Moray Council

Wednesday, 24 April 2024

SUPPLEMENTARY AGENDA

The undernoted reports have been added to the Agenda for the meeting of the **Moray Council** to be held at **Council Chambers**, **Council Office, High Street, Elgin, IV30 1BX** on **Wednesday, 24 April 2024** at **09:30**.

BUSINESS

Watching the Meeting

You can watch the webcast live by going to:

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

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

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REPORT TO: **SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024**

SUBJECT: **MORAY TOWN CENTRE HEALTH CHECK 2023**

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

1.   REASON FOR REPORT

1.1   To report the key findings of the Moray Town Centre Health Check 2023 and to ask Council to consider adopting the Moray Town Centre Health Check Report 2023 as a material consideration in future retail planning policy and planning application decision making.

1.2   This report is submitted to Council in terms of Section III (E) (2) of the Council's Scheme of Administration relating to the review or preparation of Local Development Plan and is presented to Council for efficiency to allow consideration prior to the Local Development Plan Evidence Report.

2.   RECOMMENDATION

2.1   **It is recommended that Council agree to:**

   (i)   **note the findings of the Moray Town Centre Health Check Report 2023 and the first town centre perception survey;**

   (ii)   **adopt the Moray Town Centre Health Check Report 2023, as set out in Appendix 1, as a material consideration in future retail planning policy and planning application decision making from 30th April 2024;**

   (iii)   **the publication of the Town Centre Health Check Report 2023 on the Planning and Development website pages; and**

   (iv)   **note the ongoing work to source town centre footfall counters.**

3.   BACKGROUND

3.1   Town centre audits or health checks are important to provide an evidence base of the strengths, vitality and viability, weaknesses and resilience of our town centres. This evidence base can be used to inform development plans and decisions on planning applications.

3.2 A Town Centre Health Check Framework was developed in 2010 in conjunction with Hargest Planning Ltd and has been used to prepare biennial health checks since 2010. Assessments are undertaken in the town centres of Elgin, Forres, Keith, Buckie, and Lossiemouth. The Edgar Road area of Elgin is also assessed. Limited audits were also undertaken in Aberlour, Dufftown, Fochabers, and Rothes.

3.3 The 2021 Town Centre Health Check was completed by Hargest Planning Ltd as part of the wider Moray Retail Study 2021. The 2021 Health Check was a year late due to the covid-19 pandemic. As the 2021 data was completed by an external consultant and the data was presented differently to previous health checks figures from the 2018 Health Check have also been provided for comparison.

3.4 The Town Centre Health Check data:

- Provides an evidence base for use in other studies and strategies;
- Supports the preparation and implementation of the Local Development Plan and economic development policies; and
- Provides a baseline for assessing the impacts of proposed regeneration projects.

3.5 The principal sources of information used for gathering data are field surveys undertaken during summer 2023 to record the occupier of units and the type of use (Space In Use Survey). This allows assessment against three key vitality and viability indicators: diversity of uses, vacancy rates, and retail representation.

3.6 Data on the perception of town centres was gathered through an online survey in December 2023 by Moray Council Research and Information Officers. This survey asked people six questions including which town centre the response related to, rating of various aspects of the town centre, reasons for visiting the town centre, what needs improving and a free-text question for comments. The survey results were collated by the Research and Information team and incorporated into the 2023 Town Centre Health Check. The town centre perception survey will be repeated annually.

3.7 Previous health checks have included an assessment of pedestrian flow. It was not possible to assess pedestrian flow in 2023 due to the unreliability of the automatic counters that were in place. These have been subject to vandalism and faults which meant there was insufficient data to allow competent assessment of pedestrian activity. Monitoring of pedestrian activity was passed to Strategic Planning and Development in October 2023. Options are now being actively explored for more reliable ways to monitor pedestrian activity. Options explored include street light mounted technology with the potential for this to undertake traffic counts and monitor environmental conditions. Retailer intentions, rate and yield data, consumer surveys and turnover indicators have not been monitored due to the scale and cost of undertaking the survey, the need for specialist consultants and the lack of response in previous studies.

4.   MORAY TOWN CENTRE HEALTH CHECK 2023

4.1   The summary below provides an overview of the key findings of the health check for 2023. A copy of the full Health Check is included at **Appendix 1**.

ELGIN

4.2   Comparison retailing (i.e. clothes, gifts, furniture, chemists etc.) continues to be the dominant use within Elgin city centre, with leisure uses (i.e. restaurants, cafes, pubs, sports etc.) also making up a large proportion of units. Convenience retailers (i.e. supermarkets, butchers, newsagents etc.) continue to occupy significant floor areas due to large units such as Tesco, Aldi and Marks and Spencer. The city centre has a good mix of independent retailers but is following national trends with a fall in the number of national multiple retailers (e.g. M&Co, Superdrug, and Monsoon have left the town centre).

4.3   The number of vacant units recorded was the highest since biennial health checks commenced in 2010, with the level of vacancies similar to that recorded in 2014. Vacancies increased from 32 recorded by Hargest Planning Ltd in 2021 to 40 which gives a vacancy rate of 16%. Vacancies include the former M&Co, Superdrug, Shoe Zone, the Candy Shop, Ultimate Hair, and the bicycle shop. Long term vacancies include former Junners stores and units within the St Giles Centre.

4.4   The main reason given for visiting Elgin City Centre in the perception survey was shopping followed by work. Elgin had the lowest overall rating in the town centre perception study. It scored poorly on retail offering, evening economy, daytime events, pleasant/attractiveness, public transport access and cleanliness. Key improvements identified by respondents were shopping with car parking, cleanliness, restaurants/cafes, and events also identified by a significant number of respondents.

EDGAR ROAD

4.5   At Edgar Road national multiples continue to be dominant within the two retail parks. Vacancies have decreased from 7 to 5 since 2018. All the vacancies are within Elgin Retail Park. Since the survey was completed Pure Gym and Chest Heart and Stroke shop have opened which will further reduce vacancy levels.

FORRES

4.6   Comparison retailing and retail services are the dominant use within Forres town centre but leisure uses also make a significant contribution. Retail services (i.e. salons, post office, dry cleaners etc.) have continued to increase. The number of vacant units identified was 18, which is a vacancy rate of 16.2%. This is the highest vacancy rate recorded since biennial town centre health checks started in 2010. This is an increase from 12 recorded by Hargest Planning Ltd in 2021 and a substantial increase from the three recorded in 2018 by planning officers. Notable new vacancies since 2018 include Washingtons, Sues's News, Stuart Cycles, Lees Wealth Management and Ladbrokes. Non-retail vacancies and the appearance of buildings impacts negatively on the perception of the health of the town centre.

4.7   Shopping was identified in the town centre perception survey as the main reason for visiting Forres town centre. Respondents rated Forres well for access by active travel, access by car, accessible for all and safety but was rated more poorly for the retail offering, evening economy and daytime events. Key improvements identified by respondents were shopping and events.

KEITH

4.8   Vitality and viability indicators in Keith have been relatively steady with the mix of uses remaining largely the same and a decrease in vacancies noted. Keith has a strong independent sector with the majority of shops being local stores with a distinct identity. Seven vacant units were identified which is a vacancy rate of 8.5% - this is lower than the 10% average used in Scotland to indicate the relative health of a town centre. However, non-retail vacancies and the condition of some buildings have a negative perception of the town centre for example the former Council Access Point and old Bank of Scotland.

4.9   In the town centre perception survey shopping was identified as the main reason for visiting Keith town centre. Respondents rated the evening economy, daytime events and pleasant/attractiveness poorly. Key improvements identified by respondents include shopping, cleanliness and events.

BUCKIE

4.10   Buckie town centre has a good mix of uses with comparison being dominant but with reasonable levels of convenience and retail services. National multiples, M&Co and RS Mcoll, have left the town centre with the centre primarily made up of independent retailers. The number of vacant units identified was 11, which is a vacancy rate of 14%. This is one unit higher than 2018 and is above the 10% commonly used in Scotland to indicate the relative health of a town centre. Vacancies include M&Co, RS Mcolls, Curiosities, and Master Phones and Vapes.

4.11   In the town centre perception survey shopping was identified as the main reason for visiting Buckie town centre followed by work. Respondents rated the retail offering, evening economy and daytime events poorly. Key improvements identified include shopping, restaurants/cafes and events.

LOSSIEMOUTH

4.12   Leisure continues to be the dominant use in Lossiemouth with reasonable levels of comparison and retail services identified. Five vacant units were identified, which is a vacancy rate of 9%. Vacancies include D&I Tropical, an optician on Queen Street and the former Co-op store that was vacated when the store moved to James Square.

4.13   Shopping was identified as the main reason for visiting Lossiemouth town centre with leisure and socialising also featuring strongly. Respondents rated the evening economy and daytime events poorly but rated safety highly. Key improvements identified by respondents included shopping, events and night life.

SMALLER SETTLEMENTS (ABERLOUR, DUFFTOWN, FOCHABERS, AND ROTHES)

4.14 A significant proportion of the uses in the centre of Moray's smaller towns are Leisure Services (pubs, cafes, restaurants, hotels, sports facilities etc.), with Comparison and Retail Services also contributing to the mix. Convenience shopping needs are provided for by a number of smaller stores, such as the Co-operative stores in Aberlour, Dufftown and Fochabers. Rothes is serviced by a Keystore and Morrisons. No vacancies were identified in Aberlour, three in Fochabers, and five in both Dufftown and Rothes.

4.15 The town centre perception survey included Aberlour and Dufftown, although the low level of response (less than 10 for each town) is noted. Shopping and work were identified as the main reason for visiting these towns. Overall Aberlour scored well with only daytime events and access by public transport scoring averagely. Respondents rating Dufftown scored the retail offering, evening economy, access by public transport and pleasant/attractiveness poorly. Key improvements identified for Aberlour include public transport and night life. In Dufftown shopping, events and restaurants/cafes were rated highly for improvement.

5.   SUMMARY OF IMPLICATIONS

(a)   Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))
Maintaining vital and viable high streets and town centres supports a growing, diverse and sustainable economy. The town centre health check can provide an evidence base for the development of policies and strategies to support town centres.

(b)   Policy and Legal
If approved the Moray Town Centre Health Check Report 2023 would be a material consideration in any relevant future planning applications.

(c)   Financial implications
None.

(d)   Risk Implications
The risk of not monitoring the health of town centres would be an out-of-date evidence base being used for preparing strategies and the Local Development Plan.

(e)   Staffing Implications
The field studies and analysis of space in use was completed by Planning Officers assisted by an intern from the Career Ready programme. The Town Centre Perception Survey was undertaken by Research and Information Officers.

(f)   Property
None

(g)   Equalities/Socio Economic Impact

There are no direct implications arising from this report.

(h) Climate Change and Biodiversity Impacts
Town centres are often the most accessible by public and active travel options. Successful and thriving town centres that provide a range of services and social opportunities can help to reduce the need to travel by car and support walkable neighbourhoods. Making best use of existing town centre infrastructure including reuse and regeneration of existing buildings is preferable to demolition from an embodied carbon perspective.

(i) Consultations
Consultation has taken place with the Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, Head of Governance, Strategy and Performance, the Legal Services Manager, Democratic Services Manager, the Chief Financial Officer the Principal Climate Change Officer, and the Equal Opportunities Officer.

6. CONCLUSION

6.1 Town Centre Health Checks have been undertaken every two years since 2010 (with the exception of 2020 when the health check was delayed due to Covid-19 restrictions). This has allowed various indicators to be monitored over time and data to be used as an evidence base for developing policy and strategies to support town centres. Vacant retail units have increased in all towns with the exception of Keith and Aberlour. The national trend of national multiple retailers moving out of town centres has continued.

6.2 It is recommended that Council note the findings of the Health Check 2023 and adopt the Moray Town Centre Health Check Report 2023 as a material consideration in future planning policy and planning application decision making.

Author of Report: Rowena MacDougall, Senior Planning Officer, Strategic Planning and Development
Background Papers:
Ref: SPMAN-813460984-492

Moray Town Centre

Health Check Assessment
2023

TOWN CENTRE
HEALTHCHECK

Executive Summary

In 2023, Moray Council undertook a series of Town Centre Health Check assessments.

Assessments were undertaken in the town centres of Elgin, Forres, Buckie, Keith and Lossiemouth. The Edgar Road area of Elgin is also assessed. Limited assessment was undertaken in Aberlour, Dufftown, Fochabers and Rothes.

A Town Centre Perception Survey was also completed in December 2023 for Elgin, Buckie, Keith, Forres, Lossiemouth, Dufftown and Aberlour. The results are shown in section 11.

The report does not seek to provide an interpretation of the information obtained- its role is to provide the base information for other studies/analysis to interpret.

Summary Table of Key Findings

A summary table of key findings is set out below.

Town	Comparison		Convenience		Retail Service		Leisure Service		Vacancy		Vacancy Rate	
	2023	2021	2023	2021	2023	2021	2023	2021	2023	2021	2023	2021
Elgin	73	82	18	16	46	55	70	61	40	32	16%	
Edgar Road	20	21	3	2	4	2	3	4	5	7		
Forres	31	29	15	11	24	18	23	21	18	12	16.2%	.
Keith	27	23	12	11	18	14	18	15	7	12	7%	
Buckie	25	27	7	12	17	11	20	23	11	6	13.7%	
Lossiemouth	11	11	8	8	11	12	21	21	5	1	9%	
	2023	2018	2023	2018	2023	2018	2023	2018	2023	2018	2023	2018
Aberlour	5	7	4	4	5	5	13	10	0	0		
Dufftown	10	7	3	7	8	4	17	19	5	2		
Fochabers	8	9	4	4	2	2	9	9	3	1		
Rothes	3	6	3	3	3	2	9	9	5	3		

2

2.   Vitality & Viability Indicators

This analysis focuses on an assessment of the performance of the 'town centres' of Elgin (and also Edgar Road), Forres, Keith, Buckie and Lossiemouth. In addition, limited audits were carried out for Aberlour, Dufftown, Fochabers and Rothes.

'Vitality' is a measure of how lively and busy a town centre is. 'Viability' is a measure of capacity to attract ongoing investment for maintenance, improvement, and adaptation to changing needs. Together these measures give an indication of the health of a town centre and, when used consistently over a period of time can demonstrate changes in performance.

A brief description of key Vitality and Viability Indicators assessed in this report are provided below.

Diversity of Uses surveys have been undertaken, which comprise an analysis of the mix of uses within the centres and the quantum of floor space they occupy. A table showing GOAD categories is included in Appendix III.

Retailer representation is a recording and assessment of those retailers located within the town centre in terms of identity and type (e.g. multiple or independent retailers).

Vacancy rates can be defined as either the number of units or amount of vacant floor space not in occupation, expressed as a percentage of the total number of retail units or floor space in a centre. Vacancies are measured for vacant Comparison, Convenience, Retail Services and Leisure Services only. A measurement of the length of retail frontage that is vacant is also given. This is an indicator of the impact that vacancies have on the appearance and feel of a centre.

Pedestrian Flow – It was not possible to assess pedestrian flow in 2023 due to a lack of reliable data from automatic counters.

3.   Moray Retail Study 2021

The 2021 Audit was not completed by Moray Council Planning Officers and was undertaken by Hargest Planning Ltd. as part of the wider Moray Retail Study 2021. Whilst a similar methodology was used there were some differences in how the results were presented. Therefore, some sections refer to changes since the last time MC Planning Officers completed the Town Centre Health Check.

4.   Elgin Town Centre Health Check

Since 2018 there have been a number of notable changes across the city centre these include M&Co, Superdrug, Car Phone Warehouse, Shoe Zone, Monsoon and William Hill closing resulting in vacant units during the 2023 assessment. Mountain Warehouse also moved from the centre to Edgar Road creating a vacancy in the St Giles Centre. Other vacancies since 2018 include the bicycle shop and café Muse, Fiona Macleod Hairdressers, the Candy Shop, Ultimate Hair and Beauty, Fones n PCs, and Elgin Community Surgery. Starbucks moving into the former Burton unit has also resulted in a new vacancy on the north of the High Street. Across the city centre there have been a number of vacant units

reoccupied including Thorntons by Highland Mobiles and The Bosie moving into the unit vacated by Highland Mobiles. The Deli Nextdoor occupied the former Edinburgh Wool Mill and Nelly Bo's moved into the former Clarks store. Elgin Nail Spa have occupied a long-term empty unit. Highland Bikes, Toytoon, Murray Travel and the Cocktail Joint have also occupied vacant units.

The number of vacant units within Elgin City Centre are the highest since the biennial Town Centre Health Checks commenced in 2010. The level of vacancies is at a level similar to that recorded in 2014.

Diversity of Uses

Survey of the town centre indicates a wide range of different uses and types of property.

The dominant use within Elgin town centre continues to be Comparison retailing (e.g. clothing; footwear; electrical goods etc.). There is also a significant proportion of Retail Services within the town centre (e.g. hairdressers; beauticians; travel agents) and Leisure Services (e.g. hotels; pubs; restaurants; cinemas). There are a smaller proportion of Convenience shops (e.g. supermarkets; grocery stores etc.) but some of these have large floor areas e.g. Tesco. The town centre includes a range of other local businesses predominantly in the Financial and Business Services sector such as solicitors, accountants, and property agents.

The overall mix of uses and the quantum of floor space they occupy is summarised in the table below with the 2021 results completed by Hargest Planning Ltd as part of the Moray Retail Study and the audit completed by the Council in 2018.

Elgin- Diversity of Uses

Summary of Elgin Diversity of Uses Survey						
	2023		2021 (Completed by Hargest Planning Ltd)		2018	
Type of Use	No. of Outlets	Floor space (sqm)	No. Of Outlets	Floor space (sqm)	No. Of Outlets	Floor space (sqm)
Comparison	73	18847.4	82	28338	90	24299.9
Convenience	18	15440.1	16	10293	19	15728.3
Retail Service	46	4503.4	55	17460	51	4846.5
Leisure Service	70	17392.9	61		65	16331.6*
Financial & Business Service	38	7760.4	26		38	8141.4
Health & Medical	9				11	
Public Service	26				25	
Religious Service	6				5	
General Office Use	24				30	
Vacancy*	40	8986.6	32	6546	25	6127.3*
Total	350	72930.8			359	75475

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

There have been some changes to the categorisation of certain uses to improve consistency between towns. These adjustments as the study progresses account for some of the differences between categories.

Retailer Representation

There are WH Smith, The Works, Trespass, Costa, Starbucks, Farmfoods, TK Maxx national multiple retailers located within Elgin, including Marks & Spencer, and Boots. Site surveys revealed 46 national (Scottish/UK) comparison, convenience, and retail service outlets multiples in the town centre. This is a reduction since 2018 when 54 were recorded. This reflects national trends with large multiple national retailers reducing High Street presence and consolidating this in fewer stores.

In addition to the multiple retailers, the town centre has a good provision of independent/specialist retailers. South Street, Batchen Street and Commerce Street accommodate a collection of independent stores in smaller retail units providing a more bespoke range of services. Since 2018 there has been a growing trend of independent retailers occupying High Street vacancies however this tends to be smaller units on the edge or outwith the Core Retail Area.

Within the defined town centre boundary there are a number of food stores, the largest of which are Tesco on Blackfriars Road, Marks & Spencer's store on High Street and an Aldi store. Both Tesco and M&S have a substantial portion of floor space for Comparison goods as well as Convenience. This has all been classed as 'Convenience' floor space above.

Seven units in the town centre were identified to be charity shops. This is the same level as 2018.

Elgin city centre has one betting office and the only unit resembling a high interest money lender is Ramsden who offer pawnbroking loans.

There are 16 takeaways within the centre which is 6.5% of the total comparison, convenience, retail service and leisure service units. This figure does not include restaurants or cafes which offer a takeaway service in addition to the "sit in" offer.

Vacancy Rate

A site survey by Moray Council planning staff during summer 2023, confirmed the number of vacant units stood at 40[1]. Vacancies account for 16% of the total number of Comparison, Convenience, Retail and Leisure Service units within the centre. This is a significant increase from 2021 when 32 units were recorded. As a rule of thumb 10% is used in Scotland to indicate the relative health of a town centre.

New vacancies since 2018 include national retailers such as M&Co, Superdrug, Car Phone Warehouse, Shoe Zone, Monsoon and William Hill. There are a number of units which have remained vacant for several years including 186 and 188 High Street, 57-61 South Street (Old Junners) and 63 South Street. Within the St Giles Centre there is a notably high level of vacancies, this is the highest level recorded since 2010.

Floor space data indicates that there is approximately 72930sq. m of vacant floor space within Elgin town centre. There is approximately 146m of vacant retail frontage in the town centre (figure obtained by scaling off OS-base plans). This figure equates to approximately

11% of the retail frontage of the traditional shopping streets in the town centre- (e.g. the core retail area of High Street; Commerce Street; Batchen Street; South Street and Thunderton Place). This increase from 110m in 2018.

5. Edgar Road Health Check

Although not part of Elgin town centre, the Edgar Road area (including the Elgin Retail Park and Springfield Retail Park) is a major commercial centre and a key focus for substantial retail activity. Changes since 2018 have included Mountain Warehouse moving into the former New Look Store, Food Warehouse opening and the NHS using one of the units at Elgin Retail Park as a vaccination centre.

Diversity of Uses

Information on the retail mix of the Edgar Road area of Elgin is set out below. The dominant use is Comparison retailing. Only a small number of units are for Convenience goods, but these include Asda, the Food Warehouse and Allarburn Dairy which make up a significant proportion of the area's floor space.

Edgar Road Diversity of Uses

	Summary of Edgar Road Diversity of Uses Survey			
	2023		2018	
Type of Use	No. of Outlets	Floor space (sqm)	No. of Outlets	Floor space (sqm)
Comparison	20	21699.8	21	21171.76
Convenience	3	13325.86	2	12386.8
Retail Service	4	1481.3	2	547.2
Leisure Service	3	665.7	4	1182.06
Financial & Business Service	3	1232.5	3	1232.5
Health & Medical	2		1	
Public Service	1		1	
Religious Service			0	
General Office Use			0	
Vacancy	5	3050.21	7	4247.44
Total	42	41455	41	40767.76

Retailer Representation

There are 21 national (Scottish/UK) multiples in the Edgar Road Area, and they are the dominant use within the Springfield and Elgin Retail Parks.

Vacancy Rates

The number of vacant units identified by Moray Council planning staff was five, which is a decrease of two unit compared to 2018. Floor space data obtained from previous planning application documents indicates that there is approximately 3050 sqm of vacant floor space in the Edgar Road area.   All of the Lithe vacant units are within the Elgin Retail Park.

6.   Forres Town Centre Health Check

Forres is historically an important town centre for the local community and the tourist economy. There are clear strengths within the centre. The Conservation Area creates a pleasing-built realm for shoppers however the deterioration of some properties effects perceptions of the town centres health. Forres town centre provides a good range of convenience goods shopping (including the Co-operative store on High Street) and reasonable range of comparison goods shops.

The biggest change across the High Street has been an increase in cafes and restaurants with new occupiers such as Café 1496, Forres Tandoori and The Wok Inn. There is also an increase in the number of home décor and gift shops including Home Comforts, Finishing Touches and The Tortoise Workshop. Other new occupiers have included MacGregor Memorials, Alberto Ricci, Murray Travel and Julie's pet Grooming. However, vacancies have increased to eighteen units, with few of these being the same as previous years. The condition of some of the longer-term vacant units has a negative impact on the perceptions of the town's health.

Diversity of Uses

Information on the retail mix of Forres town centre is set out below. The dominant uses within Forres are Comparison retailing (e.g. clothing and footwear) with significant numbers of Retail and Leisure Services (e.g. hairdressers; cafes; travel agents; pubs etc.). Forres town centre provides a range of Convenience shopping however Tesco and Lidl have developed out of centre. There is also a significant number of Leisure and Public Services located within Forres town centre.

The overall mix of uses and the quantum of floor space they occupy is summarised in the table below.

Diversity of Uses Forres

Summary of Forres Diversity of Uses Survey						
	2023		**2021** (Completed by Hargest Planning Ltd)		**2018**	
Type of Use	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**
Comparison	31	5067.9	29	4455	28	4714.8
Convenience	15	1933	11	1840	15	2268.9
Retail Service	24	1683	18	4591	27	2489.6
Leisure Service	23*	1232.6	21*		23	1292.3
Financial & Business Service	9	3410.7	8		14	4491.1
Health & Medical	4		-		5	
Public Service	10		-		14	
Religious Service	3		-		3	
General Office Use	4		-		6	
Vacancy*	18	1758.1	12	1084	3	834.7
Total	**141**	**150853**			**138**	**16091.4**

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Retailer Representation

There are 14 national (Scottish/UK) multiples including Boots and Co-op in the town centre. Five units within the town centre were identified to be charity shops which is comparable to 2018. Much of Forres's character comes from its independent retail provision.

No betting offices or high interest money lending were identified during the assessment.

There are seven takeaways within the centre which is 6.3% of the total comparison, convenience, retail service and leisure service units. This figure does not include restaurants or cafes which offer a takeaway service in addition to the "sit in" offer.

Vacancy Rates

The number of vacant units identified was 18, which is a vacancy rate of 16.2%, this is highest vacancy rate recorded since biennial town centre health checks started in 2010. This is an increase from 2021 recorded by Hargest Planning Ltd in 2021 and a substantial increase from the three recorded in 2018 by planning officers. Notable new vacancies since 2018 include Washingtons, Sues's News, Stuart Cycle, Lees Wealth Management and Ladbrokes. Non-retail vacancies and the appearance of buildings impacts negatively on the perception of the health of the town centre.

Floor space data indicates that there is approximately 1758sqm of vacant floor space in Forres town centre. Again, this is a substantial increase from just 305sqm in 2018. There is approximately 67m of vacant retail frontage in the town centre (figure obtained by scaling off OS-base plans). This figure equates to approximately 9% of the retail frontage of the traditional shopping streets in the town centre- (e.g. the core retail area of High Street and Tolbooth Street). This is almost double the 2018 measurement of 35m.

7.   Keith Town Centre Health Check

Keith has shown improved signs of vitality plus viability with vacancy levels relatively steady and new occupancy of shops. Examples include Inspired Living occupying the former Third Brothers unit, Kelpie Games occupying the former Be So Crafty shop, Blue Violet occupying the former Maid by Grandma shop, a cleaning company occupying the former Clark Thomson insurance brokers and Gray's of Keith being reoccupied by antique store. Noticeable non- retail vacancies include the former Council Access point office, and Bank of Scotland.

Diversity of Uses

Information on the retail mix of the town centre is set out below. The dominant use within the town centre is Comparison shops with Convenience and Retail Services also contributing significantly to the mix of uses.

Summary of Keith Diversity of Uses Survey						
	2023		2021 (Completed by Hargest Planning Ltd)		2018	
Type of Use	No. of Outlets	Floor space (sqm)	No. of Outlets	Floor space (sqm)	No. of Outlets	Floor space (sqm)
Comparison	27	5373.7	23	4051	26	4497.9
Convenience	12	1393.5	11	1497	13	1422.7
Retail Service	18	1305.9	14	3951	13	1026.10
Leisure Service	18	1028.8	15		19	910.9
Financial & Business Service	9	1220	8		11	1191.2
Health & Medical	1				1	
Public Service					1	
Religious Service	1				1	
General Office Use	3				5	
Vacancy*	7	706	12	1925	9	1688.6
Total	96	11027.9			99	10737.4
Notes:						

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Retailer Representation

There are seven national (Scottish/UK) multiples including Spar and Harry Gows in the town centre which is comparable to 2018. Keith has a strong independent sector with the majority of shops being local stores with a distinct identity. Two units within the town centre were identified to be charity shops and this is the same as 2018.

No betting offices or high interest money lending were identified during the assessment.

There are 5 takeaways within the centre which is 6% of the total comparison, convenience, retail service and leisure service units. This figure does not include restaurants or cafes which offer a takeaway service in addition to the "sit in" offer.

Vacancy Rate

The number of vacant units identified was seven, which is a vacancy rate of 8.5% - this is lower than the 10% average used in Scotland to indicate the relative health of a town centre. This lower that the vacancies in 2021 and 2018 when vacancies of 12 and 9 were recorded respectively.

Floor space data indicates that there is approximately 771.3sqm of vacant floor space in Keith. There is approximately 58.5m of vacant retail frontage in the town centre (figure obtained by scaling off OS-base plans). This figure equates to approximately 6% of the retail frontage on the traditional shopping street in Keith, which is Mid Street. This is a decrease from 96m reported in 2018.

8.   Buckie Town Centre Health Check

In Buckie there have been several changes across the town centre since 2018, including closure of M&Co and Rs McColl's. Curiosities and Master Phones and Vapes closing also resulted in vacancies. Bank closures have also impacted on the town centre.

Diversity of Uses

Information on the retail mix of Buckie town centre is set out below. The dominant use is Comparison retailing. There is a reasonable range of Convenience shopping and a good range of Retail Services available for a town of this size. The overall mix of uses and the quantum of floor space they occupy is summarised below.

Buckie Diversity of Uses

Summary of Buckie Diversity of Uses Survey						
	2023		2021 (Completed by Hargest Planning Ltd)		2018	
Type of Use	No. of Outlets	Floor space (sqm)	No. of Outlets	Floor space (sqm)	No. of Outlets	Floor space (sqm)
Comparison	24	4413	27	6161	27	4963.5
Convenience	7	2243.9	12	3413	8	2267.8
Retail Service	17	1584.1	11	4693	16	1533.5
Leisure Service	20	2437.9	23		20	2235.7
Financial & Business	8	1391.9	7		10	1603.2

12

Service						
Health & Medical	5				5	
Public Service	9				5	
Religious Service	4				4	
General Office Use					2	
Vacancy*	11	1928	6	724	10	610.9
Total	105	13871.8			107	14402.5

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Retailer Representation

There are 11 national retail goods/services shops (Scottish/UK) including Co-op, Savers, and Hays Travel multiples in the town centre. This is drop from 13 in 2018. Three units were identified to be charity shops which is the same as 2018.

One betting office was identified in the assessment. No high interest money lending units were identified.

There are seven takeaways within the centre which is 8.7% of the total comparison, convenience, retail service and leisure service units. This figure does not include restaurants or cafes which offer a takeaway service in addition to the "sit in" offer.

Vacancy Rate

The number of vacant units identified was 11, which is a vacancy rate of 14%. This is one unit higher than 2018 and is above the 10% commonly used in Scotland to indicate the relative health of a town centre.

Floor space data indicates that there is approximately 1928sqm of vacant floor space in Buckie town centre. There has been an increase in the vacant floor space. There is approximately 87m of vacant retail frontage in the town centre (figure obtained by scaling off OS-base plans). This is a small decrease compared to 2018 when 89m was measured. This figure equates to approximately 9% of the retail frontage of the traditional shopping streets in the town centre (e.g. the core retail area of East Church Street; West Church Street and High Street).

9. Lossiemouth Town Centre Health Check

There are few national multiple retailers and independent retailers predominate in Lossiemouth. In addition to retailing the centre is also a popular destination for tourists with a number of buildings offering tourist attractions. Convenience shopping needs are provided for by a number of smaller store units within the wider town centre. Otherwise, the depth of goods on offer in the centre is somewhat limited. The number of vacant units identified was five.

Diversity of Uses

Lossiemouth does not contain a defined 'town centre', within the Moray Local Development Plan 2020 however the map of the study area used in 2010 has been used to define the boundaries for the survey. This can be found below (*Map 1*).
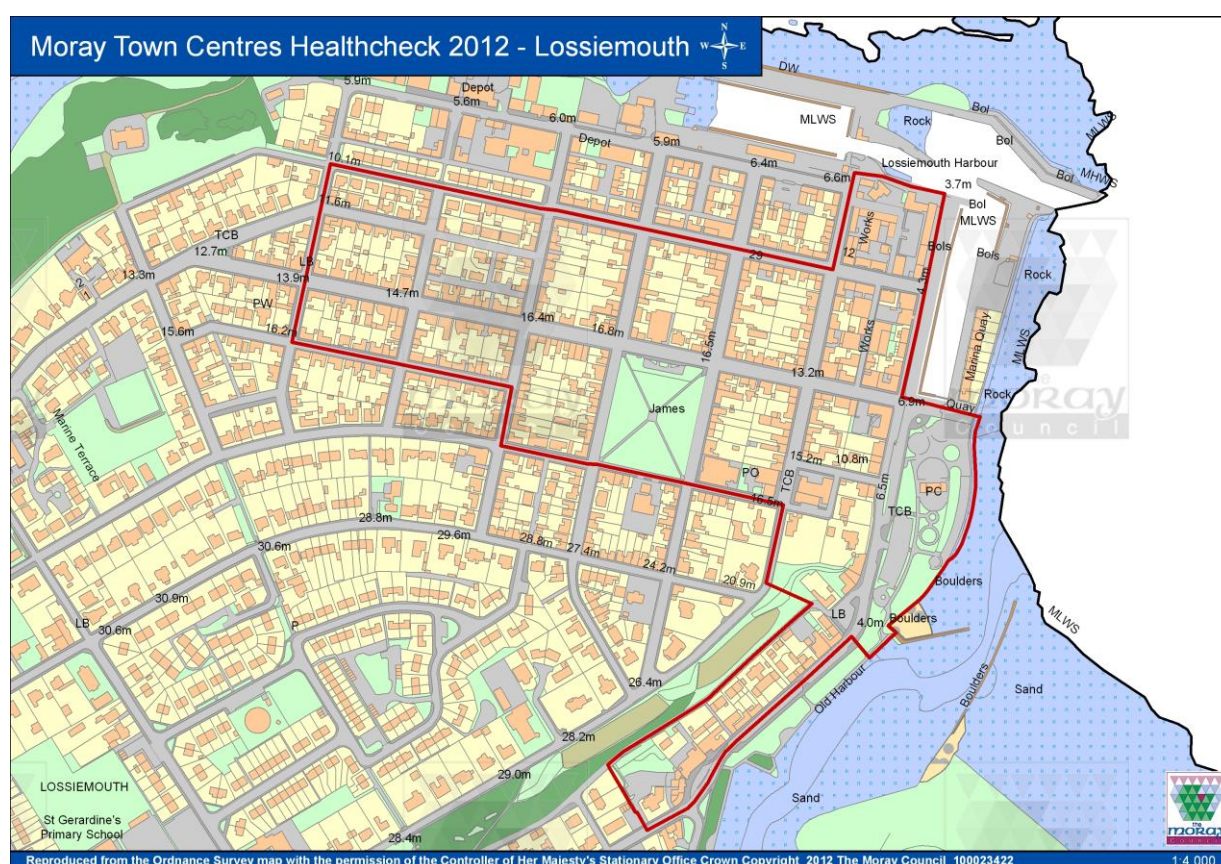
Moray Town Centres Healthcheck 2012 - Lossiemouth

The overall mix of uses and the quantum of floor space they occupy is summarised in the table below.

Lossiemouth Diversity of Uses

Summary of Lossiemouth Diversity of Uses Survey						
	2023		**2021** (Completed by Hargest Planning Ltd)		**2018**	
Type of Use	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**
Comparison	11	907.9	11	882	10	2164.7
Convenience	8	1841.3	8	989	6	576
Retail Service	11	775.4	12	3404	12	933.1
Leisure Service	21	2531.7	21		21	1639
Financial & Business Service	3	611.7	2		4	816.5
Health & Medical	2				2	
Public Service	3				5	
Religious Service	1				2	
General Office Use	1				1	
Vacancy*	5	600.5	1	81	5	225.8
Total	**61**	**7154.3**			**68**	**6355.1**

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Retailer Representation

There are two national retail goods/service shops (Scottish/UK) multiples including Co-op and Right Medicine in the town centre which is comparable to 2018. There are no charity shops, betting shops or high interest lenders.

There are seven takeaways within the centre which is 12% of the total comparison, convenience, retail service and leisure service units. This perhaps reflects the concentration of tourism facilities in Lossiemouth and also the extensive town centre boundary due to the concentration of uses on Clifton Road and along Queen Street. This figure does not include restaurants or cafes which offer a takeaway service in addition to the "sit in" offer.

Vacancy Rate

The number of vacant units identified by Moray Council planning staff was five, which is a vacancy rate of 9%. This is an increase from 1 identified by Hargest Planning Ltd in 2021 but the same as identified by Moray Council planning staff in 2018. This is below the 10% rule of thumb used in Scotland to indicate the relative health of a town centre. New vacancies include D&I Tropical, opticians on Queen Street, and the former Co-op which was vacated when the store moved to St James Square.

Floor space data obtained from the Regional Assessor indicates that there is approximately 600sqm of vacant floor space in the Lossiemouth study area. This is a significant increase compared to the floor area in 2018 and likely due to the former Co-op unit becoming vacant when the store moved.

10.   Smaller Settlements Health Check

Limited health check assessments were carried out for Aberlour, Dufftown, Fochabers and Rothes. The following Vitality and Viability Indicators have been examined for these areas: Diversity of Uses; Retailer Representation; and Vacancy Rates.

Diversity of Uses

The overall mix of uses and the quantum of floor space is summarised in the table below along with the 2018 results. It is notable that Dufftown has 17 Leisure Service outlets (e.g. restaurants, cafes, hotels, and guesthouses etc). This illustrates the importance of tourism to the centre.

Other than specialist stores the main-stream comparison retail range in these smaller settlements is very limited. Convenience shopping needs are provided for by a number of smaller stores, such as the Co-operative stores in Aberlour, Dufftown and Fochabers. Rothes is serviced by a Keystore and Morrisons.

16

Aberlour Diversity of Uses

Summary of Aberlour Diversity of Uses Survey				
	2023		**2018**	
Type of Use	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**
Comparison	5	327	7	613
Convenience	4	666.7	4	666.7
Retail Service	5	1719.9	5	1665.2
Leisure Service	13	806.3	10	572.9
Financial & Business Service	3	286.1	2	191.1
Health & Medical	2		2	
Public Service	4		4	
Religious Service	1		1	
General Office Use			0	
Vacancy*	0		1	70.1
Total	**37**	**3806**	**36**	**3779**

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Dufftown Diversity of Uses

Summary of Dufftown Diversity of Uses Survey				
	2023		**2018**	
Type of Use	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**
Comparison	10	399.3	7	291.8
Convenience	3	607.5	7	825.7
Retail Service	8	603.5	4	599.2
Leisure Service	17	1174	19	1403.5
Financial & Business Service	4	912.2	4	881.5
Health & Medical				
Public Service	3		3	
Religious Service				
General Office Use	1			
Vacancy*	5	346.1	2	93.8
Total	**51**	**4042.6**	**46**	**4095.5**

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Fochabers Diversity of Uses

Summary of Fochabers Diversity of Uses Survey				
	2023		**2018**	
Type of Use	**No. of Outlets**	**Floor space (sqm)**	**No. of Outlets**	**Floor space (sqm)**
Comparison	8	737.1	9	810.5
Convenience	4	663.7	4	287.5
Retail Service	2	76.5	2	78.5
Leisure Service	9	341.7	9	439.5
Financial & Business Service	1		1	197.8
Health & Medical	1		2	
Public Service	2		2	
Religious Service	1		1	
General Office Use	2		2	
Vacancy*	3	212	1	343.6
Total	**33**	2031	33	2157.4

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Rothes Diversity of Uses

Summary of Rothes Diversity of Uses Survey				
	2023		**2018**	
Type of Use	No. of Outlets	Floor space (sqm)	No. Of Outlets	Floor space (sqm)
Comparison	3	337	6	276
Convenience	3	474.9	3	474.9
Retail Service	3	403.6	2	362.5
Leisure Service	9	104.8	9	153
Financial & Business Service	4	838.1	4	203.6
Health & Medical	1		1	
Public Service	6		6	
Religious Service	1		1	
General Office Use				
Vacancy*	5	433.8	3	275.6
Total	**35**	**2592.2**	**35**	**1745.6**

Notes:

* It should be noted that vacancies are measured for vacant Comparison; Convenience; Retail Service; and Leisure Service outlets only and is based on their last use. Therefore, vacant banks or estate agents are not included.

Retailer Representation

The overall number and percentage of national multiples (Scottish/UK) is summarised below. This relates to retail shops and services.

Smaller Settlements- Retailer Representation

Town	Aberlour	Dufftown	Fochabers	Rothes
No. of National Multiples	1	2	2	2

11.   Town Centre Perception Survey

A total of 646 visitors to seven towns in Moray responded to the online Town Centre Perception Survey in December 2023. The town centres chosen for the survey were Aberlour, Buckie, Dufftown, Elgin, Forres, Keith and Lossiemouth.

The survey asked people six questions: the town centre they wished to respond for, to rate various aspects of the town centre, their reasons for visiting, what needs improving and a free-text question for comments.

The survey permitted more than one response per person in case they wished to respond about more than one town. Note that although 646 responses were received, only 409 unique visits were recorded to the survey page; it is not possible to differentiate between many people using one site (IP address), such as the library or in the same household, or one person responding about more than one town. Each response is therefore considered uniquely.

11.1. Number of responses by town

Towns and responses about them are shown below, along their populations (figure 1). Note that the population is for comparison purposes only.

- Dufftown received a relatively low number of responses compared to its population.

- Not surprisingly most feedback was about Elgin with 449 responses (nearly 70% of the total), over twice as many as the other six towns put together.

The next most popular town for the survey was Forres (14%), followed by Buckie and then Lossiemouth. Aberlour, Dufftown and Keith each received 2% or less of the total.
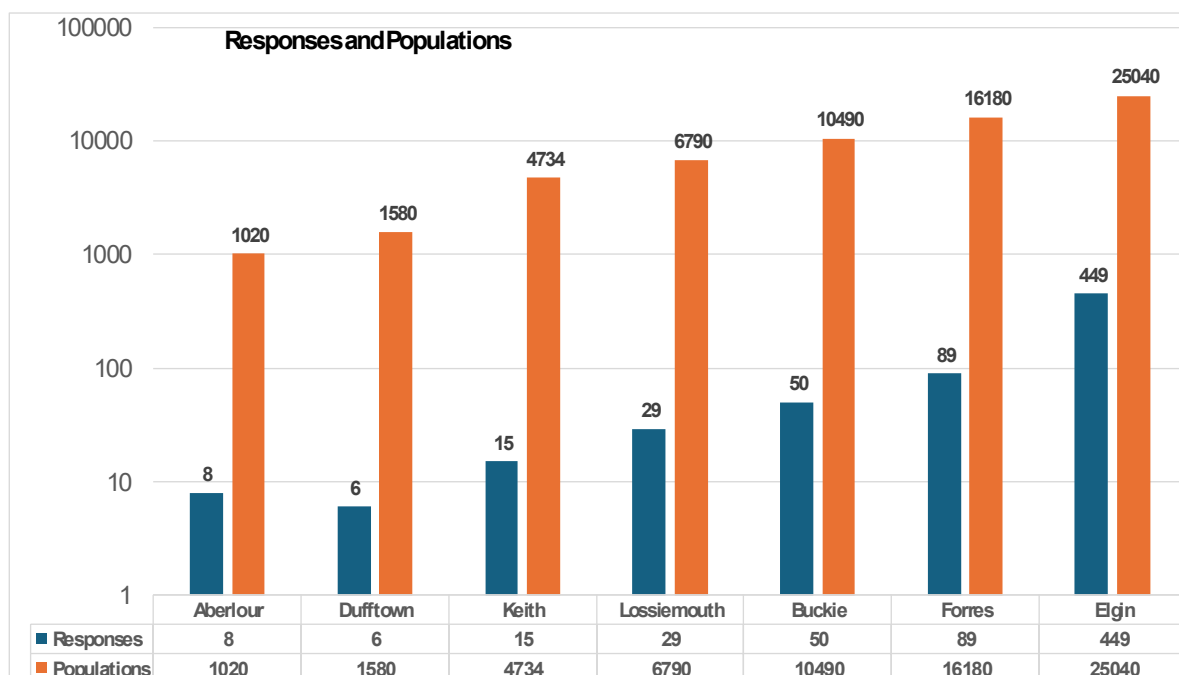

	Aberlour	Dufftown	Keith	Lossiemouth	Buckie	Forres	Elgin
Responses	8	6	15	29	50	89	449
Populations	1020	1580	4734	6790	10490	16180	25040

Figure 1
Population mid-2021 estimates from https://www.citypopulation.de/en/uk/scotland/S12000020__moray/

11.2. Frequency of visits

Question 2 asked how often resondents visit their chosen town. Smaller towns received more frequent visits than larger towns (highlighted blue). Some residents of smaller towns will pay visits to larger towns which could account for Elgin having a spread of frequencies, with an equal number saying they visited daily a few times a month. Except for Elgin, most people said they visited their chosen town centre once a week or more often than once a week.

Frequency	Aberlour	Buckie	Dufftown	Elgin	Forres	Keith	Lossie
Daily	4	22	4	86	23	7	12
A few times a week	1	19	2	147	45	5	10
Once a week	1	7	0	68	13	2	3
A few times a month	1	1	0	86	6	0	2
Monthly	0	1	0	34	0	1	1
Less frequently	1	0	0	28	2	0	1
Total	8	50	6	449	89	15	29

Table 1

11.3. Town Centre Ratings

Question 3 asked people to rate ten aspects of the town centre by giving a score out of five, results shown in Tables 2 and 3.

The 'maximum score' is the greatest possible score which could be received for that town, taking into account the number of respondents for that town. It is calculated as follows. In a theoretical scenario if everyone gave the highest rating for their chosen town centre, that is a score of 5 to each of the 10 aspects, this would give a maximum score of 10 x 5 = 50 points per aspect. This is multiplied by the responses for that town to give the maximum. For instance, 10 x 5 x 50 = 2500 for Buckie, the figure in Table 2.

Table 3 breaks down the aspect by percentage. It is calculated as follows, taking the maximum score per aspect divided by the total responses for the town. For example, public transport in Buckie 142/ ((50 points per aspect) x 50) = 142/500 = 56.8%. The colours of the boxes were decided thus: green for 70% or above (good), orange for 50% and 69% (fair) and red for 50% and below.

The TOTAL for each town in Table 3 was calculated by dividing the TOTAL by the max score in Table 2.

	Aberlour	Buckie	Dufftown	Elgin	Forres	Keith	Lossiemouth
Number of responses	8	50	6	449	89	15	29
Aspect/Max score	2500	300	22450	4450	750	1450	32300
Retail offering	31	103	14	813	213	44	76
Evening economy	24	88	9	1103	209	28	64
Daytime events	20	74	17	898	173	20	40
Pleasance & Attractiveness	29	151	14	841	302	31	87
Access by public transport	22	142	8	1088	250	46	75
Access by active travel	26	159	15	1304	317	38	78
Access by car	31	167	16	1207	334	52	86
Accessible for all	32	175	22	1349	333	52	89
Safety	35	162	18	1289	325	50	104
Cleanliness	34	140	16	1049	309	40	89
TOTAL	284	1361	149	10941	2765	401	788

Table 2 - Scores for the 10 aspects of each town

	Aberlour	Buckie	Dufftown	Elgin	Forres	Keith	Lossiemouth
Number of responses	8	50	6	449	89	15	29
Retail offering	77.5%	41.2%	46.7%	36.2%	47.9%	58.7%	52.4%
Evening economy	60.0%	35.2%	30.0%	49.1%	47.0%	37.3%	44.1%
Daytime events	50.0%	29.6%	56.7%	40.0%	38.9%	26.7%	27.6%
Pleasance & Attractiveness	72.5%	60.4%	46.7%	37.5%	67.9%	41.3%	60.0%
Access by public transport	55.0%	56.8%	26.7%	48.5%	56.2%	61.3%	51.7%
Access by active travel	65.0%	63.6%	50.0%	58.1%	71.2%	50.7%	53.8%
Access by car	77.5%	66.8%	53.3%	53.8%	75.1%	69.3%	59.3%
Accessible for all	80.0%	70.0%	73.3%	60.1%	74.8%	69.3%	61.4%
Safety	87.5%	64.8%	60.0%	57.4%	73.0%	66.7%	71.7%
Cleanliness	85.0%	56.0%	53.3%	46.7%	69.4%	53.3%	61.4%
TOTAL	71.0%	54.4%	49.7%	48.7%	62.1%	53.5%	54.3%

Table 3 - Percentages for each aspect of the towns

Highest	→						Lowest
Aberlour	Forres	Buckie	Lossiemouth	Keith	Dufftown	Elgin
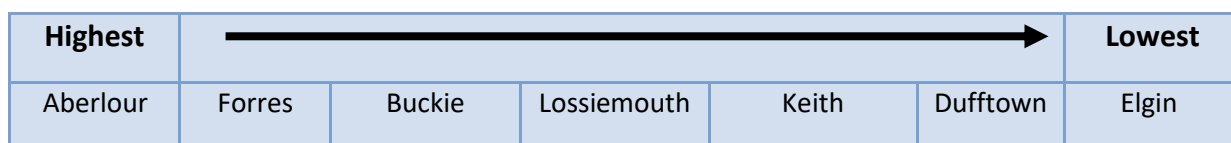
Figure 2

- Aberlour has the highest overall score (71%) although it is noted only eight people responded.
- Elgin had the lowest overall score (48.7%), Lossiemouth in the middle.
- Public transport was rated best in Keith, worst in Elgin.
- No town attained a good score for daytime events although Elgin was the highest after Aberlour.
- None of the towns received a good rating for their evening economy.
- Access by any means of transport was rated highly in Forres.
- Forres and Lossiemouth scored well for safety, Dufftown worst although the response rate was low.
- Accessibility was rated fair or good in all towns.

Note that 'Accessible for all and easy to find your way around' is regarded as getting around once the visitor has arrived in the town centre, as distinct from mode of transport (and how accessible or not that is) to get to the town.

11.4. Main reasons for visiting
Question 4 asked people the main reason for visiting their chosen town centre. The pie chart size reflects the number of responses for the town in figure 3 (table 4 underlying figures).
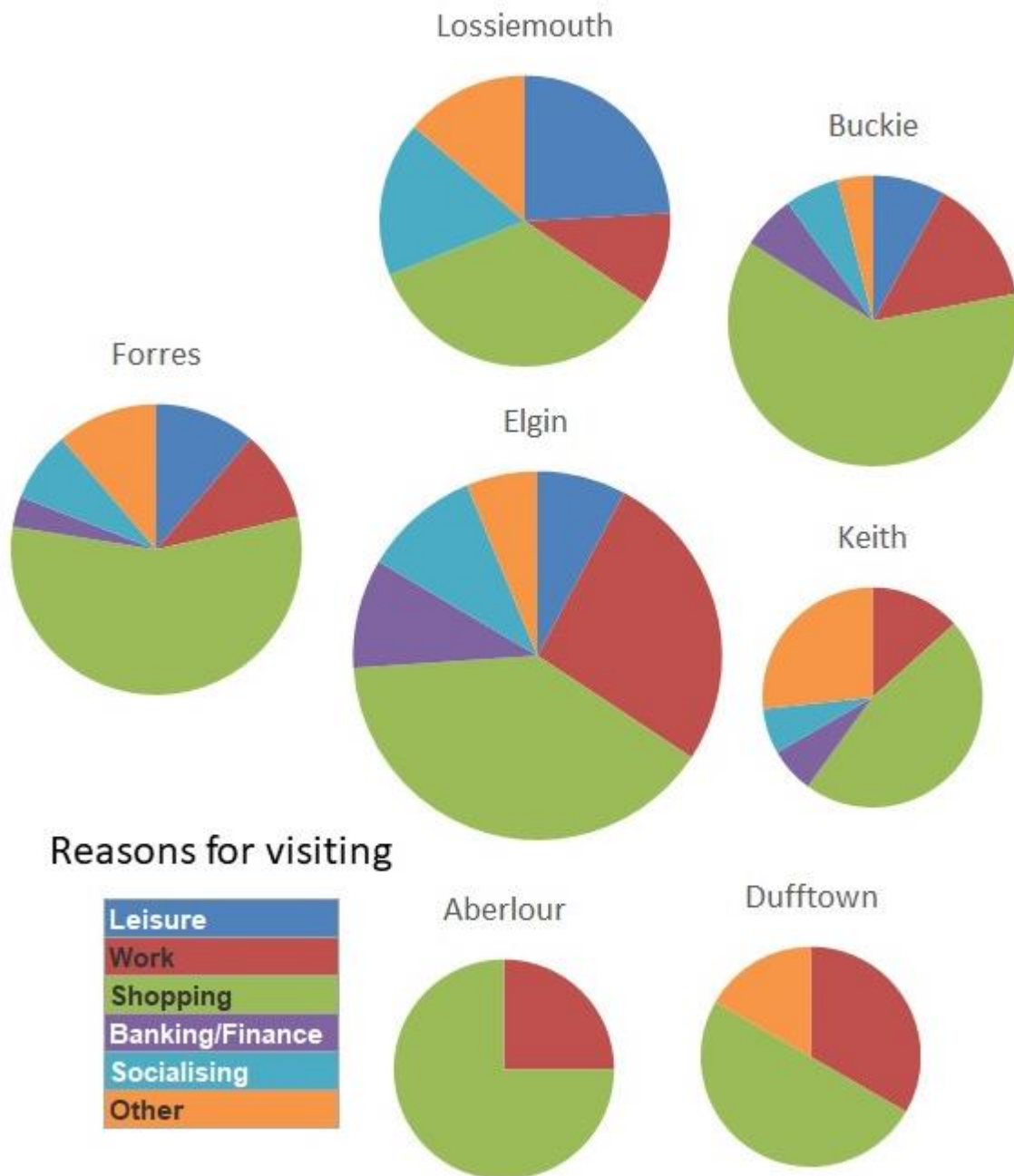
Figure 3

	Aberlour	Buckie	Dufftown	Elgin	Forres	Keith	Lossiemouth	Totals
Leisure	0	4	0	35	10	0	7	56
Work	2	7	2	119	9	2	3	144
Shopping	6	31	3	178	50	7	10	285
Banking/Financ	0	3	0	43	3	1	0	50
Socialising	0	3	0	46	7	1	5	62
Other (please s	0	2	1	28	10	4	4	49
Totals	8	50	6	449	89	15	29	646

Table 4

24

For all seven towns, the main reason for visiting was for shopping. As expected for Elgin being the main centre of employment, the next main reason for visiting was for work. Two of the six respondents for Dufftown said they worked there. Lossiemouth had the most diverse reasons for visiting compared to the other towns.

Twenty people said they visited for 'other' reasons. In order of popularity these 'other' reasons were because they live there, for opticians/dentist checkups and luncheon appointments.

11.5. Improvements

Question five asked people what aspects of the town centre they consider needs improving. As with question four, the results are summarised by pie charts with the data table in figure 4 / table 5 below.
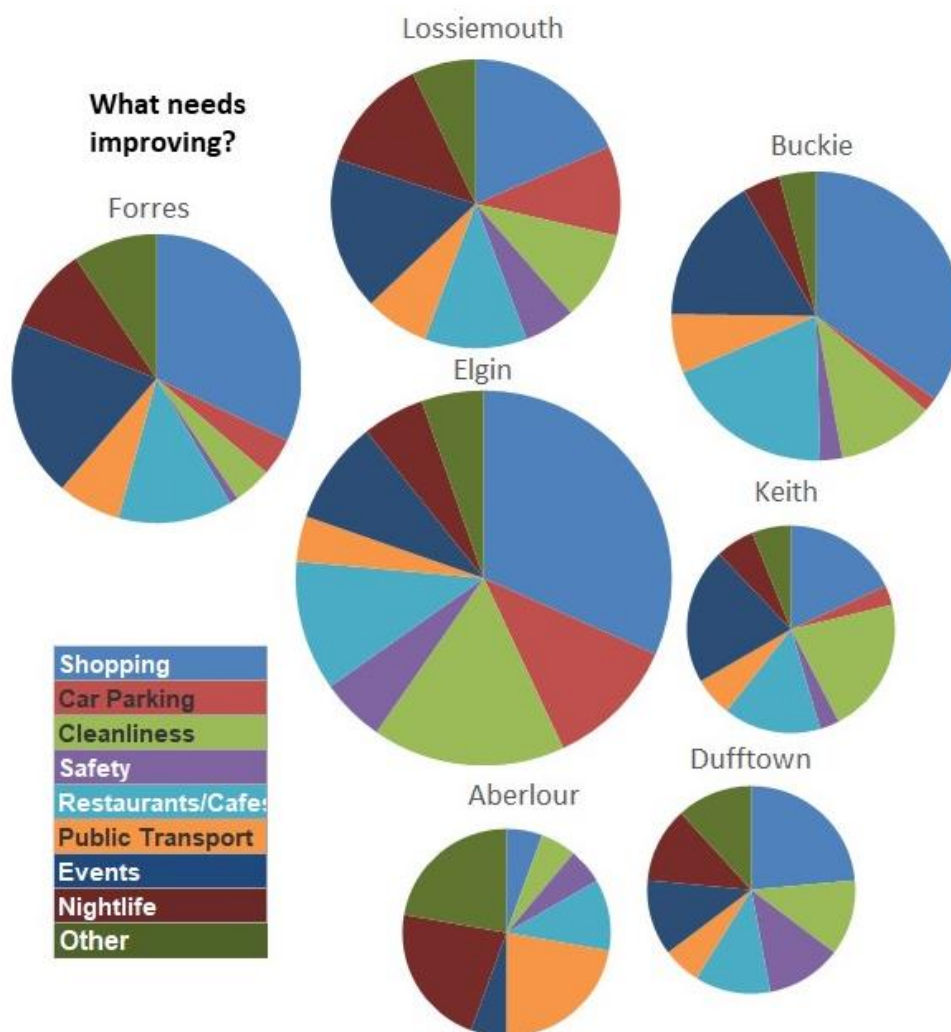
Figure 4

	Aberlour	Buckie	Dufftown	Elgin	Forres	Keith	Lossiemouth	Total
Shopping	1	42	4	372	68	6	13	506
Car Parking	0	2	0	134	9	1	7	153
Cleanliness	1	13	2	195	9	7	7	234
Safety	1	3	2	65	2	1	4	78
Restaurants/Cafes	2	23	2	132	27	5	8	199
Public Transport	4	8	1	46	15	2	5	81
Events	1	20	2	105	42	7	12	189
Nightlife	4	5	2	63	20	2	9	105
Other	4	5	2	63	20	2	9	105

Table 5

- Shopping was noted most in need of improvement in all town centres. In Lossiemouth, an equal number voted for shopping as for evening economy/events improvement.
- Cleanliness came out second as most in need of improvement everywhere, particularly in Elgin.
- Car parking (particularly in Elgin) and restaurants (in Buckie) came third as requiring improvement.
- Relatively few said public transport needed to be improved except for the six people responding about Aberlour.
- Safety is a concern for respondents about Dufftown. It appears only a consideration for other town centres.

79 people selected 'other' for improvements. Reasons given were very diverse. Elgin received 41 responses for 'other', followed by 22 for Forres, 9 for Lossiemouth. Common concerns in these three towns were:

- **Elgin**: public toilets, general appearance, and upkeep (repairs to buildings), empty retail premises, increase in low-quality 'Poundland'-type shops, charity shops, nail bars and fast-food outlets. People said more should be done to attract those high-quality chain stores which do not necessarily thrive in the out-of-town retail parks.
- **Forres**: People had a brighter view of Forres, saying it has potential and attracted comments about local volunteers not the Council making it pretty. Again, public toilets, fabric of buildings and proliferation of fast-food outlets were a concern.
- **Lossiemouth**: four of the nine respondents focussed on the town's Post Office, which has erratic opening hours.

11.6. Other Comments
The final question of the survey was open ended, inviting people to make comments or proposals. About half of the 646 respondents to the survey (325 or 51%) had comments to make. These largely repeated question 5 re-stating what they thought needed improvement, with a sprinkling of complimentary remarks, for example the work of local volunteers in flower arranging to brighten up town centre.

It was clear people wanted to talk most about Elgin; 222 of the comments (68%) and proposals concerned the town. The comments are summarised graphically in the 'word cloud' in figure 5, it is the overall picture for the seven towns as well as Elgin.

Figure 5

Some 58 of the 325 comments appertained to parking, this includes a range of issues from wanting cheaper parking, fairer parking charges (parking is free in Forres but not Elgin) and inconsiderate parking in the 'Plainstones' area and Batchen Street in Elgin.

Among their comments, 43 people asked whether anything could make commercial landlords improve the state of their buildings or do something about units which have lain empty for years. The survey offered ideas for what could occupy the vacant premises (change of use to affordable accommodation/living areas and 'pop up' shops (as in Keith)) were suggested for vacant premises.

A number of people suggested that it is not the traditional bricks-and-mortar shops that we should be focussing on since these have long emigrated to out-of-town shopping parks. Instead, focus should be on attracting farmers markets, Christmas markets, events such as civic ceremonies (reviving 'Kirking of the Council'), Parisian-style 'wild posting' areas, dedicated busking areas and developing the outdoor 'cafe culture'.

Some 42 people mentioned the quality of the shops in their comments, largely repeating their selections in question 5. They thought the proliferation of low-end shops like vape shops, fast food and charity shops should be restricted.

Some 11 people made reference to culture and arts potential in Keith, Forres and Elgin. With the architecture and history of the area they said that a Findhorn Bay-type venue would attract more visitors to the towns, and it is a shame that some parts appear to be permanently covered in scaffolding.

11.7. Town Centre Perception Survey going forward

The intention is for the Town Centre Perception Survey to be undertaken annually. This will allow comparison over time and help to assess the impact of regeneration project and activities within town centres.

Appendix I: Location of Key Centres

Location of Key Centres within the Study Area

Appendix II=: GOAD Categories and Classifications

GOAD Class	GOAD Sub-Class	Primary Activity	Code
Retail	Comparison	Antiques shops	COM 1
Retail	Comparison	Art & Art dealers	COM 2
Retail	Comparison	Booksellers	COM 3
Retail	Comparison	Carpets and Flooring	COM 4
Retail	Comparison	Charity Shops	COM 5
Retail	Comparison	Chemists & Drugstores	COM 6
Retail	Comparison	Children's & Infants wear	COM 7
Retail	Comparison	Crafts, Gifts, China & Glass	COM 8
Retail	Comparison	Cycles & Accessories	COM 9
Retail	Comparison	Department and Variety Stores	COM 10
Retail	Comparison	DIY & Home Improvement	COM 11
Retail	Comparison	Electrical & Other Durable Goods	COM 12
Retail	Comparison	Florists	COM 13
Retail	Comparison	Footwear	COM 14
Retail	Comparison	Furniture	COM 15
Retail	Comparison	Gardens & Equipment	COM 16
Retail	Comparison	Greeting Cards	COM 17
Retail	Comparison	Hardware & Household Goods	COM 18
Retail	Comparison	Jewellery, Watches & Silver	COM 19
Retail	Comparison	Mixed Clothing	COM 20
Retail	Comparison	Ladies Wear & Accessories	COM 21
Retail	Comparison	Leather & Travel Goods	COM 22
Retail	Comparison	Men's Wear & Accessories	COM 23
Retail	Comparison	Music & Musical Instruments	COM 24
Retail	Comparison	Stationers	COM 25
Retail	Comparison	Office Supplies	COM 26
Retail	Comparison	Other Comparison Goods	COM 27
Retail	Comparison	Photographic	COM 28
Retail	Comparison	Second Hand Goods & Books	COM 29
Retail	Comparison	Sports, Camping & Leisure Goods	COM 30
Retail	Comparison	Telephones & Accessories	COM 31
Retail	Comparison	Textiles & Soft Furnishings	COM 32
Retail	Comparison	Toys, Games & Hobbies	COM 33
Retail	Comparison	Vehicle & Motorcycle Sales	COM 34
Retail	Comparison	Vehicle Accessories	COM 35
Retail	Comparison	Opticians	COM 36
Retail	Convenience	Bakers & Confectioners	CNV 1
Retail	Convenience	Butchers	CNV 2

GOAD Class	GOAD Sub-Class	Primary Activity	Code
Retail	Convenience	Convenience Store, Groceries & Frozen Food	CNV 3
Retail	Convenience	Delicatessen	CNV 4
Retail	Convenience	Fishmonger	CNV 5
Retail	Convenience	Health Foods	CNV 6
Retail	Convenience	Markets	CNV 7
Retail	Convenience	Off licence	CNV 8
Retail	Convenience	Shoe repairs etc	CNV 9
Retail	Convenience	Supermarkets	CNV 10
Retail	Convenience	Confectionery, Tobacconist, Newsagent	CNV 11
Retail	Retail Service	Clothing & Fancy-Dress Hire	RS 1
Retail	Retail Service	Dry Cleaner & Laundrette	RS 2
Retail	Retail Service	Filling Stations & Garages	RS 3
Retail	Retail Service	Health & Beauty (e.g. beauticians, nail bars)	RS 4
Retail	Retail Service	Hairdressers/Barbers	RS 5
Retail	Retail Service	Other Retail Outlets	RS 7
Retail	Retail Service	Photo Processing	RS 8
Retail	Retail Service	Photo Studio	RS 9
Retail	Retail Service	Post Offices	RS 10
Retail	Retail Service	Repair, Alterations & Restoration	RS 11
Retail	Retail Service	Travel Agents	RS 12
Retail	Retail Service	Vehicle Rental	RS 13
Retail	Retail Service	Vehicle Repair & Services	RS 14
Retail	Other Retail	Shops	OR 1
Service	Leisure Services	Bars, Wine Bars & Public House	LS 1
Service	Leisure Services	Bingo & Amusement	LS 2
Service	Leisure Services	Cafes	LS 3
Service	Leisure Services	Casino & Betting Offices	LS 4
Service	Leisure Services	Cinemas, Theatres & Concert Halls	LS 5
Service	Leisure Services	Clubs	LS 6
Service	Leisure Services	Disco, Dance & Nightclub	LS 7
Service	Leisure Services	Fast Food & Takeaways	LS 8
Service	Leisure Services	Hotels & Guest Houses	LS 9
Service	Leisure Services	Restaurants	LS 10
Service	Leisure Services	Sports & Leisure Facilities	LS 11
Service	Financial & Business Services	Building Society	FBS 1
Service	Financial & Business	Building Supplies & Services	FBS 2
Service	Financial & Business Services	Business Goods & Services	FBS 3

GOAD Class	GOAD Sub-Class	Primary Activity	Code
Service	Financial & Business Services	Employment & Careers	FBS 4
Service	Financial & Business Services	Financial Services	FBS 5
Service	Financial & Business Services	Legal Services	FBS 6
Service	Financial & Business Services	Other Business Services	FBS 7
Service	Financial & Business Services	Printing & Copying	FBS 8
Service	Financial & Business Services	Property Services	FBS 9
Service	Financial & Business Services	Retail Banks	FBS 10
Service	Health & Medical Services	Chiropodist	HMS 1
Service	Health & Medical Services	Dental Surgery	HMS 2
Service	Health & Medical Services	Doctors Surgery	HMS 3
Service	Health & Medical Services	Health Centre	HMS 4
Service	Health & Medical Services	Nursing Home	HMS 5
Service	Health & Medical Services	Osteopath	HMS 6
Service	Health & Medical Services	Other Health & Medical Service	HMS 7
Service	Health & Medical Services	Rest home	HMS 8
Service	Health & Medical Services	Veterinary surgery	HMS 9
Service	Public Service	Advice Centre	PS 1
Service	Public Service	Community Centre	PS 2
Service	Public Service	Council Offices	PS 3
Service	Public Service	Educational Establishment	PS 4
Service	Public Service	Emergency Services	PS 5
Service	Public Service	Information Centre	PS 6
Service	Public Service	Kindergarten	PS 7
Service	Public Service	Library	PS 8
Service	Public Service	Museum & Art Gallery	PS 9
Service	Public Service	TA/Cadet Centre	PS 10
Service	Public Service	Tourist Information	PS 11
Service	Religious Service	Place of Worship	REL
Vacant	Vacant Retail	Vacant Shop	VAC 1

REPORT TO: SPECIAL MEETING MORAY COUNCIL ON 24 APRIL 2024

SUBJECT: **MORAY PLAY SUFFICIENCY ASSESSMENT 2023**

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

1.   REASON FOR REPORT

1.1   This report asks Council to consider and approve the Moray Play Sufficiency Assessment 2023.

1.2   This report is submitted to Council in terms of Section III (E) (2) of the Council's Scheme of Administration relating to the preparation of Local Development Plans and is submitted to Council for efficiency to allow consideration prior to the Local Development Plan Evidence Report.

2.   RECOMMENDATION

2.1   **It is recommended that the Committee:**

(i)   **note the findings of the Moray Play Sufficiency Assessment 2023;**

(ii)   **agrees the Moray Play Sufficiency Assessment, as set out in Appendix 1;**

(iii)   **agrees the Moray Play Sufficiency Assessment 2023, as set out in Appendix 1, as a material consideration for future planning policy and planning application decision making from 30th April 2024 and submit this as part of the Local Development Plan Evidence Report; and**

(iv)   **delegates authority to the Head of Economic Growth and Development to prepare a StoryMap of the Moray Play Sufficiency Assessment and for this to be published online.**

3. BACKGROUND

3.1 Section 16D of the Town and Country Planning (Scotland) Act 1997 places a statutory duty on Local Authorities to prepare Play Sufficiency Assessments. Planning Authorities must carry out a Play Sufficiency Assessment (PSA) as part of the Evidence Report at the first stage in progressing new Local Development Plans (LDPs). The Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2023 sets out the form and content of the assessment and who must be consulted in its preparation. Play Sufficiency Assessment Regulations 2023: Planning Guidance was published in December 2023.

3.2 National Planning Framework 4 (NPF4) Policy 21: Play, recreation and sport, sets out that Local Development Plans (LDPs) should identify sites for sports, play and outdoor recreation for people of all ages, and support development proposals that protect, enhance or improve children's access to play. NPF4 recognises that many people, including children and young people, need better places to support their lifelong health and wellbeing and build their future resilience. It seeks to improve the quality of life of people across Scotland through facilitating places that enable local living, including providing access to playgrounds and green or blue spaces where there are opportunities for relaxation and informal play.

3.3 Preparation of the PSA is part of the early engagement and data collection for the Evidence Report. The evidence gathered in the PSA will be used to inform the preparation of the new LDP. The PSA provides an understanding of where children can play outdoors, how good the play spaces are, and if play spaces meet children's and young people's needs.

3.4 Equipped play areas were identified across Moray using data held by the Moray Council Open Space Management service, play areas identified ENV in the LDP, identifying where children told us they played during engagement and also by reviewing the OS MasterMap Topography layer using GIS. This identified 160 equipped play areas across Moray. This allowed an assessment of the quantity, quality and accessibility of equipped play areas to be completed.

3.5 Site visits to all equipped play spaces were completed in the autumn/winter of 2023. Data collected included a description of the play opportunities and an assessment of the quality of the play opportunity using a framework developed with Ironside Farrar. Equipped play areas were assessed and scored against various criteria relating to the play space location, its design, the play opportunities provided, creative play opportunities and social play opportunities. This provided an overall indication of the quality of the play value of the equipped play space. It should be noted that this scoring is wider than the condition of the equipment and a dated or older play area could still score well due to its location, overall design and the range of play opportunities identified. The condition of equipped play spaces managed by Moray Council is monitored by the Open Space team through independent annual condition assessments and regular inspections by Council staff. This is a separate process from, but has informed, the PSA.

3.6   Informal play spaces were identified from where children told us they played during engagement and reviewing LDP ENV's and the Open Space Strategy. This was completed for the primary, secondary and tertiary settlements identified in the LDP spatial strategy (i.e. Elgin, Forres, Buckie, Keith, Lossiemouth, Aberlour, Fochabers and Mosstodloch).

4.   Key Findings

4.1   A summary of the key findings of the PSA is set out below.

- A total of 160 equipped play areas were identified, including 93 managed by Moray Council. It is noted that not all play spaces that Moray Council are responsible for are included in the Play Sufficiency Assessment. For example, play equipment within school grounds that is not accessible out of school hours has not been assessed due to the restricted access and therefore limited contribution made to play.
- The majority (120) of equipped play areas were Local Equipped Areas of Play (LEAP) that are primarily designed for children 0-11 years with features and equipment for children beginning to play independently close to where they live.
- 43% of equipped play spaces were found to have good or high-quality play value. 39% of equipped play spaces were found to be of reasonable quality play value. 18% of equipped play spaces were found to be of poor-quality play value.
- 79% of households in Moray are within walking catchment of a reasonable, good or high-quality equipped play areas. The 21% outwith a walking catchment is made up of 6% in towns and village and 15% in the countryside (out with a settlement boundary).
- A deficiency in provision for 11-17 years old has been identified.
- Dedicated space for 0-4 was also identified as a deficiency.
- Provision of inclusive and wheelchair accessible play opportunities are very limited across Moray.
- Provision for creative play opportunities within equipped play areas is limited.
- Moray benefits from many and varied attractive natural spaces that provide informal play opportunities. The rural nature of Moray means that most households have good access to informal play opportunities.
- The west of Elgin, east of Buckie Harbour/eastern parts of Portessie, the South of Forres (St Leonards Road and eastern parts of Woodside Drive), the very far south of Aberlour and the west of Mosstodloch were identified as falling out with the walking catchments of a reasonable or better equipped play space.
- The wide catchment of some of the key play areas in Keith, Lossiemouth, and Fochabers meant that all but a handful of households were in the walking catchment of a reasonable or better equipped play area.

4.2 The PSA data and findings will be used to the inform the new place based LDP. This could include identifying parks where improvements to the play value are required with a particular focus on addressing the deficiencies set out above. The PSA mapping and data will also be used to identify play requirements in new development. This could be through identifying new play provision within the development or identifying requirements for existing play areas where the walking catchment of an existing park falls within the development. The latter will require further work to develop a robust methodology in respect of Developer Obligations.

4.3 The PSA will also link and integrate with wider work relating to green and blue infrastructure including an updated Moray Open Space Strategy. The data and mapping can also help in the consideration of the impacts of changing play provision – for the example what impact changing the role of a play park from a Local Equipped Area of Play (LEAP) to a Neighbourhood Equipped Area of Play (NEAP) or vice versa would have on the quality and accessibility of play opportunities within an area.

4.4 It is noted that the Council's Open Space team are currently committed to upgrading a minimum of two council play areas per year. Funding from the Scottish Government Local Authority Play Park Renewal Programme has been used to upgrade parks across Moray with further funding of £282,000 for 2024/2025 and £469,000 for 2025/2026. Parks that have been or are programmed to be upgraded with 2023/2024 funding include Mannachie Park Forres, Letterfourie Park Buckie and Tomnavoulin Play Area. Replacement slides at Tomintoul and Well Road Buckie have been provided, signage at Lossiemouth and landscaping at Morven Findochty. The 2024/2025 prioritised play area renewal projects are Randolph Lane in Forres and Hopeman Playing Field. Moray Council Open Space prioritise sites for upgrade based on risk and safety taking account of independent condition inspections/scoring and also monthly condition inspections.

4.5 For the purposes of publishing the PSA online it is proposed to develop a StoryMap format that will allow interactive mapping to be incorporated. This will include the same data and information as the version at **Appendix 1** but allow for mapping to be moved to areas of interest and provide a more engaging format. **Appendix 1** will be submitted as part of the Evidence Report.

5. **SUMMARY OF IMPLICATIONS**

   (a) **Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))**
   Playing is an inherent part of a happy childhood and is vital to children's physical and cognitive development as they grow. Open spaces, green infrastructure and outdoor play spaces are key parts of successful placemaking, helping to create pleasant, liveable, healthy and resilient communities.

(b) Policy and Legal
If approved the Moray Play Sufficiency Assessment would be a material consideration in any relevant future planning applications.

(c) Financial implications
Development of the methodology for assessing play spaces was completed by consultant and was met from Strategic Planning and development budgets.

(d) Risk Implications
Play Sufficiency Assessments are a statutory requirement and required for the LDP Evidence Report. Not having an agreed Play Sufficiency Assessment in place could risk the Evidence Report failing the Gatecheck.

(e) Staffing Implications
Site visits to all equipped play spaces was completed by staff form the Strategic Planning and Development team. The methodology was developed by Ironside Farrar.

Strategic Planning and Development have liaised with the Open Space team during the development of the PSA.

(f) Property
None

(g) Equalities/Socio Economic Impact
There are no direct implications from this report as the PSA does not include proposals but sets out the evidence base of the sufficiency of play opportunities in Moray. This assessment has been informed by engagement with children and young people. It has also been informed by a public survey with the survey link emailed directly to community councils and groups working with children and young people in Moray including ASN groups.

(h) Climate Change and Biodiversity Impacts
There are no climate change or biodiversity implications arising directly from this report. However, informal and formal play spaces contribute to green and blue networks and there are opportunities for play spaces to contribute more to biodiversity and to be adaptive to expected impacts of climate change. Access to appropriate play spaces locally can also reduce carbon emissions associated with travel. The PSA also links to ongoing work to update the Moray Open Space Strategy.

(i) Consultations
Consultation has taken place with the Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, Head of Governance, Strategy and Performance, the Legal Services Manager, Democratic Services Manager, the Chief Financial Officer the Principal Climate Change Officer, the Equal Opportunities Officer and the Open Space Manager.

5. CONCLUSION

5.1 Preparation of the PSA is a statutory duty with regulations prescribing the form and content of PSA's and who is to be consulted. The PSA forms part of the evidence gathering for the LDP Evidence Report.

5.2 Moray's PSA has been informed by site visits and assessments and engagement with children, young people and parents and carers. The PSA provides an evidence base of where children play outdoors, how good spaces are and if spaces meet the needs of children and young people. The PSA provides and overview of the quantity, quality and accessibility of outdoor play opportunities across Moray and key settlements (Elgin, Forres, Buckie, Keith, Lossiemouth, Aberlour, Fochabers and Mosstodloch).

5.3 It is recommended that Council note the findings and agree the Moray PSA 2023 and agree that it will be material consideration for planning decisions and submitted as part of the LDP Evidence Report.

Author of Report:	Rowena MacDougall, Senior Planning Officer, Strategic Planning and Development
Background Papers:	
Ref:	SPMAN-813460984-491

The Moray Play Sufficiency Assessment 2023

Moray Play Sufficiency Assessment 2023

Introduction

The Planning Scotland Act 2019 places a statutory duty on Local Authorities to prepare Play Sufficiency Assessments (PSAs) to provide evidence of the sufficiency of formal and informal play spaces for children across neighbourhoods and the area. The PSA aims to provide an understanding of where children play, how good play spaces are, and if play spaces meet children and young people's needs. The PSA will inform the new Local Development Plan.

The Benefits of Play

Play is an inherent part of a happy childhood and is vital to children's physical and cognitive development as they grow. Open spaces, green infrastructure and outdoor play spaces are key components in successful placemaking, helping to create pleasant, liveable, healthy and resilient communities. Play is vital from the early stages of brain development and bonding with parents and carers and promotes independence and autonomy for teenagers.

Formal and Informal Play

The PSA considers the sufficiency of both formal and informal play opportunities.

Formal – Equipped play spaces. These are spaces specifically designed and managed for play and are essential in meeting the needs of children to play outdoors, to have fun and to relax. For the purpose of the PSA each equipped play area has been categorised as one of the following
- Local Area for Play (LAP)
- Local Equipped Area for Play (LEAP)
- Neighbourhood Areas of Play (NEAP)
- Destination Park

Informal – Non-equipped spaces. These are usually located within open spaces where the primary function is not play. Spaces include natural spaces, woodlands, beaches, and public realm areas.

Key Findings

- **A total of 160 equipped play areas were identified, including 93 managed by Moray Council. The majority (120) of these were Local Equipped Areas of Play (LEAP) that are primarily designed for children 0-11 years with features and equipment for children beginning to play independently close to where they live.**
- **43% of equipped play spaces were found to have good or high-quality play value. 39% of equipped play spaces were found to be of reasonable quality play value. 18% of equipped play spaces were found to be of poor-quality play value.**
- **79% of households in Moray are within walking catchments of a reasonable, good or high-quality equipped play area. The 21% out with a walking catchment is made up of 6% in towns and village and 15% in the countryside (out with a settlement boundary).**
- **A deficiency in provision for 11-17 years old has been identified.**
- **Dedicated space for 0-4 was also identified as a deficiency.**
- **Provision of inclusive and wheelchair accessible play opportunities are very limited across Moray.**
- **Provision for creative play opportunities within equipped play areas is limited.**

1

- **Moray benefits from many and varied attractive natural spaces that provide informal play opportunities. The rural nature of Moray means that most households have good access to informal play opportunities.**
- **The west of Elgin, east of Buckie Harbour/eastern parts of Portessie, in the South of Forres (St Leonards Road and eastern parts of Woodside Drive), the very far south of Aberlour and the west of Mosstodloch were identified as falling out with the walking catchments of a reasonable or better equipped play space.**
- **The wide catchment of some of the key play areas in Keith, Lossiemouth, and Fochabers meant that all but a handful of households were in the walking catchment of a reasonable or better equipped play area.**

Assessment Process

Equipped play areas were identified across Moray using data held by the Moray Council Open Space Management service, play areas identified ENV in the LDP, from identifying where children told us they played and also by reviewing the OS MasterMap Topography layer using GIS. This identified 160 equipped play areas across Moray. This allowed an assessment of the quantity, quality and accessibility of equipped play areas to be completed. Site visits to all equipped play spaces were completed in the autumn of 2023. Data collected included a description of the play opportunities and an assessment of the quality of the play opportunity. Informal play spaces were identified from where children told us they played and reviewing LDP ENV's and the Open Space Strategy. Following assessment some play areas were not included within the Play Sufficiency Assessment as they had limited or restricted accessibility for example play equipment in school grounds that was not open when schools were closed or where there was a requirement to "pay to play".

Engagement and Consultation

In preparing the Play Sufficiency Assessment Moray Council have sought to engage with children and young people, parents and carers, Community Councils and the public generally. A variety of methods were used to seek views.

- Two online surveys were conducted one aimed at children and young people and the other aimed at adults (including parents and carers and Community Councils).

- Planning officers held a session with pupils from Seafield Primary School. Pupils from primary 5 to 7 helped to assess a play space and told us what was "tops" and "pants" about the space. Pupil feedback also helped to identify where children played informally.

- A similar session with children and parents identifying the positives (tops) and the negatives (pants) was held at New Elgin Primary School. This event also used mapping to review informal green spaces.

- As part of a shared learning day focused on local living at Elgin Academy S1 to S3 pupils completed a Place Survey which included questions about play/hanging out.

- As part of wider engagement on the new Local Development Plan community and drop-in sessions were held across Moray between March and September 2024. These allowed collection of views on play and open spaces.

A summary of what people told us through this engagement and consultation is set out in Appendix 1.

MORAY

Equipped Play Areas

160 equipped play spaces were identified across Moray. This includes 93 equipped play spaces managed by Moray Council. It is noted that not all play spaces that Moray Council are responsible for are included in the Play Sufficiency Assessment. For example, play equipment within school grounds that is not accessible out of school hours has not been assessed as part of the PSA due to the restricted access and therefore limited contribution made to play. Moray Council have also historically supported the management and maintenance of community and other play parks. The ownership/management of these play parks are identified as "other" in the summary table at appendix 2. The play area summary table at appendix 2 provides more detailed information on each play area assessed.

EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY QUALITY VALUE)
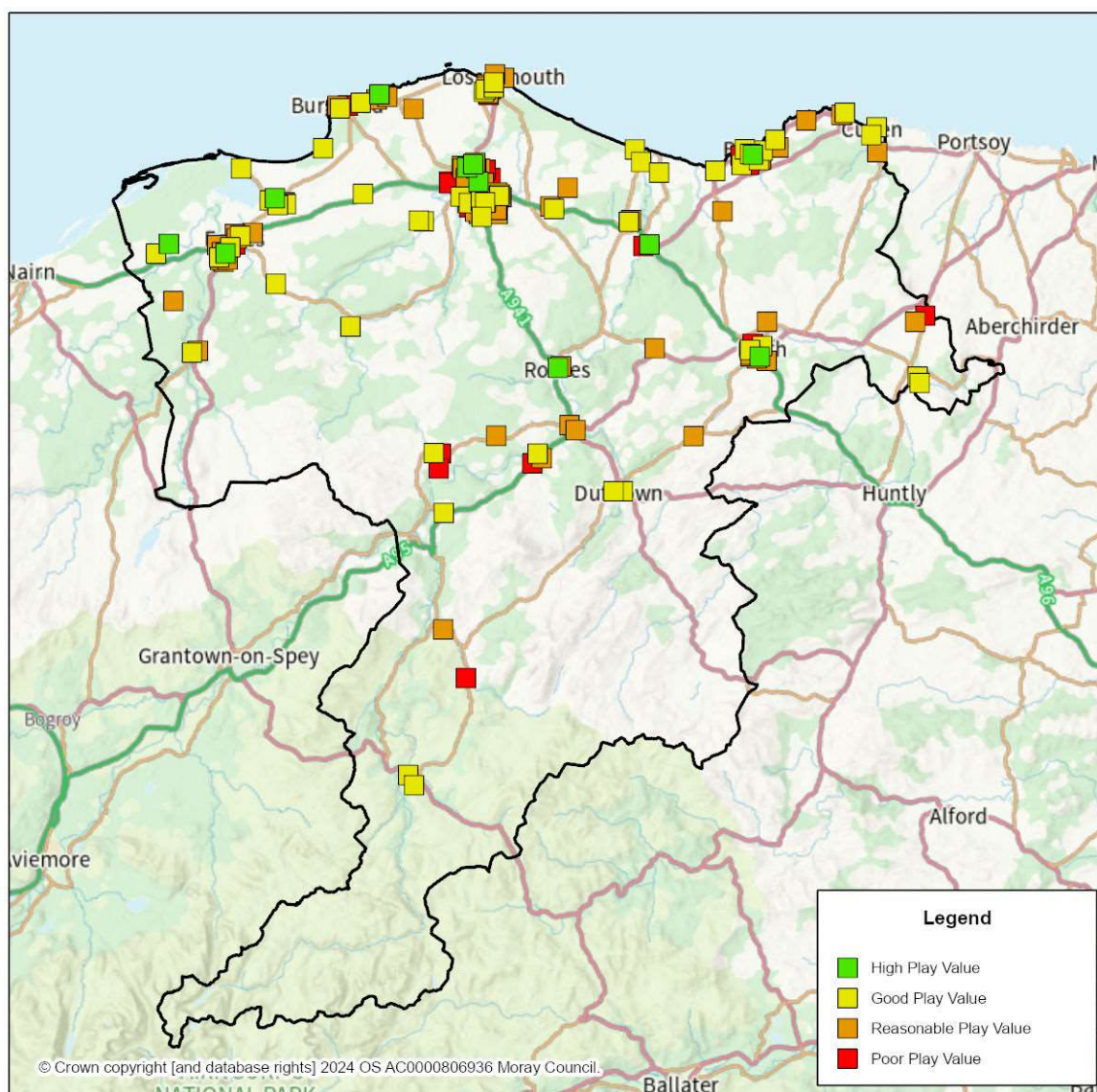
The majority (120) of play areas are Local Equipped Areas for Play (LEAP) which are areas of open space designed for children 0-11 years old, with features and equipment for children who are beginning to play independently close to where they live. 27 are Local Areas for Play (LAP) which are small play areas designed for young children. Neighbourhood Equipped Areas for Play (NEAP) make up 9 of the equipped play areas and provide a greater variety of opportunities for play for greater age range and may provide other facilities such skateboard ramps. Moray Council has identified four Destination Parks in Elgin, Forres, Aberlour and Keith which play a role within communities similar but catering to a wider catchment to NEAP and also attract visitors from a wider area including tourists.

4
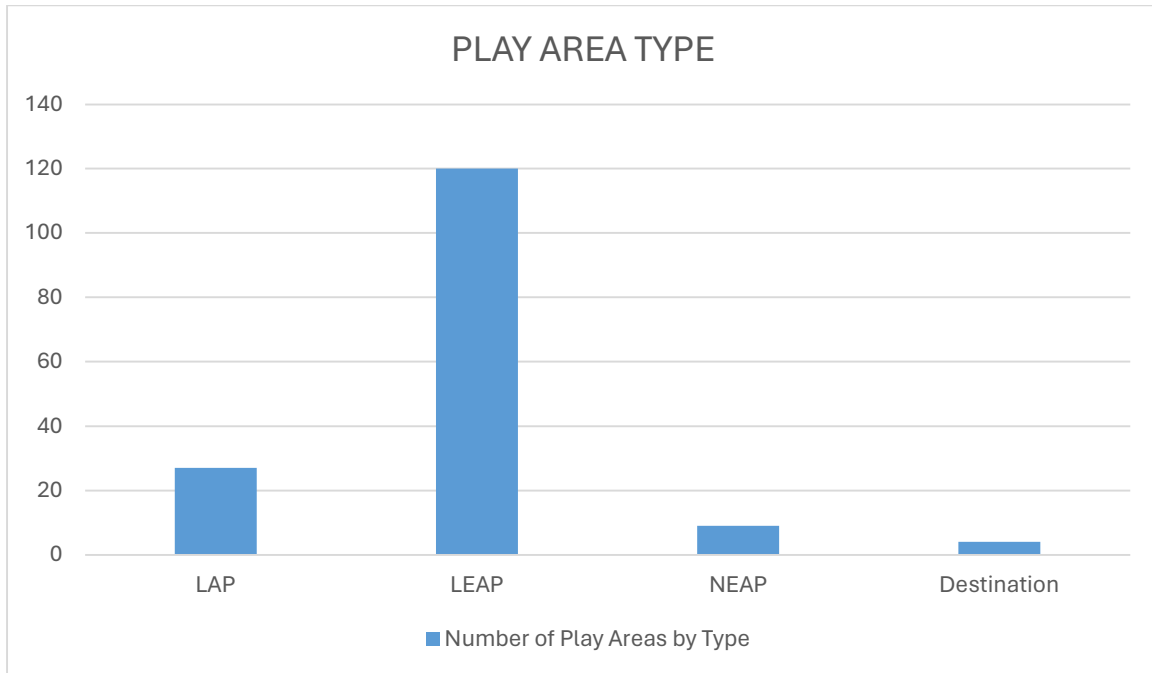
The age range equipped play areas were suitable for was also assessed. This found the majority of equipped play areas were suitable for 0–11-year-olds. Very few play areas had equipment or facilities for older children and teenagers. The gap in provision for older children and young people was also identified through the engagement process. Engagement with young people identified that young people wanted "more things to do" with specific suggestions including more swings, trampolines, outdoor gym equipment, football goals, basketball hoops, pump track, athletics track, and better walking/mountain bike trails. More seating and sheltered seating was also suggested.

Whilst a number of play areas were identified as including equipment suitable for toddlers/0-4-year-old this was as part of parks for a wider age range and in some cases may only be one or two pieces of equipment suitable for 0-4 years. Engagement highlighted a lack of dedicated play space for toddlers (i.e. equipment and space set out for 0-4 years rather than some pieces of toddler equipment mixed with equipment for older children).
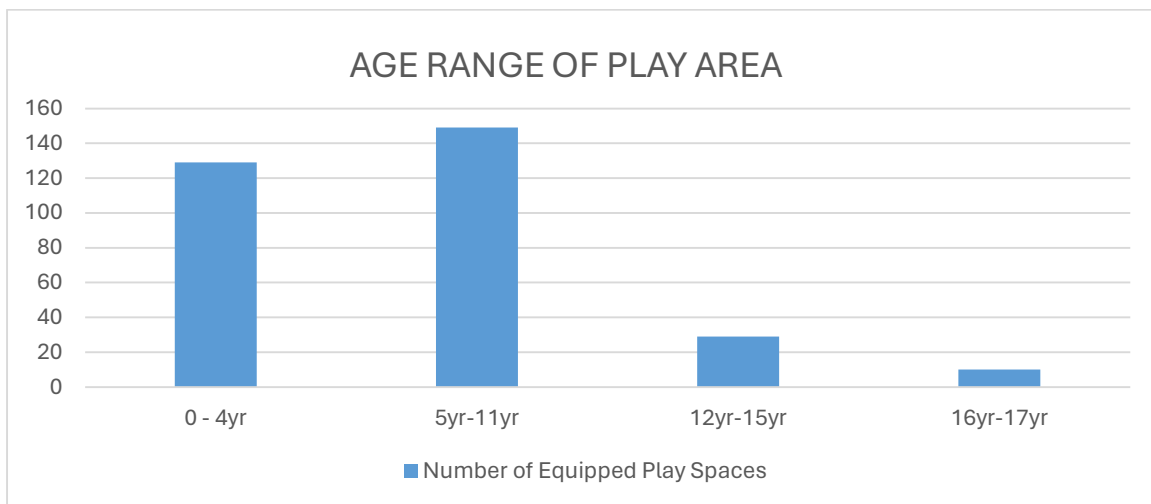
Play areas were assessed and scored against various criteria relating to the play space location, its design, the play opportunities provided, creative play opportunities and social play opportunities. This provided an overall indication of quality of the play value of the equipped play space. It should be noted that this scoring is wider than the condition of the equipment and a dated or older play areas could still score well due to its location, overall design and range of play opportunities identified. Moray Council Open Space assess the condition of all the equipped play spaces it manages annually (and the scoring for this is provided within the appendix to this report). This provides an indication of the condition of the play equipment. However, it has not been possible to collate this information for privately managed play spaces.

It should also be noted that the scoring used in the PSA assessment provides a snapshot of the quality of the play value. Play quality value will change as parks degrade over time, equipment is removed due to safety or also if new investment is made. Therefore, some play parks identified as reasonable or better during the assessment in 2023 could become poor over time.

29 equipped play areas were identified as having poor quality play value and 62 as having reasonable quality play value. Only 11 spaces were considered to offer a high-quality play value experience with 58 good quality play value.

Across all assessments it was notable that there were very limited play spaces providing creative play opportunities such as sand play, den building, water play, space to perform/sing or space to chalk/paint. These were also elements highlighted within engagement.

5

Across Moray very limited inclusive and wheelchair accessible play opportunities were identified through the assessment process. This was also reflected in the survey results where parents of children with Additional Support Needs (ASN) noted a severe lack of play opportunities. Suggestions to support ASN within the design of play parks included secure parks with fencing, more natural and sensory play (including sand, water, sensory gardens and musical play), large supportive seats for swings, floor level roundabout with seats, larger play equipment to support older children (or to fit parent), wheelchair accessible equipment, accessible play equipment so not all slides are accessible by ladder or net, the ability to play together with able siblings/friends, ensure that surfaces to equipment (particularly inclusive equipment) are good including path surfaces, kerbs and gates, signage (Makaton, disability visible/invisible awareness) and shelter. Toilet access and changing facilities were identified as being important.

