

MORAY COUNCIL

**MINUTE OF MEETING OF THE PLANNING AND REGULATORY SERVICES
COMMITTEE**

21 MAY 2019

COUNCIL CHAMBERS, ELGIN

PRESENT

Councillors Bremner (Chair), Taylor (Depute), Alexander, Cowie, Coy, Divers, Feaver, Laing, Macrae, A McLean and R McLean.

APOLOGIES

Apologies were intimated on behalf of Councillors Cowe and Edwards.

IN ATTENDANCE

The Head of Development Services, Development Management and Building Standards Manager, Legal Services Manager, Mr MacPherson, Principal Planning Officer, Mr Smith, Principal Planning Officer, Mr Templeton, Principal Planning Officer, Mrs Anderson, Senior Engineer Transport Development, Ms MacDougall, Planning Officer and Mrs Rowan Committee Services Officer as Clerk to the Committee.

1. DECLARATION OF GROUP DECISIONS AND MEMBERS INTERESTS

In terms of Standing Order 20 and the Councillors' Code of Conduct, there were no declarations from Group Leaders or Spokespersons in regard to any prior decisions taken on how Members will vote on any item on the agenda or any declarations of Member's interests in respect of any item on the agenda.

**2. MINUTE OF THE PLANNING AND REGULATORY SERVICES COMMITTEE
DATED 26 MARCH 2019**

The minute of the meeting of the Planning and Regulatory Services Committee dated 26 March 2019 was submitted and approved.

3. WRITTEN QUESTIONS

The Committee noted that no written questions had been submitted.

4. PLANNING APPLICATION 19/00100/APP

Ward 5: Heldon and Laich

Application under Section 42 to vary conditions 1, 3, 4, 5, 7, 8, 9, 10, 26, 27, 28, 30 and 31 of planning consent 14/01486/APP altering the phasing plans delivery of affordable units (increased by 2 units) delivery of accessible units (increased by 1 unit) site layout details (altering the position of a SUDS basin landscaping and access/footpaths) which increases the total number of residential units to 265 (from 261) at R1 Sunbank Lossiemouth Moray for Tulloch Of Cummingston Ltd

A report by the Appointed Officer recommended that, for reasons detailed in the report, planning permission be granted in respect of an application under Section 42 to vary conditions 1, 3, 4, 5, 7, 8, 9, 10, 26, 27, 28, 30 and 31 of planning consent 14/01486/APP altering the phasing plans delivery of affordable units (increased by 2 units) delivery of accessible units (increased by 1 unit) site layout details (altering the position of a SUDS basin landscaping and access/footpaths) which increases the total number of residential units to 265 (from 261) at R1 Sunbank Lossiemouth Moray for Tulloch Of Cummingston Ltd.

The Meeting noted that the application had been referred to Committee in terms of the Scheme of Delegation as the application is a major development with more than 50 houses, and the site area exceeds 2ha. The report also advised that Members of the Committee visited the site of the application on 17 May 2019.

During discussion surrounding the SUDS basins located on the site, whilst it was recognised that the basins were necessary to prevent flooding, concern was raised that they were being included in the 31% green space requirement for each development as they were not accessible green space.

In response, Mr MacPherson, Principal Planning Officer advised that SUDS basins are classed as green space and are usually encouraged to be landscaped as such however as the site is near to the RAF base, the Applicant had been encouraged to make the SUDS basins less habitable for birds by making them dry so as not to attract too many birds. This was in line with guidance from the Civil Aviation Authority.

Councillor Feaver acknowledged that the application was to vary several conditions in the original planning application however with regard to the repositioning of the SUDS basin in phase 1 moved that underground tanking be carried out and covered as an open space so that it would form open green space and be accessible and multifunctional in line with current planning policy.

The Development Management and Building Standards Manager advised that the planning application before the Committee was to vary conditions to the original application and amend the layout that had already been approved. She further advised that the application had been consulted upon with the Ministry of Defence (MOD) who had raised no objection to the proposals and that if the Committee were minded to suggest a change in the design to the SUDS basins, that would require further consultation with SEPA, the Flood Team and the MOD.

Following consideration of the advice from Officers, Councillor Feaver agreed to withdraw her motion however asked that future planning applications ensure that

engineering SUDS works are not included in the open space allocation for each development as they were not accessible open green space.

