

Annex C – Draft Elgin Transport Strategy Written Representations

Respondent	Comment	Type of Comment	Response
Ref 001 Moray Council Development Plans (Gary Templeton)	I welcome the long term strategic approach taken.	S	Comment of support noted.
	I welcome the strong focus on supporting active travel opportunities.	S	Comment of support noted.
	I welcome the role the strategy will play in providing a consistent evidence base for developer obligations for transport issues.	S	Comment of support noted.
	The replacement of Linkwood Burn bridge and perhaps other improvements to Linkwood Road should be identified as a key improvement in the final version of the Strategy. These are key improvements required to support the anticipated level of growth to the south of Elgin and should perhaps be reflected in the Strategy	P	Suggestion noted. The revised strategy includes details of development specific options including the Linkwood Bridge and improvements to Linkwood Road between the bridge and Reiket Lane.
Ref 002 City and Royal Borough of Elgin Community Council	Elgin Community Council has provided views on the draft strategy , stating whether they support, support in principle, are neutral, skeptical or oppose each specific option.	-	NA
	Reduce movement around schools. Support.	S	Comment of support noted.
	Improve South Street / Hay Street junction. Support.	S	Comment of support noted.
	Signal improvements at Morrision Road / North Street junction. Support.	S	Comment of support noted.
	Provision of cycle parking in Elgin where cycle paths enter the town. Support.	S	Comment of support noted.
	Provision of information to support use of all modes of travel. Support.	S	Comment of support noted.
	Investigation into the use of technology to manage demand responsive bus services across Elgin. Support.	S	Comment of support noted.
	Undertaking a robust Travel Plan for the Moray Council to reduce car use by staff and visitors. Support.	S	Comment of support noted.
	Robust Travel Planning for all Elgin Schools. Support.	S	Comment of support noted.
	Improve New Elgin Road and replace junctions north and south of the railway with traffic signals. Support.	S	Comment of support noted.
	Improvement of pedestrian and cycle provision at A941 / Lesmurdie Road junction. Support.	S	Comment of support noted.
	Urban Traffic Control for congested areas. Support. If Elgin is large enough to merit its introduction.	S	Comment of support noted.
	Expansion of Moray Council Travel Plan initiatives to other Elgin	S	Comment of support noted.

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	businesses to reduce car use. Support.		
	Remove barriers to pedestrian movements across A96 (Partial Streetscape Treatment) on A96 between Northfield Terrace and Pansport roundabout. Support.	S	Comment of support noted.
	Improve performance / replace A96 / Maisondieu Road junction. Redesign / improve operation of Elgin bus station. Support.	S	Comment of support noted.
	Redesign/improve operation of Elgin Bus Station. Strongly support. Our hope is that all improvements to the bus station do not end up being a long term proposal, albeit we recognise that changes to vehicle movements in entering and leaving the bus station will be dependent on the A96 being de-trunked.	S	Support for Option M3B noted. This option is in the Long Term category. The design of the option would be developed in consultation with Transport Scotland. Timing of the option would be dependent on available funding.
	Moss Street convert to one-way (northbound) and widen footways / cycle lanes. Support in principle. Further work needs to be carried out to determine whether the one-way direction should be northbound or southbound. It is important to ensure that cars do not travel; as an alternative up Seafield Street, but travel via Maisondieu Road or Hay Street. If cars are permitted to travel south rather than north, they are less likely to use Seafield Street as a rat-run. If the new bridge at Ashgrove Road is constructed (see our comments elsewhere on that proposal), then there are merits in ensuring that the direction of travel on Moss Street and the existing A941 bridge is the same, but only if that does not then adversely impact on neighbouring residential streets. If northbound travel is chosen, then some adjustment may need to be made to the current parking on the west side of the street, or if left on that side pavements extended to clearly define the parking on that side.	S	Comment of support in principle noted. Routing of southbound traffic from the town centre to Maisondieu Road would be considered as part of the detailed design of Option I2A. Measures to discourage the use of local streets by through traffic would be considered as part of the development of the proposal and as part of the development of Option I1B.
	Road layout improvements at Bilbohall Road / Mayne Road / The Wards junction. Support in principle. Our preferred option would be to block off Mayne Road, but consultation should be undertaken with the residents living in the immediate area to ascertain which their preferred option is.	S	Comment of support in principle noted. Discussions with local residents would take place during the development of Option I3G.
	Improve operation of Edgar Road / The Wards junction. Support in principle. If the new link is constructed from Ashgrove Road to Maisondieu Road, then there may be reduced demand on this junction. Once the High School construction is complete there will be less traffic coming down	S	Comment of support in principle noted. Traffic modelling has been undertaken for future years taking into account development sites at the western end of Edgar Road. Option I3H would address the changes in traffic flows due to the development and provide

