Moray Council
Biodiversity Study

January 2024

CONTROL SHEET

Client: Moray Council
Project Title: Moray Council
Report Title: Biodiversity Study
Document number: 13713
Project number: 378201

Issue Record

Issue	Status	Author	Reviewer	Approver	Issue Date
1	Draft for Comment	MM	GN	GN	12/10/2023
2	Draft for Comment V2	MM	GN	GN	01/12/2023
3	Final	MM	GN	GN	31/01/2024

EnviroCentre Limited Office Locations:

Glasgow **Edinburgh** **Inverness** **Banchory**

Registered Office: Craighall Business Park 8 Eagle Street Glasgow G4 9XA
Tel 0141 341 5040 info@envirocentre.co.uk www.envirocentre.co.uk

EnviroCentre Limited is registered in Scotland under no. SC161777.

VAT no. GB 348 6770 57.

EXECUTIVE SUMMARY

Envirocentre Limited were commissioned by Moray Council to undertake a Biodiversity Study to gather evidence which will go on to inform the Local Development Plan (LDP) 2027. The study is required to aid the integration and implementation of National Planning Framework 4 policies relating to biodiversity within the LDP.

The aim of this study is to provide baseline data which Moray Council can utilise to develop the LDP 2027 in line with the biodiversity policies set out in NPF4. The study is split into three topics:

1. Priority Species and Habitats
2. Site Reviews
3. Biodiversity Enhancements Through the Planning System

There are a variety of statutory designated sites within the Moray LDP area which comprise of internationally important European designated sites (SACs and SPAs), nationally important sites (SSSIs) and one locally important LNR. Sites which would currently meet the criteria of a 30x30 site (SSSI, SAC, SPA) cover c.6% of the total LDP area.

The NESBReC data request returned records for 390 species considered to be national or international important within the Moray LDP area. There were also 190 locally important species and 563 records of Invasive Non-Native Specise. There are two Important Invertebrate Areas, a Scottish Wildlife Trust Reserve and two Wildcat Priority Areas.

36 historically designated SINS sites were reviewed, with some subject to field surveys. Many of the SINS sites are associated with SSSIs. The sites which sit entirely within existing SSSIs do not add any value above the existing designation. The former SINS which are associated with SSSIs but extend outside of the site boundary could act as buffers to protect against edge effects. All of the sites surveyed had priority habitats and/or species associated with them, though many were in poor condition with opportunities for enhancement.

The above data was used to recommend strategic links which could be taken forward in the development of Nature Networks, which are a requirement of NPF4.

A review of existing Moray planning policy and guidance in relation to NFP4 found that there are key gaps relating to the implementation of Policy 3. Moray Council should set out clear requirements for enhancement at the different development hierarchies (National and Major vs Local). There is an opportunity to better link enhancements local priorities. Guidance setting out how developers should demonstrate their biodiversity enhancements is also required. Policies in relation to protection of soils needs to be strengthened. The trees and woodland policies are aligned for the most part, however wording setting out protection of individual trees of biodiversity value outside of woodlands is needed. Clearer guidance for developers on when planning applications should be accompanied by specialist (ecological) surveys would be beneficial.

The development of these policies and associated guidance, as well as the robust assessment of planning applications in line with NPF4 requires additional specialist input. The risks and benefits associated with three options for achieving this (upskilling of existing staff, recruitment of internal specialist or out-sourcing) are discussed.

Contents

Appendices

Figures

Tables

1 INTRODUCTION

1.1 Terms of Reference

Envirocentre Limited were commissioned by Moray Council to undertake a Biodiversity Study to gather evidence which will go on to inform the Local Development Plan (LDP) 2027. The study is required to aid the integration and implementation of National Planning Framework (NPF) 4 policies relating to biodiversity within the LDP.

The specific project requirements were set out within the invitation to tender produced by Moray Council. The study area covers the Moray Council LDP area only. Part of the Council area lies within the Cairngorm National Park (CNP), as the CNP Authority LDP covers this area, it has not been considered further within this study.

1.2 Scope of Report

The aim of this study is to provide baseline data which Moray Council can utilise to develop the LDP 2027 in line with the biodiversity policies set out in NPF4. The study is split into three topics with the following objectives:

1. Priority Species and Habitats
    - Conduct a desk study to identify priority species and habitats within the LDP area.
2. Site Reviews
    - Review data available relating to historically locally designated Sites of Interest to Natural Science (SINS).
    - Conduct site visits to a portion of the SINS to survey present status in terms of habitats present and suitability for protected and/or notable species.
    - Provide recommendations relating to the importance of each site for safeguarding through planning and opportunities to restore any degraded habitats.
    - Map all local, national and international designated sites as well as other areas important for biodiversity and identify strategic links requiring further investigation for inclusion in future nature network.
3. Biodiversity Enhancements Through the Planning System
    - Review existing policy and guidance relevant to Moray and conduct a gap analysis to identify additional guidance or policies needed to ensure NPF4 compliance and protection of species and habitats of specific importance to Moray.
    - Provide examples of current ‘best practice’ regarding biodiversity enhancement through the planning system from other Scottish Local Authorities.
    - Present recommendations relating to resources required for staff to adequately assess planning applications using a biodiversity metric tool to quantify enhancements.

1.3 Report Usage

The information and recommendations contained within this report have been prepared in the specific context stated above and should not be utilised in any other context without prior written permission from EnviroCentre Limited.

If this report is to be submitted for regulatory approval more than 12 months following the report date, it is recommended that it is referred to EnviroCentre Limited for review to ensure that any relevant

changes in data, best practice, guidance or legislation in the intervening period are integrated into an updated version of the report.

Whilst the Client has a right to use the information as appropriate, EnviroCentre Limited retains ownership of the copyright and intellectual content of this report. Any distribution of this report should be managed to avoid compromising the validity of the information or legal responsibilities held by both the Client and EnviroCentre Limited (including those of third party copyright). EnviroCentre Limited does not accept liability to any third party for the contents of this report unless written agreement is secured in advance, stating the intended use of the information.

EnviroCentre Limited accepts no liability for use of the report for purposes other than those for which it was originally provided, or where EnviroCentre Limited has confirmed it is appropriate for the new context.

2 PRIORITY SPECIES AND HABITATS

2.1 Background

Scotland is facing twin crisis of biodiversity loss and climate change which feedback negatively with one another. Declining biodiversity reduces resilience to climate change and exacerbate the effects, whilst a changing climate will increase the rate of biodiversity loss.

According to the 2023 State of Nature Scotland Report[1] there has been an average 15% decline in abundance of indicator species since 1994 and 11% of species assessed against IUCN Red List Criteria[2] are considered to be threatened with extinction. Threats identified include climate change, agricultural intensification, upland management, land-use change, habitat loss, fragmentation and degradation, changes in grazing/browsing levels, pollution, INNS and for some species groups, persecution. Inappropriate development is also identified as an exacerbating factor.

In order to tackle these crises, the Scottish Government has recently set out its draft Biodiversity Strategy to 2024[3] with a vision of a nature positive Scotland by 2030 and for biodiversity to be restored and regenerated by 2045. This document builds on the Biodiversity 2020 Challenge[4].

The Scottish Government has also committed to protect 30% of the land (and coastal and freshwaters) by 2030 (30x30), in line with the Global Biodiversity Framework[5]. At present, across Scotland 18.2% of land and freshwater are protected.

NPF4 forms part of the response and solution to these crises through embedding the protection of existing features of biodiversity value and securing positive effects for biodiversity through development planning.

Policy 4, Natural Places is designed to protect, restore and enhance natural assets making the best use of nature-based solutions. It sets out the expectation that LDPs will identify and protect locally, regionally, nationally and internationally important assets on land and along coasts. These should be safeguarded within the spatial strategy, which should also aim to better connect these protected areas to allow natural processes to take place (see section 4 for further details).

NPF4 requires habitats outside of Protected Areas to be protected, conserved, restored and enhanced as part of Policy 3. There is a particular focus on restoring habitats and creating new ones to increase ecological connectivity. Specific habitats such as peatlands and woodlands are given further protection under Policy 5 and 6.

Important habitats for conservation and enhancement can be identified as internationally important if listed as priority habitats in Annex I of the EU Habitats Directive, nationally important if they are Scottish Biodiversity List priority habitats. Locally important habitats are described within the NESBiP habitat statements. The habitats on these lists have been recognised as in need of conservation action due to their rarity (at the relevant geographic scales) and/or because they have undergone a

[1] Available at: https://stateofnature.org.uk/wp-content/uploads/2023/09/TP26056-SoN-Scotland-summary-report-v5-1.pdf (Accessed 22/11/2023)

[2] Available at: https://portals.iucn.org/library/node/10315 (Accessed 22/11/2023)

[3] Scottish Government (2022) Biodiversity Strategy to 2045. Tackling the nature emergency. Available at: https://www.gov.scot/publications/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland/documents/ (Accessed 20/11/2023)

[4] Available at: https://www.gov.scot/publications/2020-challenge-scotlands-biodiversity-strategy-conservation-enhancement-biodiversity-scotland/ (accessed 20/11/2023)

[5] Further details available here: https://www.cbd.int/gbf/ (accessed 20/11/2023)

significant decline in coverage. Some of the NESBiP habitats are common and widespread (eg scrub) but have been listed as they provide important habitat for protected and notable species.

Availability of detailed mapping of habitats is patchy with some habitat types (eg woodlands) better represented than others (eg grassland). Whilst this desk study identifies some habitats of importance within the Moray LDP area, many will have been missed. Appropriate levels of information supporting development proposals will therefore be key to ensuring semi-natural habitats are appropriately protected and opportunities for restoration, enhancement and building connectivity are recognised.

Species of flora and fauna are given protection under NPF4 Policies 3 and 4 which place a duty on Planning Authorities to protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy as well as protect locally, regionally, nationally and internationally important natural assets within the LDP.

Within this context it is considered that species of international importance include European Protected Species (EPS) protected under the Conservation (Natural Habitats, &c.) Regulations 1994, nationally important species include those protected under the Wildlife and Countryside Act 1981 (as amended), as well as SBL species and that species present within the NESBiP locally important species list are of regional/local importance. Where species are not covered under the above legislation or policy, their level of importance can be assessed using relevant evaluations of conservation status which use appropriate systems such as IUCN red list criteria[6] eg. the Birds of Conservation Concern (BOCC)[7]. For many species or species groups there is insufficient data on their current and historical distribution and population dynamics to be able to evaluate them.

Policy 4 also states that where development proposals that are likely to have an adverse effect on species protected by legislation they will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or it may be affected by a proposed development, steps must be taken to establish its presence and potential impacts must be fully considered prior to the determination of any application. Data provided within this desk study can aid the Planning Authority in evidencing where protected species may be present and further survey, impact assessment and protections plans may be required. However, absence of records does not rule out presence of such species.

2.2 Methods

In order to identify areas of importance for protected or notable species and habitats within the Moray Council area the following data sources were used:

- North East Biological Records Centre (NESBReC) for records of the following within the Moray Council Area[8]:
    - Designated Species
    - North East Biodiversity Partnership (NESBiP) Locally Important Species
    - Additional Cairngorms Nature Priority Species
    - Invasive Non-native Plant Species
- Buglife's Important Areas for Invertebrate[9]
- NatureScot Open Data[10] for protected sites:

[6] Available at: https://www.iucnredlist.org/resources/categories-and-criteria (accessed 31/01/2024)

[7] Available at: https://www.bto.org/our-science/publications/birds-conservation-concern (accessed 31/01/2024)

[8] Data provided on the 30th May 2023. Data older than 20 years was excluded from the search as it was considered unlikely to be relevant.

[9] GIS data provided via email on the 28th May 2023.

[10] Data available at: https://opendata.nature.scot/search?groupIds=9828d34c7aee46919f28ccc859e76108 (Accessed 22nd May 2023)

    - Sites of Special Scientific Interest (SSSIs)
    - Special Protection Areas (SPAs)
    - Special Areas of Conservation (SACs)
    - Local Nature Reserves (LNRs)
    - Marine Protected Areas (MPAs)
- NatureScot Open Data[11] for Habitats and Species:
    - Habitat Map of Scotland
    - Carbon and Peatland Map Scotland 2016
    - Wildcat Priority Areas
- Scottish Forestry Open Data[12] for Native Woodland Survey of Scotland (NWSS)
- Scottish Government Spatial data for Land Capability for Agriculture[13]
- Royal Society for the Protection of Birds (RSPB) Wetland Inventory[14]
- Scottish Wildlife Trust (SWT) Reserve Boundaries[15]
- Joint Nature Conservancy Council (JNCC) for internationally important Annex I habitat descriptions[16]
- Scottish Biodiversity List for nationally important priority species and habitats[17]
- NESBiP website for lists of locally important habitats[18] and species[19].

A full list of groups/organisations contacted as part of the desk study and responses received can be found in Appendix A.

2.3 Constraints

Desk studies are limited by the reliability of third-party information and the geographical availability of biological and/or ecological records and data. This emphasises the need to collate up-to-date, site-specific data based on field surveys by experienced surveyors. The absence of a species from biological records cannot be taken to represent actual absence. Species distribution patterns should be interpreted with caution as they may reflect survey/reporting effort rather than actual distribution.

2.4 Results

The results of the above desk study are presented in the various plans within Appendix B. A summary of the results is also provided below.

---

[11] Data available at: https://opendata.nature.scot/search?groupIds=b496e58a266c4df49fe1c8f5f988db83 (Accessed 22nd May 2023)

[12] Data available at: https://open-data-scottishforestry.hub.arcgis.com/datasets/6d27b064fcba471da50c8772ad0162d7_0/about (Accessed 22nd May 2023)

[13] Data available at: https://spatialdata.gov.scot/geonetwork/srv/eng/catalog.search#/metadata/24c6df5a-6b04-43f8-839f-0d45cc2802e3 (Accessed 02/10/2023)

[14] GIS data relevant to Moray shared via email on the 25th July 2023. Biggins, A. and Francis, I. (2007) North East Scotland Wetland Inventory. RSPB Scotland.

[15] Data available at: https://scottishwildlifetrust.org.uk/our-work/our-evidence-base/our-data/ (Accessed 29/09/2023)

[16] Available at: https://sac.jncc.gov.uk/habitat/ (Accessed 20/11/2023)

[17] Available at: https://www.nature.scot/scotlands-biodiversity/scottish-biodiversity-strategy-and-cop15/scottish-biodiversity-list (Accessed 20/11/2023). It should be noted that a review of Scotland's priority habitats and species is currently underway at the time of writing.

[18] Available at: https://www.nesbiodiversity.org.uk/biodiversity-information-for-developers/important-habitats-for-biodiversity-in-the-north-east-of-scotland/ (31/01/2024)

[19] Available at: https://www.nesbiodiversity.org.uk/biodiversity-information-for-developers/important-local-species/ (Accessed 31/01/2024)

2.4.1 Protected Sites

There are a variety of statutory designated sites within the Moray LDP area which comprise of internationally important European designated sites (SACs and SPAs), nationally important sites (SSSIs) and one locally important LNR. The locations of these can be found in Plan Number GIS022, Appendix B. Sites which would currently meet the criteria of a 30x30 site (SSSI, SAC, SPA) cover 11,568 ha of land or c.6% of the total LDP area. Of these protected sites, 90.8ha are designated for geological features only with no conservation objectives relating to biodiversity.

Any development proposals which are likely to affect a designated site cannot be supported through planning unless it can be shown that there will not be adverse impacts to the conservation objectives of the site. A summary of the designated sites and the features they are designated for can be found in Table 2-1 below. It should be noted there are overlaps in the designations, with most of the SPAs and SACs also being designated as SSSIs but the two designations may be for differing features. Where a feature is SAC/SPA designation it is highlighted in bold.

Table 2-1: Statutory designated sites within the LDP Area.

Designated Site Name	Designated Features
Bochel Wood SSSI	Biological: • Upland birch woodland
Boghole, Muckle Burn SSSI	Geological: • Silurian - Devonian Chordata
Buinach and Glenlatterach SSSI	Biological: • Lowland dry heath • Upland birch woodland • Upland oak woodland
Burn of Ballintomb SSSI	Biological: • Wet woodland
Clashach – Covesea SSSI	Geological: • Permian - Triassic (red beds) • Permian - Triassic Reptilia
Coleburn Pasture SSSI	Biological: • Lowland acid grassland
Culbin Bar SAC	Biological: • Atlantic salt meadows • Coastal shingle vegetation outside the reach of waves • Shifting dunes
Culbin Sands, Culbin Forest and Findhorn Bay SSSI	Geological: • Coastal Geomorphology of Scotland Biological: • Fungi assemblage • Hydromorphological mire range • Invertebrate assemblage • Lichen assemblage • Mesotrophic loch • Saltmarsh • Sand dunes • Shingle • Vascular plant assemblage

Cullen to Stake Ness Coast SSSI	Geological: • Dalradian • Quaternary of Scotland Biological: • Lowland dry heath • Saltmarsh • Shingle • Springs (including flushes)
Cutties Hillock SSSI	Geological: • Permian - Triassic Reptilia
Den of Pitlurg SSSI	Biological: • Upland birch woodland • Valley fen
Dipple Brae SSSI	Geological: • Silurian - Devonian Chordata
Findrassie SSSI	Geological: • Permian - Triassic Reptilia
Gull Nest SSSI	Biological: • Blanket bog
Hill of Towanreef SSSI/SAC	Geological: • Caledonian Igneous Biological: • Calaminarian grassland and serpentine heath • Marsh saxifrage (Saxifraga hirculus) • Upland assemblage • Vascular plant assemblage • **Alpine and subalpine heaths** • **Blanket bog** • **Dry heaths** • **Grasslands on soils rich in heavy metals** • **Juniper on heaths or calcareous grasslands** • **Marsh saxifrage (Saxifraga hirculus)**
Kellas Oakwood SSSI	Biological: • Upland oak woodland
Lethenhill SSSI	Biological: • Fen meadow
Loch Oire SSSI	Biological: • Mesotrophic loch
Loch Spynie SSSI/SPA	Biological: • Breeding bird assemblage • Eutrophic loch • Fen meadow • **Greylag goose (*Anser anser*), non-breeding** • Open water transition fen • Wet woodland
Lossiemouth East Quarry SSSI	Geological: • Permian - Triassic Reptilia
Lossiemouth Shore SSSI	Geological: • Permian - Triassic (red beds)

Lower Findhorn Woods SSSI/SAC	Biological: • Bryophyte assemblage • Lichen assemblage • Oligotrophic river/stream • Upland mixed ash woodland • Upland oak woodland • Wet woodland • **Mixed woodland on base-rich soils associated with rocky slopes**
Lower River Spey SSSI	Biological: • Alder woodland on floodplains • Coastal shingle vegetation outside the reach of waves
Lower Strathavon Woodlands SSSI	Biological: • Upland birch woodland • Upland oak woodland • Wet woodland
Masonshaugh SSSI	Geological: • Permian - Triassic (red beds) • Permian - Triassic Reptilia
Mill Wood SSSI	Biological: • Upland birch woodland
Moidach More SSSI/SAC	Biological: • **Blanket bog**
Moss of Crombie SSSI	Biological: • Intermediate bog (blanket)
Moray and Nairn Coast SPA	Biological: • **Bar-tailed godwit (*Limosa lapponica*), non-breeding** • **Dunlin (*Calidris alpina alpina*), non-breeding** • **Greylag goose, non-breeding** • **Osprey (*Pandion haliaetus*), breeding** • **Oystercatcher (*Haematopus ostralegus*), non-breeding** • **Pink-footed goose (*Anser brachyrhynchus*), non-breeding** • **Red-breasted merganser (*Mergus serrator*), non-breeding** • **Redshank (*Tringa totanus*), non-breeding** • **Waterfowl assemblage, non-breeding** • **Wigeon (*Anas penelope*), non-breeding**
Quarry Wood SSSI	Biological: • Upland oak woodland
Randolph's Leap SSSI	Geological: • Fluvial morphology of Scotland
River Spey SSSI/SAC	Biological: • **Atlantic salmon (*Salmo salar*)** • **Freshwater pearl mussel (*Margaritifera margaritifera*)** • **Otter (*Lutra lutra*)** • **Sea lamprey (*Petromyzon marinus*)**
Scaat Craig SSSI	Geological: • Silurian - Devonian Chordata

Shiel Wood Pastures SSSI	Biological: • Fen meadow • Lowland acid grassland • Lowland calcareous grassland • Lowland neutral grassland
Spey Bay SSSI	Geological: • Coastal Geomorphology of Scotland Biological: • Dingy skipper butterfly (Erynnis tages) • Hydromorphological mire range • Saltmarsh • Shingle • Small blue butterfly (Cupido minimus) • Vascular plant assemblage • Wet woodland
Spynie Quarry SSSI	Geological: • Permian - Triassic Reptilia
Teindland Quarry SSSI	Geological: • Quaternary of Scotland
Tips of Corsemaul and Tom Mor SSSI/SPA	Biological: • **Common gull (*Larus canus*), breeding**
Tynet Burn SSSI	Geological: • Non-marine Devonian • Silurian - Devonian Chordata

There is also one Local Nature Reserve, Findhorn Bay. The site boundaries overlap with the Culbin Sands Culbin Forest and Findhorn Bay SSSI and Moray and Narin Coast SPA.

The SWT reserve, Spey Bay is situated within the Lower River Spey and Spey Bay SAC as well as the Moray Firth SPA.

2.4.2 Habitats

The Habitat Map of Scotland presents broad habitat categories which have been mapped from satellite imagery. It does not give sufficient detail to identify all habitats of conservation importance but can give an indication as to where they may be present. The habitats present within the LDP area can be seen in Plan GIS030, Appendix B. The south and south east of the LDP area is predominantly heathland and mire habitats, associated with uplands. These habitats are almost always Annex I priority habitats of international importance. Moving north and lower in elevation the landscape becomes more mixed with large areas of woodland mixed with cultivated land and grassland. There may be some habitats of international, national or regional importance within the woodland and grassland categories. There are also small patches of coastal habitat in the north, associated with the coastline and estuaries. These are likely to comprise some Annex I and SBL priority habitats such as vegetated sea cliffs.

Ancient and native woodland which both have policy protections within NPF4 Policy 6 are reasonably well mapped, with the locations of these habitats presented in Plan GIS028 in Appendix B. All native woodlands correspond to internationally important Annex I habitats and/or nationally important SBL habitats. Many native woodlands are fragmented and face pressures from high levels of deer and

livestock grazing/browsing preventing re-generation, INNS out-competing native trees and/or ground flora and the spread of pest and diseases.

The soil map presented in plan GIS029 in Appendix B shows the location of class 1 and 2 peatlands which are protected under policy 5. The habitats on these peat rich soils are most likely to be Annex I blanket and raised bogs or fens. The majority of these have been degraded through historical incentives to drain them for agriculture and forestry, upland management practices such as burning and intensive grazing/browsing and trampling by deer and livestock.

Both woodland and peatlands play an integral role for long term carbon sequestration and storage, as well as being important for natural flood defence. As such they are key habitats to target for restoration and creation.

2.4.3 Protected Species

The NESBReC data request returned 21,104 records of 390 species of protected or notable species which are of national or international importance within the Moray LDP area. There were also 2291 records for 190 locally important species. The location of these records can be seen on Plans GIS023, 024 and 025 in Appendix B. A summary of the records showing the species, number of records and level of protection are presented in Appendix C.

Areas of importance for protected species or species groups were identified from additional sources as described below and can be seen in Plan GIS027, Appendix B.

The Findhorn and Culbin IIA is within the Moray LDP area. At the time of writing Buglife had not yet published a full profile for the site but they indicated that the site was selected for the following species:

- Freshwater Pearl Mussel (*Margaritifera margaritifera*)
- Aspen Hoverfly (*Hammerschmidtia ferruginea*)
- Northern Robberfly (*Rhadiurgus variabilis*)
- The cranefly (*Tipula nodicornis)*
- Kentish Glory (*Endromis versicolora*)
- Cloaked Pug (*Eupithecia abietaria*)
- April Melangyna Hoverfly (*Melangyna barbifrons*)
- Golden Net-wing Beetle (*Dictyoptera aurora*)
- Pinewood Mason Bee (*Osmia uncinata*)
- Pearl-bordered Fritillary (*Boloria euphrosyne*)
- Northern Damselfly (Coenagrion hastulatum)
- White-faced Darter (*Leucorrhinia dubia*)
- The false clown beetle *Sphaerites glabratus*
- The spider *Silometopus incurvatus*

Any developments within or adjacent to the IIA should seek to retain any existing habitat for these species and enhance or create additional habitat.

There is one current and one historic Wildcat Priority Area partially within the LDP area. These are both situated in the south, associated with the upper Glenfiddich Valley and River Deveron valley respectively. Wildcat in Scotland have been declared functionally extinct[20], however, with a

[20] Campbell R. D., Gaywood M.J., & Kitchener A.C. (Eds.) 2023. Scottish Wildcat Action: Final Summary Report. NatureScot, Inverness. Available at: https://www.nature.scot/doc/scottish-wildcat-action-swa-final-summary-report-2023 (Accessed 22/11/2023)

conservation breeding and release programme underway, improvements to habitats used by wildcats and their prey. These priority areas should therefore still be considered important within the context of potential future use.