In response, the Head of Development Services advised that, whilst he appreciated Councillor Feaver's opinion in terms of open green space in developments, in terms of current planning policy blue/green space should be delivered in the context of the site and that this development was constrained due to bird issue highlighted by the MOD.

Thereafter, the Committee agreed to grant planning permission in respect of Planning Application 18/01561/APP as recommended subject to:

- (i) a variation to the existing Section 75 legal agreement for Sunbank 14/01486/APP; and
 - (ii) the following conditions and reasons subject to an amendment to condition 25 which should refer to phase 5b instead of phases 6 and 7.
1. As part of the permission hereby granted, the 74 affordable house units (as identified on the 02 Phasing Plan Version J) shall only be used for affordable housing purposes in accordance with the agreement(s) reached between the applicant/developer and Moray Council and/or any registered social landlord to enable the long term delivery of affordable housing on this site; and no house development shall commence beyond Phase 2 until details of the agreement(s) to confirm the arrangements for the delivery of the proposed affordable house units hereby approved shall be submitted to and approved in writing by the Council as Planning Authority. Thereafter, the development shall be implemented in accordance with the approved details.

Reason - To ensure an acceptable form of development in terms of the required provision and delivery of the affordable housing units proposed for this site wherein the benefits of such provision are passed on to serve the community in future years.

2. No works shall take place within the development site until the developer has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted by the applicant, agreed by the Aberdeenshire Council Archaeology Service, and approved by the Moray Council (as Planning Authority). Thereafter the developer shall ensure that the programme of archaeological works is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken to the satisfaction of the Planning Authority in agreement with the Aberdeenshire Council Archaeology Service.

Reason - To safeguard and record the archaeological potential of the site.

3. Prior to the commencement of works a detailed plan of public access across the site (during construction and upon completion) must be submitted to and approved by the Council (as Planning Authority) in consultation with the Moray Access Manager. This must show:

- a) Details of any existing paths within the site;

- b) Any areas proposed for exclusion from statutory access rights, for reasons of privacy, disturbance or curtilage, in relation to proposed buildings or structures;
- c) All paths and tracks proposed for construction, for use by walkers, riders, cyclists, all ability users, etc. inclusive of the proposed link from the site towards Lossiemouth High School;
- d) Any diversions or paths - temporary or permanent - proposed for the purposes of the development and;
- e) Details of how public access and movement through the site will occur between the different approved Phases 1 - 11 of the development.

The development must thereafter be carried out strictly in accordance with the approved public access plan unless otherwise agreed in writing with the Council as Planning Authority.

Reason - In order to ensure public access is maintained during and after the construction period.

4. Acoustically attenuated trickle ventilators shall be provided in the western, northern and southern elevations of lounge and bedroom apartments on plots 1 to 16, 81 to 93, and 94 to 98. They should have an element normalised level difference $D_{n,e}$ of at least 39dB in the 500Hz octave band. If two trickle ventilators are to be installed in a given room, the $D_{n,e}$ should be 42dB, and should four trickle ventilators be installed the $D_{n,e}$ should be 45dB, as stated in accordance with Section 4.12 of the noise impact assessment supporting document dated 28th January 2018, titled "Report on Air Traffic Noise For Tulloch of Cummingston At Sunbank, Lossiemouth, Moray" and provided by Charlie

Fleming Associates Limited, Acoustic Consultants, 5 Saltpans, Charlestown, Fife KY11 3EB

The above mitigation, in combination with the overall building insulation, shall ensure that internal noise levels in the lounge and bedroom apartments at the development associated with external aircraft noise shall not exceed a sound pressure level L_{Aeq16h} (0700 to 2300 hours) of 35 dB, as determined with windows closed and trickle ventilators open.

Reason - In order to ensure adequate noise insulation is provided for residences closest to the airbase.

5. Unless otherwise agreed in writing with the Council (as Planning Authority), double glazed external windows installed in the western, northern and southern elevations of lounge and bedroom apartments on plots 1 to 16, 81 to 93, and 94 to 98 shall consist of 4mm and 8mm thick panes of normal float glass separated by a 12mm cavity. The specification and acoustic performance shall be in accordance with Section 4.13 of the noise impact assessment supporting document dated 28th January 2018, titled "Report on Air Traffic Noise For Tulloch of Cummingston At Sunbank, Lossiemouth, Moray", and provided by Charlie Fleming Associates Limited, Acoustic Consultants, 5 Saltpans, Charlestown, Fife KY11 3EB.

