

Response Reference	Name	Comments	Moray Council Response	Proposed Change to Masterplan
Support for Masterplan				
MSMP001	Tom Andryszewski	<p>Welcome the masterplan. The plan should include more places to work including more retail around the “strengthened” village centre and expansion of the industrial to the north of the village. This will help reduce the need to commute.</p> <p>Important that development provides a sense of place around a central meeting point. Important that the new housing to the south of the bypass are not disconnected from the rest of the village and pedestrian access to the school and shops will be paramount.</p>	<p>Support for the masterplan including the key elements of strengthening the village centre and expansion of employment land are noted.</p> <p>Policies within NPF4 and Moray Local Development Plan 2020 require development to contribute to creating a sense of place. However, this could be further acknowledged on page 51 under the heading of “Village Centre” by stating that opportunities must be designed to help to create a strong sense of place and identity.</p> <p>The designation of the MU LONG 1 (to the south of the A96) site in MLDP2020 has requirements for cycle paths and improvement to provide safe routes to the school and local shops. The connection to/from the housing to the south of the A96 to the rest of the village will be a key consideration for the masterplan that requires to be developed for that site.</p>	Text added to page 51 regarding creating a sense of place.
MSMP011	Angela Costello	Supports proposals. Mosstodloch is a friendly community to grow up in and the plan is great idea for the future. On waiting list for a property.	Support noted.	
Impacts on Infrastructure and services				
MSMP002	Emma Craig	Will put bigger strain on the hospital in Elgin which is already terrible.	The masterplan includes proposals to strengthen the village centre this includes potential for enhanced retail provision to support new homes and support local living.	
MSMP003	Michelle Graham	Any expansion proposals must include building of a new school. The existing school is not fit for		

		purpose and could not support an influx of families from 500 new houses.	<p>A masterplan led approach ensures that all necessary long term infrastructure and transportation requirements are identified from the outset. The MLDP takes an infrastructure first approach to ensure that any adverse impact upon existing infrastructure is mitigated. The Council seeks developer obligations, which are financial contributions, from developers towards infrastructure items to mitigate the impact of developments. In this case, to satisfy policy PP3 Infrastructure and Services of the MLDP 2020 and NPF4 Policy 18 Infrastructure First, any future proposal will have to proportionately contribute towards increasing capacity at Fochabers Medical Practice. This requirement is set out within the LDP2020 Developer Obligations Supplementary Guidance</p> <p>NHS Grampian have been consulted on the masterplan and the impacts on the GP practice are acknowledged. To address the impact on existing healthcare infrastructure contributions would be required to increase capacity. This requirement is set out within the LDP2020 Developer Obligations Supplementary Guidance. Comments relating to healthcare staffing are noted but is not an issue the masterplan or Moray Council can address as it is under the remit of NHS Grampian.</p> <p>A site was identified within MLDP2020 for a GP surgery at the OPP2 Lennox Crescent site in</p>	
MSMP004	Jan Mcgarrigle	A bigger hospital is needed to provide effective and efficient care safely to the increasing population. Dr Grays is unable to cope with increased population. New housing shouldn't be put up with an inadequate NHS provider in Moray.		
MSMP005	Brenda Hillson	Concerned about the impacts of 500 additional houses on GP surgery as the Fochabers Medical Practice can't cope already. A new GP surgery staffed with GPs required. Additional housing will also overwhelm the school.		
MSMP007	Nicola Tennant	Masterplan lacks detail on primary health care provision for new residents.		
MSMP008	Ross Gordon	No capacity at doctors, dentists, schools and other services. More people will also mean services like bin lorries, gritters that impact on Council budgets.		
MSMP010	Sophie Marshall	Queries what will be put in place to support the expansion of schools to accommodate the additional children the housing will bring. GP service already overstretched, and the new housing should not impact on current services. Even if funding is provided, GP recruitment is an issue.		
MSMP013	Sam Milne	Concerned about the capacity of primary and secondary school but also the condition of the school.		
		There is a lack of capacity in public services – dentist, hospital etc. Issues with recruitment of		