PLAY QUALITY VALUE

A significant proportion of the LAP's scored poorly this is largely due to the limited play opportunities these spaces provide. Similarly, NEAP/Destination Parks scored well due to their location (often close to other facilities), the range of play equipment and the other opportunities these spaces provided (e.g. playing fields, skate parks, good path network etc).

PLAY QUALTIY VALUE BY PLAY AREA TYPE

6
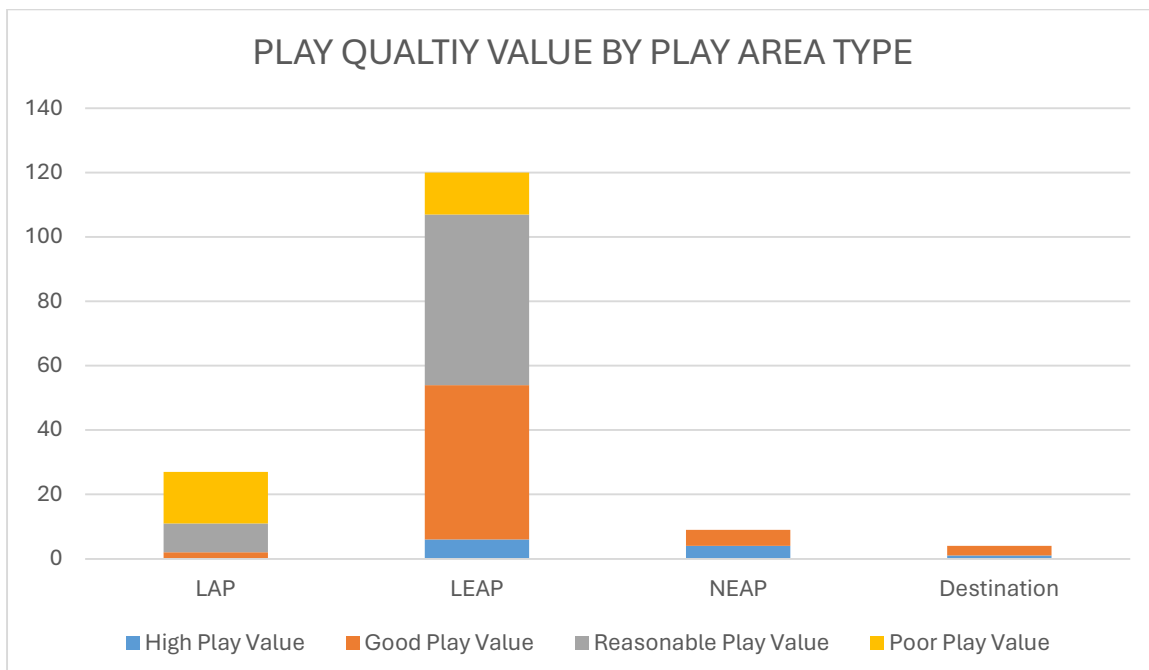
Across the whole of Moray approximately 21% of households are not within walking catchment of reasonable, good or high-quality play value equipped play space. This has been assessed by applying a buffer of 100m to LAPs, 400m for LEAPs and 1km for NEAPs and Destination Parks. A buffer was not applied to play areas identified as having poor play value quality. The 21% is made up of 6% of households within towns and villages and 15% being households in the countryside (or rural grouping).

Informal Play Areas

In addition to formal equipped play areas there are a variety of other spaces in and around Moray that provide opportunities for informal play. Moray benefits from many and varied attractive natural spaces that provide informal play opportunities. The rural nature of Moray, extensive woodland, river corridors and coast mean that most households have good access to informal play opportunities. These include woodlands, green corridors, the coast (including beaches) and natural spaces. Many of these are safeguarded from development within the LDP with ENV designations.

A review of the informal play opportunities was completed for the primary, secondary and tertiary settlements identified in the LDP2020 Spatial Strategy i.e. Elgin, Forres, Buckie, Lossiemouth, Keith, Fochabers, Aberlour and Mosstodloch. These spaces are designated ENV within the LDP and their quality has been assessed through the Open Space Audit.

7

ELGIN

Elgin Equipped Play Spaces

A total of 43 equipped play areas were identified which are broken down by type below. 19 of these are managed by Moray Council.

ELGIN NORTH EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
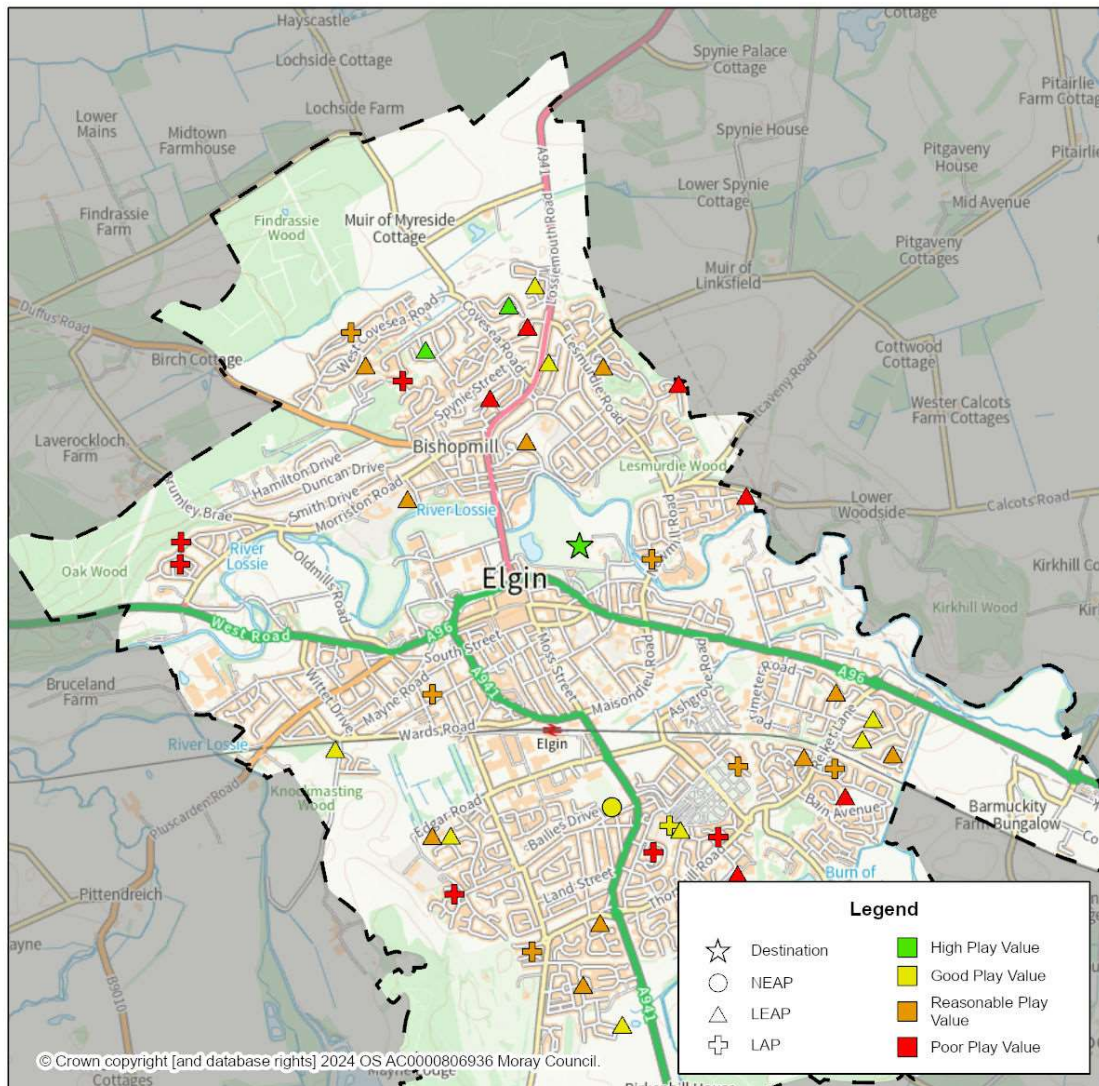
ELGIN SOUTH EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
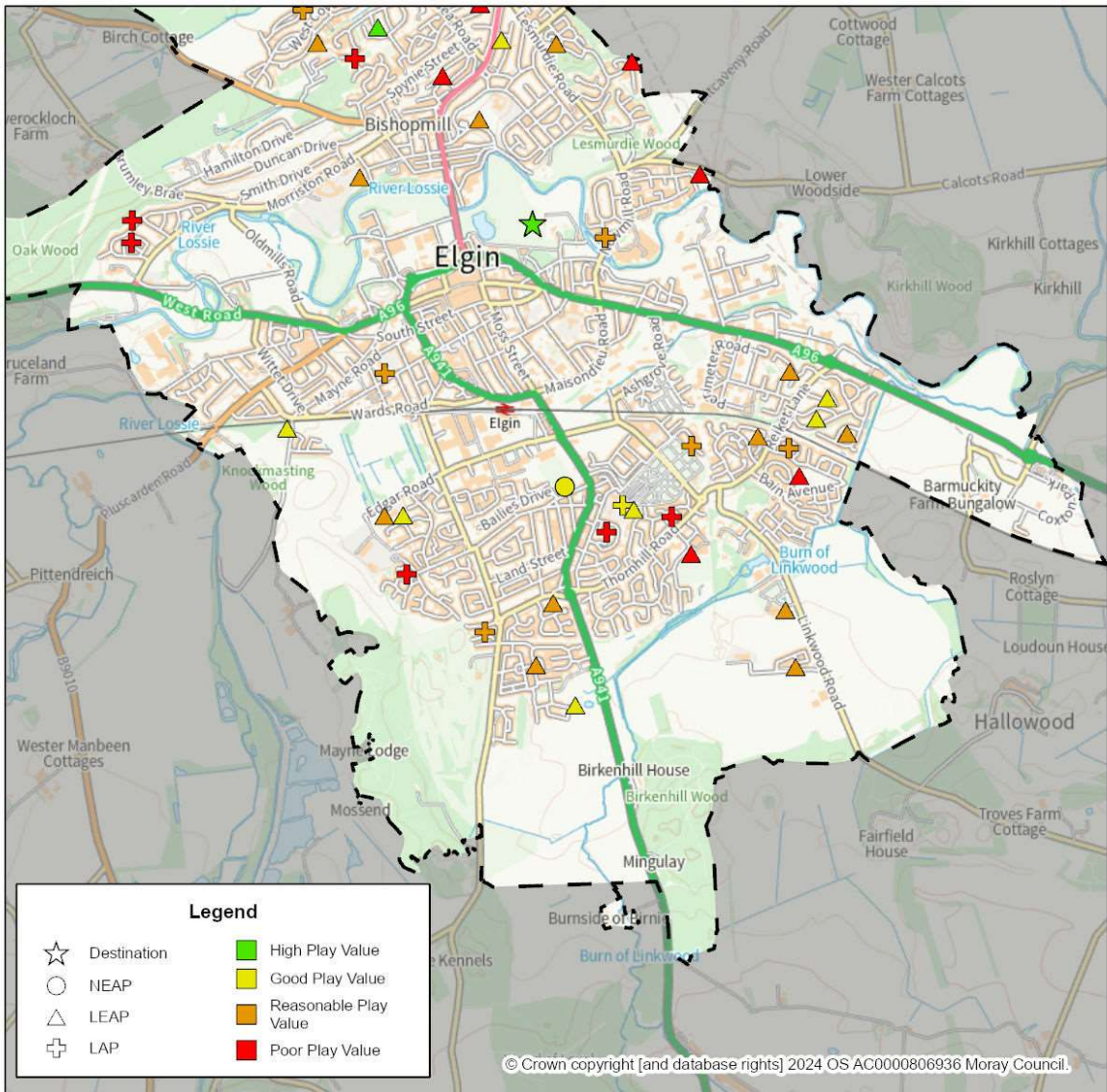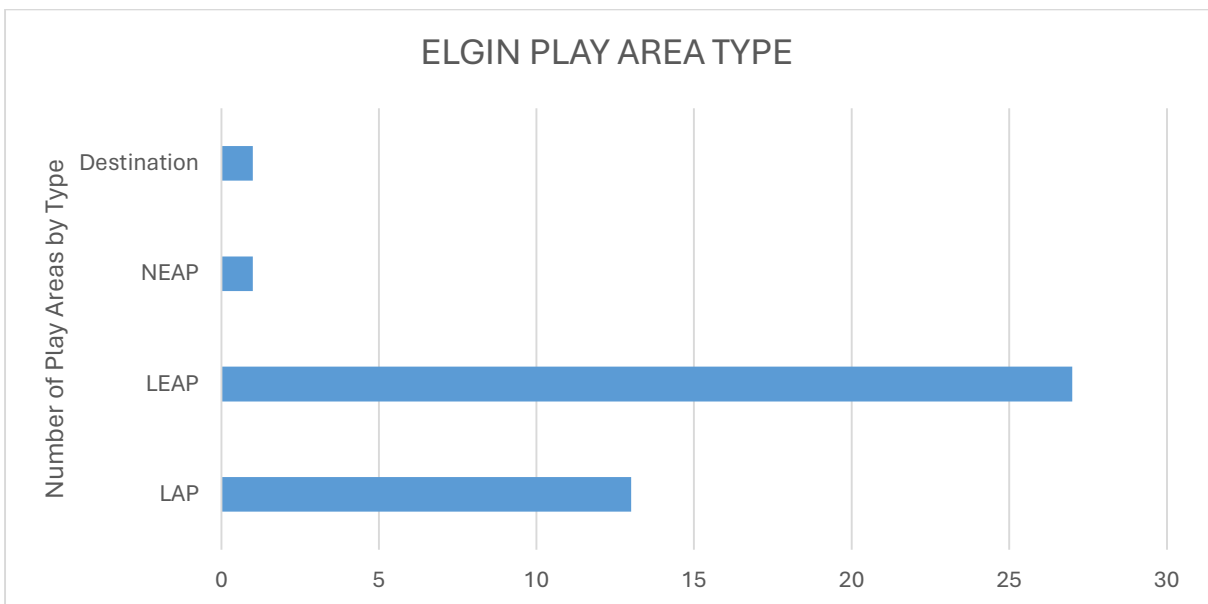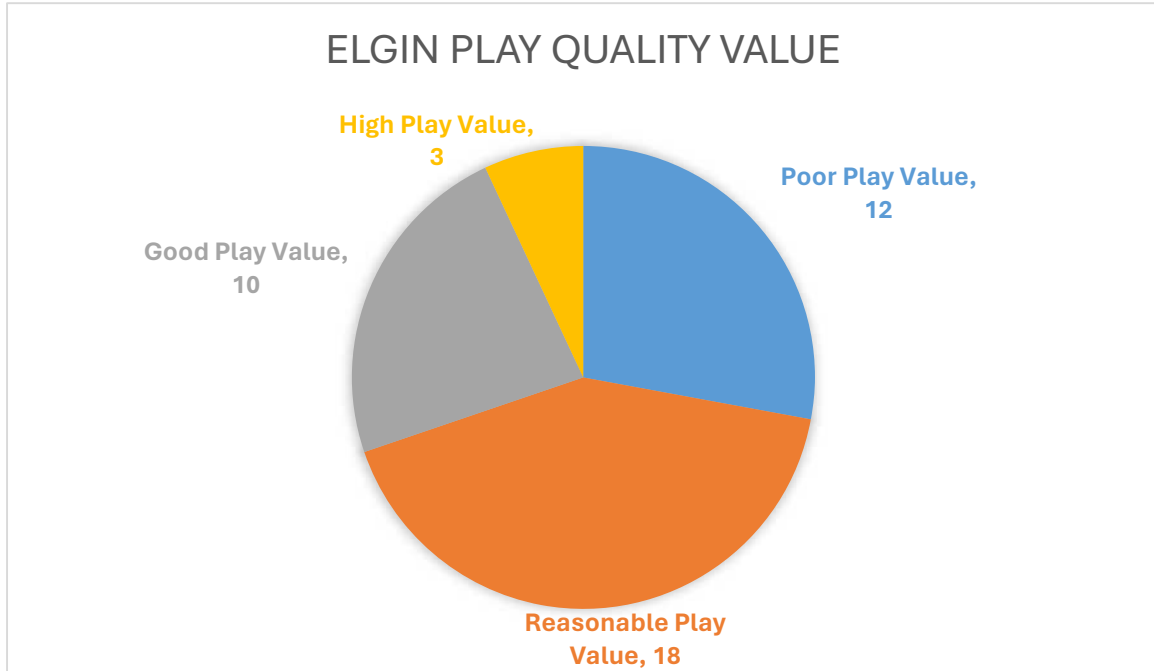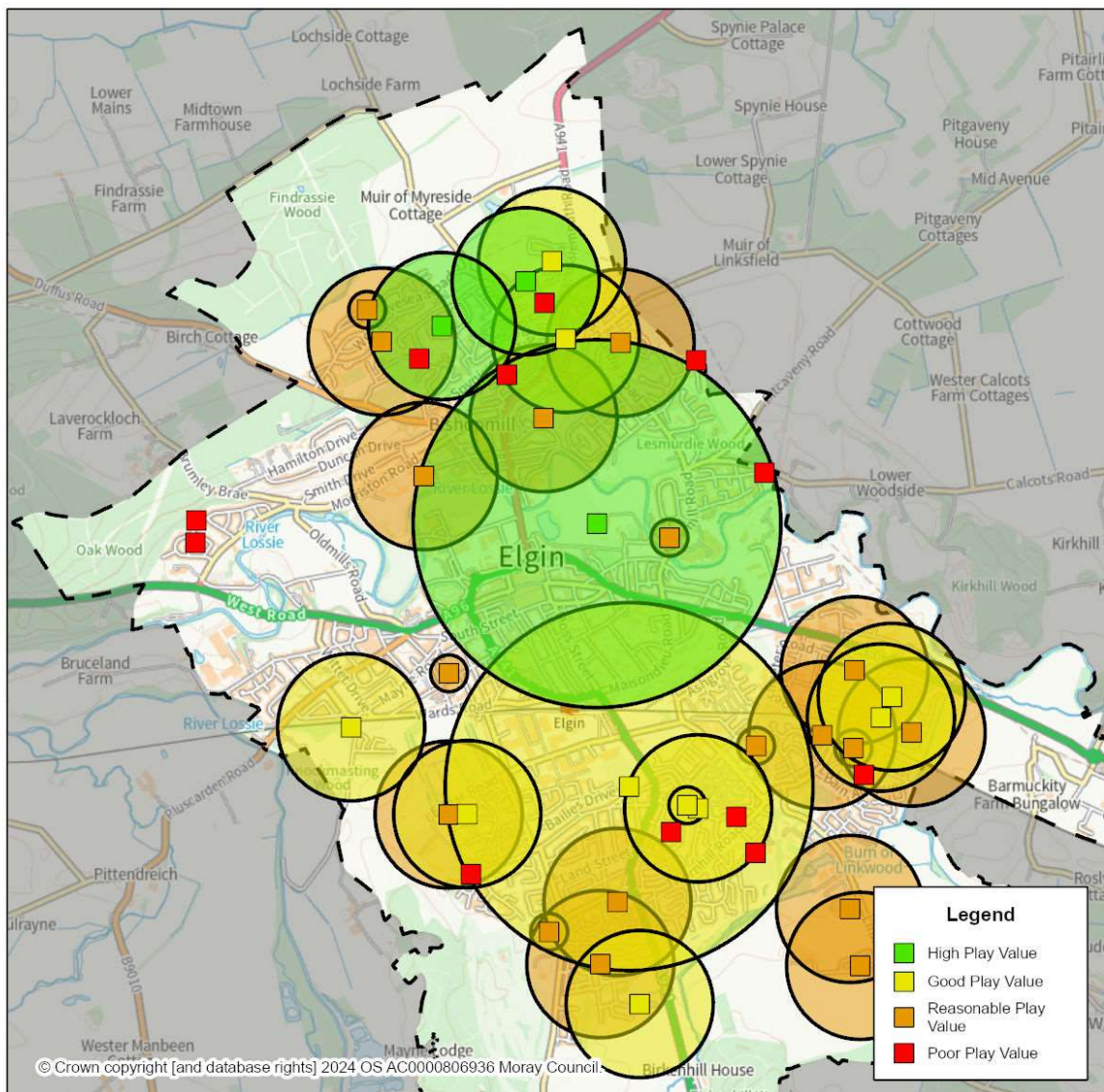
12 equipped play areas were identified as having poor quality play value and 18 as having reasonable quality play value. Three spaces were considered to offer a high-quality play value experience with 10 scored good quality play value. The spaces scoring high include Cooper Park and two parks managed by the MOD (Spynie Brae and Myreside Circle). Half of the poor equipped play spaces were LAPs, with the other half LEAPs.

ELGIN PLAY QUALITY VALUE

High Play Value, 3
Poor Play Value, 12
Good Play Value, 10
Reasonable Play Value, 18

ELGIN PLAY QUALITY VALUE BY PLAY AREA TYPE

LAP   LEAP   NEAP   Destination

■ High Play Value   ■ Good Play Value   ■ Reasonable Play Value   ■ Poor Play Value

10
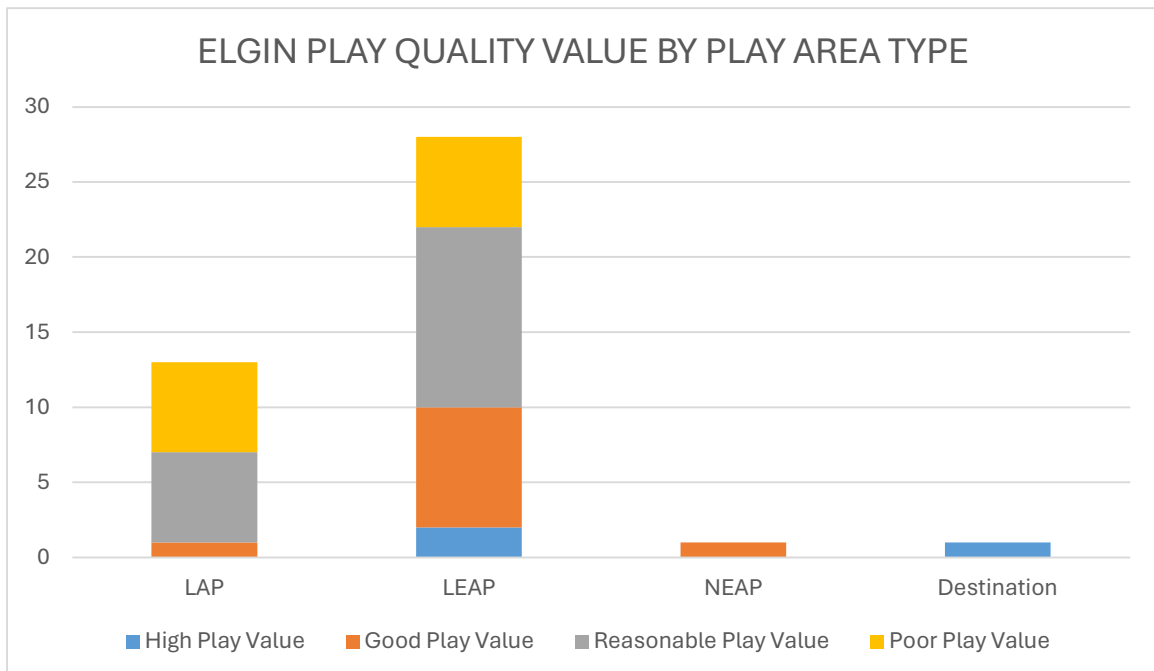
Within Elgin just over 6% of households are not within a reasonable walking distance to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). Areas identified as out with walking catchments of a reasonable or better equipped play space include the west of Elgin. This includes around the Duncan/Hamilton/Smith Drive areas and around McIntosh Drive where two LAPs with a limited catchment are rated poor. The area around Bruceland Road and streets around Westend Primary School (including Forteath and Grant Street) are highlighted as being out with the walking catchment of a reasonable or better equipped play area. Housing at Bain Road and around the former Linkwood Steading is also highlighted as not being within the walking catchment of a reasonable or better equipped play space due to the play park at Bain Avenue being identified as having poor play value quality.

ELGIN NORTH WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES

ELGIN SOUTH WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES

Legend

- High Play Value
- Good Play Value
- Reasonable Play Value
- Poor Play Value

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12
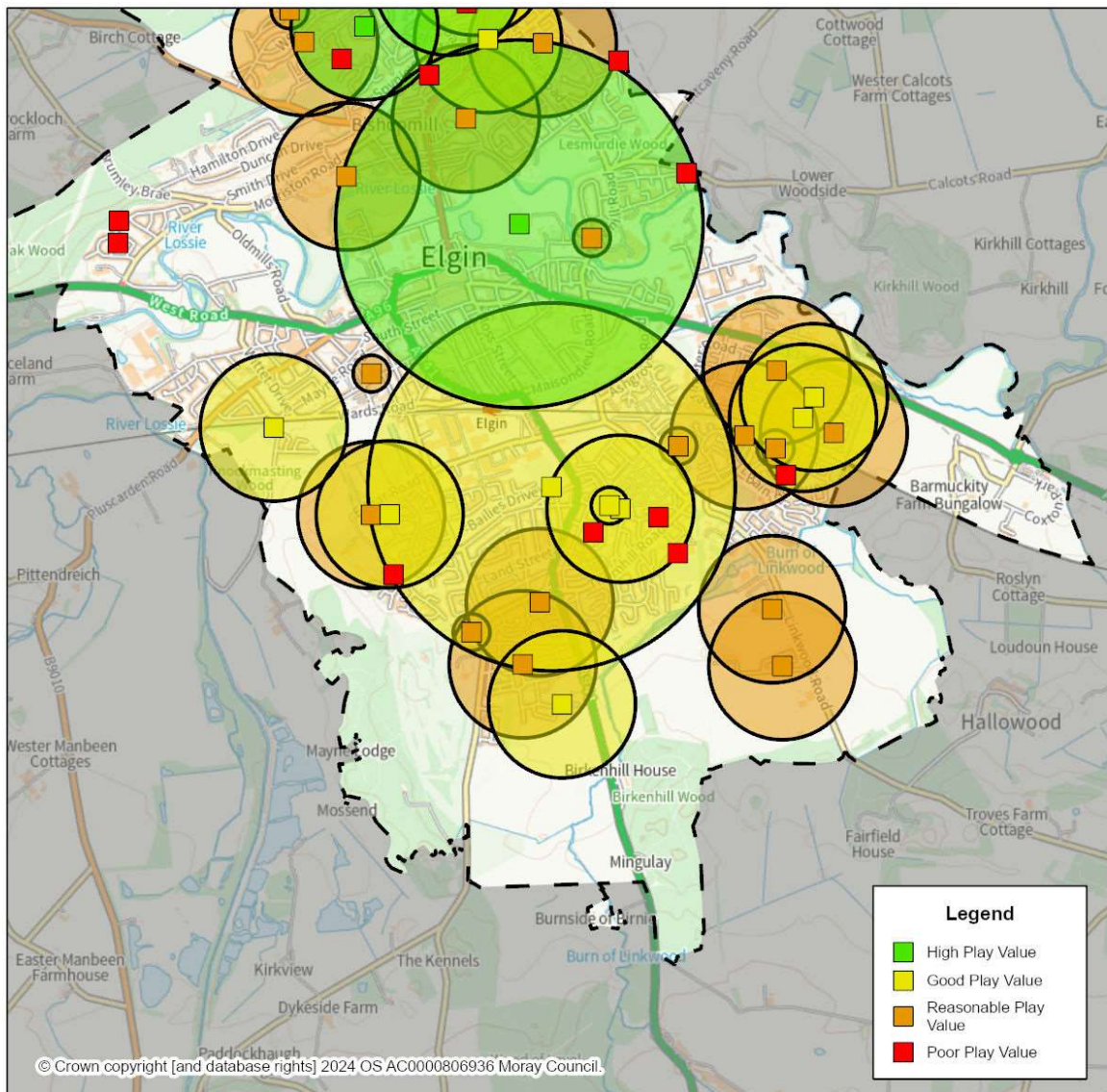
Elgin Informal Play Opportunities

In Elgin informal play opportunities are made up of amenity greenspace, green corridors, and natural spaces that are designated ENV within the LDP.

ELGIN NORTH INFORMAL PLAY OPPORTUNTIES
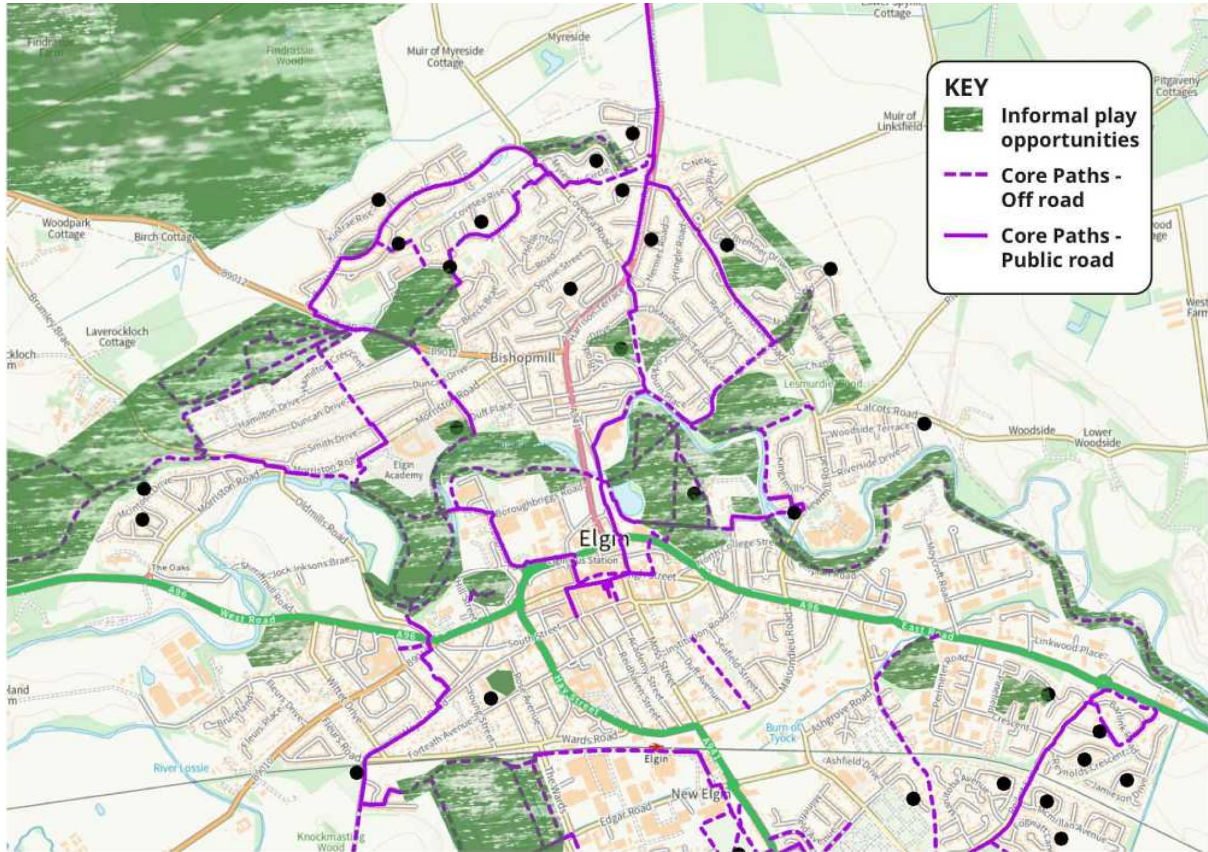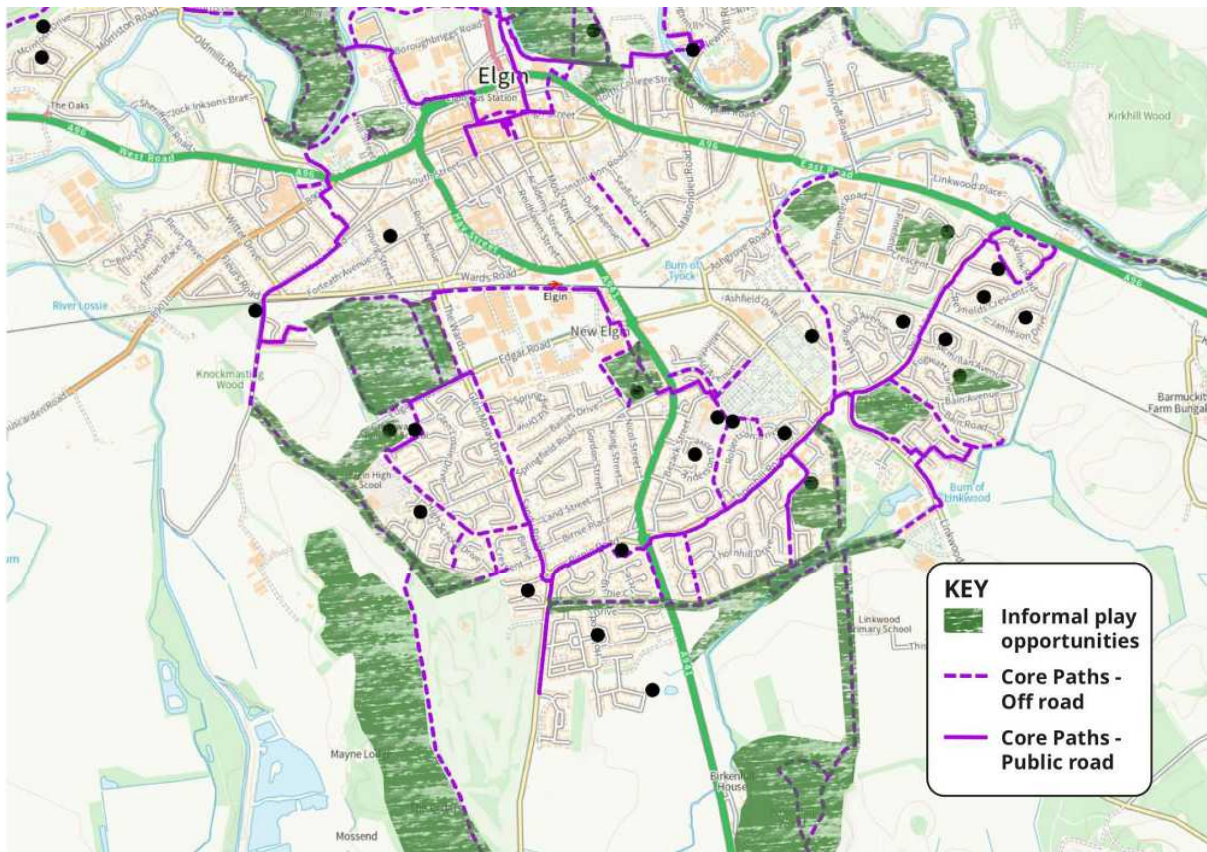
Woodlands around Elgin provide opportunities for informal play these include the Oak Wood, Quarrel Woods, Marleon/Lesmurdie Wood, Maggot Wood, Mayne Wood and Birkenhill Wood. These woodlands provide opportunities for informal play including potential for tree climbing/swinging, den building, sign posted walks and mountain bike trails. Parts of Quarrel Woods have a fairy village set out along the paths. Children also told us that they travel to Findrassie Woods to play. The green corridor along the River Lossie provides a variety of informal play opportunities. These include cycling on the flood alleviation cycle paths, playing and den making in the woodlands around Morriston playing fields, running and games along the open areas at Borough Briggs, connecting with nature along the river banks and informal play opportunities within the Biblical Gardens. This corridor also links key recreational and play spaces like Morriston playing fields, Moray Leisure Centre, Cooper Park and the Biblical Gardens. Along the Linkwood Burn informal play opportunities include rope swings, tree climbing and walking routes. Another key natural space is The Wards Wildlife Site where there is a path network with opportunities to connect with nature including pond dipping.

Playing fields at Morriston Playing fields, Bishopmill Primary School, Bremner Drive Playing Field, Deanshaugh, Cooper Park, Borough Briggs, West End Primary School, Doocot Park, Elgin High School, and Thornhill provide opportunities to round around, play games, have a kickabout or other sports when these are not being used by clubs/school. Amenity greenspace also provide some limited play opportunities including space to run around. In Elgin these spaces include the Duffus Heights amenity area, amenity space around Covesea Rise, amenity land between Marleon Field and Chandlers Rise, Pinefield, and Fairway Avenue.
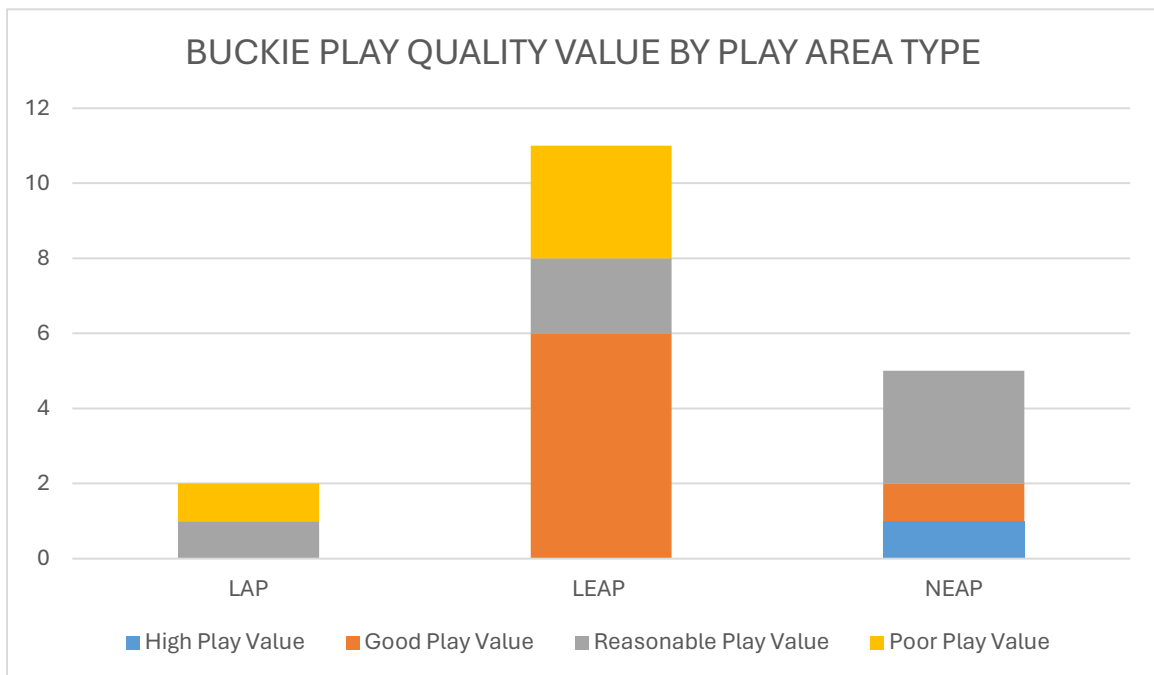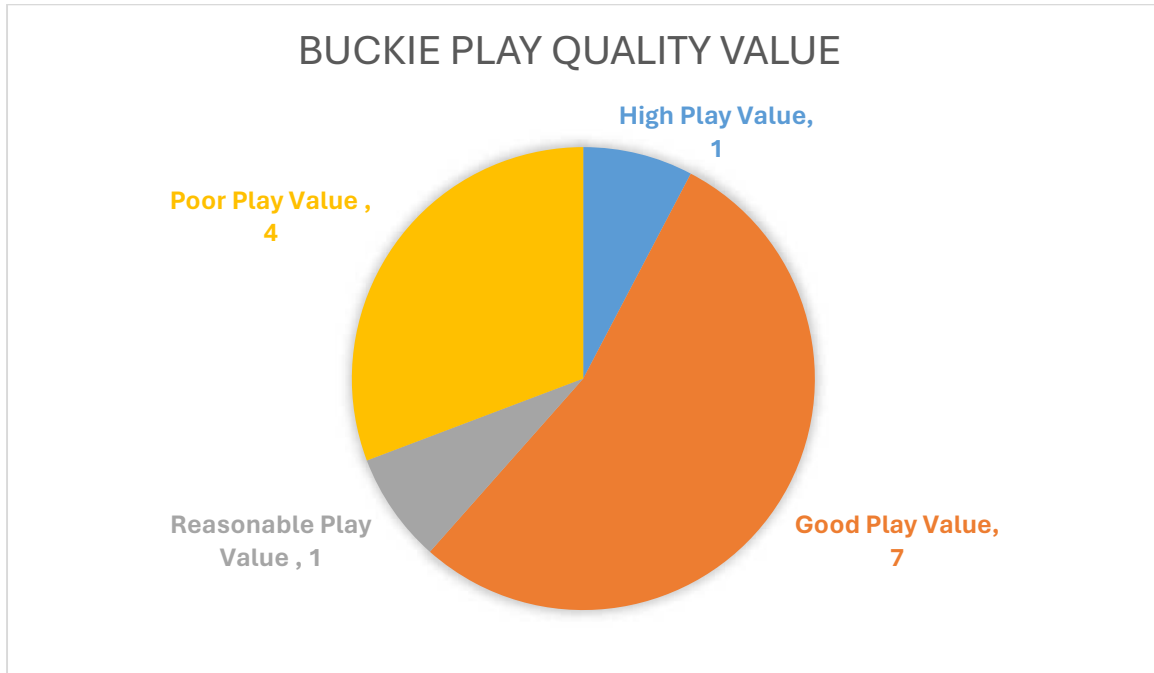
14

BUCKIE

Buckie Equipped Play Areas

A total of 13 equipped play areas were identified in Buckie which are broken down by type below. Eight of these are managed by Moray Council.

**BUCKIE EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)**
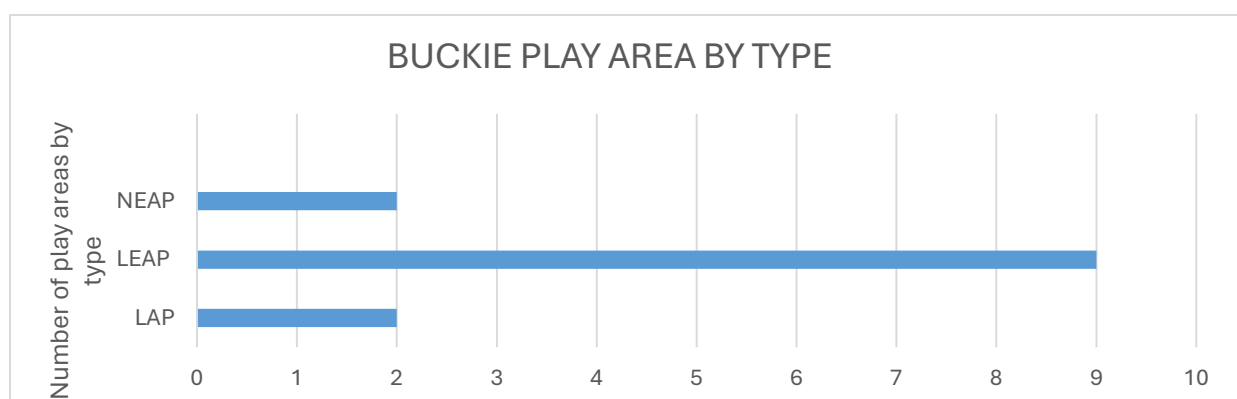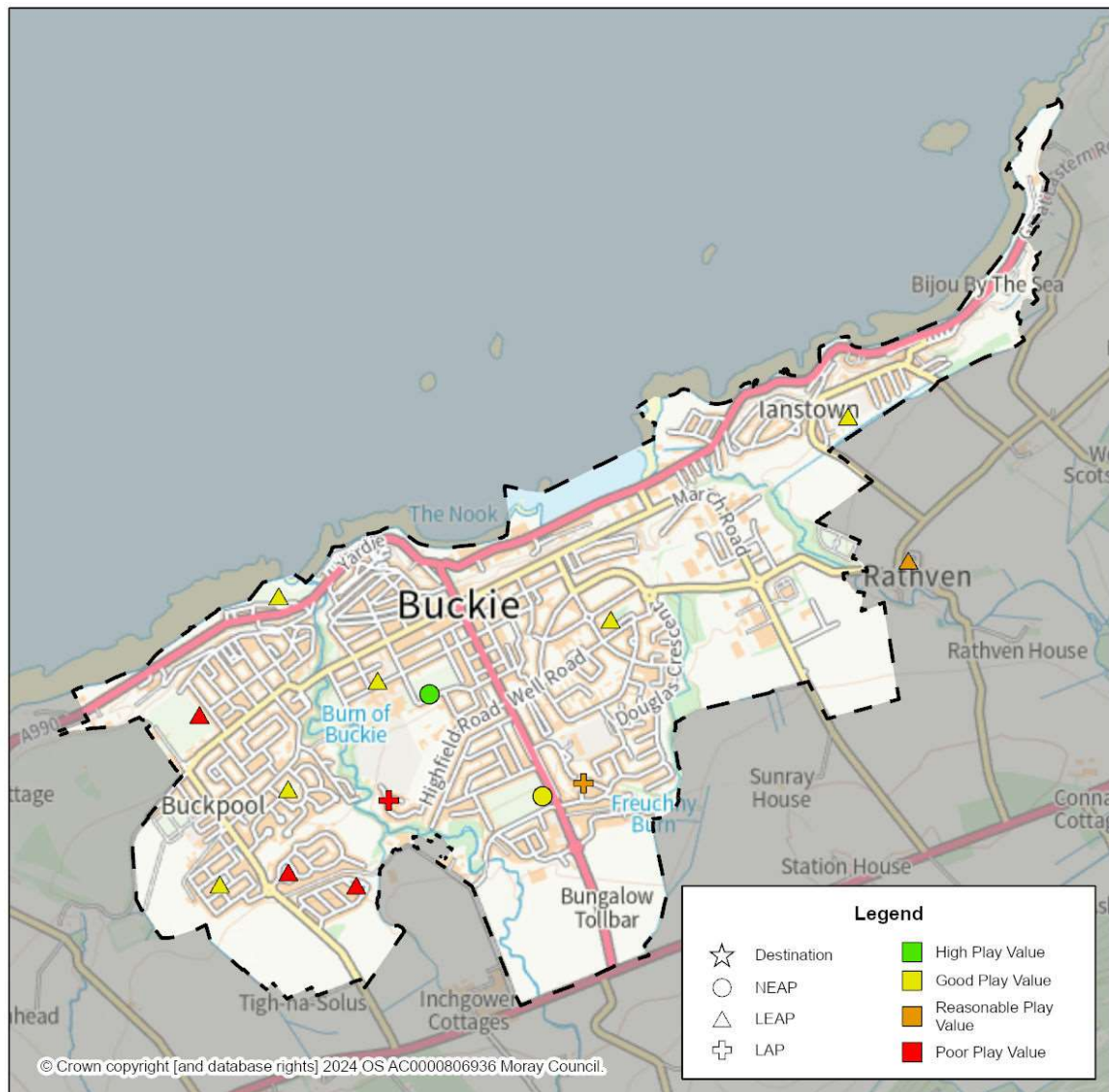
Four equipped play areas were identified as having poor quality play value and one as having reasonable quality play value. One space was considered to offer a high-quality play value experience with seven scoring good quality play value. The space scoring high was Ian Johnston.

BUCKIE PLAY QUALITY VALUE

High Play Value, 1

Poor Play Value , 4

Reasonable Play Value , 1

Good Play Value, 7

BUCKIE PLAY QUALITY VALUE BY PLAY AREA TYPE

	LAP	LEAP	NEAP

- High Play Value
- Good Play Value
- Reasonable Play Value
- Poor Play Value

16

Within Buckie approximately 5.5% of households are not within a reasonable walking to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). The main area out with a walking catchment to reasonable or better equipped play space is to the east of Buckie harbour around Blantyre Street and around Aboyne/Richmond and Grant Street with more easterly parts of Craigbo and Portessie also falling out with walking catchments. Further east at Strathlene households are also out with walking catchments.

BUCKIE WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES
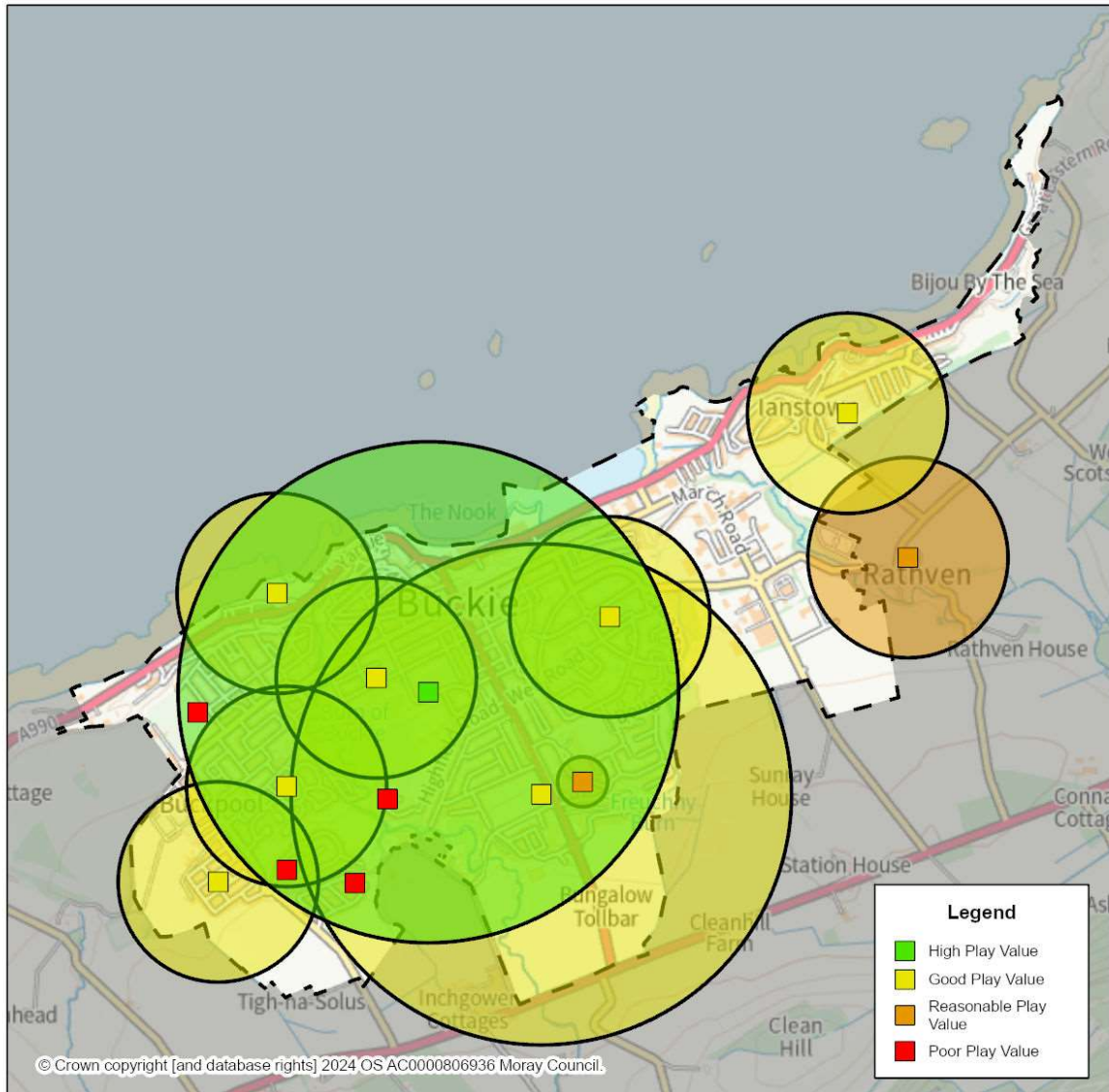
Buckie Informal Play Opportunities

In Buckie informal play opportunities are largely made up of amenity greenspaces, green corridors and natural spaces along the coast.

BUCKIE INFORMAL PLAY OPPORTUNTIES

The three burn corridors, Burn of Buckie, Freuchny Burn and Rathven Burn provide some opportunities for informal play with routes through riparian woodland including tree climbing, den building and opportunities to connect with nature. However, the play opportunities are restricted due to the steep gradients. Former railways east to west through the town have created corridors that incorporate amenity greenspace and walking and cycle routes connecting to the countryside and coast. Informal play opportunities include green areas to run around and play in with small fenced amenity spaces with seating on Carlton Terrace. To the south east the former railway line has created a green corridor that links to Millbank Primary School. This space could potentially create space to play ball games or run around. Playing fields at Buckie High School, Merson Park, Linzee Gordon Park and Port Essie Primary School provide opportunities for both kickabouts and for sports when not in formal use by schools/clubs. To the east the Coastal Path connects to the beach at Strathlene with opportunities for informal play including sandcastles, rock pools, and paddling. To the west the shore line is rockier providing opportunities to explore rock pools where the shore is accessible and some limited play opportunities along the coastal path where drying greens provide some opportunity to run around and play games. Queen Street Gardens are more formal gardens with part of this a community orchard.
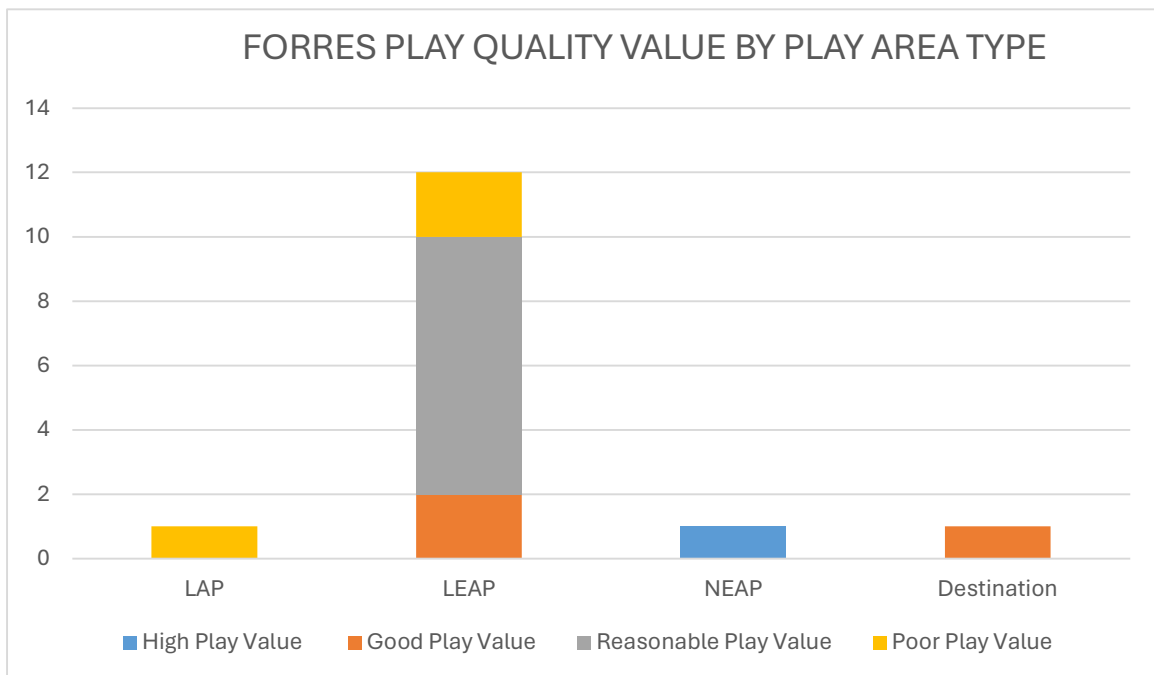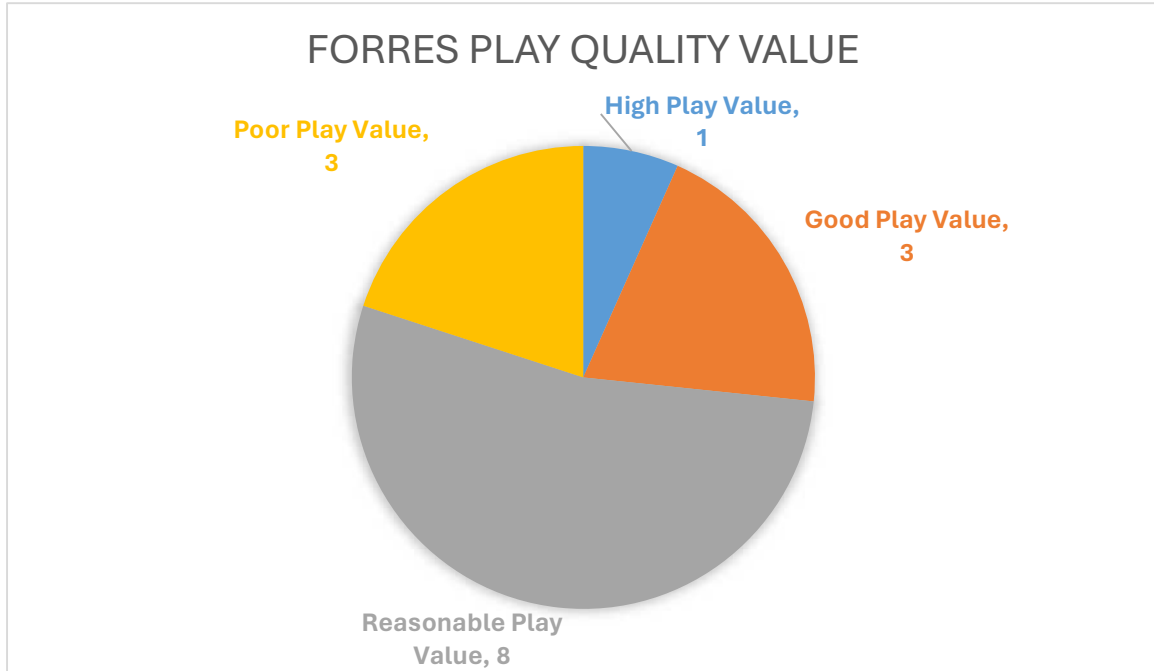
FORRES

Forres Equipped Play Areas

A total of 15 equipped play areas were identified in Forres. Ten of these are managed by Moray Council.

FORRES EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)


FORRES PLAY AREA TYPE
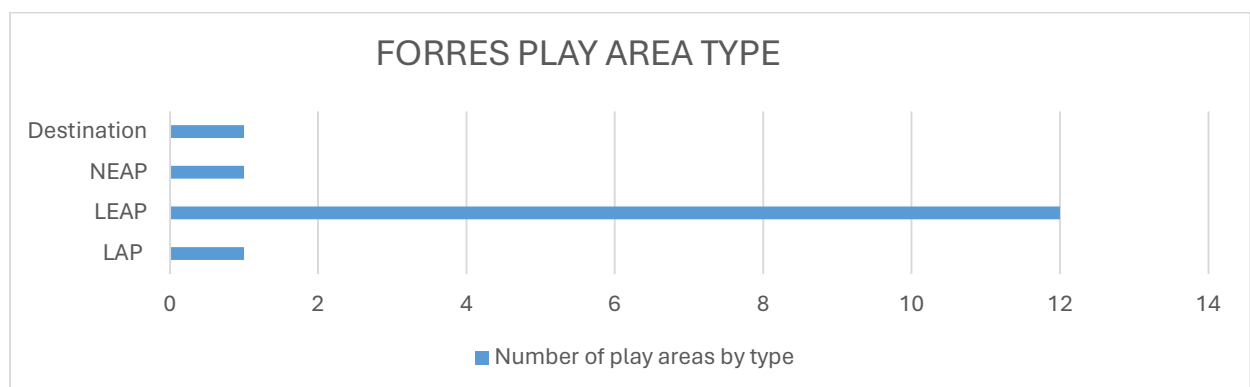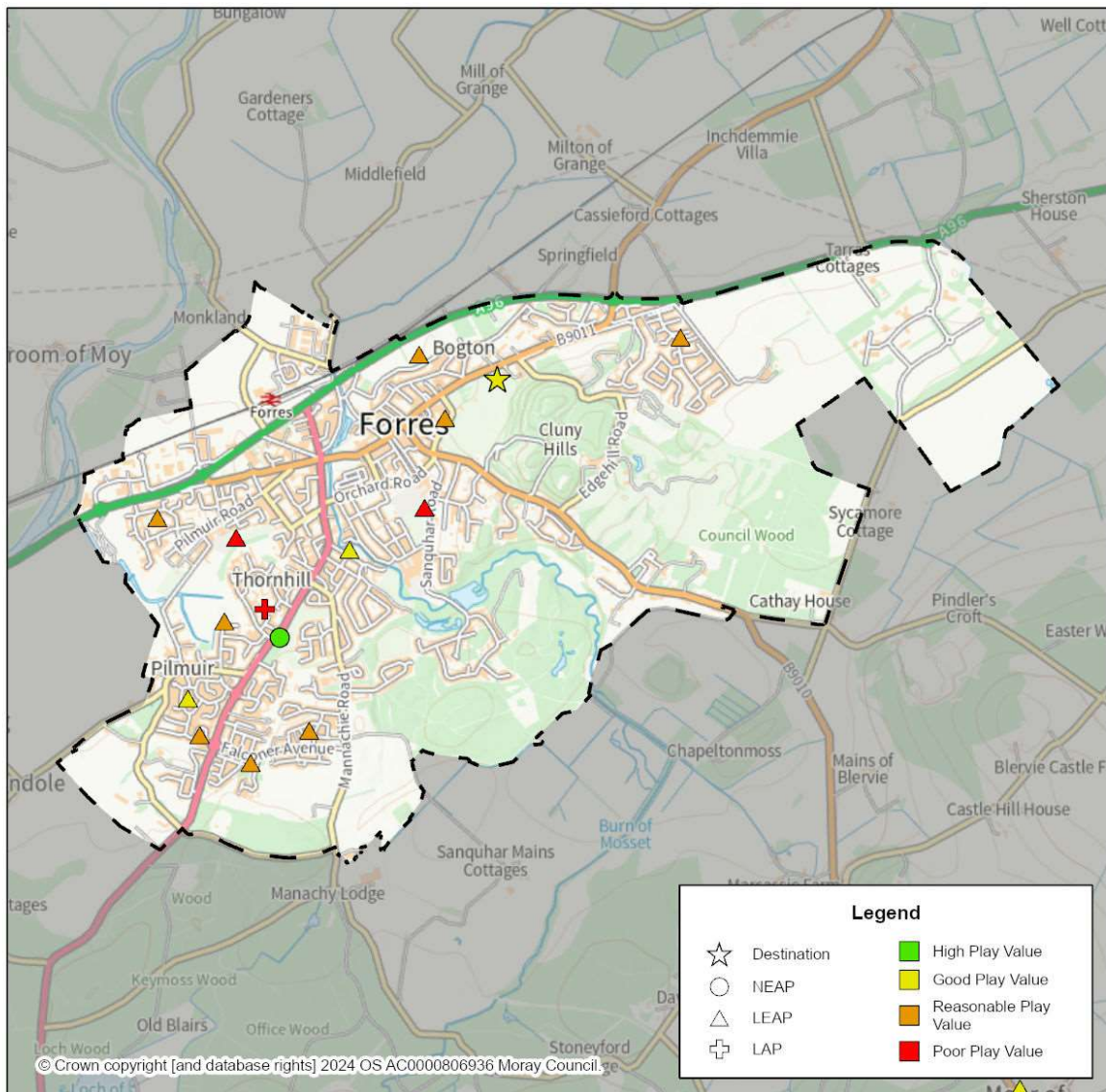
Three equipped play areas were identified as having poor quality play value and eight as having reasonable quality play value. One space was considered to offer a high-quality play value experience with three scoring good quality play value. The space scoring high was the recently replaced Mannachie park.

FORRES PLAY QUALITY VALUE

FORRES PLAY QUALITY VALUE BY PLAY AREA TYPE

20

Within Forres approximately 3.6% of households are not within a reasonable walking distance to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). Areas out with a walking catchment to a reasonable or better equipped space include the eastern parts of St Leonards Road (east of Leanchoil) and eastern parts of Woodside Drive/Park. However, it is noted these areas have very good access to informal play opportunities within woodlands. There is a small area to the west of Market Street where parts of some streets just fall out with walking catchments for a number of play parks.
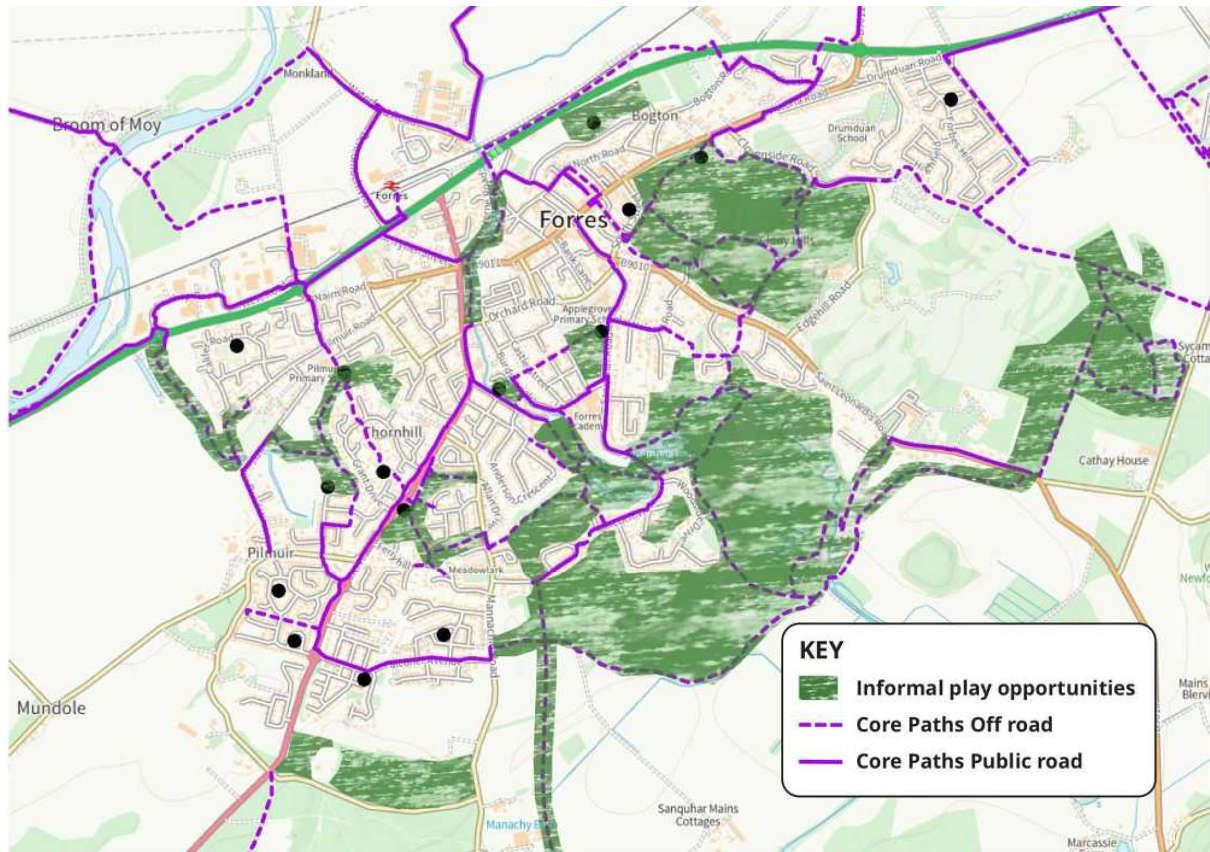
FORRES WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES
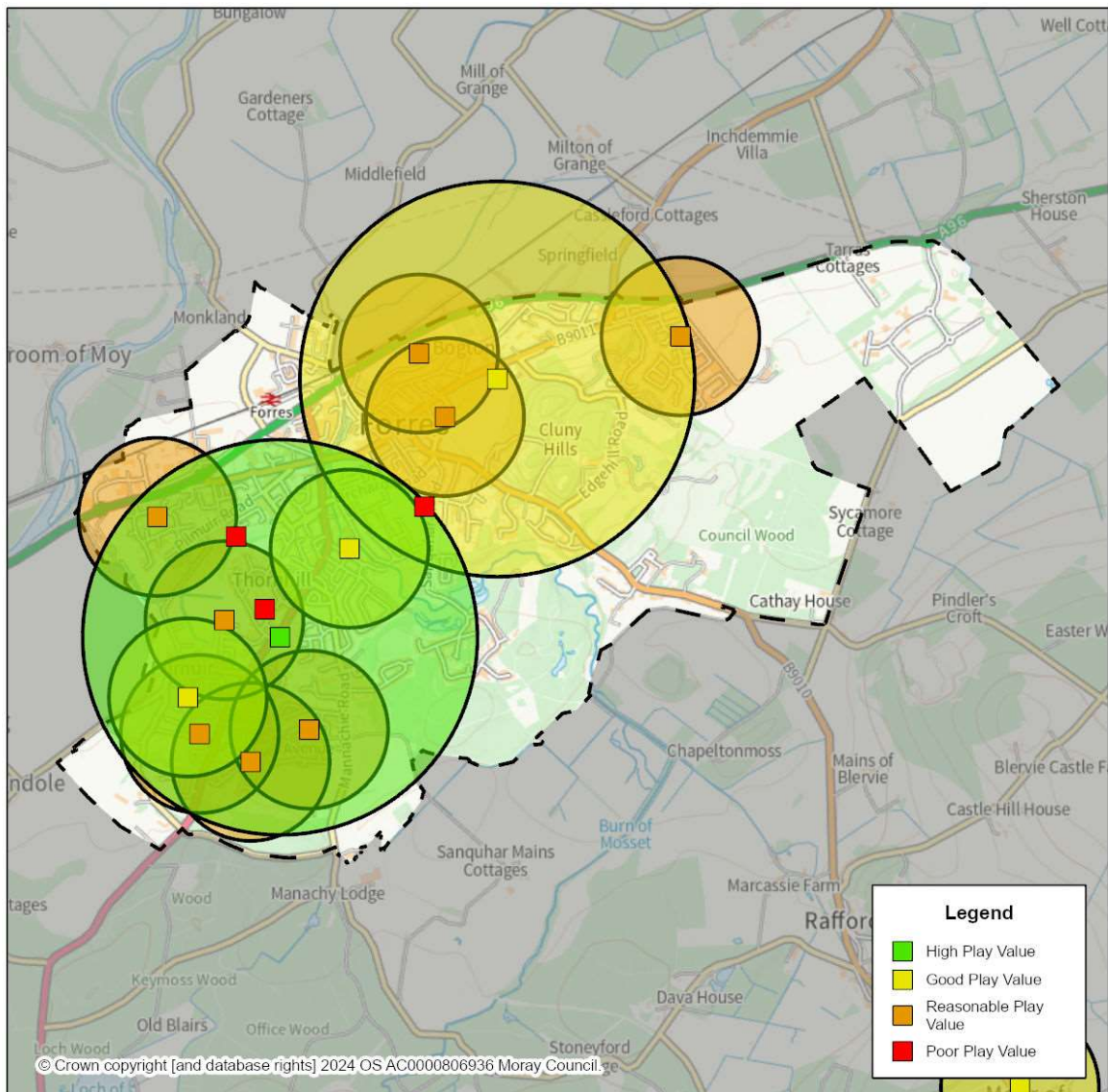
Forres Informal Play Opportunities

In Forres informal play opportunities are largely made up of amenity greenspace, green corridors, and natural spaces that are designated ENV within the LDP.

FORRES INFORMAL PLAY OPPORTUNTIES

Woodland at Cluny Hill provides opportunities for informal play close to and easily accessible from Grant Park. In the south of Forres Sanquhar Loch and Wood is an extensive area of mixed woodland with tracks, benches and picnic areas located throughout. To the east of Forres Muiry/Council Wood is another woodland with sign posted routes. This and parts of Sanquahr Wood are owned and managed by the Forres Community Woodlands Trust with one of their aims being to promote the woodlands as a highly valued environmental and educational asset. This includes school and nursery groups visiting the woodlands. Sanquhar, Muiry and Cluny Hill provide many opportunities for informal play including potential for tree climbing/swinging, den building, sign posted walks and mountain bike trails. Benches and picnic areas also provide spaces to hangout and meet up with friends. Fairyhill Woods to the south of the Ferrylea neighbourhood provides similar opportunities for informal play with a less formalised path network.

Playing fields at Roysvale, at Randolph Lane, at Thornhill (behind the medical practice), at Bogton, at Fleurs Place and the Forres Academy playing fields provide opportunities for both kickabouts and for sports. Parts of the flood alleviation scheme to the west of Forres provide opportunities for walks and to cycle. Through the centre of Forres the green corridor along the Mosset Burn provides opportunities to connect with nature and in some parts space to run around and play games like hide and seek. Equipped play parks like Grant Park, Mannachie, Bogton and the play area to the west of Thornhill are set within wider open spaces that provide opportunities for informal play.

22

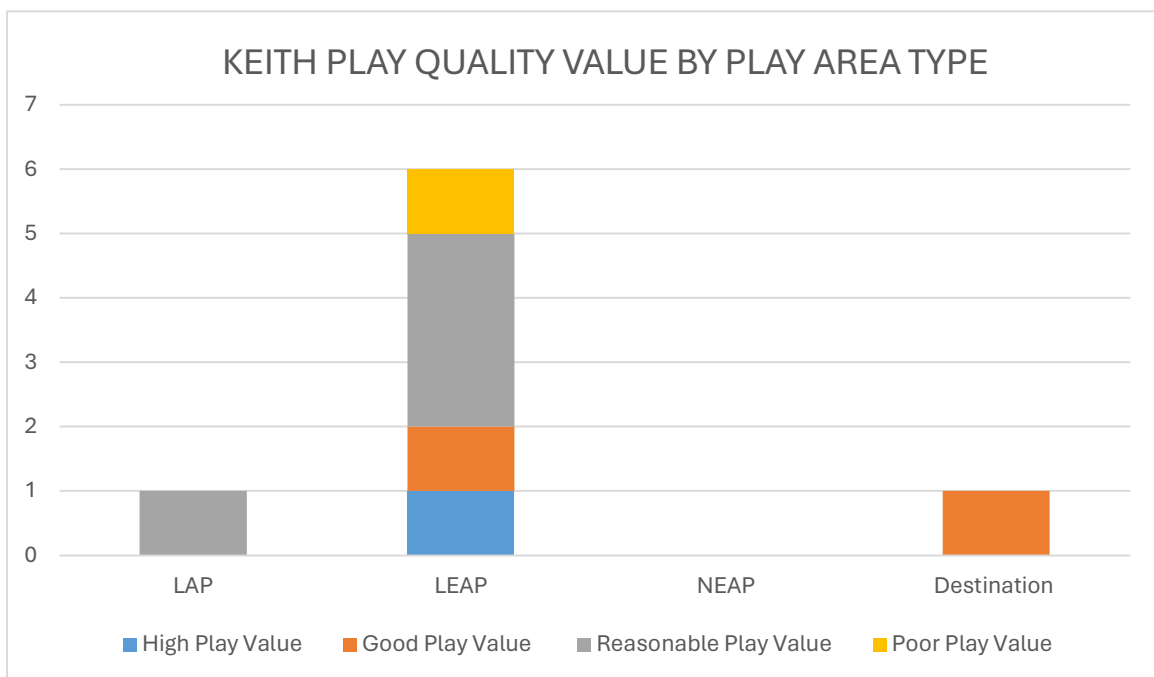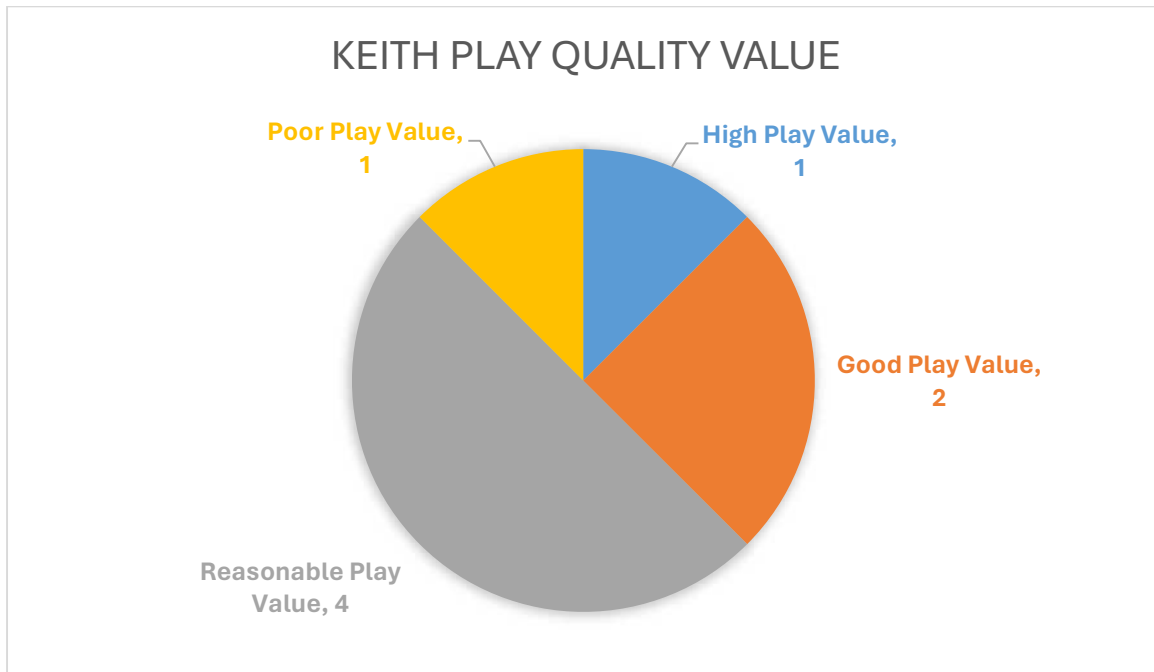**KEITH**

Keith Equipped Play Areas

Eight equipped play spaces were identified in Keith. Six of these are managed by Moray Council.

KEITH EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
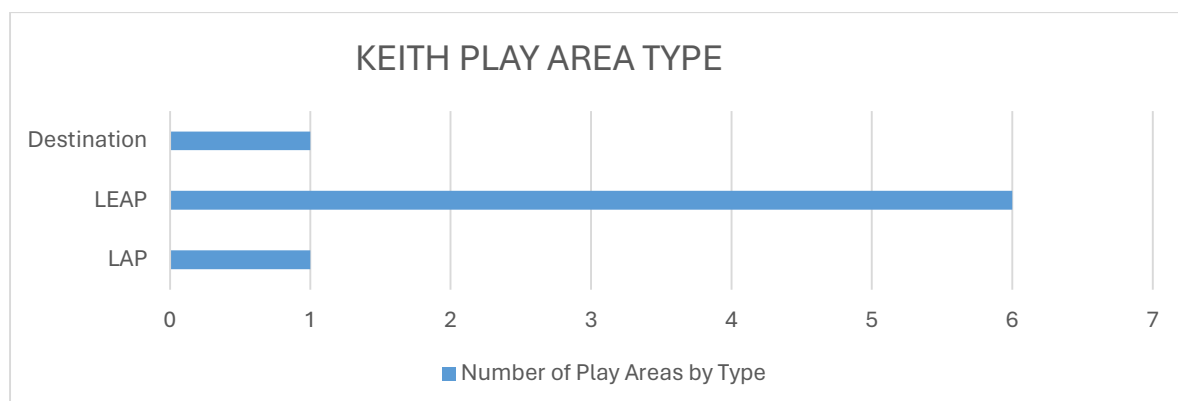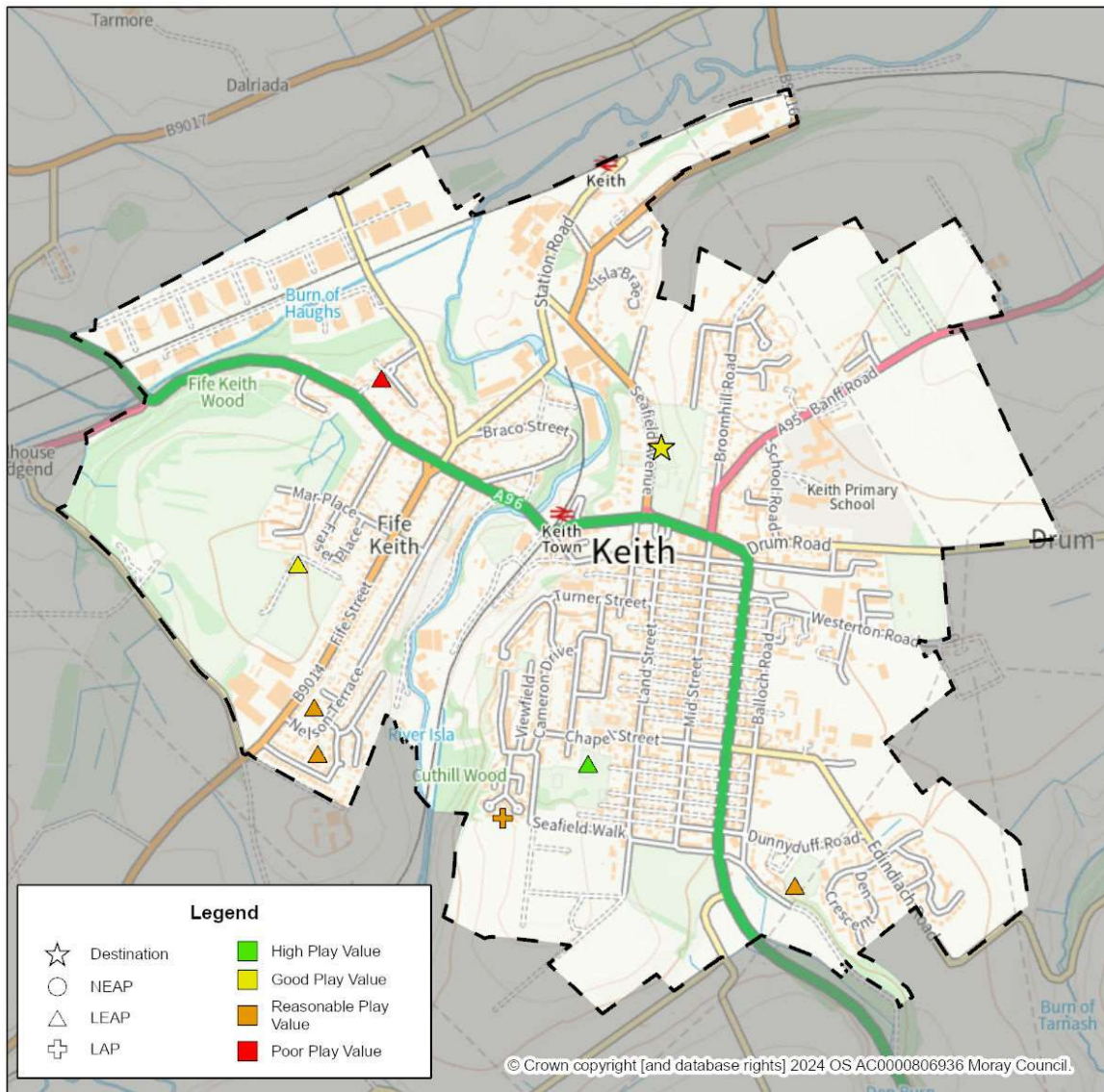
One equipped play area was identified as having poor quality play value and four as having reasonable quality play value. One space was considered to offer a high-quality play value experience with two scoring good quality play value. The space scoring high was the Cuthil Park which includes a skate park and playing field.

KEITH PLAY QUALITY VALUE

Poor Play Value, 1

High Play Value, 1

Good Play Value, 2

Reasonable Play Value, 4

KEITH PLAY QUALITY VALUE BY PLAY AREA TYPE

| | LAP | LEAP | NEAP | Destination |

■ High Play Value   ■ Good Play Value   ■ Reasonable Play Value   ■ Poor Play Value

24

Within Keith only a handful of households (less than 5) are not within a reasonable walking distance to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). However, it is noted that whilst south and west of Keith have a number of smaller parks central and eastern Keith are primarily served by St Rufus Park only. This is a Destination Park with a 1km walking catchment. This distance could limit visits by younger children and be barrier to children accessing the play space independently particularly given the busy roads that may require to be crossed. It is noted that play provision (primarily aimed at younger children) will be included within the Banff Road housing development.

KEITH WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES
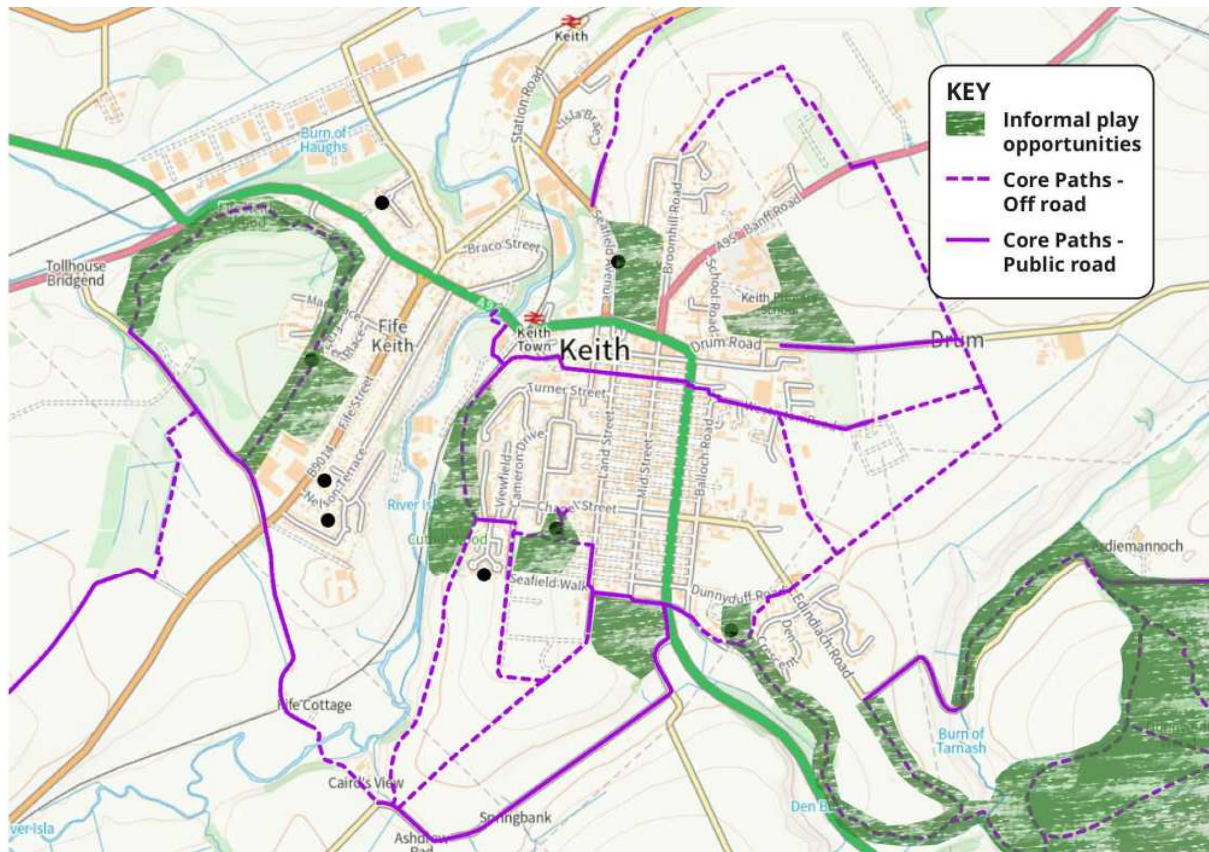

25
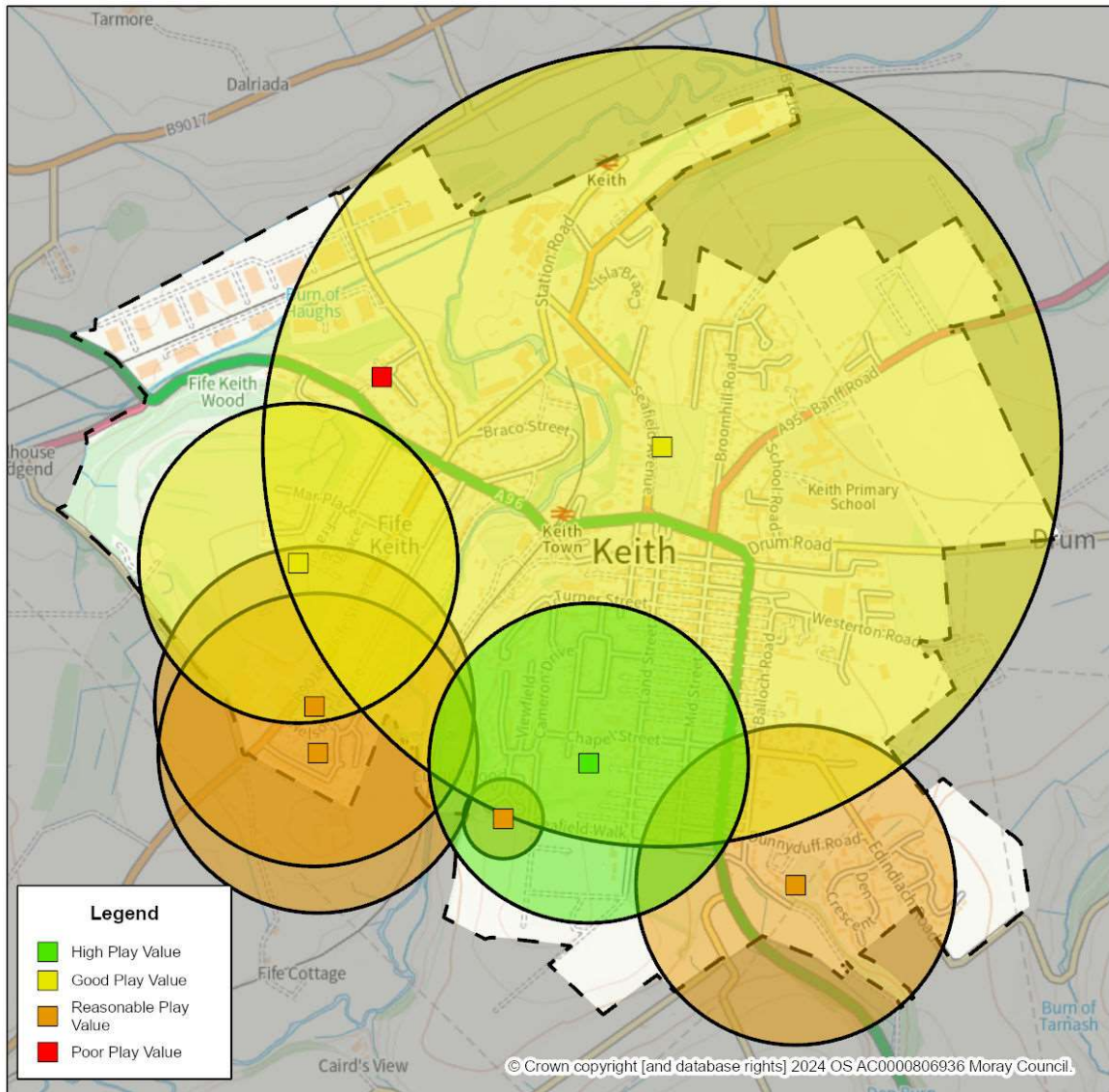
Keith Informal Play Opportunities

In Keith informal play opportunities are largely made up of amenity greenspace, green corridors, and natural spaces that are designated ENV within the LDP.

KEITH INFORMAL PLAY OPPORTUNTIES

Cuthil Wood, Fife Keith Woods and the woodland strip at the Den provide opportunities for informal play. The informal play opportunities include potential for tree climbing/swinging, den building, connecting to nature and sign posted walks and mountain biking. The River Isla corridor extends through the town however the play opportunities are limited with steep topography and access restrictions limiting opportunities to around waymarked routes and more open areas. Playing fields at Fife Park, Keith Grammar, Seafield Park, and at Cuthil Park provide opportunities for both kickabouts and for sports when not in formal use by schools/clubs. Equipped play parks like St Rufus Park and Cuthil Park are set within wider open spaces that provide opportunities for informal play. The wider countryside around Keith includes woodlands managed by Forestry and Land Scotland at Dunnyduff. These are some distance from Keith but are accessible on core paths that avoid roads.

26

LOSSIEMOUTH

Lossiemouth Equipped Play Areas

12 equipped play spaces were identified in Lossiemouth. Eight of these were managed by Moray Council with several other play spaces managed by the Ministry of Defence.

