It could also provide details with regards to the key buildings that will be located within each area.

This would apply to all phases due to come forward by 2030 as we appreciate the need for further variation and different advances in design and materials in the longer term.

Page 49

Line 1 – Typo “an”

Paragraph 2 line 1 – Typo

	<p>Page 51 The village core or neighbourhood hub concept does not come out strongly enough in the masterplan or this section. In particular, the concept of locating a mix of uses in this area with a strong public realm. The masterplan must provide a neighbourhood centre which might over time include a number of retail and service units, café/ bar and possibly even the health centre co-located as a focal point of activity, with the potential for parking to be designed to support drop offs at the school.</p> <p>Page 63 “renewables section” line 3 - Typo</p> <p>Last paragraph line 1 – Typo</p> <p>School Site Text must be added to the masterplan to make clear that no development will be consented on the currently LDP designation until ground condition surveys have demonstrated the suitability of the new enlarged site to the Council’s satisfaction. The Masterplan should set out how and when the services school site will be delivered, working to an estimate of 2027 for the need for the school.</p>
<p>Moray Council Transportation</p>	<p>Page 5 Bilbohall site is not ‘stalled’.</p> <p>3rd para relocating school site to south may centre it for new development, however existing site is more centred for school catchment. Move will mean existing residential properties to north will be further away.</p> <p>4th para Public Transport provision needs to be mentioned as well as active travel</p> <p>Page 11 Key refers to ‘Railway Line in use’ however this is a disused railway line which has been safeguarded for the provision of an active travel corridor.</p> <p>Page 12 Focus is on new development with little emphasis on relationship to existing development and how the residents of those properties will be utilising the new facilities to be provided as part of this development.</p> <p>Page 13 Removing vehicular connections across pipeline reduces permeability. How will public transport routes be delivered such that all houses are within 400 metres of a bus stop?</p> <p>No clear proposals or reference to the need of safe crossing point of the A941 (derestricted road). Without a safe and suitable crossing at the ‘Arc Park’ and on other desire lines the A941 will be a barrier to movement.</p> <p>Page 14 Reference is made to there being details for measures to mitigate the crossing on the A941 in a later section of the document. There are no relevant details provided.</p> <p>The A941 is a derestricted road and the form of development and landscaping currently proposed does not support the reduction of this speed limit. Therefore grade separated crossing facilities for pedestrians and cyclists (an overbridge or subway) will be required.</p> <p>Page 15 The school catchments have not been identified. The extent of the school catchments will be required to enable an assessment to ensure that safe and suitable active travel routes for school pupils from the wider catchment are provided.</p> <p>Page 16 Retail and local facilities are concentrated on the eastern and western peripheries of the development – leaving the central area to the south of the ‘Arc Park’ travelling further distances to access the facilities. However the plan on the following page 17 shows shops and health facilities fronting onto the ‘Arc Park’ in Linkwood Village. This is one of many discrepancies between plans. We have not checked plans for consistency as this is the responsibility of the developer and their consultant team.</p> <p>Page 17 See annotated plan.</p>

Public transport is mentioned in passing but there are no details of how public transport will be provided throughout the development.

Page 19

See annotated plan.

Concerned that the level of detail on how roads will relate to development which was provided in the original Masterplan has been removed from this document, along with a lack of consideration of how public transport will be provided.

Page 20

2nd para. There have been complaints about the walking distances to take refuse collection to the public road for recent Springfield developments. This needs to be taken into account when developing the road network and refuse collection for the development.

4th para. Reference needs to be made here on how the Transport Appraisal will assist in identifying the timing of E-W connections throughout the site and to the wider area.

Why is there no reference to Linkwood Road? The upgrading of the road undertaken to date and the remaining upgrades?

9th para. The layout of development constructed to date and the proposals for the existing road corridors do not provide active development frontage with direct access which will slow vehicles. In particular Birnie Road whilst houses may 'front' onto the road they are at a higher or lower level to the road. This does not influence driver behaviour. It should also be noted that high fences have already been erected at a property(s) on this road frontage. Direct access to properties is required to influence driver behaviour and vehicle speeds.

Page 21

The piecemeal approach to development along Birnie Road and the associated changes to the road have led to a disjointed road layout with pinch points where heavy goods vehicles cannot safely pass other traffic. A design review is required for Birnie Road between the southern extent of the development, including the driving range access and proposed changes to the road which will be part of the A96 dualling scheme, and the roundabout at Sandy Road. A design speed will be identified and amendments made to ensure that the road can safely accommodate both the development and existing traffic, this made include but not be limited to the removal of pinch points, bend widening and realignment of kerbs to provide a smooth transition between previously widened sections of the road.

Further details are required on the proposals for the Active Travel crossing points of the existing roads, in particular the A941 which is subject to the national speed limit.