		<p>qualified staff need to be overcome before adding additional pressure.</p> <p>No nursery to provide childcare.</p> <p>Support expansion, new jobs and new opportunities but Council must address issues that will arise from expansion.</p>	<p>Fochabers. However, the suitability of the site will be reviewed as part of the development of the new Local Development Plan. Opportunities within the masterplan of a strengthened village centre could potentially include health care.</p> <p>Both Mosstodloch and Milnes Primary School currently have a school roll that is below the school capacity. Decisions and planning for the school will depend on a wider assessment by the Moray Council learning estates team and the potential needs arising from the housing land identified as part of the masterplan process.</p> <p>Maintenance of roads is a separate issue and is not part of the planning process.</p>	
MSMP014	Lindsay Smith	<p>Welcomes expansion and job opportunities that would be created but concerned about the pressure this will put on schools and primary care/hospitals. Services already overstretched. People living in the area should be able to live a satisfactory life with adequate education and healthcare facilities. Expansion will make situation worse.</p>		
MSMP009	Russell Adam	<p>Schools in Mosstodloch and Fochabers not big enough to support more pupils. Shopping facilities will not cope with additional people. Road infrastructure is in poor condition. Bus services to Elgin are not good.</p>		
MSMP0015	Michael Thain	<p>Object to proposed masterplan as apprehensive about current proposal and the potential implication for the local community and the environment.</p> <p>The scale of development raises concern about the ability of existing infrastructure to support growth. Adequate provision of schools, healthcare facilities and transportation</p>		

		networks essential to ensure services are not compromised.		
MSMP016	Stuart Hunter	<p>Expansion requires a commitment to redevelop the existing school. This could be done by setting a threshold for potential new school roll as new housing is planned/built.</p> <p>Why haven't Moray Council committed to identifying and securing an area of land to replace the existing GP surgery. This should be closer to Mosstodloch and on the main bus route.</p>		
MSMP017	Geraldine Moran	<p>As well as the primary school not being fit for purpose the same may be said for Milnes High.</p> <p>The masterplan does not mention local access to medical facilities and shops.</p> <p>The masterplan states Mosstodloch is 1 hours from Inverness or Aberdeen. The bus is closer to 2 and half hours. Bus services only run once an hour and on a Saturday there is no bus around 4/5pm from Aberdeen.</p>		
MSMP020	Innes Community Council	Fochabers Medical Centre is an independent contractor for the NHS, therefore will it be necessary to discuss development with NHS Grampian for a medical facility, or an outreach facility to cater for up to 1000 new residents?		

MSMP006	Pat McDonald	Queries what the strengthened village centre will comprise of– Nursery New School Doctor Surgery Dentist Amenities for elderly and children?	The strengthened town centre provides an opportunity to include a strong mix of community uses such as those listed alongside enhanced retail and leisure uses.	
Scale of Development				
MSMP002	Emma Craig	Proposal turns a small, nice village into an industrial town.	The masterplan includes a mix of land uses including residential, industrial, and community uses. The purpose of the masterplan is to ensure growth takes place within a planned framework with key community aspirations reflected.	
Housing				
MSMP013	Sam Milne	Housing needs to be balanced between private and social to allow new homeowners a chance to buy property.	The proposed development is likely to provide a variety of house types and tenures to provide a mix of development and integrated community. Providing affordable housing is a key priority for Moray Council which is reflected within the Local Housing Strategy. Current planning policy requires new housing development to provide 25% of the total units as affordable housing.	
MSMP009	Russell Adam	Housing proposals should be for Council to help ease Council waiting lists.		
Employment Sites				
MSMP0015	Michael Thain	Object to proposed masterplan as apprehensive about current proposal and the potential implication for the local community and the environment.	Demand for employment land (class 4, 5 and 6) is evidenced with the Moray Business Property Needs Study that was completed in 2023. This study acknowledges that viability is a barrier to delivery. However, allocation of land to support business and industry is required to support the	