Reason - In order to ensure adequate noise insulation is provided for residences closest to the airbase.

6. Beyond the noise insulation requirements specified in conditions 4 and 5 above, prior to development commencing a further scheme of aircraft noise mitigation for the residences and commercial units must be submitted to and approved by the Council as Planning Authority (in consultation with the Ministry of Defence) incorporating the following noise insulation measures in all buildings:-
- a) Acoustic lagging in the roof space,
 - b) Installation of an acoustic double glazing system which should be at least 6.4mm PVB (polyvinyl butyral) laminated for individual panes (12- 10mm together),
 - c) Installation of sound attenuating ventilation units (to provide a fresh air flow to the property whilst allowing the glazing to remain closed and provide maximum attenuation of the noise).

The development must thereafter be carried out strictly in accordance with the scheme of aircraft noise mitigation approved and be retained in perpetuity.

Reason - In order to ensure adequate noise insulation is provided for residences closest to the airbase.

7. Prior to the commencement of development a scaled plan (1:100) must be submitted for approval by the Council as Planning Authority in consultation with the Roads Authority which details the parking provision and allocation of spaces in accordance with Moray Council Parking Standards (including disabled, motorcycle and cycle parking provision) for the retail units and also details of the provision for deliveries and servicing of the retail units. The approved parking/access arrangements shall then be provided prior to any of the retail units coming into operation.

Reason - To ensure acceptable form of development and confirmation of parking and servicing arrangements.

8. The development shall be completed in accordance with the approved phasing plans (Drawings 02 Phasing Plan Rev J) unless otherwise agreed in writing with the Council as Planning Authority.

Reason - To ensure vehicular access is provided in accordance with phasing to ensure adequate servicing of the development.

9. No more than 24 housing units (4 existing + 20 new) in Phase 1 shall take access from Fisher Place until the approved access is provided from the B9135 and a connection has been made and opened to the public between the B9135 and Phases 1 and 2 as shown on Drawing 02 Phasing Plan Rev J.

Reason - To ensure vehicular access is provided in accordance with phasing to ensure adequate servicing of the development.

10. No more than 23 housing units (5 existing + 18 new) in Phase 2 shall take access from Halliman Way until the approved access is provided from the B9135 and a connection has been made and opened to the public between B9135 as shown on Drawing 02 Phasing Plan Rev J.

Reason - To ensure vehicular access is provided in accordance with phasing to ensure adequate servicing of the development.

11. Phase 1 and Phase 2 of the development shall not be connected via the proposed development site roads until the approved access is provided from the B9135 and a connection has been made and opened to the public between the B9135 as shown on Drawing 02 Phasing Plan Rev J.

Reason - To ensure vehicular access is provided in accordance with phasing to ensure adequate servicing of the development.

12. Prior to commencement of construction on the 6th housing unit within Phase 1 the improvement works identified on plans at the junction of Coularbank Road with the A941 shall be completed to the satisfaction of the Council as Planning Authority in consultation with the Roads Authority.

Reason - In the interests of road capacity and the provision of off-site infrastructure required to support the development.

13. No part of the development taking access from the B9135 shall be connected to Boyd Anderson Drive via either Halliman Way or Fisher Place until evidence has been provided that the statutory process for the implementation of traffic calming on Boyd Anderson Drive has been concluded and any works required have been approved and delivered to the satisfaction of Council as Planning Authority in consultation with the Roads Authority.

Reason - To ensure acceptable development in the interests of road safety.

14. Construction traffic movements within the site shall accord with the principles set out within the approved Construction Traffic Management Plan unless agreed otherwise in writing with the Council as Planning Authority in consultation with the Roads Authority.

Reason - In the interests of road safety for all road users.

15. No boundary fences, hedges, walls or any other obstruction whatsoever over 1.0m in height and fronting onto the public road shall be within 2.4m of the edge of the carriageway.

Reason - To ensure acceptable development in the interests of road safety.