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	Glen Moray Drive and more along Edgar Road as a consequence. Proposed increased train frequency from 2019, with the level crossing remaining in place, may mean that there will be more frequent delays on The Wards, leading to more motorists avoiding the route. Traffic signals would be preferable to a roundabout.		dedicated facilities for pedestrians/cyclists.
	Improve pedestrian crossing points on Edgar Road. Support in principle. Further work needs to be done to ascertain the best locations and types of crossings. In principle we would like to see the concept introduced of raised footpaths across road junctions at this location, Query though whether such raised crossings would be suitable for those junctions heavily used by delivery trucks, e.g. at Walkers on Edgar Road. We would not support the introduction of zebra crossings as we do not believe that they are safe enough for pedestrians.	S	Comment of support in principle noted. The development of Option M1A will consider these detailed comments with the Community Council and businesses on Edgar Road being consulted further during this process.
	Improve pedestrian crossings on Station Road / Maisondieu Road. Support in principle. Further work needs to be done to ascertain the best locations and types of crossing. In principle we would like to see the concept introduced of raised footpaths across road junctions at this location. We would not support the introduction of zebra crossings as we do not believe that they are safe enough for pedestrians.	S	Comment of support in principle noted. The development of Option M1B will consider these detailed comments.
	Improve pedestrian crossings on the A96 in Elgin. Support in principle. Further work needs to be done to ascertain the best locations and types of crossing. We would not support the introduction of zebra crossings as we do not believe that they are safe enough for pedestrians.	S	Comment of support in principle noted. The development of Option M1C will consider these detailed comments.
	Improve pedestrian crossings on Thornhill Road. Support in principle. Further work needs to be done to ascertain the best locations and types of crossing. In principle we would like to see the concept introduced of raised footpaths across road junctions at this location. We would not support the introduction of zebra crossings as we do not believe that they are safe enough for pedestrians.	S	Comment of support in principle noted. The development of Option M1D will consider these detailed comments.
	Introduce measures to encourage walking / cycling / public transport use with all new housing development. Support in principle. We are assuming that the council and its community planning partners would prepare the information and developers would distribute the information.	S	Comment of support in principle noted. Information is usually provided by developers in consultation with the Council. This consultation could be extended to include community planning partners.
	New cycle / pedestrian north-south rail bridge on Ashgrove Road.	S	Comment of support in principle noted.

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	Support in principle. However if the Ashgrove Road link is not built, query whether providing this cycle/pedestrian link alone would provide sufficient value for money.		The development of Option I4B would include further work on the business case for this proposal.
	Provide cycle lanes alongside Linkwood Road (if there is sufficient road space to accommodate them). Support in principle. Concern regarding the parking which currently takes place on Linkwood Road during funerals. This parking must be maintained, so would not want to see motorists discouraged from doing so by fear of parking in what are advisory cycle lanes.	S	Comment of support in principle noted. The development of Option I4H would take into consideration the existing uses and parking demands on Linkwood Road.
	Support with reservations an Active Travel route between Pinefield and East End Primary School. Support with reservations. Not sure about directing children through what is an industrial estate.	S	Comment of support with reservations noted. The development of Option I4K will take into account pedestrian/cycle movements through the Pinefield Industrial Estate. It should be noted that pedestrians are already walking through the estate in preference to walking alongside the A96.
	New north-south link Ashgrove Road to Maisondieu Road with traffic signals. Neutral. We reserve our position on this proposal until a full cost benefit analysis has been carried out of this proposal. We recognise that it will be unpopular with residents living in the immediate vicinity of the location. We strongly suggest that discussions take place now with Network Rail, Scotrail, the local freight operators and the owners of the land required, regarding whether or not the land could be released for this proposal. If it cannot, then there is no point in pursuing what is likely to be a controversial proposal any further, and possibly tainting other aspects of the draft strategy by public opposition to this proposal.	NA	Neutral position noted. Business cases for key infrastructure proposals are currently being developed. Should the draft strategy be approved, approaches to third parties would take place as part of the development of this option.
	Pedestrianise South Street between Commerce Street and Batchen Street. Neutral Further consultation needs to take place with the businesses and residents of the affected areas.	NA	Neutral position noted. Discussions with local residents and businesses would take place during the development of Option I2E.
	Replace existing roundabout traffic signals on A96 between Northfield Terrace and North Street (first phase). Sceptical. Unsure if the signalisation and linking of signals of the junction between Northfield Terrace and North Street will actually achieve its desired outcome.	D	Comment regarding Option I3B noted. The development of junction improvements will consider traffic signals and enhancements to existing infrastructure to ensure that the options which provide the greatest benefits are pursued.
	New cycle / pedestrian north-south rail bridge on Bilbohall Road / Fleurs	D	Comment regarding Option I4C noted. The bridge over