		Concerned about the viability of employment areas due to oversaturation of vacant businesses in neighbouring towns. Careful planning is needed and consideration of demand and feasibility of new employment areas.	economy. It is also noted that the timescales of the masterplan is to 2040 and beyond and therefore has long timeframe.	
MSMP016	Stuart Hunter	<p>The new spine road from Cowfords roundabout has no funding or commitment from any businesses or authorities.</p> <p>Employment opportunities should be provided on LONG 1 with direct access to either or/and the dualled A96, any additional employment could be provided on land to the west of I3 and LONG 2 with direct access to Cowfords roundabout and the existing bypass which would direct industrial traffic outwith the village.</p> <p>I2 and LONG2 have direct access to the main walking and cycling routes and should be longer term housing sites.</p>	The masterplan largely reflects the designations in the Moray Local Development Plan 2020. The direction of growth in the masterplan for housing and industrial therefore reflects that approach. However it is noted that part of I3 is now proposed for housing on the immediate west of the settlement.	
Noise, Residential Amenity, Woodland Loss				
MSMP0015	Michael Thain	Object to proposed masterplan as apprehensive about current proposal and the potential implication for the local community and the environment.	Noise impacts would be considered at the planning application stage to ensure the design, layout and any proposed mitigation can be taken into account. This is required by NPF4 Policy 23 Health and safety. It is noted that the spine road is offset from existing housing and is proposed to	

		<p>Potential for noise pollution from spine road. Increase in traffic and heavy good vehicles would be disruptive and impacts on quality of life.</p> <p>Comprehensive noise assessment with effective mitigation required to address adverse impacts on residents. Prospect of an inactive road being reactivated is distressing.</p> <p>Destruction of Balnacoul Wood behind Forestry Scotland's yard is distressing. This space supports physical and mental well-being and contributes to biodiversity. Proposals should include strategies to preserve such areas.</p>	<p>the north of the settlement in a primarily industrial area.</p> <p>Any future proposals will need to take account of local residential amenity, both existing and proposed, as well as mitigate potential impacts which would be evidenced through supporting studies which may include noise assessments if required. It is noted that that the housing proposal to the south of the A96 would be accessible to cycle and pedestrians through the existing underpass and the masterplan does not propose that this route would be used by vehicular traffic.</p> <p>Development of Balnacoul Woods is not proposed as part of the masterplan. This is proposed for environmental improvement/investment with the focus at Balnacoul Woods around improved access and paths within the woodland.</p>	
Spine Road and Traffic				
MSMP020	Innes Community Council	Extremely concerned about the increase in HGV traffic on Garmouth Road (based on Jone's figures at least 250 HGVs, plus Greens of Garmouth 30 HGV's). Even with the spine road from Cowfords, this will create a greater hazard for the Primary School - Therefore, is a weight limit ban feasible at the South end of Garmouth Road?	<p>Any proposals for development would be assessed and where these generate a significant increase in trips a transport assessment will be required. Any impacts identified will require to mitigated.</p> <p>Development of the spine road will be a requirement of development. If it is not possible to deliver the full spine road phasing of industrial</p>	

		The ICC feels that there are serious traffic management issues within all aspects of the development, particularly in regard to the safety of the children attending the primary school.	development is likely to be from west to east reflecting the designations within the Local Development Plan and the timeline within the masterplan. This would allow for the spine road to be built out alongside phased development with only later phases of development being accessed from Garmouth Road helping to reduce new industrial traffic going through the village.	
MSMP016	Stuart Hunter	<p>The new spine road from Cowfords roundabout has no funding or commitment from any businesses or authorities.</p> <p>Small scale industrial would not attract funding for spine road. Development proposed to the west of Garmouth Road would therefore increase traffic passing the school. The A96 dualling proposals indicated a grade separated junction on the South of the Village. Employment opportunities should be provided on LONG 1 with direct access to either or/and the dualled A96, any additional employment could be provided on land to the west of I3 and LONG 2 with direct access to Cowfords roundabout and the existing bypass which would direct industrial traffic outwith the village.</p> <p>I2 and LONG2 have direct access to the main walking and cycling routes and should be longer term housing sites.</p>	<p>Introducing weight restrictions on the southern end of Garmouth Road is a separate process to planning and would require to be considered by the Council's Transportation service. However, the policing of any such restrictions would be by the Police. It will be important that the spine road provides an attractive and direct route to encourage HGV's to use this. Local businesses, such as James Jones, will also play in role in encouraging HGV's to use the spine road through their own traffic management plans.</p> <p>The proposed spine road is a key intervention proposed within the masterplan. This will take traffic away from the village centre including the school. Individual applications will require to meet policy requirements in respect of road safety. Where proposals will generate a significant increase in trips a transport assessment will be required. Any impacts identified will require to mitigated.</p>	
MSMP019	Angus Fettes	Link road from Cowfords should be a must. Additional HGV traffic through the village would be detrimental.		