16. Parking provision shall be provided in accordance with Moray Council Parking Standards as follows:

- a) 2 spaces up to 3 bedrooms
- b) 3 spaces for 4 or more bedrooms
- c) 1.5 spaces per flat (Private up to 2 bedrooms)
- d) 1 space per flat (Affordable up to 2 bedrooms)

Reason - To ensure there is acceptable parking provision within the development.

17. New boundary walls/fences shall be set back from the edge of the public carriageway at a distance of 2.0m.

Reason - To ensure an acceptable form of development, safeguarding the public road in the interests of road safety.

18. Housing units requiring 2 or more parking spaces shall have a driveway length of 6.0m minimum in front of any garage to permit a second car to park, unless alternative parking arrangements are submitted to and given prior written approval by the Council as Planning Authority (in consultation with Roads Authority). No part of the driveway shall be included in the public road.

Reason - To ensure an acceptable form of development.

19. Off-Street parking provision shall be outwith visibility splays.

Reason - To ensure acceptable development in the interests of road safety.

20. Driveways over service verges shall be constructed to accommodate vehicles and shall be surfaced with bituminous macadam.

Reason - To ensure an acceptable form of development.

21. Unless otherwise agreed with the Council as Planning Authority prior to commencement of development, the developer shall provide to the Council as Planning Authority:

- a) Acceptance in writing from Scottish Water that they shall adopt and maintain the surface water sewers and detention basins.
- b) Acceptance in writing from The Moray Council as Roads Authority that they shall adopt and maintain the roadside filtration trenches.

Reason - To ensure the surface water assets are properly maintained to an acceptable standard and to clarify where responsibility for them lies.

22. Unless otherwise agreed in writing with the Moray Council (in consultation with SEPA):-

- a) A minimum 600mm freeboard is maintained between the 1 in 200 year plus climate change water level and finished floor levels (unless otherwise agreed by the Moray Flood Risk Management Team).
- b) Watercourse crossings are appropriately designed to be able to convey the 1 in 200 years plus climate change flow without increasing flood risk elsewhere.
- c) If applicable, further information is submitted to and approved by the Moray Council (in consultation with SEPA) to demonstrate that any re-profiling of watercourse banks, or land adjacent to the banks, would not increase flood risk elsewhere.

Reason - To protect people and property from flood risk.

23. No development shall commence on site until a site specific Construction and Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the Council as Planning Authority in consultation with SEPA (and SNH or other agencies as appropriate). All works on site must be undertaken in accordance with the approved CEMP unless otherwise agreed in writing with the Council as Planning Authority.

Reason - In order to minimise the impacts of necessary demolition/construction works on the environment.

24. No development shall commence until details of arrangements for the time-scale(s) for all new planting to be undertaken together with the arrangements for the long term maintenance of all proposed landscaping arrangements have been submitted to and approved by the Council as Planning Authority. Thereafter, the landscaping planting arrangements and maintenance arrangements shall be carried out in accordance with the approved details.

Reason - In order that detailed consideration can be given to the landscaping arrangements and to ensure ongoing maintenance is in place for the landscaped areas of the site.

25. In relation to the approved Landscape Scheme details, any trees or shrubs which (within a period of 5 years from the planting) die, are removed or become seriously damaged or diseased shall be replaced in the following planting season with others of similar size, number and species unless this Council as Planning Authority gives written consent to any variation of this planning condition.

Reason - In order to ensure that the approved landscaping works are timeously carried out and properly maintained in a manner which will not adversely affect the development or amenity and character of the area.

26. Prior to the commencement of development, details of an equipped play area (as identified within the Phase 5b of the approved Phasing Plan) including the means of separation from vehicular traffic and provision and maintenance arrangements shall be submitted for the written approval of the Council as Planning Authority. The equipped play area shall be completed and available for use prior to the occupation of the first housing unit in Phase 5b. All work shall be carried out in accordance with the approved details.

Reason - To ensure the adequate provision of an equipped play area in line with Moray Council Supplementary Planning Guidance - Developer Requirements for Housing.

27. Unless otherwise agreed in writing with the Council as Planning Authority (in consultation with the Ministry of Defence) for plots 77-93 and 119-130 no roof mounted or ground based solar panels, metallic superstructures, metal roof cladding or metallic garage doors shall be permitted on any of the dwellings or upon any outbuildings within these plots. Permitted development rights relating to extensions, outbuildings and domestic renewable energy equipment for the above plots is hereby removed.