The RSPB highlighted the importance of farmland as a habitat for breeding waders in the north east of Scotland, many of which have suffered population declines linked to loss of habitat through drainage of lowland wetlands and agricultural intensification. Figure 2-1 below is taken from the report on important areas for farmland waders[21] and shows the relative density of the species studied (Curlew (*Numenius arquata)*, Oyster Catcher (*Haematopus ostralegus*), Snipe (*Gallinago gallinago*), Redshank (*Tringa tetanus*) and Lapwing (*Vanellus vanellus*)). Within the Moray LDP area there are high densities within the upland areas in the south and some scattered areas of medium density. Wetland creation within proposed development areas could benefit these species and help to reverse historical declines in habitat availability.

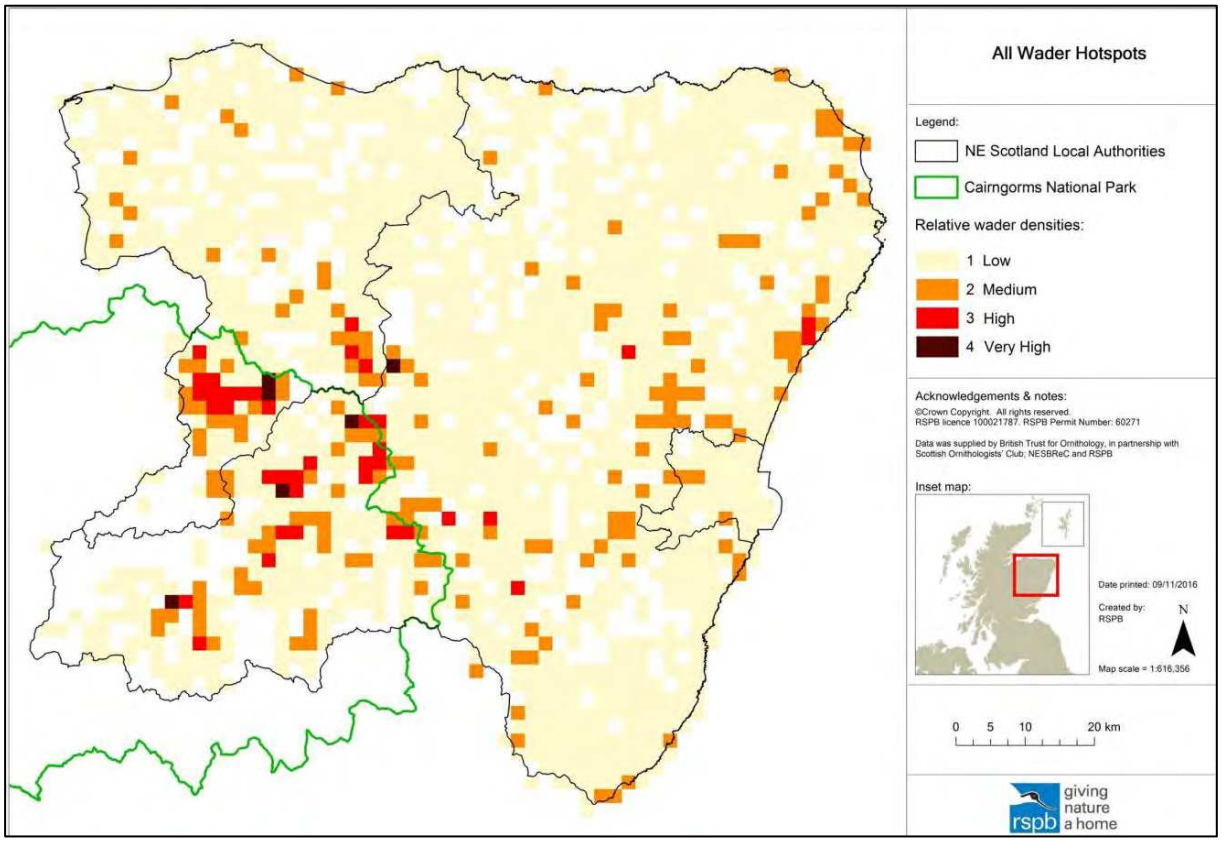


Figure 2-1: Map showing the combined relative densities of all five wader species.

2.4.4 INNS

As highlighted in section 2.1, INNS are a key threat to our biodiversity. They can outcompete native species in terms of space, food or other resources. They can predate on native species, cause or spread disease, alter habitat structure and functionality, and dilute gene pools through hybridisation. Some species can cause damage to infrastructure and be detrimental to human health.

There is a legal requirement to not spread or cause non-native species to grow in the wild. In terms of planning, developments should seek to avoid adverse impacts to the environment through the spread of INNS. It is important for Planning Authorities to know what species may be present where so they can help identify when developments may require targeted survey and management plans in relation

[21] RSPB (2016) Important Areas for Breeding Farmland Waders in North East Scotland.

to INNS. Habitats which contain INNS also represent an opportunity for habitat enhancement and restoration through management and eradication of non-native species.

The NESBReC data search returned 563 records of INNS. These were largely associated with riparian corridors. Species included:

- American skunk cabbage (*Lysichiton americanus*)
- Giant hogweed (*Heracleum mantegazzianum*)
- Himalayan balsam (*Impatiens glandulifera*)
- Himalayan knotweed (*Persicaria wallichii*)
- Japanese knotweed (*Fallopia japonica*)
- Rhododendron (*Rhododendron ponticum*)
- White butterbur (*Petasites albus*)

The location of the records can be found in Plan GIS026 within Appendix B. No records of monkey flower (*Mimulus* spp.) were returned from NESBReC however it is known by the authors of the report to be particularly widespread in water courses and drainage ditches within Moray (and the north east generally). Several locations were identified when undertaking field work in relation to other aspects of the project.

3 SITE REVIEWS

3.1 Sites of Interest to Natural Science

3.1.1 Background

There are 36 historically designated SINS sites within the Moray LDP area. Two of these were designated for geological purposes with the rest being either solely designated for biological features or a mix of biological and geological. At the time of writing, beyond being biological or geological in nature, no information was available as to features the sites were originally designated for or what the status of those features might be now.

There is potential for locally designated sites, given policy protection within the LDP such as SINS, to form part of future Nature Networks and to contribute towards the 30x30 sites as Other Effective Area-Based Conservation Measures (OECMs)[22]. LDPs must facilitate the creation of nature networks as a requirement of NPF4 Policy 3. As such, this review aimed to determine what features of biological importance are present within these sites currently and to provide recommendations as to their potential future value within the protected site network.

3.1.2 Methods

The desk study information gathered to inform the Priority Species and Habitat objectives (as described in section 2.1) was reviewed to identify current data relating to the SINS. All but 10 of the SINS overlap with designated sites (SSSI/SPA/SAC), although often the SINS areas extend beyond the designated site boundaries. In the process of prioritising SINS sites to survey, it was agreed with Moray Council that those sites associated designated sites would not be visited as reasons of designation are presumed to be relate to the statutory designations. The condition of features within statutory designated sites is monitored by NatureScot and it was considered that there would be little to gain from the surveys. Field visits thus concentrated on the SINS which were not associated with statutory designated sites, aside from the Loch Park and Ben Rinnes sites which are both well used for leisure activities and the report authors already had reasonable knowledge of the sites. Two sites which overlapped, in part, with other designations were also visited as there were extended areas outside of the designated areas and it wasn't clear what was present there. A plan of the SINS, showing those surveyed can be found in Appendix D. The justifications for surveying or otherwise are presented alongside the results table 3-1.

Field visits were conducted by Envirocentre Lead Consultant, Jake Brendish ACIEEM and Consultant Ecologist Scott Fraser ACIEEM, assisted by Graduate Ecologist Antonia Stewart. The surveys were undertaken between the 10th and 13th of July. Weather conditions were variable with some sunshine and rain showers. Temperatures ranged from 11°C - 18 °C. The survey comprised of a UKHabs classification survey, with any evidence of protected or notable species target noted. A UK Habitat Classification (UKHab) Survey was carried out in accordance with the user manual[23]. UKHab is a hierarchical system for rapidly recording and classifying habitat via satellite imagery and field survey.

[22] A geographically defined area other than a Protected Area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in-situ conservation of biodiversity, with associated ecosystem functions and services and where applicable, cultural, spiritual, socio–economic, and other locally relevant values.

[23] Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020) The UK Habitat Classification User Manual Version 1.1 available at: https://ukhab.org/ (Note: version has been updated since field work was undertaken and is no longer available on the website)

The system comprises 5 levels of Primary Habitats which include ecosystems, broad habitats, priority habitats and Annex I habitats, along with non-hierarchical secondary codes which provide information on the environment, management and origin of Primary Habitats. The secondary codes are also used to map habitat mosaics and identify notable species features. The information collected is used to identify ecologically sensitive features and recommend mitigation and enhancement measures in connection with a proposed development.

The surveyor utilised the UKHab Professional edition with a Minimum Mapping Unit (MMU) of 25m^2 and aimed to categorise habitats up to level 5. Where the level 5 habitat could not be determined or is not reflective of the habitat type due to a lack of indicative species, habitats were categorised to level 4 or the broader level 3 habitat.

The information is used to identify ecologically sensitive features/habitats, inform relevant species surveys and, aid in the recommendation of mitigation and enhancement measures in connection with a proposed development.

Targeted protected species were not undertaken but any field evidence of protected or notable species were noted, along with observations on management.

3.1.3 Results

The results of the desk study and field studies are presented within table 3-1 below and Appendix D Plans GIS013 - 021. The sites which sit entirely within existing SSSIs do not add any value in terms of nature networks. The former SINCS which are associated with SSSIs but extend outside of the site boundary could act as valuable buffer for the designated site features to protect them from edge effects, as shown in figure 4-1. All of the sites surveyed had areas of internationally, nationally and locally important priority habitats and/or species associated with them. The many were found to be in poor condition with opportunities for enhancement. INNS were present at several sites. Peatland sites notably had been affected extensively by drainage and had either been intentionally afforested in parts or were becoming afforested through natural regeneration of windblown seeds landing on the artificially dry bog surface. This secondary tree growth further exacerbates drying.

Sites with priority habitats would benefit from a baseline condition assessment to inform further management actions required for restoration. Target surveys for species groups such as invertebrates may also be beneficial to ensure that priority species are identified so appropriate management can be implemented.

Table 3-1: SINS Desk Study and Field Survey Results

No	Site Name	SSSI	Biological/ Geological	Peat	AWI	IIA	NESBReC Records	Habitat Notes	Field Visit Justification	Field Survey Results and Recommendations
2	Findhorn Valley	Y	B	Y	Y	Y	Y (many mammals as well as priority plant species and INNS, slow worm, lepidoptera, various birds) None in smaller adjacent area	Incorporates the SSSI and associated catchment and forestry extensions (Mostly on AWI) to east and west, two freshwater bodies to the east, small areas of agricultural fields and residential buildings. Includes additional polygon to east - possibly heath/bog.	Y (separate area to east) Not clear why the separate area was designated.	Predominantly blanket bog and wet heath (Annex I habitats) with scattered pine. Natural hydrological regime affected by drainage and afforestation of adjacent land. Tree regeneration occurring on dried areas further exacerbating drying. Potential for restoration of peatland. NVC and peat depth survey would be needed as a starting point to establish restoration feasibility.

4	Quarry Wood	Y	BG	Y (Several red squirrel and some birds) none in smaller annex area.	Includes Cutties Hillock and Quarry wood SSSI as well as the wider Quarry wood area which is also on AWI. Separate area to the east - small area of AWI but also housing and agricultural area.	Y (separate area to east) Assumed main area designation is related to the SSSI. Smaller area not obvious. Could be related to geology rather than biological.	Habitats in west associated with agriculture and private housing with little conservation value. Eastern half of the site comprises Upland Birch SBL priority habitat. Non-native species present. Potential for enhancement through removal. NVC and condition assessment would help to inform further management actions.

12	Portknockie - Cullen	Y	BG	Y (small blue butterfly (many), various birds, otter, charlock, INNS – Japanese knotweed and Himalayan balsalm, fragrant orchid, sea aster, saltmarsh flat-sedge and northern salt-marsh grass)	Includes Cullen to Stakeness SSSI and wider coastline. Predominantly vegetated cliffs but also the Cullen Sands Golf links and some agricultural land.	Y The golf course and agricultural area to the north (land east of Port Knockie) should be checked as unlikley to be of nature conservation importance. The area of coastline to the west of Portknockie appears to be vegetated cliffs which are an important habitat in themselves but also for birds in the adjacent Moray SPA	Habitats include Annex I vegetated sea cliffs and sand dunes as well as urban, modified grassland and agricultural habitats of less value to biodiversity. INNS white butterbur was present in the east and west of the site, with Himalayan balsam also identified in the west of the site along Jenny's Burn and Slack Burn. Birds identified in this site included Black Headed Gull, Herring Gull, Heron, Sky Lark, Cormorant, Osprey, Gannet and Stonechat. Invertebrates identified included butterflies such as painted ladies, meadow brown and small blue and bees such as red-tailed bees and common carder bees. The additional SINS area comprises some valuable habitat which is evidenced by the presence of notable

									species such as the small blue butterfly, which is the focus of a Species on the Edge project in the area. Enhancements could be made through INNS removal. Targeted invertebrate and botanical surveys would help inform further species specific management requirements for these groups.
1	Culbin, Findhorn and Burgehead Bay	Y	BG		Y	Y	Y (small blue and other lepidoptera, red squirrel, badger, common lizard, various birds, pine marten, brown hare, hedgehog)	Extention of SSSI including more of the Findhorn and surrounding agricultural area to the south and Roseisle forest to the west. Includes part of the Findhorn IIA.	N Designation assumed to be in relation to designated site features.	
3	Burghead / Covesea	Y	BG				Y (several small blue and small heath butterfly, common lizard, pine marten, peregrine, otter)	Includes 2 geological SSSIs and coastline around Hopeman. Largely beach and vegetated cliffs but east of Hopeman includes an area of Golf course, woodlands, a Quarry and farmland.	N Designation assumed to be in relation to designated site features.	

5	Spynie	Y	BG	Y	Y (many, bats, badgers, red squirrels, lizards, otter, marsh harrier, barn owl, water shrew, various other birds)	Includes Spynie and Spynie Quarry SSSI and SPA as well as surrounding catchment (agricultural and forestry, some wetlands)	N Designation assumed to be in relation to designated site features.
6	Spey, Garmoh - Boat O' Brig	Y	BG	Y	Y (Many bird, plant and mammal and INNS)	Includes farmland and woodland surrounding Spey SAC/SSSI as well as Dipple Brae SSSI (Geological). Some residential and farm buildings included too.	N Designation assumed to be in relation to designated site features.
7	Spey, Boar O' Brig - Ballindalloch	Y	BG	Y	Y (many protected mammals, plants birds as well as INNS)	Riparian area associated with the Spey SAC/SSSI. Includes some areas of AWI but mostly farmland and some built up areas (inc. Aberlour to north of High Street)	N Designation assumed to be in relation to designated site features.
8	Lhanbryde Lochs	Y	BG	Y	Y (Osprey, badger, red squirrel, pine marten, Scottish wood ant, sea trout, eel, INNS)	Includes Loch Oire SSSI as well as adjacent Loch na Bo and 3 smaller unamed water bodies and surrounding woodland which is on AWI.	N Designation assumed to be in relation to designated site features.

9	Tynet	Y	G				Includes part of the Tynet Burn SSSI (Geological) as well as an extention of the Burn, associated ponds, small area of woodland, agriculutral fields and housing.	N Designation assumed to be in relation to designated site features.
17	The Buck/ Hill of Towanreef	Y	B	Y		Y (Many bird, plant and mammal)	Entirely within the SAC/SSSI	N Designation assumed to be in relation to designated site features.
130	Sheil Moss	Y	B	Y		N	Entirely within the SSSI	N Designation assumed to be in relation to designated site features.
132	Den of Pitlurg	Y	B		Y	Y (early purple orchid, spotted flycatcher)	Riparian woodland, AWI entirely within SSSI	N Designation assumed to be in relation to designated site features.

141	South West Moray Moors Lochans	Y	B	Y	Y	Y	Y (many including juniper, black grouse, water vole, red squirrel, lepidoptera)	Large upland area encompassing Moidach More SSSI/SAC, also small area of IIA, water course headlands. Includes 2 windfarms.	N Designation assumed to be in relation to designated site features.
142	Kellas Oakwood	Y	B		Y		N	Broadleaved ancient woodland within Kellas Oakwood SSSI	N Designation assumed to be in relation to designated site features.
143	Lower Strathavon / Hills of Cromdale	Y	B	Y	Y		Y (many including Coral root orchid, small cranberry, red squirrel, black grouse, fragrant orchid, brown hare, mountain hare	Large upland Spey catchment, lower areas include Strathavon woodlands SSSI as well as Spey SAC. Class 1 peat on plateaux. Southern half outwith the LDP area.	N Designation assumed to be in relation to designated site features.
144	Scaat Craig	Y	G		Y		N	Encompasses the Scaat Craig SSSI and some associated woodland some on AWI. Also includes an agricultural field and some housing.	N Designation assumed to be in relation to designated site features.

145	Moss of Birnie	Y	BG	Y		Y (many, largely bird spp, common lizard, baltic rush)	Gull nest and Buinach and Glenlatterach SSSI for small part. Large upland area, blanket bog habitat with Class 1 and 2 peatland. Windfarm present.	N Designation assumed to be in relation to designated site features.
146	Maggiekn ockater	Y	B		Y	Y (red squirrel, water vole, various birds, plant spp invsive and priority)	Spey SAC and wider catchment including areas on AWI	N Designation assumed to be in relation to designated site features.
147	Giants Chair	Y	B		Y	Y (bats, badger, various plant spp priority and invasive)	Spey SAC and wider catchment including areas on AWI	N Designation assumed to be in relation to designated site features.
150	Mill Wood	Y	B		Y	Y (Invasives white butterbur, JKW and GH as well as priority botanical spp)	Almost entirely within SSSI, some additional area in south including a further area of woodland and some agricultural fields	N Designation assumed to be in relation to designated site features.
152	Spey Bay	Y	BG	Y	Y	Y (many small blue butterfly, lots plants priority and INNS, lots red squirrel, lizard, various birds and other lepidoptera)	Includes Spey Bay SSSI and wider Lossie Forest area	N Designation assumed to be in relation to designated site features.

155	Moss of Crombie	Y	B	Y			Inclues Mill of Crombie SSSI	N Designation assumed to be in relation to designated site features.
189	Brown Muir / Teindland	Y	BG			Y (otter, badger, red squirrel, lizard, wildcat, pine marten, bats, various birds, fragrant orchid, frog orchid, lesser butterfly orchid, small pear bordered fritillary)	Upland and forestry including Coleburn Pasture SSSI/SAC and Teindland Quarry SSSI (Geological) Spey catchment area.	N Wide area outside of SSSIs designated but likely associated with wider Spey catchment.
148	Glen Liven/ Glenfiddich and Cabrach	Y (very small area)	B	Y	Y	Y (Large area so many for variety of mammals, plants birds etc)	Large upland area encompassing several areas of blanket bog, River Spey headlands as well as some plantation forestry, heath and lowland grasslands/agricultural areas. Also the location of several existing and proposed windfarms	N Large area difficult to survey in detail within period of the study but much of it has been surveyed in relation to windfarms and so should be reasonable data relating to the site in the public domain.

10	Buckie	BG	Y (small cudweed and INNS – Japanese knotweed)	Coastal	Y Unsure of feature to be protected - presumed habitat but would be good to confirm status.	The site's shoreline consists of a pebble shingle beach leading into littoral sediment at the mid-shore and littoral rock at the far shore. The west of the site contains short, bare, neglected modified grassland, with stands of scrub and escaped garden shrubs evident throughout. Habitats are not of particular conservation importance themselves but there is potential for improvements to be made to eg. grassland to enhance for coastal species such as the small blue butterfly.

11	Portessie	B	N	Coastal	Y Unsure of feature to be protected - presumed habitat but would be good to confirm status	The site consists of littoral rock, with a shingle beach and short mown amenity modified grassland. Habitats are not of particular conservation importance themselves but there is potential for improvements to be made to eg. grassland to enhance for coastal species such as the small blue butterfly.
131	Craibston e Quarry	B	Y (common twayblade + early purple orchid)	Small area of Riparian woodland	Y Unsure of feature to be protected - presumed habitat but would be good to confirm current status	Lowland mixed deciduous woodland SBL priority habitat. Overgrown, with areas of dense scrub. INNS monkey flower present within water course. Potential for enhancement through INNS removal and active management. Recommend NVC and condition assessment to inform further recommendations.

151	Bin of Cullen	B	Y	Y (red squirrel, badger, pine marten, Juniper)	Plantation on site of Ancient Woodland with some heath	Y Designation probably related to habitats but would be good to confirm habitat/any notable species in understory	Scots pine plantations are and NESBiP priority habitat and heaths are Annex I priority habitats. Potential for enhancement. Recommend NVC and condition assessment to further inform actions.
156	Rowan Bauds	B	Y	Y (Cuckoo)	Lowland woodland/ wet woodland/Fen	Y Presume priority habitat present but good to confirm as not clear from aerial imagery/desk study info	Annex I blanket bog with pinewood and wet woodland, and tall herb fen. Notable species include heath fragrant orchid, lesser butterfly-orchid and lesser twayblade. Evidence modification of hydrology through drainage and afforestry. Potential for peatland restoration. Recommend NVC and peat depth survey to inform initial feasibility assessment.

158	Craigmancie (part)	B	Y	N	Extention of site across border with Aberdeenshire - LNCS description "Woodland on steep sided slopes of Deveron valley with ash woodland, rush pasture, lowland fen and acid grassland together with riparian habitats alongside the River Deveron" Woodland and part agriculutral field in Moray.	Y assumed habitats related to those in Aberdeenshire portion but not clear from desk study.	SBL birch woodlands present. INNS giant hogweed present. Potential for enhancement. Recommend NVC and condition assessment survey to inform further actions.

3.2 Spatial Analysis of Biodiversity Areas for Protection and Enhancement

The Lawton's 2010 Making Space for Nature report[24] was a landmark publication setting out a new approach to Nature Conservation in the UK. The report was focussed on England, but given the shared legislative history in terms of nature conservation, the recommendations in the report are broadly applicable to Scotland and the rest of the UK as well. The report concludes that the designated site network are not sufficient to protect species and habitats in the longer term. In order for these protected areas to be successful, they need to be connected via ecological networks which allow the movement of species and their genes to maintain diversity and ability to adapt to a changing environment. They go on to define an ecological network as core protected sites connected through buffer zones, 'stepping stones' of smaller local protected sites and wildlife corridors. Corridors do not need to comprise continuous physical connections but can be a mosaic of habitat types which create a permeable landscape for species to move though. These may include but are not limited to:

- Watercourses and riparian habitats
- Ponds
- Priority habitats such as heathland, species rich grassland or sand dunes
- Farmland
- Woodland
- Hedgerows
- Gardens
- Allotments
- Urban greenspaces

[24] Lawton, J. *et. al.* (2010) Making Space for Nature: A review of England's Wildlife Sites and Ecological Network. Report to DEFRA. Available at: https://webarchive.nationalarchives.gov.uk/ukgwa/20130402170324mp_/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf (Accessed 31/01/2024)

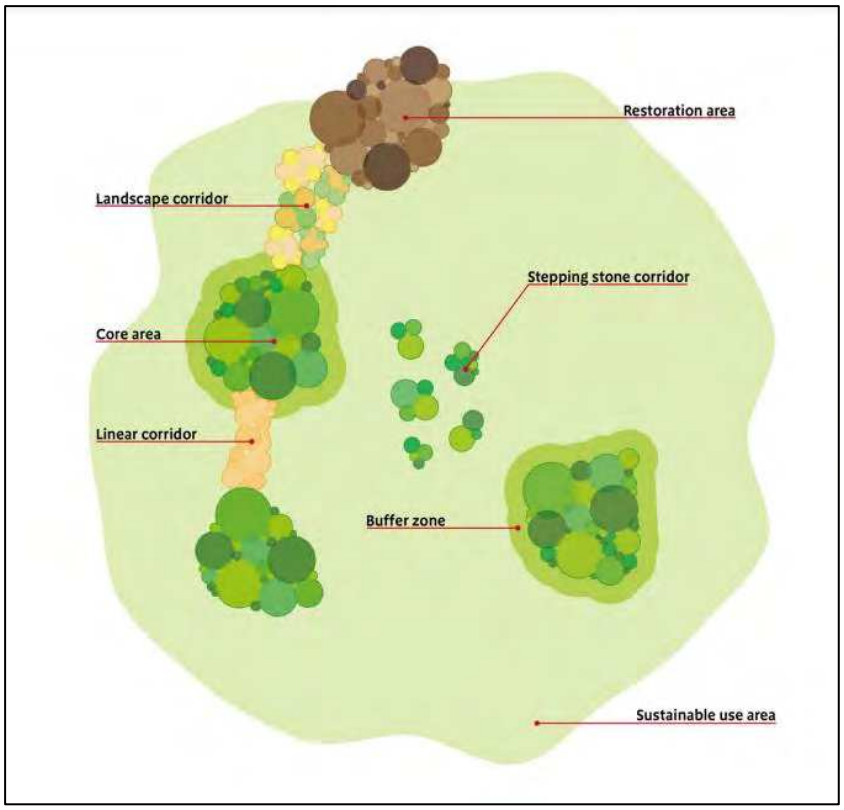


Figure 3-1: Components of an ecological network. Image Source: Making Space for Nature Report.

