Planning and Regulatory Services Committee

Tuesday, 14 March 2023

NOTICE IS HEREBY GIVEN that a Meeting of the **Planning and Regulatory Services Committee** is to be held at **Council Chambers**, **Council Office, High Street, Elgin, IV30 1BX** on **Tuesday, 14 March 2023** at **09:30.**

BUSINESS

1	**Sederunt**	
2	**Declaration of Group Decisions and Members Interests ***	
3	**Minute of Meeting dated 20 December 2022**	**7 - 38**
4	**Written Questions ****	
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6	**Planning Application 21/01163/APP**	**41 - 90**
	Report by Appointed Officer	
	Residential development, landscaping and associated infrastructure at Glassgreen Village, Phase 2, Elgin South, Elgin for Springfield Properties PLC	
7	**22/01652/PAN**	**91 - 96**
	Report by Depute Chief Executive (Economy, Environment and Finance)	
	Erection and operation of anaerobic digestion plant and associated infrastructure on land at Longmorn, Elgin	

8 **22/01653/PAN** **97 - 102**

Report by Depute Chief Executive (Economy, Environment and Finance)

Erection and operation of anaerobic digestion plant and associated infrastructure on land at Rathven, Buckie

9 **23/00206/PAN** **103 - 108**

Report by Depute Chief Executive (Economy, Environment and Finance)

Proposed installation of an energy storage facility including the siting of battery enclosures, power conversion units and transformers, a substation, hard-standing area, fencing, vehicular access, grid connection and ancillary works on land to west of Berryburn Substation, Moray

10 **Planning Performance Framework 2021-22** **109 - 154**

Report by Depute Chief Executive (Economy, Environment and Finance)

11 **Moray Wind Energy Landscape Sensitivity Study** **155 - 334**

Report by Depute Chief Executive (Economy, Environment and Finance)

12 **Creation and Operation of a Moray Trusted Trader Scheme** **335 - 348**

Report by Depute Chief Executive (Economy, Environment and Finance)

13 **Question Time *****

Consider any oral question on matters delegated to the Committee in terms of the Council's Scheme of Administration.

Watching the Meeting

You can watch the webcast live by going to:

http://www.moray.gov.uk/moray_standard/page_43661.html

Webcasts are available to view for 1 year following the meeting.

You can also attend the meeting in person, if you wish to do so, please come to the High Street entrance door and a member of staff will be let into the building.

Summary of Planning and Regulatory Services

Committee functions:

Town and Country Planning; Building Standards; Environmental Health; Trading Standards; Weights & Measures, Tree Preservation Orders, and Contaminated Land issues.

GUIDANCE NOTES

* **Declaration of Group Decisions and Members Interests -** The Chair of the meeting shall seek declarations from any individual or political group at the beginning of a meeting whether any prior decision has been reached on how the individual or members of the group will vote on any item(s) of business on the Agenda, and if so on which item(s). A prior decision shall be one that the individual or the group deems to be mandatory on the individual or the group members such that the individual or the group members will be subject to sanctions should they not vote in accordance with the prior decision. Any such prior decisions will be recorded in the Minute of the meeting.

** **Written Questions** - Any Member can put one written question about any relevant and competent business within the specified remits not already on the agenda, to the Chair provided it is received by the Proper Officer or Committee Services by 12 noon two working days prior to the day of the meeting. A copy of any written answer provided by the Chair will be tabled at the start of the relevant section of the meeting. The Member who has put the question may, after the answer has been given, ask one supplementary question directly related to the subject matter, but no discussion will be allowed.

No supplementary question can be put or answered more than 10 minutes after the Council has started on the relevant item of business, except with the consent of the Chair. If a Member does not have the opportunity to put a supplementary question because no time remains, then he or she can submit it in writing to the Proper Officer who will arrange for a written answer to be provided within 7 working days.

*** **Question Time -** At each ordinary meeting of the Committee ten minutes will be allowed for Members questions when any Member of the Committee can put a question to the Chair on any business within the remit of that Section of the Committee. The Member who has put the question may, after the answer has been given, ask one supplementary question directly related to the subject matter, but no discussion will be allowed.

No supplementary question can be put or answered more than ten minutes after the Committee has started on the relevant item of business, except with the consent of the Chair. If a Member does not have the opportunity to put a supplementary question because no time remains, then he/she can submit it in writing to the proper officer who will arrange for a written answer to be provided within seven working days.

THE MORAY COUNCIL

Planning and Regulatory Services Committee

SEDERUNT

Councillor David Gordon (Chair)
Councillor Marc Macrae (Depute Chair)

Councillor Neil Cameron (Member)
Councillor John Cowe (Member)
Councillor John Divers (Member)
Councillor Amber Dunbar (Member)
Councillor Jérémie Fernandes (Member)
Councillor Donald Gatt (Member)
Councillor Sandy Keith (Member)
Councillor Scott Lawrence (Member)
Councillor Graham Leadbitter (Member)
Councillor Paul McBain (Member)
Councillor Derek Ross (Member)
Councillor Draeyk Van Der Horn (Member)
Councillor Sonya Warren (Member)

Clerk Name:	Lissa Rowan
Clerk Telephone:	07765 741754
Clerk Email:	committee.services@moray.gov.uk

MORAY COUNCIL

MINUTE OF MEETING OF THE PLANNING & REGULATORY SERVICES COMMITTEE

20 DECEMBER 2022

COUNCIL CHAMBERS, ELGIN

PRESENT

Councillors Gordon, Macrae, Cameron, Cowe, Divers, Dunbar, Gatt, Keith, Lawrence, Leadbitter, McBain, Ross, Van Der Horn and Warren

ALSO PRESENT

Councillor Harris (Item 13)

IN ATTENDANCE

Head of Economic Growth and Development, Development Management and Building Standards Manager, Mr N MacPherson, Principal Planning Officer, Mr R Smith, Principal Planning Officer, Strategic Planning and Development Manager, Ms Webster, Principal Planning Officer (Strategic Planning and Development), Mr J Killeen, Engineer (Transportation), Ms L MacDonald, Senior Planning Officer, Mr A Miller, Senior Planning Officer, Mr D Westmacott, Planning Officer, Mrs E Gordon, Planning Officer, Legal Services Manager and Mrs L Rowan, Committee Services Officer as Clerk to the Committee.

1. DECLARATION OF GROUP DECISIONS AND MEMBER'S 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.

Councillors McBain and Warren advised the Committee that, in respect of Item 6 "Planning Application 22/01104/APP", Grays Recycling is a supplier to their family businesses however were content that this would not preclude them from taking part in the debate.

During consideration of Item 8 "Planning Application 22/00410/APP", Councillor Warren became aware that the proposed tenants of the development are suppliers to her family business however was content that this would not preclude her from taking part in the debate.

Councillor Ross declared an interest in Item 9 "Planning Application 22/00563/APP" having made comments in the National Press in relation wind turbines and stated that he would not take part in the consideration of this planning application. There were no further declarations of Member's interests.

2. WITHDRAWAL OF PLANNING APPLICATION 22/01544/APP

The Chair stated that, following discussion at the recent meeting of the Education, Children's and Leisure Services Committee, Planning Application 22/01544/APP had been withdrawn from the Agenda. This was noted.

3. EXEMPT INFORMATION

The meeting resolved that in terms of Section 50A (4) and (5) of the Local Government (Scotland) Act 1973, as amended, the public and media representatives be excluded from the meeting during consideration of the items of business appearing at the relevant paragraphs of this minute as specified below, so as to avoid disclosure of exempt information of the class described in the appropriate paragraphs of Part 1 of Schedule 7A of the Act.

Paragraph No. of Minute	Paragraph No. of Schedule 7A
13	13
15	13

4. MINUTE OF THE PLANNING AND REGULATORY SERVICES COMMITTEE DATED 25 OCTOBER 2022

The Minute of the meeting of the Planning and Regulatory Services Committee dated 25 October 2022 was submitted for approval.

Under reference to paragraph 13 of the Minute, Councillors Macrae and Gordon advised that they had written to COSLA raising the concern of the Committee in relation the possible cost to the Council should any decision it makes be challenged however no response had been received as yet.

Under reference to paragraph 5 of the Minute, Councillor Warren pointed out that reference is made to Alba Place and stated that this should be changed to Alba Road as Alba Place does not exist.

In response, the Clerk agreed to amend the Minute accordingly.

Thereafter, the Committee approved the Minute of the Meeting dated 25 October 2022 subject to Alba Place being replaced with Alba Road in para 5 "Planning Application 21/01963/APP.

5. WRITTEN QUESTIONS

The Committee noted that no written questions had been submitted.

6. PLANNING APPLICATION 22/01104/APP

WARD 4: FOCHABERS AND LHANBRYDE

Proposed new recycling building at Grays Recycling Ltd, Nether Dallachy, Spey Bay, Fochabers for Grays Recycling Services Ltd

A report was submitted by the Appointed Officer recommending that, for reasons detailed in the report, planning permission be granted for an application for a proposed new recycling building at Grays Recycling Ltd, Nether Dallachy, Spey Bay, Fochabers for Grays Recycling Services Ltd.

The meeting noted that the application had been referred to Committee in terms of the Scheme of Delegation as, although the application is not a major application, the floor area proposed exceeds 2000m^2 therefore, under the approved delegation scheme, it is required to be determined by the Planning and Regulatory Services Committee. The report also advised that available Members of the Committee visited the site of the application on 16 December 2022.

Following consideration, the Committee agreed to grant planning permission in respect of Planning Application 22/01104/APP subject to the following conditions and reasons:

1. The development to which this permission relates must be began not later than the expiration of 3 years beginning with the date on which this permission is granted.

   Reason: The time limit condition is imposed in order to comply with the requirements of section 58 of the Town and Country Planning (Scotland) Act 1997 as amended.

2. No development shall commence until a Construction Traffic Management Plan (CTMP) has been submitted to and agreed in writing by the Planning Authority in consultation with the Roads Authority. Thereafter the development shall be carried out in accordance with the agreed CTMP at all times. For the avoidance of doubt the CTMP shall include as a minimum the following information:
   - Details of the routes for construction traffic from the A Class Road network to the site;
   - duration of works;
   - construction programme; parking provision, loading and unloading areas for construction traffic;
   - full details of temporary arrangements to safeguard pedestrian movements during the construction period;
   - full details of any temporary access;
   - measures to be put in place to prevent material being deposited on the public road;
   - traffic management measures to be put in place during works including any specific instructions to drivers; and
   - a programme of monitoring for all routes identified within the CTMP during construction will be required.

   Reason*:* To ensure an acceptable form of development in terms of the arrangements to manage traffic during construction works at the site.

3. All drainage proposals shall be in accordance with the submitted report entitled Surface Drainage Design Report, by Campbell of Doune Ltd dated July 2022 and approved drawings 2749-031 and 301 and shall be provided in full prior to the first use of the building hereby approved.

   Reason: To ensure that surface water drainage is provided timeously and complies with the principles of SuDS; in order to protect the water environment.

4. All planting shall be carried out in accordance with approved plan 2749 -032 rev B and shall be carried out in the first planting season following the completion of the building hereby approved. Thereafter the landscaping and planting shall be maintained as detailed on the approved plan.

   Reason: To ensure that the landscaping and associated biodiversity enhancement are timeously provided.

7. PLANNING APPLICATION 22/00410/APP

WARD 4: FOCHABERS AND LHANBRYDE

Erect showroom warehouse and workshop building on Site 17, Elgin Business Park, Elgin, Moray for Yorsipp Pension Trustees

A report was submitted by the Appointed Officer recommending that, for reasons detailed in the report, planning permission be granted for an application to erect a showroom, warehouse and workshop building on Site 17, Elgin Business Park, Elgin, Moray for Yorsipp Pension Trustees

The meeting noted that the application had been referred to Committee in terms of the Scheme of Delegation as it is for a building with a floor area in excess of 2,000 sqm. The report also advised that available Members of the Committee visited the site of the application on 16 December 2022.

Following consideration, the Committee agreed to grant planning permission in respect of Planning Application 22/00410/APP subject to the following conditions and reasons:

1. The development to which this permission relates must be begun not later than the expiration of 3 years beginning with the date on which the permission is granted.

   Reason: The time limit condition is imposed in order to comply with the requirements of section 58 of the Town and Country Planning (Scotland) Act 1997 as amended.

2. The retail showroom element associated with the development hereby permitted shall be restricted to the floor area shown on the approved ground floor plan drawing number 1085/PL/05, and remain ancillary to the use of the building as a warehouse. All retailing shall be in accordance with the detail specified in the Supporting Statement submitted with and approved as part of this application.

   Reason: To ensure retailing remains associated with the principal use of the building for storage and distribution, to allow the planning authority to give consideration for alternative retail uses for the site, in the interests of the vitality of viability of nearby town and retail centres.

3. All landscaping shall be undertaken in accordance with the approved landscaping scheme (drawing number 1185/PL/03 Rev E) hereby approved,

and within the Woodland Screen planting, all planting should be planted with a maximum 2.4 metre spacing for trees with shrubs and smaller planting being spaced at least 0.6 metres apart.

Reason: To ensure the planting is undertaken in accordance with the landscaping scheme, and that the woodland screen planting is of a sufficient density to offer screening from the trunk road to the north.

4. All planting, seeding or turfing, as well as biodiversity measures forming part of the approved landscaping scheme shall be undertaken in the first planting season following first occupation/use or completion of the development hereby approved, whichever is the soonest. Any trees or plants 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) agrees otherwise in writing.

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

5. All drainage shall be carried out in accordance with approved Drainage Impact Assessment and associated drawings.

   Reason: To ensure suitable provision of surface water drainage, in the interests of the environment and the prevention of flooding.

6. No development shall commence until details (Site Utilities Plan scale 1:500 min) have been submitted to and approved in writing by the Planning Authority.

   Reason: In the interest of an acceptable form of development and the submission of details to address details shown incorrectly or missing from the submission.

7. Notwithstanding the details submitted (plan/sections and engineering assessment) for the proposed retaining wall(s) within the development (which are insufficient to confirm (or otherwise) the extent of any structures within the development which may be retaining the public road), no development shall commence until details (plans (scale 1:500 min, including cross sections at 2m intervals) and engineering calculations) have been submitted which demonstrate the extents to which any structures within the development would be retaining the public road.

   Thereafter no development shall commence until evidence has been submitted to the Planning Authority which demonstrates that the statutory processes for the approval of the design of any retaining structures have been completed satisfactorily.

   Reason: In the interests of an acceptable form of development in the interests of road safety and the provision of details currently lacking from the submission.

8. Notwithstanding the details submitted for the customer parking layout (which are not accepted). No development shall commence until details (Plans scale

1:500 min) have been submitted to and approved in writing by the Planning Authority which confirm a separation strip of 1 metre (minimum) between the parking aisle (within the customer parking) and the back of the public cyclepath. Thereafter the development shall be completed in accordance with the approved details.

Reason: In the interest of an acceptable form of development and the submission of details to confirm that there is sufficient clearance between the internal vehicular layout and the public cyclepath to mitigate the risk of potential road safety issues for pedestrians and cyclists from vehicles manoeuvring within the development.

9. No works shall commence on site until a Construction Traffic Management Plan has been submitted to and approved in writing by the Council, as Planning Authority in consultation with the Roads Authority. The Construction Traffic Management Plan shall include the following information:
   - duration of works;
   - construction programme;
   - full details of any temporary construction access;
   - measures to be put in place to prevent material being deposited on the public road;
   - measures to be put in place to safeguard the movements of pedestrians;
   - traffic management measures to be put in place during works including any specific instructions to drivers; and
   - details for construction staff parking provision and loading and unloading areas for construction traffic.

   Thereafter, the development shall be implemented in accordance with the approved details.

   Reason: To ensure an acceptable form of development in terms of the arrangements to manage traffic during construction works at the site.

10. Prior to the access to the development becoming operational a visibility splay 4.5 metres by 70 metres in both directions shall be provided. Thereafter unless otherwise approved in writing by the Planning Authority the visibility splay shall be maintained clear of any obstruction above 0.26 metres in height, measured from the level of the carriageway.

    Reason: To ensure an acceptable standard of development is provided throughout the development site at all times in the interests of road safety.

11. Prior to completion of the development or the development becoming operational (whichever is soonest) parking shall be provided in accordance with the approved plans. Thereafter the parking shall be available at all times, unless otherwise agreed in writing by the Planning Authority.

    Reason: To ensure the permanent availability of the level of parking necessary for the development in the interest of an acceptable development and road safety.

12. Notwithstanding the details submitted for EV charging (which are insufficient and do not show the charging unit locations or specifications) no development shall commence until the following details for the provision of 6no. 22Kw

Electric Vehicle (EV) charging spaces have been submitted for approval by the Planning Authority in consultation with the Roads Authority:

- Details showing the type and specifications (22Kw minimum) of the proposed EV charging units(s).

Thereafter the EV charging facilities shall be provided in accordance with the approved details prior to the development becoming operational or opened to the public and maintained for use thereafter unless otherwise agreed in writing by the Planning Authority.

Reason: In the interests of an acceptable form of development and the provision of infrastructure to support the use of low carbon transport, through the provision of details currently lacking from the submission.

8. PLANNING APPLICATION 22/00563/APP

Councillor Ross, having declared an interest in this item, left the meeting at this juncture and took no part in its consideration.

WARD 2 – KEITH AND CULLEN

Erection of 3 Wind Turbines (at max height 149.9 metre to blade tip), control building and substation and formation of access tracks (including turning heads), hardstanding, temporary construction compound and associated works and infrastructure at Lurg Hill, Deskford, Moray for Vento Ludens Ltd

A report was submitted by the Appointed Officer recommending that, for reasons detailed in the report, planning permission be granted for an application for the erection of 3 Wind Turbines (at max height 149.9 metre to blade tip), control building and substation and formation of access tracks (including turning heads), hardstanding, temporary construction compound and associated works and infrastructure at Lurg Hill, Deskford, Moray for Vento Ludens Ltd.

The meeting noted that the application had been referred to Committee in terms of the Scheme of Delegation as the Appointed Officer considers the matter raises matters of wider community interest and/or planning significance by virtue of the scale or height of the turbines, which exceed 40 metre (to blade tip). The report also advised that available Members of the Committee visited the site of the application on 16 December 2022.

Following consideration, the Committee agreed to grant planning permission in respect of Planning Application 22/00563/APP subject to the following conditions and reasons:

1. The development to which this permission relates must be begun not later than the expiration of 5 years beginning with the date on which the permission is granted.

   Reason: The time limit condition is imposed in order to comply with the requirements of section 58 of the Town and Country Planning (Scotland) Act 1997 as amended.

2. The permission as hereby granted is for a period of 35 years from the date when electricity is first exported from any wind turbine within the development to the electricity grid network (First Export Date), and written confirmation of this First Export Date shall be provided to the Council, as planning authority within one month thereof.

   Reason: To define the duration of the permission.

3. In the event that any wind turbine(s) installed and commissioned fail(s) to supply electricity on a commercial basis to the grid for a continuous period of 12 months, or is no longer required, the turbine(s) in question shall be deemed to have ceased to be required. Under such circumstances, the wind turbine(s) along with any ancillary equipment, fixtures and fittings no longer required in connection with the remaining turbine(s) shall be dismantled and removed from the site within 6 months of the end of the said continuous 6 month period, or when ceasing to be no longer required.

   Thereafter, the surrounding land shall be re-instated in accordance with a re-instatement scheme to include specification of all works and timescale for re-instatement of the land, which shall previously have been submitted to and approved by the Council, as planning authority.

   Reason: To ensure that any redundant or non-functioning wind turbine(s) is/are removed from the site in the interests of public safety, amenity and environmental protection and to ensure acceptable arrangements for the re-instatement of the ground are provided.

4. No development (excluding preliminary ground investigation which shall be permitted) shall commence until:
   a) draft Decommissioning and Site Restoration Plan for the site has been submitted to and approved in writing by the Council, as planning authority in consultation with SEPA, NatureScot and/or other agencies as appropriate; and
   b) thereafter, and not later than 12 months prior to the expiry of this permission or decommissioning of the development, whichever is the sooner, a detailed Decommissioning and Site Restoration Plan, based upon the principles outlined in the approved draft Plan, shall be submitted to and approved by the Council, as planning authority in consultation with SEPA, SNH and/or other agencies as appropriate.

   The required/proposed plans shall include provision for all turbines and ancillary infrastructure and equipment (including all buildings and structures, hardstandings and tracks, etc.) to be decommissioned, de-energised and dismantled to at least ground level and thereafter, removed from the site together with the arrangements to retain any access tracks and other infrastructure on the site, the treatment of disturbed ground surfaces, the management and timing of all proposed works, the provisions for environmental management including traffic and other plans to address issues and impacts likely to arise during the decommissioning period and the provisions for the restoration and aftercare of the site.

   Thereafter, the development shall be decommissioned and the site restored and re-instated in accordance with the approved Plan details.

Reason: To ensure the arrangements for both decommissioning of the development and re-instatement of the site are undertaken in an appropriate environmentally acceptable and timeous manner, with all wind turbines and associated infrastructure permanently removed from the site in the interests of safety, environmental protection, amenity and appearance of the site and the surrounding area.

5. Prior to the development commencing, details shall be submitted to and approved in writing by the Council, as planning authority regarding evidence of a bond or other similar financial provision to be put in place to cover all decommissioning and site restoration costs on the expiry of the permission or where the turbines cease to be required, whichever is the sooner. The required bond or equivalent shall:
   a) be based on the Decommissioning and Site Restoration Plan (as required by Condition 4);
   b) include documentary evidence to demonstrate that the amount of the bond or financial provision is sufficient to meet the full estimated costs of decommissioning and site restoration, including dismantling, removal, disposal, site restoration, remediation and all other incidental works and professional costs; and
   c) include details to ensure and demonstrate that the proposed financial arrangements will be maintained and be subject to periodic review throughout the lifetime of the development. The findings of each successive review shall be submitted to and approved by the Council, as planning authority, and include evidence to demonstrate that financial arrangements continue to remain in place and remain sufficient for both the decommissioning of the development and restoration of the site. The review period shall be not less than 5 yearly intervals from commencement of the development, or such other period as may be agreed in writing with the Council, as planning authority.

   Thereafter, the development shall not commence until written evidence has been provided to the Council, as planning authority to confirm that the approved bond or financial provision arrangement has been put in place.

   Reason: To ensure that sufficient funds are available to address the anticipated arrangements and estimate of costs of decommissioning and re-instatement and restoration of the site.

6. No development shall commence (excluding preliminary ground investigation which shall be permitted) until the following information has been submitted to and approved by the Council, as planning authority in consultation with SEPA, NatureScot and other agencies where appropriate:
   a) details of the make, model, design, power rating and sound power levels of all turbines to be used (and at all times the total number of turbines to be erected shall not exceed 3 and the blade tip height shall not exceed 149.9 metres above ground level);
   b) the external colour and/or finish of the turbines including towers, nacelles and blades, which shall be non-reflective, semi-matt pale grey/off-white;
   c) unless otherwise located within the tower of each wind turbine, the location, design specifications, external material finishes and colour of any external wind turbine transformer housing;
   d) for the sub-station compound, the design external appearance and material finishes and colour of all proposed buildings and structures to be

erected, stationed or installed within the compound area (including any sub-station control building) together with the finalised site layout arrangements including the location, dimensions, external appearance and surfacing materials for the compound area, all fencing or other means of enclosure to be erected and all other proposed/required ancillary infrastructure to be provided including any required/proposed external switch gear infrastructure to be located within the compound, the arrangements for access and parking and disposal of foul and surface water from the compound area, external lighting arrangements (where proposed), etc.;

e) for the temporary construction compound, the location, extent and site layout arrangements including the placement and purpose/use of all buildings/structures within the compound, areas for storage of materials, parking, disposal of foul and surface water, means of enclosure, and external lighting arrangements, etc. together with timescales for both establishment and removal of the temporary construction compound and details for restoration and re-instatement of the site following removal of the temporary compound;

f) detailed access track designs for all on-site access tracks and passing places, to include their location and routing, design construction specifications and surfacing materials, and the arrangements for drainage disposal for each track section;

g) the location(s) and design specification(s) for all required/proposed up-graded existing and new watercourse crossings and engineering works within the water environment. With the exception of any proposed watercourse crossings and directly related tracks, the details shall demonstrate that all new infrastructure works occur out with a 50 metre buffer area from water features on the site unless justification is provided, all watercourse crossings shall be adequately sized to enable them to accommodate 1 in 200 year peak flows (with allowance for climate change of 35% increase in flows) at each point without causing constriction of flows or increasing the risk of flooding elsewhere, and where watercourse crossings cannot be avoided, the use of bottomless or arched culverts (or bridging solutions) which do not affect the bed or banks of the watercourse, and all designs of crossings shall follow good practice guidelines;

h) a drainage assessment or strategy addressing all drainage from the site to include the location(s), design specification(s) and timescale(s) for provision of the arrangements for the disposal of foul and surface water from the site, the former shall include the disposal of effluent from the site and the latter shall incorporate SUDs, and provide for details to address both construction and operational stages of the development and demonstrate how run-off will be managed to minimise the risk of flooding, erosion, sediment run-off and pollution of any watercourse;

i) details of arrangements to monitor private water supplies during all stages of the development, and in the event of any adverse effects on water quality or quantity being identified, the arrangements and procedures to undertake restorative and remedial works to maintain any supply. This shall include measures to monitor the supply known as 'Mid Skeith' to detect any changes to water quality and allow for further mitigation measures to be put in place if necessary. This shall include notification to Scottish Water at potectdwsources@scottishwater.co.uk, 3 months in advance of any works commencing on site to make its operational teams aware (see consultation response date 30 November 2022); and

j) details of all required/proposed mitigation measures (where not already embedded within the submitted design and layout of the development) for all stages of the development, to be contained within a Schedule of Mitigation or similar together with details regarding the process to control/action changes from any agreed Schedule of Mitigation. The Schedule shall include (but not be limited to) all required/proposed measures to mitigate the impact of the development upon the water environment (hydrology, hydrogeology and geology) and nature conservation (ecology and ornithology including protected species and sensitive habitat) interests.

Thereafter, the development shall be implemented in accordance with the approved details

Reason: Details of the matters specified are lacking from the submission and to ensure an acceptable form of development in landscape, visual and/or other environmental considerations, including addressing the risk of damage from flooding and surface water effects including pollution, erosion and sediment impacts on the environment, to minimise impacts on ecological habitats, in the interests of good land management and protection and enhancement of habitats, and to maintain the wholesome provision of any private water supply where affected by the development.

7. No development shall commence until a detailed Site-specific Construction Environmental Management Plan has been submitted to and approved in writing by the Council, as Planning Authority in consultation with SEPA, NatureScot and other agencies as appropriate. The Plan shall be closely based on supporting document by Atmos Consulting, dated March 2022, document reference 57120, titled “Lurg Hill Wind Farm - Outline Construction Environmental Management Plan”, address all stages of the development (construction, operation and decommissioning), and identify all works and elements potentially capable of giving rise to pollution or causing environmental harm, and all required/proposed measures to mitigate the identified impacts. The Plan shall include but not be limited to the following:
   a) construction method statement covering the provision of all turbines and site infrastructure;
   b) pollution prevention and control measures – to include arrangements for storage and management of oil, fuel and concrete on the site;
   c) construction surface water management plan - to include a map of all watercourses and ditches on site and all proposed infrastructure, mitigation proposals and justification of appropriateness, a map of all proposed mitigation locations (i.e. silt fences, straw bales, cross drains, settlement lagoons, etc.) and details of procedures for dealing with emergencies and spills;
   d) drainage management plan - to address the management of foul and surface water drainage, in both water quality and quantity terms and the arrangements to dispose of foul effluent, and manage surface water to prevent flooding, and pollution of water courses (see Condition 6 h);
   e) peat protection/management plan to show how the finalised micro-sited layout has been designed to minimise impact on and avoid areas of deep peat. Specifically, the plan must show peat probing results and in the vicinity of Turbine 1 and include results of a detailed survey on a 10 metre by 10 metre grid basis around the centre of the proposed turbine base and track leading to it.

f) emergency procedures to include the locations and use of spill kits, etc. and provisions for staff training;
g) adverse weather (wet weather) working – to include an action plan (after H&S considerations) about arrangements for working and assessment of potential damage including sediment mitigation, use of equipment (for example, pumps), etc.;
h) ground and surface water management and treatment - to include details for monitoring (to be established prior to the commencement of works on site and thereafter for all subsequent stages of the development), and a response plan to detail actions to be taken should impacts on the water environment occur;
i) water abstraction – to include details of any abstraction/dewatering, proposed quantities, uses and discharges including use of any temporary sub-surface water controls such as de-watering during construction (and where de-watering is used, the Plan shall demonstrate that any such discharges are limited to discharges that are of uncontaminated groundwater abstracted directly through boreholes/well pointing and discharged without contact with any other drainage run-off);
j) details of construction compound(s) to include the arrangements for refuelling, tools and materials storage, car parking and concrete batching plant, settlement lagoons (to prevent cement and concrete washing out into ground or surface water) and the details of the final outfall to surface or groundwater and the arrangements to treat such effluent prior to discharge, for example by installation of a treatment plant or use of alternative arrangements (for example, that wash out water is tankered off-site, etc.); these details shall be agreed with the Planning Authority in advance in terms of siting and form of construction;
k) dust management plan;
l) measures to prevent loose or deleterious material being deposited on the local road network including provision for on-site wheel cleaning, etc;
m) noise management plan - to identify all sources of noise emissions associated with the construction phase of the development together with details of all measures to manage and mitigate the effects of construction noise occurring at and within the site;
n) details of all required/proposed pre-commencement of development ecological surveys to be undertaken to determine the presence or otherwise of any designated habitat or protected species, to include a schedule identifying which habitats and species will be subject to survey, the scope and time-scale(s) for undertaking each survey, and thereafter the results of the surveys together with all further measures required/ proposed to mitigate the impact of the development upon those species and habitats as identified within the Environmental Appraisal (Chapter 6 Ecology and Chapter 7 Ornithology, mitigation sections for construction and operational phases refers); and
o) invasive non-native species protocol – to address all bio-security and other measures to be adopted to remove or prevent the spread of any non-native plant species on the site.

In addition, the CEMP shall include reference to the terms of appointment of an appropriately qualified Ecological Clerk of Works (ECoW), to be appointed by the applicant/developer/wind turbine operator and approved by the Council, as planning authority in consultation with NatureScot. The terms should identify the period(s) of appointment and the remit of the ECoW in terms of roles and responsibilities which should include (but not be limited to) undertaking pre-

construction survey work and monitoring compliance with the hydrological and ecological/ornithological commitments and mitigation arrangements to be undertaken, as identified in the Environmental Appraisal and other supporting documents including the Outline CEMP, overseeing the placement of development infrastructure within the site and addressing all environmental considerations, and the arrangements for reporting upon works undertaken on site and incidences of non-compliance of works to the Council, as planning authority and the applicant/developer/wind farm operator's construction representatives.

Thereafter, the development shall be carried out in accordance with the approved Plan.

Reason: In order to ensure that all development works are undertaken and managed in an environmental acceptable manner and to minimise the impacts arising from construction and operation of the development upon the environment, to secure detailed information on the delivery of mitigation works and measures as identified which are current lacking from the submitted particulars and to secure effective monitoring and compliance of all.

8. Prior to the commencement of any part of the development:
   a) Detailed proposals for undertaking trial runs and also delivery of abnormal indivisible loads, must be submitted for approval by the Planning Authority in consultation with Roads Authority. Details must include but not be limited to detailed proposals (1:200 drawing) of the temporary measures to be provided and the proposed access onto the C4L, temporary and permanent modifications and measures required to protect the public road and structures, traffic, vehicle holding areas and non vehicular management during deliveries, time restrictions for deliveries i.e. outwith school crossing patrol times.
   b) A Construction Traffic Management Plan (CTMP) must be submitted for approval by the Planning Authority in consultation with the Roads Authority. The traffic management plan must cover the duration of the development, methods of dealing with the large delivery vehicles. The plan shall also include, the methods of marshalling and manoeuvring at junctions on the public road network and any temporary traffic waiting restriction requirements and all modifications to the road network and traffic management arrangements. Routes for deliveries to and from the site and confirmations of routes not to be used by construction vehicles and workers to access the site and measures to be put in place to prevent material being deposited on the public road.
   c) Details (1:200 scale drawing) of the proposed access junction onto the C4L (Bogmuchals - Berryhillock Road) must be submitted and approved by the Planning Authority in consultation with the Roads Authority. The width of the vehicular access shall be a minimum of 7.3 metres and have a maximum gradient of 1:20 measured for the first 25 from the edge of the public carriageway. The first 25 metres of the access shall be to The Moray Council specification and surfaced with hot rolled asphalt. Any existing ditch, watercourse or drain under the site access shall be piped using a 300 millimetres minimum diameter of pipe. The pipe shall be laid to a self-cleansing gradient. Technical approval required for access to demonstrate proposals will prevent water and loose materials from being discharged onto the public road.

d) A detailed drawing (scale 1:500 or 1:1000 which shall also include details to demonstrate control of the land) showing a visibility splay 4.5 metres by 160 metres and a schedule of maintenance for the area within the visibility splay shall be submitted to and approved by the Council, as Planning Authority in consultation with the Roads Authority.

e) Detailed drawing(s) (scale 1:500) showing the location and design of 3 passing places at locations to be agreed with the Roads Authority. One approximately 50 – 100 metres to the west of the proposed access onto the C4L to replace the existing passing place at the access onto the C4L. The second (to achieve a maximum passing place spaced of not more than 150 metres) to be located approximately 50 – 100 metres to the east of the proposed access onto the C4L. The third passing place to be located approximately 130-150 metres east of the existing passing place at Greenhill (to achieve a maximum spacing of not more than 150 metres between passing places).

f) Details of the vehicle gross weights and maximum axle loads are required.

Thereafter, the works shall be implemented in accordance with the approved details.

Reason: To ensure an acceptable development in road safety terms through the provision of details currently lacking.

9. Prior to the commencement of construction and deliveries:

a) Evidence that a S96 'Wear and Tear' agreement between the developer and the Roads Authority has been completed and signed by both parties, must be submitted to the Planning Authority. The scope of the agreement shall assess, monitor and address the impact of construction and delivery traffic on the road network for the duration of the construction of the development and must include all roads within the Moray Council area between the site access and the first 'A' class road along the agreed construction access route(s).

b) Abnormal load trial run(s) must be undertaken after all mitigation works have been completed to confirm the works are acceptable and to identify any other restrictions not previously addressed and the frequency and location of abnormal load passing places/oncoming vehicle holding areas required. Representatives from Moray Council Transportation (Traffic), and Police Scotland must be invited to the trial run.

c) Prior to any abnormal indivisible load being delivered to the site, all suspensive works approved through condition (8 a,b,c,d,e,f) required prior to commencement of construction, must be provided in accordance with the approved plans. Any works undertaken are to be permanent for the duration of the operation of the development unless otherwise agreed in writing with the Roads Authority.

d) The visibility splay of 4.5 metres by 160 metres shall be provided and thereafter the visibility splay shall be maintained at all times free from any obstruction exceeding 1.0 metres above the level of the carriageway in accordance with the agreed schedule of maintenance.

Thereafter, the works shall be implemented in accordance with the approved details.

Reason: The provision of details currently lacking and in order to ensure that acceptable infrastructure is provided on the route to/from the development in the interests of road safety.

10. The proposed route for any abnormal loads on the trunk road network must be approved by Transport Scotland, as the Trunk Roads Authority, prior to the movement of any abnormal load. Any accommodation measures required, including the removal of street furniture, junction widening, traffic management, must similarly be approved. Full details of proposed works shall be developed in consultation with the Trunk Road Operating Company and Transport Scotland Area Manager at the earliest opportunity through a Minute of Agreement (https://www.transport.gov.scot/our-approach/industry-guidance/work-on-the-scottish-trunk-road-network) and issued for their approval prior to the commencement of construction operations.

    Reason: To maintain safety for both the trunk road traffic and the traffic moving to and from the development ; and to ensure that the transportation of abnormal loads will not have any detrimental effect on the trunk road network.

11. Any additional signing or temporary traffic control measures deemed necessary due to the size or length of loads being delivered must be undertaken by a recognised Quality Assured traffic management consultant, to be approved by the Planning Authority, in consultation with Transport Scotland as the Trunk Roads Authority, before delivery commences.

    Reason: To ensure that abnormal loads will not have any detrimental effect on the trunk road network.

12. The developer shall submit proposals for an abnormal loads delivery trial-run to be undertaken with the involvement of Police Scotland and prior to the commencement of abnormal loads deliveries. Trial-run proposals shall be submitted to and approved in writing by the Planning Authority, in consultation with Transport Scotland as the Trunk Roads Authority.

    Reason: To ensure that the transportation of abnormal loads will not have any detrimental effect on the trunk road network.

13. No development shall commence until a Construction Traffic Management Plan (CTMP) has been prepared and approved in writing by the Planning Authority, in consultation with Transport Scotland as the Trunk Roads Authority.

    Reason: To minimise interference with the safety and free flow of the traffic on the trunk road , to ensure the safety of pedestrians and cyclists using the trunk road and adjacent facilities, and to be consistent with current guidance and best practice.

14. All vehicles transporting construction material to and from the proposed development should be sheeted.

    Reason: To ensure that material from the site is not deposited on the trunk road to the detriment of road safety.

15. Prior to the commencement of construction, vehicle wheel cleansing facilities shall be installed and brought into operation, the design and siting of which

shall be subject to the prior approval of the planning authority, in consultation with Transport Scotland as the Trunk Roads Authority.

Reason: To ensure that material from the site is not deposited on the trunk road to the detriment of road safety.

16. Prior to any decommissioning of the development, a Decommissioning Plan shall be prepared and approved in writing by the Planning Authority, in consultation with Transport Scotland as the Trunk Roads Authority.

    Reason: To minimise interference with the safety and free flow of the traffic on the trunk road.

17. No development shall commence unless and until an Air Traffic Control Radar Mitigation Scheme to address the impact of the wind turbine upon air safety has been submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence (MOD).

    The Air Traffic Control Radar Mitigation Scheme is a scheme designed to mitigate the impact of the development upon the operation of the Primary Surveillance Radar at RAF Lossiemouth (and the air traffic control operations of the MOD which is reliant upon the Radar.

    The Air Traffic Control Radar Mitigation Scheme shall set out the appropriate measures to be implemented to mitigate the impact of the development on the Radar and shall be in place for the operational life of the development provided the Radar remains in operation.

    No turbines shall become operational unless and until all those measures required by the approved Air Traffic Control Radar Mitigation Scheme to be implemented prior to the operation of the turbines have been implemented and the Local Planning Authority has confirmed this in writing. The development shall thereafter be operated fully in accordance with the approved Air Traffic Control Radar Mitigation Scheme.

    Reason: To maintain aviation safety.

18. Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the Moray Council in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

    This should set out:
    a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above ground level) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and
    b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights

on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

Reason: To maintain aviation safety.

19. The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:
    a) the date of the commencement of the erection of wind turbine generators;
    b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
    c) the date any wind turbine generators are brought into use; and
    d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

    The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

    Reason: To maintain aviation safety.

20. Prior to the commencement of the development or any tree felling on the site, a Compensatory Planting Plan (CP) detailing the provision of 9.3ha of tree planting shall be submitted to and approved in writing by the Council, as Planning Authority in consultation with Scottish Forestry. The CP must provide full details of the proposed planting, including its maintenance over the entire life-span of the development and include the following information:
    a) details of the person(s) that survey, describe, assess, specify and deliver both the felling proposals and on-site and off-site CP proposals must have the relevant qualifications, technical abilities and have the necessary experience e.g. a chartered forester;
    b) the location of the on-site and off-site CP covering an area of 9.3ha should be fully detailed, described and supported with good quality maps. If peat depth is a relevant consideration, a full assessment should be undertaken using recognised survey techniques and details of this provided in the application;
    c) details of any statutory consents required to carry out the proposed CP;
    d) a full silvicultural proposal for compensatory planting, supported with maps should be provided. This should include: ground preparation, drainage, planting technique, stocking density, species, maintenance and a protection plan for the life of the development;
    e) details of the timing of the CP. All CP should be completed within five years after the woodland is removed or within two years of the development being completed. A maintenance plan with appropriate timescales should be provided for the life of the development. Subsequent establishment should be completed within the period for which enforcement action can be taken;
    f) details for monitoring of CP conditions or arrangements: An independent, qualified and technically competent professional(s) (e.g. chartered forester) with the required experience should inspect the CP scheme at regular intervals (year 1, 5 and 10) to ensure that the trees are planted

correctly, maintained to the required standard and ultimately established into woodland. The woodland must be maintained thereafter. This professional individual should report to the planning authority, to allow the CP condition to be managed and ultimately discharged; and

g) restocking timescales should be completed within two years after the woodland is removed or within two years of the associated section of the development being completed. This should only be extended if the Hylobius Decision Support System clearly shows that a delay would be a benefit, restocking should not be extended beyond 5 years in any instance.

Reason: To mitigate the effects of the development on woodland and ensure provision of satisfactory compensatory planting.

21. The permission hereby granted shall not be exercised in addition to, or in conjunction with the permission approved under formal decision notice 22/00339/APP, dated 5 July 2022 (Section 42 application to modify Condition 1 of planning permission 17/01198/EIA / PPA-300-2052, granting permission for "a period of 30 years from the date when electricity if first exported from any wind turbine within the development to the electricity network (First Export Date)" to granting a permission for a period of 35 years).

Reason: In order to avoid any ambiguity regarding the terms of this consent and to ensure that mitigation measures as set out within the EA (omitting turbines 4 and 5) are met.

22. The rating level of noise imissions from the combined effects of the wind turbines (including the application of any tonal penalty and amplitude modulation (AM) penalty) when determined in accordance with the attached Guidance Notes (to this condition), shall not exceed the values for the relevant integer wind speed set out in, or derived from, the tables attached to these conditions at any dwelling which is lawfully existing or has planning permission at the date of this permission and:

a) the wind farm operator shall continuously log power production, wind speed and wind direction, all in accordance with Guidance Note 1(d). This data shall be retained for a period of not less than 24 months. The wind farm operator shall provide this information in the format set out in Guidance Note 1(e) to the Local Planning Authority on its request, within 14 days of receipt in writing of such a request;

b) within 21 days from receipt of a written request from the Local Planning Authority following a complaint to it from an occupant of a dwelling alleging noise disturbance at that dwelling, the wind farm operator shall, at its expense, employ a consultant approved by the Local Planning Authority to assess the level of noise immissions from the wind farm at the complainant’s property in accordance with the procedures described in the attached Guidance Notes. The written request from the Local Planning Authority shall set out at least the date, time and location that the complaint relates to and any identified atmospheric conditions, including wind direction, and include a statement as to whether, in the opinion of the Local Planning Authority, the noise giving rise to the complaint contains or is likely to contain a tonal component or is likely to contain an amplitude modulation (AM) component;

c) the assessment of the rating level of noise immissions shall be undertaken in accordance with an assessment protocol that shall

previously have been submitted to and approved in writing by the Local Planning Authority. The protocol shall include the proposed measurement location identified in accordance with the Guidance Notes where measurements for compliance checking purposes shall be undertaken, whether noise giving rise to the complaint contains or is likely to contain a tonal component and/or amplitude modulation (AM) component, and also the range of meteorological and operational conditions (which shall include the range of wind speeds, wind directions, power generation and times of day) to determine the assessment of rating level of noise immissions. The proposed range of conditions shall be those which prevailed during times when the complainant alleges there was disturbance due to noise, having regard to the written request of the Local Planning Authority under paragraph (b), and such others as the independent consultant considers likely to result in a breach of the noise limits;

d) where a dwelling to which a complaint is related is not listed in the tables attached to these conditions, the wind farm operator shall submit to the Local Planning authority for written approval proposed noise limits selected from those listed in the Tables to be adopted at the complainant's dwelling for compliance checking purposes. The proposed noise limits are to be those limits selected from the Tables specified for a listed location which the independent consultant considers as being likely to experience the most similar background noise environment to that experienced at the complainant's dwelling. The rating level of noise immissions resulting from the combined effects of the wind turbines when determined in accordance with the attached Guidance Notes shall not exceed the noise limits approved in writing by the Local Planning Authority for the complainant's dwelling;

e) the wind farm operator shall provide to the Local Planning Authority the independent consultant's assessment of the rating level of noise immissions undertaken in accordance with the Guidance Notes within 2 months of the date of the written request of the Local Planning Authority for compliance measurements to be made under paragraph (b), unless the time limit is extended in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Planning Authority, the assessment shall be accompanied by all data collected for the purposes of undertaking the compliance measurements, such data to be provided in the format set out in Guidance Note 1(e) of the Guidance Notes with the exception of audio data which shall be supplied in the format in which it is recorded. The instrumentation used to undertake the measurements shall be calibrated in accordance with Guidance Note 1(a) and certificates of calibration shall be submitted to the Local Planning Authority with the independent consultant's assessment of the rating level of noise immissions; and

f) where a further assessment of the rating level of noise immissions from the wind farm is required pursuant to Guidance Note 4(c), the wind farm operator shall submit a copy of the further assessment within 21 days of submission of the independent consultant's assessment pursuant to paragraph (c) above unless the time limit has been extended in writing by the Local Planning Authority.

Table 1: Between 07:00 and 23:00 – Noise limits expressed in dB $L_{A90,10\ minute}$ as a function of the standardised wind speed (m/s) at 10 metre height as determined within the site averaged over 10 minute periods**.**

LOCATION	Standardised wind speed at 10 metre height (m/s) within the site averaged over 10-minute periods								
	4	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**
Myreton	**35.0**	**35.0**	**35.3**	**37.9**	**40.9**	**44.1**	**47.7**	**51.6**	**55.8**
Clochmacreich	**35.0**	**35.7**	**38.7**	**41.5**	**44.1**	**46.3**	**47.8**	**48.6**	**48.4**
Kintywaird	**35.0**	**35.0**	**36.2**	**39.1**	**41.9**	**44.6**	**47.0**	**48.9**	**50.0**
Brambleburn Cottage	**35.0**	**35.0**	**35.0**	**37.0**	**39.9**	**42.8**	**45.4**	**47.5**	**48.8**
Over Windyhills	**35.0**	**35.7**	**38.7**	**41.5**	**44.1**	**46.3**	**47.8**	**48.6**	**48.4**
Netherton of Windyhills	**35.0**	**35.7**	**38.7**	**41.5**	**44.1**	**46.3**	**47.8**	**48.6**	**48.4**
Backies	**35.0**	**35.7**	**38.7**	**41.5**	**44.1**	**46.3**	**47.8**	**48.6**	**48.4**
Upper Skeith	**35.0**	**35.7**	**38.7**	**41.5**	**44.1**	**46.3**	**47.8**	**48.6**	**48.4**
Mid Skeith	**35.0**	**35.7**	**38.7**	**41.5**	**44.1**	**46.3**	**47.8**	**48.6**	**48.4**
Little Skeith	**35.0**	**35.0**	**36.2**	**39.1**	**41.9**	**44.6**	**47.0**	**48.9**	**50.0**
Langley	**35.0**	**35.0**	**35.0**	**37.0**	**39.9**	**42.8**	**45.4**	**47.5**	**48.8**
Croylet	**35.0**	**35.0**	**35.0**	**37.0**	**39.9**	**42.8**	**45.4**	**47.5**	**48.8**

Table 2: Between 23:00 and 07:00 – Noise limits expressed in dB $L_{A90,10\ minute}$ as a function of the standardised wind speed (m/s) at 10 metre height as determined within the site averaged over 10 minute periods.

LOCATION	Standardised wind speed at 10 metre height (m/s) within the site averaged over 10-minute periods								
	4	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**
Myreton	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**42.2**	**47.2**	**52.9**
Clochmacreich	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**43.0**	**45.2**	**46.2**	**45.7**
Kintywaird	**40.0**	**40.0**	**40.0**	**40.0**	**41.0**	**44.1**	**46.2**	**46.7**	**45.1**
Brambleburn Cottage	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**42.8**	**46.6**	**49.8**
Over Windyhills	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**43.0**	**45.2**	**46.2**	**45.7**
Netherton of Windyhills	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**43.0**	**45.2**	**46.2**	**45.7**
Backies	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**43.0**	**45.2**	**46.2**	**45.7**
Upper Skeith	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**43.0**	**45.2**	**46.2**	**45.7**
Mid Skeith	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**43.0**	**45.2**	**46.2**	**45.7**
Little Skeith	**40.0**	**40.0**	**40.0**	**40.0**	**41.0**	**44.1**	**46.2**	**46.7**	**45.1**
Langley	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**42.8**	**46.6**	**49.8**
Croylet	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**40.0**	**42.8**	**46.6**	**49.8**

Table 3: Coordinate locations of the dwellings listed in Tables 1 and 2.

Myreton	**349628**	**856425**
Clochmacreich	**349452**	**858035**
Kintywaird	**351482**	**859347**
Brambleburn Cottage	**350969**	**856448**
Over Windyhills	**349264**	**856733**
Netherton of Windyhills	**349308**	**857282**
Backies	**349762**	**858923**
Upper Skeith	**349992**	**859109**
Mid Skeith	**350327**	**859293**
Little Skeith	**350937**	**859394**
Langley	**351560**	**856770**
Croylet	**350359**	**856276**

Note to Table 3: The geographical coordinate references are provided for the purpose of identifying the general location of dwellings to which a given set of noise limits applies.

Reason: To ensure an acceptable form of development and in order to protect the amenity of any nearby residents from any undue noise and disturbance.

23. The wind farm operator shall employ an independent consultant, approved by the Planning Authority, to measure, at the operator's own expense, the level of noise immisions from the wind turbines within the first year of the operation of the turbines. The measurement procedures, which may include filtering data according to wind direction, shall be approved by the Planning Authority prior to commencement of monitoring and shall be implemented as approved. The results of the measurement exercise shall be forwarded to the Planning Authority as soon as practicable after the completion of the monitoring exercise.

    Reason: To ensure an acceptable form of development and in order to protect the amenity of any nearby residents from any undue noise and disturbance.

24. Construction works (including vehicle movements) associated with the development audible at any point on the boundary of any noise sensitive dwelling shall be permitted between 0700 - 1900 hours, Monday to Friday and 0700 - 1300 hours on Saturdays only, and at no other times out with these permitted hours (including National Holidays). The above construction hours shall apply, unless otherwise agreed in writing with the Planning Authority, and where so demonstrated exceptional operational constraints require limited periods of construction works to be undertaken out with the permitted construction hours.

    Reason: To ensure an acceptable form of development and in order to protect the amenity of any nearby residents from any undue noise and disturbance.

25. There shall be no blasting at the development.

    Reason: To ensure an acceptable form of development and in order to protect the amenity of any nearby residents from any noise disturbance or vibration.

26. A shadow flicker impact control unit shall be installed prior to operation to turbine 1 at the development, in accordance with the details submitted in the

supporting email by Atmos consulting, dated 9th August 2022 and titled "RE:22/00563/APP Lurg Hill - Shadow flicker assessment - Env Appraisal-Section 13".

Reason: To ensure an acceptable form of development and in order to protect the amenity of any nearby residents from any undue shadow flicker.

27. At the reasonable request of the Planning Authority following a complaint the wind farm operator shall investigate and instigate appropriate mitigation measures to minimise the effects of shadow flicker.

    Reason: To ensure an acceptable form of development and in order to protect the amenity of any nearby residents from any undue shadow flicker.

28. The blades of all turbines shall rotate in the same direction and no name, symbol, sign or logo or similar means of advertisement, other than those required for health and safety reasons, shall be displayed on any part of the turbines, masts, buildings/ structures and plant, or other infrastructure associated with the development without the prior written consent of the Council, as planning authority.

    Reason: To minimise the visual impact arising from the appearance of the development.

29. a) All wind turbines, buildings, masts, areas of hardstanding and tracks shall be constructed in the locations shown in Figure 3.2 Site Layout. The location of the wind turbines, compounds, areas of hardstanding and tracks may be varied (micro-sited) within the site subject to the following, unless otherwise approved in advance in writing by the Planning Authority:
        i. no wind turbine, building, mast, tracks, hardstanding or other ancillary infrastructure shall be moved more than 50 metres from the position shown on Figure 3.2 Site Layout;
        ii. all micro-siting permissible under this condition must be approved in advance in writing by the Environmental Clerk of Works (ECoW).

    b) No later than two months after the Date of Final Commissioning, an updated site plan shall be submitted to the Planning Authority showing the final position of all wind turbines, anemometry masts, areas of hardstanding, tracks and associated infrastructure forming part of the development. The plan must also specify areas where micro-siting has taken place and, for each instance, be accompanied by the Environmental Clerk of Works or Planning Authority's approval, as applicable.

    Reason: To ensure that micro-siting decisions take account of environmental impacts and local ground conditions.

Councillor Ross re-joined the meeting at this juncture.

9. PLANNING APPLICATION 22/01269/APP

WARD 4 – FOCHABERS LHANBRYDE

Erect storage warehouses and ancillary development (amenity block sprinkler tank and pump house) land engineering (cut and fill), realignment of Core Burn and associated engineering and infrastructure works including access and sub-station on Land to the South of Crisp Maltings, Portgordon, Buckie Moray for William Grant & Sons Distillers Ltd

A report was submitted by the Appointed Officer recommending that, for reasons detailed in the report, planning permission be granted for an application to erect storage warehouses and ancillary development (amenity block sprinkler tank and pump house) land engineering (cut and fill), realignment of Core Burn and associated engineering and infrastructure works including access and sub-station on Land to the South of Crisp Maltings, Portgordon, Buckie, Moray for William Grant & Sons Distillers Ltd.

The meeting noted that the application had been referred to Committee in terms of the Scheme of Delegation as the application is for a site with an area of 2 or more hectares. The report also advised that available Members of the Committee visited the site of the application on 16 December 2022.

During his introduction, Mr MacPherson, Principal Planning Officer advised the Committee of an error in Condition 18 where reference was made to “two proposed buildings” when it should be four. He further advised that an updated landscape plan had been circulated to the Committee. This was noted.

During discussion surrounding the proposed wild flower mix in the landscape plan, it was queried what the mix would be, whether perennial or annual and how this would be maintained as different management would be required.

In response, Mr MacPherson, Principal Planning Officer advised that the proposed species of woodland flower planting was detailed in the landscape plan and that, in terms of maintenance of the woodland, this was covered in condition 21.

The Development Management and Building Standards Manager further advised that additional wording could be added to condition 21 to address the concerns surrounding the woodland wild flower mix and its management. This was agreed.

Councillor Macrae, welcomed the development and moved that the Committee agree to grant planning permission in respect of Planning Application 22/01269/APP subject to the conditions and reasons detailed within the report, taking account of the amendments to conditions 18 and 21 previously intimated by Officers.

There being no-one otherwise minded, the Committee agreed to grant planning permission in respect of Planning Application 22/01269/APP subject to the following conditions and reasons, with the following amendments to conditions 18 and 21:

- Condition 18 to state ‘four proposed buildings’ not two proposed buildings; and

- Conditions 21 should read: “Prior to development commencing a landscape maintenance and woodland management plan (covering also the two meadow types and wetland fringe areas) shall be submitted to and agreed in writing with the planning authority. Thereafter the approved landscaping/woodland shall be maintained in accordance with the agreed details.”

1. The development to which this permission relates must be begun not later than the expiration of 3 years beginning with the date on which the permission is granted.

   Reason: The time limit condition is imposed in order to comply with the requirements of section 58 of the Town and Country Planning (Scotland) Act 1997 as amended.

2. No development shall commence until a Construction Traffic Management Plan (CTMP) has been submitted to an agreed in writing by the Planning Authority in consultation with the Roads Authority. Thereafter the development shall be carried out in accordance with the agreed CTMP at all times. For the avoidance of doubt the CTMP shall include as a minimum the following information:
   a) duration of works;
   b) construction programme;
   c) number of vehicle movements (i.e. materials, plant, staff, components);
   d) schedule for delivery of materials and plant;
   e) parking provision, loading and unloading areas for construction traffic;
   f) full details of temporary arrangements to safeguard pedestrian movements during the construction period;
   g) full details of any temporary access;
   h) measures to be put in place to prevent material being deposited on the public road;
   i) traffic management measures to be put in place during works including any specific instructions to drivers.
   j) full details of construction traffic routes from/to the site, including any proposals for temporary haul routes and routes to be used for the disposal of any materials from the site;
   k) a programme of monitoring for all routes identified within the CTMP during construction will be required

   Reason: To ensure an acceptable form of development in terms of the arrangements to manage traffic during construction works at the site.

3. No development shall commence until evidence of a satisfactory Wear and Tear Agreement has been submitted to and agreed in writing by the Planning Authority in consultation with the Roads Authority. The scope of the Wear and Tear Agreement shall be agreed with the Planning Authority in consultation with the Roads Authority and shall include a condition survey of the network undertaken jointly by the developer and a representative from the Council. The survey shall include the full extent of the agreed construction traffic route(s) (within Moray) between the site and the 'A' class road network. In addition, the wear and tear agreement shall also include condition surveys of all roads identified as 'unsuitable' which must be agreed with the Planning Authority in consultation with the Roads Authority as a part of condition '2' above.

   Reason: To mitigate the potential risks from damage to the public road occurring during the construction phase of the development.

4. No development shall commence until evidence of a financial guarantee or bond or suitable equivalent and a Wear and Tear Agreement have been put in place to ensure the repair of the public road serving the site in the event that the road is not maintained in a safe condition during the construction phase of the development and to restore the road to its pre-development condition within

1 year of the development becoming operational has been submitted to and agreed in writing with the Council, as Planning Authority. For the avoidance of doubt the agreement shall cover the section of the A990 Enzie - Portgordon - Buckie Road from the A98 to the site entrance as a minimum and all roads identified for off-site disposal of material/soil as in condition '1' above.

Reason: To mitigate the potential risks from damage to the public road occurring during the construction phase of the development.

5. No development shall commence until:
   a) a visibility splay 4.5 metres by 215 metres, with all boundaries set back to a position behind the required visibility splay, has been provided in both directions at the access onto the public road; and
   b) Thereafter the visibility splay shall be maintained at all times free from any obstruction exceeding 0.6 metres above the level of the carriageway.
   c) Additionally a forward visibility splay of 215m is required to maintain at the site entrance for the vehicles waiting on the main road to turn right into the site access. These vehicles must be able to see oncoming traffic and be seen by following traffic.

   Reason: To enable drivers of vehicles leaving/entering the site to have a clear view over a length of road sufficient to allow safe exit/entry, in the interests of road safety for the proposed development and other road users.

6. No water shall be permitted to drain or loose material be carried onto the public footway/carriageway.

   Reason: To ensure the safety and free flow of traffic on the public road and access to the site by minimising the road safety impact from extraneous material and surface water in the vicinity of the new access.

7. Two car parking spaces shall be provided within the site prior to the warehouse being completed or becoming operational and shall be maintained and available for use thereafter for the lifetime of the development unless otherwise agreed in writing with the Council as Planning Authority.

   Reason: To ensure the permanent availability of the level of parking necessary for employees/visitors/others in the interests of an acceptable development and road safety.

8. No development shall commence until the following details for the provision of an Electric Vehicle (EV) charging space have been submitted for approval by the Planning Authority in consultation with the Roads Authority:
   - A detailed drawing (scale 1:200) showing the type and specifications of the proposed EV charging units(s) to serve a minimum of 1 space with a minimum power output of 22Kw (Rapid Charger). EV charging unit is to be connected to an appropriate electricity supply and should include details (written proposals and plans) to confirm the provision of the necessary cabling, ducting, and consumer units capable of supporting the future charging unit.

   Thereafter the EV charging facilities shall be provided in accordance with the approved details prior to the development becoming operational or opened and

maintained for use thereafter unless otherwise agreed in writing by the Planning Authority in consultation with the Roads Authority.

Reason: In the interests of an acceptable form of development and the provision of infrastructure to support the use of low carbon transport, through the provision of details currently lacking from the submission.

9. Construction works (including vehicle movements) associated with the development audible at any point on the boundary of any noise sensitive dwelling shall be permitted between 0800 - 1900 hours, Monday to Friday and 0800 - 1300 hours on Saturdays only, and at no other times out with these permitted hours (including National Holidays). The above construction hours shall apply, unless otherwise agreed in writing with the Planning Authority, and where so demonstrated exceptional operational constraints require limited periods of construction works to be undertaken out with the permitted construction hours.

   Reason: To protect local residents from noise nuisance in ensuring the construction phase is restricted within permitted hours.

10. Prior to development commencing, a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing by the Planning Authority in consultation with the Environmental Health Manager. The plan shall include measures to minimise construction related noise (including vibration), dust and artificial lighting. Thereafter the development will be carried out in accordance with the agreed plan.

    Reason: In order that environmental emissions are considered and managed at the construction phase, in order to protect local residents.

11. The rating level of noise associated with the development shall not exceed the background sound level by more than 5 dB at the nearest noise sensitive dwelling which is lawfully existing or has planning permission at the date of this permission. For the avoidance of doubt, the rating level and background sound level associated with this condition are defined within BS 4142: 2014 + A1:2019 Methods for rating and assessing industrial and commercial sound.

    Reason: To protect local residents from noise nuisance due to the use of the development.

12. Unless otherwise agreed in writing with the Council as Planning Authority in consultation with the Environmental Health Manager, external operations or vehicle movements relating to the operation of the warehouses shall only take place between 08.00 and 19.00 hours, Monday to Friday and 8am and 1pm, on Saturdays, and no external operations or vehicle movements shall take place on bank/public holidays.

    Reason: In order to minimise noise pollution in the interests of the amenity of neighbouring residents.

13. Prior to the development commencing details of the operational site lighting shall be submitted to and agreed in writing by the Planning Authority, in consultation with the Environmental Health Manager. Thereafter, the agreed lighting details shall be maintained throughout the lifetime of the development.

Reason: To protect residents from light nuisance due to the use of the development.

14. Prior to the commencement of development, an updated flood risk assessment on the detailed design of the channel realignment and bank reinforcement should be provided to the satisfaction of the Planning Authority in consultation with SEPA which demonstrates there is no increase in flood risk from the proposals. The submitted Portgordon Flood Risk Assessment REV03 envireau water September 2022 and the drawings in Appendix B Outline Core Burn Re-alignment Channel Design Drawings CBEC eco engineering should be used as the basis for the detailed channel design.

    Thereafter the development shall be carried out in accordance with the agreed detailed design of the channel realignment and bank reinforcement.

    Reason: To ensure the channel realignment and bank reinforcement is designed to an acceptable standard in the interests of minimising flood risk to the site.

15. Prior to development commencing details of the proposed foul sewerage system shall be submitted to and agreed in writing with the planning authority in consultation with the flood risk management team. Thereafter the agreed foul drainage system shall be installed in accordance with the agreed details, prior to the first use of the site.

    Reason: To ensure the installation of an acceptable private foul drainage system.

16. A construction phase surface water management plan shall be submitted a minimum of two months prior to the commencement of the development and shall be agreed in writing prior to work commencing with the Planning Authority in consultation with Moray Flood Risk Management. The plan shall include measures to prevent increased flood risk and to ensure heavily silted surface water does not enter any watercourse.

    Thereafter the development shall be carried out in accordance with the agreed details.

    Reason: To prevent surface water flooding during the course of the development and minimise risk to adjacent watercourses.

17. The surface water drainage arrangements for the development shall be provided and maintained in accordance with the approved Drainage Impact Assessment G:\C&S\EC22743\reports\R001 Drainage Impact Assessment Rev B.docx, dated 29/11/22, prepared by Blyth and Blyth, unless otherwise agreed by the Council, as Planning Authority. These shall be installed and operational prior to the first use of the buildings hereby approved.

    Reason: To ensure that surface water drainage is provided timeously and complies with the principles of SuDS in order to protect the water environment.

18. Notwithstanding the provisions of the Town and Country Planning (Use Classes) (Scotland) Order 1997 (or any order revoking and re-enacting that

order) the approval hereby granted only relates to the use of the four proposed buildings as Whisky Cask Storage and for no other use or purpose without the prior approval of the Council, as Planning Authority.

Reason: In order to retain Local Authority control over the use of the site and to ensure that consideration can be given to the effects and impact of uses other than that approved herewith.

19. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (or any order revoking and re-enacting that order) no development specified in Article 3, Schedule 1, Part 3, Class 13 shall be carried out without the approval of the Council, as Planning Authority.

    Reason: In order to retain control over the use of the site and to ensure that consideration can be given to the effects and impact of uses other than that approved herewith.

20. No works in connection with the development hereby approved shall commence unless an archaeological written scheme of investigation (WSI) has been submitted to and approved in writing by the planning authority and a programme of archaeological works has been carried out in accordance with the approved WSI. The WSI shall include details of how the recording and recovery of archaeological resources found within the application site shall be undertaken, and how any updates, if required, to the written scheme of investigation will be provided throughout the implementation of the programme of archaeological works.

    Should the archaeological works reveal the need for post excavation analysis the development hereby approved shall not be brought into use unless a post-excavation research design (PERD) for the analysis, publication and dissemination of results and archive deposition has been submitted to and approved in writing by the planning authority. The PERD shall be carried out in complete accordance with the approved details.

    Reason: To safeguard and record the archaeological potential of the area.

21. Prior to development commencing a landscape maintenance and woodland management plan (covering also the two meadow types and wetland fringe areas) shall be submitted to and agreed in writing with the planning authority. Thereafter the approved landscaping/woodland shall be maintained in accordance with the agreed details.

    Reason: To ensure the landscaping is delivered, retained and maintained throughout the lifetime of the development.

22. Landscaping as detailed on the approved landscaping plan, shall be provided in the planting season following the completion or first use of the development (whichever is the soonest).

    Reason: To ensure an acceptable scheme of landscaping is provided and maintained to aid the visual integration of the development and enhance habitat and biodiversity value of the site.

23. Prior to development commencing details including design, number, position and schedule for installation of bat and bird boxes to be provided adjacent to the SUDs ponds, shall be submitted to and agreed in writing with the Planning Authority. Thereafter the bat and bird boxes shall be erected in accordance with the agreed details and retained throughout the lifetime of the development.

Reason: To ensure the timeous provision of bat and bird boxes, in the interests of enhancing habitat provision across the site.

10. DEVELOPMENT PLAN SCHEME 2023 - MORAY LOCAL DEVELOPMENT PLAN 2027

A report by the Depute Chief Executive (Economy, Environment and Finance) asked the Committee to consider the current timetable for the preparation of the new Local Development Plan (LDP) 2027 and to agree that the Development Plan Scheme (DPS) and Participation Statement is submitted to the Scottish Government.

Following consideration, the Committee agreed the DPS and Participation Statement for 2023 as set out in Appendices 1 and 2 of the report and that the Scheme is submitted to the Scottish Government.

11. PLANNING POLICY GUIDANCE - MORAY LOCAL DEVELOPMENT PLAN 2020

Under reference to paragraph 6 of the Minute of the meeting of the Emergency Cabinet dated 3 June 2020, a report by the Depute Chief Executive (Economy, Environment and Finance) asked the Committee to approve planning policy guidance (PPG) for Policies PP1 Placemaking, DP1 Development Principles and EP5 Open Space of the Moray Local Development Plan (MLDP) 2020 in respect of inclusive and accessible play.

Following consideration, the Committee agreed:

(i) to approve the planning policy guidance (PPG) for the Moray Local Development Plan (MLDP) 2020, as set out in Appendix 1;

(ii) that the PPG will be used as a material consideration in the determination of planning applications; and

(iii) to note that this PPG will be combined with the guidance approved by this Committee in May 2022 into one document.

12. QUESTION TIME

Councillor Gatt raised concern in relation to the attendance of Councillors at the recent planning site visits where only 4 Councillors were in attendance and queried whether attendance on site visits should be mandatory and how much it cost the Council to hire the coach for the site visits.

In response, the Legal Adviser advised that attendance at site visits was not compulsory in order to determine planning applications however the poor level in

attendance for site visits had been noted as there was a significant cost in arranging them in terms of bus travel and officer time and that this was being kept under review. In relation to the cost of the coach, the Legal Adviser advised that she did not have this information to hand.

A short discussion then took place in relation to the pros and cons of site visits and reasons why some Members had not been able to attend due to conflicting diary appointments with the site visits being scheduled on a Friday and it was noted that this would be reviewed in the New Year.

13. REVIEW OF TREE PRESERVATION ORDERS [PARA 13]

Councillor Harris joined the meeting at this juncture.

A report by the Depute Chief Executive (Economy, Environment and Finance) informed the Committee of the outcomes from the review of existing Tree Preservation Orders (TPOs) in Moray and ask that Committee agree various revocations and amendments.

At the invitation of the Chair, Councillor Harris read out a statement from a resident in Dufftown which highlighted the concern of residents in Dufftown regarding the group of trees at Cowie Avenue and Fife Street in terms of their height and overhang and also the rookery that resides in the trees and urged the Committee to take into consideration the concern of the residents when making their decision.

Councillor Van Der Horn was of the view that more detailed information was required on each tree that had been served a TPO before the Committee could make a decision on whether the TPO should be retained or revoked.

Councillor Leadbitter agreed with Councillor Van Der Horn adding that it was not clear what criteria had been followed when deciding what TPOs should be retained or revoked and was of the view that the Committee would benefit from a briefing on the matter.

Councillor Van Der Horn then moved that the report be deferred and brought back to a future meeting of the Committee with further information on each tree and that a members briefing is arranged in relation to TPOs. This was seconded by Councillor Leadbitter.

Councillor Divers was of the view that there was sufficient information within the report to make an informed decision and moved as an amendment to Councillor Van Der Horn's motion, that the Committee agree the recommendations as printed.

Councillor Macrae being mindful of the views of the Dufftown residents suggested that, if Councillor Divers would alter his amendment to reflect that the Committee notes the petition in respect of Cowie Avenue/Fife Street TPO and add Cowie Avenue/Fife Street to the list of TPOs to be revoked, he would be happy to second his motion. Councillor Divers agreed to alter his amendment accordingly.

On a division there voted:

For the Motion (6):	Councillors Van Der Horn, Leadbitter, Cameron, Cowe, Lawrence and Warren
For the Amendment (8):	Councillors Divers, Macrae, Dunbar, Gatt, Gordon, Keith, McBain and Ross
Abstentions (0):	Nil

Accordingly, the Amendment became the finding of the Meeting and the Committee agreed to:

(i) note the assessment of Tree Preservation Orders (TPOs) in Moray, as set out in Appendix I of the report;

(ii) note the petition in respect of Cowie Avenue/Fife Street TPO;

(iii) vary Rothiemay (King George Playing Fields) TPO, as detailed in Section 6 and Appendix 2;

(iv) revoke TPOs, as detailed in Section 7, at:
- The College, King Street, Elgin;
- Fogwatt;
- Dunkinty House, Elgin;
- Croft Road, Forres;
- Tomnabat Lane, Tomintoul;
- Woodland at Damhead Cottage, Kinloss;
- Woodland at Seapark House, Kinloss;
- Groups of Trees at Deskford, Buckie;
- Cowie Avenue/Fife Street, Dufftown; and

(v) serve a TPO at Dunkinty Tree Avenue, Elgin, as detailed in Section 8 and Appendix 3.

Councillor Harris left the meeting at this juncture.

14. SUSPENSION OF STANDING ORDERS

The Chair sought the agreement of the Committee to suspend Standing Order 75 to allow the meeting to continue beyond 12.45 pm. This was agreed.

15. TREE PRESERVATION ORDER [PARA 13]

A report by the Depute Chief Executive (Economy, Environment and Finance) asked the Committee to consider a request from a member of the public to serve a Tree Preservation Order (TPO) at Queen Victoria Picnic Tree, Glenfiddich.

During discussion, Councillor Ross stated that he was of the view that the Queen Victoria Picnic Tree contributes to the distinctiveness of the area and should have a TPO given its historical significance.

Councillor Van Der Horn agreed with Councillor Ross stating that the veteran tree should be protected

Councillor Macrae agreed with the view of the Officers set out in the report and moved that the Committee agree the recommendation not to serve a TPO on the tree in Glenfiddich as printed in the report. This was seconded by Councillor Gatt.

Councillor Ross remained of the view that the tree in Glenfiddich should be protected and moved an amendment that the Committee agree to serve a TPO in Glenfiddich as set out in Section 5 of the report. This was seconded by Councillor Van Der Horn.

On a division there voted:

For the Motion (3):	Councillors Macrae, Gatt and Lawrence
For the Amendment (11):	Councillors Ross, Van Der Horn, Cameron, Cowe, Divers Dunbar, Gordon, Keith, Leadbitter, McBain and Warren
Abstentions (0):	Nil

Accordingly, the amendment became the finding of the Meeting and the Committee agreed to serve a Tree Preservation Order in Glenfiddich as set out in Section 5 of the report.

GUIDANCE NOTE PRODUCED FOR PLANNING & REGULATORY SERVICES COMMITTEE MEETING OF 14 MARCH 2023

REPORT ON APPLICATION

"Note for guidance of the Committee where the decision of the Planning and Regulatory Services Committee is contrary to the recommendations of the Director of Environmental Services in respect to a Planning Application."

Any Councillor putting forward a motion to refuse an application, contrary to recommendation, shall clearly state the reasons for refusal. These reasons should be based on policies contained in the approved Local Development Plan or some other material consideration. Time should be allowed to ensure that these reasons are carefully noted for minuting purposes.

Where Councillors put forward a motion to approve an application, contrary to recommendation, an indication should be given of any specific matters which should be subject of conditions along with reasons which should be based on policies in the approved Local Development Plan or some other appropriate consideration.

Note for guidance where the decision of the Planning and Regulatory Services Committee is to depart from the Local or Structure Plan.

Where a Councillor is convinced that there is reason to depart from Local Development Plan policy; then the Councillor's reasons for making the motion should be clearly stated for minuting purposes. Any matters which should be subject to conditions drafted subsequently by the Director of Environmental Services should be indicated. If the Committee remains of a mind to approve such an application then the whole matter will be subject to statutory procedures as apply. In such cases, Councillors should be aware that the application may require to be advertised as a departure and any objections reported to the next available meeting of the Planning and Regulatory Services Committee. It also may be necessary to convene a hearing to consider the views of objectors.

There are three potential consequences if Committee takes a decision where the proper procedures have not been followed in whole or in part. Firstly, the person aggrieved by a decision may apply to the Supreme Courts in Scotland for an Order either compelling the Council to act according to law, quashing the decision altogether or declaring a decision to be unlawful coupled with an order to prevent the decision being implemented. A referral to the Supreme Courts in these circumstances is known as applying for Judicial Review.

Secondly, in addition to the application for Judicial Review when questions of alleged failure, negligence or misconduct by individuals or local authorities in the management of public funds arise and are raised either by or with the External Auditor of the Council and where an individual can be blamed the sanctions available are:-

Censure of a Councillor or an Officer
Suspension of a Councillor for up to one year
Disqualification of a Councillor for up to five years

In the case of the Council being to blame, recommendations may be made to the Scottish Ministers about rectification of the authorities accounts. Ministers can make an order giving effect to these recommendations.

Thirdly, whilst the Ombudsman accepts that Planning authorities have the freedom to determine planning applications as they wish procedural impropriety may be interpreted as maladministration. This can also lead to recommendations by the Ombudsman that compensation be paid.

Consistent implementation of departure procedures maintains public confidence in the planning system and is consistent with the time and effort invested in preparing the Local Development Plan.

WARD 07_17

21/01163/APP
2nd August 2021

Residential development landscaping and associated infrastructure at Glassgreen Village Phase 2 Elgin South Elgin Moray for Springfield Properties PLC

Comments:

- A site visit has been carried out.
- Proposal to be reported to Committee under the scheme of delegation where the proposal exceeds 50 house units and where it falls within the category of "major development" as defined in the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009.
- Advertised for neighbour notification purposes.
- One representation received.

Procedure:

- If Members are minded to approve, a separate Section 75 legal agreement is required prior to issuing planning consent to see delivery of the Developer Obligations agreed.

Recommendation

Grant Planning Permission - Subject to following:

Conditions/Reasons

1. The development to which this permission relates must be began not later than the expiration of 5 years beginning with the date on which this permission is granted.

   Reason: The time limit condition is imposed in order to comply with the requirements of section 58 of the Town and Country Planning (Scotland) Act 1997 as amended.

2. Prior to occupation of the first dwelling a finalised landscaping maintenance schedule relating to the approved "LANDSCAPE PROPOSALS OVERALL PROPOSALS (1 of 2)" SPE 102.21 SL-01 Rev F. and "LANDSCAPE PROPOSALS OVERALL PROPOSALS (2 of 2)" SPE 102.21 SL-02 Rev F must be submitted to and approved in writing by the Council, as Planning Authority. Thereafter the landscaping must be implemented in accordance with the above approved plans and maintenance shall be carried out in accordance with the

approved landscaping maintenance schedule.

Reason: In order to ensure the final landscape maintenance arrangements are agreed prior to occupation of the dwellings.

3. The play area and equipment hereby approved must be implemented as shown on plan MO05_SL_12 REV A 'Play Area' unless otherwise agreed in writing with the Council as Planning Authority.

   Reason: In order to ensure the revised play area equipment specified is installed and to allow for any variations necessary.

4. Prior to development commencing, a phasing plan must be submitted to and approved in writing by the Council as Planning Authority detailing at what stages of build-out the various areas of structural planting, wider landscaping, street trees, bespoke benches, civic hard and soft landscaping and the play area will be provided. Thereafter the development hereby approved shall be progressed in accordance with the approved phasing plan unless otherwise approved by the Council as planning authority.

   Reason: In order to ensure the landscaping and area are provided at an appropriate phase of the development.

5. No house or flat shall be occupied until the EV charging infrastructure associated with the parking for the unit has been provided and made available for connection of an EV charging unit. Thereafter the development shall be completed in accordance with the approved details as shown on Drawing No. MO05_SL_06 Revision D 'EV Charging'. Beyond the details submitted however and prior to first occupation of any house unit, further details must be submitted to and approved by Moray Council showing:-
   a) A plan or details of how the communal charging points would work, egg, shared charging points, metered or one point per flat, no designated parking.
   b) Confirmation of the charge rate (minimum 7kW).
   c) Confirmation that charging points are all within 5m of vehicles parking.

   Reason: In the interests of an acceptable form of development and to ensure provision of infrastructure to support the use of low carbon transport, through the provision of details currently lacking from the submission.

6. No house or flat shall be occupied until the EV charging infrastructure associated with the parking for the unit has been provided and made available for connection of an EV charging unit. Thereafter the development shall be completed in accordance with the approved details as shown on Drawing No. MO05_SL_06 Revision D 'EV Charging'.

   Reason: In the interests of an acceptable form of development and the provision of infrastructure to support the use of low carbon transport, through the provision of details currently lacking from the submission.

7. Unless otherwise agreed in writing with the Council as Planning Authority, the

three 87sqm ‘retail’ units may host businesses falling within Classes 1 - Shops, Class 2 - Financial, professional and other services or Class 3 - Food and drink of The Town and Country Planning (Use Classes) (Scotland) Order 1997 as amended (or as subsequently amended by future changes to Classes 1, 2 and 3 or their equivalent).

Reason: In order to be clear to the range of uses permissible within the shop units.

8. Unless otherwise agreed in writing with the Council as Planning Authority, the 14 accessible units as indicated in the Accessible Housing Statement, must be provided in full compliance with the Accessible Housing Guidance note contained on pages 41-42 of Moray Local Development Plan 2020.

   Reason: To ensure the identified house units meet the required standard and design features to fulfil the accessible housing need for the development.

9. As part of the permission hereby granted, the 46 affordable house units (as identified on the ‘Housing Type Allocation’ plan MO05_SL_02 Rev D 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 (e.g. housing association or similar) to enable the long term delivery of affordable housing on this site; and no house development shall commence beyond Phase 3 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.

10. Unless otherwise agreed in writing with the Council as Planning Authority, the recommended ecological mitigation contained at para 4.1 and enhancement actions in para 4.2 of the “Crescent South, Elgin South, Extended Phase1 Habitat Survey and Biodiversity Action Plan must be adhered to prior to and during construction unless otherwise agreed in writing with the Council, as Planning Authority.

    Prior to development commencing, as plan must be submitted to and approved by the Council as Planning Authority showing the intended locations of hedgehog access throughout the site.

    Reason: In order to ensure the appropriate mitigation is undertaken to protect biodiversity upon the site.

11. Prior to occupation of the first dwelling, the specific details, locations and timing for provision of the public art bespoke carved/constructed benches must be

submitted to and approved in writing by the Council, as Planning Authority. The details shall include that no less than four benches will be provided, two in the civic square area, and at least 2 elsewhere in the development. Thereafter the benches installed shall be maintained and if so instructed by Moray Council, made safe and replaced with another bench of a design and material approved by Moray Council as Planning Authority.

Reason: In order that consideration can be given to the specific design of park benches to be provided.

12. Unless otherwise agreed in writing with the Council, as Planning Authority, the development shall include a total of 47 affordable house units and a minimum of 14 accessible units, with the affordable units being provided no later than the completion of the 100th house unit upon the site.

    Reason: In order to avoid any ambiguity regarding the terms of the consent, and to confirm the number of affordable and accessible housing units to be developed.

13. The approved bin and cycle storage must be fully installed prior to first occupation of any of the apartment blocks they serve.

    Reason: In order to ensure the relevant amenities are in place prior to residential occupation occurring.

14. No part of this development, termed as Phase 1C, shall be occupied until:

    a) details (which may include evidence from Transport Scotland) have been submitted to the Council, as Planning Authority to confirm that the Trunk Roads Authority has completed the upgrading and realignment of the A96 (T) Hardmuir to Fochabers section of the A96 Dualling programme;

    OR

    b) a Transport Assessment for Phase 1C (as defined within the submitted Transport Assessment) has been submitted to the Council, as Planning Authority, and that any trunk road mitigation measures necessary to off-set the impact of Phase 1C have thereafter been implemented in accordance with a timescale identified by the Transport Assessment to the satisfaction of the Council, as Planning Authority, in consultation with Transport Scotland.

    Reason: To ensure that the scale and operation of the proposed development does not adversely affect the safe and efficient operation of the trunk road network.

15. Unless otherwise agreed with the Planning Authority, in consultation with the Environmental Health Manager, the air source heat pump at the proposed dwellings shall be the Daikin Altherma H Hybrid Outdoor Unit model EJHA04AAV3, confirmed by supporting email from the applicant to the Environmental Health Section on 1st October 2021 at 09:35 hours, and the sound power level of the unit shall not exceed 58.7 dB (A), as described in page 7 of the

supporting document titled "Daikin Altherma hydrosplit heat pump Product catalogue".

Reason: To ensure that the noise source limits can be controlled in the interests of protecting local amenity.

16. Construction works (including vehicle movements) associated with the development audible at any point on the boundary of any noise sensitive dwelling shall be permitted between 0800 - 1900 hours, Monday to Friday and 0800 - 1300 hours on Saturdays only, and at no other times out with these permitted hours (including National Holidays) shall construction works be undertaken except where previously agreed in writing with the Council, as Planning Authority and where so demonstrated that operational constraints require limited periods of construction works to be undertaken out with the permitted/stated hours of working.

    Reason: To ensure that construction activity likely to impact neighbouring amenity occurs at reasonable times and can be controlled.

17. Prior to development commencing, a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing by the Planning Authority in consultation with the Environmental Health Manager. The plan shall include measures to minimise construction related noise, vibration, dust and artificial lighting. The CEMP must also detail measures to minimise the disturbance of soil during construction. Thereafter the development will be carried out in accordance with the agreed plan.

    Reason: To ensure that the construction phase is carried out so as to minimise impacts.

18. No works in connection with the development hereby approved shall commence unless an archaeological written scheme of investigation (WSI) has been submitted to and approved in writing by the planning authority and a programme of archaeological works has been carried out in accordance with the approved WSI. The WSI shall include details of how the recording and recovery of archaeological resources found within the application site shall be undertaken, and how any updates, if required, to the written scheme of investigation will be provided throughout the implementation of the programme of archaeological works. Should the archaeological works reveal the need for post excavation analysis the development hereby approved shall not be occupied unless a post-excavation research design (PERD) for the analysis, publication and dissemination of results and archive deposition has been submitted to and approved in writing by the planning authority. The PERD shall be carried out in complete accordance with the approved details.

    Reason: To safeguard and record the archaeological potential of the area.

19. Prior to development commencing, a site specific waste management plan shall be submitted to and agreed in writing by the Council, as Planning Authority. The plan shall identify likely waste sources, provisions to maximise waste reduction

and recycling, and waste separation at source during the construction and post construction phases of the development. Thereafter the development will be carried out in accordance with the agreed plan.

Reason: To ensure that waste is minimised during construction, in accordance with National Planning Framework 4 Policy 12 – Zero Waste.

20. The development hereby approved must be carried out in accordance with the "Phase 1C Elgin South Crescent South, Birnie Wood West & the Square Drainage Assessment Revision B" February 2023 and associated Drainage Layout plan MO05-ENG-600 Rev C. The drainage arrangements must be implemented.