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	Road. Sceptical. The existing road bridge is not a sufficient height to allow for future electrification on the railway. Concern that if works are undertaken to the bridge, then TMC will become liable for a full upgrade of the bridge. Clarification needs to be sought from Network Rail.		the railway at Kinloss has a separate cycle bridge which was constructed at the same height as the existing bridge. Clarification would be sought from Network Rail will regard to any liabilities.
	Sites for park and change with direct access to active travel corridors into town via key destinations. Sceptical. Unsure as to whether there would be sufficient use of such park and change sites, or if they can be located in suitable locations without significant capital expenditure.	D	Comment regarding Option M3D noted. Further development of this option would include a specific business case.
	Replace existing roundabouts with traffic signals on A96 between Northfield Terrace and North Street (second phase). Sceptical. Unsure if the signalisation and linking of signals of the junction between Northfield Terrace and North Street will actually achieve its desired outcome.	D	Comment regarding Option I3B noted. The development of junction improvements will consider traffic signals and enhancements to existing infrastructure to ensure that the options which provide the greatest benefits are pursued.
	Provide cycle lanes along Station Road. Oppose. The proposed cycle routes should be installed only if they can be done so without losing the existing turning lanes for traffic travelling east and turning into either the railway station or Lidl, as well as retaining the existing traffic islands.	OP	Comment objecting to Option I4F noted. These considerations will be taken into account as part of the detailed design of this option.
Ref 003 Springfield Properties (Innes Smith)	We support in principle of having a long term integrated transportation strategy for Elgin as a whole.	S	Comment of support noted.
	The proposals under consultation do not provide enough clear information to know if these aims can be achieved. We request that the Strategy should not be implemented, and no developer contributions should be paid until there is further information and consultation to show that; <ul style="list-style-type: none"> • The proposed strategy is value for money; • It is properly and fully costed, • There is a clear, proportionate, fair and reasonable mechanism for developer contributions related to the specific impact of proposed development. 	D, DO	Business cases for key infrastructure proposals has been prepared for Council. Should the draft ETS be approved, the next stage would be to undertake design and determine a delivery programme for the various options, which would include an update of the outline costs already available. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The measures within the Core package seek to address the cumulative impact of development. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory

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			Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	The business case to show value for money needs to be the subject of consultation before the strategy is approved for implementation.	F, DO	Comment noted. The business case for the strategy and any individual elements will be considered by Moray Council at the appropriate stage. The business case does not need to be subject to consultation for the adoption of the strategy.
	The costing of the strategy needs to be the subject of consultation before the strategy is approved for implementation.	F, DO	Comment noted. The costs of delivery will be considered by Moray Council at the appropriate stage. The costs do not need to be subject to consultation for the adoption of the strategy.
	The missing information to explain the method for assessing developer contributions needs to be the subject of consultation before the strategy is approved for implementation. ... For the above reasons we request that the Council does not introduce the proposed strategy until information needed to assess value for money, costs and the method for assessing developer contributions, is available and consulted on.	DO	Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	We would ask that consideration be given to the potential impact of evolving car technology on traffic management and future strategy.	I	Along with other Councils, we are monitoring the development of automated vehicles/technology, along with the proposed timetable for changes to legislation to enable the use of automated vehicles on the public road.
Ref 004 Savills Consultation Response on behalf of Pitgaveny (Philip Graham)	A 14 year Strategy is welcomed, and its division into Short, Medium and Long-term interventions is a useful mechanism for prioritising funding.	S	Comment of support noted.
	The sustainable objectives of active travel and public transport emphasis are to be commended.	S	Comment of support noted.
	The proposed Ashgrove Road crossing will move some of the railway crossing traffic away from the A941 route (and will further impact on the	OP, D	Option I1B provides an alternative route for traffic which would use the A941 New Elgin Road railway crossing.