LOSSIEMOUTH EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
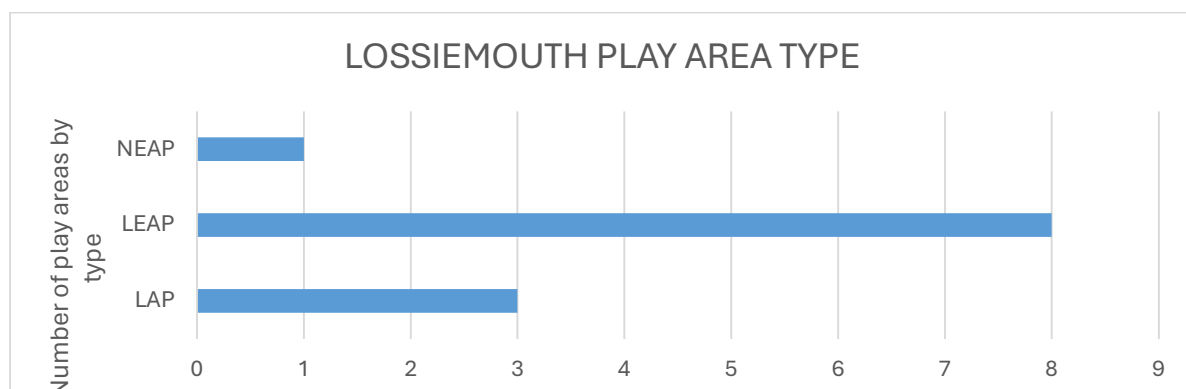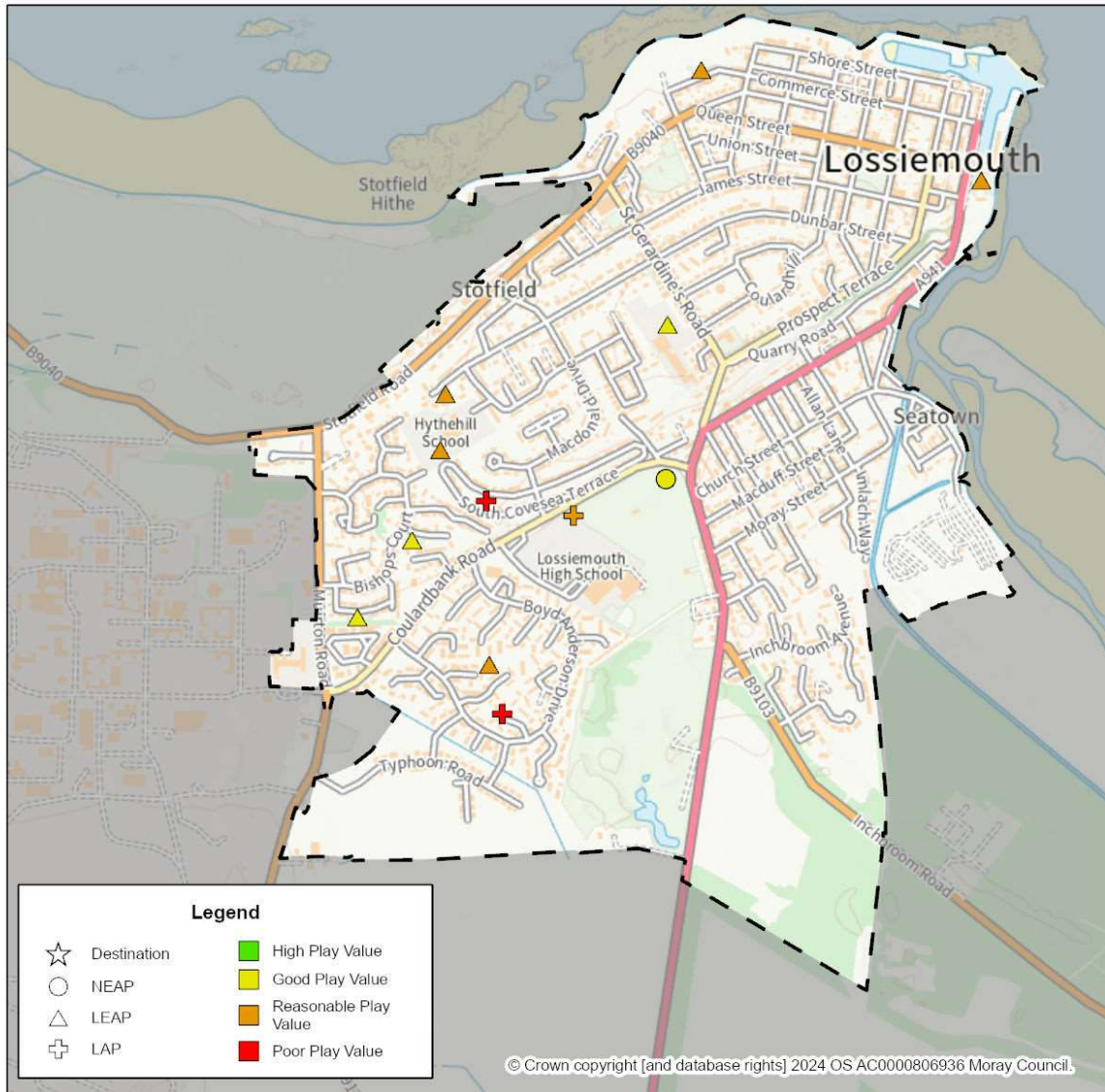
Two equipped play areas were identified as having poor quality play value and six as having reasonable quality play value. Four play areas were considered to have good quality play value. No space scored high.

LOSSIEMOUTH PLAY QUALITY VALUE

Poor Play Value, 2

Good Play Value, 4

Reasonable Play Value, 6

28
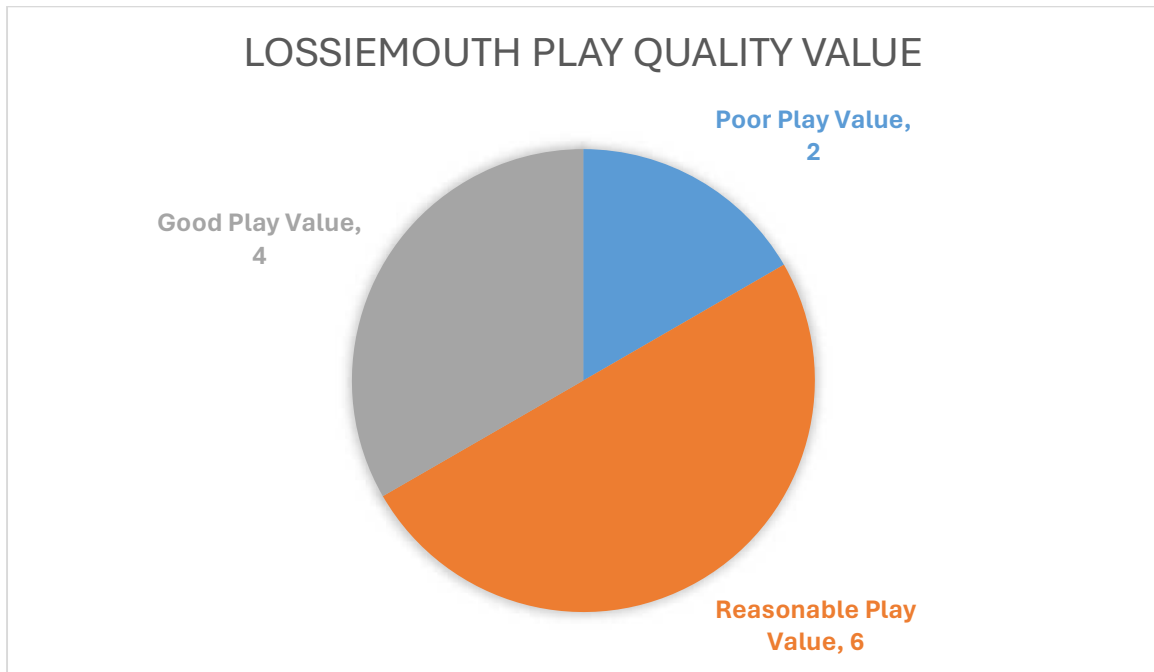
Within Lossiemouth only a handful of households (less than 5) are not within a reasonable walking distance to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). However, whilst the west and north of Lossiemouth are covered by a number of equipped parks the east of Lossiemouth is only within the catchment of the NEAP at the High School playing fields. For many households' access to this space would involve crossing Elgin Road. This includes households from Inchbroom Avenue, Moray Street, Macduff Street, Seatown, Hillocks Way and Gilmour Crescent.

LOSSIEMOUTH WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES

29
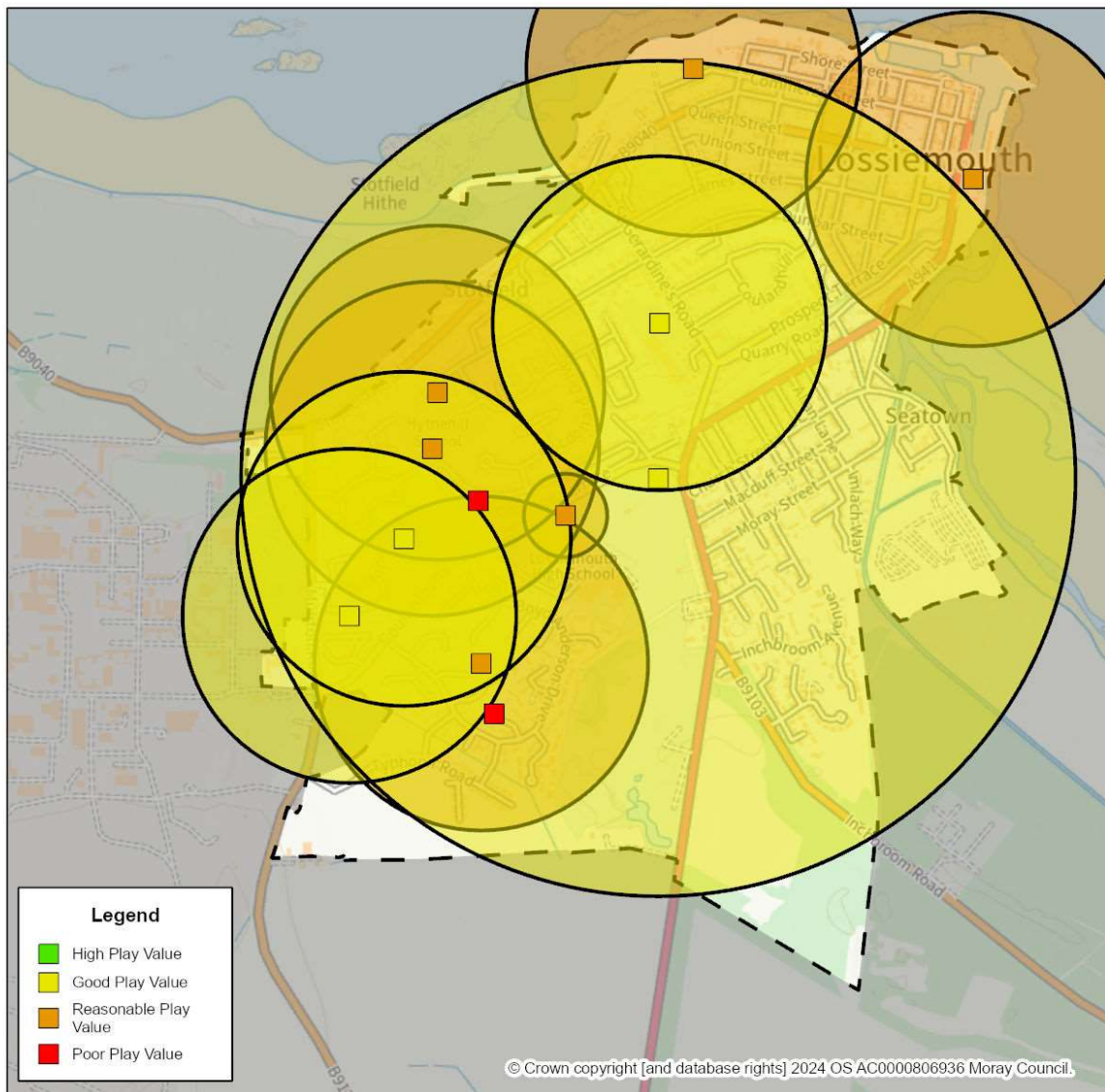
Lossiemouth Informal Play Opportunities

In Lossiemouth informal play opportunities are largely made up of amenity greenspace, green corridors, and natural spaces that are designated ENV within the LDP.

LOSSIEMOUTH INFORMAL PLAY OPPORTUNTIES
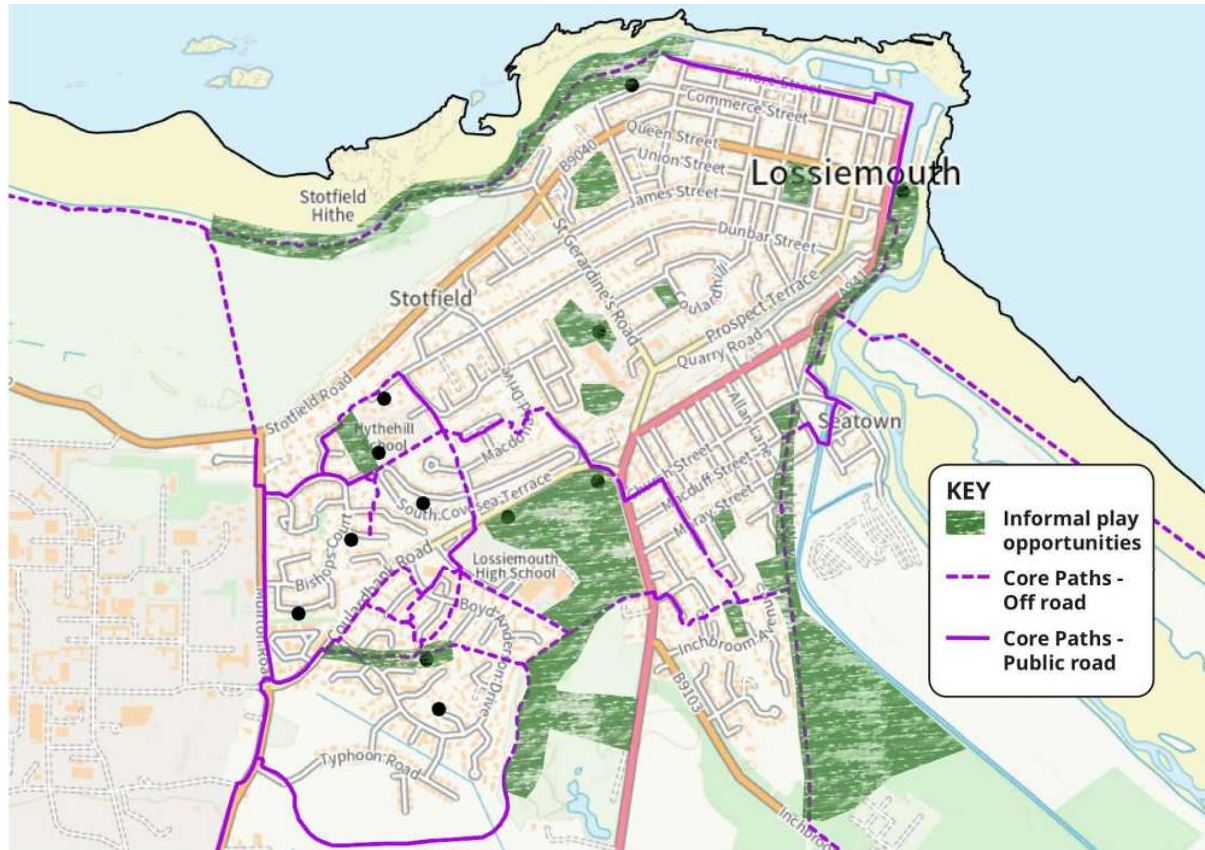
Woodland to the east of Lossiemouth includes informal play opportunities potential for tree climbing/swinging, den building, connecting to nature and sign posted walks and mountain biking. The OPP1 former Sunbank quarry which has started to naturalise is used informally for walks and offers some informal play opportunities. The former railway line provides a route for walking and cycling. Marine Park, Lossiemouth High School, Hythehill School and St Geradine's playing fields provide space for informal kickabout and sports when not being used formally by clubs/schools. Smaller areas of amenity space, for example on Dean Terrace, Moray Street, Coulardhill and Hillocks Way, provide space to run around and play games. The more formal James Square and Market Cross provide more limited play opportunities but offer benches to potentially be used to meet or socialise. The Old Station Park and promenade area has been used for informal skateboarding with the "Station" building potentially providing an informal stage for plays. The esplanade provides a range of benches and picnic area that provide potential to socialise. Lossiemouth provides good access to two sandy beaches with opportunities to play in the dunes, build sandcastles, paddle and opportunities for older children to surf. Equipped play parks like Commerce Street and at the High School Playing fields are set within wider open spaces that provide opportunities for informal play.

ABERLOUR

Aberlour Equipped Play Areas

Three equipped play areas were identified in Aberlour, all of which are managed by Moray Council.

ABERLOUR EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
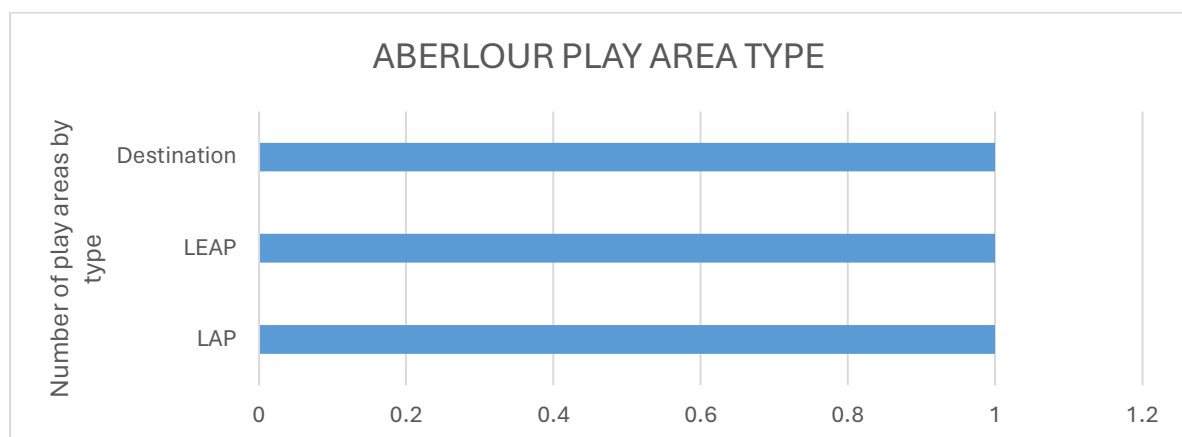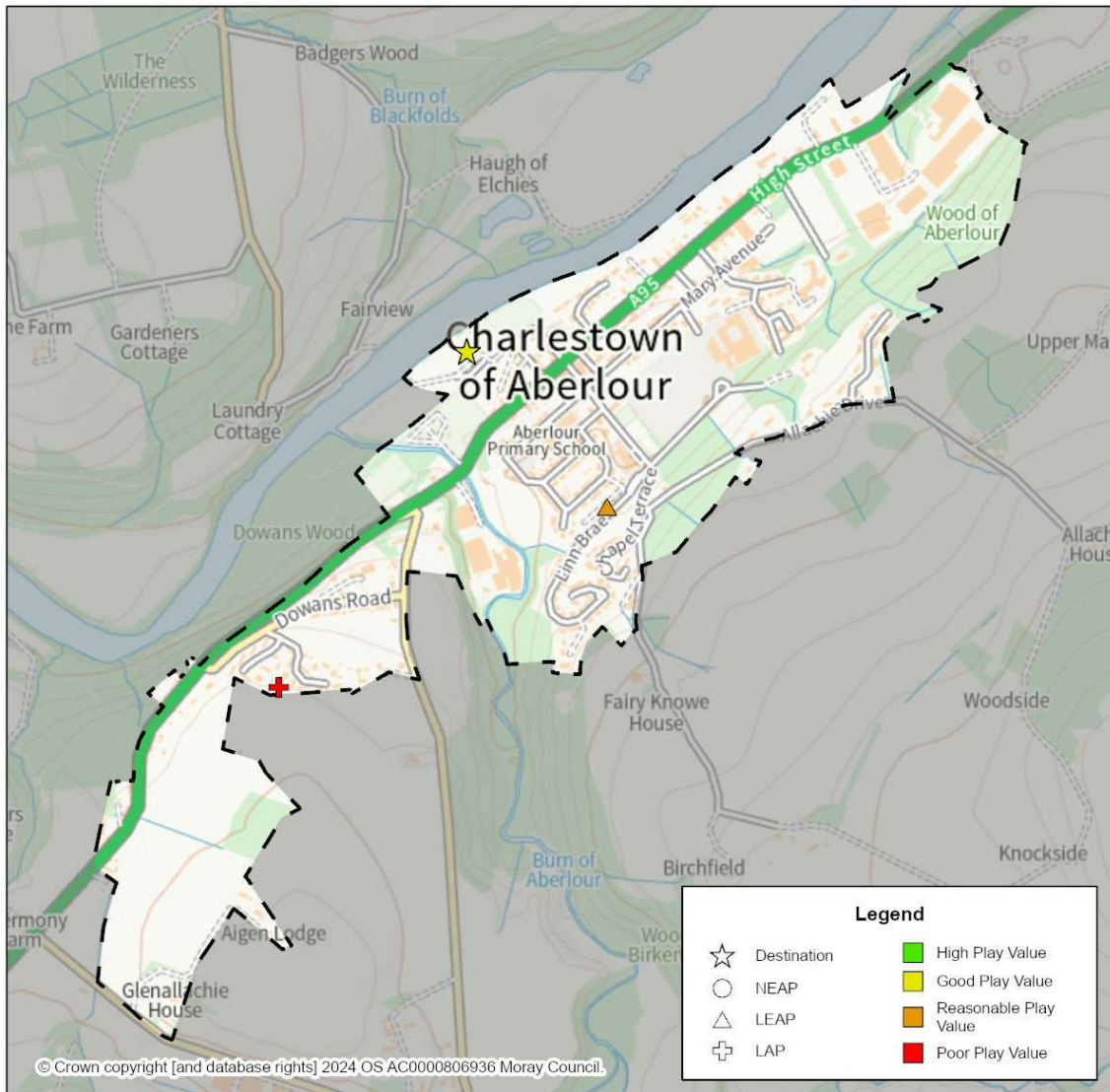
One equipped play area was identified as having poor quality play value and one as having reasonable quality play value. One equipped play area was considered to have good quality play value. No space scored high. The good play area was Alice Littler.

ABERLOUR PLAY QUALITY VALUE

Good Play Value, 1

Reasonable Play Value, 1

Poor Play Value, 1

32

Within Aberlour approximately 4% of households are not within a reasonable walking distance to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). The very far south west of Aberlour along the A95 is out with the walking catchment of a reasonable or better play area. However, it is noted that large parts of Aberlour are only served by Alice Littler Park which is a destination park with many households on the edge of the 1km buffer.

ABERLOUR WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES

33
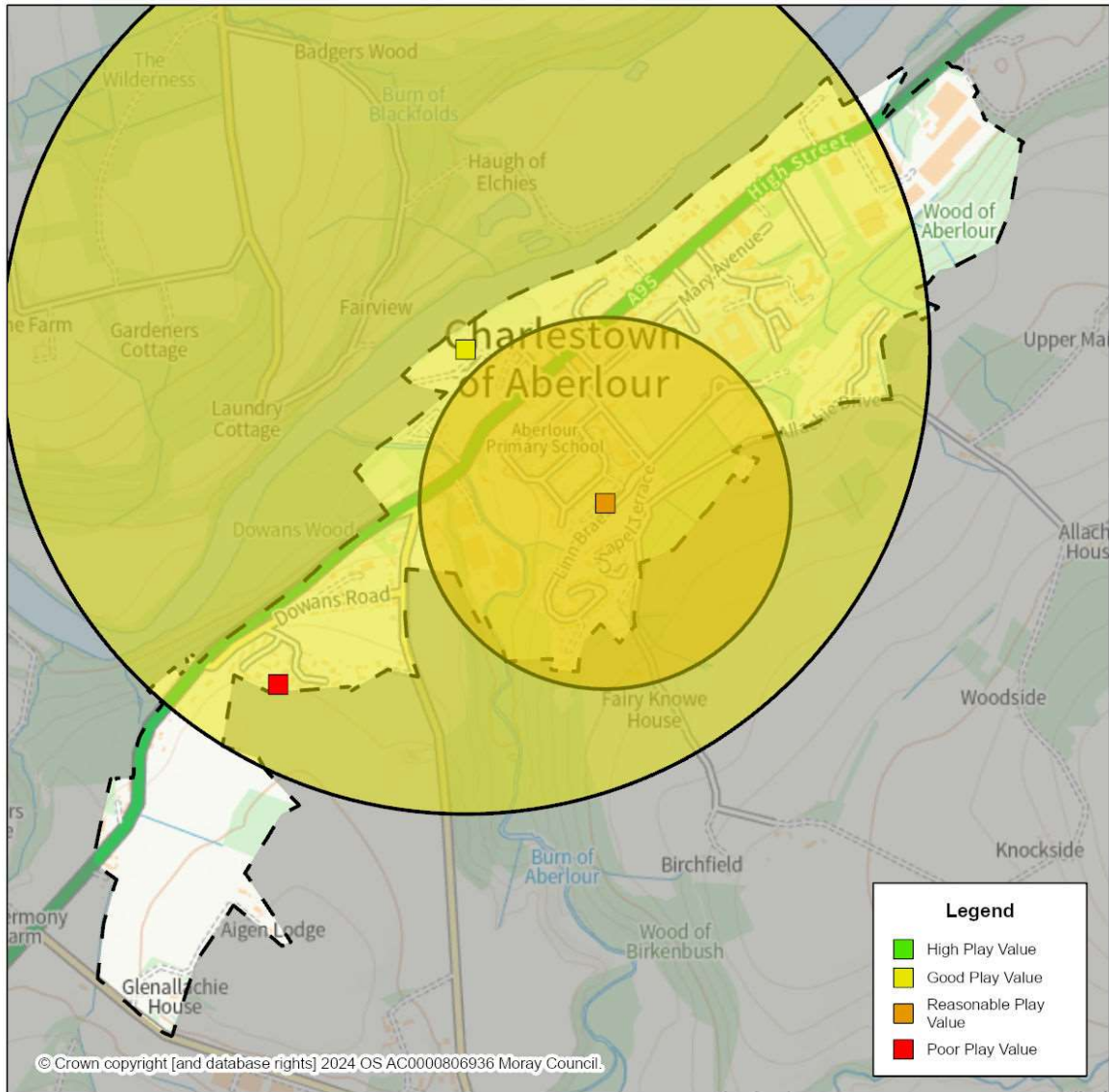
Aberlour Informal Play Opportunities

In Aberlour informal play opportunities are largely made up of woodlands and the green corridor along the River Spey/Speyside Way.

ABERLOUR INFORMAL PLAY OPPORTUNTIES
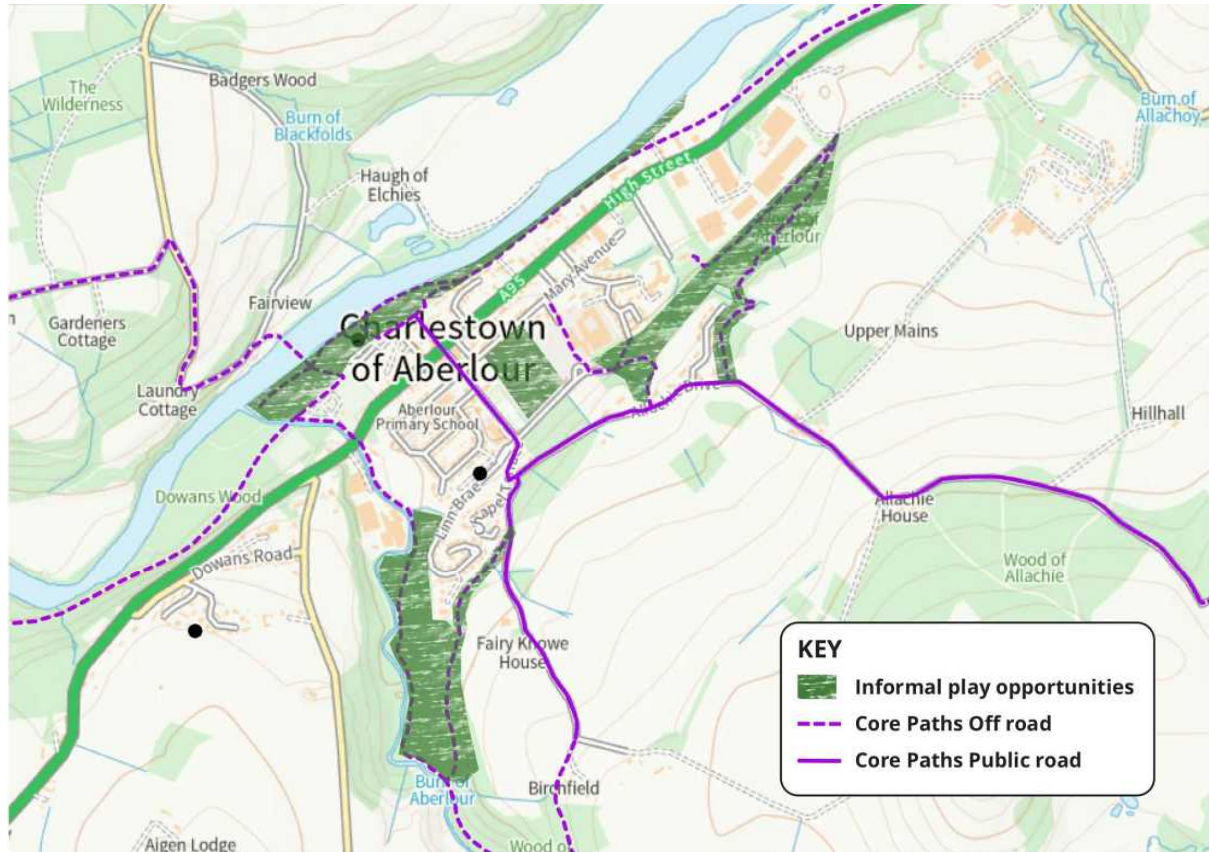
Alice Littler Park includes an equipped play area, but the wider park includes flat areas and areas with tree planting that provide informal play opportunities including space to run around, space for kickabouts, opportunities for games like hide and seek, and waymarked walking and cycling routes. Within the park there are benches and picnic areas which could provide opportunities to socialise and meet up. Due to the steeply sloping banks access to the River Spey is limited. Woodland to the south of Linn Braes provides opportunities for informal paly including tree climbing/swinging, den building, walks and opportunities to connect with nature. A woodland walk leads to Linn Falls where there are opportunities to paddle and splash. Woodland to the south of Walkers factory and around Aberlour House also provide some informal opportunities for play. The gradient of the woodland and land at Braes of Allachie (to the south of Speyside High playing field) means the opportunities for informal play in this area are limited. The playing field at Speyside High School provides opportunity for informal sports and kickabouts when not in use. The wider countryside around Aberlour includes routes like the Speyside Way and core paths to the north and south of the town which connect to woodlands and countryside.

34

FOCHABERS

Fochabers Equipped Play Areas

Two equipped play areas were identified. One is a NEAP at the playing fields which scored high quality play value and is managed by the Council. The other is a small LAP at Milnecroft.

FOCHABERS EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
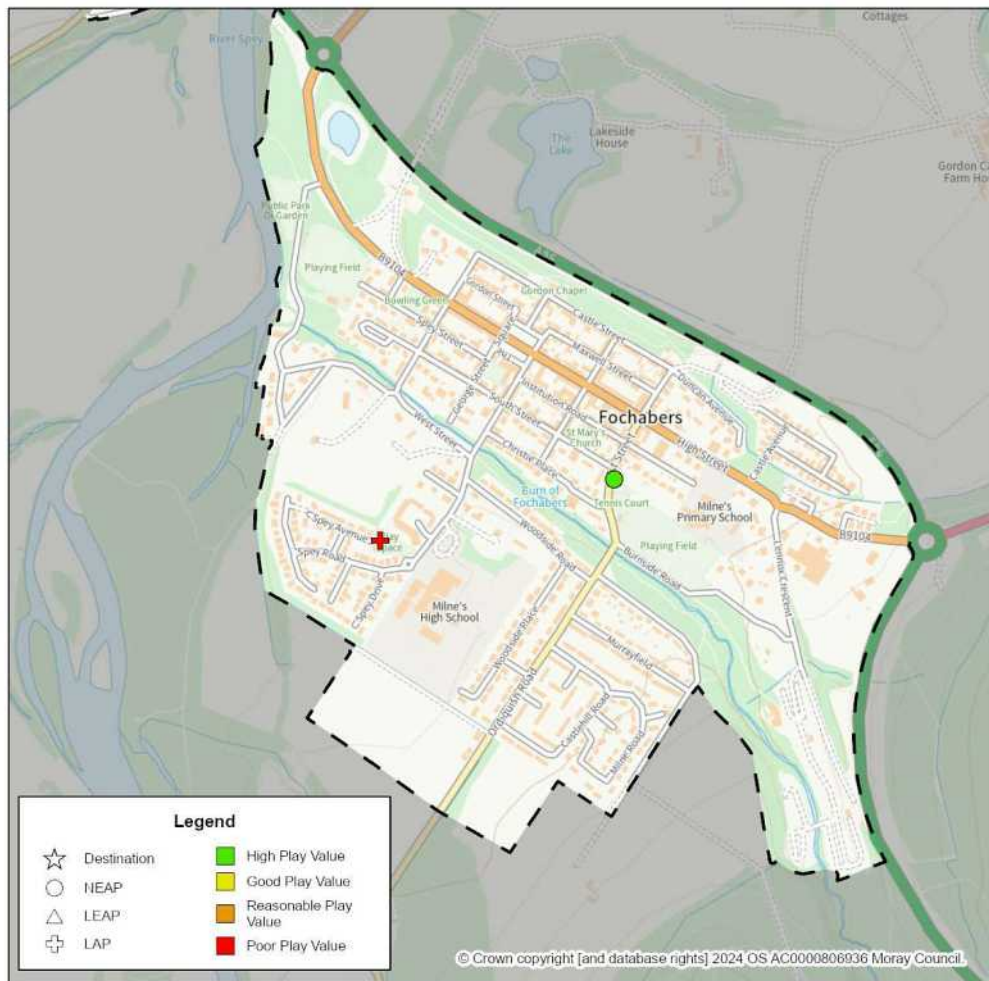
All households within Fochabers are within the 1km buffer/catchment to the park at Fochabers Playing Fields. The number of play spaces within Fochabers is very limited with only a small LAP at Milnecroft and the park at Fochabers playing fields. The low number of play parks was also identified through engagement. This means a significant portion of households are over 400m from an equipped play area.

FOCHABERS WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES
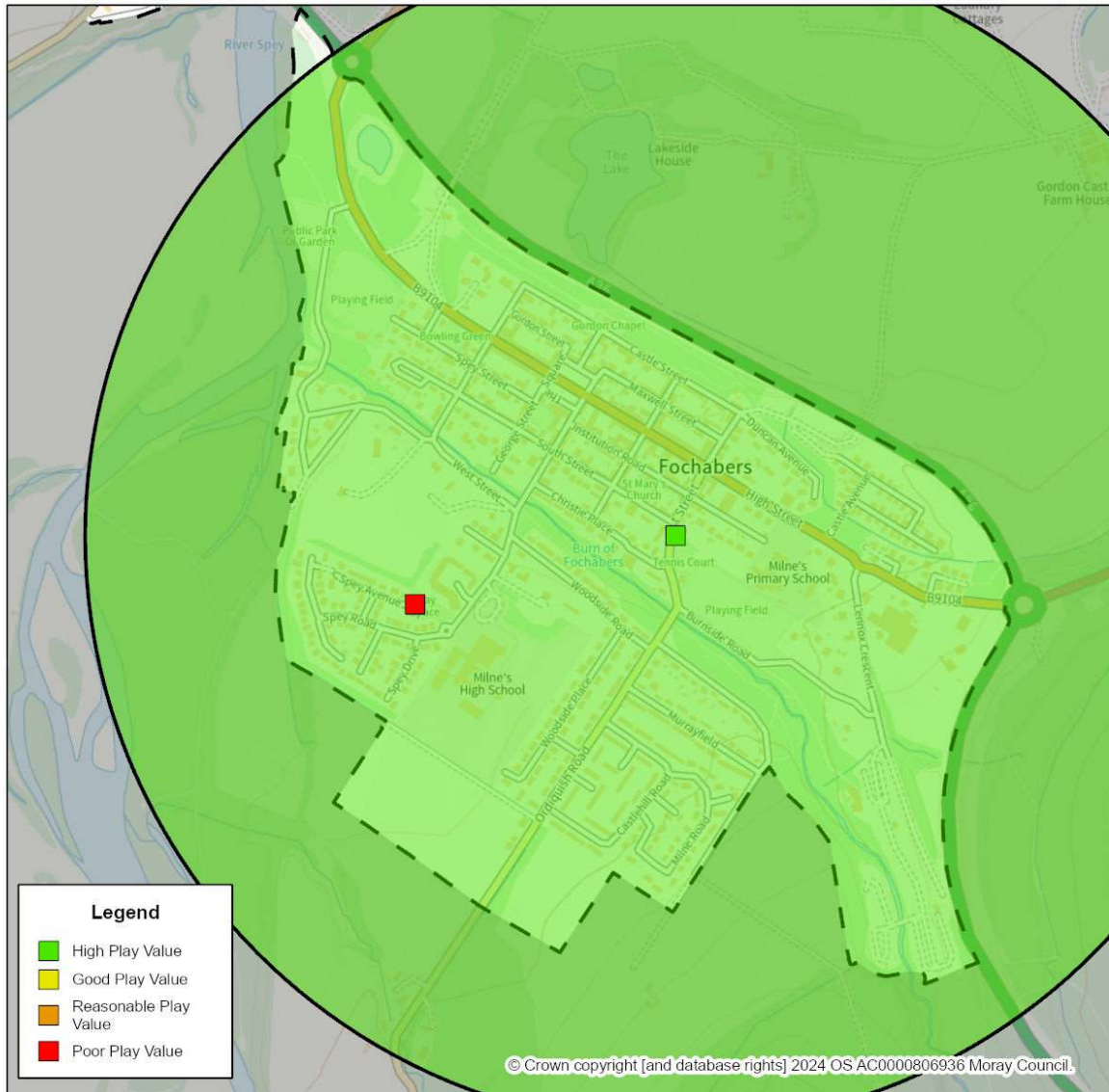
Fochabers Informal Play Opportunities

In Fochabers informal play opportunities include amenity greenspace, green corridors, and natural spaces that are designated ENV within the LDP.

FOCHABERS INFORMAL PLAY OPPRTUNITIES
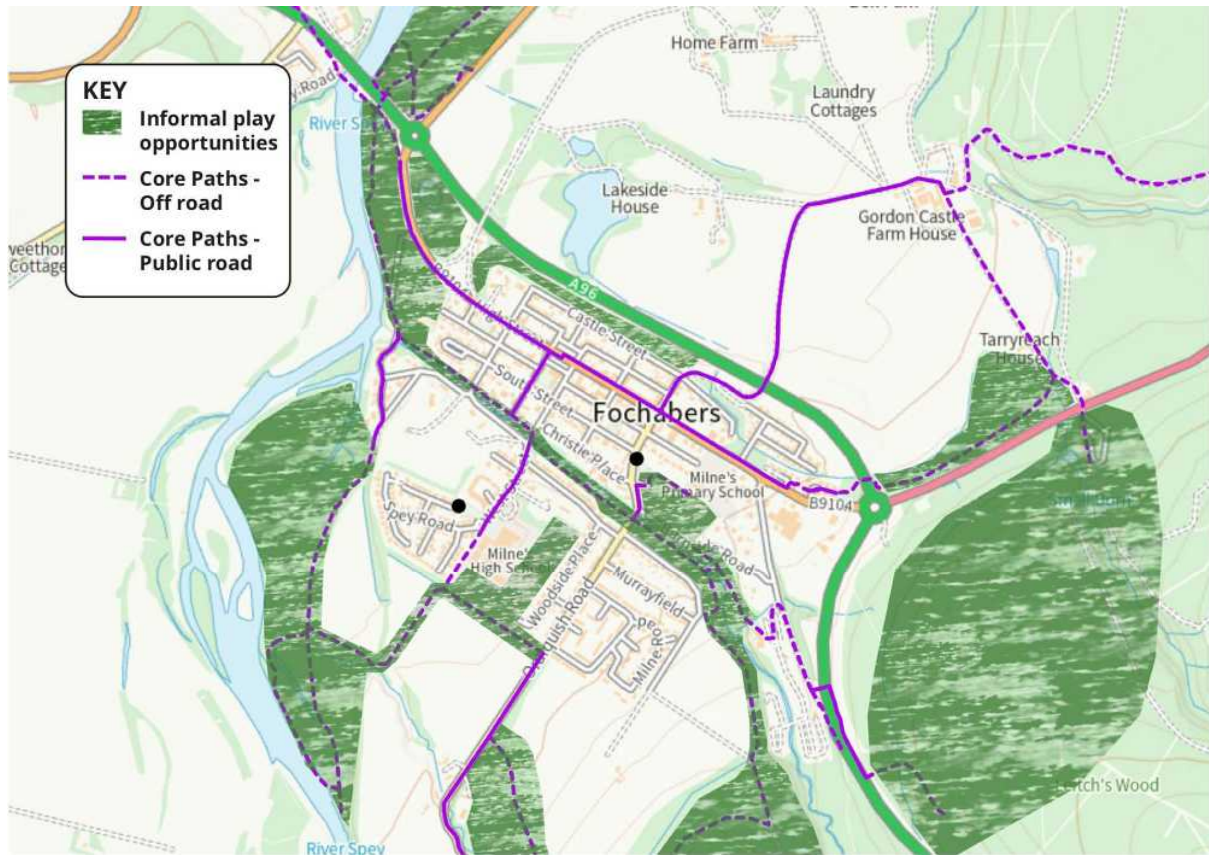
Amenity space to the north of Castle Street includes mature broadleaf trees with grass areas that provide opportunities for informal play including rope swings. Green corridors and natural spaces along the River Spey, Speyside Way and the Burn of Fochabers which include attractive woodland provide opportunities to connect with nature, potential for den building, tree climbing and walks. These also provide opportunities to meet and socialise with benches provided. Children told us they meet friends at "the pinny". Playing fields at Milnes High School also provide opportunity for informal kickabouts out with school hours.

The wider countryside around Fochabers includes woodlands managed by Forestry and Land Scotland. These provide a range of informal play opportunities including den building, mountain bike trails, sign posted walks and opportunities to connect with nature. However, during public consultation children told us that getting to some of the bike tracks involved crossing the A96 which created a barrier to them accessing these independently. To the north of Fochabers are the grounds of Gordon Castle (Gardens and Designed Landscapes) which provide easily accessible walks within the policy style woodland, small lake and castle grounds.

37

MOSSTODLOCH
Mosstodloch Equipped Play Areas

Two play spaces were identified in Mosstodloch both LEAPs. One is managed by Moray Council at Speymouth Hall which scored good. The other play space at Speymouth Drive has reasonable quality play value.

MOSSTODLOCH EQUIPPED PLAY AREA LOCATION (INCLUDING PLAY AREA TYPE AND PLAY QUALITY VALUE)
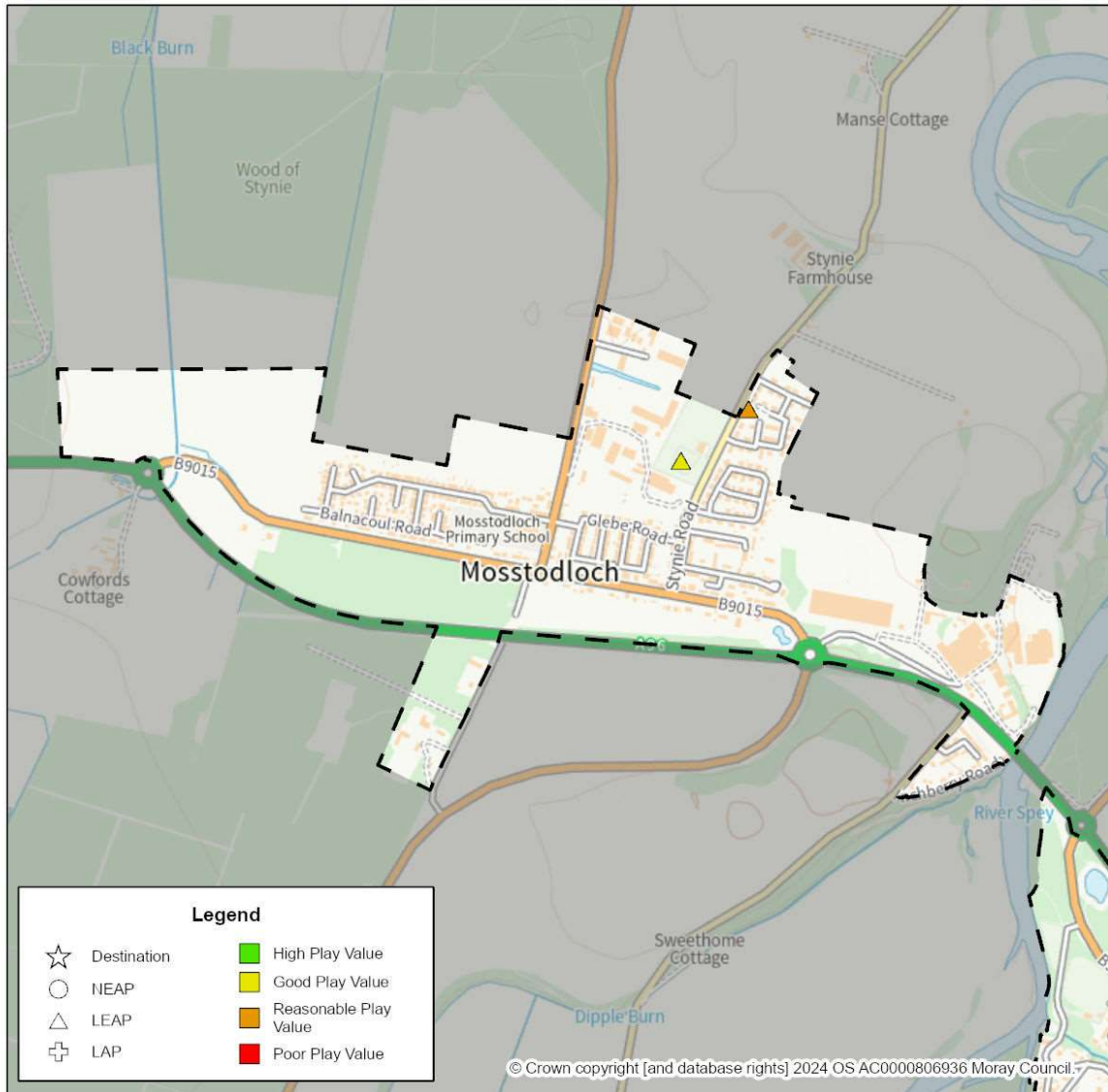
Within Mosstodloch approximately 29% of households are not within a reasonable walking distance to a reasonable quality play value or better equipped play space (based on catchments/buffers set out above). Both the equipped play areas identified are to the east of the village which means that the housing to the west of the Primary School is over 400m from an equipped play area. The school playing field offers some play opportunities for this western part of Mosstodloch but does not contain play equipment.

MOSSTODLOCH WALKING CATCHMENTS TO REASONABLE, GOOD AND HIGH-QUALITY PLACE VALUE SPACES
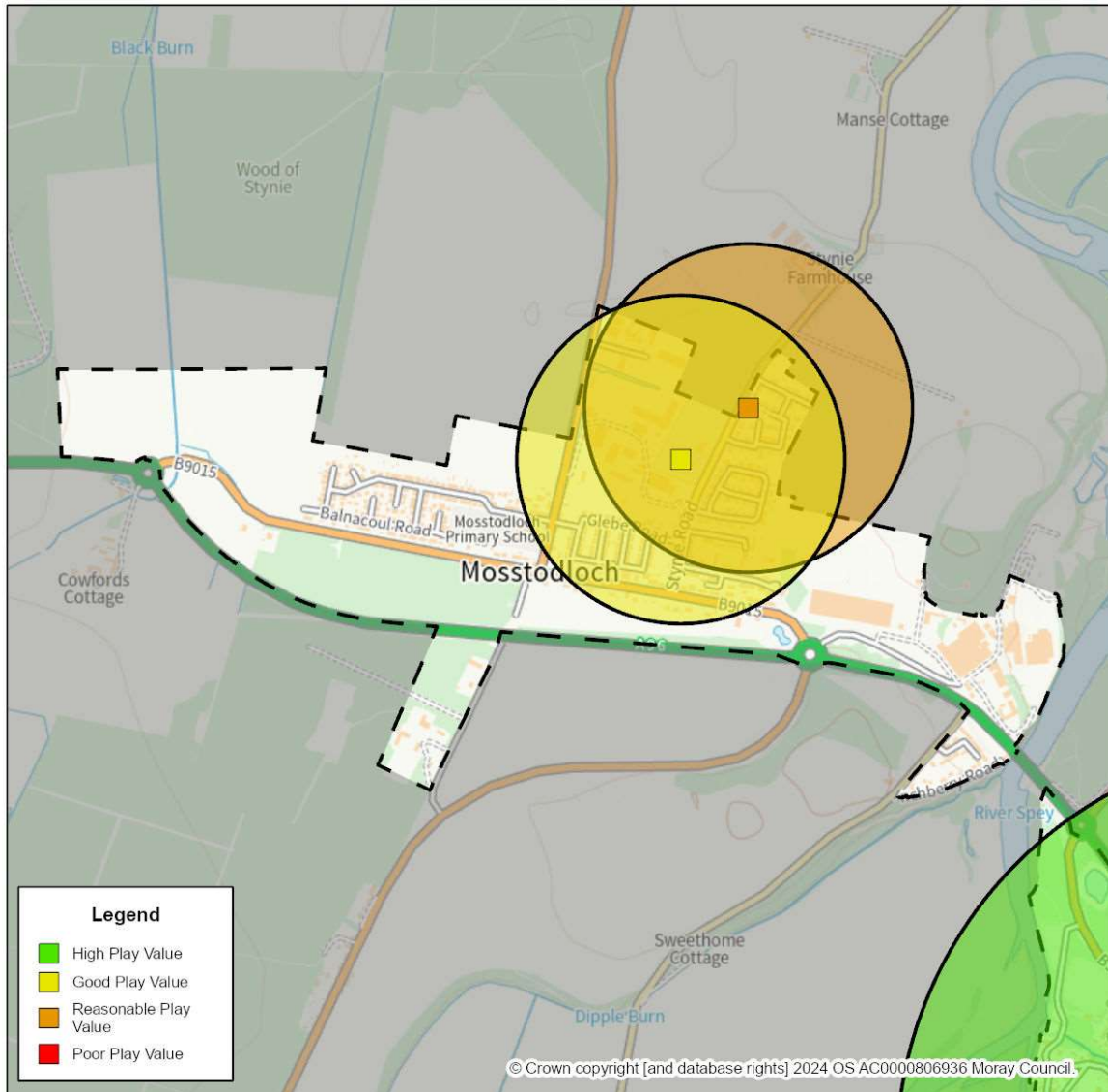
Mosstodloch Informal Play Opportunities

In Mosstodloch informal play opportunities are largely made up of natural spaces that are designated ENV within the LDP.

MOSSTODLOCH INFORMAL PLAY OPPORTUNITES

Balnacoul Wood includes informal play opportunities with potential for tree climbing/swinging, den building, connecting to nature and sign posted walks and mountain biking. At the entrance to the woods there is a picnic site with benches and seating providing opportunities to meet up and socialise. To the rear of Pinewood Road, the core path goes through space with trees, hedges and gorse. This route connects through to Stynie Woods to the north of Mosstodloch. To the east of Mosstodloch the trees and green space beside the Scout Hall also provide opportunities for informal play. Smaller amenity green spaces for example at Spey Walk and Mossmill Park provide some limited space to run around or play games. Playing fields at Mosstodloch Primary School and Speymouth Hall provide opportunities for informal kickabouts or other sports when not in use by schools/clubs.

Engagement and Consultation Summary

Children

Online survey was sent to all primary schools in Moray with a request for this to be circulated to pupils to complete. This survey included a mapping function allowing children to drop a "pin" where they played. A total of 84 children responded to the survey. Two of these were for spaces out with Moray (Nairn splash park and Aden Country Park) and were removed from the analysis but perhaps highlight a gap in provision within Moray.

The age range of respondents was between 2 year and 14 years old who commented on 52 formal equipped play spaces and 30 informal spaces. The informal spaces identified were mainly woods and beaches with some children identifying rivers/burns/ponds and green spaces.

Children rated the majority of spaces highly scoring most spaces five. No informal spaces scored below three and only five formal spaces scored below 3.
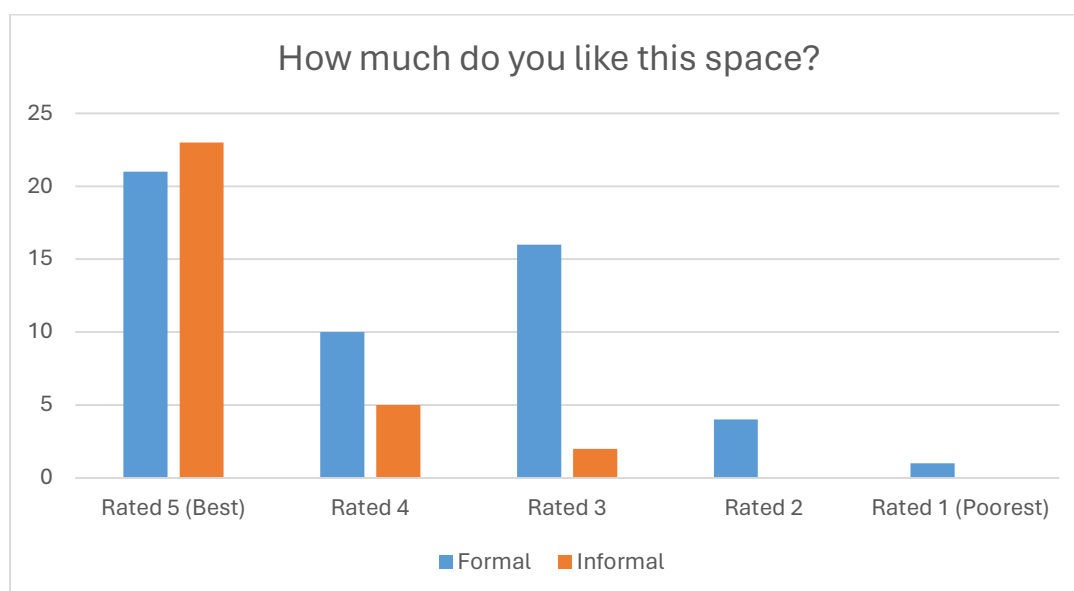
Children talked positively about building dens in the woods, climbing trees, cycling down hills, scootering, meeting friends, playing football, and watching nature. Several children mentioned swimming in harbours, lochs and in the sea. They also mentioned they liked spaces as they were close to where they live.

"I like the beach because I can play with the sand and dipping my toes in the water and running down the sand dunes".

"I love looking at nature here but would also love if there was a park in the middle too."

"We like it cos we can build dens and find treasure down the burn".

"There are no swings or other play items for my age group it's all for babies and toddlers."

41

Some children noted that they don't always feel safe with broken glass, and older children picking on them. One respondent noted the lack of facilities for basketball noting they used a rundown court that was overgrown. One respondent said they travelled to Craigellachie to play as the play parks in Archiestown and Aberlour don't have enough play equipment.

Do you feel safe while you are there from cars/lorries or bullies?

■ Yes ■ No
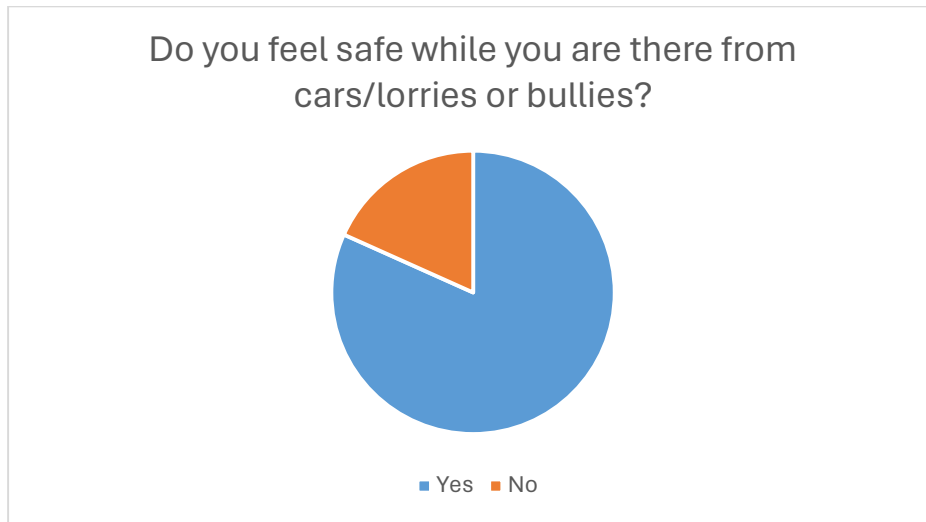
Suggestions for improvements included more play parks, more varied equipment, skate park/learner ramps, logs to climb on, splash pad, community garden, sand pit, marking out pitches, sheltered seating, and a smooth area for scooting/skating.

In addition to the Moray wide survey more focused work was completed with a group of P5-7 pupils from Seafield Primary School in Elgin and parents and children at New Elgin Primary School. This included mapping green and play spaces. This helped to identify where children play and their perceptions of the play spaces. This helped to gain an understanding of where children played out with equipped play areas including woodlands, river/burn corridors, and grassed open spaces. The mapping helped to provide an indication of the distance children were walking, often independently, to access both formal and informal play spaces. Children were also asked to consider what they liked about play spaces and write/draw this on a top, they also considered what they found poor or disliked and wrote this on pants. The key issues raised include the lack of provision for different ages of children across play spaces, existing equipment needing to be replaced, the lack of natural/imaginative play opportunities, limited opportunities for exciting or challenging play, poor accessibility for wheelchair users and lack of equipment for those with disabilities. The lack of nature within wider greenspaces was also highlighted with suggestions for more tree planting and wildflower areas.

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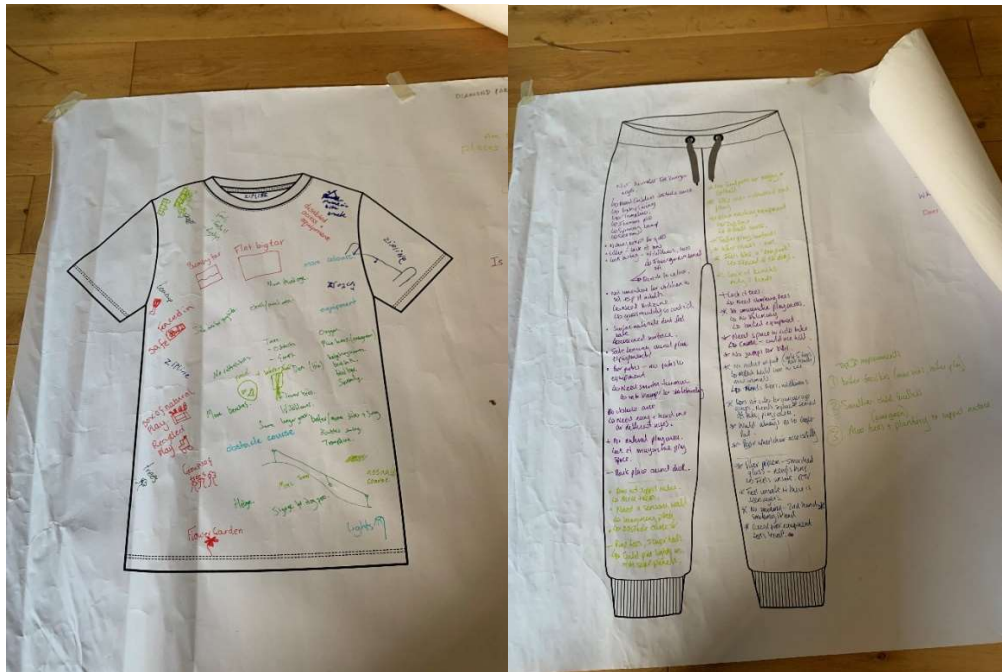
Young People

Over 400 pupils at Elgin Academy completed a Place Survey and told us where they hung out and played. A significant portion of young people highlighted parks, playing fields, and woods in their responses with specific places mentioned including Cooper Park, the Oakwoods and Morriston playing fields. A lot of young people also noted they went to the astro turf, skate park and golf course. Hanging out in town was also a common answer. A smaller portion of young people noted that they visited green spaces and school playgrounds. A portion of the young people said there was nowhere to hang out or play and some specifically noting they live rurally without places to hangout.

Young people were also asked what they liked about the places they hung out or played. Whilst "nothing" was a common response others young people referenced "the fun things to do", walking and mountain bike trails, being able to play sport (football and cricket), and the nature. A significant number of responses noted they liked the amount of space there was and the peacefulness of spaces for example one respondent noted "space to walk away from traffic and people" and "empty just me and my friends". Somewhere to meet friends was highlighted in a number of responses with places to sit and hangout mentioned. The proximity to where young people lived and that spaces were free were noted by a number of young people. Interestingly swings were highlighted in a significant number of responses as something young people liked about spaces. One respondent noted that they like the space because "nobody can see us mucking about".

Common themes when asked what could be done to make the spaces better were:
- Updated/better range of play equipment.
- More for older children and young people as they felt play spaces focused on younger children.
- Adding more trees and landscaping to spaces
- Tidying up spaces -removing broken glass, rubbish and dog foul

Many respondents said, "add more thing to do" and some specific suggestions included more swings, trampolines, outdoor gym equipment, provision of football goals, pump track, basketball

43

courts, better athletic facilities, toilets and better trails (walking and mountain bike). More spaces to sit and sheltered seating was suggested.

Can you walk to places with your friends that you feel safe to hang out and talk?
■ Yes ■ No

Do you walk or cycle to the places where you hangout?
■ Yes ■ No

Is there a problem with vandlism where you hang out?
■ Yes ■ No

Do you have good access to nature where you live (i.e. woods, wetlands etc)
■ Yes ■ No
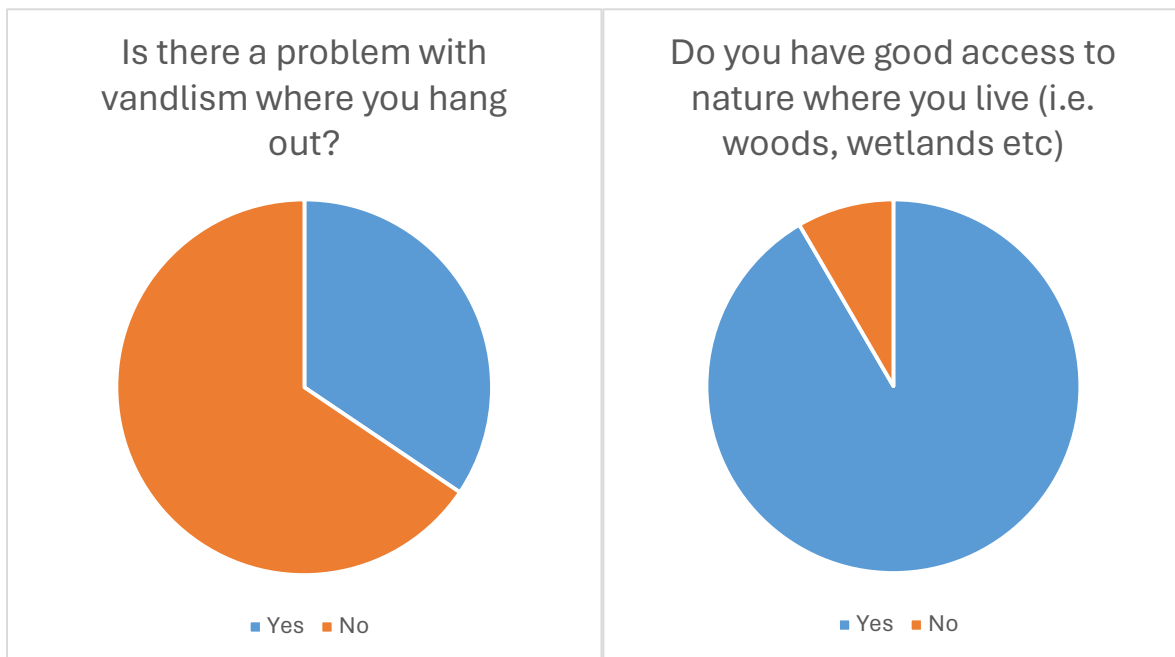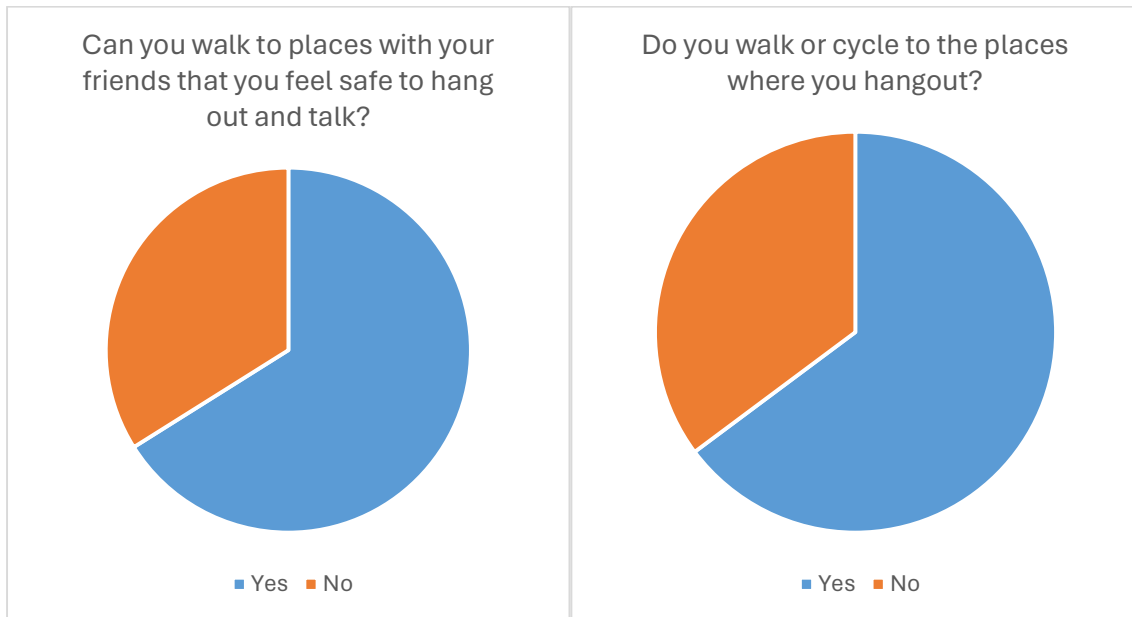
Parents and Carers, Community Councils, and other Groups

An online survey was published in March 2024 to inform the PSA. This was promoted on the Council's social media and also emailed directly to Community Councils, groups working with children and ASN community/interest groups. A total of 325 response were received (although not all questions were answered by all respondees). The majority of these, 288, were from parents, grandparents, guardians and carers. Seven of the 17 Community Council's emailed provided a response.

44

Responses Received

Category	Value
Other (please specify)	
Member of the public	
I represent a Community Council	
I represent a Community/interest group	
I am a child/young person	
I am a Grandparent	
I am a parent/Guardian or Carer	
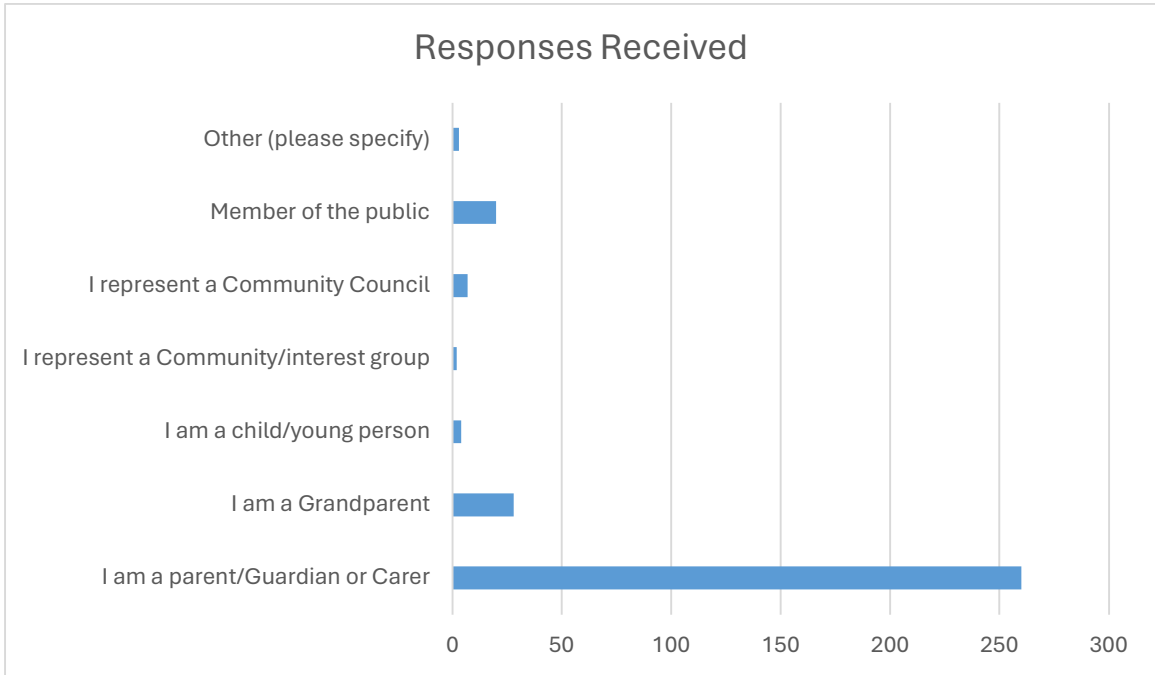
Responses were received from across Moray but over 100 of these were from Elgin.

Series 1
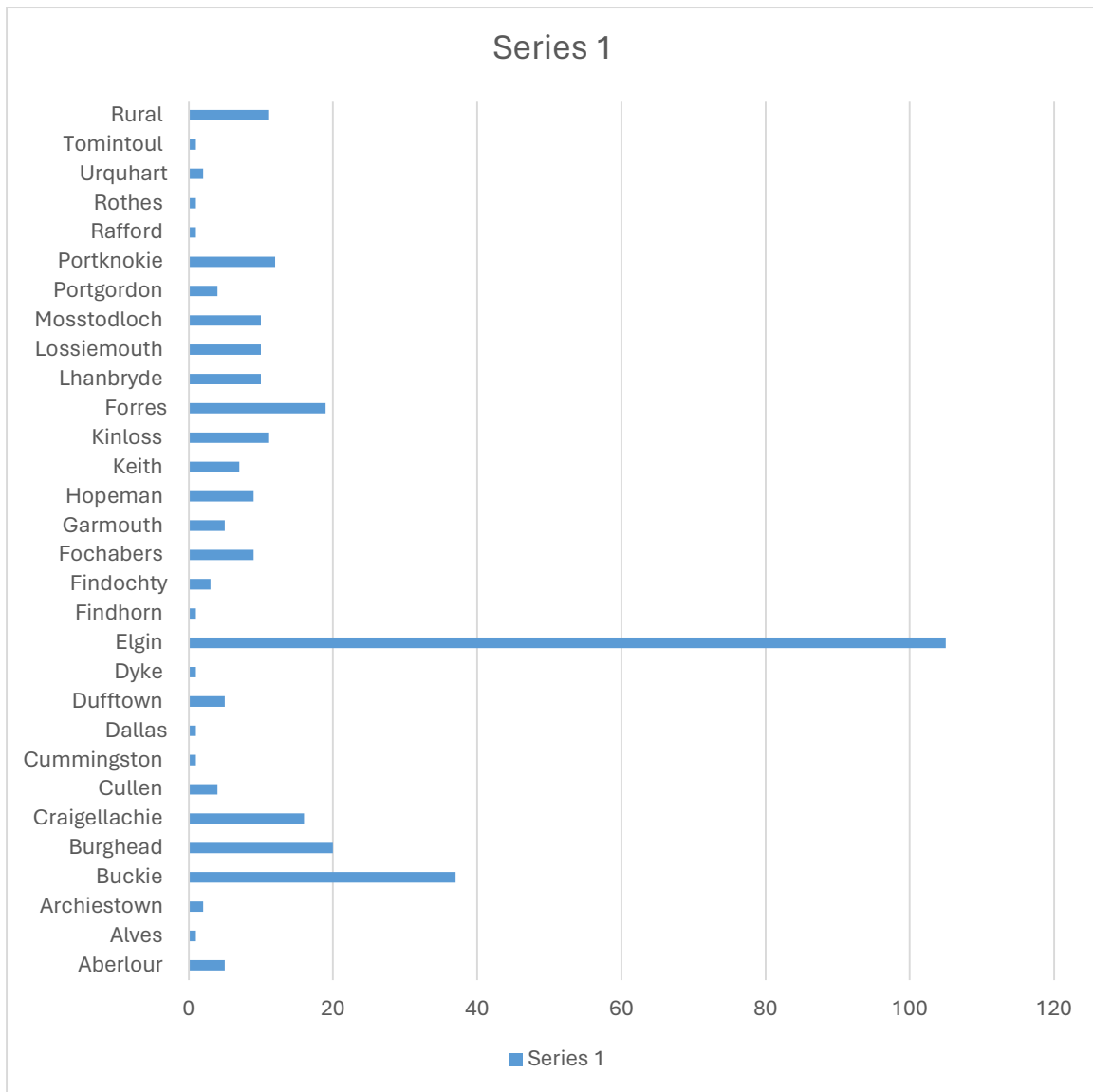
The survey found that 91% of those respondents considered local play provision to be very important to the overall development and wellbeing of children – rating this 5 very important on a scale of 1 to 5. No respondents considered this to be "not important" with the remaining responses scoring 3 or 4 on the scale of importance.

The survey asked if there were enough spaces for children and young people to hangout. The response found 42% considered there to some good places to hangout/play and 39% stated that places to hangout/play were poor. This suggest that the quality of spaces is an issue rather than the quantity.

In the other category comments included that there were only grass areas, nothing for older children/young people, spaces were unsafe, nothing for disabled children and that parks were run down (vandalism, glass, broken and removed equipment).

Are there enough spaces for children and young people to play and hangout in your area?
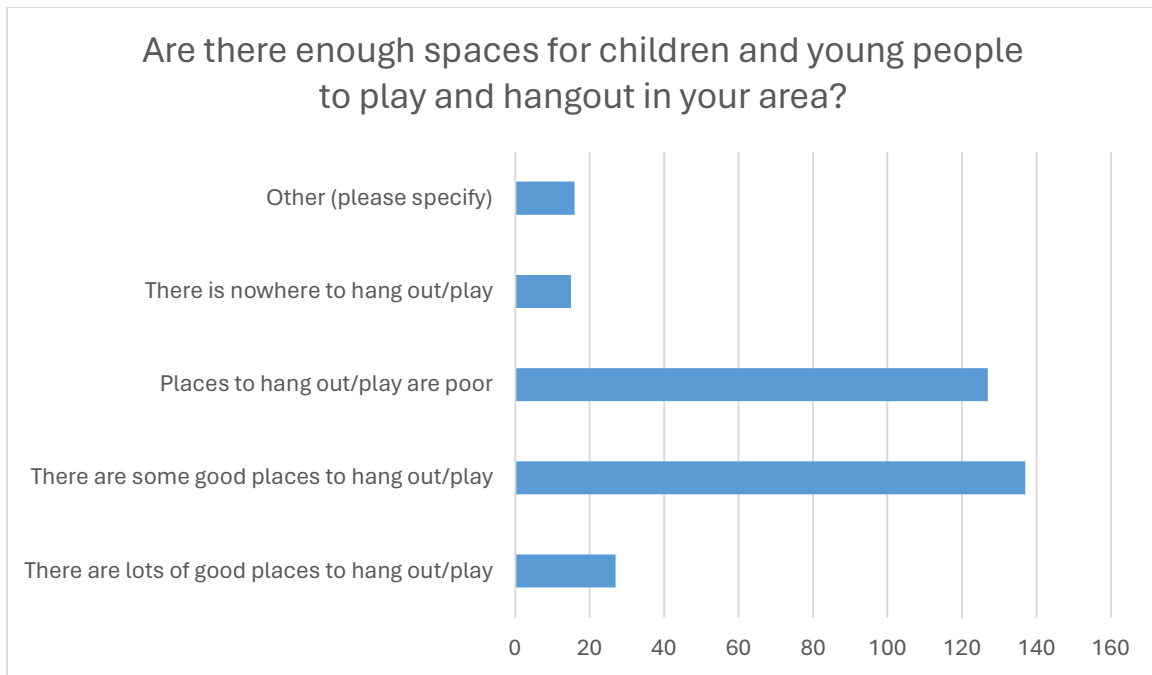
Playparks, woods, and playing fields were identified as place children and young people play/hangout. This correlates with what children and young people told us through other engagement. Other places identified in the survey include cemeteries, harbours, school grounds, and on the street.

Where do children and young people usually play or hang out in your area?

When ask to consider the good things about outdoor play spaces near them the most common response was that these were easy to get to, safe from traffic, the natural features and that there was space for football and other sports.

47

What are the good things about outdoor play spaces near you?

Category	Value
It feels safe	~65
There are toilets nearby	~43
It has provision for skateboarding/scooters	~40
It provides space for football or other sports	~150
It is easy to get to	~173
It has a good mix of play equipment	~62
It is tidy and well maintained	~64
It is safe from traffic	~165
There are natural features like trees, logs, or...	~152

The things people most disliked about play spaces were the untidiness, old or broken equipment, the limited things to do and the lack of inclusive, wheelchair accessible or sensory play. The lack of nearby toilets or seasonal opening of toilets was specified in a number of responses. The lack of enclosed fenced spaces and the quality of surfaces was also specified by several responses.

What are the things you don't like about the outdoor play spaces near you

Category	Value
Other (please specify)	~48
There is nothing I don't like	~5
Too far away	~20
There are busy roads close by	~68
Not enough seating	~108
It isn't easy to get to	~13
There is no skate park	~90
There is no space for football or other sports	~17
It feels unsafe	~78
The play equipment is old or broken	~172
There isn't enough to do	~155
No inclusive, wheelchair accessible or sensory play...	~155
Play equipment is for older children only	~47
Play equipment is for younger children only	~93
It is untidy (e.g. dog fouling, broken glass, rubbish)	~190
There are no natural features	~72

48

Responses highlighted that 12-15 and 16-17 years old had limited access to suitable play/hangout spaces. However, a significant portion of responses found this to be the case for 0–4-year-old and 5–11-year-olds.

Are there any particular age groups that you feel have limited access to suitable play/hang out spaces in your area?

Legend: ■ 0-4 years old ■ 5 -11 years old ■ 12-15 years old ■ 16-17 years old
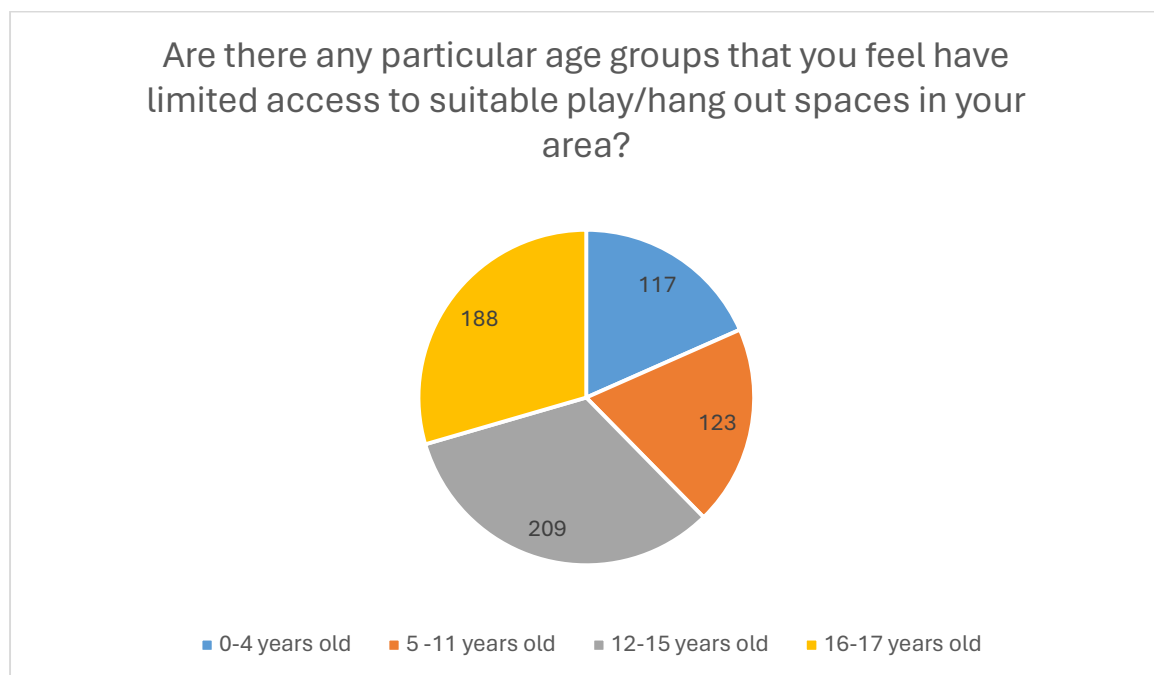
A wide range of suggestions were submitted to the question about how children with additional needs could be supported in the design of play spaces. Suggestions included secure parks with fencing, more natural and sensory play (including sand, water, sensory gardens and musical play), large supportive seats for swings, floor level roundabout with seats, larger play equipment to support older children (or to fit parent), wheelchair accessible equipment, accessible play equipment so not all slides are accessible by ladder or net, the ability to play together with able siblings/friends, ensure that surfaces to equipment (particularly inclusive equipment) are good including path surfaces, kerbs and gates, signage (Makaton, disability visible/invisible awareness) and shelter. Toilet access and changing facilities were identified as being important.

The main barriers to play identified were access to toilet/changing facilities, no/limited inclusive play equipment and no/limited wheelchair accessible play. Challenging surfaces and the location of play spaces too far away to be accessed by children independently was also identified as barriers to play. Under "other" antisocial behaviour and bullying by young people was identified as a barrier to play. Busy roads and need for cycleways were identified as a barrier as was ground conditions (waterlogged). One respondent noted that "a culture that doesn't like to see older children hanging out or playing" was a barrier.

49

Are there any specific barriers or challenges that prevent children and young people from accessing play spaces in your area?

Barrier	Value (approx.)
Other (please specify)	42
Access to toilet/changing facilities	157
Space is dominated by girls (no space for boys)	2
Space is dominated by boys (no space for girls)	18
Play areas are too far away for children to go...	89
Challenging and uneven surfaces (e.g. bark, grass)	99
Inaccessible paths and routes	51
No or limited wheelchair accessible paly...	115
No or limited inclusive play equipment	123

The most common response to what changes or improvements would you suggest to enhance play provision was replacing/updating play equipment and providing a greater range of equipment. Other suggestions and themes are set out below.

- Natural play including within woodlands and play trails along woodland/coastal routes.
- Imaginative and sensory play (including water, sand and music).
- More for older children/young people – bike track, skate park, basketball court, benches for young people, goal posts and parkour.
- Dedicated play areas for babies/toddlers.
- Wheelchair accessible and inclusive play provision to support children with ASN.
- Playparks catering for wider range of age groups and needs.
- All weather MUGA/5 a side.
- Provision of larger play parks in new developments
- Undercover play areas (shelter and shading).
- More seating and picnic areas.
- Lighting and CCTV
- Providing different play experiences across a town so that could experience different things - i.e. not having all play spaces the same.
- Outdoor gym equipment

50

APPENDIX 2

Play Area Summary Table

Site Details				Play Space Information				Play Space Condition				PSA Quality Assessment							Comments
Site Details	Site Name	Town	Ownership/ Management	Play Area Typology	Age Range	Key qualities and features	Level of Use	Condition description	Accessibility	Playability Score 2022	Condition Score 2023	Location	Design	Physical Play	Creative Play	Social Play	Overall Score	PSA Play Quality Value	
M/PS/AB/23/001	Taylour Court/Sellar Place	Aberlour	Moray Council	LAP	0-11	Small park in heavily landscaped sloping area to rear of housing.	Low	Older equipment with signs of wear and fading.	Playpark is on sloping grass.	92	Fair	6	3	4	0	2	15	Poor Play Value	Potential for more natural play to be incoparated making use of the slopes.
M/PS/AB/23/002	Allardyce Terrace	Aberlour	Moray Council	LEAP	0-11	Small equipped playpark close to housing. Set back from housing and below road.	Medium	Good condition.	Playpark surfacing is bark with raised permiter with no paths into play area. Slope to housing.	92	Fair	7	4	5	0	2	18	Reasonable Play Value	Potential to improve surfaces and accessiblity.
M/PS/AB/23/003	Alice Littler Park	Aberlour	Moray Council	Destination	0-11	Equipped play area set within wider Alice Littler Park close to the centre of Aberlour and attractive landscaped setting of the River Spey. The park has open green space, a good path network and benches/picnic areas. The park benefits of having parking and toilets nearby.	High	Older equipment with worn and tired appearance.	Playpark surfacing is bark in places with raised permiter. Paths are generally whin style with steps on some routes.	118	Fair	7	7	7	3	2	26	Good Play Value	Potential to improve surface and accessiblity. Potential to incorporate more inclusive and senosry play.
M/PS/AL/23/001	Alves Primary School	Alves	Moray Council	LEAP	0-11	School play ground with play equipment located at end of playingfields.	High	Older equipment with signs of wear and fading.	Generally flat and links to wider school playground. Play equipment is located in bark pits at end of grass of playing fields.		Fair	7	8	5	0	2	22	Good Play Value	Opportunity to incorporate natural and creative play.
M/PS/AR/23/001	The Playing Field	Archiestown	Other	LEAP	0-11	Small village space adjacent to playing field and pavilion. Limited overlooking.	Medium	Limited play equipment that is dated. Surfaces deteriorating and some equipment removed.	Playpark located close to entrance to playingfield but accessed via uneven grass with no paths. Matting around play equipment which is deteriorating.	117	Poor	7	5	5	0	2	19	Reasonable Play Value	Updated and greater age range of play equipment. Surfaced paths to play equipment.
M/PS/BG/23/001	Burghead Recreation Ground - St Aethans	Burghead	Moray Council	LEAP	0-17	Playpark to rear of bowling club in wider recreational space with football pitch.	Medium	Reasonable conditon but with worn and tired appearance.	Playpark surfacing is bark with raised permiter with no paths into play area. No surfaced paths to play area and steps up from adjacent housing.	134	Fair	7	6	7	0	2	22	Good Play Value	Potential to improve surfaces and accessiblity.
M/PS/BG/23/002	Sigurd Street	Burghead	Private	LAP	0-4	Small playpark within a larger neighbourhood open space with good views to coast.	Low	Play equipment in reasonable conditon but set within unmaintained and long grass that was overgrown at time of visit.	No paths to play equipment. Grass overgrown to extent this restricts access.			4	5	3	0	2	14	Poor Play Value	Maintenace of wider greenspace.
M/PS/BG/23/003	Burghead Primary School	Burghead	Moray Council	LEAP	5-11	Play equipment within school grounds.	High	Limited equipment but reasonable condition for age.	Central location. With good paths and surfaces.		Fair	6	7	3	1	2	19	Reasonable Play Value	
M/PS/BK/23/001	Letterfourie Road/Netherha	Buckie	Moray Council	LEAP	5-11	Play area enclosed by rear of housing. Attractive mature trees with paths through space. Range of play equipment for vareity of ages.	Medium	Older equipment with signficant signs of wear and fading.	Play equipment set in bark surfacing with raised permiter.	130	Poor	7	7	7	0	1	22	Good Play Value	Play park renewal programmed.
M/PS/BK/23/002	Barhill Road West	Buckie	Private	LEAP	5-11	Play space for younger age group in central open space well overlooked by housing.	Medium	Equipment condition good.	Play equipment set in bark surfacing with raised permiter. No surfaced paths acrross grass to play area.			5	4	4	0	1	14	Poor Play Value	
M/PS/BK/23/003	Smirack Road	Buckie	Private	LEAP	0-11	Well overlooked fenced central space within housing development. Limited range of equipment.	Medium	Equipment in reasonable condition.	Play equipment set in bark surfcacing with raised perimeter. Whin style paths to play area.			6	8	7	0	2	23	Good Play Value	
M/PS/BK/23/004	Linzee Gordon Park Buckie	Buckie	Moray Council	NEAP	0-15	Playpark set within wider park with pavilion and football/cricket pitches. Play area located close to entrance with small amount of parking.	High	Equipment in good condition with some signs of fading and wear.	Play equipment set in grass.	133	Good	6	7	7	0	2	22	Good Play Value	

Ref	Name	Town	Ownership	Type	Age	Description	Rating	Equipment Condition	Access Notes	No.	Condition	S1	S2	S3	S4	S5	Total	Play Value	Comments
M/PS/BK/23/005	Maud View McWilliam Crescent Play Park	Buckie	Private	LAP	0-4	Small play area suitable for younger children set within green space between housing.	Low	Equipment in reasonable condition.	Equipment has mat surface around but paths don't lead to this requiring access to be taken short distance over grass. Flat area.			6	6	3	1	2	18	Reasonable Play Value	
M/PS/BK/23/006	Ian Johnston Park Buckie	Buckie	Moray Council	NEAP	5-15	Well equipped park for variety of ages with kick about space. Located centrally close to school. Well used skate park. Tennis courts appear unused.	High	Equipment in reasonable condition with some signs of graffiti/vandalism.	Climbing structure set in bark with rest of equipment in grass without surfaced paths to equipment.	133	Good	8	8	8	2	2	28	High Play Value	Potential to improve surfaces and accessiblity.
M/PS/BK/23/007	Well Road Buckie	Buckie	Moray Council	LEAP	5-15	Bright and colourful play park with fun range of equipment.	Medium	Space is not well overlooked and there are signs of vandalism/anti social behaviour. Equipment generally in good condition with reparis required to slide.	Set in grass with no paths.	135	Good	6	7	7	0	2	22	Good Play Value	Replacement slide to be provide as part of play park renewal programme.
M/PS/BK/23/008	Buckpool Harbour	Buckie	Moray Council	LEAP	0-11	Attractive open space with strong coastal character. Includes a range of equipment set within shaped landform that provides some shelter. Flat kickabout space.	Medium	Equipment in good condition.	Some equipment set within bark with the rest level grass mat. No paths to play equipment. Landform could be barrier to access for mobility impaired.	136	Good	7	5	8	2	2	24	Good Play Value	
M/PS/BK/23/009	Merson Park	Buckie	Moray Council	LEAP	0-11	Merson park has strong focus for sport, particularly football. Linear playpark alongside playing fields. Range of equipment suitable for toddler with more challenging climbing for older children.	Medium	Some equipment removed at time of site visit.	Acess to play area is across grass.	134	Fair	4	5	5	0	1	15	Poor Play Value	No bench provision.
M/PS/BK/23/010	The Meadows	Buckie	Private	LAP	0-11	Small enclosed play area in housing development with limited equipment. Primarily for younge ages.	Medium	Equipment in reasonable conditon. Fencing in poorer condition.	No surfaced paths to play area. Equipment set within bark with raised permiter.			5	4	5	0	2	16	Poor Play Value	
M/PS/BK/23/012	Cluny Primary School	Buckie	Moray Council	LEAP	5-11	School play ground. Some natural equipment for balance/agility and basketball hoops.	High	Equipment showing signs of age and wear.	Some play equipment set within grass.		Poor	5	7	6	2	2	22	Good Play Value	
M/PS/BK/23/013	Portessie Playing Field	Buckie	Moray Council	LEAP	0-11	Play area part of wider playing field with play equipment located to rear of primary school.	High	Equipment in reasonable condition with some signs of fading and wear.	Play equipment set within bark with raised perimeter. No paths to play equipment.	134	Fair	7	8	8	0	2	25	Good Play Value	
M/PS/BK/23/016	Orchard Road/Seafield Circle	Buckie	Private	LEAP	0-4	Well overlooked toddler play park within small open space in housing development. Landscaping limited to some grass and trees.	Medium	Equipment in good new condition.	Surfaced path to playpark entrance only.			6	6	3	0	1	16	Poor Play Value	
M/PS/CC/23/001	Clochan Hall	Clochan	Other	LEAP	0-11	Play equipment within grounds of rural village hall.	Medium	Equipment in good condition.	No paths to playpark.	109	Good	5	7	6	0	1	19	Reasonable Play Value	
M/PS/CD/23/001	Cardhu Distillery Play Area	Cardhu	Other	LEAP	0-11	Well overlooked playing field with play equipment limited to a swing set.	Low	Paint peeling in places.	No paths to play equipment.	76	Fair	7	4	3	0	1	15	Poor Play Value	
M/PS/CL/23/001	Playing fields Logie Drive	Cullen	Moray Council	NEAP	0-11	Large playingfield with pavilion close to housing and caravan park. Play area located on edge of site with fencing to the road edge.	High	Play equipment in good condition.	No surfaced paths to play equipment. Equipment set within bark with raised perimeter.	135	Good	7	6	7	0	2	22	Good Play Value	Potential to improve surfaces and accessiblity.