    Reason: To ensure that the revised drainage arrangements are implemented.

21. Prior to the commencement of any part of the development, the following details shall be submitted for approval in writing by the Planning Authority in Consultation with the Roads Authority:

    a) A phasing plan (Scale 1:1000 min) showing the extents of each phase of house building and road building (including new junctions onto the C2E Birnie Road and A941:
    b) Details (Plan scale 1:1000 min) which demonstrates that no vehicular access shall be provided between the development and the existing development to the north (South Glassgreen), prior to the A941 site access and the 6.1m wide distributor road connection to the development being completed and opened to the public.
    c) Timescales for the completion of the A941 site access junction and the 6.1m wide distributor road between the development the A941 junction.
    d) A schedule of maintenance for the visibility splay areas at the site access junction onto the A941.

    Thereafter, unless otherwise agreed in writing by the Planning Authority, the development shall be completed in accordance with the approved details and timescales. A visibility splay measuring 4.5m x 215m in both directions shall be provided at the new site access junction onto the A941 in accordance with the approved drawing and the visibility splay shall be maintained at all times free from any obstruction exceeding 0.26m metres above the level of the carriageway in accordance with the agreed schedule of maintenance.

    Reason: Provision of details currently lacking to ensure roads infrastructure is provided at an appropriate stage in the development in the interests of road safety and an acceptable form of development. To enable drivers of vehicles entering or exiting the site to have a clear view so that they can undertake the manoeuvre safely and with the minimum interference to the safety and free flow of traffic on the public road.

22. Notwithstanding the details submitted for the proposed Birnie Road Upgrades (Drawing MO05-ENG-550 Rev C) which are not accepted (Do not show the full extent of the works required i.e. including tie in details to the existing road at the north and south). No development shall commence until the following details have

been submitted for approval in writing by the Planning Authority in consultation with the Roads Authority:

a) Plans (Scale 1:500 min) which show the proposed Birnie Road widening and improvement works including the tie in details for the existing road at the northern and southern ends.
b) Details (Plans scale 1:1000 min) showing any changes to the existing speed limits.
c) Details of all changes/modifications to the design, to be informed by a Stage 1/2 Road Safety Audit, for the proposed junction and, any other works proposed on Birnie Road.
d) A post construction review and Road Safety Audit for the section of Birnie Road between the southern extent of the proposed Birnie Road Improvements or site access visibility splay (whichever is furthest south) and the Birnie Road/Sandy Drive/Gleneagles Drive roundabout).
e) Timescales for the completion of the Birnie Road Upgrades.

Thereafter, unless otherwise agreed in writing by the Planning Authority, the development shall be completed in accordance with the approved details and timescales.

Reason: Provision of details currently lacking to ensure roads infrastructure is provided at an appropriate stage in the development in the interests of road safety and an acceptable form of development.

23. Prior to any development works commencing, a schedule of maintenance for the visibility splay areas at the site access junctions onto the C2E Birnie Road and A941 shall be submitted to and approved by the Council, as Planning Authority in consultation with the Roads Authority. Thereafter the development shall be completed in accordance with the approved details and visibility splays measuring 4.5m x 120m to the north and 4.5m x 215m to the south shall be provided at the new site access junctions onto the C2E Birnie Road and 4.5m by 215m in both directions at the site access junction onto the, prior to any works commencing on the respective site access junctions (except for those works associated with the provision of the visibility splay); and

    Thereafter, the visibility splay shall be maintained at all times free from any obstruction exceeding 0.26m metres above the level of the carriageway in accordance with the agreed schedule of maintenance.

    Reason: To enable drivers of vehicles entering or exiting the site to have a clear view so that they can undertake the manoeuvre safely and with the minimum interference to the safety and free flow of traffic on the public road.

24. Notwithstanding the details submitted for the site layout and cycle path, clarification is required such that, no development shall commence until the following details shall be submitted for approval in writing by the Planning Authority in Consultation with the Roads Authority:
    a) A Plan (Scale 1:1000min) showing the route of a 3 metre cycle path connecting from the existing cycle path at the southern boundary of the

Crescent North development eastwards to its intersection with the 6.1m wide distributor road and then continuing eastwards between the 6.1m road and the advanced planting area and linking to the existing/committed cycle path network to the northeast within the South Glassgreen development.

b) Timescales for the completion of the cycle path.

Thereafter, unless otherwise agreed in writing by the Planning Authority the development shall be completed in accordance with the approved details and timescales.

Reason: Provision of details currently lacking or unclear from the submission, to ensure active travel infrastructure is provided at an appropriate stage in the development in the interests of road safety and an acceptable form of development.

25. Notwithstanding the details submitted for retaining walls adjacent to the public road on Plots 16 and 143 (Levels Layout Plans (Drawings EL(--)-ENG-300 and 301 Rev D)), which are not accepted. No development shall commence until the following details have been submitted for approval in writing by the Planning Authority in Consultation with the Roads Authority:

a) Plan(s) (scale 1:500min) including the road levels and cross sections to demonstrate that no part of the public road shall be retained within the development.

Thereafter, unless otherwise agreed in writing by the Planning Authority the development shall be completed in accordance with the approved details and timescales.

Reason: Provision of details currently lacking or unclear from the submission in the interests of road safety and an acceptable form of development.

26. Notwithstanding the details submitted for the shared spaces, roads and paths within the square (including the east and south sides of the square), clarification of details between drawings MO05-ENG-500 Rev F (Adoption Layout), MO05_SL_01 Rev B (Site Layout), MO-05_SL_04 Rev C Roads Hierarchy) is required. No development shall commence until details (Plans scale 1:500 min) have been submitted for approval in writing by the Planning Authority in consultation with the Roads Authority which confirm the following:

a) The extents of the roads (including paths/cycle paths/verges) to be provided on the east and south sides of the square as part of the current application.

b) The extents of a continuous 3 metre wide (minimum) cycle path north-south including the section through the square and the road crossings to the north and south.

Thereafter unless otherwise agreed in writing by the Planning Authority the development shall be completed in accordance with the approved details.

Reason: Provision of details currently lacking or unclear from the submission to

ensure an acceptable form of development, the provision of active travel infrastructure and in the interests of road safety.

27. Notwithstanding the details submitted for the refuse collection area for Plots 124-135 which are not acceptable (lack of a footway crossing of the swale to allow for collection of refuse from the roadside). No development shall commence until details (Plans scale 1:500 min) have been submitted for approval in writing by the Planning Authority which confirm the following:

    Refuse collection arrangements for plots 124-135 which are accessible from the road side directly without crossing through the swale.

    Thereafter the infrastructure required to facilitate the refuse collection arrangements shall be provided in accordance with the approved details.

    Reason: The submission of additional information to ensure an acceptable form of development and the provision of infrastructure required for site servicing and refuse collection.

28. Notwithstanding the details submitted for parking associated with Plots (11, 10, 36, 102 and 140) which are unacceptable (visibility from parked vehicles, parking space dimensions and walls/fences/hedges) Prior to the commencement of development on plots (7 or 10), 11, 36, 68, 102, (140 or 146) details shall be submitted to demonstrate the provision of acceptable parking arrangements including visibility requirements and details to confirm wall/fence/hedging positions and dimensions and parking space dimensions.

    Thereafter the development of the plots shall be completed in accordance with the approved details unless otherwise agreed in writing by the Planning Authority in consultation with the Roads Authority.

    Reason: The provision of details currently unacceptable or lacking from the submission to ensure adequate visibility is provided for vehicles entering the public road and parking is provided in accordance with the Moray Council Parking Standards and in the interests of road safety and an acceptable form of development.

29. Notwithstanding the details submitted for the roads and footways between plots 136-139 and 176-179 further clarification is required between drawings MO05-ENG-500 Rev F (Adoption Layout), MO05_SL_01 Rev B (Site Layout), MO-05_SL_04 Rev C Roads Hierarchy). No development shall commence until details (Plans scale 1:500 min) have been submitted for approval in writing by the Planning Authority in consultation with the Roads Authority which confirm the extents of the adoptable road to be provided including verges/footways. Thereafter unless otherwise agreed in writing by the Planning Authority the development shall be completed in accordance with the approved details.

    Reason: Provision of details currently lacking or unclear from the submission to ensure an acceptable form of development, the provision of active travel infrastructure and in the interests of road safety.

30. No dwelling or retail unit shall be completed until the following details have been submitted for approval in writing by the Planning Authority in consultation with the Roads Authority and the Public Transport Unit Manager.

    a) Details (Plans 1:1000 min) showing the minimum extents of the roads and paths required in order to provide access for bus services.
    b) Timescales for the completion of the minimum roads and paths infrastructure required and timescales for the commencement of the 100th house plot within the development.
    c) Details (Plans 1:250 min and Specifications) showing the design or make and model of enclosed bus shelter and flags to be provided at the two bus stop locations within the development.

    Thereafter, prior to the commencement of the 50th house plot within the development, evidence (written agreement with the Roads Authority) shall be submitted to confirm the level of bus service provision to be provided. (Public Transport minimum service requirements shall be based on the provision of a service which connects the development to Elgin Town Centre, operates from 7.00am to 6.00pm, Monday to Friday inclusive, and from 8.00am to 6.00pm on Saturday and is based on a minimum frequency of 2 buses per hour and a minimum duration of two years or an equivalent to be agreed).

    Thereafter, the bus stop infrastructure, roads required to access the infrastructure from the A941 and bus service(s) shall be provided in accordance with the approved details and timescales or prior to the commencement of the 100th house plot within the development.

    Reason: To ensure the satisfactory provision of public transport infrastructure to serve the development.

31. No works shall commence on any area proposed for development until a Construction Traffic Management Plan for the respective area has been submitted to and approved in writing by the Council, as Planning Authority in consultation with the Roads Authority. The Construction Traffic Management Plan shall include the following information:
    a) duration of works;
    b) construction programme;
    c) estimated number of vehicle movements (i.e. materials, plant, staff, components);
    d) anticipated schedule for delivery of materials and plant;
    e) full details of any temporary construction access;
    f) full details of construction traffic routes from the A941 and A96 to the site, including any proposals for temporary haul routes and routes to be used for the disposal of any materials from the site;
    g) measures to be put in place to prevent material being deposited on the public road;
    h) measures to be put in place to safeguard the movements of pedestrians;
    i) traffic management measures to be put in place during works including any specific instructions to drivers; and

j) parking provision, loading and unloading areas for construction traffic.

Thereafter, the development shall be implemented in accordance with the approved details.

Reason: To ensure an acceptable form of development in terms of the arrangements to manage.

32. No development shall commence until evidence has been submitted in writing to confirm that the statutory process (Traffic Regulation Order) required to relocate the existing 40mph speed limit on Birnie Road to the south of the proposed site access junction has been commenced. Thereafter, unless otherwise approved in writing by the Planning Authority in consultation with the Roads Authority, the site access junction shall not be completed or opened to the public until the statutory process and all works required to relocate the speed limit have been completed in accordance with the approved details.

Reason: In the interests of Road Safety.

33. Parking provision for houses shall be provided at the following rates:

1 Bedroom = 1 space
2 -3 Bedrooms = 2 spaces
4 or more bedrooms = 3 spaces

Parking for flats shall include provision for secure, weatherproof cycle storage for 1 cycle space per flat as a minimum. Parking shall be provided prior to the completion of each house or flat which it is associated with and thereafter retained and available for that purpose unless otherwise agreed in writing by the Planning Authority in consultation with the Roads Authority.

Reason: To ensure the permanent availability of the level of parking necessary for residents/visitors/others in the interests of an acceptable development and road safety.

34. No new boundary fences, hedges, walls or any other obstruction whatsoever over 0.6m in height and fronting onto the public road shall be within 2.4m of the edge of the carriageway.

Reason: To enable drivers of vehicles entering or exiting the site to have a clear view so that they can undertake the manoeuvre safely and with the minimum interference to the safety and free flow of traffic on the public road.

35. No development shall commence until a Travel Information Pack, which sets out opportunities for travel by foot, cycle and public transport, has been submitted to, and approved in writing by the Council, as Planning Authority in consultation with the Roads Authority. The Travel Information Pack shall include:

a) information on routes for pedestrians and cyclists to access local facilities;
b) information on the provision of bus services serving the development;

c) details of how to access personal Travel Planning and of incentives to travel by foot, cycle and public transport; and
d) details of the programme for updating the Travel Information Pack as the development progress, to be carried out annually.

The approved Travel Information Pack shall thereafter be provided to each dwelling as they are completed from the date of first completion of any part of the residential development.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment.

36. No development shall commence on any area proposed for development until details have been submitted to and approved in writing by the Council, as Planning Authority in consultation with the Roads Authority regarding the formation of any required/proposed construction access(es) (which includes any temporary access(es) to the area proposed for development from any public road. The details shall include:

a) a drawing (scale 1:500 minimum) regarding the location and design specifications of the proposed access(es);
b) specification of the materials used for the construction access(es);
c) all traffic management measures required to ensure safe operation of the construction access(es);
d) details including materials for the reinstatement of any temporary construction access(es); and
e) details regarding the timescale for the opening up and closure of any temporary access(es) together with the time-period over which the temporary access(es) will be used.

Thereafter, the works shall be provided in accordance with the approved details.

Reason: To ensure an acceptable form of development in terms of the arrangements to manage traffic during construction works at the site.

Reason(s) for Decision
The Council's reason(s) for making this decision are:-

The proposal accords with the relevant policies of National Planning Framework 4 and Moray Local Development Plan 2020, and there were no material considerations that would indicate otherwise.

List of Informatives:

THE DEVELOPMENT MANAGEMENT & BUILDING STANDARDS MANAGER has commented that:-

A Building Warrant will be required for the proposals. Should you require further assistance please contact the Building Standards Duty Officer between 2pm and

4pm or telephone on 03001234561. No appointment is necessary. Alternatively e-mail buildingstandards@moray.gov.uk

This planning permission is subject of a Section 75 legal agreement covering the Developer Obligations requirements.

THE ABERDEENSHIRE ARCHAEOLOGY has commented that:-

The exact mitigation is to be agreed with the archaeology service, but may incorporate an archaeological metal detector survey as well as a trial trenching evaluation (trench plan to be agreed with the archaeology service, in order to target possible features identified on aerial photography). These works should be undertaken by a suitably qualified archaeological contractor. It is noted that a Written Scheme of Investigation has been submitted with the application. The archaeology service would ask that an updated WSI is produced, given that the submitted document is dated 2015, to include a trench location plan (to be agreed with archaeology service, as noted above). The archaeology service also notes that the submission of the WSI in advance does not negate the need for the above condition to be applied should the application be approved.

THE TRANSPORTATION MANAGER has commented that:-

Whilst the current application drainage arrangements and locations of proposed SUDS ponds are acceptable in principle (subject to detailed design/approval for the roads drainage through RCC) the routing of the pipework linking the SUDS ponds to the current application which are shown along indicative road alignments which would form part of any future applications and have therefor not been assessed for the current application. The suitability of the proposals with respect of any future road alignment and levels is not approved and Transportation cannot confirm they will be acceptable.

Electric Vehicle (EV) chargers and/or associated infrastructure shall be provided in accordance with Moray Council guidelines. Cabling between charging units and parking spaces must not cross or obstruct the public road including footways. Infrastructure provided to enable EV charging must be retained for this purpose for the lifetime of the development unless otherwise agreed in writing by the Planning Authority. Guidance on Electric Vehicle (EV) Charging requirements can be found at: http://www.moray.gov.uk/downloads/file134860.pdf

Before commencing development, the applicant is obliged to apply for Construction Consent in accordance with Section 21 of the Roads (Scotland) Act 1984 for new roads. The applicant will be required to provide technical information, including drawings and drainage calculations, and provide a Road Bond to cover the full value of the works in accordance with the Security for Private Road Works (Scotland) 1985 Regulations. Advice on this matter can be obtained from the Moray Council web site or by emailing transport.develop@moray.gov.uk

The applicant shall provide any drawings and meet the costs required for the preparation of any Traffic Regulation Orders.

Construction Consent shall include a CCTV survey of all existing roads drainage to be adopted and core samples to determine the construction depths and materials of the existing road. Any further requirement for Road Safety Audit for the modifications to the existing public road shall be determined through the Roads Construction Consent process or subsequent to the road construction prior to any road adoption.

Requirements for any traffic calming, road construction materials and specifications, tree root containment and any SUDs related to the drainage of the public road must be submitted and approved through the formal Roads Construction Consent process.

Planning consent does not carry with it the right to carry out works within the public road boundary and the applicant is obliged to contact the Transportation Manager for road opening permit in accordance with the Roads (Scotland) Act 1984. This includes any temporary access joining with the public road.

If required, street furniture which needs to be repositioned will be at the expense of the developer. Advice on these matters can be obtained by e-mailing transport.develop@moray.gov.uk

Street lighting will be required as part of the development.

Private Roads - A responsible party, constituting the road manager, must be nominated for any private road and this information included within the National Gazetteer through the Scottish Road Works Register (SRWR).

Public utility apparatus may be affected by this proposal. Contact the appropriate utility service in respect of any necessary utility service alterations which have to be carried out at the expense of the developer.

No building materials/scaffolding/builder's skip shall obstruct the public road (including footpaths) without permission from the Roads Authority.

The applicant shall free and relieve the Roads Authority from any claims arising out of their operations on the road or extension to the road.

The Transportation Manager must always be contacted before any works commence. This includes any temporary access, which should be agreed with the Roads Authority prior to work commencing on it.

No retaining structures or embankments shall be constructed along the edge of the road, whether retaining the public road or ground adjoining the public road without prior consultation and agreement of the Roads Authority.

LIST OF PLANS AND DRAWINGS SHOWING THE DEVELOPMENT	
Reference No. Version No.	**Title/Description**
MC05_LP_01	Location plan
MO05-ENG-500 F	Adoption layout
2018_ff_901	Affordable House type range
EL02_T3-V1(C)901	Glamis and Finaven flats - no shop
	Horizontal 2 bike locker
1339DR-901 G	Braemar- elevations and floor plans
2019 AA_901	Semi combinations - elevations and floor plans
MC/2018/CS/01 B	C type semi - elevations and floor plans
MO05-ENFG-210	Indicative utility route
EL02-ENG-110	Indicative bridge layout
EL02-ENG-115	Indicative bridge section
MO05_PL_CF01	Moray Dunbar - elevations and floor plan
SR-901	Optional sun lounge details
SPE.103.21AWP-01	Advanced woodland planting
SPE.103.2 1AWP-02	Advanced woodland planting
SPE.102.21 LA-01	Landscape analysis
L(92)0001	Glassgreen advanced planting
EL02_ENG-530	Road long sections
EL02-ENG-570	Road construction details
EL02-ENG-170 A	Culvert extension A941
280421-00	Phase 1 TA 2021 Part -13
	Phase 1 TA 2021 Part -15
	Phase 1 TA 2021 Part -16
	Phase 1 TA 2021 Part -20
	Phase 1 TA 2021 Part -21
MC05_SL_09 C	Key buildings
MO05-ENG-200 D	Swept path analysis
1202dt(AS)901 D	Roslin - elevations and floor plans
MO05_SL_11 B	Roof finishes
	Parking court
MC05_SL_05 C	Parking mitigation
MC05_SL_04 C	Roads hierarchy
MO05_ENG_100	Pre development flow arrows
MC/2018/Y/OPP/01	Y Type detached OPP - elevations and floor plans
MO05-ENG-558 F	Birnie Road Visibility
EL(--)- ENG-300 D	Levels layout sheet 1 of 2
MO05-ENG-530 B	Long sections
2016 CSIS_901	2018 Type CSCS - elevations and floor plans
MC/2018/CS/01 B	CS Type semi-detached - elevations and floor plans
2020DST-DST-901	Deanston semi-combinations - elevations and floor

	plans
1668dg(AS)901A	Dunning AS - elevations and floor plans
MO05_SL_01 B	Site layout
MO05-ENG-270 A	Sections and details
MO05_SL_07 C	Bin collection
MO05-ENG-260 B	Birnie Road Swept Path
MO05-ENG-550 C	Birnie Road Upgrades
MO05-ENG-250 D	Bus Swept Path
MO05_SL_08 C	Character Areas
MO05-ENG-281	Corner Visibility
MO05_SL_13	Cycles Stores
MO05-ENG-600 C	Drainage layout
MO05-ENG-210 A	Utilities layout
MO05-1_DEANSTON_PL91-96	Deanston - elevations and floor plans
MO05_SL_12	Play area
MO05_APT_01	Alba house type - floor and roof plan
MO05-ENG-690	SUDs basin construction details
A-1798dt(AS)901	Kincraig (AS) - elevations and floor plans
MO05-ENG-610 A	Drainage arrangements
MO05-ENG-691	SUDs construction details
1104dt(AS)901 C	Lauder - elevations and floor plans
AB02_PL_CF01	Cottage Flats (Block of 4) - elevations and floor plans
MC05_SL_06 D	Electric vehicle charging
MC05_SL_02 D	House type allocation
SPE 102.21 SL-03 B	Parking and landscaping strategy
1237dt(--)901 B	Nairn - elevations and floor plans
MC05_SL_13	Bike store
SPE 102.21 SL-02 F	Landscape proposal (2 of 2)
SPE 102.21 SL-01 F	Landscape proposals (1 of 2)
SPE 102.21 SL-03 E	Landscape proposals - The Square
MC05_ APT_02	Plots 115-131 - elevations and cross sections
MC05_ APT_03	Plots 105 - 114 - elevations and floor plans
T3R(S-GA)901 A	T3R(S-GA) - elevations and floor plans
MO05-ENG-531	Long sections
T3-V1(C-RU)901 A	T-flats: T3-V!(C-RU) - elevations and floor plans
MC/2016/A/02 A	Cottage flat A type - elevations and floor plans
2019 AA_901	2019 Types AA - elevations and floor plans
1224dt(AS)901 H	Arden (AS) - elevations and floor plans
950sd(AS)901 E	Ardmore - elevations and floor plans
652/757cf(--)901 G	Auldearn - elevations and floor plans
1287dt(as)901 C	Balerno - elevations and floor plans

MO06_BINSTORE	Bin store layout
MC/2018/C/OPP	C Type detached OPP - elevations and floor plans
1432dt(AS)901 E	Crail (as) - elevations and floor plans
1410dt(AS)901 E	Cramond - elevations and floor plans
1932ct(AS)901 F	Culbin (as) - elevations and floor plans
1073sd(--)901 A	Cupar semi - elevations and floor plans
2018 FF_901	2018 Types FF - elevations and floor plans
MC/2018/K/OPP/01	K Type detached OPP - elevations and floor plans
1653dt-F(AS)901 A	Kintore -FA(as) - elevations and floor plans
EL(--)- ENG-301 D	Levels layout sheet 2 of 2
MO05_SL_08	Material finishes
ED13630-c-301C	Roundabout
MO05-ENG-160f	Junction arrangement
MO05_APT_01	Roof and floor plans
MO05_SL_01 B	Site plan
MO05_SL_08 A	Standard finishes

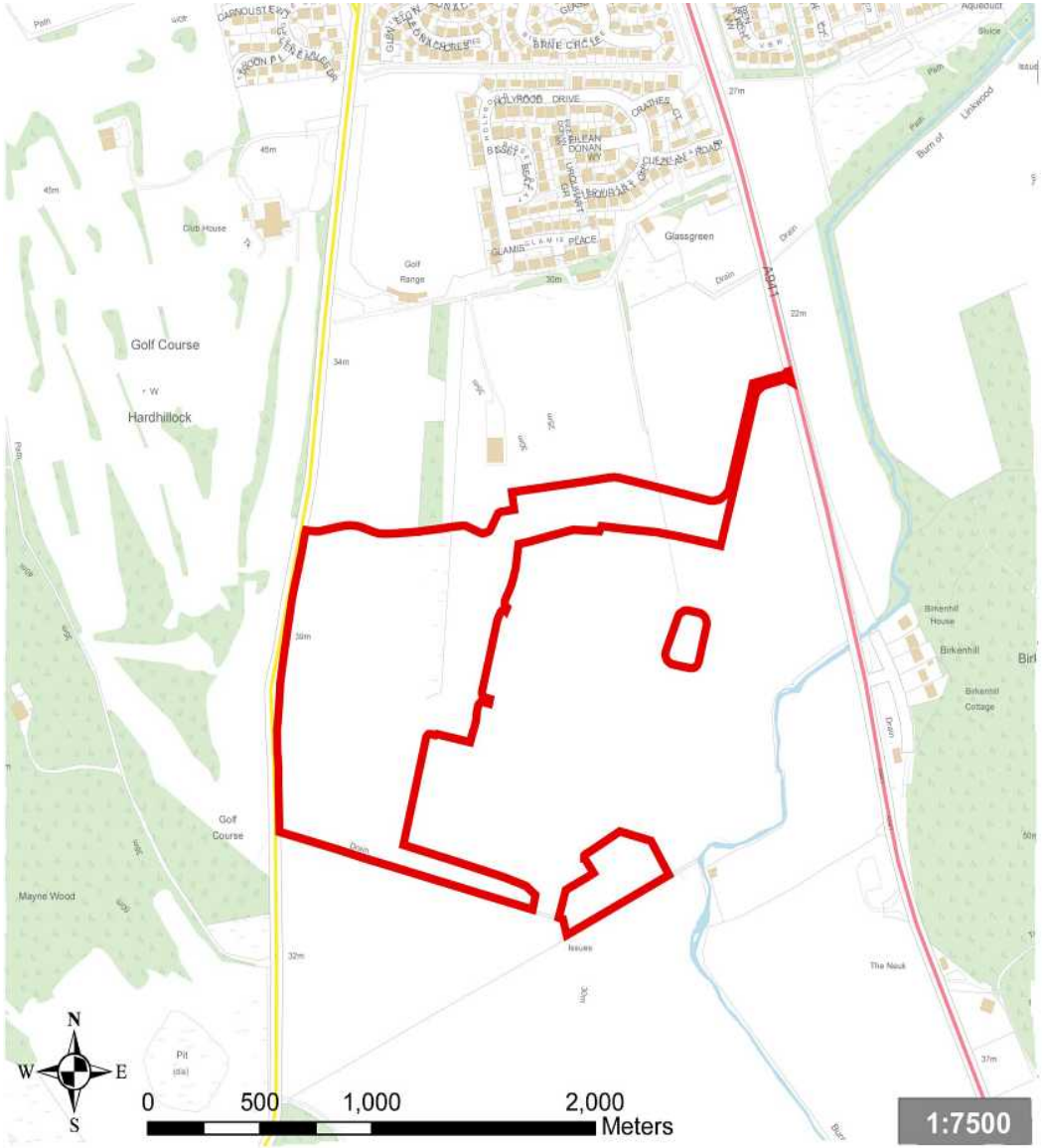
PLANNING APPLICATION COMMITTEE SITE PLAN

Planning Application Ref Number:
21/01163/APP

Site Address:
Glassgreen Village Phase 2
Elgin South Elgin

Applicant Name:
Springfield Properties PLC

Location Plan




A541 road
South Gassgreen development
Proposed Future School Site
Areas subject to Future Planning Applications
Crescent North development
Existing road (Brine road) as per survey carried out by Mace (2015)

Site Plan

Landscaping plan

Civic Space

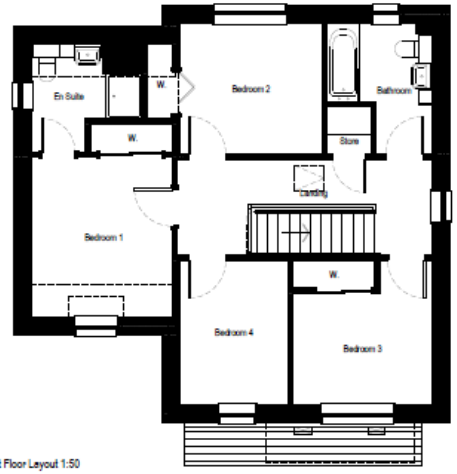
THE PROPOSED SQUARE LANDSCAPE PLAN 1:200

THE SQUARE - VISUALISATION

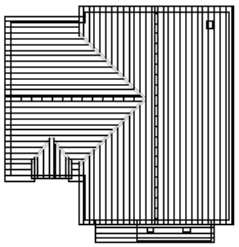
A941 Junction

Arden detached

Ground Floor Layout 1:50

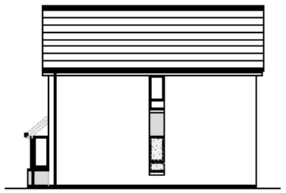


First Floor Layout 1:50



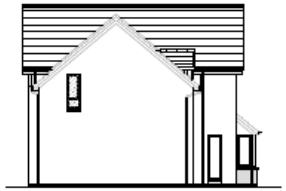
Roof Plan 1:100

Front Elevation 1:100



Side Elevation 1:100

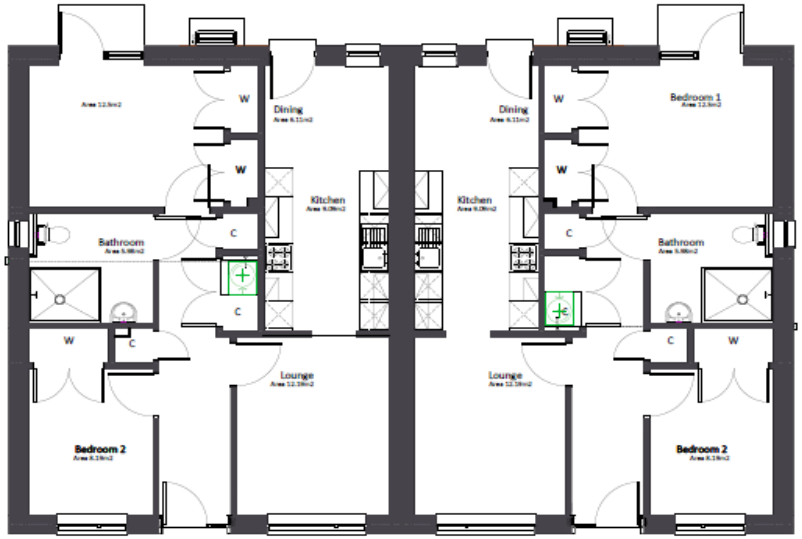
Rear Elevation 1:100



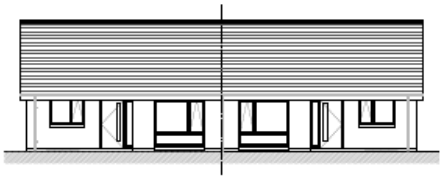
Side Elevation 1:100

3D Illustration

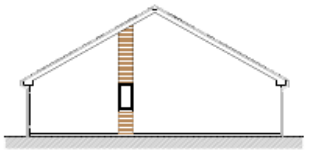
CS type semi bungalow



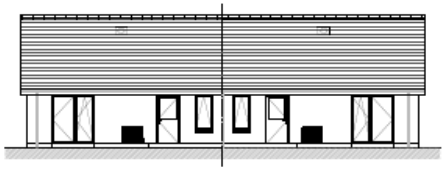
2018 CS Type Semi Detached
Ground Floor Plan
Internal Floor Area: 72.75sqm



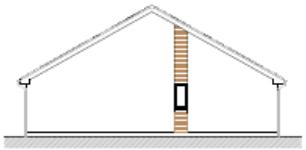
2018 CS Type Semi Detached
Front Elevation



2018 CS Type Semi Detached
Side Elevation



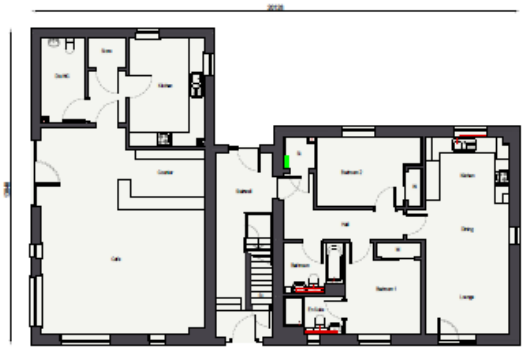
2018 CS Type Semi Detached
Rear Elevation



2018 CS Type Semi Detached
Side Elevation

Auldearn Accessible GF

Flats and shops



Looking North along Birnie Road

View from south looking north east

North edge of site looking south

PLANNING APPLICATION: 21/01163/APP

In the event that a recommendation on this planning application is overturned the Committee is reminded of the advice contained on the front page of the agenda for Reports on Applications

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1. **THE PROPOSAL**

- Erect 186 houses inclusive of 47 affordable housing units. Of the 139 private houses, more than 10% are accessible housing (14 units) with the applicant intending to provide 23 accessible units within the private housing.
- The houses consist of a mix of detached, semi-detached and flatted residential units. Several of the flatted units are accommodated within 3 storey flatted apartments.
- There are eight character areas proposed providing a mix of different building finishes and materials to each of those areas. Beyond the character area, at key junctions/entrances to the development there are 17 Key Buildings will also have utilise distinct materials from adjoining buildings.
- A range of different material and colours have been selected for the roof tiles, wall render, stone cladding, wall cladding, window and doors finishes. Driveway and paths within plots will also have different colour paving bricks, and the choice of street trees, hedging and shrubs will vary between character areas.
- The private housing is a mix of detached and semi-detached two storey housing, and the private flat apartments are a mix of different compositions including two and three storey buildings. The affordable housing hosts to a mix of detached, semi-detached, terraced and flatted properties. Several of the affordable houses are also single storey.
- 3 retail/commercial units, each of 87sqm in area. These are located on the ground floor of the apartment blocks which sits upon the west side of the proposed civic space.
- A play area is proposed within the south side of the proposed civic square, which contributes to formation of civic space/focal point for the development. Vehicular access to the roadways on the south and east sides of the square to be limited closest to the play area.
- New junction with ghost turning lanes onto the A941. This road way also links into previously approve areas of housing to the north.
- A junction onto Birnie Road is also proposed which would see the speed limit moved further south.
- A variety of surface water drainage infrastructure is proposed including 3 SUDS basins and various swales.

2. **THE SITE**

- There are no national, regional or local environmental designations covering the site.
- The site is currently open agricultural land, with a long established bund running along the southern side of the site, separating it from the land to the south. There are no trees upon the site.
- The overall site size is 13.6 hectares, inclusive of the access link to the A941 to the north east of the main area of the development.
- The site is bound to the north by newly constructed housing, to the east by the farmland and the A941, to the south by open farmland and to the west by the Thomshill/Birnie Road. A golf driving range lies south west of the site also.
- The site lies within Moray Local Development Plan 2020 (MLDP) Elgin designation LONG2, which is further informed by the updated Elgin South Masterplan which covers this area.
- The site had some records of surface water flooding upon the site. There are no water courses on the site, but it is bound to the south by an agricultural drainage ditch flowing west to east. An agricultural bund lies within the site along it southern boundary.

3. **HISTORY**

Relevant history across Elgin South

16/01244/APP - Phase 1 of Elgin LONG2 south to include 870 houses neighbourhood uses including Classes 1 shops 2 financial professional & other services 3 food & drink 4 business 8 residential institutions 10 non-residential institutions Moray Sport Centre (with provision for indoor & outdoor recreation) two primary school sites and associated infrastructure (transport drainage & open space) and landscaping at Elgin South, Elgin, Moray. Approved by Committee on 10 May 2018 following conclusion of the legal agreement.

18/01209/APP - Application under Section 42 to vary condition 1 of planning consent 16/01244/APP to maintain provision for 870 houses (as approved) but vary phasing design and site layout details i.e. adjust Phase 1A boundary (western most part of Phase 1A within Crescent North and South Glassgreen character areas) to provide 50 affordable homes together with consequential revisions to boundaries of Phase 1D (South Glassgreen) and eastern most part of Phase 1A (Meadows North character area) and Phase 1C (Meadows East character area) revise mix of homes (including site layout and new Braemar and Lauder house types) within Crescent North and South Glassgreen character areas revise layout and reduce number of houses by 18 units within Village Garden character area to accommodate revision to alignment gas pipeline revise numbers and mix of houses including site layout within Village Core and Meadows East character areas to accommodate 18 homes relocated from Village Garden at Elgin South, Elgin Moray. Approved by committee in 15/05/19.

18/01603/S75 - Section 42 application to vary the phasing condition of Proposed modification of planning obligation (associated with application

16/01244/APP) for Phase 1 development at Elgin LONG 2 South to apply to development occurring under planning applications 16/01244/APP and 18/01209/APP at Elgin South LDP2015 Long 2 Elgin Moray. Concluded in May 2019.

Of relevance to this application is the adoption of the updated Elgin South Masterplan, adopted by Moray Council in August 2021, which altered the phasing and detail of the previous Elgin South Masterplan and the phasing as approved under 18/01209/APP.

4. POLICY

National Planning Framework 4
NPF1 - Tackling the Climate
NPF2 - Climate mitigation and adaptation
NPF3 - Biodiversity
NPF4 - Natural Places
NPF5 - Soils
NPF6 - Forestry, woodland and trees
NPF7 - Historic assets and places
NPF8 - Green belts
NPF12 - Zero waste
NPF13 - Sustainable transport
NPF14 - Design, quality and place
NPF15 - Local living
NPF16 - Quality homes
NPF18 - Infrastructure first
NPF19 - Heating and cooling
NPF20 - Blue and green infrastructure
NPF21 - Play, recreation and sport
NPF22 - Flood risk
NPF23 - Health and safety
NPF24 - Digital Infrastructure
NPF27 - City, town, local community centres
NPF28 – Retail

Moray Local Development Plan 2020
PP1 Placemaking
PP2 Sustainable Economic Growth
PP3 Infrastructure and Services
DP1 Development Principles
DP2 Housing
DP3 Long Term Land Reserves
DP5 Business and Industry
EP2 Biodiversity
EP4 Countryside Around Towns
EP5 Open Space
EP6 Settlement Boundaries
EP8 Historic Environment
EP12 Management and Enhancement Water
EP13 Foul Drainage

EP14 Pollution Contamination Hazards
Elgin - R20 Glassgreen, Elgin South
Elgin - LONG2 Elgin South
Elgin ENV4 - Sports Areas

5. **ADVERTISEMENTS**

5.1 Advertised for neighbour notification purposes.

6. **CONSULTATIONS**

Housing Strategy and Development Manager - Amendments were sought to the configuration of parking as part of the Quality Audit process.

Transport Scotland - Condition requiring clarification on future development attached, and need to consider by-pass triggers.

Scotland Gas Networks Ltd - Initially requesting further input regarding working distances from the high pressure gas main to the east, but following further clarification of building densities and distances, no concerns were raised.

Environmental Health Manager - Approve subject to conditions relating to noise emissions from air source heat pumps, working hours and the need for a Construction Environment Management Plan.

Contaminated Land - No objection.

Transportation Manager - Approve subject to a number conditions and informatives. Realignment works required on Birnie Road and re-positioning of the site access further to the south.

Scottish Water - No objections, letter containing general advice forwarded to applicant.

Strategic Planning and Development –

Introduction

The site is located within an area of land identified as Glassgreen Village within the Elgin South Masterplan. A masterplan was prepared for the wider Elgin South area and the LONG2 designation which covers this area of land in the Moray Local Development Plan (MLDP) 2020 and provides a strategic framework for its growth which all proposals must comply with.

Due to land ownership constraints of the eastern side of LONG2 (R19 Easter Linkwood and Linkwood), the Elgin South Masterplan was revised and approved at the Planning and Regulatory Services Committee on 3 August 2021. The Housing Land Audit (HLA) 2021 which was approved at the same committee confirmed that Elgin R19 Easter Linkwood and Linkwood are

considered to be constrained which results in the reduction of 611 units from the effective supply in Elgin. The approved HLA confirmed the release of land on the western village (Glassgreen) to reflect the phasing in the masterplan for which this application falls within.

The revisions included changes to the phasing which would see development phases in the western village being brought forward earlier to ensure that there was an effective supply of housing land available. In addition to this the revised masterplan updated the character areas and design codes, identified a new neighbourhood hub with community facilities, and identified a larger school site for the proposed Glassgreen primary school which increased to 2.5ha.

This application proposes 186 housing units and three 87m2 commercial units.

National Planning Framework (NPF4)

NPF4 was adopted and published on 13 February 2023 and now forms part of the Local Development Plan for Moray. The NPF is a key part of the new planning system in Scotland, which is plan-led and decisions on planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

A significant amount of work was under taken throughout the determination of this application by Officers and the applicant to ensure it complies with all MLDP policies which is reflected in it scoring “green” in all categories in the accompanying Quality Audit (QA). Notwithstanding this the application is still required to be assessed against NPF4 given that it is now adopted. However, in summary the proposal is deemed to comply with all relevant NPF4 and MLDP policies.

A brief summary will be provided against each relevant policy in this response.

PP1 Placemaking, DP1 Development Principles

Throughout the determination of this application a number of revisions were made to the layout in order to comply with PP1 Placemaking and the Elgin South Masterplan. A QA was undertaken which accompanies this response which reflects the changes made to the layout. The QA scored “green” in all categories showing that the proposal fully complies with Policy PP1 Placemaking.

NPF4 Policy 14 Design, Quality and Place

Policy 14 seeks to create healthy pleasant, distinctive, connected, sustainable and adaptable places. To achieve this proposals must meet the six qualities of successful places as set out in the policy and supporting appendix.

As stated, the application was subject to a QA which assessed the proposal against Policy PP1. Policy PP1 contains all of the key elements of Policy 14 as well as extra requirements to ensure that quality neighbourhoods are delivered.

The application was deemed to fully comply with PP1 which resulted in it scoring "green" in all categories in the accompanying QA. As such it is therefore deemed to comply with Policy 14 and all of the six qualities of successful places.

Mixed Use

The Elgin South Masterplan seeks to provide a mixed use neighbourhood that provides good local facilities for residents to use. The principle of Local Living and 20 minute neighbourhoods is a key pillar of NPF4 which seeks to create connected and compacted neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home.

The application site encompasses part of "The Square" character area as identified in the masterplan. A key element of this character area and the wider western village was the provision of a square or "neighbourhood hub". The masterplan requires this open space to be fronted by key buildings as well as providing mixed use on the ground floor to ensure that facilities are provided to support the new neighbourhood and the local living concept.

The Council commissioned a retail study which was approved by the Planning and Regulatory Services Committee as a material consideration on 4 April 2022. This was to inform the retail and commercial floorspace necessary to support 20 minute neighbourhoods for strategic growth areas across Moray. The study set out the following recommendation for Elgin South and has been approved as a material consideration. In summary;

- Total floorspace in each of the two villages centres should be comparable to Southfield Drive i.e. in the region of 1000-1250 sqm Gross Floor Area (GFA);
- Initial commercial space (ca 300-400 sqm GFA) could be provided by the completion of the 450th dwelling for each development area (i.e. east and west villages);
- The convenience store format should be provided by the completion of the 900th dwelling for each development area.

It is acknowledged that the application being assessed only encompasses part of the central square. In line with the masterplan requirements three 87 sqm units will be provided for potential retail/commercial uses.

While the provision of this initial space is slightly under the 300 – 400 sqm identified in the retail study it is deemed to be acceptable in this instance given that future phases around the square will be forthcoming to ensure that the square will become a focal point of the development.

Although it is outwith this application any future phase application must provide a 400 sqm convenience store as per the recommendations of the retail study. While any future application cannot be prejudged, failure to provide these future facilities will be contrary to NPF4 and the principles of local living, the Elgin South Masterplan, and the approved retail study.

NPF4 – Policy 15 Local Living and 20 minute neighbourhoods

Policy 15 seeks to support local living by creating new neighbourhoods that are compact and well connected where people can meet the majority of their daily needs within a reasonable distance of their home.

As stated above the Elgin South Masterplan embodied this policy intent from the outset through the creation of three villages, good active travel connections, and the requirement for the provision of local facilities such as schools, shops, and other community facilities such as a nursery. This is supported by the approved retail study that was commissioned to provide clarity and detail on what provision must be provided.

As above, the applicant is providing three 87 sqm units for mixed use opportunities. Given this is one phase of the wider village this is acceptable in this instance and complies with the aims of Policy 15.

However, as stated and although it is not a consideration as part of the determination of this application a 400 sqm convenience store must be provided in the next phase to ensure that the aims of the masterplan and retail study are provided. Failure for this to be facility provided in future phases would be contrary to NPF4 and the Elgin South Masterplan and would not be acceptable.

Policy EP2 Biodiversity (NPF Policy 3)

The applicant has provided a biodiversity action plan which when read with the landscape plan explains what steps have been take to promote and enhance biodiversity.

The plan states that a variety of trees, shrubs, wildflower plants, and hedging will be incorporated into the site to support a variety of animals and insects which is welcomed. Street trees will be provided throughout the development as well as a mix of species of hedging for boundary treatments. Blue infrastructure has also been included through the form of swales and SUDS.

The plan states that hedgehog highways will be incorporated in the design which is supported. However, a condition will be sought to ensure that a plan is provided showing where these will be located upon the site.

NPF4 – Policy 3 Biodiversity

Policy 3 seeks that all proposals must include appropriate measures to conserve, restore, and enhance biodiversity. This policy is in line with Policy EP2 and as stated above and in the QA the efforts have been made to support biodiversity through a variety of planting, and inclusion of green and blue infrastructure. The proposal was deemed to comply with EP2 and therefore it also is deemed to comply with Policy 3.

DP2 Housing

The Housing Strategy Development Manager has raised no objections to the development. The proposed housing mix meets the policy requirements for

affordable and accessible housing and previous concerns relating to the parking layout have been addressed.

NPF4 Policy 16 Quality Homes

Policy 16 seeks to provide delivery of high quality affordable homes. This development will provide 47 affordable homes. As the Housing Strategy Development Manager has raised no objection with the proposed housing mix the proposal is deemed to comply with Policy 16.

SP & D Conclusions

The proposal has been considered against policies PP1, EP2, EP5, DP1 i) a), DP2 and the Elgin South Masterplan and is deemed to comply with those policies for the reasons set out above and within the QA which accompanies this response.

As explained a significant amount of work was undertaken throughout the determination of this application by Officers and the applicant to ensure it complies with all MLDP policies which is reflected in it scoring "green" in all categories in the accompanying QA. The proposal is therefore deemed to comply with all relevant MLDP and NPF4 policies and there were no areas of conflict.

Other consultees will comment on compliance with other relevant MLDP and NPF4 policies.

Planning and Development Obligations - Developer Obligation payment of £ £1,707,751.08 is required in relation to education, healthcare and transportation infrastructure.

Building Standards Manager - A Building Warrant will be required.

Moray Flood Risk Management - No objection, following submission of additional information/clarification.

Moray Access Manager - No objection.

Nature Scot - No objections and they endorse the mitigation and enhancements proposed in section 4 of the Habitat Survey and Biodiversity Action Plan.

Scottish Environment Protection Agency – No statutory requirement to consultation SEPA as on site surface water drainage dealt as a part of drainage assessment. Bund along southern edge site was queried, but this has been in situ for many years and lies upon the uphill site of a field drain. It will mostly be covered by structural planting.

Aberdeenshire Council Archaeology Service – Approve subject to a condition regarding the need for a written scheme of investigation assess the archaeology of the site.

Health and Safety Executive – no objections, note that the development is within proximity to a High pressure gas main, and that consultation has been carried out with Scottish Gas Networks.

7. **OBJECTIONS-REPRESENTATIONS**

NOTE: Following the determination of this application, name and address details will be/have been removed (i.e. redacted) in accordance with the General Data Protection Regulations (paragraph 3 of Minute, Planning & Regulatory Services Committee 16 September 2014).

Mr & Mrs Laing – O

Issue: Objector assured by application that nothing would be built behind their property (they live at the southern end of Crescent North). They also wish to know the likely time when the development would occur.
Comments (PO): The plan supplied appears to show their property lies within the neighbouring consented and built Elgin South phase to the north of the current application site. Moray Council cannot comment on what assurances were or were not given to the objector that no development would occur behind them. At the time they bought the property, the LONG 2 housing designation within MLDP2020 did indicate that housing would be developed to the south at some stage. It is considered that there is sufficient distance between the rear of their property and proposed development.

Moray Council cannot confirm of stipulate when (if permission were granted) when the development may occur.

8. **OBSERVATIONS**

8.1 Section 25 of the 1997 Act as amended requires applications to be determined in accordance with the development plan, namely the adopted National Planning Framework 4 and adopted Moray Local Development Plan 2020 (MLDP) unless material considerations indicate otherwise.

8.2 **Background and NPF4**
This application is informed by the Updated Egin South Masterplan, adopted by Moray Council in August 2021, which supersedes some of the previous phasing contained within the planning approvals for Elgin South listed below. In general terms, notwithstanding the construction of Moray Sports Centre, Linkwood Primary School and some new housing near Linkwood Road, the majority of development in Elgin South has occurred in the south west of Elgin, with the majority of new housing occurring west of the A941 Rothes Road.

8.2.1 In February this year NPF4 replaced Scottish Planning Policy 2014 and provided national planning policies applicable to all 32 local planning authorities in Scotland. This becomes the ‘Development Plan’ alongside the local development plan (MLDP) and the relevant policies of both are used as the primary consideration in determining planning application. Where any difference or conflict exists between local and national planning policies,

national planning policies take precedence. Of note, application of some of the new national policies is however subdued until supplementary planning guidance is prepared to ensure consistent and clear application of the policies. While policies such as Policy 2 Climate mitigation and adaptation seeks to permit only development that minimises emissions and adapts to the current and future impacts of climate change, housing development is likely best influenced by future changes to Building Regulations, this development does what it can by the use of air source heat pumps, and other design measures seeking to minimise energy loss such as good cycle/pedestrian links to discourage motorised transport etc. Further detailed local guidance is being prepared to assist with calculating energy assessments for future developments.

8.3 **Principle of development for housing.**

8.3.1 **Placemaking, Siting and Design (NPF4 Policy 14, 15, 16 and PP1, DP1, DP2)**

8.3.2 NPF4 Policy 14 Design, quality and space seeks to encourage, promote and facilitate well designed development. It identifies 6 qualities Healthy, Pleasant, Connected, Distinctive, Sustainable and adaptable.

8.3.3 The proposal accords with requirement so of the Elgin South Masterplan, which has identified a school site at Glassgreen (adjacent to this site), green corridors, civic spaces, play areas, road and path connections, a mix of housing and retail units all in accordance with the high level indicative plan within the masterplan. The Housing Land Audit (HLA) 2021 allowed the release of the LONG2 housing designation which informed the update Elgin South Masterplan. The proposal therefore accords with the housing designation in which is located.

8.3.4 MLDP 2020 Policy PP1 Placemaking requires development proposals to meet the following criteria:

a) to be designed to create successful, healthy places that support good physical and mental health, safeguard the environment and support economic growth;
b) be supported by a Placemaking Statement (and sufficient information) for 10 or more units which demonstrates how the development proposal addresses PP1 requirements and other relevant LDP policies and guidance; and
c) to comply with Scottish Government Policy Creating Places and Designing Streets and incorporate seven fundamental principles addressing:

    i) Character and Identity,
    ii) Healthier, Safer Environments,
    iii) Housing Mix,
    iv) Open Spaces/Landscaping,
    v) Biodiversity,
    vi) Parking and
    vii) Street Layout and Detail.

8.3.5 There are a wide range of requirements specified in policies PP1 Placemaking, PP3 Infrastructure and Services, DP1 Development Principles and DP2 Housing that go beyond the requirements of the previous local development plan. These range from servicing/utilities plans (inclusive of future provision for electric car charging), biodiversity plans, public art, additional visitor carparking, open space requirements, street naming, place-making statement, restrictions on street frontage parking, bin and secure cycle storage.

8.3.6 The place-making statement addresses pedestrian movement, vehicular movement, public transport, safer environments, car parking, legibility/street hierarchy, character and identity, reference to surrounding buildings/materials housing mix, access to facilities/amenities, visual connection, natural features, open space and connections to open space, biodiversity and landscaping.

8.3.7 Following process of audit, discussion and amendment of the plans with the applicant, the following summary shows the quality audit change. Policy PP1 Placemaking sets out that sufficient information must be provided to allow the Council to carry out a Quality Audit (QA) of the proposal. As noted in the Strategic Planning and Development Team's response this Audit process has been undertaken and the application has been subject of a number of meetings and correspondence. Initial issues were identified and during consideration of the proposals revisions made to address the changes sought. The QA assessed the proposal under a number of heading as identified in the table below. While the QA process was conducted largely prior to adoption of NPF4, Moray Councils Quality Audit process was already closely aligned to its aims in terms of urban design, biodiversity and aims. A column of comparable goals within NPF4 policy 14 Liveable Places is included for reference.

Design Principle	Initial Score	Final Score	Mitigation/Condition Necessary to Score Green	NPF4 Liveable Places
Character & Identity			**Compliant with policy requirements. Distinct character areas, street planting and appropriate frontages onto school site now proposed**	**Pleasant/Distinctive**
Healthier, Safer, Environments			**Further detail given on the retail units close to the civic space or neighbourhood hub. Public in the form of bespoke public benches and hard and soft landscaping within the civic space provides a distinct and healthy environment.**	**Healthy**
Housing Mix	N/A	N/A	**Site accommodates 25% affordable homes and 10% accessible within the remaining private**	**Suitable/Adaptive**

			mix. Applicants now volunteering additional accessible units in private housing (23 in total). **Affordable is good central location, facing onto several streets alongside private housing.**	
Open Space/Landscaping			**Substantive amount of green spaces and a civic space proposed. Green streets now more evident in landscaping and parking plans. Condition requiring details for maintenance arrangements.**	**Pleasant/Healthy/and Sustainable**
Biodiversity			**Condition ensuring that hedgehog highways are provided, alongside species friendly mixes of grass, meadow and tree planting to enhance biodiversity. Almost 3000 trees being introduced to the site.**	**Sustainable**
Car Parking			**Compliant with policy requirements. Notable amount of trees proposed within parking areas to break up its appearance.**	**Pleasant/Suitable**
Street Structure, Layout and Detail			**Changes made to some junctions and cycle paths, now acceptable. Site is permeable and well connected.**	**Connected/Sustainable**

8.3.8 Of note from the Quality Audit process, the requirements for greener streets has resulted in a good level of street trees proposed planting and parking areas. The applicant has kept many of the street trees within communal areas, outwith private gardens where their presence can be more easily safeguarded and the can be taken within the maintenance regime of the wider landscaping.

8.3.9 NPF Policy 15 Local Living and 20 minute neighbourhoods, seeks to ensure people have access to facilities from their homes, including healthcare facilities. To this end residential developments must demonstrate or provide adequate services are easily accessible via non-motorised means, within 20 minutes of their home. Infrastructure such as schools and local shops, health care should

be locally accessible where possible. As part of the Updated Elgin South Masterplan, this phase of the Elgin South was to include an element of retail/commerce units ensuring units were provided that could accommodate local services/services. 3 small units are proposed near the square, and the applicant has confirmed their intent to provide a larger unit in the next Phase of Elgin South, appropriate for a neighbourhood grocery convenience store. This is in line with the retail assessment supporting the masterplan. It is noted that the Planning Statement makes reference on p16 to a further small 87sqm unit being provided within Phase 3, but subsequent to this, discussion around the retail requirements for the wider Elgin South west village centre see the applicant acknowledging the requirement for a larger convenience store, which would be subject of a separate application.

8.3.10 The various proposed parking courts are generally to the rear or side of the areas hosting apartments. The rear parking area, north of the proposed civic square is bound on its north side by rear higher garden fences, but looking at the orientation of the AA type flats, and 3 storey flats lying to its west and south, there are many primary windows, such as kitchen, bedroom and dining areas overlooking the parking, such that it will be overlooked. The presence of cycle and bin storage areas, in additional to the parking means that the degree of passive surveillance etc. will be sufficient to ensure it feels like a safe space.

8.3.11 The developer has also managed to ensure that within each of the defined streets, at least 50% parking lies behind the building line, and the reduction in prominence of street parking is also aided by the number street trees proposed.

8.3.12 As part of the place making requirements, the applicant has proposed public art in the form of bespoke benches, which are to be commissioned and will be evident within the civic space and likely elsewhere in the site. A condition is recommended to ensure these instillations add some unique to the identity and amenity of the areas they are installed within. The proposed civic space, or square in the middle of the development sees a good quality space, close to the shops, host to the play area, which includes distinctive hard and soft landscaping, planting and street trees.

8.4 <u>Design</u>

8.4.1 Beyond a diverse range of building materials, paving block and planting diversity between the various character areas, the proposals show 17 different styles of house, and 8 different style of flatted apartments. The added diversity provided in the materials used for key buildings all contribute to what will be a distinct and unique development, which will also see notably more diversity to building finishes that is seen elsewhere in Elgin South. Individually the style of each house type, apartment or semi-detached units is also acceptable, with well-proportioned elevations and sufficient distances to neighbouring plots.

8.4.2 The development layout and design therefore complies with the requirements of NPF4 policy 14 Liveable Places and MLDP Policy PP1 Placemaking and above associated polices.

8.5 **Access and Parking (NPF4 Policy 13, 18 and PP3, DP1)**

8.5.1 NPF4 Policy 13 Sustainable Transport has similar requirements and seeks to encourage, promote and facilitate development that prioritises sustainable travel. Policy 18 Infrastructure first to encourage, promote and facilitate an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of place-making.

8.5.2 Policies PP3 Infrastructure and Services and DP1 Development Principles require the provision of a safe entry/exit from new development, with appropriate infrastructure, parking, cycle parking and Electric Vehicle (EV) charging facilities.

8.6 Pedestrian and Cycle Access

Provision is made within the development for cycle routes which provide strong connectivity both north-south with the existing network and east-west passing through the central 'square' feature where the proposed retail units are located. There is a comprehensive network of footways within the site however the proposals lack clarity or consideration of the masterplan proposals in terms of the extension of the existing cycle path east-west from Crescent North at the boundary of the site which is a key route and would provide more direct pedestrian routes for pedestrians and cyclists. A condition is recommended to address the lack of details and the provision of this west-east active travel route which would reduce travel distances for pedestrians and cyclists.

8.6.1 Due to the nature of the A941 in the vicinity of the site access, the lack of close frontage development and no other interventions at the location of the proposed site access junction. It is considered that no reduction to the existing national speed limit would be appropriate as it would not be self-enforcing. It is therefore not recommended to provide at grade pedestrian crossing facilities. In order to facilitate pedestrian and cycle connectivity in the future a grade separated crossing of the road must be considered. An over bridge has been identified as the preferred solution as noted in the Elgin South Masterplan Phase 1 TA. The submission included an indicative bridge design in order to demonstrate the feasibility to incorporate this and the Elgin South Masterplan TA Phase 1 states that it is expected that this will be delivered after 2030. Transportation note that the provision of this would not be triggered by the current application, any trigger will be subject to consideration of any future applications and the details for the indicative bridge are not approved as part of the current application.

8.7 Public Transport

8.7.1 The TA submitted notes the nearest existing bus services to the north on Thornhill Drive (33 A/C and 36) these stops are in excess of a kilometre from the site and are therefore in excess of the recommended maximum 5 minute walk time (400m) to achieve an acceptable level of accessibility. In order to provide bus services within a 5 minute walk of the proposed development, alterations to existing or the provision of new bus services will be required. The roads within the development would provide a 6.1m wide road link between the A941 to the east and the C2E (Birnie Road) to the west to facilitate the future provision of bus services. Provision is made for east and westbound bus stops within the development adjacent to the proposed future school site. The Transport Assessment (TA) submitted in support of the application notes that *"Springfield will liaise with TMC public transport officers and local bus operators*

to discuss extending and re-routing existing services and delivering new services in order to serve Elgin South. This will be informed by the phasing and completion/ occupation of individual Character Areas." A condition is recommended to ensure the roads and bus stop infrastructure are completed and bus services are provided at an appropriate stage in the development. Whilst this does not guarantee a bus service for the future it is aimed at supporting the introduction of public transport, with the intention to hopefully achieve a commercially viable service in the future.

8.7.2 *Vehicular Access*

Access to this development will be taken via a new priority controlled T junction onto Birnie Road (C2E) to the west. It is noted within the Transport Assessment (TA) that access is also to be provided via a priority junction onto the A941 however subsequent to this submission, the proposals were revised to include a ghost island junction to satisfy the design requirements. The TA notes that a 4 arm roundabout would be required for future phases of the Elgin South development. TA states that *the construction and delivery of the future A941 roundabout will be dictated by an agreed 'threshold' in terms of the number of residential units that can be constructed/occupied before the roundabout is required*. It should be noted that no threshold has been agreed with MC Transportation. Transportation would support the provision of a roundabout as part of the current application however acknowledge that it is not necessary at this time. In order to demonstrate the feasibility of the future access requirements a preliminary design for a roundabout has been submitted which is acceptable in principle and the trigger for any future roundabout is likely to be associated with any future development to the east of the A941. The indicative details for the roundabout are acceptable in principle however they are not approved as part of the current application.

8.7.3 <u>Speed Limits</u>

The TA recommends that consideration is given to extending the existing 40mph speed limit on the A941 southwards to include the proposed new junction. Transportation have advised the applicants that this would not be supported due to the set-back development frontage and lack of any speed intervention measures to support a self-enforcing 40mph speed limit at this location. Based on the submitted details to date, the current 60mph speed limit would remain and has been used in consideration of the current design proposals to form the new junction.

8.7.4 The design of the Birnie Road site access junction and visibility splays are based on an assumption that the existing 40mph speed limit would be extended southwards to the southern side of the proposed site access junction. A condition is recommended to trigger the requirements for the commencement and completion of the statutory process, and the completion of the works required to achieve this.

8.7.5 Regarding Birnie Road C2E, a change to the layout was required to ensure the new junction onto Birnie Road could be achieved safely, and further detailed work design work will be carried out post consent. The amended junction position is however now acceptable and takes the junction to a location were appropriate visibility can be achieved.

8.7.6 Consultation with Transport Scotland has confirmed that subject to a condition about the need for a bypass in future phases, the current application acceptable, subject to the roads works proposed.

8.7.7 Each block of flats has dedicated secure cycle parking, allowing to for 2 bicycles per flat to be stored.

8.7.8 Subject to the conditions recommended the proposals accord with the relevant infrastructure policies above.

8.8 **Drainage, Water Supply and Flood risk (NPF4 Policy and PP3, DP1, EP12)**
Policies PP3 Instructure and Services and DP1 Development Principles (iii) Water Environment, Pollution, Contamination require development to be planned and co-ordinated with infrastructure to ensure places function properly, and proposals are adequately served by infrastructure and services in terms of foul and surface water drainage and water supply. Policy EP12 Management and Enhancement of the Water Environment requires surface water from development to be dealt with in a sustainable manner (SuDS) that has a neutral effect on the risk of flooding or which reduces the risk of flooding, including temporary/construction phase SuDS.

8.8.1 NPF4 22 Flood Risk & Water Management seeks to strengthen resilience of development to flood risk through avoidance as a first principle, reducing the vulnerability of existing/future development to flooding, and advocates use of SUDs to ensure surface water does not increase flood risk to itself and others.

8.8.2 The application site, which was subject only to surface water drainage issues was accompanied by a detailed Drainage Impact Assessment and drainage scheme, which see a range of green and blue drainage solutions proposed. Beyond the 3 SUDS basins, the proposal includes several swales in the green verges that run throughout the development. The drainage arrangements are acceptable to the Moray Flood Risk Management Team, and the proposal therefore complies with policies NPF4, DP1, EP12 and PP1.

8.9 **Natural Environment (NPF Policy 1, 3 and 4 and EP1, PP1, DP1)**
NPF4 Policy 1 Tackling the climate and nature crisis and Policy 2 Climate mitigation and adaptation support development which addresses the global climate emergency and nature crisis, and minimises greenhouse gas emissions. NPF4 Policy 3 Biodiversity seeks to protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks. NPF4 Policy 4 Natural Places has similar requirements to MLDP policy EP1 in terms of protecting designation integrity/interests and species.

8.9.1 The site is not subject to any international, national or local environmental designations and has already been subject to some intervention from the adjoining construction works. The site is currently open agricultural grazing land of limited ecological value, but the proposal includes substantive areas of structural planting that will see almost 3000 trees planted across the site, and also substantive amounts of trees proposed within street, parking areas and civic areas. The Habitat Survey carried out didn’t identify any sensitive species on site requiring specific protection or mitigation.

8.9.2 The applicant has proposed within Habitat Survey and Biodiversity Action Plan mitigation, such as provision of hedgehog highways and grass cutting regimes that operate on rota to maintain differing lengths of grass and allow meadow or grass mixes to flower and seed.

8.9.3 Landscaping biodiversity – it is noted the application propose enhancements within the Habitat Survey and Biodiversity Action Plan, such as, but not limited to the use of a bee, bird and butterfly seed grass/meadow mixes on street verges, wet meadow seed mix in SUDS areas. Newly planted trees, shrubs and hedgerows will include native nut, seed, berry and nectar producing species to provide a foraging resource for wildlife in the locale, such species include: Scot's pine, rowan, gean, hazel, hawthorn, blackberry, dog rose and holly. These will ensure a diversity of plant habitat, and the large structural planting areas, host to several thousand trees will be provide a different habitat to the street trees, and grassed areas. The applicant has confirmed that beyond the 192 street trees being planted (most of which are heavy standards) the areas of structural planting will cover 19,500sqm and host approximately 2623 new trees.

8.9.4 NPF4 Policy 2 Biodiversity contains similar goals to those present in EP1, PP1, DP1 and the proposed planting will ensure the development enhances the environment of the current site. The construction mitigation and best practices to reduce the impact on the natural environment are the subject of conditions, inclusive of the need for Construction Environmental Management Plan.

8.10 **Affordable housing (NPF Policy16 and DP2 (d))**
NPF4 policy Quality Homes seeks to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities. Policy DP2 Housing requires new housing developments to provide 25% of the total units as affordable housing in affordable tenures to be agreed by the Housing Strategy and Development Manager.

8.10.1 As this development has provided the necessary proportion of affordable houses (47 Units) of a mix previously discussed with the Housing Service the proposal comply with the above policies. Conditions are recommended to ensure delivery of the affordable housing.

8.11 **Accessible Housing (NPF Policy15, 16 and DP2)**
NPF4 Policy 15 Local Living and 20 Minute Neighbourhoods makes reference to the need for provision of accessible housing options, giving the ability to age in place and utilise housing diversity.

8.11.1 In terms of accessible housing, 23 accessible housing units are to be provided across the private housing, this provides more than the necessary 14 accessible units that would make 10% of the requirement under Policy DP2. These properties are shown and detailed in the submitted Accessible Housing Statement which identifies the specific house designs to meet accessible housing standards. Of note further accessible houses will comprise some the

affordable housing also. A condition is recommended ensuring the accessible housing meets the standard set out in MLDP.

8.11.2 The proposal is now deemed to fully comply with PP1, DP2 f) and Policy 15 where the 10% requirements of accessible housing from the private stock proposed is required.

8.12 **Pollution Control (NPF Policy 12 and DP1, EP14 and R1)**

8.12.1 NPF policy 12 Zero Waste seeks to minimise waste and pollution.

8.12.2 Policies DP1 Development Principles and Policy EP14 Pollution, Contamination and Hazards seek to ensure that new developments do not create pollution which may adversely affect the environment or local amenity.

8.12.3 Conditions recommended seek a Construction Environmental Management Plan for the construction process, but it is not anticipated that the development would generate pollution post consent. The applicant has provided good bin storage facilities for all the apartments, which will encourage recycling. A condition is recommended requiring a site specific waste management plan to be submitted to ensure compliance with NPF policy 12.

8.13 **Impact on Cultural Heritage (NPF policy 7 and EP8, EP10)**
Policy EP8 Historic Environment seeks the preservation of sites of local archaeological importance, and the integrity of their settings and Policy EP10, the protection of listed buildings and their settings.

8.13.1 NPF policy 7 Historic Assets and Places seeks to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.

8.13.2 Given the site size and location an archaeological investigation has been sought. Whilst there a no known archaeological assets on the site, there are many in the wider area. The applicants have already prepared a Written Scheme of Investigation (WSI) for archaeology, but a condition is recommended allowing for the submission of an updated investigation that allows the Archaeology Service to review the proposals.

8.13.3. The proposal, subject to the archaeological condition, therefore complies with both policy EP8 and EP10.

8.14 **Developer Obligations (NPF4 Policy 18 and PP3)**

8.14.1 NPF4 Policy 18- Infrastructure first intends to encourage, promote and facilitate an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of place making. This can be achieved via various means including planning obligations.

8.14.2 The development has been the subject of a developer obligations assessment in accordance with policy PP3 Infrastructure and Services and supplementary planning guidance which has identified the need for contributions towards healthcare facilities. The applicants have agreed to the level of developer

obligations which will require to be secured via a S.75 legal agreement prior to the issue of the planning consent. These obligations will address identified needs in education, health care and transportation matters.

Conclusion
Subject to the conditions recommended the development would be acceptable with housing layout, house designs and tree planting are all compliant with policy. The creation of a neighbourhood hub, or civic space, which will the focal point for the current application and intended to serve also Phase 3, will provide a good focal point for the community and will form a distinct and attractive feature within the community.

REASON(S) FOR DECISION
The Council's reason(s) for making this decision are: -

The proposal accords with the relevant policies of National Planning Framework 4 and Moray Local Development Plan 2020, and there were no material considerations that would indicate otherwise.

Author/Contact Officer:	Neal MacPherson Principal Planning Officer	**Ext:**	01343 563266

Beverly Smith
Development Management & Building Standards Manager

REPORT TO: **PLANNING AND REGULATORY SERVICES COMMITTEE ON 14 MARCH 2023**

SUBJECT: **22/01652/PAN ERECTION AND OPERATION OF ANAEROBIC DIGESTION PLANT AND ASSOCIATED INFRASTRUCTURE ON LAND AT LONGMORN ELGIN**

BY: **DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND FINANCE)**

1. REASON FOR REPORT

1.1 To inform the Committee that a Proposal of Application Notice (PAN) was submitted on 8 November 2022 on behalf of Acorn Bioenergy

1.2 This report is submitted to Committee in terms of Section III (E) (1) of the Council's Scheme of Administration relating to exercising the statutory functions of the Council as a Planning Authority.

2. RECOMMENDATION

2.1 It is recommended that:

(i) in noting the terms of this report, the Committee advise upon any provisional views/relevant issues that Members of this Committee (or any other Member(s) of the Council) wish to raise about the proposed development so that these matters can be recorded and thereafter fed back to the prospective applicant in order to inform the development of their proposed formal application for planning permission; and

(ii) the matters raised by the Committee also be forwarded to consultees likely to be involved in any formal application for planning permission for the proposal.

3. BACKGROUND

3.1 Scottish Government has published guidance which encourages elected members to highlight any issues with a proposed development at the pre-

application stage which they would wish to see taken into account within any formal application for planning permission.

3.2 Following consideration by this Committee on 11 November 2014 it was agreed that any PAN received after this date would be reported to Committee to give Members of the Committee, and the Council, the opportunity to identify any key issues/provisional views about the proposed development and that these matters be reported back to applicant (paragraph 4 of the Minute refers).

3.3 This current report is not about the merits of the proposed development but rather, based on local knowledge of local issues and wider concerns, etc. Members are invited to identify any matters relevant to the proposal. These will be reported back to the prospective applicant for their information and attention, and to inform the development of the proposed application. It is also proposed that, for information, Members' comments be forwarded to consultees likely to be involved in any formal application for planning permission for the proposal.

3.4 This PAN relates to a proposal for an anaerobic digester plant and associated infrastructure which will convert waste feed stock into biogas which is upgraded to biomethane which will ultimately be fed into the national grid. The proposed development includes digestion tanks, gas flare, biogas upgrading and CO2 recovery unit, feed hopper, heat exchanger, chiller, CP2 tanks, digestate lagoons and rainwater lagoon. The generating capacity will be 100GW per year. The development will not be connected to the grid and the biomethane will be transported to an off-site hub where it will enter the grid.

3.5 The site extends to 10.2ha and is located on open farm land at Longmorn. The A941 runs to the east of the site. Ben Riach Distillery and the rural grouping of Longmorn (as identified in the MLDP 2020) are to the south and east. The site is within the Countryside Around Town (CAT) around Elgin. The Longmorn Burn runs to the east of the site and Foths Burn runs to the west. Parts of the site close to the water courses are identified by SEPA as being at risk of fluvial flooding. Parts of the site are also identified as being at risk of surface water flooding.

3.6 Planning permission is required for this proposal. The proposal is for an industrial process where the site exceeds 2ha and therefore the proposal is a major development for planning purposes. The proposal will be subject to PAN and pre-application consultation procedures with the local community. The applicant(s) have been advised of the Council's pre-application advice service to assist in identifying key issues and information that would be expected to accompany any formal application.

3.7 A formal response has been issued to the applicant's agent to confirm that the proposed arrangements for engaging with the local community are sufficient. The applicant proposes to consult with Heldon, Innes and Speyside Community Councils. In this case the applicant's agent has been advised that no additional parties require to be notified with a copy of the PAN.

3.8 The regulations in relation PAC have changed (The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021) refers) to require a minimum of two public events for all PANs submitted after 1 October 2022. The final event is primarily about feedback on the views gathered during PAC. In this case, the PAN advises that public events will be held at Fogwatt Hall on Wednesday 7 December and Wednesday 18 January. Each event requires to be advertised locally in advance and allow an opportunity for feedback upon the proposal. For validation purposes for a major application, the applicant is required to submit a pre-application consultation report setting out the steps taken to consult with the local community together with details of comments made on the proposal and how the applicant has responded to all comments made on the proposal in the development of the application.

4. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))
Identifying key issues at an early stage to assist with front loading major planning applications is a vital aspect of supporting and facilitating the Council's priority for economic development in Moray.

(b) Policy and Legal
Scottish Government guidance on the role of councillors in pre-application procedures affords elected members the opportunity to offer general provisional views on forthcoming developments which are the subject of a PAN where the details of the development have yet to be finalised.

(c) Financial implications
None

(d) Risk Implications
None.

(e) Staffing Implications
None.

(f) Property
None.

(g) Equalities/Socio Economic Impact
None.

(h) Climate Change and Biodiversity Impacts
None

(i) Consultations
Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Development Management and Building Standards Manager, the Equal

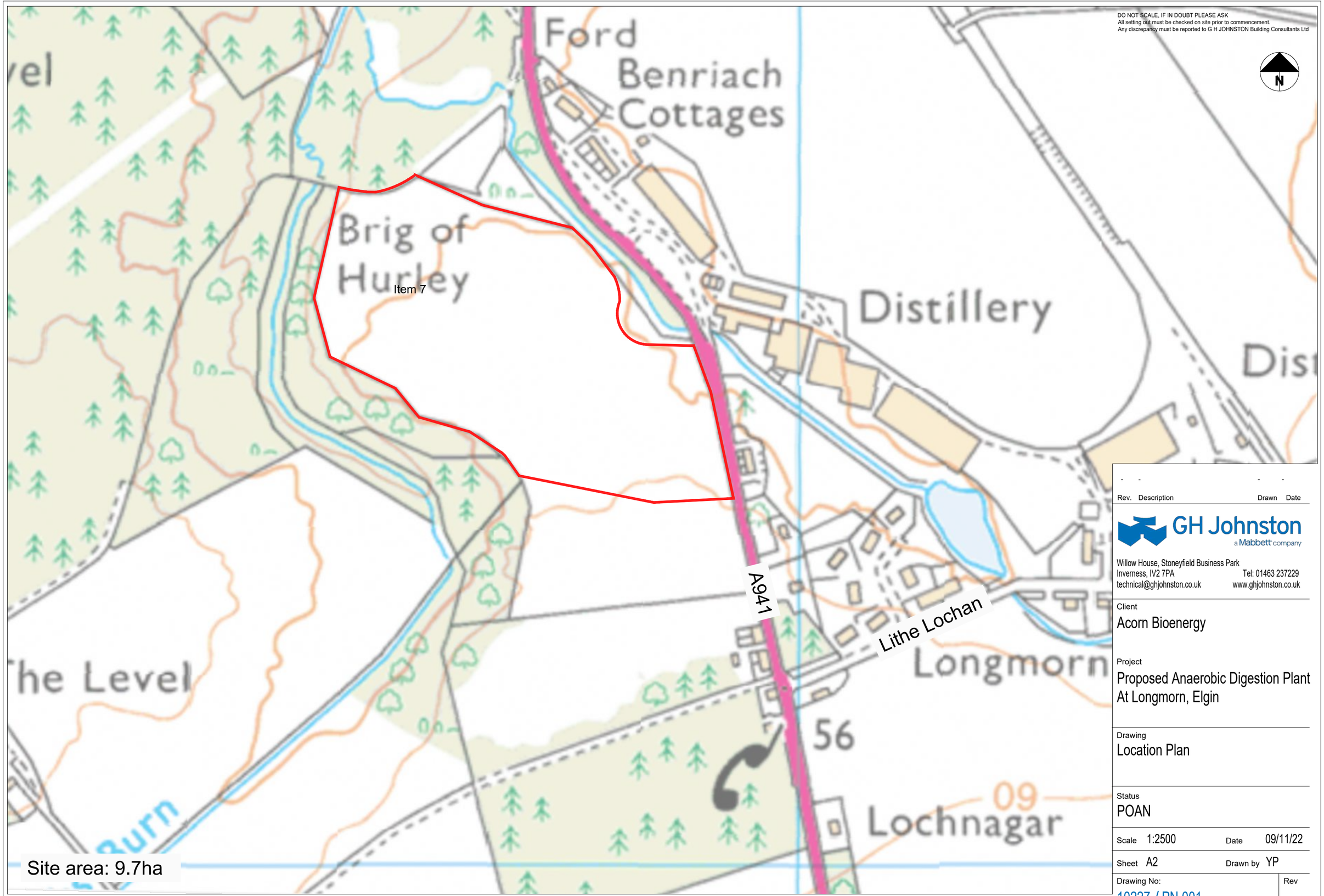
Opportunities Officer, the Strategic Planning & Delivery Manager, and Lissa Rowan (Committee Services Officer) have been consulted, and comments received have been incorporated into the report.

Members of Moray Council who are not on this Committee have also been consulted and any views received on the proposal will be made known at the meeting

5. CONCLUSION

5.1 The Council has received a PAN intimating that a formal application for planning permission will be submitted for a major development proposal, in this case for permission for an anaerobic digester. The Committee (and any other Member(s) of the Council) are asked to identify any provisional views/relevant issues which they would wish to see taken into account and inform the development of the proposal.

Author of Report: Lisa MacDonald
Background Papers: 22/01652/PAN
Ref:



Location Plan 1:2500

Rev.	Description	Drawn	Date
-	-	-	-

GH Johnston
a Mabbett company
Willow House, Stoneyfield Business Park
Inverness, IV2 7PA
Tel: 01463 237229
technical@ghjohnston.co.uk
www.ghjohnston.co.uk

Client
Acorn Bioenergy

Project
Proposed Anaerobic Digestion Plant
At Longmorn, Elgin

Drawing
Location Plan

Status
POAN

Scale 1:2500 Date 09/11/22

Sheet A2 Drawn by YP

Drawing No: 10227 / PN 001 Rev

REPORT TO: **PLANNING AND REGULATORY SERVICES COMMITTEE ON 14 MARCH 2023**

SUBJECT: **22/01653/PAN ERECTION AND OPERATION OF ANAEROBIC DIGESTION PLANT AND ASSOCIATED INFRASTRUCTURE ON LAND AT RATHVEN, BUCKIE**

BY: **DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND FINANCE)**

1. REASON FOR REPORT

1.1 To inform the Committee that a Proposal of Application Notice (PAN) was submitted on 8 November 2022 on behalf of Acorn Bioenergy

1.2 This report is submitted to Committee in terms of Section III (E) (1) of the Council's Scheme of Administration relating to exercising the statutory functions of the Council as a Planning Authority.

2. RECOMMENDATION

2.1 It is recommended that:

(i) in noting the terms of this report, the Committee advise upon any provisional views/relevant issues that Members of this Committee (or any other Member(s) of the Council) wish to raise about the proposed development so that these matters can be recorded and thereafter fed back to the prospective applicant in order to inform the development of their proposed formal application for planning permission; and

(ii) the matters raised by the Committee also be forwarded to consultees likely to be involved in any formal application for planning permission for the proposal.

3. BACKGROUND

3.1 Scottish Government has published guidance which encourages elected members to highlight any issues with a proposed development at the pre-

application stage which they would wish to see taken into account within any formal application for planning permission.

3.2 Following consideration by this Committee on 11 November 2014 it was agreed that any PAN received after this date would be reported to Committee to give Members of the Committee, and the Council, the opportunity to identify any key issues/provisional views about the proposed development and that these matters be reported back to applicant (paragraph 4 of the Minute refers).

3.3 This current report is not about the merits of the proposed development but rather, based on local knowledge of local issues and wider concerns, etc. Members are invited to identify any matters relevant to the proposal. These will be reported back to the prospective applicant for their information and attention, and to inform the development of the proposed application. It is also proposed that, for information, Members' comments be forwarded to consultees likely to be involved in any formal application for planning permission for the proposal.

3.4 This PAN relates to a proposal for an anaerobic digester plant and associated infrastructure which will convert waste feed stock into biogas which is upgraded to biomethane which will ultimately be fed into the national grid. The proposed development includes digestion tanks, gas flare, biogas upgrading and CO2 recovery unit, feed hopper, heat exchanger, chiller, CP2 tanks, digestate lagoons and rainwater lagoon. The generating capacity will be 100GW per year. The development will not be connected to the grid and the biomethane will be transported to an off-site hub where it will enter the grid.

3.5 The site extends to 6.ha and is located on open farm land to the east of the junction of the A98 and March Road in Buckie. The A98 runs to the south of the site and March Road to the west. There is woodland to the south east. The Settlement boundary of Buckie is approximately 300 m to the north and the rural grouping of Rathven (both as identified in the MLDP 2020) is approximately 650m to the north. The nearest houses are approximately 270m to the west. The site is within the Countryside Around Town (CAT) around Buckie. The Tarrieclerach which is a visible cairn that is noted on the Historic Environment Record (HER) abuts the site to the south east. A small portion of the north western corner of the site is identified by SEPA as being at risk of surface water flooding.

3.6 Planning permission is required for this proposal. The proposal is for an industrial process where the site exceeds 2ha and therefore the proposal is a major development for planning purposes. The proposal will be subject to PAN and pre-application consultation procedures with the local community. The applicant(s) have been advised of the Council's pre-application advice service to assist in identifying key issues and information that would be expected to accompany any formal application.

3.7 A formal response has been issued to the applicant's agent to confirm that the proposed arrangements for engaging with the local community are sufficient. The applicant proposes to consult with Buckie & District and Findochty &

District Community Council. In this case the applicant's agent has been advised that no additional parties require to be notified with a copy of the PAN**.**

3.8 The regulations in relation PAC have changed (The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021) refers) to require a minimum of two public events for all PANs submitted after 1 October 2022. The final event is primarily about feedback on the views gathered during PAC. In this case, the PAN advises that public events will be held at The Fishermen's Hall in Buckie on Thursday 8 December and Thursday 19 January. Each event requires to be advertised locally in advance and allow an opportunity for feedback upon the proposal. For validation purposes for a major application, the applicant is required to submit a pre-application consultation report setting out the steps taken to consult with the local community together with details of comments made on the proposal and how the applicant has responded to all comments made on the proposal in the development of the application.

4. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))
Identifying key issues at an early stage to assist with front loading major planning applications is a vital aspect of supporting and facilitating the Council's priority for economic development in Moray.

(b) Policy and Legal
Scottish Government guidance on the role of councillors in pre-application procedures affords elected members the opportunity to offer general provisional views on forthcoming developments which are the subject of a PAN where the details of the development have yet to be finalised.

(c) Financial implications
None

(d) Risk Implications
None.

(e) Staffing Implications
None.

(f) Property
None.

(g) Equalities/Socio Economic Impact
None.

(h) Climate Change and Biodiversity Impacts
None

(i) Consultations

Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Development Management and Building Standards Manager, the Equal Opportunities Officer, the Strategic Planning & Delivery Manager, and Lissa Rowan (Committee Services Officer) have been consulted, and comments received have been incorporated into the report.