In is recommended that the following strategic links are investigated for potential to form part of the future Moray Nature Networks:

- Riparian corridors are an important habitat in themselves, but they also form key dispersal route through the landscape for many species. There are many habitats of importance for biodiversity along Spey and Findhorn rivers such as native and ancient woodlands but these are small and fragmented. The river corridors are also a key area of INNS.
- Areas of large, monoculture habitats, such as plantation woodlands could be made more permeable through the inclusion of more diverse woodland planting, including mixed native planting. Improvements to riparian corridors flowing through the plantations and opening areas up to include wetlands and areas of grassland or heath would also be beneficial.
- Similarly agricultural land can include areas more intensively managed grass or arable land. Planting of trees and hedgrows, wetland creation and management of field margins for wildlife can create a more diverse range of habitats for species to move through.
- Green and blue corridors are also vital within urban landscapes.
- Coastal habitats are important areas for biodiversity but are fragmented due to landward squeeze related to development, agriculture and sea defences as well as erosion on the seaward side. Better connection of these habitats through restoration and creation of new habitats would expand habitat for specialist coastal species such as the small blue butterfly and better connect populations, allowing for greater genetic mixing and resilience to climate change.

A plan showing the location of existing protected areas and those given policy protection alongside the potential connections which are listed above can be seen in Appendix E.

4 BIODIVERSITY ENHANCEMENTS THROUGH THE PLANNING SYSTEM

4.1 Review of Existing Policies and Guidance

4.1.1 Policy

In order to understand the additional policy and/or guidance needed to support the future LDP, a line by line gap analysis of the NPF4 Policy wording relevant to biodiversity and current equivalent LDP text (where it exists) was undertaken (including supporting guidance). The full gap analysis is presented in Appendix F. Out of 20 policy points, 13 have been identified as either needing wording strengthened or additional policy text or supporting guidance added to fully implement NPF4. Current LDP policy and guidance relating to protections of existing natural heritage (primarily designated sites and protected species) is largely in line with NPF4 as it stands. The areas requiring additional text relate to the implementation of Policy 3 by setting out requirements for enhancement at the different development hierarchies (National and Major vs Local). Guidance setting out how developers should demonstrate their biodiversity enhancements is also required. At the time of writing a Scotland specific metric tool is being developed but there are existing tools (eg DEFRA Biodiversity Net Gain metric) which are already being used, in an adapted form, where required, by developers in Scotland. Policies in relation to protection of soils also need to be revised, setting out specific circumstances where developments on carbon rich soils (peatlands) and prime agricultural land will be considered, as well as guidance on supporting documents required to assess impacts to the soil environment. The trees and woodland policies are aligned for the most part, however wording setting out protection of individual trees of biodiversity value outside of woodlands is needed.

4.1.2 Guidance

The existing Moray Council planning guidance which supports the LDP was also reviewed alongside guidance released by NatureScot on Developing with Nature[25] and the North East Biodiversity Partnership (NESBiP) developer hub information on habitats and species important to the North East. The aim of this review was to determine if additional guidance is required to implement NPF4 and provide protection to species and habitats of specific importance to Moray. Given the extensive wording of the documents, a point by point gap analysis has not been made but a summary of the guidance documents is provided below, followed by recommendations for inclusions in future LDP guidance.

<u>Moray Council LDP Supporting Guidance</u>

The guidance for PP1 Placemaking sets out the requirement for a ‘Biodiversity Plan’ to be included within the Placemaking Statement states that it should:

- *“Demonstrate a significant gain in biodiversity across the site (i.e. after development biodiversity is in a better state than before development), halts the loss of biodiversity, and creates blue-green networks;*
- *Demonstrate that planting for biodiversity contributes to the character and identity of the place through colour, variation and species selection;*
- *Demonstrate how the proposal supports the Pollinator Strategy for Scotland;*

[25] Available at: https://www.nature.scot/doc/developing-nature-guidance (Accessed 26/09/2023)

- *Demonstrate compensatory habitats have been created on-site for any loss in habitats of ecological amenity value as a result of the development;*
- *Include an Ecological Survey where proposals result in the loss of valuable habitats to evidence that the most suitable actions have been identified."*

It then goes on to provide excellent examples of the mechanisms which developers can employ to achieve biodiversity gains and the ecological survey requirements:

"Ecological Surveys must be provided for proposals that involve the loss of valuable habitats and include:

- *Adequate survey information gathered before preparing detailed site layouts for masterplans; and,*
- *Schedule surveys into the development timetable given that many surveys can only be taken at specific times of the year www.nesbiodiversity.org.uk/wpcontent/uploads/2019/07/SNHSurveyCalendar-modifiedforACCFINAL.pdf*"

NatureScot Developing with Nature Guidance

This document is aimed at providing developers with the information they need to incorporate enhancement for Local developments which fall under NPF4 Policy 3(c). These projects, due to their scale and setting may not have professional ecological input and so the document sets out information needed for developers to meet the policy and demonstrate compliance through the planning process. It describes the general principles of biodiversity enhancement, as well as the appropriate scale and nature of actions which can be taken as well as practical guidance on the implementation of these actions. It also provides links to key resources to inform Biodiversity Plans.

NESBiP Developers Hub

The NESBiP Developers Hub provides a range of information aimed at guiding developers to information, tools and resources which can be used to safeguard and enhance biodiversity within development designs. Two of the key resources provided on the website are the Locally Important Species lists and the Habitat Statements. These set out species and habitats which are of are of importance within the north east of Scotland. Some of these receive protection under other national policies or legislation (eg habitats on the Scottish Biodiversity List) but many do not (eg Scot's pine plantations). The species list comprises plants, fungi and one mammal, the water shrew (*Neomys fodiens*).

Recommendations

There are several key principles within the Developing with Nature guidance which are not set out clearly within the Moray LDP plan (such as the requirements for plans to consider how the longer-term management and retention of enhancement measures will be secured). The NatureScot guidance is fairly comprehensive and does not need to be replicated in full within the Moray LDP guidance. Instead, it should be referred to where appropriate and a link provided for developers to follow.

The Developing with Nature guidance emphasises the need for developers to incorporate measures which are a priority at a local level either spatially (eg nature networks) or to benefit local priority species and habitats. This is where the Moray guidance can add additional context. At present the guidance links to the NESBiP developers Hub but doesn't specify any requirement to consider the locally important species and habitats or put forward desirable actions relating to them.

It should also be noted that the LDP guidance currently states that ecological surveys are only required to accompany development proposals where there will be loss of 'valuable habitat'. However, it doesn't define what is meant by valuable habitat and so the situations where expert input is required is not clear. Some further guidance at to when ecological surveys are required would be beneficial in protecting existing natural heritage features and would help developers plan their programme appropriately. The Wildlife Check Tool[26] linked on the NESBiP website could be promoted to aid the assessment. Alternatively, Moray Council could provide a checklist or spatial tool more in line with local priorities and constraints.

4.2 Review of Local Authority 'Best Practice'

A review of Local Authority guidance was conducted through a search on LDP policies and guidance in May 2023. At that time Aberdeenshire Council were the only LA which had produced guidance which set out how developers were to demonstrate biodiversity enhancements, and which also defined what they considered to be the '*best practice assessment method*'. as per NPF4 Policy 3.b).

Aberdeenshire council released supplementary planning guidance "*Securing positive effects for biodiversity in new development Planning advice PA2023-10*" in February 2023, which provides guidance on how to assess the biodiversity value of sites before and after development, using best practice methods available, to clearly and transparently demonstrate biodiversity gains or losses resulting from development. The guidance was developed by the councils Environmental Planners and the Planning Policy Team in response the NPF4 Policy 3 which sets out the requirement for developments to provide an overall positive effect on the environment. It promotes the use of Preliminary Ecological Appraisals to gather baseline ecological data early in the design process so that existing natural heritage can be protected and opportunities for enhancements can be maximised. It also recommends the use of DEFRA's Biodiversity Net Gain tool, as the best available metric for calculating the change in biodiversity value pre- and post- development. This approach is in line with recent research published by the Scottish Government on biodiversity metrics. The guidance then sets out the requirements for a plan to show how the biodiversity enhancements will be delivered. For smaller sites this is likely through a landscape plan. Larger developments should provide a dedicated Biodiversity Action Plan/Habitat Management Plan which details the method of habitat enhancement and/or creation, timescales for delivery and responsible parties. These plans are also required to include management and a monitoring plan to help secure the successful establishment of the habitats in the longer term. The guidance document provides clear guidance on what developers need to provide though the planning process in order to demonstrate overall positive effects on biodiversity. It is also in line with the good practice principles for biodiversity net gain developed by the Chartered Institute of Ecology and Environmental Management (CIEEM), the Institute of Environmental Management and Assessment (IEMA) and the Construction Industry Research and Information Association (CIRIA)[27].

A discussion was held with one of Aberdeenshire Council's Environmental Planners to hear about their experience implementing the guidance to date. Below are key points summarising the discussion:

- The council is still in a transition phase of implementation. A lot of housing developments coming through at the minute are part of already consented masterplans but this is expected to change as sites identified in the LDP come forward. These will be expected to complete BNG assessments. There are a few energy related projects coming through which are also being asked to provide BNG assessments (some of the developers already use this as standard).

[26] Available at: https://www.biodiversityinplanning.org/wildlife-assessment-check/ (Accessed 01/10/2023)

[27] Biodiversity Net Gain: Good practice principles for development © CIEEM, CIRIA, IEMA, 2016. Available at: https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf (Accessed 01/12/2023)

- The areas identified within the LDP for development are generally of "low biodiversity value" eg agricultural land, and as such it is expected that biodiversity gains will be achievable and for the most part can be delivered within the site.
- There is no real structure or framework in place yet for securing off-site delivery of biodiversity gains. This is an issue nationally.
- The DEFRA metric is based solely on habitats but the council are looking for species specific measures to be included as well (eg reptile refugia, bat and bird boxes). There may also be circumstances where habitat creation doesn't meet the metric trading rules (where lost habitats needs to be replaced by similar habitat eg grassland for grassland) but does deliver for species specific needs, than the council are willing to take a pragmatic approach as long as it can be properly justified.
- In terms of staff resource the council employ 3 part-time and 1 full time Environmental Planners. The total number of annual planning applications received by the council is around 3500. The Environmental Planners helped to develop the LDP policies and subsequent guidance documents. They look at all the biodiversity plans accompanying planning applications as well the BNG assessments. They also provide comment in relation to other aspects of natural heritage within development planning (eg designated sites and protected species).
- Whilst they are still finding their feet with the BNG assessments it is anticipated that a straight forward plan (on a site where no higher value habitats are affected) may only take a couple of hours to look at. For more complex sites this could be significantly more with iterative work required. As well as looking at the BNG assessment when the application comes through, there may be pre-application advice given and there may be post-construction checks on monitoring reports submitted to demonstrate compliance with planning conditions.
- The Environmental Planners haven't had any structured training on the BNG metric but they have attended seminars and workshops relating to biodiversity gains within the planning system and read the guidance accompanying the metric. They have also had practitioners come in to speak to them.
- The value of having staff with both an understanding of ecology and the planning process was highlighted. This combination allows for meaningful engagement with the rest of the development management team and robust evaluation of the biodiversity plans/BNG metric assessment in line with local and national policy. There was a question on whether advice from an outside third party would be valued in the same way as that provided by internal staff. If the environmental planners object to a development, then that needs to be dealt with. There would need to be a framework in place to ensure that external advice was not overlooked or disregarded if it were to be used.

4.3 Resource Analysis for Implementation

NPF4 requires National and Major developments, and developments requiring Environmental Impact Assessment (EIA) to demonstrate that their proposals will result in biodiversity enhancements in order to be supported. It also states that this must be demonstrated using "best practice assessment methods". As noted within the NPF4 gap analysis presented in Appendix F, the best practice method has yet to be determined. At present the DEFRA BNG tool or adapted versions of this are already being utilised by developers and requested by Local Authorities (as per section 4.2). Recently published research into biodiversity metrics suggest that this is likely to be the approach developed for use in Scotland.

The Local Government Associations Planning Advise Service (PAS) has published guidance for resourcing Biodiversity Net Gain for Local Authorities[28]. This guidance is aimed at LA's in England but is considered that it would be applicable ins Scotland as well. It states that the implementation of BNG

[28] Available at: https://www.local.gov.uk/pas/topics/environment/biodiversity-net-gain-local-authorities/resourcing-biodiversity-net-gain (Accessed 02/10/2023)

will require LA's to undertake the following (note: in Scotland the requirements for BNG would be policy not legislation):

- *"Process and determine planning applications to ensure they meet the legislative requirements, including an accompanying BNG statement.*
- *Assess and approve biodiversity gain plans to ensure they meet legislative requirements.*
- *Secure obligations through legal agreements linked to the grant of planning permission for offsite BNG delivery.*
- *Monitor compliance with planning conditions and legal agreements in relation to BNG.*
- *Report on BNG delivery and plans in their authority area."*

One of the key areas of skills and expertise PAS state is needed to deliver BNG (or a Scottish equivalent) is natural environment and ecological skills, in particular habitat survey and classification, using metrics in habitat assessment, EIA and mitigation, interpretating results and critical analysis. Tasks which will require these skills include:

- *"Helping inform planning policy to reflect biodiversity net gain requirements and locally specific circumstances (such as local ecological networks, LNRS), ensuring join-up with other policies in the Local Plan and advising on a relevant evidence base and monitoring.*
- *Advising on and inputting to other relevant planning documents, such as Supplementary Planning Documents (SPDs), guidance for developers and local validation checklists.*
- *Assessment of Biodiversity Metric calculations, BNG statements and biodiversity gain plans submitted by developers to ensure they meet national and local requirements, including whether on and off-site provision of BNG is acceptable and appropriate – looking beyond the numbers to check that plans make sense ecologically. Providing pre-application advice on these and other elements relating to BNG; negotiating with developers.*
- *Providing advice to councillors, including at Planning Committee.*
- *Assessing offsite biodiversity provision to ensure it meets requirements.*
- *Checking monitoring reports to ensure compliance and where necessary, assisting enforcement officers.*
- *Survey and assessment of biodiversity gain sites for any local authority led BNG scheme.*
- *Advice on embedding BNG and natural environment aspects more generally into wider Council strategies and objectives."*

At present Moray Council do not have any staff within the Development Management (DM) team with natural environment and ecological expertise.

Over the last three years (2020 - 2022) Moray Council have received between 7 and 18 applications for Major developments and 0 to 3 applications relating to National developments[29]. If the number of applications remains similar in future years this means that there will be an average of 15 planning applications a year which will be required to utilise a biodiversity metric to demonstrate compliance with NPF4 Policy 3b.

In order for Moray Council to adequately assess applications using a biodiversity metric tool, additional resources will be required. In order to properly evaluate metric calculation in terms of adherence to NPF4 or BNG Principles for Development[30] it is considered that there are three approaches which could be utilised:

[29] Note: Local developments requiring EIA will also be required to utilise a biodiversity metric but numbers on these are not available. It is assumed numbers are limited though by nature of the scale of the developments.

[30] CIEEM, CIRA, IEMA (2016) Biodiversity Net Gain: Good Practice Principles for Development. Available at: https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/ (Accessed 2/10/2023)

- Upskill existing staff through training.
- Recruitment of additional staff with suitable qualifications/knowledge base.
- Outsource assessment of BNG metric elements to a suitably qualified and experienced third party.

The associated benefits and risks of these approaches is presented in table 4-1 below, along with anticipated costs in terms of time and finance.

Table 4-1: Analysis of approaches to implementing BNG metric tool

Approach	Benefit	Risk	Cost
Upskill existing staff	No additional recruitment costs. Staff already familiar with Moray Council processes.	Do not meet the required skills set out by PAS. Lack of capacity to take on additional tasks. Course availability/places are limited. Difficult for staff without ecological background to assess appropriateness of measures set out in enhancement plans, especially in more complex sites, or where bespoke plans are needed for higher value or '*irreplaceable habitats'*. If planning decisions relating to BNG are challenged it will be difficult to defend assessments made by staff who lack knowledge of underlying ecological principals.	CIEEM offer a variety of courses suitable for planners, relating to the BNG metric and the underlying principles. The selection of courses listed at the time of writing is given below. It is anticipated that staff may need to complete more than one course: • Biodiversity Metric v4: 9hrs £240[31] • Designing for Biodiversity Net Gain: 6hrs £220. If multiple members of staff are to be trained, it may be more cost effective to commission in house training. Costs would be dependent on provider.
Recruitment of additional staff (an Ecologist or an Environmental Planner with Ecological background)	Meets the required skills set out by the PAS and thus advise is more likely to be defendable if a decision is challenged. Better integration and communication with the rest of the Development Management team (than outsourcing).	Expected caseload of 15 BNG developments a year is unlikely to sustain full time role. Budget savings are required and so securing funding for additional posts may be challenging.	Assuming full time role the base pay range for Environmental Planners range from £27-44k a year with an average salary of £35k[32]. Within Moray Council the role would likely sit within grades 8-9 equating to £31,762 - £41,923 per annum.

[31] Assuming as staff are not from ecology backgrounds that they are not CIEEM members.
[32] Figures available at Glassdoor.co.uk https://www.glassdoor.co.uk/Salaries/environmental-planner-salary-SRCH_KO0,21.htm (Accessed 02/20/2023)

	Greater control over timing of outputs/responses. Can provide valuable input to other aspects of Development Management. Can contribute to other areas of council work such as climate change strategy, nature restoration projects, development of nature networks, open space management, woodland strategy, just transition strategy.		
Outsource assessment of BNG metric	Cost savings on recruitment and providing ongoing training and benefits. Advise from suitably qualified consultant would be defendable if decisions are challenged.	Reduced control over outputs and timing. Lack of access to internal systems. Depending on demand it may cost more in the longer term as consultant hourly rates are likely to be higher than hourly staff wage equivalent. There are capacity issues within the ecological sector[33] and availability of consultants to provide regular and timely input may be limited.	Hourly rates for ecological consultants can be variable depending on level of expertise and experience but would be in the range of £35-100 per hour. According to Aberdeenshire Council estimates it could take a couple of hours to several days depending on the complexity of the application. Based on the above hourly estimates that could be anywhere from <£100 – several thousand.

[33] CIEEM (2022) Briefing document on the current capacity crisis and the need to provide supports to the professional ecological sector. Available at: https://cieem.net/wp-content/uploads/2022/08/Current-capacity-crisis-in-the-ecological-sector-CIEEM-Breifing-Paper-Final-1.pdf (Accessed 02/10/2023)

		Internal guidance may need to be developed to set out how external advice is dealt with in decisions if it doesn't exist already eg if an external consultant concludes than a development doesn't meet the policy requirements.	Consultants would also be required to add on additional time to cover internal project management processes.

Whilst the focus of this study was resources required to implement use of a biodiversity metric tool, it should be noted that Local developments still required some level of biodiversity plan or statement to be included within the planning application (as per NPF4 Policy 3c) and these also need to be assessed for appropriateness. This assessment is also best done by someone with ecological knowledge and expertise. An Ecologist or Environmental Planner with an ecological background will also be able to contribute to the drafting of policy and supporting guidance relating to biodiversity (particularly where gaps have been noted in section 3.1). The council also has responsibility for delivery and implementation of a number of other projects and strategies which require ecological input such as climate change strategy, nature restoration projects, development of nature networks, open space management, woodland strategy, just transition strategy.

The average number of Local development planning applications over the three year period from 2020-2022 was 696. Covering a slightly different time period (July 2021 – July 2023) Moray Council recorded the following planning applications that involve 'biodiversity' considerations:

- Developments over 10 housing units that require a biodiversity plan = 24
- Developments that have considered peat, carbon rich soils, prime agricultural land = 41
- Developments that have considered protected sites = 200
- Developments that have considered protected species = 204
- Developments that have considered the loss of trees = 190
- Developments that have considered the loss of ancient woodland = 110

At present the majority of the applications involving ecological survey and biodiversity improvement plans are dealt with by the existing DM team, with NatureScot providing input in line with their standing advice and guidance. If an Ecologist or Environmental planner were to provide input to these aspects of DM, it would likely be sufficient to justify a full-time position. It is however recognised that with budget reduction measures required going forward, any new ecologist role is likely to have a wider remit outside of Development Management. The wider DM team could assess less complex cases in relation to compliance with NPF4 biodiversity policies, with more complex cases passed to an ecologist. An internal framework or guidance for deciding which cases are to be assessed by a specialist and which could be assessed by a general planner would be required for transparency and to ensure cases are not undervalued by non-specialists. If this model was to be implemented, the whole DM team would require upskilling in relation to biodiversity to ensure robust assessment of plans in relation to NPF4 policies.

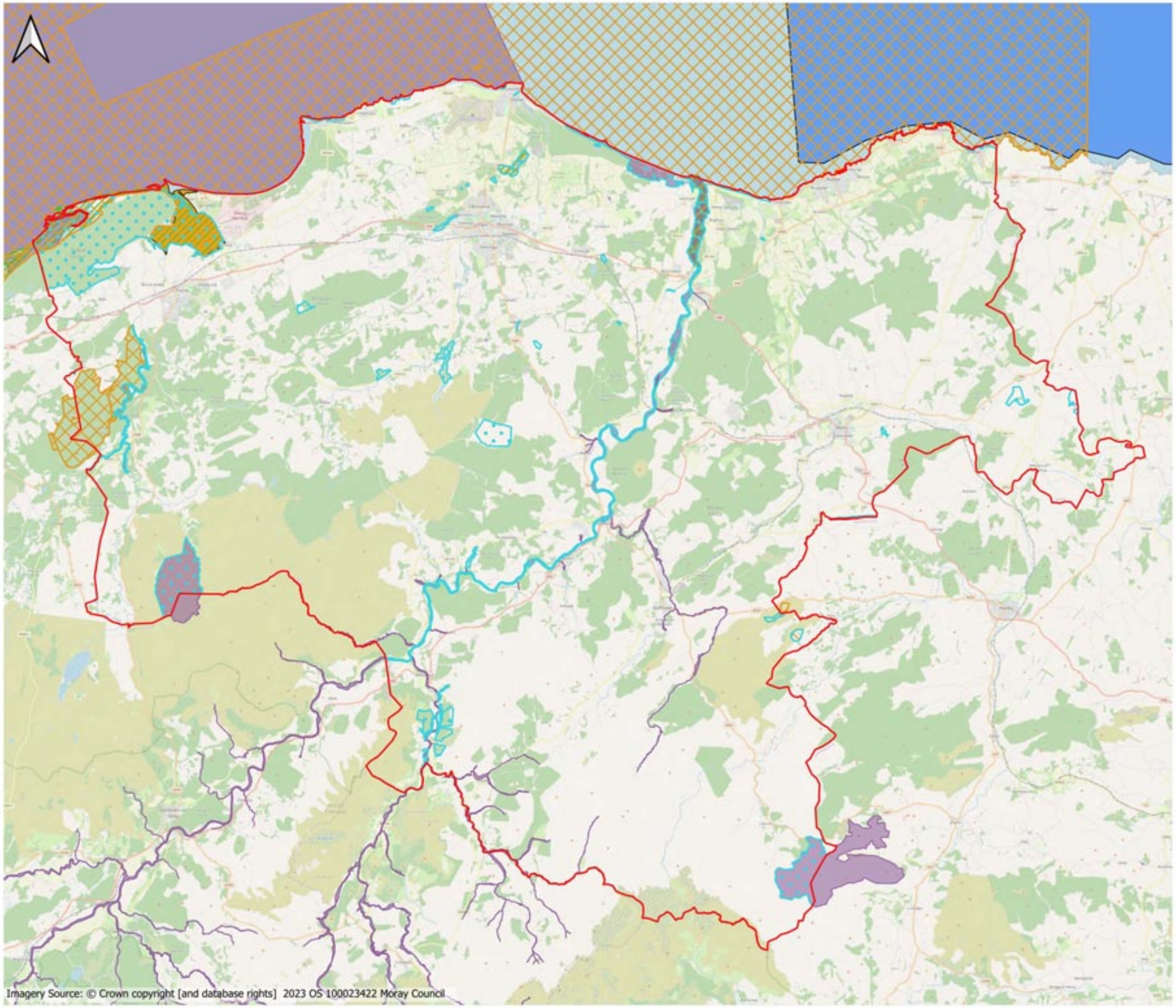
A**PPENDICES**

A DESK STUDY CONSULTATION SUMMARY

Organisation	Information Available/Received
NatureScot	Open access data layers utilised as required. Staff indicated that more detailed information relating to protected areas was available if required. For the purpose of the study it was not felt this was necessary.
Royal Society for the Protection of Birds	Provided shape files for lowland peatland sites in Moray surveyed as part of the North East Scotland Wetland Inventory (2007) project to identify sites with potential for restoration, expansion or creation. Sites were re-surveyed in 2021 but report not available at the time of consultation. Report on Important Areas for Breeding Farmland Waders in North East Scotland also received.
Scottish Wildlife Trust	Records are all submitted to the National Biological Network (NBN) and can be viewed there. Given the large number of records received from NESBReC it wasn't felt that an additional NBN records would add significantly to the desk study.
Forestry Land Scotland	No response received.
Scottish Forestry	Meeting held with discussion more generally in terms of biodiversity value of woodland sites and potential to contribute to Nature Networks. Highlighted areas in the wider landscape receiving forestry creation and management grants as being of potential value to biodiversity. It was also discussed that there were other grants such as Agri-environment schemes under which tree planting and other habitat enhancements can be secured. Open source data was highlighted as main source of usable data for the desk study.
Woodland Trust	No response received.
North East Biodiversity Partnership	At the time of contact there was no full time co-ordinator in place to provide comment. Main information useful to the desk study available on the website.
Birds in Moray and Nairn	No response received.
Botanical Society of the British Isles	Vice County Recorder submits records to NESBReC regularly. There may be some records not with them. Coral Root Orchid records were provided. Further records were not received, presumably due to lack of volunteer time.
Spey Fisheries Board	Large amount of data held on salmon and other fish species within the catchment, as well as some invertebrates. It was felt that for the purposes of the study the level of detail in data would not add much to the analysis due to the Spey already being highlighted as an important feature for biodiversity within Moray. Spey Catchment Initiative highlighted with possible connections to the project.