Ref	Name	Location	Owner	Type	Age	Description	Usage	Condition	Access	No.	Quality	S1	S2	S3	S4	S5	Total	Play Value	Comments
M/PS/CL/23/003	Cullen Primary School	Cullen	Moray Council	LEAP	5-11	Playpark area within school grounds. School ground tarmac and grass.	Medium	Play equipment in reasonable condition.	Paths to equipment.		Fair	7	8	5	0	2	22	Good Play Value	
M/PS/CM/23/001	Seaview Road Play Area	Cummingston	Moray Council	LEAP	0-11	Playpark close to coastal path with slide utiltising coastal slope. Parking and toilets close by.	Medium	Play equipment in good condition.	Play equipment within hard standing area with matting around play equipment. No surfaced path to hardstanding.	138	Good	6	7	8	2	2	25	Good Play Value	Portenial to improve access to hardstanding area.
M/PS/CR/23/001	Tennis Courts Craigellachie	Craigellachie	Other	LEAP	0-11	Play area on Speyside Way and adjacent to tennis pavilion. Good range of equipment	Medium	Play equipment in mixed conditon with some paint peeling.	Play equipment set within bark with raised perimeter. No paths to play equipment.	125	Good	6	8	5	0	2	21	Reasonable Play Value	Potential to improve surfaces and accessiblity.
M/PS/CR/23/002	Brickfield Craigellachie	Craigellachie	Moray Council	LEAP	0-11	Playpark tucked away to rear of housing with access restricted to narrow paths between housing. Play area fenced.	Medium	Play equipment in good condition.	Play equipment set within grass.	131	Good	6	7	5	0	2	20	Reasonable Play Value	Potential to improve surfaces and accessiblity. Potential for more planting/landscaping.
M/PS/DA/23/001	Houldsworth Institute	Dallas	Other	LEAP	0-11	Play area within grounds of Dallas Institute. Set within attractive surroundings with good range of play equipment.	Medium	Play equipment in reasonable condition.	Play equipment set within grass areas with matting around equipment.	119	Fair	7	7	7	2	2	25	Good Play Value	
M/PS/DF/23/001	Hill Street/Mortlach Playing Field	Dufftown	Moray Council	NEAP	0-11	Playarea to side of wider playing field that is also used for local events. Play area on a slope.	High	Play equipment in reasonable condition	Sloping site. Play equipment with grass matting. Paths do not provide access to play equipment.	132	Fair	7	6	7	1	1	22	Good Play Value	Potential to improve surfaces and accessiblity.
M/PS/DF/23/003	Tinniver Playing Field	Dufftown	Moray Council	LEAP	0-15	Recently upgraded play park with wide range of equipment for range of ages and abilities. Set within wider open space with pitch and bowling club adjacent.	High	Play equipment in good condtion.	Toddler park has colourful matting. No paths to play equipment which are set within grass with some areas sloping.	153	Good	7	7	8	1	2	25	Good Play Value	Potential to improve surfaces and accessiblity to some equipment.
M/PS/DK/23/001	Dyke Primary School	Dyke	Moray Council	LEAP	0-11	Expansive playing field with climbing frame, swings and climbing/rope course.	Medium	Generally reasonable condition with climbing frame appearing more worn.	Access is over grass with grass slope down to equipment.		Fair	7	9	7	2	2	27	High Play Value	
M/PS/DM/23/001	Drummuir Playing Field	Drummuir	Moray Council	LEAP	0-11	Play area with good range of equipment to rear of rural village hall adjacent to playing field.	Low	Play equipment in reasonable condtion.	No paths to equipment. At time of site visit grass was long and overgrown restricting access for mobility impaired.	129	Fair	7	6	5	0	1	19	Reasonable Play Value	Potential to improve access and entrances to park.
M/PS/DU/23/001	Recreational Ground Play area Duffus	Duffus	Moray Council	LEAP	0-17	Small park with brightly coloured equipment in corner of wider playing/recreational ground. Close to village and on path to village hall.	Medium	Play equipment in good condtion.	Play equipment set within bark with raised perimeter. Access to play over grass areas with no direct paths.	128	Good	5	8	5	0	2	20	Reasonable Play Value	Potential to improve surfaces and accessiblity. . Opportuntiy for natural play.
M/PS/EL/23/001	Bremner Drive Play Area	Elgin	Other	LEAP	0-11	Small fenced play area with range of brightly coloured equipment. Set within neighbourhood with good surrounding path links.	Medium	Play equipment in mixed condition with some older equipment looking worn and faded.	Accessed by good path network with play space a level surface.			5	6	6	0	2	19	Reasonable Play Value	Some double of equipment so when replaced greater variety could be introduced.

ID	Name	Town	Owner	Type	Age	Description	Value	Condition	Access	No.	Qual	S1	S2	S3	S4	S5	Total	Rating	Opportunity
M/PS/EL/23/002	Cooper Park	Elgin	Moray Council	Destination	0-17	Cooper Park is the key central space and focus of recreation for Elgin with a strong history having been gifted to the town. Play park provides a reasonable range of play equipment for a variety of ages. The park includes facilities such a a skate park, toilets, library, tennis courts and bowling club. Parts of the park, for example the former pitch and put, provide for more creative play.	High	Play equipment in reasonable conditon but some aged and worn. As a key destination for families including tourists the range and quality of play equipment could better reflect this. Lack of inclusive play equipment.	Play park accessed via good path network. Toddler play area is bark with high raised step to access this. Other play equipmetn is also set within bark with raised perimter restricting access.	146	Fair	7	8	9	2	2	28	High Play Value	Opportunity to create a destination that reflects the importance of the space and caters for a greater range of abilities.
M/PS/EL/23/003	Glassgreen Playspace	Elgin	Private	LEAP	0-15	Play area on edge of housing estate relatively flat but close to busy road.	Medium	Play equipment in reasonable conditon with signs of ageing and wear.	Set within bark with raised perimeter. Path netowrk does not connect directly to play space.			5	6	7	0	2	20	Reasonable Play Value	Opportunity to improve perception of saftety by fencing space. More landscaping to wider open space.
M/PS/EL/23/004	Bisset Beat/Balvenie Park	Elgin	Private	LEAP	0-11	Small play park in central green space within housing development. Play equipment for younger children.	Medium	Play equipment in good condition.	Set within bark with raised perimeter. Path netowrk does not connect to play space.			6	7	7	0	1	21	Reasonable Play Value	
M/PS/EL/23/005	McBeath Avenue	Elgin	Private	LEAP	0-11	Play park within housing development. Well overlooked and largely for younger children.	Medium	Play equipment in good condition with signs of wear and fading.	Set within bark with raised perimeter. Path netowork connects to edge of bark.			7	6	6	0	2	21	Reasonable Play Value	
M/PS/EL/23/006	Nelson Square	Elgin	Other	LEAP	0-11	Small neighbourhood park in square surrounded by houses. Managed by Minstry of Defence. Good range of equipment offering variety of play experiences with some space for imaginative play.	Medium	Play equipment and surfaces in very good condition.	Quiet surrounding streets with dropped kerbs. Good level surfaces throughout.			8	7	7	1	2	25	Good Play Value	
M/PS/EL/23/007	Esmonde Gardens	Elgin	Other	LEAP	0-11	Small neighbourhood park with planting surrounding. Poorly maintained with play equipment fenced off on site visit and signs of vandalism. Managed by Minstry of Defence.	Low	Very poor. Equipment broken and fenced off. Broken glass and litter.	Playpark on a slope. Some entrances have steps but alternative barrier free access available.			5	5	4	0	0	14	Poor Play Value	
M/PS/EL/23/008	Ferrier Terrace	Elgin	Moray Council	LEAP	0-11	Small play park well overlooked by housing. Small range of equipment with larger climbing structure for older children.	Medium	Reasonable condition but signs of wear and equipment has been removed.	Set within bark with raised perimeter. Path netowrk does not connect to play space with area around play park steeply sloping grass. .	129	Fair	4	5	6	0	1	16	Poor Play Value	Potential to improve surfaces and accessiblity.
M/PS/EL/23/009	Spynie Brae Play Area	Elgin	Other	LEAP	0-17	Very attrractive play area with bright coloured surfaces. Includes sensory panels with games and outdoor gym. Managed by Ministry of Defence.	Medium	Very good condition.	Good paths and surface.			8	9	7	1	2	27	High Play Value	
M/PS/EL/23/011	Myreside Circle	Elgin	Other	LEAP	0-11	Play area in green space to rear of housing. Very attractive with bright colours and a good range of varying equipment catering for a good age range. Bright coloured wet pour.	Medium	Very good condition.	Good paths and surface.			8	9	7	1	2	27	High Play Value	

Ref	Name	Town	Owner	Type	Age	Description	Value	Condition	Access	No.	Rating						Total	Play Value	Comments
M/PS/EL/23/012	McIntosh Drive	Elgin	Moray Council	LAP	0-11	Small play area that sits within a grassed amenity area close to woodland edge. Very limited range of play equipment.	Low	Reasonable condition but signs of wear and aged appearance.	Access over grass.	109	Good	7	3	4	0	1	15	Poor Play Value	Consider function of space and its relationship to nearby M/PS/EL/23/013 Ardgilzean Place/Brumley Brae.
M/PS/EL/23/013	Ardgilzean Place/Brumley Brae	Elgin	Moray Council	LAP	0-4	Small park set in green space to rear of housing. Limited range of equipment.	Low	Reasonable condition but signs of wear and aged appearance.	Access over grass.	93	Good	3	3	4	0	1	11	Poor Play Value	Consider function of space and its relationship to nearby M/PS/EL/23/012 McIntosh Drive.
M/PS/EL/23/014	Mayne/Bilbohall Park	Elgin	Moray Council	LEAP	0-11	Large open space with play area and kickabout area. Set apart from and across road from housing development.	Medium	Good condition with signs of ageing and wear.	Some equipment set within bark with the rest level grass mat. No paths to play equipment.	130	Good	7	7	7	0	2	23	Good Play Value	
M/PS/EL/23/015	Greenwards Playspace	Elgin	Moray Council	LEAP	0-11	Play area close to but not within Greenwards Primary School with good range of equipment.	High	Good condition with signs of ageing and wear.	Some equipment set within bark with the rest level grass mat. No paths to play equipment.	128	Fair	8	6	7	1	1	23	Good Play Value	
M/PS/EL/23/016	South Lesmurdie	Elgin	Moray Council	LEAP	0-11	Small play park set in sloping open green space close to dense housing development but distant from roads/traffic.	Medium	Reasonable condition but signs of wear and aged appearance.	Playpark surfacing is bark with raised permiter with no paths into play area. Slope to housing.	128	Fair	3	4	7	0	1	15	Poor Play Value	Potential to improve surfaces and accessibility.
M/PS/EL/23/017	Kingsmill Playspace	Elgin	Moray Council	LAP	0-4	Small play park suitable for young children set in fenced green space between Newmill Road and housing so well overlooked.	Low	Equipment in good condition.	Play equipment set within grass. No surfaced paths to play equipment.	109	Good	8	5	5	0	1	19	Reasonable Play Value	Potential for greater natural landscaping.
M/PS/EL/23/018	Linkwood Playingfield	Elgin	Private	LEAP	0-4	Small unfenced play area close to shops and services at Thornhill and in close proximity to playing pitches. Limited range of equipment so suitable for younger children only.	Low	Reasonable condition but signs of wear and aged appearance.	Play equipment set within bark. No surfaced paths to play area/equipment.			6	1	4	0	1	12	Poor Play Value	Expand range of equipment. Improve accessibility.
M/PS/EL/23/019	Roseilse Place	Elgin	Private	LAP	0-4	Very small playspace with very limited equipment. Suitable for very young children only.	Low	Older wooden equipment with signs of wear and fading.	Play equipment set within bark.			5	5	4	0	2	16	Poor Play Value	
M/PS/EL/23/020	Thornhill Estate East - School/Dyke Walk	Elgin	Moray Council	LEAP	5-17	Play park close to but not within grounds of New Elgin Primary school. Range of equipment for varying abilities. Houses back onto the playpark.	Medium	Reasonable condition with signs of ageing and wear.	Play equipment set within grass. Surfaced footpath through playpark but not too equipment.	132	Fair	8	8	7	1	2	26	Good Play Value	
M/PS/EL/23/021	Doocot Park	Elgin	Moray Council	NEAP	0-17	Play area set within wider neighbourhood park that includes football pitches. Good range of play equipment for wide age range.	High	Reasonable condition but signs of wear and aged appearance.	Play equipment set within bark areas contained by raised wooden edge. Play area is set within area of hardstanding. Park close to busy roads.	141	Fair	7	8	8	0	2	25	Good Play Value	
M/PS/EL/23/022	Thornhill Central	Elgin	Moray Council	LAP	0-4	Small play area surrounded by housing with limited play equipment. Accessed through narrow paths between houses.	Low	Older equipment with signs of wear and fading.	Surfaced area and paths around play equipment.	91	Fair	6	2	3	0	0	11	Poor Play Value	Consider function of space and its relationship to nearby M/PS/EL/23/020 Thornhill Estate East - School/Dyke Walk. Potential opporunity for natural play.
M/PS/EL/23/023	Marleonfield Play Area	Elgin	Private	LEAP	0-11	Small fenced play area with limited range of equipment. Located at end of key access to neighbourhood.	Medium	Reasonable condition but signs of wear and ageing.	Play equipment set within bark with surfaced path to gated entrance.			6	4	5	0	1	16	Poor Play Value	
M/PS/EL/23/024	Bain/McMillan Avenue	Elgin	Private	LEAP	0-15	Play area set at one end of wide open green space. Currently fenced off.	Medium	Equipment currently fenced off.	Paths to play area. Play equipment fenced off but set within bark.			4	5	6	0	1	16	Poor Play Value	Playpark to be moved and replaced when housing development progressess.

Ref	Name	Town	Owner	Type	Age	Description	Catchment	Condition	Access Notes	No.	Rating	S1	S2	S3	S4	S5	Total	Play Value	Comments
M/PS/EL/23/025	Manitoba	Elgin	Moray Council	LEAP	0-11	Play area set within open greenspace that connects through housing forming square. Provides a range of equipment.	Medium	Older equipment with signs of wear and fading.	Main play strucutre set within bark with step down from surrounding grass area. Swings set in grass. No surfaced paths to equipment	122	Fair	6	5	6	0	2	19	Reasonable Play Value	
M/PS/EL/23/026	Stonecrosshill Elgin	Elgin	Other	LEAP	0-15	Play area overlooked by houisng offering good range of equipment .	High	Good condition.	Play equipment set within bark with raised timber ridge around edge. No surfaced paths within or to play area.		Good	6	8	7	1	2	24	Good Play Value	
M/PS/EL/23/027	Reynolds Crescent	Elgin	Other	LEAP	0-15	Well equipped play area located to the rear of housing.	Medium	Good conditon.	Play equipment set within brightly coloured wet pour. Lit paths to play area.			6	8	7	2	2	25	Good Play Value	
M/PS/EL/23/028	Pinefield	Elgin	Moray Council	LEAP	5-15	Fenced play area set within wider green space overlooked by housing. Good range of equipment including for older children.	Medium	Signs of wear and tear with vandalism evident.	Play equipment set with bark with raised wooden edge containing this. Paths into fenced area.	118	Fair	6	5	8	0	1	20	Reasonable Play Value	
M/PS/EL/23/029	Kintrae Crescent	Elgin	Private	LAP	0-4	Very small fenced playspace suitable for toddlers with limited range of equipment.	Low	Overall good condition some signs of weathering.	Play equipment mainly in bark with bouncer on grass. Surfaced path into play area.			6	5	5	1	1	18	Reasonable Play Value	
M/PS/EL/23/030	Calcots Crescent	Elgin	Private	LAP	0-11	Small play area with limited range of equipment to rear of housing accessed via narrow lit path.	Medium	Older equipment with signs of wear and fading.	Play equipment in bark with raised timber edge. Good surfaced path to play area.			6	4	7	1	2	20	Reasonable Play Value	
M/PS/EL/23/031	Beechfield Road	Elgin	Moray Council	LAP	0-11	Fenced play area with reasonable range of equipment. Limited overlooking given corner location.	Medium	Reasonable conditon with signs of wear and fading.	Play equipment on matting and accessed via paved surfaces.	121	Good	6	5	6	0	1	18	Reasonable Play Value	
M/PS/EL/23/032	Thornhill Estate West	Elgin	Moray Council	LAP	0-11	Small play park at the end cul de sac with small range of equipment.	Medium	Old equipment with signs of weathering.	Play equipment located within grass. No surfaced paths.	82	Fair	5	2	3	0	0	10	Poor Play Value	Consider function of space in relation to other spaces nearby and consider opportunities for natural play.
M/PS/EL/23/033	Seafield (Brodie Drive)	Elgin	Moray Council	LEAP	5-15	Play area within large open space. Large climbing structure with slide but otherwise limited equipment.	Medium	Some equipment removed at time of site visit. Remaining equipment in reasonable condition with signs of wear.	Climbing structure set in bark with rest on grass without surfaced paths to equipment.	110	Fair	7	5	5	0	1	18	Reasonable Play Value	Wider space has opportunties for planting.
M/PS/EL/23/034	Gleneagles Drive	Elgin	Private	LAP	0-11	Toddler play area on small open space within residential development.	Medium	Good condition with signs of ageing and wear.	Play equipment set within bark. Surfaced path to edge of bark pit.			5	6	7	1	1	20	Reasonable Play Value	
M/PS/EL/23/035	Duffus Crescent	Elgin	Private	LEAP	5-11	Fenced play park well overlooked by surrounding housing with small range of play equipment.	Medium	Good condition with signs of ageing and wear. Some equipment removed.	Play equipment set within bark or grass. Good surfaced path through play area but not to equipment.			6	6	6	0	1	19	Reasonable Play Value	
M/PS/EL/23/036	Hardhillock Avenue	Elgin	Other	LAP	5-11	Grassed area to rear of housing. Play equipment limited to a basketball hoop.	Low	Poor condition, equipment removed.	Grass area accessed through paths leading from quiet roads.			5	1	2	0	0	8	Poor Play Value	Review space in context of neighbouring play opportunties.
M/PS/EL/23/038	Greenwards Primary School Play Area	Elgin	Moray Council	LEAP	5-11	Play area within school grounds with range of colourful equipment for a variety of ages. Access resrticted during school hours.	High	Signs of ageing and wear.	Play equipment located on wet pour.		Fair	5	8	7	0	1	21	Reasonable Play Value	Replacement of equipment programmed.
M/PS/EL/23/039	West End Primary School	Elgin	Moray Council	LAP	5-11	Play area within school grounds with range of wooden equipment for a variety of ages. Basket ball hoops and green spaces. Access restricted during school hours.	High	Reasonable condition with signs of ageing and wear.	Play equipment located on wet pour within tarred playground.		Fair	6	6	2	1	2	17	Reasonable Play Value	

Ref	Name	Town	Ownership	Type	Age	Description	Catchment	Condition	Access/Surfacing	Area	Quality						Total	Play Value	Comments
M/PS/EL/23/040	New Elgin Primary School	Elgin	Moray Council	LAP	5-11	Play area within school grounds with good range of play equipment. Access restricted during school hours.	Medium	Reasonable condition with signs of ageing and wear.	Play equipment located within grass and within tarred playground.		Fair	6	5	8	3	1	23	Good Play Value	
M/PS/EL/23/042	Bishopmill Primary School	Elgin	Moray Council	LEAP	0-11	Play equipment within school grounds. Small play set with slide fenced off. Wooden agility play equipment. Access restricted during school hours and not well overlooked.	Medium	Reasonable condition signs of age and wearing.	Equipment surrounded by grass mats. No surfaced paths to		Fair	7	7	5	0	2	21	Reasonable Play Value	
M/PS/EL/23/043	Birse Park/Nasmith Crescent	Elgin	Private	LEAP	0-11	Well overlooked fenced play park in attractive landscaped setting. Provides a good range of equipment for size with seating.	Medium	Good new condition.	Surfaced path to gated entrance only. Grass matting around play equipment which has lifted in places.			7	7	6	1	2	23	Good Play Value	
M/PS/EL/23/044	Fyvie Green	Elgin	Private	LEAP	0-11	Well overlooked small play park with good range of wooden play equipment.	Medium	Good new condition.	Set within grass.			7	7	7	1	1	23	Good Play Value	
M/PS/EL/23/045	Jasmine Drive	Elgin	Private	LEAP	0-11	Small play park serving new housing development	Low	Very good	Accessed over grass with grass mats around equipment. Good surfaced paths around edge of play area.			7	6	6	0	1	20	Reasonable Play Value	
M/PS/EL/23/046	Elgin Sport Centre	Elgin	Private	LEAP	0-11	Small brightly coloured play park with good level of inclusive play equipment.	High	Very good	Wet pour surfaces			6	5	5	1	2	19	Reasonable Play Value	
M/PS/FC/23/001	Milnecroft Play Area	Fochabers	Private	LAP	0-11	Small play area on edge of housing with limited play equipment. Well maintained green space.	Low	Older equipment with signs of wear and fading.	Paths to play equipment. Sloping site.			6	4	3	0	1	14	Poor Play Value	
M/PS/FC/23/002	Fochabers Playing Field	Fochabers	Moray Council	NEAP	0-17	Play park set close to playing field, tennis courts and public toilets (seasonal opening). Good range of equipment for variety of ages and fenced from road. Outdoor gym equipment.	High	Reasonable condition with signs of age and wear. Gym equipment good condition.	Play equipment set within bark with raised bark around. No path to play equipment (grass).	141	Fair	8	8	9	0	2	27	High Play Value	
M/PS/FD/23/001	To south of Morvern Crescent	Findochty	Moray Council	LEAP	0-15	Play park set in sloping grass field to rear and side of houses. Play equipment for older children.	Medium	Good condition with signs of age and wear. Surrounding surfaces require maintenance.	Play equipment set within bark pits. Paths to play equipment but maintenance required.	126	Good	4	6	7	0	1	18	Reasonable Play Value	Potential to improve surfaces and incorporate benches/seating.
M/PS/FH/23/001	Findhorn Playing Field	Findhorn	Other	LEAP	0-17	Play park beside playingfield and tennis courts. Good variety of bright play equipment.	High	Reasonable conditon.	Play equipment in bark.	138	Fair	7	8	8	0	2	25	Good Play Value	
M/PS/FR/23/001	Forbeshill Playspace	Forres	Moray Council	LEAP	5-11	Small play area with limited range of basic play equipment.	Medium	Reasonable conditon with signs of wear and fading.	Play equipment in grass. No paths to equipment.	120	Good	7	6	4	0	1	18	Reasonable Play Value	
M/PS/FR/23/002	Bogton Road Park	Forres	Moray Council	LEAP	0-11	Play park with limited equipment set within wider landscaped area.	Medium	Reasonable conditon with signs of wear and fading.	Play equipment in grass.	106	Good	8	6	5	0	1	20	Reasonable Play Value	
M/PS/FR/23/003	Grant Park	Forres	Moray Council	Destination	0-11	Play area set within central public park with toilets and parking. Fenced play area for younger children with	Medium	Good conditon with signs of wear and fading.	Play equipment set within bark.	137	Good	8	6	6	1	2	23	Good Play Value	Opportunity to create a destination that reflects the importance of the space and caters for a greater range of abilities.
M/PS/FR/23/004	Falconer Avenue	Forres	Private	LEAP	5-11	Small play area close to community facilties. Range of wooden play equipment.	Medium	Good condition with some signs of wear.	Play equipment set with bark pit with raised wooden edge. No surfaced paths to play area.			7	6	5	0	1	19	Reasonable Play Value	
M/PS/FR/23/005	Califer Road	Forres	Moray Council	LEAP	0-11	Play area set within green square surrounded by housing. Good range of play equipment.	Medium	Signs of age/wear and deteriorating condition.	Play equipment set within bark pits with raised timber edge. Flat space with surfaced paths to edge of bark.	120	Poor	5	7	6	0	2	20	Reasonable Play Value	

Ref	Name	Town	Owner	Type	Age	Description		Condition	Access	Area	Rating						Total	Play Value	Notes
M/PS/FR/23/006	Randolph Lane/Pilmuir Playing Field	Forres	Moray Council	LEAP	0-11	Play area set beside playingfield. Located on path network. Climbing structure with slide in fenced area.	Medium	Old and worn appearance.	Set within flat grassed area. Surfaced paths don't lead to equipment.	96	Poor	8	3	4	0	1	16	Poor Play Value	
M/PS/FR/23/007	Mannachie Park	Forres	Moray Council	NEAP	0-11	Play area located close to a number of neighbourhoods. Recently updated and provides a good range of equipment for different ages and abiliies.	Medium	Very good condition.	Equipment set within grass mats and accessed from surface path over grass.	140	Good	8	8	7	2	2	27	High Play Value	Recently installed play equipment
M/PS/FR/23/008	West of Thornhill - Twinning Link	Forres	Private	LEAP	0-11	Play area within wider area of grassed open space. Play equipment for younger children.	Medium	Equipment has worn appearance and at time of site visit swing set broken.	Equipment set within bark with raised timber edge round perimter. No paths across grass to play area.			6	6	6	0	2	20	Reasonable Play Value	
M/PS/FR/23/009	Fleurs Place	Forres	Moray Council	LEAP	0-11	Play area adjacent to small grass pitch. Fenced from road and burn. Small range of equipment primarily for younger children with climbing structure for older children.	Medium	Reasonable condition with signs of age and wear.	Grass mats around equipment. No paths across grass to play equipment.	129	Good	8	8	8	0	2	26	Good Play Value	
M/PS/FR/23/010	Thornhill Housing Estate	Forres	Moray Council	LAP	0-11	Play area within grass landscaped area between houses. Small range of equipment.	Low	Older equipment with signs of wear and fading.	No paths to play equipment. Flat surfaced paths through wider green space.	89	Good	5	2	3	0	2	12	Poor Play Value	Consider role of play area in context of other play areas nearby.
M/PS/FR/23/011	Balnageith Rise	Forres	Private	LEAP	0-11	Play park located to rear of housing and accessed via narrow paths. Range of play equipment provided.	Medium	Reasonable condition with signs of age, wear and fading.	Play equipment set within bark pits. Paths through play area but not to equipment.			6	7	7	0	2	22	Good Play Value	
M/PS/FR/23/012	Cumiskie Crescent	Forres	Private	LEAP	0-11	Well overlooked small play area set within grassed square. Range of equipment primarily for younger children.	Medium	Good condition.	Play equipment set within bark pit with raised timber edge. Path leading to play area is bark.			6	6	4	0	1	17	Reasonable Play Value	
M/PS/FR/23/013	Lapwing View	Forres	Private	LEAP	0-11	Well overlooked play area within grass landscaped square. Good range of timber equipment.	Medium	Good condition.	Grass mats around equipment. No paths across grass to play equipment.			6	7	7	0	1	21	Reasonable Play Value	
M/PS/FR/23/014	Roysvale Park	Forres	Moray Council	LEAP	0-11	Large grass playing fields with limited range of play equipment (swings) on edge.	Medium	Older equipment with signs of wear and fading.	Play equipment set within grass. Good path network through wider open space.	82	Good	7	4	3	0	2	16	Poor Play Value	Consider role of play area in context of other play areas and wider open space.
M/PS/FR/23/015	Anderson's Primary School Forres	Forres	Moray Council	LEAP	5-11	Play equipment within school grounds including agility style equipment and bouldering style rock. Access restricted during school hours.	High	Reasonable condition	Play equipment set within surfaced playground.		Fair	6	6	4	0	1	17	Reasonable Play Value	
M/PS/GM/23/001	Recreation Ground Garmouth	Garmouth	Other	LEAP	0-11	Village recreational ground with play area, grass playing field and picnic benches. Car parking adjacent with toilets open seasonally. Good range of play equipment. Covered pavilions with seating.	Medium	Good conditon with signs of wear and fading.	Play equipment set within bark with raised timber edge. Whilst play area is enclosed by wall nearby entrance is onto a road with no pavement.	135	Good	8	8	8	0	2	26	Good Play Value	

Ref	Name	Settlement	Owner	Type	Age	Description	Access	Condition	Accessibility	No.	Rating						Total	Play Value	Notes
M/PS/HP/23/001	Farquhar Street	Hopeman	Moray Council	LEAP	5-11	Small play area within square overlooked by housing. Brightly coloured good range of equipment. Square is unfenced and open to residential road.	Medium	Good bright conditon.	Grass mats around equipment. No paths across grass to play equipment.		Good	6	6	7	0	2	21	Reasonable Play Value	
M/PS/HP/23/002	Hopeman Playing Field	Hopeman	Moray Council	LEAP	5-15	Village playing fields with playpark, playing field and skate ramps. Good range of equipment for variety of age groups including traditional play equipment and wooden agility style equipment.	Medium	Signs of age/wear and deteriorating condition.	Located within grassed area with climbing structure in bark pit. Improve accessibilty mobility impaired.	144	Poor	8	7	8	2	2	27	High Play Value	
M/PS/HP/23/003	Meadow View	Hopeman	Private	LEAP	5-11	Small playspace located within landscaped area of residential development. Equipment largely agility style equipment.	Medium	Good condition with some signs of wear.	Located within grassed area with dropped kerb but no surfaced paths.			6	6	6	0	1	19	Reasonable Play Value	
M/PS/KE/23/001	Den Playing Field Keith	Keith	Moray Council	LEAP	0-11	Play area within wider grassed open space. Good range of equipment.	Low	Reasonable conditon with signs of wear and fading.	Play equipment located in bark pits. No surfaced paths across grass to play equipment.	120	Good	6	5	5	0	1	17	Reasonable Play Value	
M/PS/KE/23/003	Cuthil Park Keith	Keith	Moray Council	LEAP	0-17	Public park with attractive landscaped setting with play area, pitch and skate ramp . Bright range of play equipment for a variety of age groups.	High	Good condition.	Play equipment located within grass. Lit surfaced paths through play park.	139	Good	8	9	9	1	2	29	High Play Value	
M/PS/KE/23/004	Braeside Housing Keith	Keith	Moray Council	LAP	0-11	Playpark to rear of housing with small range of equipment.	Medium	Reasonable conditon with signs of wear and fading.	Play park located at top of hill with stepped access.	109	Good	6	5	5	0	2	18	Reasonable Play Value	Consider role of play area in context of other play areas and wider open space.
M/PS/KE/23/005	St Rufus Park Keith	Keith	Moray Council	Destination	0-15	Centrally located public park with attractive landscaped setting with play area, outdoor gym and tennis courts. Wide range of play equipment for a variety of age groups.	High	Reasonable conditon with some equipment showing signs of fading/wear.	Play park located on flat part of public park. Most equipment located within grass area with paths around perimeter but not to play equipment.	143	Fair	8	8	8	0	2	26	Good Play Value	
M/PS/KE/23/006	Fife Park Keith	Keith	Moray Council	LEAP	0-11	Small play area adjacent to football pitches. To rear of housing estate.	Medium	Good condition with some new equipment.	Play equipment located in bark pits with raised timber edge. Play area accessed through grass.	128	Good	7	6	8	0	2	23	Good Play Value	
M/PS/KE/23/008	Colvin Court	Keith	Private	LEAP	0-11	Small play park with limited range of equipment.	Medium	Good conditon with signs of wear and age.	Play equipment located in bark pits. No surfaced paths across grass to play equipment.			5	3	6	0	1	15	Poor Play Value	
M/PS/KE/23/009	Nelson Court	Keith	Other	LEAP	0-11	Play park to rear of housing with good range of bright equipment. Narrow paths to play area.	Medium	Reasonable conditon with signs of wear and fading.	Play equipment located within tarred area.			6	6	7	0	2	21	Reasonable Play Value	
M/PS/KE/23/011	Nelson Terrace Keith	Keith	Moray Council	LEAP	0-11	Play park to rear of housing with good range of equipment.	Medium	Good conditon with some new equipment.	Play equipment located in bark pits. Surfaced paths to play area.	124	Good	5	6	7	0	2	20	Reasonable Play Value	
M/PS/KK/23/001	Knock Playing Field	Knock	Other	LEAP	0-11	Play park adjacent to playingfield with good range of equipment given location.	Medium	At time of inspection equipment was worn and faded with some of this broken. However, replacement work appeared to be ongoing.	Play equipment located in bark pits accessed from grass field. Playingfield accessed off narrow countryroad with small grass verge (no pavement).	134	Fair	4	7	6	0	2	19	Reasonable Play Value	
M/PS/KN/23/001	Southside Main Playground - South Road	Kinloss	Other	LEAP	0-11	Playpark close to housing with good range of equipment.	Medium	Good condition.	Good accessibility.			6	8	7	2	2	25	Good Play Value	

Ref	Name	Settlement	Owner	Type	Age	Description	Usage	Condition	Accessibility	No.	Rating	S1	S2	S3	S4	S5	Total	Play Value
M/PS/KN/23/002	Tenchard Crescent	Kinloss	Other	LEAP	0-11	Fenced playpark in Square surrounded by housing providing a good range of equipment. Managed by MOD.	Medium	Condition excellent.	Good accessibilty .			6	6	7	2	2	23	Good Play Value
M/PS/KN/23/003	Burnside	Kinloss	Other	LEAP	0-11	Playpark with grass open space to rear of housing with some overlooking. Bright colours with good variety of play opportunities.	Medium	Condition excellent.	Good accessibilty .			6	7	8	2	2	25	Good Play Value
M/PS/KN/23/004	North Road Play Area	Kinloss	Other	LEAP	0-11	Attractive play space close to housing. Primarily for younger children.	Medium	Good condition.	Good accessiblity.			6	6	5	2	2	21	Reasonable Play Value
M/PS/KN/23/005	Kinloss Primary School	Kinloss	Moray Council	LEAP	0-17	Play opportunities within school playground provide a a good variety of play opportunities. Access restricted during school hours.	High	Good condition.	Good accessiblity. Access restricted during school hours.		Good	7	7	9	6	2	31	High Play Value
M/PS/KO/23/001	Tamdhu Distllery	Knockando Low	Other	LAP	0-11	Fenced play area within distillery grounds and located behind buildings. Limited range of equipment with an old fashioned appearance.	Low	Reasonable condtion given age.	Narrow path through grass to play equipment.	77	Poor	3	3	4	0	1	11	Poor Play Value
M/PS/KS/23/001	Kingston Playingfield	Kingston	Moray Council	LEAP	5-11	Play area adjacent to playing field beside beach with benches and parking nearby. Good range of colourful equipment.	Low	Older equipment with signs of wear and fading but reasonable condtion overall.	Play area accessed along flat surfaced path. Play equipment set within grass with no paths directly to this.	101	Fair	6	8	7	0	1	22	Good Play Value
M/PS/KU/23/001	Knockando Primary School	Knockando Upp	Moray Council	LEAP	0-17	Play area within school grounds with a wide variety of play opportunties including an outdoor gym. Access restricted during school hours.	Medium	Varying condtion of play equipment ranging from good to equipment fenced off not for use.	Accessed through grass. School grounds remote from housing.		Fair	6	8	4	2	2	22	Good Play Value
M/PS/LB/23/001	Woodlands Drive/Drumbeg Crescent	Lhanbryde	Private	LEAP	0-4	Small play area suitable for younger children only. Set to rear of housing within a green space.	Low	Older equipment with signs of wear and fading.	Play equipment set within bark. Surfaced path to play area.			7	6	5	0	1	19	Reasonable Play Value
M/PS/LB/23/002	Playingfield	Lhanbryde	Moray Council	LEAP	0-11	Grassed area close to school with good range of brightly coloured play equipment and benches nearby.	Medium	Some equipment appears new.	Play equipment set within grass. Surfaced path along edge of play area.	138	Good	8	8	7	1	2	26	Good Play Value
M/PS/LG/23/001	Logie Primary School	Logie	Moray Council	LEAP	0-11	Small play park within school grounds. Access restricted during school hours.	Medium	Older equipment in reasonable condition.	Set within flat grassed area. School location means play equipment is remote from housing.		Good	7	8	3	0	2	20	Reasonable Play Value
M/PS/LM/23/001	Coulardbank Crescent	Lossiemouth	Other	LEAP	0-11	Small well equipped play park with brightly coloured surfaces with transport/road theme. Primarliy for younger children	Medium	Excellent condition.	Located on quiet street. Good level wet pour surfaces to access play equipment.			6	7	7	1	2	23	Good Play Value
M/PS/LM/23/003	Freeman Way	Lossiemouth	Other	LEAP	0-11	Play space with two distinct areas set within grassed area with a good range of play equipment.	Medium	Excellent condition.	Located on quiet street. Good level wet pour surfaces to access play equipment.			6	8	7	1	2	24	Good Play Value

Ref	Name	Town	Owner	Type	Age	Description	Level	Condition	Access	No.	Quality	S1	S2	S3	S4	S5	Total	Play Value	Notes
M/PS/LM/23/004	High School	Lossiemouth	Moray Council	NEAP	0-15	Playpark beside playingfield and close to Lossiemouth High School. Good range of equipment for variety of ages.	High	Good condition.	Play equipment located within bark pits with raised timber edge. Sloping sufaced access path does not extend to play equipment. Access for most visitors is likely to require crossing Coulardbank Road.	145	Good	7	7	8	0	2	24	Good Play Value	
M/PS/LM/23/005	Lossiemouth High School	Lossiemouth	Moray Council	LAP	0-4	Small fenced play area for younger children. Limited range of equipment.	Medium	Older equipment with signs of wear and fading but in reasonable condition. Benches signa of degradation.	Unsurfaced informal path. Play equipment located in bark pit.		Good	8	4	4	1	1	18	Reasonable Play Value	
M/PS/LM/23/006	Old Station Park	Lossiemouth	Moray Council	LEAP	0-11	Play park set within landscaped area of old railway station/esplanade. Variety of brightly coloured play equipment. Noted informal skate ramps.	Medium	Signs of wear and fading but in reasonable condition.	Surfaced paths to edge of play park. Play equipment set within bark surfaces.	132	Good	8	5	3	0	2	18	Reasonable Play Value	
M/PS/LM/23/007	Commerce Street/Brander Street	Lossiemouth	Moray Council	LEAP	0-15	Play park located within grassed areas close to foreshore. Variety of equipment for range of ages.	Medium	Older equipment with signs of wear and fading but in reasonable condition.	Playpark surfacing is bark with raised timber permiter with no paths into play area. Slope to edge of Commerce Street.	127	Fair	5	6	5	0	2	18	Reasonable Play Value	
M/PS/LM/23/009	Boyd Anderson/Coulardbank	Lossiemouth	Moray Council	LEAP	0-11	Well overlooked play area within centre of neighbourhood with range of equipment.	Medium	Reasonable conditon.	Play equipment located within grass. Surfaced paths to play area but not to equipment. Path network allows access for a large number of houses without crossing roads.	119	Fair	8	5	5	0	1	19	Reasonable Play Value	
M/PS/LM/23/010	Shackleton Place	Lossiemouth	Moray Council	LAP	5-11	Small play area wih limited range of play equipment. Overlooking limited due to orientation of housing.	Low	Older equipment with signs of age and wear.	Play equipment located within matting that is slightly raised from surrounding paving.	94	Good	5	1	3	0	1	10	Poor Play Value	Consider role of play area in context of other play areas and wider open space.
M/PS/LM/23/011	Hythehill Playspace	Lossiemouth	Other	LEAP	5-11	Play area close to Hythehill School with range of equipment primarily for younger children. Well overlooked by neighbouring housing.	High	Good condition.	Play park is sloped. Play equipment set within wet pour. Surfaced path runs adjacent to play area but does not lead to play equipment.			7	7	5	0	1	20	Reasonable Play Value	
M/PS/LM/23/012	South Of Covesea Terrace	Lossiemouth	Other	LAP	0-11	Small fenced play area located between housing. Limited range of equipment primarily for younger children.	Medium	Reasonable condtion given age.	Reasonable access. Wet pour and surfaced paths to play equipment.			4	5	3	0	2	14	Poor Play Value	
M/PS/LM/23/015	St Gerardines Primary School	Lossiemouth	Moray Council	LEAP	5-11	Play area within school grounds. Access restricted during school hours.	High	Reasonable conditon.	Access good. Restricted access during school hours.		Fair	7	8	5	0	2	22	Good Play Value	
M/PS/LM/23/016	Hythehill Primary School	Lossiemouth	Moray Council	LEAP	5-11	Play area within school grounds. Access restricted during school hours.	High	Reasonable conditon.	Access good. Restricted access during school hours.		Good	6	6	3	0	2	17	Reasonable Play Value	
M/PS/LT/23/001	Lintmill Housing	Lintmill	Moray Council	LEAP	5-11	Village play area to the rear of housing set within grassed area. Provides a good range of equipment.	Medium	Good condition with some signs of ageing.	Flat grass area. No paths to play area.	124	Good	6	6	6	0	1	19	Reasonable Play Value	
M/PS/MD/23/001	Miltonduff Hall	Miltonduff Nort	Other	LEAP	0-11	Play area at village hall with range of equipment primarily aimed at younger children.	Low	Good condition.	Play equipment set within bark pits with raised timber edge. Flat space with surfaced paths to edge of bark.	128		7	8	6	2	2	25	Good Play Value	
M/PS/MD/23/002	Mosstowie Primary School	Miltonduff Nort	Moray Council	LEAP	0-11	Play area within school grounds with good variety of equipment and space to play.	High	Good condition.	Access good. Restricted access during school hours.		Good	4	8	9	3	2	26	Good Play Value	

Ref	Name	Settlement	Owner	Type	Age	Description	Usage	Condition	Access	No.	Rating						Total	Play Value	Notes
M/PS/MP/23/001	Marypark Playingfield	Marypark	Moray Council	LEAP	0-11	Small play space at rear of houses. Good mix of equipment. Entry via gate between housing with no signage	Low	Reasonable condition. Some equipment appears newly installed	Access through grass which was long on day of inspection. No paths.	127	Fair	6	7	7	0	2	22	Good Play Value	Potential to make more welcoming entrance and improve access.
M/PS/MS/23/001	Speymouth Drive	Mosstodloch	Other	LEAP	0-11	Small play space on edge of housing development.	Medium	Good	Play park on flat area with grass mats. Paths runs adjacent to play area.			6	7	5	0	1	19	Reasonable Play Value	
M/PS/MS/23/002	Recreation Ground Speymouth Hall Mosstodloch	Mosstodloch	Moray Council	LEAP	0-11	Large play park adjacent to village hall. Play equipment set in grass in groups depending on age. Car parking.	High	Good condition.	Play equipment set within flat grassed area with no paths to play equipment.	138	Good	7	8	8	1	2	26	Good Play Value	
M/PS/MU/23/001	Mulben Play Area	Mulben	Other	LEAP	0-11	Playpark that sits on its own away from main settlement. Good range of equipment. Mown paths to play area.	Low	Good condition.	Mown paths to play area. Grass around play equipment			4	6	6	0	1	17	Reasonable Play Value	
M/PS/NM/23/001	Newmill Playing Field	Newmill	Other	LEAP	0-11	Play area adjacent to village playing field.	Medium	Play equipment worn and faded.	Play equipment set wtihin grass with raised timber edge. No paths to play area.	131	Fair	6	6	6	0	0	18	Reasonable Play Value	
M/PS/PG/23/001	School Playing Field Portgordon	Portgordon	Moray Council	LEAP	5-11	Play area located to the rear of school and adjacent to school playingfield. Well overlooked by housing and fenced from road. Good range of equipment but more limited for toddlers.	High	Reasonable condition some signs of fading and age.	Set within grass with surfaced paths to edge of play park/ playingfield. Access restricted during school hours.	126	Fair	6	7	8	0	2	23	Good Play Value	
M/PS/PK/23/001	Portknockie Primary School	Portknockie	Moray Council	LEAP	5-11	Small range of play equipment located within school grounds including basketball hoops.	Medium	Good condition some signs of fading and wear.	Set wtihin grass or tarmac. Access restricted during school hours.		Fair	8	7	4	0	2	21	Reasonable Play Value	
M/PS/PK/23/002	McLeod Park Portknockie	Portknockie	Moray Council	LEAP	0-11	Well overlooked play park adjacent to large grass playingfields and McBoyle Hall. Includes a range of play equipment for variety of age ranges spaced widely across play area.	Medium	Good condtion with signs of age and fading.	Set wtihin grass with no surfaced paths to play equipment or dropped kerbs to play area from roads.	137	Good	7	7	7	0	2	23	Good Play Value	
M/PS/RF/23/001	Rafford Playing Field	Rafford	Moray Council	LEAP	0-11	Play area located beside Rafford Village Hall and adjacent to playingfields. Small range of equipment.	Medium	Reasonable condtion.	Set wtihin grass within no surfaced paths to play equipmetnt.	110	Fair	7	7	7	1	2	24	Good Play Value	
M/PS/RM/23/001	Rothiemay Playing Field	Rothiemay	Other	LEAP	0-11	Play area located adjacent close to tennis courts, playingfield and sports pavilion. Fenced from road by hedging and fence to burn. Range of equipment for vareity of ages.	High	Reasonable condtion with signs of age and wearing.	Some equipment set within bark pits with rest within grass. No surfaced paths. No pavement on adjacent road.	134	Fair	8	7	8	0	2	25	Good Play Value	
M/PS/RM/23/002	Rothiemay Primary School	Rothiemay	Moray Council	LEAP	0-11	Play equipment located within school grounds. Access restricted during school hours.	High	Reasonable condtion with signs of age and wearing.	Grass and tarmac areas.		Fair	8	8	6	0	2	24	Good Play Value	
M/PS/RO/23/001	Mackessack Park Rothes	Rothes	Moray Council	NEAP	0-15	Well equipped brightly coloured play area located close to well used recreation ground. Equipment for a wide age range including sensory/music play panels. Located on good path network.	High	Recently insalled so excellend condtion at time of inspection.	Wet pour surface around most equipment with agility style equipment set in grass.	141	Good	7	8	8	2	2	27	High Play Value	
M/PS/RO/23/002	Rothes Primary School	Rothes	Moray Council	LEAP	5-11	Small range of play equipment set wtihin school grounds.	Medium	Reasonable condtion.	Set within tarmac playground. Access restricted during school hours.		Fair	6	6	3	0	2	17	Reasonable Play Value	

Ref	Name	Location	Owner	Type	Age	Description	Level	Condition	Access	No.	Rating	S1	S2	S3	S4	S5	Total	Play Value	Comments
M/PS/RR/23/002	Brodie Castle Advenuture Playground	Rural	Other	LEAP	0-15	Well equipped play area to rear of Brodie Castle. Includes equipment for a variety of ages with toddler play including sand as well as zip line and climbing for older children.	Low	Good condtion.	Acess is through Brodie Castle grounds with parking chargeable. Equipment set within bark.			7	7	7	0	1	22	Good Play Value	
M/PS/RR/23/003	Redstone Play Area Darnaway	Rural	Other	LEAP	0-11	Small play park in rural area beside grass playingfield. Includes small range of equipment including a toddler play structure as well as for older children.	Low	Old and aged appearance.	Flat grass area. No paths to play area.	112	Good	6	5	6	0	1	18	Reasonable Play Value	
M/PS/RR/23/004	Logie Steading Play Area	Rural	Other	LEAP	0-11	Attrractive playpark associated with shops and café at Logie Steading. Includes a range of equipment with a focus on agility and swinging.	Medium	Good well maintained condition.	Set wtihin flat grass field with play equipment located within bark. Close to waymarked walks.			7	9	6	1	2	25	Good Play Value	
M/PS/RR/23/005	Ternemney Houses - Knock	Rural	Moray Council	LAP	0-11	Small fenced play area to rear of houses with play opporutnities restricted to swing set.	Low	Old and aged appearance.	Set within grass.	73	Poor	4	1	2	0	0	7	Poor Play Value	Consider in context of other play opporunities.
M/PS/RR/23/006	Spey Bay Hall	Rural	Other	LEAP	0-11	Play area to side of Spey Bay Hall with attractive wooden play equipment.	Medium	Generally reasonable conditon although some equipment noted to be broken.	Set within wet pour.	132	Fair	5	6	8	2	1	22	Good Play Value	
M/PS/RR/23/007	Glenlivet Primary School	Rural	Moray Council	LEAP	5-11	Play area located within school grounds. Small range of equipment.	Medium	Reasonable condition.	Set wtihin grass. Access restricted during school hours.		Good	7	8	4	0	2	21	Reasonable Play Value	
M/PS/RR/23/008	Roseilse Forestry Play Area	Rural	Other	LAP	5-15	Small play area associated with Roseisle woods managed by Forestry and Land Scotland	High	Good condition.	Equipment set within sand.	104	Good	5	8	7	4	2	26	Good Play Value	
M/PS/RR/23/009	Tomnavoulin Housing	Rural	Moray Council	LAP	0-11	Small play area at gable end of houses.	Low	Equipment aged and worn with improvements planned.	Level surface.	62	Poor	5	1	1	0	0	7	Poor Play Value	Programmed for upgrade
M/PS/RT/23/001	Rathven Play Area Kirk Road	Rathven	Moray Council	LEAP	0-11	Play park in greenspace overlooked by rear of houses. Small range of equipment. Part of larger green space.	Medium	Reasonable condition.	Level grass surface.	100	Fair	5	6	7	0	2	20	Reasonable Play Value	
M/PS/TO/23/001	Tomintoul Play Area	Tomintoul	Moray Council	LEAP	0-11	Well overlooked village play area with reasonable range of equipment.	Medium	Good condtion with signs of age.	Set within grass. Sloped ramp down to play area.	127	Good	7	7	6	0	2	22	Good Play Value	
M/PS/TO/23/003	Tomintoul Adventure Playground	Tomintoul	Other	LEAP	0-11	Adventure play ground in woodland setting. Primarily agility style equipment for climbing, balancing, jumping	High	Good condition.	Set within grass.	104	Good	5	7	7	2	2	23	Good Play Value	
M/PS/UQ/23/001	Urquhart Playing Field	Urquhart	Moray Council	LEAP	0-11	Village play area beside playingfields with good range of play opportunties. Not well overlooked.	Low	Older equipment with signs of wear and fading.	Equipment set within bark pits. Grass surrounding within no surfaced paths.	136	Fair	6	6	7	0	1	20	Reasonable Play Value	

REPORT TO: SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024

SUBJECT: DRAFT LOCAL HEAT AND ENERGY EFFICIENCY STRATEGY

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

1.   REASON FOR REPORT

1.1   To seek the agreement of the Council to approve the draft Moray Local Heat and Energy Efficiency Strategy (LHEES) and Delivery Plan ahead of public consultation.

1.2   This report is submitted to Council in terms of Section III (F) (33) of the Council's Scheme of Administration relating to providing, developing and monitoring the Council's Economic Development and Infrastructure Services.

2.   RECOMMENDATION

2.1   **It is recommended that Council:-**

(i)   approves the draft Local Heat and Energy Efficiency Strategy (LHEES) (Appendix 1) and Delivery Plan (Appendix 2); and

(ii)   notes that, following public consultation on the draft strategy and delivery plan, the final versions will be presented to Council on 26 June 2024 for approval.

3.   BACKGROUND

3.1   The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 places a duty on Moray Council to prepare, publish and update a Local Heat and Energy Efficiency Strategy and Delivery Plan. The Order required the Council to produce its first LHEES strategy and delivery plan by 31 December 2023, and at no more than 5-year intervals thereafter. For the reasons set out in paragraph 3.3 the Council was unable to meet this deadline.

3.2   LHEES delivers area-based planning for the heat transition, supporting achievement of statutory emissions reduction targets. It provides the basis for decarbonising heat in buildings and improving energy efficiency across entire local authority areas.

3.3 The Scottish Government provided funding to enable the Council to resource LHEES development. It had been planned to employ a temporary member of staff for 3 years to prepare and progress the work, but this was agreed as a saving by the Council on 1 March 2023 noting that the government funding was neither ring fenced nor conditioned in this respect. Work has since been led by the existing climate change team in addition to existing statutory duties. This has slowed progress and meant that the deadline set by the Order was not met, but this is the case in a number of local authorities across Scotland. Consultancy support was required for data analysis, mapping and stakeholder engagement work. The cost of this was met using part of the Scottish Government funding.

4. DRAFT STRATEGY AND DELIVERY PLAN

4.1 A draft Moray LHEES Strategy (**Appendix 1**) and Delivery Plan (**Appendix 2**) has been produced and Officers welcome comments from members on these documents.

4.2 The draft strategy and delivery plan have been produced in collaboration with key partners across Moray and have been subject to a variety of stakeholder engagement exercises, including with Elected Members. The Scottish Government has been kept updated throughout policy development and has reviewed drafts at key stages.

4.3 Moray's LHEES will serve as a platform for empowering the local people and fostering community participation in heat transition decision-making. It will support necessary planning by government and utility network operators by guiding investments through a series of seven local priorities:

1. Building sustainable and climate resilient communities
2. Maximising knowledge and awareness and ensuring certainty of success
3. A just transition for the energy system
4. Supporting a wellbeing economy, jobs and skills
5. Tackling fuel poverty and improving health
6. Improving the energy efficiency of buildings
7. Decarbonising building heat sources

4.4 Elected Members were provided with a briefing on the LHEES priorities on 5 March 2024 and had an opportunity to feedback on the approach during an open workshop session. No significant concerns were raised surrounding the priorities, though several queries were raised surrounding deliverability.

4.5 The strategy sets out the high-level approach to be taken in Moray for heat decarbonisation and energy efficiency improvements. It is designed to be indicative rather than prescriptive, and sufficiently agile to react timeously to changes in the funding and policy landscape.

4.6 Potential heat network zones are identified by the strategy and will be developed further for adoption within the Council's Local Development Plan as required by the Heat Networks (Scotland) Act 2021.

4.7 The delivery plan details how the Council, in collaboration with key stakeholders, will translate the LHEES priorities into actions. In response to members' concerns raised during the briefing session of 5 March 2024, a note has been added to each action regarding deliverability. Adequate resourcing will be requested from the Scottish Government to deliver beyond those actions which have been identified as 'deliverable within existing resources'. This request will be made once detailed action setting with action holders is complete, following approval of the final documents.

5. NEXT STEPS

5.1 A public consultation on the draft LHEES strategy and delivery plan will take place from 25 April to 16 May 2024 via the Council's website. Copies of the documents will be available for review and comments at libraries across Moray.

5.2 Following completion of the public consultation, feedback will be collated, and a final version of the strategy and delivery plan produced. This will be presented to Council at the next available opportunity of 26 June 2024.

5.3 A limited budget remains available for further consultancy support over the next 4 years to support the LHEES strategy. However, there is very limited capacity within the climate change team to implement, monitor and review the strategy and delivery plan in such a manner as required by the Order. The financial and staffing resources to deliver LHEES will be further discussed when the final documents are presented to Council in June.

6. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))
Development and deployment of a Local Heat and Energy Efficiency Strategy is an action of the Council's Climate Change Strategy 2020-2030 which supports the priorities set out in the Corporate Plan.

(b) Policy and Legal
The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 places a duty on Moray Council to prepare, publish and update a Local Heat and Energy Efficiency Strategy and Delivery Plan at intervals not exceeding 5 years.

(c) Financial implications
There are no financial implications arising from this report. However, delivery of LHEES will have significant financial implications and this will be further discussed when the final LHEES documents are presented to Council in June.

(d) Risk Implications
The Council will continue to breach its statutory duty in the Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 if it does not publish and progress a Local Heat and Energy Efficiency Strategy and

Delivery Plan. As a result, there is a risk that the Council will miss out on government funding opportunities related to this work and suffer reputational damage.

(e) Staffing Implications

The removal of the dedicated LHEES officer post has had a significant impact upon the workload of the existing climate change officers and their ability to respond to statutory duties. Delivery of LHEES will have further significant staffing implications and this will be further discussed when this matter is reported back to Council in June.

(f) Property

There are no property implications arising from this report.

(g) Equalities/Socio Economic Impact

There are no equalities/socio economic impacts at this stage. This will be considered and an equalities impact assessment carried out if necessary ahead of the final draft documents being presented to Council for approval in June 2024.

(h) Climate Change and Biodiversity Impacts

This proposal could help to address the climate emergency by developing plans to reduce carbon emissions from buildings in Moray. No significant negative climate change or biodiversity impacts have been identified.

(i) Consultations

Consultations have been undertaken with the Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Head of Housing and Property, the Programme Manager (Learning Estate), the Property Asset Manager, the Community Wealth Building Officer, the Energy Officer, the Equal Opportunities Officer, and the Democratic Services Manager, and their feedback acknowledged.

7. CONCLUSION

7.1 Council is invited to comment on and approve the draft Local Heat and Energy Efficiency Strategy and Delivery Plan ahead of public consultation.

7.2 A final version of each document will be presented to Council on 26 June 2024 for approval.

Author of Report: George Gunn, Climate Change Strategy Officer
Background Papers:
Ref: SPMAN-813460984-531

Local Heat and Energy Efficiency Strategy (LHEES) 2023 - 2028

Draft for public consultation

moray council

2023

Contents

1. Introduction

1.1 Purpose of this strategy

The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022[1] places a duty on Moray Council to prepare, publish and update a Local Heat and Energy Efficiency Strategy and Delivery Plan. These documents should be reviewed regularly and updated no later than 5 years after publication.

Moray's Local Heat and Energy Efficiency Strategy (LHEES) is at the heart of a place based, locally-led and tailored approach to the decarbonisation of heat in buildings. This strategy will underpin an area-based approach to heat and energy efficiency planning and delivery. It was developed in collaboration with key stakeholders across Moray and sets out the long-term plan for decarbonising heat in buildings and improving their energy efficiency.

The strategy:

- highlights how each segment of the building stock in Moray needs to change to meet national and local objectives, including achieving zero greenhouse gas emissions in the building sector, and the removal of poor energy efficiency as a driver of fuel poverty;

- identifies strategic heat decarbonisation zones, and set out the principal measures for reducing buildings emissions within each zone; and

- prioritises areas for delivery, against local and national priorities.

The 5-year delivery plan provides a strong basis for action by stakeholders, identifying early, low-regrets measures and areas where ongoing analysis is required. It also provides direction and informs wider energy planning in the public and private sectors. LHEES are designed to be indicative plans rather than fixed answers to the many complex and unique challenges which individual houses or neighbourhoods face. Therefore, this strategy should not be regarded as prescriptive but rather as indicative, providing an opportunity for local communities to influence the future course of the heat transition in their areas.

This strategy and delivery plan will also play a key role in helping the Council to meet its climate change aspirations and contribute to Scotland's goal of becoming net zero by 2045.

[1]The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 (legislation.gov.uk)

1.2 Strategy vision and priority areas

The vision for this Local Heat and Energy Efficiency Strategy is to:

Support Moray's just transition to a sustainable and climate resilient community by improving building energy efficiency and decarbonising heat sources.

Seven priorities (Table 1) form the basis of the strategy and delivery plan. They help to ensure that this strategy improves energy efficiency and decarbonises heat in buildings, alongside ensuring proposals are climate resilient, just, and supportive of a wellbeing economy. Priorities 1-4 are overarching strategic priorities which will underpin the work necessary to achieve Priorities 5-7. These priorities are explored in full in Chapter 4.

Table 1. LHEES priorities for Moray.

1. **Building sustainable and climate resilient communities**

2. **Maximising knowledge and awareness and ensuring certainty of success**

3. **A just transition for the energy system**

4. **Supporting a wellbeing economy, jobs and skills**

5. **Tackling fuel poverty and improving health**

6. **Improving the energy efficiency of buildings**

7. **Decarbonising building heat sources**

3

2. Structure and function

2.1 Structure

The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 establishes a two-part structure to be followed to create an LHEES for each local authority area. This involves the creation of:

- **Strategy** – a long-term strategic framework for the improvement of the energy efficiency of buildings; and the reduction of greenhouse gas emissions from the heating of such buildings.

- **Delivery plan** – sets out how the strategy will be implemented and monitored in the local authority area by LHEES stakeholders.

2.2 Function

National guidance frames the function of LHEES around six considerations (Table 2)[2].

Table 2. National LHEES considerations.

	Consideration	**Description**
Heat decarbonisation	Off-gas grid buildings	Transitioning from heating oil and LPG in off-gas areas
	On-gas grid buildings	On-gas grid heat decarbonisation
	Heat networks	Decarbonisation with heat networks
Energy efficiency	Poor building energy efficiency	Improving poor building energy efficiency
	Poor building energy efficiency as a driver for fuel poverty	Improving poor building energy efficiency where this is a driver for fuel poverty
	Mixed-tenure, mixed-use and historic buildings	Improving energy efficiency in mixed-tenure, mixed-use buildings, conservation areas

[2] Scottish Government (2022) Local heat and energy efficiency strategies and delivery plans: guidance (gov.scot)

These six considerations were used to develop the priorities pursued in this strategy as explained in Chapter 1.2 and will be explored fully in Chapter 5.

In addition, the strategy is required to:

- be evidenced-based;
- cover Moray's full building stock as far as reasonably possible;
- be developed in collaboration with stakeholders and use extensive consultation;
- be linked to any previous iteration to show progress achieved against outcomes and carry forward outstanding actions;
- demonstrate how it supports equality and addresses inequality;
- be forward looking and delivery focussed, working towards local and national targets; and
- be open and transparent regarding data used, its associated limitation in terms of scope, accuracy and coverage, and be continuously reviewed with progress monitored.

This strategy was developed by an internal team in Moray Council and through engagement with stakeholders in the public sector, private businesses and housing associations. Changeworks were commissioned to assist with external engagement and data analysis. Working alongside other local authorities in the North of Scotland, this strategy has been verified by HubNorth to ensure that the strategies are individually sound and collectively coherent to maximise opportunities to cooperate in their delivery.

The requirements to support equality and address inequality are covered under Priorities 1, 3, and 4 in Chapter 5.

The recommended methodology for creating an LHEES seeks that the strategy and delivery plan uses analysis and grouping of opportunities to identify and prioritise actions:

- **Strategic zones** – visualisation of potential ways to decarbonise buildings at a strategic level. These provide a mechanism to understand buildings' baseline performance; scale of potential; and prioritise initial areas of focus.

- **Delivery areas** – more granular level zoning presenting clusters of buildings within the same geographical area (area-based) or those with comparable characteristics with similar opportunities (theme-based).

During the development of the strategy, it was apparent that due to the rural nature of Moray, the region's varied housing stock, and dispersed nature of buildings of a similar type meant that there were less opportunities to geographically zone and cluster solutions for buildings of the same type. However, thematic based clustering for the whole of Moray was undertaken and the results of this are explained in Chapters 5 and 6.

This analysis will help the Council and the Scottish Government to work with partners in developing new policy and actions, as well as providing an evidence based for funding applications.

3. Policy and drivers

3.1 Policy and strategy drivers

Moray Council has an increasing number of statutory duties to take action on climate change. These national obligations, along with local priorities, have directed the development of this strategy. As such, the development was primarily driven by Scotland's statutory targets for greenhouse gas emissions reduction in the Climate Change (Scotland) Act 2019; Scotland's Heat in Buildings Strategy; the Heat Networks (Scotland) Act 2021; and national fuel poverty targets.

3.1.1 National policy drivers

The key national policies influencing this strategy are detailed in Table 3 below. These will be regularly reviewed by the Council's Climate Change Officers for future updates of the LHEES to highlight any changes, and report on how they may influence ongoing delivery plans.

Table 3. Summary of national policies relevant to the development of Moray's LHEES Strategy.

Climate Change (Emissions Reduction Targets) (Scotland) Act 2019[3]	Sets a national net zero emissions target and interim targets: 75% by 2030; 90% by 2040; and 100% by 2045.
Scotland's Climate Change Plan 2018-32[4]	Contains proposals/policies for meeting greenhouse gas emissions reduction targets up to 2032. Details a vision by 2032 that a substantial majority of homes will have achieved a good energy efficiency rating.
Scotland's Heat in Buildings Strategy (2021)[5]	Presents the pathway to meet 2045 net zero emissions from buildings, alongside ensuring poor energy performance is removed as a driver for fuel poverty.
Energy Efficiency Standard for Social Housing 2 (EESSH2)[6]	Aims to improve the energy efficiency of social housing, based on a minimum Energy Performance Certificate (EPC) rating. All social housing must meet, or be treated as meeting, EPC Band B, or is as energy efficient as practically possible, by December 2032. This standard has been replaced by the Social Housing Net Zero Standard.
Social Housing Net Zero Standard (SHNZS)	This new standard will replace the second Energy Efficiency Standard for Social Housing (EESSH2) and is currently in development. Consultation on this standard closed in March 2024.
Heat Networks (Scotland) Act 2021[7]	Regulates heat networks, supporting objectives in the Heat in Buildings Strategy to grow heat network opportunities. This strategy helps Moray Council meet part of its duty within the Act by identifying potential heat network zones. Other duties excluded from this strategy are identifying non-domestic building connections; designating zones; setting up permitting, regulation, and licencing processes; and developing a cost strategy.
Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019[8]	Sets targets for 2040 focussed on eradicating fuel poverty; defines fuel poverty; requires production of a fuel poverty strategy and makes provision for reporting. Targets include: ● <5% of households in Scotland are in fuel poverty. ● <1% of households in Scotland are in extreme fuel poverty. ● Median fuel poverty gap of households in fuel poverty is <£250.

[3] Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (legislation.gov.uk)
[4] Scotland's Climate Change Plan 2018-32 (gov.scot)
[5] Scotland's Heat in Buildings Strategy (2021) (gov.scot)
[6] Energy efficiency in social housing (gov.scot)
[7] Heat Networks (Scotland) Act 2021 (legislation.gov.uk)
[8] Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 (legislation.gov.uk)

Table 4. Key targets from Scotland's Heat in Buildings Strategy (2021).

2028	2030		2033	2040	2045
Private rented homes to be EPC C	Emissions from buildings must be 68% lower than 2020 levels	Zero emissions heating in the equivalent of 50,000 non-domestic buildings	All homes to be EPC C	All fuel poor homes to be EPC B	Buildings no longer contribute to climate change
			Zero emissions heating in 170,000 off-gas fossil fuel heated homes, and 1 million on-gas homes		

In November 2023, the Scottish Government published a consultation on a Heat in Buildings Bill with proposals for legislation to:

- Prohibit the use of polluting heating systems after 2045, and before then at point of property purchase or when a heat network connection is available in a Heat Network Zone; and

- Require a minimum energy efficiency standard by 2028 for Private Rental Sector and 2033 for owner occupiers. The Scottish Government has closed it's consultation on the new Social Housing Net Zero Standard (SHNZS) in March 2024. This will replace the post-2020 Energy Efficiency Standard for Social Housing (EESSH2). This will align any new standard with net zero targets, providing clarity for the social housing sector.

It is important to be cognisant of these consultations and any resultant changes in legislation as the strategy progresses.

3.1.1.1 National Planning Framework 4
National Planning Framework 4 (NPF4) is Scotland's national spatial strategy which transforms the way planning and climate change are viewed together. It sets spatial principles, regional priorities, national developments, and planning policy. Spatial planning priorities have been developed to help guide the preparation of regional spatial strategies and local development plans. This strategy will be delivered in conjunction with the Moray Local Development Plan, consulting with communities and ensuring that development meets the needs of communities and the climate.

3.1.2 Local policy drivers
The main local policies that this strategy aligns with/supports are detailed below in Table 5. These will be regularly reviewed by the Council's Climate Change Officers for future iterations to highlight any changes, and how they influence ongoing delivery.

Table 5. Summary of local policies relevant to the development of Moray's LHEES Strategy.

Moray Local Development Plan 2020[9]	Provides guidance to residents, developers and investors as to how much and where growth is proposed for land uses, such as housing and employment, as sets out a wide range of policies which are used to determine planning applications.
Moray Economic Strategy 2022[10]	A collaborative series of actions which set out how economic growth and opportunities will be pursued in Moray.
Moray Corporate Plan 2024[11]	Details the Council's vision, values and priorities and the context for implementing these
Moray Local Housing Strategy 2019-2024[12]	Sets out the outcomes the Council and its partners want to achieve, and the actions they will take, to address housing need and demand in Moray. Forms the basis for future investment decisions in housing and related services.
Moray Council Strategic Housing Investment Plan[13]	Sets out how investment in affordable housing will be directed over the next 5 years to achieve the outcomes relating to affordable housing detailed in the Moray Local Housing Strategy.
Moray Council Housing Need and Demand Assessment[14]	Estimates how much new housing, in all tenures, is required for the next 20 years, which types of housing and their locations.
Scheme of Assistance for Home Owners and Private Tenants in Moray[15]	Details how the Council will provide advice, information and assistance to private homeowners when carrying out work on their home.
Moray Council Climate Change Strategy 2020-2030[16]	Commits the Council to reduce its carbon emissions to net zero by 2030, including a requirement for heat decarbonisation.

[9]   Moray Local Development Plan 2020 (moray.gov.uk)
[10] Moray Economic Strategy 2022 (moray.gov.uk)
[11] Moray Corporate Plan 2024 (moray.gov.uk)
[12] Moray Local Housing Strategy 2019-2024 (moray.gov.uk)
[13] Moray Council Strategic Housing Investment Plan (moray.gov.uk)
[14] Moray Housing Need and Demand Assessment (moray.gov.uk)
[15] Scheme of Assistance for Home Owners and Private Tenants in Moray (moray.gov.uk)
[16] Moray Council Climate Change Strategy 2020-2030 (moray.gov.uk)

Moray Council Climate Change Plan and Routemap to Net Zero Emissions[17]	Sets specific targets relating to energy efficiency: ● 2023-24: Complete school buildings condition and suitability review. Plans developed to achieve category B or higher in all schools. ● 2024-25: Complete Learning Estate Asset Management plan to identify opportunities for heating and power refurbishment to provide renewable alternative options for buildings, implemented over the next 10 years. ● 2025: All social housing to meet EPC Band C or higher ● 2032: All social housing improved to meet EPC Band B or higher
Moray Hydrogen Strategy[18]	Expresses an anticipation that between 2036-2045, hydrogen could be used for domestic heat alongside natural gas and other energy sources.
Moray Council Open Space Strategy[19]	Provides a strategic vision for the provision, development, maintenance and management of open space within Moray (excluding the Cairngorms National Park).

[17] Moray Council Climate Change Plan and Routemap to Net Zero Emissions (moray.gov.uk)

[18] Moray Hydrogen Strategy (moray.gov.uk)

[19] Moray Council Open Space Strategy (moray.gov.uk)

3.2 Other drivers

In 2019, just over half of all Scottish energy demand was for heating[20]. This was responsible for approximately 20% of all energy related greenhouse gas emissions[21]. Scotland has set a target of 50% of heating energy from renewable sources by 2030[22]. To support this, the Scottish Government has committed:

- £2.8bn of investment over the current parliament (to 2026);

- At least £200m investment in the public sector estate to improve and reduce energy use and install zero emissions heating systems; and

- £479.6m for energy projects in the 2023/24 budget, of which £231.1m is for tackling fuel poverty and improving energy efficiency.

The Scottish Government has indicated that Local Heat and Energy Efficiency Strategies will be a consideration when allocating future funding and designing national funding packages.

Another driver is the ongoing energy crisis. The rising cost of energy is adding pressure to all homes and businesses. Moray's domestic gas and electricity costs alone rose to an estimated £130m/year in 2022/23[23]. Higher fuel costs increase fuel poverty and costs for businesses. Total energy costs (including non-domestic) represent a sizeable proportion of Moray's total GDP which is mostly paid to external companies and so lost from the local economy.

Progressing this strategy can therefore bring potential financial benefits for Moray, and support the just transition to net zero by reducing:

- The financial burden of energy costs for buildings (domestic, business, public sector estate, and others including social enterprises and community organisations);

- 'Loss' to Moray's GDP and increasing local wealth retention as part of Community Wealth Building;

- Energy demand and costs as a driver of fuel poverty;

- Energy demand in the cost of doing business;

- Energy as a driver of the climate emergency in Moray; and

- Energy demand to increase energy resilience.

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[20] Total final energy consumption by sector (2019) – BEIS (Scottish Energy Statistics Hub)

[21] Greenhouse gas emissions by source sector (2019) – Scottish Government (Scottish Energy Statistics Hub)

[22] Scotland's renewable energy targets (gov.scot)

[23] Based on data analysis by Changeworks using PEAT-OR fuel cost data from July 2023.

4. Non-domestic building stock

4.1 Domestic building stock in Moray

Moray has over 47,500 homes[24]. Of these, 68% were built before 1984 which is similar to the national average of 70%[25]. About 6% of homes in Moray are in conservation areas, and 3% are designated as listed buildings[26]. Most homes (70%) are detached, semi-detached, or end-terraced. Only 7% of homes on Moray are flats which is well below the national average of 40%. The pattern of tenure is similar to the national average, with 63% owner occupied, 23% social housing, and 13% private rentals.

Table 6. LHEES priorities and outcomes for Moray.

Tenure

- Owner Occupied
- Privately Rented
- Housing Association
- Local Authority

17%
6%
13%
64%
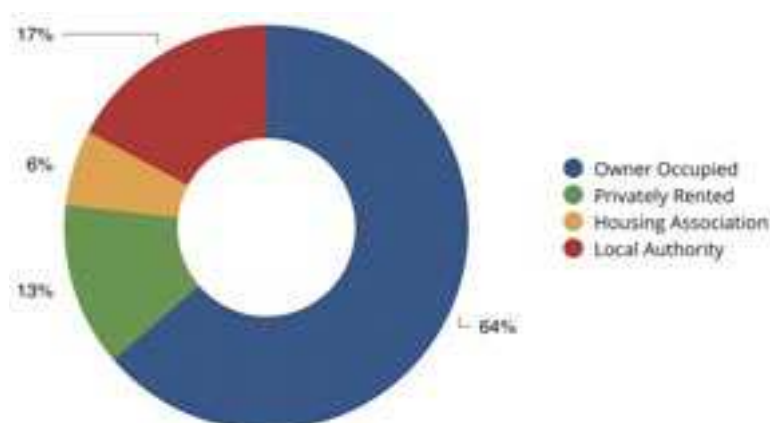
Listed Building and Conservation Status

A	Listed Buildings	0.2%
B	Listed Buildings	1.4%
C	Listed Buildings	1.5%
	Not Listed	96.9%
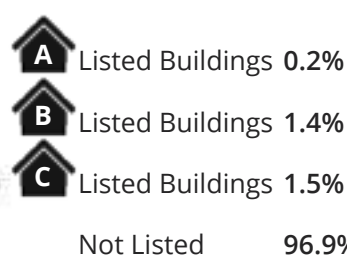
6.4% of homes are in conservation areas

Property Age

- Pre 1919
- 1919 - 1949
- 1950 - 1983
- 1984 - 1991
- 1992 - 2002
- Post 2002

17%
9%
5%
23%
7%
38%
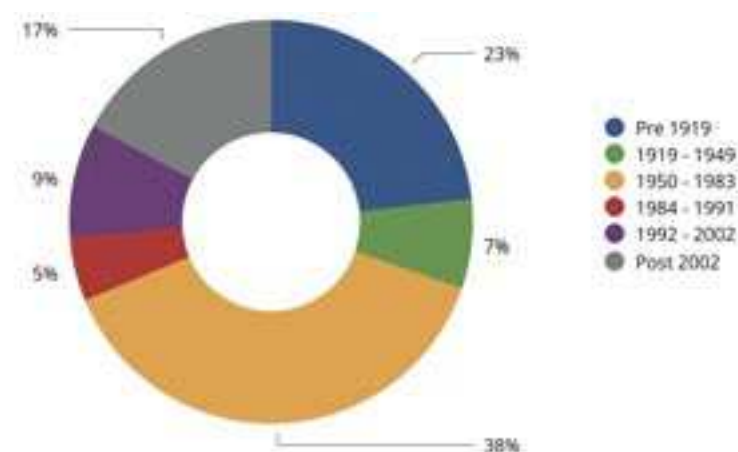
Housing Profile

Detached	**35%**
Semi - detached	**25%**
Mid - terraced	**11%**
End - terraced	**10%**
Small block of flats/dwelling converted into flats	**10%**
Block of flats	**2%**
Large block of flats	**2%**
Flan in mixed use building	**3%**
Other/unknown	**2%**

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[24]   LHEES Domestic Baseline Tool.

[25]   National averages provided by Energy Savings Trust and are taken from Home Analytics v3.8.

[26]   Historic Scotland categorises listed buildings based on their level of importance; Category A is assigned to buildings of national importance, Category B for buildings of regional importance, and Category C for buildings of local importance.

5. Priorities and outcomes

For each priority, outcomes have been identified. Table 6 explores these priorities in detail. These priorities were produced in conjunction with stakeholders. Elected members were provided with a presentation on the draft priorities and an opportunity to provide feedback in March 2024.

Table 6. LHEES priorities and outcomes for Moray.

1.	**Building sustainable and climate resilient communities**	
	1.1 Achieving net zero	Moray buildings move towards net zero and help address the climate emergency.
	1.2 Adaptation	The resilience of Moray's buildings, communities and economy is supported to adapt to the impacts of climate change.
2.	**Maximising knowledge and awareness and ensuring certainty of success**	
	2.1 Maximise knowledge and awareness	Improved knowledge and awareness amongst key stakeholders of the need for change and energy efficiency measures.
	2.2 Ensure certainty of success	Actions will be prioritised on certainty of success and minimal potential unintended consequences.
3.	**A just transition for the energy system**	
	3.1. A just transition	All communities experience a just transition to net zero, with actions only implemented where they are equitable and where the detrimental impacts are minimised.
4.	**Supporting a wellbeing economy, jobs and skills**	
	4.1 Skills and jobs	Skills and jobs required to support retrofit actions across Moray are identified and supported, as part of the just transition.
	4.2 Community wealth building	Actions will continue to support recovery, focus on place, and work in partnership with Moray communities as part of the just transition.
	4.3 Finance	Moray actions are identified where local, regional, and national expenditure or funding could support the just transition.

	5. Improving the energy efficiency of buildings	
	5.1 Domestic properties	Homes across Moray become more energy efficient and work towards national targets, while recognising the challenges this presents.
	5.2 Non-domestic properties	Non-domestic buildings across Moray become more energy efficient, while recognising the challenges this presents.
	5.3 Heritage buildings	Heritage buildings across Moray become more energy efficient, while recognising the unique challenges that this presents.

	6. Tackling fuel poverty and improving health	
	6.1 Reducing energy costs	Energy costs are reduced in fuel poor homes by improving energy efficiency.
	6.2 Improved health outcomes	Physical and mental health outcomes are improved due to adequate heat and ventilation in homes and a reduction in energy bills.

	7. Decarbonising building heat sources	
	7.1 On and off gas grid	Homes across Moray have decarbonised heat sources and work towards national targets, while recognising the challenges this presents.
	7.2 Non-domestic	Non-domestic buildings across Moray have decarbonised heat and work towards national targets, while recognising the challenges this presents.
	7.3 Heat networks	Potential heat network zones are identified as a mechanism to decarbonise heat.

5.1 Priority 1: Building sustainable and climate resilient communities

5.1.1 Outcomes

	1. Building sustainable and climate resilient communities	
	1.1 Achieving net zero	Moray buildings move towards net zero and help address the climate emergency.
	1.2 Adaptation	The resilience of Moray's buildings, communities and economy is supported to adapt to the impacts of climate change.

5.1.2 Context

Our climate is changing faster than ever previously experienced. Scientists agree that greenhouse gas emissions from human activities are the main reason for global temperature increases over the past 150 years[27].

Increased carbon dioxide in our atmosphere also has a profound impact on the health and wellbeing of the population. There is approximately 1 excess death per 4,500 tCO_2e emitted and it is known that the impacts of climate change will be felt disproportionately by people with low income who have contributed least to the increase in greenhouse gas emissions.

Moray Council declared a climate emergency in 2019, and since then progress has been made in reducing emissions and enhancing resilience. However, the pace of these efforts must be amplified both within the council and across the region. Addressing the climate emergency demands a collective effort to curb emissions, enhance sustainability, and adapt to the effects of a changing climate. To achieve this, building owners across Moray must improve the energy efficiency of their assets and transition away from carbon-intensive heating systems.

The transformation of Moray's housing and building stock to net zero will require all stakeholders to work in partnership to deliver meaningful change. Organisations and communities should be encouraged to seek solutions and work together to explore long term solutions for their buildings and neighbourhoods. Collaborative working between business and agencies to further the aims of this strategy will be required.

The targets outlined in the Scottish Government's Heat in Buildings Strategy and EESSH2 align with the overall net zero objectives. Consequently, all actions outlined in the delivery plan will contribute to this priority and assist Moray's buildings in meeting net-zero and other related targets. These actions will

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[27] IPCC (2021) Climate Change 2021: The Physical Science Basis.

consider the implications of a changing climate, such as the increased frequency of extreme weather events. For example, the level and type of insulation may need to be adjusted to ensure that buildings are resilient to the impacts of climate change.

The impact of global temperature increases has already been significant. Weather patterns are changing and sea levels are rising. These changes are leading to severe events such as heatwaves, floods, droughts and wildfires, and increasingly so in the Moray region.

Coastal flooding is of particular concern and impact in Moray due to rising sea levels and storm surges leading to property damage, infrastructure disruption and loss of habitable land.

Climate change also poses the greatest threat to the natural environment and the ecosystem services that it provides. This threat will in turn negatively impact the Moray food and drink sector, tourism sector, and overall health and wellbeing.

Implementation of NPF4 is crucial to delivering necessary climate change adaptation measures through the planning system. There are opportunities for communities across Moray to shape development in their areas through Local Place Plans, and for the new Local Development Plan to integrate adaptation into future spatial planning.

5.1.3 Summary

This priority is about building sustainable and climate resilient communities in Moray. The outcomes of this priority are to achieve net zero and to adapt to the impacts of climate change. The context of this priority is that our climate is changing faster than ever previously experienced and that this is having a profound impact on the health and wellbeing of the population. Moray Council declared a climate emergency in 2019, and since then progress has been made in reducing emissions and enhancing resilience. However, the pace of these efforts must be amplified both within the council and across the region.

5.2 Priority 2: Maximising knowledge and awareness and ensuring certainty of success

5.2.1 Outcomes

	2. Maximising knowledge and awareness and ensuring certainty of success	
2.1	Maximise knowledge and awareness	Improved knowledge and awareness amongst key stakeholders of the need for change and energy efficiency measures.
2.2	Ensure certainty of success	Actions will be prioritised on certainty of success and minimal potential unintended consequences.

5.2.2 Context

The just transition requires all building owners, and stakeholders, to be engaged with and informed on the Local Heat and Energy Efficiency Strategy. This includes its purpose and actions; how to improve building energy efficiency and decarbonise heat sources; and information around the support and funding services available.

Various organisations already exist to provide information and advice. These will be promoted across Moray, as well as any funding opportunities.

Table 7. Relevant information and advice services in Moray.

Business Energy Scotland	Provides support and access to funding to help small and medium-sized enterprises save energy, carbon, and money – including energy efficiency assessments.
Business Gateway	Provides free, impartial advice and guidance to new and existing businesses in Scotland.
Citizens Advice Bureau	Offers free, confidential, and independent advice to people on a wide range of issues, including energy.
Community Energy Scotland	Supports communities to develop their own renewable energy projects.
Energy Saving Trust	Provides independent advice on energy efficiency and renewable energy to householders and businesses.

Home Energy Scotland	Helps people create warmer homes, reduce bills, and lower carbon footprints, delivered via an advice centre network.
Local Energy Scotland	A network of local energy advice services that provide impartial advice on energy efficiency and renewable energy to householders and businesses.
Moray Council	Have webpages dedicated to heating advice, focussing on providing support following the increase in energy bills.
Moray CAN	A community-led action network that works to reduce carbon emissions in Moray.
Net Zero Nation	Scottish Government website providing resources and advice for a range of Net Zero issues including energy efficiency.
REAP	Provide free and impartial energy advice to anyone in Moray, including home visits.
Scarf	Delivers targeted energy efficiency advice and services to households and businesses.
Scotland's National Public Energy Agency	Will provide leadership and coordination to deliver heat decarbonisation, by: ● Accelerating transformational change in how we heat and use energy in buildings; ● Aiding public understanding and awareness; and ● Coordinating delivery of investment.
tsiMORAY	Provide support and networking opportunities for organisations in Moray.
UHI Moray	Performs a leading role in skills development, research, and community engagement. Currently exploring how to develop the green jobs which will be required to deliver this change in heating systems.

There is an ongoing requirement to provide information and support to help consumers make informed choices. However, there are challenges to raising awareness on Local Heat and Energy Efficiency Strategies, energy efficiency, and heat decarbonisation. These include:

- How best to encourage owners to improve their buildings;
- Knowing where to find the correct support;
- The cost of measures and potential disruption from retrofit lead to lack of engagement;
- Disinformation and mixed messaging from people led by ideology rather than science;
- Understanding how EPC bands are calculated, and how best to improve these; and
- The mass behavioural shift needed regarding how homes and buildings are used and heated.

To maximise knowledge and awareness, the Delivery Plan will focus on identifying and addressing gaps in information provision and support services. This will be achieved by integrating the roles and plans of key stakeholders to ensure a comprehensive and coordinated approach.

By aligning work plans and prioritising actions with a high likelihood of success and minimal unintended consequences, Moray can make best use of available resources and achieve short-term successes that will serve as stepping stones towards more ambitious initiatives. In the short term, the focus will be on addressing low regrets measures and building Moray's capacity to tackle larger challenges over time.

5.2.3 Summary

To achieve progress on this priority, all building owners and supporting organisations must be involved in the decarbonisation journey. All stakeholders will be informed about the considerations identified during the development of this strategy and the available national funding and support to ensure the success of retrofits. Actions include developing a communications strategy, materials, and presentations, and engaging with the Scottish Government to encourage a nationally coordinated campaign supporting all stakeholders.

5.3 Priority 3: A just transition for the energy system

5.3.1 Outcomes

	3. A just transition for the energy system	
	3.1. A just transition	All communities experience a just transition to net zero, with actions only implemented where they are equitable and where the detrimental impacts are minimised.

5.3.2 Context

As part of Moray's approach to achieving net zero and tackling the climate emergency, residents and the environment must benefit from this transition in a just manner. This means understanding and tackling socio-economic inequalities that will be created or exacerbated by the transition. A just transition will require Moray being "a resilient, fair, and prosperous place to live and work and puts fairness and social justice at the heart of achieving climate goals".

If we continue with business as usual, existing challenges to Moray communities will get harder, with those least responsible and most vulnerable being impacted the hardest and unable to adapt. Achieving positive socio-economic objectives will be impossible without addressing climate justice. This will aim to prevent disproportionate impacts to marginalized groups and ensuring all residents share in the health, economic, and social benefits of a clean energy economy.

Moray's just transition will see changes to the way existing energy infrastructure is used. This will be driven by the need for grid improvements and additional generation capacity, and by the long-term goal of moving away from natural gas. SSEN, SGN and the Scottish Government will all play a leading role in this effort. SSEN will be responsible for upgrading the electricity grid, SGN will focus on developing alternative fuels suitable for part or all of the gas network, and the Scottish Government will provide national coordination. Moray Council will play a supporting role by providing local context and input to these changes.

Understanding the amount of energy needed and how to minimise it is necessary for future generation planning. This sets a baseline for energy generation to meet demand. However, transitioning to renewable energy sources means that energy may not always be available when and where it is needed, necessitating the development of methods to transport and store it.

5.3.2.1 Electricity

This strategy proposes a substantial increase in decarbonised heating systems powered by electricity, including individual heat pumps and heat pumps connected to heat networks. The substantial number of heat pumps projected to be installed by 2045 will place significant strain on the electricity grid. This will

require careful collaboration with SSEN, as the Distribution Network Operator, to ensure grid limitations are identified and addressed when action planning.

Discussions with SSEN should also explore potential grid expansion opportunities and consider other energy projects competing for capacity. Investigating battery storage options will be crucial for managing the network, as current battery definitions categorise them as grid capacity consumers. However, this definition is expected to change. By collaborating with SSEN, this strategy will support their ability to make informed decisions regarding investments and grid upgrades, based on local context and priorities. This collaborative approach will ensure a robust and reliable electricity grid capable of meeting the demands necessary for a just transition and net zero future.

Meeting the Scottish Government's ambition for decarbonised heat is likely to require national fossil fuel consumption to reduce by 28 TWh in 2030 (based on a 2021 baseline)[28]. Therefore, work to drive heat decarbonisation should begin without delay. This means that in the short term such work will require to progress under current grid constraints or managing minor upgrades where necessary. To achieve this, regular engagement should take place with SSEN to assess the feasibility of short-term actions. The Council will also explore using SSEN's Local Energy Net Zero Accelerator (LENZA) software which is scheduled for release in 2024[29]. This geospatial planning tool empowers planners to make data-driven decisions regarding the placement of new energy assets in local areas. It does so by analysing current cable capacity and assessing the potential impact of additional loads. This enhanced understanding of local energy infrastructure will be crucial for informed place-based decision-making, ensuring that the just transition is implemented in a strategic and sustainable manner.

5.3.2.2 Natural gas

In Moray, most homes rely on natural gas for heating, accounting for approximately 30,850 properties. To achieve and surpass the Heat in Buildings Strategy's goal of zero emissions heating in 1 million on-gas homes by 2030, unabated natural gas usage must be phased out and replaced with low-carbon and renewable energy sources. Two mechanisms can be employed to achieve this transition. These are:

1. **Introducing alternative heating systems**
    Heat pumps offer a promising alternative to natural gas heating in individual buildings. These systems extract heat from the air or ground and use electricity to transfer it to a building's heating system. Heat pumps are highly efficient and can significantly reduce energy consumption.

    Heat networks, which distribute hot water from a central source to multiple buildings, can also play a role in reducing natural gas usage.

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28   Scotland's Heat in Buildings Strategy (2021) (gov.scot)
29   SSEN Local Energy Net Zero Accelerator (LENZA) (ssen.co.uk)

2. Switching natural gas for decarbonised alternatives

Gas blending involves mixing natural gas with hydrogen, reducing the overall carbon content of the fuel. Hydrogen, produced using renewable energy sources, can be a clean and sustainable alternative to natural gas.

Whilst the Scottish Government does not anticipate hydrogen playing a role in heating buildings in the immediate future[30], shifting to 100% hydrogen gas for heating holds immense potential as a long-term decarbonisation solution, contingent on the success of ongoing trials. SGN is at the forefront of exploring alternatives, collaborating closely with other gas networks to gather evidence for the UK's 2026 heat policy decision regarding hydrogen's future role in residential heating.

The long-term potential of hydrogen in building heating should be thoroughly evaluated, considering opportunities and timelines. The Council should continue to discuss with SGN the opportunity of hydrogen to have a role in building heating as enhanced understanding could facilitate its integration into strategic planning. This knowledge will smooth the transition and inform the optimal timing for a hydrogen shift, should it be deemed suitable. Additionally, decisions must be made regarding the suitability of hydrogen compared to heat pumps and networks. Modelling should also account for potential decommissioning costs of gas network sections. Progress on this is the principally the responsibility of government and the gas distribution networks, with the Council providing support through this strategy and the provision of local knowledge.

5.3.3 Summary

This priority examines how this strategy and the just transition to decarbonised heat will interact with the broader energy system. It specifically considers the use of existing electricity infrastructure, the impact on future grid capacity, and the transition from natural gas to other fuels. SSEN and SGN are key stakeholders in leading this transition and will be involved throughout the strategy's lifetime to monitor their progress. To help achieve this priority, actions focus on supporting SSEN and SGN through:

● Collaborating with SSEN and using the LENZA tool to plan heat decarbonisation measures for buildings and guarantee that Moray's energy system requirements for heat decarbonisation are met; and

● Working with SGN to investigate the potential of hydrogen for heating buildings in Moray.

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[30] Scotland's draft Energy Strategy and Just Transition Plan (gov.scot)

5.4 Priority 4: Supporting a wellbeing economy, jobs and skills

5.4.1 Outcomes

4. Supporting a wellbeing economy, jobs and skills		
4.1 Skills and jobs	Skills and jobs required to support retrofit actions across Moray are identified and supported, as part of the just transition.	
4.2 Community wealth building	Actions will continue to support recovery, focus on place, and work in partnership with Moray communities as part of the just transition.	
4.3 Finance	Moray actions are identified where local, regional, and national expenditure or funding could support the just transition.	

5.4.2 Context
5.4.2.1 Skills and jobs

Enhancing energy efficiency and decarbonising heat sources can generate substantial economic benefits for businesses. These advantages include strengthening supply chains, fostering job creation, facilitating the adoption of innovative technologies, and supporting the emergence of new industry entrants. To achieve the goals of a just energy transition, supply chains must expand, particularly requiring a surge in skilled heating and energy efficiency installers.

Table 8. National economic opportunities and challenges from Scotland's Heat in Buildings Strategy.

Opportunities	Challenges
Heat and energy efficiency sectors generate turnover of £2bn/year and support around 12,500 FTE jobs.	Construction sector and supply chains are still recovering from COVID-19 and the UK's exit from the European Union.
An additional 16,400 jobs will be supported by 2030 due to investment in decarbonised heating deployment.	There is a skills gap to meet existing demand, with demand expected to grow.
Total investment to meet net zero targets for buildings is around £33bn, with investment set to peak at up to £2.5bn/year.	Requirement to understand supply chain demand to ensure availability of skilled labour will not increase prices and throttle ambitions.
Opportunities for Scottish companies to service demand across the UK alongside internal demand.	Consider just transition for jobs in traditional, fossil-fuel based sectors.
Maximise benefits for Scottish manufacturers (investment and access to a skilled workforce).	Materials shortages and increased prices.

In Moray, additional challenges currently being experienced include:

- **Lack of understanding of the whole-building approach:** Heat pump installation requires a comprehensive understanding of a building's thermal performance, including ventilation, air tightness, and potential condensation issues.

- **Inadequate insulation sector qualifications:** Many individuals working in the insulation industry may only hold manufacturer-specific qualifications, which may not provide them with the necessary knowledge for comprehensive heat pump installations. In addition, the Scottish Government do not deem these to be competent qualifications.

- **Insufficient understanding of local skill gaps:** There is a need for a clearer picture of the current skill level and the training needs across Scotland to effectively address the local skills shortage. A study is currently underway, led by researchers at UHI Moray, to report on green skills requirements across the region.

- **Potential workload increase due to delays:** Delayed heat pump installations could lead to a backlog of work in the future, further straining the already limited pool of qualified installers.

Retrofitting a significant number of homes annually necessitates a substantial skilled workforce. The more complex and extensive the retrofitting measures per dwelling, the greater the number of homes that need to be retrofitted each year to achieve the targets, consequently increasing job demand. This issue will intensify with each passing year that targets are not met. Skills and jobs required to support this include:

- Insulation installation;
- Emerging innovative technologies;
- Heat pump installation/maintenance;
- Funding;
- Heat network construction/operation;
- Retrofit co-ordination;
- Smart energy;
- Carbon management;
- Traditional skills for heritage buildings;
- Data and digital; and
- Supporting roles (e.g. welders, scaffolders).

5.4.2.2 Community wealth building

Community wealth building is a strategic approach that uses the economic influence of established local organisations, such as local authorities, healthcare providers, universities, colleges, housing associations, and major private sector employers, to address persistent systemic issues and structural inequalities within communities. It aims to reshape local and regional economic systems, empowering more communities and individuals to participate in, own, and benefit from the wealth generated within their economies. It can foster job creation, business growth, community asset ownership, and shorter supply chains, leading to enhanced resilience and alignment with net zero objectives[31].

This strategy will aim to support local supply chain opportunities as part of community wealth building and procurement by strategically identifying and prioritising areas for retrofit delivery. This approach will inform Moray businesses of potential opportunities and so allow them to maintain their competitiveness and contribute to the region's economic vitality.

5.4.2.3 Finance

As noted in Table 8, total investment required to meet net zero targets for buildings in Scotland is around £33 billion, with annual investment peaking around £2.5 billion by 2030. Moray has over 49,000 buildings, the majority of which will need to be retrofitted – necessitating significant levels of investment. It is estimated that the total cost of measures to fully retrofit domestic properties in Moray will be £955m, or approximately £22k per home. Whilst this presents a funding challenge, it is also a substantial economic opportunity for businesses in Moray.