3rd para. The desire to eliminate vehicular crossings of the gas pipeline has led to there being two road crossings of the north-south active travel route through Linkwood Village. The original Masterplan sought to prioritise this active travel route over vehicles. This appears to have been forgotten in favour of the 'Arc Park'. A recommitment to prioritising pedestrians and cyclists using the north-south route over vehicles is required through the provision of grade separated (bridge or underpass) or other special measures to provide a priority without delay to pedestrians/cyclists.

There is a lack of detail or consideration of public transport provision in this section. Public transport is required to connect to the wider destinations in Elgin and provide for those with mobility impairments/young families. A plan showing the proposed public transport route and how the development will be within 400 metres of this route is required within the masterplan.

Page 24

The difference between buildings facing onto a road and actually fronting onto a road (i.e. providing direct vehicular access) needs to be made within this section. Building simply facing onto the road will not influence driver behaviour and reducing speeds to the same extent as buildings with direct accesses.

Page 25

Affordable housing should be sited near public transport corridors. It is not clear that this is being delivered as there is no clear indication within the document as to where a public transport route will be provided.

Page 26

Reference needs to be made to the provision of EV charging facilities as part of the Parking Strategy. No details of cycle parking provision. Again the principles for cycle parking need to be set out – refer to the MLDP guidance documents for details of requirements.

Page 29

The proposed greenside road corridors will not support speed reductions on the A941, Linkwood Road or Birnie Road, as highlighted in comments for the previous Masterplan.

Page 30

Proposed phasing and timescales for landscaping proposals is interesting. However similar phasing plans are required for the provision of the road, public transport, cycle and pedestrian networks to ensure that continuous safe routes are provided to local facilities as housing parcels are completed.

Page 31

Details of proposals for SUDs maintenance regime and responsibilities is required – particularly in the light of the proposal for landscaping made in para 2 on Page 29.

Page 34

As page 30 above, phasing for transportation network is required.

Page 39

Key vehicle route has a number of turns and is different from route shown on Page 45 and elsewhere in the document.

A key vehicle route is shown to the north connecting to The Range/Duncansfield. This contradicts the proposals shown on Page 45.

These inconsistencies between the drawings make providing effective comments difficult.

Page 43

See annotated plan.

Noted that 'traffic calming' measures and at-grade pedestrian/cycle crossing measures are proposed for the A941. This road is subject to the national speed limit and to date the proposals do not support a reduction in this limit. Therefore all crossing facilities need to be grade-separated.

Page 44

See annotated plan.

Reference must be made to the provision of cycle parking facilities to Parking Standards and MLDP guidance.

It is unclear if the 'Street Cycle Routes' shown on the plan are on-street or the 3 metre cycle paths referred to in the text.

Again cycle routes are shown up to and crossing the A941 with no details. See previous comments on speed of road.

Page 45

No details of how buses will move through the development.

There is a risk of heavy goods vehicles and other traffic travelling to Birnie Road from the A941 and vice-versa. How will that be deterred whilst still enabling public transport access?

Secondary routes are shown into Driving Range? But no connection to employment land to the south where residents may be working. Employees may wish to make use of local facilities at lunchtime/on way to/from work.

Long shared driveways have led to recent complaints about refuse collection.

Page 46

South Glassgreen – current proposals will not be prominent enough to enable reduction of speed limit on A941.

Page 61

Connections diagram shows a 'key safe route' alongside the A941? And a 'green network' on the eastern side of the road which may be used as a travel corridor. What are the proposals for active travel along the A941 corridor to provide linkage to the south (future employment) and bus stops on the A941?

Page 65

Para. 7 note the reference to working together to deliver active travel infrastructure and behaviour change. Details of your proposals are required, including off site provision and upgrades of active travel infrastructure.

Page 66

EV charging is mentioned on this page in passing. However more details and a greater commitment needs to be provided within the Masterplan update.

General

The choice of colours used to annotate features on plans has made them difficult to read and fully understand the information being conveyed. Colour choices for public facing documents should always ensure that there is clear legibility to support readers with visual impairments.