Findhorn Watershed Initiative	Directed us to Findhorn, Nairn and Lossie Rivers Trust for any actual data. Potential cross over with the Watershed Initiative and Nature Networks development in future phases of the project.
Scottish Invasive Species Initiative	Offered to provide information relating to giant hogweed, Japanese knotweed and Himalayan balsam and American mink. As the NESBReC records contained many of these species already the additional data wasn't requested. This data may be useful in the future development of biodiversity strategies within the area however.
Cairngorm Nature	No response received.
Huntly Swift Group	No response received.
Saving Scotland's Red Squirrels	All records shared with NESBReC annually.
Highlands Butterfly Conservation	All records shared with NESBReC regularly.
Buglife Scotland	Shapefiles and data relating to Important Insect Areas within Moray provided

B DESK STUDY RESULTS PLANS



Legend

- Moray LDP Boundary

Designated Sites

- LNR
- MPA
- SSSI
- SPA
- RAMSAR
- SAC

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Designated Sites Plan

Status
FINAL

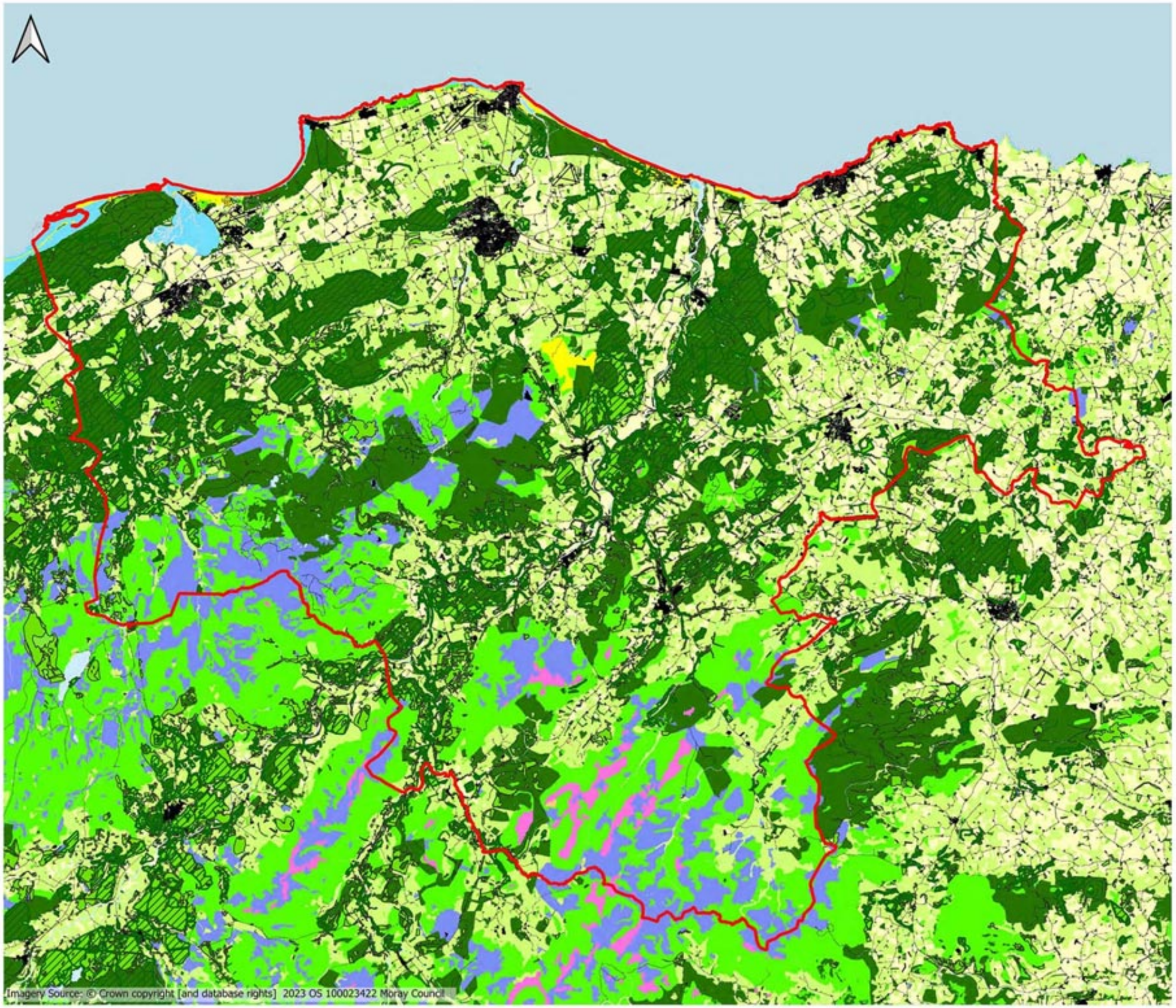
Drawing No.	Revision	Date
378201-GIS022	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3

0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

Moray LDP Boundary

HabMoS EUNIS Base layer

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Habitat Map of Scotland Plan

Status
FINAL

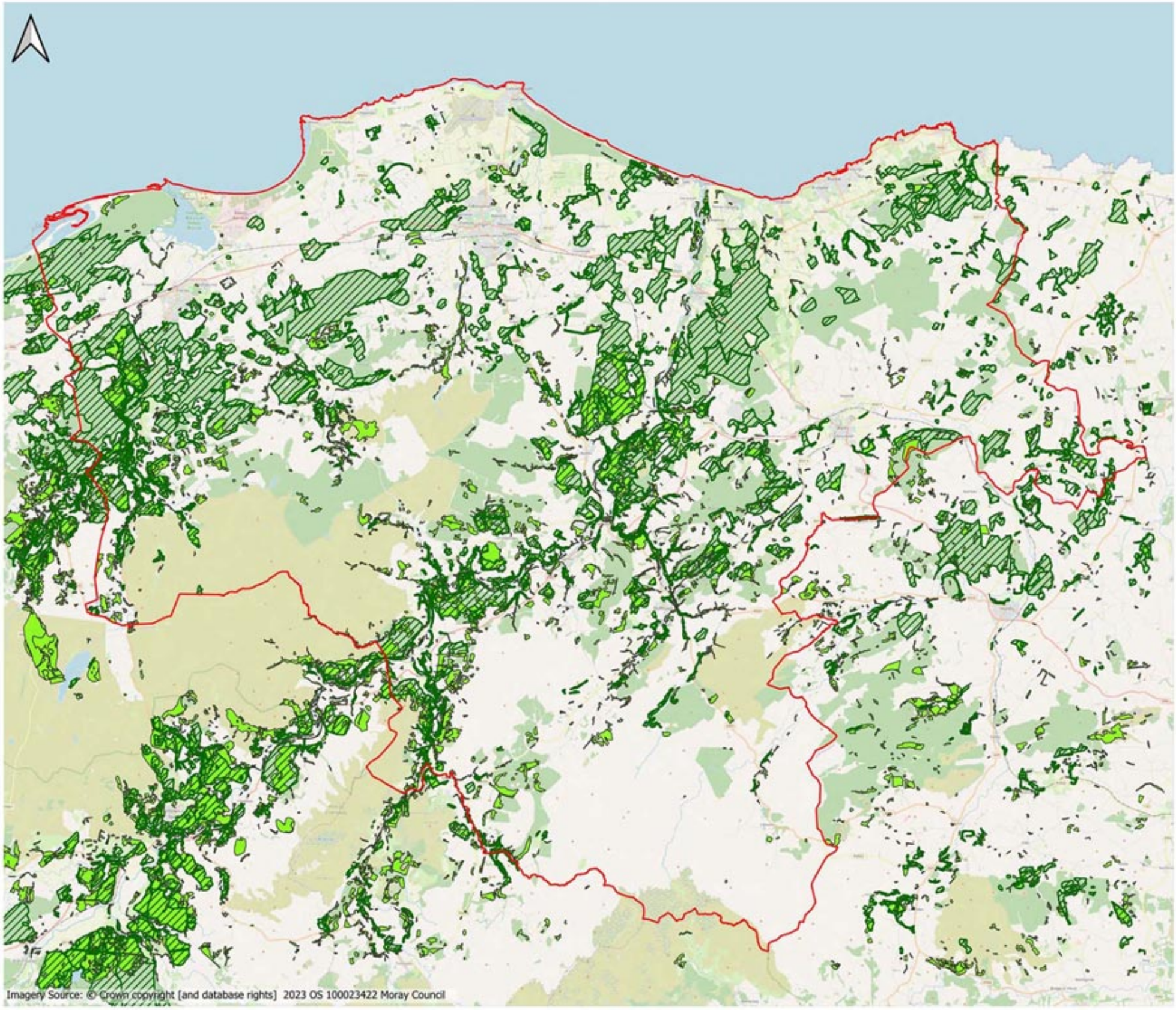
Drawing No.	Revision	Date
378201-GIS030	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3

0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

- Moray LDP Boundary
- Ancient Woodland
- Native Woodland

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Ancient and Native Woodland Plan

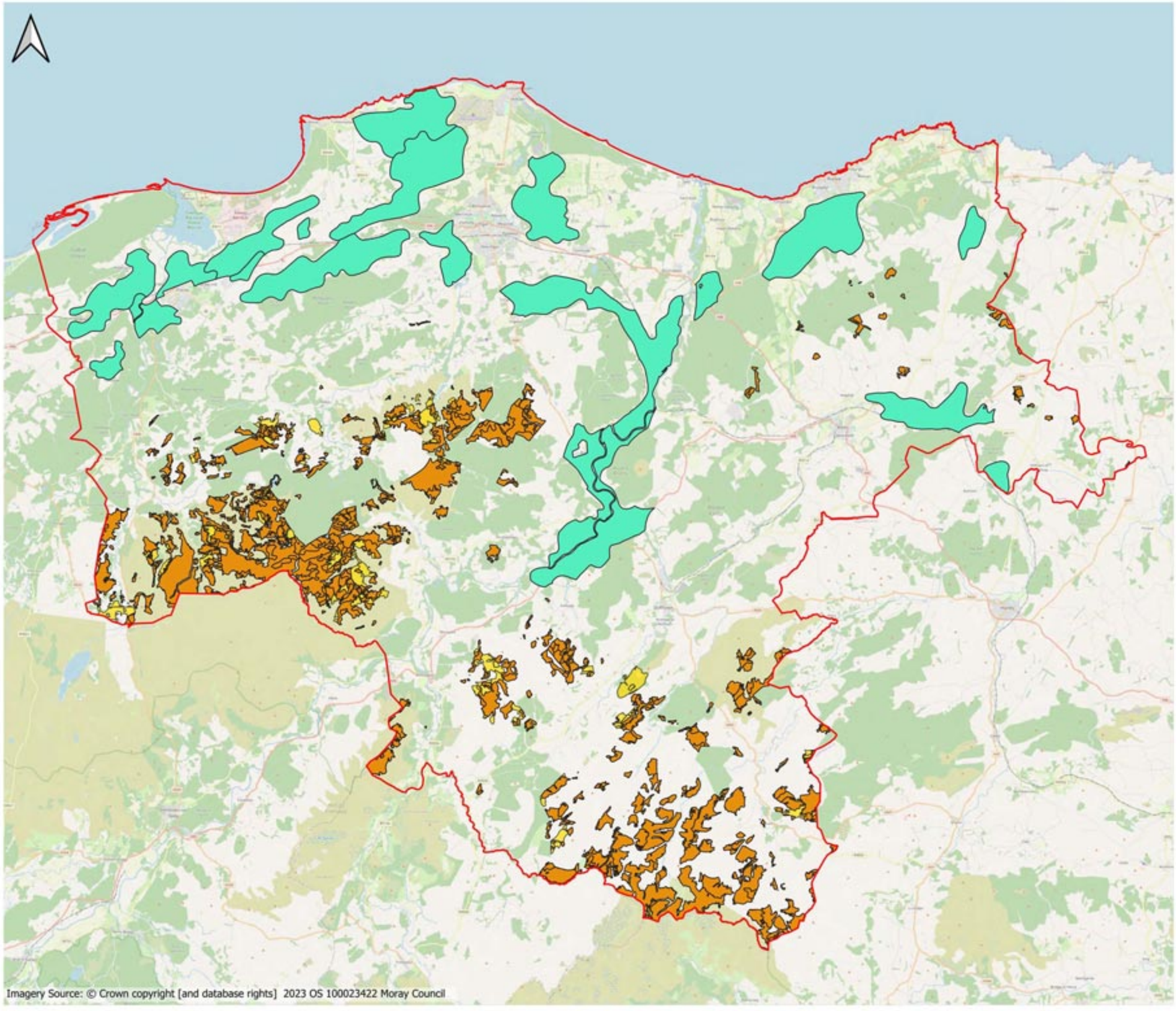
Status
FINAL

Drawing No.	Revision	Date
378201-GIS028	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3
0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

- Moray LDP Boundary
- Class 1 Peatland
- Class 2 Peatland
- Prime Agricultural Land

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Soils Plan

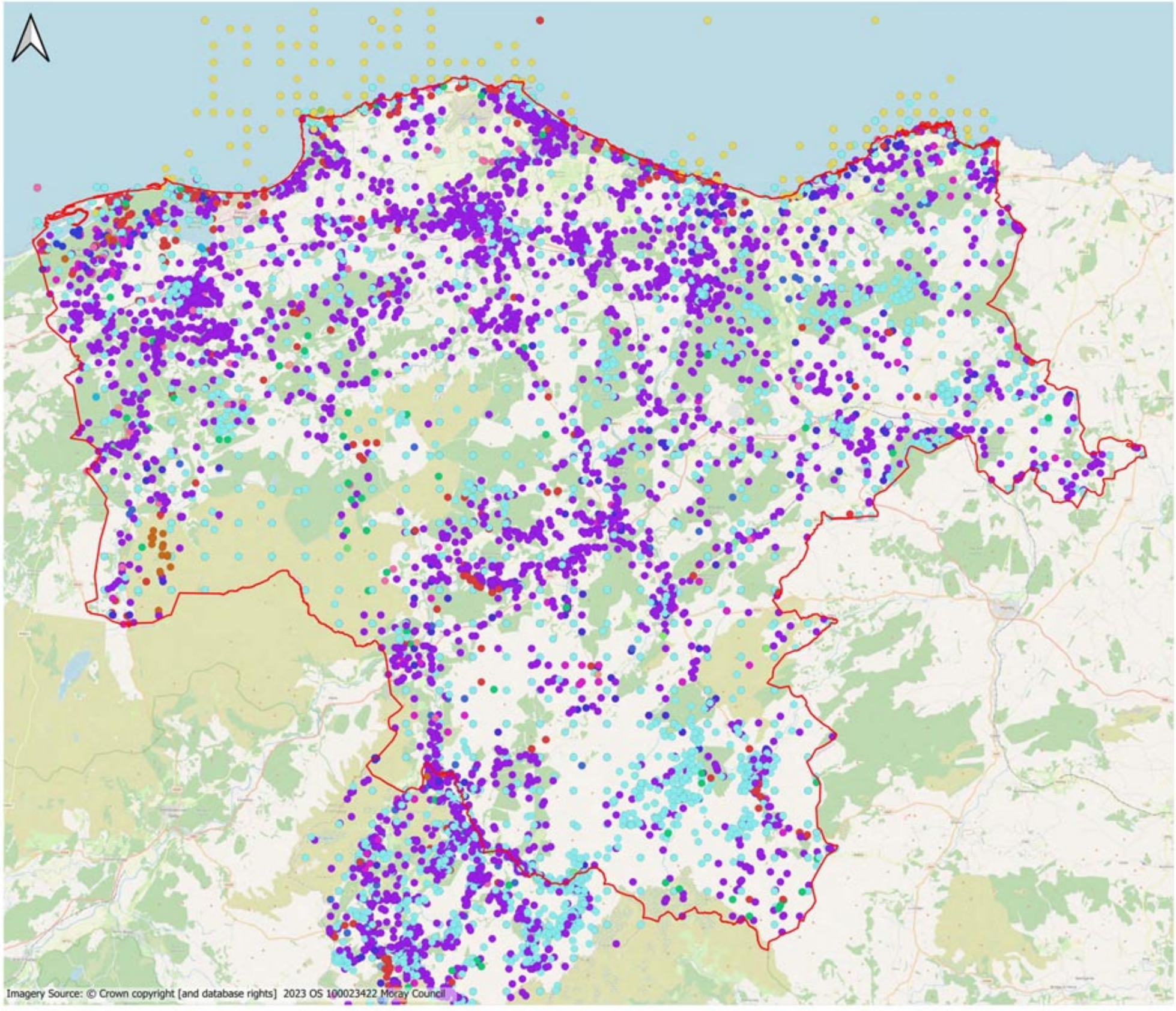
Status
FINAL

Drawing No.	Revision	Date
378201-GIS029	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3
0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

- Moray LDP Boundary
- amphibian
- bird
- bony fish
- cartilagenous fish
- clubmoss
- conifer
- fern
- flowering plant
- fungus
- insect - beetle
- insect - butterfly
- insect - hymenopteran
- insect - moth
- insect - stonefly
- insect - true fly
- lichen
- liverwort
- marine mammal
- mollusc
- moss
- reptile
- slime mould
- spider
- stonewort
- terrestrial mammal

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Moray Designated Species Plan

Status
FINAL

Drawing No.	Revision	Date
378201-GIS023	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3
0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk

Legend

- Moray LDP Boundary
- clubmoss
- fern
- flowering plant
- fungus
- horsetail
- insect - moth
- quillwort
- terrestrial mammal

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Locally Important Species Plan

Status
FINAL

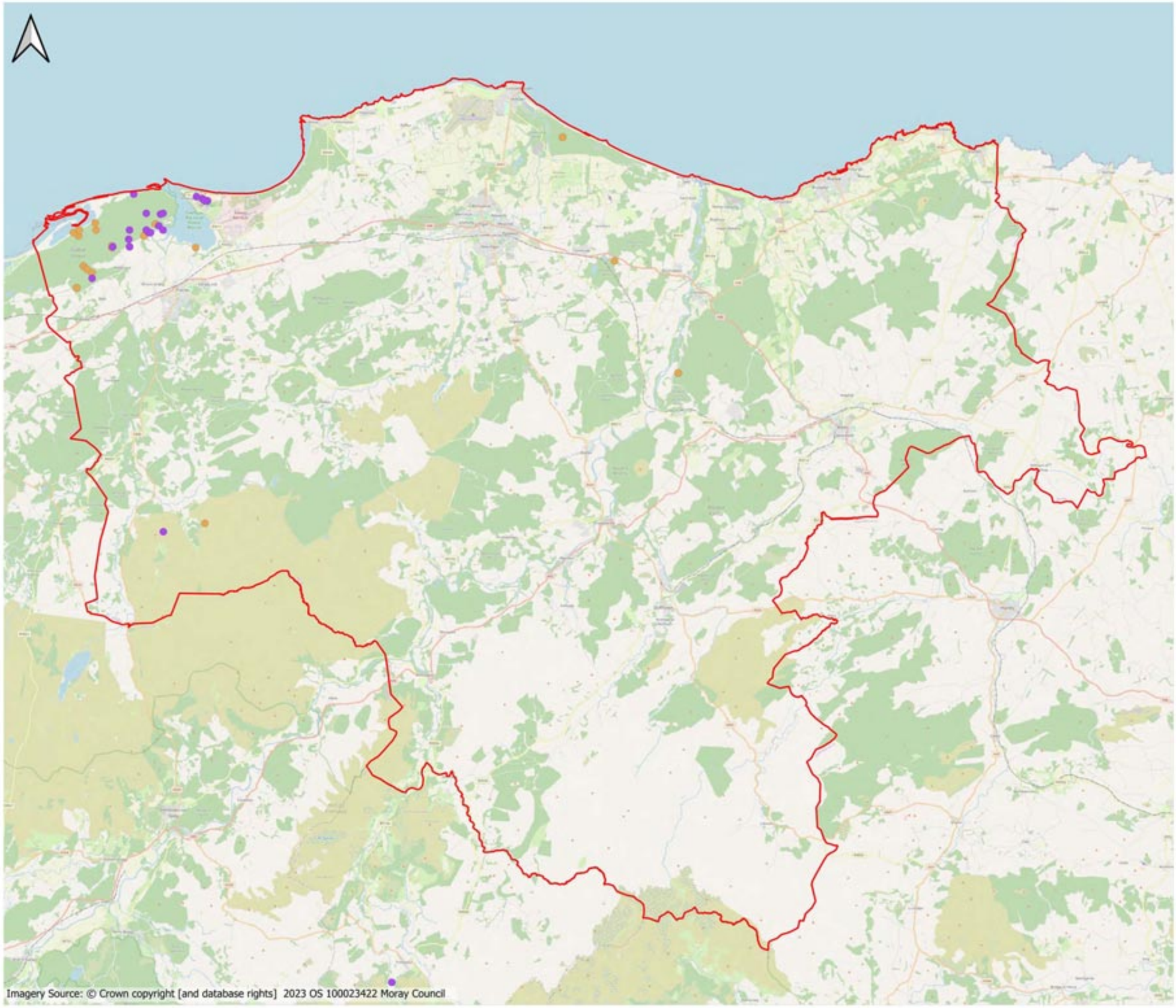
Drawing No.	Revision	Date
378201-GIS024	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3

0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

- Moray LDP Boundary
- Hairy Wood Ant
- Scottish Wood Ant

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Cairngorms Priority Species Plan