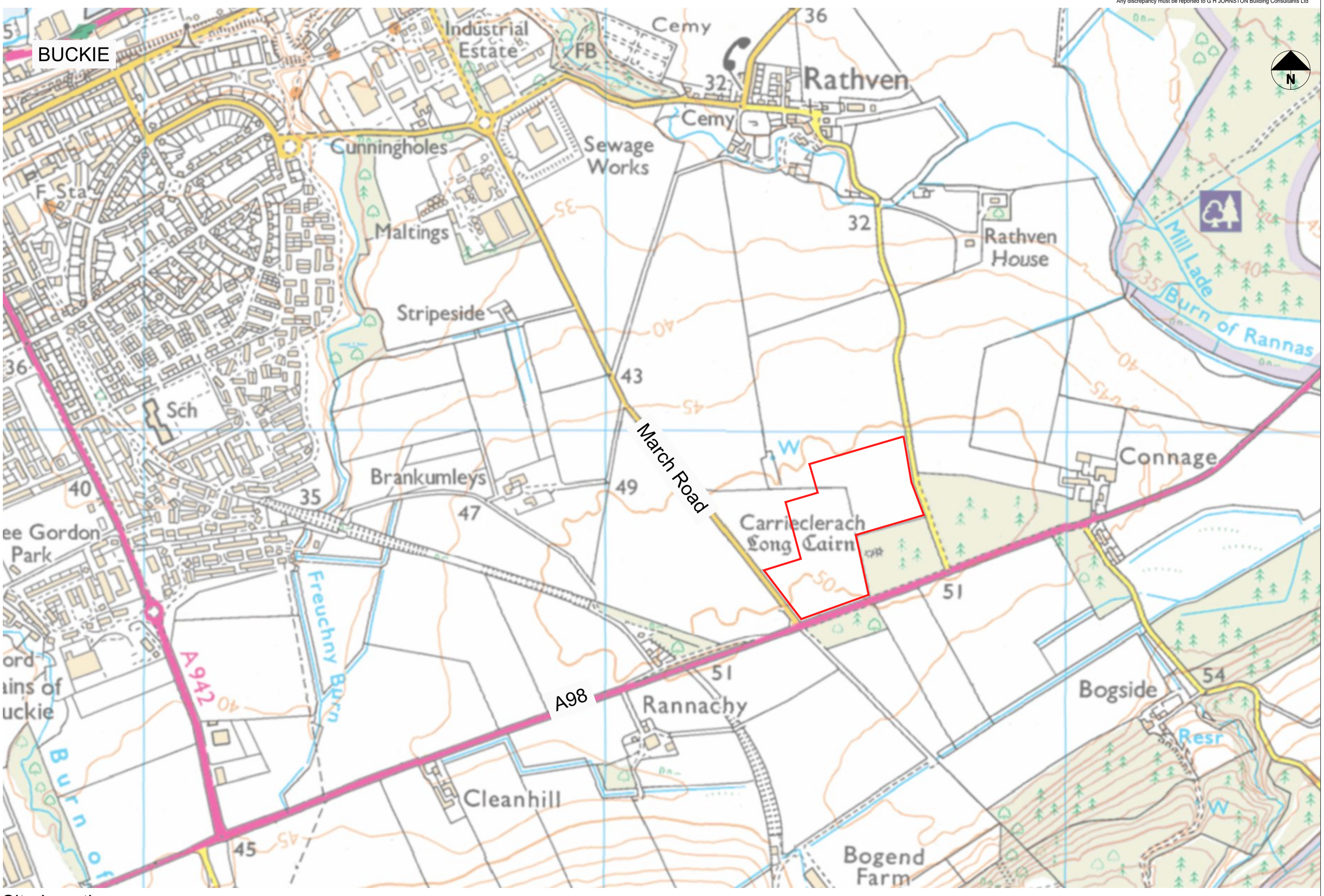
Members of Moray Council who are not on this Committee have also been consulted and any views received on the proposal will be made known at the meeting

5. CONCLUSION

5.1 The Council has received a PAN intimating that a formal application for planning permission will be submitted for a major development proposal, in this case for permission for an anaerobic digester. The Committee (and any other Member(s) of the Council) are asked to identify any provisional views/relevant issues which they would wish to see taken into account and inform the development of the proposal.

Author of Report: Lisa MacDonald
Background Papers: 22/01653/PAN
Ref:

DO NOT SCALE, IF IN DOUBT PLEASE ASK
All setting out must be checked on site prior to commencement.
Any discrepancy must be reported to G H JOHNSTON Building Consultants Ltd



Site Location 1:5000

Scale 1:5000 (metres)

Site area: 6.8ha

Location Plan 1:2500

Scale 1:2500 (metres)

Rev.	Description	Drawn	Date
-	-	-	-

GH Johnston
a Mabbett company
Willow House, Stoneyfield Business Park
Inverness, IV2 7PA
technical@ghjohnston.co.uk
Tel: 01463 237229
www.ghjohnston.co.uk

Client
Acorn Bioenergy

Project
Proposed Anaerobic Digestion Plant
On Land At Buckie

Drawing
Location Plan

Status
PRIOR NOTIFICATION

Scale 1:2500 Date 08/11/22
Sheet A1 Drawn by YP
Drawing No: 10229 / PN 001 Rev

REPORT TO: **PLANNING AND REGULATORY SERVICES COMMITTEE ON 14 MARCH 2023**

SUBJECT: **23/00206/PAN PROPOSED INSTALLATION OF AN ENERGY STORAGE FACILITY INCLUDING THE SITING OF BATTERY ENCLOSURES, POWER CONVERSION UNITS AND TRANSFORMERS, A SUBSTATION, HARD-STANDING AREA, FENCING, VEHICULAR ACCESS, GRID CONNECTION AND ANCILLARY WORKS ON LAND TO WEST OF BERRYBURN SUBSTATION, MORAY**

BY: **DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND FINANCE)**

1. REASON FOR REPORT

1.1 To inform the Committee that a Proposal of Application Notice (PAN) was submitted on 6 February 2023 by Renewable Energy Systems Limited.

1.2 This report is submitted to Committee in terms of Section III (E) (1) of the Council's Scheme of Administration relating to exercising the statutory functions of the Council as a Planning Authority.

2. RECOMMENDATION

2.1 It is recommended that:

(i) in noting the terms of this report, the Committee advise upon any provisional views/relevant issues that Members of this Committee (or any other Member(s) of the Council) wish to raise about the proposed development so that these matters can be recorded and thereafter fed back to the prospective applicant in order to inform the development of their proposed formal application for planning permission; and

(ii) the matters raised by the Committee also be forwarded to consultees likely to be involved in any formal application for planning permission for the proposal.

3. BACKGROUND

3.1 Scottish Government has published guidance which encourages elected members to highlight any issues with a proposed development at the pre-application stage which they would wish to see taken into account within any formal application for planning permission.

3.2 Following consideration by this Committee on 11 November 2014 it was agreed that any PAN received after this date would be reported to Committee to give Members of the Committee, and the Council, the opportunity to identify any key issues/provisional views about the proposed development and that these matters be reported back to applicant (paragraph 4 of the Minute refers).

3.3 This current report is not about the merits of the proposed development but rather, based on local knowledge of local issues and wider concerns, etc. Members are invited to identify any matters relevant to the proposal. These will be reported back to the prospective applicant for their information and attention, and to inform the development of the proposed application. It is also proposed that, for information, Members' comments be forwarded to consultees likely to be involved in any formal application for planning permission for the proposal.

3.4 This PAN relates to a proposal for an energy storage facility which will include battery enclosures, power conversion units and transformers, a substation, hard standing area, fencing, vehicular access, grid connection and ancillary works. The submission states that the development would have a capacity of up to 49.9MW. A plan is appended showing the location and extent of the site (**Appendix 1**).

3.5 The site extends to 4.4ha and is located directly adjacent to Berryburn Electrical Substation, approximately 3km southeast of Dunphail and approximately 11.5km south of Forres. It is irregular in shape and comprises an agricultural field and grassland. The northwest of the site is bordered by an overhead electricity line, beyond which lies grassland and woodland. The southeast of the site is bordered by a minor road which leads back to the A940 under the Divie Viaduct to the west. To the south lies grassland and agricultural land. Vehicular access is proposed via an existing estate track which joins onto the U89E unclassified road 3km to the north.

3.6 Planning permission is required for this proposal. The proposal is for an energy installation with a capacity of 49.9 MW therefore under the current hierarchy regulations the proposal would comprise a major development for planning purposes. The proposal will be subject to PAN and pre-application consultation (PAC) procedures with the local community. The applicant has used the Council's pre-application advice service to assist in identifying key issues and information that would be expected to accompany any formal application.

3.7 A formal response has been issued to the applicant's agent to confirm that the proposed arrangements for engaging with the local community are sufficient. The applicant proposes to consult with Finderne Community Council and councillors for the Forres ward, and to distribute project information letters to stakeholders and the local community. A dedicated website will also be launched and will be updated, and remain live throughout the project's development. In this case the applicant's agent has been advised that no additional parties require to be notified with a copy of the PAN**.**

3.8 The regulations in relation PAC have changed (The Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021) refers) to require a minimum of two public events for all PANs submitted after 1 October 2022. The final event is primarily about feedback on the views gathered during PAC. In this case the PAN advises that public events will be held at Edinkillie Community Hall, Dunphail on Thursday 23 February 2023 and during the week commencing 17 April 2023 (with date to be confirmed). Each event requires to be advertised locally in advance and allow an opportunity for feedback upon the proposal. For validation purposes for a major application, the applicant is required to submit a pre-application consultation report setting out the steps taken to consult with the local community together with details of comments made on the proposal and how the applicant has responded.

4. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))
Identifying key issues at an early stage to assist with front loading major planning applications is a vital aspect of supporting and facilitating the Council's priority for economic development in Moray.

(b) Policy and Legal
Scottish Government guidance on the role of councillors in pre-application procedures affords elected members the opportunity to offer general provisional views on forthcoming developments which are the subject of a PAN where the details of the development have yet to be finalised.

(c) Financial implications
None.

(d) Risk Implications
None.

(e) Staffing Implications
None.

(f) Property
None.

(g) Equalities/Socio Economic Impact
None.

(h) Climate Change and Biodiversity Impacts
None

(i) Consultations
Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Development Management and Building Standards Manager, the Equal Opportunities Officer, the Strategic Planning & Delivery Manager, and Lissa Rowan (Committee Services Officer) have been consulted, and comments received have been incorporated into the report.

Members of Moray Council who are not on this Committee have also been consulted and any views received on the proposal will be made known at the meeting

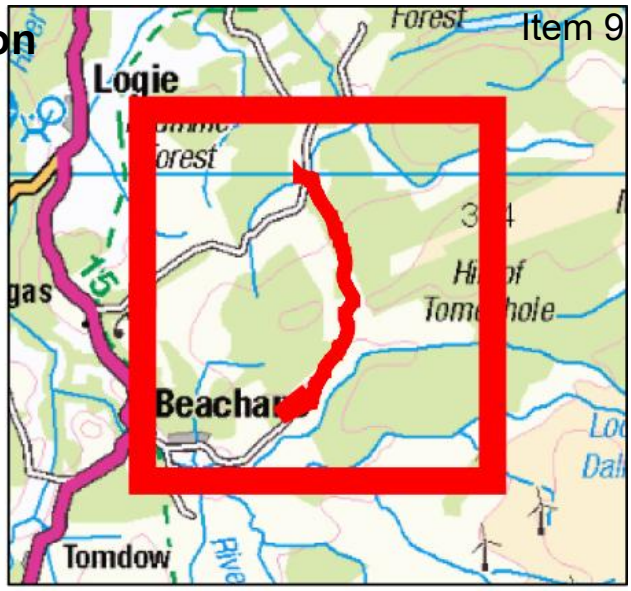
5. CONCLUSION

5.1 The Council has received a PAN intimating that a formal application for planning permission will be submitted for a major development proposal, in this case for permission for an energy storage facility. The Committee (and any other Member(s) of the Council) are asked to identify any provisional views/relevant issues which they would wish to see taken into account and inform the development of the proposal.

Author of Report: Richard Smith, Principal Planning Officer
Background Papers: 23/00206/PAN
Ref:

Proposal of Application Notice

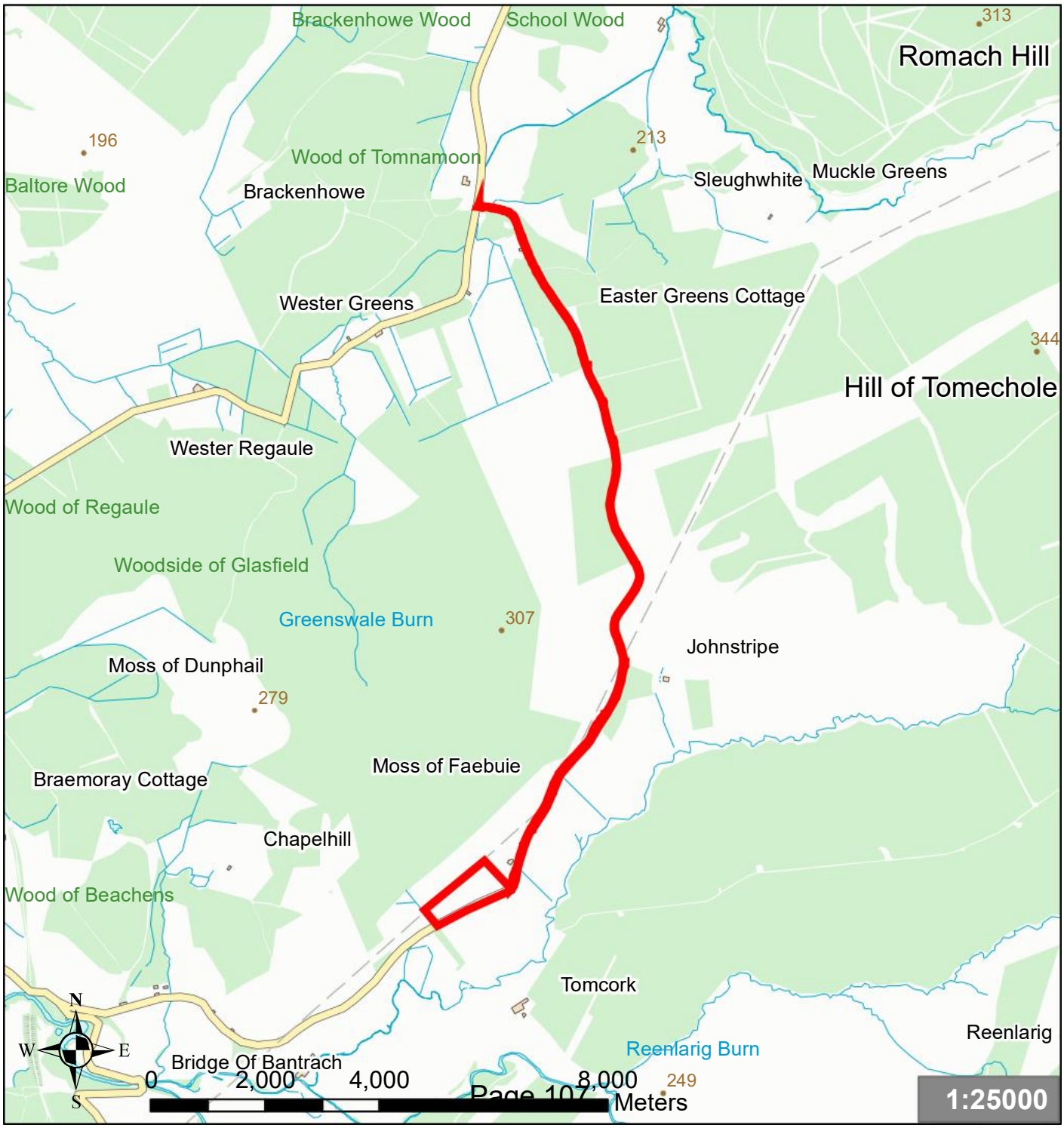
Item 9



Application Reference Number:

23/00206/PAN

Installation of an energy storage facility including the siting of battery enclosure power conversion units and transformers a substation hard standing area fencing vehicular access grid connection and ancillary works on Land To West Of Berryburn Substation



REPORT TO: **PLANNING AND REGULATORY SERVICES COMMITTEE ON 14 MARCH 2023**

SUBJECT: **PLANNING PERFORMANCE FRAMEWORK 2021/22**

BY: **DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT & FINANCE)**

1. REASON FOR REPORT

1.1 To inform the Committee the Planning Performance Framework (PPF) for 2021/2022 was submitted to the Scottish Government (SG) on 30 July 2022, covering the period from 1 April 2021 to 31 March 2022. This report provides a summary of feedback received from the Scottish Government on 22 December 2022 with specific reference to the Performance Markers Report and Red, Amber, Green (RAG) ratings for the 2021/2022 submission.

1.2 This report is submitted to Committee in terms of Section III E (1) of the Council's Scheme of Administration relating to exercising the statutory functions of the Council as Planning Authority.

2. RECOMMENDATION

2.1 It is recommended that the Committee:-

(i) note the Planning Performance Framework submitted to the Scottish Government on 30 July 2022 (Appendix 1);

(ii) note the feedback report received from the Scottish Government on 22 December 2022 (Appendix 2);

(iii) authorise the Head of Economic Growth & Development to submit the Planning Performance Framework for 2022/2023 to the Scottish Government by the end of July 2023 (or any other date that may be set);

(iv) note that the Planning Performance Framework will be reported to the first available Planning & Regulatory Services Committee following receipt of the feedback; and

(v) note the Planning Performance Framework 2021/22 will be circulated to all developers, stakeholders and internal services seeking comment/feedback to assist with continuous improvement to be fed back into the PPF for 2022/2023.

3. BACKGROUND

3.1 The Council has prepared PPF reports for the last ten years with the latest one covering 2021/22 submitted in July 2022. The main purpose of the PPF is to provide Ministers, Councils and the public with a greater understanding as to how a planning authority is performing and delivering high quality development on the ground.

3.2 In 2016/17 the Council received fifteen green awards for the first time.

3.3 The PPF submitted for 2021/22 is attached at **Appendix 1** and follows the updated template issued by the SG with a greater emphasis on the use of case studies to illustrate how key performance markers are met in Moray.

3.4 As part of the SG's feedback a summary of performance is included covering the last eight years since the PPF was introduced (tables below). This shows how year on year the number of key markers have been changed to green as well as avoiding slipping back into red.

Marker		13-14	14-15	15-16	16-17	17-18	18 – 19	19-20	20-21	21-22
1	Decision making timescales									
2	Processing arrangements									
3	Early collaboration									
4	Legal agreements									
5	Enforcement charter									
6	Continuous improvement									
7	Local development plan									
8	Development plan scheme									
9 & 10	LDP Engagement	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A
11	Regular and proportionate advice to support applications									
12	Corporate working across services									
13	Sharing good practice, skills and knowledge									

14	Stalled sites/legacy cases									
15	Developer Contributions									

Overall Markings (total numbers for red, amber and green)

2012-13	3	6	6
2013-14	2	5	6
2014-15	1	4	8
2015-16	1	3	9
2016-17	0	1	12
2017-18	0	1	14
2018-19	0	0	13
2019-20	0	0	13
2020-21	0	0	13
2021-22	0	0	13

Decision Making Timescales (weeks)

	13-14	**14-15**	**15-16**	**16-17**	**17-18**	**18-19**	**19-20**	**20-21**	**21-22**	**2021-22 Scottish Average**
Major Development	98.2	13.1	20.0	16.9	16.5	8.9	10.3	21.3	15.1	44.6
Local (Non-Householder) Development	13.5	8.5	7.5	7.2	6.6	6.5	6.5	7.1	6.8	13.5
Householder Development	7.1	5.8	6.3	5.7	5.3	5.3	5.7	6.7	6.2	8.7

4. FEEDBACK FROM SCOTTISH GOVERNMENT – PPF 2021/22

4.1 Written feedback was received on 22 December 2022 from the Minister for Public Finance, Planning and Community to the Council's Chief Executive, enclosing a Planning Performance Feedback report on the fifteen 'Performance Markers'.

4.2 The letters states "The reporting period which these reports cover has continued to present challenges for people working within planning, in the development sector and across Scotland's communities. Ensuring the system is appropriately resourced is key to improving the performance of planning, which is why in April I implemented the biggest change to planning fees in 8 years, with fees for most types of development increasing by between 25% and 50%. At that time I said I would expect to see this additional money invested in delivering improvements in Planning Services." "However I have recognised that resourcing is about more than just money and having a

pipeline of knowledgeable and skilled planners is essential to delivering our ambitions set out in NPF4".

4.3 The Performance Markers Report 2021/22 sets out the fifteen performance markers, each one receiving either a red, amber or green RAG rating. Fourteen markers have been awarded a green rating and one is not applicable. This is the fourth time all markers have been given a green award where applicable.

4.4 One of the key markers relates to decision-making refers to continuous reduction of average timescales for all development categories and this marker has been awarded a green status. Householder application determination rates have fallen slightly to an average of 6.2 weeks from 6.7 weeks; Local applications (non-householders) have also fallen slightly to 6.8 weeks from 7.1 weeks and major application average timescales has also fallen from 21.3 weeks to 15.1 weeks. Major applications are important to the Moray economy and the majority are covered by processing agreements which assist in determining them timeously and continue to be the number one priority along with fast tracking development proposals in town centres. All three development types for decision-making timescales are below the Scottish average.

4.5 One of the other key markers worthy of highlighting relates to the Development plan scheme, which identifies that the LDP was adopted within the 5 years of the current plan adoption and within the required timescale of the Development Plan Scheme. Having an up to date Local Development Plan is essential to Moray's economy.

5. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))

The ten year plan's top priority is a growing, diverse and sustainable economy. It covers business, employment, infrastructure, public services and developing sustainable communities. The PPF is a vital aspect of supporting and facilitating the Council's priority for economic growth and supports the Service Plan to deliver service improvements.

(b) Policy and Legal

Preparation of the PPF is a statutory responsibility for all Local Planning Authorities and preparation has to follow a strict template and timescale for submission.

(c) Financial implications

There are no direct financial implications arising from this report.

(d) Risk Implications

There is a reputational risk if this authority doesn't continue to demonstrate that continuous improvement is being made in all areas of the planning service.

(e) Staffing Implications
No staff implications as a result of this report.

(f) Property
None.

(g) Equalities/Socio Economic Impact
There are no equalities issues arising from this report.

(h) Climate Change and Biodiversity Impacts
None.

(i) Consultations
The Head of Economic Growth & Development, the Strategic Planning & Development Manager, the Legal Services Manager, Lissa Rowan (Committee Services Officer), the Equal Opportunities Officer, the Senior Engineer Transportation and Environmental Health and Trading Standards Manager have been consulted and comments received have been incorporated into the report.

6. CONCLUSION

6.1 The Planning Performance Framework submitted to the Scottish Government for 2021/22 and the associated feedback received demonstrates that decision making timescales are below the Scottish National Average, the Moray Local Development Plan has been adopted within the programmed timescale and over the last 12 months continuous improvements have been made improving the quality of the planning service supporting economic growth.

Author of Report: Beverly Smith
Development Management & Building Standards Manager

Background Papers:
Ref: Appendix 1 Planning Performance Framework 2021/2022
Appendix 2 Feedback letter dated 22 December 2022 from Minister for Public Finance, Planning and Community

PLANNING PERFORMANCE FRAMEWORK 11

ANNUAL REPORT 2021 - 2022





CGI visual - part of Elgin City Centre Masterplan - Levelling up fund bid

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Lossiemouth new and old bridges

FOREWORD

As Chair of the Planning & Regulatory Services Committee, I am delighted to endorse the Planning Performance Framework for 2021/22 as the last 12 months have been particularly challenging with teams working remotely from home and some returning to the office.

We have moved to a more delivery focussed planning service, working with communities, developers and the wider public to support the aspirations set out in draft National Planning Framework 4. We have prepared and consulted on a suite of Town Centre Improvement Plans, prepared additional policy guidance and are working with a number of partners to address long term vacant and derelict sites. We have also worked closely with partners to develop Moray's bid to the UK Levelling Up Fund.

We have recruited a new Climate Change team and a Community Wealth Building Officer who all sit within the Economic Growth and Development Service. A Climate Change Strategy has been approved by the Council and a Community Wealth Building Strategy is being drafted.

We have worked collaboratively on a new Masterplan for Buckie South, a long term growth area and have seen housing development progressing rapidly at Findrassie and Glassgreen in Elgin and Knockomie in Forres.

The case studies cover a range of subjects including the replacement of a dangerous pedestrian bridge in Lossiemouth, a review of consultations for planning applications, the formation of an internal working group to assist in implementing new permitted development rights and a project to manage enforcement workload through the Enterpise module in uniform.

Councillor Donald Gatt
Chair of the Planning and Regulatory Services Committee
Moray Council

Part 1

Qualitative Narrative and Case studies

Quality of Outcomes

Case Study 1
Replacement of Dangerous Lossiemouth Bridge

LOCATION & DATES:
July 2019 - May 2022

ELEMENTS OF A HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Outcomes

KEY MARKERS: 1, 3 & 12

KEY AREAS OF WORK
- Design
- Planning applications
- Development Management Processes
- Interdisciplinary Working
- Regeneration
- Active Travel

STAKEHOLDERS INVOLVED
- Development Management
- Authority Other Staff

OVERVIEW: In late 2018 Lossiemouth Community Development Trust (LCDT) approached Moray Council to discuss future options for a bridge to Lossiemouth's East Beach. The unknown ownership, subsequent lack of maintenance and relatively poor condition of the existing bridge gave concern that the bridge may become unsafe in time, severing access to a key attraction in the town. Options discussed included repair, replacement in the same location or a replacement elsewhere.

During a spell of warm weather in July 2019 significant numbers of beachgoers used the bridge and concern was raised at movement within the bridge structure. As the ownership of the bridge was unknown, the responsibility of ensuring the structure was safe fell to Building Standards.

The Building Standards service in conjunction with structural engineers assessed the bridge and deemed it to be unsafe for use at that time. A decision was then taken in terms of Section 29 of the Building (Scotland) Act 2003 that closure was necessary in order to protect public safety. The Council is obliged to act in these circumstances and the duty exists despite the Council not owning the bridge.

Following closure of the bridge, efforts of the LCDT ramped up to reinstate a link to the East Beach. Development Management acted as the point of contact for the LCDT to liaise with various council services and key stakeholders to identify the main issues and considerations. During this process it became clear there would be significant cost involved, regardless of replacement or repair. The Scottish Government committed funding to the project in September 2019.

As part of the Scottish Government funding, Moray Council became responsible for delivering the bridge and subsequent maintenance. Efforts were underway to determine ownership of the bridge and undertake survey work, in the midst of a global pandemic and lockdowns. Following public consultation and an options appraisal for reconnecting Lossiemouth to the East Beach, a tender was issued to erect a new bridge from the Esplanade to the East Beach.

The sudden closure of an important pedestrian link which connected Lossiemouth's promenade from its beach caused a significant amount attention and concern from the local businesses. The replacement bridge became a Council priority with Officers from Building Standards, Flood Risk Management and Development Management working closely together to ensure that the scheme that was approved on this site respected its important setting. Timing was critical and ensuring that the planning application was frontloaded with the necessary supporting information was paramount to delivering the planning consent in a few weeks.

GOALS: A planning application was submitted at the end of May 2021. The application was ready to report to the next available Planning and Regulatory Services Committee within the space of six weeks, with planning approval given to the bridge on 3 August 2021. The quick turnaround of the application was testament to the detailed pre-application discussions with relevant parties and the Council in formulating a design that worked for all key stakeholders. Works commenced on the bridge in late 2021.

OUTCOMES: The new bridge opened on 31 May 2022, re-establishing the connection between Lossiemouth and its treasured East Beach.

NAME OF KEY OFFICER

Andrew Miller, Senior Planning Officer
Email: Andrew.miller@moray.gov.uk

Quality of Service and Engagement

The last 12 months have been challenging in terms of continuing to deliver a high quality service and engagement whilst part of the team has been working remotely and partly in the office. In this regard we have relied heavily on our website to be the interface with our customers whilst still operating a duty service by phone. A few face-to- face meetings have now taken place with developers and agents but with Microsoft Teams meetings still being offered. This has allowed us to re-connect with developers and house builders. In light of this, we have made sure that our web site has been kept up to date.

Case Study 2
Extension of Permitted Development Rights Working Group

LOCATION AND DATES:
Jan 2021 - present

ELEMENTS OF A HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of service and engagement.

KEY MARKERS: 1, 6 & 13

KEY AREAS OF WORK

- Development Management Processes
- Process Improvement

STAKEHOLDERS INVOLVED:

- Authority Planning Staff
- Systems Support

OVERVIEW: The Town and Country Planning (GPDO and Use Classes) (Scotland) Amendment Order 2020 introduced a range of new permitted developments including classes relating to the conversion of agricultural and forestry buildings to residential and flexible commercial uses. The Council established a working group to deal with the new procedures and processes for dealing with these. The group produced templates for reports and decision notices and ensured processes were set up and coded for Uniform. Separate guidance notes for officers and consultees were produced and circulated. Training sessions were also held with the Development Management Team and with internal consultees. Staff also liaised with other rural authorities to ensure a consistency of approach and to contribute towards the preparation of appropriate guidance ahead of the commencement of the regulations on 1 April 2021. The group continues to monitor the system and advise colleagues and stakeholders of any updates.

GOALS: The goal of the project was to ensure that adequate procedures and processes were in place in time for the changes to the GPDO and to monitor these during the first year of applying these permitted development rights.

OUTCOMES: The necessary templates for reports and decisions notices are now in place and have been tested in 'live' situations. The development management team and other relevant consultees are aware of the changes and it has been an opportunity to refresh understanding of prior notification procedures generally. Working with colleagues from other authorities has provided an opportunity to share experience and ensure consistency across authorities.

NAME OF KEY OFFICERS
Lisa MacDonald, Senior Planning Officer
Email: lisa.macdonald@moray.gov.uk

Case Study 3
Review of Consultations for Planning Applications

LOCATION AND DATE:
May 2022

ELEMENTS OF A HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Service & Engagement, Governance

KEY MARKERS: 1, 3 & 6

KEY AREAS OF WORK:
- Development Management Processes
- Process Improvement

STAKEHOLDERS INVOLVED:
- Authority Planning Staff
- Systems Support

OVERVIEW: During the course of the past year, there was concern that officers were consulting with consultees unnecessarily or missing consultees when dealing with applications. Unnecessary consultation was wasting time of consultees, who may not need be involved in the particular applications/development types. More importantly, missed consultations were causing delay to issuing of decisions when it transpired they were missed during the latter period of application determination.

In order to bring some consistency to the consultee approach, a comprehensive list of consultees has been collated. This document contains information on when to consult parties, along with contact details in one place. Previously this information was held in different documents, meaning any changes were not reflected in all records.

GOALS: To improve and deliver an efficient and effective Planning Service to support the local economy.

OUTCOMES: Implemented in early spring 2022, the comprehensive consultee list will be a tool for all Development Management staff in their day-to-day work. Having an up to date single point of reference will enable consultees to focus on relevant and important work, whilst also ensuring all they are consulted at point of registration. This will subsequently lead to early identification of issues and ensure applications are determined as early as possible. It will also ensure any changes to consultees and their consulting requirements are in one accurate and up-to-date document.

NAME OF KEY OFFICERS
Andrew Miller, Senior Planning Officer
Email: Andrew.miller@moray.gov.uk

Case Study 4
Policy Guidance to support Moray Local Development Plan 2020

LOCATION AND DATES:
February 2022 to June 2022

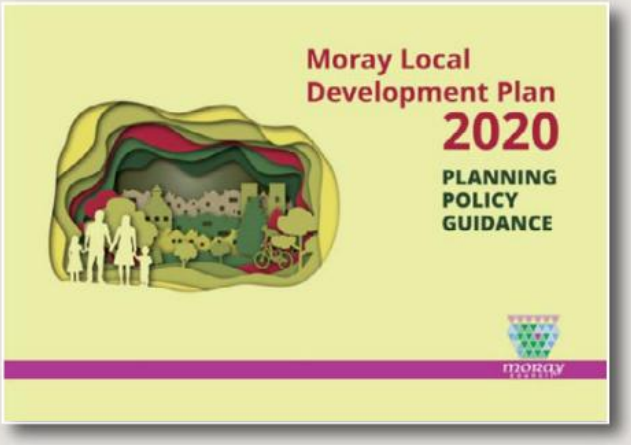
ELEMENTS OF HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Service and engagement and culture of continuous improvement.

KEY MARKERS: 1, 6, 11 & 12

KEY AREAS OF WORK
- Policy advice and corporate working

STAKEHOLDERS INVOLVED
- Strategic Planning and Development
- Development Management
- Transportation

OVERVIEW: To support interpretation and implementation of the new policies in the Moray Local Development Plan 2020, further additional guidance has been prepared on a number of topics. This is aimed at assisting developers to understand the policy requirements and give examples to help the development management process.
www.moray.gov.uk/moray_standard/page_134856.html



The guidance covers policy DP1 Development Principles, DP7 Retail/ Town Centres, PP3 Infrastructure and Services and updates previous planning policy guidance for EP7 Trees and Woodlands and EP10 Listed Buildings. The specific aspects of the above policies addressed within the guidance are;

- Methodology used to assess the impact of proposals on the sunlight and daylight of neighbouring properties
- The type and level of supporting information that applicants are required to submit to demonstrate compliance with DP7.
- The definition of a bedroom to assess developer obligations and parking standards
- Updated guidance to clearly address the need for tree root protection and clarify definitions of tree and woodland removal
- Updated guidance to clarify the type and level of information required to demonstrate that enabling development is the only option to retain a listed building

GOALS: Provide further guidance on aspects of policy to assist with policy interpretation.

OUTCOMES: Approved and operational additional guidance to assist with consistent policy interpretation

NAME OF KEY OFFICER:
Eily Webster, Principal Planning Officer
Email: eily.webster@moray.gov.uk

Case Study 5
Design Guide for Dallas Dhu, Forres

LOCATION AND DATES:
October 2021 to June 2022

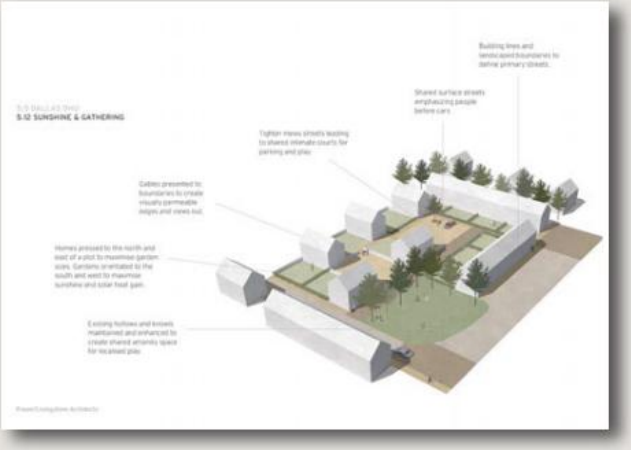
ELEMENTS OF HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Policy advice and engagement

KEY MARKERS: 1, 6, 11 & 12

KEY AREAS OF WORK
- Policy advice and partnership working

STAKEHOLDERS INVOLVED
- Strategic Planning and Development
- Transportation
- Housing
- Altyre Estate
- Appointed architects Fraser Livingstone.

OVERVIEW: To update and provide further level of detail to the approved Dallas Dhu, Forres Masterplan and act as a bridge between Masterplan and detailed design stage, which has now gone out to tender. The brief was commissioned by Altyre Estate to ensure the high quality placemaking aspirations of the landowner is maintained through the procurement and detailed design stages.
The site is the flagship project for the Housing Mix Delivery Project one of 8 projects in the Moray Growth Deal which are being supported through UK and Scottish Government funding. The Dallas Dhu project will embed digital healthcare into a smart community and act as an innovation demonstration site.



GOALS: To provide an updated design brief to maintain high placemaking aspirations.

OUTCOMES: Design guide prepared in collaboration between private and public sector, which is being used to inform the procurement process.

NAME OF KEY OFFICER:
Emma Gordon, Planning Officer
Email: emma.gordon@moray.gov.uk

Hilda Puskas, Senior Project Manager Housing Mix Delivery
Email: hilda.puskas@moray.gov.uk

Case Study 6
Vacant and Derelict land and property

LOCATION AND DATES:
September 2021 to present

ELEMENTS OF HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Outcomes, Quality of Service and Engagement

KEY MARKERS: 6, 11 & 12

KEY AREAS OF WORK
- Climate Change
- Corporate Working

STAKEHOLDERS INVOLVED
- Property
- Transportation
- Finance

OVERVIEW: In preparation for a greater focus on regeneration of vacant and derelict property in National Planning Framework 4, Council officers have carried out a comprehensive survey of all vacant and derelict property, which extends well beyond the annual returns provided to Scottish Government.

This baseline information is now being used to prioritise sites against a range of criteria and develop an action plan to be embedded within the new Local Development Plan. This work will also help to inform the percentage housing land target to be met from brownfield land.

GOALS: Prioritised list of brownfield sites for inclusion within next Local Development Plan. Baseline information to inform housing land requirements.

OUTCOMES:
- Brownfield sites identified within next Local Development Plan.
- Ownership and constraints on vacant and derelict sites known.
- Ambitious but achievable brownfield housing land target.

NAME OF KEY OFFICER:
Rowena MacDougall, Senior Planning Officer
Email: rowena.macdougall@moray.gov.uk

Case Study 7
Town Centre Improvement Plans

LOCATION AND DATES:
August 2021 to present

ELEMENTS OF HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Outcomes, Quality of Service and Engagement

KEY MARKERS: **6, 9, 11 & 12**

KEY AREAS OF WORK
- Town Centre Regeneration
- Active Travel

STAKEHOLDERS INVOLVED
- Community Councils and community amenity/project groups
- Council Transportation

OVERVIEW: Following completion of the Elgin City Centre Masterplan, officers prepared and consulted upon a series of Town Centre Improvement Plans (TCIP) aiming to support the regeneration of town centres in Moray, setting out proposals including bringing vacant and derelict sites back into use, improving active travel connections, greening and other streetscape improvements in order to create vibrant, attractive, green, healthy, safer and inclusive town centres.

The TCIP cover Aberlour, Buckie, Dufftown, Forres, Keith and Lossiemouth and were subject to public consultation running from 18th January to 14th March 2022. Consultation responses and final plans will be reported back to the Council's Planning and Regulatory Services Committee in August 2022. Discussions are ongoing to use Participatory Budgeting exercise to distribute economic recovery funding which has been provided to support some of the projects within the TCIP.

GOALS: Support town centre regeneration and diversification.

OUTCOMES:
- Agreed TCIP.
- Budget allocated to support regeneration.
- Plans to provide basis for working with communities to secure funding to deliver projects.

NAME OF KEY OFFICER:
Eily Webster, Principal Planning Officer
Email: eily.webster@moray.gov.uk

Case Study 8
Elgin City Centre Masterplan- UK Levelling Up Fund bid

LOCATION AND DATES:
June 2021 to present

ELEMENTS OF HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Outcomes, Quality of Service and Engagement

KEY MARKERS: 9 & 12

KEY AREAS OF WORK
- Town Centre Regeneration
- Active Travel

STAKEHOLDERS INVOLVED
- Elgin BID
- Elgin Community Council
- Council Strategic Planning
- Transportation and Consultancy services
- Highlands and Islands Enterprise
- Property owners
- MADE
- Moray College/ UHI
- Historic Environment Scotland.

OVERVIEW: Project team formed to consider options for a submission to the second round of the UK Levelling Up Fund. Team considered various options for projects within Moray against the criteria and aims of the Fund. A long list of options was reported to Council in June 2022 and a series of feasibility and design works were commissioned along with an economic impact assessment to move to a short list when details of the second round of funding and deadlines were announced.

The short list of projects formed a cohesive package of projects aiming to deliver significant change in support of the approved Elgin City Centre Masterplan. The projects include;

- Addressing transportation and flooding issues to bring two long vacant/ derelict sites back into use as a wetland park and opening up pockets of development for commercial uses.
- Bringing a number of vacant, derelict and underused properties in the Centre into more active use for mixed retail, commercial, residential, creative and student social space, with associated traffic control measures.

- Projects within Cooper Park to bring the pond back into use for recreation, the creation of an outdoor performance space, repurposing the toilet block and extending it to create a café, ticket office and changing places facility.

The Benefit to cost ratio (BCR) for the project is 2.7 and it is an example of planners being proactive to secure funding to deliver change and support the ambitions for the planning system.

GOALS:

- Bringing vacant and derelict sites back into use
- Promoting active travel
- Supporting and creating employment opportunities
- Inclusive and accessible town centre
- Reducing carbon
- Attracting investment and footfall

OUTCOMES:

- The outcome of the submission will be known in October 2022. If successful the projects will deliver a BCR of 2.7 and 2,950 employment years.
- Projects will bring 7 properties back into use, create new wetland park, enhance recreation offer within Cooper Park, provide student social space, 50 residential units, considerable commercial space, improve active travel and reduce car use.

NAME OF KEY OFFICER:

Gary Templeton, Strategic Planning and Development Manager
Email: gary.templeton@moray.gov.uk

Diane Anderson, Senior Engineer (Transportation)
Email: diane.anderson@moray.gov.uk

GOVERNANCE

The Planning & Regulatory Services Committee has continued to meet more regularly over the last 12 months with more special meetings being arranged to ensure that when planning application reports were ready there was no delays as regular meetings are held every two months. Committee site visits have been temporarily halted and enhanced committee information packs have continued to be introduced.

In terms of average performance during 2020/21 our average timescales have increased slightly across all development types which is as a direct result of COVID-19 and delays in site visits and the necessary input from a number of consultees. However, the rates are still below the Scottish average. A significant effort across all sections of the Council have dedicated time to prevent back logs building–up and cases becoming stalled within the system.

CULTURE OF CONTINUOUS IMPROVEMENT

One of the key elements to delivering high quality outcomes on the ground is to ensure that Pre-application advice is robust and proportionate to the development being proposed. Identifying supporting information at an early stage can be critical to ensuring that developments that have time constraints are guided through the regulatory process. Part of this process is ensuring that all necessary consultations both internally and externally have been carried out to ensure that all issues have been identified before the application is submitted. A review was undertaken of all consultees and named contacts with the objective of having a definitive list that could be easily accessed and updated.

The Employee Review Development Programme has continued to play a large part in identifying training opportunities and service improvements through regular review meetings. The leadership Forum has met twice and there has been regular Management Forums arranged through teams.

In 2021/22 Officers from the Planning service attended the following training/CPD events:

- SEPA Triage Framework meetings – held remotely
- Leadership Forum – Moray Council – held remotely
- Heads of Planning Conference – held remotely
- RTPI Highland Chapter Events
- Brodies – legal Updates
- SEPA Training
- Carbon Literacy Training
- Treasury Green Book Training
- Introduction to Economic Development
- Project Management training
- First Line Manager Training

Officers also Chaired and attended the following forums remotely:

- North of Scotland Development Plans Forum
- Heads of Planning Executive Committee
- Heads of Planning Development Plans Sub-Committee
- Heads of Planning Development Management Sub-Committee
- Heads of Planning Energy Sub-Committee

Case Study 9
Planning Enforcement & Enterprise/Uniform System

LOCATION AND DATES:
October 2021 - May 2022

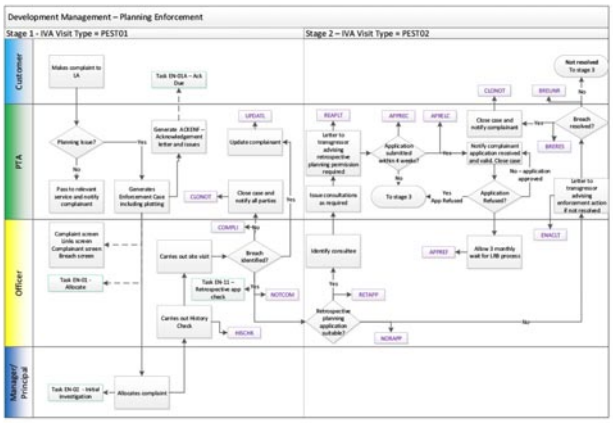
ELEMENTS OF HIGH QUALITY PLANNING SERVICE THIS STUDY RELATES TO:
Quality of Service and engagement, Governance

KEY MARKERS: 1 & 13

KEY AREAS OF WORK
- Enforcement
- Process Improvement

STAKEHOLDERS INVOLVED
- Authority Planning Staff
- Systems Support

OVERVIEW: All development management case work is managed through the enterprise module. It was identified that enforcement cases were one of the areas that was not covered. A small working group was established to agree the process of dealing with an enforcement investigation from start to finish with key tasks being identified along the way. The process was mapped and a bespoke system designed. This required input from the Enforcement teams, Planning Technical Assistant, Systems Support Officer and Principal Planning Officers.



GOALS: Ensuring that Enforcement cases can be tracked through uniform and the enterprise module to ensure that cases are more easily tracked and workload can be managed more effectively. Improving efficiency and streamlining the process were key goals identified.

OUTCOMES:
Key tasks have been set up in the enterprise module of the different stages of an enforcement investigation. Cases can be reallocated more easily and managed. The process has just been implemented and will be the subject of a progress review.

NAME OF KEY OFFICER:
Beverly Smith, Development Management & Building Standards Manager
Email: Beverly.smith@moray.gov.uk

Part 2

Supporting Evidence

Part 2 of this report was compiled using evidence from a variety of sources including:

- Development Plan Services Service Plan
- A range of committee reports
- Case Studies
- Informal benchmarking
- Partnership working

Case Study Topics	Issue covered by case study	Case Study Topics	Issue covered by case study
Design	**CS 4, pg 6**	Planning Applications	**CS 2 & 4, pg 4 & 6**
Climate Change	**CS 6, pg 8**	Interdisciplinary Working	**CS 1, pg 2**
Conservation	**CS 7, pg 9**		
Biodiversity	**CS 7, pg 9**	Collaborative Working	**CS 1& 3, pg 2 & 5**
Regeneration	**CS 7 & 8, pg 9 & 10**	Community Engagement	
Environment	**CS 6 & 7, pg 8 & 9**		
Greenspace	**CS 6, 7 & 8, pg 8, 9 & 10**	Placemaking	
Town Centres	**CS 6, 7 & 8, pg 8, 9 & 10**	Design Workshops/ Charrettes	**CS 5, 7 & 8, pg 7, 9 & 10**
Masterplanning	**CS 5 & 7, pg 7 & 9**		
LDP & Supplementary Guidance	**CS 4, pg 6**	Place Standard	
		Performance Monitoring	
Housing Supply		Process Improvement	**CS 1 & 9, pg 2 & 13**
Affordable Housing	**CS 6 & 7, pg 8 & 9**	Project Management	
Economic Development	**CS 6 & 7, pg 8 & 9**	Skills Sharing	**CS 2, pg 24**
		Staff Training	**CS 2 & 3, pg 4 & 5**
Enforcement	**CS 9, pg 13**		
Development Management	**CS 2,3 & 6, pg 4, 5 & 6**	Online Systems Data and Information	
Processes	**CS 2,4 & 9, pg 5, 6 & 13**	Digital Practice	
		Transport	

To assist with the 14 key performance markers relevant hyperlinks have been added in below under the four sub-headings when combined together define and measure a high-quality planning service:

Quality of Outcomes

Making a Planning Application – What Information is Required?

Supporting Information Checklist

Heads of Planning Scotland Guidance Note on National Standards for Validation and determination of planning applications and other related consents

Developer Obligations Supplementary Guidance

Flood Risk and Drainage Supplementary Guidance

Moray Onshore Wind Energy Supplementary Guidance – October 2020

Open Space Strategy – January 2018

Dallas Dhu Masterplan – 2020

Kinloss Golf Course Masterplan

Guidance Note on Landscape and Visual Impacts of Cumulative Build-up of Houses in the Countryside – Approved August 2017

Local Development Plan Additional Guidance

Elgin City Centre Masterplan

Buckie South Masterplan

Elgin South Masterplan

Quality of Service & Engagement

Moray Local Development Plan Scheme – January 2022

Moray Housing Land Audit - 2022

Employment Land Audit 2022

Making a Preliminary Enquiry – local developments guidance and form

Major Developments Pre-application Advice & EIA

Planning Enforcement Complaint Form

Processing Agreements

Moray Council Complaints

Planning Enforcement Charter – 2020-2022

Customer Care

Development Management Service Charter

Governance

The Moray Council Corporate Plan 2023

Scheme of Delegation:

Committee Diary:

Culture of Continuous Improvement

Development Services Service Plan

Performance Markers Report 2021/22

No.	PERFORMANCE MARKER	EVIDENCE
1.	**Decision-making:** authorities demonstrating continuous evidence of reducing average timescales for all development types	See National Headline Indicators in the PPF. All average timescales are lower than the average timescales for Scotland. The majority of major applications covered by processing agreements, 15.1 weeks. Slight decrease for both Local (Non-householder) applications 6.8 weeks and Householder applications 6.2 weeks
2.	**Project management:** offer of processing agreements (or other agreed project plan) made to prospective applicants in advance of all major applications and availability publicised on planning authority website	Offer and encourage use of PA as a project management tool for major applications. Template and guidance publicised on website under Pre-application advice section for Major Developments **Website link:** **www.moray.gov.uk/moray_standard/page_105746.html**
3.	**Early collaboration** with applicants and consultees: • Availability and promotion of pre-application discussions for all prospective applications; • Clear and proportionate requests for supporting information	Offer of pre-application advice available on website with standard form, guidance and charges. All pre-application requests are logged in uniform **Website link:** **www.moray.gov.uk/moray_standard/page_41735.html**
4.	**Legal Agreements:** conclude (or reconsider) applications within 6 months of 'resolving to grant'	Front loading of Heads of Terms and identifying timescales in processing agreements. Legal & Developer Obligation team work together with Development Management to ensure consistency. Planning Committee agreed a four month target with mechanisms to report back to committee. **Website link:** **www.moray.gov.uk/moray_standard/page_123173.html**
5.	**Enforcement Charter** updated/re-published	Enforcement Charter reviewed and republished on March 2022 with enhanced focus on monitoring planning conditions for major developments. **Web site link:** **www.moray.gov.uk/downloads/file132655.pdf**

No.	PERFORMANCE MARKER	EVIDENCE/COMMENTS
6.	**Continuous Improvement:** • Progress ambitious and relevant service improvement commitments identified through PPF repor	See case studies and details of continuous improvement in the PPF.
7.	**Local development plan** less than 5 years since adoption	Moray Local Development Plan 2020 adopted on 27th July 2020 - replaced within 5 years. **www.moray.gov.uk/MLDP2020**
8.	**Development Plan Scheme** - next LDP: • on course for adoptation within 5 year cycle • project planned and expected to be delivered to planned timescale	Yes, Development Plan Scheme was approved January 2022. The Scheme sets out indicative timescales until further details for each stage of the new Local Development Plan process are finalised through new Regulations and Guidance. The 2023 Development Plan Scheme will be informed by NPF4 and new LDP process and will set out key milestones. At present early project planning work on the Evidence Report has started and a new Senior Planning Officer post has been created to lead on this work. LDP will be project managed and delivered within the timescales set out in the annual DPS. A number of internal workshops have taken place for planning officers to consider and inform the next DPS.
9.	**Stakeholders** including Elected Members, industry, agencies the public and Scottish Government are engaged appropriately through all key stages of development plan preparation	N/A
10.	**Kept for data continuity**	
11.	**Production of relevant and up to date policy advice**	See case studies, further additional policy guidance has been published and a design brief for Dallas Dhu, Forres

No.	PERFORMANCE MARKER	EVIDENCE/COMMENTS
12.	**Corporate working across services** to improve outputs and services for customer benefit (e.g: protocols; joined up services; single contact; joint pre-application advice)	Protocols are in place for joint working with the Cairngorms National Park Authority. Partnership agreement with Aberdeenshire Council to deliver our Archaeology Service/advice. Pre-application advice is delivered with a single point of contact covering all internal and external consultees. Production of relevant and up to date policy - see case studies, further policy guidance has been published and a design brief for Dallas Dhu, Forres
13.	**Sharing good practice, skills and knowledge** between authorities	Chair Heads of Planning Development Management Sub-Committee and attend Executive Committee, Energy Sub- Committee, Development Plan sub-Committee, North East Scotland Local Biodiversity Action Plan Partnership and North of Scotland Development Plans Forum, various national planning and health working groups. Peer review of PPF with Neighbouring authorities – Benchmarking meeting Scotland Forestry Liaison Meetings Annual Liaison meetings/ Training with SEPA & SNH
14.	**Stalled Sites/legacy cases:** conclusion/withdrawal of planning applications more than one-year-old	No stalled cases over a year old all progressed or waiting S.75 acknowledgement. All covered by processing agreements.
15.	**Developer Contributions:** clear expectations • set out in development plan (and/or emerging plan); and • in pre-application discussions	Adopted Supplementary Guidance on Developer Obligations to support the new Local Development Plan. The Evidence Base is reviewed regularly and new education, health and transport infrastructure is set out in the LDP. An Infrastructure Delivery group meets regularly to monitor progress and discuss any issues arising. Infrastructure requirements and supporting policy are included within the Local Development Plan to give early advice to developers and a free indicative developer obligation assessment service is provided to help inform developers as they consider proposals.

Part 3

Service Improvements 2022/23

Service Improvements in the coming year:

- Continue to implement the legislative requirements from the Planning Act 2019
- Review & Embed SEPA Triage Framework into procedures
- Meet main agents to ensure lines of communication are effective
- Continue to implement Enforcement & Condition Discharging requests into Enterprise in Uniform
- Implement new discharge of conditions procedure in line with the Enforcement Charter 2022 -2024
- Meet with Homes for Scotland representatives to discuss NPF4 policies and any local issues
- Complete carbon literacy training for all planners
- Introduce Performance Indicators for completing Quality Audit process in tandem with streamlining process
- Review approach to regeneration and delivery of LDP projects

Delivery of service improvements in 2021/22:
Looking back at our service improvements we identified in 2021/22 we have made progress with many of them despite the COVID19 challenges. As a result of a change in our practices this has highlighted the requirement to prioritise other service improvement commitments (see above).

Commitment: Continue to implement the legislative requirements arising from the Planning Act 2019
Progress: Ongoing and been delayed due to COVID19. Propose to set up a small number of working groups looking at how some of the policies will be delivered.

Commitment: Embed the implementation of Moray Local Development Plan 2020 & Supplementary Guidance
Progress: Further supplementary policy guidance produced.

Commitment: Review Digital Resources and requirements
Progress: ICT strategy prepared by service.

Commitment: Review site visit procedures
Progress: Complete

Commitment: Review Consultee Input into Planning applications
Progress: Complete

Commitment: Implement Enforcement & Condition Discharging requests into Enterprise in Uniform
Progress: Ongoing and rolled into 2022/23

Commitment: Review communication methods with all customers.
Progress: Ongoing and rolled onto 2022/23

Commitment: Review monitoring and discharge of conditions in line with the Enforcement Charter 2020 -2022
Progress: Partially complete and ongoing

Commitment: Review of Open Space Strategy
Progress: Early discussions and planning. Delayed while LDP Regulations and Guidance are finalised.

Commitment: Consult on draft Elgin City Centre Masterplan
Progress: Completed. Masterplan was approved in January 2021 following extensive engagement.

Commitment: Prepare development briefs for first tranche of stalled sites
Progress: Not progressed.

Commitment: Complete Action/ Delivery Programme for LDP2020
Progress: Completed and officers working through the actions which are reported through an annual Monitoring Report

Commitment: Prepare new Monitoring Framework to support LDP2020
Progress: Completed and implemented.

Commitment: Prepare indicative Regional Spatial Strategy
Progress: Completed.

New development at Findrassie, Elgin

Part 4

National Headline Indicators (NHI's)

A: NHI KEY OUTCOMES - DEVELOPMENT PLANNING	2021-22	2020-21
LOCAL & STRATEGIC DEVELOPMENT PLANNING		
• Age of local/strategic development plan(s) (full years) at the end of the reporting year. *Requirement: less than 5 years*	two years MLDP 2020 Adopted	One year MLDP 2020 Adopted
• Will the local/strategic development plan be replaced by their 5th anniversary according to the current development plan scheme? (Y/N)	Yes	Yes
• Has the expected date of submission of the plan to Scottish Ministers in the development plan scheme changed over the past Year?	No	No
• Were development plan scheme engagement/consultation commitments met during the year? (Y/N)	Yes	Yes
EFFECTIVE LAND SUPPLY AND DELIVERY OF OUTPUTS		
• Established housing land supply units	12,192 units	12,346 units
• 5-year effective housing land supply programming	3,242 units	2,766 units
• 5-year effective housing land supply total capacity	5,365 units	5,508 units
• 5-year effective housing supply target	2,070 units	2,070 units
• 5-year effective housing land supply (to one decimal place)	13 years	13.3 years
• Housing approvals	285 units	463 units
• Housing completions over the last 5 years	1,752 units	1,688 units
• Marketable employment land supply	100.37 ha	101.68 ha
• Employment land take-up during reporting year	4.74 ha	4.68 ha

B: NHI Key Outcomes - DEVELOPMENT MANAGEMENT	2021-22	2020-21
DEVELOPMENT MANAGEMENT		
Project Planning		
• Percentage and number of applications subject to pre-application advice	5.7% 36	7.8% 50
• Percentage and number of major applications subject to processing agreement	60% 3	57% 4
Decision Making		
• Applications approval rate	95.3%	92.5%
• Delegation rate	97.1%	96.7%
• Validation	58.3%	48.2%
Decision Making Timescales		
Average number of weeks to decisions:		
• Major developments	15.1	21.3
• Local development (non-householder)	6.8	7.1
• Householder developments	6.2	6.7
Legacy Cases		
• Number cleared during reporting period	0	0
• Number remaining	0	0

C: NHI Key Outcomes - ENFORCEMENT ACTIVITY	2021-22	2020-21
• Time since enforcement charter published/reviewed	5 months	17 months
Requirement: review every two years		
• Cases Take up	302	328
• Notices served	3	1
• Reports to the Procurator Fiscal	0	0
• Prosecutions	0	0
• Number of breaches resolved	241	264

Part 5

Scottish Government Official Statistics

A: Decision-making timescales (based on 'all applications' timescales) 2021/22

CATEGORY	TOTAL NUMBER OF DECISIONS 2021-22	AVERAGE TIME WEEKS 2021-22	AVERAGE TIME WEEKS 2020-21
Major Developments	**5**	**15.1**	**21.3**
All Local Developments	**557**	**6.5**	**6.9**
Local: less than 2 months	482	5.6	6.1
Local: more than 2 months	75	12.4	12.5
Local Developments (non-householder)	**302**	**6.8**	**7.1**
Local: less than 2 months	254	5.4	6.0
Local: more than 2 months	48	13.8	13.0
Householder Developments	**255**	**6.2**	**6.7**
Local: Less than 2 months	228	5.8	6.2
Local: more than 2 months	27	10.0	11.0
Housing	**132**	**7.4**	**6.7**
Local: less than 2 months	111	5.4	6.2
Local: more than 2 months	21	17.7	11.0
Business and Industry	**110**	**6.2**	**6.7**
Local: less than 2 months	93	5.4	6.0
Local: more than 2 months	17	10.8	12.6
Other Developments	**42**	**6.3**	**5.9**
Local: Less than 2 months	36	5.7	5.4
Local: more than 2 months	6	10.1	9.2
EIA developments	1	6.9	0
Other consents			
All Other Consents	69	6.1	7.5
Listed Buildings & Conservation Area	45	7.2	7.4
Advertisements	10	4.2	6.1
Hazardous Substances	3	7.0	42.4
Other consents and certificates	11	2.9	-
Planning/legal agreements**			
(major applications)	0	0	12.7
(local applications)	2	3.5	13.6

B: Decision-making: Local Reviews and Appeals

TYPE	TOTAL NUMBER OF DECISIONS	ORIGINAL DECISION UPHELD 2021-22		2020-21	
		No	%	No	%
Local reviews	15	6	40%	12	75%
Appeals to Scottish Ministers	1	1	100%	0	0%

Part 6

Workforce Information

This information requested in this section is an integral part of providing the context for the information in part 1-5. Staffing Information should be a snapshot of the position on the 31 March.

	TIER 1	TIER 2	TIER 3	TIER 4
Head of Planning Service			1	2

Note: Tier 1 = Chief Executive, Tier 2 = Directors, Tier 3 = Heads of Service, Tier 4 = Managers

RTPI QUALIFIED STAFF	HEADCOUNT
Chartered Staff	**15**

STAFF AGE PROFILE	HEADCOUNT
Under 30	3
30-39	4
40-49	6
50 and over	7

CORPORATE DIRECTOR OF ECONOMIC DEVELOPMENT, PLANNING AND INFRASTRUCTURE
Rhona Gunn

HEAD OF DEVELOPMENT SERVICES
Development Management, Development Plans, Building Standards, Community Safety, Economic Development, Environmental Health, Trading Standards and Museums
Jim Grant (HOPS)

DEVELOPMENT MANAGEMENT AND BUILDING STANDARDS MANAGER
Beverly Smith (MRTPI) (HOPS)

Principal Building Standards Officer
William Clark

Senior Building Standards Officer
Daniel Last

X2 Building Standards Officers
Scot Robertson
Emma Thomas

X1 Building Standards Inspector
Michael Little

Building Standards Assistant
Sybil Mackie

System Technical Assistant
Dionne McLennan

Senior Building Standards Officer
Michael Andrew

X2 Building Standards Officers
Jonathan Muir
Callum Ord

X2 Building Standards Inspector
Frank Riddell
Neil Dow

Principal Planning Officer
Richard Smith (MRTPI)

X3 Planning Officer
Emma Mitchell (MRTPI)

Sheila Bernard (MRTPI)

Dominic Batty

Principal Planning Officer
Neal MacPherson (MRTPI)

Senior Planning Officer
Lisa MacDonald (MRTPI)

Planning Officer
Fiona Olsen (Associate RTPI)

X2 Planning Technical Assistant
Teresa Ruggeri
Vacant Post

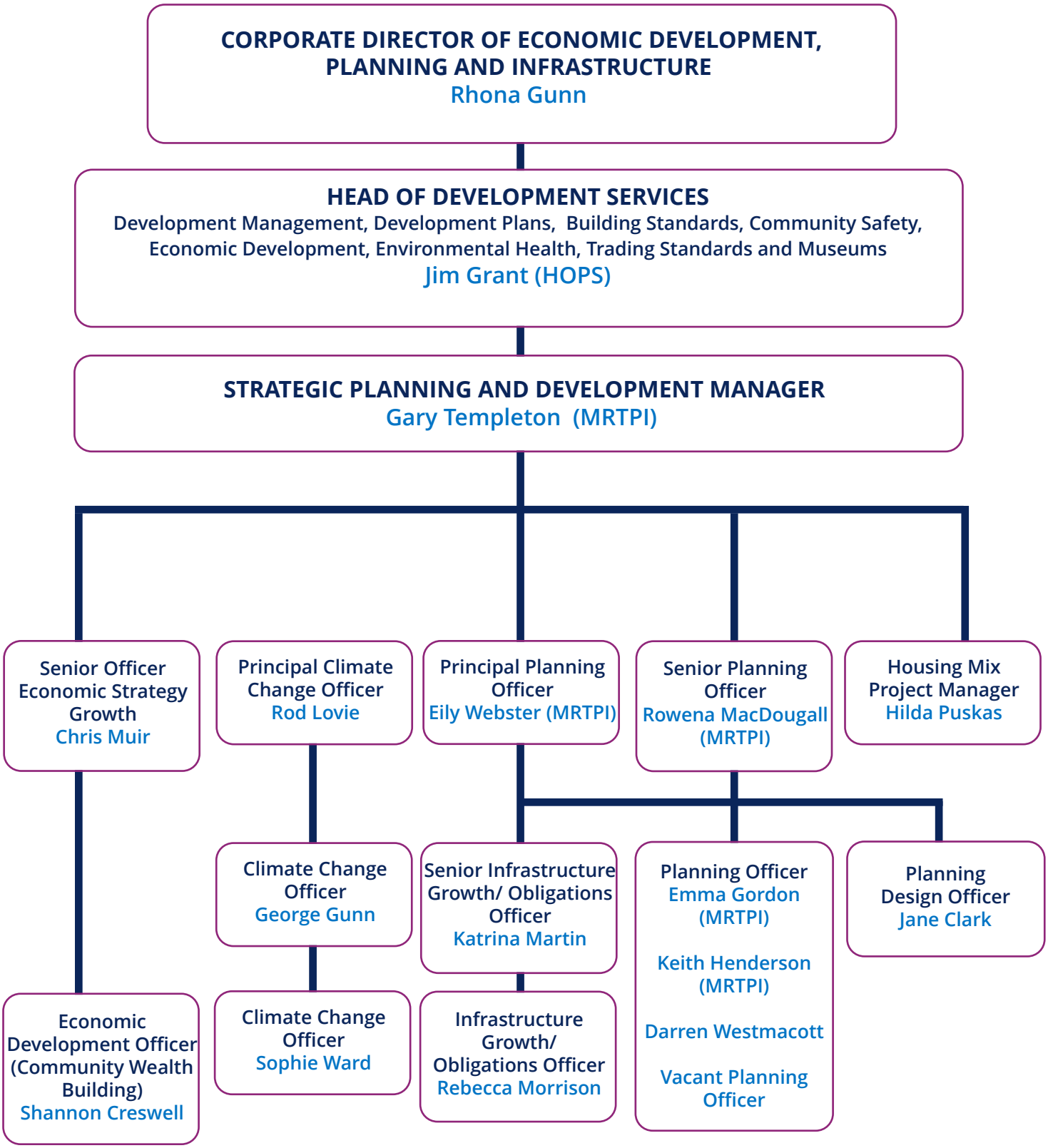
Senior Planning Officer
Andrew Miller (MRTPI)

X3 Planning Officer
Ian Drummond (MRTPI)

Shona Strachan (MRTPI)

Katherine Donnachie (MRTPI)

ENFORCEMENT TEAM
Enforcement Officer
Stuart Dale
Condition Compliance Officer
Harry Gordon


CORPORATE DIRECTOR OF ECONOMIC DEVELOPMENT, PLANNING AND INFRASTRUCTURE
Rhona Gunn
HEAD OF DEVELOPMENT SERVICES
Development Management, Development Plans, Building Standards, Community Safety, Economic Development, Environmental Health, Trading Standards and Museums
Jim Grant (HOPS)
STRATEGIC PLANNING AND DEVELOPMENT MANAGER
Gary Templeton (MRTPI)
Senior Officer Economic Strategy Growth
Chris Muir
Principal Climate Change Officer
Rod Lovie
Principal Planning Officer
Eily Webster (MRTPI)
Senior Planning Officer
Rowena MacDougall (MRTPI)
Housing Mix Project Manager
Hilda Puskas
Climate Change Officer
George Gunn
Senior Infrastructure Growth/ Obligations Officer
Katrina Martin
Planning Officer
Emma Gordon (MRTPI)
Keith Henderson (MRTPI)
Darren Westmacott
Vacant Planning Officer
Planning Design Officer
Jane Clark
Economic Development Officer (Community Wealth Building)
Shannon Creswell
Climate Change Officer
Sophie Ward
Infrastructure Growth/ Obligations Officer
Rebecca Morrison

PART 7

Planning Committee Information

COMMITTEE & SITE VISITS*	NUMBER PER YEAR
Full council meetings	13
Planning committees	9
Committee site visits	0
LRB meetings*	9
LRB site visits	0

* This relates to the number of meetings of the LRB. The number of applications going to LRB are reported elsewhere.

New development ALba Place, Elgin

Ministear airson Ionmhas Poblach, Dealbhachadh agus Beartas Còimhearsnachd
Minister for Public Finance, Planning and Community Wealth
Tom Arthur MSP

T: 0300 244 4000
E: scottish.ministers@gov.scot

Scottish Government
Riaghaltas na h-Alba
gov.scot

Roddy Burns
Chief Executive
Moray Council

22 December 2022

Dear Roddy Burns

I am pleased to enclose feedback on your authority's eleventh Planning Performance Framework (PPF) Report, for the period April 2021 to March 2022.

The reporting period which these reports cover has continued to present challenges for people working within planning, in the development sector and across Scotland's communities.

Ensuring the system is appropriately resourced is key to improving the performance of planning, which is why in April I implemented the biggest change to planning fees in 8 years, with fees for most types of development increasing by between 25% and 50%. At the time I said I would expect to see this additional money invested in delivering improvements in Planning Services. It is too early to know whether that has occurred, however, I have heard positive feedback from some authorities who have managed to recruit or retain staff as a result of the additional income. I also committed to working with Heads of Planning and COSLA to identify how we could move planning fees closer to covering the full cost of their determination. That work is ongoing and I expect to receive some conclusions/recommendations early in the new year.

I am also encouraged to see the fees for applications made under the Electricity Act also increasing on 13th December and the voluntary contribution of 50% of the fee, for certain types of application, being passed to planning authorities being maintained.

However, I recognise that resourcing is about more than just money and having a pipeline of knowledgeable and skilled planners is essential to delivering on our ambitions set out in NPF4. This is why I supported the RTPI and Heads of Planning Scotland's Future Planners Project which looked at proposals to help increase the numbers of people entering the planning profession. We recognise the importance of delivering on this vision and the resourcing and skills challenges for planning authorities, which we are taking steps to address.

Work is also progressing on

- the introduction of mandatory training for elected members in the planning system;
- the implementation of statutory annual reports by planning authorities; and
- the appointment of a Planning Improvement Coordinator for Scotland.

Turning to the 2021-22 PPF reporting year, although, as expected, there have been some minor changes overall in the markings awarded, the figures indicate that performance has remained relatively stable. This is a testament to the hard work and flexibility of authorities during challenging times and I believe that overall, good progress continues to be made by Scotland's planning authorities.

If you would like to discuss any of the markings awarded below, please email chief.planner@gov.scot and a member of the team will be happy to discuss these with you.

TOM ARTHUR

CC: Jim Grant, Head of Development Services

PERFORMANCE MARKERS REPORT 2021-22

Name of planning authority:	**Moray Council**

The High Level Group on Performance agreed a set of performance markers. We have assessed your report against those markers to give an indication of priority areas for improvement action. The high level group will monitor and evaluate how the key markers have been reported and the value which they have added.

The Red, Amber, Green ratings are based on the evidence provided within the PPF reports. Where no information or insufficient evidence has been provided, a 'red' marking has been allocated.

No.	Performance Marker	RAG rating	Comments
1	**Decision-making**: continuous reduction of average timescales for all development categories [Q1 - Q4]	Green	**Major Applications** Your timescales of 15.1 weeks is faster than the previous year and is also faster than the Scottish average of 44.6 weeks. **RAG = Green** **Local (Non-Householder) Applications** Your timescales of 6.8 weeks is faster than last year and faster than the Scottish average of 13.5 weeks. **RAG = Green** **Householder Applications** Your timescales of 6.2 weeks is faster than the previous year and remains faster than the Scottish average of 8.7 weeks and the statutory timescale. **RAG = Green** **Overall RAG = Green**
2	**Processing agreements**: • offer to all prospective applicants for major development planning applications; and • availability publicised on website	Green	You encourage processing agreements to applicants. **RAG = Green** Processing agreement template and guidance is available through your website. **RAG = Green** **Overall RAG = Green**
3	**Early collaboration** with applicants and consultees • availability and promotion of pre-application discussions for all prospective applications; and • clear and proportionate requests for supporting information	Green	You provide a pre-application advice service which is promoted through the website with standard form, guidance and charges. **RAG = Green** Your case studies and stated processes demonstrate a commitment to keeping requests for supporting information proportionate and how they lead to improved applications **RAG = Green** **Overall RAG = Green**
4	**Legal agreements**: conclude (or reconsider) applications after resolving to grant permission reducing number of live applications more than 6 months after resolution to grant (from last reporting period)	Green	Your average timescales for determining applications with legal agreements is 3.5 weeks which is faster than last year and faster than the Scottish average of 33.2 weeks. It is clear that the processes you have in place are minimising delays in concluding legal agreements.
5	**Enforcement charter** updated / re-published within last 2 years	Green	Your enforcement charter was reviewed and republished on March 2022.

6	**Continuous improvement**: • progress ambitious and relevant service improvement commitments identified through PPF report	Green	You have completed 8 out of 13 service improvement commitments with a further 3 ongoing and rolled into next year. 2 commitments have not progressed. You have identified a range of commitments for the following year, with some carried on from this year.
7	**Local development plan** less than 5 years since adoption	Green	Your LDP was adopted in July 2020 and is within the 5-years of the current plan adoption.
8	**Development plan scheme** – next LDP: • project planned and expected to be delivered to planned timescale	Green	Development Plan Scheme was approved January 2022 which sets out indicative timescales for the new LDP process, Work has begun on the Evidence Report.
9 &10	**LDP Engagement:** • stakeholders including Elected Members, industry, agencies, the public and Scottish Government are engaged appropriately through all key stages of development plan preparation.	N/A	LDP is in the very early stages of preparations and therefore no evidence was provided regarding engagement with stakeholders.
11	**Policy Advice** • Production of relevant and up to date policy advice	Green	A design brief for Dallas Dhu, Forres has been produced. Your case study 7 also provides examples of additional policy guidance following on from the completion of Elgin Masterplan, undertaking a consultation on Town Centre Improvement Plans.
12	**Corporate working across services** to improve outputs and services for customer benefit (for example: protocols; joined-up services; single contact arrangements; joint pre-application advice)	Green	You have protocols in place with Cairngorms National Park, a Service level agreement with Aberdeenshire for Archaeology Advice and you provide a single point of contact for pre-application advice which involves all internal and external consultees.
13	**Sharing good practice, skills and knowledge** between authorities	Green	You participate in HOPS sub committees, peer review of PPF with neighbouring authorities, annual meetings/training with SEPA and SNH. You also hold liaison meetings and training on forestry and tree management.
14	**Stalled sites / legacy cases**: conclusion or withdrawal of old planning applications and reducing number of live applications more than one year old	Green	You have no legacy cases for the fourth year running.
15	**Developer contributions**: clear and proportionate expectations • set out in development plan (and/or emerging plan); and • in pre-application discussions	Green	You have adopted new supplementary guidance to support your new LDP. **RAG = Green** Expectations for developer contributions are clarified in your pre-application discussions. **RAG = Green** **Overall RAG = Green**

MORAY COUNCIL
Performance against Key Markers

	Marker	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22
1	Decision making timescales									
2	Processing agreements									
3	Early collaboration									
4	Legal agreements									
5	Enforcement charter									
6	Continuous improvement									
7	Local development plan									
8	Development plan scheme									
9 & 10	LDP Engagement	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A
11	Regular and proportionate advice to support applications									
12	Corporate working across services									
13	Sharing good practice, skills and knowledge									
14	Stalled sites/legacy cases									
15	Developer contributions									

Overall Markings (total numbers for red, amber and green)

2012-13	3	6	6
2013-14	2	5	6
2014-15	1	4	8
2015-16	1	3	9
2016-17	0	1	12
2017-18	0	1	14
2018-19	0	0	13
2019-20	0	0	13
2020-21	0	0	13
2021-22	0	0	13

Decision Making Timescales (weeks)

	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	*2021-22 Scottish Average*
Major Development	98.2	13.1	20.0	16.9	16.5	8.9	10.3	21.3	15.1	*44.6*
Local (Non-Householder) Development	13.5	8.5	7.5	7.2	6.6	6.5	6.5	7.1	6.8	*13.5*
Householder Development	7.1	5.8	6.3	5.7	5.3	5.3	5.7	6.7	6.2	*8.7*

REPORT TO: **PLANNING & REGULATORY SERVICES COMMITTEE ON 14 MARCH 2023**

SUBJECT: **MORAY WIND ENERGY LANDSCAPE SENSITIVITY STUDY**

BY: **DEPUTY CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND FINANCE)**

1. REASON FOR REPORT

1.1 The report asks the Committee to approve the Moray Wind Energy Landscape Sensitivity Study (LSS) 2023 as a material consideration for development management purposes and to withdraw the Moray Onshore Wind Energy (MOWE) Non-Statutory Guidance 2020 and the Moray Wind Energy Landscape Capacity Study (LCS) 2017.

1.2 This report is submitted to Committee in terms of Section III (E) (2) of the Council's Scheme of Administration relating to the review and preparation of Strategic and Local Plans.

2. RECOMMENDATION

2.1 It is recommended that the Committee agrees:

(i) to approve the Moray Wind Energy Landscape Sensitivity Study (LSS), as set out in Appendix 1;

(ii) to note that the LSS supersedes the Moray Onshore Wind Energy (MOWE) Non-Statutory Guidance 2020 and the Moray Wind Energy Landscape Capacity Study (LCS) 2017;

(iii) that the LSS will be used as a material consideration in the determination of planning applications and to inform responses to Section 36 consultations;

(iv) to note the steps proposed in Section 6 to consider and engage on the future potential for onshore wind energy in Moray;

(v) that further work is carried out to consider opportunities for large scale onshore wind farms within the Regional Spatial Strategy; and

(vi) to note Policy 11 *Energy* of National Planning Framework (NPF) 4 and agree that an economist is commissioned to consider and advise on how local economic benefits are maximised in future energy infrastructure proposals, including onshore wind.

3. BACKGROUND

3.1 The Scottish Parliament approved National Planning Framework (NPF) 4 on 11 January 2023 and it was adopted on 13 February 2023, formally becoming part of the Development Plan for Moray. Planning for the transition to net zero, NPF4 seeks to enable more renewable energy generation and for local development plans to maximise the opportunities for renewable energy. Policy 11 *Energy* is the main national policy consideration in determining renewable energy proposals. The policy seeks to encourage, promote and facilitate all forms of renewable energy development onshore and offshore.

3.2 Policy DP9 *Renewable Energy* of the Moray Local Development Plan (MLDP) 2020 is the main policy consideration in determining renewable energy proposals, including onshore wind. The policy is supported by the Moray Onshore Wind Energy (MOWE) Non-Statutory Guidance 2020 and the Moray Wind Energy Landscape Capacity Study (LCS) 2017 which are material considerations in the determination of planning applications relating to renewable energy proposals.

3.3 Together, NPF4 and the MLDP form the statutory development plan. NPF4 removes the requirement for a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms as a guide for developers and communities. There is no support within NPF4 policies for local spatial frameworks.

4. LANDSCAPE SENSITIVITY STUDIES

4.1 In April 2022, NatureScot published “Landscape Sensitivity Assessment Guidance”. As there are no local or regional targets in which to determine the ‘capacity’ for developments, the Guidance advocated the change of assessment from landscape capacity to one of ‘sensitivity’. NatureScot define landscape sensitivity as “a measure of the ability of a landscape to accommodate change arising from specified types of development or land management”. For comparison, landscape capacity is defined as “the degree to which a landscape is able to accommodate change without significant effects on its character”.

4.2 The role of a LSS is to help inform site selection for wind turbines and provide strategic information to assist in the assessment of relative landscape and visual sensitivity to certain forms of development proposals. The findings are strategic and indicative and are not a substitute for detailed Landscape and Visual Impact Assessments (LVIA).

4.3 As part of a pilot project testing the methodology of landscape sensitivity assessments set out in NatureScot’s guidance, Moray Council and

NatureScot commissioned the development of a Landscape Sensitivity Study for Moray, to replace the existing LCS. The LSS, as agreed with NatureScot, is provided as **APPENDIX 1** to the report.

5. PROPOSALS

5.1 As part of NatureScot's pilot to test the methodology for landscape sensitivity assessments, Moray Council commissioned Carol Anderson Landscape Associates to provide a revised update to the LCS 2017 in line with NatureScot's guidance and new terminology. Changes made to the landscape character classification by NatureScot in 2019 were taken into account and the cumulative baseline was updated to reflect consents for wind farm development in Moray and neighbouring authorities since 2017.

5.2 The LSS identifies constraints and opportunities within each Assessment Unit (previously known as Landscape Character Type) and sets out the sensitivity to different size of wind turbines, with a particular emphasis on larger turbines (over 100m high to blade tip). The sensitivity assessment relates to specific landscapes and any effect on immediately adjacent Assessment Units in isolation therefore it is important to take into account the experience and appreciation of the Moray landscape as a whole and consider the wider implications of the conclusions of the individual assessments.

5.3 Strategic landscape issues are set out in the LSS and the assessment concludes that there are very few upland areas remaining in Moray which do not accommodate wind farm developments. The uplands that are centred on Ben Rinnes (*Open Uplands with Steep Slopes* Assessment Unit) comprises a rare tract of less developed uplands with stronger wildness qualities as identified in SNH's 2014 Relative Wildness Map. The coast and wider seascape of the Moray Firth is another key landscape feature where the strong sense of naturalness associated with sections of the coast and the setting of historic settlements would be highly sensitive to most sizes of wind turbine.

5.4 In summary, the LSS concludes that all Assessment Units have a high sensitivity to wind turbines over 150m high. The pressure for wind farm development located towards the outer edges of upland landscapes and the demand for substantially larger turbines up to around 220m height has the potential to increase landscape and visual impact on surrounding, more sensitive landscapes. The large extent of operational and consented wind farm development already located within Moray's uplands limits opportunities for additional turbines to be accommodated whilst minimising effects on adjacent more sensitive landscapes.

5.5 The LSS sets out a landscape strategy which is summarised below:

- Protect landmark hills and their setting;
- Maintain the distinctive approaches to Moray;
- Maintain the rugged scenery and setting to more dramatic uplands in the Ben Rinnes area;

- Protect the special qualities of the coast and its associated historic settlements;
- Ensure that any further development of larger turbines is clearly associated with less sensitive upland landscapes;
- Protect the character and special qualities of the Special Landscape Areas; and
- Ongoing review of cumulative landscape and visual effects of multiple wind turbine developments.

5.6 If approved by the Committee, the LSS will replace the MOWE and LCS 2017 as a material consideration in the determination of planning applications relating to renewable energy proposals.

6. NEXT STEPS

6.1 Policy 11 of NPF4 is general in the nature of its wording and requires local development plans to maximise opportunities for renewable energy. The policy does not make any reference to LSSs, makes no differentiation between the sizes of turbines and removes the requirement for spatial frameworks. The MOWE has had very limited weight in Public Inquiries and is now considered to be at odds with national policy.

6.2 The new planning system however introduces opportunities at both strategic and local scale to influence the future of Moray. At the strategic scale, the Regional Spatial Strategy (RSS) provides an opportunity for the Council to engage views as part of the LDP engagement programme. Officers will seek opinions on how wind energy impacts (including cumulative) can be addressed and how can Moray maximise opportunities for renewable energy whilst safeguarding its quality environment. Other opportunities such as the expansion of Moray's woodland and ecological networks will also be explored.

6.3 At a local level, Local Place Plans (LPP) provide an opportunity for community constituted bodies to prepare a place-based plan which sets out proposals for development and use of land.

6.4 Policy 11 requires development proposals to maximise net economic impact, including local and community socio-economic benefits. Officers propose to commission economists to advise on how these benefits can be maximised. This will inform a future report on community benefit which will explore whether the current £5k per installed Megawatt, plus other local benefits, meet the terms of NPF4 or whether this requires to be reviewed. This will involve consideration of a more strategic approach, in addition to the current community benefit fund, to address Moray's economic challenges.

6.5 Officers are arranging workshops with Elected Members to inform and shape the RSS and new LDP.

7. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))

The Corporate Plan prioritises the need to maintain and promote Moray's landscape and biodiversity. The 10 Year Plan (LOIP) identifies the need for a growing, diverse and sustainable economy. The MLDP 2020 and the proposed LSS is an important aspect in the assessment and facilitation of renewable energy development, which protecting Moray's landscape.

(b) Policy and Legal

The MLDP brings together and helps deliver key aspects of Moray 2026 and other national and local plans, strategies and policies. NPF4 was adopted on 13 February 2023 and, along with the MLDP, forms the statutory development plan. NPF4 policies seek to encourage, promote and facilitate all forms of renewable energy development onshore and offshore and maximise economic benefits.

Guidance from NatureScot requires the existing LCS to be updated to reflect changes in the assessment of the landscape and visual aspects of onshore wind energy development.

(c) Financial implications

The LSS was funded by NatureScot as part of their pilot project to test the proposed methodology of LSSs. An update to the Moray LSS, following subsequent decisions on large-scale wind farm proposals, was met by existing Strategic Planning & Development budgets.

It is proposed that a Quick Quote process is used to commission an economist to undertake the work proposed in para 6.4 above. This is estimated to cost £15,000 which will be met from existing revenue budget.

(d) Risk Implications

None.

(e) Staffing Implications

Work on the LSS has been undertaken as part of the workload of Strategic Planning & Development.

(f) Property

None.

(g) Equalities/Socio Economic Impact

No Equality Impact Assessment is required for this report.

(h) Climate Change and Biodiversity Impacts

There are no climate change or biodiversity implications arising directly from this report. However, as part of embedding climate change principles within the planning process, there is an expectation for developments to maximise opportunities to generate renewable energy, minimise environmental impacts, promote biodiversity and be adaptive to the expected impacts of climate change.

NPF4 requires local development plans to maximise the opportunities for renewable energy and sets out policies on climate change and biodiversity which, along with the LSS and the MLDP 2020, would be used to consider future proposals. NPF4 is subject to a separate report on the agenda of this Committee.

(i) Consultations

The Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Head of Financial Services, the Legal Services Manager, the Development Management and Building Standards Manager, the Principal Climate Change Strategy Officer, the Equal Opportunities Officer and Lissa Rowan (Committee Services Officer) have been consulted and are in agreement with the contents of the report. Any comments received have been incorporated into the report.

8. CONCLUSION

8.1 The Committee is asked to approve the Moray Wind Energy Landscape Sensitivity Study as a material consideration in the determination of planning applications.

8.2 The report sets out the steps proposed to consider and engage on the future potential for onshore wind energy in Moray and to ensure that local economic benefits are maximised in future onshore wind energy proposals.