<p>Moray Council Access Manager</p>	<p>Support the proposal to reduce the number of roads in the overall layout and the enlarged 'ark park' reinforcing its role as a key active travel corridor.</p> <p>Request an additional link the north via a new bridge across the Linkwood Burn with a new path section provided to join Core Path EG60 which is a cycle route. This link will add value to the safe route to schools network on P16. This link would fill a gap in the path network on P20 by providing better connections to the core path network and create better active travel connections.</p> <p>There is further justification for this new link to be created to add value to the safe routes network identified on page 16 for Linkwood Primary School. The paths network shown on page 20 clearly demonstrates how adding this link would fill a network 'gap' by accommodating much better linkage to the Core Paths network to the north creating better active travel options to encourage people to get out of their vehicles. I ask that this link be shown on Pages 16 and 20 of the document.</p> <p>Show link via new bridge across Linkwood Burn connecting into the wider path network on Pages 16 & 20.</p>
<p>Moray Council Land & Parks</p>	<p>Open Space Maintenance –confirmation that private developer(s)/residents via factor or management companies will be responsible for maintaining open spaces and/or identify any public open spaces to be managed / maintained by the Council in the future.</p> <p>Play equipment - should be installed to British Standards BSEN1176 and 1177 and have an inspection and maintenance schedule carried out by the maintenance team/developers.</p> <p>Cemetery - cemetery design scoping paper has referenced South Elgin MP to ensure linkages and fit to development proposal. Wayfinding across the masterplan must include the new cemetery</p>
<p>Regional Archaeologist</p>	<p>Welcome the commitment to draw design inspiration from several historic local planned towns and village helping to embed the new development into the wider landscape setting of NE Scotland. Particularly Easter Linkwood which draws upon the more traditional layout style consistent with historic planning in Moray and North East Scotland reflecting the successful design elements of the 19th century 'planned villages'.</p> <p>Support the specific reference to wayfinding and public art within the Masterplan, but would like to see emphasis not only on natural environment but also the historic as this offers many opportunities for presenting the history and heritage of the area in new and engaging ways.</p> <p>Welcome the recognition that the former railway line will be a key active travel route that aids not only access and connectivity for the new development, but also facilitates improved health and wellbeing for residents.</p> <p>Reference should be included in the Masterplan to retention, repair and reuse of historic buildings where possible, which would support the emerging policy direction of NPF4. Such a reference could be included within the general Character Area Manual (Section 7), and page 66 'Climate Change and Resilience Adaptation.'</p> <p>Page 3, column 2, last line – change "...opportunities with also..." to "...opportunities will also..."</p>
<p>NatureScot</p>	<p>Encourage ambitious thinking when it comes to preparing wildlife enhancement plans for each character area. Wildlife enhancements in each character area should aim to complement that of their neighbour's to improve connectivity through the wider masterplan area.</p> <p>Achieving a mix of colour and diversity throughout the year with a clever choice of plants and man-made materials can help encourage folk outdoors when fresh air, light and nature can help our health and well-being when it's most needed in the winter months. Wetlands (including SUDS ponds) can be attractive during winter months. Shelter offered by trees, drystone walling and hedging can make a windy winter's walk or cycle more pleasant and offer the same benefit for wildlife.</p> <p>No changes Required</p>
<p>Scottish Water</p>	<p>No specific comments relating to the masterplan. Applicants must contact Scottish Water before submitting detailed planning applications.</p> <p>No changes required</p>
<p>SEPA</p>	<p>Happy with the masterplan updates and its ambitions to create a successful and sustainable place.</p> <p>Opportunities for an environmental scheme which contributes to the improvement of the Linkwood Burn. This should be considered as part of proposed developments especially for areas within the masterplan site where the Linkwood Burn is within or adjacent to.</p> <p>There should be a strategic approach to surface water management throughout the masterplan area, developing a blue/green corridor with measures that comply with the principles of the CIRIA C753 Manual.</p>

	<p>Request that the flood extents in the vicinity of the disused railway embankment are further investigated as the floodplain in this location looks to be influenced by the presence of this structure which is acting as a barrier to floodplain flows by way of an informal flood prevention measure.</p> <p>No changes required</p>
SGN	No objection/changes required.
Transport Scotland	<p>Support the planning objective to provide supplementary guidance in the form of an approved Masterplan to assist the delivery of the development Phasing within the Elgin South Masterplan Area. There is a lack of information relating to the transport modelling which limits the ability to comment fully. It is considered this information should have been included within the Masterplan. Transport Scotland cannot comment fully on the Masterplan proposals until this information is known.</p> <p>Welcome that an update to the Masterplan is being undertaken to reflect the new Moray Local Development Plan approved in July 2020, to reflect a number of site constraints that have been identified since May 2017 and to reflect the route chosen for the Hardmuir to Fochabers A96 Dualling and the inclusion of the Elgin South Interchange junction.</p> <p>Note that the phasing and delivery of the road linkages associated with the updated Elgin South Masterplan will be informed by a detailed traffic modelling exercise which considers vehicle movements in the wider Elgin area and the future connection to the A96(T) Interchange. It is disappointing to note that this modelling exercise has not been completed to coincide with the consultation on the Masterplan. This limits Transport Scotland's ability to meaningfully comment on the exercise being undertaken and we consider that this lack of information renders the consultation premature in respect to understanding wider traffic impacts and their potential mitigation.</p> <p>Welcome the inclusion of the 20 minute neighbourhood concept and references to promoting sustainable modes of travel and providing active travel links for walking, cycling and wheeling.</p>