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[31]   Community Wealth Building – Cities and Regions Policy (gov.scot)

5.5 Priority 5: Improving the energy efficiency of buildings
5.5.1 Outcomes

	5. Improving the energy efficiency of buildings
5.1 Domestic properties	Homes across Moray become more energy efficient and work towards national targets, while recognising the challenges this presents.
5.2 Non-domestic properties	Non-domestic buildings across Moray become more energy efficient, while recognising the challenges this presents.
5.3 Heritage buildings	Heritage buildings across Moray become more energy efficient, while recognising the unique challenges that this presents.

5.5.2 Context

Enhancing the energy efficiency of buildings will not only lower energy consumption but also allow the successful implementation of decarbonised heating systems. By reducing energy demand, this will help reduce fuel costs and contribute to alleviating fuel poverty and achieving net-zero emissions. Therefore, a fabric-first approach is a cornerstone of the Heat in Buildings Strategy.

5.5.2.1 Domestic properties

The Heat in Buildings Strategy and EESSH2 have targets on building energy efficiency as shown in Table 9.

Table 9. Relationship between Heat in Buildings Strategy and EESSH2 targets and progress in Moray.

Private rented homes to be EPC C by 2028	All social housing to be EPC B by 2032	All other homes to be EPC C by 2033
Currently 4,600 private rented homes in Moray not in EPC C	9,500 social homes in Moray not currently in EPC B	Currently 22,600 other homes in Moray not in EPC C

The energy efficiency challenge in Moray is substantial - only 5% of homes have an EPC band of A or B. 81% of Moray homes have an EPC band lower than C which is considerably higher than the national average of 51%.

The 2040 target of all fuel poor homes to be EPC B or above poses a significant challenge as it is difficult to pinpoint fuel poverty risk years in advance, and any household could potentially experience fuel poverty due to unforeseen changes in living circumstances. This strategy therefore applies the target to all homes.

Along with EPC bands, analysis identified other indicators for poor energy efficiency. This includes 5% of homes with single glazed windows; 13% with <100mm of loft insulation; and 54% with uninsulated walls.

5.5.2.2 Non-domestic properties

It is important to note that non-domestic data is less accurate than domestic data. Therefore, while the goal is to enhance the energy efficiency of all non-domestic buildings across Moray, the immediate focus will be on buildings where more reliable data is available, including Moray Council buildings and properties owned by key partners such as the NHS.

5.5.2.3 Heritage buildings

Heritage buildings, particularly those within Conservation Areas or with Listed Status, often present unique challenges in terms of energy efficiency and decarbonisation efforts. While these structures hold significant historical and cultural value, their distinctive architectural features and materials can hinder the implementation of standard retrofitting measures commonly applied to other buildings.

The preservation of heritage buildings demands a balance between enhancing energy efficiency and maintaining their architectural character. Altering original features or introducing modern elements that are aesthetically incompatible with the building's heritage can diminish its historical significance.

The Council has issued guidance for repair or replacement works to historic buildings within Moray, and this includes energy efficiency measures[32]. A grant scheme is already run by the Council for the replacement of windows in eligible properties[33]. The Council will continue to publicise these measures and identify and promote opportunities where further support can be provided.

[32] Replacement Windows & Doors Guidance (moray.gov.uk)
[33] Moray Council Window Grant Scheme Fund (moray.gov.uk)

5.5.2.4 Challenges

There are building-specific challenges that will need to be addressed at a project level, such as:

- Minimising disruption to building/services whilst works are carried out;
- The need to carry out repair work before retrofitting;
- Restrictions such as Conservation Areas and Listed Status; and
- Difficulties in financing energy efficiency measures.

5.5.2.5 Existing funding mechanisms for Local Authorities

A variety of funding is available to support Moray Council in undertaking and/or financing retrofits. In the short term, existing energy efficiency programmes supported by Moray Council will continue to deliver energy efficiency and fuel poverty reduction work. This strategy will prioritise existing projects and seek to provide justification for future potential projects where this funding can be most effectively used.

Table 10. Retrofit funding examples available for Moray Council.

Scottish Government Area Based Schemes (ABS)[34]	Awarded for energy efficiency programmes in high fuel poverty areas. This funding is blended with owners' contributions and funding from Registered Social Landlords who may choose to insulate their homes at the same time.
Energy Company Obligation (ECO) Help to Heat Scheme - Local Authority Flexibility[35]	Used by energy suppliers to meet up to 25% of their ECO Affordable Warmth obligation by installing energy saving measures in properties declared eligible by local authorities. Local authorities are responsible for ensuring households are in private tenure and either living in fuel poverty or have a low income and vulnerable to living in the cold.
HACT Retrofit Credits[36]	A carbon credits scheme that unlocks additional funding into retrofit projects by verifying the emission reductions and social value of retrofit projects.
Scottish Central Government Energy Efficiency Grant Scheme[37]	Capital grant funding support to enable the delivery of heat decarbonisation and energy efficiency projects across public buildings.

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[34] Scottish Government Area Based Schemes (gov.scot)

[35] Energy Company Obligation (ECO) Help to Heat Scheme (gov.uk)

[36] HACT – Retrofit Credits (hact.org.uk)

[37] Scottish Central Government Energy Efficiency Grant scheme (gov.scot)

In addition, other funds and support are available directly for domestic and non-domestic properties including Warmer Homes Scotland[38]; Home Energy Scotland Grant and Loan[39] and Private Rented Sector Landlord Loan[40]; and Business Energy Scotland SME Loan Scheme[41]. All of these schemes are promoted across Moray and this will continue as a cornerstone of this strategy.

5.5.3 Summary

This priority focuses on improving energy efficiency of Moray's buildings to meet national targets, support decarbonisation, and help building owners to lower energy costs. To achieve this, short, medium and long term building level actions will be identified and prioritised. To ensure quality, building level actions have only been included where there is a high certainty of success and positive impacts or are already planned for implementation:

- Building level studies to understand specific energy efficiency measures required;

- Planned projects improving energy efficiency such as installation of wall insulation, floor and loft insulation, double/triple glazing, insulating pipes, and draught proofing;

- Ongoing analysis and modelling to identify further high certainty building level actions;

- Promotion of funding and support for energy efficiency measures; and

- Raising awareness and knowledge of energy efficiency.

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[38] Warmer Homes Scotland funding (homeenergyscotland.org)
[39] Home Energy Scotland Grant and Loan funding (homeenergyscotland.org)
[40] Private Rented Sector Landlord Loan funding (homenergyscotland.org)
[41] Business Energy Scotland SME Loan funding (businessenergyscotland.org)

5.6 Priority 6: Tackling fuel poverty and improving health

5.6.1 Outcomes

	6. Tackling fuel poverty and improving health	
	6.1 Reducing energy costs	Homes across Moray become more energy efficient and work towards national targets, while recognising the challenges this presents.
	6.2 Improved health outcomes	Non-domestic buildings across Moray become more energy efficient, while recognising the challenges this presents.

6.1 Reducing energy costs

Energy costs are reduced in fuel poor homes by improving energy efficiency.

6.2 Improved health outcomes

Physical and mental health outcomes are improved due to adequate heat and ventilation in homes and a reduction in energy bills.

5.6.2 Context

Fuel poverty is when total household fuel costs are more than 10% of adjusted net income; and if after deducting fuel and care costs, the remaining net income does not allow for an acceptable standard of living. For extreme fuel poverty, more than 20% of net income is needed. This priority focuses on reducing and preventing fuel poverty in Moray via energy efficiency and heat decarbonisation measures. Poverty increased in Moray pre-pandemic and it is expected to have increased further due to rising fuel costs and the cost-of-living crisis.

Fuel poverty is a significant issue in Moray, with over 31% of households experiencing it, exceeding the national average. This situation is even more concerning for 18% of Moray households, who face extreme fuel poverty, also surpassing the national average[42]. Off-gas homes are particularly vulnerable to both fuel poverty and extreme fuel poverty as electricity and oil heating can be more expensive than gas. Research has identified specific groups that are at an increased risk of fuel poverty, as outlined in Table 11.

Table 11. Groups most likely to experience fuel poverty.

Young & middle-age groups	Females	Single marital status	Couples with 2+ children/ lone parents	People with disabilities
Ethnic minority communities	People with the lowest net income	Social housing and private rented sector	Rural areas	People relying on electric heating

[42]   Scottish House Condition Survey 2017-19 (gov.scot)

The energy efficiency of buildings plays a critical role in fuel poverty. National guidelines emphasise the need to identify areas where poor building energy efficiency contributes to fuel poverty within the strategy and delivery plan. However, the representation of this factor in the key domestic dataset is inconsistent, with energy efficiency measures not adequately weighted against fuel poverty. This, coupled with uncertainties regarding the combination of measures and potential heat pump inefficiencies caused by poor insulation, makes it challenging to identify building-level actions that will not exacerbate fuel poverty. This strategy therefore aligns with the Tackling Child Poverty Delivery Plan commitment to only take forward actions where they will not worsen fuel poverty rates[43]. Therefore, the immediate priority will be to continue area-based schemes as set out in Section 4.5 whilst collecting more accurate data to decide if schemes focussed on building types would be feasible and if so, what would be more efficient.

For health, a significant concern for this strategy is indoor air quality. This is influenced by several factors which make estimates of health impacts challenging. The Cleaner Air for Scotland 2 Strategy states a "need for policy integration and coherence to avoid the risks of unintended consequences." It notes non-health-related developments (e.g. energy efficiency measures) could have unexpected adverse health impacts if a wider perspective is not taken. Poor insulation installation may cause damp and mould, worsening indoor air quality, leading to negative health and wellbeing impacts. The Council will continue to engage with Scottish Government and other partners to ensure indoor air quality is researched further and considered in the context of Local Heat and Energy Efficiency Strategies.

5.6.3 Summary

Fuel poverty is a pressing issue in Moray, and improving energy efficiency is a key mechanism to tackle it. By enhancing energy efficiency, energy costs can be reduced, alleviating the financial burden on households. Proper implementation of energy efficiency measures can lead to positive physical and mental health outcomes. However, it is crucial that any measures implemented do not inadvertently worsen fuel poverty. At present, area-based interventions are deemed to be the most appropriate for an area like Moray due to our range and distribution of different building types. Further monitoring and research into indoor air quality will better inform future iterations of the strategy. Adopting a considered building-level approach will ensure that no one is left behind.

[43]   Best Start, Bright Futures: Tackling Child Poverty Delivery Plan 2022-26 (gov.scot)

5.7 Priority 7: Decarbonising building heat sources

5.7.1 Outcomes

7. Decarbonising building heat sources	
7.1 On and off gas grid	Homes across Moray have decarbonised heat sources and work towards national targets, while recognising the challenges this presents.
7.2 Non-domestic	Non-domestic buildings across Moray have decarbonised heat and work towards national targets, while recognising the challenges this presents.
7.3 Heat networks	Potential heat network zones are identified as a mechanism to decarbonise heat.

5.7.2 Context

Decarbonised heat sources are low and zero emissions heating. They include heat pumps, heat networks, infra-red heating or electric heaters combined with solar PV; solar water heating; and thermal storage. Implementation of new heating systems will help reduce emissions and help Moray to achieve net zero and tackle the climate emergency.

Identification of 'strategic zones' for moving forward these measures, as suggested by the LHEES methodology, does not work for Moray. In Moray, building architypes are numerous and scattered, requiring a case-by-case approach to decarbonisation. Dividing work by on/off gas grid status, prioritising off gas properties first, is a better approach to suit local circumstances.

5.7.2.1 Domestic building stock

The Heat in Buildings Strategy outlines that there are low and zero-emission heating options available for all homes. It sets ambitious targets to achieve zero-emission heating by 2030. This includes 170,000 off-gas homes that currently rely on high-emission fuels, with approximately 12,720 of these homes located in Moray. Additionally, the strategy aims to transition 1 million on-gas homes to zero-emission heating, including approximately 30,850 homes in Moray.

To achieve the targets set out by the Heat in Buildings Strategy, it is crucial to accelerate the decarbonisation of heating systems. This strategy prioritises the implementation of proven and cost-effective measures that minimise potential regrets. In Moray, where 71% of properties are connected to the gas grid compared to the national average of 80%, a no/low regrets approach is adopted. This entails implementing heat decarbonisation measures for domestic properties only where there is a high likelihood of success (Chapter 4.2).

The national methodology classifies properties into four categories based on their suitability for heat pump adoption. Most on-gas homes in Moray fall into the moderately suitable category, indicating that they can be effectively decarbonised using heat pumps. Homes that are less suitable for heat pumps may require additional upgrades or alternative low-carbon heating solutions. Amongst off-gas properties, just over half are immediately suitable for heat pumps or require minor improvements[44].

5.7.2.2 Non-domestic building stock

Although decarbonised heating systems could be suitable for a considerable portion of the non-domestic building stock, enabling works, including distribution system upgrades and increased site electricity capacity, may often be required.

The Heat in Buildings Strategy sets a target for zero emissions heating in 50,000 non-domestic building by 2030: This would equal approximately 2,125 in Moray of which around 1,190 are on mains gas. Unlike domestic, most non-domestic properties in Moray have electric heating; with only 21% on mains gas and 14% on oil heating. This is similar to the national trend whereby over half of all non-domestic properties are already heated using low or zero emissions sources.

While there are ambitious Scottish targets for decarbonisation of heating for local authority owned non-domestic buildings by 2038, there are serious concerns about the levels of funding required to meet this target. Clarity over the amount and timing of any support is essential to create meaningful long-term decarbonisation plans for public sector non-domestic buildings.

As stated in section 4.5.2.2, it is important to note that non-domestic data is less accurate than domestic data. Therefore, while the ultimate goal is to ensure that all non-domestic buildings across Moray are fitted with decarbonised heating systems, the immediate focus will be on buildings where more reliable data is available, including Moray Council buildings and properties owned by key partners such as the NHS.

5.7.2.3 Existing district heat networks

Moray is home to five[45] existing heat networks, which provide a sustainable and affordable source of heat to a variety of buildings, including residential properties and businesses (Table 1). The potential to expand these, including options of switching to decarbonised heat sources, will be explored during the delivery stage of this strategy.

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[44] Changeworks LHEES data analysis for Moray.

[45] Heat network analysis conducted by Changeworks only considered semi-public & public buildings. Therefore, there may be more than five heat networks in Moray which are presently unrecorded.

Heat network	Description
Roseisle Maltings	Bioplant maltings and distillery, heat piped to maltings at Burghead.
Findhorn Foundation Biomass District Heating System	Operational biomass district heating system with 13 connections. Extension under development.
West Whins Affordable Housing	Air Source Heat Pump district heating system with 6 connections.
Edgehill Forres	Operational biomass district heating system with 7 connections.
Dairy Cottage, Keith	Operational biomass district heating system with 4 connections.

5.7.2.4 Potential district heat network zones

There is significant potential to develop further heat networks in Moray. A number of locations in Moray have been identified as being potentially suitable for new heat networks, including Buckie, Burghead, Elgin, Forres, Keith and Lossiemouth.

To assist in the prioritisation of the heat network zones they have been divided into three categories:

- **Category 1:** Identifies areas with the highest potential for economically viable heat networks at present. This is determined using the national methodology that considers factors such as linear heat density, buffer radii, and the number of anchor loads. This represents the highest priority of zone for future progression.

- **Category 2:** Taking a broader approach by considering a wider range of factors such as heat sources, social housing, and strategic sites, to prioritise areas for heat networks that are not solely based on economic viability. This represents zones which will be more difficult to develop at present but may be suitable for development in the future.

- **Category 3:** Settlement-level zones which can be used for longer-term planning. It considers all the factors in Categories 1 and 2, as well as other factors that may be relevant to the specific settlement. This represents zones which will be difficult to develop but may be suitable for further consideration in the future.

5.7.2.5 Category 1: Areas with the highest potential

A summary of the potential heat networks zones in Moray identified through the heat network mapping process is shown in Table 12. This identifies three areas in Elgin which contain suitable anchor loads and public buildings with sufficient heat demand near each other.

Table 12. Potential heat networks identified in Moray.

Zone ID	Category	Annual heat demand (MWh/yr)	Number of anchor loads
Elgin 1	1	7,503	2
Elgin 2	1	18,836	2
Elgin 3	1	7,442	2

Figure 2. Locations of Category 1 potential heat networks in Elgin.
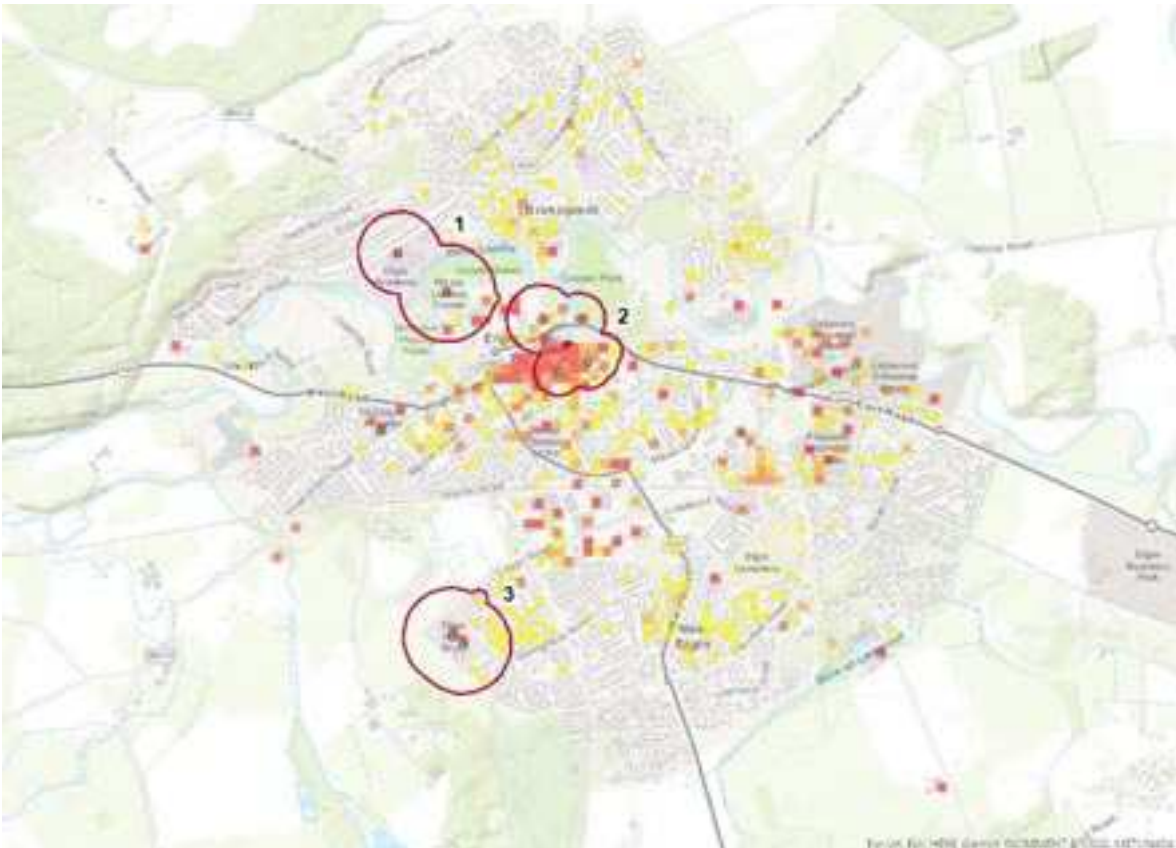
Elgin 1 includes the Moray Leisure Centre (MLC) and Elgin Academy. Being a substantial consumer of heat, the MLC is currently pursuing potential retrofitting and enlargement. This opportune timing could prove beneficial for incorporating the MLC into a heat network. While Elgin Academy is situated near the MLC, the River Lossie might pose challenges or raise the expense of connecting the two buildings.

Elgin 2 includes buildings such as Elgin Town Hall, Elgin Library, Moray Council HQ and Moray Growth Deal projects in South Street. There are also other public buildings nearby such as Elgin Sheriff Court, UHI Moray campus and Dr Gray's Hospital. Therefore, a larger heat network in the centre of Elgin may be economically feasible with the opportunity to link to the MLC rather than having two distinct networks. There is also the opportunity to engage industrial facilities around the centre of Elgin which may have surplus heat to supply to the network.

Elgin 3 includes Elgin High School. This would involve linking the school and neighbouring buildings in a heat network. This network would be more difficult to develop than **Elgin 2** as there are fewer public buildings to act as anchor loads.

Although missing from the data, the Linkwood area to the southeast of Elgin may also be suitable for a heat network. This area includes Linkwood Primary School, Moray Sports Centre and Linkwood Distillery in relatively close proximity. There might be opportunities to use waste heat from the distillery as part of a heat network in this area or connect it to **Elgin 2**, the heat network identified in the town centre.

In terms of advancing these three potential projects, the immediate focus will be on investigating the viability of an expanded **Elgin 2** option. The timing of the Moray Growth Deal interventions at Elgin Town Hall, Elgin Library, and South Street presents an opportune moment to include these within the heat network. The Council has been successful in receiving support from the Scottish Government's Heat Network Support Unit for a feasibility study looking at this and potentially including more buildings into the network. This will be progressed in financial year 2024/25 when the funding is released.

5.7.2.6 Category 2: Areas with a wider range of factors

The towns of Buckie, Forres, and Keith lack the scale of public sector anchor loads that would suggest the financial viability of a heat network. Additionally, these locations present other limiting factors that require careful consideration.

Figure 3. Location of Category 2 potential heat networks in Buckie.

Buckie has a potential heat network zone around the primary and secondary schools. However, as there is a possibility for retrofitting or improvements to these buildings that have not been finalised, it is practical to wait until these plans are in a more advanced stage and then investigate the feasibility of a heat network in the area.

Figure 4. Heat demand map of Forres.
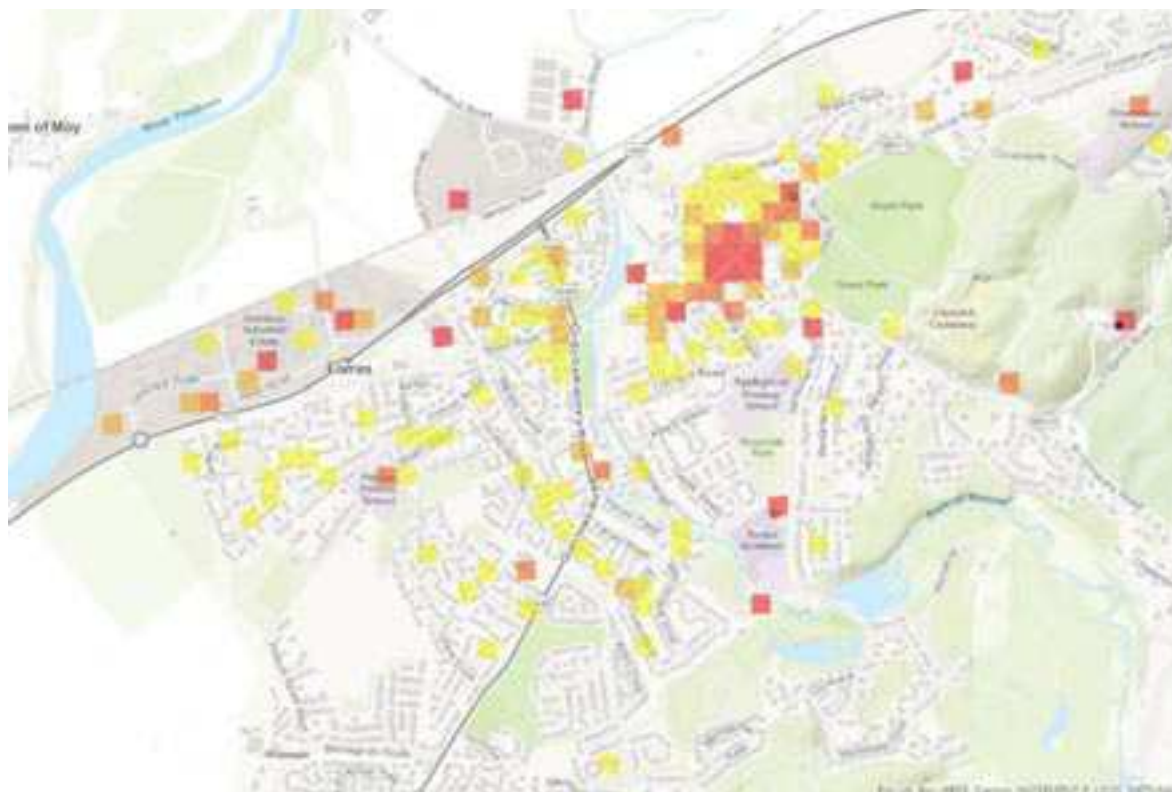
Forres' situation regarding possible heat network provision resembles that of Buckie. While there are various public buildings in the area, those with the highest heat demand are the schools. There are developing plans for a new Forres Academy, yet the location remains undecided at present. There could be potential for heat networks surrounding a new Forres Academy, which should be explored as part of the design of the new school. Due to the relatively substantial heat demand from businesses and public buildings in the Forres town centre, there is interest from the community in a heat network there. The feasibility of this is currently being investigated by the community.

While Keith does not have a significant concentration of public buildings with high heat demand, it has the potential to connect excess heat generated by distilleries to a heat network. While this approach may not be as commercially viable as other options, it warrants further exploration. The Keith Grammar School and the nearby swimming pool could contribute substantially to the heat demand of the network. Consideration should also be given to the potential relocation of industries like data storage centres to Keith, assuming the region's electricity infrastructure is upgraded due to the reinforcement of the grid and its connection to offshore wind energy projects.

Figure 5. Heat demand map of Keith.
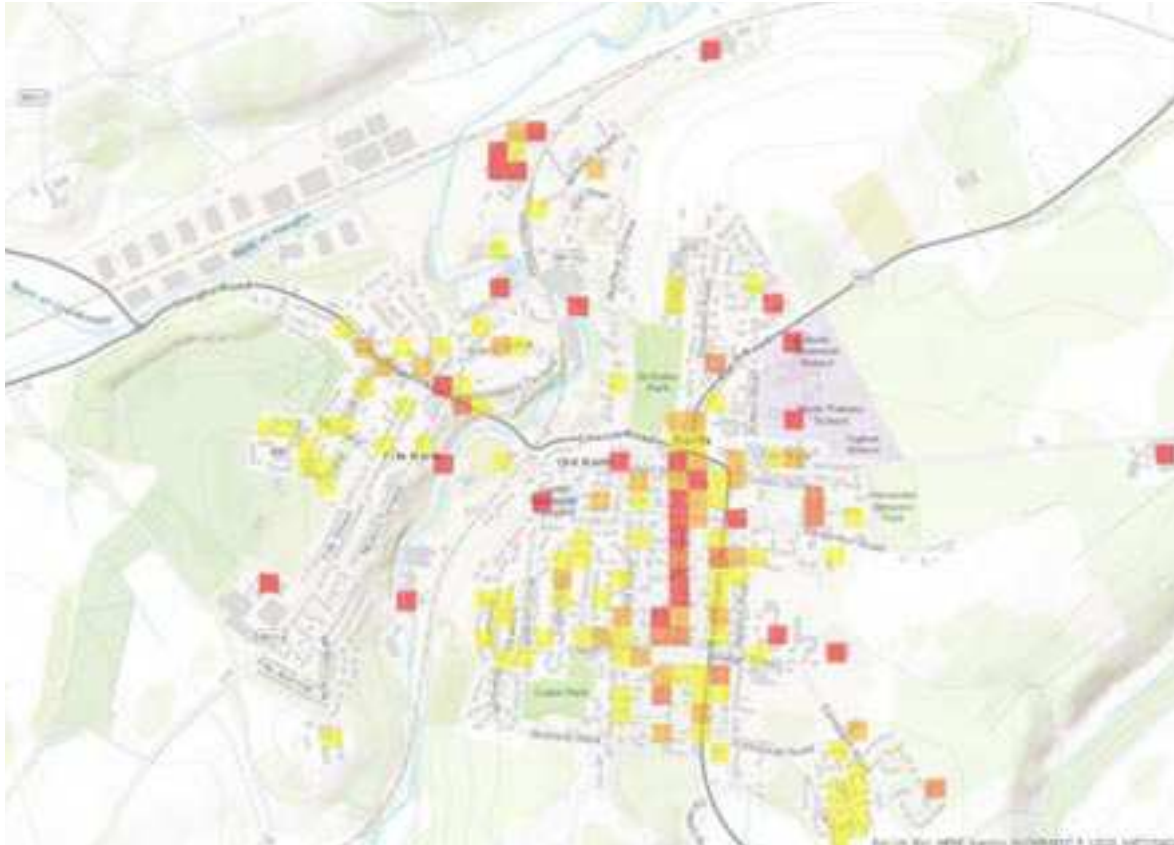
For the purposes of strategic planning and development, these Category 2 sites will remain under review with their potential heat network status reassessed on a regular basis. If these areas are designated as potential Heat Network Zones, developers with planning applications in these areas will be required to outline anchor load status and/or capability to connect with a heat network. This will help to ensure that new developments are designed in a way that is compatible with future heat networks.

5.7.2.7 Category 3: Areas for further investigation as heat networks

Some sites were identified as having relatively high heat demand, though there were insufficient anchor loads to include them within the potential heat network zones at present. These areas include Burghead and Lossiemouth.

It is important to note that these sites may become potential heat network zones in the future. Further feasibility work could be undertaken to assess the potential for heat networks in these areas, considering factors such as the density of heat demand, the availability of renewable heat sources, and the potential for new anchor loads to be developed.

The establishment of an anchor load in one of these areas could make it feasible to create a heat network in these areas. For example, if a new public building is built in an area with high heat demand, this could make it possible to build a heat network that would also serve the surrounding homes and businesses. Similarly, if a waste heat recovery scheme is developed in an industrial area, this could be used to provide heat for a nearby heat network.

Figure 6. Heat demand map of Burghead.

Figure 7. Heat demand map of Lossiemouth.

5.7.3 Summary

This priority aims to decarbonise heating systems across Moray and achieve net zero emissions from heating by 2045. Most Moray properties are connected to the gas grid, but to achieve the level of decarbonisation required, this strategy takes a no/low regrets approach to prioritising actions. This involves having heat decarbonisation actions for domestic properties only where there is a high certainty of success. There is potential to develop further heat networks in Moray. Several areas in the region have been identified as being potentially suitable for new heat networks, including Buckie, Elgin, Forres, and Keith. However, most domestic properties in Moray will not be in areas suitable for heat networks so individual heating solutions such as heat pumps will be the most suitable solution for these.

6. Opportunities and challenges

6.1 Technology opportunities

Several technologies and measures exist which can help to reduce energy consumption and decarbonise heat in buildings (Table 13).

Table 13. Technological opportunities applicable to Moray.

Insulation	Heat networks	Air and ground source heat pumps
All types of insulation reduce heat and energy loss: ● Cavity wall and solid wall; ● Floor, roof and loft; ● Draught proofing; ● Double and triple glazing; ● Energy efficient doors; and ● Tanks, pipes, and radiators.	Bioplant maltings and Supplies heat (or cooling) to buildings by taking excess heat from a central source. Supplying multiple buildings removes the need for individual boilers or heaters. Sources of excess heat include combined heat & power plants, industrial operations, wastewater treatment works, mine water, landfill sites.	Transfers heat from air, ground or water outside of a building to radiators, underfloor heating and hot water cylinders. Heat is absorbed into a thermal transfer fluid, passed through a heat exchanger into the pump. This raises the temperature of the fluid and transfers heat to water.
New energy sources	**Energy storage**	**Other**
Expanding existing electricity supply to meet demand. Exploring new energy options such as hydrogen..	It is expected that due to the energy transition, the price of energy storage will increase. Thermal storage for buildings ensures efficient operation of zero emission heating systems. It usually consists of hot water storage tanks or compact heat batteries. Thermal storage may also support heat networks.	Other decarbonised heat sources include infra-red/electric heaters combined with solar photovoltaic panels; and solar water heating..

6.2   Other opportunities

6.2.1 Just Transition

Local Heat and Energy Efficiency Strategies focus on decarbonising heat in buildings and improving energy efficiency. However, it is important to consider the broader context of the energy transition when developing and implementing the strategy.

The transition to a new energy system presents an economic opportunity, as energy prices are a major factor in the cost of doing business. A just energy transition will create significant supply chain opportunities which will require new jobs, skills, and knowledge transfer. This could have substantial benefits for Moray, for example:

- If, on average, two measures are undertaken by all homes below EPC B, this would equal approximately 5,300 interventions per year in Moray from now to 2040.

- The opportunity for internalising even 10% of Moray's energy spend could equal an additional £9.5m per year[46] circulating the Moray economy, building community wealth.

- For every 1% reduction in energy demand through energy efficiency measures, Moray's energy cost would reduce by ~£1m per year.

As part of this opportunity, by collaborating with neighbouring local authorities on common areas of interest, the Council and relevant stakeholders can optimise the use of limited resources and achieve mutually beneficial outcomes for the entire north of Scotland.

6.2.2 Wider energy planning

This strategy acknowledges that energy is not limited by council boundaries or property ownership. There is a need to balance the use of energy for heating with other priorities, such as wider regional plans, local industrial uses and electric vehicle charging.

It will therefore provide direction and help inform wider energy planning with stakeholders and through the development of Moray's Local Development Plan (LDP) 2027. This LHEES will provide material considerations for the LDP to identify local policy priorities and heat network zones.

To leverage commercial investment in the just transition, wider energy planning is essential. Ensuring that this strategy and delivery plan feed into this wider planning will help further this aim.

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[46]   Based on total final energy consumption for Moray (2019) and an average price per kWh of 27.4 pence (gov.uk)

6.2.3 Stakeholder connections

This strategy and future iterations will cover all buildings in Moray. It is critical that all building owners are brought along as part of a just transition. To ensure ongoing success and development, as this LHEES evolves it will be necessary to continually engage and understand stakeholder needs and wants and ensure these are included in future iterations of the strategy. An engagement plan has been created by Changeworks and is included in the delivery plan.

New partnerships will be forged to move forward projects in line with the strategy's vision. Due to the variety of building stock and geographical challenges across Moray, investment and innovative technologies will be required to help meet deliver projects and associated targets.

6.3   Challenges

Several challenges must be addressed to ensure the success of this strategy and delivery plan. Short-term actions will focus on collaborative solutions to the challenges:

- Uncertainty of measures: using proven technologies as the basis for heat decarbonisation;

- Energy performance certificates: acknowledging data limitations and ensuring certificates are up to date;

- Skills and knowledge: understanding concerns and providing information and assistance, identifying skills shortages and taking action to address these; and

- Ongoing funding and delivery: working with stakeholders, government and the private sector to identify appropriate funding and delivery mechanisms.

Some of these challenges make it difficult to achieve robust delivery or have undesired short- and long-term impacts, potentially damaging confidence in the strategy and early actions. Potential impacts, if not addressed, include:

- Higher energy costs;

- Increasing or not reducing fuel poverty;

- Damp/mould; and

- Interstitial (inter-wall) condensation leading to internal degradation.

To address the uncertainty of measures, only those measures with a high likelihood of success and positive impacts will be pursued. A focus will be placed on research and analysis to identify high-certainty building-level measures. Additionally, the Council will raise nationally significant challenges to the Scottish Government to facilitate a coordinated response and action.

7. Governance, reporting and monitoring

7.1 Governance

TThis strategy provides a framework for future capital and revenue work to guide Moray's buildings towards achieving net zero targets. LHEES focusses on enhancing energy efficiency and decarbonising heat sources, detailing specific projects to be implemented, monitoring progress, identifying gaps and challenges, and outlining potential solutions.

It has been developed to align with existing governance structures; understand cross-cutting opportunities, such as the Local Development Plan, and work with partners to take the strategy forward.

Moray's LHEES will be managed as a project within the Council's Strategic Planning and Development section, working in partnership with stakeholders across the region. A draft strategy and delivery plan will be presented for the approval by the Council in April 2024. A public consultation will be held on the documents before final versions are presented for approval by the Council in June 2024. Thereafter, progress on the strategy will be reported to the Council's Climate Change Board and annually to the Economic Development and Infrastructure Services Committee.

7.2 Reporting and monitoring

To ensure the Council meets the requirements of the Local Heat and Energy Efficiency Strategies (Scotland) Order 2022, the following steps will be taken to report on and monitor Moray's LHEES and delivery plan.

Ongoing monitoring will be crucial to the success of the strategy and delivery plan. This will ensure that key outcomes are met, allowing for continuous improvements to adapt to changing requirements and incorporate new information and data. It will also help to ensure that Moray's LHEES and delivery plan remain dynamic and responsive documents. Significant delivery risks, changes, and achievements will be reported and incorporated into the Council's annual statutory Public Bodies Climate Change Reporting.

Regular progress updates will be reported to the LHEES Steering Group on a quarterly basis. A more formal review will occur every two years. This will include consideration on any new national or local policy and how these might influence this strategy and delivery plan. Furthermore, any new information and data will also be considered. Every 5 years the delivery plan will be reviewed and updated (if appropriate).

Significant achievements will be included in the Council's wider public-facing climate communications and communicated via established partnerships including Moray CAN and Moray Climate Assembly.

A series of targets/outcomes to measure success against each LHEES priority are included within the delivery plan.

8. Consultation summary

A public consultation was held on this strategy and delivery plan from 25 April to 16 May 2024. Copies of the documents were available on the Council's website and at libraries across Moray. Respondents were invited to comment on the documents as a whole and each of the priority areas and associated actions, indicating their thoughts and any associated remarks.

The results of the consultation are summarised as follows:

[to be included in final draft, post consultation]

Local Heat and Energy Efficiency Strategy (LHEES)
Delivery Plan 2023 - 2028

Draft for public consultation

moray
council

Contents

1. Introduction

The unique mix of rural communities and historic towns in Moray presents several challenges in achieving a just transition to a sustainable and climate resilient community. Moray's Local Heat and Energy Efficiency Strategy (LHEES) sets out to assist this by providing a framework for improving building energy efficiency and decarbonising heat sources.

This LHEES Delivery Plan details how Moray Council, in collaboration with key stakeholders, will translate the LHEES priorities into actions. By implementing these actions, we can create a cleaner, healthier, and more economically vibrant Moray for all.

The delivery plan is framed around what can be delivered now, given the existing policy and funding landscape, and is likely to be updated over time as the Scottish Government introduces new standards, regulation and delivery programmes, as well as potentially updated requirements, approaches and tools associated with the LHEES process.

The actions captured in this delivery plan are in draft, with the requirement for further stages of consultation and agreement over governance, timescales and specific details around completion. This will be carried out in the months following approval by the Council.

The finalised delivery plan will then be reviewed and updated by the Council's Climate Change officers on an annual basis as the policy and funding landscape changes. This first LHEES Delivery Plan incorporates actions with a near-term (5-year) focus, to put crucial steps in place to build to the longer-term goal of net zero, with clearer and more granular long-term steps to be set out in later LHEES iterations once government has a better understanding of local needs.

2. Delivery Plan

This delivery plan was developed to provide a platform for delivery of priorities identified within the Moray LHEES Strategy as detailed in Table 1.

Table 1. LHEES priorities for Moray.

	1. Building sustainable and climate resilient communities
	2. Maximising knowledge and awareness and ensuring certainty of success
	3. A just transition for the energy system
	4. Supporting a wellbeing economy, jobs and skills
	5. Tackling fuel poverty and improving health
	6. Improving the energy efficiency of buildings
	7. Decarbonising building heat sources

It has been developed in collaboration with key stakeholders to ensure a cohesive and considered approach to action across Moray. Actions have been defined across three timescales: immediate (within 6 months), short term (6 months to 2 years) and long term (2-5 years).

Funding and capacity to delivery upon actions is an issue for all stakeholders of this delivery plan. Actions which are necessary, but which are presently undeliverable within existing resources, have been highlighted throughout the document.

3. Actions

Actions were identified through engagement internally within Moray Council and externally with key stakeholders. These represent the actions which key stakeholders believed were most integral to Moray's net zero journey. They provide enabling actions for other key programmes of work, such as by providing key resource or funding. They also intend to solve current challenges which have been identified through this LHEES process, such as joining up the many parallel streams of work across the Council, better understanding attitudes towards low carbon or beginning to structure an approach to treat harder to access properties with private owners.

Actions within the delivery plan will be updated and amended as projects are identified and feasibility studies are concluded.

Many of these actions do not have confirmed funding however it is suggested that this is not a reason to avoid stating actions, but the lack of funding and further support needed from the UK and Scottish governments for their delivery needs must be emphasised and raised if proving a risk to wider decarbonisation.

These actions alone will not solve all of the issues we face. Local communities across Moray will need to engage in action, technological advances and adopt positive behavioural change. Public engagement, targeting increased awareness and policy support, will create a more informed and supportive community. It will also drive the changes in individual and collective behaviours needed to reduce carbon emissions and reach net zero.

Following this initial publication of a proposed list of actions, a more comprehensive and robust process should be carried out with each of the proposed action owners to:

1. **Agree and confirm the action owner:** This needs to be with respect to available resource to deliver the action but importantly will need to reflect the owner's expertise or power to enable delivery.

2. **Refine and add further detail to each action:** Action owners will need to add specifics to each action such as interim steps required, scope of the action and timeframes or resource needed.

3. **Determine risk factor:** Introduce a risk factor associated with each action.

4. **Confirm timescales and deadlines:** Suggested timeframes have been given in this Delivery Plan however it will be essential for the action owner to review this and ensure it is realistic. It may be desirable to make the timeframe more detailed than the three delivery categories given in this plan.

In addition to the long list of proposed actions, several major actions have been highlighted below as essential to the viability of Moray's LHEES:

1. Establish governance arrangements through alignment of actions within upcoming Moray Council Climate Change Strategy and the upcoming Moray-wide Climate Strategy

Align relevant internal actions within the Council's upcoming Climate Change Strategy for quarterly progress reporting to the Climate Change Board, and annual reporting to the Economic Development and Infrastructure Services Committee. External actions should be aligned within the upcoming Moray-wide Climate Strategy, with development led by Moray CAN.

Proposed action owner:	Strategic Planning and Development / Moray CAN
Timescale:	Immediate

2. Highlight funding gap, cost and data limitations

Engage with the Scottish Government to report the funding gap of £955m for domestic properties, as identified within the Moray LHEES. This will be based on the anticipated action required which is reported in the Moray LHEES plus taking a wider view of actions which are not captured in relation to buildings with non-traditional construction, non-domestic support needed and cost of renewables e.g. solar PV and battery systems.

The Scottish Government and the Energy Saving Trust will also need to support the Council to account for the limitations in the estimated costs output by the Energy Saving Trust's modelling tool, particularly owing to the rural nature of Moray.

The funding gap for the wider electricity and gas network constraints will require support from network operators. The Council is willing to work with network operators to progress electrification of heat projects where the grid is less constrained in the short term, and plan in the other areas as part of a longer-term strategy.

Proposed action owner:	Strategic Planning and Development
Other stakeholders to be included:	Scottish Government, Ofgem, utility network operators
Timescale:	Immediate

In line with other local authorities, a more detailed delivery plan will be produced in 2025 once the action setting process has been undertaken fully and in recognition of any government announcements following publication of the initial LHEES Strategy and Delivery Plan documents.

4. Requirements of the Scottish Government

Ongoing collaborative efforts, including funding, communications, and strategic support from the Scottish Government, are essential for the successful operation of Moray's LHEES. These requirements are detailed in Tables 1 to 4.

As discussed in Section 1, this delivery plan will be reviewed annually to take account of changes in the policy and funding landscape resulting from consideration of LHEES across Scotland. Early engagement by the Scottish Government with local authorities is encouraged with respect to changes in standards, regulation, delivery programmes and funding. The use of ring-fencing in this area should be considered to ensure that strategic priorities are delivered upon.

Table 1. Funding requirements.

Requirement	Outcome
Provide a significant increase in funding to support energy efficiency and heat decarbonisation projects and supporting activities (fuel poverty; engagement; data collection, modelling and analysis; funding for community organisations). Moray has over 49,000 buildings, the majority of which will need to be retrofitted. Domestic measures equate to an estimated £22k per dwelling.	Greater funding availability and ability to deliver projects.
Provide significant funding for research institutions, local authorities, social landlords, and others to develop studies and Building Information Modelling (BIM) for archetypes.	Guidance for each building archetype.

Table 2. Knowledge and awareness requirements.

Requirement	Outcome
Produce a national communications toolkit to raise awareness of Local Heat and Energy Efficiency Strategies; energy efficiency and heat decarbonisation measures; support and advisory services.	Improved awareness and behavioural change.
Deliver a public communications programme to raise awareness of the support and advisory services available and to encourage home upgrades, to maximise uptake of these schemes.	

Table 3. Research and data requirements.

Requirement	Outcome
Encourage use of Building Energy Management Systems and sub-metering by building owners and sharing of data.	Greater awareness of building performance.
Develop a sustainable data sharing model and platform.	Improved data accessibility and transparency.
Research the density of new housing/building developments required to support a new heat network.	Improved modelling.
Research how indoor air quality is impacted/improved by energy efficiency and heat decarbonisation measures by: • Ensuring indoor air quality and retrofitting building are fully considered in the Clean Air Strategy 2. • Agreeing standard methodology for monitoring indoor air quality pre- and post-retrofit, including pilot projects. • Developing a framework model to identify how factors impact indoor air quality (e.g. insulation type, air tightness). • Convening a task group to identify actions to be undertaken to address issues associated with indoor air pollution.	An understanding of how risks related to poor indoor air quality can be mitigated to make improved decisions on which building level actions to implement.
Model heat efficiency in the context of changing workstyles now and in the future.	Greater insight of heat demand.

Table 4. Policy/incentive gap requirements.

Requirement	Outcome
Map policies/targets to evidence and tools to provide a timeline of anticipated improvements.	Improved awareness and accessibility to key policies.
Clarify the phrase "as far as reasonably possible" within the context of the Heat in Buildings Strategy.	Improved understanding of targets.
Incentivise and/or further regulate developers to ensure new builds are suitable for decarbonised heating.	New builds which are suitable for net zero.
Work with the Building Research Establishment on energy performance certificate reform to develop an improved metric.	An improved energy performance metric.
Agree a new Energy Efficiency Standard for Social Housing 2 target, aligned to net zero and supporting fuel poverty eradication. Develop policy levers to support short-term mitigation to alleviate current grid capacity pressures. For example, revise the battery storage definition; private wire for heat networks; surplus from private grids/renewables to power local buildings.	A revised target.
Continue to support National Planning Framework 4 Policy 19: *Development proposals within or adjacent to a Heat Network Zone identified in a Local Development Plan will only be supported where they are designed and constructed to connect to the existing heat network.*	Alleviation of grid pressures and improvement in capacity.
Provide further clarification on requirements around operation, maintenance, KPIs, obligation to connect, consumer protection and community wealth building aspects (e.g. mandating community shares).	Heat networks become standard consideration for developments and existing implementation considerations are addressed.

5. List of Actions

Ongoing collaborative efforts, including funding, communication, and strategic support from the Scottish Government, are essential for the successful operation of Moray's LHEES. These requirements are detailed in Tables 1 to 4.

						Priorities	
Priority 1: Building sustainable and climate resilient communities.							
Action	**Action owner**	**Description**	**Timescale**	**Targets/ Outcomes**	**Deliverable within existing resources?**	**Achieving net zero**	**Adaptation**
Support community-led energy efficiency and adaptation projects	Moray CAN	Continue to connect to grant providers, technical assistance, and training opportunities for community groups looking to lead on energy efficiency and adaptation projects in their local areas.	Immediate	Increased number of community-led projects supported, and carbon emissions saved through these projects. Increased community skills and capacity for climate action, measured by workshops attendance or volunteer hours.	Yes	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities	
						Achieving net zero	**Adaptation**
Encourage formation of community energy cooperatives	Moray CAN	Encourage the formation of community energy cooperatives, where residents collectively invest in renewable energy projects. Doing so will enhance community resilience, generate clean energy and empower communities economically and socially.	Short term	Number of new community energy cooperatives established, and MWh of renewable energy generated. Investment attracted by cooperatives from local residents and organisations.	No	✔	✔
Enhance community resilience within local strategic planning	Strategic Planning & Development	Integrate climate resilience considerations into Moray's new Local Development Plan. Incorporate green infrastructure, flood resilience measures, and passive cooling strategies to future-proof buildings and communities against the impacts of climate change.	Short term	Integration of climate resilience measures in new developments. Increased awareness and understanding of climate risks and adaptation measures amongst local planners and developers.	Yes.	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities	
						Maximise knowledge and awareness	Ensure certainty of success
Improve knowledge amongst staff and stakeholders	Moray Council Heads of Service	Continue to participate in and facilitate access to relevant training sessions, conferences, workshops and other knowledge sharing events between industry, experts, and council officers to improve knowledge on energy efficiency and heat decarbonisation.	Immediate	Increased participation of staff in training sessions and other knowledge sharing events. Improved knowledge and understanding of energy efficiency and heat decarbonisation measures amongst all staff which is kept up to date. Development of internal capacity to support LHEES implementation effectively.	Yes	✔	✔

Action	Action owner	Description	Timescale	Targets/Outcomes	Deliverable within existing resources?	Priorities	
						Maximise knowledge and awareness	Ensure certainty of success
Undertake education and awareness campaigns	Moray CAN	Launch public education campaigns to raise awareness about the importance of energy efficiency and sustainable heating practices. Engage schools, community groups, and local media to promote behaviour change and empower individuals to take action in their homes and workplaces. Raise awareness of climate change and build capacity for adaptation and mitigation actions.	Immediate	Increased public awareness of climate change, energy efficiency, sustainable heating practices and the need for behavioral change and action. Demonstrable changes in attitudes and behaviours towards energy conservation and sustainable heating solutions, identified through case studies and surveys. Increased engagement in LHEES initiatives and community-led projects. Members of the public indicate that they feel empowered to take action in their homes and workplaces.	Yes	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities	
						Maximise knowledge and awareness	Ensure certainty of success
Ensure retrofitting plans are aligned between Council and Registered Social Landlords	Housing and Property	Host and participate in joint meeting with RSLs to align social housing retrofit plans in the future.	Immediate	Consistency and coherence in retrofitting approaches across Council and RSL building stock.\n\nAlignment of decarbonisation engagement approaches to simply communication and encourage tenant buy-in to sustainable solutions.	Yes		✔
Support research on public attitudes towards renewable technologies in Moray	Strategic Planning & Development	Support ongoing research at UHI on local public attitudes towards renewable technologies through facilitating interviews, data sharing and provision of expertise.	Short term	Publication of research findings on public attitudes towards renewable technologies.\n\nDevelopment of recommendations based on research findings to inform ongoing Moray LHEES strategy.	Yes	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities	
						Maximise knowledge and awareness	Ensure certainty of success
				Increased understanding of public concerns and preferences to guide effective communication and engagement strategies.			
Raise awareness of LHEES in Moray	Strategic Planning & Development	Undertake engagement sessions with the public and businesses as part of the Local Development Plan development process.	Short term	Number of engagement sessions conducted with different groups.	Yes	✔	✔
	Moray CAN	Conduct deeper engagement with community representatives, environmental groups, and industry experts can provide valuable insights and foster ownership of the strategy among diverse stakeholders. Hosting public forums and workshops to facilitate meaningful dialogue and increase community buy-in.		Increased understanding of LHEES priorities and actions, and enhanced sense of strategy ownership amongst stakeholders, measured by annual pulse survey.

Identification of stakeholder concerns and suggestions to inform LHEES development. | Yes | | |

Priority 3.   A just transition for the energy system

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities
---	---	---	---	---	---	A just transition
Identify communities and workers most impacted by the energy transition	UHI Moray	Conduct mapping and assessments to understand the specific needs and challenges of communities and workers reliant on industries affected by the transition.	Immediate	Identify communities and workers most impacted by the transition, with detailed profiles and needs assessments.	Yes	✔
Establish a Just Transition Fund to support affected communities and businesses.	Scottish Government	Provide a dedicated funding programme in Moray to support infrastructure upgrades, economic diversification initiatives, and community-led projects.	Short term	Increased investment in impacted communities, job creation, reduced reliance on fossil fuels for energy needs, and diversification of local economies	?	✔
Promote fair work practices and working standards in the renewable energy sector	Scottish Government	Facilitate the development of industry-wide agreements on fair wages, worker safety, and training opportunities in the renewable energy sector.	Long term	Improved labour standards and working conditions in the renewable energy sector.

Workers are incentivised to make the transition. | ? | ✔ |

Priority 4.   Supporting a wellbeing economy, jobs and skills

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Skills and jobs	Community wealth building	Finance
Encourage green startups and diversification of existing businesses	Business Gateway Moray	Provide business support to new start-ups and existing businesses in Moray.	Short term	Increased number of green startups launched and established businesses expanding. Creation of new green jobs in Moray. Attraction of investment in green businesses and innovations.	Yes	✔	✔	✔
Provide dedicated support to encourage green business development in Moray	Business Gateway Moray	Provide a programme of support to green start-ups and existing businesses, delivering opportunities for collaboration and upskilling. Administer green start-up and equipment grants for areas specified as required in Moray.	Long term		No	✔	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Skills and jobs	Community wealth building	Finance
Improve awareness of job and learning opportunities associated with LHEES	Moray Local Employability Partnership/ DYW	Work with employers and industry associations to connect individuals with green job and learning opportunities.	Long term	Growth in participation in LHEES-related job and learning opportunities. Monitored using enrolment figures in relevant courses, apprenticeships, jobs and training initiatives. Improved employer engagement. Employers are actively involved in promoting and offering LHEES-related jobs and learning opportunities. Increased awareness of opportunities as surveys demonstrate improved understanding and interest in LHEES career paths.	Yes	✔		

Priority 5.   Tackling fuel poverty and improving health

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Identify non-domestic buildings with largest potential energy savings.	Strategic Planning & Development	Analyse building data to identify those with the largest heat demands, engage with the building's owner and propose/support a high-level energy efficiency analysis. These buildings may offer the largest impact from energy efficiency improvements.	Immediate	Top 10% of non-domestic buildings by heat demand identified and initial engagement completed.	No		✔	
Improve building management systems.	Housing & Property	Accelerate ongoing works to improve building management systems in all public buildings where appropriate, to more accurately monitor and improve building performance	Immediate	Improvement in building energy performance in public buildings.	No		✔	

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Conduct ongoing stakeholder engagement with gas and energy networks.	Strategic Planning & Development	Continually engage with SGN and SSEN to ensure effective strategic planning.	Immediate	Energy network infrastructure plans are aligned with LHEES plans and priorities.	Yes.	✔	✔	
Align existing investment and asset management plans with LHEES.	Housing & Property	Review existing investment and asset management plans to target energy efficiency improvements of buildings within the Council's portfolio.	Short term	All existing investment and asset management plans aligned with LHEES objectives.	Yes.	✔	✔	✔
Create energy efficiency improvement plans for council owned buildings.	Housing & Property	Conduct energy efficiency audits of all relevant council owned buildings and produce improvement plans which demonstrate potential carbon and financial savings.	Long term	100% of council owned buildings with energy efficiency improvement plans	No.	✔	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Conduct ongoing internal engagement within the Council.	Strategic Planning & Development	Continue to engage with council sections to streamline the approach to delivery of LHEES information and energy reduction strategies.	Short term	Increased awareness and understanding of LHEES objectives across all relevant council services, measured by pulse surveys.	Yes.	✔	✔	✔
Understand the decarbonisation plans of large organisations.	Moray CAN	Build upon engagement work by identifying and engaging with large organisations which are known to have several properties or a high energy demand, to understand their decarbonisation plans and any support they may require.	Long term	Engagement evidence report produced which will inform future LHEES iterations.	Yes		✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Develop a fund for initial homeowner/ private landlord retrofit surveys.	Scottish Government	Develop a fund for initial retrofit surveys which is accessible to all homeowners and private landlords to remove this initial barrier to action.	Short term	Funding secured and initial homeowner/ private landlord retrofit survey programme launched.	?	✔		
Create retrofit and new build living exemplars and showcase to the public and developers.	Strategic Planning & Development	Develop retrofit and new build exemplar buildings as part of the Moray Growth Deal to demonstrate the potential for fabric retrofit, battery storage, solar PV, insulation, heat pumps, and other innovative measures to work effectively. Host showcase events at the buildings as a learning opportunity for the public and developers.	Long term	Two exemplar buildings completed and showcased to the public and developers. Lessons learned shared to inform future LHEES iterations and national building and planning policy.	Yes.	✔	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Review and develop heritage buildings and unconventional construction guidance.	Strategic Planning & Development	Develop user friendly guidance for heritage and unconventional building owners. Consolidate existing resources, explain acceptable improvements, and outline available financial support to empower them to navigate energy efficiency and heat decarbonisation while respecting unique building and site characteristics.	Long term	Guidance made available for owners of heritage and unconventional building owners. Increase in funding applications (and planning applications where applicable), demonstrating progress in decarbonisation efforts.	Yes.	✔	✔	✔

Priority 6.   Improving the energy efficiency of buildings

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities	
						Reducing energy costs	Improved health outcomes
Promote energy literacy and behavioural change	Moray CAN	Continue to provide education and resources to empower people to use energy more efficiently and make informed choices about their energy consumption.	Short term	Increased awareness of energy-saving methods.	Yes	✔	
Strengthen healthcare interventions	NHS Grampian	Ensure healthcare professionals routinely identify and address fuel poverty as a social determinant of health. Integrate fuel poverty support into medical care and social prescribing programmes.	Short term	Reduced incidence of health problems associated with cold homes.	?		✔
Increase support for low-income households	Scottish Government	Implement targeted grants, benefits, and top-ups to energy bills for those most in need.	Short term	Reduce the number of households in fuel poverty in line with national targets.	?	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities	
						Reducing energy costs	Improved health outcomes
Advocate for policy and regulatory changes	Moray Council Leader	Lobby for stronger UK and Scottish government policies to regulate energy prices, reform the energy market, protect vulnerable consumers, and invest in renewable energy solutions.	Long term	Secure specific policy changes and government funding commitments.	Yes.	✔	✔
Invest in research and innovation	Strategic Planning & Development	Develop and test new technologies and solutions as part of the Moray Growth Deal to make energy more affordable and accessible, particularly for vulnerable groups. Compile case studies and present findings to Scottish Government.	Long term	Case studies produced highlighting lessons learned from Moray Growth Deal projects.	Yes.	✔	✔

Priority 7.   Decarbonising building heat sources

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Designate Moray heat network zones	Strategic Planning and Development	Designate within local planning policy the heat network zones identified by the Moray LHEES Strategy. Publish statement in accordance with Heat Networks (Scotland) Act 2021 and review in no more than 5 years from date of publication.	Immediate	Heat network zones are designated for Moray, encouraging increased use of this method of heat decarbonisation. Statutory obligations within the Heat Networks (Scotland) Act 2021 are met.	Yes.			✔
Identify existing electricity grid capacity to meet heat decarbonisation requirements	SSEN	Conduct comprehensive assessments of grid capacity and potential upgrades needed to support widespread electrification of heating.	Short term	Identified areas with sufficient capacity for heat decarbonisation requirements. Need assessment and projected costs of infrastructure upgrades.	Yes	✔	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Develop and implement financial incentives for on-grid heat pump installations	Scottish Government	Introduce grants, rebates, or tax breaks to encourage homeowners and businesses to switch to electric heat pumps.	Short term	Increased number of non-domestic properties with heat pumps installed.	?	✔	✔	
Targeted support for low-income households and vulnerable communities	Scottish Government	Provide additional financial assistance and access to information and resources for low-income households and vulnerable communities transitioning to low-carbon heating solutions.	Short term	Reduction in fuel poverty.	?	✔		✔
Facilitate the development and expansion of heat networks	Scottish Government	Provide regulatory support, funding, and technical assistance for communities to establish or expand district heating networks fuelled by renewable sources.	Long term	Increased number and capacity of heat networks in Moray.	?	✔	✔	✔

Action	Action owner	Description	Timescale	Targets/ Outcomes	Deliverable within existing resources?	Priorities		
						Domestic properties	Non-domestic properties	Heritage buildings
Facilitate opportunities to advance heat network opportunities in Moray	Strategic Planning and Development	Collaborate on project development and implementation of heat networks in Moray identified within the LHEES, and as designated as heat network zones.	Long term	Opportunities to develop heat networks in Moray are realised.	Yes.	✔	✔	✔

6. Stakeholder Engagement

Stakeholder engagement is crucial to the success of Moray's LHEES strategy. Throughout the strategy development process, the Council has engaged with internal and external stakeholders at key stages in line with the LHEES methodology.

Stakeholders provided comments and feedback on a draft of the LHEES strategy and delivery plan, and this was used in the creation of the existing versions.

If approved by the Council, a 3-week public consultation will be held from 25 April to 16 May 2024. Following this consultation, amendments will be made where necessary and a final version presented to the Council for approval on 26 June 2024.

The Moray LHEES steering group will be expanded to include all agreed action owners within the delivery plan. This group will meet quarterly to update action progress which will then be reported to the Council's Climate Change Board.

Going forward, stakeholder engagement will continue to be necessary as the strategy enters delivery. Changeworks have provided the following stakeholder engagement materials to ensure that compliance with the LHEES methodology is achieved.

6.1   Stakeholder influence mapping

An Influence/Interest Matrix has been used to map stakeholders within the Moray area. This provides a clear picture of the level of engagement required for each stakeholder and quickly highlights who the high priority stakeholders are.

The following engagement level is a recommended starting point for each tier, based on Zero Waste Scotland/Arup LHEES guidance:

TIER 1 – Part of Project Steering Group (PSG). Ongoing engagement throughout the project at defined workshops e.g. identifying priorities and for delivery. Specific engagement plans developed as required.

TIER 2 – Participate in workshops and engage with the project at key milestones (if required). Potentially one-to-one contact during data collection stage and one-to-one interviews to be held with these stakeholders to gain further insight and understanding of priorities and delivery contributions.

TIER 3 and 4 – Potentially participate in workshops and engage with the project at key milestones (ad hoc basis e.g. delivery planning). Receive a direct invite to public consultation.

Figure 1 indicates there are 20 tier 1 stakeholders highlighted.
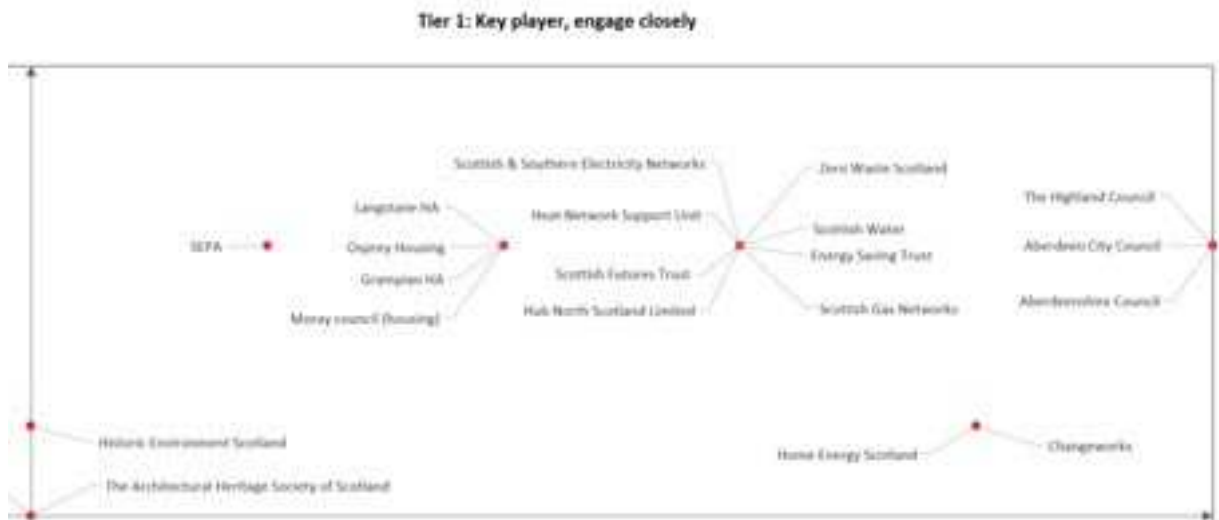
Figure 1. Tier 1 influence mapping to date.

An engagement plan is required to detail activities for specific stakeholders to track engagement, where this is key to the LHEES strategy/development (e.g. for some Tier 1 stakeholders or a specific heat network project).

The LHEES methodology (section 3.1.2) specifies that the Engagement Plan should cover the following aspects:

● Purpose of engagement
● Frequency of engagement
● Type of information required
● Stakeholder's priorities, interest and expectations for LHEES
● Level of involvement with LHEES delivery

6.2   Key groupings and associated engagement actions

Each engagement group has been categorised based on similarities in their interest relating to LHEES. For each grouping, key questions and outcomes are discussed, alongside the planned engagement strategy.

1. Local authorities

Key stakeholders include:

● Aberdeenshire Council
● Aberdeen City Council
● The Highland Council

The joint procurement strategy agreed between Moray, Aberdeenshire, Highland, and Aberdeen City councils is intended to clearly outline the procurement and commercial priorities from 2023 to 2026 for the partners to the Commercial and Procurement Shared Service, taking account of the local ambitions and priorities for each partner.

This provides a strong opportunity for collaboration and alignment of approach across the four partner local authorities and has potential to contribute to meeting each local authority's LHEES targets.

Actions:

● Develop a list of existing programme of works developed under this framework.
● Explore potential avenues for expansion of these works.
● Review written LHEES of each LA and earmark areas for collaboration / investigation, many are still at draft stage and have potential for updates.
● Set up working group for partners in the strategy, building on existing LHEES governance and oversight group meetings currently taking place. Changeworks can provide LHEES contact details for Aberdeenshire, Aberdeen city council and Highland Council and facilitate kick off meeting.
● Set up regular working group linked to LHEES; define aims / outcomes and schedule meeting times.

2. RSLs and housing development groups

Key stakeholders include:

● Moray Council
● Langstane Housing Association
● Grampian Housing Association
● Osprey Housing Association
● Tulloch Homes (Osprey Housing Association)
● Springfield Properties

Engagement with RSLs has started with a series of meetings held with individual housing associations, see notes below. This has primarily focussed on:

● Stock condition data
● Funding streams
● Planned pipeline of work

Osprey Housing Association – project pipeline

New build projects:

- 30 units in Buckie, 1-4 bed (houses / bungalows mix), ASHP – Mitsubishi is their preferred supplier of heat pumps.
- Kinnedder street, Lossiemouth – 8 units, 1-4 bedrooms, ASHP.
- Hopeman - 4 cottage style flats, ASHP.
- Potential project in Elgin town centre for NHS key worker flats, 20 units, design TBC Construction developed under section 75 requirements; Osprey is content with this niche as it works for the population density in the area. However there is less control over certain design aspects.

Retrofit projects:

- 559 properties, 443 gas fed, 109 heat pump, 7 oil based.
- Electric storage heaters have been replaced with ASHPs .
- Shaw Place and Pinefield Crescent, Elgin, ex MOD housing - CWI extract and refill - approx. 100 properties. This stock type may also need under floor insulation too if the minimum standard of the SHNZHS is introduced.
- Additional 70-80 properties which are 50 years old and requiring loft top up

Current development strategy:

- Existing relationship with Tulloch Homes to develop properties based on a minimum performance specification set out by Osprey.
- Oil boilers will be replaced with ASHP as they come to end of life, have been doing this for at least 2 years across Aberdeenshire and Moray. No decision on gas transition due to SHNZS/HiBS guidance not being confirmed.

Barriers / constraints / opportunities:

- Challenges with contractor competency and general poor project management/communication. Expressed concern with larger contracts, there is less organisation and transparency about what is going on on-site, through work with Everwarm it was not clear when works were scheduled for certain properties.
- As a trial, Osprey are going to pilot smaller contracts with local contracts to test for improvements on communication and installations.
- SHNZS / EESSH 2 transition.

Grampian Housing Association – project pipeline

- 300 properties require new heat pumps. As Grampian Housing Association were early adopters, these properties do not meet the criteria for match funding with replacement costs around £8k. These properties are in a coastal area with high corrosion, contributing to some faster degradation.
- Recently installed and commissioned a small communal heat pump system replaced 20 individual boilers in Turriff. There is potential scope to replicate this in properties on Turner Street Court in Keith.

New build projects:

- Developed in collaboration with volume house builders Barratt Homes and Springfield. Currently ASHPs installed as standard design led by developers. These developers and contracted to offer a percentage of properties as social housing which are purchased by Grampian HA.

Current development strategy:

- Investigating potential to change heating to storage heaters + DHW cylinders. Points raised regarding connection incentives potentially impeding heat for new build stock.
- Grampian Housing Association carried out some pilot project work investigating infrared ceiling film in conjunction with PV and batteries where property type allowed. Findings overall were inconclusive to develop strategy further.

Barriers / constraints / opportunities:

- Highlighted significant opportunities of using waste heat resources around Moray, distilleries of particular interest. It was noted that any network developed with distilleries are subject to business success of the distilleries and are at risk should the company go out of business. Unclear who would provide heat to properties in this scenario and what consumer protection safeguarding will be in place.
- Raising awareness of the significant challenge that should be highlighted within the LHEES and to ScotGov around replacement of old heat pumps and a lack of funding to do this.

Actions:

- Investigate working group development with regular meetings for RSLs operating in the area
- Develop briefing for what Moray's role will be in this group moving forward. Is there scope to develop a shared contractor / consultant framework to accelerate retrofit in the local area?
- During meetings, the aim is to understand key priorities, strategies and targets for the organisation. Where do these align with LHEES? Are there further opportunities for alignment in the future?

3. Partnership organisations

Key stakeholders include:

- Hub North
- Moray CAN
- University of the Highlands and Islands

Partnership organisations should be used by local authorities as they can provide support on collaborative projects between the public sector, local government, industry and academia. Using their contacts and bringing relevant stakeholders together to discuss LHEES proposals will be key in the transition from strategy documents to delivering projects around the Highlands.

Actions:

- Obtain consultation response from Hub North on finalised LHEES.
- Discuss Hub North's continued role in the shift from LHEES writing to delivery.
- Support ongoing research of relevance at the University of the Highlands and Islands, facilitating access to data and resources where appropriate.
- Provide regular progress updates to Moray CAN and seek feedback from expert advisory group where appropriate.

4. Utility companies

Key stakeholders include:

- SSEN
- SGN

To understand the opportunities and constraints across Strategic Zones and Delivery Areas, engagement and collaboration with DNOs and local utility companies (including existing district heating networks) is essential. Input and data from utility companies should build a picture of opportunities, constraints, challenges and any need for further discussion and input from the utility companies.

Actions:

- Investigate how Moray can use SSEN's new LENZA tool to highlight known areas of constraints and/or capacity (to support LHEES demand led approach). Overlay these areas with LHEES data work to build a picture of critical areas for infrastructure upgrade.
- Set out process for grid upgrade works and highlight the practical impacts of this on LHEES planning
- Develop understanding of planned electricity network upgrades. Explore how this may impact LHEES Delivery Plans or shape future iterations. DNOs strategic priority areas / focus in the short-, medium- and long-term.
- Develop process for information sharing between the council and DNO. Is there an opportunity for the council to influence upgrade plans to suit LHEES or vice versa.
- Gain an understanding of whether there are any DNO (SSEN) low carbon energy projects, pilots or feasibility studies.

5. Heat network development

Key stakeholders (for category 1 heat network) include:

- Moray Council HQ
- Moray Leisure Centre
- Elgin Academy
- Elgin High School
- Elgin Town Hall
- Elgin Library
- Elgin Sheriff Court
- UHI Moray
- Dr Gray's Hospital

Moray Council will focus on developing plans in the Elgin area initially.

Actions:

- Develop finalised list of relevant stakeholders including community groups.
- Commission feasibility study including technological and economic appraisal of the available options taking local development plans into account.
- Set out actions and planned timeline based on the feasibility study.
- Engage the Scottish Government regarding heat network funding options.
- Run community engagement session to disseminate plans.

REPORT TO: SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024

SUBJECT: NATURAL CAPITAL ENHANCEMENT OPPORTUNITIES

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

1. **REASON FOR REPORT**

1.1 To present the results of studies conducted to identify natural capital enhancement opportunities in Moray, and to seek the agreement of the Council to progress the opportunities identified via the local development plan and development of a suitable project delivery model.

1.2 This report is submitted to Council in terms of Section III (F) (33) of the Council's Scheme of Administration relating to providing, developing and monitoring the Council's Economic Development and Infrastructure Services.

2. **RECOMMENDATION**

2.1 **It is recommended that Council:-**

   (i) **considers and notes the contents of studies conducted to identify natural capital enhancement opportunities on Moray Council managed land (Appendix 1) and the wider Moray area (Appendices 2 and 3); and**

   (ii) **agrees that the opportunities identified be progressed as part of the Council's next local development plan and through development of a suitable project delivery model to be presented to and agreed by a future meeting of the Council.**

3. **BACKGROUND**

3.1 The Council has a statutory duty under the Climate Change Act (2009) to sustainably adapt to climate change and reduce carbon emissions, working towards local and national net zero targets. Increasing the level of carbon sequestered within landholdings is an important and necessary measure to achieve these aspirations, and to reduce costs to the public associated with carbon offsetting outside of the region.

3.2   As Planning Authority, the Council also has a statutory duty under the Town and Country Planning Act (1997) to prepare a local development plan (LDP) which takes account of the national planning framework. Under National Planning Framework 4, it is expected that LDP spatial strategies should be "designed to reduce, minimise or avoid greenhouse gas emissions" and that LDPs in general should "protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy. They should 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".

3.3   Therefore, as part of the production of a Just Transition Masterplan, studies were conducted to report on natural capital enhancement opportunities and delivery mechanisms in Moray. Research costs to enable this were funded by the Scottish Government.

3.4   Natural capital is the environmental resources, habitats and ecosystems from which a flow of social, environmental and economic benefits to people can be generated. It includes air, water, minerals, soil, coast, woodland, grassland, heathland, and farmland.

3.5   Investing in the quality and expansion of natural capital assets can therefore realise significant benefits for people and help to tackle the twin crises of climate and nature.

3.6   In addition to environmental benefits, such work has the potential to deliver several economic and social benefits including job creation, improved public health and social cohesion, and enhanced tourism, recreation and educational opportunities.

4.   OPPORTUNITIES WITHIN MORAY COUNCIL LANDHOLDINGS

4.1   A study to examine opportunities for natural capital enhancements within the Council's landholdings was undertaken by officers in Strategic Planning and Development, based on initial research conducted by LUC (**Appendix 1**).

4.2   The study involved analysis of mapping data to identify a baseline and potential carbon sequestration value for council landholdings. These figures estimate how much carbon is currently removed from the atmosphere by land, and how much could be removed if further enhancements are pursued.

4.3   Extensive stakeholder consultation with representatives from different council services was conducted to identify key opportunities and constraints for any potential future change on sites.

4.4   133 hectares of land were found to be potentially suitable for change to increase carbon sequestration. The total carbon sequestered by this land is estimated to be 71 tCO_2e per year.

4.5 Two key opportunities were identified as suitable for uptake – tree and shrub planting and grassland enhancement. It is estimated that pursuing these opportunities could lead to a maximum carbon sequestration value of 1,341 tCO_2e. This equates to 5.2% of the Council's existing carbon emissions.

5. **OPPORTUNITIES ACROSS MORAY**

5.1 A strategic natural capital assessment of the Moray area was conducted by LUC in collaboration with officers in Strategic Planning and Development (**Appendix 2**).

5.2 This study identified opportunities for enhancement, including a high-level benefit assessment and an assessment of skills requirements for undertaking the opportunities identified. Research was also undertaken to provide an overview of the carbon sequestration role of green walls and green roofs (**Appendix 3**).

5.3 Stakeholder engagement was undertaken on natural capital delivery mechanisms, including developer obligations, payments for ecosystem services (including carbon markets) and grant funding opportunities.

5.4 The study found multiple areas for enhancement across Moray across five key areas:
- Peatland restoration;
- River flood risk and water quality management;
- Coastal flood risk management;
- Woodland enhancement; and
- Agricultural land enhancement.

6. **NEXT STEPS**

6.1 The contents of the studies will be used to inform the development of the Council's Local Development Plan 2027. Once projects are established, it will be possible to develop a procedure to obtain financial contributions towards these from developers where they evidence that net zero cannot be achieved onsite.

6.2 Opportunities for natural capital enhancements will be pursued in line with the Council's Climate Change Strategy. It is recommended that a delivery model is developed to move forward projects at a range of scales. This is likely to take the form of a partnership approach to include projects which could be fully community led to maximise community buy-in.

7. **SUMMARY OF IMPLICATIONS**

(a) **Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))**
Development of natural capital and carbon sequestration opportunities is an action of the Council's Climate Change Strategy 2020-2030 which supports the priorities set out in the Corporate Plan.

(b) Policy and Legal
The Climate Change (Scotland) Act 2009 places a duty on public bodies to act in a way that they consider most sustainable and in the way best calculated to deliver the emission reduction targets set in the Act.

The Town and Country Planning Act (1997) places a duty on the Council to prepare a local development plan for the district which takes account of the national planning framework.

(c) Financial implications
There are no financial implications arising from this report.

(d) Risk Implications
There is a risk that the Council will be unable to meet its obligations under the Climate Change (Scotland) Act 2009 if it does not progress measures to remove carbon emissions.

There is a risk that opportunities to improve the local environment, deliver job creation, improved public health and social cohesion, and enhanced tourism, recreation and educational opportunities will not be realised if measures are not progressed and implemented within the local development plan.

(e) Staffing Implications
There are no staffing implications arising from this report. Once a delivery model is developed, this will be presented to the Council for approval along with any staffing implications.

(f) Property
There are no property implications directly arising from this report. Following development of a delivery model for natural capital enhancements, any landholdings identified as potentially suitable for change will be assessed on a case-by-case basis in collaboration with key stakeholders.

If any proposed improvements would lead to change of use of common good land then this would be subject to a statutory public consultation under S.104 of the Community Empowerment (Scotland) Act 2015 to ensure community support for the proposals.

(g) Equalities/Socio Economic Impact
There are no equalities/socio economic impacts at this stage. This will be considered and an equalities impact assessment carried out as part of the development of a delivery model for natural capital opportunities.

(h) Climate Change and Biodiversity Impacts
This proposal could help to address the climate emergency by progressing plans to sequester carbon emissions in Moray. No significant climate change or biodiversity impacts have been identified.

(i) Consultations

Consultations have been undertaken with the Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Head of Housing and Property, the Programme Manager (Learning Estate), the Property Asset Manager, the Equal Opportunities Officer, and the Democratic Services Manager.

8. CONCLUSION

8.1 Significant potential exists for natural capital enhancement across Council landholdings and the wider Moray area. Progression of the opportunities identified could have numerous benefits including removal of carbon from the atmosphere, job creation, improved public health and social cohesion, and enhanced tourism, recreation and educational opportunities.

8.2 The contents of the natural capital enhancement studies will be used to inform the development of the Council's Local Development Plan 2027, including on a mechanism for financial contributions towards these measures.

8.3 A delivery mechanism will be developed to deliver natural capital enhancements in line with the Council's Climate Change Strategy. This is likely to take the form of a partnership approach to maximise community buy-in and would be the subject of a further report.

Author of Report: George Gunn, Climate Change Strategy Officer
Background Papers:
Ref: SPMAN-813460984-530

Moray Council Natural Capital and Carbon Sequestration Study
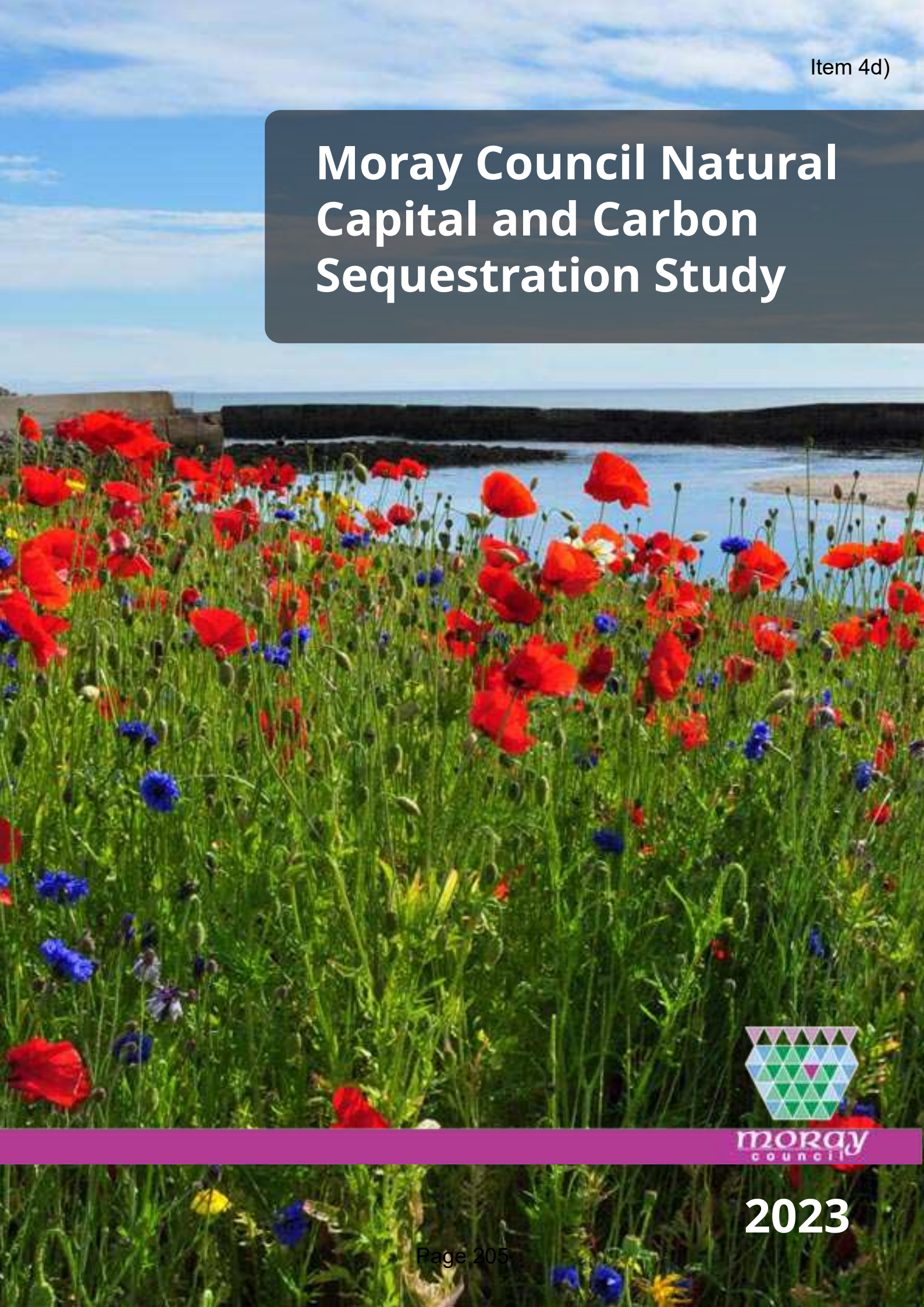
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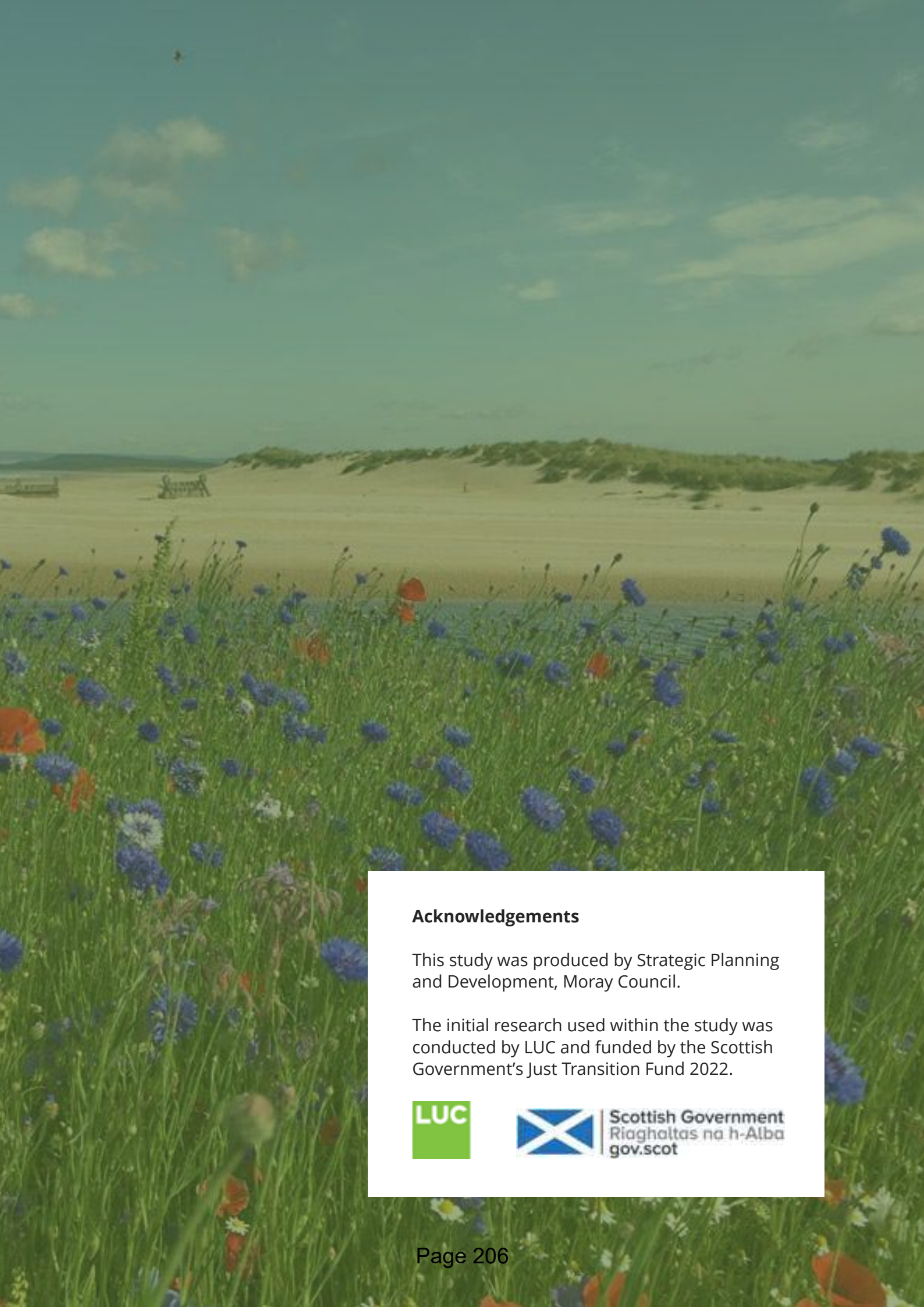
Contents

1. Executive Summary

Moray Council has a statutory duty under the Climate Change Act (2009) to sustainably adapt to climate change and reduce carbon emissions, working towards local and national net zero targets. Increasing the level of carbon sequestered within existing landholdings is an important and necessary measure to achieve these aspirations, and to reduce the costs associated with external carbon offsetting.

This study, based on research funded by the Scottish Government's Just Transition Fund 2022, assessed the potential for carbon sequestration on the Council's landholdings. The study found that up to 1,340.8 tonnes of carbon dioxide equivalent (tCO2e) per year could be sequestered on 132.9 hectares of land, worth £271,483 per annum. This can be achieved by planting trees and shrubs, and by enhancing grassland. Where land has an existing use, it is recommended that any interventions should be designed to complement this.

In addition to environmental benefits, this work has the potential to deliver several economic and social benefits including job creation, improved public health and social cohesion, and enhanced tourism, recreation and educational opportunities.

To maximise the impact of these opportunities, it is essential that the actions recommended within this study are aligned with existing and upcoming environmental strategies, and that it is implemented as part of a multi-benefit, place-based approach with the community and other relevant partners.

2. Introduction

Moray Council is committed to achieving net zero carbon emissions by 2030. This is a challenging but pertinent aspiration, as climate change is one of the most pressing issues facing future generations. Underpinning this need for action is a statutory duty upon the Council to reduce greenhouse gas emissions and adapt to a changing climate in the most sustainable manner.

One way that the Council can move towards net zero emissions is by increasing carbon sequestration within its own landholdings. Carbon sequestration is the process of locking carbon dioxide from the atmosphere back into the land. It can be achieved through a variety of methods, such as planting trees, restoring wetlands, and changing land use practices.

Initial research into carbon sequestration opportunities on Moray Council owned land was funded by the Scottish Government's Just Transition Fund 2022 and carried out by LUC. This was used to underpin the methodology and list of potential sites discussed in this study.

This study assesses the potential for carbon sequestration on the Council's landholdings. It uses geographical information system (GIS) analysis to identify areas of Council-owned land with potential for enhanced carbon sequestration. Key stakeholders from council services were consulted and their observations incorporated into the findings.

The study recommends appropriate strategic interventions and outlines any associated co-benefits. Follow-up work required to progress the strategic outcomes is highlighted, so that action may then be taken in line with the Council's climate change plans.

3. Approach

The approach to identifying the baseline carbon sequestration value and potential carbon sequestration value for council landholdings involved the following steps:

1. Data cleaning: Cleaning of the data to provide a single set of council assets on which to base the calculations of carbon sequestration potential. This involved removing any duplicate or inaccurate data, as well as merging different datasets into a single master dataset.

2. Identification of carbon sequestration values: Identification of carbon sequestration values applicable to the Ordnance Survey MasterMap (OSMM) land cover types. This was done by reviewing the current literature, drawing on the experience of the project team, and conducting a series of expert interviews.

3. Exclusion of manmade and hard surfaces: Manmade and hard surfaces were excluded from the analysis, as they do not have a significant carbon sequestration value. This was done by using a combination of GIS and manual methods.

4. Identification of biodiversity considerations: The biodiversity considerations that influence the suitability of OSMM land cover types to change were then identified. This included factors such as the presence of protected species and habitats, the potential for habitat fragmentation, and the impact of climate change.

5. Consultation with Moray Council service representatives: Moray Council service representatives were consulted to identify other constraints to implementing change, such as ownership type and property type. This was done through a series of workshops and interviews. Further sites were added/removed as appropriate.

6. Development of scenarios for change: Scenarios for change were then developed, based on the different constraints and considerations identified.

7. Development of an action plan and recommendations for next steps: Finally, an action plan was developed with recommendations for next steps.

3.1 Data limitations

The data on ownership type and property type held by the Council is not always up to date or readily accessible. This is due to property ownerships changing frequently, or records kept manually rather than digitally.

3.2 Biodiversity considerations

The land holding types (excluding hard surfaces and manmade) were evaluated, taking into account biodiversity considerations for Moray, and classified into three categories:

- **Suitable for change:** These land cover types are not subject to any significant constraints and can be changed without impacting biodiversity.

- **Variable:** These land cover types may be suitable for change, but there are some potential constraints that need to be considered. These constraints may include the presence of protected species, the potential for habitat fragmentation, or the impact of climate change.

- **Unsuitable:** These land cover types are not suitable for change due to significant biodiversity constraints. These constraints may include the presence of important species/habitats, or the potential for significant habitat loss.

3.3 Stakeholder workshops

Stakeholder workshops were held with representatives from different council services to identify key opportunities and constraints for future change on sites. The workshop participants shared their knowledge and expertise on a range of topics, including:

- The council's strategic priorities for climate change and biodiversity

- The current state of the council's assets

- The potential for change on sites

- The challenges and barriers to change

The workshop discussions helped to identify a number of key opportunities and constraints for future change on sites, and these were used in the development of the study findings.

3.4 Carbon sequestration values

The assigned carbon sequestration values are based on values identified in current literature. The values are expressed in tonnes of carbon dioxide equivalent per hectare per year (tCO2e/ha/yr).

5

4. Potential interventions

Moray Council's large and diverse landholdings present two valuable opportunities for carbon sequestration. These are tree and shrub planting and grassland enhancement.

Opportunities for such interventions exist across the council area, as shown in Figure 1.

Figure 1. Location of potential carbon sequestration projects within Moray Council landholdings.

4.1 Tree and shrub planting

Tree and shrub planting is a well-established method of carbon sequestration. Trees and shrubs absorb carbon dioxide from the atmosphere as they grow, and store this carbon for many years. Planting of trees and shrubs on suitable pockets of council land offers the greatest potential level of carbon sequestration.

This type of intervention affords wider environmental benefits including improved air quality, reduced noise pollution and enhanced biodiversity. Green spaces have been found to improve overall quality of life by providing a sense of place, promoting recreation, physical activity and reducing stress.

Significant consideration should be given to planting the right tree/shrub in the right place. This will determine how well the species grows and ensure that it sequesters an optimal level of carbon during its lifetime.

4.2 Grassland enhancement

Grasslands store a lot of carbon in the soil, referred to as soil organic carbon (SOC). The more plant diversity that there is in a grassland, the more SOC it can store. This is because different plants have different root systems, which help to break down organic matter and lock carbon in the soil.

Grassland can be enhanced through rewilding and the creation of wildflower growing spaces. This type of intervention will be particularly relevant in smaller areas of land, such as verges, or where larger-scale planting is unsuitable. There are many examples of such areas across Moray already.

Figure 2. Tyock Burn, Elgin.

There are several different types of enhanced grassland, each with its own unique characteristics, some of which already exist in Moray:

- **Short flowering lawn:** Created by replacing a traditional monoculture grass lawn with a seed mix or wildflower turves that favour low-growing and ground-hugging species. These species require less mowing than amenity grass, so they can help to reduce the amount of maintenance required.

- **Wet meadow:** Found in areas with damp or wet conditions that may periodically flood. Meadow species can thrive in these conditions as long as the water flow does not improve the nutrient-poor soil.

- **Hedgerow border:** Created by planting a seed mix specifically for hedgerows. These mixes can tolerate a degree of shading and can help to supplement the range of wildflowers already present in the hedgerow.

- **Woodland and shrub understorey:** Seeding or planting wildflowers in the understorey of a woodland or scrubland. This can help to enhance the existing ground cover and provide a more diverse habitat for wildlife.

- **Verges:** Involves planting wildflowers along roadsides and paths. This can help to reduce the amount of mowing required and can also provide a more attractive and wildlife-friendly alternative to traditional grass verges.