MSMP018	James Jones and Sons Limited	<p>James Jones and Sons Ltd support the community engagement led masterplan that was presented for public consultation on 1st June 2023. This creates a clear picture of what the village could be in 2040 and beyond and serves as a platform to support and balance business growth and development which in turn shall benefit the community.</p> <p>The proposal to deliver a new spine road from the Cowfords roundabout to the Garmouth Road is an aspect of the plan that James Jones and Sons Ltd recognise and support. However, given the existing consent to expand James Jones recommend the route/junction is amended to join Garmouth Road in line with proposed new entrance to the sawmill further north.</p>	<p>Support for masterplan noted.</p> <p>The route of the proposed spine road is subject to detailed design and the location of junctions will be reviewed at this point.</p>	
Renewable Energy				
MSMP019	Angus Fettes	The Village should benefit from any renewable plants installed.	<p>NPF4 Policy 11 Energy states that development proposals will only be supported where they maximise net economic impacts, including local and community socio-economic benefits. Therefore, proposals that do not benefit the local area would not be supported.</p>	
Masterplan Consultation				
MSMP0015	Michael Thain	Lack of adequate notification of residents. Residents must receive timely and transparent information about significant development	<p>Crown Estate Scotland have developed the masterplan following community engagement. This included promotion of events via a flyer delivered to 540 addresses in and around the</p>	

		projects that could substantially impact on their lives and property.	village nine days before the first community event on 20 and 21st June 2022 (12-7pm). This flyer included a questionnaire. Adverts were also placed in the Northern Scot. A second engagement was similarly promoted by a flyer sent to addresses in and around Mosstodloch for an event held on 4th and 5th October (12 to 7pm). In addition to the engagement events at Speymouth Hall a website provided the option to view the presentation online. The draft masterplan and consultation was promoted through the Council's social media channels with the consultation open for 12 weeks for people to comment. The draft masterplan was also available to comment on at the LDP event held at Milne's Institute on the 22nd June 2023. There have therefore been several opportunities for residents to engage and comment on the masterplan.	
Landscaping				
MSMP016	Stuart Hunter	Proposals include landscaping and planting to enhance entrances and to break up and screen sites. However, tree planting associated with the A96 bypass wasn't completed so why would residents trust this plan? Active travel links already exist from Elgin to Fochabers and core paths around Mosstodloch.	Provision of landscaping would be a planning requirement with conditions likely applied to any planning consents relating to the timing of provision and ongoing maintenance of this. Active travel links noted.	
Surface Water				
MSMP020	Innes Community Council	What serious consideration to the massive increase in surface and waste water has been given to the impact on the River Spey? Given Jones proposals for a suds system within their new project ?	All development proposals are required to meet policy requirements in respect of surface and waste water. This includes NPF4 Policy 22 Flood risk and water management which requires development proposals to	

			<ul style="list-style-type: none"> i. not increase the risk of surface water flooding to others, or itself be at risk. ii. manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing blue green infrastructure. All proposals should presume no surface water connection to the combined sewer; iii. seek to minimise the area of impermeable surface. 	
Parking				
MSMP020	Innes Community Council	Has provision been made for parking facilities close to the school/petrol station/store?	Parking requirements will depend on the uses proposed and will require to be in line with the Council's parking standards set out within the Local Development Plan.	
Other				
MSMP012	Aaron Ralph	Tax payer's money would be better spent on other projects, including the Cloddach Bridge.	The masterplan has been landowner led. Delivery will be dependent on landowners and other partners.	