Status
FINAL

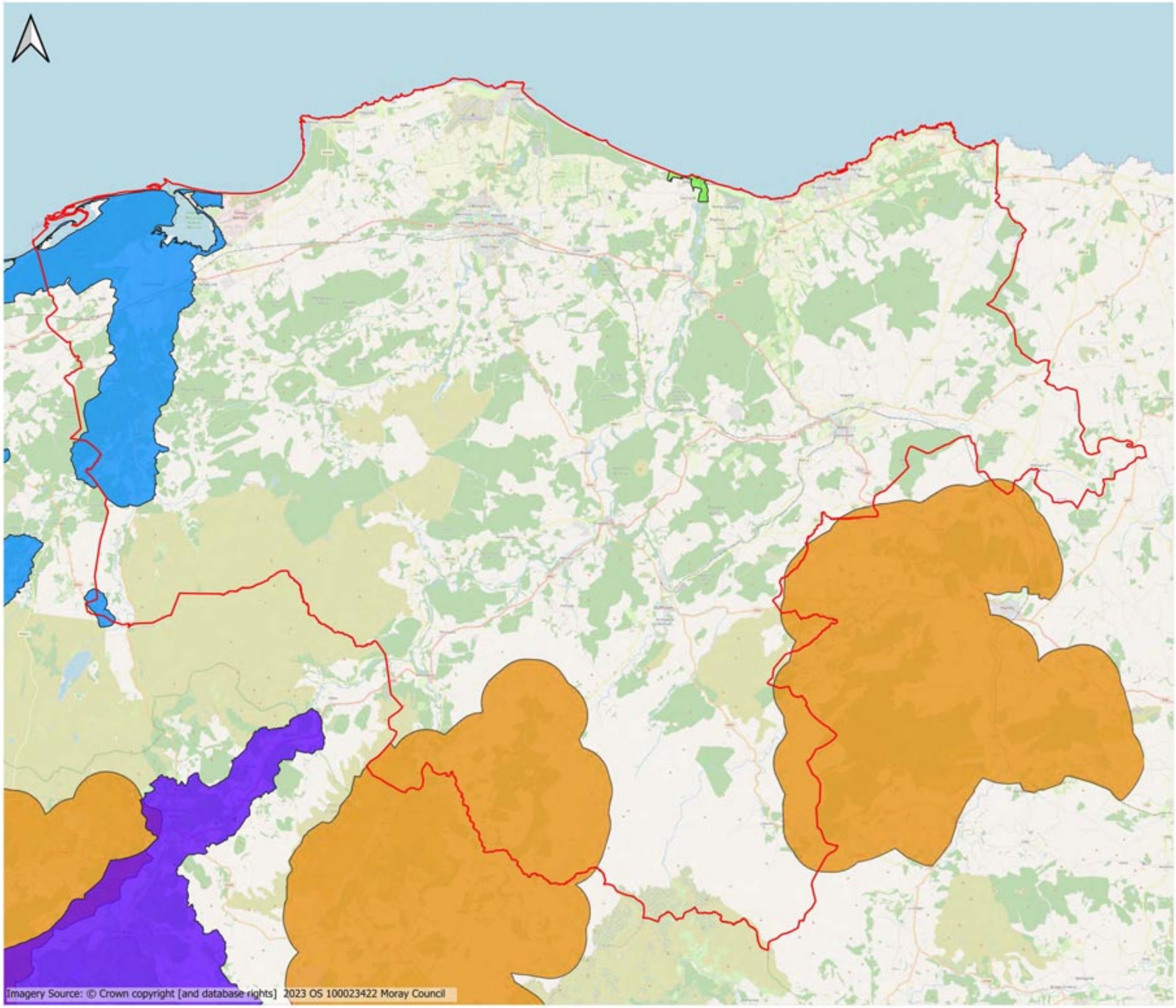
Drawing No.	Revision	Date
378201-GIS025	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3

0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

- Moray LDP Boundary
- Strathspey IIA
- Findhorn Culbin IIA
- Scottish Wildlife Trust Reserves
- Wildcat Priority Areas

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Other Important Areas for Species

Status
FINAL

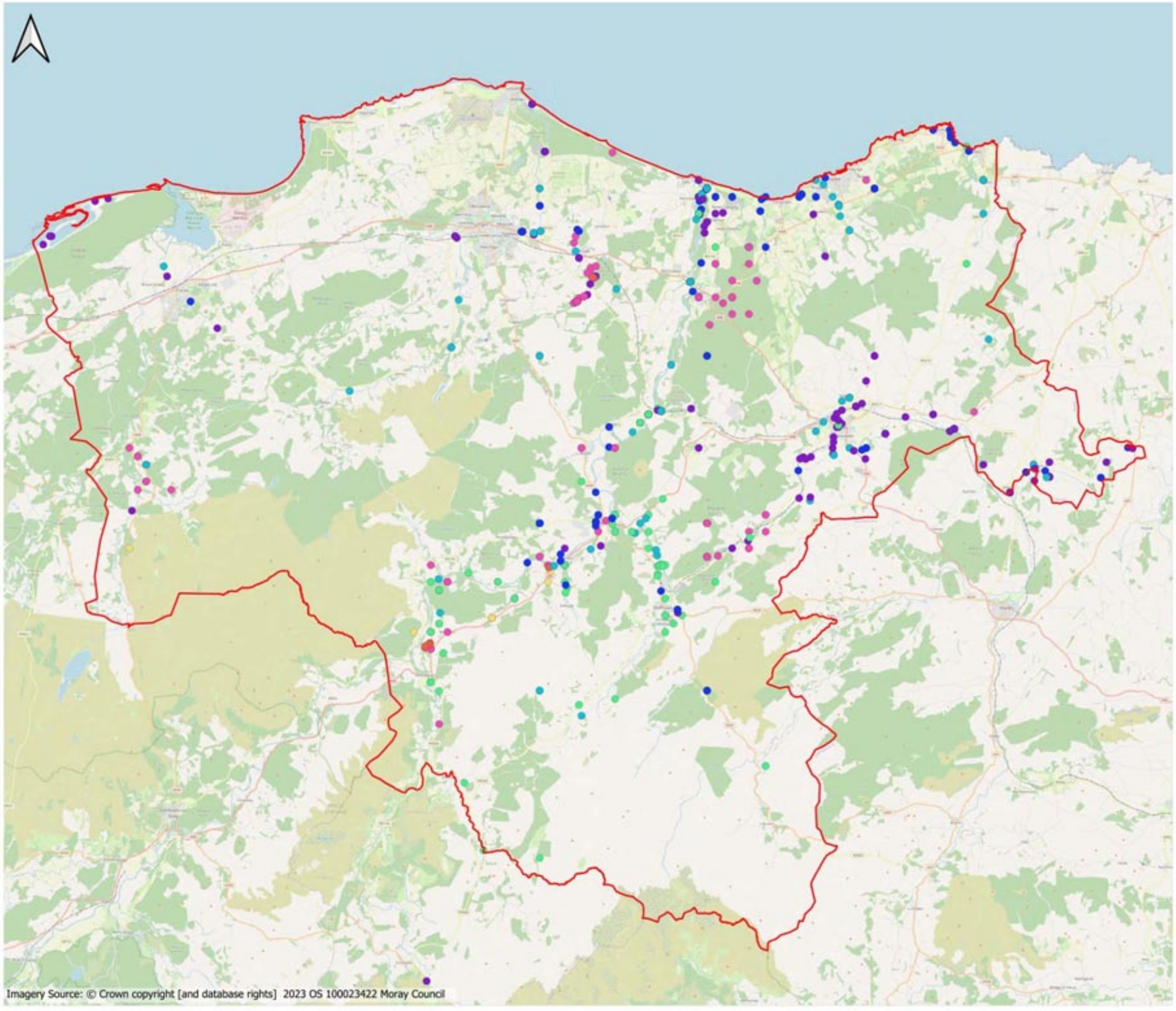
Drawing No.	Revision	Date
378201-GIS027	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3

0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk



Legend

- Moray LDP Boundary
- American Skunk-cabbage
- Giant Hogweed
- Himalayan Balsam
- Himalayan Knotweed
- Japanese Knotweed
- Rhododendron
- White Butterbur

Do not scale this map

Client
Moray Council

Project
Moray Council Biodiversity Study

Title
Invasive Non-Native Species Plan

Status
FINAL

Drawing No.	Revision	Date
378201-GIS026	A	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	GN

Scale
1:220,000 @ A3

0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk

C SUMMARY OF NESBREC RECORDS

Designated Species – Internationally and Nationally Important			
Species	**Taxon Group**	**No of Records**	**Conservation Importance[34]**
Adder (Vipera berus)	reptile	23	Wildlife and Countryside Act 1981 (WCA) - Schedule 5
Alpine Bearberry (Arctostaphylos alpinus)	flowering plant	7	Classified as Nationally Scarce on Vascular Plant Red List
Alpine Copper-moss (Mielichhoferia mielichhoferiana)	moss	1	WCA Schedule 8
Alpine Fleabane (Erigeron borealis)	flowering plant	1	WCA Schedule 8
Alpine Pearlwort (Sagina saginoides)	flowering plant	4	Scottish Biodiversity List (SBL)
Ambiguous Thyme-moss (Mnium ambiguum)	moss	1	SBL
Anagallis arvensis (Anagallis arvensis)	flowering plant	5	SBL
Anise Mazegill (Gloeophyllum odoratum)	fungus	2	SBL
Annual Knawel (Scleranthus annuus subsp. annuus)	flowering plant	21	SBL
Anomalous (Stilbia anomala)	insect - moth	14	SBL
Arctic Brook-moss (Hygrohypnum smithii)	moss	1	SBL
Arctic Charr (Salvelinus alpinus)	bony fish (Actinopterygii)	1	SBL
Arctic Flapwort (Jungermannia polaris)	liverwort	1	SBL
Arctic Mouse-Ear (Cerastium arcticum)	flowering plant	39	SBL
Arctic Rustwort (Marsupella arctica)	liverwort	1	SBL
Arctic Skua (Stercorarius parasiticus)	bird	2	Birds of Conservation Concern (BOCC) Red list
Arctic Tern (Sterna paradisaea)	bird	21	BoCC Amber list
Atlantic Salmon (Salmo salar)	bony fish (Actinopterygii)	5	European Protected Species (EPS)
Atlantic White-sided Dolphin (Lagenorhynchus acutus)	marine mammal	1	EPS
Autumnal Rustic (Eugnorisma glareosa)	insect - moth	70	SBL
Barn Owl (Tyto alba)	bird	141	WCA Schedule 1
Barnacle Goose (Branta leucopsis)	bird	2	BoCC Amber list
Bar-tailed Godwit (Limosa lapponica)	bird	4	BoCC Amber

[34] Many species have more than one designation eg protection under legislation and Scottish Biodiversity List Priority species. Only the highest level of protection is shown in the table.

Basking Shark (Cetorhinus maximus)	cartilagenous fish (Chondrichthyes)	1	WCA Schedule 5
Bats (Chiroptera)	terrestrial mammal	35	EPS
Bearded Tit (Panurus biarmicus)	bird	1	WCA Schedule 1
Bend-bearing Blunt-brow Spider (Silometopus incurvatus)	spider (Araneae)	4	SBL
Bendy Ditrichum (Ditrichum flexicaule)	moss	7	SBL
Black Grimmia (Grimmia incurva)	moss	1	SBL
Black Grouse (Tetrao tetrix)	bird	209	BoCC Red
Black Tooth (Phellodon niger)	fungus	4	SBL
Black-bindweed (Fallopia convolvulus)	flowering plant	58	SBL
Black-grass (Alopecurus myosuroides)	flowering plant	5	SBL
Black-headed Gull (Chroicocephalus ridibundus)	bird	222	SBL
Black-tailed Godwit (Limosa limosa)	bird	2	WCA Schedule 1
Black-throated Diver (Gavia arctica)	bird	6	WCA Schedule 1
Blue Tooth (Hydnellum caeruleum)	fungus	7	SBL
Blue Whale (Balaenoptera musculus)	marine mammal	1	EPS
Blue-black Soil Slug (Arion (Kobeltia) hortensis)	mollusc	1	SBL
Blunt-leaved Bristle-moss (Orthotrichum obtusifolium)	moss	2	WCA Schedule 8
Blushing Bryum (Bryum elegans)	moss	2	SBL
Blytt's Rock-moss (Andreaea blyttii)	moss	5	SBL
Boeck's Rustwort (Marsupella boeckii)	liverwort	1	SBL
Bog Pawwort (Barbilophozia kunzeana)	liverwort	1	SBL
Book Flapwort (Nardia breidleri)	liverwort	2	SBL
Bottle-Nosed Dolphin (Tursiops truncatus)	marine mammal	200	EPS
Brambling (Fringilla montifringilla)	bird	22	WCA Schedule 1
Brent Goose (Branta bernicla)	bird	3	BoCC Amber
Brindled Beauty (Lycia hirtaria)	insect - moth	7	SBL
Brindled Ochre (Dasypolia templi)	insect - moth	21	SBL
Brittle Crisp-moss (Tortella fragilis)	moss	2	SBL
Broom Moth (Ceramica pisi)	insect - moth	27	SBL
Broom-tip (Chesias rufata)	insect - moth	4	SBL
Brown Hare (Lepus europaeus)	terrestrial mammal	480	SBL
Brown Long-eared Bat (Plecotus auritus)	terrestrial mammal	55	EPS
Brown/Sea Trout (Salmo trutta)	bony fish (Actinopterygii)	8	SBL
Brown-spot Pinion (Agrochola litura)	insect - moth	79	SBL
Bullfinch (Pyrrhula pyrrhula)	bird	292	SBL
Bumblebee Robberfly (Laphria flava)	insect - true fly (Diptera)	1	SBL
Canada Goose (Branta canadensis)	bird	3	
Capercaillie (Tetrao urogallus)	bird	68	WCA Schedule 1

Caraway (Carum carvi)	flowering plant	25	SBL
Centre-barred Sallow (Atethmia centrago)	insect - moth	6	SBL
Cernuous Thread-moss (Bryum uliginosum)	moss	1	SBL
Charlock (Sinapis arvensis)	flowering plant	88	SBL
Chicory (Cichorium intybus)	flowering plant	6	SBL
Ciliate Earwort (Scapania praetervisa)	liverwort	2	SBL
Cirl Bunting (Emberiza cirlus)	bird	3	SBL
Cleft Bog-moss (Sphagnum riparium)	moss	2	SBL
Collema fasciculare (Collema fasciculare)	lichen	2	SBL
Common Cudweed (Filago vulgaris)	flowering plant	2	SBL
Common Dolphin (Delphinus delphis)	marine mammal	4	EPS
Common Gromwell (Lithospermum officinale)	flowering plant	1	SBL
Common Lizard (Zootoca vivipara)	reptile	96	SBL
Common Pipistrelle (Pipistrellus pipistrellus)	terrestrial mammal	189	EPS
Common Porpoise (Phocoena phocoena)	marine mammal	89	EPS
Common Scoter (Melanitta nigra)	bird	11	WCA Schedule 1
Common Seal (Phoca vitulina)	marine mammal	168	EPS
Common Tern (Sterna hirundo)	bird	36	SBL
Common Toad (Bufo bufo)	amphibian	108	SBL
Compact Rustwort (Marsupella condensata)	liverwort	1	SBL
Coral Frostwort (Gymnomitrion corallioides)	liverwort	1	SBL
Corn Bunting (Emberiza calandra)	bird	45	SBL
Corn Cleavers (Galium tricornutum)	flowering plant	4	Vascular Plant Red List Nationally Rare
Corn Mint (Mentha arvensis)	flowering plant	20	SBL
Cornflower (Centaurea cyanus)	flowering plant	11	SBL
Cortinarius laniger (Cortinarius laniger)	fungus	8	SBL
Cortinarius porphyropus (Cortinarius porphyropus)	fungus	1	SBL
Cousin German (Protolampra sobrina)	insect - moth	11	SBL
Cuckoo (Cuculus canorus)	bird	309	SBL
Curled Notchwort (Anastrophyllum saxicola)	liverwort	2	SBL
Curlew (Numenius arquata)	bird	531	SBL
Curved Sedge (Carex maritima)	flowering plant	3	SBL
Curved Wood-rush (Luzula arcuata)	flowering plant	56	SBL
Cyphel (Minuartia sedoides)	flowering plant	3	SBL
Dark Brocade (Mniotype adusta)	insect - moth	41	SBL
Dark Spinach (Pelurga comitata)	insect - moth	1	SBL

Dark-red Helleborine (Epipactis atrorubens)	flowering plant	22	SBL
Daubenton's Bat (Myotis daubentonii)	terrestrial mammal	41	EPS
Delicate Dog-tooth (Cynodontium tenellum)	moss	1	SBL
Devil's Tooth (Hydnellum peckii)	fungus	65	SBL
Dickie's Bladder-fern (Cystopteris dickieana)	fern	4	WCA Schedule 8
Dictyna major (Dictyna major)	spider (Araneae)	1	SBL
Dingy Skipper (Erynnis tages)	insect - butterfly	181	SBL
Dotterel (Charadrius morinellus)	bird	27	WCA Schedule 1
Double Dart (Graphiphora augur)	insect - moth	15	SBL
Downy Willow (Salix lapponum)	flowering plant	3	SBL
Drab Tooth (Bankera fuligineoalba)	fungus	8	SBL
Dunlin (Calidris alpina)	bird	33	SBL
Dunnock (Prunella modularis)	bird	438	SBL
Dusky Brocade (Apamea remissa)	insect - moth	51	SBL
Dwarf Elder (Sambucus ebulus)	flowering plant	1	SBL
Ear Moth (Amphipoea oculea)	insect - moth	4	SBL
Eider (Somateria mollissima)	bird	42	BoCC Amber
Eurasian Badger (Meles meles)	terrestrial mammal	433	Protection of Badger Act 1992
Eurasian Red Squirrel (Sciurus vulgaris)	terrestrial mammal	2552	WCA Schedules 5&6
European Eel (Anguilla anguilla)	bony fish (Actinopterygii)	3	SBL
European Otter (Lutra lutra)	terrestrial mammal	329	EPS
European Water Vole (Arvicola amphibius)	terrestrial mammal	116	WCA Schedules 5&6
Field Garlic (Allium oleraceum)	flowering plant	5	SBL
Field Gentian (Gentianella campestris)	flowering plant	84	SBL
Field Madder (Sherardia arvensis)	flowering plant	12	SBL
Field Pepperwort (Lepidium campestre)	flowering plant	1	SBL
Field Woundwort (Stachys arvensis)	flowering plant	19	SBL
Floppy Earwort (Scapania paludosa)	liverwort	1	SBL
Four-fingered Pawwort (Barbilophozia quadriloba)	liverwort	1	SBL
Fringed Hoar-moss (Hedwigia ciliata)	moss	3	SBL
Frog Orchid (Coeloglossum viride)	flowering plant	37	SBL
Fuzzy Fork-moss (Dicranum leioneuron)	moss	1	SBL
Galerina harrisonii (Galerina harrisonii)	fungus	1	SBL
Galium Carpet (Epirrhoe galiata)	insect - moth	5	SBL
Garden Dart (Euxoa nigricans)	insect - moth	5	SBL
Garden Tiger (Arctia caja)	insect - moth	85	SBL
Garganey (Anas querquedula)	bird	2	WCA Schedule 1
Ghost Moth (Hepialus humuli)	insect - moth	31	SBL

Ghostwort (Cryptothallus mirabilis)	liverwort	1	SBL
Gillman's Notchwort (Leiocolea gillmanii)	liverwort	1	SBL
Glaucous Meadow-grass (Poa glauca)	flowering plant	7	SBL
Goat Moth (Cossus cossus)	insect - moth	3	SBL
Golden Eagle (Aquila chrysaetos)	bird	54	WCA Schedule 1, 1A & A1
Golden Plover (Pluvialis apricaria)	bird	159	SBL
Golden Scottish Stiletto (Thereva handlirschi)	insect - true fly (Diptera)	4	SBL
Goldeneye (Bucephala clangula)	bird	16	BoCC Red List
Good-King-Henry (Chenopodium bonus-henricus)	flowering plant	19	SBL
Goshawk (Accipiter gentilis)	bird	87	WCA Schedule 1
Grape-hyacinth (Muscari neglectum)	flowering plant	1	SBL
Grass Rivulet (Perizoma albulata)	insect - moth	12	SBL
Grasshopper Warbler (Locustella naevia)	bird	50	SBL
Grayling (Hipparchia semele)	insect - butterfly	167	SBL
Great Crested Newt (Triturus cristatus)	amphibian	10	SBL
Great Northern Diver (Gavia immer)	bird	2	WCA Schedule 1
Greater Celandine (Chelidonium majus)	flowering plant	8	SBL
Green Sandpiper (Tringa ochropus)	bird	2	WCA Schedule 1
Green Shield-moss (Buxbaumia viridis)	moss	2	WCA Schedule 8
Green-brindled Crescent (Allophyes oxyacanthae)	insect - moth	17	SBL
Grey Dagger (Acronicta psi)	insect - moth	23	SBL
Grey Hair-grass (Corynephorus canescens)	flowering plant	2	Vascular Plant Red List Nationally Rare
Grey Mountain Carpet (Entephria caesiata)	insect - moth	46	SBL
Grey Partridge (Perdix perdix)	bird	131	SBL
Grey Tooth (Phellodon melaleucus)	fungus	16	SBL
Greylag Goose (Anser anser)	bird	20	BoCC Amber List
Hairy Buttercup (Ranunculus sardous)	flowering plant	2	SBL
Hare's-foot Sedge (Carex lachenalii)	flowering plant	10	SBL
Harsh Downy-rose (Rosa tomentosa)	flowering plant	9	SBL
Hawfinch (Coccothraustes coccothraustes)	bird	1	SBL
Hawkweed (Hieracium graniticola)	flowering plant	3	SBL
Hawkweed (Hieracium grovesii)	flowering plant		SBL
Hawkweed Oxtongue (Picris hieracioides)	flowering plant	1	SBL
Haworth's Minor (Celaena haworthii)	insect - moth	13	SBL
Heath Cudweed (Gnaphalium sylvaticum)	flowering plant	86	SBL

Heath Rustic (Xestia agathina)	insect - moth	24	SBL
Hen Harrier (Circus cyaneus)	bird	69	WCA Schedule 1 & 1A
Henbane (Hyoscyamus niger)	flowering plant	2	SBL
Herring Gull (Larus argentatus)	bird	183	SBL
Highland Saxifrage (Saxifraga rivularis)	flowering plant	4	SBL
Hoary Plantain (Plantago media)	flowering plant	4	SBL
Hoary Whitlowgrass (Draba incana)	flowering plant	17	SBL
Hobby (Falco subbuteo)	bird	1	WCA Schedule 1
Holly-fern (Polystichum lonchitis)	fern	43	SBL
Honey-buzzard (Pernis apivorus)	bird	1	WCA Schedule 1
Hooded Crow (Corvus cornix)	bird	44	SBL
Hood-leaved Screw-moss (Stegonia latifolia)	moss	4	SBL
House Sparrow (Passer domesticus)	bird	348	SBL
Hygrocybe xanthochroa (Hygrocybe xanthochroa)	fungus	1	SBL
Icy Rock-moss (Andreaea frigida)	moss	4	SBL
Intermediate Wintergreen (Pyrola media)	flowering plant	35	SBL
Issler's Clubmoss (Diphasiastrum complanatum)	clubmoss	2	SBL
Jellied Bolete (Suillus flavidus)	fungus	17	
Joergensen's Notchwort (Anastrophyllum joergensenii)	liverwort	1	SBL
Juniper (Juniperus communis)	conifer	182	SBL
Kentish Glory (Endromis versicolora)	insect - moth	24	SBL
Kestrel (Falco tinnunculus)	bird	528	SBL
Kingfisher (Alcedo atthis)	bird	17	WCA Schedule 1
Knot Grass (Acronicta rumicis)	insect - moth	10	SBL
Lady's-Mantle (Alchemilla glaucescens)	flowering plant	2	SBL
Lamproderma carestiae (Lamproderma carestiae)	slime mould	1	SBL
Lamproderma cribrarioides (Lamproderma cribrarioides)	slime mould	2	SBL
Lamproderma sauteri (Lamproderma sauteri)	slime mould	3	SBL
Lapwing (Vanellus vanellus)	bird	532	SBL
Large Heath (Coenonympha tullia)	insect - butterfly	14	SBL
Large Wainscot (Rhizedra lutosa)	insect - moth	2	SBL
Large-flowered Hemp-nettle (Galeopsis speciosa)	flowering plant	25	SBL
Latticed Heath (Chiasmia clathrata)	insect - moth	1	SBL
Least Earwort (Scapania curta)	liverwort	1	SBL
Lesser Butterfly-orchid (Platanthera bifolia)	flowering plant	34	SBL
Lesser Curled Hook-moss (Palustriella decipiens)	moss	1	SBL

Lesser Redpoll (Acanthis cabaret)	bird	7	SBL
Linnet (Linaria cannabina)	bird	322	SBL
Little Tern (Sternula albifrons)	bird	7	WCA Schedule 1
Long-leaved Fork-moss (Paraleucobryum longifolium)	moss	2	SBL
Lunar Yellow Underwing (Noctua orbona)	insect - moth	14	SBL
Lungwort (Lobaria pulmonaria)	lichen	3	SBL
Many-seasoned Thread-moss (Bryum intermedium)	moss	1	SBL
Marsh Clubmoss (Lycopodiella inundata)	clubmoss	2	SBL
Marsh Fritillary (Euphydryas aurinia)	insect - butterfly	2	SBL
Marsh Harrier (Circus aeruginosus)	bird	2	WCA Schedule 1
Matt Felt Lichen (Peltigera malacea)	lichen	1	SBL
Merlin (Falco columbarius)	bird	54	WCA Schedule 1
Milk Thistle (Silybum marianum)	flowering plant	3	SBL
Minke Whale (Balaenoptera acutorostrata)	marine mammal	68	EPS
Minor Shoulder-knot (Brachylomia viminalis)	insect - moth	14	SBL
Moss Carder-bee (Bombus (Thoracobombus) muscorum)	insect - hymenopteran	6	SBL
Mossy Saxifrage (Saxifraga hypnoides)	flowering plant	13	SBL
Mottled Rustic (Caradrina morpheus)	insect - moth	2	SBL
Mountain Avens (Dryas octopetala)	flowering plant	12	SBL
Mountain Bog-sedge (Carex rariflora)	flowering plant	6	SBL
Mountain Grisette (Amanita nivalis)	fungus	1	SBL
Mountain Hare (Lepus timidus)	terrestrial mammal	401	SBL
Mountain Ringlet (Erebia epiphron)	insect - butterfly	1	SBL
Mouse Moth (Amphipyra tragopoginis)	insect - moth	18	SBL
Myotis (Myotis)	terrestrial mammal	12	EPS
Narrow-bordered Bee Hawk-moth (Hemaris tityus)	insect - moth	8	SBL
Narrow-headed Ant (Formica exsecta)	insect - hymenopteran	27	SBL
Natterer's Bat (Myotis nattereri)	terrestrial mammal	10	EPS
Neglected Rustic (Xestia castanea)	insect - moth	15	SBL
Nephroma laevigatum (Nephroma laevigatum)	lichen	1	SBL
Nerved Leskea (Pseudoleskeella nervosa)	moss	1	SBL
Netted Mountain Moth (Macaria carbonaria)	insect - moth	8	SBL
Newman's Lady-fern (Athyrium flexile)	fern	2	
Night-flowering Catchfly (Silene noctiflora)	flowering plant	2	SBL
Noctule Bat (Nyctalus noctula)	terrestrial mammal	2	EPS