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	residents of Maisondieu Road / Victoria Crescent) but it is impractical as a strategic access to the south of the railway line. There is insufficient technical evidence as to how a new road link from Maisondieu Road to Linkwood Road will ease traffic flows for the whole town despite being the most costly of all the interventions proposed.		Traffic using either the existing or proposed rail crossing would continue to travel via Maisondieu Road, Station Road or Moss Street.
	The 'Developer Obligation' section of the Strategy was not available for scrutiny with the original document. It is essential that consultees are accorded a suitable response time for this crucial concept.	DO	Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations. This will be subject to consultation.
	The boundary of the 'Town Centre' for the purposes of developer obligations does not correspond with the Local Development Plan 2015 definition of the town centre.	DO	Comment noted. The naming of this area will be reviewed as part of the Developer Obligations Supplementary Guidance annual review so not to cause confusion with the area defined within the Local Development Plan.
	If contributions are to be sought on a 'quadrant basis' but all developments are to pay towards interventions within the 'town centre' section, it is conceivable that a development will be required to pay for an intervention which is not directly related to that development. Even if payments are proportionate in some way, there is no evidence provided to show how this proportionality will work, and therefore it may not meet the tests of the Circular in terms of necessity, scale and kind and a direct link to the development.	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	It is also understood that the extent of impact of any given development will be extracted from peak traffic flow modelling for Elgin. This evidence should be made available to demonstrate the impact of new development on each of the 30+ interventions, and is particularly critical in seeking to secure shared payments towards the 'Central Area'	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure.

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	quadrant.		The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
Ref 005 Barratt Homes - Consultation Response (Chris Ross)	We welcome the preparation of a strategy for Elgin which considers transport impacts on a cumulative basis.	S	Comment of support noted.
	Barratt North Scotland is concerned that the draft strategy has not been fully costed. ...We do not believe that the high-level estimate of cost is adequate for the assessment of developer obligation to deliver the strategy.	DO	Initial costs have been estimated using estimated quantities and based on 3 rd Quarter 2016 prices, and include optimism bias.
	We consider this business case to be critical for the delivery of the draft strategy, and as such, we do not believe that the strategy should be approved until this business case is in place, and there is a robust assessment of the developer obligations sought towards the cost of the interventions set out within the strategy.	DO	The business case for the strategy and any individual elements will be considered by Moray Council at the appropriate stage.
	We do not consider that there is a robust evidence base provided with the draft Strategy to clearly demonstrate that the developer obligations sought are compliant with Circular 3/2012 Planning Obligations and Good Neighbour Agreements.	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	The developer obligations requirements should set out the direct impact that allocated sites within the Local development Plan will have on transport infrastructure interventions required through the Elgin Transport Strategy and set out the direct action required to mitigate any impacts, including cumulative impacts, of the development, and explain the costs of this direct action.	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory

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			Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	If several developments should proportionately share the cost of that direct action, this should be clearly set out within the guidance.	DO	Comment noted.
	If contributions are to be sought on a 'quadrant basis' but all developments are to pay towards interventions within the 'town centre' section, it is conceivable that a development will be required to pay for an intervention which is not directly related to that development. Even if payments are proportionate in some way, there is no evidence provided to show how this proportionality will work, and therefore it may not meet the test of the Circular in terms of necessity, scale and kind and a direct link to the development.	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	We do not consider that retrospective payments are what S75 agreements are designed for.	DO	Comment noted. Retrospective payments would only be sought if legislation and planning circulars are reviewed and updated to enable retrospective payments.
	Barratt North Scotland agrees that the developer should not be required to cover the full cost of transport infrastructure set out within the draft strategy as the necessary interventions will not wholly be required as a result of new development. We are therefore pleased to see that Moray Council accepts responsibility for a share of the costs. We do, however, query the 50% split between Council and developers. There is no evidence provided with the consultation documents to demonstrate how this split has been calculated.	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
	We are concerned that the quadrant plan which is to be used to apportion developer obligations for transport infrastructure interventions set out within the draft strategy was not publicly available as part of the consultation. We have seen this plan, but only through requesting to see it. We are concerned that all parties who will be	DO	Comment noted. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed

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	responsible for the delivery of the interventions will not have had access to this plan.		methodology for calculating transport related Developer Obligations, including the supporting quadrant information. This will be subject to consultation.
	There is a 'spreadsheet tool' referred to as part of the draft strategy which will determine the proportionality of developer obligations to be sought. We are concerned that this tool is not publicly available. We request that the tool is made public to be transparent in the evidence base for the proportional costs sought through developer obligations and to give clarity to all parties on how costs are apportioned.	DO	Comment noted. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations, including a version of the spreadsheet which demonstrates the methodology but has commercially sensitive information removed.
	Barratt North Scotland is concerned about the level of developer contributions expected in Moray across the board, which will far exceed the £6,000 per unit risk threshold identified in the District Valuer report. If, as the consultation document suggest, there are 2,700 homes to be delivered, and a transport infrastructure intervention cost of £30 million and the developer is expected to pay for 50% of this cost, then the cost per unit would be approximately £5,500 for the infrastructure interventions outlined within this strategy.	DO	The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations. The determination of levels of developer obligations will be assessed on a site by site basis.
	There are potentially significant implications on the delivery of housing in the Elgin area with developer obligations which are set too high, rendering development unviable.	DO	Comment relating to developer obligation noted.
	We do not consider that developer obligations should be sought in line with this strategy until such time as it is approved fully. It is therefore unreasonable to seek payments on any infrastructure requirements within this draft strategy until it has been formally approved.	DO	Comment noted.
	We ask for clarity on how the developer obligations set out within this strategy will be implemented. If the Council's Supplementary Guidance on Developer Obligations be redrafted to take into account all obligations in a holistic manner, and be consulted upon	DO	The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
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	all developer obligations, including transport infrastructure, is drafted and consulted upon, and until further evidence is provided by Moray Council on the costing of the proposed infrastructure interventions set out within this draft strategy.		Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
Ref 006 Homes for Scotland - Consultation Response (Nikola Miller)	We welcome the preparation of a strategy for Elgin which considers transport impacts on a cumulative basis.	S	Comment of support noted.
	Homes for Scotland is concerned that the draft strategy has not been fully costed ... We do not believe that the high-level estimate of cost is adequate for the assessment of developer obligation to deliver the strategy.	DO	Initial costs have been estimated using estimated quantities and based on 3rd Quarter 2016 prices, and include optimism bias.
	We consider this business case to be critical for the delivery of the draft strategy, and as such, we do not believe that the strategy should be approved until this business case is in place, and there is a robust assessment of the developer obligations sought towards the cost of the interventions set out within the strategy.	DO	The business case for the strategy and any individual elements will be considered by Moray Council at the appropriate stage.
	We do not consider that there is a robust evidence base provided with the draft Strategy to clearly demonstrate that the developer obligations sought are compliant with Circular 3/2012 Planning Obligations and Good Neighbour Agreements.	DO	Comment noted. Supplementary Developer Obligations guidance already contains outline information regarding the consideration of the cumulative impact of developments on transport infrastructure. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
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	There is a 'spreadsheet tool' referred to as part of the draft strategy which will determine the proportionality of developer obligations to be sought. We are concerned that this tool is not publicly available. We request that the tool is made public to be transparent in the evidence base for the proportional costs sought through developer obligations and to give clarity to all parties on how costs are apportioned.	DO	Comment noted. The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the draft Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations, including a version of the spreadsheet which demonstrates the methodology but has commercially sensitive information removed.
	Homes for Scotland is concerned about the level of developer contributions expected in Moray across the board, which will far exceed the £6,000 per unit risk threshold identified in the District Valuer report. If, as the consultation document suggest, there are 2,700 homes to be delivered, and a transport infrastructure intervention cost of £30 million and the developer is expected to pay for 50% of this cost, then the cost per unit would be approximately £5,500 for the infrastructure interventions outlined within this strategy.	DO	The Developer Obligations Supplementary Guidance annual review will come to Planning & Regulatory Services Committee in August 2017 and it is planned to incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations. The determination of levels of developer obligations will be assessed on a site by site basis.
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	and consulted upon, and until further evidence is provided by Moray Council on the costing of the proposed infrastructure interventions set out within this draft strategy.		incorporate the Elgin Transport Strategy and a detailed methodology for calculating transport related Developer Obligations.
Ref 007 Barton Willmore on behalf of Robertson Homes (Christine Dalziel)	Barton Willmore has also completed the draft ETS questionnaire. All of the points raised in the written submission have also been word for word included in the questionnaire response. Therefore the response to this written submission can be found in the relevant responses to each question in Annex B.	NA	Noted.
Ref 008 Burness Paull on behalf of Gleaner Oils Limited	While Gleaner is generally supportive of the aim of the Strategy to provide a transport framework that can support the planned growth of housing and jobs in Elgin, it is very concerned about the medium term plan to provide a north / south link over the railway line between Ashgrove Road and Maisondieu Road.	S, OP	Comment of support for strategy noted. Objection to Option I1B noted.
	The proposed new link road would result in a substantial increase in traffic passing by the Ashgrove Road entrance to Gleaner's depot. ... The current road layout means that there is no through traffic in this location, which allows tankers to access and leave the depot without conflicts with other vehicles. Our clients are understandably concerned that the construction of a new road, which greatly increases the level of traffic in this area, will also increase the risk of serious road accidents involving dangerous goods vehicles.	OP	Objection to Option I1B noted. Access for existing properties and businesses would be considered as part of the detailed design of Option I1B.
	Our clients are concerned that the new road will cross through their site ... Our clients' business depends on being able to make full use of the site at Ashgrove Road. If any part of the site had to be acquired by the Council for the construction of the road link, it is likely that Gleaner would have to relocate their business from the Ashgrove Road site completely.	OP, D	Objection to Option I1B noted, along with requirements of business to operate. This would be considered as part of the detailed design of Option I1B.
	The costs of the proposal will no doubt be a factor that the Moray Council will take into account when deciding on the final design of the railway crossing, should the Council decide to proceed with the scheme. However, our clients consider that the scheme is unlikely to provide value for money if any part of their property is required.	OP, D, F	Comment noted. The business case for the strategy and any individual elements will be considered by Moray Council at the appropriate stage.
	Gleaner considers that creating additional capacity on the road systems in Elgin is not the answer to Elgin's transport problems. More efficient management of transport infrastructure and demand management measures represent a better option than a 'predict and provide'	O	Objection to proposals to create alleviate congestion in Elgin noted. Elgin is forecast to see significant growth. Even with robust active travel planning, the level of growth drives a material increase in car trips. The