Therefore, notwithstanding the provisions of the Town and Country Planning (General Permitted Development)(Scotland) Order 2011 (or any order revoking or modifying that order) no development specified in Schedule 1, Parts 1, 1A and 1ZA, within Classes 1, 2B, 3A, 3B, 4A, 6A, 6B shall be carried out without the prior approval of the Council as Planning Authority.

This restriction shall similarly apply to any future change or modification of the development types covered by the above specified Permitted Development Classes.

Reason - To ensure that no permitted development occurs within the affected plots (identified above), which may cause a distraction or hindrance to aircraft or air traffic control, in the interests of National Security.

28. The 20 housing units agreed and designated as the 'Accessible' units as defined in Moray Local Development Plan 2015 Supplementary Guidance - Accessible Housing shall remain as 'accessible' housing unless the prior written consent of the Council as Planning Authority in consultation with the Moray Council Head of Housing & Property has been granted.

Reason - To ensure an acceptable form of development in terms of the delivery of housing mix and provision of accessible housing.

29. The use of the four retail units identified within Phase 9 of the development shall relate to Class 1 Shops as defined under the Town and Country Planning (Use Classes)(Scotland) Order 1997 as amended and for no other purpose without the prior written agreement of the Council (as Planning Authority).

Reason - In order to avoid any ambiguity regarding the terms of this consent.

30. The surface water drainage system must be provided in accordance with the revised Drainage Impact Assessment (dated August 2017 rev B). The pertinent sections of the 2015 Drainage Impact Assessment and Flood Risk Assessment relevant to flooding remain in force under planning approval 14/01496/APP.

Reason - In order to ensure that surface water is appropriately managed.

31. Prior to any development commencing, the following details must be submitted to and approved in writing by the Council as Planning Authority (in consultation with the Ministry of Defence);-

- a) Specific landscaping and maintenance arrangements further to the submitted 'Landscaping' 06 Rev C must be submitted showing the use of and precise position of indigenous, non-fruit bearing tree species such as Birch, Hazel, Alder, Wych Elm or Scots Pine. Details must include the specific maintenance programme of keeping the height of trees to a height below 10m above ground level for the duration of their existence. These further landscaping details must be follow the guidance contained within the Civil Aviation Authority Advice Note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design'.
- b) Confirmation of landscaping arrangements surrounding the detention ponds which must be managed cut grass or hard surfacing so as not to encourage the use of the basins by birds during any periods when they are holding water. The design of the basins must also ensure that flow rates allow the basins to empty within 48 hours following any periods of high rainfall, thereby minimising the period where birds could land on the water. The management and maintenance of the Surface Water Sustainable Urban Drainage Scheme (SUDS) must be follow the guidance contained within the Civil Aviation Authority Advice Note 6 'Potential Bird Hazards from Sustainable Urban Drainage Schemes (SUDS)'.

Reason - To avoid endangering the safe movement of aircraft and the operation of RAF Lossiemouth through the attraction of birds and an increase in the bird hazard risk of the application site.

32. No construction traffic shall access the site from Boyd Anderson Drive.

Reason - To protect the residential amenity of neighbouring properties.

5. ELECTRICITY ACT 1989 (AS AMENDED) SECTION 37 CONSULTATION FOR THE PROPOSED NORTH EAST 400KV OVERHEAD LINE REINFORCEMENT BETWEEN BLACKHILLOCK, PETERHEAD AND KINTORE ELECTRICITY SUBSTATIONS, AND RECONFIGURATION OF THE OVERHEAD LINE AT KEITH FOR SCOTTISH HYDRO ELECTRIC TRANSMISSION PLC

A report by the Corporate Director (Economic Development, Planning and Infrastructure) asked the Committee to consider a proposed response to a consultation request from the Scottish Government Energy Consents Unit (SGECU) regarding a Section 37 application and accompanying Environmental Impact Assessment Report (EIAR) for consent to construct and operate a 400 kilovolt overhead line (OHL) reinforcement between Blackhillock, Peterhead and Kintore substations, and reconfigure a section of the existing OHL on the outskirts of Keith.