Northern Brown Argus (Aricia artaxerxes)	insect - butterfly	52	SBL
Northern Dart (Xestia alpicola)	insect - moth	12	SBL
Northern February Red (Brachyptera putata)	insect - stonefly (Plecoptera)	1	SBL
Northern Hawk's-beard (Crepis mollis)	flowering plant	4	SBL
Northern Robberfly (Rhadiurgus variabilis)	insect - true fly (Diptera)	1	SBL
Norway Screw-moss (Syntrichia norvegica)	moss	1	SBL
One-flowered Wintergreen (Moneses uniflora)	flowering plant	1	SBL
Orange Tooth (Hydnellum aurantiacum)	fungus	1	SBL
Osprey (Pandion haliaetus)	bird	617	WCA Schedule 1
Pale Bristle-moss (Orthotrichum pallens)	moss	2	SBL
Pale Eggar (Trichiura crataegi)	insect - moth	8	SBL
Pannaria conoplea (Pannaria conoplea)	lichen	5	SBL
Pannaria rubiginosa (Pannaria rubiginosa)	lichen	2	SBL
Pearl-bordered Fritillary (Boloria euphrosyne)	insect - butterfly	51	SBL
Peltigera collina (Peltigera collina)	lichen	2	SBL
Peregrine (Falco peregrinus)	bird	32	WCA Schedule 1
Pied Clothes (Nemapogon picarella)	insect - moth	1	SBL
Pied-winged Robberfly (Pamponerus germanicus)	insect - true fly (Diptera)	1	SBL
Pillwort (Pilularia globulifera)	fern	1	SBL
Pine Marten (Martes martes)	terrestrial mammal	274	WCA Schedule 5
Pine Milkcap (Lactarius musteus)	fungus	5	SBL
Pink-footed Goose (Anser brachyrhynchus)	bird	10	BoCC Amber List
Pipistrelle Bat species (Pipistrellus)	terrestrial mammal	165	EPS
Pitted Frillwort (Fossombronia foveolata)	liverwort	1	SBL
Pochard (Aythya ferina)	bird	5	SBL
Pointed Beard-moss (Didymodon acutus)	moss	3	SBL
Pointed Frostwort (Gymnomitrion apiculatum)	liverwort	1	WCA Schedule 8
Porbeagle Shark (Lamna nasus)	cartilagenous fish (Chondrichthyes)	1	Priority Marine Feature
Pretty Cord-moss (Funaria pulchella)	moss	2	SBL
Prickly Poppy (Papaver argemone)	flowering plant	7	SBL
Ptarmigan (Lagopus muta)	bird	74	BoCC Red List
Purple Milk-vetch (Astragalus danicus)	flowering plant	24	SBL
Purple Sandpiper (Calidris maritima)	bird	1	WCA Schedule 1

Ramalina fraxinea (Ramalina fraxinea)	lichen	4	SBL
Rampion Bellflower (Campanula rapunculus)	flowering plant	2	SBL
Red Carpet (Xanthorhoe decoloraria)	insect - moth	5	SBL
Red Grouse (Lagopus lagopus)	bird	393	SBL
Red Kite (Milvus milvus)	bird	29	WCA Schedule 1 & 1A
Red-necked Grebe (Podiceps grisegena)	bird	1	SBL
Redshank (Tringa totanus)	bird	108	BoCC Amber List
Red-throated Diver (Gavia stellata)	bird	9	WCA Schedule 1
Redwing (Turdus iliacus)	bird	25	WCA Schedule 1
Reed Bunting (Emberiza schoeniclus)	bird	187	SBL
Reflexed Feather-moss (Brachythecium reflexum)	moss	1	SBL
Rhizocarpon eupetraeoides (Rhizocarpon eupetraeoides)	lichen	1	SBL
Ridged Tooth (Hydnellum scrobiculatum)	fungus	11	SBL
Ring Ouzel (Turdus torquatus)	bird	56	SBL
Risso's Dolphin (Grampus griseus)	marine mammal	1	EPS
Rosy Minor (Litoligia literosa)	insect - moth	56	SBL
Rosy Rustic (Hydraecia micacea)	insect - moth	160	SBL
Rounded Rustwort (Marsupella sparsifolia)	liverwort	1	SBL
Round-leaved Wintergreen (Pyrola rotundifolia)	flowering plant	1	SBL
Ruff (Calidris pugnax)	bird	1	WCA Schedule 1
Rugged Stonewort (Chara rudis)	stonewort	1	SBL
Russula laccata (Russula laccata)	fungus	2	SBL
Rustic (Hoplodrina blanda)	insect - moth	6	SBL
Rusty Fork-moss (Dicranum spurium)	moss	1	SBL
Rye Brome (Bromus secalinus)	flowering plant	5	SBL
Salad Burnet (Sanguisorba minor)	flowering plant	2	SBL
Sallow (Cirrhia icteritia)	insect - moth	52	SBL
Saltmarsh Thread-moss (Bryum salinum)	moss	1	SBL
Sand Deceiver (Laccaria maritima)	fungus	1	SBL
Sandwich Tern (Sterna sandvicensis)	bird	29	SBL
Sarcodon squamosus (Sarcodon squamosus)	fungus	9	SBL
Scaup (Aythya marila)	bird	1	WCA Schedule 1
Scented Knight (Tricholoma apium)	fungus	1	SBL
Scotch Burnet (Zygaena exulans subsp. subochracea)	insect - moth	1	SBL
Scottish Crossbill (Loxia scotica)	bird	14	SBL
Shaded Broad-bar (Scotopteryx chenopodiata)	insect - moth	44	SBL

Shepherd's Cress (Teesdalia nudicaulis)	flowering plant	22	SBL
Shepherd's-needle (Scandix pecten-veneris)	flowering plant	3	SBL
Short-eared Owl (Asio flammeus)	bird	66	SBL
Shoulder-striped Wainscot (Leucania comma)	insect - moth	9	SBL
Showy Bristle-moss (Orthotrichum speciosum)	moss	5	SBL
Siskin (Spinus spinus)	bird	410	SBL
Skylark (Alauda arvensis)	bird	488	SBL
Slavonian Grebe (Podiceps auritus)	bird	5	WCA Schedule 1
Slender Beard-moss (Didymodon icmadophilus)	moss	3	SBL
Slender Gland-moss (Tayloria tenuis)	moss	1	SBL
Slender Rock-moss (Andreaea alpestris)	moss	3	SBL
Slender Trefoil (Trifolium micranthum)	flowering plant	6	SBL
Slow-worm (Anguis fragilis)	reptile	16	WCA Schedule 5 (part)
Small Blue (Cupido minimus)	insect - butterfly	246	SBL
Small Cow-wheat (Melampyrum sylvaticum)	flowering plant	2	SBL
Small Dark Yellow Underwing (Coranarta cordigera)	insect - moth	9	SBL
Small Heath (Coenonympha pamphilus)	insect - butterfly	384	SBL
Small Mesh-weaver (Dictyna pusilla)	spider (Araneae)	4	SBL
Small Pearl-bordered Fritillary (Boloria selene)	insect - butterfly	157	SBL
Small Phoenix (Ecliptopera silaceata)	insect - moth	28	SBL
Small Square-spot (Diarsia rubi)	insect - moth	89	SBL
Small-flowered Catchfly (Silene gallica)	flowering plant	3	SBL
Small-spored Rock-moss (Andreaea sinuosa)	moss	3	SBL
Small-white Orchid (Pseudorchis albida)	flowering plant	4	SBL
Smew (Mergellus albellus)	bird	1	SBL
Snipe (Gallinago gallinago)	bird	275	BoCC Amber List
Snow Bunting (Plectrophenax nivalis)	bird	57	WCA Schedule 1
Snow Feather-moss (Brachythecium glaciale)	moss	2	SBL
Snow Pincerwort (Cephalozia ambigua)	liverwort	2	SBL
Snow Rock-moss (Andreaea nivalis)	moss	6	SBL
Song Thrush (Turdus philomelos)	bird	507	SBL
Soprano Pipistrelle (Pipistrellus pygmaeus)	terrestrial mammal	112	EPS
Sperm Whale (Physeter macrocephalus)	marine mammal	1	EPS

Sphaeridium scarabaeoides (Sphaeridium scarabaeoides)	insect - beetle (Coleoptera)	1	SBL
Spinach (Eulithis mellinata)	insect - moth	1	SBL
Spinose Thyme-moss (Mnium spinosum)	moss	1	SBL
Spiny Restharrow (Ononis spinosa)	flowering plant	1	SBL
Spotted Flycatcher (Muscicapa striata)	bird	174	SBL
Sprig-moss (Aongstroemia longipes)	moss	1	SBL
Stabler's rustwort (Marsupella stableri)	liverwort	1	
Starling (Sturnus vulgaris)	bird	402	SBL
Streak (Chesias legatella)	insect - moth	79	SBL
Sun Spurge (Euphorbia helioscopia)	flowering plant	44	SBL
Sunset Webcap (Cortinarius limonius)	fungus	1	SBL
Swan-necked Earth-moss (Microbryum curvicolle)	moss	1	SBL
Swift (Apus apus)	bird	465	SBL
Swine-cress (Lepidium coronopus)	flowering plant	5	SBL
Sword-grass (Xylena exsoleta)	insect - moth	31	SBL
Tipula melanoceros (Tipula melanoceros)	insect - true fly (Diptera)	2	SBL
Tree Pipit (Anthus trivialis)	bird	114	SBL
Tree Sparrow (Passer montanus)	bird	78	SBL
Triangle Hammock-spider (Saaristoa firma)	spider (Araneae)	3	SBL
Tufted Saxifrage (Saxifraga cespitosa)	flowering plant	8	SBL
Turtle Dove (Streptopelia turtur)	bird	1	SBL
Twinflower (Linnaea borealis)	flowering plant	22	SBL
Twite (Linaria flavirostris)	bird	21	SBL
Varnished Hook-moss (Hamatocaulis vernicosus)	moss	1	WCA Schedule 8
V-Moth (Macaria wauaria)	insect - moth	1	SBL
Wahlenberg's Spur-moss (Oncophorus wahlenbergii)	moss	1	SBL
Wall Whorl Snail (Vertigo pusilla)	mollusc	1	
Warne's Thread-moss (Bryum warneum)	moss	2	SBL
Water Grimmia (Schistidium agassizii)	moss	2	SBL
Waved Fork-moss (Dicranum bergeri)	moss	1	SBL
Wavy Meadow-grass (Poa flexuosa)	flowering plant	4	SBL
West European Hedgehog (Erinaceus europaeus)	terrestrial mammal	130	SBL
White Ermine (Spilosoma lubricipeda)	insect - moth	72	SBL
White Mustard (Sinapis alba)	flowering plant	8	SBL
White Ramping-fumitory (Fumaria capreolata)	flowering plant	49	SBL
White-line Dart (Euxoa tritici)	insect - moth	10	SBL

White-tailed Eagle (Haliaeetus albicilla)	bird	11	WCA Schedule 1, 1A & A1
Whooper Swan (Cygnus cygnus)	bird	14	WCA Schedule 1
Whorled Solomon's-seal (Polygonatum verticillatum)	flowering plant	1	SBL
Whortle-leaved Willow (Salix myrsinites)	flowering plant	5	SBL
Wild Pansy (Viola tricolor)	flowering plant	78	SBL
Wildcat (Felis silvestris)	terrestrial mammal	101	EPS
Wood Sandpiper (Tringa glareola)	bird	1	WCA Schedule 1
Wood Warbler (Phylloscopus sibilatrix)	bird	13	SBL
Woodcock (Scolopax rusticola)	bird	248	SBL
Woolly Tooth (Phellodon tomentosus)	fungus	12	SBL
Yellow Bartsia (Parentucellia viscosa)	flowering plant	10	SBL
Yellowhammer (Emberiza citrinella)	bird	360	SBL
Yellow-vetch (Vicia lutea)	flowering plant	1	SBL

North East Biodiversity Partnership Locally Important Species		
Species	**Taxon Group**	**No of Records**
Agrimony (Agrimonia eupatoria)	flowering plant	5
Alchemilla glomerulans (Alchemilla glomerulans)	flowering plant	2
Allseed (Radiola linoides)	flowering plant	13
Alpine Cat's-tail (Phleum alpinum)	flowering plant	2
Alpine Cinquefoil (Potentilla crantzii)	flowering plant	24
Alpine Lady-fern (Athyrium distentifolium)	fern	56
Alpine Meadow-rue (Thalictrum alpinum)	flowering plant	35
Alpine Mouse-ear (Cerastium alpinum)	flowering plant	5
Alpine Saw-wort (Saussurea alpina)	flowering plant	30
Alpine Saxifrage (Saxifraga nivalis)	flowering plant	2
Alpine Speedwell (Veronica alpina)	flowering plant	26
Annual Sea-blite (Suaeda maritima)	flowering plant	1
Aspen Bracket (Phellinus tremulae)	fungus	3
Autumn Gentian (Gentianella amarella subsp. amarella)	flowering plant	7
Awlwort (Subularia aquatica)	flowering plant	1
Baltic Rush (Juncus balticus)	flowering plant	38
Beige Coral (Clavulinopsis umbrinella)	fungus	3
Bird's-foot (Ornithopus perpusillus)	flowering plant	18
Bird's-nest Orchid (Neottia nidus-avis)	flowering plant	4
Black Alpine-sedge (Carex atrata)	flowering plant	11
Black Bog-rush (Schoenus nigricans)	flowering plant	8
Bladder Campion (Silene vulgaris)	flowering plant	14
Bloody Crane's-bill (Geranium sanguineum)	flowering plant	1
Blue Water-Speedwell (Veronica anagallis-aquatica)	flowering plant	2
Bluebell (Hyacinthoides non-scripta)	flowering plant	35
Bog Hair-grass (Deschampsia setacea)	flowering plant	6

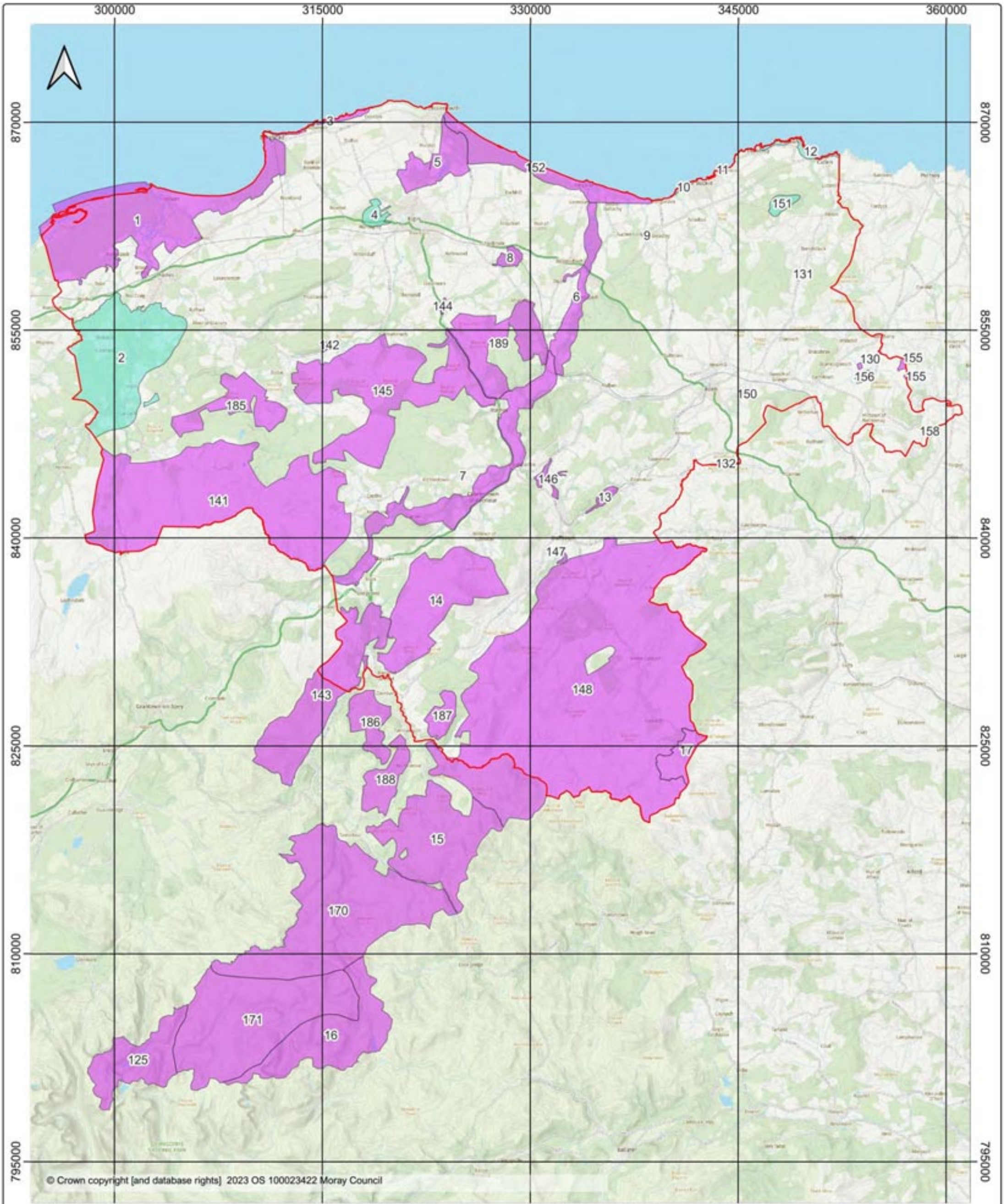
Bog Pimpernel (Anagallis tenella)	flowering plant	1
Booted Knight (Tricholoma focale)	fungus	4
Brackish Water-crowfoot (Ranunculus baudotii)	flowering plant	2
Broad-leaved Cottongrass (Eriophorum latifolium)	flowering plant	11
Broad-leaved Helleborine (Epipactis helleborine)	flowering plant	21
Brown Sedge (Carex disticha)	flowering plant	3
Bur Chervil (Anthriscus caucalis)	flowering plant	14
Celery-leaved Buttercup (Ranunculus sceleratus)	flowering plant	2
Chaffweed (Centunculus minimus)	flowering plant	5
Clustered Dock (Rumex conglomeratus)	flowering plant	11
Common Cornsalad (Valerianella locusta)	flowering plant	2
Common Twayblade (Neottia ovata)	flowering plant	42
Common Yellow-sedge (Carex viridula subsp. oedocarpa)	flowering plant	115
Coralroot Orchid (Corallorhiza trifida)	flowering plant	25
Creeping Yellow-cress (Rorippa sylvestris)	flowering plant	6
Crimson Waxcap (Hygrocybe punicea)	fungus	12
Crosswort (Cruciata laevipes)	flowering plant	2
Dark-red Helleborine (Epipactis atrorubens)	flowering plant	22
Dwarf Birch (Betula nana)	flowering plant	10
Dwarf Eelgrass (Zostera (Zosterella) noltei)	flowering plant	1
Dwarf Willow (Salix herbacea)	flowering plant	57
Early-purple Orchid (Orchis mascula)	flowering plant	37
Earthy Waxcap (Hygrocybe fornicata)	fungus	1
Eelgrass (Zostera (Zostera) marina)	flowering plant	2
English Stonecrop (Sedum anglicum)	flowering plant	11
Eurasian Water Shrew (Neomys fodiens)	terrestrial mammal	23
Field Scabious (Knautia arvensis)	flowering plant	1
Floating Bur-reed (Sparganium angustifolium)	flowering plant	9
Fragrant Agrimony (Agrimonia procera)	flowering plant	1
Fragrant Orchid (Gymnadenia conopsea)	flowering plant	71
Frosted Orache (Atriplex laciniata)	flowering plant	6
Galerina harrisonii (Galerina harrisonii)	fungus	1
Galium mollugo subsp. erectum (Galium mollugo subsp. erectum)	flowering plant	2
Goat's-Beard (Tragopogon pratensis subsp. minor)	flowering plant	14
Goldilocks Buttercup (Ranunculus auricomus)	flowering plant	10
Great Sundew (Drosera anglica)	flowering plant	16
Greater Pond-sedge (Carex riparia)	flowering plant	4
Greater Spearwort (Ranunculus lingua)	flowering plant	2
Green Spleenwort (Asplenium viride)	fern	44
Grey Club-rush (Schoenoplectus tabernaemontani)	flowering plant	12
Gypsywort (Lycopus europaeus)	flowering plant	1
Hair Sedge (Carex capillaris)	flowering plant	26
Hairy Rock-cress (Arabis hirsuta)	flowering plant	49
Hairy Sedge (Carex hirta)	flowering plant	1

Hairy Stonecrop (Sedum villosum)	flowering plant	33
Hare's-foot Clover (Trifolium arvense)	flowering plant	19
Heath Fragrant-orchid (Gymnadenia borealis)	flowering plant	2
Heath Rivulet (Perizoma minorata)	insect - moth	1
Hedge Bedstraw (Galium mollugo)	flowering plant	23
Herb-paris (Paris quadrifolia)	flowering plant	18
Interrupted Clubmoss (Lycopodium annotinum)	clubmoss	55
Ivy-leaved Duckweed (Lemna trisulca)	flowering plant	2
Knotted Clover (Trifolium striatum)	flowering plant	4
Least Bur-reed (Sparganium natans)	flowering plant	5
Lesser Chickweed (Stellaria pallida)	flowering plant	15
Lesser Marshwort (Apium inundatum)	flowering plant	3
Lesser Pond-sedge (Carex acutiformis)	flowering plant	1
Lesser Tussock-sedge (Carex diandra)	flowering plant	5
Lesser Water-parsnip (Berula erecta)	flowering plant	1
Limestone Bedstraw (Galium sterneri)	flowering plant	45
Long-stalked Pondweed (Potamogeton praelongus)	flowering plant	3
Long-stalked Yellow-sedge (Carex viridula subsp. brachyrrhyncha)	flowering plant	50
Maiden Pink (Dianthus deltoides)	flowering plant	3
Many-stalked Spike-rush (Eleocharis multicaulis)	flowering plant	6
Marsh Fragrant-orchid (Gymnadenia densiflora)	flowering plant	1
Marsh Yellow-cress (Rorippa palustris)	flowering plant	5
Moss Campion (Silene acaulis)	flowering plant	36
Mountain Avens (Dryas octopetala)	flowering plant	12
Mountain Male-fern (Dryopteris oreades)	fern	1
Mountain Marble (Phiaris obsoletana)	insect - moth	1
Mountain Pearl (Udea uliginosalis)	insect - moth	1
Musk Thistle (Carduus nutans)	flowering plant	4
Nitrous Waxcap (Hygrocybe nitrata)	fungus	2
Northern Buckler-fern (Dryopteris expansa)	fern	22
Northern Rock-cress (Arabidopsis petraea)	flowering plant	93
Northern Saltmarsh-grass (Puccinellia distans subsp. borealis)	flowering plant	6
Northern Yellow-cress (Rorippa islandica)	flowering plant	1
Orange Waxcap (Hygrocybe aurantiosplendens)	fungus	1
Oysterplant (Mertensia maritima)	flowering plant	5
Pale Willowherb (Epilobium roseum)	flowering plant	5
Parsley Fern (Cryptogramma crispa)	fern	8
Pink Waxcap (Hygrocybe calyptriformis)	fungus	1
Purple Glasswort (Salicornia ramosissima)	flowering plant	1
Purple Saxifrage (Saxifraga oppositifolia)	flowering plant	43
Pyrenean Scurvygrass (Cochlearia pyrenaica)	flowering plant	22
Quillwort (Isoetes lacustris)	quillwort	7
Rannoch Looper (Macaria brunneata)	insect - moth	6
Rock Whitebeam (Sorbus rupicola)	flowering plant	6
Roseroot (Sedum rosea)	flowering plant	25