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	approach.		strategy seeks to provide for that growth, whilst encouraging as much mode shift to walking / cycling as could feasibly be achieved.
	In response to question 10 of the online consultation, Gleaner does not support the proposal to create an additional railway crossing between Ashgrove Road and Maisondieu Road as it is likely to compromise road safety around the entrance to the Gleaner depot and risk relocation or closure of the depot.	OP	Objection to Option I1B noted. This option provides an alternative route for traffic which would use the A941 New Elgin Road railway crossing. Access for existing properties and businesses would be considered as part of the detailed design of Option I1B.
Ref 009 Stagecoach North Scotland (Graeme Leslie)	It's very clear from the report that doing nothing isn't an option and the need for the bypass is vital to support Elgin's growth	S, BP	Comment of support noted.
	My concern is that we still potentially have another 14 years of disruption before that comes to fruition and to me the bypass should be accelerated for the benefit of all road users	BP	Comment noted. Delivery of a bypass for Elgin is expected as part of the A96 dualling, which is a Transport Scotland project.
	Since the initial consultation we have had to add another bus into the service 10 working in part owing to the congestion issues we face daily in Elgin	D	Comment noted.
	I note the absence of park and ride from any strategy, is there potential?	I	Conventional Park and Ride was initially considered during the option generation process. However it was not taken forward, see page 64 of Main Technical Report.
	The road network round Springfield retail park particularly the roundabout at the old market is in dire need of upgrade	SP	Support for Option I3A noted.
	I would hope bus station modernisation would be pushed up the pecking order	SP	Support for Option M3B noted. This option is in the Long Term category. The design of the option would be developed in consultation with Transport Scotland. Timing of the option would be dependent on available funding.
Ref 010 Moray Disability Forum (Irena Paterson)	First as a disabled passenger - parking in the town is a priority - yet no mention of this - no other town in SCOTLAND has taxis on the main street at both ends	NA	Comment noted. Parking in the town centre is being considered in the Elgin Parking Strategy.
	north street is a nightmare for disabled drivers and passengers - you have drivers and vehicles going past as you attempt to alight - lowered kerbs are on one side only - you have then to try and walk round the back of the vehicle to get to a lowered kerb even if it is the opposite side of the road that you want to go to	NA	Comment noted. Parking in the town centre is being considered in the Elgin Parking Strategy.
	Commerce street - you can barely get out of the vehicle for traffic but	NA	Comment noted. Parking in the town centre is being