Key Agencies and other Stakeholders		
Scottish Environment Protection Agency (SEPA)	<p>Page 59 Black Burn Park - A new area of parkland could be created at the centre of the new employment sites through which the Black Burn flows. A large portion of this area is also at risk of flooding and so the integration of blue / green infrastructure to accommodate SuDS is important.</p> <p>SEPA wouldn't consider blue/green infrastructure or SUDS an appropriate flood management technique, whilst we support</p>	<p>Page 59 Black Burn Park – Noted text amended to acknowledge the flood risk but not linking this to the proposed blue/green infrastructure or SUDS.</p> <p>Page 22, figure 5 – the shading will be reviewed to make this clearer.</p>

	<p>both blue/green infrastructure as a means of active travel and SUDS for the treatment of surface water run-off.</p> <p>Page 22, figure 5 – The shading for flooding is difficult to interpret.</p> <p>Queries if there is a constraints or other background document that assesses flood risk at a strategic level for Mosstodloch.</p>	<p>Flood constraints considered through Strategic Flood Risk for LDP.</p>
<p>NHS Grampian</p>	<p>Notes that the masterplan echoes and aligns with aims of NHS Grampian: Plan for the Future (2022-2028).</p> <p>Dwellings at Mosstodloch will be served by the Fochabers Medical Practice. At the moment the Practice is over capacity. It is a concern that the proposed development at Mosstodloch will put Fochabers Medical Practice further over capacity. To address the impact on existing healthcare infrastructure contributions would be required to increase capacity.</p>	<p>Noted.</p> <p>The MLDP takes an infrastructure first approach to ensure that any adverse impact upon existing infrastructure is mitigated. The Council seeks developer obligations towards infrastructure items to mitigate the impact of developments. In this case, to satisfy policy PP3 Infrastructure and Services of the MLDP 2020 and NPF4 Policy 18 Infrastructure First, any future proposals will have to proportionately contribute towards increasing capacity at Fochabers Medical Practice.</p>
<p>Archaeology</p>	<p>Welcome that Masterplan provides a clear vision for the settlement however, currently the draft document is missing detail on the historic environment and the opportunities some of those sites may be able to provide (the former railway line being the most obvious one).</p> <p>Notes the recognition that one of the key strengths of the village is its proximity to local heritage (as noted within the settlement profile and SWOT Analysis on p19) however, disappointing that Figure 5 showing the 'Settlement Network' only includes point data from Canmore rather than the polygonised known site extents available from the Moray Historic Environment Record.</p>	<p>Text added and reference made to Moray Historic Environment Record.</p> <p>The potential requirement for archaeological evaluation is referenced on page 51.</p>

	<p>Indeed, within the planning process best practice dictates that Canmore data is not suitable as a data source in isolation.</p> <p>This lack of detailed information on the numerous historic sites around the village is further emphasised by the two short paragraphs under the heading 'Heritage' on p23 for potential opportunities and constraints. This omits upstanding features such as the remains of the Highland Railway Fochabers railway line, the historic Fochabers Bridge, and the buried features of the Redhall prehistoric settlement and other cropmark features that encompass a large part of the northern side of the village. The lack of consideration of the known historic assets within the vicinity is reflected in the subsequent options testing where potential visitor attractions are highlighted.</p> <p>Several options (as identified in the Land Schedule Plan page 55) will have direct impacts on archaeological sites (E3, E4, E5, VC2 for instance) and acknowledgement of these and the requirement for archaeological mitigation should be included within the document.</p>	
Transport Scotland	<p>The development proposals without the A96 bypass include residential development (R2) located to the south of the existing settlement and A96(T) and is indicated as being accessed from the local road network. We note this development is allocated within the existing LDP as LONG1. The site is separated from the existing settlement and would require pedestrians, cyclists and wheelers to cross the A96 to access the main facilities and amenities using the existing underpass to the north west of the site. An at-grade crossing facility of the existing bypass would not be acceptable to Transport Scotland. There is currently no pedestrian access or crossing facilities to, or at, the Coul Brae roundabout. Access to site R2 would not be acceptable from the A96(T).</p>	<p>It is noted that pedestrian, cycling and wheeling access to the R2 (MLDP LONG1) would be via the existing underpass under the A96 and it is noted that access from the A96 would not be acceptable.</p> <p>Text added to require further engagement with Transport Scotland.</p>

The National Transport Strategy 2 details that “transport accessibility will influence the location and design of future development. Transport will help planning and development and also ensure our communities are sustainable” and “the transport system and the consideration of the current and future transport needs of people will be at the heart of planning decisions to ensure sustainable places.”