Author of Report: Darren Westmacott, Planning Officer (Strategic Planning & Development)

Background Papers:
Ref:

MORAY WIND ENERGY LANDSCAPE SENSITIVITY STUDY

Final Report

Carol Anderson Landscape Associates

February 2023

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1 INTRODUCTION

1.1 Policy context

The Scottish Government is committed to increasing the amount of electricity generated from renewable sources. Wind farms, including repowering, expanding and extending the life of existing wind farms, will be supported.

National Planning Framework 4 (NPF4) requires Local Development Plans to seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emissions sources by identifying a range of opportunities for energy development. NPF4 recognises the importance of design and mitigation of renewable energy proposals in minimising significant landscape and visual effects whilst accepting that such effects are to be expected from some forms of renewable energy generation.

1.2 The role of Landscape Sensitivity Studies

Landscape sensitivity studies are intended to inform strategic planning for wind energy and to provide information that can assist in the evaluation of specific development proposals. They are a tool to help guide development to the best locations. The findings of landscape sensitivity assessment are strategic and indicative and are not a substitute for detailed Landscape and Visual Impact Assessment (LVIA) undertaken for site and project specific development proposals.

1.3 The 2012 and 2017 Moray Wind Energy Landscape Capacity Studies

Moray Council commissioned a landscape capacity study for wind energy development in 2012. This study comprised an assessment of landscape and visual sensitivity of Landscape Character Types (LCTs) to different sizes of wind turbine. The 2012 Moray Wind Energy Landscape Capacity Study was replaced by an updated and revised assessment in 2017. This principally took account of the changing cumulative context, as more wind farm developments were constructed and consented in Moray and the surrounding area and considered sensitivity to larger wind turbines due to the changes in technology that had occurred since 2012. The 2017 study informed a review of the Council's Onshore Wind Energy Policy Guidance, providing supporting information to the spatial framework set out in the current Local Development Plan.

1.4 Background to the updated 2023 landscape sensitivity study

NatureScot have recently issued new guidance on landscape sensitivity assessment. This guidance advocates changing the term 'landscape capacity study' to 'landscape sensitivity study' and provides updated and detailed guidance on undertaking landscape sensitivity assessment.

This 2023 Moray Wind Energy Landscape Sensitivity Assessment Study has been commissioned to revise and update the 2017 capacity study. It follows the methodology set out in the 2022 NatureScot Landscape Sensitivity Assessment Guidance and additionally updates the cumulative baseline with regard to recent consents for wind farm developments in Moray and within the surrounding area. One of the principal differences between the 2017 Landscape Capacity Study and this updated study is the consideration of the value associated with landscapes when making judgements on sensitivity which is a requirement of the new guidance. Changes made to the landscape

character classification by NatureScot in 2019 have also been taken into account in this updated study.

Once adopted, this Landscape Sensitivity Study will inform detailed consideration of wind energy development in the same way as the Landscape Capacity Study referenced in Policy DP9 within the Moray Local Development Plan 2020.

1.5 Study Objectives

The objectives of the study are to assess the sensitivity of landscapes within Moray to different scales of wind turbine development. The study also considers potential cumulative and cross-boundary landscape and visual effects (considering neighbouring local authorities) and identifies broad constraints and opportunities for new wind energy developments, including extensions to, and repowering of, operational wind farms. The sensitivity assessment principally focusses on commercial scales of wind turbines but also considers sensitivity to smaller wind turbines in detail in more settled lowland landscapes. Some general guidance is given on the siting of smaller wind turbines in sparsely settled upland areas where demand for this type of development is likely to be low.

The study has additionally provided feedback on the methodology outlined in draft versions of the recently published NatureScot Landscape Sensitivity Assessment Guidance in tandem with a Pilot Landscape Sensitivity Study undertaken for the Dava Moor, Nairn and Monadhliath study area in Highland Council area.

1.6 Structure of the report

Section two of the report, which follows this introduction, describes the methodology adopted for the assessment, the Assessment Units which form the basis of the study and the types of wind turbine which have been assessed. Operational and consented wind farm and turbine developments which form the baseline for the study are also identified.

Landscape and visual sensitivity assessments have been produced for 14 Assessment Units within Moray and these are set out in subsequent sections of the report. These assessments consider the susceptibility of each of the Assessment Units to different sizes of wind turbine, together with the landscape value associated with the Assessment Unit, in making judgements on landscape sensitivity. Guidance is provided on cumulative issues, opportunities and constraints for development and on the general siting of development within each Assessment Unit. A summary of the findings and a proposed landscape strategy for accommodating additional wind energy development in Moray is set out in Section 18 of the report.

1.7 How to use the study

The study aims to support strategic spatial planning for wind energy development. It considers broad landscape and visual sensitivities only and a range of other factors also need to be considered in determining the acceptability of specific developments. The assessment identifies constraints and opportunities at a strategic scale and Landscape and Visual Impact Assessment (LVIA) will provide more detailed assessment of specific wind energy developments.

The sensitivity assessments have been undertaken on the basis of Assessment Units which are closely allied to Landscape Character Types. These often have ‘fluid’ boundaries with a gradual transition occurring with similar adjacent Assessment Units. Wind turbines are also tall structures likely to have an influence on adjoining landscapes. It is therefore recommended that when considering individual proposals, both the Assessment Unit that the development lies in, and immediately adjoining Assessment Units, are reviewed as wider sensitivities may apply. This should include consideration of cross-boundary landscape and visual issues with where relevant.

The study considers the sensitivity of Assessment Units to a limited number of pre-determined turbine types, principally based on height. Individual applications need to be considered on a case-by-case basis with some flexibility on turbine heights being applied within close range of the upper height threshold used in the sensitivity assessment. Where turbines are slightly above the height threshold or proposed within more sensitive landscapes, they should be subject to careful and thorough consideration with the developer being requested to demonstrate how they have dealt with potential effects on the constraints identified in the sensitivity assessment at a more detailed level.

2 STUDY METHODOLOGY

2.1 Introduction

The study considers the sensitivity of different landscapes within Moray to changes that would be brought about by additional wind turbine development as well as repowering of operational wind turbines. Although the focus is on landscapes within Moray, landscape and visual sensitivities and potential cumulative issues associated with adjoining authorities are also considered. Moray and adjoining authorities are shown in Figure 1.

2.2 Guidance on landscape sensitivity assessment

This study is based on the guidance contained in NatureScot's 2022 *Landscape Sensitivity Assessment Guidance*. The guidance defines landscape sensitivity assessments as strategic appraisals of the relative sensitivity of landscapes to development or land use changes. Landscape sensitivity is described as being '*a measure of the ability of a landscape to accommodate change arising from specified development types or land management scenarios without undue negative effects on the landscape and visual baseline and their value'.*

Landscape sensitivity assessment is undertaken on the basis of Assessment Units which are based on the Landscape Character Types identified in the NatureScot 2019 online national classification. The susceptibility of key landscape and visual criteria and the value associated with the landscape are considered in making judgements on sensitivity. Landscape sensitivity assessment considers the principle of a particular type of change rather than a specific development in a defined location.

2.3 Definition of terms

The following definitions of terms apply to this study:

Landscape character assessment is the starting point for landscape sensitivity work. It identifies and explains the combination of elements and features that make landscapes distinct from one another by mapping and describing Landscape Character Types (LCT) that are generic and Landscape Character Areas that are place specific. The description of their distinctive characteristics often includes how the landscape is perceived and experienced by people. Landscape Character Assessment analyses in detail the three main physical landscape components of landform, land cover and settlement and how they combine to form the landscapes we see and experience. The LCTs defined in the national coverage of Landscape Character Assessment form the basis for the Assessment Units used in the landscape sensitivity assessment. While the Assessment Units are similar to the LCTs, there are more detailed sub-divisions and different names are also used in some instances as indicated in Table 2.

Landscape susceptibility, within the context of sensitivity studies, can be defined as '*the degree to which a defined landscape and its associated visual qualities and attributes might respond to the specific development type/development scenario or other change without undue negative effects on landscape character and the visual*

resource' [1]. In this study, change relates to wind energy development and any findings on landscape sensitivity are restricted to this. Landscapes may have different susceptibilities to other forms of change or development.

Landscape value
This is a measure of the relative value attached to different landscapes by society. It includes nationally and locally important designated landscapes and other formally recognised landscape interests as well as other aspects of the landscape which may be valued by a variety of stakeholders for a range of reasons such as recreation, tourism or cultural interest.

Landscape sensitivity is a measure of the ability of a landscape to accommodate change arising from specified development types or land management. It combines judgements of the susceptibility of the landscape to change and the values attached to the landscape. Sensitivity assessments or studies provide an indication of this in a manner which is robust, repeatable and capable of standing up to scrutiny.

2.4 General approach to the study

The approach to the study has been informed by guidance on the potential impacts and landscape sensitivities associated with wind energy development and on the practical application of methodologies used in recent landscape sensitivity studies we have undertaken. The study has involved the following key tasks:

- Identification of operational and consented wind farm and turbine developments in Moray and within adjoining authorities to inform the baseline for this study.
- Identification of the different wind turbine development types to be assessed in the study in collaboration with the Steering Group which comprised representatives of The Moray Council and NatureScot.
- Definition of the landscape and visual susceptibility criteria to be used in the assessment and the scope of aspects to consider in determining the value associated with the landscape.
- Field work to define appropriate Assessment Units which will form the basis of the study and to assess their sensitivity to the agreed development types and considering cumulative effects with operational and consented wind energy developments.
- An overview of landscape and visual sensitivity across the study area and recommendations on strategic landscape and visual considerations for wind energy developments within and close to Moray.

2.5 Operational and consented wind farms and turbines

The operational and consented wind farm developments lying in Moray and close to its boundaries set out in Table 1 below form the baseline for the sensitivity assessment. These developments are shown in Figure 2. Proposed wind farm developments are not considered in the sensitivity assessment.

[1] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment 3rd Edition*.

Table 1: Operational and consented wind farms considered in the study

Windfarm	***Turbines***	***Height to blade tip***	***Assessment Units***
Operational wind farms and turbines > 50m high			
Rothes	28	100m	*Upland Moorland and Forestry*
Paul's Hill	28	100m	*Open Rolling Uplands*
Hill of Towie	21	100m	*Rolling Forested Hills*
Berry Burn	29	104m	*Open Rolling Uplands*
Rothes II	18	125m	*Upland Moorland and Forestry*
Myreton, Keith	3	80/89m	*Upland Farmland*
Balnamoon, Keith	1	70m	*Upland Farmland*
Netherton of Windyhills	2	92m	*Upland Farmland*
Clashindarroch	18	110m	*(Aberdeenshire)*
Kildrummy	8	93m	*(Aberdeenshire)*
Hill of Glaschyle	12	99.5m	*Upland Moorland and Forestry*
Dorenell	59	126m	*Open Uplands with Settled Glens*
Edintore	6	125m	*Upland Farmland*
Cluny Farm, Forres	1	61m	*Rolling Farmland and Forests*
Ardoch Farm, Mulben	1	67m	*Broad Farmed Valley*
Bognie Farm	1	61m	*Rolling Farmland and Forests*
Consented wind farms and turbines >50m high			
Hunthill, Rothes	3	67m	*Upland Moorland and Forestry*
Aultmore	13	110/100m	*Low Forested Hills*
Kellas	4	100m	*Upland Moorland and Forestry*
Meikle Hill	6	125m	*Upland Moorland and Forestry*
Cairn Duhie	20	110m	*Open Rolling Upland (Highland)*
Hill of Towie II	16	125m	*Rolling Forested Hills*
Lurg Hill	5	130m	*Low Forested Hills*
Paul's Hill II	6	134/149m	*Open Rolling Upland*
Berry Burn II	9	149.9m	*Open Rolling Upland*
Garbet	7	190m	*Open Uplands with Settled Glens*
Clash Gour	48	130/180m	*Open Rolling Upland*
Rothes III	28	149.9/225m	*Upland Moorland and Forestry*

Smaller wind turbine developments

There are a number of operational single and small groups of turbines below 50m high in Moray. These are largely located within the *Upland Farmland*, *Broad Farmed Valley* and *Coastal Farmland* Assessment Units.

2.6 Baseline landscape character

The Assessment Units considered in the sensitivity assessment are shown in Figure 3. Table 2 shows the correlation between the NatureScot national landscape character classification and the Assessment Units considered in the study.

Table 2: Correlation with NatureScot 2019 landscape character classification

NatureScot Landscape Character Types	Assessment Units considered in this study
Beaches, Dunes and Links (281)	Coastal Margin (1)
Cliffs and Rocky Coast (282)	
Coastal Forest (283)	
Coastal Farmland (284)	Coastal Farmland (2)
	Rolling Coastal Farmland (3)
Rolling Farmland and Forest (285)	Rolling Farmland and Forest (4)
Narrow Wooded Valley (286)	Narrow Wooded Valley (5)
Broad Farmed Valley (287)	Broad Farmed Valley (6)
Farmed and Wooded River Valleys (32)	Narrow Farmed Valley (7)
Upland Valley (294)	
Upland Farmland (288)	Upland Farmland (8)
Upland Farmed Valleys (289)	
Low Forested Hills (293)	Low Forested Hills (9)
Upland Moorland and Forestry (290)	Upland Moorland and Forestry (10)
Open Rolling Upland (291)	Open Rolling Upland (11)
Open Uplands (292)	Rolling Forested Hills (12)
	Open Uplands with Steep Slopes (13)
	Open Uplands with Settled Glens (14)

2.7 Wind turbine types

2.7.1 *Smaller types*

The focus of this study is on new ‘commercial’ wind farm developments and extensions to operational wind farms rather than smaller turbines <100m high which are no longer considered economic by the renewables industry. Smaller turbines <100m are principally considered in more settled lowland areas as these are the areas where there has been interest in single and small groups of turbines of this size in the past. Whilst manufacture of turbines <100m may have slowed, older, smaller turbines within operational wind farms may be available for re-use in the future.

2.7.2 *Larger types*

The majority of operational wind turbines in Moray are between 100-126m high to blade tip. Recent consents include turbines of 130m and 149m high. The trend is for turbines to increase in size with recent applications comprising turbines up to 225m high. We have considered two sizes within the larger turbine category, 100-150m high and >150m high (to a possible upper height of 250m). The 150m height threshold has been principally determined because of the requirement for visible aviation lighting on turbines 150m and over and the potential landscape and visual effects of this.

We have not specifically considered pre-determined numbers of turbines within the typologies assessed as this would make the sensitivity assessment complex and difficult to follow. Some broad indication is given, however, of the likely extent of

development that may be accommodated within the guidance set out for each Assessment Unit.

2.7.3 *Development types considered in the study*

The study considers the following turbine types:

- Small turbines 35-50m
- Medium turbines 50-100m
- Large turbines 100-150m
- Very Large turbines >150m (up to around 250m)

The 'Small' turbine turbine type considers turbines between 35m and 50m high. Turbines <35m high generally have fewer landscape and visual effects and these are therefore not considered in the detailed sensitivity tables in Appendix C. Some general guidance on accommodating this size of turbine in more settled lowland landscapes is however provided in the summary assessment.

Not all turbine types are considered in all Assessment Units. A broad scoping exercise was undertaken to focus on the key Assessment Units where there is/or may be interest in commercial scale developments because of sparse settlement and the generally more extensive scale of the landscape. This exercise principally considers the key susceptibility criteria of landform, landcover and scale and is included in Appendix B.

2.7.4 *Aviation lighting*

All onshore wind turbines 150m high and over to blade tip require visible red aviation warning lighting under Civil Aviation Authority (CAA) rules. These generally comprise 2000 candela lights fixed to the top of the nacelle which can be dimmed to 200 candela in clear visibility. Shielding of the light can help reduce the intensity of lighting experienced in closer lower-level views. Further mitigation of lighting is currently being considered for many wind farms in the planning system. This includes measures to reduce the number of turbines within a wind farm proposal which need to be lit. Aircraft Detection Lighting Systems where the lights are only activated when an aircraft approaches, are also currently being considered by developers with the CAA. These systems may significantly reduce the duration of lighting.

2.8 The sensitivity assessment

The study considers the susceptibility of key landscape and visual characteristics (named assessment criteria) of different Assessment Units within the study area to the turbine types outlined above. The value associated with the Assessment Unit is also considered with susceptibility and value being combined to arrive at a sensitivity rating for each of the turbine types considered in the assessment. Table 3 below sets out the landscape and visual sensitivity criteria considered in the sensitivity assessment.

Table 3: Landscape susceptibility and value assessment criteria

Assessment criteria	***Factors considered in the assessment***
Scale	Consideration of the scale of the landscape based on the degree of topographical relief, openness and enclosure and the presence of smaller scale features. In general, larger scale landscapes are likely to be less susceptible to larger wind turbines.
Landform	Consideration of the degree of complexity of landform including identification of any distinct topographical features. Assessment of how development, including ancillary works such as access tracks and energy storage infrastructure, could impact on or relate to landform. Simpler and more gently graded landform would generally be less susceptible while more complex, steeper and distinctive landform would be more susceptible.
Land cover	Consideration of the degree of complexity and diversity of land cover including field enclosure pattern, woodlands, water courses and lochs but also distinctive landcover features. More diverse and intricate landcover pattern would be more susceptible to development in general with broader, simpler landcover pattern being less susceptible. Effects include loss of the feature and diminishment of the integrity if removed to accommodate turbines or a detractive effect if turbine were located nearby.
Built environment	Consideration of the pattern, density and character of settlement and other built features, including prominent cultural heritage features, their relationship to topography or other natural features and their setting. Assessment of how development might impinge on these features and where there may be scope to attain some visual separation to minimise effects. Where larger scale buildings and built structures such as pylons, masts and operational and consented wind farms are present, the relationship of additional turbine development to these is assessed.
Landscape context	The role of adjacent Assessment Units in contributing to the character of the Assessment Unit which is the subject of the assessment and vice versa. The degree of inter-visibility and effects on key characteristics are assessed. Smaller Assessment Units that are more closely juxtaposed and contrast strongly with surrounding landscapes are likely to be of increased susceptibility while Assessment Units which are large in extent, or which have a similarly large scale and simple landcover pattern to neighbouring landscapes, may be less susceptible.
Visual aspects	The extent of relative visibility of the landscape (including considerations of whether it is well-settled and easily accessible) and key views to and from the landscape. The degree of openness or enclosure which influences visibility, including the amount of screening created by topography and woodland. The type of views, including elevated, extensive views which are sustained or more intermittent views where woodland or landform provides some screening. Appraisal of the significance of skylines and key vistas including the presence of landmark features. More densely settled and open landscapes would generally be of increased susceptibility although the presence of key visitor

	attractions and routes (including areas popular for recreation) can increase susceptibility in more sparsely settled landscapes. Susceptibility is also generally reduced if landform and woodland have the potential to provide screening. Prominent skylines and views to landmark natural or built features are of increased susceptibility.
Landscape Values	Presence of designated landscapes, which in the study area comprise Special Landscape Areas (SLAs), Conservation Areas and Inventory listed Gardens and Designed Landscapes (GDL). The presence of indicators of related interests such as promoted viewpoints and recreational/tourist routes will also be considered. Designations or values that reinforce landscape features, for example Sites of Special Scientific Interest (SSSI) for landform or landcover features are also taken into account. Judgements are made on the contribution to landscape value taking into account the nature, importance, extent and number of designations and recognised interests. Valued landscapes which abut the study area, including SLAs in Moray and Highland and the Cairngorms National Park, are additionally considered. Where citations exist for designated and other formally valued landscapes, the effect of development on identified key characteristics and qualities of these areas is appraised

2.9 Judgements on overall sensitivity

The overall sensitivity level is judged by considering the combined weight of evidence on landscape and visual susceptibility and value rather than using a numerical scoring system. The score attributed to landscape value comprises one of the eight landscape and visual sensitivity criteria (an eighth of the score) when judging overall sensitivity rather than contributing half of the score. A five-point scale has been used in the assessment of each susceptibility criterion and with regard to the value associated with the Assessment Unit. This is also adopted in the overall sensitivity ratings accorded to each Assessment Unit as interpreted in Table 4 below.

The overall sensitivity rating does not represent a median score across all criteria but rather considers the degree of susceptibility of each criterion to a development type and the nature of likely effects on valued landscapes. In general, an Assessment Unit which has been judged in the assessment to have a high susceptibility across three or more criteria would be considered to have a high overall sensitivity rating. A similar approach has been adopted for high-medium susceptibility across three or more criteria.

Table 4: Explanation of overall sensitivity ratings

Overall Sensitivity rating	**Definition**
High	Key assessment criteria, such as scale, landform and visual aspects, are highly vulnerable to change from the development type. Development would conflict with several or most of the assessment criteria with

	widespread and severe adverse impacts likely to arise.
High-medium	Assessment criteria are vulnerable to change from the development type. Development would conflict with some of the assessment criteria but may be able to be accommodated in very small parts of some Assessment Units.
Medium	Assessment criteria are generally less vulnerable to change from the development type. There is some ability to accommodate development in some situations without widespread or severe changes to the landscape; the development turbine type relates to key aspects of landscape character.
Medium-low	Fewer of the assessment criteria are vulnerable to change from the development type. There are opportunities to accommodate the development turbine type in most locations without widespread or severe effects on the assessment criteria; the development turbine type relates to many aspects of landscape character.
Low	Assessment criteria are generally not vulnerable to change. The development turbine type relates well to the assessment criteria and change may be accommodated without widespread significant adverse impacts on the landscape.

2.10 Cumulative effects with existing wind energy development

There are two outputs from the assessments in relation to cumulative landscape and visual assessment.

2.10.1 *Cumulative effects*

We have firstly considered cumulative effects with other large infrastructure, including operational and consented wind farms, in the sensitivity assessments under the assessment criterion of 'built environment'.

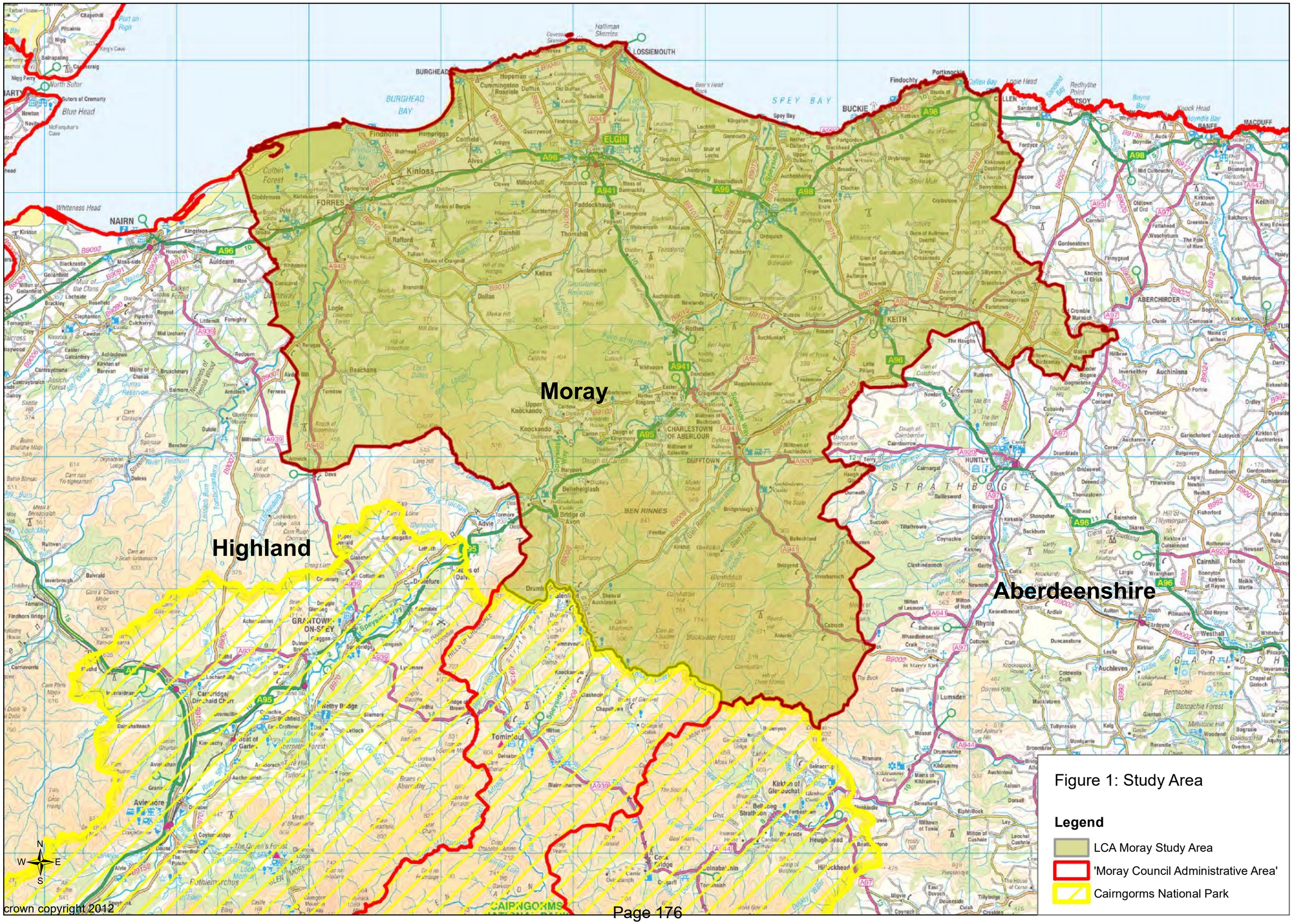
2.10.2 *Potential cumulative issues*

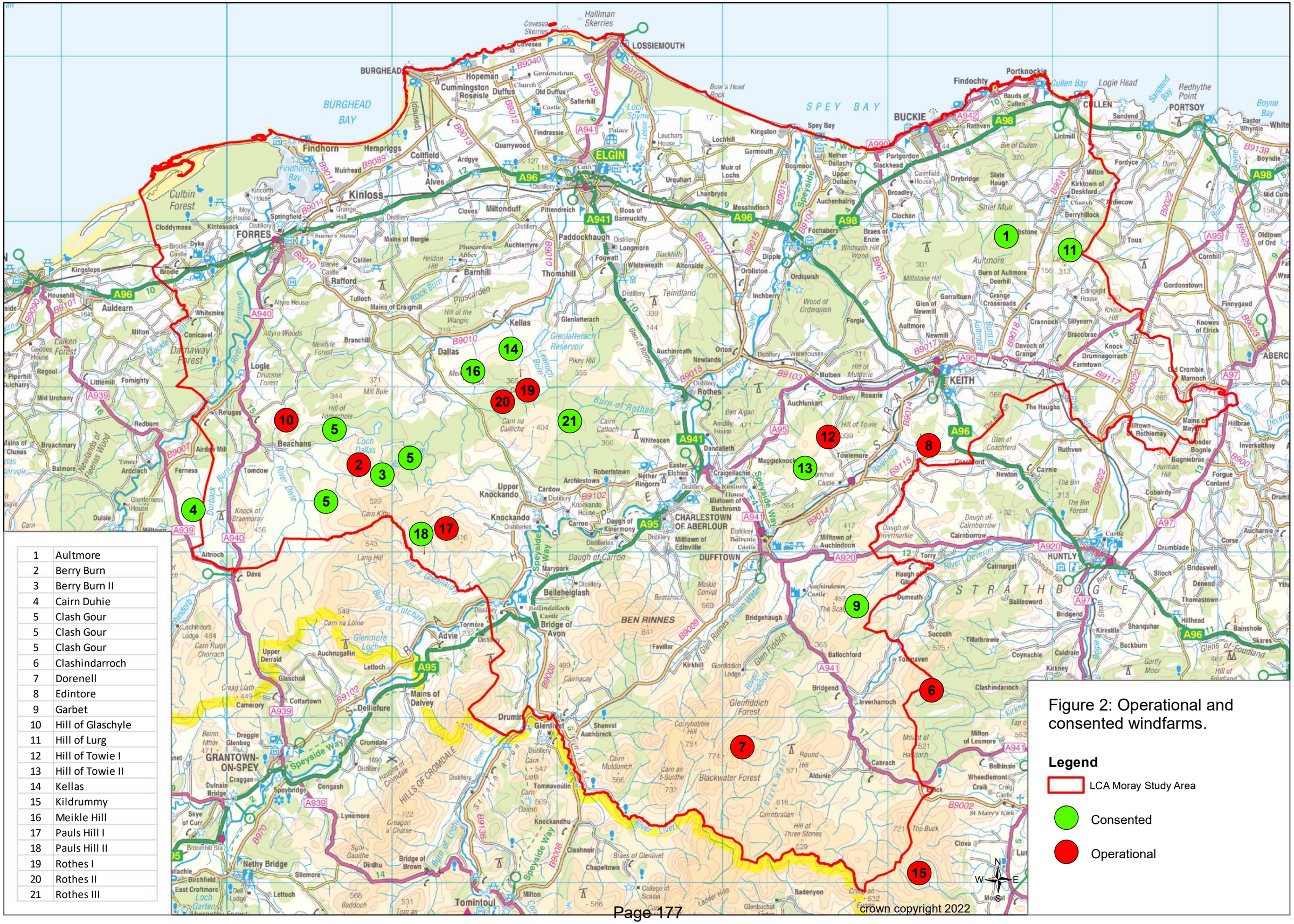
We have also identified potential cumulative landscape and visual issues in the summary text. These are more speculative potential impacts and reflect what might happen depending on the number and type of developments which could be introduced into the Assessment Unit which is the subject of the assessment. Potential landscape and visual cumulative impacts considered include:

- Change in landscape character – i.e. where an addition to existing and consented wind farms and turbines is likely to result in wind turbines becoming a recognisable and consistent characteristic associated with a specific Assessment Unit, rather than a one off feature;
- Significant alteration to a defining characteristic of that landscape character – i.e. a characteristic which is recognised as contributing to the distinctive identity

of the character of an area is likely to be lost or significantly diminished by the addition of one or more wind farms or multiple wind turbines to multiple existing and consented wind farms or turbines;

- Loss of recognisable development pattern – i.e where wind farms or turbines are introduced into a landscape where existing wind farms or turbines already create a recognisable pattern of development which relates strongly to particular landscape characteristics but additional development diminishes the integrity and robustness of the pattern leading to fragmentation of landscape character
- Visual dominance – i.e where wind farms or turbines become a visually dominant feature because of their combined presence as multiple or merged developments affecting a skyline as viewed from a significant viewpoint, or encountered sequentially as a series of focal points from a road or stretch of coast which is a definable journey
- Visual clutter – where different types of turbines, including different heights and styles of design, come together to create a muddled visual distraction from the landscape or key features.





1	Aultmore
2	Berry Burn
3	Berry Burn II
4	Cairn Duhie
5	Clash Gour
5	Clash Gour
5	Clash Gour
6	Clashindarroch
7	Dorenell
8	Edintore
9	Garbet
10	Hill of Glaschyle
11	Hill of Lurg
12	Hill of Towie I
13	Hill of Towie II
14	Kellas
15	Kildrummy
16	Meikle Hill
17	Pauls Hill I
18	Pauls Hill II
19	Rothes I
20	Rothes II
21	Rothes III

Figure 2: Operational and consented windfarms.

Legend

- LCA Moray Study Area
- Consented
- Operational

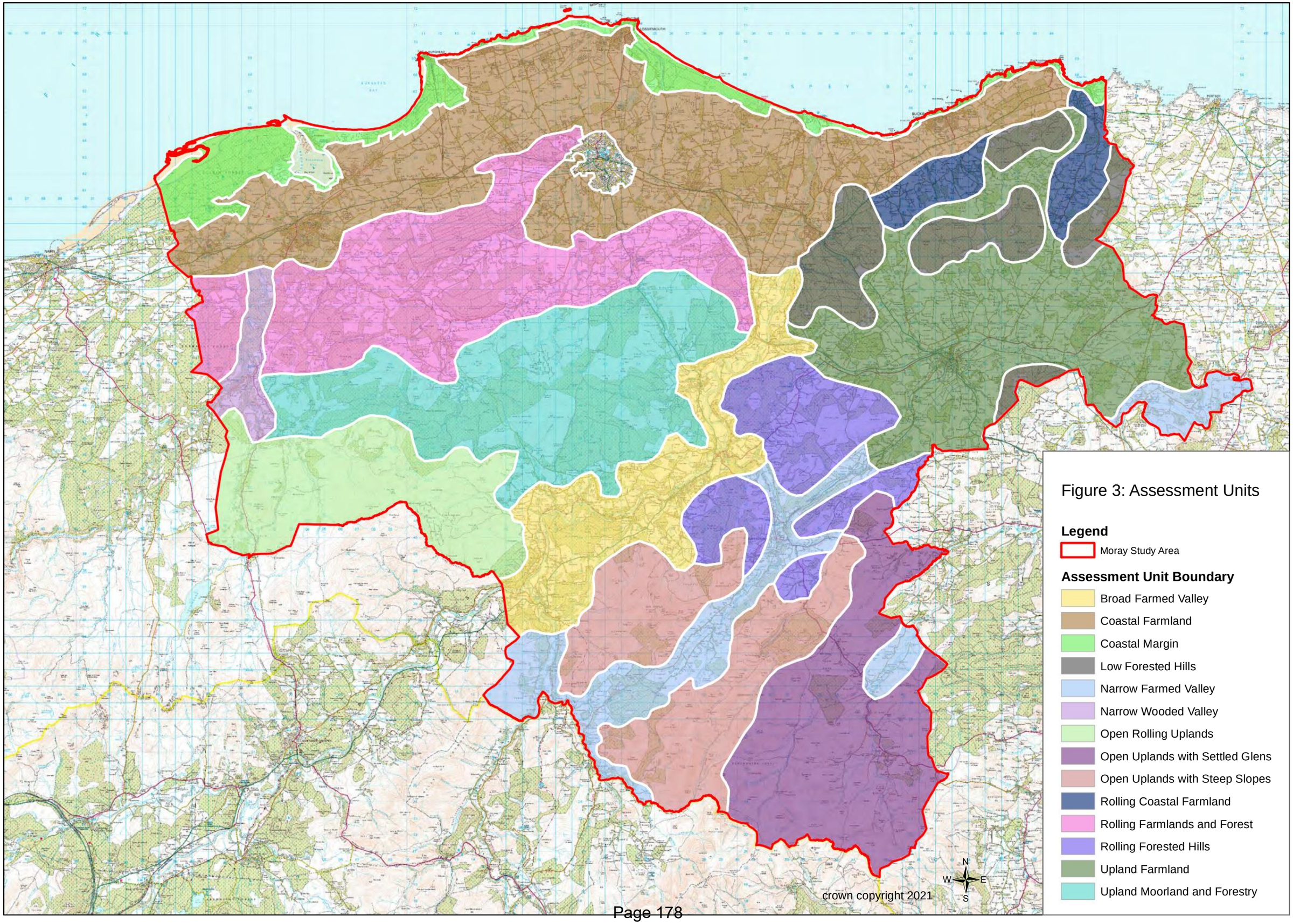


Figure 3: Assessment Units
Legend
Moray Study Area
Assessment Unit Boundary
Broad Farmed Valley
Coastal Farmland
Coastal Margin
Low Forested Hills
Narrow Farmed Valley
Narrow Wooded Valley
Open Rolling Uplands
Open Uplands with Settled Glens
Open Uplands with Steep Slopes
Rolling Coastal Farmland
Rolling Farmlands and Forest
Rolling Forested Hills
Upland Farmland
Upland Moorland and Forestry
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3 INTRODUCTION TO THE SENSITIVITY ASSESSMENT

The following sections of the report contain a summary of the sensitivity assessment undertaken for each Assessment Unit considered in the study. An introduction describes the location of the Assessment Unit and outlines operational and consented wind energy developments located in the Assessment Unit and surrounding area (and clearly visible from the Assessment Unit being assessed). Constraints and opportunities for wind energy development are listed and guidance is given on general siting and design. Detailed sensitivity assessment tables for each Assessment Unit are included in Appendix C to this report.

Table 5 indicates the turbine types considered in each of the Assessment Units in the detailed sensitivity assessment (see also the exercise undertaken to determine the scope of the detailed sensitivity assessment in Appendix B).

Table 5: Turbine types considered in the detailed sensitivity assessment

Assessment Unit	**Turbines 35-50m**	**Turbines 50-100m**	**Turbines 100-150m**	**Turbines 150-250m**
Coastal Margin	√	√	x	x
Coastal Farmland	√	√	√	x
Rolling Coastal Farmland	√	√	√	x
Rolling Farmland and Forest	√	√	√	x
Narrow Wooded Valley	√	√	x	x
Broad Farmed Valley	√	√	√	x
Narrow Farmed Valleys	√	√	x	x
Upland Farmland	√	√	√	x
Low Forested Hills	x	x	√	√
Rolling Forested Hills	x	x	√	√
Upland Moorland and Forestry	x	x	√	√
Open Rolling Uplands	x	x	√	√
Open Upland with Steep Slopes	x	x	√	√
Open Upland with Settled Glens	x	x	√	√

The study has focussed on assessing the relationship between the size of the turbine and the landscape and visual sensitivity criteria. In undertaking this analysis, single turbines and groups of turbines have been considered and the assessment also considers scope for multiple developments. The availability of less constrained land, considering the extent of area already occupied by operational and consented wind farms and the potential effects on key landscape and visual constraints, has informed the judgments made on sensitivity.

Although not considered in detailed in the sensitivity assessment, some general guidance is given on siting of turbines <100m high in sparsely settled upland areas. Guidance is also provided on siting turbines <35m in more settled Assessment Units.

4 COASTAL MARGIN (1)

4.1 Introduction

The *Coastal Margin* Assessment Unit combines the *Beaches, Dunes and Links,* the *Cliffs and Rocky Coast* and *Coastal Forest* LCTs defined in the 2019 NatureScot landscape character classification.

4.1.1 *Operational/consented wind farms*

Three operational wind turbines <50m are located at the transition of this Assessment Unit with the *Coastal Farmland* and are visible from parts of the beach at Findhorn. Views to operational wind farms located within the uplands of Moray are limited from many parts of the *Coastal Margin* due to the screening provided by landform and forest. More open, but distant, views are possible to the operational Rothes I and II, the Berry Burn and Hill of Glaschyle wind farms from Findhorn Bay and intermittently from the Lossiemouth area. The consented Clash Gour wind farm is also likely to be visible from these parts of the Assessment Unit. The operational Hill of Towie wind farm is visible from the Spey Bay area and the consented Aultmore wind farm will be visible from the eastern part of this Assessment Unit. The majority of operational and consented wind farms are sited at least 15km from the coast which limits their landscape and visual influence.

4.2 Summary description and assessment

This landscape generally comprises a narrow coastal band, widening to the west where it includes Findhorn Bay and the coastal forests of Culbin and Lossie. The coast has a natural, complex and dynamic character in the west with sand bars, curving shingle spits, extensive dune systems, basins and marshy estuaries. A small scale rocky coastal edge of coves and promontories is interspersed east of Burghead with longer even stretches of sandy beach while to the east a narrow, raised beach is strongly contained by low sandstone cliffs. Extensive forests back the coast in places and although these largely comprise managed pine, a mosaic of glades, underlying dunes and older plantings support a richly diverse ecology particularly evident within Culbin - Forest. This coast features a distinctive pattern of small, historically rich settlements including Findhorn, Cullen, Findochty, Burghead, Kingston and Lossiemouth. There are few buildings between settlements and an absence of roads along much of the coast.

Views are expansive across the Moray Firth and focus on the distant Sutherland hills while views inland are often restricted by dunes and raised beach landforms and forest. The coast is open and exposed and a sense of isolation can be experienced away from settlements and roads.

This coastal landscape is largely covered by a series of adjoining SLA designations. The value associated with the coast (reflected in the SLA designation) also rests on widespread nature conservation designations, cultural heritage interests and the importance of the coast for recreation and tourism.

4.2.1 *Potential cumulative issues*

Operational wind farm developments sited within the uplands of Moray do not have a significant effect on character or on views from the *Coastal Margin*. Consented wind farm developments are also likely to be sited sufficiently far away to limit intrusion. The three operational wind turbines at Findhorn have a localised effect on coastal character and views. Key cumulative issues that may arise within the *Coastal Margin* are likely to include:

- Multiple wind turbines sited within both the *Coastal Margin* and the *Coastal Farmland* Assessment Units which would be inter-visible where the landscape is more open and could form dominant features particularly if concentrated in close proximity to each other.
- Variations in the type and size of single and small groups of small turbines proposed within the *Coastal Margin* and also cumulative effects with masts and other tall structures sited close to the coast which could adversely affect the sense of naturalness and seclusion associated with much of this landscape.
- Sequential visual impacts experienced when travelling on coast roads or on coastal paths.

4.2.2 *Constraints*

- The narrowness of the open coastal edge which limits scope for multiple and large turbines to be physically accommodated.
- The small scale of more complex indented rocky coastline and narrow raised beaches contained by low cliffs which would be dominated even by smaller wind turbines.
- The rich diversity of natural coastal features including raised beaches, rocky coves and promontories, extensive dune systems, sand bars and spits, basins and estuaries.
- The relatively unmodified coastal edge, which although well-used for recreation, has a strong sense of naturalness and can seem secluded away from settlement, especially when backed by the coastal forests.
- Distinctive historic settlements sited along the coast and their immediate coastal setting.
- The attraction of the coast for recreation and tourism increasing sensitivity to wind turbines which would be seen from beaches, vantage viewpoints within forests, roads and settlements.
- Views from the open hinterland of the *Coastal Farmland* but also from the more distant north-facing settled hill slopes of the *Rolling Farmland and Forest* and the *Coastal Farmland with Rolling Hills* AUs where larger wind turbines would be particularly prominent and could intrude on views to the Moray Firth.
- The landmark hill of the Bin of Cullen and the policies of Cullen House in the east of Moray where wind turbines could detract on the setting of these features.
- The SLA designation which covers much of this Assessment Unit and which increases the value of this coastal landscape.

4.2.3 *Opportunities*

- Broader areas of farmland with a simple landform and land cover pattern at the transition with the *Coastal Farmland* in the western parts of this Assessment Unit where smaller turbines could be set sufficiently well back from the more sensitive beaches and dunes and could benefit from screening by the coastal woodlands.

4.3 Sensitivity and guidance

This coastal landscape is of **high** sensitivity to turbines >50m high. This is principally because of its rich scenic diversity, the setting it provides to distinctive historic coastal settlements, its popularity for recreation and tourism and the sense of naturalness and seclusion that can be experienced along less settled sections of the coast. These qualities are recognised in the SLA designation which covers much of this Assessment Unit.

Landscape sensitivity to turbines 35-50m would be **High-medium** as even these smaller turbines would be likely to detract from the diverse character of the coast, impact on views and diminish the sense of naturalness and seclusion that can be experienced.

4.3.1 *Opportunities for smaller turbines <35m high*

Areas set well back from the coastal edge on the inland fringes of the coastal forests, where some screening could be provided in views from the coast, would be less sensitive to smaller turbines and particularly turbines <25m high. Turbines should not be located in more isolated and unmodified coastal areas with strongly perceived qualities of wildness and should be sited away from more complex small scale or diverse coastal features. Ridge tops, promontories, dunes and cliff edges above raised beach platforms should be avoided and care should be taken to avoid intrusion on the coastal setting of historic settlements.

Detailed siting and design should accord with the guidance set out for smaller wind turbines in Appendix D.

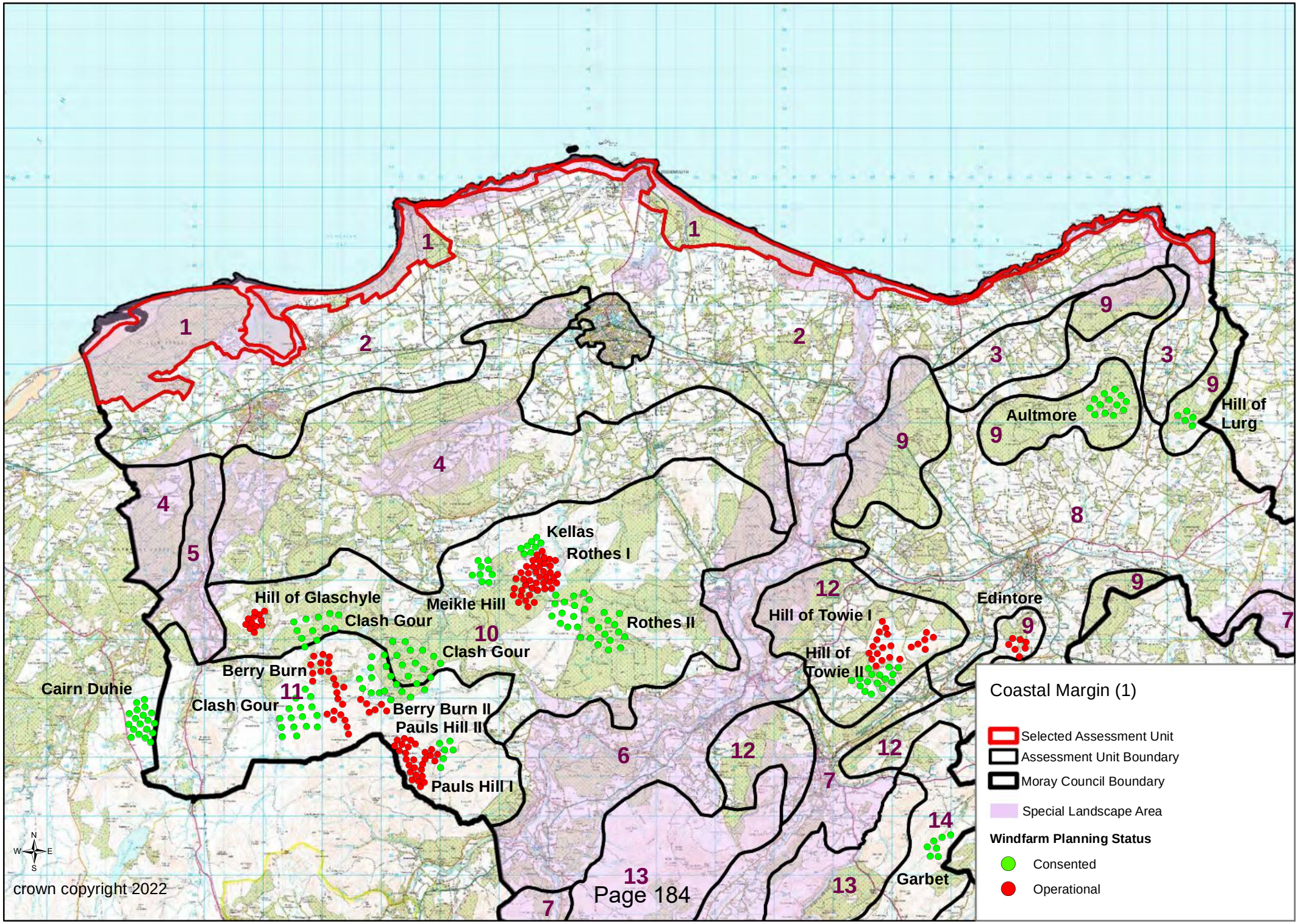
Dramatic rocky headlands, coves and cliffs between Burghead and Lossiemouth.

The focus the coast provides for recreation increases sensitivity

The setting to the many historic settlements located along the coast would be sensitive to intrusion by wind turbines.

A strong sense of naturalness and seclusion can be experienced on the coast away from settlement and especially when backed by the coastal forests

Coastal Margin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Aultmore
Hill of Lurg
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Kellas
Rothes I
Rothes II
Meikle Hill
Hill of Glaschyle
Clash Gour
10
Clash Gour
12
Hill of Towie I
Hill of Towie II
Edintore
9
7
Berry Burn
11
Clash Gour
Cairn Duhie
Berry Burn II
Pauls Hill II
Pauls Hill I
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Coastal Margin (1)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational

5 COASTAL FARMLAND (2)

5.1 Introduction

The *Coastal Farmland* Assessment Unit forms a low-lying plain extending in a broad band east/west across Moray and backing the *Coastal Margin* which lies to the north.

5.1.1 *Operational/consented wind farms*

Three operational wind turbines <50m high are located in this Assessment Unit close to the boundary with the *Coastal Margin* Assessment Unit at Findhorn. These turbines are widely visible across the very open western part of the *Coastal Farmland*.

Operational wind farms located in the uplands of Moray are more widely visible from the eastern part of the *Coastal Farmland* between Elgin and Fochabers and from areas closer to the coast in the east which do not benefit from the screening provided by the wooded ridges of the *Rolling Farmland with Forests*. The distance of operational and consented wind farms in views from this Assessment Unit, and their association with a relatively simple upland plateaux, reduces influence on character and views.

5.2 Summary description and assessment

This landscape forms an extensive low-lying plain which is gently undulating to flat but also features pockets of more rolling landform and occasional small, but prominent, ridges and hills. This fertile plain is intensively farmed with large fields of arable crops and some pasture interspersed with small conifer blocks. It is a well-settled landscape which accommodates a number of large settlements and major roads. Views are often extensive and tend to focus on the uplands of Moray to the south; views to the sea from lower-lying areas are often screened by forest or landform.

Small parts of this landscape are covered by SLA designations and there are also some important cultural heritage features, including Inventory listed GDLs and designated wetlands which increase value in parts of this Assessment Unit. Recreational use tends to focus on the landscape around the many towns and villages although Duffus and Spynie Castles are popular tourist destinations.

5.2.1 *Potential cumulative issues*

The three operational wind turbines at Findhorn within the *Coastal Farmland* have a localised effect on coastal character and views. Operational wind farms located within the uplands of Moray are visible from parts of this Assessment Unit and are generally seen at distances of >10km and do not have a strong influence on character and views. The consented Aultmore wind farm will lie closer to the eastern part of this Assessment Unit but will be partially screened by landform reducing effects.

Key cumulative issues that may arise within the *Coastal Farmland* are likely to include:

- An absence of rationale which could occur between operational and consented wind farms clearly associated with simple and more expansive upland areas and any potential large wind turbines sited within this more settled landscape.

- Multiple wind turbines (and particularly turbines >50m) which would be inter-visible across more open areas and could be seen from the A96 and other roads and from the edges of settlements and small hills and ridges, forming dominant features if repeated across the Assessment Unit.
- Variations in the type and size of single and small groups of small turbines and also cumulative effects with masts and other tall structures.
- Sequential cumulative visual impacts experienced when travelling through this landscape on the A96 and A98 including potential effects associated with wind farms within neighbouring Aberdeenshire.

5.2.2 *Constraints*

- Pockets of more rolling landform and woodlands which create a complex and smaller scale landscape in the Lhanbryde/Urquhart and Spynie areas and small knolly hills against the Lossie north-east of Elgin.
- The prominent small hills and ridges which rise abruptly from the low-lying coastal plain including Binn Hill and Tappoch close to the coast and Cluny Hill close to Forres.
- The extensive wooded policies and designed landscapes of Innes House, Brodie Castle, Gordonstoun and Gordon Castle and the more diverse environs of the lower Spey and proximity to the coast.
- The well-settled character of this landscape where wind turbines could dominate the scale of buildings.
- Areas with a more fragmented character influenced by disparate and often highly visible buildings and infrastructure and where wind turbines could exacerbate clutter.
- The setting of settlements and prominent cultural heritage features, for example, Old Duffus Castle and Spynie Palace and the SLAs covering the Lower Spey and Gordon Castle Policies and Spynie which increase value in parts of this landscape.
- The narrow extent of this landscape east of the Spey where larger turbines would be likely to impact on the more sensitive *Coastal Margin* and the smaller scale *Coastal Farmland with Rolling Hills.* The landmark hill of the Bin of Cullen would also be sensitive to larger turbines sited nearby.
- The openness of this landscape and its well-settled character which increases visual sensitivity.

5.2.3 *Opportunities*

- The simple landform and landcover found in parts of this landscape.
- The broad extent of much of this Assessment Unit which offers opportunities for development to be sited away from adjacent more sensitive landscapes such as the *Coastal Margin*.

5.3 Sensitivity and guidance

While the broad scale of the landscape and its predominantly simple landform and land cover pattern reduce sensitivity, the larger typologies (turbines >50m high) would dominate both the scale of farms and residential buildings which are evenly dispersed

across this landscape but also the larger industrial buildings which are occasional features. They could also exacerbate the fragmented and cluttered nature of infrastructure present in some areas, for example close to Kinloss and Lossiemouth. The more prominent hills and ridges would also be sensitive to large turbines sited on them or close-by. Pockets of more diverse landform and woodland and the setting of cultural heritage features and the SLAs additionally increases sensitivity in some areas. There would be a ***High*** sensitivity to turbines >100m, a ***High-Medium*** sensitivity to turbines 50-100m high and a ***Medium*** sensitivity to turbines 35-50m high.

Turbines <50m would be less likely to overwhelm the scale and setting of individual buildings and settlements and would be less prominent in the generally open views possible in this low-lying landscape particularly in relation to multiple developments.

Turbines should be sited to be visually associated with larger farm and industrial buildings or within less densely settled areas, set below ridge lines which could reduce prominence. Turbines should not be sited on, or nearby, the landmark hills of Tappoch and Binn Hill in this landscape and the Bin of Cullen and Quarry Wood in adjacent Assessment Units. Areas of more complex landform, woodlands, wetlands and the setting of settlements and cultural heritage features, including designed landscapes, should also be avoided. Some of these areas are designated SLAs and turbines should be sited to avoid significant effects on their character and special qualities.

5.3.1 *Sensitivity to smaller turbines <35m high*

The openness of this landscape would allow inter-visibility of multiple turbines and would increase potential for cumulative effects to arise. Multiple smaller turbines <35m would, if well-sited, be more likely to form incidental rather than dominant features if repeated across this landscape. The use of wind turbines of different sizes and designs in close proximity should be avoided as this can lead to a discordant appearance, particularly in areas where tall built infrastructure already create a cluttered appearance.

Detailed guidance on the siting of smaller turbines is set out in Appendix D.

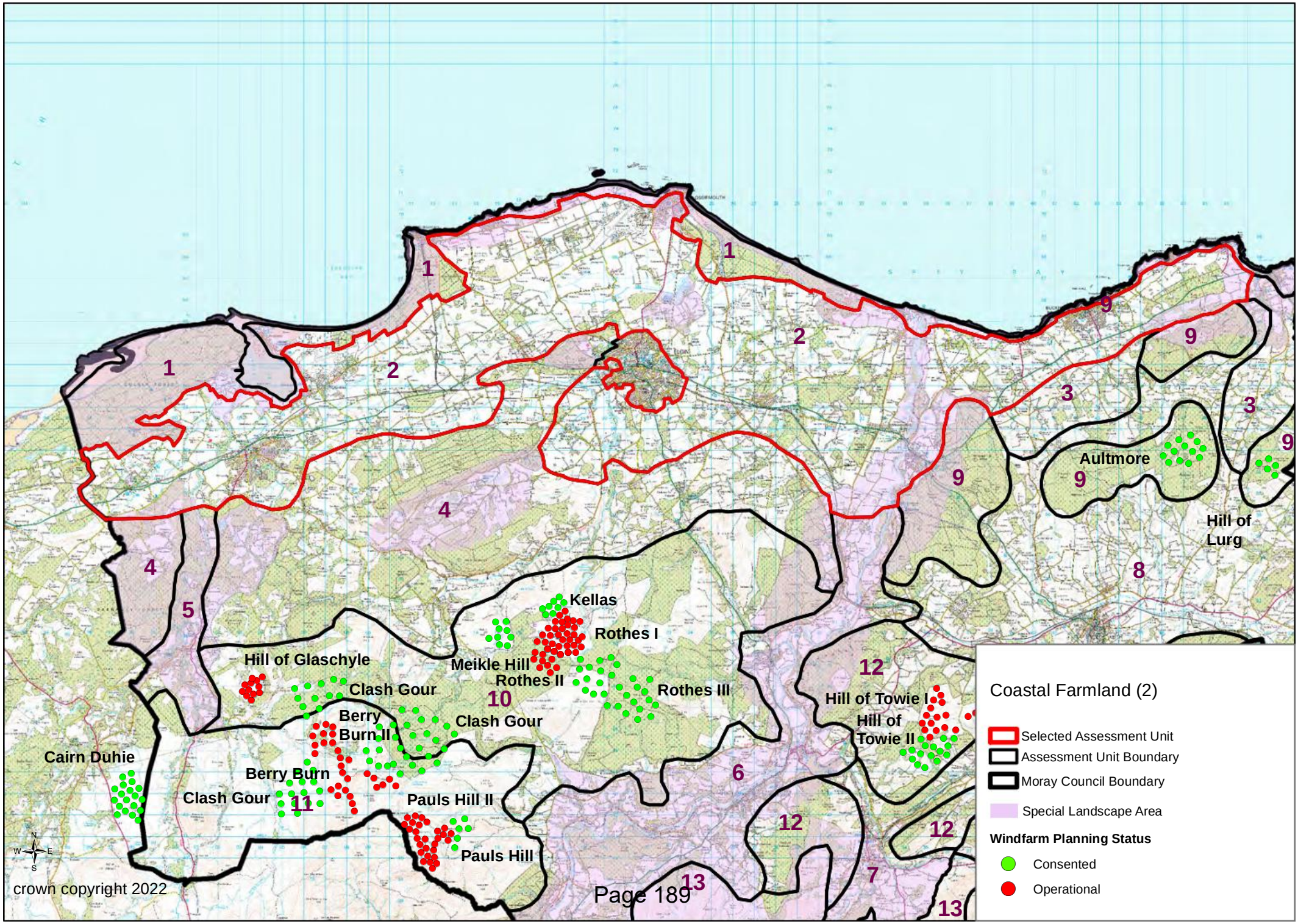
Low hills and ridges stand out in this low-lying coastal plain

Landcover is more diverse in the Spynie area where wetlands, water bodies and woodlands are present.

Castles, mansion houses and associated wooded policies form occasional features in this landscape and would be highly sensitive to intrusion by wind turbines

Broad and expansive areas of more open farmland allow long views

Coastal Farmland


Coastal Farmland (2)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
Aultmore
Hill of Lurg
Kellas
Rothes I
Meikle Hill
Rothes II
Rothes III
Hill of Glaschyle
Clash Gour
Berry Burn II
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6 ROLLING COASTAL FARMLAND (3)

6.1 Introduction

This landscape forms smaller scale rolling hill fringes and valleys backing the generally lower-lying and more gently undulating *Coastal Farmland*. This landscape rises to the south where it abuts the *Low Forested Hills* Assessment Unit.

6.1.1 *Operational/consented wind farms*

There are no operational wind farms or wind turbines located in this landscape. Operational wind farms located in other Assessment Units are not readily visible. The consented Aultmore and Lurg Hill wind farms located in the adjacent *Low Forested Hills* will be visible in relatively close proximity from roads and settlement in parts of this Assessment Unit.

6.2 Summary description and assessment

This landscape comprises rolling hill slopes and the valley of the Deskford Burn which fringes the higher and more simply patterned *Low Forested Hills* Assessment Unit. It has a varied landform with often interlocking steeper slopes and narrow incised valleys interspersed with occasional flatter areas and broader, more gently graded, slopes. Long belts of broadleaved trees and mixed woodlands characterise the policies of Cairnfield, Cullen and Letterfourie Houses, filling narrow valleys and enriching this landscape. The rolling landform, woodlands and pattern of medium-sized arable fields and pasture and regularly spaced houses, farms and settlements give a small-medium scale landscape. The *Low Forested Hills* form low skyline ridges immediately containing this landscape.

A SLA designation covers the lower Deskford valley (broadly according with the wooded policies of Cullen House and the lower slopes of the Bin of Cullen). Cullen House policies are an Inventory listed Garden and Designed Landscape which contributes to the value of this landscape.

6.2.1 *Potential cumulative issues*

The consented Aultmore and Lurg Hill wind farms, located in the adjacent *Low Forested Hills* Assessment Unit will be seen in close proximity principally from the Deskford valley. Key cumulative issues that may arise within this landscape are:

- An absence of rationale which could occur between wind farms clearly associated with the adjacent *Low Forested Hills* and any similarly large wind turbines sited within this smaller scale and more diverse and settled landscape.
- Cumulative effects from the B9018 where any larger wind turbines sited in this landscape could be seen in close succession and together with the consented Aultmore and Lurg Hill wind farms.
- Variations in the type and size of any single or small group of turbines proposed within this Assessment Unit.

- Multiple turbines sited within this Assessment Unit which could impact on views from the Bin of Cullen and from the *Coastal Farmland* with larger turbines likely to quickly form dominant features.

6.2.2 *Constraints*

- The small-medium scale of these rolling hill fringes and valleys which is reinforced by the presence of woodlands and a regular pattern of dispersed settlement.
- The complex landform of small interlocking hills, narrow valleys and undulating hill slopes which occurs in parts of this landscape.
- The rich pattern of policy landscape features including belts of fine broadleaved trees and parkland but also the more diverse naturalistic birch dominated woodlands within narrow valleys.
- The foreground this landscape provides to views to the landmark hill of Bin of Cullen from the A98.
- The proximity of this landscape to the parts of the *Low Forested Hills* where the consented Aultmore and Lurg Hill wind farms are located.
- The SLA which covers part of the Deskford valley and which principally relates to the Cullen House wooded policies and the Bin of Cullen.

6.2.3 *Opportunities*

- Upper hill slopes which are generally gentler and more open and where the landcover pattern is less pronounced and settlement sparser in some areas.
- Occasional larger agricultural buildings where the small turbine type could relate to their scale if sited nearby.

6.3 Sensitivity and guidance

The small to medium scale of these settled rolling hill fringes and valleys, the presence of diverse wooded policies together with the addition of consented wind farm development located on the adjacent *Low Forested Hills* increases sensitivity to larger turbines in this landscape. Sensitivity is ***High*** to turbines >50m and ***High-medium*** sensitivity to turbines 35-50m high. The more expansive and less well-settled gently graded upper slopes at the transition with the *Low Forested Hills* would be less sensitive to turbines <50m high. Potential cumulative effects with consented wind farms located in the *Low Forested Hills* are, however, likely to be a key constraint to accommodating turbines of this size.

6.3.1 *Sensitivity to smaller turbines <35m high*

Smaller turbines <35m high could also be located on more gently graded hill slopes but should be set well back from more diverse policy plantings and the narrow densely wooded valleys which are a distinctive feature of this landscape. This size of turbine could be sited on lower slopes where it would have less of a dominant effect on settled areas while potentially minimising cumulative effects with consented wind farms in adjoining upland landscapes. Turbines should not be sited on the top of prominent small hill tops with lower slopes providing greater scope to limit visual intrusion. Intrusion on

key views to the Bin of Cullen from the Deskford Valley and from the adjacent *Coastal Farmland* should also be avoided.

Detailed guidance on the siting of smaller turbines is set out in Appendix D.

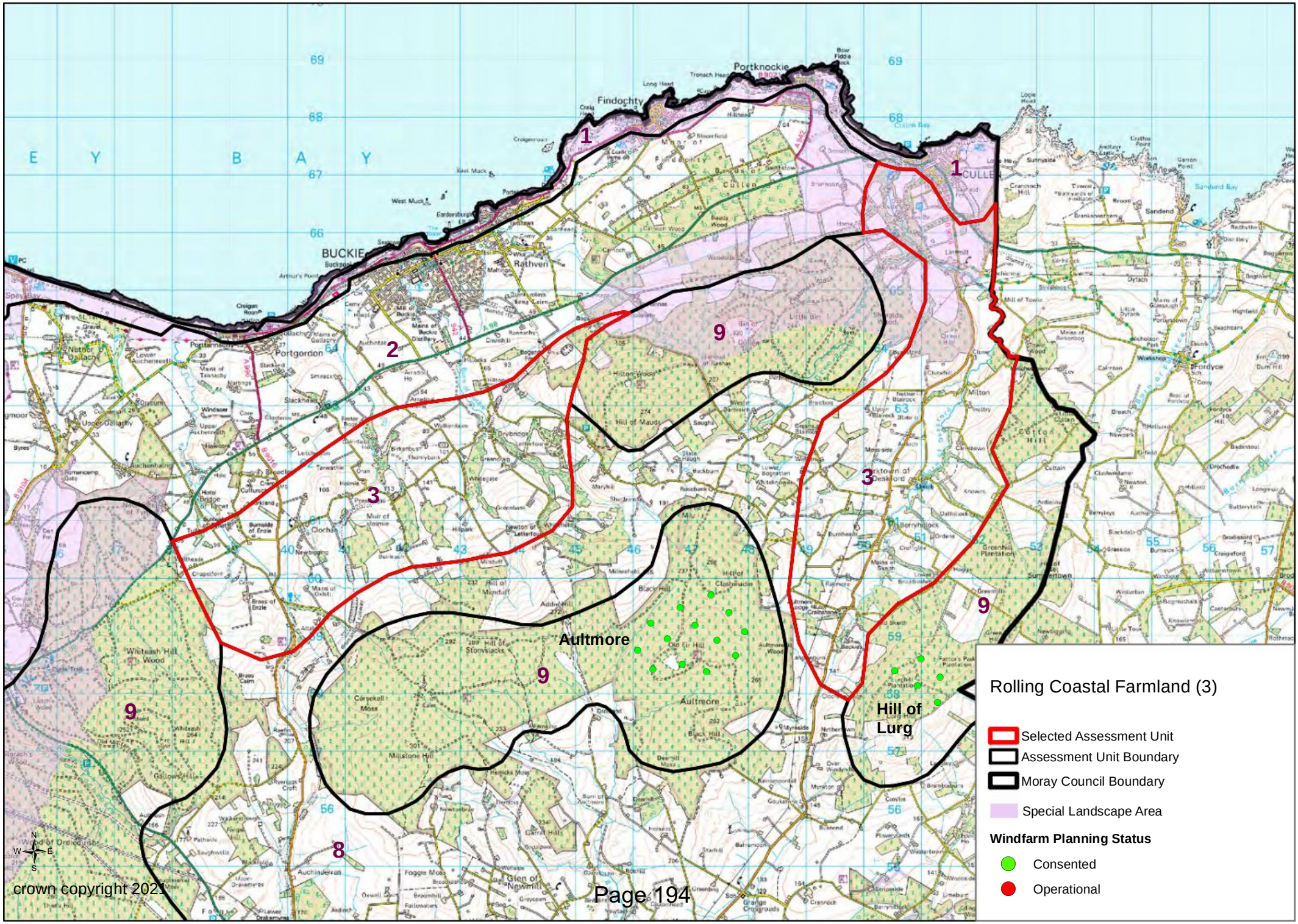
The landscape becomes more open and has a broader scale on upper hill slopes.

Long belts of broadleaved trees separate gently rolling fields.

The 'Low Forested Hills' forms a low and simple backdrop to this Assessment Unit.

Mixed woodlands, some of these forming the policies to mansion houses, occupy the narrow valleys on lower hill slopes

Rolling Coastal farmland



7 ROLLING FARMLAND AND FORESTS (4)

7.1 Introduction

The *Rolling Farmland and Forests* extends in an east/west band across Moray, forming a gradual transition between the flatter and more open coastal plain and the uplands. Differences in character occur within this Assessment Unit although the unifying feature is the small to medium scale of this landscape and the extensive forest which covers much of the area. The transition with the *Upland Moorland and Forestry* to the south is often wide and indefinite, reflecting the gradual rise in elevation and presence of more semi-improved pasture.

7.1.1 *Operational/consented wind farms*

There are no wind farms located in this Assessment Unit although two single operational turbines >50m are present. The operational wind farms of Rothes I and II are located in the adjacent *Upland Moorland and Forestry* and are visible in relatively close proximity from more open eastern parts of this landscape and from the upper Lossie valley. The operational Hill of Glaschyle and Berry Burn wind farms are also located in the *Upland Moorland and Forestry* and *Open Rolling Uplands* Assessment Units but are rarely visible from roads and settlement in this landscape. The consented Kellas and Meikle Hill wind farms and the consented Clash Gour and Berry Burn II wind farms located in the *Upland Moorland and Forestry* and *Open Rolling Uplands* Assessment Units will increase visibility from the upper Lossie valley and particularly from the B9010, in the vicinity of Dallas and from open ridges and summits within the forested ridges.

7.2 Summary description and assessment

This landscape has a complex and often contrasting rolling landform. The eastern part of this Assessment Unit forms gently rolling hill slopes fringing the higher *Upland Moorland and Forestry*. The deeply incised valleys of the upper Lossie and Pluscarden, contained by pronounced steep-sided wooded ridges, occur in the middle part of this landscape while the western area features more complex hummocky landform with low hills, becoming more subdued west of the Findhorn. A separate smaller wooded ridge at Quarrel wood also extends to the north-east, curving around the edge of Elgin. Romach Hill, located in the western part of this landscape, is seen widely from the coastal plain (the *Coastal Farmland* and *Coastal Margins* Assessment Units) of Moray.

The mosaic of farmland and often well-managed diverse estate-influenced forest is a key characteristic and this, together with the rolling landform, results in a small to medium scale. Fields on upper valley sides and slopes are commonly enclosed by stone walls and gorsey hedges with remnant trees. Narrow winding roads respond to the rolling landform or are aligned through the major valleys. There is a strong sense of enclosure in this landscape due to the rolling landform and the extensive forest. Many historic buildings, including distilleries, estate and farm buildings, are present in pockets of farmland set within forest and also associated with the broad floodplain farmland within the upper Lossie and Pluscarden valleys. Extensive wooded policies and parkland are associated with the Altyre estate and Darnaway Castle.

SLAs cover the western parts of this Assessment Unit either side of the Findhorn valley, Quarrel wood near Elgin, the Pluscarden valley and the Spey Valley to the east. Inventory listed GDLs and other designed landscapes, and built cultural heritage features, contribute to the value of these SLAs. Recreational use is focussed on the Findhorn valley and this valley and Pluscarden Abbey are important tourist destinations.

7.2.1 *Potential cumulative issues*

The operational Rothes I and II wind farm development is located in the adjacent *Upland Moorland and Forestry* and is seen in relatively close proximity from the south-eastern part of this Assessment Unit. The consented Kellas, Meikle Hill, Clash Gour and Berry Burn II wind farms will be principally seen from the upper Lossie valley in the central part of this Assessment Unit. Key cumulative issues that may arise are likely to include:

- The close inter-visibility between additional turbines located in the eastern part of this Assessment Unit and the operational Rothes I and II wind farm – even small turbines sited in the *Rolling Farmland and Forest* would appear large from close-by roads and settlement and could increase the visual clutter of turbines and transmission lines which are prominent in views.
- An absence of rationale which could occur between operational and consented wind farms clearly associated with simple and more expansive upland areas and any potential similarly large wind turbines sited within this smaller scale landscape.
- Inter-visibility between any wind turbines located on visually prominent hill tops or upper slopes where they would break the skyline seen together with operational and consented wind farms located in the *Upland Moorland and Forestry* and *Open Rolling Uplands* in longer views from settlement and roads in the open coastal plain of Moray.
- Variations in the type and size of any single or small group of turbines proposed within this landscape.
- Sequential visual impacts experienced when travelling through this landscape on the B9010, especially if all consented wind farms located in the nearby *Upland Moorland and Forestry* and *Open Rolling Uplands* are constructed.

7.2.2 *Constraints*

- The small to medium scale of this landscape which is influenced by the rolling landform, extensive woodland and settlement, and which increases susceptibility to larger turbines.
- More complex knolly landform, steep scarp slopes, the tops of well-defined low hills, prominent ridges and hills which would be susceptible to turbine development sited on or nearby these features.
- The integrity of well-managed and diverse woodlands which are particularly prevalent in the western part of this Assessment Unit.
- The open farmed floodplain which contrasts with the densely wooded ridges and enhances the scenic diversity of this landscape

- The setting of cultural heritage features including castles, estate houses and Pluscarden Abbey as well as the designed landscapes which often surround these historic built features.
- The settled nature of the valleys within the Assessment Unit and the recreational use of woodlands which increases visual susceptibility.
- Potential cumulative effects with operational and consented wind farm development seen in close proximity to the upper Lossie valley.
- The small scale of fields and clearings within extensive forest cover which reinforce a sense of intimacy experienced when travelling on narrow roads through this landscape – turbines are more likely to be visually prominent and become the focus of views within these rare open spaces.
- The widespread visibility and prominence of Romach Hill and its important role in providing screening of operational wind farms located within the adjacent *Upland Moorland and Forestry* Assessment.
- The setting provided by the rolling wooded hills in the western part of this landscape to the intimately scaled and highly scenic Findhorn valley.
- The SLAs which apply to the Pluscarden valley, Quarrel wood, the Spey Valley and the wooded estates lying close to the Findhorn valley.

7.2.3 *Opportunities*

- Broader and more even hill slopes on the fringes of the *Upland Moorland and Forestry* (where operational and consented wind farms are/will not be already prominent) and the long gently graded dip slopes of ridges where rising ground could form a backdrop reducing the prominence of smaller turbines.
- Occasional larger agricultural and distillery buildings where smaller turbines could relate to their scale and form a cluster of built development if sited nearby.
- The edges of larger areas of farmland within the extensive forest cover, next to farm buildings where smaller turbines could be sited to create ‘clusters’ of development.

7.3 Sensitivity and guidance

The small to medium scale of this landscape, the presence of more pronounced landform features and diverse woodland, potential cumulative effects with operational and consented wind farms in the east and the setting this landscape provides to historic buildings, designed landscapes and the Findhorn valley increases susceptibility. The value associated with parts of this Assessment Unit, and which are recognised by SLA designations and GDLs, additionally contribute to the higher sensitivity of this landscape. There would be a ***High*** sensitivity to turbines >50m high. Sensitivity would be ***High-medium*** for turbines <50m.

More expansive gently graded upper slopes at the transition with the *Upland Moorland and Forestry*, where landcover is simpler and settlement sparser, offer potential opportunities for turbines <50m high. Turbines should be sited to avoid intrusion on prominent skylines and should not detract from the landmark hills of Brown Muir, Romach Hill and Mill Buie. Significant cumulative effects with operational and consented wind farms should also be avoided by careful siting.

7.3.1 *Sensitivity to smaller turbines <35m high*

Smaller turbines <35m high could be more easily accommodated than turbines over this height on the edges of more extensive pastures on upper valley sides which are often bordered by forest. They could also be sited so associated with larger farm and distillery buildings at the transition with the *Coastal Farmland*. Turbines should be set back from the broad open valley floors where they would be visually prominent in long views from roads and settlement and should be sited well away from the dramatic steep scarp slopes of ridges. Turbines of this size sited in the western part of this landscape should not be sited within the centre of smaller open spaces within woodland.

All turbines should be sited to avoid significant intrusion on the setting of settlements, cultural heritage features and the Findhorn valley and also on the key qualities of the SLAs which cover parts of this Assessment Unit. Detailed guidance on the siting of smaller turbines is set out in Appendix D.

Parkland and mixed woodlands provide the setting to historic buildings within the estates lying in the west of this LCT.

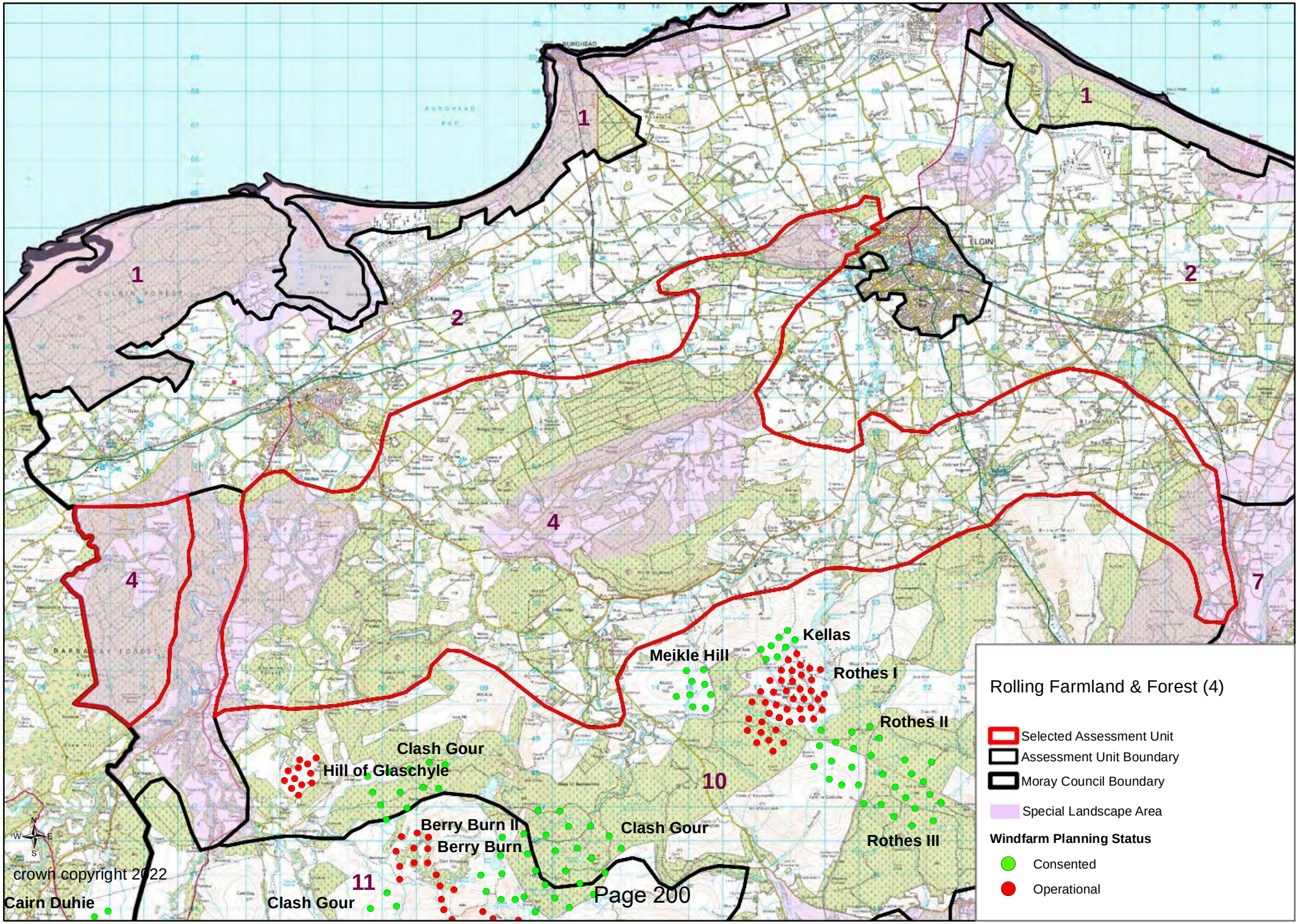
Broad, gently rolling fields on lower hill slopes are interspersed with bands of woodland in the eastern part of this AU.

Upper slopes have a simpler landcover pattern and more extensive scale

Ridges containing the Lossie and Pluscarden valleys have steep wooded scarp slopes and gently graded dip slopes.

Well-managed woodlands are a key characteristic of this landscape

Pockets of farmland appear carved out of the extensive forest in the western part of this AU


Rolling Farmland & Forest (4)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
Kellas
Meikle Hill
Rothes I
Rothes II
Rothes III
Clash Gour
Hill of Glaschyle
Berry Burn II
Berry Burn
Cairn Duhie
1
2
4
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11
ELGIN
BURGHEAD
crown copyright 2022

8 NARROW WOODED VALLEYS (5)

8.1 Introduction

The *Narrow Wooded Valley* Assessment Unit covers the incised and densely wooded valleys of the River Findhorn and its significant tributary, the Divie Burn. A gradual transition occurs with the adjacent *Rolling Farmland and Forest* due to the extensive woodland cover common to both these landscapes.

8.1.1 *Operational/consented wind farms*

A small single turbine is located close to Logie in this landscape. The operational Hill of Glaschyle wind farm, located in the adjacent *Upland Moorland and Forestry*, is visible from some areas of open farmland on the shoulders of the valley and from some sections of footpath within the deeply incised Findhorn valley. The consented Cairn Duhie wind farm located within the *Open Rolling Upland* in Highland Council area may be visible from more open higher farmland in the southern part of this Assessment Unit. The consented Clash Gour wind farm will also be visible from a short section of the A940 and, more extensively, from the Dava Way recreational route.

8.2 Summary description and assessment

The Rivers Findhorn and Divie occupy narrow, incised and dramatically rocky gorges with steep, undulating slopes which are densely wooded with a diverse mix of Scots pine, beech, oak and occasional exotic tree species. Occasional pockets of pasture on more gently sloping higher valley sides appear carved out of the forest and are commonly fringed with birch. The sequence of small irregularly shaped open spaces within extensive woodland is a key characteristic of this landscape. This area is managed by several estates and this strongly influences the character of built features. Several large houses are set within woodland overlooking dramatic bends in the rivers. Otherwise, the area is sparsely settled with farms and cottages largely associated with clearings. There are relatively few roads although the A940, which forms a key approach into Moray, is aligned on the western side of this Assessment Unit. Well-used footpaths are aligned through woodland perched high above the River Findhorn. Views are generally restricted by dense woodland although rare pockets of farmland often provide long views over the valleys and to the skyline of adjacent uplands.

This Assessment Unit is wholly covered by a SLA designation in recognition of its scenic and richly diverse landform and woodlands. Walks within the Findhorn valley are popular and promoted to visitors.

8.2.1 *Potential cumulative issues*

There is potential for cumulative landscape and visual effects to arise with operational and consented wind farms located in the *Upland Moorland and Forestry* and within the *Open Rolling Upland* Assessment Units. Key cumulative issues that may arise are likely to include:

- An absence of rationale which could occur between operational and consented wind farms clearly associated with simple and more expansive upland areas and any potential similarly large wind turbines sited within this smaller scale landscape.
- Inter-visibility between any wind turbines located on open farmland and upper slopes of this landscape and operational and consented wind farms sited within the *Upland Moorland and Forestry* and *Open Rolling Uplands* in longer views from settlement and minor roads in open areas of farmland and from the A940, an important scenic route into Moray
- Variations in the type and size of any single or small group of turbines proposed within this landscape.
- Sequential visual impacts experienced when travelling through this landscape.

8.2.2 *Constraints*

- The low relief, small landforms and steep-sided gorges which characterise much of this landscape.
- The open spaces, particularly the smaller spaces surrounded by trees where the enclosure reinforces a sense of intimacy and discovery when travelling from space to space.
- The small scale of areas of farmland within extensive forest cover which reinforce a sense of intimacy experienced when travelling on narrow roads through this landscape – turbines are more likely to be visually prominent and become the focus of views within these rare open spaces, particularly if they are larger sized turbines and/or sited in the centre of open spaces.
- The setting of historic buildings and their ornamental wooded policies which contribute to the character of these valleys.
- Views from the A940 and the scenic ‘gateway’ it forms to Moray on arrival from the south over Dava Moor.
- Cumulative effects with operational and consented wind farm developments sited in the adjacent *Upland Moorland and Forestry* and the part of the *Open Rolling Uplands* which lies in Highland Council area.
- The SLA which covers this Assessment Unit and which recognises the scenic qualities of the landform, woodlands and the recreational value of this landscape.

8.2.3 *Opportunities*

- Gently graded slopes set away from the more complex landforms and the setting of the dramatic gorges.
- The edges of clearings next to farm buildings where smaller turbines could be sited to create ‘clusters’ of development thus minimising clutter and cumulative effects.
- Larger areas of open fields, especially when backdropped by higher land or forestry.

8.3 Sensitivity and guidance

The dramatic gorges and their setting, the intimate scale and the integrity of historic built features increase susceptibility to larger wind turbines. Although views within this landscape are limited, rare open spaces and the A940, which provides a scenic 'gateway' into Moray from Dava Moor, are also susceptible to intrusion from larger wind turbines. The SLA and other values associated with this landscape contribute to the finding of ***High*** sensitivity to turbines >35m high.

8.3.1 *Sensitivity to smaller turbines <35m high*

Smaller turbines below 25m high would have a better relationship to the gently graded upper valley sides where larger areas of farmland are present where they would have a less dominant effect on the scale of this landscape and may additionally benefit from screening by woodland in longer views. Turbines sited in these areas should avoid intruding into the centre of small open spaces set within woodland, on the setting of historic houses and their designed landscapes and also on the setting of the river gorges and more complex landform. They should be sited to minimise cumulative effects on views from the A940. Turbines could be sited so visually associated with buildings to reflect the scattered settlement pattern.

Detailed guidance on the siting of smaller turbines is set out in Appendix D.

8.3.2 *Wind farms located in adjacent upland areas*

This landscape is sensitive to wind farm development sited on the outer edges of adjoining *Upland Moorland and Forestry* and the *Open Rolling Uplands* where it may form a prominent feature in views from valley footpaths, from rare open areas of farmland and seen sequentially from the A940, an important approach to Moray. It will be important to avoid a dominant effect in terms of the size of turbines, their proximity to key views and the extent of development seen on containing skylines.