Following consideration, the Committee agreed:

- (i) to note the contents of the report including the conclusions made regarding the planning merits of the development, as detailed in Section 3;
- (ii) where taking into account the Moray Local Development Plan (MLDP) 2015 and all relevant material considerations, Moray Council raises no objection to the Section 37 application, subject to the conditions set out in Appendix 1 of the report; and
- (iii) to instruct the Head of Development Services to advise the Energy Consents Unit of the decision of this Committee.

6. MORAY EMPLOYMENT LAND AUDIT 2019

A report by the Corporate Director (Economic Development, Planning and Infrastructure) informed the Committee of the key findings of the Moray Employment Land Audit 2019 and asked that the audit be agreed. The report stated that the audit identified that there is 79.84 hectares (net) of marketable/effective employment land, of which 39.15 hectares (net) is immediately available.

The Committee joined the Chair in congratulating Officers for the work undertaken to achieve the results detailed within the audit report and thereafter agreed:

- (i) to note the employment land supply in Moray, as summarised in Section 4 and Appendix 1 of the report; and
- (ii) the finalised Moray Employment Land Audit 2019 as set out in Appendix 2 of the report.

7. HOUSING LAND AUDIT 2019

A report by the Corporate Director (Economic Development, Planning and Infrastructure) summarised the housing land supply situation in Moray and asked the Committee to agree the final version of the Moray Housing Land Audit 2019. The report stated that the audit identified that there is a 7.8 year effective supply of housing land with a total 23 year established land supply in Moray.

During his introduction, Mr Templeton, Principal Planning Officer pointed out a typo in the report at paragraph 4.4 which read “identified in the HNDA of 12,387” which should read “identified in the HNDA of 538 units”. This was noted.

The Committee joined the Chair in congratulating Officers for the work undertaken to achieve the results detailed within the audit report and thereafter agreed:

- (i) to note the housing land supply in Moray; and
- (ii) the finalised Moray Housing Land Audit 2019 as set out in Appendix 1 of the report.

8. CONFIRMATION OF STOPPING-UP OF SECTION OF U123E MOSS OF BARMUCKITY ROAD, ELGIN

A report by the Head of Legal and Democratic Services asked the Committee to confirm, as an unopposed Order, “The Moray Council (Section of U123E Moss of Barmuckity Road - Stopping-Up) Order 2018.”

Following consideration, the Committee agreed to confirm as an unopposed Order, “The Moray Council (Section of U123E Moss of Barmuckity Road - Stopping-Up) Order 2018” and instructed the Head of Legal and Democratic Services to make the Order.

9. DEVELOPMENT SERVICES PERFORMANCE REPORT – HALF YEAR TO MARCH 2019

A report by the Corporate Director (Economic Development, Planning and Infrastructure) inform the Committee of performance of the service for the period from 1 October 2018 to 31 March 2019. The report stated that, at the end of the reporting period, 93% of the performance indicators showed good performance and the 2018/22 Service Plan was 85% complete.

Following consideration, the Committee welcomed the good performance as indicated in the report and thereafter agreed to note:

- (i) performance against Planning and Regulatory performance indicators; Service Plan; and Complaints to the end of March 2019 as outlined; and
- (ii) the actions being taken to improve performance where required.

10. QUESTION TIME

Councillor Aaron McLean stated that he had become aware of an incident in Midlothian Council where 2 Labour Councillors had been suspended by the Standards Commission for speaking with a constituent in relation to a planning application. He further stated that, in a demonstration of support for the 2 Councillors involved, 10 other Councillors had walked out of the Planning Committee as they were of the view that the 2 Councillors in question had been treated unfairly by the Standards Commission. Councillor McLean stated that Members were often approached by constituents either via email, Community Council meetings or Councillor Surgeries in relation to planning matters and asked if Legal Services could provide guidance to Elected Members in this regard.

In response, the Legal Services Manager advised that this incident had recently been brought to the attention of Legal Services and that the Head of Legal and Democratic Services was trying to get further detail. She advised that there appeared to be more to the incident in that the Councillors involved appear to have suggested modifications to the planning application based on the concerns of the objector however was of the understanding that the 2 Councillors in question were planning to appeal against the suspension. The Legal Services Manager advised that further guidance would be arranged in due course and that, whilst there was a protocol in place for Planning and Regulatory Site Visits, there had been some issues surrounding Moray Local Review Body site visits, therefore it was her intention to submit a report to a future meeting of Moray Council in this regard.