Rough Horsetail (Equisetum hyemale)	horsetail	10
Round-leaved Wintergreen (Pyrola rotundifolia)	flowering plant	1
Russet Sedge (Carex saxatilis)	flowering plant	4
Saltmarsh Flat-sedge (Blysmus rufus)	flowering plant	6
Scotch Grass-veneer (Catoptria permutatellus)	insect - moth	1
Sea Aster (Aster tripolium)	flowering plant	4
Sea Club-rush (Bolboschoenus maritimus)	flowering plant	1
Sea Rush (Juncus maritimus)	flowering plant	4
Sea-kale (Crambe maritima)	flowering plant	1
Seaside Centaury (Centaurium littorale)	flowering plant	2
Serrated Wintergreen (Orthilia secunda)	flowering plant	28
Shady Horsetail (Equisetum pratense)	horsetail	21
Sheathed Sedge (Carex vaginata)	flowering plant	42
Shining Crane's-bill (Geranium lucidum)	flowering plant	4
Sibbaldia (Sibbaldia procumbens)	flowering plant	28
Silvery Arches (Polia hepatica)	insect - moth	1
Slender Thistle (Carduus tenuiflorus)	flowering plant	2
Slender-leaved Pondweed (Potamogeton filiformis)	flowering plant	1
Small Adder's-tongue (Ophioglossum azoricum)	fern	7
Small Cranberry (Vaccinium microcarpum)	flowering plant	35
Small Cudweed (Filago minima)	flowering plant	52
Small-flowered Crane's-bill (Geranium pusillum)	flowering plant	15
Small-fruited Yellow-sedge (Carex viridula subsp. viridula)	flowering plant	20
Soft Shield-fern (Polystichum setiferum)	fern	1
Spignel (Meum athamanticum)	flowering plant	11
Spiked Water-milfoil (Myriophyllum spicatum)	flowering plant	6
Splendid Waxcap (Hygrocybe splendidissima)	fungus	3
Spring Sandwort (Minuartia verna)	flowering plant	8
Spring Squill (Scilla verna)	flowering plant	3
Spring Vetch (Vicia lathyroides)	flowering plant	20
Starwort Mouse-ear (Cerastium cerastoides)	flowering plant	23
Swedish Pondweed (Potamogeton x suecicus)	flowering plant	1
Tricholoma pessundatum (Tricholoma pessundatum)	fungus	2
Trifid Bur-marigold (Bidens tripartita)	flowering plant	1
Unbranched Bur-reed (Sparganium emersum)	flowering plant	1
Variegated Horsetail (Equisetum variegatum)	horsetail	39
Viper's-bugloss (Echium vulgare)	flowering plant	14
Wall Lettuce (Mycelis muralis)	flowering plant	5
Water Lobelia (Lobelia dortmanna)	flowering plant	7
Water-plantain (Alisma plantago-aquatica)	flowering plant	5
Welted Thistle (Carduus crispus)	flowering plant	1
Whorled Caraway (Carum verticillatum)	flowering plant	1
Whorl-grass (Catabrosa aquatica)	flowering plant	2
Whortle-leaved Willow (Salix myrsinites)	flowering plant	5
Wild Basil (Clinopodium vulgare)	flowering plant	24
Wild Marjoram (Origanum vulgare)	flowering plant	39

Wood Club-rush (Scirpus sylvaticus)	flowering plant	3
Wood Melick (Melica uniflora)	flowering plant	3
Wood Stitchwort (Stellaria nemorum subsp. nemorum)	flowering plant	42
Wood Vetch (Vicia sylvatica)	flowering plant	16
Yellow Foot Waxcap (Hygrocybe flavipes)	fungus	3
Yellow Loosestrife (Lysimachia vulgaris)	flowering plant	3
Yellow-ringed Carpet (Entephria flavicinctata)	insect - moth	2
Yellow-sedge (Carex viridula)	flowering plant	34

D SINS PLANS



Do not scale this map

Legend

- Local Development Plan Area

SINS

- No Site Visit
- Site Visit

Client: Moray Council

Project: Moray Council Biodiversity Study

Title: Proposed SINS sites for field visit

Scale: 1:250,000 @ A3

Status: Final

Drawing No.	Revision	Date
378201-QGIS001	-	31 Jan 24
Drawn: MM	Checked: JB	Approved: JB

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre

Legend

- SINS Boundary
- Target Note

UKHab Primary Codes

- w2a - native pine woodlands
- h1 - dwarf shrub heath
- h1b - upland heathland

SECONDARY CODES

10	scattered scrub
11	scattered trees
12	scattered bracken
13	scattered dwarf shrubs
14	scattered rushes
37	semi-natural woodland

TARGET NOTES

1 Species-rich g3c6 on hilltop

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Bin of Cullen UKHab Plan

Status
FINAL

Drawing No.	Revision	Date
378201-QGIS013	-	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:8,000 @ A3 0 100 200 300 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road,
Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk

Legend

- SINS Boundary

UKHab Primary Codes

- g4 - modified grassland
- u1b5 - buildings
- u1c - artificial unvegetated unsealed surface
- u1d - suburban mosaic of developed/ natural surface
- u1e - built linear features
- s3b - coastal vegetated shingle
- t1 - littoral rock

SECONDARY CODES

10	scattered scrub
77	neglected
113	sea wall
230	garden

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Buckie UKHab Plan

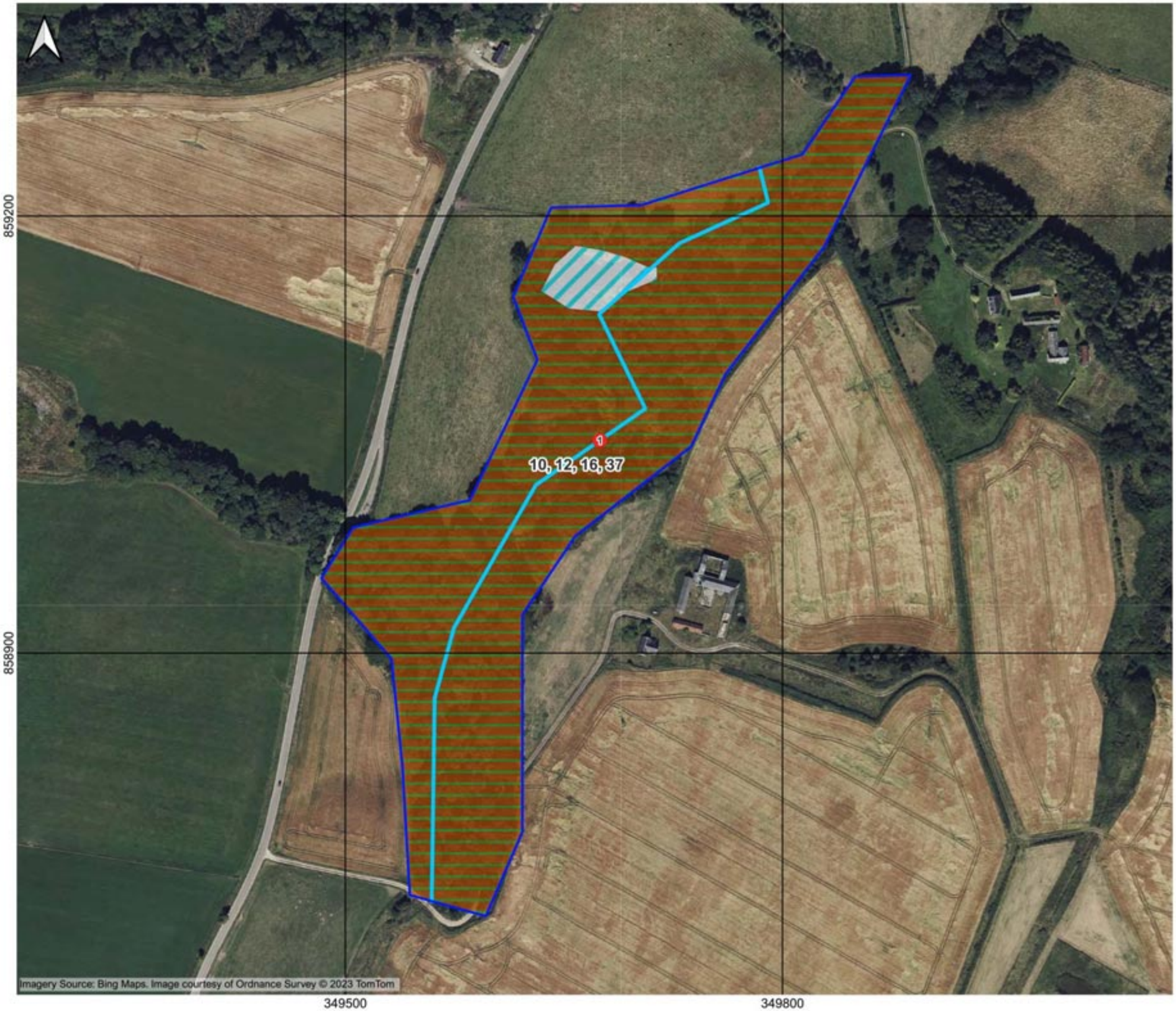
Status
FINAL

Drawing No.	Revision	Date
378201-GIS014	-	03 Oct 2023
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:6,000 @ A3 0 100 200 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road, Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk



Legend

- SINS Boundary
- Target Note

UKHab Primary Codes

- w1f - lowland mixed deciduous woodland
- r1 - standing open water and canals
- Watercourse

SECONDARY CODES

10	scattered scrub
12	scattered bracken
16	tall herb
37	semi-natural woodland

TARGET NOTES

1 Monkeyflower present along length of burn

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Craibstone Quarry UKHab Plan

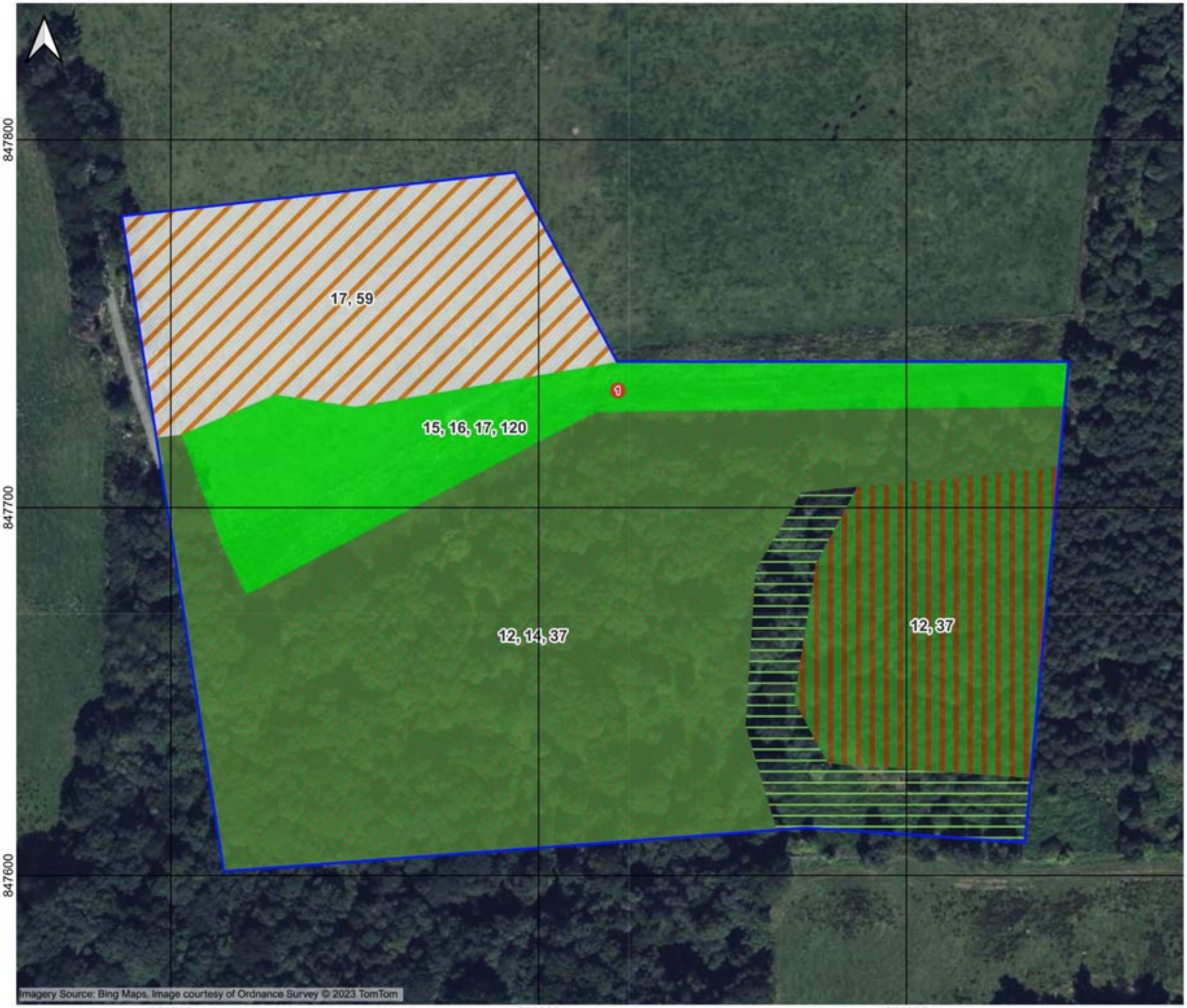
Status
FINAL

Drawing No.	Revision	Date
378201-GIS015	-	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:2,500 @ A3 0 50 100 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road,
Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk



Legend

- SINS Boundary
- Target Note

UKHab Primary Codes

- g1c - bracken
- g4 - modified grassland
- w1e - upland birchwoods
- w1g - other woodland-broadleaved
- c1 - arable and horticulture

SECONDARY CODES

12	scattered bracken
14	scattered rushes
15	rushes dominant
16	tall herb
17	ruderal/ephemeral
37	semi-natural woodland
59	cattle-grazed
120	wet

TARGET NOTES

1 Giant hogweed in ditch

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Craigmancie (Part) UKHab Plan

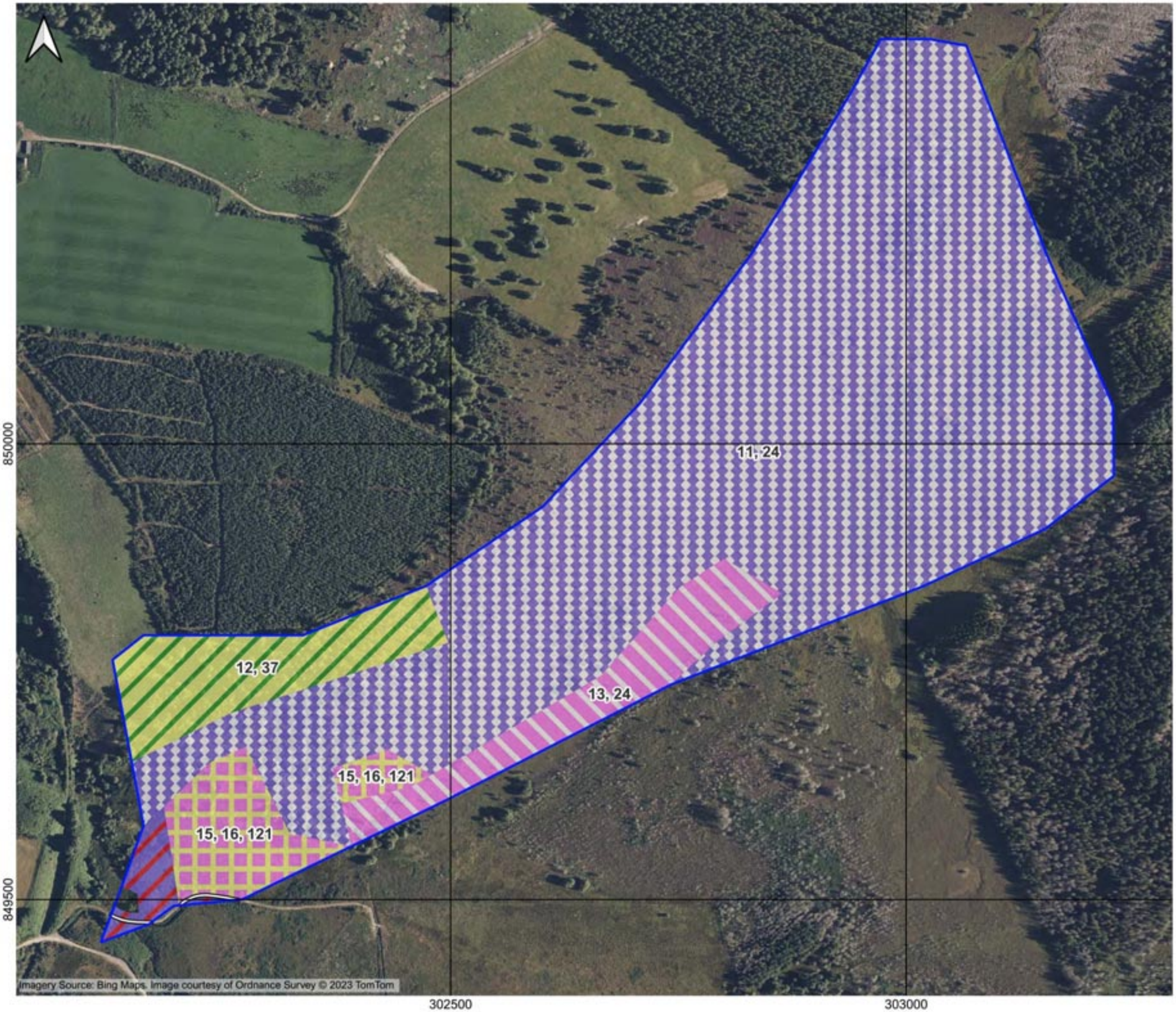
Status
FINAL

Drawing No.	Revision	Date
378201-GIS016	-	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:1,000 @ A3 0 10 20 30 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road,
Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk



Legend

- SINS Boundary

UKHab

- g3c7 - Deschampsia neutral grassland
- w2a - native pine woodlands
- h1a7 - wet heathland with cross-leaved heath, lowland (H4010)
- h1b5 - dry heaths, upland (H4030)
- f1a - blanket bog
- f2b - purple moor grass and rush pastures
- Road

SECONDARY CODES

11	scattered trees
12	scattered bracken
13	scattered dwarf shrubs
15	rushes dominant
16	tall herb
37	semi-natural woodland
121	waterlogged

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Findhorn Valley (Part) UKHab Plan

Status
FINAL

Drawing No.	Revision	Date
378201-GIS017	-	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:4,000 @ A3 0 50 100 150 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road, Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk

Legend

- SINS Boundary

UKHab

- g4 - modified grassland
- u1b - developed land. sealed surface
- s3b - coastal vegetated shingle
- t1 - littoral rock

SECONDARY CODES

113 sea wall

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Portessie UKHab Plan

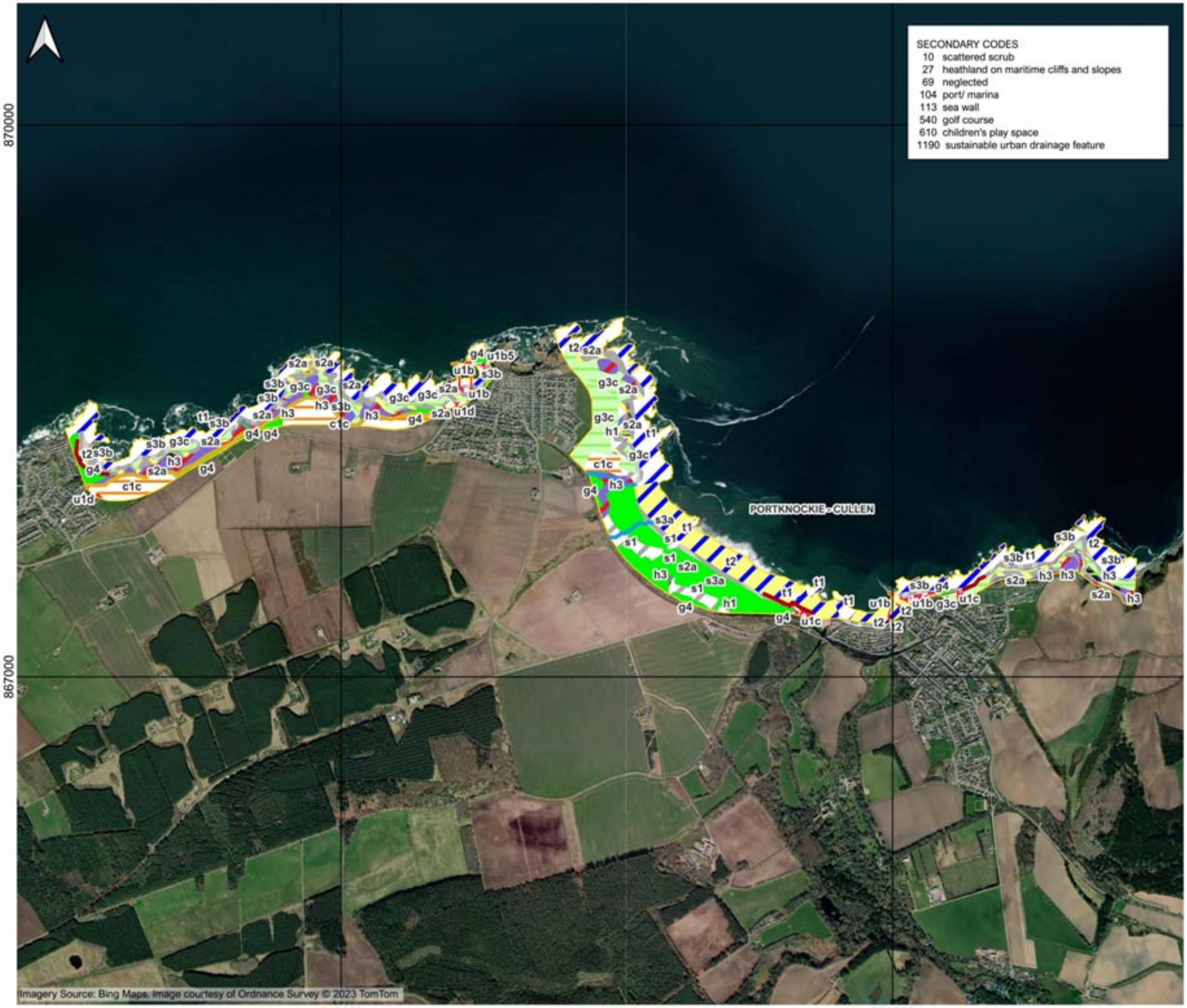
Status
FINAL

Drawing No.	Revision	Date
378201-GIS018	-	03 Oct 2023
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:2,000 @ A3 0 20 40 60 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road,
Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk



Legend

- SINS Boundary

UKHab

- g1c - bracken
- g3c - other neutral grassland
- g4 - modified grassland
- h3 - dense scrub
- c1c - cereal crops
- u1b - developed land. sealed surface
- u1b5 - buildings
- u1b6 - other developed land
- u1c - artificial unvegetated unsealed surface
- u1d - suburban mosaic of developed/ natural surface
- u1e - built linear features
- s1 - inland rock
- s2a - maritime cliff and slopes
- s3a - coastal sand dunes
- s3b - coastal vegetated shingle
- t1 - littoral rock
- t2 - littoral sediment

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Portknockie - Cullen UKHab Plan

Status
FINAL

Drawing No.	Revision	Date
378201-GIS019	-	03 Oct 2023
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:20,000 @ A3
0 200 400 600 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road, Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk

Legend

- SINS Boundary
- Target Note

UKHab Primary Codes

- g1a - lowland dry acid grassland
- g3c7 - Deschampsia neutral grassland
- g3c8 - Holcus-Juncus neutral grassland
- g4 - modified grassland
- w1d - wet woodland
- w2a - native pine woodlands
- f1a - blanket bog
- f2b - purple moor grass and rush pastures

SECONDARY CODES

11	scattered trees
13	scattered dwarf shrubs
14	scattered rushes
15	rushes dominant
16	tall herb
17	ruderal/ephemeral
37	semi-natural woodland
119	seasonally wet
121	waterlogged

TARGET NOTES

1	Heath fragrant-orchid (small population)
2	Lesser butterfly-orchid (small population)
3	Waterlogged area with wetland indicators