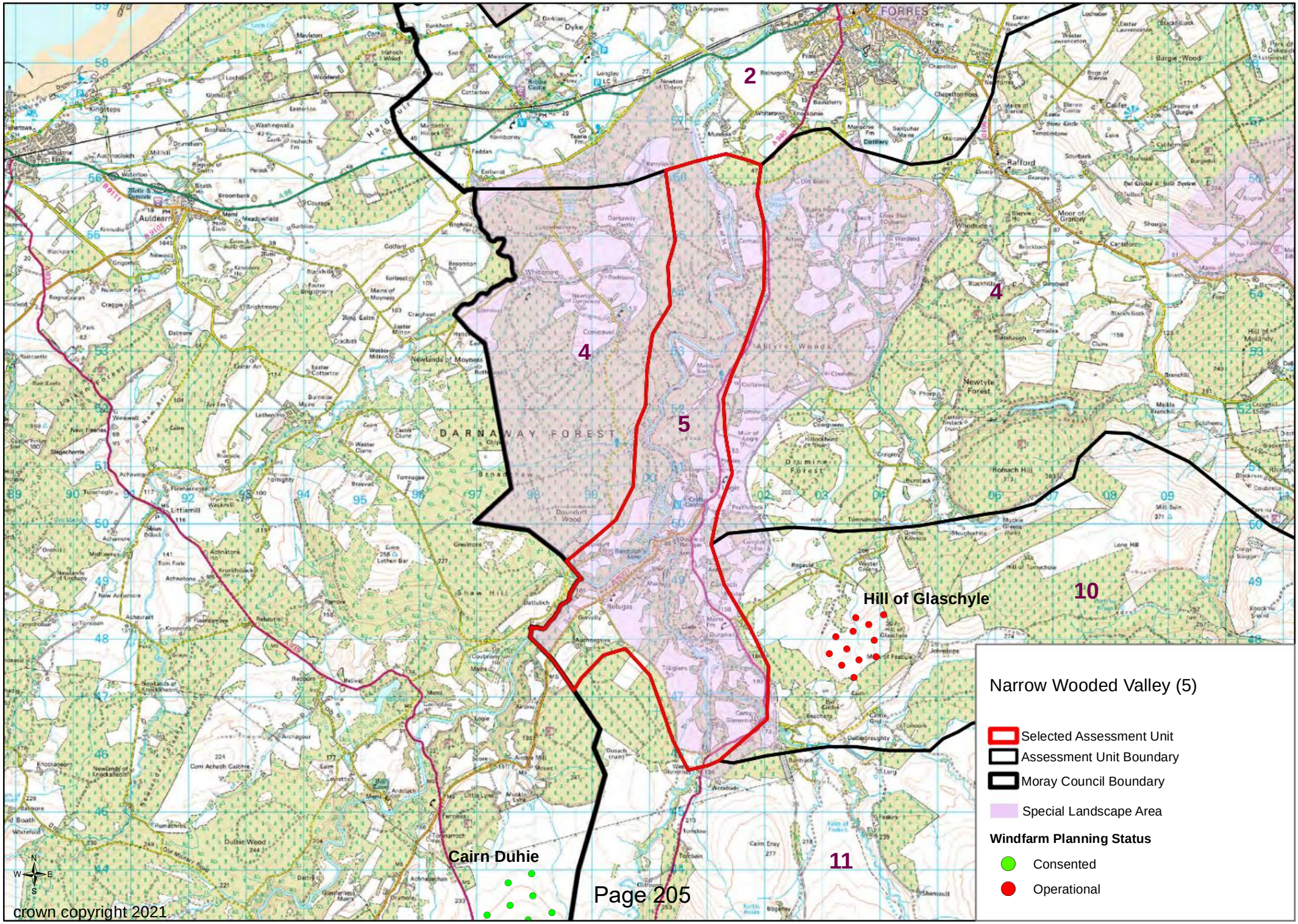
Small walled pastures on the more gently sloping open shoulders of the valley.

Rare valley floor pastures contained by policy woodlands - the skyline above these intimately scaled spaces would be susceptible to intrusion by wind turbines

The narrow, wooded gorges are a key characteristic, attracting historic development, such as estate houses and fine bridges

Diverse woodland covers much of this Assessment Unit and limits long distance views.

Narrow Wooded Valleys


Narrow Wooded Valley (5)
🟥 Selected Assessment Unit
▭ Assessment Unit Boundary
▭ Moray Council Boundary
▨ Special Landscape Area
Windfarm Planning Status
🟢 Consented
🔴 Operational
Hill of Glaschyle
Cairn Duhie
2
4
4
5
10
11
FORRES
DARNAWAY FOREST
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9 BROAD FARMED VALLEY (6)

9.1 Introduction

The *Broad Farmed Valley* Assessment Unit covers the more enclosed valley of the Spey in Moray. This valley landscape merges gradually with the adjacent uplands of the *Upland Moorland and Forestry*, *Open Rolling Uplands* and *Open Rolling Uplands with Steep-Sided Slopes* and continues south-westwards into Highland area.

9.1.1 *Operational/consented wind farms*

Some operational small single turbines are located within this landscape. A number of operational wind farms are seen on the uplands surrounding the Spey valley. These include the Hill of Towie, Rothes I and II and Paul's Hill wind farms. The consented Paul's Hill II, Clash Gour and Rothes III wind farms, which all comprise significantly larger turbines than those within these operational wind farms, will be seen in much closer proximity to this Assessment Unit. The consented Berry Burn II wind farm will also comprise larger turbines but will be likely to have less of an intrusive effect on the Spey Valley than other consented wind farms due to its more central location within the upland core.

9.2 Description and assessment findings

The Spey forms a broad sinuous central river aligned through a narrow, incised channel in the south-west but opening out north of Craigellachie to wind across a wider floodplain set between steep-sided and densely forested hills. The course of the Spey is traced by diverse mixed woodlands of birch and pine with policy woodlands associated with a number of estates also located on lower valley sides. Numerous tributary rivers and burns run through narrower valleys to the Spey. Broader undulating valley sides with more gently sloping terraces accommodate mixed farmland and small woodlands. Larger arable fields tend to occur on lower valley sides with smaller pastures and coniferous plantations on upper slopes. The Spey valley is well-settled and features distinctive planned settlements, castles and distillery buildings. The hills of Ben Rinnes, Roy's Hill and Ben Aigan form prominent landmark features seen from the Spey Valley.

This Assessment Unit is largely designated as a SLA in recognition of the scenic quality of the Spey valley and the focus it provides for recreation. The association of this part of the Spey valley with the production of whisky attracts tourism and contributes to the value associated with this landscape. The Speyside Way long distance footpath is aligned through much of this Assessment Unit.

9.2.1 *Potential cumulative issues*

There is potential for cumulative effects to arise with operational wind farms located in the *Upland Moorland and Forestry, Open Rolling Upland* and *Rolling Forested Hills*. The Rothes I and II wind farm is barely visible from this Assessment Unit being generally set back into the core of the *Upland Moorland and Forestry* and partially screened by the hill of Carn na Cailliche. The operational Hill of Towie and Paul's Hill wind farms are more visible although the partial screening provided by Roy's Hill to the Paul's Hill wind farm, the relatively limited extent of both these developments and their location on lower

sections of skyline minimise landscape and visual effects on the Spey valley. The consented Paul's Hill II, Clash Gour and Rothes III wind farms will be prominent, particularly seen in combination from the Upper Knockando area and widely in views across the southern sides of the Spey valley.

Key cumulative issues that may arise are likely to include:

- Further wind farm development sited closer to the outer edges of the uplands likely to result in a dominant effect on the scale and character of the Spey valley and on views from roads, recreational routes and settlement, given the extent and intrusion of consented wind farms located in adjacent uplands.
- An absence of rationale which could occur between operational and consented wind farms clearly associated with adjacent simple and more expansive upland areas and any potential similarly large wind turbines sited within this smaller scale and more settled landscape.
- Variations in the type and size of any single or small group of turbines proposed within this landscape.

The consented wind farms of Paul's Hill II and Rothes III wind farms will diminish the screening properties and character of the landmark hills of Roy's Hill and Carn na Cailliche due to their close proximity to these hills. It is important that any further wind farm development avoids exacerbation of adverse effects on these hills and on the landmark hills of Ben Aigan and Ben Rinnes due to their prominence in views across the Spey valley.

9.2.2 *Constraints*

- The scenic juxtaposition of the settled pastoral Spey Valley with the dramatically steep-sided and rugged Ben Rinnes and Roy's Hill and views to these and other landmark hills.
- More complex landform features including incised sections of valley, rolling lower hill slopes, small areas of floodplain and occasional rocky scarps which contribute to the diversity of this landscape.
- The consistent presence of small-scale features such as farms and houses, enclosed fields, field trees and woodlands which provide ready scale references.
- The setting of historic houses and castles and their designed landscapes, settlements and traditional distilleries.
- The popularity of the Spey valley for tourism and the distinct sense of place associated with whisky production.
- Potential cumulative effects with operational and consented wind farms in adjacent upland areas.
- The SLA which covers much of this landscape and recognises the scenic, recreational and tourism value associated with the Spey valley.

9.2.3 *Opportunities*

- Broader, upper valley sides with a simple and more gently undulating landform lying at the transition with the less dramatic upland areas which would be less sensitive to smaller turbines.

9.3 Sensitivity and guidance

While the *Broad Farmed Valley* of the Spey increases in scale on the broad and more open upper shoulders of the valley, the regular pattern of farms and other buildings, enclosed fields and smaller woodlands generally reduces scale and increases susceptibility to larger wind turbines. Cumulative effects with wind farm development in adjoining upland landscapes additionally increases susceptibility and sensitivity is increased because of the value attached to this landscape. There would be a ***High*** sensitivity to turbines >50m high. Sensitivity would be ***High-medium*** for turbines 35-50m high.

More gently undulating valley sides and the broader terraces that sit above the more enclosed, incised and intimately scaled river valley provide opportunities for turbines <50m high. Care should be taken to avoid impacting on the more dramatic steep-sided hills, such as Ben Rinnes, Roy's Hill and Ben Aigan, and key views to them. Turbines of this size should be sited within less densely settled areas with a simpler landcover pattern at the transition with the adjacent uplands although potential cumulative effects with operational wind farms would need to be carefully considered.

9.3.1 *Sensitivity to smaller turbines <35m high*

There are greater opportunities to site multiple turbines <35m high in this landscape particularly as these would have a better scale relationship to larger buildings and would concentrate built development if located nearby. The more contained narrow and incised glens and the open floodplain of the Spey would, however, be sensitive even to these smaller turbines.

Detailed guidance on the siting of smaller turbines is set out in Appendix D.

9.3.2 *Wind farms located in adjacent upland areas*

This landscape is highly sensitive to wind farm development sited on the outer edges of adjoining upland areas where it would be likely to form a dominant feature in views from settlement and important tourist routes such as the A95 and could have cumulative effects with other operational and consented wind farms.

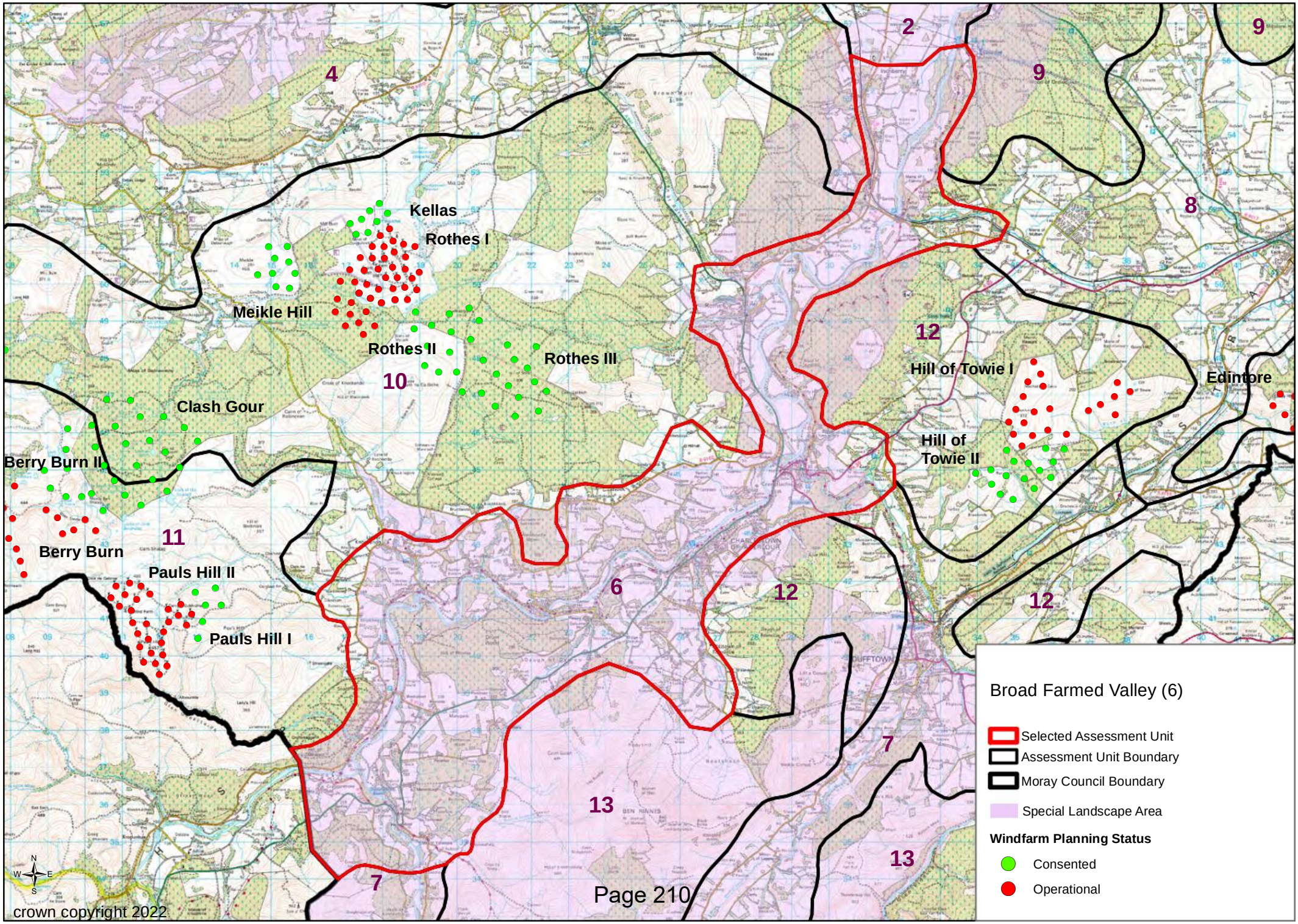
The valley is farmed and well-settled with a regular pattern of small farms, planned settlements and distilleries.

The Spey Valley is broader in its upper reaches within Moray with more expansive gently undulating hill slopes merging with the Upland Moorland and Forestry (10).

The 'landmark' hill of Ben Aigan seen across the farmland of the Spey Valley.

The Spey is often deeply incised with steep wooded slopes although areas of flat floodplain also occur particularly in its lower reaches around Rothes.

Broad Farmed Valley


2
9
4
9
8
Kellas
Rothes I
Meikle Hill
Rothes II
Rothes III
10
12
Hill of Towie I
Edintore
Clash Gour
Hill of
Towie II
Berry Burn II
Berry Burn
11
Pauls Hill II
Pauls Hill I
6
12
12
7
13
13
7
Broad Farmed Valley (6)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
N
W
E
S
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10 NARROW FARMED VALLEYS (7)

10.1 Introduction

The *Narrow Farmed Valleys* cover the valleys of the upper Isla, the lower Fiddich, Glen Rinnes, Glenlivet and the upper Deveron.

10.1.1 *Operational/consented wind farms*

There are no operational or consented wind farms or turbines located in this Assessment Unit. The operational wind farm of Hill of Towie, and its consented extension, are located in the *Rolling Forested Hills* and are visible in close proximity from the upper Isla valley. The operational Dorenell wind farm is located in the *Open Uplands with Settled Glens* and is visible from the south-east facing slopes of Glen Rinnes and from parts of the upper Deveron and the Fiddich.

10.2 Summary description and assessment

These valleys are narrow and have a small to medium scale which is reinforced by their well-settled character. The valleys are strongly contained by steep farmed and wooded slopes with adjacent uplands forming immediate skyline ridges. More rolling landform occurs at the junction between Glen Rinnes and Glen Fiddich south-east of Dufftown. The Deveron and upper Isla valleys have a particularly diverse land cover with mixed policy woodlands and avenue trees contributing to the richness of well-managed farmland. Coniferous shelterbelts and small native woodlands form a distinct pattern across the undulating pastures of Glen Rinnes and Glenlivet. Although these valleys are not readily visible from adjacent landscapes due to their visual containment, they are well-settled with a regular pattern of farms and occasional distillery buildings. They also contain main roads and are seen from elevated recreational routes in nearby hills, including from Ben Rinnes.

Some of these valleys are designated as SLAs, principally in recognition of their scenic qualities. The association of Glens Rinnes and Fiddich with whisky production additionally increases their value in terms of tourism. The Cairngorms National Park borders this Assessment Unit with part of Glenlivet lying in the designated area.

10.2.1 *Potential cumulative issues*

The operational Hill of Towie and Dorenell wind farms lie in close proximity to some of these valleys. The operational Clashindarroch wind farm is visible from part of the upper Deveron valley. Key cumulative landscape and visual issues include:

- An absence of rationale that would occur between large turbines sited in the less settled, simpler and more expansive adjacent upland landscapes and also within these more settled smaller scale valleys which could lead to visual clutter and erode perceived differences in landscape character.
- Multiple turbines sited within these valleys which could be seen sequentially from roads.
- Variations in the size and style of smaller wind turbines that may be located in this landscape.

10.2.2 *Constraints*

- The presence of small-scale features such as farms and houses, enclosed fields and woodland which provide ready scale references.
- Incised and narrow valley floors and the often more complex rolling landform of side slopes and more pronounced small hills.
- The rich diversity of land cover which includes policy woodland, a strong pattern of shelterbelts, field and avenue trees, small enclosed fields and occasional pockets of wetland and native woodlands.
- Cumulative effects with larger turbines which are in the main clearly associated with more expansively scaled adjacent upland areas.
- The setting of the planned village of Dufftown and other settlements and historic buildings, including Auchindoun Castle which is prominently sited high above the River Fiddich.
- Views from the public roads which are aligned through these valleys, many of which are well-used by tourists, and from settlement and hill paths.
- The SLAs which cover Glen Fiddich, Glenlivet and part of the Deveron valley.

10.2.3 *Opportunities*

- Broader, more gently sloping upper valley sides and more extensive undulating terraces, usually at the transition with adjacent upland landscapes, where smaller turbines could be sited and would have greater potential to minimise cumulative effects with wind farms sited in adjacent upland areas.

10.3 Sensitivity and guidance

The small to medium scale of these narrow, strongly contained and settled valleys, the potential for cumulative effects to occur with wind farms located in adjacent upland landscapes and the value associated with much of this Assessment Unit increases sensitivity. Sensitivity would be ***High*** to turbines >50m and ***High-medium*** to turbines <50m.

Upper slopes and terraces within broader valleys could accommodate turbines <50m high although care would be needed to minimise cumulative effects with operational and consented wind farms in adjacent upland areas. All turbines should be sited to avoid more complex landform features and areas with a more pronounced pattern of trees and policy woodlands. They should avoid being sited on upper slopes close to operational and consented wind farms prominent on immediate containing skylines above these valleys and should also minimise visual confusion with the intrusive Dorenell wind farm to Blackhillock sub-station 132kV overhead transmission line in the area between Glen Fiddich and Glen Rinnes.

10.3.1 *Sensitivity to smaller turbines <35m high*

Turbines under 25m high would have a better relationship to the scale of the narrower valleys and would have greater potential to reduce cumulative effects with operational/consented wind farms located in adjacent upland areas. Detailed guidance on siting smaller turbines is contained in Appendix D.

10.3.2 *Wind farms located in adjoining upland areas*

These valleys are sensitive to large turbines located in adjacent upland areas which would be prominent on the skyline of containing hills. The horizontal extent of wind turbine development, the size of turbines and their proximity to these valleys and their effect on more prominent sections of skyline will be important factors to consider when appraising specific developments.

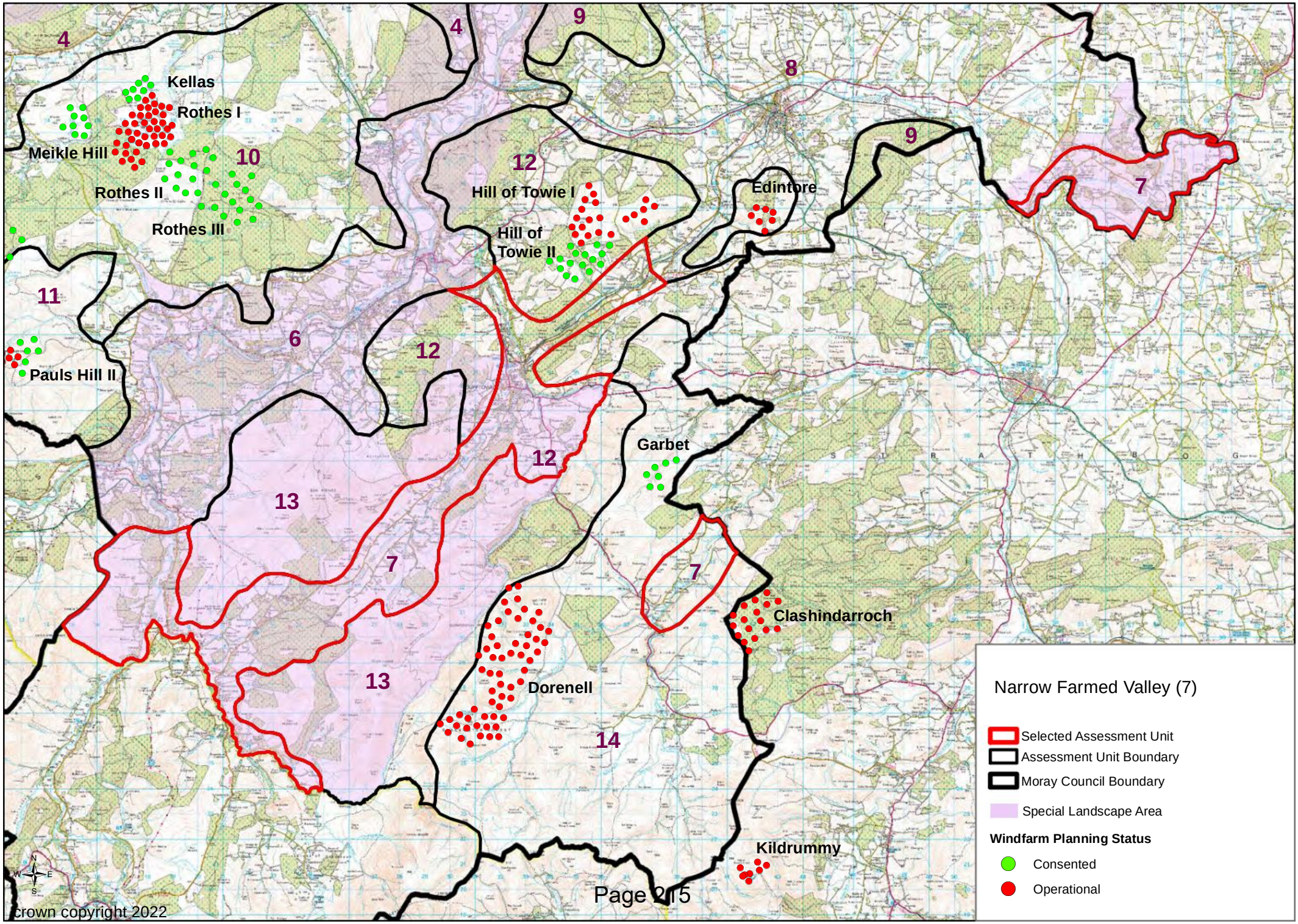
More open farmland occurs within narrow valley floors and on lower hill slopes. Mixed woodlands pattern valley sides and policy plantings are also present in the upper Isla and Deveron.

Low, rounded and interlocking hills contain these river valleys – settlement often extends high on upper slopes. These small-scale valleys are sensitive to large wind turbines sited on prominent containing ridges.

Undulating pastures within Glen Rinnes backed on its eastern edge by the rugged scarp of the 'Open Uplands with Steep Slopes'.

Occasional larger distillery buildings are a feature in some of these valleys

Narrow Farmed Valleys


4
4
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7
Kellas
Rothes I
Meikle Hill
10
Rothes II
Rothes III
12
Hill of Towie I
Hill of Towie II
Edintore
11
6
12
Pauls Hill II
Garbet
12
13
7
7
Clashindarroch
13
Dorenell
14
Kildrummy
Narrow Farmed Valley (7)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
N
W
E
S
crown copyright 2022

11 UPLAND FARMLAND (8)

11.1 Introduction

The *Upland Farmland* comprises extensive gently undulating farmland centred on the shallow valleys of the Isla and its tributaries.

11.1.1 *Operational/consented wind farms*

Single and small groups of wind turbines (70-92m) are located near Grange Crossroads and on the south-west facing slopes of Lurg Hill. The operational Hill of Towie wind farm, located in the adjacent *Rolling Forested Hills* is clearly visible from this Assessment Unit. The operational Edintore wind farm and the consented Aultmore and Lurg Hill wind farms located in the *Low Forested Hills* lie close to the *Upland Farmland*.

11.2 Summary description and assessment

The *Upland Farmland* Assessment Unit encompasses the broad shallow valleys largely lying to the north of the River Isla. This landscape has a simple land cover of open farmland with large fields of pasture predominantly enclosed by post and wire fences. There is an even distribution of farms across this extensive area, accessed by a network of minor roads. This landscape is edged by the *Low Forested Hills* which often form a low dark backdrop to more settled and open farmland. The Bin of Cullen, Meikle Balloch and Knock hill form distinctive 'landmark' features prominent in views from this landscape. The planned settlement of Keith is located in this landscape. This Assessment Unit is highly visible from the A95 and railway and from the prominent hills which lie in adjacent Assessment Units and which form a focus for recreation.

The Deveron valley and Portgordon to Cullen Coast SLAs cover small parts of this landscape. Parts of this landscape are attractive to tourists visiting distilleries in the Keith area.

11.2.1 *Potential cumulative issues*

Operational wind turbines sited on Lurg Hill and close to Grange Crossroads are widely visible across much of this landscape. Operational and consented wind farms at Edintore, Hill of Towie, Aultmore and Lurg Hill increase visibility of wind farm development in close proximity to this Assessment Unit. Key cumulative landscape and visual issues include:

- Multiple single turbines associated with the majority of land holdings across this well-settled landscape would result in significant visual clutter and confusion.
- Large turbines visible on every hilltop/forested plateau within the adjacent *Low Forested Hills* would be likely to have a dominant and overwhelming effect on this landscape.
- Potential sequential cumulative visual effects on views from the A95 and A96 through Moray and into Aberdeenshire where a number of operational wind farms and small groups of tall turbines are sited (the screening provided by ridges and hills on the Aberdeenshire/Moray border limits inter-visibility).
- An absence of rationale which could occur between consented wind farms clearly associated with the simpler, more expansive *Low Forested Hills* and the same

size of turbines sited in this Assessment Unit – this occurs already in the Grange Crossroads area.

- Variations in the type and size of single or groups of turbines proposed within this landscape.

11.2.2 *Constraints*

- The presence of small features such as farms and houses and enclosed fields and woodlands which provided ready scale references.
- Cumulative effects with larger turbines in the adjacent *Low Forested Hills* and exacerbating the existing clutter of wind turbines sited near Grange Crossroads and Lurg Hill and transmission line and sub-station infrastructure around Keith.
- The openness of this landscape which allows extensive views.
- Views of the distinctive landmark hills in this and adjoining landscapes which include the Bin of Cullen, Meikle Balloch and Knock Hill.
- The SLAs and also skylines seen from the Deveron and Deskford valleys which lie within these designated areas.

11.2.3 *Opportunities*

- The simple, gently undulating landform and medium scale of this landscape.

11.3 Sensitivity and guidance

While the openness, generally gently undulating landform and simple landcover of this landscape increases its scale, the presence of an even dispersal of small farms and houses would be dominated by larger wind turbines. The potential for cumulative effects to occur with large turbines sited both in this landscape and in adjoining upland landscapes additionally increases sensitivity. There would be a ***High*** sensitivity to turbines >100m, a ***High-medium*** sensitivity to turbines 50-100m high and a ***Medium*** sensitivity to turbines <50m.

Turbines should not be sited on or nearby the landmark hills located in this and adjacent Assessment Units. Cumulative effects with operational and consented wind farms and single/small groups of turbines located in this landscape and within the adjacent *Low Forested Hills* are likely to restrict opportunities for turbines 35-50m high.

11.3.1 *Sensitivity to smaller turbines <35m high*

The use of smaller turbines <35m could minimise cumulative effects as they could be less prominent if carefully sited and could concentrate built development if visually associated with farm buildings and thus avoid exacerbating the cluttered appearance of parts of this landscape.

Detailed guidance on the siting of smaller turbines is set out in Appendix D.

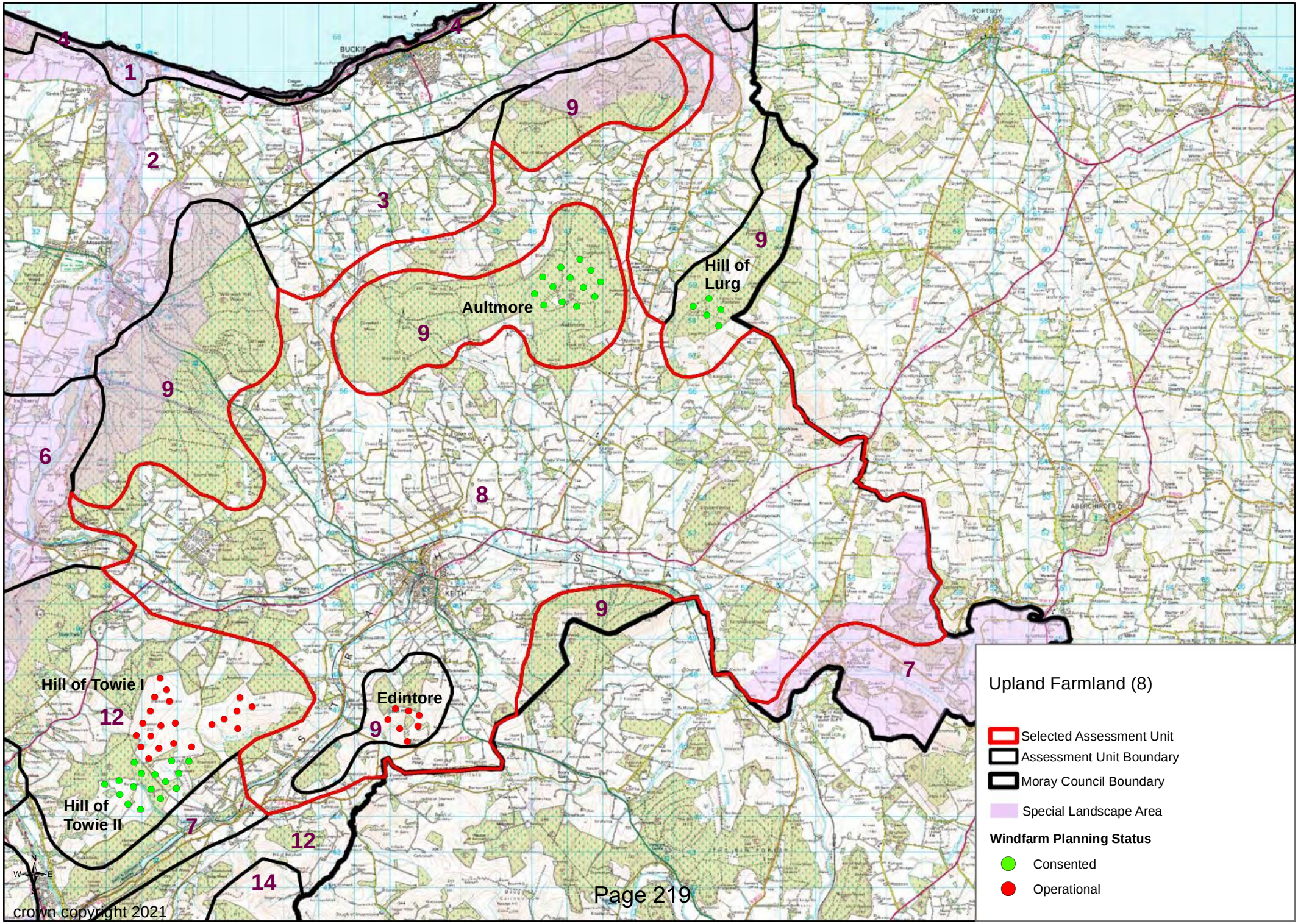
Although landform is broad and gently rolling, the presence of a regular pattern of farms, small woodlands and other settlement reduces the scale of the landscape.

Existing tall single and small groups of wind turbines form prominent features within the northern parts of this landscape.

Knock Hill forms a landmark in views from both this landscape and from neighbouring Aberdeenshire.

Smaller wind turbines are generally associated with farms

Upland Farmland


Upland Farmland (8)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
Aultmore
Hill of Lurg
Hill of Towie I
Hill of Towie II
Edintore
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12 LOW FORESTED HILLS (9)

12.1 Introduction

This Assessment Unit comprises the predominantly forested broad upland plateaux and low hills which lie within and on the edges of the *Upland Farmland*. The assessment considers the sensitivity of turbines >100m high in detail in this upland landscape, providing summary guidance only for smaller turbines.

12.1.1 *Operational/consented wind farms*

The operational Edintore and the consented Aultmore and Lurg Hill wind farms are located in this Assessment Unit. Some areas of this landscape lie close to a number of operational large single turbines sited in the adjacent *Upland Farmland* in the vicinity of Lurg Hill and Grange Crossroads. The operational Hill of Towie wind farm and its consented extension, located in the adjacent *Rolling Forested Hills* is also visible from the more open parts of this Assessment Unit.

12.2 Summary description and assessment

This landscape comprises the predominantly forested broader hills and upland plateaux which contain the lower lying settled bowl of the *Upland Farmland* which encompass the Isla Valley and its northern tributaries. Although the majority of these upland areas have a simple landform of gentle slopes, broad indistinct summits and rounded ridges, the more defined conical 'landmark' hills of Bin of Cullen and Meikle Balloch also occur. This landscape is sparsely settled with settlement confined to small farms on lower hill slopes. The lower areas of upland plateaux are densely forested and are not settled. The western forested plateaux form a backdrop to Fochabers, the Gordon Castle designed landscape and the Spey valley while the Bin of Cullen is an important feature in views from the coast.

The Portgordon to Cullen Coast SLA extends inland to cover the Bin of Cullen and north-western parts of this Assessment Unit lies in the Spey Valley SLA. The landmark hills of Bin of Cullen and Meikle Balloch are valued for recreation.

12.2.1 *Potential cumulative issues*

The operational Edintore and the consented Aultmore and Lurg Hill wind farms are located in this Assessment Unit. The operational single and small groups of turbines are located in the adjacent *Upland Farmland* and the operational Hill of Towie wind farm, and its consented extension, also lies relatively close within the *Rolling Forested Hills.* Key cumulative landscape and visual issues include:

- Wind farm developments located on the majority of the lower, less pronounced upland plateaux and ridges within this landscape impacting on views from the adjacent *Upland Farmland*, potentially creating a dominant 'encircling' effect.
- Close inter-visibility of operational turbines sited in the adjacent *Upland Farmland* with larger turbines/wind farm developments located in nearby parts of the *Low Forested Hills* which could exacerbate the overly cluttered appearance of different turbine developments in views from the B9018 and from settlement in the Grange Crossroads area.

- Potential sequential cumulative visual effects on views from major roads including the A96 and the A95 through Moray and into Aberdeenshire where a number of operational wind farms and small groups of tall turbines are sited (the screening provided by ridges and hills on the Aberdeenshire/Moray border limits inter-visibility).
- Cumulative effects from popular walking routes and hill tops including from the Bin of Cullen, Meikle Balloch and Knock Hill where multiple wind farms and large turbines sited in both Moray and Aberdeenshire could be seen in close proximity.

12.2.2 *Constraints*

- The landmark hills of Bin of Cullen and Meikle Balloch – turbines sited on or close to these hills would detract from their form and the focus they provide in long views across eastern Moray. The SLA covering the Bin of Cullen recognises the scenic and recreational value of this distinctive hill.
- The relatively limited extent of the low hills and ridges which increases the potential for landscape and visual effects on adjacent smaller scale and well-settled landscapes such as the *Rolling Coastal Farmland*, the *Narrow Farmed Valleys*, the *Broad Farmed Valley* and the *Upland Farmland* Assessment Units.
- The western parts of this Assessment Unit which are important in providing a backdrop to Fochabers, the Spey valley and Gordon Castle designed landscape. The western hills of the Wood of Ordiequish are covered by the Spey Valley SLA.

12.2.3 *Opportunities*

- The simple, gently undulating landform, often uniform land cover, very sparse settlement and medium to large scale of the lower, less distinctive plateau-like hills of this landscape.

12.3 Sensitivity and guidance

There are variations in sensitivity across this Assessment Unit with the landmark hills of Bin of Cullen and Meikle Balloch being highly sensitive to wind turbine development while the lower forested plateaux, and especially those areas which do not provide the backdrop to the Spey valley, Fochabers and Gordon Castle GDL, being less sensitive. There would be a ***High*** sensitivity to turbines >150m and a ***High-medium*** sensitivity to turbines 100-150m high.

The limited extent of the less pronounced forested upland plateaux increases potential for significant landscape and visual effects to occur on adjacent settled and smaller scale landscapes. Cumulative effects with operational and consented wind turbines in this landscape and the adjacent *Upland Farmland* additionally increases sensitivity to larger turbines. Turbines <130m high would be likely to minimise effects on adjacent settled landscapes and cumulative effects with consented wind farms located in this Assessment Unit.

All turbines should be set well back into the interior of the more extensive areas of lower upland plateaux which would allow for adequate separation to occur thus minimising

intrusion on more settled and sensitive areas. Gentle undulations in landform could provide a degree of containment and reduce the perceived scale of large turbines. Turbines would need to be carefully sited to avoid cumulative effects with consented wind farms/turbines sited in this landscape and the adjoining *Upland Farmland*. Turbines should not be sited on or close-by the landmark hills of Bin of Cullen and Meikle Balloch. They should also be sited to avoid significant intrusion on the designed landscape of Gordon Castle, on the Spey Valley SLA and on the setting of Fochabers.

12.3.1 *Smaller turbines <100m high*

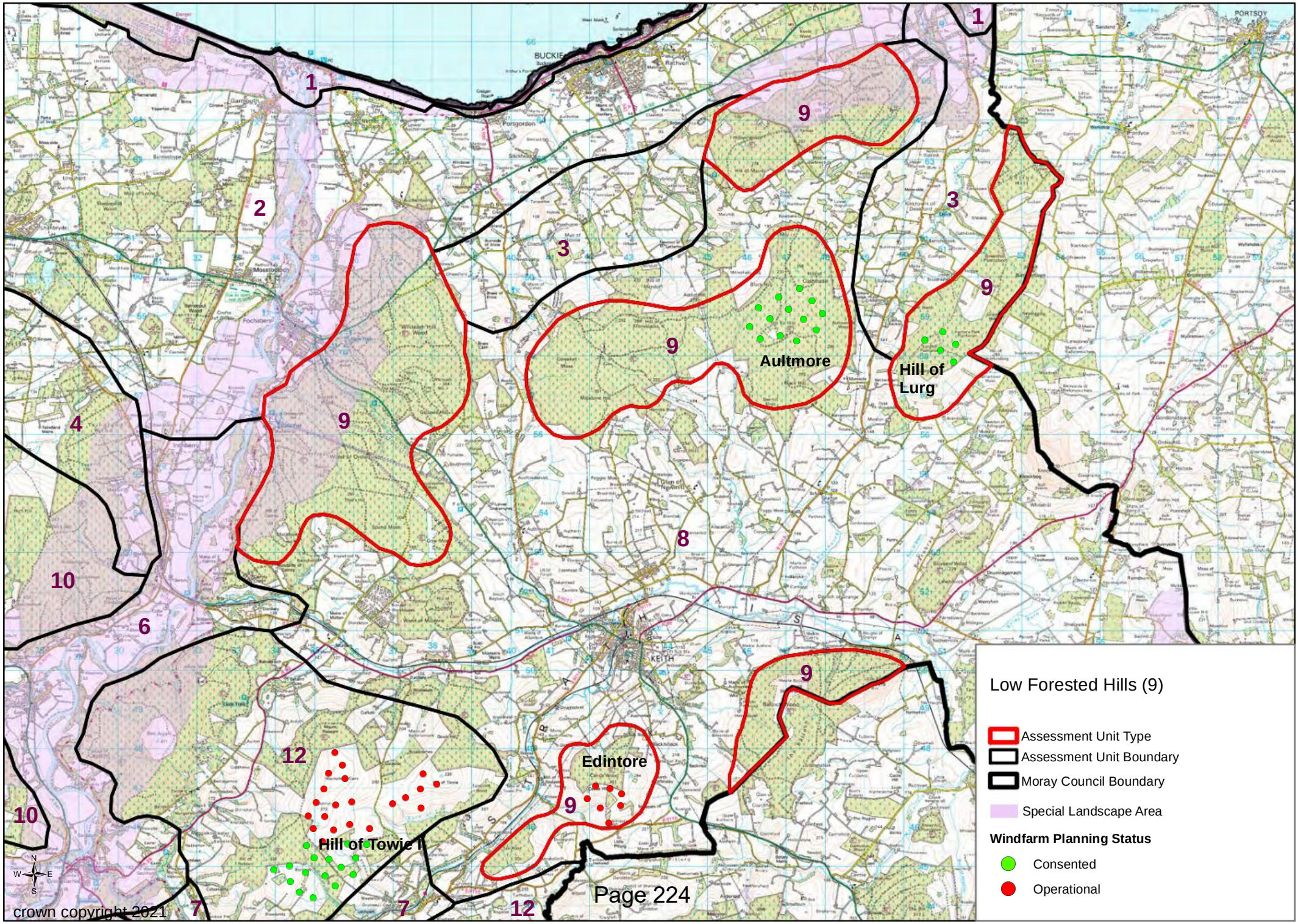
Smaller turbines are most likely to be associated with farmland lying at the transition with the *Upland Farmland*. Smaller turbines would be likely to have less of an effect on character and views within the more settled *Upland Farmland* although care should be taken to minimise cumulative effects with consented larger turbines located in parts of the *Low Forested Hills*. Smaller turbines should also be sited to avoid intrusion on key views of the landmark hills of Bin of Cullen and Meikle Balloch as even smaller turbines sited nearby could detract from their form and prominence.

Operational wind turbines within the adjacent 'Upland Farmland' increases potential for significant cumulative effects to arise with wind farm development in the 'Low Forested Hills'

This upland landscape forms generally low and even forested skylines to adjacent more settled landscapes, such as the 'Coastal Farmland with Rolling Hills'

Occasional 'landmark' hills occur within this landscape and include the Bin of Cullen

Whiteash Hill Wood provides an immediate backdrop to Gordon Castle designed landscape, Fochabers and the Spey Valley SLA.



13 UPLAND MOORLAND AND FORESTRY (10)

13.1 Introduction

The *Upland Moorland and Forestry* Assessment Unit occurs in a single area within Moray. This landscape merges gradually with the *Open Rolling Uplands* to the south-west which forms higher and generally more well-defined hills than the more subtly undulating plateau of the *Upland Moorland and Forestry*. The assessment considers the sensitivity of this landscape to larger turbines >100m high in detail, providing summary guidance only for smaller typologies <100m.

13.1.1 *Operational/consented wind farms*

This landscape accommodates the operational Rothes I and II and Hill of Glaschyle wind farms and the consented Meikle Hill, Kellas, Clash Gour and Rothes III wind farms. The operational Berry Burn and Paul's Hill wind farms, and the consented Paul's Hill II and Berry Burn II extensions, are located to the south within the adjacent *Open Rolling Uplands*.

13.2 Summary description and assessment

The *Upland Moorland and Forestry* comprises a gently undulating plateau-like landform with smooth even slopes although some more defined and higher hills are present on the outer edges of this Assessment Unit. This landscape is predominantly large scale, sparsely settled and covered with a simple pattern of coniferous forestry and moorland although some smaller scale farmed and settled areas are present on the outer fringes of this landscape in the upper Lossie valley and Upper Knockando areas. Visibility of the interior of these uplands is restricted from surrounding roads and settlement but the outer edges of parts of this landscape are prominent from the coastal plain of Moray and from the Spey valley. While the skyline of this upland area is generally even, the distinctive hills of Mill Buie and Brown Muir Hill form landmark features in views from the north. Carn na Cailliche and Hunt Hill on the southern edge of these uplands abutting the Spey valley are less well-defined but important in the containment they provide to the extensive operational wind farm development sited within the lower-lying upland core in the eastern part of this Assessment Unit.

A small part of the Spey Valley SLA extends into the southern part of this landscape in the Upper Knockando area. The *Findhorn Valley and Wooded Estates* SLA also covers a small part of this landscape in the west. The majority of this Assessment Unit is not covered by landscape designations or other formally recognised landscape interests although the Dava Way, a long-distance recreational route, is partially aligned through this landscape.

13.2.1 *Potential cumulative issues*

A large number of operational and consented wind farms already strongly influence character and views in this landscape.

Key cumulative landscape and visual issues include:

- Potential sequential and simultaneous views of multiple wind farm developments visible on the long, low skylines of this landscape seen in views from the *Coastal Farmland* and the *Rolling Farmland and Forest* to the north.
- Potential effects on views from the A95 and from settlement within the *Broad Farmed Valley* (the Spey valley) where the Paul's Hill I and Hill of Towie wind farms are already visible and where the consented Paul's Hill II, Clash Gour, and particularly, the consented Rothes III wind farms will significantly increase intrusion from parts of this route. Any additional wind turbine development on the prominent south-eastern edge of these uplands which abuts the Spey valley would be likely to significantly exacerbate cumulative impacts and could result in an overwhelming effect on its character and views.
- Sequential and simultaneous views from the A940 which provides a scenic approach to Moray over Dava Moor. The operational Hill of Glaschyle wind farm is visible from rare open spaces within the more wooded section of this route near the Findhorn valley. The consented Cairn Duhie wind farm, which lies close to the Moray boundary in Highland Council area, will be more widely and prominently visible as it is located on the edge of the open Dava and Lochindorb Moors. Additional development, and particularly wind farms comprising larger turbines, sited on the small, wooded hills which lie on the western part of this landscape could result in significant cumulative effects on this route and also on the Findhorn valley.
- Increases in the extent and prominence of wind farm development seen on skylines above the upper Lossie Valley in the Kellas to Dallas area. Operational and consented wind farms will create a near continuous band of development seen in close proximity on the skyline from this settled valley. Further large wind turbines sited closer to the valley, introducing new visibility of turbines to the west of Dallas and/or filling gaps between operational and consented wind farms would significantly exacerbate effects on character and views.

13.2.2 *Constraints*

- The extensive operational and consented wind farms already located in this Assessment Unit which severely limits opportunities for further development to be located whilst minimising effects on adjacent more sensitive landscapes and on views.
- The hills and ridges on the outer edges of this upland landscape which form the backdrop to more settled and smaller scale farmed areas lying on the fringes of this Assessment Unit including the diverse upper Lossie valley to the south-west of Dallas and the Upper Knockando area.
- The hills and ridges on the outer edges of this landscape which form the backdrop to the smaller scale and sensitive Findhorn and Divie valleys, Glen Rothes and the Lossie valley between Kellas and Dallas.
- Views from the A940 which provides a scenic approach to Moray over Dava Moor (see also the potential cumulative effects listed above).
- The well-defined steep-sided hill of Brown Muir which forms a landmark feature seen widely across the *Coastal Farmland* to the north.

- The landmark hill of Mill Buie west of Dallas which is important in screening the consented Clash Gour (and other more distant operational wind farms) in views from settlement and roads.
- The hill of Carn na Cailliche, which although not as well-defined or prominent as Brown Muir or Mill Buie, plays an important role in containing wind farm development sited in the core of the *Upland Moorland and Forestry* in views from the Spey valley. While this containment will be breached to some degree by the consented Rothes III wind farm, further development sited on or nearby this hill would significantly increase visual intrusion.
- Views from the minor road between Dallas and Knockando, a scenic route popular with leisure drivers and cyclists. Operational wind farms are already visible from this route and the consented developments of Meikle Hill, Clash Gour, Paul's Hill II and Rothes III will comprise substantially larger and closer turbines. Further development located in the remaining open ground closer to this route would exacerbate the sense of dominance likely to be experienced.
- The need to minimise effects of wind farm development seen on immediate and sensitive skylines above the *Broad Farmed Valley*. The well-settled nature of the Spey valley and its popularity with tourists, due in part to its associations with whisky production, increases visual sensitivity.

13.2.3 *Opportunities*

- The simple landform and large scale of the interior plateau areas and the sparsely settled nature of much of this landscape which reduces susceptibility.
- The combination of hilly landform and dense forest which would be likely to limit visibility of turbines located in the western part of this landscape from roads and settlement in the adjacent *Rolling Farmland and Forest*.

13.3 Sensitivity and guidance

While the predominantly large scale and simple landcover of this Assessment Unit reduces susceptibility to larger wind turbines this upland plateau is not extensive and thus lies relatively close to smaller scale and more settled valleys. Importantly, the extent of operational and consented wind farms already located in these uplands severely limits opportunities to site further wind energy development while minimising landscape and visual effect on adjacent more sensitive landscapes. The outer edges of these uplands adjoining more settled landscapes, and especially the landmark hills of Mill Buie, Carn na Cailliche, Hunt Hill and Brown Muir, are particularly sensitive in this respect.

There would be a ***High*** sensitivity to turbines >150m and a ***High-medium*** sensitivity to turbines <150m.

Turbines should be set well back into the interior of these uplands, avoiding significant intrusion on the ridges and hills which form prominent skylines to the adjacent smaller scale settled *Rolling Farmland and Forest*, *Narrow Wooded Valleys* and the *Broad Farmed Valley*. Turbines should not be sited on, or close-by, the landmark hills of Mill Buie, Carn na Cailliche, Hunt Hill and Brown Muir. Cumulative effects on views from the minor road between Dallas and Knockando should be minimised by siting turbines away

from the diverse moorland and regenerating native woodland which provides an attractive feature particularly seen to the west of this route. Significant cumulative effects on the Dava Way and on the A95 and the B9102 should also be avoided.

13.3.1 *Repowering of operational wind farms*

There may be opportunities to minimise effects on surrounding more sensitive landscape and visual receptors by repowering well-sited operational wind farms located in the less sensitive interior of these uplands.

13.3.2 *Smaller turbines*

There is unlikely to be a significant demand for smaller typologies (turbines <100m high) within this Assessment Unit. Some limited opportunities exist for smaller turbines <50m to be sited on lower hill slopes at the transition with the *Broad Farmed Valley* and the *Rolling Farmland and Forest* where they should be set well away from operational wind farms and visually associated with more settled and farmed hill fringes. There are greater opportunities to site turbines <35m high in these areas due to their better scale relationship to adjacent settled areas and to minimise cumulative effects with larger turbines within operational wind farms.

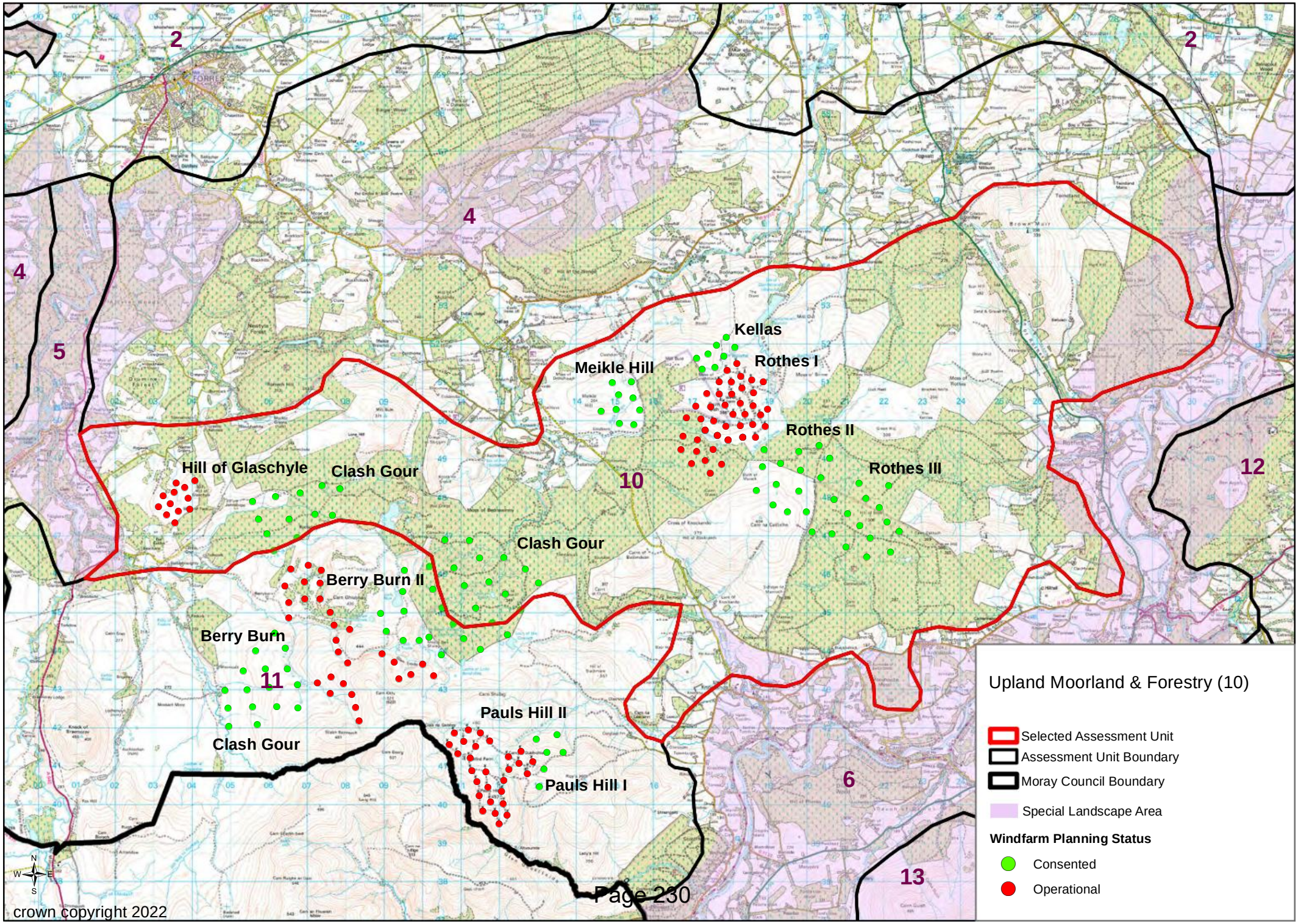
The 'landmark' hill of Carn na Cailliche is important in visually containing the Rothes wind farm development in views from the Spey Valley- the consented Rothes III wind farm will breach this containment in some views

Forestry and heather moorland on lower slopes either side of the minor road between Knockando and Dallas

The Rothes I and II wind farm is seen in close proximity to the Lossie Valley near Dallas and occupies a generally low, even section of skyline between more pronounced hills.

The 'landmark' hill of Brown Muir forms a prominent feature seen extensively across the settled 'Coastal Farmland' of Moray.

Upland Moorland and Forestry


2
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Kellas
Rothes I
Meikle Hill
Rothes II
Rothes III
Hill of Glaschyle
Clash Gour
Clash Gour
Berry Burn II
Berry Burn
Clash Gour
Pauls Hill II
Pauls Hill I
Upland Moorland & Forestry (10)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
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14 OPEN ROLLING UPLANDS (11)

14.1 Introduction

The *Open Rolling Uplands* Assessment Unit occurs in a single area within Moray. It extends into neighbouring Highland to the west covering an extensive swathe of low-lying basins and hills. This landscape merges gradually with the subtly undulating plateau of the *Upland Moorland and Forestry* to the north and north-east, forming higher and generally more well-defined hills. This assessment considers the sensitivity of the upland landscape of the *Open Rolling Uplands* (11) within Moray to larger turbines >100m high in detail, providing summary guidance only for turbines below this height.

14.1.1 *Operational/consented wind farms*

The operational Berry Burn and Paul's Hill wind farms are located within this Assessment Unit. The consented Paul's Hill II, Berry Burn II and part of the Clash Gour wind farms also lies in this landscape. The operational Rothes I and II and Hill of Glaschyle wind farms are located within the adjacent *Upland Moorland and Forestry*. The consented Meikle Hill, Kellas and Rothes III wind farms are sited close to the Rothes I and II wind farm in the *Upland Moorland and Forestry*.

14.2 Summary description and assessment

The *Open Rolling Uplands* form an upland plateau of rounded hills, some of these are particularly well-defined such as the Knock of Braemoray and Roy's Hill, and the broad low-lying basin of Moidach More. Smaller, more complex knolly hills and lochans occur to the north and north-east of Carn Kitty. This landscape has a simple land cover of grass and heather moorland with semi-improved pastures on lower hill slopes and areas of moss within low-lying basins. It is sparsely settled with small farms associated with the shallow valleys of the River Divie and Dorback Burn on northern and western fringes. Areas of diverse regenerating native woodlands and heather are a feature of these valleys. The operational wind farms of Paul's Hill and Berry Burn are sited within this landscape. Although this is a very sparsely settled area with only limited views possible into the interior uplands and basins from roads and settlement in the surrounding area, the landmark hills on the fringes of these uplands form key foci in views from surrounding settlement and roads.

This Assessment Unit is not covered by any landscape designations or other formally recognised landscape interests within Moray although the wetland of Moidach More is important for nature conservation and the Dava Way, a long-distance recreational route, is partially aligned through this landscape. The Drynachan, Lochindorb and Dava Moors SLA in Highland covers much of the *Open Rolling Uplands* which extend to the south and south-west of Moray.

14.2.1 *Potential cumulative issues*

Extensive operational and consented wind farm development is located in this Assessment Unit and has/will have a significant influence on landscape character and views. Key cumulative landscape and visual issues include:

- Potential effects on views from the A95 and from settlement within the *Broad Farmed Valley* (the Spey valley) where the Paul's Hill I and Hill of Towie wind farms are already visible. The consented Paul's Hill II, Clash Gour and Rothes III wind farms will significantly increase intrusion from parts of this route and any additional development in this landscape could contribute to cumulative impacts particularly if sited closer to the south-eastern edge of the *Open Rolling Uplands* and/or if featuring large turbines.
- Large wind turbines sited closer to the Dava Way exacerbating the sequential cumulative effects of operational and consented wind farms.
- Sequential and simultaneous views from the A940 which provides a scenic approach to Moray over Dava Moor and from the popular Lochindorb area in Highland. Operational and consented wind farms located in Moray are already visible and further development sited in the western part of this Assessment Unit could result in significant cumulative effects.

14.2.2 *Constraints*

- The extensive operational and consented wind farms already located in this Assessment Unit which severely limits opportunities for further development to be located whilst minimising effects on adjacent more sensitive landscapes and on views.
- The more defined steep-sided hills of Knock of Braemoray and Carn Biorach which both form prominent landmarks seen widely across Lochindorb and Dava Moors and from the A940 which forms a key scenic approach to Moray – these hills are also important in providing some screening of the operational Berry Burn wind farm and the consented Clash Gour wind farm in views from the west.
- Roy's Hill, which forms a landmark feature seen from the Spey valley on the southern edge of this Assessment Unit and which also provides some visual containment of the operational Paul's Hill wind farm and nearby consented wind farms.
- The smaller scale valleys of the River Divie and the Dorback Burn which feature farmland, settlement and diverse native woodlands and which are highly visible from the A939/A940.
- Cumulative effects on views from the Dava Way recreational route between Grantown and Forres and from the Speyside Way and on views from the A940 when approaching Moray.
- The wider landscape setting and character of Lochindorb and also views from the B9007 which comprises a scenic route over remote moorland. Both these features lie in the *Drynachan, Lochindorb and Dava Moors* SLA which covers the area to the south and south-west of this Assessment Unit in Highland.
- Views from the minor road between Dallas and Upper Knockando, a hill pass popular with motorists and cyclists, where additional wind energy development sited closer to this road could create an overwhelming effect.
- The well-settled nature of the adjacent Spey valley, its popularity with tourists and the SLA designation which applies to this landscape.

14.2.3 *Opportunities*

- The simple landform and large scale of the interior plateau areas which benefit from some screening by higher hills on the periphery of this Assessment Unit.

14.3 Sensitivity and guidance

While the predominantly large scale and simple landcover of this landscape reduces susceptibility to larger wind turbines, this upland plateau lies close to the smaller scale and more settled valley of the Spey and to sensitive landscapes in Highland. Operational and consented wind farms are/will be a key characteristic of much of this landscape. The less sensitive interior parts of this landscape are largely occupied by these wind farms and opportunities for additional development would be more likely to be confined to more peripheral areas resulting in a greater degree of intrusion on adjacent more sensitive landscapes.

This landscape has a ***High*** sensitivity to turbines >150m and a ***High-medium*** sensitivity to turbines 100-150m.

Turbines should be set well back into the core of upland areas, avoiding being sited on or nearby the landmark hills of Knock of Braemoray, Carn Biorach and Roy's Hill. Very small extensions to existing wind farms are most likely to minimise effects on surrounding more sensitive landscapes and on views. Significant exacerbation of already significant cumulative effects on receptors using the Dava Way and the minor Kockando to Dallas road should be avoided by siting turbines well back from these routes and/or selecting fewer and smaller turbines..

14.3.1 *Repowering of operational wind farms*

Repowering of operational wind farms located within the interior of these uplands (and therefore more distant from key views from roads and settlement) is likely to provide most scope for accommodating larger turbines whilst minimising landscape and visual effects.

14.3.2 *Smaller turbines*

Demand for turbines <100m high may be focussed on the Divie and Dorback valleys. Turbines >50m high would appear large if located in these valleys and cumulative effects could occur with larger turbines within operational and consented wind farms. Turbines <35m would be more likely to minimise landscape and visual effects.

The landform is more complex in the north-east where small knolls, deeply incised valleys and lochans are present.

The operational Paul's Hill wind farm is partially contained by Roy's Hill in views from the Spey Valley.

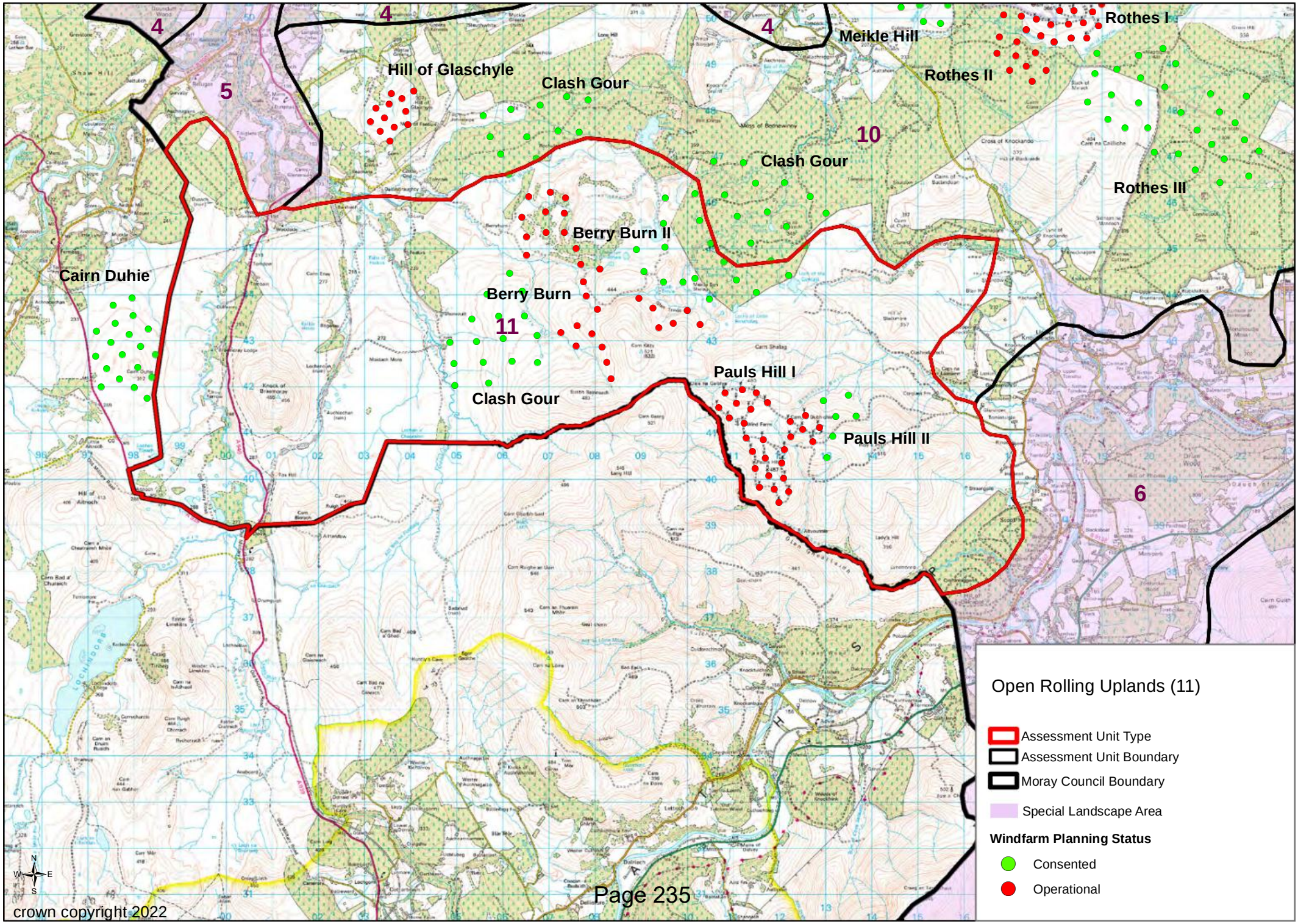
These uplands are open in comparison with the more forested 'Upland Moorland and Forestry' seen in the backdrop

A low-lying boggy moor forms the watershed of the River Divie and is surrounded by gently undulating upland ridges

Bright green improved pastures stand out amidst moorland and bog vegetation within the Divie and Dorback Burn valleys.

The Knock of Braemoray forms a focus in views from the A940 and also screens views of wind farm development

Open Rolling Uplands



15 ROLLING FORESTED HILLS (12)

15.1 Introduction

The *Rolling Forested Hills* Assessment Unit comprises three areas of rolling hills lying to the east of the Spey valley additionally bounded by the incised glens of the Isla and Rinnes. The detailed assessment considers sensitivity to larger turbines >100m high providing summary guidance only for smaller turbines.

15.1.1 *Operational/consented wind farms*

The operational Hill of Towie wind farm and its consented extension is located in this landscape. A number of smaller single turbines are located on the north-west facing hill slopes of the upland area centred on the Hill of Towie summit (339m). A group of three small turbines are also located in the Mulben area.

15.2 Summary description and assessment

This landscape comprises often prominent, steep-sided rounded hills cut by long, well-defined valleys. Ben Aigan is the most distinctive of these hills with its conical quartzite summit protruding above forested slopes. These hills are broadly patterned with coniferous forestry and grass and heather moorland. Upper hill slopes at the transition with the *Narrow Farmed Valleys* feature small coniferous woodlands and shelterbelts and more strongly enclosed pastures. In places, forestry extends down onto lower slopes to entirely fill narrow valleys. Small farms are located high on the upper slopes of these hills, often located next to small tributary valleys and accessed by narrow roads. The western parts of these hills provide the backdrop to the Spey valley.

SLA designated areas cover much of the western parts of this landscape including Ben Aigan and the hills which form part of the Spey valley. The area to the west of Dufftown and Glen Rinnes also lies in the Ben Rinnes SLA. The SLA designations recognise the scenic qualities and recreational value of these areas.

15.2.1 *Potential cumulative issues*

The operational Hill of Towie wind farm lies in the northern area of this Assessment Unit. Smaller operational wind turbines located on north-west facing hill slopes below the Hill of Towie wind farm, the operational Edintore wind farm and small groups of smaller turbines in the Mulben area in the *Low Forested Hills* and *Upland Farmland* also increase potential for cumulative impacts to arise.

Key cumulative landscape and visual issues include:

- Close inter-visibility of operational single small turbines and wind farms sited in this landscape and the adjacent *Upland Farmland* and *Low Forested Hills* where additional wind energy development could exacerbate visual clutter and domination of turbines in views from the A95, B9014, B9103 and from settlement.
- Cumulative effects on views from popular walking routes and hill tops including from Ben Rinnes, Little Conval and Ben Aigan.
- Extensions to operational wind farms and new developments which could dominate immediate skylines above the *Narrow Farmed Valleys* (e.g. the upper

Isla valley and Glen Rinnes) or potentially lead to a ‘corridor’ effect of development on either side of these small scale valleys experienced from roads and settlement.
- Differences in size, design and rotational speed of turbines, particularly where small turbines are located close to large turbines within wind farms.

15.2.2 *Constraints*

- The limited extent of the upland areas lying within this Assessment Unit which increases susceptibility in relation to effects on surrounding smaller scale settled landscapes.
- The immediate skylines these rolling hills provide to the adjacent small scale and settled *Narrow Farmed Valleys* which would be sensitive to intrusion by wind turbines sited on the outer edges of the hills.
- The backdrop provided by these hills to historic built features such as castles, and estate houses, and their associated designed landscapes, and to the planned settlement of Dufftown located in the *Broad Farmed Valley* and the *Narrow Farmed Valleys*.
- The Spey valley, including the settlement of Charlestown of Aberlour, which is backed by the steep wooded hill slopes of this landscape.
- The distinctive form of Ben Aigan which forms a highly visible landmark feature widely seen across central and eastern Moray and which is a focus for walkers and cyclists.
- The well-defined steep-sided hills of Little Conval, located in the adjacent *Open Uplands with Steep Slopes*, and Scaut Hill which are both important in forming part of the setting to Dufftown.
- Potential cumulative effects with the operational Hill of Towie wind farm, and its consented extension, the nearby operational Edintore wind farm and the operational Dorenell wind farm seen sequentially from roads and footpaths including cumulative effects from recreational routes on Ben Aigan.
- Views from well-used paths on Ben Rinnes where development in the southern parts of this landscape would appear close and could result in cumulative effects, particularly with the Dorenell wind farm.

15.2.3 *Opportunities*

- Small areas of gently undulating hill plateau close to the Hill of Towie wind farm where there may be potential to locate additional large wind turbines to appear as a small extension to this development whilst minimising effects on adjacent smaller scale valleys.
- Upland areas close to the boundary to Aberdeenshire where there may be scope to locate turbines to fit with the scale and character of this more settled area.

15.3 Sensitivity and guidance

The southern and western parts of this Assessment Unit are covered by SLA designations in recognition of the contribution made by these rolling forested hills to the scenic qualities and recreational value of these landscapes. These qualities, together with the relatively limited extent of these upland areas, increase sensitivity to larger

wind turbines. The setting these hills provide to the adjacent *Narrow Farmed Valleys* AU where upper hill slopes, hills and ridges form immediate skylines and backdrops to these smaller scale and well-settled landscapes, also increases sensitivity. There would be a ***High*** sensitivity to turbines >150m and a ***High-medium*** sensitivity to turbines 100-150m.

The upland area which accommodates the Hill of Towie wind farm is of reduced sensitivity because it is more extensive and lies further from formally valued landscapes such as the Spey valley and Ben Rinnes. There may be potential for small extensions to the operational Hill of Towie wind farm provided these are located in the core of the upland area and avoid significant additional intrusion on the adjacent sensitive *Narrow Wooded Valley* of the upper Isla and the Fiddich valleys.

All turbines >50m should avoid being sited on, or close-by, the landmark hill of Ben Aigan or the smaller, but locally prominent, Little Conval and Scaut Hills. The wooded slopes which form the backdrop to Charlestown of Aberlour and the Spey valley should also be avoided (and where any development would be seen in close proximity from popular recreational routes on Ben Rinnes). Turbines of this size should also be sited away from the south-eastern part of this Assessment Unit which is more settled and farmed and has a smaller scale. The presence of Auchindoun Castle and the need to protect its setting is an added constraint in this area.

15.3.1 *Repowering of operational wind farms*

Turbines within the operational Hill of Towie I are 100m high and the consented extension to this wind farm comprises turbines 125m high. This wind farm is sited in an upland area which is of limited extent and this increases susceptibility to turbines >150m high even if they replaced the operational Hill of Towie I turbines which are sited more into the interior of these uplands. A reduction in the number of turbines, and changes to the layout of the operational wind farm to ensure all repowered turbines lie within the less susceptible interior part of these uplands, and where undulating moorland and forestry could provide a degree of screening of turbines bases, could minimise their apparent scale and intrusion from surrounding landscapes. This wind farm is already close to the limit in terms of its fit with landscape scale and its proximity to, and effects on, adjacent more sensitive landscape and visual receptors.

15.3.2 *Smaller turbines*

Smaller turbines <50m would fit with the scale and generally simple landform of this landscape although potential cumulative effects with operational wind farms sited in this landscape and within the adjacent *Upland Farmland* will be a constraint in some areas. Cumulative effects between different designs and sizes of operational turbines on the hill slopes north-west of the Hill of Towie wind farm, seen from the A95 and from settlement in this area, are a key constraint to additional development in this area. Less complex lower hill slopes in the parts of this Assessment Unit set well away from the Hill of Towie wind farm may however offer opportunities to site smaller turbines where they could be visually associated with farms.

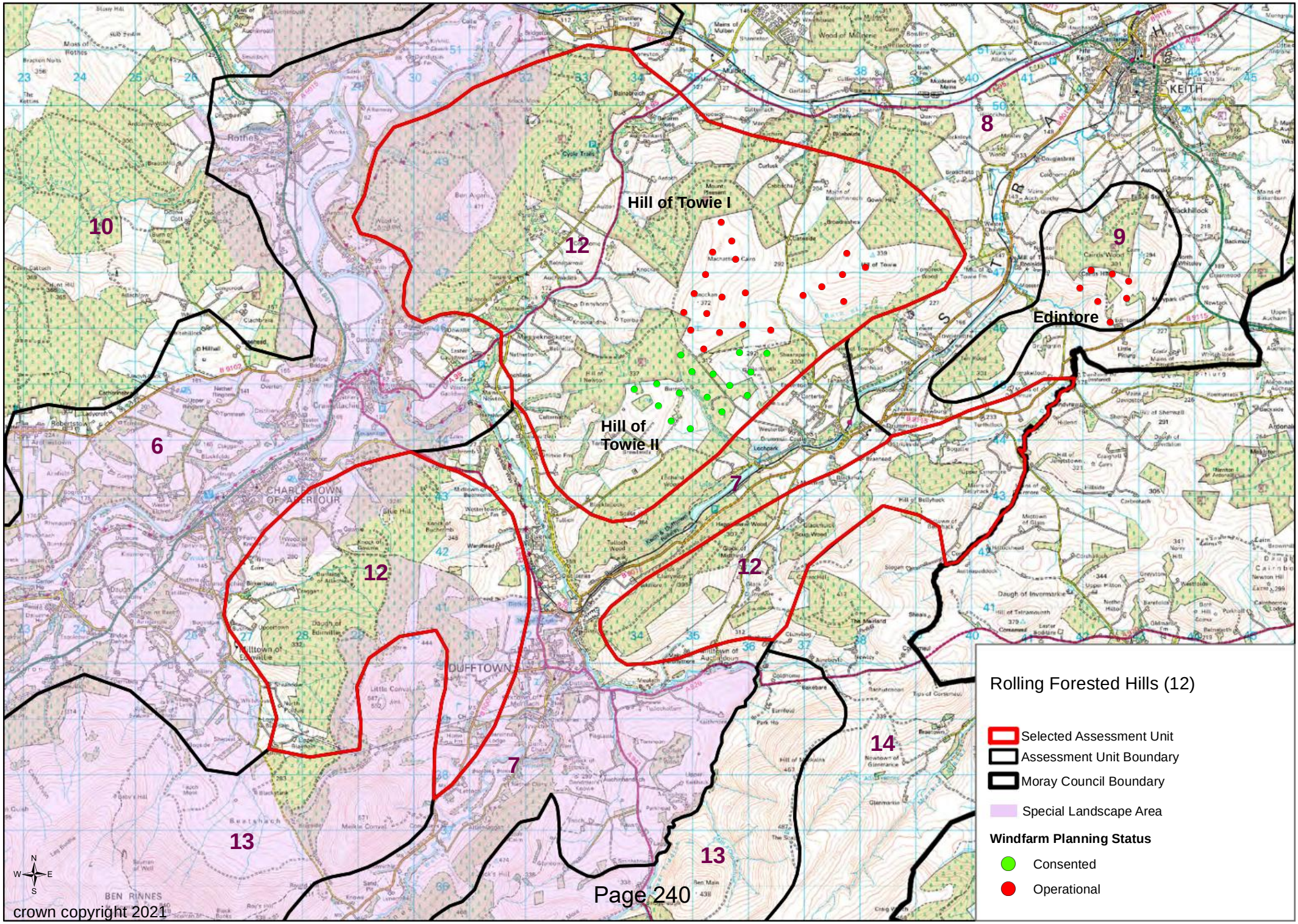
Existing wind farm development is sited within this landscape

These hills form the backdrop to Dufftown and a number of smaller scale settled valleys

The 'landmark' hill of Ben Aigan seen from the Spey Valley – this hill is popular with walkers and cyclists

Lower hill slopes and valleys accommodate small farms

Rolling Forested Hills



16 OPEN UPLANDS WITH STEEP SLOPES (13)

16.1 Introduction

These uplands are centred on Ben Rinnes, the highest hill in Moray. The assessment considers the sensitivity of this upland landscape to larger development typologies (turbines >50m high) in detail, providing summary guidance only for smaller typologies.

16.1.1 *Operational/consented wind farms*

There are no operational or consented wind farm or turbine developments located in this Assessment Unit. The extensive operational Dorenell wind farm is located in the adjacent *Open Uplands with Settled Glens* close to the boundary of this landscape and is seen in relatively close proximity (7km) from Ben Rinnes. The operational wind farms of Rothes I and II, Berry Burn, Hill of Towie and Paul's Hill, and the consented Paul's Hill II, Berry Burn II, Clash Gour and Rothes III and Hill of Towie II wind farms, located in other upland areas within Moray, are visible from hill summits and ridges from within this AU within approximately 10-17km distance. The consented Garbet wind farm is located in the adjacent *Open Uplands with Settled Glens* Assessment Unit and would be visible from Ben Rinnes at a distance of approximately 12km.

16.2 Summary description and assessment

The *Open Uplands with Steep Slopes* forms two relatively narrow areas of rolling hills separated by Glen Rinnes. Steep slopes extend up to narrow ridges or more complex summits and provide a dramatic backdrop and setting to the small-scale *Narrow Farmed Valleys* and the *Broad Farmed Valley*. The landscape scale of the highest uplands in this Assessment Unit is large but the topographical relief is much lower to the north and where there are more complex landforms and small foothills at the transition with these valleys. This landscape has a relatively simple land cover of heather moorland and upland grass with some conifer forest and shelter woods along the lower slopes. It is sparsely settled with occasional small farms associated with the narrow glens which extend into the hills.

The majority of this Assessment Unit is covered by the Ben Rinnes SLA in recognition of the dramatic scenery of this upland landscape, its little modified character and its popularity for recreation and tourism. Part of this Assessment Unit abuts the Cairngorms National Park.

16.2.1 *Potential cumulative issues*

A large number of wind farm developments (both operational and consented) are/will be visible from the summit of Ben Rinnes and other hills and ridges in this Assessment Unit.

Key cumulative landscape and visual issues include:

- Views from the top of Ben Rinnes and other smaller hills in this Assessment Unit which are popular with walkers and cyclists and where any development located

in these uplands could create a dominant effect in combination with the large array of operational and consented wind farm development that is/will be visible.

- The incremental diminution of the qualities of wildness associated with Moray's landscapes – this Assessment Unit is important in being the only upland area remaining in Moray where there are no wind farm developments either built or consented.
- Potential cumulative effects on views from the neighbouring *Broad Farmed Valley* (Spey valley) where a large array of operational and consented wind farm development is/will be visible.

16.2.2 *Constraints*

- The steep slopes and narrow ridgelines of these uplands which contain the *Broad Farmed Valley* of the Spey and the *Narrow Farmed Valley* of Glen Rinnes and also overlook the Braes of Glenlivet within the Cairngorms National Park to the south - larger typologies located in these areas would dominate the smaller scale of these adjacent well-settled landscapes.
- The role played by the undeveloped eastern flank of Glen Rinnes, which currently provides a visual buffer between the operational Dorenell wind farm and the smaller scale *Narrow Farmed Valley* of Glen Rinnes.
- The higher hills in the southern part of these uplands, including hills such as Cairn Muldonich, which provide screening of the operational Dorenell wind farm from Glenlivet.
- The lower relief and more complex landform associated with smaller scale foothills and lower hills to the northern end of this Assessment Unit and at the transition with the *Broad Farmed Valley* and *Narrow Farmed Valley*.
- The rugged profile, more complex landform and the prominent 'stand-alone' setting of Ben Rinnes, Meikle Conval and Little Conval, which together form a group of landmark hills which are highly visible and recognisable features over a wide area.
- The setting of the planned village of Dufftown which is in part formed by these upland areas.
- Views from roads such as the A95, A941 and B9009 – routes which are often used by tourists - and views from Ben Rinnes and other hills popular with walkers.
- Effects on the sense of wildness that can be experienced in this little developed upland area and the valuable contrast it provides with other upland areas in Moray where wind farm development is located.
- Cumulative landscape and visual effects with other wind farms and particularly the operational Dorenell and the consented Garbet wind farms which are both located relatively close-by in the adjacent *Open Uplands with Settled Glens*.
- The SLA which covers this landscape and recognises the important scenic and natural qualities of these uplands and their popularity for recreation and with visitors from outside Moray.

16.2.3 *Opportunities*

- Lower slopes at the transition with the adjacent *Broad Farmed Valley* and *Narrow Farmed Valley* where smaller turbines <50m could potentially be accommodated.

16.3 Sensitivity and guidance

While the large scale of much of this landscape reduces susceptibility to larger turbines, the steep and often dramatic slopes, ridges and summits of these uplands increase susceptibility and are particularly important in providing the backdrop and setting to the smaller scale settled valleys of the Spey, Glenlivet and Glen Rinnes. The value associated with this landscape contributes to its high sensitivity. This landscape has a ***High*** sensitivity to turbines >50m.

16.3.1 *Smaller turbines*

There is unlikely to be significant demand for smaller turbines <50m within these sparsely settled uplands. Some limited opportunities exist for smaller turbines to be located within sparsely settled glens, across more gentle lower slopes and at the transition with the *Broad Farmed Valley* with turbines <35m high likely to relate better to the scale of small farms, woodlands and farmland. Locating smaller turbines in these lower-lying settled areas would minimise cumulative landscape and visual effects with larger wind turbines sited within the core of the uplands by establishing a clear siting rationale and reducing close inter-visibility. Care would need to be taken to site smaller turbines to avoid impacting on the setting and key views to the landmark hills of Ben Rinnes, Meikle Conval and Little Conval.

Detailed guidance on siting smaller wind turbines is set out in Appendix D.