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	also the slope - doors do not stay open - you cannot sue a mobility scooter or a wheelchair safely on it		considered in the Elgin Parking Strategy.
	Car parks have very few disabled spaces and above TK MAX - well the lift is a major problem - and you cannot walk down the ramp- the car park above the shopping centre - disabled parking is on the top level - out of action in bad wether.	NA	Comment noted. Parking in the town centre is being considered in the Elgin Parking Strategy.
	Moss street - one way is badly needed - cars often parked on both sides and nobody wants to give way - also make this a better crossing from the railway bridge to the other side and vice versa - perhaps traffic lights instead of the roundabout - as suggested and also the same at ASDA - both have problems with traffic build up - especially at the end of a month and peak times	SP, I	Comment of support for Option I2A noted. Comment relating to replacing ASDA roundabout with traffic signals noted. This may be considered as part of the detailed design process for Option I3A.
	Traffic lights outside DR.GRAYS - A 96 - this is needed - dangerous if your are coming into ELGIN and have an appointment 0- you have to cross over - or get off beside Maryhill and take the risk of crossing their and w3alking up the drive - if you are elderly or disabled not good	I	It is understood that Transport Scotland (Trunk Road Authority) are currently investigating the potential for improvements for pedestrians in the vicinity of Dr Grays.
	plenty of walk and cycle paths but nothing specific for disabled people - I own a QUINGO the pavements are no wide enough for someone to pass me with a pram - no dropped kerbs so I have to risk getting off the pavement take the risk of traffic or try to squeeze past not a good idea - can something be done that cyclist and walkers are made aware that disabled people in powered wheelchairs and scooters use these paths as well and to take care - we would love to go out and ab out but too many restrictions - we also need dropped kerbs that we can use ...	NA	Comments on footway widths noted. Without specific details of locations, we are unable to provide a full response.
	dropped kerbs - these are often impossible to use in the town - taxis or cars park over them - you cannot get through to the other side without making a huge detour - High street, no dropped kerb from to of Lossie Wynd to past the MUCKLE CROSS - so in wet weather you have to cross at Lossie Wynd or else do a long detour to get t6o the other side .Too many pavements have potholes, broken slabs, which means you can easily topple over - these are dangerous	I	Comments on dropped kerbs are noted. Specific details of locations have been passed to Traffic team for consideration.
	Park and take the b us in - people will not use this unless there is an incentive for them to do so - free b us or cheaper tickets, a timetable that is suitable, no lon g waits for a bus, proper shelter facilities bearing in mind g in mind the climate - nobody wants to get to work cold and wet.	D, I	Comments relating to Option M3D noted. Bus services in Moray are generally provided by commercial bus operators. Any proposals for reduced fares and enhanced levels of services would need to be supported and promoted by the individual bus operators.