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Rowan Bauds UKHab Plan

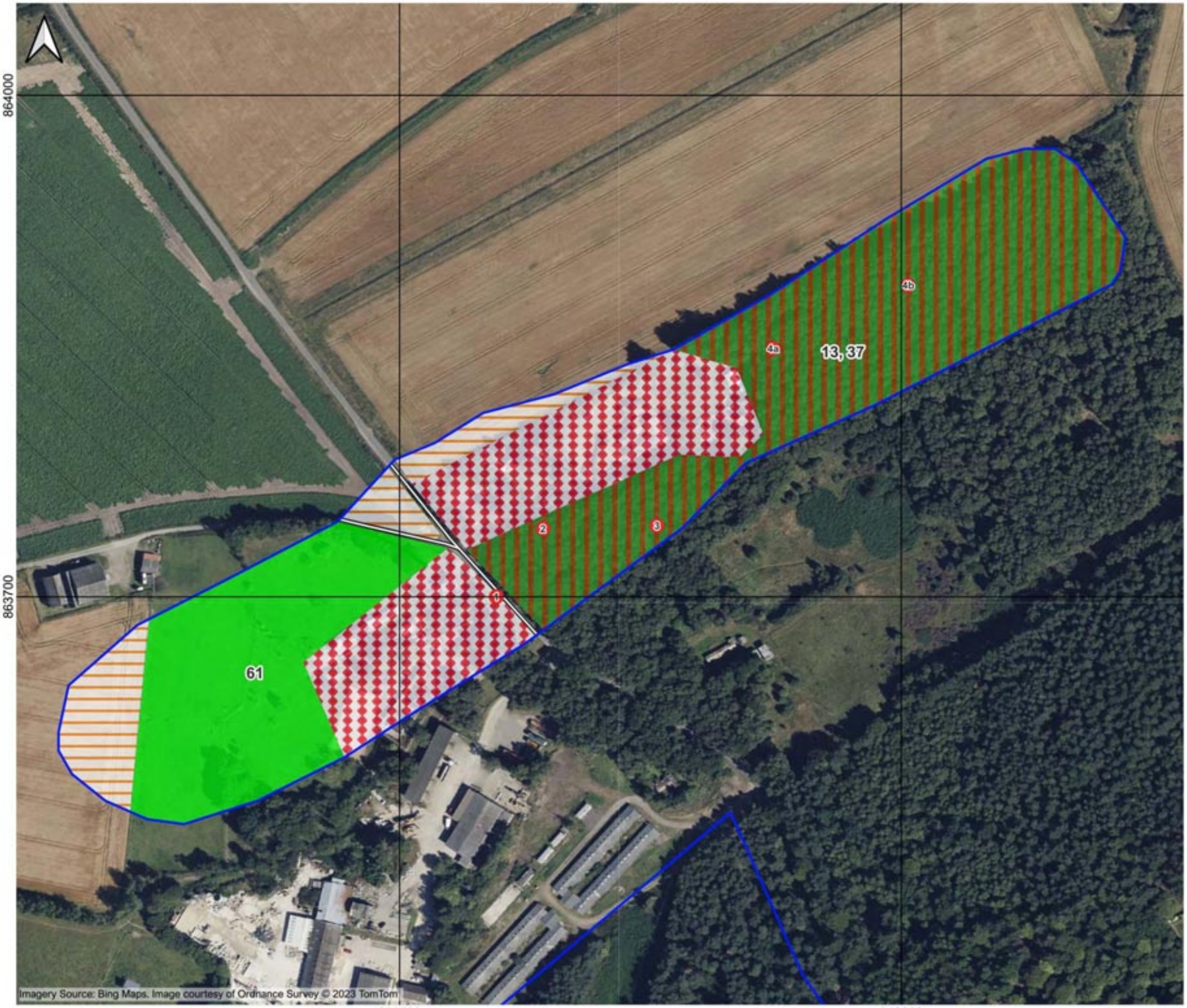
Status
FINAL

Drawing No.	Revision	Date
378201-GIS021	-	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:4,500 @ A3
0 50 100 150 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road,
Banchory, AB31 5ZU. T: 01330 826596
E: info@envirocentre.co.uk W:www.envirocentre.co.uk



Legend

- SINS Boundary
- Target Note

UKHab Primary Codes

- g4 - modified grassland
- w1e - upland birchwoods
- c1c - cereal crops
- u1d - suburban mosaic of developed/natural surface
- w1g6 - line of trees
- Road

SECONDARY CODES

13	scattered dwarf shrubs
37	semi-natural woodland
61	horse-grazed

TARGET NOTES

1. Variegated yellow archangel on roadside
2. Cotoneaster (likely Himalayan) in woodland
3. Small clearing with garden escapes and ruderals
4. Dense bracken between 4a and 4b

Do not scale this map

Client
Moray Council

Project
Moray Council Local Development Plan

Title
Quarrywood (Part) UKHab Plan

Status
FINAL

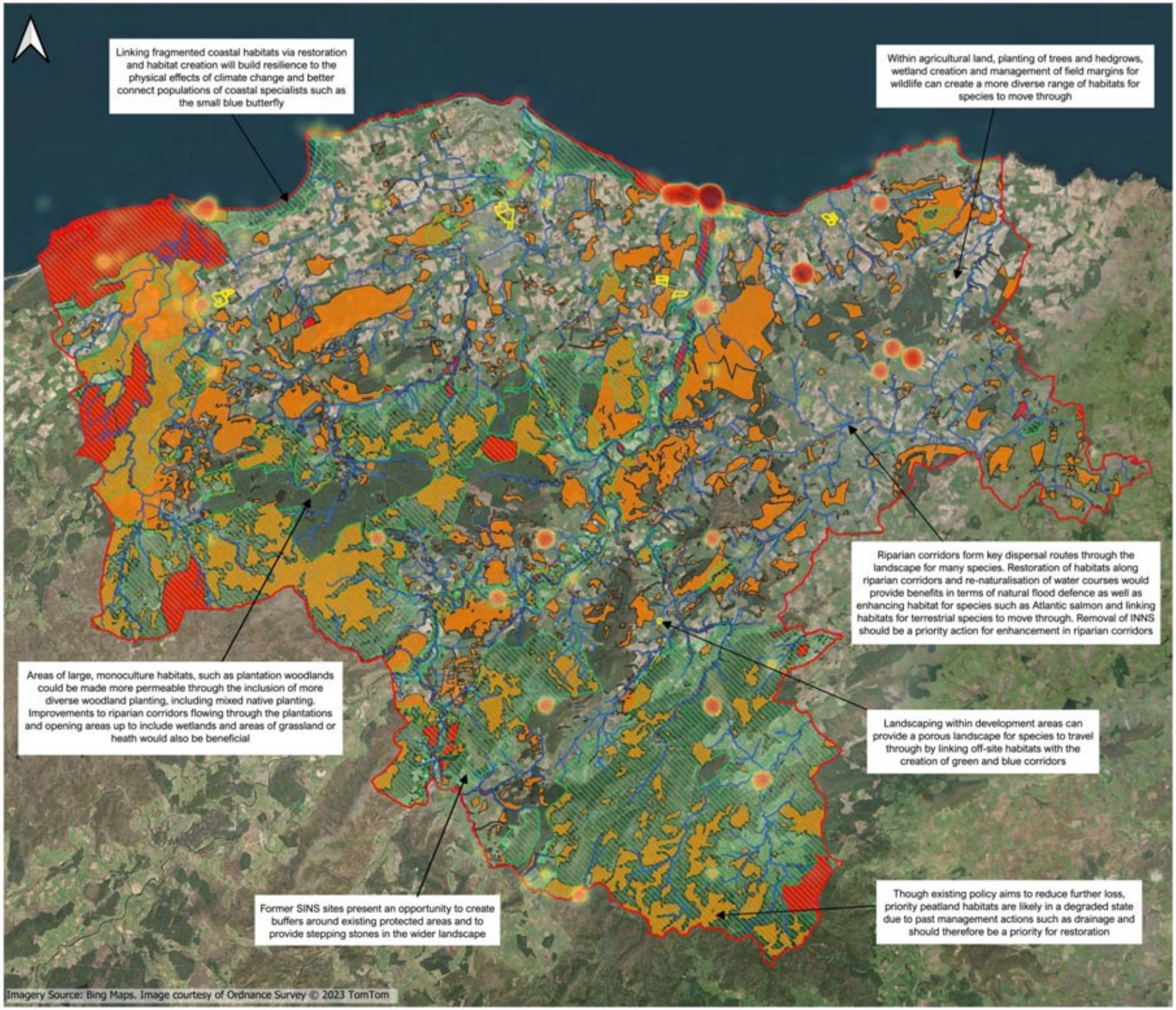
Drawing No.	Revision	Date
378201-GIS020	-	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	SF	MM

Scale
1:2,200 @ A3 0 20 40 60 80 m

Rev	Date	Amendment	Initials
-	-	-	-

envirocentre
Banchory Business Centre, Burn o' Bennie Road, Banchory, AB31 5ZU. T: 01330 826598
E: info@envirocentre.co.uk W:www.envirocentre.co.uk

E OPPORTUNITIES FOR NATURE NETWORK CONNECTIONS



Legend

- Moray LDP Boundary
- Areas with legal and/or strict policy protection
- Areas with less prohibitive policy protection
- Watercourses
- Former SINS Locations
- Key Growth Areas

Heatmap shows biological records hotspots for notable and/or protected species

Areas compiled from the following data:

Red Area - Internationally & Nationally Designated Sites.

Amber Area - Ancient & non-ancient native woodland, Class 1 & 2 peatland, Important Invertebrate Areas.

Do not scale this map

Client
Moray Council

Project
Moray Council LDP

Title
Protected Areas and Nature Network Potential

Status
FINAL

Drawing No.	Revision	Date
378201-QGIS012	B	19 Jan 2024
Drawn	**Checked**	**Approved**
JB	MM	DB

Scale
1:220,000 @ A3 0 2 4 6 8 km

Rev	Date	Amendment	Initials
A	-	-	-

envirocentre
8 Eagle Street, Craighall Business Park, Glasgow, G4 9XA.
T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk

F NPF4 GAP ANALYSIS

Biodiversity is embedded within NPF4. Policy 4 sets out the protections for our existing natural heritage and is supported by Policy 5 protecting soil resource and Policy 6 which sets out protection for woodland, forests and trees. Policy 3 is the key policy which sets out how biodiversity should be considered within development planning and requires a shift from no net loss of biodiversity as a result of development, to developments providing increases in biodiversity through habitat restoration and creation. The table below highlights the differences between the wording of NPF4 biodiversity and supporting policies and equivalent text within the existing Moray Council LDP to highlight where revisions and additions may be required within the future LDP to make sure the policies are aligned.

NFP4 Policy		Moray Council Current Policy	Gap	Action Required
3. Biodiversity LDPs should protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy. They should also promote nature recovery and nature restoration across the development plan area, including by: facilitating the creation of nature networks and strengthening connections between them to support improved ecological connectivity; restoring degraded habitats or creating new habitats; and incorporating measures to increase biodiversity, including populations of priority species.	a) Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.	EP2: All development proposals must, where possible, retain, protect and enhance features of biological interest and provide for their appropriate management. Development must safeguard and where physically possible extend or enhance wildlife corridors and green/blue networks and prevent fragmentation of existing habitats. Development should integrate measures to enhance biodiversity as part of multi-functional spaces/ routes.	Yes	Stronger wording required on the enhancement of biodiversity. Suggest removal of the phrase “where possible” in the first two paragraphs as this is ambiguous. Add ‘*Development **must include** integrated measures to enhance biodiversity as part of multi-functional spaces/ routes*’.
	b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably	EP2: Proposals for 4 or more housing units or 1000m^2 or more of commercial floorspace must create or where appropriate, enhance natural habitats of ecological and amenity value.	Yes	Additional policy or guidance note needed to set out differing requirements for projects meeting criteria of National and Major developments and those requiring EIAs from Local developments.

	better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria: i. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats; ii. wherever feasible, nature-based solutions have been integrated and made best use of; iii. an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements; iv. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with	Developers must demonstrate through a Placemaking Statement where required by Policy PP1 which incorporates a Biodiversity Plan, that they have included biodiversity features in the design of the development. PP1(V) A plan detailing how different elements will contribute to supporting biodiversity must be included in the design statement submitted with the planning application.		The text regarding biodiversity plans is quite vague and does not specify that the biodiversity features need to be enhancements which are additional to biodiversity features which may be necessary to mitigation or compensation for negative effects in relation to the development. It also doesn't state the plans should include long term management and monitoring to ensure they become established as intended. It is appropriate for biodiversity information to be included within the Placemaking Statement, this should be backed up by a more detailed assessment conducted by a suitably experienced ecologist though. In terms of current best practice, there isn't, at the time of writing, a set metric or method for demonstrating enhancements designed for use in Scotland. A research paper recently published by the Scottish Government[35] found that the DEFRA Biodiversity Metric[36] could be used as a basis for assessments with some adjustments. This metric is being

[35] McVittie, A., Cole, L., McCarthy, J., Fisher, H., and Rudman, H. (2023) Research into Approaches to Measuring Biodiversity in Scotland, Final Report to Scottish Government. Available at: https://www.gov.scot/publications/research-approaches-measuring-biodiversity-scotland/pages/3/ (Accessed 26/09/2023)

[36] The Biodiversity metric 4.0 Available at: https://publications.naturalengland.org.uk/publication/6049804846366720 (Accessed 26/09/2023)

	reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and v. local community benefits of the biodiversity and/or nature networks have been considered.			used already in Scotland is currently recommended by other Local Authorities[37] until such time as a Scotland specific metric is available.
	c) Proposals for local development will include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development. Applications for individual householder development, or which fall within scope of (b) above, are excluded from this requirement.	EP2: Proposals for 4 or more housing units or 1000m^2 or more of commercial floorspace must create or where appropriate, enhance natural habitats of ecological and amenity value. Developers must demonstrate through a Placemaking Statement where required by Policy PP1 which incorporates a Biodiversity Plan, that they have included biodiversity features in the design of the development. PP1(V) A plan detailing how different elements will contribute to supporting biodiversity must be included in the design statement	Yes	Additional policy or guidance note needed to set out differing requirements for projects meeting criteria of Local developments compared to National and Major developments and those requiring EIAs. Best practice guidance applicable to local development is available in the NatureScot Developing with Nature Guidance; Guidance on securing positive effects for biodiversity from local development to support NPF4 policy 3(c)[38]

[37] Aberdeenshire Council (2023) Securing positive benefits for biodiversity in a new development. Planning advice PA2023-10. Available at: http://publications.aberdeenshire.gov.uk/dataset/0ceb7c55-b43d-45c4-a311-798f4bc9fa75/resource/fd777edd-c277-4621-bd31-f3672edef765/download/pa2023-10---planning-advice---securing-positive-effects-for-biodiversity.pdf (Accessed 26/09/2023)
[38] Available at: https://www.nature.scot/doc/developing-nature-guidance (Accessed 26/09/2023)

		submitted with the planning application.		
	d) Any potential adverse impacts, including cumulative impacts, of development proposals on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.	EP2 Where development would result in loss of natural habitats of ecological amenity value, compensatory habitat creation will be required where deemed appropriate.	Yes	Current LDP text to be strengthened. At present it only addresses adverse impact relating to habitat loss but there may be adverse impacts to retained habitats and species, and the ecosystem services they provide, which should be mitigated and compensated for. The addition of the term “where deemed appropriate” is quite vague and introduces ambiguity. Compensation could take the form of enhancement or restoration in existing habitats as well as creation of new ones. This NFP4 policy text places emphasis on minimisation of adverse impacts through planning and design. The 2027 LDP can help address this through the careful selection of sites and identification of nature networks within spatial policies.
4. Natural Spaces LDPs will identify and protect locally, regionally, nationally and internationally important	a) Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.	No equivalent policy text. There is some text in relation to protected sites and EPS but at present there is no general statement on impacts to the	Yes	Additional policy text recommended to include the natural environment more broadly. NFP4 text isn’t clear in the definition of unacceptable impacts, however it is

natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area.		natural environment outside of features with strict legal protection.		anticipated that areas of importance for biodiversity which are not appropriate for development will be identified through the LDP and Strategic Environmental Assessment (SEA) process.
	b) Development proposals that are likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an "appropriate assessment" of the implications for the conservation objectives.	EP1a) Development likely to have a significant effect on a European site and which is not directly connected with or necessary to the conservation management of the site must be subject to an appropriate assessment of the implications for its conservation objectives.	No	Current policy text is in line with NFP4 text.
	c) Development proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where: i. The objectives of designation and the overall integrity of the areas will not be compromised; or ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by	EP1b) Development proposals which will affect a National Park, National Scenic Area, Site of Special Scientific Interest or National Nature Reserve will only be permitted where: i) The objectives of designation and the overall integrity of the area will not be compromised; or ii) Any significant adverse effects on	No	Current policy text is in line with NFP4 text.

	social, environmental or economic benefits of national importance. All Ramsar sites are also European sites and/or Sites of Special Scientific Interest and are extended protection under the relevant statutory regimes.	the qualities for which the site has been designated are clearly outweighed by social, environmental or economic benefits of national importance.		
	d) Development proposals that affect a site designated as a local nature conservation site or landscape area in the LDP will only be supported where: i. Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.	EP1c) Development proposals likely to have a significant adverse effect on Local Nature Reserves, wildlife sites or other valuable local habitats will be refused unless it can be demonstrated that; i) Public benefits clearly outweigh the nature conservation value of the site, and ii) There is a specific locational requirement for the development; and iii) Any potential impacts can be satisfactorily mitigated to conserve and enhance the site's residual conservation interest.	No	Current policy text is in line with NFP4 text.
	e) The precautionary principle will be applied in accordance with relevant	No equivalent policy text.	Yes	Although there is no text in relation to use of the precautionary principal, the requirement for this is well established

	legislation and Scottish Government guidance.			within legislation, case law and guidance and doesn't necessarily need to be specified within the LDP.
	f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.	EP1d) Where a European Protected Species may be present or affected by development or activity arising from development, a species survey and where necessary a Species Protection Plan should be prepared to accompany the planning application, to demonstrate how the Regulations will be complied with. The survey should be carried out by a suitably experienced and licensed ecological surveyor. Proposals that would have an adverse effect on European Protected Species will not be approved unless; The need for development is one that is possible for SNH to grant a license for under the Regulations. There is no satisfactory alternative to the development. The development will not be detrimental to the maintenance of	No	Current policy text is in line with NFP4 text.

		the favourable conservation status of the species. EP1e) Where a protected species may be present of affected by development or activity arising from development, a species survey and where necessary, a Species Protection Plan should be prepared to accompany the planning application to demonstrate how legislation will be complied with. The survey should be carried out by a suitably experienced ecological surveyor who may need to be licensed depending on the species being surveyed for. Proposals which would have an adverse effect on badgers or their setts must be accompanied by a Badger Protection Plan demonstrating how impacts will be avoided, mitigated, minimised or compensated for.		
	g) Development proposals in areas identified as wild land in the Nature Scot Wild Land Areas map will only be supported where the proposal:	No equivalent policy text.	No	No Wild Land Areas have been identified within the LDP area and as such no policy regarding them is required.

	i. will support meeting renewable energy targets; or, ii. is for small scale development directly linked to a rural business or croft, or is required to support a fragile community in a rural area. All such proposals must be accompanied by a wild land impact assessment which sets out how design, siting, or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the wild land, as well as any management and monitoring arrangements where appropriate. Buffer zones around wild land will not be applied, and effects of development outwith wild land areas will not be a significant consideration.			
Policy 5. Soils LDPs should protect locally, regionally, nationally and internationally valued soils, including land of lesser quality that is culturally or locally important for primary use.	a) Development proposals will only be supported if they are designed and constructed: i. In accordance with the mitigation hierarchy by first avoiding and then minimising the amount of disturbance to soils on undeveloped land; and ii. In a manner that protects soil from damage including from compaction and erosion, and that minimises soil sealing.	No specific policy text regarding non-peat soils	Yes	The exiting policy EP16 should be amended to specify protection of soil as per the NFP4 wording.

	b) Development proposals on prime agricultural land, or land of lesser quality that is culturally or locally important for primary use, as identified by the LDP, will only be supported where it is for: i. Essential infrastructure and there is a specific locational need and no other suitable site; ii. Small-scale development directly linked to a rural business, farm or croft or for essential workers for the rural business to be able to live onsite; iii. The development of production and processing facilities associated with the land produce where no other local site is suitable; iv. The generation of energy from renewable sources or the extraction of minerals and there is secure provision for restoration; and In all of the above exceptions, the layout and design of the proposal minimises the amount of protected land that is required.	No specific policy text regarding protection of agricultural land.	Yes	The existing policy EP16 should be amended to specify protection of prime agricultural land as per the NFP4 wording.
	c) Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:	No equivalent policy text	Yes	Although Policy EP16 does concern developments in relation to peat and carbon rich soils it doesn't specifically

	i. Essential infrastructure and there is a specific locational need and no other suitable site; ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets; iii. Small-scale development directly linked to a rural business, farm or croft; iv. Supporting a fragile community in a rural or island area; or v. Restoration of peatland habitats.			set out the types of projects which will be supported as per the NFP4 text. Existing text to be amended so that the policies are aligned.
	d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify: i. the baseline depth, habitat condition, quality and stability of carbon rich soils; ii. the likely effects of the development on peatland, including on soil disturbance; and	EP16 Where peat and other carbon rich soils are present disturbance to them may lead to the release of carbon dioxide contributing to the greenhouse gas emissions. Applications should minimise this release and must be accompanied by an assessment of the likely effects associated with any development work and aim to mitigate any adverse impacts arising. Where development on peat is deemed acceptable, a peat depth survey must be submitted which demonstrates that unnecessary disturbance, movement,	Yes	Existing EP16 text requires peat assessment but there are additional aspects specified within the NFP4 text which aren't included. Text should be amended to request inclusion of habitat condition and peat stability assessments as well as details of net effects of development on climate emissions and carbon loss. The current EP16 text also does not specify requirements for restoration/enhancement plans although this may come under "appropriate re-use".

	iii. the likely net effects of the development on climate emissions and loss of carbon. This assessment should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided and then minimised through best practice. A peat management plan will be required to demonstrate that this approach has been followed, alongside other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.	degradation or erosion of peat is avoided and proposes suitable mitigation measures and appropriate reuse.		
	e) Development proposals for new commercial peat extraction, including extensions to existing sites, will only be supported where: i. the extracted peat is supporting the Scottish whisky industry; ii. there is no reasonable substitute; iii. the area of extraction is the minimum necessary and the proposal retains an in-situ residual depth of peat of at least 1 metre across the whole site, including drainage features;	EP16 Commercial peat extraction will not be supported.	Yes	Text within EP16 to be amended to set out the specific exception as described in NFP4.

	iv. the time period for extraction is the minimum necessary; and v. there is an agreed comprehensive site restoration plan which will progressively restore, over a reasonable timescale, the area of extraction to a functioning peatland system capable of achieving carbon sequestration.			
6. Woodland LDPs should identify and protect existing woodland and the potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks. The spatial strategy should identify and set out proposals for forestry, woodlands and trees in the area, including their development, protection and enhancement, resilience to climate change, and the expansion of a range of types to provide multiple benefits. This will be supported and informed by an up to date	a) Development proposals that enhance, expand and improve woodland and tree cover will be supported.	EP7a) Proposals which support the economic, social and environmental objectives and project identified in the Moray Forestry and Woodlands Strategy will be supported where they meet the requirements of other relevant Local Development Plan Policies.	No	The woodland strategy is currently being revised however it is anticipated that objectives will include enhancement, expansion and improvements to woodland and tree cover as per NFP4.
	b) Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;	EP7c) In support of the Scottish Government's Control of Woodland Removal Policy, Woodland removal within native woodlands identified as features of sites protected under Policy EP1 or woodland identified as Ancient woodland will not be supported. In all other woodlands development which involves permanent woodland removal will only be permitted where it would	Yes	NFP4 policy is partially covered. LDP policy text should be amended to include protection of individual veteran or ancient trees (which may lie outside of identified ancient woodlands) or trees with high biodiversity value, as well as native woodlands outwith designated sites and hedgerows. Individual trees of value may be protected via Tree Preservation Orders but it is considered that there will likely be many trees in the wider

Forestry and Woodland Strategy.	iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy; iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.	achieve significant and clearly defined additional public benefits (excluding housing)and where removal will not result in unacceptable adverse effects on the amenity, landscape, biodiversity, economic or recreational value of the woodland or prejudice the management of the woodland.		LDP area not identified and protected in this way.
	c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.	EP7c) In all other woodlands development which involves permanent woodland removal will only be permitted where it would achieve significant and clearly defined additional public benefits (excluding housing). EP7e) Where trees or woodland are removed in association with development, developers must provide compensatory planting to be agreed with the planning authority either on site, or an alternative site in Moray which is in the applicants control or through a commuted payment to the planning authority to deliver compensatory planting and recreational greenspace.	No	Policy text is aligned and no action required.

	d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.	EP7a) Proposals which support the economic, social and environmental objectives and project identified in the Moray Forestry and Woodlands Strategy will be supported where they meet the requirements of other relevant Local Development Plan Policies.	Yes	LDP text partially covers NFP4 but would benefit from more explicit wording in relation to developments on land identified as being suitable for woodland creation and in relation to enhancement and improvements to woodlands.