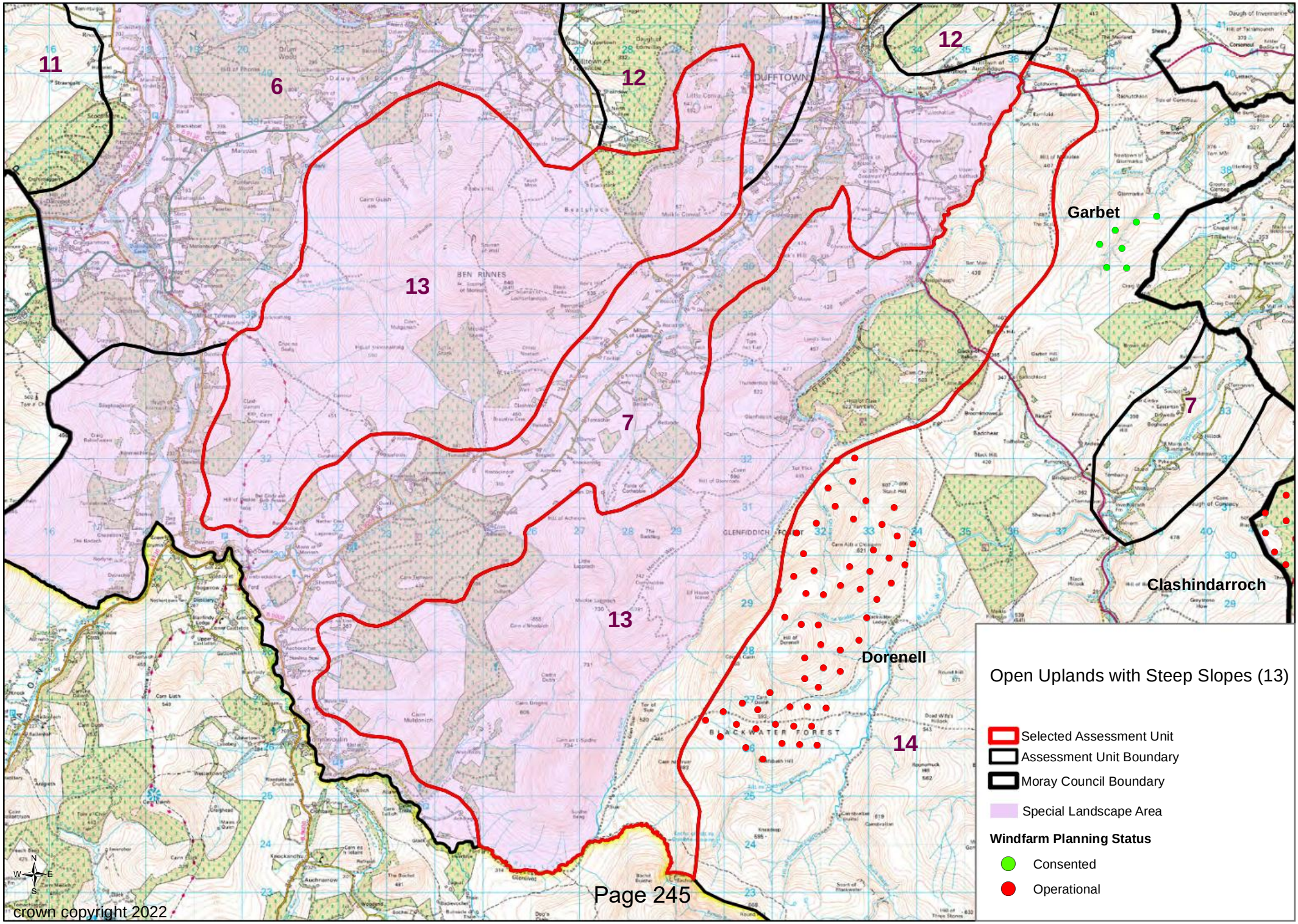
Ben Rinnes – an easily recognisable 'landmark hill' which is highly visible - the summit is also a popular viewpoint

Steep slopes enclose the valley of Glen Rinnes forming a pronounced edge and also screening the operational Dorenell wind farm to the east.

These uplands form the backdrop to small valleys including Glenlivet – the southern part of this AU adjoins the Cairngorms National Park

Ben Rinnes is prominent from the Spey valley and contributes to the scenic quality of this landscape.

Open Uplands with Steep Slopes



17 OPEN UPLANDS WITH SETTLED GLENS (14)

17.1 Introduction

The *Open Uplands with Settled Glens* lie in the south-eastern corner of Moray. The assessment considers the sensitivity of this predominantly upland landscape to larger turbines >100m in detail providing summary guidance only for turbines <100m.

17.1.1 *Operational/consented wind farms*

The operational Dorenell wind farm is located in this Assessment Unit and is prominent in views from the A941. The consented Garbet wind farm is also located in the northern part of this Assessment Unit. The operational Clashindarroch and Kildrummy wind farms located in neighbouring Aberdeenshire, and other more distant wind farms in Moray, are visible from the hill summits and ridges in this Assessment Unit.

17.2 Summary description and assessment

The *Open Uplands with Settled Glens* extends across the lower rounded hills which form the eastern boundary of Moray. It includes the elevated shallow bowl of the Cabrach contained by an arc of hills and the sparsely settled upper reaches of the Deveron which flows through a narrow glen. Steeper slopes between Black Water Glen and Glen Fiddich create a transition between this landscape and the neighbouring *Open Uplands with Steep Slopes* which is generally characterised by higher and more pronounced hills.

These uplands lie next to rounded hills with a similar elevation lying to the north-east within Aberdeenshire although these adjacent hills are forested, contrasting with the open moorland cover of the *Open Uplands with Settled Glens*. The smooth, gently rolling landform of the *Open Uplands with Settled Glens* is accentuated by low grass and heather cover, interspersed by occasional small conifer woodlands above improved pastures on lower slopes. Dispersed farms are situated on the lower slopes of the broad basin of the Cabrach with isolated estate buildings and farms also located within the narrow glens which cut into the hills. The A941 passes through this area, entering Moray across the dramatic high pass of the Cabrach.

This landscape is not covered by a landscape designation although it lies close to the Ben Rinnes SLA and also borders the Cairngorms National Park.

17.2.1 *Potential cumulative issues*

Operational wind farm development has a strong influence on character and views in this landscape. Key cumulative landscape and visual issues include:

- Potential sequential and simultaneous views of multiple developments along the skyline around the 360-degree bowl of the Cabrach seen from the A941, particularly if development extended onto lower hill slopes either side of this road.
- Cumulative effects on views from the adjacent smaller scale and settled *Narrow Farmed Valleys*, the Deveron valley within neighbouring Aberdeenshire and on the setting of landmark historic features such as Auchindoun Castle.

- Visual confusion and an absence of rationale which could occur between large turbines sited in simple and more expansive upland areas and the same size of turbine also located within the more settled valleys and basins of this landscape.

17.2.2 *Constraints*

- The shallow farmed and settled basin of the Cabrach where the scale of the landscape is reduced by a more distinct land cover pattern and by small farms and houses.
- The hills and slopes on the outer edges of this landscape which backdrop the more sensitive settled and smaller scale landscapes of the Fiddich and Deveron valleys.
- The visual prominence and setting of The Buck, a landmark hill and cumulative effects from its summit where the operational Doronell, Clashindarroch and Kildrummy wind farms are already visible in relatively close proximity.
- The setting of the historically important Auchindoun Castle which lies close to the northern edge of this Assessment Unit and is a popular visitor attraction.
- The 'sense of arrival' associated with panoramic views from elevated sections of the A941 and A920 when crossing into Moray.
- Cumulative effects with any additional wind energy developments seen in combination with the operational Dorenell and Clashindarroch wind farms on the Deveron Valley and in views from the A941.
- Effects on views from popular hill summits and elevated walking routes, including from Ben Rinnes and Ben Aigan where additional development would be seen cumulatively with operational wind farms.
- The proximity of the Cairngorms National Park and the setting of the Ladder Hills and Glen Buchat to the south of this Assessment Unit.
- Increased intrusion on the *Open Uplands with Steep Slopes* and the *Ben Rinnes* SLA – larger turbines and/or turbines sited closer to the upland ridge on the south-eastern side of Glen Rinnes could breach the screening it provides to the Dorenell wind farm in low-elevation views from roads and settlement in this sensitive area.

17.2.3 *Opportunities*

- The simple, gently graded landform and expansive scale of the long undulating ridges and shallow contained bowls to be found within the upland areas of this landscape.

17.3 Sensitivity and guidance

The expansive sweeping scale of this landscape, the generally smooth landform, often with gentle gradients, as well as the overall extent of the uplands and simple land cover all combine to reduce susceptibility to larger turbines. This Assessment Unit, however, lies close to more sensitive landscapes including the *Ben Rinnes* SLA and the *Cairngorms National Park* and this increases sensitivity. This landscape has a ***High*** sensitivity to turbines >150m and a ***High-medium*** sensitivity to turbines 100-150m.

Turbines 100-150m set well back into the interior of these uplands are more likely to minimise effects on adjacent smaller scale valleys including the dramatic basin of the Cabrach, the Deveron valley and Glen Rinnes. Visible aviation lighting on turbines >150m high would be likely to increase the duration and nature of effects given the dark skies which are a characteristic of this sparsely settled landscape and the surrounding area (including the Ben Rinnes SLA and Cairngorms National Park). Small extensions to operational wind farm developments or single/small groups of turbines rather than more extensive new wind farms are more likely to minimise landscape and visual effects.

Turbines should be sited to avoid significant impact on smaller scale and more settled landscapes within and surrounding this Assessment Unit and on valued features, including on views from Auchindoun Castle. Turbines should be set well away from the landmark hill of The Buck and not be located on prominent hill tops, skylines or slopes close to the A941 in order to avoid a dominant 'corridor effect' of wind turbines experienced when travelling through the Cabrach. The present screening of the Dorenell wind farm from lower elevation views within Glen Rinnes by an upland ridge on its south-eastern side should be conserved. Turbines should also avoid significant intrusion on views from popular hill summits including Ben Rinnes and Ben Aigan.

17.3.1 *Repowering of operational wind farms*

The operational Dorenell wind farm comprises turbines 126m high. Repowering of this wind farm with substantially larger turbines >150m could exacerbate effects on the scale and character of the Cabrach. It could also increase prominence from elevated viewpoints within the Ben Rinnes SLA and from parts of the Cairngorms National Park.

17.3.2 *Smaller turbines*

There is unlikely to be significant demand for smaller typologies <100m within the sparsely settled uplands of this landscape. Some limited opportunities exist for smaller turbines to be located on gentle lower hill slopes at the transition between the upland ridges and the farmed land where they would minimise cumulative impacts with nearby wind farms and could relate to the scale of farms, woodlands and farmland. Turbines <50m high would minimise cumulative effects with operational turbines due to their reduced prominence and clear size difference and siting rationale.

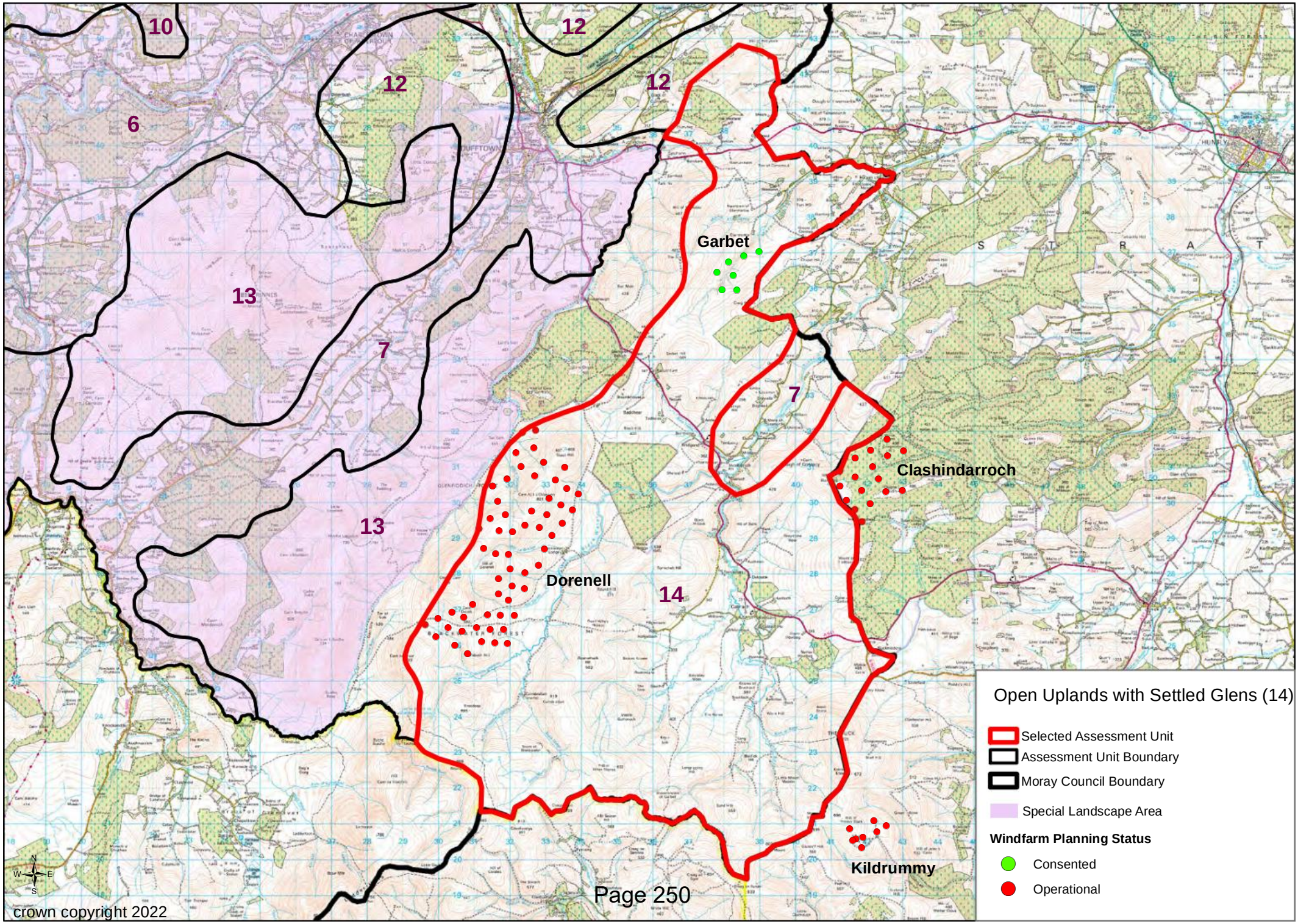
The wide bowl of the Cabrach is rimmed by extensive, long gently undulating ridges, but the degree of vertical relief between the farmed bowl and the ridgeline is low.

The operational Dorenell wind farm extends along the ridge line containing the northern part of the Cabrach basin.

The Buck, a 'landmark hill', rises to over 700m and is prominently sited on the boundary with Aberdeenshire

More complex landform along the floor of the glen and a higher degree of enclosure, reinforces the smaller scale of the upper Deveron at the transition with the 'Narrow Farmed Valley'

Open Uplands with Settled Glens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Garbet
Clashindarroch
Dorenell
Kildrummy
Open Uplands with Settled Glens (14)
Selected Assessment Unit
Assessment Unit Boundary
Moray Council Boundary
Special Landscape Area
Windfarm Planning Status
Consented
Operational
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18 SUMMARY OF FINDINGS AND RECOMMENDATIONS

18.1 Introduction

This section of the report summarises the key findings of the sensitivity assessment undertaken for 14 Assessment Units across Moray. It addresses the landscape and visual issues associated with wider strategic planning of wind farm and turbine developments and sets out recommendations for an overall landscape strategy.

18.2 Key findings of the sensitivity assessment

Sensitivity to different sizes of wind turbines has been considered with these comprising broad groupings of turbines based on height to blade tip. The emphasis of the study is on larger turbines which currently comprise commercial wind farm developments. Figures 4 and 5 show the landscape and visual sensitivity of Assessment Units to larger wind turbines >100m high to blade tip.

18.3 Strategic landscape issues

The sensitivity assessment identifies constraints and opportunities within each Assessment Unit. Although landscape context is considered as one of the key sensitivity criteria, the assessment essentially relates to specific landscapes and any effect on immediately adjacent Assessment Units in isolation. It is important to therefore also take into account the experience and appreciation of the landscape of Moray as a whole and to consider the wider implications of the conclusions of the individual assessments. The following text provides this landscape overview and addresses strategic cumulative landscape and visual effects of wind energy development before setting out a series of key landscape recommendations.

As a starting point, we have identified key distinctive landscape features which recur across Moray and have highlighted these in the sensitivity assessments undertaken for each Assessment Unit in the study. We have focused on landscape features which could potentially be significantly and adversely affected by wind energy development.

18.3.1 *The 'Landmark Hills'*

There are a number of well-defined, steep-sided hills which form prominent 'landmark' features seen across Moray. These are Knock Hill, Bin of Cullen, Meikle Balloch, Ben Rinnes (together with Little Conval and Meikle Conval), The Buck, Ben Aigan, Romach Hill, Mill Buie, Carn Kitty, Roy's Hill, Carn na Cailliche, Brown Muir, the Knock of Braemoray and Carn Biorach but also the smaller hills of Binn Hill, Tappoch and Quarry Wood which stand out within the low-lying *Coastal Farmland* (see Figure 6). The majority of these hills are highly visible and easily recognisable landmarks with many forming the immediate backdrop to settlements, small scale valleys and the coast. Some of these hills form visual 'buffers' to less prominent upland areas and are important in visually containing operational wind farm development from more settled valleys. The landmark hills are highly sensitive to wind turbine development sited on or near them as this would be visually prominent in views from roads and settlement within adjacent well-settled landscapes and would detract from their distinct form and

character. A more detailed description of each of these landmark hills is set out in Appendix E.

18.3.2 *Less developed upland areas*

There are very few upland areas remaining in Moray which do not accommodate wind farm developments. The uplands centred on Ben Rinnes, within the *Open Uplands with Steep Slopes* Assessment Unit comprises a rare tract of less developed uplands. SNH's 2014 Relative Wildness Map confirms the stronger wildness qualities of this area. Ben Rinnes and the steep-sided hills surrounding it are well-used by walkers. These hills are also important in providing a backdrop to the Cairngorms National Park. Given the extent of wind farm development already occupying much of the upland area within Moray, this remaining less developed upland area is a rare and valuable resource, recognised in its designation as a Special Landscape Area.

18.3.3 *The coast and wider seascape*

The coast and wider seascape of the Moray Firth is another key landscape feature. The value of the Moray coast is recognised in the series of contiguous Special Landscape Area designations which cover it. The coast includes extensive stretches of natural coastline and also features a distinctive pattern of historic fishing settlements. Although influenced in places by MOD development, the *Coastal Margin* Assessment Unit considered in this study strongly contrasts with more modified farmed landscapes in Moray and the diversity and scale of intricate coastal landform. The strong sense of naturalness associated with sections of the coast and the setting of historic settlements would be highly sensitive to most sizes of wind turbine. The stronger qualities of wildness associated with the more remote stretches of coast in Moray are recognised in SNH's Relative Wildness Map of June 2014. The coastal forests which back the coast are also important, being well-used for recreation and increasing the containment of the coast and the sense of seclusion that can be experienced.

18.3.4 *Extensive forests and dramatic narrow valleys*

The extensive estate forests found in the western part of Moray are well-managed and notable for their diverse and naturalistic character. They are complemented by mixed policy woodlands associated with the deeply incised and dramatic valleys of the Findhorn and Divie and the many designed landscapes which provide the setting to historic houses and lodges. The value of this area is recognised in a Special Landscape Area designation. These densely wooded valleys create a distinctive and highly scenic approach to Moray experienced from the A940, contrasting with the open expansiveness of the Dava and Lochindorb Moors to the south.

18.3.5 *Scenic approaches to Moray*

The A939/A940 presently provides a scenic approach to Moray when travelling northwards from the Cairngorms National Park, traversing contrasting wild open moorland in the Lochindorb and Dava area and diverse woodlands. The consented Cairn Duhie wind farm, located in the *Open Rolling Uplands* Assessment Unit within Highland, but lying close to the Moray boundary, will significantly detract from this

scenic route. Any further development of larger turbines located in close proximity to this route could exacerbate this effect.

There is also a strong sense of arrival gained when travelling into Moray on the A941 from Aberdeenshire where the dramatic experience is enhanced by panoramic views which are revealed when cresting the high pass of the Cabrach. The view from the A941 over the expansive bowl landform of the Cabrach has significantly altered following the construction of the Dorenell wind farm. This approach to Moray is susceptible to cumulative effects where further development could create a dominant effect by locating large turbines closer to the route and/or on either side of the road. The sense of expansiveness and dramatic character of the Cabrach appreciated from this route could be further diminished by the extension of the Dorenell wind farm and/or the introduction of substantially larger turbines on the uplands to the west.

The A920 between Huntly and Dufftown also provides an attractive approach to Moray with scenic views to the Deveron valley close to the border of Moray and Aberdeenshire and, within Moray, long views south-westwards towards the softly rolling hills lying in the northern part of the *Open Uplands with Settled Glens*. The scenic qualities of part of this route will be adversely affected by the consented Garbet wind farm.

Figure 6 shows these key approaches to Moray.

18.4 The existing pattern of wind farm development in Moray

Large operational and consented wind farm developments are generally associated with the more expansive upland areas within Moray. These developments include the Rothes, Paul's Hill, Clash Gour, Berry Burn and Dorenell wind farms. The Hill of Towie and Aultmore wind farms are located within less extensive areas of upland plateau, and this generally increases/will increase the visual impact of these wind farms on adjacent more settled areas.

Single and small groups of operational turbines between 50-100m are mainly located within the *Upland Farmland* but with occasional single larger turbines found within the *Rolling Farmland and Forests*, and the *Broad Farmed Valleys.* These operational developments contrast with the established pattern of larger turbines associated with larger scale upland landscapes and generally incur more significant impacts on landscape character and on visual amenity because of their location within more settled and smaller-scale landscapes. There are very few wind turbines <50m and where they occur their landscape and visual effect is not widespread.

Operational wind farms and larger turbines sited within landscapes adjoining Moray have been considered in the study. Inter-visibility between Moray and Aberdeenshire to the east between Cullen and the A96 is contained to some extent by a series of ridges and hills on the boundary, limiting views of operational wind farm development located in both regions from low level roads, settlement and coasts. Inter-visibility between Moray and Highland is greatest in the west across the open and relatively low-lying Dava and Lochindorb Moors although the landmark hills of Knock of Braemoray and Carn Biorach and extensive forestry in the north provide some screening.

18.5 Current trends and issues related to wind farm development

The following trends and issues have been taken into account in considering an appropriate landscape strategy for Moray:

- Pressure for wind farm developments located towards the outer edges of upland landscapes (usually where operational wind farms are sited within the interior of the upland area) and therefore lying closer to more settled and complex lowland landscapes thereby potentially increasing landscape and visual impact.
- The demand for substantially larger turbines up to around 220m height, in combination with siting closer to upland edges, has potential to increase landscape and visual impact on surrounding more sensitive landscapes.
- Extensions to operational wind farms which comprise substantially larger turbines and/or are different in their siting and association with a specific landscape feature (for example a bowl landform which provides some visual containment) thus affecting the design integrity of the original development and also resulting in cumulative effects as obviously different sized turbines are juxtaposed.
- Proposals for increases in turbine sizes of consented wind farms i.e. new applications submitted before any construction of the original consented proposal has been constructed.

To date, there has been no registered interest in the repowering of older operational wind farm developments in Moray.

18.6 Sensitivity to larger turbines over 100m high

The large extent of operational and consented wind farm development already located within Moray's uplands limits opportunities for additional turbines to be accommodated whilst minimising effects on adjacent more sensitive landscapes. This particularly applies to the *Open Rolling Uplands* and the *Upland Moorland and Forestry* and the *Open Uplands with Settled Glens* Assessment Units considered in this study. New development of turbines >150m (which may comprise stand-alone wind farms or 'extensions' to operational wind farms) within these upland Assessment Units would increase landscape and visual effects on adjacent more sensitive landscapes. This is because operational wind farms already occupy much of the less sensitive interior parts of these landscapes and additionally benefit from some screening in some areas by higher peripheral hills. New developments are more likely to be proposed closer to the edges of these uplands and therefore in closer proximity to more sensitive landscapes such as settled valleys. Greater number of turbines on the outer upland edges, combined with the increasing heights of turbines, will be likely to significantly exacerbate effects on more sensitive landscapes.

The importance of siting and designing wind farms to minimise landscape and visual effects and to protect an acceptable level of amenity for adjacent communities is recognised in Scottish Planning Policy.

18.7 Sensitivity to smaller turbines below 100m high

There has been a reduction in applications for smaller turbines within Moray since 2012 when the first Moray Wind Energy Landscape Capacity Study was undertaken. It is understood that availability of this size of turbine is limited and while in theory refurbished older turbines could come onto the market for reuse, this does not appear to be happening.

The lowland areas of Moray have an even dispersal of relatively small farms and other developments and cumulative landscape and visual effects could be significant if even a small number of these were to feature a turbine of up to this height, with multiple turbines in close proximity likely to overwhelm landscape features. Turbines <25m high would be less visually prominent and fit better with the scale of other landscape features in settled lowland landscapes and minimise cumulative effects.

18.8 Opportunities for repowering of operational wind farms

In general, the larger the extent and scale of an upland landscape, the less susceptible it is to larger wind turbines. Other factors also come into play including the value associated with some upland landscapes (including their scenic qualities and importance for recreation), the presence of operational and consented wind farm development and the proximity to smaller scale landscapes.

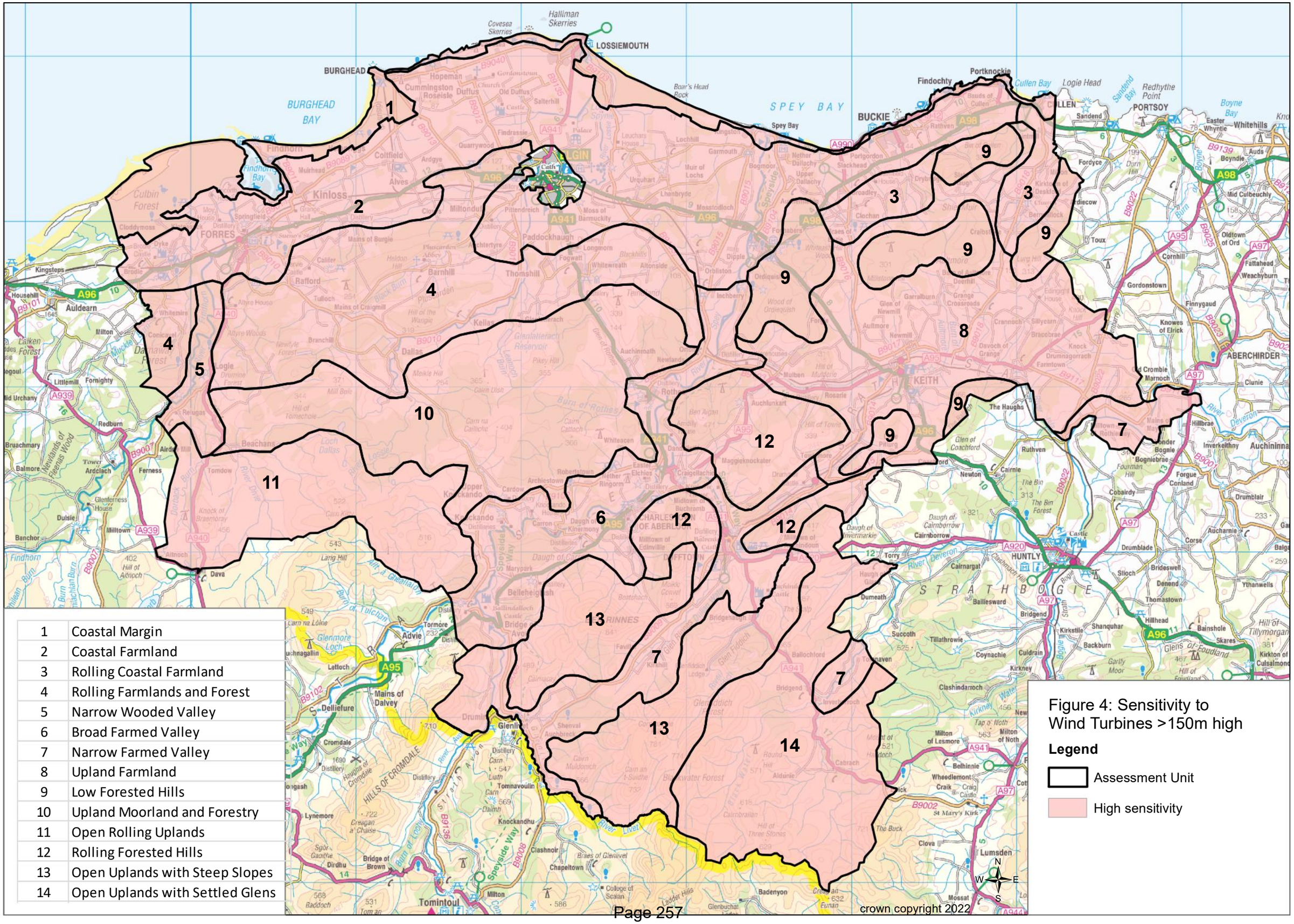
The *Upland Moorland and Forestry* and the *Open Rolling Uplands* (which border each other therefore expanding the extent of upland area distant from roads and settlement) offer greatest opportunity for repowering existing wind farms whilst minimising landscape and visual effects. Operational turbines within these uplands are currently 100-125m high to blade tip and most of these are located within the less visible interior of these uplands. Repowering of smaller turbines within the more sensitively sited older operational wind farms is likely to offer greatest opportunity to accommodate larger turbines whilst minimising effects on surrounding landscape and visual receptors. There may be opportunities to further mitigate effects on surrounding sensitive landscape and visual receptors by redesigning repowered wind farms, including relocating and reducing the number of turbines.

18.9 A recommended landscape strategy

- ***Protect the landmark hills and their setting*** Views of these hills recur across Moray where they form highly visible and easily recognisable landmarks. Many also form visual 'buffers' to less prominent upland areas, or the backdrop to settlements, small scale valleys and the coast. Wind farm development on or near these hills would be visually prominent and would detract from their distinct form and character.
- ***Maintain the distinctive approaches to Moray*** including the scenic A940/A939 route where attractive woodlands, deeply incised intimately scaled valleys, landmark hills and open moorland provide a richly scenic landscape. Visual intrusion by additional larger turbines located close to this route would detract from the scenic approach it provides to Moray, and also from the qualities of wildness and huge sense of space that can be experienced from

these western routes. The drama of the A941 over the Cabrach should be maintained by limiting additional significant intrusion by wind energy development while the scenic quality of views from the A920 should be protected from larger turbines sited close to this route or substantially extending over the skyline of folded hills seen to the south-west.

- ***Maintain the rugged scenery and setting to more dramatic uplands in the Ben Rinnes area*** by directing wind farm development away from these areas and avoiding developments that could impact on the wider landscape setting and appreciation of these landscapes. Cumulative landscape and visual effects of wind farm development in surrounding landscapes will need to be carefully considered in terms of potential effects on the perception of wildness and on views from popularly accessed hills. This upland area forms one of the few remaining landscapes in Moray with stronger qualities of wildness.
- ***Protect the special qualities of the coast and its associated historic settlements*** by resisting development of wind turbines where they could intrude on views from roads, settlement and recreational areas and also affect the setting of historic settlements and the strong sense of wildness experienced along the most natural and remote stretches of coast.
- ***Ensure that any further development of larger turbines is clearly associated with less sensitive upland landscapes*** where the greater extent and larger scale of these landscapes can better accommodate, and provide an appropriate setting, to large turbines. Impacts on adjacent more sensitive smaller scale settled landscapes should be minimised by setting development well back into the lower-lying interior of more extensive tracts of upland, and by also considering limitations in the height and numbers of turbines.
- ***Protect the character and special qualities of the Special Landscape Areas*** The coast, the western wooded valleys and estates, the Spey, Deveron and Pluscarden valleys and the high, undeveloped uplands centred on Ben Rinnes are all covered by the Special Landscape Area designation. Some smaller landscape lying close to Elgin and Forres are also designated. These landscapes are valued for their scenery, biodiversity, cultural heritage and because of their attraction for recreation and tourism. The Special Landscape Area designation is an accolade of the best of Moray's landscapes and a vehicle for safeguarding and enhancing these landscapes, in accordance with SPP paragraph 197. Larger wind turbines sited within or close-by these SLAs would be likely to have significant effects on their character and special qualities and should be resisted.
- ***Ongoing review of cumulative landscape and visual effects of multiple wind turbine developments*** will be necessary to ascertain cumulative landscape and visual effects. This will particularly apply to the upland areas of the *Open Rolling Uplands*, *Upland Moorland and Forestry* and *Open Uplands with Settled Glens* Assessment Units where current demand for wind farm development is focussed.



1	Coastal Margin
2	Coastal Farmland
3	Rolling Coastal Farmland
4	Rolling Farmlands and Forest
5	Narrow Wooded Valley
6	Broad Farmed Valley
7	Narrow Farmed Valley
8	Upland Farmland
9	Low Forested Hills
10	Upland Moorland and Forestry
11	Open Rolling Uplands
12	Rolling Forested Hills
13	Open Uplands with Steep Slopes
14	Open Uplands with Settled Glens

Figure 4: Sensitivity to Wind Turbines >150m high

Legend

☐ Assessment Unit

▨ High sensitivity

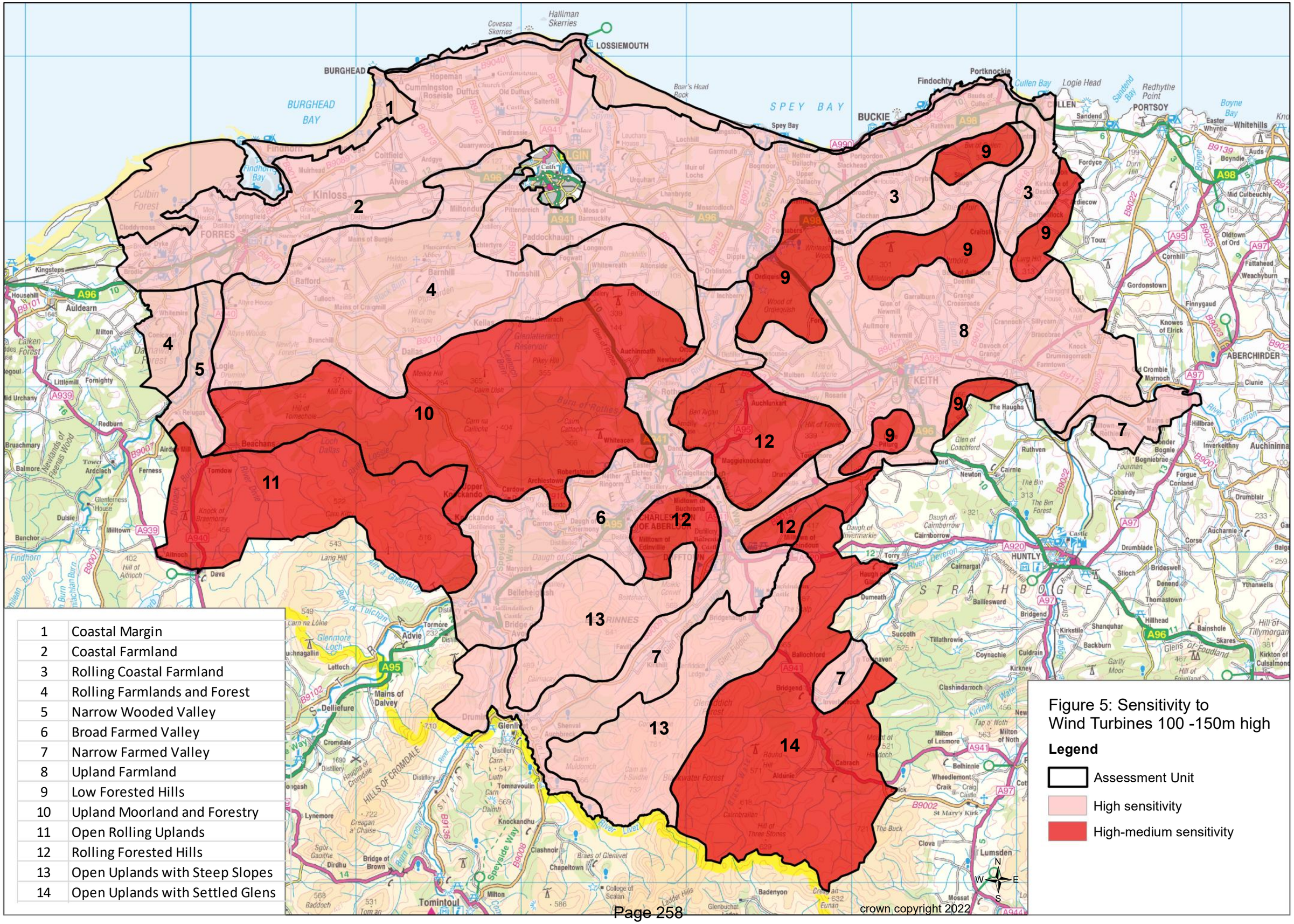


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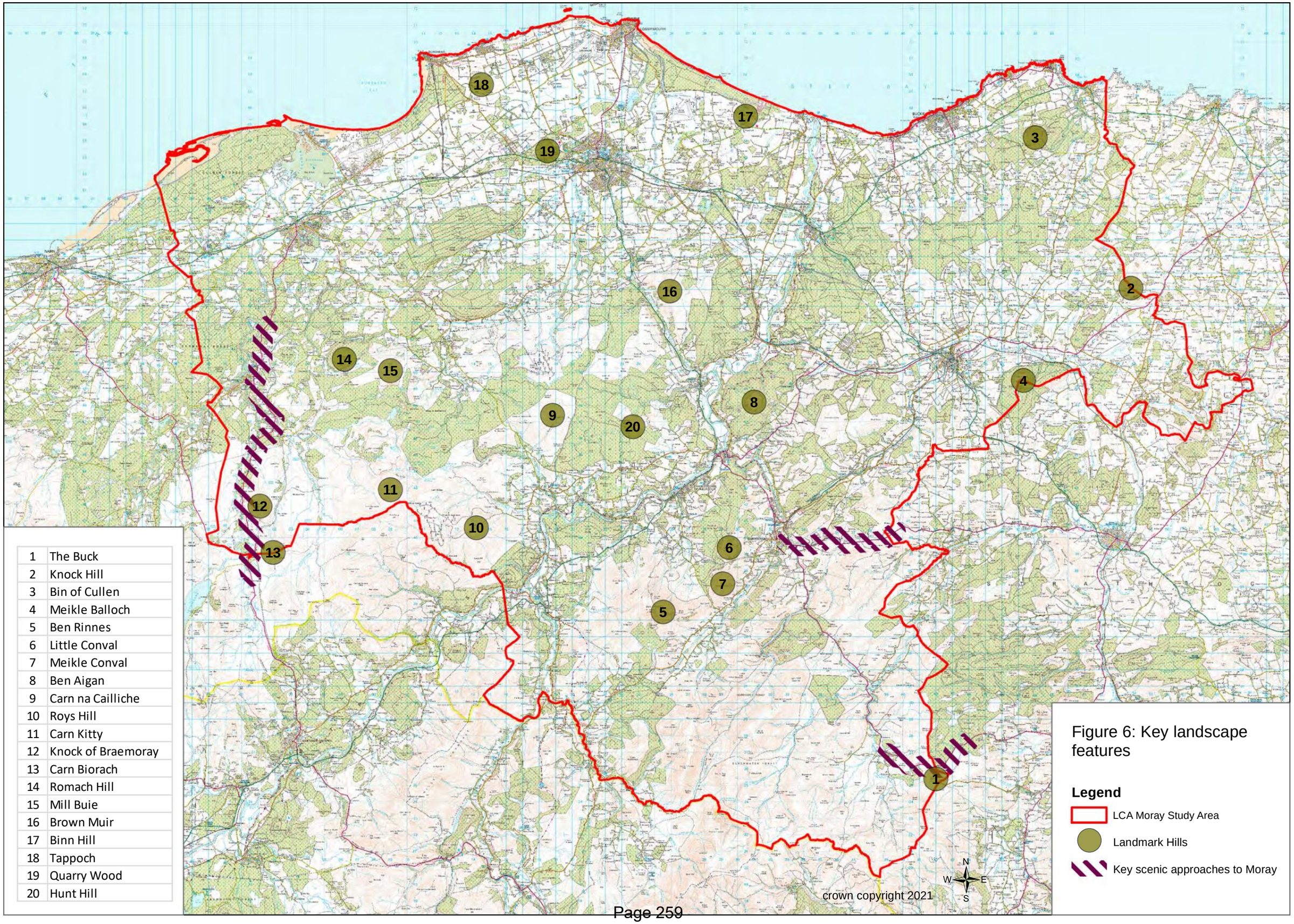
Figure 5: Sensitivity to Wind Turbines 100 -150m high

Legend

- Assessment Unit
- High sensitivity
- High-medium sensitivity



1	The Buck
2	Knock Hill
3	Bin of Cullen
4	Meikle Balloch
5	Ben Rinnes
6	Little Conval
7	Meikle Conval
8	Ben Aigan
9	Carn na Cailliche
10	Roys Hill
11	Carn Kitty
12	Knock of Braemoray
13	Carn Biorach
14	Romach Hill
15	Mill Buie
16	Brown Muir
17	Binn Hill
18	Tappoch
19	Quarry Wood
20	Hunt Hill

Figure 6: Key landscape features

Appendix A: References

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Appendix B: Scoping Exercise

Landscape Assessment Unit	Initial appraisal of key characteristics	Turbine typologies considered in the detailed assessment
Coastal Margin	While this coastal landscape is not small scale due to the 'borrowed' expansiveness of the Moray Firth, the complexity of coastal features, the popularity of the coast for recreation (increasing visual susceptibility and value) and the sense of naturalness and seclusion associated with this coast increase susceptibility to larger turbines.	Turbines <100m
Coastal Farmland	The subtly undulating to flat landform and openness of this landscape increases scale although the presence of settlement and other small features provides ready scale references against which larger turbines could be gauged. This landscape includes some larger buildings associated with agricultural and industrial production which may form a focus for wind energy development. There may be demand for farm-based turbines in future.	Turbines <150m
Rolling Coastal Farmland	While upper slopes are more open and expansive, the rolling landform and woodlands and well-settled character of much of this landscape reduces scale and increases susceptibility to larger turbines. There may be demand for farm-based turbines in future.	Turbines <150m
Rolling Farmland and Forest	This landscape has a small to medium scale, complex rolling landform in places and low relief increasing susceptibility with regard to scale. It is moderately settled with a number of farms which may increase demand for single and small groups of smaller turbines in future. The diverse woodland cover is an added constraint although broader areas of farmland are also present.	Turbines <150m
Narrow Wooded Valley	The small scale and limited extent of this narrow valley would be dominated by larger wind turbines. The integrity of the richly diverse woodland and policies which are a key characteristic of this landscape is also highly susceptible to multiple turbines which may require its removal. There would also be likely to be technical constraints to accommodating larger turbines in this sheltered valley.	Turbines <100m
Broad Farmed Valley	This landscape varies in scale ranging from the intimately scaled incised Spey on the floor of the valley to the broader shoulders and gently graded upper slopes where landcover pattern is also simpler. This landscape is well-settled and the	Turbines <150m

	regular pattern of buildings provides ready scale references against which larger turbines could be gauged. There may be demand for farm or industry (distilleries) based turbines in future.	
Narrow Farmed Valley	The small scale and limited extent of this narrow valley would be dominated by larger wind turbines. There would also be likely to be technical constraints to larger turbines in this sheltered valley.	Turbines <100m
Upland Farmland	An elevated broad and shallow farmed valley which is well-settled but has a simple landcover pattern and open character which increases scale in places. The higher hills near Keith already accommodate a wind farm and single and small groups of farm-based turbines are also present in the north.	Turbines <150m
Low Forested Hills	Low-lying and generally forested hills and broader plateaux. Although the subtle landform, absence of settlement and simple landcover of this AU increases scale they are not extensive in area and lie close to more sensitive landscapes. Consented wind farm developments lie in this AU	Turbines <150m
Rolling Forested Hills	The AU varies in its scale comprising larger scale uplands in the Ben Aigan/Hill of Towie area to lower elevation rolling upland farmland south of Dufftown. The larger scale uplands are not extensive in area increasing susceptibility in relation to effects on adjacent landscapes. Part of this AU accommodates operational and consented wind farms.	Turbines <150m
Upland Moorland and Forestry	This AU accommodates operational and consented wind farms and forms the focus of current interest from wind farm developers. This landscape is sparsely settled and the landform is generally gently undulating with a simple landcover pattern which increases scale but with settled outer fringes of this AU having a smaller scale.	Turbines >100m (assumed to be up to approximately 250m)
Open Rolling Uplands	This AU already accommodates operational and consented wind farms and forms the focus of current interest from wind farm developers. The landscape generally has a large scale, simple landcover and is very sparsely settled.	Turbines >100m (assumed to be up to approximately 250m)
Open Uplands with Steep Slopes	This upland landscape generally has a large scale and simple landcover although narrow glens and lower slopes are	Turbines >100m (assumed to be up to approximately 250m)
Open Uplands with Settled Glens	This upland landscape generally has a large scale, simple landcover and is sparsely settled. This landscape already accommodates	Turbines >100m (assumed to be up to approximately

	operational wind farm development and forms the focus of current interest from wind farm developers.	250m)

APPENDIX C: DETAILED SENSITIVITY ASSESSMENT TABLES

Contents

Coastal Margin
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Rolling Farmland and Forest
Narrow Wooded Valleys
Broad Farmed Valley
Narrow Farmed Valleys
Upland Farmland
Low Forested Hills
Upland Moorland and Forestry
Open Rolling Uplands
Rolling Forested Hills
Open Uplands with Steep Slopes
Open Uplands with Settled Glens

Coastal Margin- Detailed Sensitivity Assessment		
Summary description	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Scale The Moray Firth gives a sense of expansiveness to the overall seascape. Long even beaches are open although more intricate sections of rocky indented coastline, narrow raised beaches and extensive dune systems have a smaller scale. Dispersed buildings are rare although a regular pattern of small settlements is a characteristic of this coast. Forests and enclosed farmland also provide scale references.	Although this turbine type could relate to the scale of more open, long even sections of coastline and the wider Moray Firth, areas of more complex indented coastline, the low relief of the shoreline, raised beaches and low cliffs would be highly sensitive in terms of comparisons of scale to turbines of this size. Small settlements and other features would be dominated by this turbine type if sited nearby. ***High***	Turbines of this size could relate to the scale of more open, long even sections of coastline and more expansive hinterland areas. Small scale shoreline features including very narrow raised beaches, dunes and low cliffs and the compact coastal settlements are sensitive particularly to turbines towards the upper height band of this turbine type. ***High-medium***
Landform A diverse and often complex landform with long sandy and banked stony beaches backed by complex sand dunes, spits and other transient geomorphological features in the Culbin, Findhorn and Spey estuary area. The coast is indented and rocky to the east and between Lossiemouth and Burghead, featuring small coves, promontories and occasional craggy islets. A raised beach platform and associated low cliff occurs between Buckie and Cullen.	The complex form of dune systems and more intricate coastal features would be highly sensitive to this turbine type. Although turbines of this size would relate better to the simpler stretches of coast and the gently sloping immediate hinterland present in some areas, they would detract from nearby more complex landform appreciated in long views along the coast. The abrupt edges of cliff tops, the low, narrow ridge between Lossiemouth and Burghead and skylines overlooking the coast would be particularly susceptible to this turbine type. ***High***	The complex form of dune systems and more intricate coastal features including estuaries and basins are sensitive although turbines towards the lower height band of this turbine type (<25m) could relate to more even sections of coastline or be sited in flatter areas on the inland side of the coastal forests where they would not be seen in conjunction with more complex coastal features. The abrupt edges of cliff tops, the low, narrow ridge between Lossiemouth and Burghead and skylines overlooking the coast would be particularly sensitive. ***High-medium***
Landcover Cultivated fields, often enclosed by stone walls, slope gently down to the low cliffs of raised beaches in the east. Gorsey scrub colonises cliff tops and small knolls on seaward facing slopes and rocky knolls. Extensive pine forests planted on dunes and poorer soils and gravels back the coast in places and are particularly extensive to the west. Many of these forests are managed for their recreation and conservation value and are often diverse. Mudflats and saltmarsh form complex	This turbine type would detract from the diverse vegetation pattern which is closely associated with the landform of the *Coastal Margin*. More productive forestry and open farmland would be less susceptible. ***High-medium***	Susceptibility is reduced as smaller turbines would be more able to be sited to avoid detracting from more diverse coastal vegetation. ***Medium***

Coastal Margin- Detailed Sensitivity Assessment		
Summary description	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
patterns within the tidal Findhorn Bay and Spey estuary. Golf courses are occasional features.		
Built environment There is a strong identity to the settlements which are regularly spaced along the coast. Many are of historic and architectural interest. Lossiemouth and Burghead are distinctively sited on promontories above sheltered harbours while the planned fishing ports to the east are tucked below cliffs on narrow raised beaches. Parts of the immediate hinterland are more developed, for example between Lossiemouth and Burghead, Findhorn and east of the Spey with MOD development, golf courses and caravan parks. The lighthouse west of Lossiemouth forms a landmark feature. There are no wind turbines located in this AU and other wind farms lie some distance from this AU and do not have a strong influence on character or views. The Findhorn turbines are relatively small <50m and lie close to this coast but are seen in the context of MOD infrastructure and inter-visibility is also restricted by dunes and coastal forest.	This turbine type would dominate the setting of architecturally distinctive settlements if sited nearby and/or on containing skylines. Turbines of this size, and particularly multiple turbines, could disrupt the regular pattern of largely compact settlements, often clearly associated with river mouths or sheltered natural harbours set along the coast by filling gaps of open land between. The lighthouse west of Lossiemouth would be sensitive to turbines sited nearby. Susceptibility is reduced in relation to cumulative effects due to the distance of other wind farms and the small size and limited visibility of the smaller Findhorn turbines. ***High***	This turbine type could dominate the setting of architecturally distinctive settlements if sited nearby and/or on containing skylines. Multiple turbines could disrupt the regular pattern of largely compact settlements although there is increased scope to accommodate smaller turbines within this height band <25m to minimise effects on settlement pattern and setting. Lighthouses and other focal built features would be sensitive to turbines sited nearby. ***High-medium***
Landscape context This character type forms a very narrow coastal margin largely defined by the low cliff of a raised beach in the east and a distinct ridge between Lossiemouth and Burghead. The character type is wider to the west where it includes the coastal forests, the most extensive of these being Culbin. This landscape lies adjacent to the *Coastal Farmland* although inter-visibility between the two is often restricted by landform and forestry. There is greater inter-visibility of these character types east of the River Spey due to the absence of screening features.	The narrowness of this character type increases sensitivity in terms of effects on adjoining landscapes. This turbine turbine type is likely to have a significant impact on the *Coastal Farmland*, which although extensive and relatively simple in terms of its landform and land cover, is well settled and very open. Turbines of this size could detract from the landmark hill of the Bin of Cullen and the setting to Cullen House, within the *Coastal Farmland* if sited in the eastern part of this character type. ***High-medium***	Smaller turbines would have less of an effect on the adjoining *Coastal Farmland* although the landmark hill Bin of Cullen and the setting of Cullen House are sensitive. ***Medium***

Coastal Margin- Detailed Sensitivity Assessment		
Summary description	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Visual amenity The *Coastal Margin* is well-settled and the forests and coast are highly valued for recreational use. There are open views across the Moray Firth to the distant Sutherland coast and hills. Views between the Moray coast and hinterland, including the adjacent *Coastal Farmland* are screened by landform and forestry in places although inter-visibility along the coast and the wider Moray landscape is increased along more open, long and even sections of coast. Binn Hill is prominent in these views.	This size of turbine would be highly visible from roads, settlement and beaches within this character type where it would form a dominant feature. Turbines of this size would also be prominent in views from the *Coastal Farmland* and from the north-facing settled slopes of the *Rolling Farmlands and Forest* and the *Rolling Coastal Farmland.* ***High***	The openness of the coast and high recreational use increases visual sensitivity. Turbines of this size would be intrusive from roads, settlements and areas used for recreation, particularly if sited on the edge of beaches, between the coast and the A942 or sited on ridge tops and within narrow raised beaches and on the abrupt edge of cliffs. Susceptibility would be reduced for turbines towards the lower height band of this turbine type (<25m) particularly if sited inland so screened from the more sensitive coast by forest. ***High-medium***
Landscape value This landscape largely falls within the Moray Coast SLA. Key qualities of the SLA include its diverse and important geomorphology, ecology and cultural heritage interests and its attraction for recreation and the sense of naturalness and seclusion that can be experienced along less settled parts of the coast.	Turbines of this scale could intrude on the sense of seclusion and naturalness experienced in the SLA and could significantly detract from the diverse character of the coast. ***High***	Turbines of this size could intrude on the sense of seclusion and naturalness experienced along parts of the coastline although there is increased scope for smaller turbines to be set back from the more sensitive coastal edge and to be screened by coastal forest and thus minimise impacts on perceptual qualities. ***High-medium***
Sensitivity Turbines >50m: High sensitivity Turbines <50m: High-medium sensitivity		

Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50m-100m**	**Assessment of turbines <50m**
Scale A generally open and expansive coastal plain but with more rolling landform, occasional outcrop hills and woodlands providing containment in some areas. A lower-lying linear shallow basin extending south/west to north/east is larger in scale and particularly open. This landscape is well settled with a regular pattern of farms, houses and settlements providing ready scale references.	The well-settled nature of this landscape increases susceptibility as these very tall turbines would dominate the scale of buildings and other landscape features including prominent small hills if sited on or nearby them. Areas of more rolling landform similarly have a smaller scale which would be dominated by turbines of this size. ***High***	Turbines towards the lower height band of this type could relate to broader low-lying basins where settlement is sparser although this turbine type in general would appear very large in relation to buildings and woodlands. Turbines of this size would overwhelm the scale of prominent small hills if sited on or nearby them. Areas of more rolling landform similarly have a smaller scale which would be dominated by turbines of this size. ***High-medium***	This turbine type could relate to broader low-lying basins where settlement is sparser although turbines of this size would still appear large in relation to buildings and woodlands and also to the smaller prominent hills (which do not rise above 100m) and more rolling landform. There would be increased scope to site this size of turbine to minimise effects on landscape scale. ***Medium***
Landform This landscape has a predominantly subtly undulating landform but with some occasional landmark hills and ridges including Hill of Spynie close to Elgin and Tappoch and Binn Hill closer to the coast. Pockets of more complex rolling landform occur in the Urquhart, Lhanbryde and Spynie areas and small knolly hills NE of Elgin. The broad floodplains of the Spey and Lossie and a band of very low-lying lland between Lossiemouth and Kinloss have a particularly simple landform.	The generally simple gently undulating to flat landform of this landscape reduces susceptibility although this turbine type would detract from the prominent hills and ridges and small areas of more complex rolling landform if sited on or nearby them. ***Medium***	The generally simple gently undulating landform of this landscape reduces susceptibility although this turbine type would detract from the prominent hills and ridges and small areas of more complex rolling landform if sited on or nearby them. ***Medium***	The generally simple gently undulating landform of this landscape reduces susceptibility. Turbines sited on or close-by prominent hills and ridges and small areas of more complex rolling landform would be detractive although there is increase scope for smaller turbines to be sited to avoid impact on these features. ***Medium-low***
Landcover A simple land cover pattern of large arable fields interspersed with small blocks of conifers. Some larger coniferous plantations occur close to the coast and the Spey Valley. Small pockets of more diverse land cover pattern are associated with the	This turbine type could relate to the simple and generally open character of farmland although policy features and more natural vegetation cover would be more susceptible. ***Medium***	This turbine type could relate to the simple and generally open character of farmland although policy woodlands and more natural vegetation cover would be more susceptible. ***Medium***	There is increased scope for smaller turbines to be sited to avoid impacting on more diverse landcover. ***Medium-low***

Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50m-100m**	**Assessment of turbines <50m**
policies of mixed shelterbelts, parkland and avenues of Innes House, Gordon Castle, Brodie Castle and Gordonstoun, the more naturalistic moss and woodland of the Bauds of Cullen and Spynie Moss and broadleaved woodlands, scrub and wetlands along the Spey.			
Built environment RAF airfields and associated buildings and infrastructure including tall masts are concentrated in the Kinloss, Lossiemouth and Burghead area. Small and larger settlements and occasional historical buildings and grand houses/castles with designed landscapes are present as are larger warehouses, maltings and some quarrying and landfill sites. There is a well-developed network of roads and some transmission lines. A group of small wind turbines <50m high are located near Findhorn. While wind farm development in the Moray uplands is visible it is distant from this AU and does not have a significant influence on character or views.	The setting of small settlements and historic built features increases susceptibility although these features are generally widely dispersed so significant intrusion could be avoided. Infrastructure and industrial development in this landscape reduces susceptibility to some degree although the introduction of turbines of this size would accentuate this aspect of landscape character. Multiple developments of single and small groups of turbines of this size could significantly increase the clutter of disparate elements in this landscape although this AU is sufficiently distant to minimise potential cumulative effects with wind farms located in the Moray uplands. ***High-medium***	The setting of small settlements and historic built features increases susceptibility although these features are widely dispersed so significant intrusion could be avoided. Infrastructure and industrial development in this landscape reduces susceptibility to some degree and turbines towards the lower height band of this turbine type could relate better to their scale. Multiple developments of single and small groups of turbines of this size could increase the clutter of disparate elements in this landscape. This AU is sufficiently distant to minimise potential cumulative effects with wind farms located in the Moray uplands. ***High-medium***	There is increased scope to site smaller turbines to avoid affecting the setting of small settlements and historic built features. This turbine type could accentuate built clutter in parts of this landscape. Turbines of this size closely related to existing industrial development, would have a better scale relationship to these larger buildings and would minimise the spread of built infrastructure. ***Medium***
Landscape context This AU is geographically extensive apart from at its eastern end where it narrows between the coast and the northern edge of *Low Forested Hills* and *Rolling Coastal Farmland* AUs. A low but distinct ridge forms a boundary between this character type and the *Coastal Margin* between Lossiemouth	The extensiveness of this landscape would generally limit impact on adjoining AUs. Sensitivity increases towards the east however where this band of *Coastal Farmland* constricts and where there is more inter-visibility with the *Coastal Margin*. This turbine type could detract from the	The extensiveness of this landscape would generally limit impact on adjoining AUs. Sensitivity increases towards the east however where this band of *Coastal Farmland* constricts and where there is more inter-visibility with the *Coastal Margin*. This turbine type could detract from the	There would be increased scope for this turbine type to be sited within this extensive landscape to avoid significant impact on adjoining more sensitive smaller scale landscapes. Sensitive skylines seen from the less built-up sections of coast within the *Coastal Margin* would still need to be avoided and

Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50m-100m**	**Assessment of turbines <50m**
and Burghead and this, together with the coastal forests planted on more low-lying areas, restricts close views inland to this landscape from the coast. There is greater inter-visibility between these AUs east of the Spey due to the absence of screening features. The smaller scale landscapes of the *Rolling Coastal Farmland* and the *Rolling Farmlands and Forest* (and particularly the pronounced wooded ridge of Heldon Hill) strongly contrast with the expansive low-lying plain of this landscape.	landmark feature of the Binn of Cullen if located in the narrower eastern part of this AU. Turbines of this size sited towards the southern boundaries of this landscape could impact on smaller scale AUs ***Medium***	landmark feature of the Binn of Cullen if located in the narrower eastern part of this AU. Turbines of this size sited towards the southern boundaries of this landscape could impact on smaller scale AUs ***Medium***	turbines of this size could also still detract from key landmark features such as the Binn of Cullen if sited nearby or if interrupting key views to these features. ***Medium-low***
Visual amenity This landscape can be very open in places with extensive and unimpeded views possible from major roads such as the A96 and from the dense network of minor roads which criss-cross this character type. Forestry and subtle ridges limit the extent of views in other areas. The prominent hills of Binn Hill and Tappoch form focal features in views across this landscape. There are views to the uplands of Moray to the south from this area, with Ben Rinnes, Ben Aigan and Brown Muir hills forming key features. The Moray Firth and distant Sutherland coast also feature in views to the north. Infrastructure and buildings associated with the RAF and the Findhorn wind turbines are prominent in the very open western part of this landscape. Close views to this landscape are limited	This size of turbine would be highly visible from roads and settlement within this open landscape and from adjoining more elevated landscapes to the south. Although close views from the *Coastal Margin* are likely to be screened by forest and a coastal ridge west of the Spey, this turbine type would be visible from sections of the coast east of the Spey and they would also be seen in longer and more open views along the coast from promontories and bays where the hinterland is more visible and from the Moray Firth. ***High***	This size of turbine would be highly visible from roads and settlement within this open landscape and from adjoining more elevated landscapes to the south. Although close views from the *Coastal Margin* are likely to be screened by forest and a coastal ridge west of the Spey, this turbine type would be visible from sections of the coast east of the Spey and they would also be seen in longer and more open views along the coast from promontories and bays where the hinterland is more visible and from the Moray Firth. ***High***	The extent of visibility of turbines of this size would be likely to be reduced and they would be less prominent in views than the larger turbines. Turbines towards the lower height band of this turbine type (<25m) would be more easily accommodated as multiple turbines across this open landscape. ***High-medium***

Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50m-100m**	**Assessment of turbines <50m**
from the *Coastal Margin* due to screening provided by forests and landform to the west of the Spey. Some inter-visibility between the coast and this landscape occurs east of the Spey however. The north-facing settled slopes of the *Rolling Farmland and Forest*, and the *Rolling Coastal Farmland* have open and elevated views across this landscape and over the Moray Firth.			
Landscape value The *Lower Spey and Gordon Castle Policies* and the *Spynie* SLAs cover relatively small parts of this AU. This AU lies close to a series of SLAs covering the Moray coast which extend in the east to also include the Binn of Cullen. Key special qualities of both the SLAs in this AU include their importance for cultural heritage, nature conservation and recreation. Both these SLAs are well-wooded which limits views of the surrounding coastal plain. Duffus Castle is a Scheduled monument and a popular visitor destination. Innes House, Gordon Castle, Brodie Castle and Gordonstoun GDLs are also present.	Turbines of this size could affect the seclusion associated with the SLAs and the appreciation of their naturalness and cultural heritage interests if seen above containing woodlands or in more open elevated views. SLAs covering the Moray coast could be affected by turbines sited on the northern edges of this AU and in the narrower eastern part of this AU. The relatively limited extent of designated landscapes and other valued interests such as GDLs increases scope for turbines to be sited to avoid effects on their special qualities. The setting of Duffus Castle is more open and larger turbines sited nearby could affect its prominence in the landscape. ***Medium***	Turbines of this size could affect the seclusion associated with the SLAs and the appreciation of their naturalness and cultural heritage interests if seen above containing woodlands or in more open elevated views. SLAs covering the Moray coast could be affected by turbines sited on the northern edges of this AU and in the narrower eastern part of this AU. The relatively limited extent of designated landscapes and other valued interests such as GDLs increases scope for turbines to be sited to avoid effects on their special qualities. The setting of Duffus Castle is more open and larger turbines sited nearby could affect its prominence in the landscape. ***Medium***	There would be more scope for this size of turbine to avoid effects on the SLAs and other valued features which cover relatively small parts of this AU. ***Medium-low***
Sensitivity Turbines 100-150m: High-medium sensitivity Turbines 50-100m: High-medium sensitivity Turbines <50m: Medium sensitivity			

Rolling Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Scale A rolling landform with small hills cut by narrow valleys offers a degree of containment and reduces scale. This landscape is well-settled with a dispersed pattern of small farms and these, together with woodlands, provide ready scale references. The landscape becomes more open on upper hill slopes which are broader at the transition with the *Low Forested Hills.*	This turbine type would dominate the largely small to medium scale of this landscape. The consistent presence of small features, including dispersed settlement, also increases susceptibility. ***High***	This turbine type would dominate the largely small to medium scale of this landscape. The consistent presence of small features, including dispersed settlement, also increases susceptibility. ***High***	There is increased scope to site this turbine type within broader upper hill slopes but also on more open areas on lower farmed slopes. Narrow valleys and small rolling hills remain susceptible. While this turbine type would appear large in relation to domestic buildings, turbines towards the lower height band would relate better to the occasional larger agricultural sheds present in this landscape. ***Medium***
Landform Small, rounded interlocking hills are cut by narrow incised burns – the Deskford Valley is broader but with undulating slopes. Landform is generally more complex on the lower slopes with broader, more even gradients on upper slopes and occasional small flatter areas.	Broader and more gently graded upper hill slopes and areas of flatter ground are limited in extent reducing scope to accommodate multiple turbines of this size. The pattern of more complex rolling landform and narrow valleys further increases susceptibility. ***High***	Broader and more gently graded upper hill slopes and areas of flatter ground are limited in extent and while this would reduce scope to accommodate multiple turbines, this turbine type is more likely to comprise single or small groups of turbines. The pattern of more complex rolling landform and narrow valleys further increases susceptibility. ***High-medium***	Single and small groups of turbines of this size could relate to more gently graded, upper hill slopes although this size of turbine would be likely to detract from nearby more complex landform if sited on lower slopes. ***Medium***
Landcover Cultivated fields alternate with woodlands. Woodlands are often diverse comprising mixed conifers and broadleaves in valleys and forming the policies of Letterfourie, Cullen and Cairnfield Houses set on lower hill slopes.	This turbine type could impact on more diverse woodlands and parkland associated with designed landscapes and with more strongly enclosed farmland. More extensive upland pastures on upper hill slopes would be less susceptible. ***High-medium***	This turbine type could impact on more diverse woodlands and parkland associated with designed landscapes and with more strongly enclosed farmland. More extensive upland pastures on upper hill slopes would be less sensitive. ***High-medium***	Although designed landscape features would be sensitive to all development typologies sited within their boundaries, turbines <25m would be less likely to impact on designed landscape features these features if sited nearby, where screening may be provided by landform and woodlands. Single of this size could be sited to avoid effects on more strongly patterned farmland. Larger pastures on upper hill slopes are less susceptible. ***Medium***

Rolling Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Built environment This landscape is well-settled with a regular pattern of dispersed farms and houses and small settlements such as Drybridge and Clochan tucked down on lower hill slopes. Public roads are generally very narrow and winding. The consented Aultmore and Lurg Hill wind farms located in the adjacent *Low Forested Hills* AU will be visible in close proximity from parts of this landscape.	More sparsely settled upper hill slopes would be less susceptible in terms of avoiding impact on the immediate setting of settlements. Potential cumulative effects with nearby consented wind farms increases susceptibility particularly as turbines of this size sited in this AU would be contrary to the siting rationale of larger turbines with more expansively scaled, simple and less settled upland areas. ***High-medium***	More sparsely settled upper hill slopes would be less susceptible in terms of avoiding impact on the immediate setting of settlements. Potential cumulative effects with nearby consented wind farms increases susceptibility particularly as turbines of this size sited in this AU would be contrary to the siting rationale of larger turbines with more expansively scaled, simple and less settled upland areas. Differences in turbine size, design and blade rotation speeds could exacerbate cumulative effects. ***High-medium***	More sparsely settled upper hill slopes would be less susceptible in terms of avoiding impact on the immediate setting of settlements. Turbines <25m would be clearly different from larger turbines located in adjacent upland areas thus reducing potential cumulative effects although the slopes directly below the Aultmore and Lurg Hill wind farms are of increased susceptibility. ***Medium***
Landscape context This AU comprises a small area of north-facing rolling hills and the undulating Deskford valley which fringe the *Low Forested Hills*. It forms the foreground to views of the landmark hill of Bin of Cullen. The *Coastal Farmland* abuts this landscape to the north and forms a narrow band in this area which is fringed by the *Coastal Margin.*	The adjacent *Low Forested Hills* AU generally has a simple landform and land cover and is very sparsely settled reducing susceptibility to turbines sited in this landscape. The landmark hill of the Bin of Cullen which also lies in the *Low Forested Hills* AU is of increased susceptibility to turbines sited close-by which could intrude on views and deflect from its prominence. Turbines of this size would also impact on the *Coastal Farmland*, which is well settled and open, increasing susceptibility although there would be likely to be limited effects on the *Coastal Margin* due to its visual containment and distance from this landscape. ***High-medium***	Susceptibility is similarly reduced in terms of the *Low Forested Hills* AU and while the landmark hill of the Bin of Cullen is of increased susceptibility to turbines sited close-by, there may be increased scope to locate this size of turbine to avoid intrusion. This turbine type would also have less of an effect on the *Coastal Farmland* ***Medium***	Smaller turbines could be sited to avoid intrusion on key views to the Bin of Cullen and would have minimal effects on other AUs. ***Medium-low***

Rolling Coastal Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Visual amenity There is a degree of visual containment offered by the rolling landform, incised valleys and woodlands when travelling on the narrow roads within this AU. The *Low Forested Hills* form an even and predominantly wooded low southern skyline to this landscape limiting views from settlement and roads in the south. The A98 and B9018 offer close views of this landscape and the western part of this AU is widely seen from the well-settled coastal plain.	This size of turbine would be visible in close proximity from roads and settlement within this AU, from the Bin of Cullen which is popular with walkers and also from the coastal plain to the north. Views from the *Upland Farmland* to the south would be likely to be limited due to the screening provided by the *Low Forested Hills* AU. ***High***	Turbines of this size would also be highly visible from this AU and from the coastal plain to the north and the Bin of Cullen. Views from the *Upland Farmland* to the south would be limited due to the screening provided by the *Low Forested Hills* AU. ***High***	Although this size of turbine would be visible from more open roads and elevated settlement within this landscape, there would be increased scope to site them to avoid prominent skyline locations. Smaller turbines <25m would be more likely to be partially screened by coalescing woodlands and landform in views from within this landscape and from the *Coastal Farmland* limiting their visual intrusion. ***Medium***
Landscape value The Portgordon to Cullen Coast SLA covers the lower Deskford valley in this AU. Special qualities relevant to this part of the SLA include the prominent Bin of Cullen and Cullen House and its Inventory listed GDL which provide an important setting to the coast.	Turbines of this size sited in this relatively small AU could affect views to the Bin of Cullen from the coast and the setting of Cullen House and its designed landscape. ***High-medium***	This turbine type could potentially be located to minimise effects on key qualities of the SLA. ***Medium***	There would be greater scope to site smaller turbines to avoid effects on views to the Bin of Cullen and on the designed landscape of Cullen House. ***Medium-low***
Sensitivity Turbines 100-150m: High sensitivity Turbines: 50-100m: High-medium sensitivity Turbines <50m: Medium sensitivity			

Rolling Farmland and Forest – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Scale The landform is generally rolling and includes low hills, knolls and deep valleys and this, together with extensive woodland cover, reduces openness and the scale of the landscape. A dispersed pattern of small farms and houses, enclosed fields and small woodlands, provide ready scale references. Scale increases at the transition with the *Upland Moorland and Forestry* where settlement is sparser and hill slopes broader and more gently undulating.	This turbine type would dominate the largely small to medium scale of this landscape. The consistent presence of small features, including dispersed settlement, further increases susceptibility. ***High***	This turbine type would dominate the largely small to medium scale of this landscape. The consistent presence of small features, including dispersed settlement, further increases susceptibility. ***High***	Turbines closer to the upper height band of this turbine type would appear large in relation to the scale of landform, woodlands, land cover pattern and settlement within this landscape although more expansive upper hill slopes would be less susceptible. Smaller turbines within this turbine type would have a better relationship to the scale of other landscape features. ***High-medium***
Landform This landscape has a very varied landform with extensive areas of rolling small hills, deeply incised valleys of the Lossie and Pluscarden with their broad floodplains and broader gently undulating hill slopes with occasional more rounded small hills which rise gradually to the *Upland Moorland and Forestry* to the south. More pronounced hills occur including Romach Hill in the west and the long steep-sided ridges containing the Pluscarden valley. Pockets of more complex knolly landform occur, particularly in the western parts of this AU, and narrow valleys are occasionally filled with small water bodies.	Turbines of this size would detract from the predominantly more complex rolling landform of this landscape and especially areas with smaller knolls, narrow valleys, the setting of occasional water bodies and more pronounced hills and ridges ***High***	Broader gently undulating hill slopes could more easily accommodate single and very small groups of turbines this size although smaller and more complex landform would be more susceptible. ***High-medium***	Broader gently undulating hill slopes could more easily accommodate this turbine type although even smaller turbines would detract from the more complex landform of knolls, narrow valleys with small water bodies and occasional small rounded hills. ***High-medium***
Landcover This landscape is particularly well-wooded in the west where diverse estate-influenced forests are a distinctive feature. A distinctive pattern of small pocket pastures occur within extensive	The diverse woodlands which are a key characteristic of much of this AU are susceptible to development which would affect their integrity (by removal to accommodate multiple turbines/wind	The diverse woodlands which are a key characteristic of much of this AU are susceptible to development which would affect their integrity (by removal to accommodate multiple turbines/wind	Susceptibility is reduced for smaller turbines as they could more readily be sited to avoid intrusion on open floodplain pastures, designed landscapes and more diverse

Rolling Farmland and Forest – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
woodland in this part of the AU. Steep scarp slopes are densely wooded in the Pluscarden and upper Lossie valleys, contrasting with open farmland on the broad valley floor. Areas of mixed woodland and parkland are also associated with the extensive designed landscapes of Altyre and Darnaway but also the smaller policies of Kellas and Pluscarden Abbey. Farmland is more marginal and coniferous plantations become more extensive at the transition with the *Upland Moorland and Forestry* AU to the south.	farms) and larger turbines which could detract from diverse vegetation and landcover patterns. More uniform coniferous forestry and more extensive and open semi-improved pasture on upper hill slopes is generally less susceptible. The scenic contrast between densely wooded hills and steep slopes and farmed valley floors is a key feature which could be affected by turbines sited intrusively on farmland and thus appearing to diminish their openness. The distinctive pattern of smaller pockets of farmland found in the western part of this AU could be particularly disrupted by turbines sited in these open areas. The designed landscapes are also of increased susceptibility. ***High-medium***	farms) and larger turbines which could be detractive. More uniform coniferous forestry and more extensive and open semi-improved pasture on upper hill slopes is generally less susceptible. The scenic contrast between densely wooded hills and steep slopes and farmed valley floors is a key feature which could be affected by turbines sited intrusively on farmland and thus appearing to diminish their openness. The distinctive pattern of smaller pockets of farmland found in the western part of this AU could be particularly disrupted by turbines sited in these open areas. The designed landscapes are also of increased susceptibility. ***High-medium***	woodlands. More open and simple landcover, especially more extensive grazing, would be less susceptible to this turbine type. ***Medium***
Built environment This landscape is well-settled with a regular pattern of dispersed farms and houses, and also some small settlements, and important cultural heritage features including grand houses and other estate buildings, Pluscarden Abbey and occasional distilleries. It lies close to Elgin and Forres. Settlement is sparser at the transition with the adjacent *Upland Moorland and Forestry*. Public roads are generally very narrow and winding. There is no wind farm development located in this AU although two single turbines (61m) are located on farmed upper slopes. A number of wind farms are located relatively	More sparsely settled upper hill slopes would be less sensitive in terms of avoiding impact on the immediate setting of settlements and other built features of cultural heritage interest. The prominence of the Rothes I and II wind farm in the eastern part of this AU however increases susceptibility in terms of potential cumulative effects. Turbines of this size sited in this AU would appear very large from roads and settlement and, where inter-visible with operational and consented wind farms, they could have cumulative landscape and visual	More sparsely settled upper hill slopes would be less sensitive in terms of avoiding impact on the immediate setting of settlements and other built features of cultural heritage interest. The prominence of the Rothes I and II wind farm in the eastern part of this AU increases susceptibility in terms of potential cumulative effects. Turbines of this size sited in this AU would appear large from roads and settlement but could be sited on more expansive upper hill slopes (further away from settlement and roads) and to minimise	Turbines of this size would have less of an effect on the setting of settlements and they could be sited relatively close to larger buildings. There is increased scope to site smaller turbines to minimise inter-visibility with operational and consented wind farms although the more open upper hill slopes in the eastern part of this AU and close to the upper Lossie valley are susceptible due to their closer proximity to these wind farms. Multiple turbines <25m could be sited to minimise cumulative effects as they are more likely to benefit from

Rolling Farmland and Forest – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
close to this LCT in the *Upland Moorland and Forestry* and *Open Rolling Uplands* AUs. While the Rothes I and II wind farm is seen in close proximity from the more open eastern parts of this AU, the Hill of Glaschyle and Berry Burn wind farms are very rarely visible due to the screening effect of dense woodlands and landform. The consented Meikle Hill, Kellas, Clash Gour and Kellas wind farms will increase the extent of turbines seen on the skyline of the upper Lossie valley.	effects and be perceived to conflict with the siting rationale of larger turbines in upland landscapes. ***High***	inter-visibility with the operational and consented wind farms ***High-medium***	screening by landform and woodland ***Medium***
Landscape context This landscape forms a relatively narrow band of small rolling hills, deeply incised valleys contained by prominent long ridges and undulating hill slopes between the higher hills of the *Upland Moorland and Forestry* and the low-lying coastal plain of the *Coastal Farmlands* and, in the west, either side of the Findhorn valley. The steep-sided landmark hill of Brown Muir located within the *Upland Moorland and Forestry* provides a prominent backdrop to this LCT and the long ridge and gentle dip slopes of Heldon Hill, which contains the northern side of the Pluscarden valley, backdrops the *Coastal Farmland*.	The narrowness of this landscape increases susceptibility in terms of potential effects on adjacent landscapes. Turbines of this size could impact on the *Coastal Farmland* AU which, although extensive and open, is also well-settled thus reducing scale. Although the *Upland Moorland and Forestry* has a more expansive scale which reduces susceptibility, turbines of this size sited in the eastern part of this AU could impact on the landmark hill of Brown Muir. The small-scale *Narrow Wooded Valleys* is susceptible to larger turbines visible on skylines in the western part of this AU. ***High-medium***	The narrowness of this landscape increases susceptibility in terms of potential effects on adjacent landscapes. Turbines of this size could impact on the *Coastal Farmland* AU and, if sited in the eastern part of this AU, Brown Muir hill sited in the adjacent *Upland Moorland and Forestry.* The *Narrow Wooded Valleys* AU is susceptible to larger turbines visible on skylines in the western part of this AU. There would be increased scope to site turbines towards the lower height band of this turbine type to minimise effects on adjacent landscapes. ***Medium***	Turbines of this size would have less of an impact on adjacent landscapes due to their increased ability to be screened by landform and woodland provided that the more widely visible highest hills and outer ridges in this AU were avoided. ***Medium-low***
Visual amenity Woodland and landform limits views from roads and settlement (which are largely located within valleys) within this landscape although upper hill slopes and tops provide extensive views over the *Coastal Farmland* to the Moray Firth. The	Turbines of this size would be likely to form dominant features in short-range views from settlement, roads and footpaths in this AU. They may also be more widely prominent from adjacent landscapes especially if located on the	This size of turbine, and particularly turbines towards the higher height band of this turbine type, could be locally prominent and would also be visible in wider views from surrounding landscapes if sited on higher ground.	Susceptibility is reduced to smaller turbines (and particularly those <25m) due to the screening that could be offered by the rolling landform and densely wooded character of this AU. Multiple turbines towards the upper

Rolling Farmland and Forest – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
backdrop of steeper edge slopes of the *Upland Moorland and Forestry* forms a consistent feature seen from this landscape with the hill of Brown Muir being particularly prominent. This landscape forms a narrow band of hill fringes widely visible from roads and settlement in the *Coastal Farmland* AU to the north.	highest hills and outer ridges of this AU. Multiple turbines could affect sequential views from roads in this AU. ***High***	Multiple turbines could affect sequential views from roads in this AU. ***High***	height band of this turbine type could affect sequential views from roads in this AU. ***Medium***
Landscape value *The Pluscarden Valley*, *Quarrelwood, The Findhorn Valley and Wooded Estates* and a small part of *The Spey Valley* SLAs fall within this AU. *The Pluscarden Valley* SLA is valued for its richly diverse woodlands, the contrast between wooded ridges and floodplain farmland and the setting this deeply incised and secluded valley provides to Pluscarden Abbey. The special qualities of *Quarrelwood* SLA include the setting this small hill provides to Elgin, its diverse woodland and important cultural heritage features. *The Findhorn Valley and Wooded Estates* SLA special qualities include its diverse woodlands and estate policies, distinctive built features, the strong containment and seclusion of this landscape and its popularity for recreation. The wooded hills lying in the eastern part of this AU form the backdrop to *the Spey valley* SLA.	Turbines of this size would affect the setting of cultural heritage features and the sense of seclusion associated with *The Pluscarden Valley* and *Findhorn Valley and Wooded Estates* SLAs if sited within or close-by, for example if seen on prominent skylines of ridges above these valleys. The *Quarrelwood* SLA is small in area and in terms of its relief and would be susceptible to turbines sited in and nearby which would dominate its scale, the setting it provides to Elgin and the experience of recreational users. While the wooded hills which backdrop the *Spey Valley* SLA in the eastern part of this AU are not prominent they provide an uncluttered and simple backdrop to the valley which would be compromised by large wind turbines seen in close proximity from the SLA. ***High-medium***	Turbines of this size, and particularly those towards the upper height band, would also affect special qualities within *The Pluscarden Valley* and *Findhorn Valley and Wooded Estates* and the *Quarrelwood* SLAs if sited within or close-by these designated landscapes. The wooded hills which backdrop the *Spey Valley* SLA in the eastern part of this AU could also be compromised by prominently sited turbines seen on the skyline from this SLA. ***High-medium***	There would be increased scope to site smaller turbines to avoid effects on the SLAs. Turbines of this size (and especially <25m) could potentially be located in parts of some of these SLAs without compromising their special qualities. ***Medium***
Sensitivity Turbines 100-150m: High sensitivity Turbines 50-100m: High-medium sensitivity Turbines <50m: Medium sensitivity			

Narrow Wooded Valleys – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >50m**	**Assessment of turbines <50m**
Scale The scale of the landform becomes progressively smaller as the undulations become more complex and the valley becomes narrower and more enclosed, closer to the rivers. The medium to small scale of the topography is reinforced by the low relief, with landform generally undulating between 100m and 150m in elevation, although it is lower to the north. Woodland creates considerable containment reducing the scale of the experience of this landscape and open areas of farmland within woodland are small. Trees and buildings provide consistent reference points against which size of turbines can be judged.	This size of turbine would impact on the small scale of much of this AU. In particular, this turbine type would dominate the low relief, the small-scale landform and the size of open spaces within this landscape. The consistent presence of small features – including trees and buildings – increases susceptibility. ***High***	This size of turbine would impact on the small scale of much of this AU although turbines towards the lower height band <25m high would have a less dominant effect on the scale of larger areas of open space on the broader shoulders of these valleys. ***High***
Landform Landform is particularly complex at the conjunction of the rivers and tributaries with steep slopes and incised rocky gorges. Valley sides are undulating but, in places interlocking and complex, with occasional more gently sloping fields on the shoulders of the valley.	The irregular and small-scale landforms and steep sided river valleys and their immediate setting are all sensitive to this turbine type. Larger turbines would detract from complex and dramatic landform features even if sited on more gently sloping upper slopes. ***High***	The more irregular and smaller scale landforms and the steep sided river valleys and their immediate setting are sensitive to this turbine type. More level and gentle slopes on upper valley sides would be less susceptible to turbines of this size. ***High-medium***
Landcover This landscape is strongly characterised by the variety of woodland, which ranges from extensive pine forest of different ages, to riparian woodland and wooded policies. The woodland alternates with cultivated and grazed fields, some of which are relatively small pockets and some of which are larger more extensive areas of open fields. These open spaces are frequently irregular in shape, increasing the sense of interlock. The sequential pattern of open spaces and woodland is a key quality of this landscape. The rivers are a particular feature, forming sinuous and well-defined gorges with steep sides clothed with broadleaved woodland. Feature trees are associated with some of the policy woods and designed landscapes.	The integrity and diversity of woodlands increases susceptibility particularly to multiple turbines which could involve removal of these features. The diversity of the pattern of vegetation and the importance of the open spaces within the woodland also increases susceptibility to turbines of this size which could easily dominate the open spaces and reduce the contrast between these open spaces and the forested areas. ***High***	Susceptibility would be reduced in areas with a more open and simpler landcover but even smaller turbines <25m could affect the intricate pattern of small open spaces and woodland present in many parts of this AU. ***High-medium***

Narrow Wooded Valleys – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >50m**	**Assessment of turbines <50m**
Built environment This landscape is not extensively settled, with farms and houses generally located at the edge of the open spaces overlooking the fields. Historic houses, such as Logie and Relugas, are strongly associated with the river valleys, often located to overlook dramatic stretches of gorge. There are additional buildings and built features associated with these estates, including the bridge at Relugas. The main A940 extends through the eastern side of this AU although minor roads are often narrow and winding. A small single turbine is located at Logie in this AU. The operational wind farm of Berry Burn is visible at some distance from elevated open areas of this AU. The operational Hill of Glaschyle wind farm is visible above woodland from open areas on the shoulders of the valleys and seen intermittently from the A940 and from footpaths in Findhorn gorge at closer distance than Berry Burn wind farm.	The historic buildings and their settings would be susceptible to large turbines seen in close proximity above wooded skylines. This AU is however not extensively settled and there may be opportunities to site even this size of turbine without impacting on the immediate setting of settlement. The character of some of the road network is likely to be compromised by improvements to accommodate large vehicles required to transport this turbine type. It is also unlikely that large vehicles could negotiate the historic bridges. Cumulative effects with wind farms sited in adjacent AUs, and particularly the more prominent Hill of Glashchyle wind farm, could occur from open areas of farmland and from the A940 (which forms an important scenic approach to Moray) and from well-used gorge footpaths. ***High-medium***	There are increased opportunities to site smaller turbines to avoid effects on the setting of historic buildings and their transportation would require less upgrading of narrow winding roads. Turbines towards the upper height band of this turbine type would appear large in close views and could have cumulative effects with other operational wind farms (and particularly the Hill of Glaschyle wind farm) seen above containing woodland from open areas of farmland, the A940 and gorge footpaths. ***Medium***
Landscape context These narrow deeply incised valleys are relatively self-contained. The *Rolling Farmland and Forests* forms the immediate skyline either side of these valleys while the *Upland Moorland and Forestry* and *Open Rolling Uplands* also abut the south-eastern corner of this landscape. This AU, especially to the south, is overlooked from high points, including the Knock of Braemoray and is inter-visible with the low western hills of the *Upland Moorland and Forestry*. The wooded character of this landscape merges with the adjacent *Rolling Farmland and Forests* and the valley itself extends into neighbouring Highland where it has a very similar character. This landscape forms a key 'gateway' to Moray from the south experienced from the A940 which extends over the dramatic open expanse of the Dava Moor before descending into the richly wooded valleys of the Dorback Burn and Findhorn.	This AU is relatively self-contained, with views into this type from neighbouring AUs limited by dense woodland and the valley landform. Higher hills on adjacent upland AUs to the south overlook these wooded valleys and turbines of this size sited in this AU would affect more open adjoining areas although these larger scale upland areas are generally less susceptible. Turbines of this size would impact on the approach and sense of arrival to Moray from the A940 whose scenic importance relies on the variety of landscapes experienced from the route. ***High-medium***	Susceptibility is reduced for turbines of this size (and particularly turbines towards the lower height band <25m) as they would be more likely to be partially or wholly screened by woodland and the valley landform. The approach and sense of arrival to Moray remains susceptible to intrusion. ***Medium***

Narrow Wooded Valleys – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >50m**	**Assessment of turbines <50m**
Visual amenity The woodland limits wide visibility, although there are views from the rare open spaces within this AU to the higher ground in the adjacent *Upland Moorland and Forestry*. The occasional long views, especially to the pronounced hills of *Open Rolling Uplands* and the Knock of Braemoray, a landmark hill, at the southern end of the valley, are unexpected and revelatory. Views within this AU are often intermittent due to the enclosure created primarily by woodland, but also the containment created by landform along the spine of the river valleys. Views along the rivers; from bridges and access routes; to and from the historic buildings; and from the A940, including the arrival into Moray, are all important. The wooded skyline is a prominent feature seen from footpaths in the Findhorn valley.	The woodland often screens parts of this landscape, so that views from the A940, for example, are intermittent. However, the height of this turbine type means that it is likely to appear above many of these smaller features, or encroach upon the setting of key visual features, and may be widely and consistently visible from well-used gorge footpaths, minor roads and from settlement focussed on the areas of open farmland on the valley shoulders. ***High***	Views of this height of turbine are likely to be intermittent from the A940 and other roads and reduced by the screening effects of landform and trees. Turbines towards the lower height band of this turbine type (<25m) would be less prominent and could benefit from a greater degree of screening by woodland in key views. The wooded skyline above the gorges and views from the A940 remain susceptible. ***High-medium***
Landscape value The *Findhorn Valley and Wooded Estates* SLA covers this AU. Key special qualities of this SLA include the dramatic river gorges, diverse woodlands and policy features, the popularity of the area for recreation and the strong sense of intimacy and seclusion that can be experienced in this landscape.	The sense of seclusion experienced in this landscape, and the naturalness and drama associated with the river gorges would be affected by larger turbines which would be more likely to be visible on containing skylines above the valleys. Multiple turbines sited in woodland could also diminish the integrity of woodland cover which is a key special quality of the SLA. ***High***	This turbine type could also affect the sense of seclusion in this landscape, and the sense of naturalness and drama associated with the river gorges if visible above containing skylines. Smaller turbines <25m located on more extensive open farmed and settled land on the shoulders of valley would have less of an effect on the special qualities of the SLA. ***High-medium***
Sensitivity Turbines >50m: High sensitivity Turbines <50m: High-medium sensitivity		

Broad Farmed Valley - Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment for smaller turbines <50m**
Scale The Spey valley is strongly contained in places by steep and predominantly wooded side slopes although it opens out to form a broad floodplain north of Craigellachie. It is also broader and more open south-west of Aberlour where undulating side slopes merge more gradually with adjacent uplands. The Spey Valley is well-wooded and settled with a regular pattern of farms and other buildings contributing to its small scale. Scale increases on broader upper slopes at the transition with the *Upland Moorland and Forestry* where settlement is less dense and the land cover pattern more extensive.	This turbine type would dominate the small to medium scale of much of this landscape including the more open flat floodplain of the Spey. The even dispersal of buildings and other small features across this well-settled landscape increases susceptibility to turbines of this size. ***High***	This turbine type would dominate the small to medium scale of much of this landscape including the more open flat floodplain of the Spey. Although turbines of this size could relate to broader sections of the Spey Valley on more open upper valley sides at the transition with adjacent upland AUs, the even dispersal of buildings and other small features across this well-settled landscape increases susceptibility. ***High***	Turbines towards the upper height band of this turbine type would appear large in relation to the small scale of lower slopes and narrower valley floors and the small buildings which are evenly dispersed across much of this landscape. The broader sections of the Spey Valley and less densely settled upper slopes at the transition with the adjacent upland areas would be less susceptible in terms of scale and turbines <25m could more fit with the scale of more settled middle valley sides. ***High-medium***
Landform The Spey Valley has a flat open floodplain to the north which the river meanders across. The floodplain narrows in the upper reaches of the Spey (in Moray) and is contained by steep scarp slopes. Rolling lower slopes step up to a broader more gently undulating elevated terrace in the Archiestown area and a number of tributaries cut narrow valleys in the upper Knockando area. Small, rounded hills occur on the edge of the Spey Valley and fringing the broader upland AUs.	This turbine type would detract from more distinctive landform features including more deeply incised sections of the Spey, steep scarp slopes and more complex rolling landform commonly found within the valley floor and lower slopes of the upper Spey. Turbines of this size would also detract from the strong contrast that occurs between the open flat floodplain and steep containing side slopes in the lower reaches of the Spey. More gently undulating upper slopes at the transition with the *Upland Moorland and Forestry* would be less susceptible. ***High-medium***	This turbine type would detract from more distinctive landform features including more deeply incised sections of the Spey, steep scarp slopes and more complex rolling landform commonly found within the valley floor and lower slopes of the upper Spey. Turbines of this size would also detract from the strong contrast that occurs between the open flat floodplain and steep containing side slopes in the lower reaches of the Spey. More gently undulating upper slopes at the transition with the *Upland Moorland and Forestry* would be less susceptible. ***High-medium***	Broader, more gently undulating valley sides would be less susceptible and turbines <25m could also minimise effects on more complex and dramatic landform features although the more deeply incised sections of the Spey, narrow floodplains, steep scarp slopes and areas of more the complex rolling landform remain susceptible. ***Medium***

Broad Farmed Valley - Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment for smaller turbines <50m**
Landcover This landscape is characterised by enclosed farmland (with smaller fields on lower slopes), broadleaved and coniferous woodlands including distinctive mixed policy plantings in places. The often diverse vegetation pattern reinforces the smaller scale of this landscape.	This turbine type would detract from areas with a more diverse land cover pattern although simpler and more extensive pastures on upper slopes would be less susceptible. ***Medium***	This turbine type would detract from areas with a more diverse land cover pattern although simpler and more extensive pastures on upper slopes would be less susceptible. ***Medium***	This turbine type would detract from areas with a more diverse land cover pattern although smaller turbines would have a less detractive effect if sited nearby (but not on) more complex areas of landform. Simpler and more extensive pastures on upper slopes would be less susceptible. ***Medium-low***
Built environment A well-settled landscape with a regular pattern of small towns sited next to the Spey including Aberlour, Craigellachie and Rothes and with occasional smaller settlements on upper hill slopes and side valleys. Historic houses, castles, bridges and traditional and some larger newer distillery buildings are a feature of this valley. The operational wind farms of Paul's Hill, Berry Burn, Rothes I and II and Hill of Towie located in the uplands to the north are visible, principally from the broader section of the valley between Craigellachie and Ballindalloch. The consented Paul's Hill II, Berry Burn II, Clash Gour and Rothes III developments will increase the prominence of wind turbines in this broader part of the valley and from the Upper Knockando area.	Turbines of this size could affect the setting of settlements and other historic built features. Cumulative effects would occur if turbines of this size were introduced to this AU as this would weaken the clear association of large turbines with more simple and expansive upland landscapes. Inter-visibility between operational/consented developments largely seen on upland skylines and large turbines sited in this valley would also be likely to result in significant cumulative effects. Multiple turbines of this size and/or larger groups of turbines (wind farms) would increase cumulative effects. ***High***	Turbines of this size could affect the setting of settlements and other historic built features. Cumulative effects could occur if turbines of this size, and particularly those towards the upper height band, were introduced to this AU as this would weaken the clear association of large turbines with more simple and expansive upland landscapes. Inter-visibility between operational/consented developments largely seen on upland skylines and this size of turbine (which would appear large in close views from roads and settlement) sited in this valley would also be likely to result in some significant cumulative effects. Multiple turbines of this size would increase cumulative effects. ***High***	Less settled upper valley sides would have a reduced susceptibility to smaller turbines where they could be sited away from key views to settlements and landmark built features. This turbine type could have cumulative impacts with larger turbines sited in adjacent upland character types if sited close-by. Although there is scope to site this turbine type to minimise cumulative effects, turbines towards the upper height band of this turbine type would still appear very large from settlements and roads within the Spey valley and could affect the present clear rationale of large turbines being associated with upland areas. Multiple turbines could increase cumulative effects although susceptibility would be reduced to well-sited turbines <25m ***High-medium***
Landscape context This AU is visually contained by adjacent uplands, limiting its influence on the wider	Although the *Broad Farmed Valley* has relatively limited influence on surrounding landscapes, turbines of this size sited	There may be increased opportunity to site turbines of this size, and particularly those towards the lower	Turbines of this size could detract from the setting of adjacent landmark hills if sited nearby or in key views to them.