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			Comment relating to bus shelter provision noted. Without specific details of locations, we are unable to provide a full response.
	Accessible vehicles [buses] not enough of these - so no incentive for a disabled driver or passengers to use this if they work	I	Bus services in Moray are generally provided by commercial bus operators. Any provision of accessible buses would need to be supported and promoted by the individual bus operators.
Ref 011 Rail Freight Transport Association (Chris MacRae)	The specific plan which they say heavily affects their company is a link road which will apparently come past their front door. As a fuel distributor with their own fuel depot this plan is of a great concern to them given the potential for increased level of traffic coming near the depot. In addition to their own tankers coming in and out of the depot, they also have articulated tankers from fuel distributor Sucklings Transport delivering the fuel in to them.	OP, D	Objection to Option I1B noted. This option provides an alternative route for traffic which would use the A941 New Elgin Road railway crossing. Access for existing properties and businesses would be considered as part of the detailed design of Option I1B.
Ref 012 HITRANS (Ranald Robertson)	HITRANS supports the ambitious proposals set out in the Strategy that will help enable and support sustainable economic growth for the second largest settlement in the HITRANS region.	S	Comment of support noted.
	As one of the towns with the highest levels of cycling to work and school in Scotland, Elgin has a real opportunity to be the first major settlement to realise the Scottish Governments vision of 10% of everyday journeys by bike. Implementation of the key projects identified in this strategy including, the proposed signalisation of several major junctions around the town will be vital to realising this and encouraging more people to walk and cycle.	SP	Comment of support noted.
	The traffic modelling which Moray Council has undertaken highlights the benefits of introducing signal control on the A96 trunk road corridor. This will bring benefits both in terms of improved traffic management and journey times through the town but also in reducing the severance which the trunk road currently imposes especially between the Elgin High St, the bus station and the areas to the north of the A96 by improving pedestrian crossing along this section of the Trunk road.	SP	Comment of support noted.
	The strategy includes a number of low cost / short term proposals which HITRANS will look to work in partnership with Moray Council to help progress and deliver including, improved cycle parking, improvements to demand responsive transport service in Elgin, developing sites for Park & Change on the approaches into Elgin and the implementation of other	SP	Comment of support noted.

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	elements of the walking and cycling network.		
	HITRANS recognises the need for improving the connectivity for all modes across the railway, which like the A96 acts as a barrier for many journeys within the town. HITRANS looks forward to working with Moray Council to help realise the proposals for a new north south link between Ashgrove Road and Masiondeau Road that protects opportunities for rail freight potential within the town, and also the implementation of new traffic management proposals around the New Elgin corridor.	SP	Comment of support noted.
	HITRANS recognises that some of the transport proposals and supporting streetscape improvements identified are dependent on the delivery of the Scottish Governments A96 dualling plans and will work the Council and Transport Scotland to ensure that the Elgin bypass section of this project is prioritised. Similarly improved rail connectivity from the ongoing Aberdeen to Inverness rail enhancements that will provide hourly Inverness to Elgin services (half hourly in the morning and evening peak) and improved connectivity in the morning to Aberdeen will help ensure that Elgin and the wider Moray area are more accessible than ever before	SP, BP	Comment of support noted.
	We look forward to working with Moray Council and other stakeholders to deliver this ambitious strategy for Elgin in the coming years.	S	Comment of support noted.
Ref 013 Petition	<p>We as a group of Ashgrove residents want the Moray Council to dismiss their “consideration” for a proposal of a bridge/road/cycle path and walk way from Maisondieu Road across the railway sidings in order to reach Ashgrove Road/Linkwood Road.</p> <p>The residents of Ashgrove have been informed that the businesses of Gleaner Oils, Harpers and various other smaller businesses have already lodged objections against these proposals. Gleaner Oils are a well established company of some 60 years on this site. It would be highly unreasonable and what’s more dangerous for any bridge/road/cycle way of pedestrian walk way to be built in this area.</p> <p>Fifteen old railway cottages have been in this area since before 1900. These old cottages were not built to withstand constant traffic passing back and forth at the bottom of their gardens. We already feel and hear the rumble of the heavy lorries which speed down Ashgrove Road.</p> <p>There is an old Pill Box at the bottom of No1 Ashgrove Cottages and directly opposite are Gleaner Oils offices etc. There is certainly no room</p>	OP	

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	<p>for a much wider road, cycle path or pedestrian walkway!</p> <p>Due to the increasing heavy traffic which already uses this access to their businesses the surface of the current road is not suitable for any additional traffic.</p> <p>The existing Ashgrove hump back bridge is already straining under the volume of traffic which uses Ashgrove Road as a short cut. This residential road was never built for industrial traffic. By adding a further access to it will only increase the strain on a very old bridge.</p>		
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Key for Types of Comment

A	Lack of public awareness of ETS
BP	A96 dualling/bypass
D	Lack of detail on proposals
DO	Developer obligation comment from house builder or agent
F	Financial constraints to delivery of ETS
I	Idea for additional scheme in ETS
NA	Not Applicable
O	Objection to ETS
OP	Objection to specific proposal in ETS
P	Planning related comment
PB	Public behavior/opinion
S	Supports ETS
SP	Support for a specific proposal in ETS
SR	Support for crossing of railway to the west
T	Timescales