- **Pollinator meadow:** Created using a seed mix that favours high-nectar value species. These species are attractive to pollinators, such as bees and butterflies. Pollinator meadows can help to improve pollination rates and boost biodiversity.

- **Beetle bank:** A low mound that is seeded with tussock-forming native grasses. Beetle banks are cut irregularly to provide important overwintering habitat for invertebrates, small mammals, and reptiles.

Figure 4. Lossiemouth seafront, Lossiemouth.

4.3 Carbon sequestration potential

The study found that a total of 132.9 hectares of Moray Council landholdings are suitable for change to increase carbon sequestration. The total carbon sequestration value of this land is currently 70.5 tCO2e per year.

The potential carbon sequestration value of these landholdings, once changed, is significant. It is estimated that the maximum carbon sequestration value achievable is 1340.8 tCO2e per year. This is based on an assumption that all land suitable for change is subject to change.

The most common property types with suitable land for change are parks/playing fields (excluding sports pitches), primary and secondary schools (excluding sports pitches), and cemeteries. These property types account for 86% of the total area of land suitable for change. These sites have multiple uses, so any intervention will only affect part of the area and will be designed to work well with the intended use of the site.

Figure 3. Clovenside cemetery, Forres.

Table 1. Breakdown of current and potential carbon sequestration values within Moray Council landholdings by property type. Economic values attributed from BEIS.

Property type	Total area of habitat suitable for change (hectares)	Current carbon sequestration value (tCO2e)	Potential carbon sequestration value (tCO2e)	Annual economic value of potential carbon sequestration (2023 prices)
Agricultural	11.7	4.6	88.3	22,252
Car park	0.5	0	3.8	958
Cemeteries (10% of area)	3.9	1.6	29.4	7,409
Country park	21.8	8.6	164.6	41,479
Day centre	0.7	0.3	5.3	1,336
Depot	0.6	0.2	4.5	1,134
Harbour	1.9	0.7	14.3	3,604
Park/playing field (excluding sports pitches)	83	33.2	626.7	157,928
Play area	3.4	1.4	25.7	6,476
Primary and secondary school (excluding sports pitches)	33.9	13.5	255.9	64,487
Recycling/refuse tip	8.7	3.2	65.7	16,556
Sites (general)	7.5	3.0	56.6	14,263
Total	**132.9**	**70.5**	**1340.8**	**£271,483**

There are several statutory duties and policy drivers which support interventions in these areas, and these are summarised in Table 2.

Table 2. Relevant statutory duties and policy drivers.

Climate Change (Scotland) Act 2009	A statutory obligation on all public bodies to act to deliver on the national climate change targets, with 3 key duties: ● To contribute to reducing greenhouse gas emissions ● Adaptation: To help Moray adapt to the changing climate ● Sustainability: To act in a sustainable manner.
National Planning Framework 4	Gives significant consideration to carbon, climate change and biodiversity by incorporating the national climate change targets into the local planning system to promote sustainable development.
Nature Conservation (Scotland) Act 2004	A statutory duty on all public bodies in Scotland to further the conservation of biodiversity. Aims to protect and conserve biodiversity and natural habitats. Local authorities must consider biodiversity in their decision-making processes and promote the conservation of local habitats and species.
Nature Networks Framework	Scotland's public bodies have a statutory duty to facilitate the creation of Nature Networks and strengthen connections between them. This will help to deliver the Biodiversity Duties and support improved ecological connectivity.
Learning for Sustainability Action Plan	All school buildings, grounds, and policies should support Learning for Sustainability. Young people have an entitlement to outdoor learning. Improving school grounds for biodiversity and carbon sequestration will help schools deliver 'inspirational, relevant, and impactful learning related to sustainability'
Curriculum for Excellence through Outdoor Learning	Local authorities must "consider how to make the best use of school grounds and the outdoor spaces as an integral part of the learning environment ensuring that landscape design is at a par with building design".
Scotland's Learning Estate Strategy	This strategy states that "outdoor learning and the use of outdoor learning environments should be maximised".
Climate Ready School Grounds	Having Climate Ready School Grounds in Scotland will support efforts to meet the following strategies: ● Scottish Learning Estates Investment Programme and Learning Estates Action Plan ● Learning for Sustainability ● Climate Ready Scotland 2019-2024 ● United Nations Convention on the Rights of the Child School grounds cover a significant area of land and were not designed with climate impacts in mind. Children are vulnerable to extreme weather and the cooling and sheltering effect of vegetation and trees is important.

5. Recommendations and next steps

The opportunities discussed in this study would be most effectively implemented through the place-based Local Development Plan. To maximise potential impact, it is essential that these strategies are aligned and that they are implemented in collaboration with community councils and stakeholders across the Council. This will ensure that all relevant perspectives are considered and that the implemented opportunities are aligned with the Council's overall goals for carbon reduction, biodiversity conservation and sustainable land use. This strategic alignment would enable a place-based approach to reducing carbon, enhancing biodiversity, improving accessibility, and promoting the green economy.

Such an aligned strategy could form the basis for a multi-year funding bid to the North East Just Transition Fund and other potential funding sources including carbon finance and other socio-economic funding. Identification of funding sources for the potential land cover changes should be undertaken, including deadlines for applications and key requirements. This will need to be prioritised in order to secure funding to implement change within the next available planting season.

Table 3 summarises the steps that should be taken to progress the aspirations of this study.

Table 3.

	Lead	Requirements	Funding
Development of a business case, including economic appraisal of potential jobs and skills opportunities	?		
Secure funding from external sources and combine work with other delivery mechanisms	?		
Ecological appraisal of all priority sites	?		
Development of site specific proposals Community consultation/information sharing	?		
Development of an implementation programme	?		
Implementation and review	?		

5.1 Ecological appraisal of all priority sites

The potential list of sites (Appendix 1) should be subject to a preliminary ecological appraisal by a suitability qualified ecologist. Initially, this may be conducted by means of a site sample including a selection of land types. This will allow any ecological constraints to be identified, including the presence of habitats or species which would be impacted by future changes to land cover or management.

5.2 Development of site specific proposals

Following ecological appraisal, any amendments to the priority list of sites can be made and site specific proposals developed. These should include:

- Biodiversity considerations including habitat connectivity to enhance the habitat network and influence on species choice;

- Planting layout and design including impacts on key views and safety and sight lines for users of access routes;

- Opportunity to incorporate new access routes;

- Identification of areas where planting is likely to be retained in the long term and investment in higher sequestering habitats including tree planting may be justified; and

- Short term low cost management changes on any areas of land suitable for change but identified as unsuitable for planting.

- Community consultation/information sharing:

  - Identify opportunities for communities to participate in and fully benefit from enhancements;

  - Engage with communities about the best way to progress projects. This could be aligned with the LDP engagement process;

  - Consultation materials should be prepared to help communicate to the public the likely upcoming changes to council assets. This communication should set out the reasoning behind the change and benefits from the proposed land cover change.

5.3 Development of an implementation programme

Based on the findings from ecological appraisal, sites should be prioritised, any timescales for community consultation should be programmed in, alongside key dates for funding applications. Where appropriate community involvement in implementation should be sought to support awareness, understanding and ownership of the change.

5.4 Implementation and review

Implementation should be carried out during the next available planting season after ecological appraisal is complete. A record should be made of any key challenges or opportunities associated with implementing change in any of the sites to inform future work stages and to enable peer-learning within the public sector.

Additional Considerations

5.5 Consideration to be given to school estate

The school estate has nearly 24 hectares of land that could be suitable for change and is on the priority list. However, the stakeholder consultation found that future redevelopment or expansion of the school estate would impact on the land available for change for carbon sequestration. The Council should ensure that carbon sequestration is a consideration in future landscaping and planting requirements for new school development, and that all potential school estate sites are included within the list of priority sites.

5.6 Handling of lower priority sites

Building on any key learning points from the approach to implementing change at the priority sites, all remaining areas identified as having land cover suitable for change should be prioritised. There should then be a second round of ecological appraisal, site prioritisation, community consultation and implementation.

The following property types are considered to be lower priority for immediate action, as they require more nuanced approaches:

- **Cemeteries:** A sensitive approach is required to identify areas within cemeteries where changes can be made while still maintaining the functionality of the sites for burial purposes.

- **Council owned development sites:** The likely timescale before future development on these sites will need to be considered, as well as how the change in land cover will be reflected in carbon sequestration values when the site is cleared for development.

- **Land around council housing:** These are smaller parcels of land which will require close community engagement prior to progressing enhancements.

- **Leased in land:** This includes parts of Findhorn Bay Nature Reserve, two primary schools, Nether Dallachy Landfill site, a park/playing field, and a play area.

- **Leased out sites:** Only two priority areas are leased out. One of these is greater than 1 hectare, which is 3.32 hectares at Newtyle landfill site in Forres. The Council could review the lease end date for this site and identify any opportunity for future change.

- **Common good land:** A total of 28 hectares of common good land is identified as suitable for enhancement. Approximately 23.5 hectares of this land, spread across ten sites, is greater than 1 hectare. Common good land property types include parks/playing fields, agricultural land, country park, development site, play area, sites, and a depot. If any proposed improvements would lead to change of use of common good land then this would be subject to a statutory public consultation under S104 of the Community Empowerment (Scotland) Act 2015 to ensure community support for the proposals.

- **Public trust land:** A total of 21 hectares of land suitable for change is public trust land across three sites, all parks/playing fields. The Council should develop and consult on an appropriate justification for the use of public trust land for carbon sequestration purposes.

Appendix 1: List of potential sites

Reference	Habitat area (ha)	Ward	Type	Community	Address
02/01024/ASS	10.22	Elgin City North	Parks / Playing Field	Elgin	Cooper Park, King Street, Elgin
M/AL/R/15/LON	9.48	Heldon	Agricultural	Alves	Land N of Alves, Alves
03/01245/ASS	8.03	Forres	Parks / Playing Field	Forres	Grant Park, High Street, Forres
02/00303/ASS	6.75	Fochabers Lhanbryde	Refuse Tip	Innes	Kirkhill Landfill Site, Elgin
02/01071/ASS	4.97	Speyside Glenlivet	Country Park	Speyside	Speyside Way Aberlour
03/01248/ASS	4.96	Elgin City North	Parks / Playing Field	Elgin	Deanshaugh Fields, Lesmurdie Road, Elgin
12/01712/ASS	3.73	Elgin City North	Sites (General)	Elgin	Site Of, Chanonry Industrial Estate, Elgin, IV30 6ND
03/01309/ASS	2.92	Forres	Parks / Playing Field	Forres	Playing Field, St Leonards Road, Forres
03/01243/ASS	2.78	Keith And Cullen	Parks / Playing Field	Keith	Fife Park Fife Street Keith
11/01678/ASS	2.76	Fochabers Lhanbryde	Parks / Playing Field	Innes	Playing Field, Lhanbryde Village Hall, Robertson Road, Lhanbryde IV30 8QQ
21/01937/ASS	2.74	Heldon And Laich	Secondary School	Lossiemouth	Lossiemouth High School Coulardbank Road Lossiemouth Moray IV31 6JU
03/01275/ASS	2.70	Elgin City North	Parks / Playing Field	Elgin	Park Brodie Drive Elgin

Reference	Habitat area (ha)	Ward	Type	Community	Address
17/01872/ASS	2.40	Forres	Agricultural	Forres	Pumping Station Adjacent A96 Findhorn/Pilmuir Forres
03/01242/ASS	2.38	Keith And Cullen	Parks / Playing Field	Keith	St Rufus Park, Seafield Avenue, Keith
02/00228/ASS	2.32	Fochabers Lhanbryde	Country Park	Heldon	Country Park, Millbuies
02/00437/ASS	2.18	Forres	Secondary School	Forres	Forres Academy, Burdsyard Road, Forres IV36 1FG
03/01342/ASS	2.13	Keith And Cullen	Parks / Playing Field	Portknockie	McLeod Park, Portknockie
03/01239/ASS	2.04	Buckie	Parks / Playing Field	Buckie & District	Merson Park, Barhill Road, Buckie
08/01611/ASS	1.97	Elgin City South	Parks / Playing Field	Elgin	Football Pitches, Thornhill Road, Elgin
03/01246/ASS	1.73	Speyside Glenlivet	Parks / Playing Field	Speyside	May Park, Rothes AB38 7AG
02/00461/ASS	1.68	Forres	Primary School	Forres	Applegrove Primary School, Orchard Road, Forres IV36 1PJ
02/00489/ASS	1.67	Speyside Glenlivet	Primary School	Dufftown & District	Mortlach Primary School, York Street, Dufftown AB55 4AU
02/00443/ASS	1.65	Keith And Cullen	Primary School	Cullen & Deskford	Cullen Primary School, Old Church Road, Cullen AB56 4UZ
03/01345/ASS	1.65	Keith And Cullen	Parks / Playing Field	Strathisla	King George V Playing Field, Rothiemay

Reference	Habitat area (ha)	Ward	Type	Community	Address
02/01158/ASS	1.58	Speyside Glenlivet	Parks / Playing Field	Speyside	Alice Littler Park, Broomfield Square, Aberlour
03/01324/ASS	1.52	Fochabers Lhanbryde	Parks / Playing Field	Innes	Playing Field, Glenesk Road, Lhanbryde
19/01906/ASS	1.38	Fochabers Lhanbryde	Primary School	Innes	Linkwood Primary School Thistle Drive Elgin Moray IV30 8AS
02/00476/ASS	1.37	Heldon And Laich	Primary School	Lossiemouth	Hythehill Primary School, Hythehill, Lossiemouth IV31 6RF
02/00984/ASS	1.29	Buckie	Parks / Playing Field	Buckie & District	Buckpool Harbour Park, Buckpool, Buckie
02/00480/ASS	1.26	Fochabers Lhanbryde	Primary School	Innes	Mosstodloch Primary School, Garmouth Road, Mosstodloch IV32 7JB
02/00453/ASS	1.23	Elgin City North	Primary School	Elgin	Seafield Primary School, Deanshaugh Terrace, Elgin IV30 4ES
02/00347/ASS	1.17	Buckie	Parks / Playing Field	Buckie & District	Ian Johnston Park, Midmar Street, Buckie
02/00478/ASS	1.16	Fochabers Lhanbryde	Primary School	Innes	Lhanbryde Primary School, Garmouth Road, Lhanbryde IV30 8PD
02/00445/ASS	1.12	Buckie	Primary School	Buckie & District	Millbank Primary School, Mcwilliam Crescent, Buckie AB56 1LU

Reference	Habitat area (ha)	Ward	Type	Community	Address
03/01321/ASS	1.09	Fochabers Lhanbryde	Parks / Playing Field	Innes	Park Beach Road Kingston
02/01150/ASS	1.09	Fochabers Lhanbryde	Parks / Playing Field	Innes	Stynie Park, Stynie Road, Mosstodloch
02/00455/ASS	1.08	Elgin City South	Primary School	Elgin	Greenwards Primary School, Edgar Road, Elgin IV30 6UQ
03/01258/ASS	1.08	Buckie	Parks / Playing Field	Buckie & District	Portessie Playing Field, School Road, Buckie
02/00466/ASS	1.07	Forres	Primary School	Forres	Pilmuir Primary School, Pilmuir Road, Forres IV36 1HD
03/01315/ASS	1.07	Keith And Cullen	Parks / Playing Field	Keith	Cuthil Park, Keith
02/00450/ASS	1.05	Elgin City North	Primary School	Elgin	Bishopmill Primary School Morriston Road Elgin IV30 4DY
02/01034/ASS	1.04	Speyside Glenlivet	Primary School	Glenlivet	Tomintoul Primary School, Main Street, Tomintoul AB37 9HA
02/00464/ASS	0.98	Forres	Primary School	Findhorn & Kinloss	Kinloss Primary School, Main Road, Kinloss IV36 3SX
03/01277/ASS	0.97	Elgin City South	Parks / Playing Field	Elgin	Ladyhill Monument Gardens High Street Elgin
02/00349/ASS	0.95	Buckie	Parks / Playing Field	Buckie & District	Rose Garden, Queen Street, Buckie
03/01255/ASS	0.95	Buckie	Parks / Playing Field	Buckie & District	Burn Of Buckie, Burnside Court, Buckie

Reference	Habitat area (ha)	Ward	Type	Community	Address
02/00457/ASS	0.89	Elgin City South	Primary School	Elgin	New Elgin Primary School, Bezack Street, Elgin IV30 6DP
02/01063/ASS	0.85	Heldon And Laich	Parks / Playing Field	Heldon	Woodland Park, Brumley Brae, Elgin
02/00038/ASS	0.85	Keith And Cullen	Agricultural	Keith	Field East Of Strathmill Distillery, Keith
03/01274/ASS	0.78	Elgin City South	Parks / Playing Field	Elgin	Bilbohall Park, Elgin
02/00458/ASS	0.78	Heldon And Laich	Primary School	Heldon	Alves Primary School, Main Road, Alves, Elgin IV30 8UR
03/01320/ASS	0.78	Keith And Cullen	Parks / Playing Field	Keith	Horse Market Leas, Dunnyduff Road, Keith
02/00444/ASS	0.76	Buckie	Primary School	Findochty & District	Findochty Primary School, Burnside Street, Findochty AB56 4QW
03/01337/ASS	0.75	Fochabers Lhanbryde	Parks / Playing Field	Innes	Playing Field Stynie Park Stynie Road Mosstodloch
03/01329/ASS	0.74	Heldon And Laich	Parks / Playing Field	Lossiemouth	James Square Park, Queen Street, Lossiemouth
02/00463/ASS	0.73	Forres	Primary School	Dyke Landward	Dyke Primary School, Dyke, Forres IV36 2TF
03/01290/ASS	0.70	Buckie	Parks / Playing Field	Findochty & District	Playing Field, Castle Street, Findochty
02/00472/ASS	0.66	Keith And Cullen	Primary School	Strathisla	Rothiemay Primary School, Main Street, Rothiemay AB54 7LT

Reference	Habitat area (ha)	Ward	Type	Community	Address
03/01279/ASS	0.65	Elgin City South	Parks / Playing Field	Elgin	Mart Park, New Elgin Road, Elgin
02/00488/ASS	0.60	Speyside Glenlivet	Primary School	Speyside	Knockando Primary School, Knockando AB38 7RY
10/01654/ASS	0.59	Buckie	Agricultural	Buckie & District	Land At Barhill Cemetery, Barhill Road, Buckie
03/01340/ASS	0.58	Fochabers Lhanbryde	Parks / Playing Field	Lennox	Playing Field, Station Road, Portgordon
02/00479/ASS	0.56	Fochabers Lhanbryde	Primary School	Lennox	Milnes Primary School, High Street, Fochabers IV32 7ER
03/01347/ASS	0.56	Fochabers Lhanbryde	Parks / Playing Field	Innes	Playing Field, Main Street, Urquhart
03/01276/ASS	0.54	Elgin City North	Parks / Playing Field	Elgin	Playing Field, Hamilton Crescent, Elgin
03/01298/ASS	0.52	Forres	Parks / Playing Field	Forres	Mosset Park, Gordon Street, Forres
03/01297/ASS	0.5	Forres	Parks / Playing Field	Forres	Fleurs Park, Fleurs Place, Forres
03/01299/ASS	0.46	Forres	Parks / Playing Field	Forres	Market Green, Forres
03/01266/ASS	0.41	Speyside Glenlivet	Parks / Playing Field	Strathisla	Drummuir Park, Drummuir
12/01701/ASS	0.4	Keith And Cullen	Primary School	Keith	Keith Primary School, School Road, Keith AB55 5GS
03/01280/ASS	0.39	Elgin City North	Parks / Playing Field	Elgin	Brewery Park, King Street, Elgin

Reference	Habitat area (ha)	Ward	Type	Community	Address
03/01237/ASS	0.38	Heldon And Laich	Parks / Playing Field	Lossiemouth	Station Park, Pitgaveny Street, Lossiemouth
02/00483/ASS	0.37	Speyside Glenlivet	Primary School	Speyside	Craigellachie Primary School, John Street, Craigellachie AB38 9SW
02/00452/ASS	0.36	Elgin City South	Primary School	Elgin	West End Primary School, Mayne Road, Elgin IV30 1PA
02/00465/ASS	0.36	Forres	Primary School	Finderne	Logie Primary School, Dunphail IV36 2QG
02/00487/ASS	0.35	Speyside Glenlivet	Primary School	Glenlivet	Inveravon Primary School, Ballindalloch AB37 9BA
03/01314/ASS	0.34	Keith And Cullen	Parks / Playing Field	Keith	Scotscraig Gardens, St Rufus Park, Seafield Avenue, Keith
03/01295/ASS	0.33	Forres	Parks / Playing Field	Forres	Califer Park, Califer Road, Forres
03/01278/ASS	0.3	Elgin City North	Parks / Playing Field	Elgin	Playing Field, Newmill Road, Elgin
03/01327/ASS	0.28	Heldon And Laich	Parks / Playing Field	Lossiemouth	Playing Field, Commerce Street, Lossiemouth
02/00447/ASS	0.27	Fochabers Lhanbryde	Primary School	Lennox	Portgordon Primary School Richmond Terrace Portgordon AB56 5RA
05/01493/ASS	0.27	Forres	Parks / Playing Field	Forres	Scotties Park, Bridge Street, Forres

Reference	Habitat area (ha)	Ward	Type	Community	Address
03/01328/ASS	0.27	Heldon And Laich	Parks / Playing Field	Lossiemouth	Former Quarry Site Dean Terrace Lossiemouth
03/01233/ASS	0.25	Fochabers Lhanbryde	Parks / Playing Field	Lennox	Bi Centennial Park, High Street, Fochabers
03/01300/ASS	0.25	Forres	Parks / Playing Field	Forres	Applegrove Garden, Sanquhar Road, Forres
14/01781/ASS	0.24	Fochabers Lhanbryde	Agricultural	Heldon	Field Fogwatt Elgin
02/00485/ASS	0.18	Speyside Glenlivet	Primary School	Glenlivet	Glenlivet Primary School, Glenlivet AB37 9DA
02/00448/ASS	0.17	Keith And Cullen	Primary School	Portknockie	Portknockie Primary School King Edward Terrace Portknockie AB56 4NX
02/00481/ASS	0.17	Speyside Glenlivet	Primary School	Speyside	Aberlour Primary School, Mary Avenue, Aberlour AB38 9PN
02/00490/ASS	0.15	Speyside Glenlivet	Primary School	Speyside	Rothes Primary School, Green Street, Rothes AB38 7BD
02/01032/ASS	0.14	Buckie	Primary School	Buckie & District	Cluny Primary School, South Pringle Street, Buckie AB56 1PX
02/00473/ASS	0.13	Keith And Cullen	Primary School	Keith	St Thomas Primary School, Chapel Street, Keith AB55 5AL

Moray Council

Natural Capital Investment and Carbon Offsetting Study
Final Report

Final Report
Prepared by LUC
August 2023

Moray Council

Natural Capital Investment and Carbon Offsetting Study
Final Report

Project Number
12348b

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Contents

Chapter 1
Introduction and Methodology

1.1 As part of the production of a Just Transition Masterplan for Moray Council, LUC has been appointed to produce a report on carbon offsetting and natural capital enhancement opportunities and delivery mechanisms.

1.2 Natural Capital is the environmental resources, habitats and ecosystems from which a flow of social, environmental and economic benefits to people can be generated. Natural capital includes; air, water, minerals, soil, coast, woodland, grassland, heathland and farmland[1].

1.3 Investing in the quality and expansion of natural capital assets can therefore realise significant benefits for humans and help to tackle the twin crises for climate and nature.

1.4 The scale of change required to meet these challenges is significant and will require a skilled workforce to deliver investments and substantial funding. This is a developing area and delivery mechanisms for natural capital investments are still emerging, although the evidence base is growing.

1.5 The scope for this work was split into four stages covering the following:

1. A strategic natural capital assessment which identifies opportunities for investment, including a high-level benefit assessment.

2. An assessment of the skills requirements for undertaking the opportunities identified.

3. Stakeholder engagement on natural capital delivery mechanisms, including developer obligations, developer contributions, payments for ecosystem services (including carbon markets) and grant funding.

4. Provide an overview of the carbon sequestration role of green walls and green roofs. This has been provided as a separate report.

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[1] NatureScot website – Natural Capital

1.6 This report presents the findings from this work and includes a series of recommendations for the next steps Moray Council should take in identifying the most appropriate delivery mechanism for investment in their natural capital assets and realising the range of benefits this would bring. The remainder of the report is structured as follows:

- Identification of high-level natural capital investment opportunity areas in Moray and an overview of their potential benefits, covering the following:

  - Peatland restoration;

  - River flood risk and water quality management;

  - Coastal flood risk management;

  - Woodland enhancement; and

  - Agricultural land enhancement.

- Identification of potential supporting investment opportunities which could maximise the benefits from investing in natural capital and their potential benefits. These include access and tourism opportunities.

- Summary of skills and jobs typically required for the delivery of each of the investments identified.

- An overview of the key funding and delivery mechanisms for natural capital and carbon-offsetting projects.

- A series of case studies which demonstrate how these mechanisms have been used in practice to delivery carbon-offsetting and natural capital investment projects, including a summary of challenges to their implementation.

- A detailed list of the grant funds available to support the delivery of all the investments identified.

- Recommendations and next steps which Moray Council should take based on an assessment of delivery mechanisms and case studies, their appropriateness to Moray's context and the investment opportunities identified.

1.7 This Report also seeks to provide an evidence base to inform Moray Council's approach to the implementation of policy obligations on climate mitigation and biodiversity enhancement established through National Planning Framework (NPF) 4. In particular the Council is seeking to respond to the aspirations of NPF 4 Policy 2, 'Climate Mitigation and Adaption' which seeks to *"encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change"* and Policy 3, 'Biodiversity' which aims to *"protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks"*. Under these policies, it is expected that LDP spatial strategies should be *"designed to reduce, minimise or avoid greenhouse gas emissions"* and that LDP's in general 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"*.

Chapter 2
Natural Capital Investment Opportunities

2.1 This chapter provides a high-level natural capital assessment of Moray and identifies strategic opportunities for future investment. It covers the following strategic natural capital opportunities:

- Peatland restoration;

- River flood risk and water quality management;

- Coastal flood risk management;

- Woodland enhancement; and

- Agricultural land enhancement.

2.2 Each section provides:

- Background on the natural capital investment opportunity;

- The approach taken to selecting priority areas;

- A series of priority areas for investment; and

- An overview of the potential benefits which could be realised from investment.

Methodology and Limitations

2.3 The priority areas identified in this section are strategic and show possible investments which could be made. They are based on a rapid review of high-level GIS data and aerial photography. Should Moray Council take these projects forward each would require a site-specific survey and other technical studies such as environmental impact assessments (EIA) and habitat regulations assessment (HRA) as necessary.

2.4 The opportunity areas have not considered land ownership. Landowner engagement and community engagement will be required as per the recommendations provided at the end of the report in **Chapter 10**.

2.5 The identification of opportunity areas has also not included a full assessment of other initiatives currently taking place in Moray. Although some overlaps have been identified, and where so, opportunities to streamline actions have been suggested, it is possible that some of the opportunities have already been identified and are being progressed by others. When selected priority areas to take forward, Moray Council should carry out detailed research on other initiatives happening in that area.

Peatland Restoration

Context

2.6 Peatlands store significant amounts of carbon and have an important net cooling effect on climate. Healthy peatlands also support a range of threatened priority species and habitats and help to reduce flood risk by slowing down water flow. Degraded peatlands are a net source of carbon emissions, and much of Scotland's peatland is degraded. Therefore, the restoration and protection of peatland is a vital part of tackling climate change. There are extensive areas of peatland in Moray, particularly in the centre and south of the Council area (**Figure 2.1**).

Investment Opportunities

2.7 Scotland's Soils 2016 Carbon and Peatland map shows the distribution of carbon and peatland classes across Scotland. Peatland and carbon rich soils in Scotland are classified by the likely presence of peat soils in land. Class 1 and 2 peatlands are considered to be nationally important areas that should be protected and restored (see **Figure 2.1**).

- Class 1 areas are considered to be of high conservation value.
- Class 2 areas are considered to have higher restoration value.

2.8 Methods of peatland restoration include:

- Forest to bog restoration: Requires removal of the commercial plantation and blocking of drainage ditches to 're-wet' the bog.

- Ditch blocking in open ground: Aims to rewet peatland by raising the water table, helping to restore peatland function.

- Hag reprofiling: A peat hag is an eroding face or cliff of bare peat which dries out and releases carbon. During hag reprofiling the turf is removed and the hag reprofiled to a shallow slope. The turf is replaced and any gaps are filled in.

- Conservation grazing: A reduction in grazing pressure can lead to increased vegetation cover (both heather and sphagnum), which is compatible with blanket bog function, in terms of carbon sequestration/peat formation.

2.9 Different methods of restoration will be appropriate to different locations, depending on the character of the area and previous land management impacts.

2.10 An initial selection of strategic potential areas for peatland restoration in Moray was based on the identification of areas of class 1 and t peatland from GIS data and further analysis through the study of aerial photography where areas of class one peatland appear to be visibly hagged. The dates of the aerial photography ranged from 2019-2022. The following strategic areas have been identified as priorities for restoration (illustrated on **Figure 2.2**).

Priority Area 1
2.11 Priority Area 1 is focused on a large area of primarily Class 1 peatland. The area is located across the undulating uplands which lie between the Moray Council boundary/Water of Caiplich in the north, and River Avon in the south.

2.12 An additional, smaller area of peatland to the north-east near Carn na Ruabraich is also comprised of Class 1 peatland.

2.13 In both cases, aerial photography indicates that the peat is hagged in this area and would benefit from ditch blocking and reprofiling.

Priority Areas 2-5
2.14 The aerial photography for Priority Areas 2-5 indicates that the peat is hagged and would benefit from ditch blocking and reprofiling.

2.15 Priority Area 2 is focused on an area of primarily Class 1 peatland. The area is located to the east of Dalestie, along the boundary of the Moray Council boundary. It extends across the slopes of Tolm Buirich (693m AOD) and Craig Veann (711m AOD).

2.16 Priority Area 3 is focused on an area of Class 1 peatland. The area is located to the east of Tomintoul, and immediately west of the summit of Tom Trumper (582m AOD).

2.17 Priority Area 4 is focused on a large area of primarily Class 1 peatland. The area is located across the undulating uplands which lie between the Local Authority boundary in the south, and Blackwater Forest Wind Farm in the north.

2.18 Priority Area 5 is focused on a large area of primarily Class 1 peatland around Ben Rinnes (840m AOD).

Priority Area 6

2.19 Priority Area 6 is an area of Class 1 and Class 2 peatland which has forestry planted on it in some areas. This area would benefit from forest to bog restoration and blocking of drainage ditches to 're-wet' the bog.

Benefits

2.20 The restoration of peatland areas will provide many benefits, including reducing greenhouse gas emissions, increasing carbon storage, improving biodiversity, water quality, acting as natural flood management, enhancing landscape character, cultural heritage, and people's health and wellbeing.

2.21 Of particular note are the ecological benefits peatland restoration would have with the sites selected spanning several designated sites. This includes the Cairngorms Massif Special Protection Area (SPA) where species of protected breeding birds such as the dotterel would benefit[2], the Cairngorms Special Area of Conservation (SAC) where the large blanket bog habitat was a primary reason for selection and is in an unfavourable condition[3], Eastern Cairngorms Site of Special Scientific Interest (SSSI) which overlaps with the SAC, River Spey SAC which is comprised of 11% bog and marsh habitat[4]. In the Ladder Hills SSSI and SAC blanket bog restoration is a conservation priority and would support priority bird species such as hen harrier, merlin and golden plover, golden eagle, peregrine and short-eared owl[5].

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[2] NatureScot website – Cairngorms SPA
[3] JNCC website – Cairngorms – Designated Special Area of Conservation (SAC)

[4] JNCC website – River Spey – Designated Special Area of Conservation (SAC)
[5] JNCC website – Ladder Hills – Designated Special Area of Conservation (SAC)

LUC I 5

Moray Just Transition Masterplan -
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Moray Council

Figure 2.1: Carbon and Peatland Soil Classification
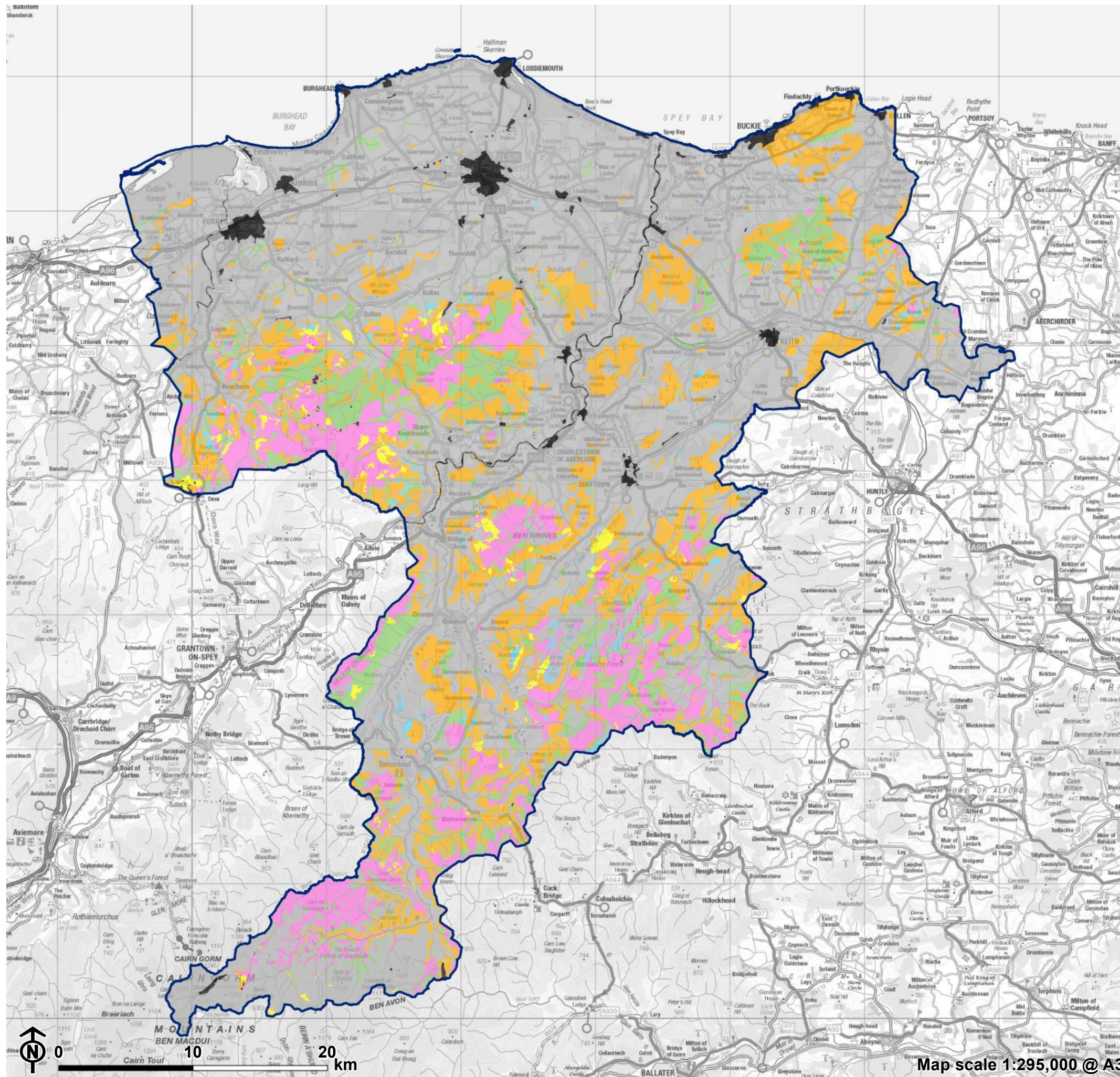
Moray boundary

Carbon and Peatland 2016

- Class 1
- Class 2
- Class 3
- Class 4
- Class 5
- Mineral soil
- Non-soil

Map scale 1:295,000 @ A3

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CB:JB EB:bournazel_j LUC912348B_r1_Carbon_Peatland_Soil_Classif_A3L 25/04/2023
Source: OS, Moray Council, NatureScot

Moray Just Transition Masterplan - Carbon Offset Study
Moray Council

Figure 2.2: Opportunity Areas: Peatland Restoration
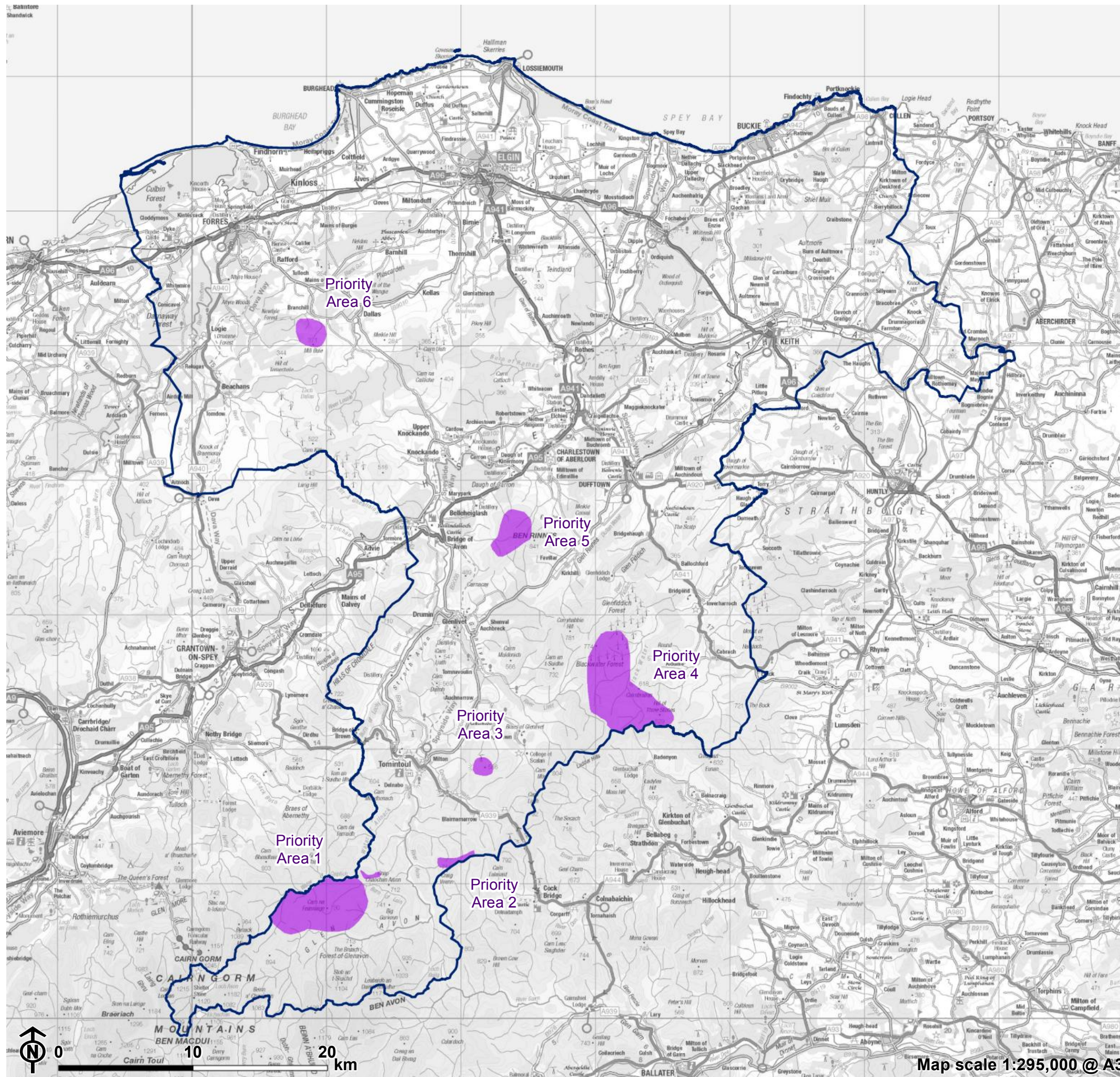
Moray boundary
Peatland restoration opportunity

Map scale 1:295,000 @ A3

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CB:JB EB:bournazel_j LUC 12348B_r1_Opp_Areas_Peatland_A3L 26/04/2023
Source: OS, Moray Council, LUC
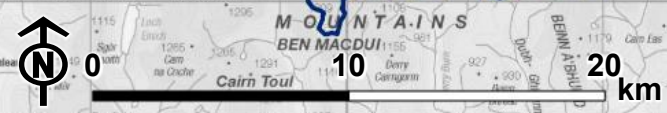
River Flood Risk and Water Quality

Context

2.22 There are several watercourses within Moray, the most significant are the River Spey, River Lossie, and River Findhorn. The River Spey has the largest catchment, covering an area nearly 3000km^2 with 36,500km of streams. The catchments of the River Lossie and River Findhorn are 270km^2 and 114km^2, respectively.

2.23 Flood risk across Scotland is increasing as a result of climate change impacts such as extreme weather and sea level rise. It is therefore important to try and minimise the frequency and severity of flood events in the future.

2.24 Water quality is influenced by many factors including land use, regulated and unregulated discharges, and water abstraction for agriculture and industry which can reduce dilution of pollutants. These activities have impacts on other water users and biodiversity.

Investment Opportunities

2.25 The SEPA Flood Extent data (**Figure 2.3**) shows that many rivers within Moray have a 'high likelihood' of flooding, including the River Spey, River Lossie and River Findhorn. As such, more flood management techniques are necessary to mitigate and manage flood risk, including forms of natural flood management. Some flood alleviation schemes have already been undertaken by Moray Council including at Dallas, Forres, Lhanbryde, Rothes and Newmill and another at Elgin is currently underway.

2.26 The SEPA River Classifications data identifies the quality of watercourses within Moray. Generally, the quality of watercourses across Moray is satisfactory, with the majority of watercourses having 'moderate', 'good' or 'high' status (**Figure 2.4**). However, sections of the River Lossie near Elgin have 'bad' status. In addition, several watercourses have 'poor' status (parts of the River Lossie, Burn of Linkwood, Longmorn Burn, Burn of Rothes, Burn of Mosset and Altyre Burn).

2.27 Many of the natural flood management methods for minimising flood risk and improving water quality of watercourses are interlinked. Such methods include:

- Runoff reduction e.g. woodland and riparian woodland planting and upland drainage blocking.

- Floodplain storage e.g. floodplain restoration and floodplain and riparian woodlands.

- Sediment management e.g. sediment traps and bank restoration.

- River re-profiling and channel morphology e.g. meander restoration.

- Restoring natural features e.g. wetlands and woodlands.

- Improving agricultural practices to reduce run-off of chemicals and fertilizers and minimise soil erosion (primarily for improvements to water quality).

Priority Areas

2.28 There is high flood risk along several of the rivers in Moray, and it is recommended that detailed analysis and research is carried out to identify specific areas to be prioritised for the implementation of natural flood management measures. As a starting point, the following strategic areas at risk of river flooding have been identified as potential priority areas (Priority Areas 1-3).

2.29 With the exception of the River Lossie which has sections of 'bad' and 'poor' status, generally the water quality status of rivers is classed as moderate or higher. SEPA data on water quality along watercourses is used to identify areas where improvements could be made. It is recommended that all rivers with poor or bad status are improved. However, for this study the key strategic priority is focused on the river sections with 'bad' status (see Priority Area 4).

2.30 All priority areas are mapped in **Figure 2.5**.

Priority Areas 1-3
2.31 River flood data indicates that the following Priority Areas 1-3 are in areas identified as being at high risk of river flooding. In these areas there is an opportunity for additional riparian planting, along sections of these rivers where this is lacking.

2.32 Priority Area 1 is focused on an area of land to the north-west of Forres. This Priority Area comprises the lower reaches of the River Findhorn and Muckle Burn. The River Findhorn watershed initiative, led by the Findhorn Nairn and Lossie Rivers Trust, is currently seeking to

carry out natural flood management measures, carbon sequestration and habitat restoration and is looking to create a partnership to facilitate this. Moray Council should ensure its involvement within this partnership as a mechanism to deliver this priority.

2.33 Priority Area 2 is focused on an area of land to the north-east of Elgin. This Priority Area comprises the lower reaches of the River Lossie as it flows from Elgin to the Moray Firth. This area is within the Elgin Flood Alleviation Scheme (FAS) area, which is one of the largest FAS in Scotland. The scheme affords protection to 860 residential and 270 commercial properties in Elgin, providing a current-day standard of defence of 1 in 200 years[6]. The scheme includes a series of set-back flood embankments and flood walls, a new flood relief channel opposite the Cathedral, a new diversion channel to move Tyock confluence, approximately 1.5 km downstream, and two localised defences in area downstream of Elgin constructed. Beyond the works already planned there is potential to consider other natural flood management techniques such as riparian woodland planting and to re-profile straighter sections of the river, by restoring meanders.

2.34 Priority Area 3 is focused along a long stretch of the River Spey between Craigellachie and Kingston. Opportunities include enhancing riparian planting, removal of obstacles in the water, and river bank restoration. The Spey Catchment Initiative[7], led by a steering group of representatives from partner organisations, is already undertaking some of the measures in this area including floodplain restoration and riparian woodland creation. Moray Council is already a member of the partnership and should continue to work with the partnership to expand the range of work in the area and maximise the benefits.

Priority Area 4
2.35 Priority Area 4 is focused along a stretch of the River Lossie between Cloddach and Elgin. This Priority Area incorporates a section of the river which is identified as having 'bad' status in terms of water quality. This is the only watercourse in Moray which has 'bad' status. Opportunities should therefore be sought to improve the status and quality of this section of the river. Opportunities include restoring river meanders along the sections which have straightened, planting riparian woodland to slow surface water run-off from nearby land, and engagement with the agricultural and mineral extraction industry to minimise water pollution.

Benefits

2.36 The use of natural flood management measures along these stretches of rivers will provide a multitude of benefits, including in relation to biodiversity, water quality, climate change, and people's health and wellbeing.

2.37 Restoring and enhancing habitats along the rivers, such as wetlands and riparian planting, will help to support a greater range of species and increase connectivity across the ecological network. Restoration works to the profile of the river such as meander and bank restoration, may also provide additional benefits and diversity by altering the water flow such as slowing it down at meanders. This may allow certain species such as salmon to thrive.

2.38 Furthermore, restoration of the riverbanks may improve water quality by reducing sedimentation within the river. Likewise, wetlands and riparian woodland may help to filter surface water run-off, reducing the amount of pollutants entering the watercourse. These improvements would be further enhanced through improved operational practices including a reduction in the use of fertilisers and exploration of agro-ecological measures across the agricultural industry.

2.39 Implementing the natural flood management techniques will provide benefits in relation to climate change, by increasing the resilience of ecosystems, making them more resistant to the changing climate. Additionally, restoration and enhancements of features such as wetlands and riparian woodland will help to increase the amount of carbon sequestered and stored, thereby removing carbon from the atmosphere.

2.40 Improving the overall condition of river corridors, such as through planting riparian woodland and restoring wetland habitats, may encourage more people to use the area recreationally, and footpaths can be integrated into the planting. This will have potential benefits for health and wellbeing. Carrying out the investments and the ongoing maintenance of them will provide opportunities for local business and employment, particularly in the land management and woodland sectors.

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[6] Moray Council website – Our Flood Alleviation Schemes – Elgin

[7] Spey Catchment Initiative website

Coastal Flood Risk

Context

2.41 The coastline of Moray extends along part of the Moray Firth and the North Sea.

2.42 Flood risk across Scotland is increasing because of climate change impacts such as extreme weather and sea level rise. It is therefore important to try and minimise the frequency and severity of flood events in the future. The vulnerability of the coast to these threats varies according to the physical characteristics of rocky or sandy shorelines. Between Cullen and Portgordon and Lossiemouth and Burghead, the Moray coastline is 'hard', comprising low cliffs and narrow, fringing rock platforms. Elsewhere, the coastline is considered to be 'soft' comprising depositional landforms such as sandy beaches, backed by low, raised shorelines and sand dune systems[8]. The low lying sandy coastal areas are more vulnerable.

Investment Opportunities

2.43 SEPA Flood Extent data shows that the entire coastline of Moray, and localised inland locations, have a 'high likelihood' of coastal flooding (**Figure 2.3**). As such, more coastal flood management techniques are necessary to mitigate and manage coastal flood risk, including forms of natural flood management. Natural flood management for coastal areas involves a number of methods including:

- Estuarine surge attenuation such as restoration of intertidal habitats including wetlands, mudflats and saltmarshes; and

- Wave energy dissipation such as sand dune and saltmarsh restoration.

Priority Areas

2.44 Due to the extent of high coastal flood risk across Moray, detailed analysis and research should be carried out to identify specific areas to be prioritised for the implementation of natural flood management measures. However, as a starting point, the following strategic areas at risk

of coastal flooding have been identified as potential priority areas (Priority Areas 1-3). These are illustrated in **Figure 2.5**.

Priority Area 1

2.45 Priority Area 1 is focused on an area of land to the south-east of Lossiemouth. This Priority Area comprises the lower reaches of the River Lossie and its floodplains, and is in an area identified as being at high risk of coastal flooding. Opportunities to create new tidal habitats should be sought in this area, as should sand dune restoration along the coastline.

Priority Area 2

2.46 Priority Area 2 is focused on the area comprising Findhorn Bay. This enclosed estuary is identified as being at high risk of coastal flooding. Opportunities should be sought to create new and improve existing areas comprising mudflats and salt marshes.

Priority Area 3

2.47 Priority Area 3 is focused on the intertidal area to the north-west of Culbin Forest. This area is identified as being at high risk of coastal flooding, and opportunities should be sought to create new tidal habitats and to enhance and restore sand dunes.

Priority Area 4

2.48 Priority Area 4 is focused on the Spey estuary. This Priority Area comprises the lower reaches of the River Spey, near the coast of the Moray Firth and is in an area identified as being at high risk of river flooding. Opportunities should be sought to enhance intertidal habitats within the Spey estuary, and to increase riparian planting along the river.

Benefits

2.49 In addition to flood-related benefits, the use of natural flood management measures in these tidal areas along sections of the River Lossie may provide additional benefits including in relation to biodiversity, water quality, climate change. Integrating new footpaths into NFM works and improving access to the natural environment can lead to improvements to health and

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[8] NatureScot website – Landscape Character Assessment: Moray and Nairn – Landscape Evolution and Influences

wellbeing. The delivery and maintenance of the investments can provide local business and employment opportunities, particularly in coastal and land management.

2.50 Restoring and enhancing tidal and estuarine habitats (e.g., wetland, mudflats, saltmarshes) will help support a greater range of species and increase connectivity across the ecological network. Bird species which frequent estuarine areas include redshank, dunlin, peregrine falcon, ringed plover, oystercatcher, sandpiper and curlew. Other mammals include otters and common and grey seals. Likewise, enhancement of sand dunes in Moray will also help enhance these dune habitats for species dependent on them.

2.51 The coastline of Moray features several internationally, nationally, and locally protected nature sites which are on soft coastal areas and therefore vulnerable to flooding. Investment to reduce coastal flooding may also lead to additional benefits for biodiversity at these important designated sites. These include the Moray Firth Special Protection Area (SPA) and Special Area of Conservation (SAC), which were designated for the presence of the great northern diver, red-throated diver and slavonian grebe populations[9]. The Moray and Nairn Coast Ramsar Site, SAC and SSSI were designated for the presence of coastal and riverine habitats including intertidal flats, saltmarsh, dunes and associated floodplain alder woodland and the aquatics plants, invertebrates and mammals they support[10]. Other designated sites include Culbin Sands RSPB Reserve, Findhorn Bay Local Nature Reserve (LNR) and several Sites of Special Scientific Interest (Spey Bay, Cullen to Stake Ness Coast, Masonshaugh, and Culbin Sands, Culbin Forest and Findhorn Bay).

2.52 Tidal and wetland habitats are particularly good at sequestering carbon from the atmosphere, providing benefits in relation to climate change mitigation. The increased occurrence of tidal and wetland habitats, and their improved quality, will help make them more resilient to the future effects of climate change.

2.53 Furthermore, restoration of these areas may help to improve water quality, as wetlands help to filter pollutants from the water. Improving the overall condition of these tidal areas may provide support recreational activities such as bird watching, thereby encouraging more people to use the area. This is likely to have benefits for mental and physical health and wellbeing.

[9] Scottish Government (2020) Moray Firth Special Protection Area: business and regulatory impact assessment

[10] Ramsar Sites Information Service website – Moray and Nair Coast

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Figure 2.3: River and Coastal Flood Risk
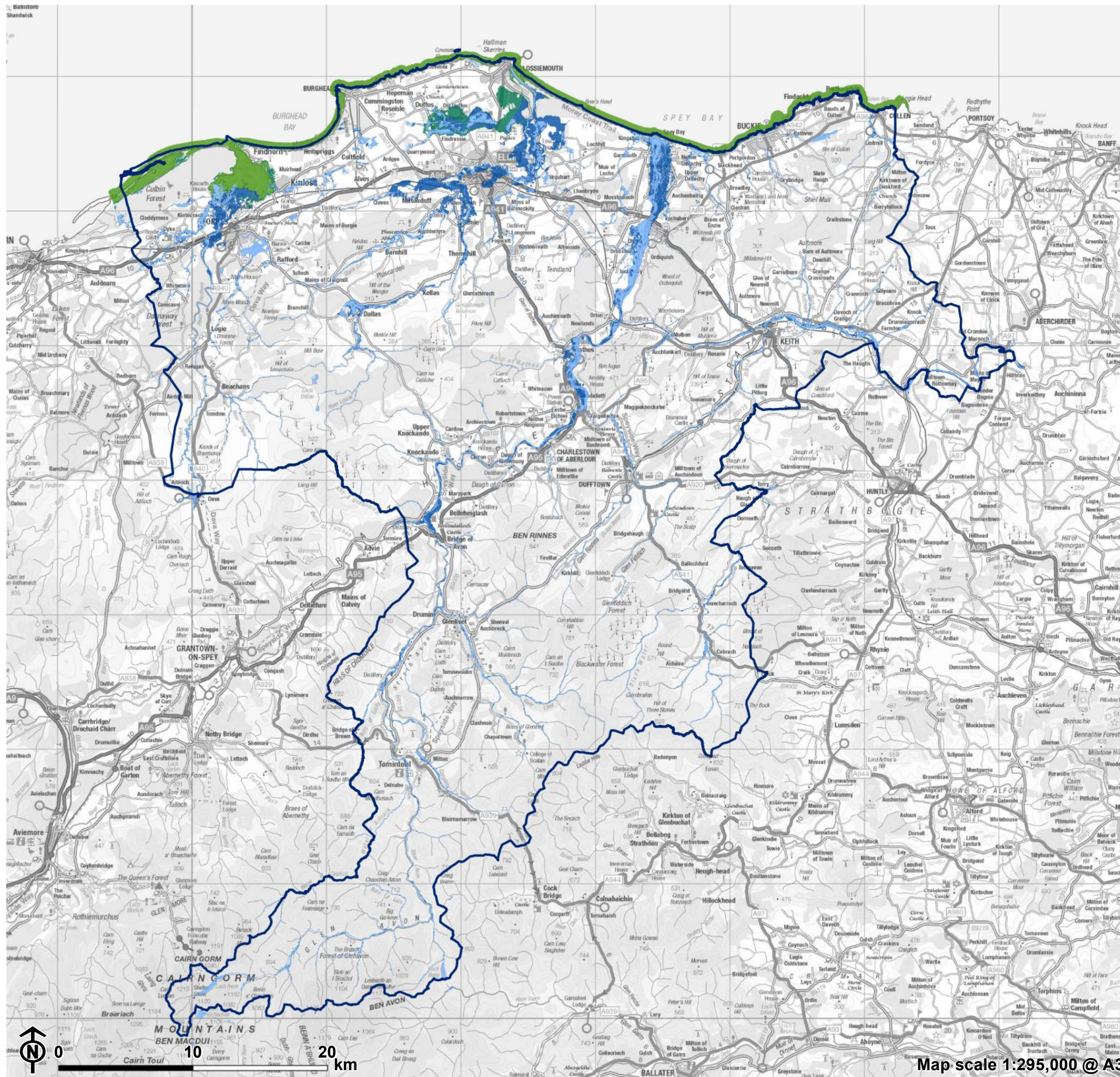
Moray boundary

SEPA Flood Extent

River extent - high likelihood

River extent - 2080 high emission scenario

Coastal extent - high likelihood

Coastal extent - 2080 high emission scenario

Map scale 1:295,000 @ A3

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Source: OS, Moray Council, SEPA

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Figure 2.4: River Status
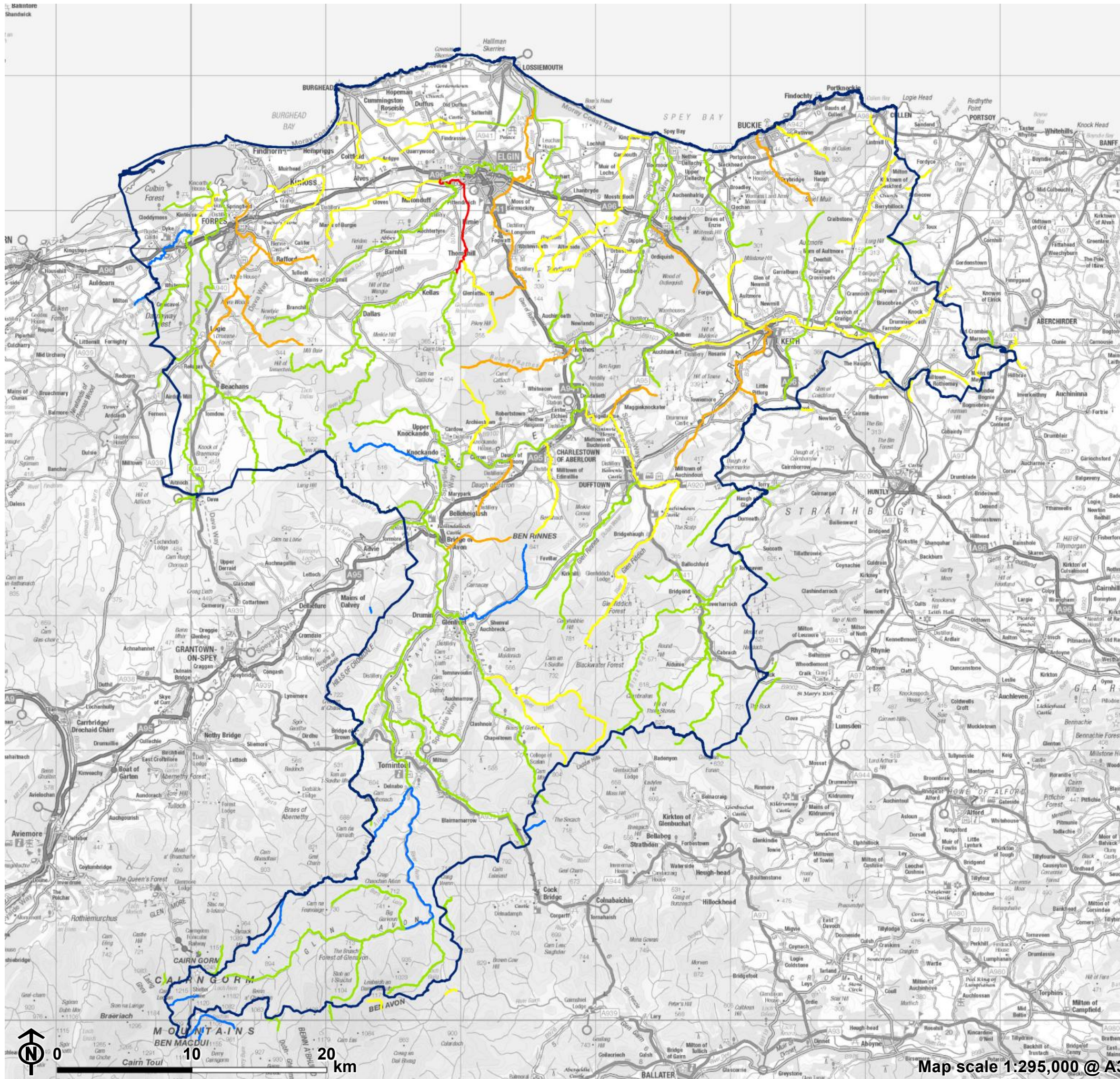
Moray boundary

SEPA River Classifications
- High status / potential
- Good status / potential
- Moderate status / potential
- Poor status / potential
- Bad status / potential

Map scale 1:295,000 @ A3

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Source: OS, Moray Council, SEPA

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Figure 2.5: Opportunity Areas: Coastal and River Flooding, River Status Improvements
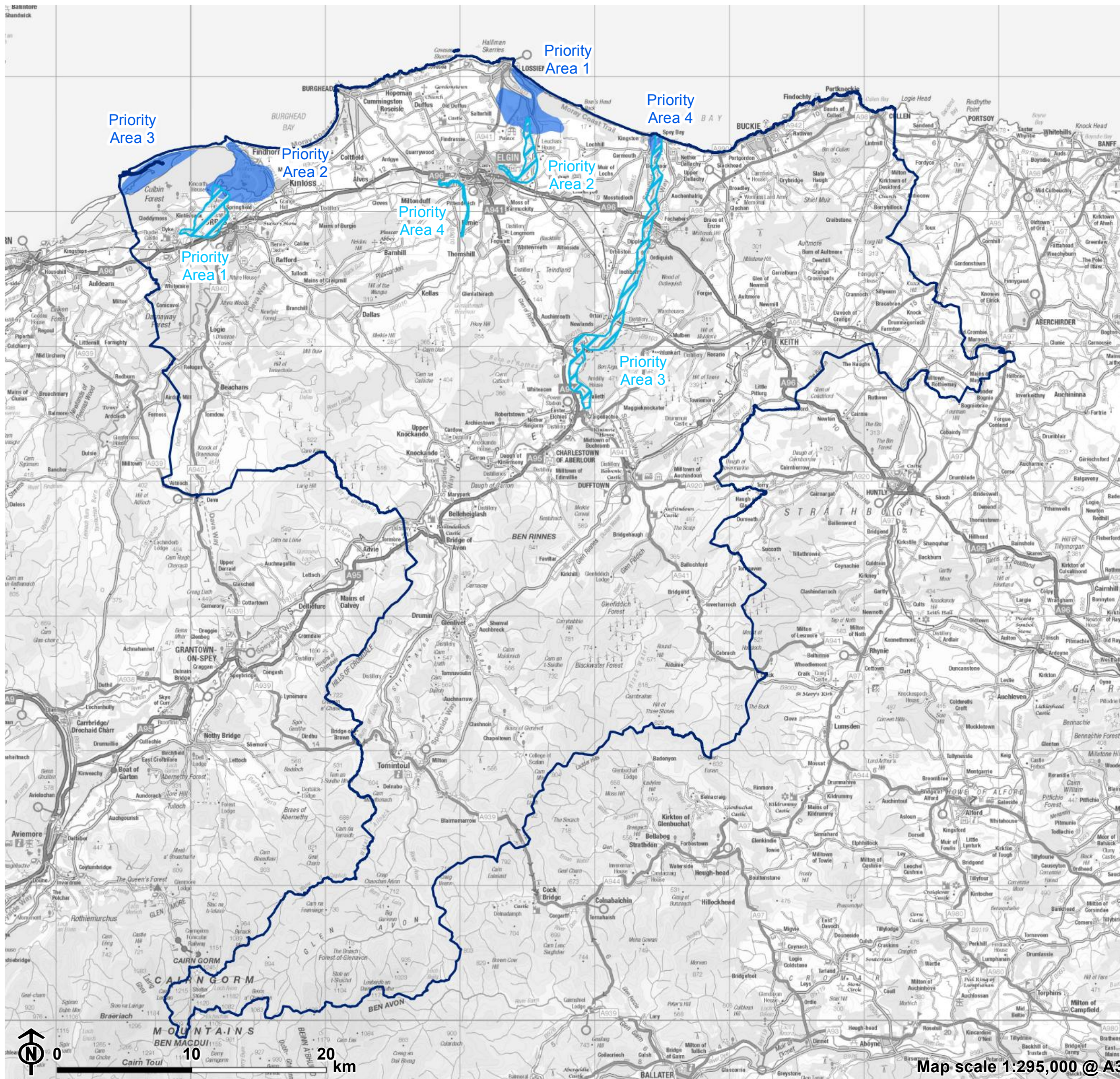
Moray boundary
River flooding opportunity
Coastal flooding opportunity

Map scale 1:295,000 @ A3

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CB:JB EB:bournazel_j LUC 12348B_r1_Opp_Areas_Flooding_A3L 25/04/2023
Source: OS, Moray Council, LUC

Woodland Enhancement

Context

2.54 Native woodlands are comprised of trees which arrived naturally in Scotland without direct human assistance. There are extensive areas of native woodland in Moray, particularly in the north and centre of the area, however there is clear fragmentation in these areas and much of the native woodland has been felled or re-planted with commercial forestry (**Figure 2.6**).

Investment Opportunities

2.55 To identify opportunities for native woodland planting several factors are considered including:

- Preferred areas for woodland creation as identified in the Moray Woodland and Forestry Strategy.

- Opportunities to improve connectivity between existing areas of native woodland.

- The presence of existing riparian woodland along rivers. River banks that lack native woodland should be considered, both upstream within narrower stretches of the river, and downstream within the floodplain.

- Areas of higher flood risk should be considered to stabilise river banks and slow down the flow of run-off from surrounding slopes to reduce flood risk.

- Areas of forestry on peatland. Removal of forestry will help ensure the quality and condition of the peatland is maximised (see Priority Area 6 for Peatland Restoration).

- Planting native woodland in areas where commercial forestry is being restocked following harvesting.

- Opportunities to diversity the species of trees within woodland areas.

Priority Areas

2.56 The initial selection of potential areas for woodland creation/enhancement, and diversification is based on the Moray Woodland and Forestry Strategy (2018) data and the National Forest Inventory (**Figure 2.7**). It is noted that the Moray Woodland and Forestry

Strategy is currently under review, and these recommendations should be reviewed alongside the revised document.

2.57 Areas for woodland creation were identified based on 'preferred areas' for woodland. Removal of forestry and woodland was identified where existing vegetation is found on Class 1 and Class 2 peatland soils.

2.58 Using aerial photography, areas that are being restocked following harvesting should be considered for a more diverse species choice.

2.59 The following strategic areas have been identified as areas which could be prioritised for woodland creation, marked on **Figure 2.8**.

Riparian Woodland Planting

2.60 Riparian woodland has been identified where it would provide a benefit for natural flood management but also where there are notable gaps in the network and riparian woodland would help to improve nature networks and habitat connectivity as well as carbon sequestration.

Priority Area 1
2.61 Priority Area 1 is focused on an area of land to the north-west of Forres. This Priority Area comprises the lower reaches of the River Findhorn and is identified as having limited riparian planting along the river corridor. This area is also identified as being at high risk of river flooding.

Priority Area 2
2.62 Priority Area 2 is focused on an area of land to the north-east of Elgin. This Priority Area comprises the lower reaches of the River Lossie as it flows from Elgin to the Moray Firth. This section of the River Lossie is identified as having limited riparian planting along the river corridor, and is also noted as being at high risk of river flooding.

Priority Area 3
2.63 Priority Area 3 is focused along stretches of the lower reaches of the River Spey. Aerial photography reveals there is a lack of riparian planting in these areas, which are at high risk of river flooding.

Priority Area 4

2.64 Priority Area 4 is focused along stretches of the River Spey between Boat o' Brig and Craigellachie, and near Charlestown of Aberlour. Aerial photography reveals there is a lack of riparian planting along this stretch of the river corridor, which is also at high risk of river flooding.

New Woodland

Priority Area 5

2.65 Priority Area 5 is a large area in the east of Moray, near Keith. This strategic area features predominantly agricultural land and much of the area has been identified as a 'preferred' location for woodland.

Priority Area 6

2.66 Priority Area 6 comprises two areas within the north-east of Moray. This strategic area features predominantly agricultural land, interspersed with small areas of woodland and forestry, including larger blocks within the wider area. Much of this area has been identified as a 'preferred' location for woodland.

Priority Area 7

2.67 Priority Area 7 is a large area to the south of Elgin. This strategic area features predominantly agricultural land, with small blocks of native woodland and forestry, and areas of native woodland. Much of this area has been identified as a 'preferred' location for woodland creation.

Priority Area 8

2.68 Priority Area 8 is a large area within the centre of Moray. It extends from Drummuir in the east to Blacksboat and Marypark in the west. Native woodland is found in pockets throughout this area, and further woodland creation in this area could provide a strategic link to extensive areas of native woodland near Aviemore and Abernethy Forest. Much of this area has been identified as a 'preferred' location for woodland creation.

Commercial Forestry Diversification

Priority Area 9

2.69 Priority Area 9 is an area of commercial forestry between Keith and Cullen in the north-east of Moray. This forestry is currently in various stages of growth and includes extensive areas of recently felled land. Such areas provide opportunities to replant native woodland which holds greater biodiversity benefits, supporting protected native species in Moray such as song thrush, crossbill, capercaillie, fritillary butterflies, pine martens and red squirrels and connecting up fragmented habitats, creating new nature networks.

Priority Area 10

2.70 Priority Area 10 comprises two areas of commercial forestry to the south-west of Elgin. This commercial forestry is currently in various stages of growth and includes areas of recently felled land. Such areas provide opportunities to replant native woodland which hold greater biodiversity benefits. In addition, pockets of native woodland between the two provide opportunities to link and enhance the ecological network here.

Priority Area 11

2.71 Priority Area 11 comprises an extensive area of commercial forestry located to the west of Rothes and Craigellachie. This forestry is currently in various stages of growth and includes areas of recently felled land. Such areas provide opportunities to replant native woodland which hold greater biodiversity benefits.

Benefits

2.72 Native woodlands provide key habitats throughout the landscape, helping to provide 'stepping stones' within the ecological network. Linear features, such as riparian woodland along river systems, help to improve connectivity across the ecological network, and contribute to green corridors. Woodlands, and in particular riparian woodlands, also play a major role in reducing flood risk by intercepting rainfall and slowing surface water run-off.

2.73 Planting more native woodland will have benefits for climate change mitigation due to its potential to sequester and store carbon from the atmosphere. In addition, woodland creation and enhancement will provide benefits for biodiversity by increasing woodland habitats across

Moray and improving connectivity between existing areas of woodland. This will have further benefits, by making biodiversity more resilient to the future changes in climate.

2.74 Planting more woodland will have further benefits for water quality by intercepting precipitation and increasing water infiltration in soils. This reduces the amount of surface water run-off, and sediment, entering watercourses, improving water quality and reducing flood risk. Trees can also help prevent soil erosion.

2.75 Introducing more native woodland will also have benefits for landscape character and may improve health and well-being, by encouraging people to be out in nature more often and lead more active lifestyles. Woodland creation and restoration would also create opportunities for local employment and opportunities for local business in the land management or forestry sectors to start-up or grow.

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Figure 2.6: Woodland and Forestry Cover
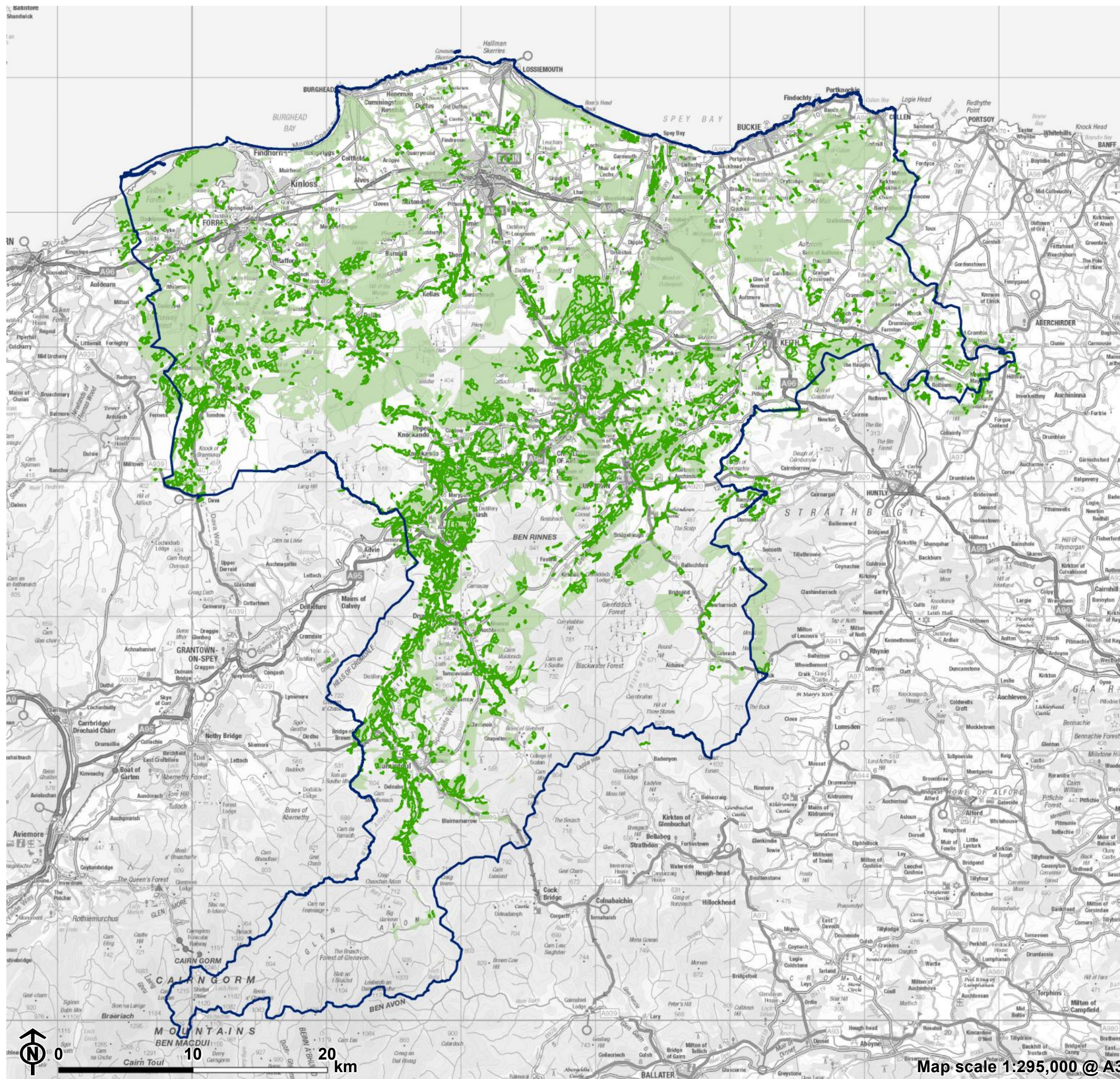
Moray boundary
National Forest Inventory (2020)
Native woodland - Integrated Habitat Network
Core Native Woodland

Map scale 1:295,000 @ A3

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CB:JB EB:bournazel_j LUC 42348B_r1_Woodland_Forestry_Cover_A3L 26/04/2023
Source: OS, Moray Council, FC

Figure 2.7: Preferred Areas for New Woodland Creation
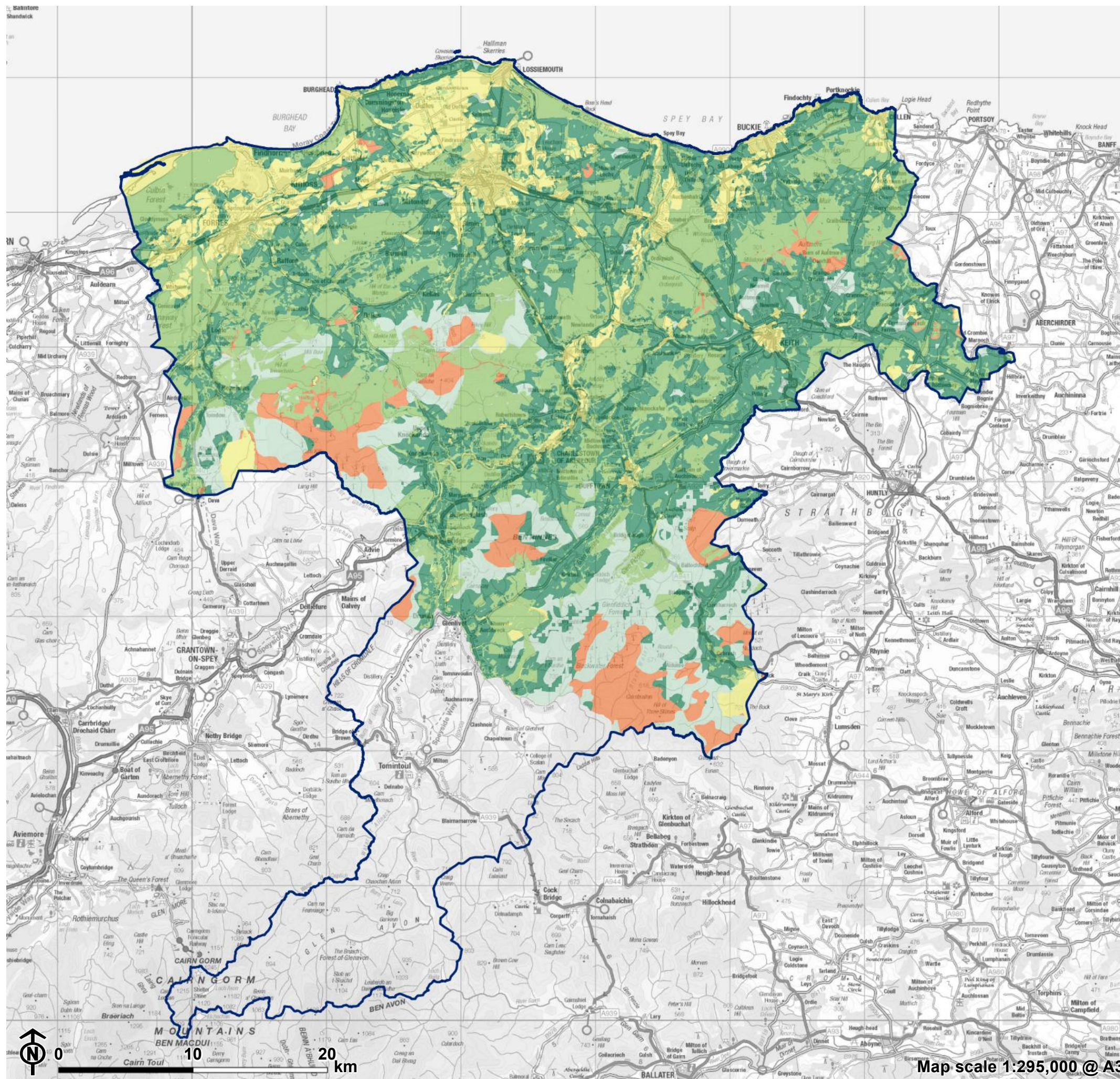
Moray boundary

Moray Woodland and Forestry Strategy (2018)

Existing Woodland

Likely to be unsuitable

Potential

Preferred

Sensitive

Map scale 1:295,000 @ A3

CB:JB EB:bournazel_j LUC 12348B_r1_Preferred_Areas_New_Woodland_Creation_A3L 26/04/2023
Source: OS, Moray Council

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Figure 2.8: Opportunity Areas: New Woodland, Riparian Planting and Forestry Diversification
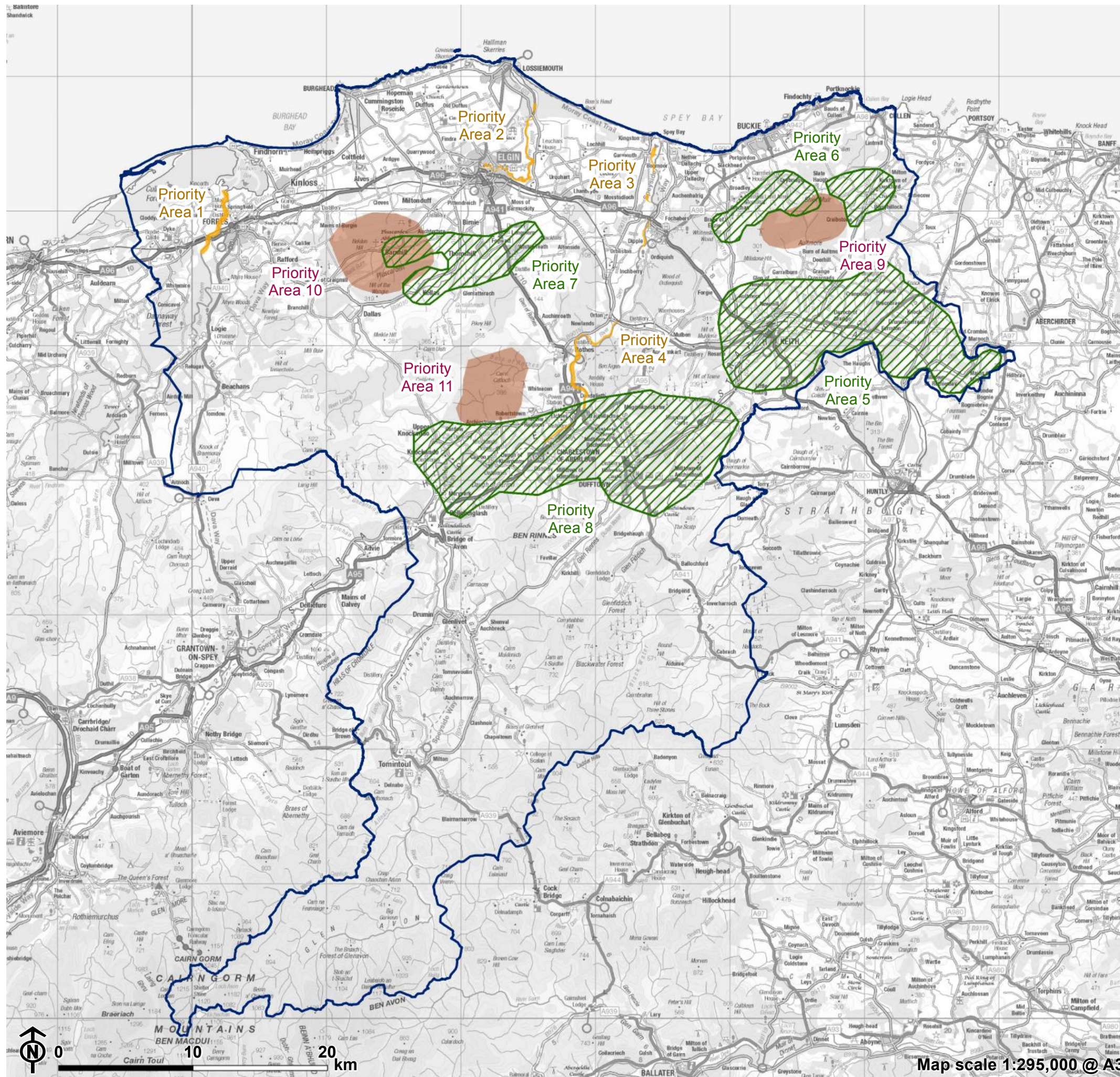
Moray boundary

New woodland opportunity

Riparian woodland planting opportunity

Commercial forestry diversification opportunity

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Source: OS, Moray Council, LUC

Agricultural Land Enhancements

Context

2.76 Scotland's soils data on land capability for agriculture was used to identify potential investment opportunity areas for agricultural land. Large areas of Moray near the coast are identified as having Grade 2 and 3.1 [11]agricultural land which is capable of supporting a very wide range of crops (**Figure 2.9**). Such areas are often more intensively farmed, with associated adverse effects on the environment. Many of these areas are associated with floodplains which are nutrient rich, with adverse effects on water quality because of agricultural activities.

Investment Opportunities

2.77 Such agricultural areas offer opportunities for alternative practices which are more sustainable and reduce the carbon footprint of farming operations. A 'payment for ecosystem services' approach provides financial incentives or payment to land-managers for providing ecosystem services by maintaining and improving ecosystems above and beyond the regulatory requirements. This approach aims to support good environmental management and can provide ecosystem benefits across the four categories of ecosystem services: provisioning, regulating, supporting and cultural. The actions to achieve enhanced ecosystem services are wide ranging. The payments can help contribute towards the costs of actions or be paid upon achieving objective.

2.78 The payment for ecosystem services approach can include a wide variety of options for enhancing agricultural land including, but not limited to:

- Maintaining and enhancing existing areas of native woodland and planting new woodland on farms;
- Introducing new habitats (e.g. wildflowers, ponds etc.); and
- Replacing single species conifer blocks with native woodland.

2.79 In addition, the following options were considered in relation to agricultural land enhancements:

- Knowledge sharing to promote less intensive agricultural practices (e.g. crop rotation, integrating grass leys in to crop rotations, non-invasive tillage, prevision fertiliser application); and
- Creating community run farms or Community Supported Agriculture (CSA).

Priority Areas

2.80 The initial selection of potential areas for agricultural land enhancement is based on land capability for agriculture classifications and arable land use data, and primarily focused on the areas of class 2 (land capable of producing a wide range of crops) and 3.1 (land capable of producing consistently high yields of a narrow range of crops and/or moderate yields of a wider range).

2.81 The following strategic areas have been identified as having potential for enhancement (also see **Figure 2.10**).

Priority Areas 1-4

2.82 Agricultural land classifications and land use data indicates that the following Priority Areas 1-4 are in areas identified as being situated on primarily Grade 2 or 3 agricultural land and in areas where arable land is the main land use. Any of the investment opportunities could be sought in each of these areas.

2.83 Priority Area 1 is located along the River Spey between Kirkhill and Fochabers. This land is identified as arable land and is situated primarily on Grade 2 agricultural land.

2.84 Priority Area 2 is located along the River Lossie near Lossiemouth. This land is identified as arable land and is situated primarily on Grade 3.1 agricultural land.

2.85 Priority Area 3 is located to the north-west of Elgin. This land is identified as arable land and is situated primarily on Grade 2 and 3.1 agricultural land.

---

[11] Scotland's Soils website – Land capability for agriculture (partial cover)

2.86 Priority Area 4 is located to the north of Forres. This land is associated with the floodplains of the River Findhorn. It is identified as arable land and is situated primarily on Grade 2 agricultural land.

Benefits

2.87 Altering intensive agricultural practices will have a variety of benefits for the environment. Practising less intensive farming (e.g., reducing tillage) will help to reduce soil erosion, having benefits for both soil structure and water quality. Practicing crop rotation and reduced use of fertiliser will also improve soil and water quality.

2.88 Incorporating additional habitats onto agricultural land such as woodlands, wildflower meadows and ponds, will have benefits for biodiversity and help expand and better connect the ecological network. Furthermore, planting more native woodland will have benefits for climate mitigation due to their potential to sequester carbon from the atmosphere and store it.

2.89 Implementing community supported agriculture models can have benefits for local economic development, education and health and wellbeing through the promotion of healthy eating.

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Figure 2.9: Agricultural Land Classification

☐ Moray boundary

Land Capability for Agriculture

Prime Agricultural Land

2 - Land capable of producing a wide range of crops

3.1 - Land capable of producing consistently high yields of a narrow range of crops and/or moderate yields of a wider range

Land Capable of Supporting Mixed Agriculture

3.2 - Land capable of average production though high yields of bareley, oats and grass can be obtained

4.1 - Land capable of producing narrow range of crops: grassland with short arable breaks of forage crops and cereal

4.2 - Land capable of producing narrow range of crops: grassland with short arable breaks of forage crops

Land Capable of Supporting Improved Grassland

5.2 - Land capable of use as improved grassland. Few problem with pasture establishment but may be difficult to maintain

5.3 - Land capable of use as improved grassland. Pasture deteriorates quickly

Land Capable of Supporting only Rough Grazing

6.1 - Land capable of use as rough grazings with a high proportion of palatable plants

6.2 - Land capable of use as rough grazings with moderate quality plants

6.3 - Land capable of use as rough grazings with low quality plants

Limited Agricultural Value

7 - Land of very limited agricultural value

Map scale 1:295,000 @ A3

CB:JB EB:Bournazel_j LUC 12348B_r1_Agricultural_Land_Classif_A3L
25/04/2023 Source: OS, Moray Council, JHI

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**Figure 2.10: Opportunity Areas:
Agricultural Land Enhancement**
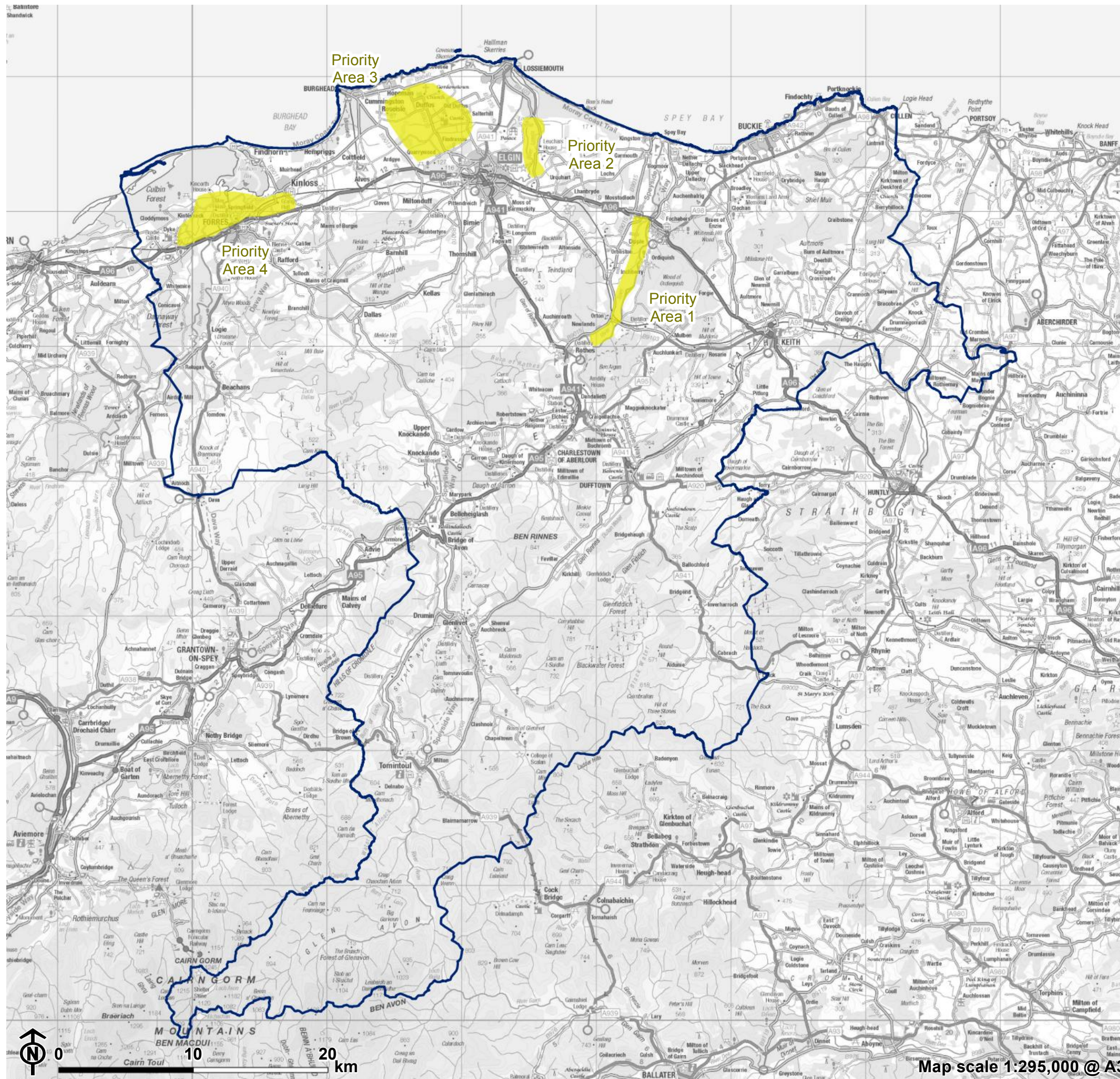
Moray boundary

Agricultural land enhancement opportunity

Map scale 1:295,000 @ A3

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Source: OS, Moray Council, LUC

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Figure 2.11: Natural Capital Investment Opportunity Areas
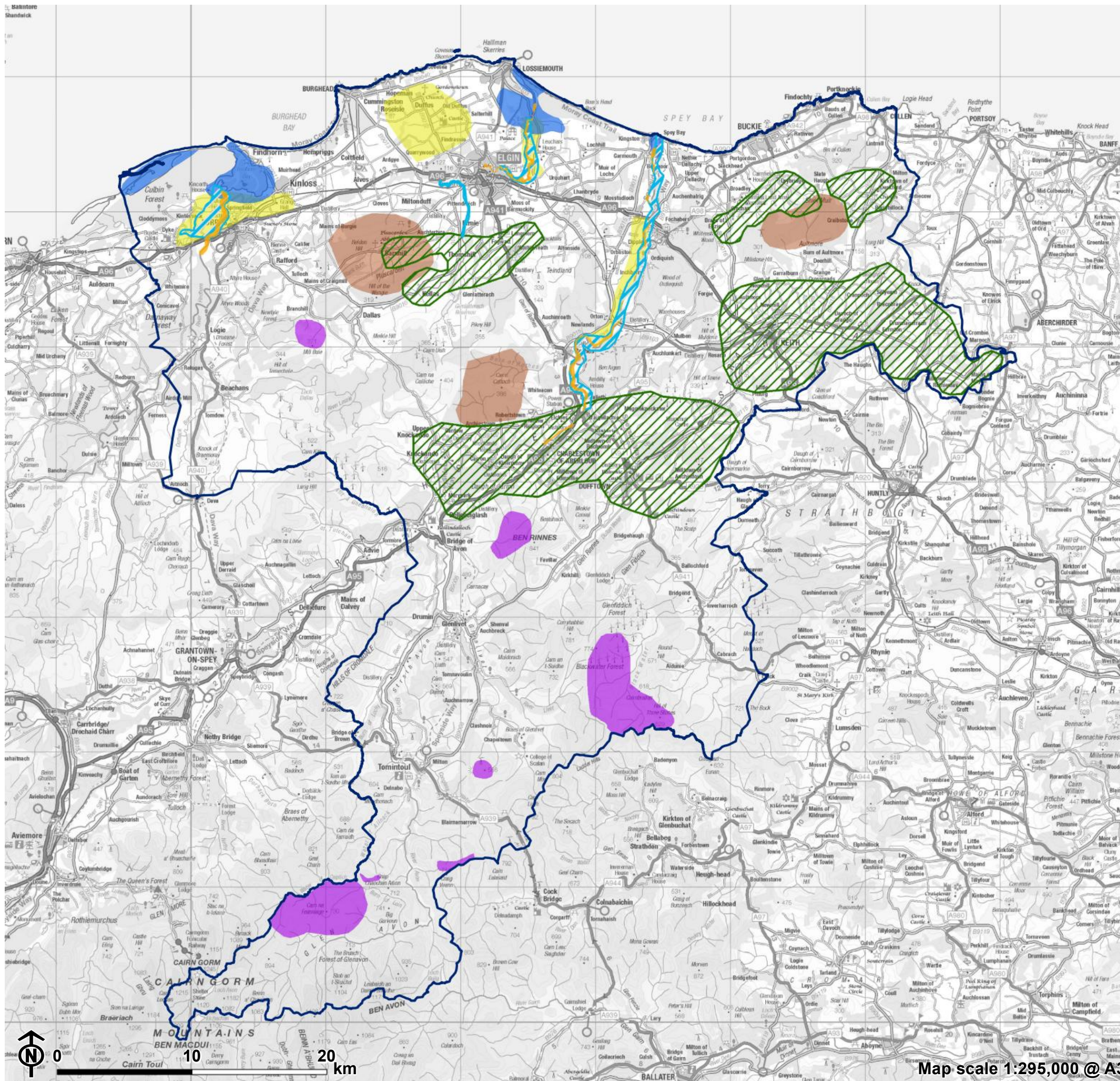
Moray boundary

Opportunity Areas
- Peatland restoration
- River flooding
- Coastal flooding
- Riparian woodland planting
- New woodland
- Commercial forestry diversification
- Agricultural land enhancement

Map scale 1:295,000 @ A3

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Source: OS, Moray Council, LUC

Chapter 3
Natural Capital Associated Investments

3.1 This chapter explores the opportunities to enhance the benefits associated with investment in natural capital assets. This includes recommended supporting investments which would increase recreational access and use of these areas by local communities and visitors, and associated tourism development. Several high-level opportunities for enhancement have been identified and this chapter outlines these opportunities, potential locations and the benefits they could achieve.