Broad Farmed Valley - Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment for smaller turbines <50m**
landscape. However, where these uplands form distinctive high hills with steep slopes, this can create highly scenic landscapes in their juxtaposition and contrast with the richly patterned settled landscapes of this valley. This notably occurs where the upper Spey is back-dropped by Ben Aigan, Ben Rinnes and Roy's Hill which all form key 'landmark' features. The *Open Uplands with Steep Slopes* AU which is centred on Ben Rinnes, is particularly dramatic in views from the Spey valley.	within this AU would detract from the setting and key views of the landmark hills sited and the *Open Uplands with Steep Slopes* AU and could diminish the visual composition in areas where a rich scenic juxtaposition occurs between these valleys and the uplands. ***High***	height band, to minimise effects on adjacent landmark hills and on the character of the *Open Uplands with Steep Slopes* AU. Multiple turbines of this size would be likely to increase effects. ***High-medium***	This turbine type would have less of an effect in terms of landscape context where the valley is broader and backed by simpler and more gently undulating upland areas. Susceptibility would be reduced for turbines <25m as these would be less prominent particularly if multiple turbines were to be accommodated. ***Medium***
Visual amenity This is a well-settled landscape with a network of roads located within the valley floor and also on the broader valley sides of the upper Spey. This valley is well wooded and this can often screen views. The Spey Valley is a key attraction for visitors engaged in recreational activities including fishing, cycling, walking and undertaking distillery tours. The Speyside Way long distance footpath is aligned through this AU. The immediate skyline formed by upper valley sides and the outer edge hills and slopes of the adjacent upland landscapes are prominent from the valley floor but more expansive views are possible from more elevated settlement, paths (including popular routes on Ben Rinnes) and roads.	Turbines of this size would be highly visible in views across and along these valleys from roads and settlement. They would also be seen in relative proximity from more elevated views from popular hill walking routes and also from sections of the Speyside Way. The well-settled nature of this valley and its popularity for tourism and recreation increases susceptibility sensitivity. ***High***	Turbines of this size would be highly visible in views across and along these valleys from roads and settlement. They would also be seen in relative proximity from more elevated views from popular hill walking routes and also from sections of the Speyside Way. The well-settled nature of this valley and its popularity for tourism and recreation increases visual sensitivity. ***High***	Turbines of this size would be significantly larger than other landscape features and could be prominent if sited within the more densely settled and traversed lower valley areas. They would be likely to be less intrusive if sited on upper valley sides at the transition with adjacent uplands where rising ground could reduce visual prominence in key views from key roads and settlement. Turbines <25m high would minimise intrusion. ***High-medium***
Landscape value The majority of this AU is designated as the *Spey Valley* SLA and it also lies adjacent to	Turbines of this size would be likely to have a significant effect on the scenic quality of the Spey Valley SLA including	Turbines of this size would be likely to have a significant effect on the scenic quality of the Spey Valley SLA including	Well-sited turbines, and particularly those towards the lower height band of this turbine type <25m, would be less

Broad Farmed Valley - Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment for smaller turbines <50m**
the *Ben Rinnes* SLA. These SLAs are interlinked with the high and rugged mountain of Ben Rinnes noted in citations as forming an important landmark feature which contributes to the scenic character of the Spey valley. The romance associated with whisky distilling is also noted as a special quality.	detracting from the dramatic backdrop provided by Ben Rinnes. The romance associated with the Spey valley and whisky distilling could also be diminished by very large and intrusive turbines. ***High***	detracting from the dramatic backdrop provided by Ben Rinnes. The romance associated with the Spey valley and whisky distilling could also be diminished by large and intrusive turbines. ***High***	likely to significantly impact on the scenic qualities of the Spey Valley SLA and on the dramatic backdrop provided by Ben Rinnes and would also be less likely to affect the sense of romance that may be experienced by some people particularly if turbines were carefully sited to minimise visibility from key tourist routes and destinations. Multiple turbines towards the upper height band would increase effects. ***High-medium***
Sensitivity Turbines 100-150m: High Turbines 50-100m: High Turbines <50m: High-medium			

Narrow Farmed Valleys – Detailed sensitivity assessment		
Summary description	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Scale These narrow valleys are strongly contained by adjacent upland areas. The upper Isla, Glen Fiddich and the Deveron form winding valleys which limit visibility and give an intimate scale in places. Glen Rinnes is broader and more open in character but dramatically contained by steep slopes and high hills. The often, well-wooded character of these valleys and the presence of small houses and farms further reduce scale.	Turbines of this height would dominate the small scale of these often narrow, strongly contained and well-settled valleys. ***High***	This turbine type would dominate the small scale of these valleys where they are strongly contained by steep slopes within the valley floor and lower slopes. Turbines of this size would appear large in relation to houses and woodlands. There are few less well-settled areas within these valleys although gently graded upper hill slopes at the transition with adjacent uplands would be less susceptible. Multiple turbines towards the upper height band associated with a number of land holdings could appear to 'fill' the narrow extent of these valleys. Multiple turbines <25m could be accommodated more readily ***High-medium***
Landform Valley floors are generally narrow with occasional flatter floodplain areas. Steep lower slopes often give way to more rolling broader upper slopes on the south-east side of the Isla and in Glen Rinnes. Landform is more complex, with steep slopes and interlocking hills in places within the Deveron valley and between the Fiddich and the Dullan Water. Small, rounded hills and ridges on the edge of these valleys at the transition with the adjacent uplands contain and provide the backdrop to these valleys.	This turbine type would detract from areas of more complex interlocking landform, steep slopes and from the small open floodplain areas which contribute to the diversity of these landscapes. Broader, more gently undulating upper hill slopes and terraces would be less susceptible although these areas are not extensive and the numbers of turbines that could be accommodated would be limited. ***High***	Turbines would detract from areas of more complex interlocking landform, steep slopes and from the small open floodplain areas which contribute to the diversity of these landscapes. Broader, more gently undulating upper hill slopes and terraces would be less sensitive. ***High-medium***
Landcover This landscape is often richly patterned with a mix of enclosed pastures and some arable land and small woodlands. Policy woodlands, a strong pattern of shelterbelts, field trees and avenue plantings occur in the upper Isla and Deveron valleys. Small pockets of wetland and riparian woodlands are present on the floor of some of these valleys.	This turbine type would detract from more diverse areas where policy woodlands and a strong pattern of shelterbelts, field trees and avenues are present. Multiple developments of large turbines across these valleys would have a greater effect. ***High-medium***	There are opportunities for this turbine type to minimise effects on areas with a more diverse land cover pattern although multiple turbines of this size repeated across these valleys would still introduce new features that could cumulatively detract from the rich land cover pattern characteristic of these valleys. ***Medium***

Narrow Farmed Valleys – Detailed sensitivity assessment		
Summary description	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Built environment These valleys are well-settled with small villages, dispersed farms and houses and occasional grand houses and castles (including the dramatically sited Auchindoun Castle perched high above the River Fiddinch) evenly distributed across the slopes above the floodplain. Narrow winding roads are aligned through these valleys. There are no wind farm developments located in this AU although operational and consented wind farms located in adjacent upland areas are visible from parts of this AU. These include the operational Hill of Towie wind farm (and consented extension) which is prominent in views from the upper Isla valley and Glen Fiddich. The operational Dorenell is less visible from the floors of these valleys but seen from the higher slopes of Glens Rinnes and Fiddich. The operational Clashindarroch wind farm located in neighbouring Aberdeenshire is visible from parts of the upper Deveron valley. The Dorenell/Blackhillock 132kV transmission line is prominent in the area between Glens Rinnes and Fiddich.	The setting of small settlements, grand houses/castles and their designed landscapes and archaeological features would be highly susceptible to this turbine type. Cumulative effects with operational and consented wind farms located in adjacent AUs additionally increase susceptibility where these larger turbines could be perceived as diverging from the rationale of locating larger turbines with more expansive and simpler upland landscapes. Cumulative effects are most likely to affect the upper Isla and the upper Deveron valleys and parts of Glen Fiddich. Views from Ben Rinnes also increases susceptibility in relation to cumulative effects between larger turbines sited in Glen Rinnes and with the Dorenell wind farm. The presence of the 132kV line increases susceptibility in relation to cumulative effects where closely inter-visible with wind turbines sited in this AU. ***High***	The setting of small settlements, grand houses/castles and their designed landscapes would be susceptible to turbines of this size sited nearby or interrupting key views to and from these features. Turbines towards the upper height band of this turbine type would still appear large from nearby roads and settlement and cumulative effects could occur if developments were seen together or if these smaller turbines were sited on upper valley sides close to larger turbines where scale differences were obvious, creating a cluttered appearance. The presence of the 132kV line increases susceptibility in relation to cumulative effects where closely inter-visible with wind turbines sited in this AU. ***High-medium***
Landscape context These valleys have a limited influence on adjacent AUs due to their strong containment. They are seen in conjunction with the adjacent *Rolling Forested Hills* and the *Open Uplands with Steep Slopes* and *Open Uplands with Settled Glens* AUs. Where these smaller scale and more diverse valleys are juxtaposed with rugged slopes or more pronounced hills on the edges of these uplands, scenic composition is enhanced.	The containment of these valleys generally limits effects on adjacent landscapes. Turbines of this size could detract from key views to the more distinctive hills, including the landmark hills of Ben Rinnes, Meikle Conval and Little Conval, and dramatic scarp slopes within the *Open Uplands with Steep Slopes* and diminish the scenic composition with valleys such as Glen Rinnes and the Deveron valley. ***Medium***	Susceptibility is also increased in relation to the intrusion of turbines on more distinctive hills within adjoining upland areas although there is increased scope to site turbines of this size to avoid diminishing the scenic composition of the wider landscape. ***Medium-low***
Visual amenity These valleys are well-settled and also contain a number of main roads. Many of the roads form popular	Turbines of this height would be highly visible within these valleys and would be seen in relatively close proximity to settlement and roads increasing	Turbines of this height would be highly visible if sited in the lower valley areas although broader upper hill slopes set back from main concentrations of settlement and

Narrow Farmed Valleys – Detailed sensitivity assessment		
Summary description	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
tourist routes. Views beyond the valley are limited however due to their containment by adjacent upland areas. Views into these valleys are largely restricted to elevated recreational routes within nearby hills including Ben Rinnes.	susceptibility. They could interrupt key views to the landmark hills and would be visible from nearby elevated recreational routes. ***High***	main roads would be less visually sensitive. Smaller turbines would be less prominent from elevated recreational routes. ***High-medium***
Landscape value The *Deveron Valley* SLA covers the upper part of this valley in Moray (continuing into neighbouring Aberdeenshire). Special qualities of the Deveron Valley SLA include its intimate scale as well as its rich diversity and harmonious character and the scenic contrast which occurs with the simpler uplands which backdrop the more patterned and settled valley. Glens Livet and Rinnes lie within the *Ben Rinnes* SLA. The relevant special qualities of the *Ben Rinnes* SLA include the dominance of Ben Rinnes and its popularity for recreation, the tranquil and little developed character of the glens and the rich cultural heritage of the area which includes historic distilleries and the 14th century Auchindoun Castle.	Larger turbines could disrupt the harmonious character of the *Deveron Valley* SLA and conflict with its intimate scale. Turbines of this size sited in Glens Livet and Rinnes could detract from views to and from Ben Rinnes and key cultural heritage features. They could also be perceived as diminishing the little developed character of these glens particularly if turbines towards the upper height band and/or multiple turbines were used. ***High***	Even smaller turbines could disrupt the harmonious character of the *Deveron Valley* SLA and conflict with its intimate scale. There would be likely to be increased opportunities to site turbines of this size to minimise effects on views to and from Ben Rinnes and cultural heritage features. Smaller turbines and particularly those <25m could also minimise effects on the little developed character of Glens Livet and Rinnes although concentrations of turbines would need to be avoided. ***High-medium***
Sensitivity Turbines 50-100m: High sensitivity Turbines <50m: High-medium sensitivity		

Upland Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Scale The gently undulating and shallow valleys of this AU are expansive and open although the presence of a regular pattern of small farms and houses provide ready scale references and reduce the overall scale of the landscape. Some narrower and more contained valleys occur in places and small, well-defined hills are occasional features.	Although this turbine type could relate to the broad scale of the generally gently undulating landform, it would dominate small houses and farms. The more contained valley floors, including the valley of the River Isla and the relatively small hills which occasionally occur, would additionally be susceptible to this turbine type. ***High***	Turbines of this size would also dominate small houses and farms although less densely settled upper slopes would be less susceptible. The more contained valley floors, including the valley of the River Isla and the relatively small hills which occasionally occur, would additionally be susceptible to this turbine type. ***High-medium***	Turbines towards the upper height band would appear large in relation to the evenly dispersed small buildings in this well-settled AU. Susceptibility is reduced in more sparsely settled areas at the transition with the *Low Forested Hills* AU. Smaller turbines <25m would reduce impacts on scale. ***Medium***
Landform This gently undulating landscape encompasses the flat-bottomed valley of the River Isla, the broad slopes which provide its wider setting and the shallow valleys of visually insignificant tributaries running from the north which are divided by long, low ridges with gentle and smooth slopes. Occasional well-defined small hills and ridges occur - the most distinctive of these being the landmark hill of Knock Hill on the border with Aberdeenshire. The small hills of Mulderie, Cairds Wood, Garrel Hill and the ridge of Sillyean Wood also stand out within the generally gently undulating landform	This turbine type could relate to the generally simple landform of this character type although they would significantly detract from Knock Hill and from the smaller, yet distinctive, hills and ridges if sited on or close-by them. ***Medium***	This turbine type could relate to the generally simple landform of this character type although they would significantly detract from Knock Hill and from the smaller, yet distinctive, hills and ridges if sited on or close-by them. ***Medium***	This turbine type could relate to the generally simple landform of this character type although more contained valley floors and small well-defined hills remain susceptible. ***Medium-low***
Landcover This landscape has a simple land cover of large fields of pasture and some arable land. Small coniferous shelterbelts and woods pattern the farmland although it generally has an open and simple pattern.	The simple land cover pattern of this landscape reduces susceptibility. ***Low***	The simple land cover pattern of this landscape reduces susceptibility. ***Low***	The simple land cover of this landscape reduces susceptibility and smaller turbines could be more easily sited ***Low***

Upland Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
Built environment This is a relatively well-settled landscape with the settlement of Keith sited in the south. Operational single and small groups of wind turbines (70-92m high) are situated in the north-eastern part of this AU, the operational Edintore wind farm is located near Keith and high voltage transmission lines and large substations are also located close to this settlement. The consented Aultmore and Lurg Hill wind farms sited in the *Low Forested Hills* AU will be widely visible across this open landscape. The operational Hill of Towie wind farm located in the *Rolling Forested Hills* is also prominent on the skyline in views from this landscape.	Turbines of this size would exacerbate the discordant clutter of transmission lines in the area around Keith, further diminishing its landscape setting. The disparate sizes and designs of operational larger turbines sited in the north of this AU near Grange Crossroads already result in significant cumulative effects and conflict with the predominant pattern within Moray of larger typologies being associated with more expansive and simple upland landscapes. The presence of operational and consented wind farms located in the nearby *Low Forested Hills* increases susceptibility. ***High***	Turbines of this size would exacerbate the discordant clutter of transmission lines in the area around Keith, further diminishing its landscape setting. The disparate sizes and designs of operational larger turbines sited in the north of this AU near Grange Crossroads already result in significant cumulative effects and conflict with the predominant pattern within Moray of larger typologies being associated with more expansive and simple upland landscapes. The presence of operational and consented wind farms located in the nearby *Low Forested Hills* increases susceptibility. ***High***	Turbines of this size would also exacerbate the discordant clutter of transmission lines in the area around Keith if sited nearby. This turbine type could have cumulative impacts with larger turbines sited in adjacent upland AUs if sited close-by. Turbines towards the upper height band of this turbine type would still appear very large from settlements and roads within this landscape and could exacerbate cumulative effects in some parts of this landscape – smaller turbines <25m would have a clear size differential with operational and consented turbines and could be accommodated more easily ***High-medium***
Landscape context This character type is contained by the higher ground of the adjacent *Low Forested Hills* AU and has limited inter-visibility and influence on wider landscape character, including neighbouring Aberdeenshire. Although the adjoining *Low Forested Hills* AU is generally sparsely settled and densely forested, thus limiting views to the *Upland Farmland*, it includes the landmark hills of the Bin of Cullen and Meikle Balloch which are popular for recreation.	This landscape has little influence on surrounding landscapes. Turbines of this size would however appear to diminish the vertical scale and detract from more distinctive defined landmark hills if sited close-by. ***Medium***	This landscape has little influence on surrounding landscapes. Turbines of this size would however appear to diminish the vertical scale and detract from more distinctive defined landmark hills if sited close-by. ***Medium***	Turbines towards the upper height band could detract from the landmark hills within the adjacent *Low Forested Hills* if sited nearby although there are increased opportunities for this turbine type to avoid such impacts and turbines <25m would have minimal impacts ***Medium-low***
Visual amenity This is a very open landscape with long views possible from roads and elevated settlement across much of the AU.	Turbines of this height would be highly visible within this open landscape and would be seen in close proximity to settlement and roads increasing	Turbines of this height would be highly visible within this open landscape and would be seen in close proximity to settlement and roads increasing	Turbines of this height would still be prominent within this landscape. Multiple turbines of this size associated with a number of land holdings could

Upland Farmland – Detailed sensitivity assessment			
Summary description	**Assessment of turbines 100-150m**	**Assessment of turbines 50-100m**	**Assessment of turbines <50m**
The distinctive summits of Knock Hill, Meikle Balloch and Bin of Cullen (the majority of these located in the adjacent *Low Forested Hills*) form key foci in views. The shallow valleys north of the River Isla are more contained, restricting views from the B9018 and B9017. There are views of the southern and western parts of this landscape from the A95.	susceptibility. Turbines of this size could interrupt key views to focal hills within this AU and to the landmark hills of Meikle Balloch and Bin of Cullen. ***High***	susceptibility. Turbines of this size could interrupt key views to focal hills within this AU and to the landmark hills of Meikle Balloch and Bin of Cullen. ***High***	have significant effects on views as this landscape is open and highly visible from settlement and major roads. Turbines of this size could interrupt key views to focal and landmark hills if sited on or close-by these features. Turbines <25m high would be less intrusive particularly if multiple turbines were accommodated. ***High-medium***
Landscape value A small part of the *Deveron Valley* SLA covers the south-eastern corner of this AU. The special qualities of this SLA include the harmonious character of farmland and woodlands, its intimate scale and the sense of seclusion that can be experienced in this landscape. This AU does not directly adjoin or influence other SLAs. The distinctive Knock Hill located in this AU is popular with walkers.	Larger turbines sited within or close to the Deveron Valley SLA so visible on immediate skylines would be likely to impact on its intimate scale and seclusion. The majority of this AU is less valued although turbines would need to be sited well away from Knock Hill. ***Medium-low***	Larger turbines sited within or close to the Deveron Valley SLA so visible on immediate skylines would be likely to impact on its intimate scale and seclusion. The majority of this AU is less valued although turbines would need to be sited well away from Knock Hill. ***Medium-low***	Larger turbines sited within or close to the Deveron Valley SLA so visible on immediate skylines would be likely to impact on its intimate scale and seclusion. The majority of this AU is less valued although turbines would need to be sited well away from Knock Hill. ***Medium-low***
Sensitivity Turbines 100-150m: High sensitivity Turbines 50-100m: High-medium sensitivity Turbines <50m: Medium sensitivity			

Low Forested Hills – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Scale The more expansive plateaux and broad ridges have a large-scale but this is reduced where ridges are narrower and where hills have more defined summits and are generally smaller in extent.	This turbine type could relate to broader areas of gently undulating to flat plateau although these areas are not extensive reducing scope for multiple turbines of this size. The low relief of the more defined landmark hills and the narrow ridges within this AU increases susceptibility. ***High-medium***	This turbine type would have a better relationship to the scale of more extensive plateaux and multiple turbines could potentially be accommodated. Narrow ridges and the low relief of the more defined landmark hills increases susceptiblity. ***Medium***
Landform This landscape generally features smooth, gently graded slopes and subtly rounded indistinct hill tops within broader plateaux. However, more distinctive hills with steeper slopes and defined summits also occur and include Lurg Hill and the landmark conical hills of Bin of Cullen and Meikle Balloch.	While this turbine type could relate to the generally simple landform of much of this AU, turbines of this size would significantly detract from the more defined hills which form landmark features within this landscape if sited on or close-by them. ***High-medium***	This turbine type could relate to the generally simple landform of much of this character type although turbines of this size would detract from more defined hills which form landmark features within this landscape if sited on or close-by them. ***High-medium***
Landcover This landscape has a simple land cover of extensive coniferous forestry with some small areas of moorland on the summits of more defined hills and semi-improved pasture at the transition with the *Upland Farmland*	The generally simple land cover of this landscape reduces susceptibility. ***Medium-low***	The generally simple land cover of this landscape reduces susceptibility. ***Medium-low***
Built environment This is a sparsely settled landscape with only occasional small farms located on lower hill slopes. The operational Edintore wind farm occupies a farmed and forested hill to the south of Keith. The consented Aultmore wind farm will occupy one of the broader plateau-like hills within this AU and the consented Lurg Hill wind farm a more pronounced ridge. The operational and consented Hill of Towie I and II wind farm is located in the nearby *Rolling Forested Hills* and a number of operational single and very small groups of turbines <92m are in the Grange Crossroads area in the *Upland Farmland* AU.	The extent of operational and consented wind farms visible in this and surrounding AUs increases susceptibility to cumulative effects. The introduction of turbines of this size could additionally incur contrasts of scale, layout and blade rotation speed with smaller operational and consented turbines sited in this AU and in the adjacent *Upland Farmland*. Cumulative effects would principally affect views from settlement and roads in the *Upland Farmland* and views from hilltop recreational routes. ***High***	The extent of operational and consented wind farm developments in this AU increases susceptibility in terms of cumulative landscape and visual effects. Views from roads and settlement in nearby well-settled landscapes and from recreational routes on hills would be principally affected. Susceptibility would be reduced for turbines towards the lower height band of this turbine type due to their greater compatibility with the size of operational and consented turbines. ***High-medium***

Low Forested Hills – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Landscape context The elevation of this AU increases its visual influence on adjacent landscapes. This AU includes narrower ridges as well as broader plateaux although in general these upland areas are not extensive. These upland areas are important in forming a simple backdrop to more complex smaller scale settled landscapes including the *Upland Farmland*, *Broad Farmed Valley*, *Rolling Coastal Farmland* and the *Coastal Farmland*. In general, the simpler lower-lying plateaux within this AU make a lesser contribution to wider scenic character than the particularly distinctive 'landmark' hills of Bin of Cullen and Meikle Balloch. The densely wooded northern and western slopes of Whiteash Hill and the Wood of Ordiequish are additionally important in providing the setting to Gordon Castle designed landscape, Fochabers and the Spey valley.	Turbines of this size could have a significant impact on adjacent smaller scale, settled landscapes and the coast both in Moray and neighbouring Aberdeenshire due in part to the relatively limited extent of the discrete units of this AU. The more prominent hills and the western part of this AU is of increased susceptibility in terms of effects on surrounding landscapes. ***High***	Turbines of this size would be likely to have a greater impact on adjacent landscapes if sited on the western parts of this AU, on or nearby the landmark hills or in areas where the upland area is less extensive. ***High-medium***
Visual amenity Views from within this landscape are restricted due to the extensive coniferous forest covering much of these upland areas but also because few roads and settlement are present. The Bin of Cullen, Whiteash Wood and Meikle Balloch hill are popular with walkers however. This AU generally forms low and even forested skylines seen from surrounding settled and farmed landscapes – the exception to this being the landmark hills. This AU forms discrete areas of upland which are not extensive in area and are surrounded by more settled landscapes thus increasing opportunities for turbines to be seen in close proximity from roads and settlement.	Turbines would be highly intrusive if sited on or nearby the hills and woodlands popular with walkers and the landmark hills which form key foci in views. This turbine type would be likely to be very prominent in views from roads and settlement in surrounding AUs including the *Rolling Coastal Farmland, Upland Farmland* and *Broad Farmed Valley*. Lighting of turbines would be likely to extend the duration of effects. ***High***	Turbines would be highly intrusive if sited on or nearby more defined hills and woodlands which are popular with walkers and also form key foci in views. This turbine type would be likely to be prominent in views from roads and settlement in surrounding AUs including the *Rolling Coastal Farmland, Upland Farmland* and *Broad Farmed Valley*. ***High***
Landscape value The Bin of Cullen which lies in the AU is covered by the *Portgordon to Cullen Coast* SLA. The western part of this	Turbines sited on or nearby the Bin of Cullen, seen on sensitive skylines above the Cullen house designed landscape or in close proximity to the Spey valley would	Turbines sited on or nearby the Bin of Cullen, seen on sensitive skylines above the Cullen house designed landscape or in close proximity to the Spey valley would

Low Forested Hills – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
AU also lies within the Spey valley and Lower Spey and Gordon Castle Policies SLAs and the hill of Meikle Balloch near Keith features popular recreation routes. Other parts of this AU are not designated or otherwise highly valued. Key special qualities of the *Portgordon to Cullen Coast* SLA comprise the prominence of the Bin of Cullen and the setting it, and the wooded policies of Cullen House, provide to the coast. The backdrop the western forested slopes of this AU provide to the Spey valley and Fochabers and the recreational value associated with Whiteash Wood are relevant qualities of *The Spey Valley* and *Lower Spey and Gordon Castle Policies* SLAs.	significantly affect qualities of the SLAs which cover parts of this AU. Meikle Balloch hill is also sensitive to development. This AU comprises a number of distinct and separate areas and there is likely to be scope to avoid effects on valued landscapes by siting wind energy development on the less valued parts of this AU. ***Medium***	significantly affect qualities of the SLAs which cover parts of this AU. Meikle Balloch hill is also sensitive to development. This AU comprises a number of distinct and separate areas and there is likely to be scope to avoid effects on valued landscapes by siting wind energy development on the less valued parts of this AU. ***Medium***
Sensitivity Turbines >150m: High sensitivity Turbines <150m: High-medium sensitivity		

Upland Moorland and Forestry – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Scale A large scale gently undulating upland plateau rising to between 300-400m. Slightly lower hills occur on the northern edge of this AU. While this AU is not extensive in area, it lies adjacent to the similarly large-scale *Open Rolling Uplands* AU. Scale is reduced within occasional narrow glens such as the Glen of Rothes and at the transition with the upper Lossie Valley and the Spey valley where landform and landcover is more complex and settlement is present.	The expansive scale of the interior plateau reduces susceptibility although this AU is not extensive in area and turbines of this size, and particularly those towards the upper height band of this turbine type (>200m), could dominate smaller glens and valleys lying on the outer fringes of this AU. ***Medium***	The expansive scale of the interior plateau reduces susceptibility. Turbines of this size would be likely to have reduced effects on the smaller scale fringes of this AU provided they were sited within the interior of the broader parts of these uplands. ***Medium-low***
Landform These uplands form a simple undulating plateau with broad gentle slopes, shallow basins and rounded summits. Landform is more complex at the transition with the *Rolling Farmland and Forests* to the south-west of Dallas where incised valleys, more knolly topography and lochans occur. The narrow and incised Glen of Rothes and steep-sided and pronounced hills of Mill Buie, Brown Muir and Carn na Cailliche form landmark features on the edges of this AU.	The predominantly simple landform of this gently undulating plateau reduces susceptibility. Turbines of this size would however dominate and detract from the landmark hills of Brown Muir, Mill Buie, Hunt Hill and Carn na Cailliche, the deep trough of the Glen of Rothes and pockets of more complex landform, if sited on or nearby these features. ***Medium***	The predominantly simple landform of this gently undulating plateau reduces susceptibility. Turbines of this size would detract from the landmark hills of Brown Muir, Mill Buie and Carn na Cailliche, the deep trough of the Glen of Rothes and pockets of more complex landform, if sited on or nearby these features. ***Medium***
Landcover Extensive coniferous forestry and grass/heather moorland with occasional boggy basins between hills. Enclosed farmland and small woodlands are present within the upper Lossie valley, the Upper Knockando area and Glen Rothes.	The generally simple landcover found within the interior of these uplands would be of reduced susceptibility although turbines of this size sited on the outer fringes of this AU could detract from more diverse landcover. ***Medium-low***	The generally simple landcover found within the interior of these uplands would be of reduced susceptibility although turbines of this size sited on the outer fringes of this AU could detract from more diverse landcover. ***Medium-low***
Built environment A very sparsely settled landscape with isolated farms located within the Glen of Rothes and on hill slopes above the *Broad Farmland Valley* and the *Rolling Farmlands and Forest*. The A941 and a narrow minor road cross this landscape although there is limited access within these uplands. The operational Rothes I and II and Hill of Glaschyle wind farms, the consented Meikle Hill, Clash Gour, Rothes III and Kellas wind farms, masts and power lines are located within this	The relatively sparse settlement and presence of existing and consented wind farms generally reduces susceptibility although there are few remaining areas of undeveloped ground without significant landscape and visual constraints. Additional wind farm development would be more likely to be located closer to the outer edges of the uplands with cumulative effects occurring on the *Rolling Farmland and Forest* to the north and on the *Broad Farmed Valley* of the Spey to the south	The relatively sparse settlement and presence of existing and consented wind farms generally reduces susceptibility although there are few remaining areas of undeveloped ground without significant landscape and visual constraints. Additional wind farm development would be more likely to be located closer to the outer edges of the uplands with cumulative effects occurring on the *Rolling Farmland and Forest* to the north and on the *Broad Farmed Valley* of the Spey to the south

Upland Moorland and Forestry – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
AU. The Paul's Hill and Berry Burn wind farms are operational in the adjacent *Open Rolling Upland* AU. The larger operational wind farms tend to be located in the interior of the adjoining uplands of the *Upland Moorland and Forestry* and the *Open Rolling Uplands* and this generally limits their impact on surrounding more susceptible landscape and visual receptors. The Hill of Glaschyle, Kellas and Meikle Hill wind farms are located closer to the outer edges of this AU. The consented wind farms will substantially increase wind turbines in these uplands with little remaining unconstrained ground remaining for further development	increasing the extent of development seen on prominent skylines. Contrasts with smaller turbines within operational wind farms appreciable in views from roads, settlement and recreational routes would contribute to cumulative effects. Repowering of operational wind farms located in the interior of these uplands (and which are therefore distant from roads and settlement) may reduce cumulative effects. ***High***	increasing the extent of development seen on prominent skylines. Repowering of operational wind farms located in the interior of these uplands (and which are therefore distant from roads and settlement) would reduce cumulative effects. ***High-medium***
Landscape context This landscape forms a relatively low backdrop of extensively forested and open hills to the more richly patterned and smaller scale *Rolling Farmland and Forest* to the north, the *Narrow Wooded Valley* of the Findhorn to the west and the *Broad Farmed Valley* covering the Spey valley to the south. These uplands form a distant long low ridge seen from the well-settled *Coastal Farmlands* to the north. Visibility into the interior of these uplands is limited from these surrounding landscapes. The more defined hills of Mill Buie, Brown Muir and Carn na Calliche stand out as easily recognisable and frequently visible 'landmark' hills on the edge of this AU.	Remaining undeveloped areas principally occur on the outer edges of these uplands which lie closer to more settled and smaller scale landscapes, increasing susceptibility. Turbines sited on or near the more pronounced landmark hills which lie on the periphery of this AU would affect their character and also, in some instances, their ability to screen extensive wind farm development. Very large turbines towards and over 200m high would be likely to have a greater impact on adjoining more sensitive landscapes. ***High***	Similar susceptibilities relate to the landmark hills and proximity to the Lossie and Spey valleys. Turbines of this size would be likely to reduce effects on adjoining AUs provided they were located within the limited areas of undeveloped ground located in the interior of the broader parts of these uplands. Repowering of operational wind farms located in the less sensitive interior of these uplands with turbines of this size would be likely to minimise effects on surrounding landscapes. ***High-medium***
Visual amenity This upland landscape is sparsely settled. It is crossed by two public roads; the A941 is aligned through Glen of Rothes and has restricted views while views from the single-track unclassified road between the Spey Valley and Dallas are more open and the existing Rothes I and II wind farm (and the Berry Burn and Paul's Hill wind farms in the adjacent *Open Rolling Uplands*) are visible from this route. Increased visual intrusion will be associated with the consented Clash Gour (eastern and western groups) and Rothes III wind	The sparsely settled nature of this AU and the restricted visibility of lower basins within the interior of these uplands from roads and settlement in more settled lowland areas reduces susceptibility although these areas are largely occupied by operational and consented wind farms. The remaining undeveloped outer edges and peripheral landmark hills of this AU are of increased susceptibility ***High***	The sparsely settled nature of this AU and the restricted visibility of lower basins within the interior of these uplands from roads and settlement in more settled lowland areas reduces susceptibility although these areas are largely occupied by operational and consented wind farms. The remaining undeveloped outer edges and peripheral landmark hills of this AU are of increased susceptibility ***High***

Upland Moorland and Forestry – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
farms. Forest and wind farm tracks provide access to the interior of these hills although public access is likely to be fairly limited. Views from more settled lowland areas and valleys into the interior of these uplands are restricted in places by more defined or higher 'edge' hills, such as Brown Muir, Carn na Calliche and Mill Buie. These are important in views from surrounding settled lowland areas and also visually contain operational wind farm development sited in this AU and the adjoining *Open Rolling Uplands* AU. There are views to the outer edges and skyline of this AU from the A95 and the B9102 in the Spey valley, which comprise a promoted tourist route, and the B9010 in the upper Lossie valley and from settlement and recreational routes in these valleys.		
Landscape value A very small part of this AU lies within the *Findhorn Valley and Wooded Estates* SLA and comprises the lower, wooded hills lying on the eastern edge of the Altyre policies. The smaller hills on the western edge of this AU form a backdrop to the Findhorn valley visible from occasional open spaces in the SLA. This AU does not form a focus for recreation. A relatively small part of this AU is designated SSSI for its bog habitat.	The general absence of designations and other recognised interests associated with this landscape reduces its value. The north-western part of this landscape however lies adjacent to the *Findhorn Valley and Wooded Estates* SLA which is a strongly contained and intimately scaled landscape sensitive to intrusion from large scale infrastructure. ***Medium-low***	The general absence of designations and other recognised interests associated with this landscape reduces its value. The north-western part of this landscape however lies adjacent to the *Findhorn Valley and Wooded Estates* SLA which is a strongly contained and intimately scaled landscape sensitive to intrusion from large scale infrastructure. ***Medium-low***
Sensitivity Turbines >150m: High sensitivity Turbines <150m: High-medium sensitivity		

Open Rolling Uplands – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Scale A large scale gently undulating upland plateau with rounded hills rising generally to between 400-520m. The low-lying basin of Moidach More is very open and expansive. Scale is reduced within the shallow valleys of the Divie and Dorback Burn where settlement, water bodies, woodlands and enclosed farmland introduce smaller scale features. More complex knolly landform and lochans close to the headwaters of the Lossie also influence the smaller scale landscape found to the north and north-east of Carn Kitty. The similarly large scale adjacent *Upland Moorland and Forestry* AU increases the expansiveness of upland landscapes in this area.	The expansiveness of the interior plateau of this AU reduces susceptibility although smaller scale valleys and more complex landform features would be of increased susceptibility and the relief of more pronounced hills could be overwhelmed by turbines >200m sited on/nearby. ***Medium***	The expansive scale of the interior plateau reduces susceptibility. Turbines of this size would be likely to have reduced effects on the smaller scale fringes of this AU provided they were sited within the interior of the broader parts of these uplands. ***Medium-low***
Landform These uplands form a simple undulating plateau with broad gentle slopes, shallow basins, flat mosses and rounded summits. The steep-sided hills of Knock of Braemoray and Roy's Hill have a well-defined shape and some more complex areas of smaller scale knolls and lochans occur to the north of Carn Kitty.	The predominantly simple landform of low-lying basins and broad hill slopes are less susceptible although turbines of this size would detract from more pronounced higher or steep-sided hills and areas of more complex landform if sited on or near them. ***Medium***	The predominantly simple landform of low-lying basins and broad hill slopes are less susceptible although turbines of this size would detract from more pronounced higher or steep-sided hills and areas of more complex landform if sited on or near them. ***Medium***
Landcover This landscape has a predominantly simple land cover of grass/heather moorland with areas of moss and deep peat, patterned with small lochans and wetland, and occasional semi-improved fields and small coniferous woodlands within shallow valleys. Native pine woodland is a feature within the valley of the Dorback Burn	The generally simple land cover of this AU would be less susceptible although more intricately patterned landcover including lochans and wetland within Moidach More and native woodlands in the Divie and Dorback valleys are of increased susceptibility. ***Medium***	The generally simple land cover of this AU would be less susceptible although more intricately patterned landcover including lochans and wetland within Moidach More and native woodlands in the Divie and Dorback valleys are of increased susceptibility. ***Medium***
Built environment A very sparsely settled landscape with isolated farms associated with the shallow valleys of the River Divie and Dorback Burn. The A940 is aligned close to the western edge of this AU. The operational Paul's Hill I and Berry	While the presence of operational and consented wind farms in this AU reduces susceptibility, the extent of development already occupying the more central parts of these uplands increases scope for potential cumulative effects to occur on adjacent more sensitive landscapes.	While the presence of operational and consented wind farms in this AU reduces susceptibility, the extent of development already occupying the more central parts of these uplands increases scope for potential cumulative effects to occur on adjacent more sensitive landscapes.

Open Rolling Uplands – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Burn wind farms are located in this AU. The consented Clash Gour, Berry Burn II and Paul's Hill II wind farms also lie in this AU. Operational and consented wind farms in the adjoining *Upland Moorland and Forestry* AU are principally seen together with wind farms located in this AU from the Lossie valley between Knockando and Dallas, from the Knockando and Spey valley area. The Hill of Glaschyle wind farm is principally visible from the west, affecting views from the Dava Way and across the Lochindorb/Dava Moors in Highland.	Views from the *Broad Farmed Valley* of the Spey, from the Lochindorb and Dava Moor area in neighbouring Highland and seen sequentially from the Dava Way could occur particularly as this size of turbine is likely to be more prominent when seen on the skyline of these uplands even if set back into the rare remaining open spaces within the interior upland plateau. ***High***	Views from the *Broad Farmed Valley* of the Spey, from the Lochindorb and Dava Moor area in neighbouring Highland and seen sequentially from the Dava Way could occur particularly as this size of turbine is likely to be more prominent when seen on the skyline of these uplands even if set back into the rare remaining open spaces within the interior upland plateau. Repowering of operational wind farms located in the interior of these uplands (and which are therefore distant from roads and settlement) would be likely to reduce cumulative effects. ***High-medium***
Landscape context The *Open Rolling Uplands* AU extends to the south and west within neighbouring Highland Council area. The extensiveness of this landscape also increases where it adjoins the *Upland Moorland and Forestry* to the north-east and north. Within Moray, the landmark Roy's Hill forms an open and shapely backdrop to the richly patterned and smaller scale hill fringes of the *Broad Farmed Valley* to the south. These uplands also form a distant long ridge seen from the well-settled *Coastal Farmlands* to the north. The Knock of Braemoray, and to a lesser degree Carn Biorach, are prominent in views from Lochindorb/Dava Moor and the Findhorn valley on the western edge of this AU (where it occurs in Moray). Views into the interior basins and lower hills of this upland area are limited.	The landmark hills of Knock of Braemoray, Carn Biorach and Roy's Hill are of high susceptibility to very large turbines sited on or nearby them which would significantly affect the scenic backdrop these hills provide to the Spey valley, parts of the Findhorn valley and the Lochindorb/Dava Moor area. The less visible lower-lying interior of these uplands is of reduced susceptibility although extensive operational and consented wind farm development is already located in these areas. Repowering or extensions to operational wind farms in this AU with substantially larger turbines could increase the influence of development on adjoining landscapes. Development on the higher southern hills of this AU within Moray could affect views from more elevated parts of the Cairngorms National Park and its wider landscape setting with lighting of turbines potentially contributing to these effects. ***High***	Turbines sited on or near the more pronounced landmark hills of Knock of Braemoray, Carn Biorach and Roy's Hill would significantly affect the scenic backdrop these hills provide to the Spey valley, parts of the Findhorn valley and the Lochindorb/Dava Moor area. The limited visibility of the lower-lying interior of these uplands reduces susceptibility although operational and consented wind farm development is already accommodated within much of this area. Development extending on the higher southern hills of this AU within Moray could affect views from the more elevated parts of the Cairngorms National Park although the smaller (and unlit) turbines of this turbine type could reduce effects. ***High-medium***
Visual amenity This upland landscape is sparsely settled and access is generally limited. The prominent hills of the Knock of	The sparsely settled nature of this AU and restricted visibility of the lower interior hills and basin from more settled lowland areas reduces susceptibility although the	The sparsely settled nature of this AU and restricted visibility of the lower interior hills and basin from more settled lowland areas reduces susceptibility although

Open Rolling Uplands – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Braemoray and Carn Biorach are prominent in views from the A940 and the Lochindorb/Dava Moor area and restrict views into the interior of this AU. The Dava Way Trail, aligned on a former railway route, is popular with walkers and cyclists and provides rare access into the interior of this landscape. The consented Clash Gour wind farm will significantly increase the prominence of wind farm development from the Dava Way and (in combination with the consented Paul's Hill II) from the single-track road between Upper Knockando and Dallas. Roy's Hill is prominent from the Spey valley. This AU is more distant from settled lowland landscapes and valleys to the north because of the 'buffer' provided by the *Upland Moorland and Forestry* AU increasing distance from key receptors and providing some screening.	Operational wind farms sited in this AU are generally located within the upland interior and are distant from surrounding roads, recreational routes and settlement being. Consented wind farms will significantly increase intrusion from the Dava Way, parts of the Spey valley and Lochindorb in Highland as they are located closer to these areas. Turbines of this size (and particularly those around 200m and over) sited on or near more prominent hills and seen on more visible stretches of the upland skyline would increase intrusion on surrounding landscapes. Susceptibility could be reduced if operational wind turbines sited in the less visible interior of these uplands were repowered with turbines towards the lower height band of this turbine type. ***High***	Operational wind farms sited in this AU are generally located within the upland interior and are distant from surrounding roads, recreational routes and settlement being. Consented wind farms will significantly increase intrusion from the Dava Way, parts of the Spey valley and Lochindorb in Highland as they are located closer to these areas and comprise larger turbines. Development sited on or near more prominent hills and located closer to lower and more visible stretches of the upland skyline would increase intrusion on surrounding landscapes. Susceptibility would be likely to be reduced if operational wind turbines sited in the less visible interior of these uplands were repowered with turbines of this size. ***High-medium***
Landscape value No landscape designations apply to this landscape although it lies close to the *Findhorn Valley and Wooded Estates* SLA and *The Spey Valley* SLA in Moray and the *Drynachan, Lochindorb and Dava Moors* SLA in Highland Council area. The western and southern edges of this landscape (and particularly the landmark hills of Knock of Braemoray, Carn Biorach and Roy's Hill) form a scenic backdrop to these SLAs.	There is a general absence of designations and other recognised interests within this landscape. The north-western part of this landscape lies adjacent to the *Findhorn Valley and Wooded Estates* SLA which is a strongly contained and intimately scaled landscape sensitive to intrusion from large scale infrastructure. The setting provided by these uplands to SLAs lying to the west and south of this AU increases value. ***Medium***	The general absence of designations and other recognised interests associated with this landscape reduces its value. The north-western part of this landscape however lies adjacent to the *Findhorn Valley and Wooded Estates* SLA which is a strongly contained and intimately scaled landscape sensitive to intrusion from large scale infrastructure. The setting provided by these uplands to SLAs lying to the west and south of this AU increases value. ***Medium***
Sensitivity Turbines >150m: High sensitivity Turbines <150m: High-medium sensitivity		

Rolling Forested Hills – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Scale The more expansive rolling plateaux and the higher hill of Ben Aigan have a large scale although scale is reduced within narrow valleys and on lower hill slopes where farmland, buildings and smaller woodlands are present.	Turbines of this size as part of new and repowered proposals would dominate the vertical scale and limited extent of these uplands. They could also overwhelm settled and farmed upper slopes and valleys especially if located on the fringes of more expansive upland areas (which already accommodate wind farm development). Turbines towards 200m and above could additionally appear to overwhelm the relief and limited extent of Ben Aigan. ***High***	This turbine type could relate to the scale of more extensive plateaux (although much of these areas are already occupied by wind farm development). Turbines of this size would dominate settled and farmed upper slopes and valleys. ***High-medium***
Landform A prominent group of rounded hills, aligned north-east/ south-west, with relatively steep sides and conical or rounded summits, and separated by a network of long and connected valleys	This turbine type could relate to the generally simple landform of much of this AU although turbines of this size would detract from the more defined hill of Ben Aigan if sited on or close-by. ***High-medium***	This turbine type could relate to the generally simple landform of much of this AU although turbines of this size would detract from the more defined hill of Ben Aigan if sited on or close-by. ***High-medium***
Landcover This landscape has a generally simple land cover of extensive coniferous forestry with areas of heather moorland on the summits of the higher hills. Semi-improved fields of pasture are interspersed with smaller woodlands on lower slopes at the transition with the settled valleys which cut into these hills.	The simple land cover of this landscape reduces susceptibility although more patterned farmland and woodland on lower hill slopes has an increased susceptibility ***Medium-low***	The simple land cover of this landscape reduces susceptibility although more patterned farmland and woodland on lower hill slopes has an increased susceptibility ***Medium-low***
Built environment A sparsely settled upland landscape with occasional farms located on lower slopes and within valleys. The operational wind farm of Hill of Towie is located in this AU. The operational Edintore and Dorenell wind farms are sited in other AUs but lie relatively close-by. A variety of small farm turbines are located on hill slopes to the SW of the A95 in the Maggieknockater area and around Mulben in the adjacent *Upland Farmland.*	The setting of Dufftown would be susceptible to very large turbines sited on the hills which immediately surround this settlement. Turbines of this size, and particularly towards 200m and over, would be likely to increase the extent and prominence of turbines visible on sensitive skylines resulting in significant cumulative effects from roads and settlement. The narrow valley of the upper Isla would be particularly susceptible to cumulative effects of repowered, extensions and new	The setting of Dufftown would be similarly susceptible to turbines of this size sited on the hills which immediately surround this settlement. Extensions and new wind farm developments could increase the extent of turbines visible on sensitive skylines resulting in significant cumulative effects from roads and settlement. The narrow valley of the upper Isla would be particularly susceptible to cumulative effects of repowered, extensions and new development in the Hill of Towie area seen in conjunction

Rolling Forested Hills – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
	development located in the Hill of Towie area and seen in conjunction with the Edintore and Hill of Towie wind farms. This turbine type would contrast with the smaller turbines within the operational Hill of Towie wind farm if sited nearby. Repowering of this wind farm could reduce some cumulative effects. ***High***	with the Edintore and Hill of Towie wind farms. Extensions to the operational Hill of Towie wind farm featuring turbines towards the upper height band of this turbine type could result in obvious contrasts of scale between turbines. Repowering of the Hill of Towie wind farm could reduce cumulative effects. ***High-medium***
Landscape context The elevation of this AU increases its visual influence on adjacent landscapes. These hills are important in forming a backdrop to smaller scale settled landscapes including the *Upland Farmland Broad Farmed Valley* and *Narrow Farmed Valleys.* This landscape includes the landmark hill of Ben Aigan which is prominent in views from the Spey valley and also from the wider Moray coastal plain to the north.	Turbines of this size would be likely to have an increased influence on adjoining landscapes even if forming part of a repowering scheme for the Hill of Towie wind farm (which is generally located in the interior of a broader upland area and thereby more distant from surrounding settled valleys). Additional turbines of this size (forming extensions or new developments) would have a greater impact as they would be located closer to surrounding landscapes and also comprise very large turbines. The western part of this AU and the Ben Aigan area is particularly susceptible in relation to effects on the Spey valley. ***High***	Turbines of this size would be likely to impact on adjacent landscapes particularly where the upland area is less extensive or where the interior uplands are largely occupied by operational wind farm development resulting in turbines being sited on the outer edges of upland areas. The narrow western part of this AU and Ben Aigan and its immediate surrounds are of increased susceptibility due to their proximity to the Spey valley. Repowering of operational wind farm development may reduce impact although the limited extent of these uplands increases susceptibility in relation to effects on adjacent landscapes. ***High-medium***
Visual amenity Views from within this landscape are often restricted due to the coniferous forest covering slopes and smaller hills. A narrow road crosses the Hill of Towie and footpaths on Ben Aigan are well-used. This AU generally forms low forested skylines seen from surrounding settled and farmed landscapes – the exception to this is Ben Aigan which forms a landmark feature particularly in views from the Spey valley. The lower hills in the western part of this AU backdrop the Spey valley and Dufftown.	Turbines would be highly intrusive if sited on or close-by Ben Aigan which is popular with walkers and also forms a key focus in views particularly from the Spey valley. Susceptibility is also increased in the western part of this AU because of the close proximity of Ben Rinnes and the Spey valley. Turbines of this size would be likely to be very prominent in views from roads and settlement in surrounding AUs including the *Upland Farmland, Broad Farmed Valley* and the *Narrow Farmed Valleys*. The presence of operational wind farm development within the interior of the more extensive upland plateau centred on the Hill of Towie, reduces	Turbines would be highly intrusive if sited on or close-by Ben Aigan which is popular with walkers and also forms a key focus in views particularly from the Spey valley. Susceptibility is also increased in the western part of this AU because of the close proximity of Ben Rinnes and the Spey valley. This turbine type would be likely to be prominent in views from roads and settlement in surrounding AUs including the *Upland Farmland*, *Broad Farmed Valley* and the *Narrow Farmed Valleys*. The presence of operational wind farm development within the more extensive and less visually sensitive upland plateau centred on the Hill of Towie, reduces scope to site

Rolling Forested Hills – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
	scope to site additional turbines in this landscape without significant visual intrusion occurring on adjacent settled valleys. Repowering of operational wind farm development may reduce visual intrusion although the limited extent of these hills and their proximity to more sensitive landscapes increases susceptibility to this very large turbine type. Lighting of turbines would be likely to increase the duration of visual effects. ***High***	additional turbines in this landscape without significant visual intrusion on adjacent settled valleys. ***High***
Landscape value Ben Aigan lies within the *Spey Valley* SLA. Qualities of this designated area include the steep-sided slopes of this hill which backdrop the Spey valley and the prominence of its heather-capped summit. Ben Aigan is also well-used by walkers and cyclists which increases value. The smaller hills and steep slopes west of Dufftown which lie in this AU are included in the *Ben Rinnes* SLA. This area comprises the northern end of the rolling ridge which extends from Ben Rinnes and also forms the setting to the planned settlement of Dufftown. Other parts of this AU are not designated or formally valued.	Turbines of this size sited on or near Ben Aigan (within *The Spey Valley* SLA and also on upper slopes west of the A95 where they could extend above the skyline) would significantly detract from the focus provided by this prominent hill seen from the Spey valley, affecting a key quality of this SLA. Very large turbines could also diminish the experience of recreational users accessing this hill even if sited in adjacent upland areas, for example in the Hill of Towie area. Lighting of turbines could contribute to significant landscape and visual effects. Similarly, turbines sited in the upland area to the west of Dufftown would be likely to significantly encroach on the setting to Ben Rinnes, affecting views from popular recreational routes and diminishing the prominence of this hill (with consequent effects on *The Spey Valley* SLA). The setting of Dufftown and views from *The Spey Valley* SLA would also be likely to be significantly affected. ***High***	While the areas covered by both The Spey Valley and Ben Rinnes SLAs and their immediate surrounds are sensitive to development which would be seen on close skylines above the Spey valley and would be likely to detract from the prominence of Ben Rinnes and Ben Aigan, there may be increased opportunities to site turbines of this size (and particularly turbines towards the lower height band of this turbine type) to minimise intrusion on both SLAs. ***High-medium***
Sensitivity Turbines >150m: High sensitivity Turbines 100-150m: High-medium sensitivity		

Open Uplands with Steep Slopes – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Scale Large scale, strongly vertical sided long, open but often narrow ridges rise directly up from the adjacent valleys to an elevation of over 700m in the south, dropping to lower relief associated with lower ridges (487m) in the north. Ben Rinnes rises to 840m, forming the highest point of an outlying group of steep sided open hill summits. Scale is reduced by increased containment created by narrow glens and passes. Woodland and smaller topographical features, including smaller stand-alone hills which provide the backdrop to Dufftown, also reduce the scale along the transition between these slopes and adjacent valleys.	The expansiveness and relief of the higher hills and long ridges reduces susceptibility, although turbines of this size would dominate the narrow ridgelines, enclosed glens and small hills. Turbines towards the upper height band of this turbine type would also overwhelm the scale of lower uplands (for example the ridge on the east side of Glen Rinnes) where their relief is relatively low when viewed from the glens. ***High-medium***	This turbine type could relate to the general expansiveness and relief of this landscape with the exception of the narrow ridgelines, the enclosed glens and passes and smaller foothills which have an increased susceptibility. ***Medium***
Landform These uplands form relatively even ridgelines to the east of Glen Rinnes. The rugged profile formed by more complex gradients rise to the pronounced summit of Ben Rinnes to the west. The AU is dominated by steep slopes, with only occasional areas of more gentle gradients. More complex landform, including smaller hills, occur at the northern end of Glen Rinnes.	The generally complex landforms and steep slopes of this AU increase susceptibility. While turbines of this size (and particularly those towards and >200m) would have less of a detractive effect on the simple landform of long ridges and occasional more gentle slopes and gradients, these areas are not extensive increasing susceptibility to multiple turbines. ***High-medium***	The generally complex landforms and steep slopes of this AU increase susceptibility. This size of turbine (and particularly multiple turbines closer to 100m) could relate to the simple landform of long ridges and occasional gentler slopes and gradients. ***High-medium***
Landcover This landscape has a predominantly simple land cover of heather moorland across the upper slopes and summits, with occasional improved grassland fields along the lower hill slopes. These blend seamlessly with grass fields within the farmed low-lying land. Coniferous woodlands, some of which are quite extensive, and smaller shelter woods are to be found along the lower slopes.	While the generally simple land cover of this AU reduces susceptibility, the integrity of heather moorland (which is spectacular in flower) would be affected by extensive development. ***Medium***	While the generally simple land cover of this AU reduces susceptibility, the integrity of heather moorland (which is spectacular in flower) would be affected by extensive development. ***Medium***
Built environment This is a very sparsely settled landscape with isolated farms associated with the occasional sheltered valley on	Cumulative effects could principally occur on more elevated views from Ben Rinnes and other walking routes where turbines located in this AU would be seen closely	Cumulative effects could principally occur on more elevated views from Ben Rinnes and other walking routes where turbines located in this AU would be seen closely

Open Uplands with Steep Slopes – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
the periphery of the AU. There are no wind turbines or wind farms located in this AU. The extensive operational Dorenell wind farm lies on the western edge of the neighbouring *Open Uplands with Settled Glens*. The ridge along the east side of Glen Rinnes provides a visual screen to this wind farm, limiting its impact on the smaller scale settled valley of Glen Rinnes although it is prominent in views from Ben Rinnes. The Paul's Hill, Rothes I and II, the Hill of Towie, Berry Burn and Clashindarroch wind farms are also visible but lie at significantly greater distances from this AU than Dorenell.	with the Dorenell wind farm in particular. Contrasts in turbine scale with the smaller turbines of the Dorenell wind farm could be appreciated if larger turbines were located on the ridge on the eastern side of Glen Rinnes. (More strategic cumulative effects are considered under 'landscape context' below) ***Medium***	with the Dorenell wind farm in particular. Contrasts in turbine scale with the smaller turbines of the Dorenell wind farm could be appreciated if larger turbines were located on the ridge on the eastern side of Glen Rinnes. (More strategic cumulative effects are considered under 'landscape context' below) ***Medium***
Landscape context This high and rugged landscape forms the last remaining tract of uplands in Moray which does not accommodate wind farm development. Ben Rinnes and the smaller hills within this group are widely visible and easily recognisable landmark features. These hills provide an uncluttered backdrop which makes a strong contribution to the scenic qualities of the *Broad Farmed Valley* of the Spey valley and to the *Narrow Farmed Valleys* of Glen Rinnes and Glenlivet. These uplands merge with adjacent hills to the east and south within the Cairngorms National Park to create a more expansive upland landscape.	The contrast provided by this open, dramatic and little modified AU to other upland landscapes in Moray which are characterised by wind farm development increases susceptibility. The scenic contribution made by these prominent uplands to the *Broad Farmed Valley* and some of the *Narrow Farmed Valleys* AUs would be compromised by this turbine type. Turbines of this size could also affect parts of the Cairngorms National Park. The importance of Ben Rinnes and the smaller hills within this group as a widely recognisable landmark feature seen across lowland areas of Moray further increases susceptibility. ***High***	The contrast provided by this open, dramatic and little modified AU to other upland landscapes in Moray which are characterised by wind farm development increases susceptibility. The scenic contribution made by these prominent uplands to the *Broad Farmed Valley* and some of the *Narrow Farmed Valleys* AUs would be compromised by this turbine type. Turbines of this size could also affect parts of the Cairngorms National Park. The importance of Ben Rinnes and the smaller hills within this group as a widely recognisable landmark feature seen across lowland areas of Moray further increases susceptibility. ***High***
Visual amenity There is limited settlement and public road access to this area, but the summits and the high ridgelines are walking routes. Ben Rinnes is a popular, high summit (a Corbett hill) which stands above the surrounding glens offering fine views. Ben Rinnes, Meikle Conval and Little Conval also stand out as a landmark hills from elsewhere in the type, because of their distinctive shape and 'stand-alone' setting. Ben Rinnes is widely visible across Moray and	The widely visible presence of Ben Rinnes, the prominence of the lower hills and ridges seen from the glens they enclose (and also seen in close views from Ben Rinnes and other elevated recreational routes) increases susceptibility. Lighting of turbines would be likely to increase the duration of effects on views. ***High***	The widely visible presence of Ben Rinnes, the prominence of the lower hills and ridges seen from the glens they enclose (and also seen in close views from Ben Rinnes and other elevated recreational routes) increases susceptibility. Lighting of turbines would be likely to increase the duration of effects on views. ***High***

Open Uplands with Steep Slopes – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
from parts of the Highland Council area and the Cairngorms National Park.		
Landscape value This landscape falls within the *Ben Rinnes* SLA. The key special qualities of this SLA include the relatively unmodified character of the upland area, the prominence of Ben Rinnes and the focus it provides for recreation and the wider setting these uplands provide to the Cairngorms National Park.	Turbines of this size could significantly affect the prominence and dramatic landform of Ben Rinnes and the experience of using recreational routes in this area. The little modified character of the SLA would also be significant affected by development with lighting of turbines contributing to these effects. ***High***	Turbines of this size could significantly affect the prominence and dramatic landform of Ben Rinnes and the experience of using recreational routes in this area. The little modified character of the SLA would also be significant affected by development. ***High***
Sensitivity Turbines >150m high: High sensitivity Turbines 100-150m high: High sensitivity		

Open Uplands with Settled Glens – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Scale Broad, gently undulating ridges create a sense of sweeping horizontal scale emphasised by the openness and elevation of these uplands which rise generally to between 500 – 630m with occasional higher points at Cooks Cairn and The Buck. The lower-lying basin of the Cabrach is expansive, but at only 200m or so below the height of the containing hills the basin is shallow. Scale is reduced within the gently enclosed, shallow valleys of the Deveron and the Treble Burn where scattered settlement, shelter woodlands and fields introduce smaller scale features.	This turbine type could relate to the expansiveness and relief of the long ridges, although very large turbines (and particularly those towards 200m high) would significantly dominate smaller scale valleys, the shallow bowl of the Cabrach and smaller topographical features. ***High-medium***	This turbine type could relate to the expansiveness and relief of the long ridges, the shallow bowl of the Cabrach would be less susceptible to turbines of this size provided they were set back from the slopes and edges of the uplands which contain this basin. Smaller scale valleys and topographical features are of increased susceptibility. ***Medium***
Landform These uplands form undulating ridges with broad rounded slopes containing shallow valleys and bowls. Steeper slopes contain the glen of the Black Water and become more steep westwards over the Dorenell/Glen Fiddich ridge to form a transition between this AU and the neighbouring *Open Uplands with Steep Slopes* (12a) AU. The steeper sided and more pronounced summit of the Buck stands out as a landmark hill.	This turbine type could relate to the predominantly simple landform of these uplands, although the steeper western slopes are of increased susceptibility and may also require extensive earth works to accommodate tracks and platforms. The more rugged landform and conical shape of The Buck, which contrasts with the gentler undulations of nearby ridges, is more susceptible. ***Medium***	This turbine type could relate to the predominantly simple landform of these uplands, although the steeper western slopes are more susceptible and may also require extensive earth works to accommodate tracks and platforms. The more rugged landform and conical shape of The Buck, which contrasts with the gentler undulations of nearby ridges, is more susceptible. ***Medium***
Landcover This landscape has a predominantly simple land cover of heather moorland across the upper slopes and summits, with improved grassland fields along the lower hill slopes. These blend seamlessly with grass fields within the farmed low-lying land. Small coniferous shelter woodlands and occasional larger woods lie within the shallow bowls and settled glens.	The generally simple land cover of this AU would be less sensitive to turbines of this size, although the farmed glens and shallow bowls have a more complex pattern which is of increased susceptibility. ***Medium-low***	The generally simple land cover of this AU would be less sensitive to turbines of this size, although the farmed glens and shallow bowls have a more complex pattern which is of increased susceptibility. ***Medium-low***
Built environment Settlement is sparse and associated with the farmed low-lying glens and shallow basin of the Cabrach. The A941	Cumulative effects are likely to principally arise on the A941, the A920, the hill of The Buck (which is well-used by walkers) and the Cabrach area. They could also arise	Cumulative effects are likely to principally arise on the A941, the A920, The Buck (which is well-used by walkers) and the Cabrach area. They could also arise on

Open Uplands with Settled Glens – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
and A920 pass through this AU. The operational Dorenell wind farm extends along a north-south aligned ridge between the glens of Glen Fiddich and the Black Water and is prominent from the A941 in the Cabrach area but less visible from the upper Deveron Valley. The operational Clashindarroch wind farm is located in Aberdeenshire but lies close to the Moray boundary – this wind farm is visible from parts of the upper Deveron valley (the *Narrow Farmed Valleys* AU) and from more elevated ground within this AU. The Garbet wind farm is located in the northern part of this AU and is principally visible from the north-west and from higher summits such as Ben Rinnes.	on parts of the Cairngorms National Park and on the *Narrow Farmed Valleys* AU where additional development in this AU could increase the extent of development seen on prominent containing ridgelines. Very large turbines towards and >200m could additionally incur significant cumulative impacts with operational wind farms due to differences in turbine size and/or layout. ***High***	parts of the Cairngorms National Park and on the *Narrow Farmed Valleys* AU where additional development could increase the extent of development seen on containing ridgelines. ***High-medium***
Landscape context This upland landscape is larger in extent to the south. The extensiveness of this landscape also increases where it merges with *Open Uplands with Steep Slopes* to the west and with the Ladder Hills within the Cairngorms NP to the south. It becomes narrower in extent to the north, where it forms the upland edge to the smaller scale *Narrow Farmed Valleys* and well-settled farmland within Aberdeenshire. The conical, higher landmark hill of The Buck stands out in views from the surrounding area, including adjacent Aberdeenshire. The area forms dramatic gateways to Moray from Aberdeenshire, across the high passes of The Cabrach (A941) and A920 at Corsemaul. This AU contributes to the setting of the Ladder Hills and its southern boundary forms the ridgeline which encloses Glen Buchat and Braes of Glenlivet which lie within the adjacent Cairngorms National Park. The northern part of these uplands also forms the setting to Auchindoun Castle.	The Dorenell wind farm is located within the broader upland core of this AU. Remaining undeveloped parts of these uplands lie closer to more sensitive receptors including the Ben Rinnes SLA, the small-scale settled Deveron and Fiddich valleys and Auchindoun Castle increasing susceptibility. Turbines of this size, and particularly those towards and > 200m high, together with any potential visible aviation lighting, could significantly affect the wider setting of the northern Ladder Hills if located on the southern border of Moray, as well as being likely to intrude on the smaller scale, settled glen of Glen Buchat and the Braes of Glenlivet in the Cairngorms National Park. The landmark hill of The Buck could additionally be dominated by very large turbines sited on or nearby it and widely visible from Aberdeenshire. ***High***	The Dorenell wind farm is located within the broader upland core of this AU. Remaining undeveloped parts of these uplands lie closer to more sensitive receptors including the Cairngorms National Park, the Ben Rinnes SLA, the small-scale settled Deveron and Fiddich valleys and Auchindoun Castle increasing susceptibility. Limited number of turbines of this size may be able to be accommodated within the core of these uplands to avoid significant intrusion on the Ladder Hills, Glen Buchat and the Braes of Glenlivet in the Cairngorms National Park (particularly as they would not require visible lighting) and on other susceptible landscape and visual receptors in the wider area around this AU. The Buck would be highly susceptible to turbines sited on or nearby it. ***High-medium***

Open Uplands with Settled Glens – Detailed sensitivity assessment		
Summary description	**Assessment of turbines >150m**	**Assessment of turbines 100-150m**
Visual amenity The dispersed but widespread settlement is located largely on the lower lying slopes and glen floors, but the shallow sides of these glens permit long views onto the upper ridges. The threshold or 'sense of arrival' to Moray as experienced from the A941 at the Cabrach and the A920 at Corsemaul is sensitive because of the panorama revealed on cresting the top of these passes. The operational Dorenell wind farm is prominent from the A941 pass at the Cabrach and also visible elsewhere along this road. The Buck hill is widely visible from the Cabrach and parts of Aberdeenshire.	While the prominence of the Doronell wind farm reduces susceptibility to some degree additional very large turbines could significantly impact on views from the high passes along the A920 and A941 particularly as views westwards into Moray are elevated and panoramic. Views from surrounding hills, including The Buck, which is popular with walkers, increase susceptibility. Turbines of this size located on the remaining undeveloped peripheral upland areas of this AU are more likely to significantly intrude on sensitive skylines above the settled valleys lying within this and other AUs. Lighting of turbines could contribute to significant effects given the relatively dark skies characteristic of this sparsely settled landscape. ***High***	While the Doronell wind farm reduces visual susceptibility to some degree, additional large turbines could significantly impact on views from the high passes along the A920 and A941 particularly as views westwards into Moray are elevated and panoramic. Views from surrounding hills, including The Buck, which is popular with walkers, increase susceptibility. Turbines of this size located on the remaining undeveloped peripheral upland areas of this AU could intrude on sensitive skylines above the settled valleys lying within this and other AUs. ***High-medium***
Landscape value This AU lies close to the Cairngorms National Park and the *Ben Rinnes* SLA. Relevant special qualities of the Cairngorms National Park are likely to include the contribution the uplands of this AU makes to *Grand panoramas and framed views* and the character of the *Glens and Strath*s and also the *Dark Skies* of the Park. The qualities of the *Ben Rinnes* SLA include the prominence of Ben Rinnes and its popularity with walkers and the little modified character of the SLA. Auchindoun Castle and its dramatic setting is also noted in the citation for this SLA. The Cabrach is a well-known historic hill pass into Moray and The Buck is a focus for walkers.	While this AU is not covered by any landscape designations, there are recognised values associated with the Carbrach pass and The Buck hill which would be affected by turbines sited closer to these features. The proximity of this AU to the Cairngorms National Park and the Ben Rinnes SLA increases potential for significant effects to occur on the qualities of these designated areas. Turbines of this height located on higher ridges and closer to these designated areas have greater potential to incur impact by being visible on prominent skylines and affecting the little modified character of these adjoining designated areas, including the effects of illuminated turbines on the dark skies which are a special quality of the Cairngorms National Park. ***High-medium***	While this AU is not covered by any landscape designations, there are recognised values associated with the Carbrach and The Buck hill which would be affected by turbines sited closer to these features. The proximity of this AU to the Cairngorms National Park and the Ben Rinnes SLA increases potential for significant effects to occur on the qualities of these designated areas. Turbines located on higher ridges and closer to these designated areas have greater potential to incur impact by being visible on prominent skylines and affecting their character. There may be increased scope for small developments of turbines of this size to be carefully sited to minimise effects of adjacent designated landscapes. ***Medium***
Sensitivity Turbines >150m: High sensitivity Turbines 100-150m: High-medium sensitivity		

APPENDIX D: GUIDANCE ON MICRO-SITING OF SMALLER TURBINES

Appendix D: Guidance on the micro-siting of smaller turbines

Introduction

The height of turbines relative to other structures in the landscape is a key consideration in terms of landscape 'fit'. With this in mind, five types of 'small' turbines were initially considered when developing the methodology for this landscape capacity assessment. These are:

- Domestic systems — Roof/wall mounted systems
- Micro wind — Freestanding up to 12m to blade tip
- Micro-small wind turbines — 12m – 20m to blade tip
- Small wind turbine — 20m – 35m to blade tip
- Small-medium wind turbine — 35m – 50m to blade tip

Domestic systems

Domestic roof/wall mounted systems are most likely to have an impact on townscape and add to cumulative effects especially in urban areas. They have not been included in this landscape capacity assessment, as it is difficult to identify a robust list of sensitivities for this size of development which can be properly assessed at the strategic scale required for this locational guidance.

Micro wind developments

Freestanding turbines up to 12m high relate well to the size of existing buildings in the landscape, including farm buildings. These turbines are just over twice the height of a single storey house, while a two storey house is about 9m high to roof pitch. This height of turbine is also similar to small telephone masts and tall telegraph poles[1]. This size of turbine has not been included in the landscape sensitivity assessments.

A single turbine of this height is most likely to be used to contribute to the energy needs of a residential house, farm or other rural based small business. The size means that it is relatively easy to accommodate in a settled landscape, if sited to be associated with such a building cluster. It is therefore likely that any assessment of landscape sensitivity will conclude that this size of turbine could be readily accommodated – perhaps, at the most, subject to siting considerations to encourage the turbines to be located where they can be visually seen to be part of a group of buildings, or clearly linked to an individual house.

Therefore, while it is recognised that the free standing turbines of up to 12m may have cumulative effects on the landscape, they have been excluded from the landscape sensitivity assessments.

[1] Telegraph poles are available in heights from 6m to 25m, although based on site observations most appear to be 10m or less in height.

Guidance for micro-small turbines (12m – 20m in height to blade tip)

Freestanding turbines between 12m and around 20m in height to blade tip can be, at its highest, over twice the height of a two storey house. This size of turbine is therefore likely to be prominent and may appear above buildings. However, a well grown, mature forest, broadleaved or conifer tree is also about 15-20m in height. Turbines are likely to be similar in height to these trees, even more so in fertile lowland landscapes where trees often achieve good growth. Other structures of a similar height include taller communications masts and small pylons.

It is likely that proposals for this height of turbine will only come forward in settled lowland landscapes or hill fringes, and in these locations, trees and other structures will provide an appropriate scale reference. Specific landscape sensitivity assessments for this size of turbine were therefore not carried out within each of the landscape character types. Nevertheless, this size of turbine has been considered within the guidance offered in the lowland landscape sensitivity assessments carried out for this study. Generic guidance for this height of turbine is provided below.

Background

Within the Moray landscape, the following issues have been identified as being particularly influential in terms of detailed siting of this typology within character types identified as being appropriate for this typology:

- *Association with existing built development*
- *Turbine height in relation to the scale of the landscape*
- *Landform shape*
- *Settlement and land use pattern and features*
- *Visibility*
- *Potential cumulative issues*

Association with existing built development

Wherever possible, a turbine of less than 20m high will 'fit' into the landscape more successfully if it forms part of a 'cluster' of development and is visually associated with other built structures in the landscape. This is best achieved if the size of the turbine is in proportion to the size of individual features, such as buildings, trees and even pylons and other structures.

Image 1*: A turbine illustrated at an indicative 2x height of the house from this view, or a taller turbine located behind the ridge to reduce overall height from this view. The turbine is well scaled in relation to the size of other individual features. It is also located on the side of the hill, rather than the hill top, where it can be 'read' in conjunction with the farm buildings. This forms a 'cluster' of development, which reduces landscape and visual impact.*

Turbine height in relation to the scale of the landscape

Understanding scale, and the relative proportions of features in the landscape, is important in siting this typology. Landscape scale is made up of two factors, the scale of the landform and the scale of the pattern of land use.

Assessing the scale of the landform involves assessing the perceived vertical height and horizontal expanse of the topography, as well as the degree of openness and containment created by topographical relief.

The pattern of land use creates an additional layer of possible enclosure, for example where woodland, hedges and field walls provide containment. Conversely, low-growing vegetation, such as moorland, can reinforce openness. In addition, while we often assess sense of scale relative to ourselves within the landscape, individual elements, from trees to pylons, can provide reference points against which the scale of the landscape or size of other elements is perceived and understood.

In Moray, the scale of the landform is a significant factor in defining landscape character. More enclosed and steep-sided river valleys, small scale hummocky landforms and low hills, as well as more complex landform along some of the foothills, create areas of relatively small scale character. Plateau moorlands, more expansive hills, long undulating ridges are characteristic of upland areas. Relatively expansive but undulating low-lying landscape is more characteristic of the lowland farmed plains.

Trees and woodland, field pattern, settlements and farms are located on the lower fringes of the uplands, within the glens and across the farmed plains. The consistent and recurring presence of these elements creates a pattern which reduces the scale in these areas, and the individual elements provide scale reference points against which height can be judged.

As shown in Image 1 above, turbines of this height (12m – 20m) are still small enough to be sited where they can be associated with buildings and trees. Although they may be bigger than these elements, they are proportionately unlikely to be more than three times the size of

any building or tree, and within a wider landscape setting, this size relationship can usually be accommodated unless there are site-specific scale sensitivities.

On the coastal fringe, landform relief tends to be very low, with raised beaches or sand dunes, some of which are forested, forming a backdrop to the beach. Even where cliffs and more pronounced landform is present, the scale is sensitive, and a turbine can easily diminish the sense of height.

As a result, the landscape sensitivity assessment for the Coastal Fringe (1-3), concludes that turbines of no more than 20m high to blade tip are appropriate for this area. Turbines should be set back from the crest of a raised beach, promontory, cliff or other key landform feature.

Wherever possible, they should be sited where they can be associated with existing development. Buildings along the coast are often small, and even trees can be 'wind shorn' and struggle to reach full height in exposed locations. This further emphasises the need to use only small turbines in the coastal landscape, to reflect the relative size of these features.