Careful consideration of where developments should be located is of key importance. NPF4 promotes developments that prioritise walking, wheeling and cycling and reduces the need to travel by unsustainable modes. The consideration of the 20 minute neighbourhood concept is welcomed and Transport Scotland is supportive of promoting active travel within the village.

The development proposals with the A96 bypass include a tourism/ leisure development (site F on Figure 15). This site is part of the allocated site LONG1 within the adopted LDP. Access to this development is not indicated in the land use plan, however, it should be noted that Transport Scotland would not support access being taken from the trunk road slip road. While this site is part of the LONG 1 allocation within the LDP, given the current status of the A96 project, it may be premature to promote land directly adjacent to the potential junction.

Development Opportunity Site (O1), which is allocated as site OPP1 in the adopted LDP, should be accessed from the local road network. Transport Scotland would not support access to the development being taken from the proposed trunk road slip road.

	<p>We note the site G6 is for woodland and is to be accessed by new/upgraded paths and active travel routes. Additionally, the masterplan details that with the dualling, the old A96 could accommodate active travel and connect to the existing underpass and to integrate with new development proposals. Discussions with Transport Scotland are recommended to determine any future plans to de-trunk the old A96.</p>	
Historic Environment Scotland	<p>Welcome preparation of masterplan and in particular recognition of the strength and opportunities afforded by the historic environment in the wider area and the importance of considering the historic context of the village.</p> <p>Long term land not currently proposed in the LDP are unlikely to impact on any historic assets within HES's remit.</p>	Noted
Nature Scot	No comments	
MC Transportation	<p>Page 11 – reference to the A96 Corridor Review concluding in 2023 needs to be updated to “awaiting its conclusion”.</p> <p>Page 47 – Text to be added noting the draft masterplan included consultation with Transport Scotland. Reference should also mention other key consultees including SEPA, NHS Grampian, Historic Environment Scotland and Nature Scot.</p> <p>Page 56/57/58/59 There is a general lack of detail on the existing and proposed active travel/corepaths networks being proposed, It is essential to include a plan specifically showing active travel and where there are cyclepath/ corepaths/ footways etc, where the issues are in terms of providing the appropriate level of connectivity and where new provision is proposed. The</p>	Delegated authority sought to amend masterplan.

	<p>masterplan requires to be updated to include the widening of Garmouth Road and providing a 3m shared use cyclepath (as required for James Jones application) and to add the completed section of cyclepath on Stynie Road. The core path through the western edge of Mosstodloch needs to be provided as a 3m wide shared use cyclepath from the Old A96 up to the spine road.</p> <p>Page 57 – Items 15 and 16 requires to be caveated given the outcomes of the A96 Corridor Review have not concluded.</p> <p>Page 57 – Item 17 should refer to the appendix with walkable distances to existing public bus stops and potential bus routes.</p> <p>Page 59 - Text should be added to Item 7 to state “Upgrading of existing and provision of new remote foot and cyclepaths will need to be developed and agreed through detailed planning applications.”</p> <p>Page 68- The programming of the A96 needs to be caveated as this is currently unknown.</p> <p>Page 70 -The actions on page 70 need to be updated with a caveat around the A96 as until such time that a design for the A96 dualling is available, it is unclear as to whether active travel infrastructure to cross the dualled A96 can be provided. Transport Scotland are encouraged to provide an appropriate level of active infrastructure as part of their design.</p> <p>Page 73 - Rather than describe as “alternative route” the routes should be referred to as “potential bus route”.</p>	
MC Open Space, Access and Policy Officer	The Draft Masterplan key sites feature 10 shows a paths network based on existing and proposed routes. The existing routes seem to relate to the Core paths network in and around the	Mapping has been updated.

	<p>settlement. It would be helpful if the existing Core Paths were highlighted on the map and the new proposed path developments were highlighted separately. This would better show what the aspirations are for expansion of the network.</p>	
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