3.2 This chapter should be read in conjunction with the Moray Woodland and Forestry Strategy (currently under review)[12] which identifies key access, recreation and tourism aspirations associated with woodland and forestry and which Moray Council are supportive of in principle. Some of the Strategy recommendations overlap with opportunities outlined in this report due to the known support of Moray Council. However, the opportunities in this report reflect the whole range of natural capital investment opportunities identified, not just those associated with woodland enhancement.

Transport and Access

3.3 Ensuring sustainable easy access to the landscape will be critical to realising the associated benefits of access without leading to potential negative effects such as increased car use. This improved access should benefit both visitors to Moray and provide better connections for local communities.

Road Network

3.4 There are number of key roads that provide access to and throughout Moray including the A95, A96, A939, A940 and A941.

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[12] Moray Council (2018) Moray Woodland & Forestry Strategy – Supplementary Guidance (page 13-14)

3.5 The A95 provides a link to the A9 which is the key route to the Central Belt. The A96 connects Aberdeen to Inverness along the Moray coast through Elgin. Finally, the A941 provides a link between the A95 and A96. All three main roads provide a connection point to Elgin. The A939 and A940 provide a north-south connection between Forres and Bridge of Gairn. Although the private car is the main way to travel through Moray, there are limited options to make use of more sustainable vehicle options such as electric vehicles. There are currently 90 charging points across the Council area. Moray Council has plans to install an additional 61 charging points and it is now a requirement that these should be provided within all new developments[13]. Locations for these new charging points should be considered in the context of the main visitor and community access points once final locations for the natural capital investments are known.

Public Transport

3.6 Stagecoach runs the main buses within Moray which include the number 10, 31, 35, 38 and 36. The main bus routes connect the main towns in Moray to Aberdeen and Inverness. Most smaller settlements are connected to Elgin via bus routes. There are buses roughly every 30 minutes from Elgin to Aberdeen. Bus services to Inverness are not as frequent and vary throughout the area. Bus services connect the Aberlour area to several natural capital investment opportunity areas, in particular priority area 8 which could accommodate new woodland. Bus services also provide connections to Fochabers allowing connection to three natural capital investment opportunity areas (woodland, priority area 2, river flooding priority area 2 and coastal flooding priority area 4).

3.7 There are further opportunities to make bus travel more attractive, accessible and useful to the travelling public, including through the Council's new 'm-connect' service which launched in May 2022, an on-demand bus service for journeys throughout Moray[14].

3.8 There are three train stations in Moray; Forres, Elgin and Keith. The train stations are on the Inverness to Aberdeen line which runs on average every 2 hours with some additional trains at peak times. The train station within Forres provides public transport connections to some of the natural capital opportunity areas, in particular four priority areas for river flooding, coastal flooding, agricultural land enhancement and riparian woodland planting opportunity areas.

Within and around Keith, new woodland priority area 5 will be able to be accessed via Keith Train station and several bus routes that connect to Elgin.

3.9 Elgin is the main town within Moray with rail and bus links out with Moray and to smaller settlements. Elgin is a key centre providing public transport links to several different priority areas near Elgin and within smaller settlements.

3.10 There is an opportunity to support and ensure the future of the Keith and Dufftown Railway, which presently runs services between Keith Town and Dufftown. Re-connecting this line to the mainline at Keith may increase sustainable travel along this corridor.

3.11 Beyond thing, there is limited capacity to improve rail connections within Moray within the scope of a programme of Natural Capital investment, however there may be opportunities to improve onward bus links from key stations to areas where investments in natural capital assets have been made.

Cycle Infrastructure

3.12 The National Cycle Route 1 runs through Moray connecting Aberdeen to Inverness. The cycle routes in Moray are discussed in more detail later within this chapter under access through the landscape. Bike hire is available in several locations across Moray but is mainly limited to Elgin, Lossiemouth, Forres, Findhorn and Cullen. There is limited bike hire in the more inland parts of Moray, where most of the natural capital investments area proposed.

Investment Opportunities

3.13 The following investment opportunities have been identified to improve access to the landscape:

■ Increase e-charging points across Moray, in particular along the A95, A96 and A939 and other main access routes to the locations of natural capital investment areas once known.

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[13] Moray Council (2023) Moray adopts Electric Vehicle Charging plan

[14] Moray Council website – m.connect

- Increase the number of passengers using the rail service and arriving by rail in Moray. This could include a Moray railcard, similar to the 'Highland Railcard[15]' which provides discounts to residents of Moray on local trainlines.

- Support the re-connection of the Keith and Dufftown Railway to the mainline at Keith and the facilitation of active travel along this sustainable transport corridor.

- Bus service improvements, including increasing the frequency of services between the main investment locations, rail stations and larger settlements. This would require engagement with Stagecoach and promotion of the routes to ensure financial viability.

- Increase bike hire opportunities, especially near public transport interchange, making use of support to businesses such as the Scottish Growth Scheme.

- Improve cycling routes between the main towns and village and investment areas, making use of funding streams such as the Cycling Friendly programme and Sustrans Places for Everyone.

Benefits

3.14 Investment in transport infrastructure means that more of Moray's natural capital assets will be accessible providing cultural ecosystem service benefits such as enhanced health and wellbeing to residents and tourists.

3.15 Increasing e-charging points, improving public transport options and improving cycling infrastructure across Moray will allow more people, including both residents and tourists, to travel in a more sustainable way, reducing emissions and improving air quality.

3.16 Improving transport connectivity to and within Moray will help make the area more accessible and could increase the number of visitors. This will encourage increased spend in the local economy supporting local businesses, particularly those in the tourism industry.

Recreational Routes and Connectivity

Footpath and Cycle Network

3.17 Moray has a large network of core paths. Some of these core paths include links between the natural capital investment opportunity areas identified, however, there will be opportunities to integrate additional path networks within the opportunity areas and address existing gaps within the network close to or within the opportunity areas. To enhance the path network the incorporation of heritage/ecological interpretation and play opportunities can add to the recreational offer and improve the attractiveness of visits. This can be through both physical interpretation panels or via QR codes or an app which link to additional digital information. This could incorporate additional features such as an audio heritage trail or mindfulness activities.

3.18 The National Cycle Route 1 is a fully sign posted cycle route that runs along the east coast of Britain from Dover to John O' Groats. Within Moray, the route connects Aberdeen to Inverness. The National Cycle Route 1 is part of the National Cycle Network. Some other fully sign posted cycle routes in Moray include:

- Elgin Experience cycle route (20.8km) – A circular loop through Elgin and the surrounding countryside.

- Glenlivet Estate Cycle Trails (27.4km) – A network of eight trails of varying length within the estate.

- Lossiemouth Loop (22.4km) – Which passes around the perimeter of the airfield via Duffus Castle and back.

- Moray Coastal Cycle Route (46.4km) – Which extends from Burghead to Cullen, linking the coastal communities.

- Moray Monster Trails, near Fochabers – Series of mountain bike trails between 4.1km and 8.8km of varying grades.

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[15] Scotrail website – Highland Railcard

Opportunities

3.19 Improving and extending footpath and cycle networks is an opportunity to increase access to the landscape. New footpaths and cycle routes can be incorporated into the design of these areas.

3.20 The following actions have been identified to maximise benefit from natural capital investment and improvements to access:

- Provide new access routes within any natural capital investment areas, utilising appropriate surfacing to manage balance between access and nature restoration (e.g. boardwalks within areas of peatland restoration areas), routing paths to minimise disturbance to sensitive areas, and to maximise all abilities path provision;

- Provide new cycle routes within natural capital investment opportunity areas to provide an additional recreational offer;

- Provide interpretation and play alongside the path network to enhance recreational offer and incentivise visits; and

- Explore opportunities for providing additional digital interpretation and/or activities through an app or QR code links to a dedicated website.

Benefits

3.21 Improving access to landscape will enhance the tourism offer by offering more things to see and do.

3.22 Health and wellbeing benefits through access to nature, physical activity and recreation. The integration of interpretation and play will enhance the recreational offer and realise benefits for education and child development.

3.23 The use of path networks will manage indiscriminate access to the landscape can reduce soil erosion and allow space for nature restoration.

Long Distance Routes

3.24 Long distance routes provide an opportunity to experience the local landscape and habitats while offering a tourist attraction. Moray contains several long-distance routes with sections accessible for cycling and horse-riding. These include:

- Moray Coastal Trail – A 76.8km route along a waymarked coastal trail from Findhorn to Cullen.

- Isla Way – A 20km route providing a link between Keith and Dufftown.

- Tomintoul Spur – A 24km branch of the Speyside Way heading up over moorland from Cragganmore to Tomintoul.

- Speyside Way – Oone of four official long-distance Routes in Scotland. The route links the Moray coast with the edge of the Grampian Mountains, generally following the valley of the River Spey. The route totals 68.9km.

- Dava Way – Follows the old Highland Railway line for 38km between Forres and Granton-on-Spey.

3.25 The Moray Way is Moray's longest distance route. It is a circular route, which follows the Moray Firth coast, crosses over moorland and tracks the River Spey. The Moray Way combines the whole of The Dava Way, two-thirds of The Moray Coast Trail and approximately half of The Speyside Way creating a loop of a 160 km, which can be walked in five to nine days. The route can be walked in either direction, starting and finishing at any point with many entry/exit points with car parking nearby. The route is waymarked throughout, markers and fingerposts carry the logos of the Dava Way, Speyside Way and the Moray Coast Trail.

3.26 The National Cycle Route 1 runs parallel to the A96 running along the Moray coast connecting Aberdeen to Inverness. The other main cycle routes in Moray are the Moray Coastal Cycle Route (46.4km), Lossiemouth Loop (22.4km), Glenlivet Estate Cycle Trails and the Elgin Experience Cycle Route (20.8km).

3.27 Moray Council has developed a Strategic Infrastructure Plan for its main routes and has identified 8 key projects to help meet objectives to maximise investment, support communities and businesses to capitalise on increased use of routes, support an enhanced visitor experience and overall outdoor offer in Moray, especially in places where there is currently

weak route infrastructure and provide a focus on infrastructure that can help reduce the impacts of climate change[16].

Opportunities

3.28 Enhancing Moray's natural capital assets will offer opportunities to integrate Moray's existing plans to enhance long distance routes into a wider programme of work. The following opportunities could be integrated into any plans:

- Ensure sufficient waymarking and signage to help people navigate long distance routes;
- Improve surfacing and remove unnecessary obstacles such as gates to create a wider all-ability walking, cycling and horse-riding network; and
- Explore further opportunities to provide new branches to long-distance routes which would connect communities to the proposed natural capital asset investments.

Benefits

3.29 Investment in long distance routes within Moray and ensuring that the routes are accessible to all will allow increased access to these routes and bring positive benefits to health and wellbeing.

3.30 Enhancing long-distance routes will allow tourists to visit natural capital investment areas and their landscape features and habitats enhancing the overall tourism offer and supporting an increase in visitor numbers.

Tourism and Eco-tourism

3.31 Tourism is a major part of Moray's economy, accounting for 10% of Moray's total employment[17]. The diversity of Moray's landscape offers a variety of tourism opportunities. Moray contains a mixture of rugged coastline, farmland, forests and mountains offering land and wildlife diversity. The wide range of habitats play host to many bird and animal species, including osprey, golden eagle, capercaillie and red squirrel. The Moray Firth is also home to

bottlenose dolphins, which can often be seen from the shore. The southern tip of Moray falls within the Cairngorms National Park. There are many opportunities for a range of summer and winter outdoor activities which include walking, cycling, wildlife watching and extreme sports.

3.32 Investing in natural capital enhancement is therefore likely to increase the appeal of the local area. Investing in tourism infrastructure such as overnight accommodation, hospitality and visitor centres will support a growth in tourism numbers and provide new business opportunities.

3.33 In particular, natural capital investment will provide the opportunity to create and expand the eco-tourism offer in Moray. Eco-tourism provides a more sustainable travel offer and often includes opportunities to learn about local environments and wildlife.

3.34 Moray already has a reasonably well-developed eco-tourism offer[18], with wildlife watching offers particularly around the coast and in the Cairngorms National Park and the eco-village at Findhorn but there is an opportunity to increase this through investment in the restoration of peatland, woodland, riparian and coastal habitats which will support protected species and provide opportunities for people to engage with and learn about the natural environment.

Opportunities

3.35 The following opportunities have been identified for investment:

- Expand wildlife watching and educational opportunities in natural capital investment opportunity areas;
- Explore potential to integrate wildlife centres with areas of investment; and
- Support the development of sustainable accommodation offers.

Benefits

3.36 The following benefits could be achieved through investments:

- Reduce any negative impacts of unmanaged and unsustainable tourism;

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[16] Moray Routes Strategic Infrastructure Plan (October 2022)
[17] Highlands and Islands Enterprise, Tourism in Moray – The Strategy for Tourism Development in Moray

[18] Moray Speyside website

- Volunteering and educational opportunities associated with engaging in the natural environment and learning about sustainable lifestyles; and

- Support growth of existing and new businesses and creation of new jobs.

Chapter 4
Skills Requirements

4.1 Nature restoration and carbon off-setting at the scale required by UK and Scottish Government targets to meet the twin crises of climate and nature will require a significantly increased and suitably skilled workforce in these areas. Nature-based jobs grew at more than five times the rate of all jobs in Scotland between 2015 and 2019 and accounted for a third of all job growth during this period[19].

4.2 NatureScot research[20] has identified a significant skills shortage to meet this job growth, and investment in skills training will be essential to ensure there is a suitably qualified workforce. Scotland's nature-based sector skills and labour shortage is relevant to the natural capital investment opportunities identified in Moray. As part of this study, we have carried out an assessment of both the job roles needed to undertake the proposed investments and the specialist skills these jobs require using the NatureScot research and matching with the specific investment opportunities identified.

4.3 Engagement with the University of the Highlands and Islands (UHI) demonstrated that uptake of their environmental land management degrees is increasing and there are also positive signs that schools are integrating more of this type of learning into the curriculum at an earlier stage to develop the interest of young people for careers in this sector. UHI also offer qualifications in the following, with some delivered at their Moray campus and others based at other campuses or accessible online:

- HNC/HND: Aboriculture and urban forestry (Inverness)
- HNC/HND/PDA: Forestry (Inverness)
- HNC: Wildlife and conservation management (North or West Highland)
- BA (Hons): Adventure tourism management (West Highland)
- BA (Hons): Culture and heritage (Moray)

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[19] NatureScot website – Nature-based jobs and skills Action Plan 2023-2024

[20] NatureScot (2020) Supporting a Green Recovery: an initial assessment of nature-based jobs and skills

- BSc (Hons): Forest management (Inverness)

- BSc (Hons) Geography (Inverness)

- BA(Hons)/HND: Hospitality management (Perth)

- BA (Hons): Marine and coastal tourism (West Highland)

- BA (Hons): Sustainable development (Argyll/West Highland)

- MSc: Sustainable mountain development (Perth)

- MSc: Tourism (Perth)

- CPD: Award Water resources in a changing climate (Online)

- CPD: Award Sustainable deer management (Online)

- CPD: Award Rural community development (Online)

- CPD: Award Sustainable resource management (Online)

4.4 It is important to note that a wide range of professions and skills are required and the skills acquired through the range of courses currently offered at UHI will not be sufficient to undertake the full range of jobs in the sector.

Jobs and Skills

4.5 Tables 4.1 to 4.5 set out the jobs and skills requirements associated with the opportunity areas identified in **Chapter 2**. The tables provide an overview of jobs and skills requirements for each natural capital investment opportunity identified. The focus is on specialist skills in each area, though it should be noted that many general skills will also be required such as communication, project management, community engagement and general ICT skills.

Peatland Restoration

Table 4.1: Peatland restoration skills and jobs

Skills	Jobs
- Peatland hydrology - Groundwater investigation (GI) and modelling - Ecological and ornithological surveying and field skills - Biodiversity and wildlife management - Remote sensing, GIS and data analysis - Carbon sequestration monitoring/carbon management - Land management (peatland) planning	- Peatland restoration practitioner (design of restoration scheme) - Peatland restoration contractor (specialist machinery operator) - Land manager - Hydrologist - Ecologist/ornithologist - GIS/remote sensing technicians - Planners

Woodland Restoration and Creation

Table 4.2: Woodland restoration and creation skills and jobs

Skills	Jobs
- Forestry and woodland management (planting, pruning, thinning, felling, fencing, maintenance and protection) - Biodiversity and wildlife management - Arboriculture - Silviculture - Agroforestry - Ecological surveying and field skills - Land use appraisal and landscape design	- Forest and woodland managers - Forest craftsperson/contractor (planting, pruning, thinning and felling, fencing, protection, maintenance, felling and harvesting) - Woodland restoration specialist - Arboriculturist/tree specialist - GIS/remote sensing technicians - Forest and woodland ecologist - Planner

Skills	Jobs
■ Remote sensing, GIS and data analysis ■ Carbon sequestration monitoring/carbon management ■ Land management (forestry) planning	■ Forest and woodland ranger ■ Recreation and community specialist

Flood Risk Management

Table 4.3: Coastal and river flood risk management skills and jobs

Skills	Jobs

■ Civil engineering
■ Flood risk modelling and management
■ SuDS design
■ Natural flood management and nature based solutions (NBS) skills e.g.:
  – Riparian woodland design
  – River and flood plain restoration
  – Wetland restoration
■ Remote sensing, GIS and data analysis
■ Ecological surveying and field skills
	■ Hydrologist/flood risk modeller
	■ Flood risk and drainage engineer
	■ Geomorphologist (coastal/fluvial)
	■ Flood liaison officer
	■ Ecological engineer (natural flood management, coastal protection, SuDS design)
	■ GIS/remote sensing technicians
	■ Aquatic ecologist and ornithologist
	■ Planner

Agriculture and Agro-ecology

Table 4.4: Agriculture land enhancement and agro-ecology skills and jobs

Skills	Jobs
■ Sustainable farming practices ■ Ecosystem service skills ■ Carbon management ■ Soil health ■ Horticulture ■ Biodiversity and wildlife management ■ Economic diversification of farming practices ■ Land management and conservation	■ Farmer/farm manager ■ Agro-ecological advisor ■ Regenerative agricultural practitioners ■ Advisors in integrated land management ■ Soil and plant scientist ■ Conservation planner ■ Fencers

Tourism and Recreation

Table 4.5: Tourism and recreation skills and jobs

Skills	Jobs

■ Marketing and events
■ Hospitality and customer service
■ Local knowledge:
  – Landscape, nature and biodiversity
  – Cultural heritage
  – Food, drink, retail and leisure
  – Whisky
■ Teaching
	■ Marketing
	■ Event planning
	■ Outdoor activities operators, tour providers and instructors (e.g. walking, cycling, boat tours and kayaking)
	■ Outdoor education officer
	■ Wildlife guiding
	■ Accommodation and hospitality jobs
	■ Distiller

Chapter 5
Delivery and Funding Mechanisms

5.1 There are several existing delivery and funding mechanisms for the delivery of natural capital investment and carbon off-setting projects. Similar projects have previously largely relied on public sector grant funds. However, it is now widely recognised that private sector funding will be required to meet the scale of change required to meet net-zero and nature recovery targets. The Green Finance Institute has identified a finance gap in Scotland of between £15bn and £27bn to meet nature related outcomes as determined by national policy[21]. This chapter summarises the most used and immediately available delivery and funding mechanisms. It is important to note that this is a developing area and the UK and Scottish Governments both have programmes in place to explore additional delivery and funding opportunities.

5.2 This chapter covers the following delivery and funding mechanisms:

- Developer obligations;
- Biodiversity net gain;
- Developer carbon-offset payments;
- Community benefit funding;
- Payment for ecosystem services;
- Carbon markets;
- Landscape Enterprise Networks; and
- Grant funding.

5.3 Chapters 6, 7 and 8 then explore some of these delivery and funding mechanisms in more detail through case studies.

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[21] Green Finance Institute (2021) The Finance Gap for UK Nature

Methodology and Limitations

5.4 Stakeholder engagement was carried out with the Planning team at Scottish Government, responsible for the natural environment policies in NPF4 and other key agencies including the Innovation Policy team at SEPA and NatureScot's Green Finance team to establish their current positions on the various delivery mechanisms and their feedback has been fed into this chapter.

5.5 Further information was identified from a range of government and agency sources to present the full details of each mechanism.

5.6 Other stakeholders contacted included the Speyside Catchment Initiative, but no response was received.

5.7 It should be noted that some of the mechanisms outlined are in the very early stages of development and therefore may need updating once more detailed policy positions are released and as the various delivery mechanisms are adapted through practice.

Developer Contributions

5.8 In Scotland there are well-established mechanisms for seeking financial and in-kind contributions from developers as part of the planning process. These mechanisms may be relevant in certain limited circumstances subject to the applicable policy and legal tests.

5.9 All planning applications must be determined based on the local development plan (unless material considerations indicate otherwise). For something to be taken into account as a material consideration it must be relevant to planning and relate to the development proposed by the particular application under consideration.

5.10 As well as relating to material planning matters, any contributions sought as part of the planning application process must be proportionate – being fairly and reasonably related to the impact of the proposed development in question.

5.11 National Planning Framework 4 (NPF4) rebalances the planning system in favour of conserving, restoring and enhancing biodiversity, and promotes investment in nature-based

solutions, benefiting people. The emphasis of NPF4 biodiversity policies is on securing on-site enhancement, including by designing-in enhancement measures from the outset secured through the planning permission.

5.12 Where on-site measures alone are not sufficient, biodiversity/environmental improvements can potentially be secured through planning obligations – these are legal agreements entered into under section 75 of the Town and Country Planning (Scotland) Act 1997. Planning obligations may only be entered into where the relevant policy and legal tests are met. The tests provide that planning obligations may only be used where they are: necessary to make the proposed development acceptable in planning terms (i.e. without which planning permission would be refused); relevant to planning (address a material planning consideration); and proportionate to the scale and specific impacts of the particular development in question.

Utilising Building Control Regulations

5.13 From 1st February 2023, the Building (Scotland) Regulations were updated to more clearly define and control the energy and environmental performance of buildings. This includes, for example, new requirements for a delivered energy target for new buildings, improved fabric standards for new buildings and a new approach to on-site energy generation and heat network connections. While the Building Control Regulations offer a minimum standard requirement for the environmental performance of buildings, it is highlighted that the provisions of NPF 4 and in particular the requirements in relation to biodiversity enhancement present a more aspirational and strategic approach to natural carbon investment which goes beyond those standards established through Building Control.

Biodiversity Net Gain

5.14 The UK Government is working towards the roll out of Biodiversity Net Gain (BNG) in November 2023[22]. BNG is a way to contribute to the recovery of nature while developing land and will require developers to ensure habitats are in a better condition than they were before the development. Developers must try to avoid loss of habitat and if not, they must create habitat either on or off-site. If neither can be provided, as a last resort, statutory credits can be bought from the Government who will use this to invest in habitat creation elsewhere in

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[22] Department for Environment, Food and Rural Affairs (2023) Understanding biodiversity net gain

England. A biodiversity metric has been produced to enable the calculation of how a development or change in land management will change the biodiversity value of a site and will be used to calculate the amount of credits a developer must purchase[23].

5.15 The Scottish Government has commissioned research to explore options for developing a similar biodiversity metric or other tool, specifically for use in developing approaches to measuring biodiversity at the 'site' scale in Scotland.

Community Benefit Funding

5.16 Initial work is being undertaken by some organisations to establish whether community benefit contributions, particularly from renewable energy developments could be invested in Natural Capital assets to maximise the ecosystem service benefits for communities. While it is anticipated that the use of funds in this way could achieve transformational benefits for communities beyond what this funding is currently spent on, this approach is very new and further feasibility work needs to take place to ensure that investment of these funds would realise equitable benefits for communities and involve sufficient opportunities for communities to determine what the funds are invested in.

Payment for Ecosystem Services

5.17 Payment for ecosystem services or schemes (PES) involve financial incentives to land-managers to voluntarily maintain or improve ecosystems above and beyond what is required by regulatory compliance[24]. These services attempt to address the 'market failure' within the current UK economic system, where ecosystem and climate degradation are considered separate to economic activity. This means that addressing these issues will not be remedied by the economic market itself, and that direct intervention is needed from outside this system. The payment for ecosystem services outlined are an attempt to set up a separate economic market for the provision of ecosystem services. Ecosystem services are the benefits that society derives from nature. These can be broken down into four categories:

- Provisioning: Production of food and other material goods, such as timber.

- Regulating: Climate control, such as carbon sequestration or hazard prevention.

- Supporting: Water and nutrient cycles, soil formation.

- Cultural: Recreation and public amenity, cultural value.

5.18 Currently, payment for ecosystem services in the UK generally focuses on regulating services, with a particular focus on climate control and carbon sequestration/reduction.

Carbon Markets

5.19 Carbon markets exist for organisations with unavoidable emissions to buy carbon offsets in form of carbon units from projects that take carbon out of the atmosphere including carbon sequestration projects. There are two types of carbon markets – the compulsory carbon market, run under the UK Emissions Trading Scheme (UK ETS)[25], and the voluntary carbon market which includes has two accredited schemes including the Woodland Carbon Code and the Peatland Carbon Code.

Woodland Carbon Code (WCC)

5.20 The WCC is the government-backed quality assurance standard for woodland creation projects, launched in 2011[26]. It provides a framework for businesses and organisations to invest in carbon offsets in the form of high-quality carbon units from woodland projects. It is endorsed by the International Carbon Reduction and Offset Alliance[27] (ICROA) as such carbon sequestration from carbon code certified projects will contribute to the UK's targets for reducing emissions. The WCC is based on scientific forest research and uses a carbon model to estimate the amount of carbon sequestered by a woodland up to 100 years. Participants include the secretariat of the woodland carbon code, landowners, project developers, accreditors, and carbon buyers. To meet the requirements of the code, projects must:

- Register their project, stating the exact location and long-term objectives of their project;

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[23] Department for Environment, Food and Rural Affairs and Natural England (2021, updated 2023) Biodiversity metric: calculate the biodiversity net gain of a project or development
[24] ClimateXChange (2018) The 'Payment for Ecosystem Services' approach – relevance to climate change

[25] Scottish Government (2020) Climate change – UK emissions trading scheme
[26] UK Woodland Carbon Code website
[27] ICROA website

- Meet national forestry standards to ensure they are sustainably and responsibly managed;

- Have a long-term management plan;

- Use standard methods for estimating the carbon that will be sequestered;

- Demonstrate that the project delivers additional carbon benefits than would otherwise have been the case; and

- Maintain verification for the duration of the project.

5.21 Carbon credits come in two main forms in the code:

- A **Woodland Carbon Unit (WCU)** is a tonne of CO2e that has physically been sequestered in a WCC-verified woodland. WCU's can only be traded once the woodland project has reached certain time periods (every 10 years for example) and are retired once purchased and used by a company.

- A **Pending Issuance Unit (PIU)** is a *"promise to deliver"* a WCU in the future, based on the predicted sequestration of a project. It allows organisations to plan their emission reduction strategies.

Peatland Carbon Code (PCC)

5.22 The PCC is a government-backed voluntary certification standard for UK peatland restoration and management projects[28]. It exists to assure carbon market buyers that the benefits sold are high quality, real, and permanent. The concept behind the code is that restoring peatland will reduce GHG emission loss to the atmosphere from peat carbon stores. To meet the requirements of the code, a project must:

- Be an eligible peatland type;

- The project must be additional;

- Restoration activities must not conflict with other land management agreements; and

- Restoration must not be legally or contractually required.

5.23 Carbon credits for the PCC come in two main forms:

- A **Peatland Carbon Unit (PCU)** is a tonne of CO2e from a verified Peatland Code certified peatland.

- A **Pending Issuance Unit (PIU)** is a 'promise to deliver' a PCU in the future.

5.24 The benefits of the codes are that the minimum standards ensure that creation and restoration projects achieve the carbon savings stated and consumers can have confidence in the quality of offset they are purchasing. However, considerations need to be made when planning new projects including replanting woodlands in cases of catastrophes (such as fire or disease) and the possibility of buying back sold units.

Developing Markets

5.25 There is on-going research funded from DEFRA's Natural Environment Investment Readiness Fund[29] into developing carbon codes which will enable the development and restoration of other natural assets to be marketed and traded as carbon offsets. These include the UK Soil & Farm Carbon Code, Saltmarsh Carbon Code, and Hedgerow Carbon Code[30], with some projects such as the Hedgerow Carbon Code already in pilot[31].

5.26 Additionally, ongoing consideration into implementing a voluntary biodiversity market is being explored by the Scottish Government and partners which could open up further opportunities.

[28] IUCN website – Peatland Code
[29] Department for Environment, Food and Rural Affairs, Environment Agency and Natural England (2021) New £10 million fund to drive private sector investment in nature
[30] Environment Agency, Department for Environment, Food and Rural Affairs and Natural England (2021) Innovative nature projects awarded funding to drive private investment
[31] Game & Wildlife Conservation Trust (2022) Hedgerow Carbon Code: "good news for UK agriculture, climate change and British wildlife"

Landscape Enterprise Networks (LENS)

5.27 Landscape Enterprise Networks (LENS) are a system for organising the buying and selling of nature-based solutions[32]. LENS brings a wide range of private and public-sector organisations together to fund nature-based solutions within a given area. LENS then brokers negotiations, and eventually transactions, between these buyers and groups of landowners who are in a position to deliver them on the ground. LENS works by establishing and managing a regional trading system of collaborative value chains, each driving specific landscape outcomes for different groupings of businesses. LENS are established through three steps:

- Step 1: Network Opportunity Analysis – This involves a systematic process for understanding which sectors in a region have most at stake as a result of landscape performance, which landscape assets underpin that performance, and where there are cross-overs in interest for different businesses or sectors in the same landscape assets.

- Step 2: The Basic Operating Unit – A collaborative value chain – This step focuses on building a first 'anchor' value chain. In essence, the process involves working with 'demand side' interests to define a common specification for services; with the 'supply side' to define a service proposition; and then working with both to broker a deal.

- Step 3: Growing and Formalising the Regional Network – Building a functioning first anchor value chain creates momentum and interest and leads naturally to both extending the first value chain by attracting more customers and suppliers and building the next. It is at this point that some form of organisational infrastructure, and governance, is required to manage and broker trades in an equitable, transparent, and locally accountable manner.

Grant Funding

5.28 Several public bodies and third sector organisations provide grant funding for natural capital investment works such as those suggested in **Chapters 2 and 3**. Grant funds vary significantly by value and criteria and often they are only available to public or third sector organisations. They are usually competitively allocated and often several grant funds can be

stacked to fund larger scale projects. A full breakdown of all funds available in Scotland (at April 2023), their eligibility and criteria, is provided in **Chapter 9**.

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[32] Landscape Enterprise Networks (LENs) website

Chapter 6
Delivery Mechanisms Case Studies

6.1 The subsequent **Chapters 7 to 9** present case studies identified for their characteristics, with the aim of presenting a breadth of funding mechanisms and types of projects funded, including a range of natural capital and carbon offsetting investments. The case studies are intended to provide Moray Council examples of a full range of mechanisms they could take forward and the relative strengths and weaknesses of each in practice. The assessment of case studies has informed the recommendations provided in **Chapter 10**. The case studies presented were identified through a range of ways; client selection, previous knowledge of schemes, through the stakeholder engagement and via web search. Resources used to research and present these case studies included organisation and project websites, project case studies, monitoring reports, videos and webinars and research reports that explored carbon offsetting schemes and natural capital solutions, such as research carried out by the Centre for Sustainable Energy. These resources were used to identify a range of funding mechanisms, the outcomes delivered by each initiative's spending and any challenges and limitations that were faced.

Chapter 7
Delivery Mechanism Case Studies – Carbon Offsetting via Developer Contributions

Introduction

7.1 This chapter sets out five case studies, selected for their use of carbon offsetting via developer contributions, which are secured through planning obligations. It covers the mechanisms used, outcomes from their implementation and the challenges they faced. The case studies include the following locations:

- Milton Keynes;

- West of England;

- Southampton;

- Reading; and

- Greater London Authority.

Case Study 1: Milton Keynes

Overview

7.2 The Milton Keynes Carbon Offset Fund (COF), administered by the National Energy Foundation (NEF), was launched by Milton Keynes Council in 2008. The Milton Keynes Local Plan Policy SC1 states: Sustainable Constructions applies to all residential developments of 11 or more dwellings and non-residential developments with a floor space of 1000 sqm or more, requiring them to achieve:

- A 19% carbon reduction improvement upon the requirements within Building Regulations Part L 2013;

- A further 20% reduction in residual carbon emissions from onsite renewable energy generation or connection to a low carbon/renewable community energy scheme; and

- A financial contribution to the COF for anything after this point.

7.3 Requirements are fully set out in a Sustainable Construction Supplementary Planning Document (SPD) and the funds are managed by an in-house Council team by means of s106 agreements, unilateral undertaking or via the Milton Keynes Partnership tariff. However, the management, delivery and verification of projects are outsourced to the NEF. A new homes energy statement is used to specify the anticipated level of carbon which will be emitted by each home[34] within its first year of use. For each tonne indicated, the developer is to pay £200 per tonne into the COF.

Outcomes

7.4 The scheme has helped over 8,000 households in Milton Keynes to receive measures such as free energy efficient light bulbs, and subsidised loft and cavity wall insulation. It has also provided contributions towards the costs of new boilers. The COF is open to community groups/organisations, public organisations including schools, Milton Keynes Council, Parish and Town Councils, Milton Keynes charities and non-profits, and bulk domestic schemes within the borough. The COF tends to provide a maximum of 50% capital finance support for eligible organisations aiming to reduce their carbon footprint, although more funding may be offered at the discretion of the board. The COF is generally intended to be spent on projects that satisfy social need, with high visibility or education value, in particular, projects that encourage community engagement and create knowledge sharing networks.

Challenges

7.5 Challenges for the Milton Keynes COF included initial limitations on the use of the fund, creating a barrier to more innovative use of the money. Some costs, such as solid wall installation and hard-to-treat cavity walls are more expensive than the required cost per tonne gained under the COF. However, in more recent years the scheme's partners have found ways around these barriers. For instance, a fund for solid wall insulation is available with £500 provided towards the costs of these measures[33].

Case Study 2: West of England

Overview

7.6 The West of England (WoE) Authorities; Bristol, Bath and North-east Somerset, South Gloucestershire and North Somerset Councils; are in the process of developing net zero policies. Specifically, the WoE Authorities are considering developing net zero policies based around a framework proposed by the London Energy Transformation Initiative (LETI)[34]. The Centre for Sustainable Energy (CSE) has been helping to develop a consistent approach for the WoE authorities by considering the possible implications of developing an energy offsetting regime, rather than the traditional carbon offsetting approach. For clarity:

- **Carbon offsetting**: A fixed price in £/tonne of CO_2 is set based on the avoided costs of generating those equivalent savings locally. This is a recognised metric that can be linked to universal carbon pricing (i.e., easily compared and traded between non-energy sectors e.g. peat restoration). It is also compatible with embodied energy offsetting. CSE are of the view that these traditional offset funds are flawed and difficult to administer due to challenges with ensuring genuinely 'new' and 'additional' carbon savings at the rate necessary to offset emissions. They therefore advise that an 'energy offsetting' approach is more suitable for the WoE authorities.

- **Energy offsetting/LETI approach**: Energy demand not met from on-site renewable energy must be met through investment in off-site renewables, i.e., a kWh shortfall can be matched with the equivalent kWh of generation 'credits' offsite. There is no fixed cost with this approach and the emphasis is on the developer to evidence additional investment in offsite generation at the time of construction. With tight building fabric efficiency and heat demand standards for new development, a much higher proportion of development will be able to meet its operational energy needs from on-site renewables. Therefore, investment in off-site energy offsetting to make up for any shortfall would be a very last resort.

7.7 As such this LETI approach aims to use an energy metric that has a quantifiable means of ensuring that new development is net zero in terms of operational emissions, rather than using a carbon policy framing and the UK Net Zero Buildings Standard. The basic rationale behind

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[33] Energy Magazine

[34] Centre for Sustainable Energy (2022) Carbon offsetting report – Carbon offsetting within an energy intensity policy framing

using this approach, over carbon offsetting, is that *"if new development can be powered entirely from renewable sources (either on or off-site), it will be zero carbon, at least in terms of its operational energy use"*[35].

Outcomes

7.8 The CSE Carbon Offsetting report to the WoE Authorities was published in June 2022. Therefore, the implementation of energy offsetting within any of four the local planning authorities is not particularly advanced. However, CSE have advised on some outcomes and potential benefits of adopting this approach across the region.

7.9 CSE provided calculations to estimate the pot size and carbon price across the local authorities. Using the price of solar PV installations, a £0.091/kWh was advised (subject to review every 6 months). Therefore, the calculation for a development to fund off-site renewables to achieve net zero targets would be: Annual residual electrical demand (kwh) X 0.091 (offset rate) X 30 (lifetime of development). The size of the energy offset fund could range significantly dependent on the rate of compliance with on-site net zero standards for new development and the rate of growth across the region.

7.10 The energy offsetting approach offers an offsetting system that is easy to check and monitor at the planning stage, as energy offsets can be directly matched against onsite kWh reporting. There are currently no examples, other than Cornwall Council, where LETI-style planning policies have been advanced far enough to set out how authorities intend to secure additional renewable energy capacity. The approach being considered by WoE Authorities is similar to that of Policy SEC1 of the Cornwall Climate Emergency Development Plan which recommends that the fund is used to fund solar photovoltaic panels on new buildings and large-scale renewable energy generation. It recommends **against** using the fund for retrofit of existing buildings, reduction of energy demand, solar photovoltaic panels on existing buildings or reforestation/afforestation/peatland restoration.

Challenges

7.11 The energy offsetting approach does not benefit from being a recognised metric like the traditional carbon offsetting approach, which is recognised by investors and can be linked to universal carbon pricing[36]. Additionally, the energy offsetting approach does not necessarily deliver some of the co-benefits offered by nature-based solutions for carbon offsetting, such as woodland creation (e.g. biodiversity net-gain (BNG)), and renewable energy development may have to mitigate some of their own adverse environmental effects, the approach could implement some of these benefits if the landholding on which renewable energy development takes place is managed to deliver them, e.g. delivering BNG.

Case Study 3: Southampton

Overview

7.12 Southampton City Council has implemented carbon offsetting since 2012 via their Adopted Core Strategy Policy CS20. On site developments must meet BREEAM 'Excellent' standards for non-domestic development or 19% improvements on 2013 Target Emission Rates for domestic development. The remaining emissions can then be offset through the Southampton Carbon Offset Fund, designed to provide flexibility and to reduce development costs compared to strict zero carbon standards for new developments. In 2015, the approach was amended to apply only to new developments of over 10 dwellings or 1000 sqm in accordance with national guidance.

7.13 The Southampton Carbon Offset Fund offsets one year of emissions rather than the lifetime of the development, at a cost of £210/tCO2 in the first year of development, made through the Section 106 mechanism (includes a management fee of £31.50 per tonne). A hierarchy was suggested requiring a high standard of energy efficiency first, on-site carbon reductions second, and payments to the local fund as a last resort.

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[35] Centre for Sustainable Energy (2022) Carbon offsetting report – Carbon offsetting within an energy intensity policy framing (page 13)

[36] South West Energy Hub (2021) Net Zero New Buildings

Outcomes

7.14 The fund is administered externally by The Environment Centre, enabling Southampton City Council to work with a partner already working closely with the Council on fuel poverty projects. This has enabled the fund to be combined to assist vulnerable households who would otherwise not be able to afford retrofitting measures.

7.15 Initiatives that benefit from the scheme largely include retrofitting energy efficiency measures such as insulation, replacement boilers and renewable technologies. Additionally, the fund has been used to support vulnerable, fuel poor, residents to improve the comfort of their homes, reduce energy bills and alleviate issues associated with fuel poverty. This complements several other Southampton City Council initiatives and improves the health and wellbeing of local residents.

Challenges

7.16 When compared against other local authorities that have implemented carbon offsetting schemes, Southampton had one of the lowest carbon offset prices (£210 one off payment - equivalent to £7 per tonne CO2 x 30 years) as the fund offsets one year of emissions rather than the lifetime of the development. However, research conducted by CSE suggests that when individual council officers were interviewed about their carbon offset fund, Southampton officers were happy with their unit price.

Case Study 4: Reading

Overview

7.17 Reading Borough Council has implemented their own planning requirements that require all new residential homes (developments of ten or more homes) to be built to zero carbon standards if possible. This is set out in the Reading Borough Local Plan 2019. The Local Plan is supported by a revised Sustainable Design and Construction SPD which contains more detail on achieving these zero carbon standards. Where the developer designs homes that are not carbon neutral then the development must deliver, as a minimum, a 35% improvement in the

dwelling emission rate over the 2013 Building Regulations, plus a contribution of £1,800 per tonne towards carbon offsetting within Reading (calculated as £60 per tonne over a 30 year period) via S106 payment where necessary.

Outcomes

7.18 These contributions are ringfenced for projects in Reading which deliver energy-efficiency improvements or renewable energy such as retrofitting existing housing, provision of energy saving advice, heat pump installation, renewable and low-carbon energy generation, energy projects for community buildings (e.g., installation of solar panels), installation of electric vehicle charging infrastructure, and tree planting and greening measures.

Challenges

7.19 The implementation of this policy within the Reading Borough Local Plan has resulted in the majority of new homes in the borough meeting the criteria to apply the zero-carbon policy. However, between April 2020 and March 2021 a relatively low number of homes (165 units in five developments) were granted planning permission. While all development conformed to the zero carbon standards the scale of housing development required in Reading over the coming decade (16,000 units between 2020 and 2036) will increase the impact of the policy and further evaluation will be required to establish if the requirements remain effective.

Case Study 5: Greater London Authority

7.20 The most well-established carbon offsetting approach through the planning system in the UK is that used by the Greater London Authority (GLA). This has secured over £145 million for carbon offsetting since October 2016[37]. Approximately £55.2 million of this was collected or secured for collection between 2020 and 2021, equating to a 61% increase in the fund over the course of the year.

7.21 The GLA carbon offsetting scheme is a recognised means of how the planning system can leverage carbon reductions.

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[37] Greater London Authority (2023) Carbon Offset Funds Report 2021

Overview

7.22 The London Plan requires all major developments[38] to achieve net zero carbon. There is a minimum requirement for a 35% on-site carbon improvement on national Building Regulations. Once on-site carbon reductions have been maximised, the shortfall to zero carbon is offset by making a cash-in-lieu contribution to the relevant Local Planning Authority's (LPA) carbon offset fund. Developments are however expected to maximise on-site savings before paying to offset residual emissions. As of 2021, the net zero carbon target also started applying to all major non-residential developments and so developers have been making payments accordingly.

7.23 The London Plan requires LPAs to[39]:

■ Set up a carbon offset fund to collect carbon offset payments from developers to meet any carbon shortfall from new development and ring fence these funds to secure delivery of carbon savings within the relevant LPA; and

■ Set a price for carbon, i.e. price per annual tonne of carbon, that developers pay to make up any shortfall in on-site carbon savings, securing contributions through Section 106 agreements.

7.24 The Mayor's guidance price for offsetting carbon is £95 per tonne (previous to the new London Plan it was £60 per tonne). However, LPAs can also apply their own locally set costs of carbon. For instance, Lewisham charges £104 per tonne and Islington takes a different approach that factors in unregulated emissions[40] as well as regulated emissions[41]. The GLA indicates that the overall funding contribution should be calculated over 30 years (the assumed lifetime of the development's services). For example, using the GLA's recommended price equates to £95 x 30 years = £2,850 per tonne of carbon to be offset.

7.25 It advises further *"LPAs should either establish a dedicated carbon offset fund or administer the funds through their Section 106 processes. In either case the funds should be ring-fenced for the sole purpose of delivering carbon reduction projects… LPAs are encouraged to pool offset payments, rather than specifying in a Section 106 agreement the project which will offset the development's shortfall in emissions"*.

7.26 The local authority should also identify a suitable range of projects that can be funded through the carbon offsetting fund and put in place suitable monitoring procedures to enable reporting to the GLA.

Projects Funded

7.27 The total GLA carbon offset fund expenditure was £19.3 million from the schemes inception until 2021. This meant an approximate £5.5 million of this was spent between 2020 and 2021, demonstrating that there has been an increase in spending. **Figure 6.1** below illustrates the most common direction of funding across the GLA.

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[38] Those with ten or more units or those with >1000sqm. of floorspace.
[39] Greater London Authority (2018) Carbon Offset Funds – Greater London Authority guidance for London's Local Planning Authorities on establishing carbon offset funds
[40] Unregulated emissions are the emissions from fixtures or appliances within a building i.e. non-building-related systems. The contribute towards a building's carbon footprint however cannot be controlled through

design of the building as occupants lifestyle choices are not pre-determined by energy efficiency measures associated with construction.
[41] Regulated emissions are building-related emissions including heating, domestic hot water supply, air conditioning, ventilation, lighting and auxiliary systems.

Figure 7.1: Types of projects funded by the GLA carbon offset fund[42]
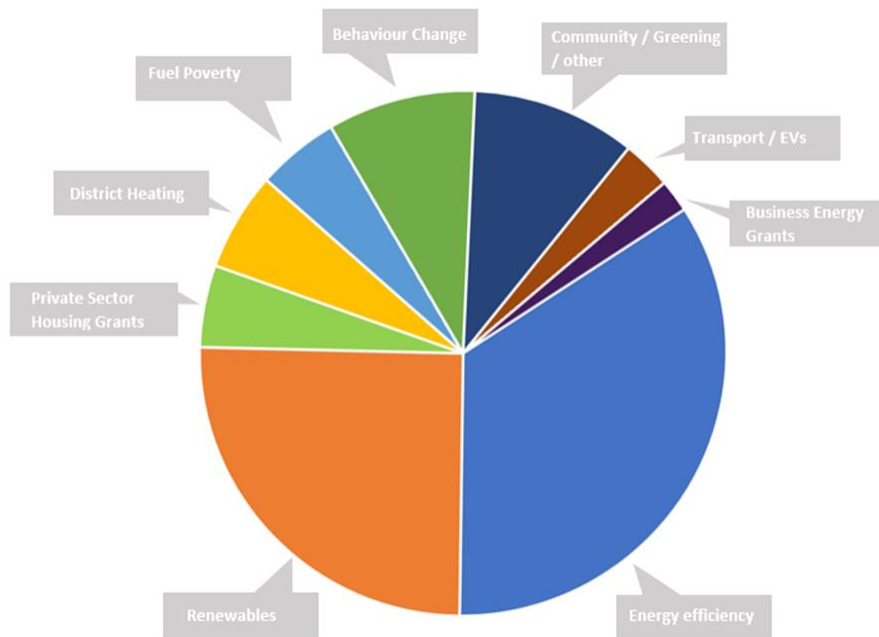
7.28 The most popular use of funding was for projects on schools and LPA corporate estates, mainly involving energy efficiency improvements. The GLA recommends that funds are targets towards energy efficiency, renewable energy and district heating projects to help reduce the cost of living and to support schools and other public institutions, and *"Projects with less tangible carbon savings (e.g., behaviour change), or improving resilience (e.g. tree planting, greening) can be funded but should not benefit from the majority of an LPA's fund"* (p.17).

7.29 Going forward, the GLA aims to encourage LPAs to consider strategic pooling funds with other LPAs to deliver strategic, sub-regional or London-wide green recovery objectives. Only three LPAs in the 2021/22 monitoring report reported that they were considering this approach.

7.30 LPAs are also encouraged by the GLA to co-fund projects using other funding sources as a priority. In the 2022 Monitoring Report, 28 LPAs confirmed they were supportive of co-funding, with several reporting it is already happening. Other sources of funding to combing with have included Energy Company Obligation (ECO), GLA Warmer Homes Fund, Go Ultra Low City Scheme (GULCS), Green Homes Grant, Heat Networks Delivery Unit (HNDU) and many more.

7.31 Examples of projects funded through carbon-offset funding in the London Borough's of Camden and Merton are outlined below.

Camden Council

7.32 Camden's Climate Fund is financed by Camden's carbon offset payments. The Camden Climate Fund provides up to a 50% discount of costs to reduce the carbon inside homes, businesses and community spaces in Camden. It can contribute to measures including improved insulation, the installation of heat pumps, solar photovoltaic panels and solar thermal systems. Funds can be applied for via. a Household Energy Efficiency Grant, a Business Grant, a Community Energy Grant, or a Community Climate Action Grant.

7.33 In late 2021/early 2022, Camden had collected £2,331,686 and had secured by legal agreement (but not yet collected) £2,825,296. However, Camden's total committed expenditure was only £153,000, meaning the percentage funding spent is low compared to what has been collected. Between 2016 and 2019, Camden had collected £511,373, with a total of £2,208,307 secured by legal agreement but not collected at this time. This demonstrates that a large proportion of funds have been collected in recent years, with some time lag expected between collecting the funds and spending them appropriately. Spending levels are expected to increase in coming years as spending channels become more established.

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[42] Figure adapted from Greater London Authority (2022) Carbon Offset Funds: Monitoring Report 2021.

7.34 Additionally, the total expenditure figure for Camden had decreased from £313,222 in 2020 to £153,800 in 2021 as some large legal agreements signed had been collected, thereby reducing the amount of outstanding payment.

Merton Council

7.35 The Merton Climate Strategy and Action Plan[43] was adopted by the Council in November 2020, setting out how the Council will work towards a reduction in GHG and adapt to the effects of climate change. In late 2021/early 2022 Merton had collected £377,871 and had secured by legal agreement (but not yet collected) an additional £299,715. At the time Merton had only spent, or had committed to a specific project, £82,000[44].

7.36 In 2022, a recommendation was made to allocate £150,000 of Merton's carbon offset funds as top-up funding for the Green Homes Grant Local Authority Delivery (LAD) to retrofit fuel-poor homes in Merton. These funds were considered to be funding of last resort where funding for works exceeded the maximum allowances through national funding streams (e.g., LAD, ECO, Warmer Homes)[45].

Outcomes and Monitoring

7.37 All projects financed by the offset fund must be able to demonstrate that they will save carbon once they are funded. 22 LPAs confirmed that carbon savings will be verified post-installation and seven confirmed this monitoring is already taking place. However, as of late 2021/early 2022, 13 LPAs did not have any auditing process in place. Five LPAs have ensured that monitoring and evaluation is specifically detailed in their funding agreements.

7.38 GLA guidance advises that offset payments must be spent on projects that *"would not have occurred without the offset funding, would not have occurred under a business as usual scenario, and are not required in order to meet national legislation"*[46]. Therefore, determining whether a project offers this additionality is a key component of the effective governance of the project. These tests may be time-consuming and expensive, however are necessary to ensure that funded projects achieve qualifying carbon reductions.

Challenges

7.39 LPAs reported some initial challenges with spending their funding however good progress is expected as LPAs increasingly align their funding priorities with their responses to the climate emergency. As of late 2021/early 2022, 21 of the 35 LPAs in London had begun spending their offset funds[47]. This figure was only 15 in 2020. There have been challenges reported by several of the LPAs in spending the funds due to lack of staff resources, COVID-19, an absence of governance structure within the LPA, or waiting for a sufficient level of funding to be accumulated to deliver a project of significant scale. Two LPAs reported that they had not yet collected any funds. 13 LPAs had reported combining offset funds with other funding sources to maximise their impact. Some developers have taken an alternative approach where the LPA has agreed they may undertake a project off-site to meet their shortfall in emissions, instead of paying to the fund. This must be agreed by the LPA first and should deliver carbon savings.

7.40 There have also been challenges related to the set price of carbon. Several LPAs reported that the initial adopted carbon price, prior to the new London Plan (£60 per tonne per year rather than £95) was too low to fund like-for-like carbon savings.

7.41 Additionally, as discussed in relation to the West of England case study, CSE have identified some flaws with the carbon offsetting approach as a whole. CSE suggest that traditional carbon offset funds are flawed and complex to administer, particularly in relation to ensuring that carbon savings are generally **new** and **additional** at the rate necessary to offset emissions from new development and to monitor the pace of emissions savings achieved. Citing London, where this traditional carbon offsetting approach has been operating the longest in connection for the planning system, CSE confirms that these flaws do not appear to have been overcome[48].

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[43] Merton Council (undated) Merton Climate Strategy & Action Plan
[44] Greater London Authority (2022) Carbon Offset Funds: Monitoring Report 2021
[45] Merton Council (2022) Climate Delivery Plan – Year 2
[46] Greater London Authority (2018) Carbon Offset Funds – Greater London Authority guidance for London's Local Planning Authorities on establishing carbon offset funds
[47] Greater London Authority (2023) Carbon Offset Funds Report 2021
[48] Centre for Sustainable Energy (2022) Carbon offsetting report – Carbon offsetting within an energy intensity policy framing

Chapter 8
Other Delivery Mechanisms – Summary Case Studies

Introduction

8.1 This chapter sets out five case studies which illustrate delivery mechanisms, their benefits and challenges based on a range of different models at varying scales and include two case studies within Moray. The case studies include:

- Ashill Habitat Bank;

- Findhorn Watershed Initiative;

- Trees as Infrastructure;

- Highland Carbon; and

- Spey Catchment Initiative.

Case Study 6: Ashill Habitat Bank

8.2 This case study was selected due to its unique use of section 106 funding for a specific purpose; small scale habitat compensation for Cirl Buting from housing development.

Overview

8.3 The RSPB, Finance Earth and Teignbridge Council have worked closely together to bring forward one of the first examples of up-front private investment being supported by S106 payments towards a nature-based outcome.

8.4 RSPB purchased Ashill, a 37-hectare site in Devon, through its cash balance in 2017. This was refinanced by Lloyds Bank in 2020 and this loan is being repaid over five years via Section 106 funding from Teignbridge District Council. Ashill was acquired to help offset the impact of housing expansion in the local area on the loss of cirl bunting (a protected farmland bird species under threat from development activity). Therefore, the main revenue stream for the

project built on 'mitigation payments' from property developers that will cause harm to the cirl bunting.

8.5 Additional revenue was also received in the form of rental payments from farms managing the land under a Farm Business Tenancy. Cirl bunting can thrive alongside agriculture practices although the lease set out suitable farming practices. This second stream of funding makes the model more appealing to all stakeholders.

Figure 8.1: Project financing structure[49]
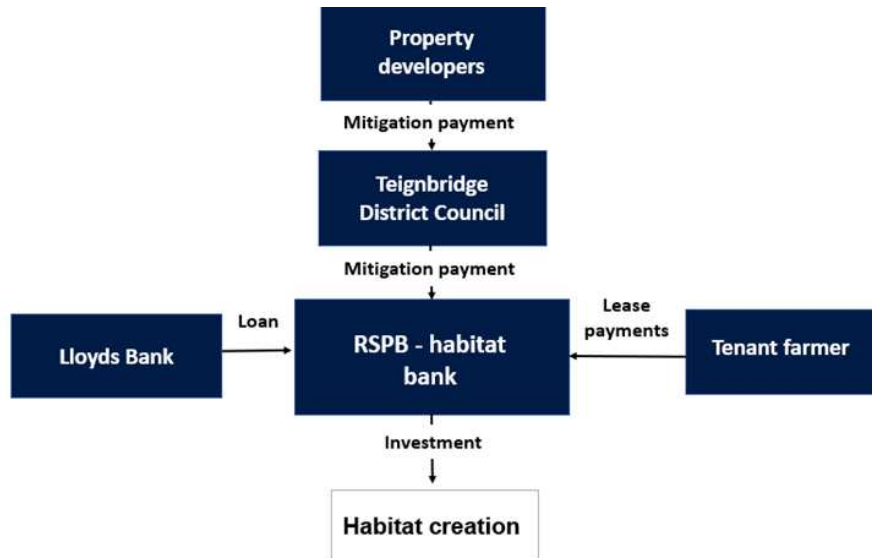
Outcomes

8.6 The income stream agreement between the RPSB and Teignbridge District Council set out certain performance metrics relating to the bird population. It was agreed that the RPSB (habitat

bank operator) would safeguard the 52 pairs of cirl bunting living within 2km of the site and would increase the number of breeding pairs within a defined period.

8.7 This model has been beneficial to Teignbridge District Council, responsible for the deployment of S106 funds for compensation measures. Traditionally, councils have often struggled to spend S106 funds with significant amounts often remaining unallocated within the planning system. The habitat bank system has removed the time gap between the damage caused by the developer to the local environment and the establishment of a compensatory habitat. Thus, reducing risks of failing to ensure no net loss of cirl bunting habitat.

Challenges

8.8 As a leader in the project, Finance Earth, together with the RSPB, developed this new 'habitat bank' financing mechanism. Project risks were associated with the scheme being an innovative financing model and associated risks with taking on a loan.

8.9 There was a high degree of uncertainty about the timing of mitigation payments from the Council, which is highly dependent on the timing of demand from developers. Finance Earth provided an analysis of forecasted planning applications and impacts of proposed developments was assessed, taking into consideration that S106 payments are not required until the housing unit(s) is sold. Therefore, whilst there was confidence in the level of mitigation payments expected, there was less confidence in the timing of these payments. Nevertheless, it was estimated that enough mitigation payments would be made within the five-year time period, enabling the RSPB to meet it obligation to Lloyds Bank.

Case Study 7: Findhorn Watershed Initiative

8.10 This case study, the Findhorn Watershed Initiative, covers an emerging local initiative taking place within the Moray area. The initiative focuses on carbon sequestration and habitat restoration on the River Findhorn corridor.

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[49] Figure adapted from Green Finance Institute website – Milestone 05 – Ashill Habitat Bank – Develop Business Case and Financial Model

Overview

8.11 The Findhorn Nairn and Lossie Rivers Trust published their Management Plan 2021-26 which set out the Trust's focus on improving the health of the wider river catchment area and ecosystems it contains. The Trust has recently launched their most recent project, the Findhorn Watershed Initiative.

8.12 £970,000 of funding was secured from the Scottish Government's Just Transition Fund (JTF) - a policy programme set out in the Bute House Agreement to provide a 10-year £500 million JTF for the North East and Moray – which enabled the Trust to pursue the project. The JTF was set up due to the recognition of the need to diversify the economy of the region away from carbon-intensive industries. The JTF prioritises partnership working, supporting capacity building, and supporting projects that are informed by a just transition vision for the North East and Moray.

8.13 The Trust is looking to work in collaboration with communities, landowners, businesses, farmers, land managers, local authorities and education institutions to deliver ecosystem upgrades to tackle the climate crisis and threats to biodiversity, particularly Wild Atlantic Salmon populations.

Outcomes

8.14 The project aims to pursue an ambitious large-scale scheme of carbon sequestration and habitat restoration, from river source to the sea. It aims to deliver a *"long-term, integrated, landscape-scale vision for ecological restoration across 1,300 sq.km. of the Scottish Highlands"*[50]. This will start with the creation of 'riverwoods' riparian woodlands in the upper catchment of the River Findhorn.

8.15 As funding has been received from the JTF, the Scottish Government has ensured monitoring of year one projects will take place and learning from year one projects will be applied to future development of the JTF.

Challenges

8.16 This project is still at an early stage of inception, with one of the first major challenges being securing funding from the Scottish Government. The project aims to bring together a wide variety of stakeholders which will require coordination and collaboration to deliver the best outcomes across the catchment, reflecting landowner and local interests.

Case Study 8: Trees as Infrastructure (TreesAI)

8.17 Trees as Infrastructure (Trees AI) is an open source model that aims to support municipalities with urban tree-planting and maintenance. It is an innovative model for urban greening utilising technology and data and the pilot project is taking place in Scotland, in partnership with Glasgow City Council.

Overview

8.18 Urban forests regulate several ecosystem processes (e.g., water and air quality) and provide tangible and intangible benefits vital for living environments. Trees as Infrastructure (TreesAI) establishes nature as a critical part of urban infrastructure, alongside bridges, roads and rail, enabling investment, profitability and sustainability. TreesAI is a cloud-based platform, built to address declining tree numbers, and support the expansion of urban forests. The goal is to establish trees as assets with a variety of values. TreesAI connects nature Stewards who develop urban forest projects with investors and nature beneficiaries interested in the delivery of environmental services.

8.19 TreesAI Steward will allow council officers, landowners, project developers, community groups and NGOs to map the forecast impact of their urban forest projects and source funding. The TreesAI beneficiary will allow a variety of organisations to green their investments and operations, via trusted secure and local portfolio of projects.

Outcomes

8.20 TreesAI is partnering with Glasgow City Council to help the city meet its climate targets through its pilot study. The project is due to start in 2023 with a 5 year investment period. The

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[50] Findhorn Watershed Initiative website

total investment target is expected to be £5 million from public and private sources with the key impact being natural flood management. The portfolio aims to deliver social, healthcare, and economic benefits to local communities creating green jobs, access to green spaces, improving mental well-being and increasing local biodiversity. The portfolio contains street trees, woodland, sustainable urban drainage systems (SUDs) and the preservation of trees in vacant and derelict land. TreesAI wants to diversify the efforts to create urban forests by maintaining existing trees while planting new trees. TreesAI ensures that any trees planted are monitored and their development is logged, to enable better and more successful creation of urban forests. Financing urban forests and not maintaining them will not result in positive benefits for climate change.

Challenges

8.21 There are a number of reasons why urban areas are struggling to increase urban forest growth. These include:

- Urban trees are seen as a cost rather than an asset. This can result in the planting of small tree species that are easier to maintain and therefore not enhancing street canopy cover or biodiversity.

- The focus is on the number of trees planted rather than maintaining the trees planted.

- Bulking the benefits from the planting of urban trees can create issues when gathering funding for the development of green infrastructure. This is because beneficiaries tend to want to provide funding towards one benefit such as reducing flooding levels by planting street trees.

8.22 The adoption of the TreesAI platform services will be gradual as they require the emergence of new practices in the public, private and civic sectors. The creation of urban forests will require the involvement, investment and care of the many organisations that are present within the urban environment, from communities to landowners, and from multiple public sector bodies through to the private sector.

Case Study 9: Highland Carbon

8.23 Highland Carbon is a company which has been operating in the voluntary carbon offsetting markets since 2017. This case study illustrates a well-established carbon offsetting company

which has been involved in a range of carbon offsetting projects within Scotland, the UK and internationally.

Overview

8.24 Highland Carbon uses expertise to shape and examine carbon offsetting projects throughout the UK. Highland Carbon is a private limited company. Highland Carbon is engaged in a range of projects in the UK and across the world, working on projects of varying size, e.g. from 68 hectares to over 300 hectares. Highland Carbon projects aim to bring significant community economic development benefits to the UK's remotest communities through forestry and peatland restoration. Representing more than 50% of Scotland's land area, the Scottish Highlands has only 9% of its population while year-round employment opportunities are not as readily available. Highland Carbon aims to bring employment to local people to undertake work that supports environmental activity, such as: deer fence installation, tree planting, earth moving, and ecological assessments.

8.25 Nature based carbon offsetting projects are important to reverse the depletion of the UK's natural environment. Highland Carbon helps clients to achieve engaging content for Environmental Social Governance (ESG) and Sustainable Development Goal (SDG) reporting. They also support clients' communications by producing content that can be made available for public relations, investor relations, employee engagement, customer engagement, and digital campaigns. Highland Carbon's projects are within the frameworks of the Woodland Carbon Code and Peatland Code. Highland Carbon sets out to achieve educational, health and wellbeing outcomes via partnerships with Highland Outdoor & Wilderness Learning (HOWL) and EarthSelf.

8.26 Carbon offsetting projects are intended to develop substantial capital for estates whilst increasing their natural capital value. If the natural capital value increases, Highland Carbon will increase the retail price on clients' behalf. Highland Carbon offers a full service from project conception to design, implementation and brokerage service. They support landowners to scope out the opportunities and to complement other aspirations for their estate, such as renewable energy, farming and eco-tourism. The funds generated can help estates to develop other opportunities such as renewable energy, events businesses, ecotourism and improved farming. Local residents can also benefit from both project creation and project maintenance. Highland Carbon acts as a broker service between a private investor who will help fund the

work and the landowner. Highland Carbon aims to generate substantial revenue through buying carbon credits from the Woodland Carbon Code and Peatland Code projects that can then be invested in projects for restoring and rewilding nature. These funding opportunities are made available to the landowners to support their own team to deliver the project or Highland Carbon can arrange for the project work to be done on the estate.

8.27 Highland Carbon also offers opportunities to businesses for them to support the planting of trees. This is done within their Trees for Doncaster Initiative. This initiative offers two options:

- Support one tree to be planted in Loversall, Doncaster for every 20 tonnes of carbon offsetting that they purchase from the Woodland Carbon Code projects located in Scotland, or via our international offsetting projects; or

- 'Sponsor a tree' with a minimum purchase of five trees.

8.28 Highland Carbon also runs a subscription service for the public to offset their household carbon footprint called TreeWilder.

Outcomes

8.29 Some of Highland Carbon's projects include:

- Traquair Forest Project – A 246 ha site of planting a diverse range of broadleaf riparian woodland. The project would offset a total of 66,066 tCO2e.

- Tay Forest Project – New woodland planting comprising of 202 ha, 493,440 trees and offsets 36,348 tCO2e.

- Broad Hill Woods – The planting scheme comprises a combination of mixed conifers, to achieve rapid growth and timely carbon sequestration, alongside mixed native broadleaves covering 66 ha.

- Loch Ness Afforestation – A two-phase native woodland restoration project just to the south of Loch Ness covering a total of 92 ha offsetting 20,092 tCO2e.

- Galloway Coastal Forest – A large area of woodland planting containing mixture of conifer planting and riparian broadleaves offsetting 213,754 tCO2e.

- Gleann Eanaich Peatland, Aviemore – A peatland restoration project spanning 300 ha offsetting 90,000 tCO2e.

- Buckny Burn Peatland Restoration, Perthshire – A peatland restoration project spanning 90 ha offsetting 40,000 tCO2e.

- Achanalt Peatland Restoration – A 240 ha peatland restoration project in Wester Ross offsetting 50,963 tCO2e.

- Blue Slate Wood – The Blue Slate Wood comprises a permanent and diverse native broadleaf planting scheme in Lancashire. The project has an offsetting capacity of 1,607 tCO2e.

- Blackford Forest – The Blackford Forest Project is located West of Gleneagles village, East of the Trossachs National Park. The project entails three new woods, comprising 192 ha and all located within 2km of each other. Its offsetting capacity is 38,162 tCO2e. The project will comprise 489,744 trees.

- Pitlochry Afforestation – The project is located west of the Cairngorms National Park compromising of 135 ha. The project will see the planting of native trees offsetting 48,706 tCO2.

Challenges

8.30 There is no explicit legal framework for the ownership of carbon or rights to carbon. Therefore, control over land brings control over the ability to pursue activities to sequester carbon.

8.31 One of the challenges with Highland Carbon projects is that providing biodiversity enhancements and offsetting carbon provides initial benefits to landowners and may not benefit local communities. Rising land values and potential new revenue flows could encourage some existing landowners to hold on to land. Equally it could encourage others to sell. However, high demand, low supply and high land values are likely to make it more difficult for communities and individuals to acquire land in the market. There is a risk that the financial benefits of Scotland's natural capital could be narrowly distributed and extracted from local economies, or exported out with Scotland, rather than be reinvested.

8.32 It is important that decisions are not made on the basis of carbon alone but seek to deliver multiple benefits for carbon, nature, communities, and economies. While these objectives can and should be mutually achievable there is a risk they are seen to be in competition. There is a risk that in the rush for carbon, action is taken unilaterally, missing the landscape scale opportunities and ultimately delivering less. On the ground, mutually beneficial opportunities may be missed, meaning that local businesses and communities could not benefit and feel not included in decision making.

8.33 Recognising these challenges, The Scottish Government has developed interim principles for responsible investment in Natural Capital which will help to deliver policy goals for economic transformation, climate changes and biodiversity that provides community benefits and supports a Just Transition[51].

Case Study 10: Spey Catchment Initiative

8.34 This case study presents an established natural capital initiative taking place locally, in the Highlands and Moray, facilitated by a mix of grant funding from public and private sources.

Overview

8.35 The River Spey Catchment Initiative is about making the River Spey Catchment area better for nature and people. The River Spey is Scotland's 3rd largest river with a catchment area of over 3,000km^2. The whole river is protected under European legislation as a Special Area of Conservation (SAC) in recognition of its importance for four threatened wildlife species, Atlantic salmon, otters, freshwater pearl mussels and sea lamprey. Many parts are also Sites of Special Scientific Interest (SSSIs) because of their outstanding nature, and about two thirds of the catchment lies inside the boundary of the Cairngorms National Park. The catchment area has several important economic activities such as tourism, agriculture, forestry and food and drink. Up to 70% of the water in the River Spey is diverted from the upper catchment for generating hydro power.

Figure 8.2: Photo of Speyside catchment area

8.36 The initiative covers the River Spey catchment area from just south of Newtonmore in the Cairngorms National Park towards where the River Spey meets the Moray Firth. The Spey Catchment Initiative was established in 2010 to take forward key actions from the 2003 Spey Catchment management Plan. A new Spey Catchment Management Plan was adopted for the five year period 2017-2022. The new Plan sets out the regulatory framework, the key issues and opportunities which characterize the catchment, and importantly the agreed objectives,

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[51] Scottish Government (2022) Interim Principles for Responsible Investment in Natural Capital

actions for achieving them and lead partners for their delivery. The Spey Catchment Initiative is run by a steering group of representatives from the following partners:

- Cairngorms National Park Authority;

- Diageo;

- Spey Fishery Board;

- NatureScot;

- Forestry and Land Scotland;

- Highland Council;

- Moray Council;

- NFU Scotland;

- RSPB;

- SEPA;

- Scottish Forestry; and

- Woodland Trust Scotland.

8.37 The steering group coordinates action and engages with the wider stakeholder group of landowners, managers, recreational users, communities and industry. The steering group also acts as an opportunity for cross-sectoral discussion of issues affecting the whole of the Spey catchment. The Spey Catchment Initiative plays a key role in delivering projects while also facilitating other organisations to act. The strong relationship with partners has proven invaluable in streamlining delivery of projects, not least as a positive advantage when it comes to attracting funding. Funding comes from a variety of public and private sector organisations such as the Scottish Government, NatureScot, Cairngorms National Park Authority, The Macallan, SEPA, Heritage Lottery Fund, Crown Estate Scotland, Speyburn (Speyside Single Malt Scotch Whiskey), and Spey Fishery Board. In the past, the Spey Catchment Initiative has been awarded £80,215 in funding from the Scottish Government.

Outcomes

8.38 The main aim is to deliver projects which restore the natural form and function of the River Spey while enhancing the river corridors habitats. Since its establishment the Spey Catchment Initiative has delivered or facilitated several successful on-the-ground project including riparian woodland creation, river restoration, removing man-made barriers to fish migration and improving access to the river for recreation. Some of the current projects in the Spey Catchment Initiative are:

- Delliefure Burn Floodplain Restoration – Restoration of a 330m stretch of burn and its floodplain.

- River Calder Restoration: Riparian Woodland Creation – Planting along a 4.5km stretch of the river and deer fencing creating 22ha of enclosed area.

- River Calder Restoration: Habitat Enhancement – Installing Large Wood Structures along 1.6km of the River Calder.

- Aviemore Spey Access Point Enhancement and Willow Spiling Project – Restoration of a recreational river access point and use of 'green engineering' design for bank stabilisation beside the access point.

8.39 Some of the previous projects within the Spey Catchment Initiative include:

- Kinchurdy Farm Riparian Woodland Creation – Livestock fencing for 4.5km of the river bank to reduce degradation and planting to link up existing woodland creating a 7km long riverside woodland habitat corridor.

- River Avon Catchment Fish Barrier Easement – Creation of a 'staircase' opening up 9km of additional breeding habitat for salmon.

- Delagyle Backwater Channel Re-watering – Reconnecting and restoring flow in a 200m channel.

- Allt Lorgy River Restoration Project – Restoration of a 600m stretch of artificially canalised river and its floodplain.

- Allt a' Mharcaidh River Restoration – Restoration of a 1.2km stretch of artificially canalised river and its surrounding wet woodland and peatland.

- Aviemore Backwater Reconnection – Reconnecting a 500m side-channel to the River Spey.

8.40 The running costs of the Spey Initiative are funded by NatureScot, Cairngorms National Park Authority and Diageo.

Challenges

8.41 Overall, the current and past projects have seen successes in relation to woodland creation, river restoration, habitat enhancement and floodplain restoration. However, there are several overall challenges within the River Spey Catchment that could impact water quality, natural function of the river and wildlife habitats. There is increased pressure on the River Spey, particularly in relation to using the river to generate hydro power as the demand for renewable energy increases. This can interfere with the natural functioning of the River Spey downstream. This is partly compounded by the pressures on the River Spey. Development, and growing population means more demand for drinking water and more treated sewage going back into the river. This requires new infrastructure and careful management and monitoring to ensure the river is not harmed. Climate change will mean hotter, drier summers and warmer, wetter winters for north-east Scotland. Low flows and peaks in water temperature in drought conditions, as were experienced in summer 2018, pose a potential threat to salmon and trout. In addition, increased intensity and frequency of storms can cause flooding, excessive erosion and damage to the river's ecology.

Chapter 9
Other Delivery Mechanisms – Detailed Case Studies

Introduction

9.1 This chapter of the report sets out four case studies where different delivery mechanisms have been used in more detail. The case studies include:

- Clyde Climate Forest;
- Greater Manchester;
- Forestry and Land Scotland; and
- Cumbria Landscape Partnership.

9.2 The first two case studies have been selected as they have both been developed through partnerships which have enabled them to amalgamate several different funding sources and have involved the delivery of projects at different scales. The third case study was selected to show how private sector funding can be leveraged to deliver large scale projects. The final case study was selected to provide an example of a Landscape Enterprise Network Scheme, one of the new emerging mechanisms to deliver landscape-scale by creating a local network for the delivery of nature-based solutions for ecosystem services.

Case Study 11: Clyde Climate Forest

Overview

9.3 The Glasgow and Clyde Valley Green Network Partnership (GCVGNP) acts as the facilitator for large-scale Green Network initiatives across the Glasgow City Region, in partnership with Scottish Forestry. The Clyde Climate Forest (CCF), launched June 2021, is being delivered as part of the GCVGN across the eight local authorities in the region. It has gained support from the Woodland Trust, the Green Action Trust, TCV Scotland, local authorities, universities and housing associations.

9.4 The CCF aims to plant 18 million trees by 2030, increasing the average tree canopy cover in the Glasgow City Region from 17% to 20%, requiring a doubling of the current rate of woodland creation to achieve this target. It aims to deliver three main elements:

- **'Canopy':** Urban canopy cover.
- **'Connectivity':** Regional woodland habitat network.
- **'Carbon':** New forests on farmland and vacant and derelict land.

9.5 The scheme allows businesses to purchase local carbon credits to help offset residual emissions through their corporate climate change strategy helping to deliver their NetZero targets. They can also contribute as part of Corporate Social Responsibility commitments through sponsorship. They are encouraged to engage staff to participate in corporate tree planting activities as part of the project. Businesses are offered recognition for their support in campaign materials and PR opportunities at the time of planting, in return for their support. For example, McLaughlin & Harvey Construction Ltd. signed off on a new Carbon Strategy with a commitment to Net Zero by 2030. To achieve this, they have been investing in the CCF.

9.6 Individuals and community groups are also able to donate to the CCF.

9.7 The majority of woodland planting will be funded through Scottish Forestry grants and other funding mechanisms (e.g., £400,000 from Woodland Trust Emergency Tree Fund and £150,000 from Scottish Forestry secured). A higher payment rate of grant funding from the Forestry Grant Scheme (FGS) is also available for native woodland projects located within the target areas of the CCF[52].

9.8 It should be noted that all investments in this project are voluntary and no developer obligation mechanisms are currently put towards the delivery of this project.

Projects Funded

9.9 The target is to plant up to 1.5 million new trees with local communities in urban areas, 101 native woodlands to create migratory routes for wildlife, and up to 1,000 hectares per year of new forest across the region. A significant focus is being placed of the benefits to health and

wellbeing of increased planting in this largely urban context, offering opportunities for improved access to greenspace and improved air quality.

9.10 Some projects that are underway include:

- Faifley Knowes Park, Clydebank – Planting of 600 trees creating multiple co-benefits for biodiversity and the local community. This also contributes to an important link in the strategic access network.
- Tiny Forest, Seven Lochs – Planting of dense mix of 600 native trees to form part of Scotland's largest urban nature park.
- Farming Sector, Torrance – Planting across 27ha of unproductive land with FGS support. Enabled co-benefits of diversification for the family business at Hillhead Farm.
- Utility Sector, Scottish Water – Scottish Water has identified sites to support the development of the CCF and is assessing all landholdings for the potential to improve sequestration.
- Public Sector – 40,000 trees are being planted to help Glasgow City Council towards Net Zero in association with the Green Action Trust. This includes the creation of a woodland habitat linking key woodland areas in the region, including Cart and Kittoch Wood Site of Special Scientific Interest.

9.11 The CCF has identified 16 'Target Neighbourhoods' across the City Region with very low urban tree cover and are particularly vulnerable to the impacts of climate change. They are promoting a '1000 Tree' campaign in four target neighbourhoods for 2022/23.

Outcomes and Monitoring

9.12 The CCF monitor progress towards the 18 million trees in 10 years target by collecting information via. the 'CCF Tree Counter' form on their website. As of March 2023, the CCF website reports that 1,154,665 trees have been planted across the region[53].

9.13 The Clyde Climate Ready Glasgow City Region Adaptation Strategy and Action Plan sets out the expected outcomes for the CCF. Planting at scale across the region, improving

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[52] Scottish Forestry (2021) Grants to Fund Connectivity

[53] Clyde Climate Forest website – CCF Tree Counter

connectivity and the expansion of areas that are ecologically resilient will help to manage climate risk through improved natural flood management. Overheating in urban areas will also be reduced through improved shading and transpiration. Connections for biodiversity across the region will benefit and there will be much greater opportunities for recreation, active transport connectivity, and associated health and wellbeing benefits across the region.

9.14 The CCF model has the potential to unlock further funding opportunities, such as for peatland restoration. It also has the potential to inspire climate action, and provide opportunities for education, training and new green jobs.

Challenges

9.15 Woodland planting is a well-established carbon offsetting practice, therefore readily available guidance is available from examples across the UK including the Forestry Commission, the Woodland Carbon Code and Woodland Carbon Guarantee, offering established methods for calculating carbon sequestration from tree planting. The challenge with tree planting for organisations hoping to reach net zero by 2030 due to the time lag associated with establishment of trees and growth needed to reach peak carbon sequestration takes time (around 10 to 30 years)[54]. Carbon sequestration and storage is also dependent on the management of woodlands once trees are established.

9.16 As for the CCF, most tree planting schemes are likely to attract funding for their function beyond carbon sequestration, such as biodiversity and conservation objectives. Therefore, investment for carbon purposes (i.e. 'carbon credits') would need to be scrutinised from an additionality point of view. The Woodland Carbon Code required projects to source at least 15% of lifetime costs from the sale of carbon offsets to be considered 'additional'[55].

9.17 The success of CCF will not only depend on the ability to raise sufficient funding for the project, but also the willingness and cooperation of landowners to plant their land[56].

Case Study 12: Greater Manchester

Overview

9.18 Greater Manchester has set out a pathway to become a carbon neutral in the city region by 2038. Significant action and investment is also required to meet the ambitions set out in Greater Manchester's Five Year Environment Plan.

9.19 The Greater Manchester Joint Development Plan 'Places for Everyone' (2021, p.87) states that *"By following the energy hierarchy, new development will need to achieve net zero carbon through the maximisation of on-site measures first. However, in circumstances where a development has demonstrated that the hierarchy has been followed and there are no reasonable alternatives to meet the minimum carbon reductions, then payment to offset remaining emissions will also be required. Such payments should be expected to fund other carbon saving programmes within Greater Manchester to help meet the 5 Year Environment Plan targets (such as energy efficiency retrofit and renewable energy installations). The Mayor of Greater Manchester is developing an Environment Fund, which will provide a mechanism for carbon offset payments to be made. Districts may also develop alternative approaches within Local Plans"*.

9.20 A detailed evidence base report on carbon offsetting was produced by the Central for Sustainable Energy (CSE) for the Greater Manchester Combined Authority in 2020[57]. It proposed setting a carbon price of £113 or £118 per tonne but questions whether a higher price might be needed to achieve Greater Manchester's target of net zero emissions by 2038.

The Greater Manchester Environment Fund

9.21 The Greater Manchester Environment Fund (GMEF) was created in partnership between The Wildlife Trust for Lancashire, Manchester and North Merseyside and The Greater Manchester Combined Authority. It is an independent charity that aims to bring together public, private and philanthropic funding to tackle environmental challenges in the region. The idea for

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[54] Environment Agency (2021) Achieving net zero – A review of the evidence behind potential carbon offsetting approaches
[55] Environment Agency (2021) Achieving net zero – A review of the evidence behind potential carbon offsetting approaches

[56] Brodies (2021) Glasgow's Greenprint – The Clyde Climate Forest
[57] Centre for Sustainable Energy (2020) Greater Manchester Combined Authority Carbon and Policy Implementation Study – Part 2 – Carbon Offsetting

its inception was about corralling a lot of the funds that sometimes disappear nationally, are not spent as effectively and to bring them all together to make a focused difference.

9.22 It is seeking to develop business models based on income generated by voluntary carbon credits, biodiversity net gain (BNG) credits and private investment in the restoration of landscapes across Greater Manchester. The GMEF is also exploring ways to divert business levies, fines and taxes (such as landfill, aggregate, plastic bags and enforcement undertakings) into the one centralised funding mechanism. For instance, Lancashire Wildlife Trust has received Enforcement Undertakings in the past and have used the funds to invest in conservation and restoration of grasslands, woodlands, peatlands and the North West coast. The GMEF has also created a relationship with Suez, who focus on tackling waste and benefiting communities across the region by funding community initiatives.

9.23 The Natural Capital Investment Fund, financed by DEFRA, has been used by the GMEF to help develop a means of realising Greater Manchester's Local Nature Recovery Strategy by developing a project that will harness private investment. Finance Earth has been commissioned to support the GMEF to establish the verification procedures, carry out further research and test models for levering private investment. The GMEF aims to implement financing models that have been developed to attract carbon and BNG[58] income from development activity. They are also working with verification bodies to find ways to quantify and verify these carbon benefits to meet reporting requirements and therefore attract further private investment.

9.24 The GMEF and Finance Earth are working with local authorities, developers and landowners in Greater Manchester to support ambitions to measurably enhance biodiversity based on BNG policy (i.e., developing a 'Habitat Baking Facility' with 'BNG credits' for sale to developers to compensate for unavoidable impacts from new development). They are also developing a carbon facility to attract private investment in carbon landscapes such as peatlands in order to supply high quality local carbon offsets and attract private investment.

9.25 Market research has found that businesses will be willing to pay a premium for *"charismatic"* ways to carbon capture (e.g., peatland restoration, woodland planting) and so GMEF is going to be offering a range of opportunities for businesses to support these projects. Local carbon markets are attractive for businesses looking to meet their Net Zero commitments and align with consumer demand. Rather than investing in overseas carbon markets, investors will have the opportunity to visit and engage in the local projects, improving a business's corporate responsibility profile and local image[59].

Projects Funded

9.26 The 2020 CSE report[60] provides a summary of recommendations for suitable carbon offset projects including domestic efficiency retrofitting (e.g. via council fuel poverty alleviation initiatives, topping up ECO funding, retrofitting council houses and private rental sector), non-domestic retrofitting (energy efficiency improvements to Council buildings and community buildings), community energy projects (e.g. adapting the Greater Manchester Low Carbon Fund or developing new routes similar to the Urban Community Energy Fund), domestic renewable energy projects (e.g. rooftop solar installation), carbon sequestration through tree planting and peat bog restoration.

9.27 Other projects such as commercial renewable energy, commercial and private-owned retrofitting, heat pump installation, district heating networks, and electrification of local authority fleets are also considered potentially suitable dependent on whether carbon savings can be accurately demonstrated.

9.28 The GMEF aims to build up the market infrastructure for greater investment in Natural Capital through developing a few investable pilot projects. With some capacity building and technical assistance, these could then be replicated across the Greater Manchester City Region. Along with these long-term ambitions for carbon offsetting and habitat banking, the GMEF has worked with eNGO partners to develop more short-term 'shovel ready' projects, with the support from the Green Recovery Challenge Fund. Funds have been allocated via the

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[58] In line with the Environment Bill (2020), BNG offsets should exceed the impact it compensates for by at least 10%.
[59] Greater Manchester Environment Fund (2021) GMEF Webinar Greater Manchester Natural Capital Conference June 2021 – Youtube

[60] Centre for Sustainable Energy (2020) Greater Manchester Combined Authority Carbon and Policy Implementation Study – Part 2 – Carbon Offsetting

Green Recovery Challenge Fund, the Recycle for Greater Manchester Community Fund, and the Green Spaces Fund. Projects supported by these funds have included:

- Dovestone – Peatland restoration of a 4000 hectare site and a partnership site between RSPB and United Utilities where they have been delivering restoration works since 2005. 2500 hectares of the site is blanket bog so there is significant potential for restoration.

- Philips Park – Greenspace improvements including wetlands, woodlands, public access and recreation.

- Rochdale Canal – Working the Canal and River Trust for habitat creation including grasslands, wetland areas, flower-rich meadows and introduction of aquatic species along the canal.

- Wigan Wetlands – Wigan Council and Lancashire Wildlife Trust are improving the environment for people and nature.

- Northern Roots, Oldham – Development of the UK's largest urban farm and eco-park to create jobs, skills and education for local people while improving the biodiversity and environmental value of the site.

- Manchester Mosslands – Working with Lancashire Wildlife Trust to improve lowland raised bog and improving connectivity by re-wetting the site.

9.29 The GMEF has a funding plan to improve the environment including wetland creation and improvement, habitat creation, tree planting and protecting priority habitats to store carbon. Other projects the GMEF aims to fund include nature-based solutions for flood risk mitigation, and diversifying parks and greenspaces.

Outcomes and Monitoring

9.30 The 2020 CSE report recommends that the schemes such as the woodland carbon code and the UK peatland code would provide a basis by which the amount of carbon sequestration can be verified. Projects must be additional to 'business as usual' and they must be monitored

and re-certified, the calculations should be conservative and based on sound evidence, and emissions reductions should be permanent.

9.31 As set out above, the GMEF is investing in developing a financing mechanism by which both 'carbon credits' and 'BNG credits' can be accurately quantified and meet the reporting requirements.

Challenges

9.32 The Greater Manchester Natural Capital Investment Plan[61] proposed significant investment in tree planting. The CSE have previously raised concerns about using carbon offset funding to pay for tree planting because there may be substantial overlap between the requirements to carry out tree planting to achieve carbon sequestration, and the landscaping required as an integral part of a new development (i.e., it may be difficult to rebut arguments of double charging). Additionally, trees are only effective in sequestering carbon if they are left in place to grow. However, CSE acknowledge that with appropriate monitoring and verification (i.e., using the woodland carbon code) these problems could be addressed.

Case Study 13: Forestry and Land Scotland Carbon-offsetting Partnerships

Overview

9.33 Forestry and Land Scotland (FLS), as one of Scotland's largest land managers, can work on a large scale and deliver significant impact when it comes to delivering carbon offsetting projects. The Scottish Government's updated Climate Plan (2020) pledges that woodland cover across the country will be increased from 18 to 21%, and that 40% of Scotland's degraded peatland will be restored by 2032. Given the scale of these targets, it is acknowledged that private investment through the carbon market will be required to meet these targets.

9.34 FLS work with partners to scale-up their ability to deliver carbon capture projects such as tree-plating and degraded peatland restoration. They offer corporate partnerships to businesses and organisations that could help offset their unavoidable carbon emissions (as well as

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contributing to an organisation's corporate social responsibility project portfolio). Before offering corporate partnerships, FLS expected organisations have taken measurable steps to reduce their carbon footprint, prevent any avoidable emissions and reduce any remaining emissions as far as possible.

Projects Funded

9.35 The first corporate partnership was launched in 2019 with a £5 million investment to create new woodland and restore peatland over five years. These carbon credits enable Shell to offer customers an option to offset carbon dioxide emissions from their fuel purchases in the Netherlands and more recently in the UK[62]. The partnership with oil company Shell funded a project to re-establish Caledonian pine forests across hundreds of hectares at Glengarry in the west Highlands. These traditional offsetting schemes, such as tree-planting and peatland restoration provide clear benefits with potential to maximise multiple benefits including both carbon sequestration and biodiversity net gain. Glengarry forest is one of the largest remaining areas of native Caledonian pine that still exists. FLS are working to preserve and extend this native woodland, including a scheme to plant more than 200,000 trees in the first two years of the project.

Figure 9.1: Tree planting

9.36 FLS have identified more than 80 carbon projects across over 5,000 hectares of Scotland. They are advertising opportunities for further corporate partnerships with the aim of bringing about projects that will help restore degraded landscapes and create new habitats for wildlife, create green spaces for people for enjoy, improve local water quality, improve flood and drought resilience, and provide sustainable construction materials. Partners can choose from a range of projects including[63]:

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[62] Shell Global (2019) 2019 Inside Energy Articles – 4. Sowing seeds for the future

[63] Forestry and Land Scotland (2022) Carbon Partnerships – How Forestry and Land Scotland can help deliver land-based carbon projects

- Transforming derelict land – Working to restore soils at several open-cast coal mines in readiness to plant trees, create green space, create new habitats, enhance the landscape and provide a supply of sustainable building materials.

- Planting pockets of native woodland – Particularly trees planted along river banks to create connective corridors of flora and fauna, prevent landslides and reduce flood risk.

- Creating new productive woodlands – Including a variety of broadleaved and coniferous species to create diverse habitats and enhance the landscape.

- Restoring degraded peatland – Bog restoration, drain blocking and gullies to help re-wet soils, re-profiling peat hags and manually spreading donor sphagnum to help re-vegetate damaged areas. Healthy peatlands provide benefits to biodiversity, water quality, and flood, drought and wildfire resilience.

- Working to restore whole landscapes – FLS are Scotland's largest land manager so large-scale projects can include woodland creation, peatland restoration, and other land management activities that are out with current carbon markets.

Outcomes and Monitoring

9.37 Each FLS project will begin with a forecasted future carbon benefit through independent evaluation, quantified as a 'Pending Issuance Unit' (PIU). Each PIU is equivalent to one future tonne of carbon dioxide equivalent captured (by woodlands) or avoided (by peatlands). As the projects progress (the trees grow and the peatland stops eroding), independent verification is carried out to survey and quantify the achieved carbon benefits. At this point, PIUs can be converted into carbon offsets.

9.38 Woodland creation projects are validated to the UK Woodland Carbon Code and peatland projects to the Peatland Code to ensure the verification of carbon credits. These are independent quality assurance standards for the UK and ensure that there will be no double counting of carbon units at UK or international level.

9.39 FLS also advertise the wider benefits of the scheme for corporate partners, outside of carbon offsets such as those which will help organisations meet their Corporate Responsibility

Aims. A report by Eftec[64] into wider project benefits undertaken through the Woodland Carbon Code valued them as:

- £64-£75 per tonne for recreation;

- £9.80 per tonne for air quality (dependent on location – higher in urban areas);

- £22-£97 per tonne for biodiversity; and

- £7.37 of Gross Value Added (GVA) per tonne in economic activity (through jobs in planting and managing the woodlands).

9.40 These offer additional benefits to the carbon offsets delivered through the project and are not independently monitored through a recognised validation scheme.

Challenges

9.41 The initial corporate partnership between FLS and Shell has raised some backlash from environmental groups that consider the carbon offsetting scheme as *"greenwashing"*. Scottish ministers have received criticism for accepting the pledged money from Shell, as one of the biggest fossil fuel companies in the UK. Tree planting projects will sometimes take decades to capture the quantity of emission that the offsetting scheme provides. Critics of this carbon offsetting approach argue that this approach offers a 'get out of jail free' card for companies with a large carbon footprint and will actually slow efforts to reduce carbon emissions in the long run. However, private investment through the carbon market is required to meet Scottish Government pledges to woodland cover and peatland restoration.