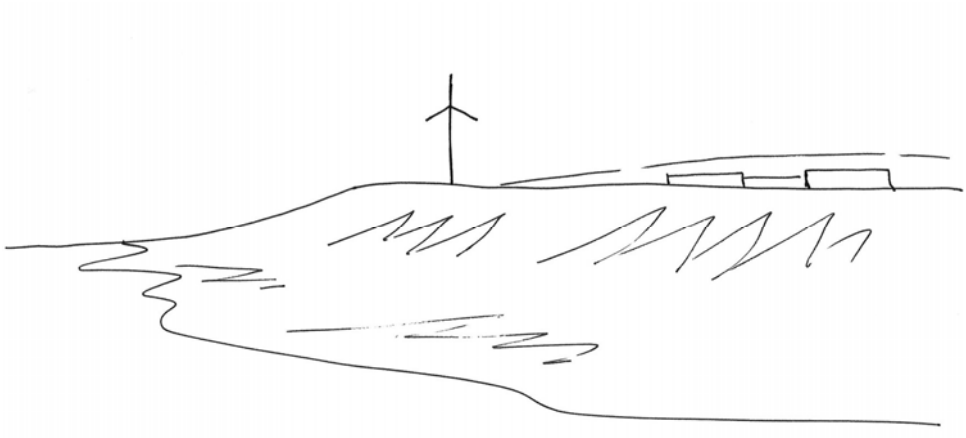


Image 2 – Coastal landscapes*: This turbine is perched on top of the raised beach and although it is quite small, instantly dominates the view and overlooks, or appears to 'hover above', the coast.*

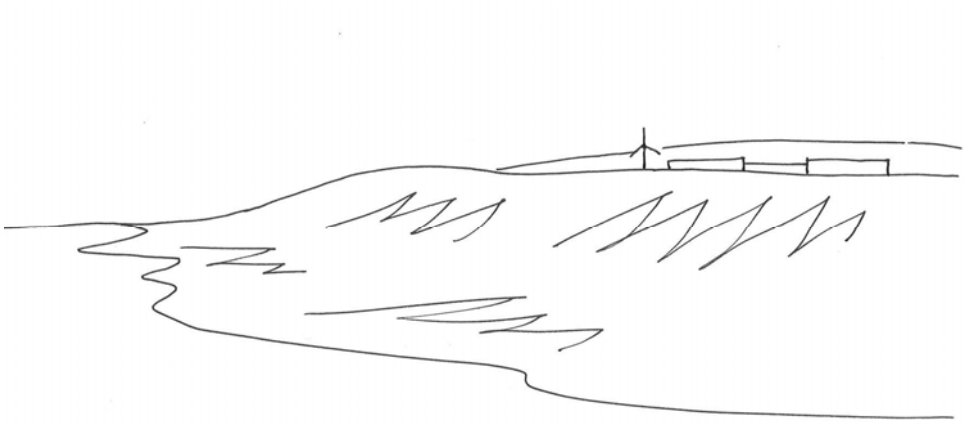


Image 3 – Coastal landscapes*: The same turbine set back from the immediate coastal edge and associated with buildings is a less intrusive impact on the coast. The buildings along the coast are often small and low, therefore smaller turbines are more acceptable in terms of relative scale.*

Landform shape

The farms and settlements where turbines of this height (12m – 20m) are most likely to be located are generally associated with lower hill slopes or valley floors. Some valleys have broad upper terraces, across which are scattered small farms, and where some of the steadings have fallen into disuse. The more extensive farmed coastal plains are gently undulating, often with subtle terraces or smaller areas of more complex landform created by deposits. There are also occasional long ridges, where settlement can extend far up the slopes, for example in *Rolling Farmland and Forests with Valleys* (5b).

These farmed slopes and valley or glen floors often have terraces, narrow ledges, folds and subtle hollows, distinct changes in gradient associated with rising slopes or dips within undulations. These changes in gradient all have the potential to create natural platforms for siting turbines of this height (12m – 20m) within the settled landscape.

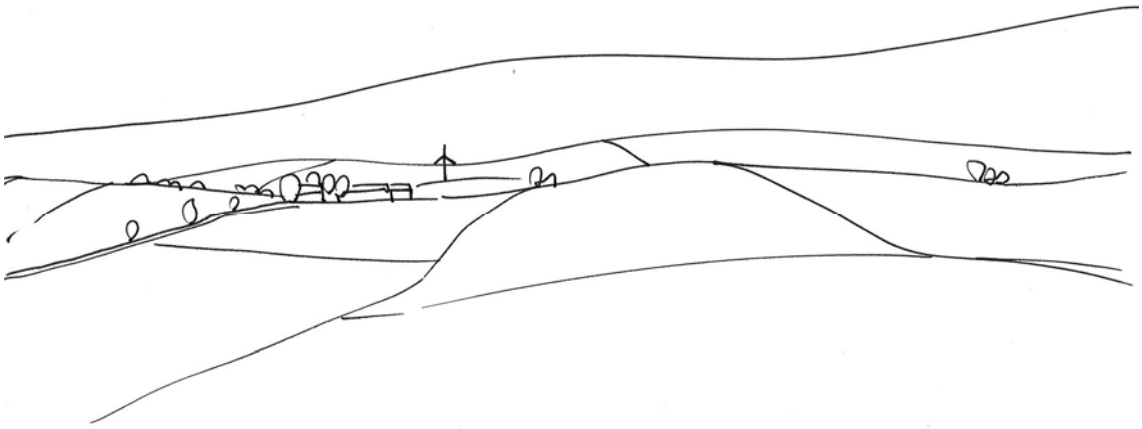


Image 4 – landform shape – locating turbines on changes of gradient*: This turbine (an indicative 2 x the size of the two storey house), is located at the distinct change in gradient close to the farm buildings. This means that the turbine reinforces the presence of the existing change of gradient or break in slope, rather than detract from it.*

When siting turbines in this landscape, avoid locating them on the tops of knolls. Side slopes of low hill and ridges, and terraces or places where there is a marked change in gradient offer good opportunities.

On the more expansive farmed landscapes – such as the Coastal Farmland (4) and the Upland Farmland (8) – landform is more subtle, with long low ridges and undulating forms, as well as occasional more pronounced ridges. Turbines of this height (12m – 20m) should aim to be linked to existing building groups, and should avoid the tops of ridges except where this is a characteristic of settlement pattern. These turbines will be more easily accommodated if they are sited on the side slopes of ridges.

Settlement and land use pattern and features

Turbines of this height (12m – 20m) are most easily accommodated in areas where there is existing settlement and other infrastructure. In such areas, the distribution of existing built development can form a recognisable pattern to which wind turbines can be visually and physically linked.

In Moray, there is frequently a clear link between settlement and landform, for example, buildings may be located at a natural break in slope, the side slopes of the glens or associated with watercourses. In more extensive farmed areas, farm buildings may be relatively evenly dispersed across the landscape. Along the coast, settlement is located on harder rocky terrain, near the mouths of rivers and sheltered coastal locations.

Larger farm buildings, industrial buildings and distilleries are also to be found in Moray, and these building groups can even include tall stacks or other masts.

While even turbines of this height (12m – 20m) may be larger than most domestic and farm buildings, it is likely to still be appropriate to establish a visual relationship between a turbine and a farm or other group of buildings in this type of landscape. It is desirable to support the existing pattern of built development, where turbines of a similar size are consistently associated with a commonly occurring detailed landform or built features associated with the farms or small settlements in an area. Note that proximity to 'regularly occupied' buildings will also need to be balanced with a noise buffer zone.

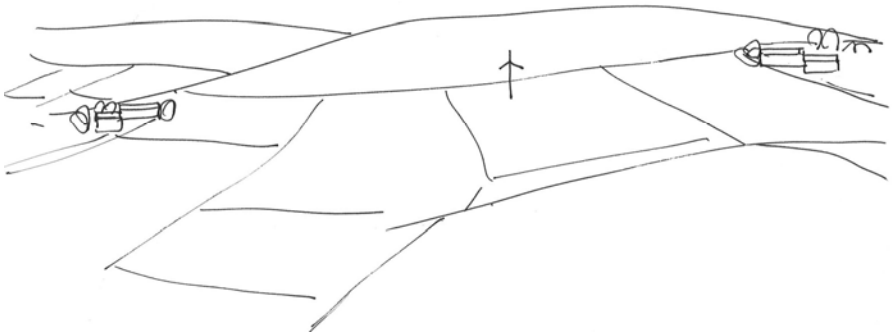


Image 5 – Poor relationship with settlement pattern*. Here a turbine is located in between two farms, and is not associated with either. It appears to 'drift' unattached in the landscape as it does not reflect the existing pattern of built development. Instead, the turbine is setting up a new pattern of development which conflicts with the existing well-established pattern.*

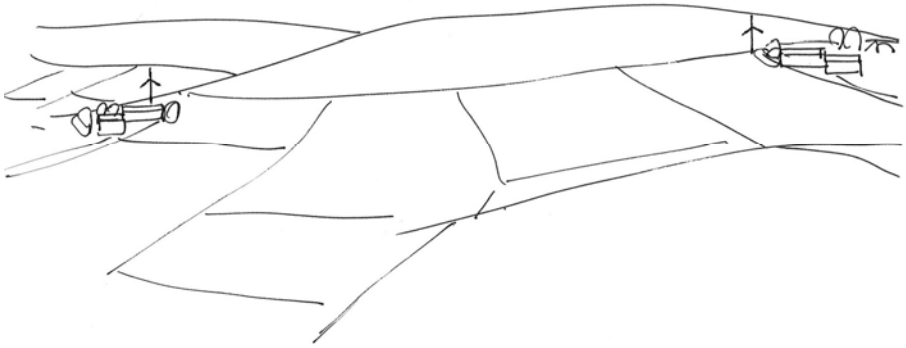


Image 6 – Strong relationship with settlement pattern*. The same landscape, with a turbine sited to each of the farms, close to the buildings, each of which now form 'building clusters'. Here the turbines reflect the existing pattern of settlement, emphasising this, rather than starting a new built pattern which conflicts with the existing pattern. Micro-siting will need to balance creating a development cluster with the need to apply a recommended 'noise buffer' zone.*

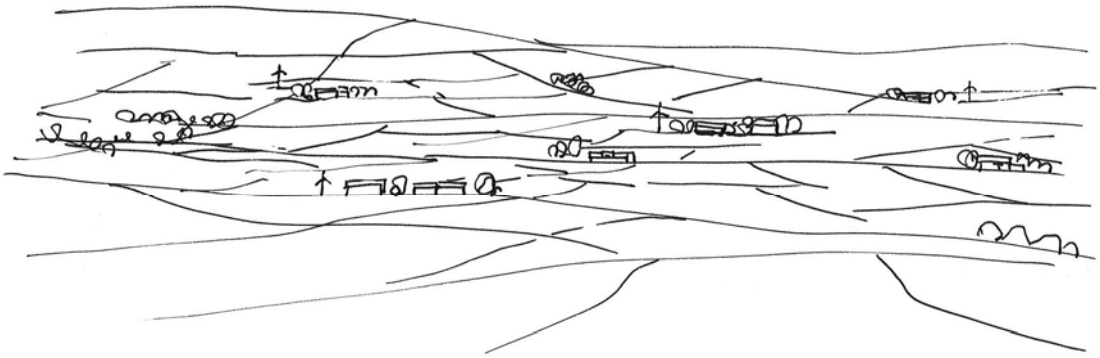


Image 7 – Settlement pattern on extensive low-lying farmed landscapes: *Most farms are located away from the top of the high ridges, and landform is relatively subtle. Micro-small turbines (12 – 20 m) can be located relatively close to buildings, to form 'clusters of development' consistently placed across the more expansive farmland areas. Consistent siting and association with existing farms will limit negative cumulative landscape effects. Micro-siting will need to balance creating a development cluster with the need to apply a recommended 'noise buffer' zone.*

In some landscapes, this consistency can be further reinforced if turbines are located at a similar elevation, especially if this relates to the existing elevation of farms, settlements or another major feature, such as the head dyke, which forms the boundary between fields and open hill ground, and is often located at a break in slope.

It is important to assess and understand the existing settlement pattern at the outset, and consider how a number of turbines could be sited in a landscape. Careful and consistent siting will limit potential negative cumulative effects on landscape character.

Visibility

Unsurprisingly, these micro-small turbines are likely to be less visible than the larger ones over a wider area. Turbines which are 20m or less are more likely to be able to be screened or partially hidden by the low ridges and more undulating landform within the settled landscapes of Moray. Tree cover, including sometimes extensive woodland, also limits visibility, although this can be sparse in more open farmed areas.

Hiding turbines *per se* is not more important than choosing a turbine of the right size in relation to landform or other landscape features, or than good micro-siting in relation to landform and settlement pattern. However, reducing sustained visibility of turbines helps limit potential cumulative visual impacts.

Siting turbines on the sides of ridges and low hills, rather than their summits and high points overall reduces visual cumulative effects – turbines are partially screened from some viewpoints to the lee of the hill and slopes in these locations. If several turbines are visible in an area, broad consistency of turbine design, height and location can help mitigate potential visual impacts.

Potential cumulative issues

Micro-small turbines may become a frequent and common occurrence in farmed landscapes. Key cumulative issues for small turbines are likely to relate strongly to potential clutter in the landscape. Issues may include:

- *Several individual, or small groups of turbines, could begin to dominate local character;*
- *The landscape could appear 'cluttered' if single or groups of turbines were associated with the majority of land holdings, especially where holdings are small and therefore closer together;*
- *Lack of a clear siting strategy could lead to fragmentation of an existing robust, recognisable, consistent and characteristic pattern of settlement, especially if turbines do not relate well to existing buildings and established pattern of built development;*
- *While one turbine breaching a skyline may be a focal point, a number of diverse structures, all spinning at different speeds – or even several of the same type of turbine – or appearing at irregular intervals along a prominent or important skyline will become a visual distraction from other landscape features or from perceived visual amenity, especially from key viewpoints;*
- *The variety of potential different types of wind turbines within the landscape could lead to clutter with different styles, sizes of structures and speeds of blade movement dotted across a landscape;*
- *There may be the added complication of increased visual clutter created by a wide range of different heights of turbine within a farmed landscape with micro-, small and small/medium sized turbines;*
- *Potential clutter may also be exacerbated if there are other masts, such as telecoms masts, overhead wires and pylons within the same vicinity*

The sensitivity assessment has assumed that single turbines and some groups of up to 3 micro-small (below 20m to blade tip) turbines are most likely to be associated with this typology and will have the most potential to be accommodated in the landscape. The assessment has also assumed that this size of turbine is most likely to be associated with farmed and settled landscapes.

Proposals for 'wind farms/crofts' of micro-small turbines over 3 in number are likely to have more significant adverse impacts on the landscape character, including on cumulative effects.

Guidance for small turbines (20m – 35m in height to blade tip)

The sensitivity of the landscape to this development scenario has been included in all assessments carried out in settled and farmed lowland landscape and coastal character types. Less settled upland landscape character types were not assessed for this size of development, as this size of turbine is associated with more settled landscapes and applications are unlikely to come forward in areas where there are no farms or other settlement.

Background

Within the Moray landscape, the following issues have been identified as being particularly influential in terms of detailed siting of this typology within character types identified as being appropriate for this typology:

- *Turbine height in relation to the scale of the landscape*
- *Landform shape*
- *Settlement and land use pattern and features*
- *Visibility*
- *Potential cumulative issues*

Turbine height in relation to the scale of the landscape

Turbines of between 20m and 35m are going to be one of the tallest structures in any Moray landscape. They are going to be taller than most buildings and trees. They are still, however, similar in height to some taller pylons and communications masts. In addition, especially on the coastal farmland, there are taller communication masts and structures associated with military activity.

Understanding scale, and the relative proportions of features in the landscape, is therefore important in siting this typology. Landscape scale is made up of two factors, the scale of the landform and the scale of the pattern of land use.

Assessing the scale of the landform involves assessing the perceived vertical height and horizontal expanse of the topography, as well as the degree of openness and containment created by topographical relief.

The pattern of land use creates an additional layer of possible enclosure, for example where woodland, hedges and field walls provide containment. Conversely, low-growing vegetation, such as moorland, can reinforce openness. In addition, while we often assess sense of scale relative to ourselves within the landscape, individual elements, from trees to pylons, can offer reference points against which the scale of the landscape or size of other elements is perceived and understood.

In Moray, the scale of the landform is a significant factor in defining landscape character. More enclosed and steep-sided river valleys, small scale hummocky landforms and low hills, as well as more complex landform along some of the foothills, create areas of relatively small scale character. Plateau moorlands, more expansive hills and long undulating ridges are characteristic of upland areas. Relatively expansive but undulating low-lying landform is more characteristic of the lowland farmed plains.

Turbines of this size (20m – 35m), even in small groups of up to three turbines, may be able to take advantage of the degree of relief created by small and medium scaled landforms, for example the broad slopes of foothills and lower fringes of upland areas, lower side slopes of valleys or the sides of undulating ridges and more subtle landforms of *Upland Farmland* (8) and the *Coastal Farmland* (4).

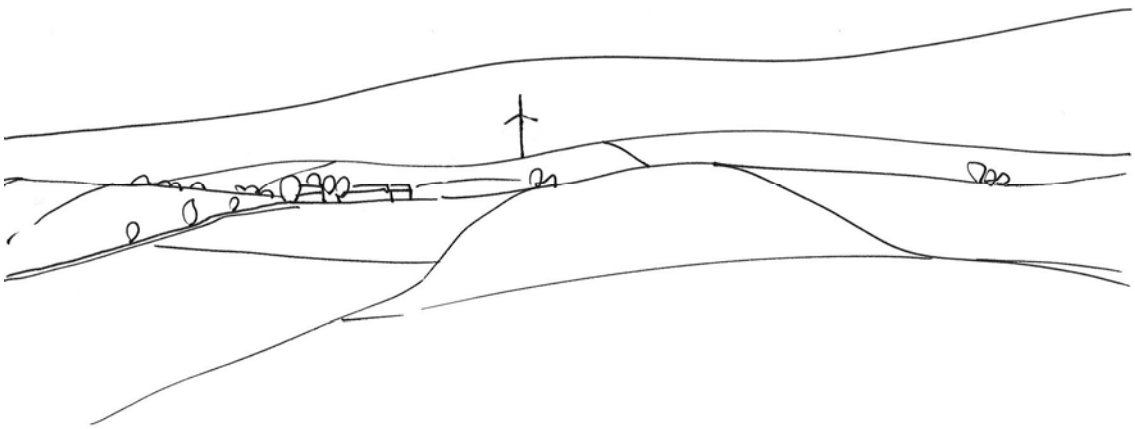


Image 8 – Landscape scale and size of features: *A 'small typology' (20m – 35m) turbine located on a low-lying ridgeline set back from but still associated with the pattern of settlement. In this location, the turbine is linked to the scale of the landform and there are no features in the immediate proximity against which to judge turbine height. It is sited at a slight dip in the ridge, and back-dropped in this view by higher ground. It is located away from the house, to avoid overwhelming the buildings in terms of scale.*

Trees and woodland, field pattern, settlements and farms are located on the lower fringes of the uplands, within the glens and across the farmed plains. The consistent and recurring presence of these elements creates a pattern which reduces the scale in these areas, and the individual elements provide scale reference points against which height can be judged. Care should be taken to site 20m – 35m high turbines where they do not dominate individual buildings, trees or other features, although some association with broad settlement pattern is still considered appropriate.

On more marginal farmed landscapes characteristic of the settled areas of Moray, buildings and tree cover are likely to be sparse and often are smaller in size than more fertile lowland farmlands. Trees may also be limited in height by exposure or poor soils and buildings are often low, either due to exposure, or due to the poorer quality farmland, which is often reflected in the characteristically more modest building style.

In these locations, the relationship between small turbines (20m – 35m) and landscape features is likely to be very sensitive, as this size of turbines could easily overwhelm the small stature and scale of individual elements which are key characteristics of these landscapes.

Where larger farm buildings, and even industrial and distillery buildings are located in more expansive landscapes or broader valleys, there are increased opportunities to site this height of turbine (20m – 35m) closer to buildings.

Overall, turbines of this height (20m – 35m) can most readily be accommodated by micro-siting them to relate to the scale of landforms or where present, larger buildings and woodlands, rather than trying to link them to the size of small structures, buildings and small trees.

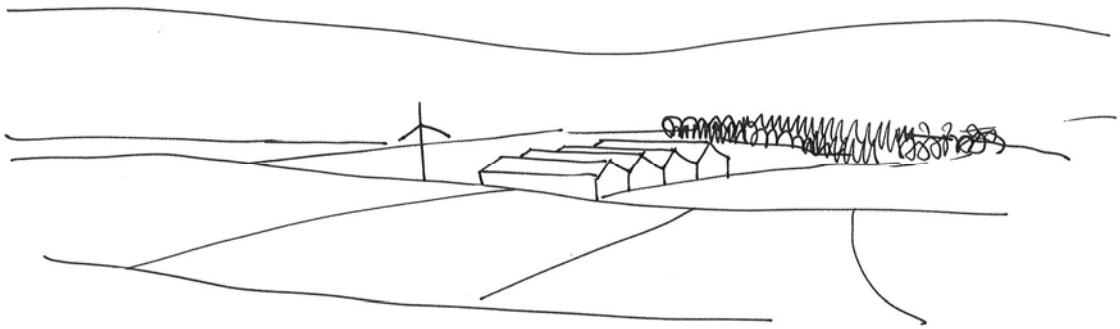


Image 9 – Landscape scale – larger buildings: *A turbine of this height (20 – 35m), could be associated with larger buildings in more simple landscapes, for example where larger woodlands are also present.*

Turbines of this height are likely to be more difficult to accommodate within very small scale and complex topography, along the floor of very narrow glens and passes, on the coast, or where small landscape scale is created by small fields, diverse land use and dense settlement pattern.

For this typology, if there is doubt about the potential impact of a turbine on the scale of the landscape, a photomontage or wireline of the turbine taken from a key viewpoint will help the assessment of potential impacts.

Landform shape

This size of turbine is more likely to fit with the landscape if they are sited to clearly relate to a specific landform. Turbines of this size could be accommodated on low hills or ridgelines across the more expansive farmed areas, or in the wider and more extensive areas of farmed valleys. Other opportunities include the rising ground which provides the immediate backdrop to the farmed lowland areas and valley floors, especially if they are back-dropped by larger hills.

Distinct changes in gradient associated with rising slopes, well defined dips within undulations or more expansive concave landforms, long ridges and interim hills along the lower edges of the foothills, as well as the edges of more expansive plateaux all provide potential opportunities for micro-siting turbines of this size.

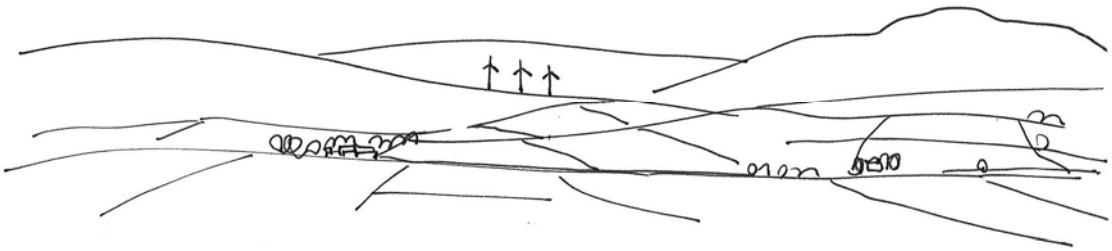


Image 10 – Landform shape and scale: *A cluster of indicative small (20 – 35m high) typology turbines located on the side of a hill, sited where there is a distinct, relatively level ridge and at a low point in the landform. The turbines have been located where they are not likely to interrupt key views of the 'landmark hills' to the right. They are also in scale with the landform, although they are at the upper end of this typology in terms of size.*

Settlement and land use pattern and features

In Moray, there is frequently a link between settlement and landform, for example, buildings may be located at a natural break in slope, the side slopes of the glens or associated with watercourses. In more extensive farmed areas, farm buildings may be relatively evenly dispersed across the landscape. Along the coast, settlement is located on harder rocky terrain, near the mouths of rivers and sheltered coastal locations.

Larger farm buildings, industrial buildings and distilleries are also to be found in Moray, and these building groups can even include tall stacks or other masts.

This height of turbine (20m – 35m height to blade tip) is larger than most buildings found in rural areas. They therefore should be sited where they can more readily be accommodated by landform scale, and avoid overshadowing or dominating smaller elements in the landscape, including small and complex landforms, small fields and settlement. It is more likely that these small sized turbines will be located on low ridges, the side slopes of hills, set slightly apart from farms or settlements.

The alignment of tracks and location of other infrastructure, as well as the turbines themselves, are also more likely to be an issue than with smaller turbine sizes.

Developing a recognisable pattern of development – for example, locating turbines at a similar elevation, and/or on similar topographical features across a landscape type will help create a pattern of development which will appear less cluttered and will also develop a distinctive and consistent landscape characteristic over time. Proximity to 'regularly occupied' buildings will need to be balanced with a noise buffer zone.

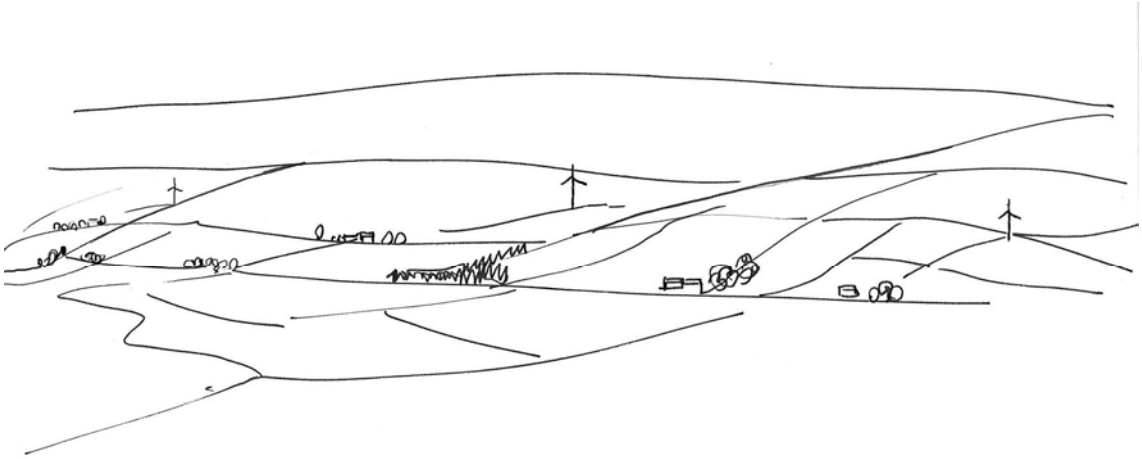


Image 11 – Developing a landscape pattern*: These indicative 35m high turbines are located at a similar elevation on this hillside. They are also loosely associated with the location of the farms. This similarity in size, location and elevation helps to maintain the unity of the landscape pattern. Consistent association with watercourses, low hills or breaks in slope, head dykes or other features will help increase unity in the landscape and reduce negative cumulative landscape effects.*

Visibility

Turbines which are more than 20m in height are taller than most trees and large farm buildings, and are therefore likely to have wider visibility than those turbines less than 20m in height.

As applicants may own farms or larger land holdings, there may be the potential to screen turbines from viewpoints if required, for example to reduce cumulative visual impacts, by establishing trees adjacent to the viewpoint (for quicker, maximum screening affect).

Potential cumulative issues

These small sized turbines may become a frequent and common occurrence, especially in farmed landscapes. Key cumulative issues are likely to relate strongly to potential clutter in the landscape and the visual relationship with other wind turbines. Issues are similar to those identified in the analysis of micro-small wind turbines, but because of the larger size of these turbines the issues are likely to occur more quickly and may include:

- *Several individual, or small groups of turbines, could begin to dominate local character;*
- *Lack of a clear siting strategy could lead to fragmentation of an existing robust and recognisable landscape pattern – where possible, it is important to site turbines on similar landforms, at similar elevations and with a similar relationship to the existing settlement pattern;*
- *Diverse designs of turbine, all spinning at different speeds – or even several turbines of the same type – strung along a prominent or important skyline could become a visual*

distraction from other landscape features or from perceived visual amenity, especially from key viewpoints;

- *The larger the turbine, the harder it is likely to be to accommodate a number of them in a single view or recognisable tract of landscape without them becoming the dominant feature. It is also harder to accommodate the turbines in a sequence of views experienced, for example, when travelling along a road;*
- *The variety of potential different types of wind turbines within the landscape could lead to clutter with different styles, sizes of structures and speeds of blade movement dotted across a landscape;*
- *Potential clutter may also be easily created if there are other masts, such as telecoms masts, overhead wires and pylons within the same vicinity;*
- *There may be the added complication of increased visual clutter created by a wide range of different heights of turbine within a farmed landscape with micro-, small and small/medium sized turbines;*
- *An additional complication may be the visual interrelationship with larger wind farms of large and medium sized turbines, especially along the upper edge of farmland adjacent to upland character types.*

Other landscape issues associated with this typology

Undergrounding electricity cables to a suitable off-site location to connect with the grid should also be undertaken in order to avoid a clutter of disparate built elements in the landscape.

Guidance for small-medium turbines (35m – 50m in height to blade tip)

The sensitivity of the landscape to this development scenario has been included in all assessments carried out in settled lowland landscape and coastal character types. Less settled upland landscape character types, however, were not assessed for this size of development, as this size of turbine is associated with more settled landscapes and applications are unlikely to come forward in areas where there are no farms or other settlements.

Background

Within the Moray landscape, the following issues have been identified as being particularly influential in terms of detailed siting of this typology within character types identified as being appropriate for this typology:

- *Turbine height in relation to the scale of the landscape*
- *Landform shape*
- *Settlement and land use pattern and features*
- *Visibility*
- *Cumulative issues*

Turbine height in relation to the scale of the landscape

Turbines of between 35m and 50m are going to often be the tallest structures in any Moray landscape. They are going to be taller than buildings and trees. They will also be taller than most communication masts and pylons, although there are some very tall masts associated with military installations on the Coastal Farmland (4) in Moray.

Understanding scale, and the relative proportions of features in the landscape, is therefore important in siting this typology. Landscape scale is made up of two factors, the scale of the landform and the scale of the pattern of land use.

Assessing the scale of the landform involves assessing the perceived vertical height and horizontal expanse of the topography, as well as the degree of openness and containment created by topographical relief.

The pattern of land use creates an additional layer of possible enclosure, for example where woodland, hedges and field walls provide containment. Conversely, low-growing vegetation, such as moorland, can reinforce openness. In addition, while we often assess sense of scale relative to ourselves within the landscape, individual elements, from trees to pylons, can offer reference points against which the scale of the landscape or size of other elements is perceived and understood.

In Moray, the scale of the landform is a significant factor in defining landscape character. More enclosed and steep-sided river valleys, small scale hummocky landforms and low hills, as well as more complex landform along some of the foothills, create areas of relatively small scale character. Plateau moorlands, more expansive hills and long undulating ridges are characteristic of upland areas. Relatively expansive but undulating low-lying landscape is more characteristic of the lowland plains.

Turbines of this height (35m – 50m) can therefore be accommodated most readily by relating the height of the turbines to the scale of the landform. If well sited, turbines of this size, even in small groups of up to three turbines, may be able to take advantage of the degree of relief created by medium scaled landforms. Examples include the broad slopes of larger scale foothills and fringes of extensive upland areas and plateaux or the transition between smaller scale farmed or settled landscapes and the edge of larger scale upland landscapes.

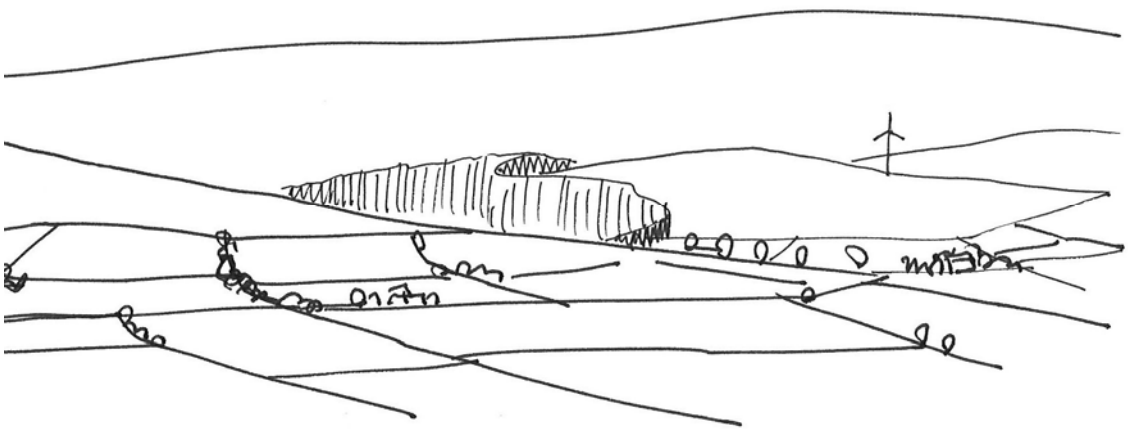


Image 12 – Landscape scale and size of features: *A 'medium-small' (35 – 50m high) turbine located where it is readily associated with the scale of the landform rather than individual features within the low-lying farmland. This size of turbine is more easily accommodated if it is not located close to farms and trees, but can be seen in the context of landform and more simple landcover, such as moorland and larger woods, for example at the transition between upland and lowland landscapes. This turbine has also been placed where it avoids the hill top, and at a clear break in slope along the ridgeline.*

Trees and woodland, field pattern, settlements and farms are located on the lower fringes of the uplands, within the glens and across the farmed plains. The consistent and recurring presence of these elements creates a pattern which reduces the scale in these areas, and the individual elements provide scale reference points against which height can be judged.

On more marginal farmed landscapes characteristic of the settled areas of Moray, buildings and tree cover are likely to be sparse and often are smaller in size than more fertile lowland farmlands. Trees may also be limited in height by exposure or poor soils and buildings are often low, either due to exposure, or due to the poorer quality farmland, which is often reflected in the characteristically more modest building style.

In settled and farmed locations, the relationship between small-medium turbines (35m – 50m) and individual smaller scale elements is likely to be very sensitive, as this size of turbines could easily overwhelm the size of individual elements, such as farms, other buildings, trees, small woods and policy features which are key characteristics of these landscapes.

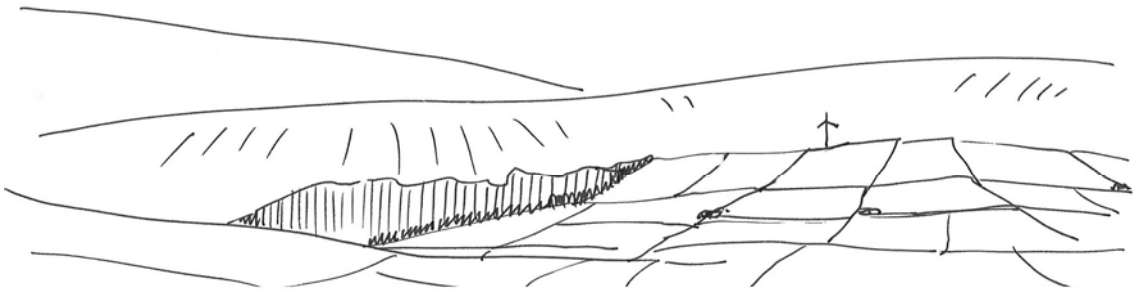
Turbines of this height (35m – 50m) can therefore be accommodated most readily by relating the height of the turbines to the scale of the landform, and away from the setting of farms, other buildings, trees and woodland, as shown in image 12 above.

For this typology, if there is doubt about the potential impact of a turbine on the scale of the landscape, a photomontage, wireline or photowire taken from a key viewpoint will help the assessment of potential impacts.

Landform shape

This size of turbine (35m - 50m to blade tip) is likely to be more readily accommodated in medium scaled landscapes or the transition between smaller scale farmed or settled landscapes and the edge of larger scale upland landscapes. In these locations, they are more likely to fit with the landscape if they are sited to clearly relate to a specific land form. Turbines of this size could be accommodated on low hills or ridgelines which provide the immediate backdrop to the farmed lowland areas, especially if they, too, are back-dropped by larger hills or more sweeping plateaux.

Distinct changes in gradient associated with rising slopes, well defined dips within undulations, natural terraces or more expansive concave landforms, long ridges, and interim hills and foothills, as well as the edges of more expansive plateaux all provide potential opportunities for micro-siting turbines of this size.



Landform shape and scale: *An indicative medium-small turbine (height 35 – 50m) shown at the break in slope at the transition between more accessible farmed land and steeper hillsides.*

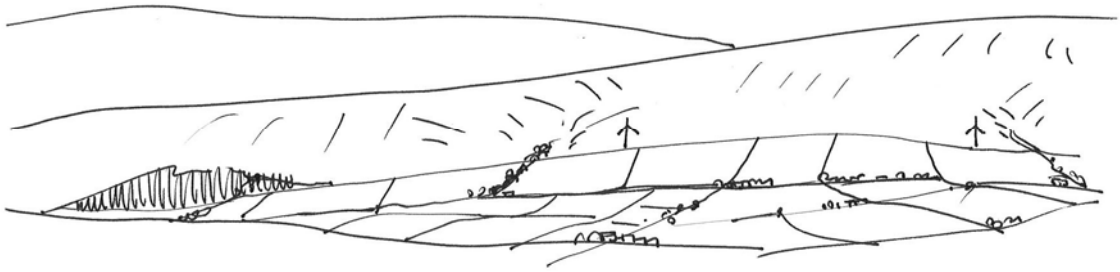
Settlement and land use pattern and features

Wherever possible, this size of turbine will 'fit' in the landscape more successfully if it is strongly associated with the scale of the landform and not individual features such as settlement. This will mean locating this typology away from the setting individual farms and buildings and woodland features.

This size of turbine (35-50m) is most likely to be accommodated where the pattern of built development becomes more sparse, for example in the upland fringe, or where farm holdings are large with very dispersed settlement pattern set within more open, large scale lowland landscapes. Other opportunities include where the pattern of fields gives way to more extensive forestry, open hills and moorland.

The alignment of tracks and location of other infrastructure, as well as the turbines themselves, are also more likely to be an issue than with smaller turbine sizes.

Developing a recognisable pattern of development – for example, locating turbines at a similar elevation, and/or on similar topographical features across a landscape type will help create a pattern of development which will appear less cluttered and will also develop a distinctive and consistent landscape characteristic over time.



Landscape pattern*: These two indicative 35-50m high turbines are located at the break in slope, reinforced by the change from field pattern to open ground. They are also broadly linked to watercourses on this hillside, therefore a pattern is emerging.*

Visibility

Turbines of this height are likely to be widely visible, as they are difficult to screen with smaller landform. Good siting is therefore very important, as the relationship with landform and wider landscape setting will be very visible.

Cumulative issues

Small-medium sized turbines may become a more common occurrence. Key cumulative issues are likely to relate strongly to potential clutter in the landscape and the visual relationship with wind farms of larger turbines or individual and small groups of small turbines. Cumulative issues may include:

- *Several individual, or small groups of turbines, could begin to dominate local character;*
- *Diverse designs of turbine, all spinning at different speeds – or even several turbines of the same type – strung along a prominent or important skyline could become a visual distraction from other landscape features or from perceived visual amenity, especially from key viewpoints;*
- *Lack of a clear siting strategy could lead to fragmentation of an existing robust and recognisable landscape pattern – where possible, it is important to site turbines on similar landforms, at similar elevations and with a similar relationship to the existing settlement pattern;*

- *The larger the turbine, the harder it is likely to be to accommodate a number of them in a single view or recognisable tract of landscape without them becoming the dominant feature. It is also harder to accommodate the turbines in a sequence of views experienced, for example, when travelling along a road;*
- *The variety of potential different types of wind turbines within the landscape could lead to clutter with different styles, sizes of structures and speeds of blade movement dotted across a landscape;*
- *Potential clutter may also be easily created if there are other masts, such as telecoms masts, overhead wires and pylons within the same vicinity – this is likely to be a bigger problem with these small turbines than larger ones;*
- *There may be the added complication of increased visual clutter created by a wide range of different heights of turbine within a farmed landscape with micro-, small and small/medium sized turbines;*
- *Other complications may be the visual interrelationship with larger wind farms of large and medium sized turbines, especially along the upper edge of farmland adjacent to upland character types.*

Other landscape issues associated with this typology

More complex landform, such as the areas of small-scale deposits and knolls will be particularly sensitive to the construction of access tracks for this size of wind turbine development. The construction of new access tracks should be minimised by careful siting of turbines to use existing tracks and to avoid more difficult or steep terrain. Care should also be taken in the alignment and design of any access tracks to ensure that sensitive landform and vegetation is not adversely affected and that intrusion on key views is avoided.

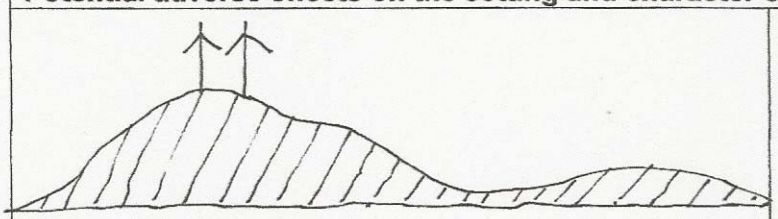
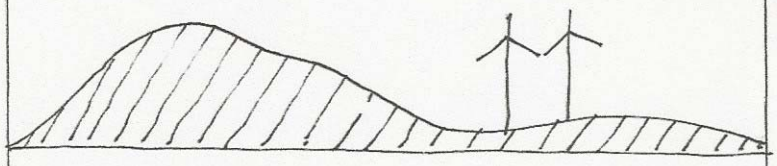
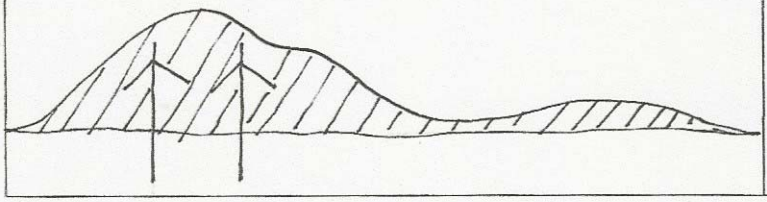
Undergrounding electricity cables to a suitable off-site location to connect with the grid should also be undertaken in order to avoid a clutter of disparate built elements in the landscape.

Appendix E: Landmark Hills

Knock Hill	A distinctive conical and isolated hill which rises out of lower-lying farmland on the border of Moray and Aberdeenshire and is widely visible across both areas.
Bin of Cullen	The shapely conical form of this hill forms a prominent feature seen widely across eastern Moray. It is important in forming an immediate backdrop to the Moray coast and to Cullen House and its designed landscape. This hill is popular with walkers and its open rocky summit (lower slopes are densely wooded) offers expansive views over the coast and the Moray Firth.
Meikle Balloch	This rounded and largely forested hill lies close to Keith. The boundary between Moray and Aberdeenshire is aligned through the summit of this hill. Footpaths and tracks on the hill are well-used and the open summit offers extensive views.
Ben Rinnes	The highest hill in Moray, classified as a 'Corbett' and thus very popular with walkers. The smaller hills of Little Conval and Meikle Conval extend from Ben Rinnes, forming a long heather-clad rolling ridge on the west side of Glen Rinnes. Ben Rinnes has a smooth and rounded form with steep slopes. A number of Tors form distinctive features on its curving ridge. This hill is important in forming the backdrop to Glen Rinnes and the Spey valley and especially dramatic views to it are possible when travelling south on the minor road from Dallas to Upper Knockando. This hill is particularly spectacular when the heather is in flower and in snowy conditions.
The Buck	The distinctive pointed profile of this hill together with its 'stand-alone' position amidst more rolling upland plateaux, contribute to the landmark status of this hill. The Buck lies on the border of Aberdeenshire and Moray and is popular with walkers, offering extensive views.
Ben Aigan	Ben Aigan rises to 471m and forms a prominent feature seen across the coastal plain of Moray and from the Spey Valley. The hill is largely forested but has an open heathery summit offering extensive views. Mountain bike trails and footpaths are well-used and the Speyside Way is aligned on the western and northern slopes of the hill.
Romach Hill and Mill Buie	These densely wooded rounded hills lie close to each other in the western part of Moray. They are most prominent when seen from longer views across the coastal plain of Moray near Findhorn and Forres where they form distinct high points along the upland backdrop.
Carn Kitty	Not widely visible but forms distinct high point within the *Open Rolling Uplands* (11) and is glimpsed from the Upper Knockando to Dallas road. This hill is surrounded by the operational wind farms of Berry Burn and Paul's Hill.
Roy's Hill	Prominent in views from the Spey Valley and tourist routes such as the A95 where its steep open heathery slopes form an immediate backdrop to the Spey and also Ballindalloch Castle designed landscape. This hill is additionally important in visually containing the Paul's Hill wind farm. Wind farm access tracks appear to be used by mountain bikers and walkers. The summit of this hill has extensive views to the Cairngorms.
Carn na Cailliche	This gently rounded hill lies on the southern edge of the *Upland Moorland and Forestry* (10) and is most prominent from the Upper Knockando area and in distant views from the A95 from the south. It is important in visually containing operational wind farm development lying at the core of this character type from the Spey Valley.
Brown Muir	Not high at 338m but prominent in views from the north across the central coastal plain of Moray due to its steep northern slopes and pronounced peaky summit (topped by a mast). This

	hill does not appear to be popular with walkers despite offering panoramic views across Moray and the Moray Firth to Sutherland and Caithness. Brown Muir appears less prominent in views from the south and south-east where its more gentle slopes merge gradually with the surrounding landscape.
Knock of Braemorary	Distinctive conical hill prominent in views from the A940 on the approach to Moray and widely visible from the open low-lying Dava Moor and Lochindorb area. This hill forms a visual 'buffer' to less prominent upland areas and screens operational wind farms sited in the *Open Rolling Uplands* (10). Although this hill offers an excellent vantage point, it does not appear to be well-sued by walkers.
Carn Biorach	Carn Biorach lies close to the Knock of Braemoray. The boundary between Highland Council and Moray is aligned through this hill. This hill is prominent in views from the A940 and, like the Knock of Braemorary, it is important in partially screening operational wind farms located in the *Open Rolling Uplands* (11) from the wider Dava Moor area.
Binn Hill and Tappoch	These small hills rise out of the low-lying Moray coastal plain and are visible across a wide area including from parts of the coast.
Quarry Wood	A small but prominent hill rising to just 127m but important in providing an immediate landscape setting to Elgin. The Community Woodland on this hill provides a valuable recreational resource close to housing.
Hunt Hill	Hunt Hill lies in a similar location to Carn na Cailliche on the southern edge of the *Upland Moorland and Forestry* (10). It is subtly rounded with the summit (lying at 365m) forming a twin peak with Cairn Cattoch which is of a similar height. The gentle southern and western slopes of Hunt Hill are densely forested. While this hill does not form a distinctive landmark feature in wider views across Moray, it is seen from Speyside and from the A95 south-west of Aberlour where it backdrops more settled valley landscapes and visually contains the lower basin lying at the core of the *Upland Moorland and Forest* (10) and operational wind farm development.

Potential adverse effects on the setting and character of Landmark Hills

	*Wind turbines sited on top of the Landmark Hill would appear very prominent and would significantly affect the character of the hill.*
	*Large wind turbines sited close to the Landmark Hill would detract from its focus and diminish its scale and prominence*
	*Large wind turbines set away from the Landmark Hill but in the foreground of a key view to the hill, detracting from its focus and diminishing its apparent size. These effects are particularly significant where the hill is not high but rises dramatically from low-lying ground*

REPORT TO: **PLANNING AND REGULATORY SERVICES COMMITTEE ON 14 MARCH 2023**

SUBJECT: **CREATION AND OPERATION OF A MORAY TRUSTED TRADER SCHEME**

BY: **DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND FINANCE)**

1. REASON FOR REPORT

1.1 The Committee is asked to approve the creation and operation of a Moray Council branded Trusted Trader Scheme to allow Moray residents to search for Trading Standards vetted traders. The scheme is accessible via any internet device or over the phone.

1.2 This report is submitted to Committee in terms of Section III (E) (11) of the Council's Scheme of Administration relating to Trading Standards.

2. RECOMMENDATION

2.1 It is recommended that the Committee:

(i) approves the creation and operation of a Moray Trusted Trader Scheme;

(ii) approves the payment of a one off fee of £2,000 plus VAT set up fee to Trusted Directory Services Ltd (TDS), who will initially create and administer a Moray Trusted Trader Scheme;

(iii) approves that the £2,000 fee is sourced from one off income streams made in to the 2022/23 Trading Standards budget as per Finance Section at 4c; and

(iv) approves that the scheme is subsequently funded by members' annual subscription fees of £200, £70 of which would be returned to the Moray Council.

3. BACKGROUND

3.1 Approved Trader Schemes are an invaluable means for local consumers to access an up to date list of traders in their area operating with good consumer protection standards and therefore provide a means of making an informed choice of who they trade with. Such a scheme would also benefit reputable traders in seeking to compete fairly against those who would cut corners or trade illegally. The scheme focusses generally on the home repairs sector, where there can be significant issues with rogue traders targeting vulnerable consumers.

3.2 Since January 2020, Moray Council Trading Standards has dealt with 100 complaints relating to services including building work, gardening/landscaping, insulation work, roofing, double glazing, heating installation, painting/decorating, driveway work and fitted kitchens and bathrooms. The total value of the work was estimated at over £550,000.

3.3 From these complaints, six criminal investigations were instigated with allegations of various Trading Standards offences. Four reports were subsequently submitted to the Procurator Fiscal in respect of these investigations. Three of these were against local traders based in Moray. Draft charges included fraud, unfair commercial practices which contravene the requirement of professional diligence, misleading actions, misleading omissions and aggressive practices.

3.4 Dealing with these complaints and conducting these investigations requires a significant amount of time and resources from the Trading Standards Team, which has seen a reduction in numbers over the past few years. The introduction of a Trusted Trader Scheme, to which consumers can be signposted may reduce the number of complaints and pressures on the Team.

3.5 More than half of Scotland's local authorities operate approved trader schemes through their Trading Standards Service including "off the shelf schemes" such as Trusted Trader and Buy with Confidence.

3.6 The initial £2000 fee will be paid from the current Trading Standards budget as described at point 2.3.

3.7 A copy of the proposal by Trusted Directory Services is contained within **Appendix 1** which provides more detail of the scheme.

4. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP)

The Corporate Plan prioritises the promotion of economic development and growth in Moray to ensure a thriving and vibrant economy for it's citizens. Businesses flourish on a level playing field and the main function of Trading Standards is to ensure that businesses trade fairly. Similarly, LOIP prioritises growing a diverse and sustainable economy so

that Moray can be recognised as an outward facing community with a thriving and well connected commercial base. The introduction of a Moray Trusted Trader Scheme has the potential to promote local business and reward good service with a marketing opportunity.

(b) Policy and Legal

None.

(c) Financial implications

There is a one-off set up fee of £2,000 plus VAT to Trusted Directory Services Ltd to create the scheme, which would come from the Trading Standards budget.

In 2022/23, Moray Trading Standards received several sources of income, which were not accounted for within the normal budget and it is proposed that this income is used to pay the initial £2,000 fee. The income included a payment of £1,610 from HMRC, which was received as a result of a joint working initiative with Local Authority Trading Standards. Funding was made available to Trading Standards from HMRC for enforcement work relating to illicit tobacco and specifically when illicit tobacco was seized or obtained by Trading Standards. Recent enforcement work by Moray Council Trading Standards generated this payment. This work did not involve any additional resources or staff time and was carried out in the normal course of Trading Standards duties.

A further payment of £800 was received by Moray Trading Standards from the Scottish Government for work relating to fireworks legislation enforcement. This included the inspection of premises that stored and sold fireworks. This work also did not involve any additional resources or staff time and was carried out in the normal course of Trading Standards duties.

To recoup the initial fee in the first year, Moray would require 27 traders to join. If this is not achieved, efforts will be made to generate new members and grow the scheme. Thereafter, ongoing costs are funded by members' annual subscription fees of around £200. TDS would receive £130 per annual subscription per trader, the remaining £70 would be returned to the Council. The re-subscription rate for other schemes is currently 96%.

East Renfrewshire has a similar population size as Moray of 95,000 and currently has 28 members. East Lothian has a population of 106,000 and has 82 members. This is higher than average because their scheme has been around for a very long time and has very gradually grown to that number.

There are also potential staff time saving benefits to implementing the scheme. In 2022, Trading Standards staff spent approximately 150 hours in dealing with complaints regarding poor quality services and rogue traders. This included a substantial investigation into poor trading practices by a Moray based trader, which resulted in the submission of a

report to the Procurator Fiscal. Staff time may be substantially reduced by Consumers opting for work to be carried out by Trading Standards vetted traders.

(d) Risk Implications
That there is no uptake of the scheme. However Trusted Trader schemes operate successfully in other areas. Currently, 11 other Scottish Authorities have Trusted Trader Schemes implemented by TDS with two other memberships pending.

(e) Staffing Implications
Staff will be involved in the initial vetting process only. This is estimated to take around four hours per applicant. The scheme will be accommodated within existing resources. Once the initial vetting process has been carried out, 70% of the workload, all the support functions, and dispute resolution are handled by TDS.

(f) Property
None.

(g) Equalities/Socio Economic Impact
An Equality Impact Assessment is not needed because the recommended actions don't affect people

(h) Climate Change and Biodiversity Impacts
None

(i) Consultations
Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth & Development, the Legal Services Manager, Lissa Rowan (Committee Services Officer), the Equal Opportunities Officer have been consulted and comments received have been incorporated into the report.

5. CONCLUSION

5.1 That the Committee considers the recommendations set out in Section 2 of the report in regard to the creation and operation of a Moray Trusted Trader Scheme.

5.2 That the introduction of a Trusted Trader Scheme protects consumers and supports reputable business,

Author of Report: Muriel Allan, Principal Trading Standards Officer
Appendix 1: Moray Trusted Trader Proposal by Trusted Directory Services Ltd

Moray Trusted Trader Platform

Prepared by Steve Richardson
Managing Director, Trusted Directory Services (TDS)

Background

We have 15 years experience dealing with bespoke commercial and local authority directory solutions across the UK and USA. We continue to work alongside Yext, the leading USA data aggregator and Yell.com in the UK, along with European data partners such as Uberall (1&1 Internet).

We worked with CTSI to setup and provide the Consumer Code Directory from 2012 – 2017 and now work with 11 different Councils across Scotland to deliver and manage a Trusted Trader platform.

Our Vision

- To provide a simplified and first class consumer experience, allowing all residents to search for Trading Standards vetted trusted traders accessible via any internet device or over the phone.
- To present a fully local Trading Standards branded scheme with no 3rd party advertising or commercial promotion. TDS works **behind** the scenes, working with you and **for you**.
- To offer a fully flexible off the shelf solution for any new or established trusted trader scheme. Including scheme migration to a brand new **fully** managed scheme with dispute resolution.
- To be able to provide access to a shared platform **without any costs** to a Council, allowing cost recovery via trader membership fees. Future promotion and marketing can also be funded from fees.

Our Solution – www.trustedtrader.scot

Public Website - trustedtrader.scot is a simple, obvious, local and trusted domain name. This website has been set up purely for the benefit of the official Trusted Trader schemes. All data, trader and reviews remain 100% the property of the respective Council and not any third party including us.

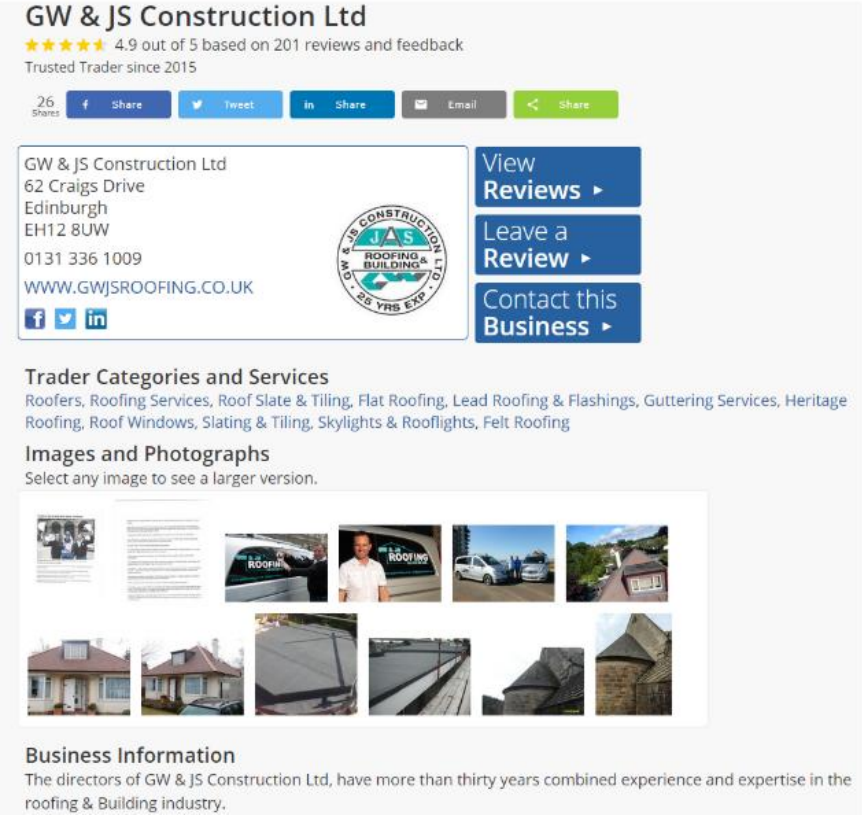
Any Council that utilises this platform will follow the convention set by Edinburgh eg:
https://www.trustedtrader.scot/Edinburgh/
https://www.trustedtrader.scot/EastLothian/
https://www.trustedtrader.scot/Fife/
https://www.trustedtrader.scot/Renfrewshire/
https://www.trustedtrader.scot/EastRenfrewshire/
https://www.trustedtrader.scot/Angus/
https://www.trustedtrader.scot/EastAyrshire/
https://www.trustedtrader.scot/WestDunbartonshire/
https://www.trustedtrader.scot/EastDunbartonshire/
https://www.trustedtrader.scot/<Council Name>/

The website has been designed around a high-speed database and user experience data taken from 15 years of building public directories. The website continually evolves based on direct feedback from the public, traders, council staff and usability data. The latest major update is currently underway.

The Moray Trusted Trader scheme would be branded in your preferred colours, normally matching those of the Council. We would also set up and create the familiar Trusted Trader handshake logo. The vetting process, Code of Practice and the Complaints Process are relatively standard across all schemes, with local variations if required, but all based around the lead authority, Dundee Council, who own all the Trusted Trader IP.

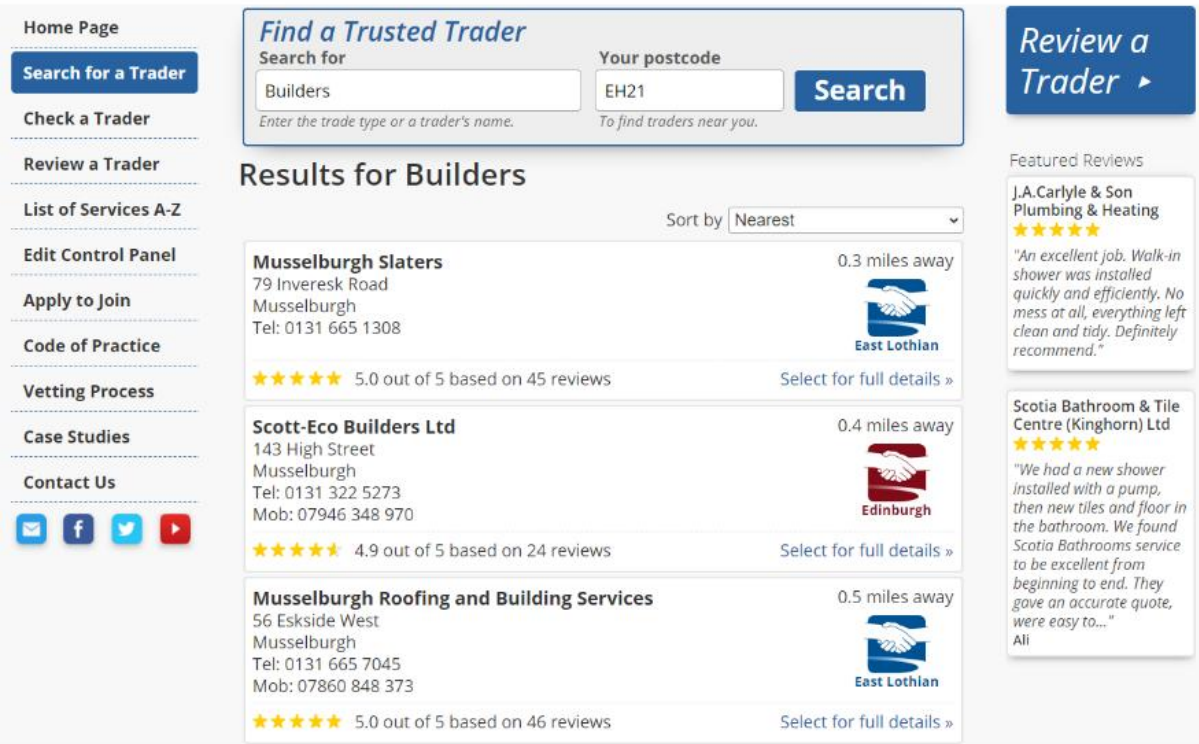
Your home page will look very similar to Edinburgh but branded in your colours and Council logo.

This is an example of a trader page, showing large and visual calls to action for consumers, ie view reviews, leave a review or contact the trader and make a work request.

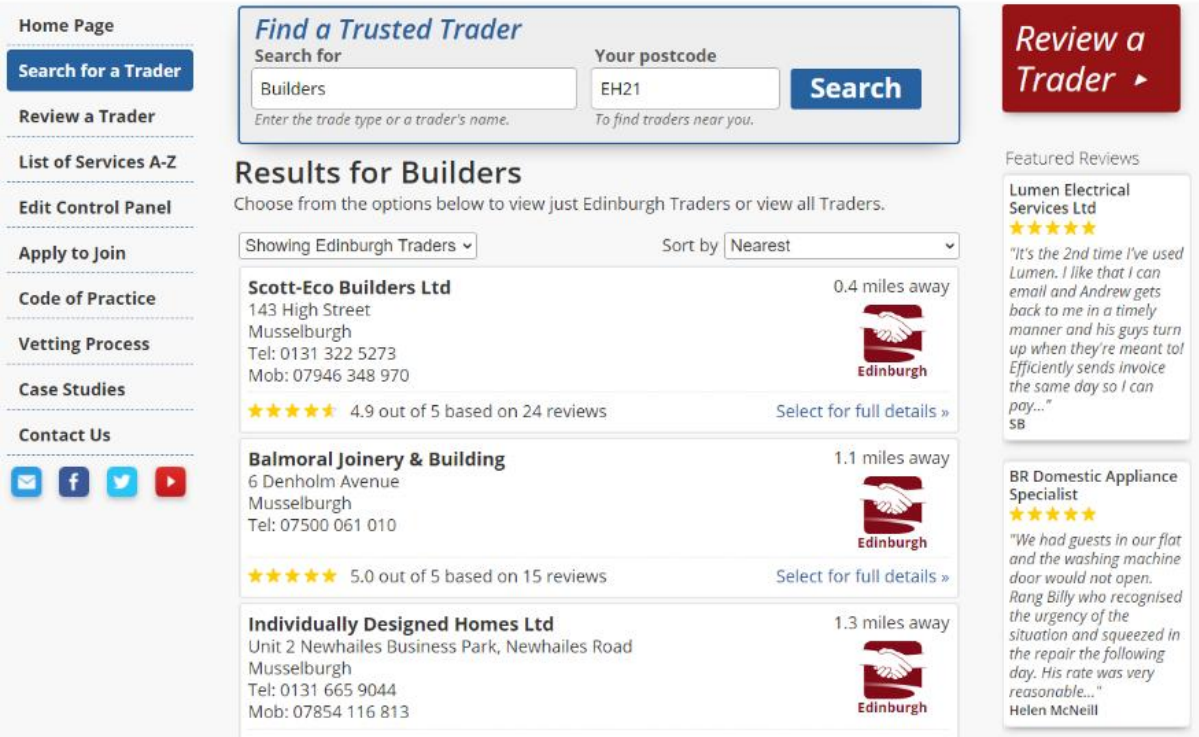


Trader Search – Although the platform has a central database, it is broken down into specific areas. Consumers or residents can search from the top level of the website, or they can choose to search from their local scheme.

This a search for builders in EH21 at the top level, www.trustedtrader.scot showing results from different schemes.

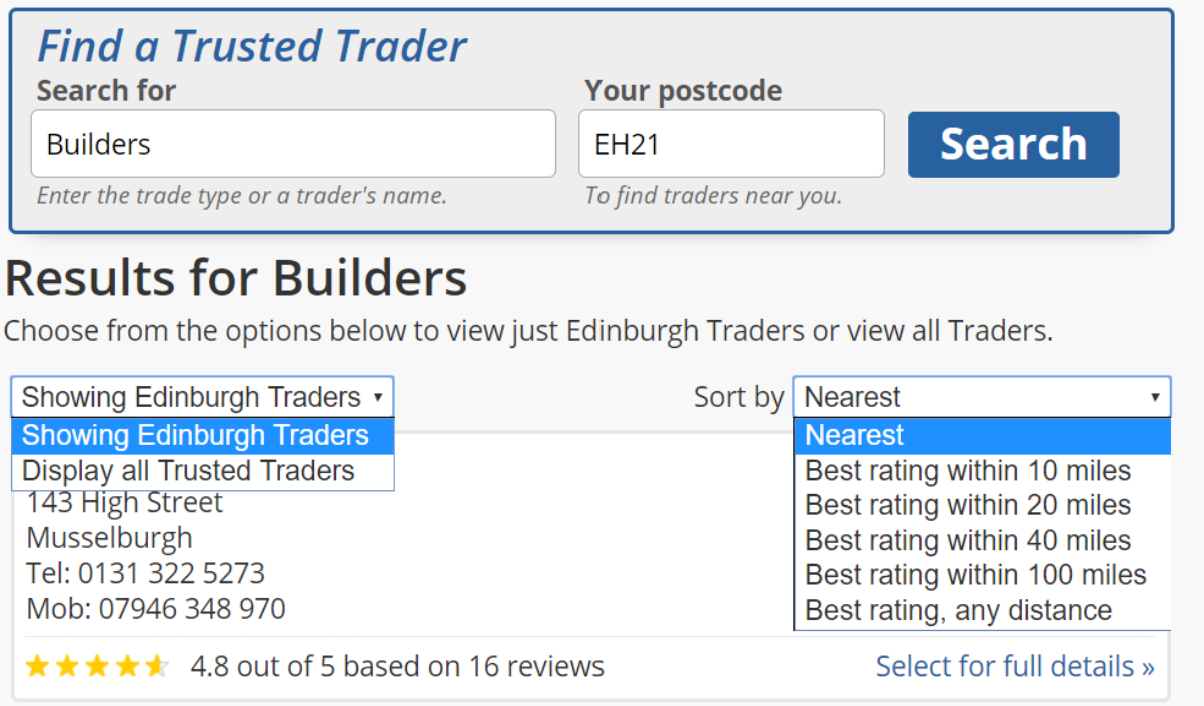


This is the same search done on Edinburgh Trusted Trader. www.trustedtrader.scot/Edinburgh



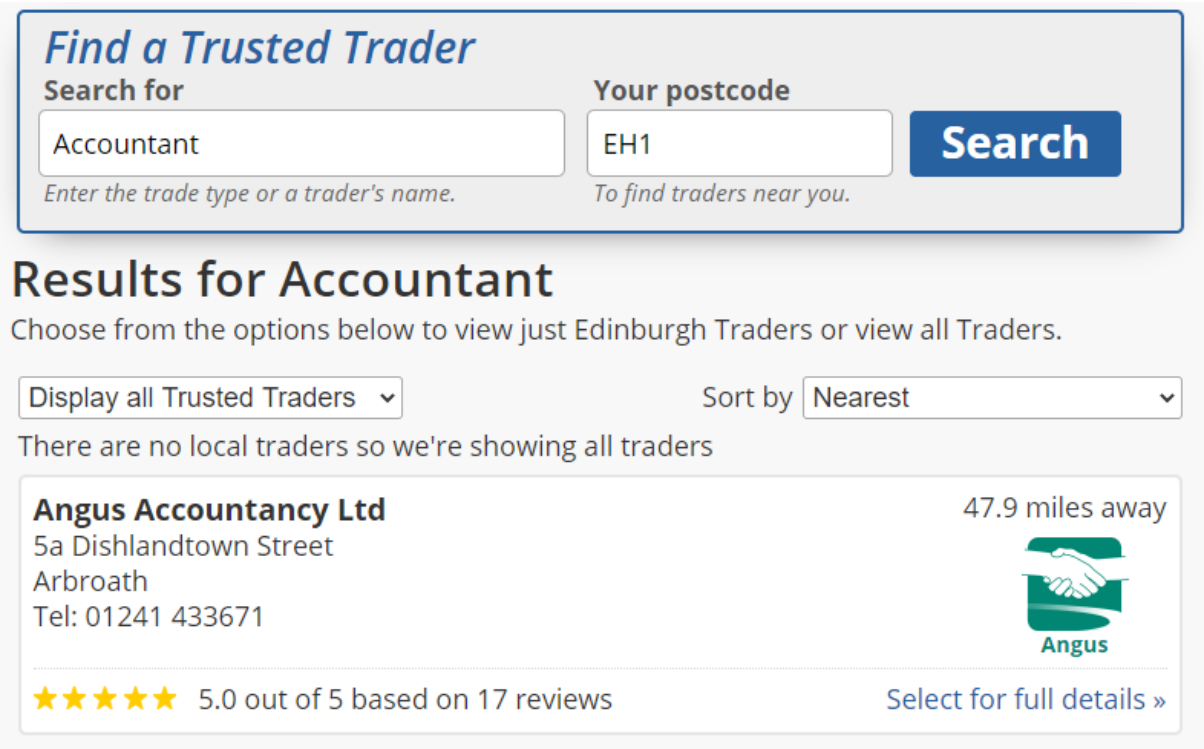
By default, local scheme searches default to showing local scheme members. But residents have a drop down box that allows them to show all members from neighbouring schemes who have stated they service work requests in this area.

Residents can also choose to reorder results by best rating within a certain radius.

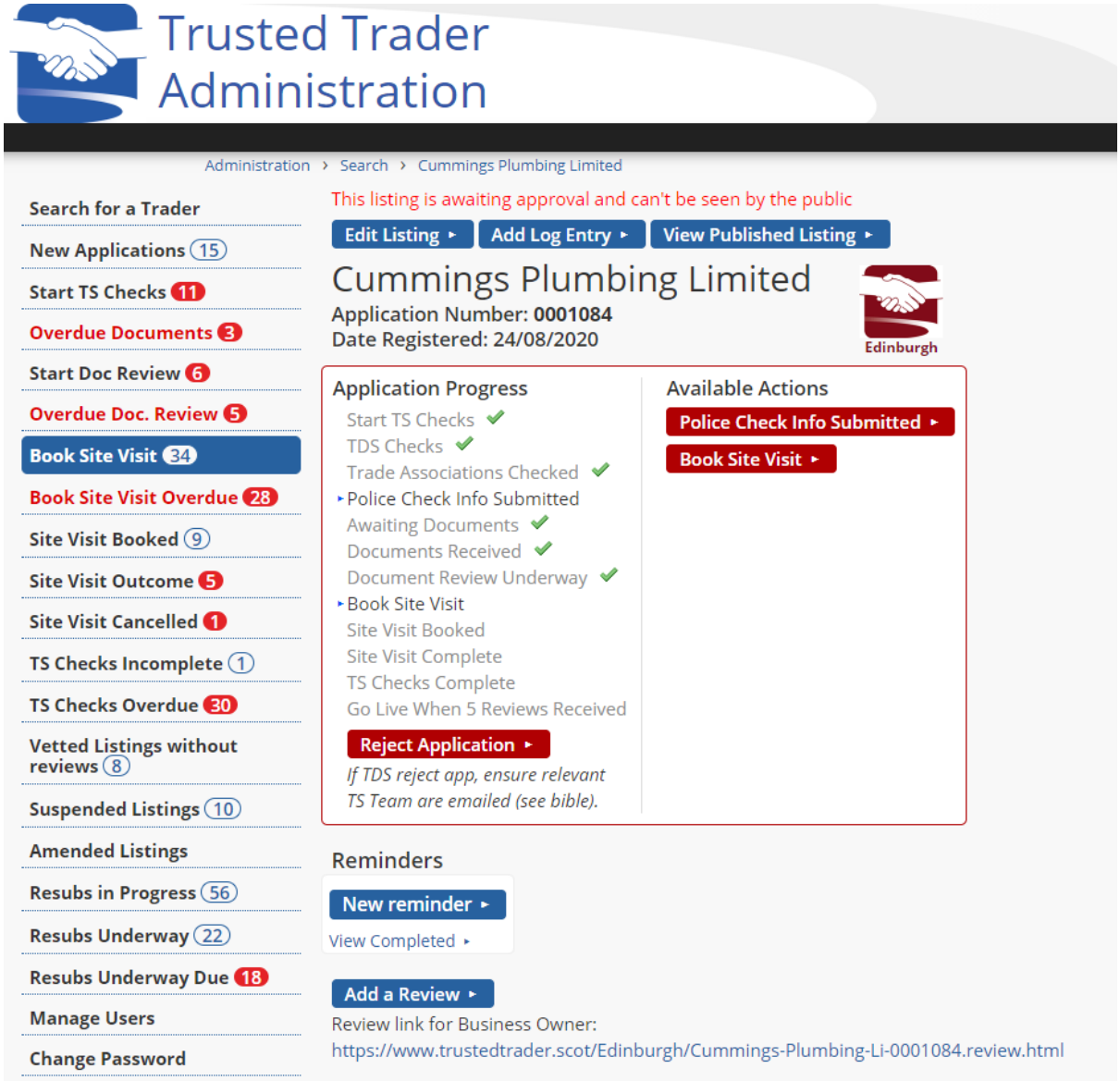


When a scheme doesn't have any members in a particular category, our system will display results from neighbouring schemes.

Eg in this example, the only Trusted Trader Accountant we have is in Arbroath, Angus. But the result shows up straight away in Edinburgh as although there are no relevant Edinburgh Trusted Traders, there is an Angus Trusted Trader. This is useful for smaller or new schemes starting out and still allows them to show relevant information.



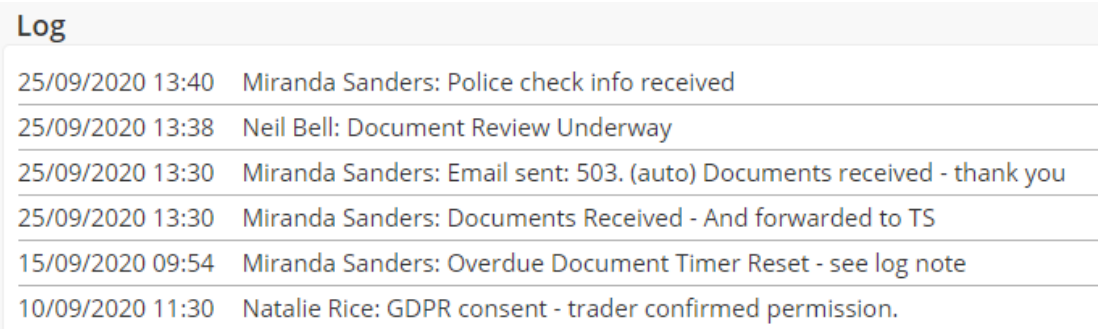
Administration Website - trustedtrader.scot comes with a secure back administration area that allows trader application progress to be tracked, monitored along with all the usual moderation and statistical information. This allows the straightforward online sign up of trader applicants including declaration. Below is a screenshot of the TDS admin area to give a flavour of how it works.



Each Scheme gets it own dedicated admin area for TS staff, which is a cut down version, just giving the options relevant for TS and that particular scheme.

This means training is minimal but allows the vetting process to proceed in a methodical way, with TDS staff having visibility of progress, allowing us to provide customer support. TS also have instant access to statistical information and can download trader details for auditing purposes.

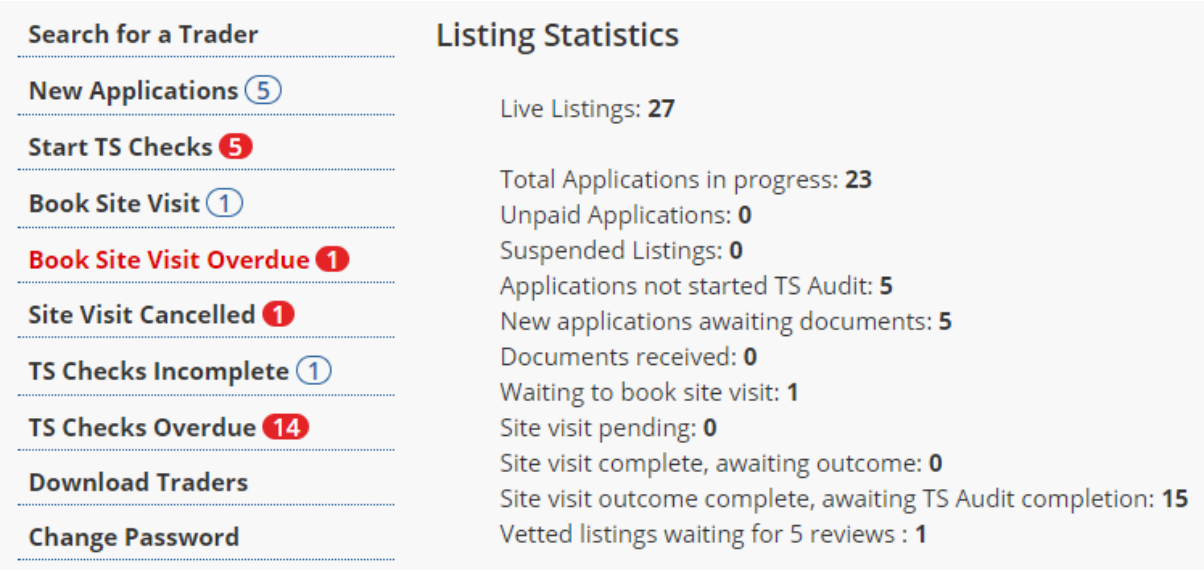
Any interaction on a traders page is captured automatically on a visual audit eg, which time and date stamps each entry, along with the admins name, see screen shot below:



Log

25/09/2020 13:40	Miranda Sanders: Police check info received
25/09/2020 13:38	Neil Bell: Document Review Underway
25/09/2020 13:30	Miranda Sanders: Email sent: 503. (auto) Documents received - thank you
25/09/2020 13:30	Miranda Sanders: Documents Received - And forwarded to TS
15/09/2020 09:54	Miranda Sanders: Overdue Document Timer Reset - see log note
10/09/2020 11:30	Natalie Rice: GDPR consent - trader confirmed permission.

Below is an example of a Trading Standards Admin panel. Blue numbers are informational, Red numbers require an action.



Services that TDS Provide

- Setup and create an initial Trusted Trader scheme or migrate an existing one.
- Manage marketing to recruit ongoing traders.
- Responsibility of hosting and publishing content. We have media publisher insurance.
- Back administration access and visibility, tailored to suit your local processes.
- Ownership of the trader application and admin process. From initial application and taking payment, to providing support throughout the application process. This allows TS resource to concentrate on vetting and report back if applicant is a pass, fail or needs remedial action.
- Creating and sending Trader certificates, vehicle stickers and promotional material.
- Review moderation, generation including offline freepost review service.
- Dispute management and consumer complaints. Majority of disputes can be dealt with by TDS mediating in the name of Trusted Trader.
- Ongoing customer services for traders and consumer enquiries.
- Regular trader communications and passing on any required TS or comms team messaging.
- Regular management reports breaking down data and analytics.
- Ongoing platform development to keep content and design modern and relevant.
- Search engine optimisation to drive local consumer enquires.
- Social Media management of the Trusted Trader brand conforming to local style guides.
- Scottish based call centre to assist vulnerable users and those without internet access.

Costs – Funding Trusted Trader

Previously we have been able to absorb set up costs for new schemes, but unfortunately due to the complexity of the platform and amount of work we need to do set up a scheme, we now have to charge a one off £2000 + VAT set up fee. This is payable once the scheme has been accepted into service

After that, schemes costs are funded by members annual subscription fees. The actual cost is dependent on what the membership price would be as different schemes have a different pricing structure. But most schemes are around the £200 + VAT point, give or take £10.

To give an idea of the breakdown based on a typical trader fee of £200 + VAT

- To provide a fully managed service including offline the consumer helpline, TDS would receive £130 per annual subscription per trader.

- The remaining £70 would be returned to the Council. This then could be partially or completely reinvested back into a marketing budget to help grow and promote the scheme.

Marketing

As part of the £130 fee per trader, TDS will provide digital marketing services in the form of organic search engine optimisation, to ensure the scheme is searchable and generates traffic via Google. TDS will also promote via Trusted Trader Social Media channels, including Twitter, Facebook and LinkedIn. Vehicle stickers will also be provided to members which are long proven to be the most cost-effective form of Trusted Trader promotion.

Other marketing - TDS is experienced in most forms of marketing, having managed PPC campaigns, Radio Campaigns, bus promotions, press, magazines as well as creating artwork and printing for flyers, roller banners and posters. TDS is happy to work with the Council on suggesting ideas for any available marketing budget and can come up with a marketing plan and costed activities.

Reviews / Feedback

All reviews are professionally and humanely moderated. No review is automatically allowed to go live. A subsequent 25% of published reviews are randomly picked for secondary verification, where review comments are conformed by contacting the reviewer. This ensures the review system is robust and of the highest quality, eradicating any gaming or fake reviews.

Negative reviews are thoroughly investigated as any negativity could indicate a potential trader problem. Depending on the issue, a consumer may be invited down the complaints process to resolve the problem, then submit a fresh review based on their complete experience. Or if the review is genuine and the consumer simply wants it published, then it will be displayed. Traders have the right to reply, so can leave a single official statement at the end of the review, giving their side of the story if they want to.

Reviews can be left digitally on a traders page, or from hardcopy review forms and a freepost service, which is provided by TDS as part of the traders £130 fee.

Call Centre

TDS handle all customer service calls for the scheme, but also operate a Trusted Trader help line based in Edinburgh, which is aimed at the more vulnerable or those without internet access. The number for this is 0333 555 7016. This is also included in the £130 fee per member.

SLA's

The website hosting runs at 99.9% availability and all consumer and trader requests are dealt with within a maximum of one business day. The office is manned Mon – Fri, 09.00 – 17.00. Our consumer trader helpline is manned 7 days a week from 08.00 – 23.00, only shutting on Christmas Day.

Case Studies

Schemes we have started from scratch are:
Edinburgh Trusted Trader - https://www.trustedtrader.scot/Edinburgh/
East Renfrewshire Trusted Trader - https://www.trustedtrader.scot/EastRenfrewshire/
Angus Trusted Trader (replaced ARTS) - https://www.trustedtrader.scot/Angus/
East Dunbartonshire Trusted Trader - https://www.trustedtrader.scot/EastDunbartonshire/ (going live)
SCOTSS Approved Trader - https://www.trustedtrader.scot/SCOTSS/
Aberdeen Trusted Trader – currently in build

Schemes we have migrated:
East Lothian Trusted Trader (from Council website) - www.trustedtrader.scot/EastLothian/
Renfrewshire Trusted Trader (from Council website) - www.trustedtrader.scot/Renfrewshire/
Fife Trusted Trader (from ReferenceLine) - www.trustedtrader.scot/Fife/
East Ayrshire Trusted Trader (from ReferenceLine) - www.trustedtrader.scot/EastAyrshire/
West Dunbarton Trusted Trader (from ReferenceLine) www.trustedtrader.scot/WestDunbartonshire/

If you need any contact details from any of your colleagues who work on these schemes and who can tell you how things went, just let me know.

During Covid, although membership uptake of new members has obviously been down, we have still managed a 94% membership retention rate across all schemes. I think this is testament to the customer service ethos of our team.

Approved Trader (SCOTSS)

We also created and manage https://approvedtrader.scot/ on behalf of SCOTSS. Approved Trader is a standard searchable website that includes results from all the Scottish Local Authority Schemes. Although Trusted Trader is the most common, there are also a few Buy With Confidence Schemes and the Perth and Kinross BPP. Approved Trader simply signposts consumers back to their local scheme but allows more consumer choice where there is scheme overlap.

As a Trusted Trader scheme, all live members will be automatically displayed on Approved Trader.

Summary

Our purpose is to provide and present a professional Trusted Trader branded platform to the consumer. Our remit is to assist and to make your life easier. As Trusted Trader resource, we become a buffer between Trading Standards and easily answered or resolved resident or trader issues.

All data, reviews and information is the **property of the scheme** and not TDS. We work in partnership with yourselves and present ourselves under the Trusted Trader brand. The only reference to TDS is when legally required rather than publicly promoting our own interests.

Once an agreement has been reached and signed, we could have the scheme set up and running within four to six weeks.

There is a one off £2000 set up fee, then after that TDS will keep £130 of any trader fee as scheme management costs.

More Information

If you have any questions or would like to discuss further, then please get in touch.

Steve Richardson
Managing Director
Trusted Directory Services Ltd
Direct: 01789 614 037
Mobile: 07843 061 597
Email: steve@trustedtrader.scot