9.42 Lorna Slater (Green MSP and Minister responsible for NatureScot and National Parks), with reference to the recent partnership between NatureScot, Hampden & Co., Lombard Odier Investment Managers and Palladium set out that *"The finance gap for nature in Scotland for the next decade has been estimated to be £20 billion. Leveraging responsible private investment, through valuable partnerships like this, will be absolutely vital to meeting our climate targets and restoring our natural environment. Scotland is well placed to take a leading role by offering investors the opportunity to generate sustainable returns from the restoration and regeneration of our landscapes. This investment will generate multiple benefits: ending the loss of*

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[64] Forestry Commission (2016) Assessing the wider benefits of the Woodland Carbon Code

biodiversity, improving water quality, reducing the risk of flooding, regenerating local communities and creating green jobs".

Case Study 14: Cumbria Landscape Enterprise Network (LENS)

Overview

9.43 Nestlé and 3Keel, have developed LENs – an independent mechanism through which businesses with a common interest in protecting the environment work together to protect it. LENs systematically connects groups of buyers of nature-based solutions (usually habitat restoration, or regenerative farming methods) with groups of land managers who can deliver the work on the ground.

9.44 The first LENs project started in 2017 in Cumbria. Cumbria is known for mountains, lakes and rural landscapes, including the Lake District National Park. The LENs project in Cumbria focused on soil and nutrient management with the aim of reducing phosphorus in watercourses. Several organisations rely on the Cumbria's landscape, in particular for food production and tourism. Nestlé and United Utilities co-funded NbS delivered by farmers in the Peterril catchment, coordinated by First Milk. This trade is leading to multiple landscape and business benefits:

- It creates an alternative income source for farmers;

- Contributes to lower levels of phosphorus in water courses managed by United Utilities; and

- Strengthens the resilience of Nestle's dairy supply.

9.45 Cumbria LENs now has a strong network of active stakeholders including Nestlé, United Utilities, First Milk, Eden Rivers Trust, Environment Agency, Eden District Council and the National Trust. The next task is to formalise the LENs trading mechanism through a locally-run governance structure, to better integrate LENs within the Cumbria community, and to facilitate NBS trading on a larger scale.

9.46 The LENs projects have enabled positive environmental action and continue to expand. There are now projects across the UK and within mainland Europe. LENs projects support co-investment and encourage organisations to work together. This could support infrastructure for other sectors such as housing, water utilities and hospitality.

Figure 9.2: Cumbria LENs Project[65]

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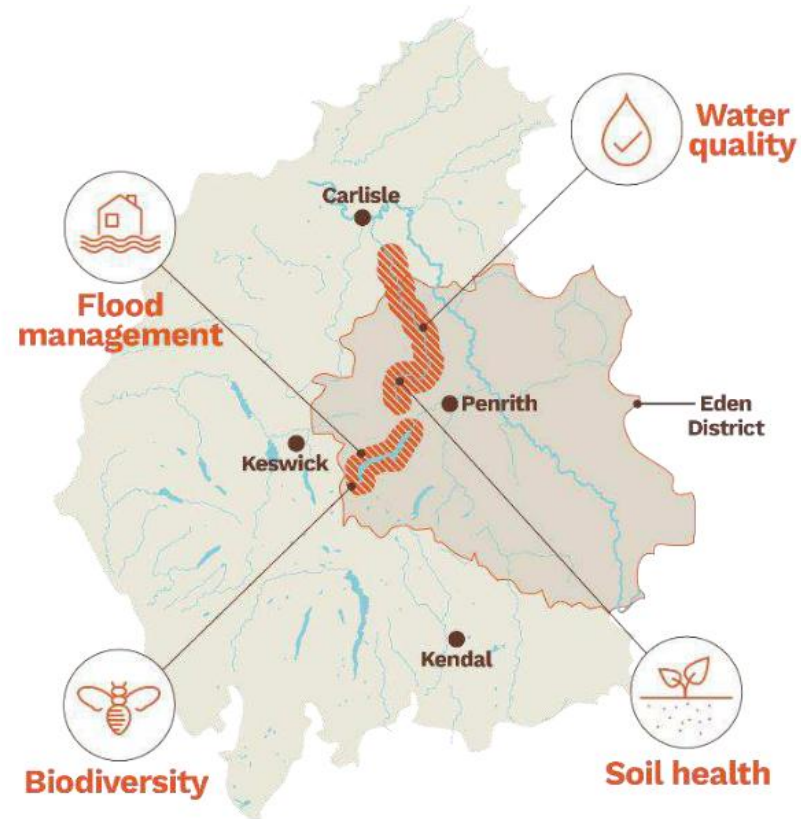
[65] Landscape Enterprise Networks (LENs) website – Cumbria reproduced with permission from 3keel.

Page 296

Outcomes

9.47 Some of the key benefits from the Cumbria LENs are:

- Enhancements to local biodiversity and wildlife habitats;

- Improvements to the health of soils;

- Improvements to local water quality; and

- Better flood risk management.

9.48 These benefits from the Cumbria LENs will support businesses within Cumbria that provide employment and also have a positive effect on local residents and local farmers. These benefits are not mutually exclusive in that improving the health of soils and preventing soil erosion will help protect water quality. Cumbrian businesses and communities have been severely impacted by recent flood events - such as storms Eva and Desmond in December 2015. United Utilities incurred costs of £13.8 million in 2015 and £19.5 million in 2016 due to flooding, including the inundation of a key pumping station in Keswick. It is believed that much of the flooding is associated with the main river and therefore, the creation of flood defenses will have a positive effect of reducing the damage to businesses and houses as a result of flooding. In the landscapes around Ullswater, natural habitats on the fells and by the rivers underpin a range of commercially important functions, Therefore, protecting the natural environment around Ullswater and protecting its water quality will support key industries and local businesses to continue running. It could also reduce the cost to local authorities by lowering the damage risks from storms.

9.49 The work so far sets out the possibilities and has engaged a set of potential players in a LENs network. The plan now is to build on the interest created in the development phases of LENs to start to build a LENs business network in Cumbria.

Challenges

9.50 One of the key challenges with LENs is that it relies on partnership across a variety of industries and organisations. This could impact on funding for nature based solutions if partnerships can't be established or the organisations involved are not in a position to fund nature-based projects. There is also a risk of how much community engagement will occur given that the partnership includes several large organisations and national agencies.

9.51 Significant flood events have occurred in Cumbria in recent years, particularly in Carlisle and Keswick. Climate change is expected to increase the frequency and severity of flood events. Therefore, providing flood mitigation through LENs could be costly and require regular maintenance to ensure the defences remain functionable.

Chapter 10
Grant Funding Sources

10.1 A detailed assessment of all current grant sources available to Moray Council and its private, third and community sector partners for investment in natural capital assets and other associated investments is available in **Appendix A**. This is presented as a table and provides a description of each fund and details on eligibility, assessment criteria, timescales and the amount of funding available. Each fund has been matched to the potential investment opportunities identified in **Chapters 2 and 3**. Details of a total of 23 funds are provided. It should be noted that grant funds are subject to change, both in the grants available and their assessment criteria. Therefore, it is important that a regular review of funding sources is undertaken.

Chapter 11
Recommendations and Next Steps

Overview

11.1 This report has outlined potential natural capital investments which could be made in Moray to achieve carbon-offsetting and nature restoration benefits and deliver other ecosystem services. It has also provided a summary of potential supporting investments which would maximise the benefits from the investment in natural capital assets.

11.2 The delivery of such investments on a landscape scale will be essential to achieving carbon offsetting and nature recovery targets. However, their successful delivery relies on various considerations of delivery and funding mechanisms and an appropriately skilled workforce to implement them.

11.3 This report has provided a summary of several funding and delivery mechanisms for these types of investment, supplemented with a series of case studies outlining the relative benefits and challenges associated with each in practice.

11.4 This chapter draws together the recommended approach for Moray to deliver landscape scale carbon offsetting, both through the planning system and through an area wide partnership.

Recommended Approach to Implementation through the Planning System

11.5 The recommended way to deliver the enhancement opportunities identified in this Report through the planning process is in the form of financial contributions linked to a local policy requirement and/or a supplementary guidance document. Financial contributions should be sought as a last resort whereby a developer has evidenced they cannot achieve net zero on-site. The contributions should be accounted for in the purchase price of the land however, where viability is an issue then the viability process set out in the Council's Developer Obligations Supplementary Guidance is to be adhered to.

11.6 It is suggested that the most appropriate way of framing the requirement for financial contributions for carbon offsetting is through a local policy in the new MLDP 2027 and in the interim, a planning guidance document which supports the developer through the process, for example by detailing the enhancement measures identified in this Report or through other measures the Council may deem appropriate.

11.7 Some key considerations relevant to framing any future supplementary guidance include:

- Linking or phasing requirements to the scale and nature of the development through the 'hierarchy of development';

- Identifying appropriate net zero targets and biodiversity benefits which would frame the requirement, as discussed throughout the Case Studies in this Report (e.g. percentage improvement of Building Regulation Standards) or any other appropriate measure(s) identified by the Council;

- Considering the mitigation hierarchy and ensuring offsetting is only pursued where it is demonstrated that the necessary emissions reductions or biodiversity enhancements cannot be achieved on site; and

- Unless another appropriate alternative delivery mechanism can be put in place by the Council, consideration of a zoning approach, whereby a commuted sum may only be required where development is within a certain zone, or within a certain proximity to an identified enhancement opportunity.

11.8 In summary, it is considered that provided that any future guidance is robust enough in setting out the methodology for off-setting contributions, this would provide a competent approach to implementation, meeting the associated legal test while providing sufficient flexibility for the Council to work in partnership with the development industry to achieve natural capital objectives and implement key provisions of NPF4.

Recommended Approach for Landscape Scale Implementation

11.9 It is unlikely that any developer contributions would be sufficient to achieve natural capital investment at the scale identified in **Chapters 2 and 3** and a range of funding mechanisms will be required.

11.10 Highland Carbon, and Forestry and Land Scotland's carbon off-setting partnerships have used one main private finance mechanism to deliver projects. While this reduced complexity in delivery, it led to criticism of the projects, relating to a lack of consideration of benefits for local communities and accusations of 'greenwashing' from environmental groups in the case of Shell's investment in forestry at Glen Garry.

11.11 Other case studies which used only one mechanism e.g., Ashill Habitat Bank or TreesAI were focussed on specific outcomes in a localised area and are therefore would not deliver the full range of potential investments identified in Moray. Case studies with characteristics which are most relevant to achieving natural capital investment in Moray include those delivering a variety of outcomes at a larger scale such as the Clyde Climate Forest and the Greater Manchester Environment Fund.

11.12 These partnership models have enabled the amalgamation of several different funding streams, maximising the outcomes from projects they have funded. This has ensured a pragmatic and streamlined approach to meeting a common goal for natural capital investment across a wider area. While the geography of Moray is different to both the Clyde Region and Greater Manchester, being a more rural and disparate area, this approach is still appropriate. It maximises outcomes as it allows various funding mechanisms and projects to be incorporated.

Recommendation

LUC recommends that Moray Council establish a partnership to take the natural capital investment opportunities forward. A partnership model would also allow the delivery of projects at a range of scales, including projects which could be fully community led to maximise community buy in to the overall programme of investments.

11.13 The development of the partnership should involve coordination with existing initiatives already being explored in Moray such as the Findhorn Watershed Initiative and the Spey Catchment Initiative who have developed their own partnerships and are exploring a range of delivery mechanisms including LENS.

11.14 A partnership approach was previously set up for the National Lottery Heritage Funded Tomintoul and Glenlivet Landscape Partnership in the Moray Council area, many of the same partners are likely to be involved in this future project and bringing this experience. The main

challenge for the partnership is likely to be gaining the support and participation of private landowners which will be critical for the delivery of many of the identified investments.

Funding

11.15 Under the partnership model described above, funding mechanisms appropriate for implementation in Moray include:

- Grant funding;

- Developer contributions;

- Potential offsite biodiversity net gain credits (Scottish equivalent metric as this is developed); and

- Private investment through payments for ecosystem services, including carbon markets.

11.16 As individual investment opportunities are developed, specific funding mechanisms appropriate to these can be identified. At this stage it is important that the partnership explores the full range of potential funding mechanisms and retains the ability to stack these where appropriate and feasible to maximise investment.

Next Steps

11.17 The next steps that Moray Council should take to progress the natural capital investment opportunities identified can be split into 5 stages, with multiple actions within each stage.

Figure 11.1: Steps to progress the natural capital investment opportunities

Stage 1: Stakeholder and Landowner Engagement

11.18 Before the individual opportunities are developed further, it will be important to engage with key stakeholders to gain their support for the opportunities identified and to identify any potential constraints. Crucial stakeholders for which early engagement will be necessary include the Cairngorms National Park Authority, SEPA, other statutory bodies and relevant Moray Council departments including the flood team.

11.19 It will also be important to engage with landowners and tenants at an early stage, particularly farmers where agricultural land enhancements are proposed.

Stage 2: Source Development Funding

11.20 Development funding should be sourced to cover the costs of a development officer post to coordinate the initial stages of the project and professional fees for options development. Moray Council may wish to consider funding this position themselves and funds such as FIRNS and the Nature Restoration fund can be approached for additional funding for project development work.

11.21 The development officer role should manage all subsequent stages.

Stage 3: Identify Governance Model and Establish the Partnership

11.22 Further work is required to assess the governance model for the partnership and a full review of options should be carried out, which could include the creation of a separate governance body/charity as for the Greater Manchester Environment Fund. The next steps are then to: identify and engage with potential stakeholders to secure their representation in the partnership (e.g., statutory agencies and landowners).

11.23 Regional Land Use Partnership Pilots are currently underway in Scotland[66], including in the Cairngorms National Park and this may become a suitable governance structure for the delivery of many of the identified opportunities dependent on the outcomes of the pilots.

11.24 Establish the partnership and governance structures.

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[66] Scottish Government (2021) Land use – getting the best from our land: strategy 2021 to 2026

Stage 4: Project Development and Prioritisation

11.25 In order to identify projects the following steps should be taken:

- Prioritise natural capital investment opportunities through stakeholder engagement including community, stakeholder engagement and landowner engagement, and an assessment of socio-economic data in order to identify areas where greatest community benefit can be achieved;

- Carry out a detailed feasibility assessment of initial priority natural capital investment projects;

- Identify and co-ordinate further detailed work and assessments required to further progress opportunities towards the delivery stage; and

- Make connections with staff responsible for Clyde Climate Forest and Greater Manchester Environment Fund to share learning.

Stage 5: Develop Potential Delivery and Funding Mechanisms

11.26 The final stage of this early development is to assess options to match potential funding mechanisms with prioritised investment opportunities to enable the Council to progress to detailed assessment and delivery of the options.

Appendix A

Grant Funding Sources

Table A.1: Funding opportunities for natural capital investment

Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
NatureScot/Scottish Government/National Lottery Heritage Fund	**FIRNS – The Facility for Investment ready Nature in Scotland** Grant scheme to support projects that shape and grow the use of private investment and market-based mechanisms to finance the restoration of Scotland's nature. Projects must be able to develop a viable business case and financial model to attract investment in projects that can restore and improve the natural environment. https://www.nature.scot/funding-and-projects/firns-facility-investment-ready-nature-scotland	Offered to range of organisations and partnerships: ■ Charities/trusts/community groups; ■ Public bodies including local authorities/central govt. agencies; ■ Private individuals/companies, academic institutions; and ■ Community interest companies.	Must be able to develop a viable business case and financial model to attract investment in projects that can restore and improve the natural environment. Supported projects will: ■ Support the restoration of nature and growth of natural capital backed by robust science-based methodologies; ■ Enable or generate revenue and /or cost savings from ecosystem services in order to attract and repay private sector investment; ■ Explore and demonstrate engagement with community interests in project design, and activities, supporting a just transition; and ■ Develop effective mechanisms to share benefits with communities, supporting a just transition.	Deadline for expression of interest: 17th April 2023. Application window closed: mid-June 2023. Announcement of winning bids: mid-August 2023.	Development phase projects (max. duration 6 months): £100,000. Market and investment readiness projects (approx. 21 months): Up to £240,000.	All.
Scottish Government/ NatureScot	**Peatland ACTION Fund** National programme to restore peatlands across Scotland. Led/funded by Scottish Government in partnership with NatureScot and supporting agents. Fund primarily supports on-the-ground peatland restoration activities. Where appropriate, multi-year offers for large-scale projects will be made. https://www.nature.scot/climate-change/nature-based-solutions/peatland-action-project	All eligible land managers who have peatlands that would benefit from restoration. There are no geographical restrictions or target areas.	■ Majority of peatland in project area must have peat depth over 50cm, but down to 30cm will be considered if they form an intrinsic component of the peat hydrological unit. ■ Generally expect projects >10ha with cost over £10,000.	Rolling programme – applications can be submitted at any time of year (recommend 12 weeks before intended start date). Also offer multi-year offers for larger projects.	Total fund £250 million up to 2030. Range not specified for individual projects.	Peatland restoration.
	Nature Restoration Fund (NRF) Specifically encourages applicants with projects that restore wildlife and habitats on land and sea and address the twin crises of biodiversity loss and climate change. The NRF is a commitment in the current Programme for Government for multi-year funding as part of overall investment in the natural economy. The £65 million fund, a key part of the Bute House Agreement and multi-year funding across this parliament was announced on Nature Day at COP26. Details for The Edinburgh Process Fund, for Local Authorities, National Park Authorities, and their partners engaged in delivering local nature networks and other biodiversity projects locally will be announced later in 2023. https://www.nature.scot/funding-and-projects/scottish-government-nature-restoration-fund-nrf	Suitable for: ■ Constituted organisations (registered charities and trusts/community groups); ■ Private individuals and companies; and ■ Partnerships and organisations working collaboratively with others. Public Bodies cannot be the principal beneficiary of a grant from NRF but can be a coordinator of, or funding contributor to, a wider partnership bid (where the match funding eligibility criteria are met). Any bids with public body partners will be scrutinised to ensure funding is delivering activities that would not be expected to be undertaken by public bodies as part of their core functions, or as would be expected in delivering their biodiversity duties.	Priority will be given to projects which: ■ Bring together strong partnerships; ■ Leverage funding in excess of the NRF minimum requirement from other financial partners; ■ Demonstrate clear additionality to existing and already committed actions; and ■ Have a sustainable vision and a clear exit strategy which does not require further NRF funding. All project proposals should reference how the project will contribute to climate change mitigation and adaptation.	Expressions of interest recently closed for projects under 'Helping Nature' funding steam (£25,000-£250,000). To be delivered over max 2 years. The Transforming Nature strand of the NRF (which offers grants of over £250,000 and development phase funding) is expected to open again later this year.	Helping Nature £25,000-£250,000. Transforming Nature £250,000+.	All.

| Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
National Lottery Community Fund	**Climate Action Fund – Nature and Climate** Looking for projects that focus on the link between nature and climate. The Climate Action Fund will fund projects that use nature to encourage more community-led climate action. These projects should bring other important social and economic benefits. Like the creation of strong, resilient and healthy communities or the development of 'green' skills and jobs.	Accept offers from: ■ Local partnerships; and ■ UK-wide partnerships which are delivered across at least two UK countries.	Projects should do at least one of the following: ■ Show how creating a deeper connection with nature will lead to changing people's behaviours and greater care for the environment; and ■ Show how by bringing nature back into the places we live and work, we can help communities to reduce or adapt to the impacts of climate change.	Ongoing.	Up to £1.5million over 2-5 years. Most projects between £300,000 and £500,000.	All.
Transport Scotland	**Network Support Grant** The Network Support Grant is a discretionary grant that subsidises commercial and community bus routes. It aims to keep fares at affordable levels and networks more extensive than would otherwise be the case.	Commercial bus operators and community transport organisations. See the Transport Scotland website for full details on eligibility.	https://www.transport.gov.scot/public-transport/buses/network-support-grant/	Community transport organisations possessing a section 19 or section 22 permit can either claim once annually, or twice yearly in arrears for set 6-month periods (1 October – 31 March and 1 April – 30 September).	Information not available.	Supporting investment – Access.
Scottish Marine Environmental Enhancement Fund (SMEEF)	**Restoration, Recovery or Enhancement (RRE) Grants** Examples of restoration, recovery or enhancement could include: ■ Habitat improvements, for example, relating to sand dunes, seagrass, saltmarsh and native oyster beds. ■ Measures to restore, recover or enhance mobile species for example relating to marine birds or cetaceans. ■ Invasive species eradication. ■ Other activities, including citizen science, which help to improve our understanding of human pressures on the marine environment, particularly if they are part of a practical restoration project. https://smeef.scot/grants/	The applicant(s) must be based in the UK and all projects must be delivered in Scotland. The main applicant cannot be a for-profit company, however they can make up a minority interest of a consortium bid.	Projects should always: ■ Be as collaborative as possible and have a clear engagement plan for involving interested groups; ■ Demonstrate clear additionality to existing and already committed actions; and ■ Be informed by science; driven by knowledge and backed up by monitoring. All applications for marine and coastal restoration are welcome. As a broad guide we consider 'marine and coastal' to include species and habitats where salt water plays a crucial role in the natural life cycle. The project can include financial returns or cost recovery through financial mechanism, but the main aim of the project must be biodiversity/ecosystem gains, not profit.	Currently closed for RRE applications.	£10,000-£25,000. One exceptional award of up to £100,000.	Coastal flood management.
Scottish Government/ Scottish Forestry	**The Forestry Grant Scheme** Financial support for both the creation of new woodland and the sustainable management of existing woodland (planting, woodland protection, harvesting etc.). Capital payments and annual management payments available. https://forestry.gov.scot/support-regulations/forestry-grants	Must register with Rural Payments and Services and have a Business Reference Number (BRN). This funding is available for farmers, crofters, foresters, land managers and rural communities.	■ Woodland creation applications must fit well with the local authority woodland strategy (or equivalent). ■ Must meet Scottish Forestry woodland creation aims / scoring criteria. ■ Woodland Improvements grants can go towards creating long term plans (e.g. long-term forest plans), for capital work to protect habitats/species, restructuring regeneration (i.e. restocking/improving diversity), low impact silvicultural systems (LISS) or woodlands in and around towns (WIAT).	Varying timescales for delivery of varying projects following funding (1-3 years). https://www.ruralpayments.org/topics/all-schemes/forestry-grant-scheme/forestry-grant-scheme-full-guidance-menu/forestry-grant-scheme---claims-and-payments/	Woodland Management – funding varies depending on operation. Rates available here. Includes grant and annual maintenance payments. Woodland creation – funding varies depending on density/woodland types. Rates available here. Includes initial planting payment, annual maintenance payments and capital grant for fencing/tree protection.	Woodland creation/restoration.

Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
	Small Woodland Loan Scheme (SWLS) Allows you to carry out work required to create new, small woodland before you get financial support from the Forestry Grant Scheme (see above).	Only available for new applications to Forestry Grant Scheme (see above).	■ Must meet Scottish Forestry woodland creation aims / scoring criteria. ■ Woodland applications no greater than 50ha.	As above.	50% of the capital items in approved Forestry Grant Scheme contract to a maximum of £40,000.	Woodland creation/restoration.
	Community Fund Supports groups and organisations that encourage people to use woods more. Funding can support activities on Scotland's national forests and land.	Suitable for: ■ Voluntary; ■ Community organisations; ■ Social enterprises; ■ Community councils; and ■ Public sector organisations. Minimum requirement is that the applicant has a bank account, and for community groups, a basic constitution.	Eligible: ■ School care clubs and play schemes; ■ Schemes that promote physical activity such as walking, safe routes to school, natural play and adventure play; ■ Developing materials that promote the health and well-being benefits of using woodlands; ■ Facilitation of volunteering for skills training, health improvement and community development; ■ Establishment of volunteer groups and the induction of volunteers; ■ Providing resources to involve communities in the decision making process of managing their local woodland; ■ Costs related to developing Community Asset Transfer Scheme applications from community bodies such as valuation - funding will not normally cover legal fees; and ■ Projects that support the Queen's Green Canopy initiative. Not eligible: ■ Land based and infrastructure spending that can be supported by the Scotland Rural Development Programme; ■ Formal education including forest schools, forest kindergarten and staff continued personal development; ■ Funding staff who work for public sector organisations such as local authorities; and ■ Capital funding for the acquisition of fixed assets such as land and buildings, or mobile assets for public sector organisations.	Not know – Application forms available from local Conservancy office (Highlands and Islands Conservancy).	Up to 100% for projects with a total cost of up to £1,000. Up to 90% for projects with a total cost of between £1,001 to £5,000. Up to 75% for projects with a total cost exceeding £5,000.	Woodland creation/restoration.
Scottish Government	**Agri-Environnent Climate Scheme (AECS)** The Agri-Environment Climate Scheme (AECS) promotes land management practices which protect and enhance Scotland's magnificent natural heritage, improve water quality, manage flood risk and mitigate and adapt to climate change. It also helps to improve public access and preserve historic sites.	The scheme is open to farmers, groups of farmers and other land managers with land in Scotland, who are registered with Scottish Government and have a Business Reference Number.	https://www.ruralpayments.org/publicsite/futures/topics/all-schemes/agri-environment-climate-scheme/	Improving public access suspended for 2023. Agri-environment: Open 30th January – 7th June 2023	Annual management payments/payments for capital cost available. Varied: more information available here.	Agricultural.

Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
National Lottery Community Fund/ Highlands and Islands Enterprise	**Scottish Land Fund** Supporting urban and rural communities to become more resilient and sustainable through ownership and management of land and assets. https://www.tnlcommunityfund.org.uk/funding/programmes/scottish-land-fund	Suitable for: ■ Voluntary; ■ Community organisations; ■ Social enterprises; ■ Community councils; and ■ Public sector organisation.	Open to organisations in both rural/urban areas which are community-led, community-controlled and defined by a geographic area. Must be able to demonstrate project will help local community to: ■ Achieve more sustainable economic, environmental and/or social development through ownership of land and buildings; ■ Have a stronger role in and control over their own development; and ■ Own well managed, financially sustainable land and buildings.	Rolling.	Stage 1: Technical assistance funding £2,500-£30,000. Stage 2: Asset acquisition £5,000-£1million.	All.
Crown Estate Scotland	**Sustainable Communities Fund** Supports local regeneration and sustainable development. Two types of funding available: ■ Community capacity grants; and ■ Environment grants. https://www.crownestatescotland.com/our-projects/sustainable-communities-fund	Community capacity grants – open to all communities up to five miles from Scotland's coastline or within five miles of Crown Estate's rural estates. Environment grants – provide funding to Crown Estate Scotland tenants only.	Community capacity grants – projects that contribute to local regeneration and sustainable development, and, ultimately, help create great places to live, work and visit. Projects that will create self-sustaining community enterprises that will promote sustainable development through the provision of local economic, social, and/or environmental benefits. Environment grants – Can deliver climate change/ natural climate solutions e.g. native tree planting, green travel initiatives, increase local biodiversity, environmental education, circular economy.	Unclear when 2023 applications will be open. 2022/23 deadline was in October 2022 for monies awarded March 2023. Environmental grants – must be able to deliver demonstrable environmental benefits within 18 months of award of funds.	Based on 2022/23 round: ■ £20,000-£50,000 for community capacity grants; and ■ £5,000-£20,000 for environment grants.	All.
Sustrans	**National Cycle Network improvements and signage** To deliver physical improvements to the National Cycle Network.	Available for: ■ Local authorities; ■ Constituted community group; and ■ Public/third sector organisations.	Email scotland@sustrans.org.uk to find out more.	Information not available.	Information not available.	Supporting investments – Access.
	Strategic Partnerships Sustrans Officers to support active travel infrastructure development. The strategic partnerships team will share knowledge and expertise on how to develop active travel projects and guide strategies.	Available for: ■ Local authorities; ■ Constituted community group; and ■ Public/third sector organisations.	Email lee.muir@sustrans.org.uk to find out more.	Information not available.	Information not available.	Supporting investments – Access.
	ArtRoots Fund The ArtRoots fund is a community fund for artistic and aesthetic improvements to the National Cycle Network in Scotland. It aims to encourage communities to participate in shaping their local environment and increase their levels of physical activity. Previous ArtRoots-supported projects include: temporary installations, one-off performances, sculptures, heritage signs, information boards, murals, seating.	Available for constituted community groups based in Scotland.	All groups submitting an application must evidence how they plan to work with the local community to develop the project.	ArtRoots is open for new applications throughout the year. Total annual funding is limited, so prospective applicants are encouraged to apply as soon as possible.	£2,500-£5,000.	Supporting investments – Access and tourism.
Sport Scotland	**Sports Facilities Fund** The fund supports capital projects that create or improve places that people take part in sport and physical activity. Awards are available for sports	Open to any non-profit distributing, constituted organisation whose membership is open to all sections of	In clubs and communities they will support: ■ New, upgraded or extended sports facilities; Inclusive changing facilities;	Small projects have a deadline of 1 April and 1 September for a decision within three months of the deadline.	Single stage process: Up to £250,000.	Supporting investments – Recreation and tourism.

Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
	facility projects within club and communities, school & education or performance sport environments. https://sportscotland.org.uk/about-us/	society. This includes schools and public bodies such as local authorities.	■ Facilities that provide or improve access for outdoor sport and adventure activities; ■ Floodlights that increase capacity at appropriate sports facilities; and ■ Major items of sports equipment. They will provide enhanced support to projects within or serving the most deprived communities, according to the Scottish Index of Multiple Deprivation (SIMD). They focus participation and progression and prioritise projects where there is a commitment to equalities and inclusion, people development, collaboration and impact.	Stage 1 large projects should be submitted by the 1 of any month and Stage 2 by 1 April and 1 September for a decision within three months of the deadline.	Two stage process: £250,000+.	
National Lottery Heritage Fund	**National Lottery Heritage Fund** National Lottery Grants for Heritage allows us to fund projects that connect people and communities to the national, regional and local heritage of the UK. Funds can be used for engagement activities, repairs and conservation, digital outputs, new staff posts, paid training placements, and professional fees. https://www.heritagefund.org.uk/funding/what-we-fund	Any not-for-profit organisation (including community groups/charities/ trusts/local authorities/other public sector organisations).	Don't define heritage – fund projects from historic buildings, industrial legacy and the natural environment to collections, stories and more. Heritage projects could include: ■ Nature (work to improve habitats and conserve species as well as helping people to connect to nature in their daily lives); ■ Designed landscapes (improving and conserving historic landscapes such as public parks, historic gardens and botanical gardens); and ■ Landscapes and the countryside large-scale rural projects that help improve landscapes for people and nature by, for example, restoring habitats and celebrating the cultural traditions of the land.	Under £250,000 – open all year round (assessed within 8 weeks). £250,000-£5m – quarterly application deadlines (25 May/ 17 August/16 Nov 2023/22 Feb 2024).	Funded at three levels: ■ £3,000 to £10,000; ■ £10,000 to £250,000; and ■ £250,000 to £5million.	All, including supporting investments – Recreation and tourism.
Paths for All	**Smarter Choices, Smarter Places Open Fund** To change people's everyday travel behaviour by encouraging more people to walk, wheel or cycle for everyday short journeys, or access public transport for longer journeys. https://www.pathsforall.org.uk/community-paths/cmp-grants	Available to public, third and community sector organisations.	Community path groups can apply to the fund for: ■ Consulting with communities on path improvements; ■ Mapping local walking and cycling routes; ■ Producing local maps showing walking and cycling routes; ■ Providing signage for pedestrian and cycle friendly routes*; and ■ Making walking and cycling routes more attractive and accessible*. * These activities would have to be part of a wider package of behaviour change.	Ongoing with no deadline date.	£5,000 to £100,000.	Supporting investments – Access.
Highlands and Islands Environment Foundation	**Highlands and Islands Environment Foundation Grants** Our goal is to protect and restore the natural beauty, biodiversity & eco-systems of the Scottish highlands and islands for the benefit of all by working in partnership with local communities to implement sustainable and regenerative projects. https://hief.scot/grants/	Local non-profit organisations, associations, clubs or unions, social cooperative enterprises and/or other local bodies, including research centres. They can support projects throughout the Scottish highlands and islands.	Supports projects in the Scottish highlands and islands which fit into one of the Foundation's areas of interest: ■ Montane; ■ Fresh water; ■ Marine and coastal; and ■ Forest and woodland. Your project should create measurable and sustainable long-term results, build capacity and encourage participation by the local society.	Applications will be accepted in three periods in 2023. Upcoming deadlines are 9am on: ■ 15 May 2023; and ■ 18 September 2023.	Previous projects generally £5,000-£15,000.	All.

Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
ScotWays	**Small Grant Scheme** The scheme will award grants to enable a community-based and access-related project which might otherwise not proceed. Projects should fit with ScotWays aims which are the preservation, defence, restoration and acquisition, for the public benefit, of public rights of access in Scotland, including public rights of way and related amenity.	Applicant organisations should be members of ScotWays.	The project meets ScotWays' charitable objective 'The preservation, defence, restoration and acquisition, for the public benefit, of public rights of access in Scotland, including public rights of way, and related amenity'. In the past, the Society has been involved in route maintenance, mapping, signing and producing leaflets to make information about routes available to the public. ■ The application should demonstrate a public benefit to the project; ■ ScotWays will fund up to 50% of the total project cost (excluding volunteer time); ■ The project should not have started before the grant is approved; ■ ScotWays will consider giving staff time in lieu of a cash contribution where that best serves the interests of ScotWays and the project; and ■ ScotWays' contribution to or involvement with the project should be fully acknowledged in all published materials and on signs and structures erected as part of the project, where appropriate.	Application deadlines: ■ 31 May (for decisions mid to end July); ■ 31 August (for decisions mid to end October); ■ 31 December (for decisions mid to end February); and ■ 28 February (for decisions mid to end April).	£500-£1,500 (for up to 50% of the total budget for the project, excluding volunteer time).	Supporting investments – Access.
SEPA via approved bodies: ■ LandTrust ■ EB Scotland ■ The Levenseat Trust ■ SUEZ Communities Trust ■ Grantscape ■ FCC Communities Foundation ltd. ■ Valencia Communities Fund	**Scottish Landfill Communities Fund (SLCF)** This is a Government initiative which was introduced to reduce the impact of landfill sites on neighbouring communities by funding local environmental projects. The aim of the scheme is to enable landfill operators to support various types of environmental projects by donating a percentage of their landfill tax liability. The SLCF are distributed by approved bodies who receive funds from landfill operators. Other organisations involved in the fund are SEPA, Revenue Scotland, the Scottish government, landfill operators, approved bodies and recipient projects. The grant funding can be allocated to carry out a specific project that meets the criteria of the SCLF and projects will be operated on a not-for-profit basis.	Charities and not for profit organisations. Project eligibility quiz: https://scottishepa.typeform.com/to/YjmHzb?typeform-source=www.sepa.org.uk	Projects must conform to one of the following SCLF criteria, fulfilling one of the six objectives given in Regulation 29(5) of the Scottish Landfill Tax (Administration) Regulations 2015: ■ Object A: The reclamation, remediation, restoration or other operation on land to facilitate economic, social or environmental use. ■ Object B: Community based recycling, re-use and waste prevention projects. ■ Object C: To provide, maintain or improve a public park or other public amenity. ■ Object D: The conservation or promotion of biological diversity through the provision, conservation, restoration or enhancement of a natural habitat or the maintenance or recovery of a species in its natural habitat. ■ Object E: The maintenance, repair or restoration of a building, other structure or a site of archaeological interest which is a place of religious worship, or a site of historic or architectural or archaeological interest and is open to the public. ■ Object F: The provision of financial, administration and other similar services to projects. Approved bodies will receive contributions from the landfill operators and consider applications for funding. Each Approved Body has its own application process and will enrol projects that are to be awarded funding. Projects will have to comply with the specific requirements of the Approved Body funding them (see individual project funding websites) e.g. reporting on the project progress	Generally ongoing with no deadline date.	Landtrust: There is no limit to the amount of funding which a project can receive. The funding awarded depends on the quality of the project and support available for appropriate contribution (Recent examples range from £5,000 to £700,000+). EB Scotland: Previous projects typically range £1,000-£100,000+. FCC communities foundation: £2,000-£100,000. Grantscape/SUEZ Communities Trust: Small projects £3,000-£20,000. No overall cost more than £40,000 and must start within 3 months. Primary fund £3,000-£50,000. No overall cost of £250,000+ and must start within 6 months. Valencia: Up to £25,000.	All including supporting investments.

Funder	Fund Description and Eligible Projects	Eligible Applicants	Criteria	Timescales	Funding Amount/Range per Project	Moray Natural Capital Investment Opportunity (tbc)
			and money spent. However, the overarching SLCF criteria is applicable for all Approved Bodies.			
HDH Wills	**HDH Wills – Large Grants** Large grants are made by the Trust in a fixed seven-year cycle. In 2023/24 external applications will be accepted for wildlife and environmental causes. The focus of their support is the conservation and maintenance for the benefit of the public of the natural environment and its indigenous woodland flora and fauna, with particular reference to the conservation and maintenance of the character and amenity of rural areas. https://hdhwills.org/grants/	Charities/organisations supporting wildlife and the environment.	https://hdhwills.org/grants/	Accepting applications from January 2023 – December 2024.	£5,000-£50,000.	All.
Esmée Fairbairn Foundation	**Esmee Fairbairn Foundation** The aims of the organisation include improving the natural world, securing a fair future and strengthen bonds in communities in the UK. They offer grant funding for charitable work. They offer social investment including to organisations working on nature-based solutions towards: preserved species health and habitats (e.g. peat, spaces for nature, prioritising community ownership models where possible), sustainable and ethical food (nature friendly farming), and clean and healthy freshwater. https://esmeefairbairn.org.uk/our-support/social-investment/our-natural-world/	All grants provided by the Foundation must be used solely for charitable purposes. Social investment in organisations that have charitable aims and mission. Also support more commercially based activities where it is clear that the organisation's primary purpose is social impact.	■ Projects that align with the Foundation's aims (wide variety) – under broad headings of Our Natural World, A Fairer Future, and Creative, Confident Communities. ■ Provide a breakdown of outcomes and indicators.	Rolling.	Grants: Varied – depend on nature of the project/organisation. Social investment: £100,000-£2 million (average £437k).	All.
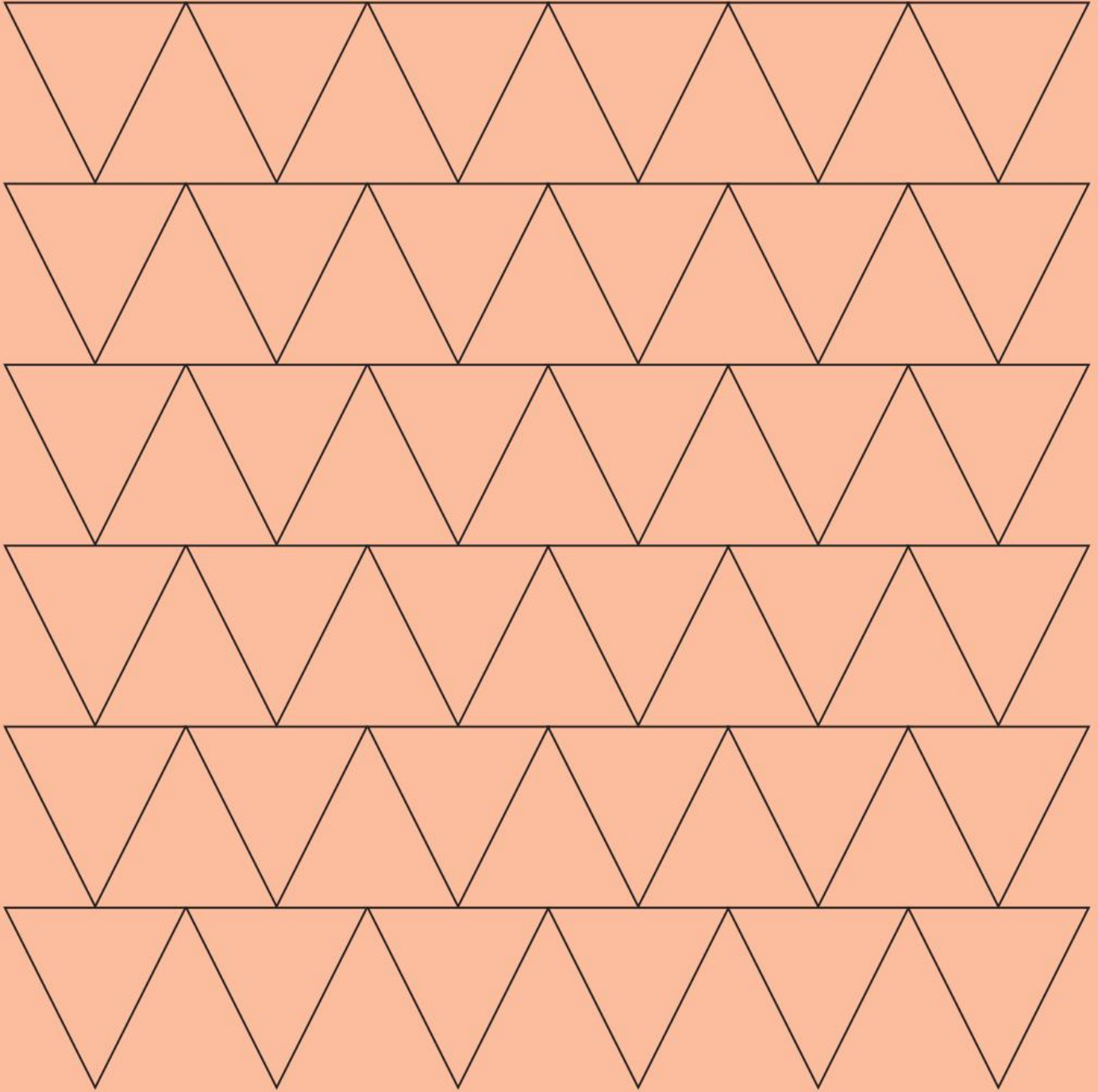
Harnessing nature's capital

The Role of Green Walls and Green
Roofs in Carbon Sequestration

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CONTENTS

Page 312

Introduction

The sustainable practice known as green roofs and walls have become widely used to reduce the effects of climate change and enhance the liveability of urban areas. The green roof is known as a living system and is able to store carbon in the long term. A green roof's vegetation and soil medium is also able to capture and store air pollutants from the surrounding environment, making the practice popular in urban areas. The 'long term green roof effect' is an indirect impact of green roofs in which less energy is used to power buildings leading to a reduction in fossil fuel consumption.

01 Green Roof Viability in Scotland

The following chapter gives a brief outlook on policies in Europe and the UK

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1.1 Context Policy in Europe

1. SCOTLAND:
Has no mandatory policy for Green roof infrastructure and current planning guidelines place little weight of 'expectation' on developers to integrate green roofs into development. How is this achieved in the rest of the UK and Europe…

2. LONDON:
No mandatory policy, but successfully increasing green roof infrastructure through the land-use Planning System for the past 10 years, notably through The London Plan.

3. PARIS:
Has an ambitious target of installing 100 hectares of green roof and walls by 2020, through the Paris Culteurs. France is the only country in the world to have a law that encourages green roofs, requiring all new commercial developments across france to integrate green roofs or solar panels. Installed 1million m2 of green roof in 2017.

4. ROTTERDAM AND AMSTERDAM:
Incentives since 2008. Target of achieving 600,000m2 of Green Roof Infrastructure by 2025.

5. COLOGNE, MUNSTER, MUNICH, STUTTGART AND BERLIN:
All have reductions in storm water fees if Green roofs are installed or retrofitted.

6. STUTTGART:
Requirements for all new developments to have Green Roofs. Stuttgart, Hamburg and Frankfurt have had funding programmes for green roofs and walls, paying 50% of costs up to a value of 10,000 Euros. These have now been phased out.

7. BERLIN:
Many German cities have mandatory targets for achieving green space. Berlin use the Biotope Area Factor.

8. BASEL:
Since 1996 under the Building and Construction Law, the city requires green roofs on all new developments with flat roofs. After 2002, Green roofs have to be designed to maximize biodiversity. There are also financial incentives.

9. COPENHAGEN:
Mandatory green roof policy for all new buildings with pitches less than 30 degrees.

10. MALMO:
Using the Green Space Factor and Green Points systems, to promote Green Infrastructure.

11. STOCKHOLM:
Green Space Factor is used as a Planning tool. This is a requirement for all property developers building on land owned by the city.

Source of Information: Living Roofs and Walls from policy to practice 10 years of urban greening in London and beyond

Page 315

1.2 Policy and Development in London

SUMMARY:

Most central European Cities have mandatory policies and incentive programmes to promote green roof infrastructure. These cities have been able to significantly increase their green roof per capita (m2/ inhabitant) as demonstrated in Table A below.

London on the other hand has created a successful mechanism for change without a mandatory system or incentive programmes. By placing Green Infrastructure at the heart of a Spatial Development Strategy, this has creating an environment where there is an expectation that green infrastructure will be provided with new developments.

London has a relatively short history of implementing Green Roof Infrastructure and does so primarily through the land use planning system. Since 2008 the London plan has provided the strategic planning policy framework which influences policy development in local boroughs.

2008: Introduction of London Living Roofs and Walls Policy

2011: Update to The London Plan to include Chapter 5 ' Urban green Policy'

2016: London Plan updated to include policy 2.18 'Green Infrastructure',

capturing both the urban greening and green roof policies

Since 2010 the total amount of green roof has doubled and the London market accounts for over 40% of the UK's Green Roof Industry.

	Population	Total area of green roofs (m²)	Green roofs per capita (m²/inhabitant)
Basel	175,131	1,000,000	5.71
Stuttgart	590,000	2,000,000	3.38
Linz	193,814	500,000	2.57
Munich	1,450,381	3,148,043	2.17
Vienna	1,714,000	2,560,000	1.49
Malmö	303,000	400,000	1.32
Hanover	522,686	638,500	1.22
London's CAZ	**230,000**	**205,000**	**1.21**
Düsseldorf	588,169	698,000	1.19
Berlin	3,600,000	4,000,000	1.11
Washington D.C.	681,170	254,470	0.37
Rotterdam	634,661	235,000	0.37
Amsterdam	813,562	300,000	0.36
Melbourne City	148,000	54,000	0.36
Portland	570,000	157,989	0.27
Chicago	2,700,000	508,130	0.19
Tokyo	13,184,161	1,345,250	0.10
Toronto	2,615,060	250,000	0.09
Singapore	5,100,000	468,000	0.09
Copenhagen	510,000	40,000	0.07

The figures have been collated from various cities and organisations and from work as yet unpublished by Humboldt University. Data collection methods vary. It should be noted that figures for London relate only to the Central Activity Zone as data for the Greater London area for 2015 are not available.

1.3 Scotland

Scotland's major cities have growing populations and with that comes a greater pressure on our cities infrastructure. Increased density puts a greater strain on the following:

- Surface water management
- Urban cooling
- Biodiversity
- Air quality
- Health and well being
- C02level
- Noise pollution

Green roof infrastructure helps to address all of these things. However, the use of Green Roof Infrastructure is not commonplace. This may be due to a number of factors - economic, lack of awareness of their benefits but the major one is a lack of policies to drive uptake.

Codes of Practice:

There are no British Standards to guide specifiers and contractors as to the best methods. The most widely accepted Code of Practice amongst leading suppliers in the UK is the German FLL. There is also the GRO code. The GRO is a partnership of industry and stakeholders collaborating to develop guidance for specification, design, manufacturing, installation and maintenance.

Scotland is broadly striving for greener cities in line with zero carbon targets but what mechanisms could be improved to increase and promote the use of Green roof Infrastructure in Scotland:

- **Are there mandatory policies that can be introduced?**

- **Are there incentives for developers for both new development and existing structures that could be introduced?**

- **Are there changes to national and local strategy policy that could be developed to embed green roofs to ensure that this is a consideration for all future developments**

02 Green Roofs

Following is an introduction to green roofs, an outline of their benefits along with a description of the different green roof systems available.

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2.0 Green Roofs

Benefits of installing a green roof:

- Adding mass, thermal resistance and absorbing less heat than regular roofs, so you reduce the carbon footprint and the urban heat island effect

- Creating a habitat for animals and insects. As well as directly providing an environment and food supply, planted roofs also cool and humidify the surrounding air, creating a beneficial microclimate

- The vegetation in green roofs can filter out carbon dioxide, nitrates and other harmful materials. This also helps improve local air quality, which can benefit both humans and animals. (you can expect to hear much more on the subject of air quality and over-heating throughout 2021)

- Depending on the green roof design, the immediate water run-off can be reduced considerably – by as much as 90 per cent, reducing stress on drainage systems and in turn helping to mitigate localised flooding

- Plants are also effective at reducing noise, as they provide natural sound insulation; they can reduce reflected sound by up to 8dB.

Examples of Green Roofs

Page 319

2.1 Carbon Sequestration and Wider Benefits of Green Roofs

Carbon Sequestration:

Green roofs help reduce carbon dioxide in the environment in two ways:

1. Green vegetation directly decreases CO2 in the air through photosynthesis, storing the carbon in plants and roots

2. Urban vegetation can reduce the amount of heat absorbed by the buildings, reducing the building's cooling demand.

Vegetation takes in carbon dioxide from the air and stores it as carbon in the tissues of the plants as it grows. This carbon is deposited in the roots, leaves, and stems of plants as they develop. Some of this carbon will be deposited or left in the soil or substrate during the life of the plant, where it will decompose and turn into humus, or soil, offering a longer-term carbon store. This carbon storage in the soil or substrate will keep growing as the plants develop over many years, resulting in a net sequestration of carbon. However, it is important to note that soils also naturally release carbon through the respiration of the microbial and fungi species that inhabits it.

As with all construction, the materials used to construct the green roof have a carbon cost. A green roof can only be called a net carbon sequester once it has stored the same amount of carbon as it took to build it. As a result, it is critical to evaluate the various components of a green roof and, if feasible, reduce their carbon footprint. The following are key components of a green roof system that significantly contribute to its carbon footprint:

- Substrate (artificial lightweight aggregate, transport to site)
- Drainage and filter layers (plastic materials)
- Maintenance (petrol driven tools, irrigation systems, water, pumps)
- Plants (resources to produce pre-grown vegetation or seed)

Wildlife and Biodiversity:

Green roofs can be thought of as green'stepping stones' for wildlife, and, if well planned, they can support a variety of flora and fauna unattainable on traditional roofs. However, green roofs do not directly replace ground-based habitats, and they are not a part of a ground-level "green corridor." Different habitats and species will be supported by various types of green roofs, substrates, and plants. It is possible to create biodiverse roofs that resemble distinct environments. They can be particularly useful as a means of reviving the pioneer (wasteland) villages that are occasionally lost during redevelopment. The most biodiverse places are frequently abandoned brownfield lands found in urban settings. The best designs frequently support a variety of substrates, microhabitats, and substrate depths to support a variety of wildlife habitats. To achieve the goals of local Biodiversity Action Plans, green roof designs should vary across the UK. Additionally, certain endangered species' habitats can be recreated using green roofs.

Wellbeing:

Green roofs, especially dense and easily accessible rooftops, provide extra health benefits. In order to boost welfare and offer a sanctuary from the stresses of city life, additional accessible green spaces can be created in dense urban buildings, such as podium deck gardens and resident roof terraces.

Urban Cooling:

Water within the planting areas can help contribute to reducing the Urban Heat Island Effect (UHIE). As buildings heat up and the UHIE increases, so does the need for cooling. Green roofs can help with this as the plants and soil evaporate moisture. This process of evapotranspiration cools the air around the building. In doing so reducing the need for cooling and helping reduce the UHIE.

2.2 Green Roof Systems

When constructing a green roof there are some fundamental considerations that determine the system required to support the planting scheme. The key decisions are about access and what the roof is to be used for, is it for nature conservation and biodiversity or aesthetics? How will the area be used and how much maintenance will be possible.

Green roofs are classified in two main categories: extensive and intensive.

1. **Extensive green roof:** has a growth medium depth of 3 to 6 inches.
2. **Intensive green roof:** any green roof with a soil, or growth medium, depth greater than 6 inches.

1. Extensive

USE: For ecological benefits
MAINTENANCE AND COST: Low
SUBSTRATE/VEGETATION: Sedum or wildflower

· Extensive green roofs are most commonly used as they are lightweight and relatively low maintenance

· Generally, public access is not expected to be provided on this type of green roof, nevertheless, they remain a popular choice, as they are lightweight.

1A. Extensive Sedum

USE: Lightweight roofs and ecological benefits
MAINTENANCE AND COST: Low
SUBSTRATE/VEGETATION: Sedums

· Extensive green roofs are most commonly used as they are lightweight and relatively low maintenance.

· Generally, public access is not expected to be provided on this type of green roof, nevertheless, they remain a popular choice, primarily for ecological benefits they are lightweight

· One of the most appealing benefits of this green roof type is that it can be installed on new developments or on an existing one (weight permitting).

· Sedum are drought and wind tolerant and therefore should remain green all year round, though they do need irrigation in extended drought events.

· Sedum mats - these mats have base layer of polyester with a growing medium placed on top. The sedum seeds are then dispersed on top of this layer. The mat should be laid on at least 60mm of substrate.
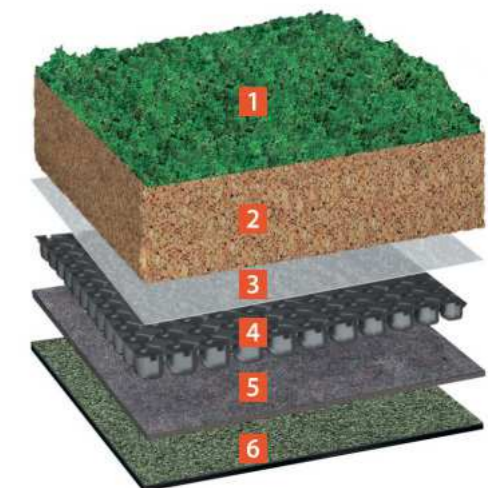
1. Sedum blanket
2. Substrate (Typically 60-80mm)
3. Filter Fleece
4. Water Retention and drainage
5. Protection layer
6. Waterproofing system

Source: Bauder

1A. Extensive Wildflower Biodiverse

USE: Ecological benefits with a particular focus on biodiversity
MAINTENANCE AND COST: Low
SUBSTRATE/VEGETATION: Blended substrate/native wildflowers/grasses/succulents

- A biodiverse roof is used for its ecological benefits. They consist of a blended substrate planted/seeded with wildflowers/grasses and succulents or wildflower turf.

- Due to increased depth of substrate, biodiverse green roofs increase the ecological benefit (stormwater, acoustics and thermal properties etc) whilst also providing important habitat for wildlife.

- Maintenance is low for this type of green roof, after two years they are relatively self-maintaining

- They contribute to achieving additional BREEAM points by improving air quality and assisting in controlling rainwater run off of this layer.

1. Vegetation: Native seeds and plug mixes in combination with other habitat features.
2. Biodiverse substrate
3. Filter fleece
4. Water retention and drainage
5. Protection layer
6. Waterproofing system

2. Intensive

USE: Roof gardens
MAINTENANCE AND COST: High
SUBSTRATE/VEGETATION: Herbs, flowering plants, taller grasses, larger shrubs, trees etc

- Intensive green roof require the deepest soil and it has the greatest impact on the structure beneath it.

- Effectively, all planting types are accommodated for this type of green roof. In a design in which you expect users to interact with the roof, this is the most suitable choice, as you can create a park-like setting.

- Garden and park roofs are capable of storing vast amounts of rain water, therefore they create good Sustainable Urban Drainage Systems (SUDS). This provides an effective thermal barrier too.

- Depending on the type of vegetation planted, this green roof type can be extremely effective for biodiversity.

- Maintenance is high because they must constantly be watered or trimmed etc, in order to maintain an enjoyable environment. They essentially require the same amount of maintenance as parks.

- The degree of maintenance depends heavily on the type of vegetation planted.

1. Intensive planting
2. Intensive substrate (typically 200-250mm)
3. Filtration later
4. Drainage board
5. Protection Later
6. Separation and slip layer
7. Waterproofing

Source: Bauder

Source: Bauder

2A. Semi-Intensive

USE: In visible areas
MAINTENANCE AND COST: Periodic/ Medium
SUBSTRATE/VEGETATION: Herbs, flowering plants,
taller grasses and small shrubs.

- Semi-intensive green roofs are heavier than extensive green roofs. As such, they are used less commonly.

- They require a deeper substrate. Periodic maintenance. However, the benefit of this is that a more diverse range of planting can be utilised; particularly ones that need more nutrients than those that can be used in extensive green roofs.

- Because they have an aesthetic appeal, semi-intensive green roofs are used in projects where the roof is visible.

- Maintenance for this green roof system more frequent than extensive systems, however, it does not exceed maintenance of regular planters

1. Intensive planting
2. Intensive substrate (typically 200-250mm)
3. Filtration later
4. Drainage board
5. Protection Later
6. Separation and slip layer
7. Waterproofing

Source: Bauder

3. Solar Green and Biosolar

USE: Providing solar energy for buildings
MAINTENANCE AND COST: Low
SUBSTRATE/VEGETATION Extensive and intensive green roofs can be integrated

- This is a system where green roof and solar technologies are integrated. Most commonly used on extensive green roofs, biodiversity is maximised and solar gain is boosted.

- Sometimes the solar element of the green roof takes precedence and this is when it is unsuccessful. The success of this system lies in the integration of solar mounts within the engineered layers of the green roof itself.

- Light and rain can penetrate beneath the solar panels. Solar arrays create different micro-climates, increasing biodiversity potentials.

- Extensive roofs are most suited to the installation of solar panels, however, they are being increasingly installed on intensive green roofs too, providing shade on rooftop gardens.

- Water run-off provides irrigation for vegetation planted beneath.

Note: Solar green roofs (as opposed to biosolar green roofs) are where the solar mounting system is not integrated into the green roof system. Generally this will mean that the solar-panel system is separate to the green roof system. Biosolar roofs are where the solar mounting system is integrated into the green roofs system. There currently three integrated systems in the UK market supplied by Bauder Optigreen and Zinco.

2.3 Green Roofs for Retrofit

4. Blue Green Roof

USE: Retaining and reusing rain water
MAINTENANCE AND COST: Low
SUBSTRATE/VEGETATION: Extensive and intensive
green roofs can be integrated

- Blue roofs combine blue and green roof technologies. Whilst standard green roofs use conventional drainage layers, blue roofs aim to increase water volume and control water released.

- A blue roof retains¬¬ rain fall within the roof structure before discharging it in a controlled manner.

- Blue roofs are designed for water retention above the waterproofing part of the roof. This is different from conventional roofs, where water is drained rather than stored.

- It is a form of Sustainable Urban Drainage Systems (SUDS) to help alleviate urban flooding caused by run-off.

- Unlike other forms of SUDS, blue roofs make use of spaces that may otherwise be redundant without extending beyond building footprints.

Source: Bauder

Green roofs are often associated with newly constructed buildings; however, in some cases, green roofs can be installed on existing buildings. Many older structures were overdesigned/engineered and have spare structural capacity, allowing green roofs to be installed without additional construction. In contrast, many recent buildings and industrial units are built to near-capacity.

¬Before planning a green roof, in all circumstances, the load-bearing capacity of a building must be determined, and the guidance of a structural engineer is crucial. When retrofitting a green roof, it is critical to determine whether the installation will exceed the building's existing structural capability and the extent to which this will need to be altered to sustain the installation. Once the general loading capacity of the structure is determined, as well as any strong or weak loading places, the green roof can be designed to suit, or the building's capacity can be modified. In some cases, it is possible to strengthen an existing roof in critical locations (rather than the entire roof) in order to obtain the desired outcome and also minimise costs.

If the present waterproofing appears to be in good condition, the water tightness should be evaluated. If the waterproofing layer is in poor condition, it should be changed or covered with a new waterproof coating. The protection provided by the green roof will help the waterproofing beneath remain in good condition for many years after installation. If the existing in-situ waterproofing is to be used, it must be root resistant, or a separate root resistant membrane can be installed before the other green roof parts are laid.

When designing a green roof, a level of water retention within the layers and substrate will be anticipated. It is critical to the roof's performance that any excess water be drained from the roof as quickly as possible. This will keep the roof from ponding or becoming overloaded.

Because most existing structures have weight restrictions, extensive green roofs are better suitable for retrofits. Intensive green roofs offer more planting options but often weigh significantly more than extensive roofs.
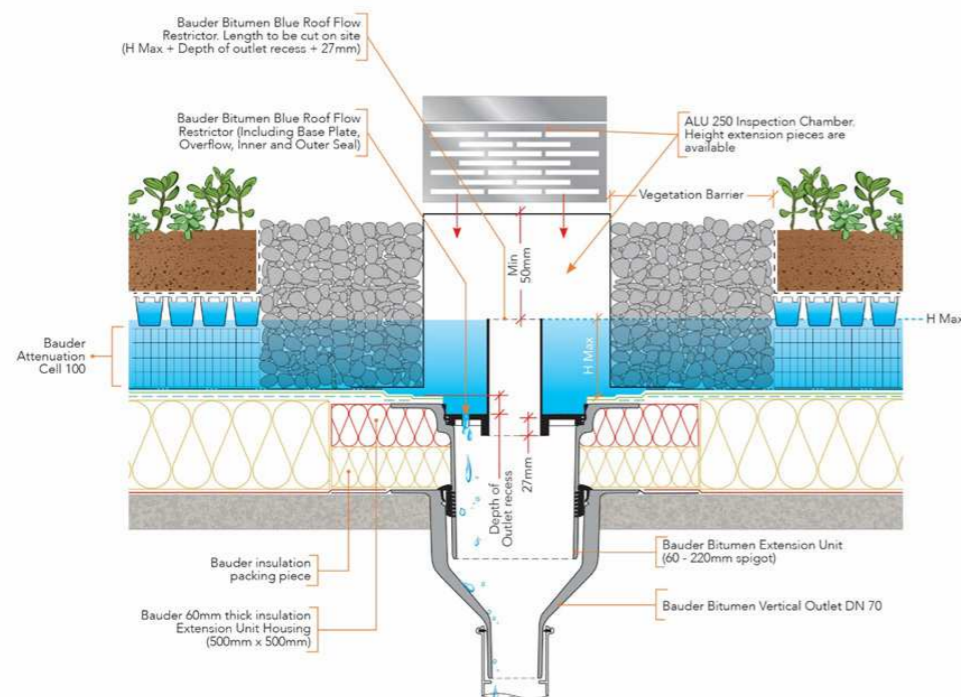
03 Green Walls

Following is an introduction to green walls, an outline of their benefits along with a description of the different green wall systems available.

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3.1 Green Walls

A green wall is a vertical structure which is covered with vegetation by design. It uses a similar medium as the green roofs described previously with a sedum substrate which is applied vertically.

Benefits of installing green walls:

·   Remove air pollutants.
·   Reduce urban temperatures.
·   Thermal benefits to buildings.
·   Improve biodiversity.
·   Attenuate Rain water.
·   Reduce noise.
·   Increase productivity & creativity.
·   Improve sense of well-being.

3.2 Green Wall Systems

There are three types of common systems: panel/modular systems, tray systems and freestanding walls

A. Panel/modular systems:
Plants are pre-grown into panels that can be used inside or outside, and in any type of climate. This is the most common type of system used for external building facades.

1.   Support system
2.   Waterproof backing board
3.   Rear drainage layer
4.   Aluminium rails and dripline
5.   Capillary breaks
6.   Growing medium
7.   Panel box
8.   Plants
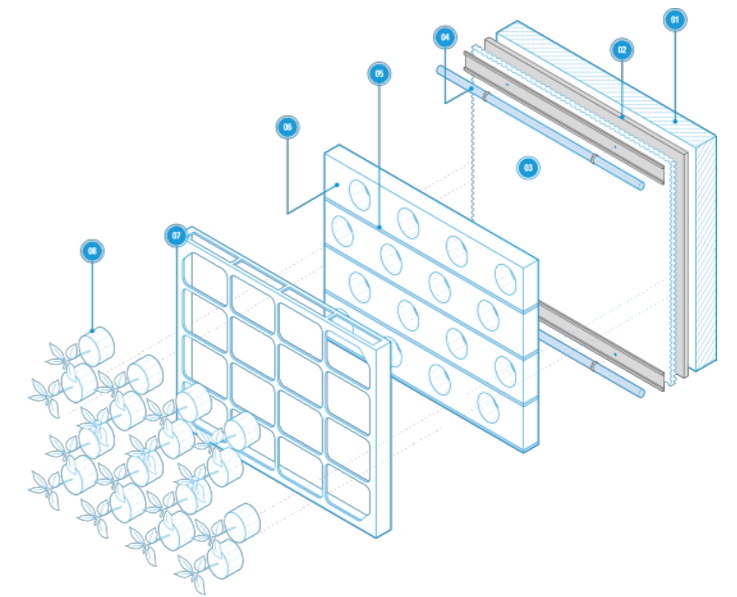
Based on Bioticture's living wall system

B. Tray systems:
Plants are pre-grown off-site and inserted into the wall, which allows for a great degree of design flexibility, especially since trays can be easily removed and replaced. Typically cheaper than panel systems, tray systems are most commonly used in interior settings.

C. Freestanding walls:
Freestanding walls are smaller, movable living walls that can be placed in indoor or outdoor settings. They can be placed against a wall or in the middle of a room, and are ideal for temporary spaces or floor plans that change over time. They can also be used as partitions or room dividers.

04 Cost Estimates

The following is a high level estimate cost study for the maintenance of green roofs and living walls using standard industry estimating rates.

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4.1 Cost Estimates

The information below provides an outline estimate of the likely annual maintenance costs associated with green roofs and living walls. Location/design and other variating factors will ultimately have an effect on the overall cost.

Green Roof

The outline estimate assumes an extensive, low maintenance / biodiverse green roof design.
A total per m2 rate has been developed from annual costs for the following maintenance operations:

· Visual inspection twice per annum
· Weed twice per annum
· Annual cut back of vegetation
· Clear gullies / drainage
· Allowance for irrigation in extreme weather to avoid plant losses (likely not required each year)
· Allowance for periodic replacement / infill planting (infrequent – not required each year)
· The following has also been added to the total costs for the operations above:
· Allowance for access constraints (+20%)
· Allowance for preliminary costs (+15%)

Following the application of the rates above the outline annual per m2 cost for ongoing maintenance is an estimated £10.07 per m2.

£7.30	Sub total
£8.76	Allowance for access constraints (+20%)
£10.07	Allowance for preliminary costs (+15%)
£10.07	**Total estimated annual maintenance (1m2)**

It should be noted that access constraints, design of roof, health and safety measures, location and other factors will all have an impact on ongoing maintenance costs which cannot all be accounted for as part of a high-level estimate. No allowance has been made for inflation. No allowance has been made for any ongoing surveys, engineers surveys, repair / replacement of sub-structure / drainage features, or replacement of substrates. Estimates of how this rate would apply to different roof sizes is set out below.

Rates have been sourced from Spon's External Works and Landscape Price Book (2023).

Green Roofs

Example Maintenance Area	Annual Maintenance Cost Estimate (rounded)
10–30sqm	£300.0
30–70sqm	£700.0
70–100sqm	£1,000.0
100–150sqm	£1,500.0
150sqm +	£2,000.0

Living Wall

Spon's External Works Landscape Price Book (2023) provides estimated total annual costs for living wall maintenance. Estimated costs allow for regular visits to maintain planting and systems; inclusive of feeding; pest control and calibration of irrigation systems.

Example Maintenance Area	Annual Maintenance Cost Estimate (rounded)
10–30sqm	£300.0
30–70sqm	£700.0
70–100sqm	£1,000.0
100–150sqm	£1,500.0
150sqm +	£2,000.0

05 Case Studies

The following is a series of case studies of
green roofs being used in Scotland across
a range of buildings from industrial to small
scale residential.

COLLECTIVE
ARCHITECTURE

5.1 Cairns Distillery

Case Study: Cairns Distillery
Location: Grantown on Spey, Cairngorms

The new distillery in Grantown on Spey opened its doors in 2022. It is owned by Gordon & MacPhail, and the vision for the building was to reflect its surroundings.

The sedum green roof is one of the largest installed in the Cairngorms National Park and is approximately 900 square metres. The roof, being located on the banks of the River Spey has become a haven for bees.

5.2 Macallan Distillery

Case Study: Macallan Distillery in Craigellachie
Location: Aberlour, Moray

The Macallan Distillery, designed by Rogers Stirk Harbour + Partners is located in Speyside which is a designated area of great landscape value, therefore the distillery was designed to be as sensitive as possible to its context. The wildflower green roof was designed to be an extension of the surrounding landscape.

Photographs of the Cairns Distillery and its green roof
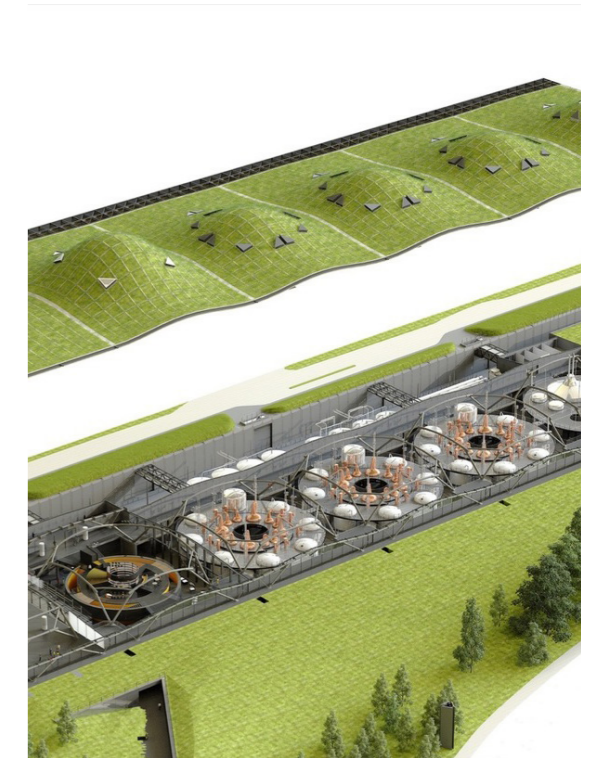
Photographs of the Macallan Distillery and its green roof

5.3 Gallie Craig Coffee House

Case Study: Gallie Craig Coffee House
Location: Stanraer, Dumfries & Galloway

The building is positioned at the most southerly point of Scotland close to vertical cliffs. Due to its exposed location and its position in a nature reserve, the building aimed to be as environmentally sensitive as possible.

The green roof used a similar grass which grew in the surrounding landscape to blend the building into its surrounding.

Photographs of the Gallie Craig Coffee House and its green roof

5.4 Findhorn Eco Village

Case Study: Findhorn Eco Village
Location: Findhorn, Moray

The eco village is a residential community in Findhorn, Moray Scotland. The aim of the community's architecture is to be as ecologically sustainable as possible and maintain a low carbon footprint. Their buildings are built from sustainable and where possible locally sourced materials. Some of the roofs in the village are roofed in sedum green roofs with native plants.
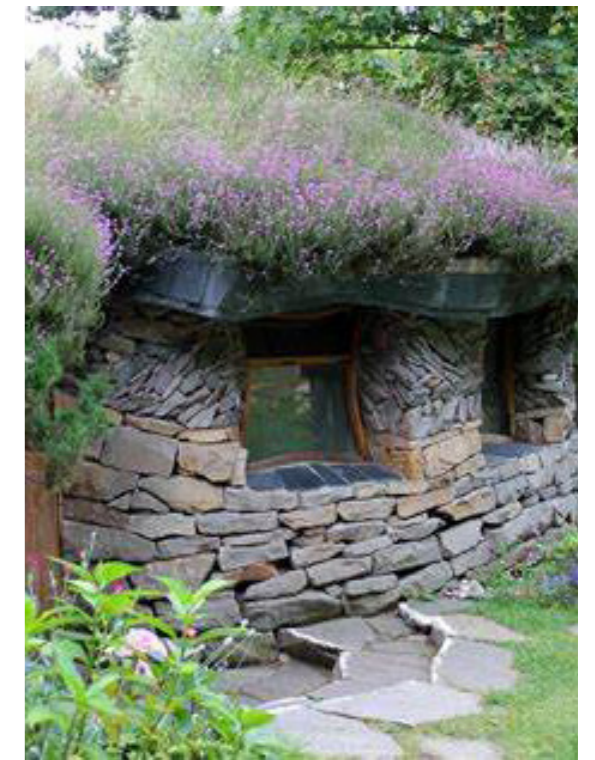
Photographs of a residence in the eco village

5.3 Domestic Green Roof

Location: St. Andrews, Fife,

The installation of a sedum roof to a residential extension in St Andrews was initially received with scepticism from the Planning Authority due to the non-traditional nature of the proposals, however, permission was granted and the roof installed in Spring 2013. Subsequently, the owner has planted bulbs and alpine flowers to increase the biodiversity value of the roof.

Photographs by Muir Dorrans, Architect

Page 333

Conclusion

Typically, over the course of their lifetime, green roofs and walls become net carbon sequesters. The length of time it takes, however, is determined on the construction of the green roof how it develops, and where it is located. Additionally, it is crucial to keep in mind that not all advantages of green roofs/walls must be directly related to carbon. For instance, green roofs offer a variety of ecosystem services, such as the reduction of air pollution and the improvement of recreational space, all of which still significantly benefit urban areas and make them more liveable and are therefore equally important to consider.

REPORT TO: SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024

**SUBJECT: NATIONAL PLANNING FRAMEWORK 4 POLICY 11c)-
MAXIMISING NET ECONOMIC IMPACT DRAFT
SUPPLEMENTARY PLANNING GUIDANCE**

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

1. **REASON FOR REPORT**

1.1 This report asks Council to agree the draft Maximising Net Economic Impact
Supplementary Planning Guidance and that it be subject to public consultation
for a period of 12 weeks.

1.2 This report is submitted to Committee in terms of Section II (13) of the
Council's Scheme of Administration relating to approval of Council Reports
and Strategies of a corporate nature including Local Development Plans.

2. **RECOMMENDATION**

2.1 **The Council is asked to:**

**(i) agree the draft Maximising Net Economic Impact Supplementary
Planning Guidance and that the draft is made available for public
consultation for 12 weeks;**

**(ii) agree that responses to the draft be reported back to a future
meeting of the Planning and Regulatory Services Committee; and**

**(iii) agree that external consultancy support is commissioned to work
with officers and partners to develop a Regional Socio- Economic
Impact Plan.**

3. BACKGROUND

3.1 National Planning Framework 4 (NPF4) was approved on 13 February 2023 and introduced a suite of new policies which now form part of the Development Plan for Moray. Policy 11c) has introduced a step change in the assessment of renewable energy developments, including a requirement that proposals for energy developments will only be supported where they "maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Policy 11c states;

"Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

To maximise the net economic impact of renewable energy developments in Moray, applicants will be expected to provide a Net Economic Impact Maximisation Plan against where delivery will be secured, where appropriate, through planning conditions and/or planning obligations."

3.2 Moray Council and Highland Council jointly commissioned work to look at the net economic impacts of onshore wind and the operation of community benefits to determine what is needed to ensure that net economic benefit is maximised.

4. PROPOSALS

4.1 The key messages from the work set out in BIGGAR Economics' report to Moray Council and Highland Council (January 2024) (**Appendix 1)**, that are important to maximise net economic benefit are as follows:

- The voluntary nature of collaboration between developers and communities.
- Leaving scope for innovation and bespoke solutions and opportunities
- A planned approach is crucial for maximisation.
- The approach should be holistic.
- It should enable rapid deployment and not be a barrier.
- Ensure high local supply chain content.
- Bespoke local employment and skills training.
- Fair contributions for enabling infrastructure.
- Fair community benefit packages.
- Continued innovation.

4.2   Taking account of these issues, officers have developed draft guidance **(Appendix 2)** to aid interpretation and delivery of NPF4 Policy 11c). The guidance applies to the following thresholds of development;

- all forms of renewable energy development onshore or offshore greater than 5MW
- energy generation, storage, new and replacement transmission and distribution infrastructure
- emerging low carbon technologies including hydrogen and carbon capture utilisation and storage and thermal energy storage.

4.3   The Guidance requires developers to prepare and submit a Net Economic Impact Maximisation Plan (NEIMP) to take a proportionate approach and set out the information requirements set out in the Guidance. The NEIMP will be a material consideration for planning purposes and therefore subject to planning conditions to ensure the development complies with the requirements of Policy 11c). The NEIMP must also include consideration of Policy 25 Community Wealth Building and associated guidance.

4.4   It is proposed to commission external consultancy support to work with the Council and partners to develop a Regional Socio Economic Impact Plan which will be funded from existing budget within Strategic Planning and Development. The Plan will aim to deliver regional socio-economic impacts and developers will be guided to contribute to this fund or alternative interventions that deliver regional socio-economic impacts directly as a way of meeting the requirements of Policy 11 c) and the local guidance.

4.5   The guidance requires developers to propose regional and local solutions taking account of the interventions set out in the Regional Socio Economic Impact Plan, regional and local development plans and economic interventions when proposing solutions. To aid this work a Developer Obligation will be taken towards the provision of Community Wealth Building Officers to assist in developing regional interventions around infrastructure, local plans, skills and barriers to employment and economic development and to assist developers with local engagement and community ownership models for the region. This commuted sum will be taken at the rate of £200 per MW installed per annum with the first trigger being paid on the date the Planning Permission is issued. If Developers seek to deliver similar regional economic benefits through equivalent means then they should demonstrate how this meets the objectives of the Regional Socio Economic Impact Plan.

4.6   It is proposed that the draft Guidance is made available for formal consultation for a period of 12 weeks and responses are reported back to a future meeting of the Planning and Regulatory Services Committee.

5. **SUMMARY OF IMPLICATIONS**

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

The draft guidance aims to deliver key socio-economic benefits to support regional challenges which supports the Corporate Plan.

(b) **Policy and Legal**

The draft guidance is non statutory supplementary planning guidance.

(c) **Financial implications**

There will be a cost associated with commissioning consultants, estimated to be approximately £20,000. This will be met from the budget for economic strategy work.

(d) **Risk Implications**

There is a risk that without having guidance in place and not developing a regional approach, then the aspirations of NPF4 to maximise socio-economic benefits from energy developments will not be realised.

(e) **Staffing Implications**

This work will have significant staffing implications for Strategic Planning and Development in commissioning and working with consultants and partners and in the future delivery of the guidance. The short term effects will impact upon other workload and the delivery phase will require additional staffing resource to be considered when this is reported back after engagement.

There will also be an impact upon Procurement to support unplanned work.

(f) **Property**

None.

(g) **Equalities/Socio Economic Impact**

None.

(h) **Climate Change and Biodiversity Impacts**

None arising from this report, however there are potentially significant benefits of taking a regional approach as a number of carbon reduction and biodiversity gain projects could be supported.

(i)   Consultations

The Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Head of Governance Strategy, the Chief Financial Officer, the Democratic Services Manager, the Principal Climate Change Officer and the Equalities Officer have been consulted and comments received have been incorporated into the report.

6.   CONCLUSION

6.1   National Planning Framework 4 introduced a suite of new policies which now form part of the Development Plan for Moray. Policy 11c) has introduced a step change in the assessment of renewable energy developments, including a requirement that proposals for energy developments will only be supported where they "maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

6.2   To support implementation of Policy 11c, draft supplementary guidance has been prepared which will be subject to public consultation. Work will be commissioned to develop a Regional Socio Economic Impact Plan, to support the guidance.

Author of Report: Jim Grant, Head of Economic Growth and Development and Gary
                            Templeton, Strategic Planning and Development Manager

Background Papers:
Ref: SPMAN-813460984-502

Development Plan Moray Guidance – Maximising Net Economic Impact NPF4 Policy 11 c)

Introduction

This Guidance sets out the Council's approach to ensuring that energy development proposals maximise net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities and achieve a lasting legacy.

Relevant NPF4 policies include Policy 11 (Energy), Policy 18 (Infrastructure First) and Policy 25 (Community Wealth Building).

Policy 11 c) of NPF4 has introduced a step change in the assessment of renewable energy developments in terms of **only** being supported where they Maximise Net Economic Impact including local and community socio economic benefits such as employment, associated business and supply chain opportunities.

Policy 11c) states:
Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

To maximise the net economic impact of renewable energy developments in Moray, applicants will be expected to provide a Net Economic Impact Maximisation Plan against where delivery will be secured, where appropriate, through planning conditions and/or planning obligations.

Background

It is important to differentiate between the net economic benefits required under policy 11 c) and the voluntary community benefits that may be provided by developers to communities as described in Scottish Government's "Community Benefits from Onshore Renewable Energy Developments". Voluntary community benefits can provide socio economic benefits but as they are voluntary in nature and do not form part of the planning system and are not a material planning consideration. Socio economic benefits arising from voluntary community benefits are not therefore part of the consideration of compliance with policy 11 c). (See separate section on non-voluntary Community Benefit).

Moray Council commissioned work to look at the net economic impacts of onshore wind and the operation of community benefits to determine what is needed to ensure that net economic benefit is maximised.

The key messages from that work, as set out in BIGGAR Economics' report to Moray Council and Highland Council (January 2024), that are important to maximise net economic benefit are as follows:

- The voluntary nature of collaboration between developers and communities.
- Leaving scope for innovation and bespoke solutions and opportunities
- A planned approach is crucial for maximisation.
- The approach should be holistic.
- It should enable rapid deployment and not be a barrier.
- Ensure high local supply chain content.
- Bespoke local employment and skills training.
- Fair contributions for enabling infrastructure.
- Fair community benefit packages.
- Continued innovation.

This guidance sets out how Moray Council will support the assessment of NPF4 Policy 11 c) and how it aims to deliver against the key findings of the report on maximising net economic benefit.

This guidance requires developers to take into account the interventions set out in the Regional Socio-Economic Impact Plan and their own continuing direct engagement with communities, developers should consider regional and local development plans and economic interventions when proposing solutions.

The Biggar Economics Report Jan 2024 noted that not all communities are equal in terms of both capacity to work with developers but also access to funds from renewables. We are therefore proposing that developers must demonstrate that they provide net economic impacts at both a local and regional level.

Threshold

This guidance will apply to:

- all forms of renewable energy development onshore or offshore greater than 5MW
- energy generation, storage, new and replacement transmission and distribution infrastructure
- emerging low carbon technologies including hydrogen, thermal energy storage and carbon capture utilisation and storage.

Aims of Guidance

The guidance aims to support developers in meeting the requirements of Policy 11 c) through addressing how development proposals can maximise net economic impact and address regional economic priorities, Policy 25 Community Wealth Building and Policy 18 Infrastructure First through:

- Increasing employment opportunities by helping local businesses to grow and diversify.

- Increasing local spend within the local area through increased use of the local supply chain.

- Providing local employment and skills development opportunities within the local area, particularly within areas of highest inequalities.

- Providing opportunities for related new business start-ups in the area.

- Providing opportunities for community ownership of business and assets. For the purposes of this guidance, a "local person" is a person with a permanent address in the Moray Council administrative area and a "local business" means a business based in, or having a significant permanent physical presence in Moray. The "North and North East Scotland" refers to the Moray, Highland, Aberdeenshire and Aberdeen City administrative boundaries.

The Council is committed to supporting community wealth building and ensuring that energy developments provide a lasting legacy, Developers should consider the Council guidance relating to Policy 25 Community Wealth Building Strategy when developing proposals.

Developer Requirements

The requirements detailed in this guidance are intended to aide implementation of NPF4 and support delivery of the Development Plan for Moray. The guidance should be taken into account from the earliest stages of the development process to allow benefits to be maximised and for any associated costs to be factored into the project costs, viability and land value.

This guidance requires developers to propose regional and local solutions taking account of the interventions set out in the Regional Socio-Economic Impact Plan, regional and local development plans and economic interventions when proposing solutions.

To aid this work a Developer Obligation will be taken towards the provision of Community Wealth Building Officers to assist in developing regional interventions around infrastructure, local plans, skills and barriers to employment and economic development and to assist developers with local engagement and community

ownership models for the region. This commuted sum will be taken at the rate of £200 per MW installed per annum with the first trigger being paid on the date the Planning Permission is issued.

This is not intended to replace community development officers that may exist in communities as part of existing windfarm community benefit funds, it is intended that these officers will be able to:

- support the regional socio-economic impact plan together with local plan development.
- assist developers with community engagement and understanding of the planned interventions.
- assist communities with developer engagement and community ownership models and funding.
- act as liaison between regional economic development bodies and the community and the developer.
- Support supply chain development and liaison.
- Identify barriers to local employment in energy related sectors.
- Work with developers to secure regional interventions.

This provision is directly related to maximising the economic impact from all energy related developments in Moray in a way that cannot be achieved by each development operating independently.

Moray Council will, in conjunction with Moray Economic Partnership, develop a Regional Socio Economic Impact Plan to deliver regional socio-economic impacts and developers will be guided to contribute to this fund or alternative interventions that deliver regional socio-economic impacts directly as a way of meeting the requirements of Policy 11 c) and this local guidance. If Developers seek to deliver similar regional economic benefits through equivalent means, then they should demonstrate how this meets the objectives of the Regional Socio-Economic Impact Plan.

Process

Development proposals which fall within the thresholds outlined above are required to submit a Net Economic Impact Maximisation Plan with their planning application or energy consent application to support requirements of NMPF4 policy 11c).

Net Economic Impact Maximisation Plan (NEIMP)

The NEIMP should take a proportionate approach and set out the following information under these headings below to meet the requirements of NPF4 Policy 11 c).

The Plan must set out targets for each of the measures being proposed and details how the measures will be monitored and delivered.

It is important to note that the commitments made within the **NEIMP** will be a material consideration and therefore subject to planning conditions to ensure the development complies with the requirements of Policy 11 c).

Developers should include information taken from Economic Impact Studies associated with the proposal. These studies are often theoretical and based on industry case studies and do not necessarily reflect the reality of the development. Developers should only include the socio-economic impacts that they can commit to. The NEIMP must include consideration of Policy 25 Community Wealth Building and our associated guidance including: -

(i) Improving community resilience, reducing inequalities and maximising local job creation

(ii) Increasing spending within communities and ensuring the maximum use of local supply chains and services

(iii) Creation of related new local firms

(iv) Enabling community ownership of buildings and infrastructure

In addition, the NEIMP must include the following: -

(i) Planned Approach to ensure socio economic legacy

- Provide details of the local and regional plan used to inform the proposals contained in the NEIMP.

(ii) Maximising economic impact

- Demonstrate how the net economic impact of the development has been maximised through the measures proposed, including reference to the key messages outlined below.
    - The voluntary nature of collaboration between developers and communities.
    - Leaving scope for innovation and bespoke solutions and opportunities.
    - Utilisation of a planned approach.
    - The approach should be holistic in relation to socio economic benefit.
    - It should enable rapid deployment.
    - Ensure high local supply chain content.
    - Bespoke local employment and skills training.
    - Fair contributions for enabling infrastructure.
    - Fair community benefit packages.
    - Continued innovation.

The NEIMP should set out the details required above including how the NEIMP will be delivered and monitored and include a contact name for the delivery of the NEIMP. The NEIMP should provide an outline of the community engagement conducted in developing the plan and how the plan addresses the stated needs of the local community. Details should also be provided of future monitoring including a statement upon completion of the construction phase and one year into the operational phase if considered relevant by the Council. These requirements will be subject of a planning condition and formal review periods. Monitoring statements should set out the delivered outcomes compared to the targets set out in the NEIMP. Where information cannot be provided at the early stage of the planning process, the plan should outline the approach timing for provision of such information so that it can be conditioned.

Non-Voluntary Community benefits

As noted above, it can be that voluntary community benefits (which are not a material consideration in planning terms) can bring socio economic benefits. Developers should be careful to explain when community benefits are being provided to communities on a voluntary basis, and where benefits are being claimed in terms of Policy 11 c) and included in the NEIMP. In the latter case, such benefits will no longer be considered voluntary and will be considered to be a socio-economic benefit that the developer is committing to provide to meet the terms of policy 11 c by way of maximising the net economic impact of the proposed development. This does not impact on the community benefit packages offered but would provide communities with the security that those community benefits are no longer voluntary and would be a condition of planning for the lifetime of the development.

Support for preparing the NEIMP.

 Applicants are advised to make early contact with the Strategic Planning and Development section to discuss the NEIMP requirements by e-mailing localdevelopmentplan@moray.gov.uk. Officers within Strategic Planning and Development and the Economic Growth and Regeneration sections will support applicants in preparing their NEIMP and will suggest measures to include within the Plan, seeking to maximise local spend, skills development and employment opportunities.

Advice will also be available through the Council's pre-application service; details are available at http://www.moray.gov.uk/moray_standard/page_41669.html

Assessment of the NEIMP

The NEIMP must be submitted with the planning and S.36 and S.37 applications The Strategic Planning and Development section will be a consultee on the NEIMP when it is submitted and will liaise with the applicant as necessary and with planning and

economic growth and regeneration officers to inform the development management process. Once the content has been agreed as part of the consideration of the planning application, a planning condition and/or planning obligation will be applied to control its delivery.

REPORT TO: SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024

SUBJECT: DRAFT MORAY WOODLAND AND FORESTRY STRATEGY 2024

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

1.   REASON FOR REPORT

1.1   This report asks Council to agree the draft Woodland and Forestry Strategy as part of the evidence collated for the new Local Development Plan and to agree that the draft Strategy be subject to public consultation for a period of 12 weeks.

1.2   This report is submitted to Committee in terms of Section II (13) of the Council's Scheme of Administration relating to approval of Council Reports and Strategies of a corporate nature including Local Development Plans.

2.   RECOMMENDATION

2.1   The Council is asked to agree:

(i)   the draft Moray Woodland and Forestry Strategy 2024;

(ii)   the draft is made available for public consultation for 12 weeks; and

(iii)   that responses to the draft will be reported back to the Planning and Regulatory Services Committee.

3.   BACKGROUND

3.1   Moray is one of the most wooded regions in Scotland with 34% of the area covered with woodland, compared with a national average of 19% across Scotland.

3.2   Woodland and Forestry Strategies are a statutory requirement under the Town and Country Planning (Scotland) Act 1997 as amended. The Local Development Planning Guidance 2023 requires that the Local Development Plan Evidence Report (which is subject to a separate report to this meeting of Council) should be informed by an up to date Woodland and Forestry Strategy for the area.

3.3   The current Moray Woodland and Forestry Strategy was approved in 2018 with one of its primary uses being to steer new woodland planting under Scottish Forestry grants scheme.

3.4   To progress the new Strategy **(Appendix 1)**, Carol Anderson Landscape Associates was commissioned, funded jointly by Highlands and Islands Enterprise (HIE), Scottish Forestry and the Council who have worked in partnership to prepare the draft. The consultancy team included experts from forestry, landscape, economic impact and ecological backgrounds.

3.5   When approved the Strategy will be supplementary guidance to the existing Moray Local Development Plan 2020 (MLDP) and will form part of the new Moray Local Development Plan 2027 when approved. The Woodland and Forestry Strategy will also be used to inform the Regional Spatial Strategy, which will provide a strategic view of Moray's future land uses, taking account of growth, food production, infrastructure, Moray's outstanding natural and built environment and will also be subject to extensive consultation. The draft Woodland and Forestry Strategy covers the MLDP area, excluding the Cairngorms National Park Authority area which has its own Woodland Strategy.

3.6   The draft Strategy has been informed following wide reaching and in depth early engagement, including the following groups of consultees;

- Organisations involved in the planning and management of woodlands in Moray.
- Moray- based nursery growers and businesses involved in timber processing and the manufacture of timber products.
- Organisations involved with education and training in the forestry sector.
- Charitable organisations providing opportunities for young people to engage with woodlands in Moray.
- Charitable organisations providing opportunities for young people to engage with woodlands in Moray.
- NatureScot and other bodies with an interest in woodlands and nature conservation.
- Tourism bodies and Moray-based businesses involved with woodland-based tourism and recreation activities.
- The Joint Community Council and follow-up meetings with individual Community Councils were held separately if requested.
- Community groups who own and/or manage woodlands as well as the Community Woodland Association.
- Scottish Land and Estates (joint meeting held with a number of Moray-based estates) plus individual follow-up meetings held with some other estates who could not attend the SLE meeting.
- The National Farmers Union.

4. PROPOSALS

4.1 The purpose of the Strategy is to help deliver Scotland's transition to net-zero future and the Scottish Government's commitments on;

- Sustainable development and economic growth
- Mitigating the global climate emergency
- Reversing biodiversity loss
- Increasing community health and well-being

4.2 The Strategy will principally be used by landowners and managers, Scottish Forestry, the Council and stakeholders when considering woodland creation schemes, felling applications and Long Term Forest Plans.

4.3 The Strategy recognises that forestry is an important contributor to the Moray economy generating more than £39 million per year and providing direct employment for almost 1000 people. Forestry in Moray is a mature sector of the economy made up of the following inter linked activities;

- Primary forestry and timber extraction
- Processing of timber and manufacturing of woodland based products
- Services provided to support forest operations
- Tourism related activity based around visits to Moray's forests and woodlands

4.4 Moray is home to 90 forestry and timber processing businesses of which 80 are micro sized businesses with up to 9 staff, 10 are small businesses with up to 49 staff and 5 are medium sized businesses with up to 250 staff. The region plays an important role in underpinning the wider UK forestry and associated timber construction sectors. It is home to a well-established arboriculture sector that incorporates some of the UK's largest tree nurseries as well as some thriving and innovative timber engineering operations which make an important contribution to the construction sector.

4.5 The majority of Moray's woodland and forests accommodate tracks and paths for cycling and walking which are an invaluable resource for both local people and visitors to the area. There are a number of community owned/ managed woodlands in Moray.

4.6 Moray's woodlands and forests provide a wealth of benefits for the environment, hosting numerous protected animal species important to the area including red squirrel, black grouse and pine marten. Many of the woodlands are included in the Ancient Woodland Inventory, which are areas under continuous forestry cover since 1750, which have a rich and diverse soil value and other associated flora and fauna. Several of Moray's woodlands are considered to be of national and international importance for their biodiversity value and are designated Sites of Special Scientific Interest and/ or Special Areas of Conservation. In addition to biodiversity value, the woodlands and forestry support ecosystems including carbon storage, natural flood defences and improved air quality.

4.7   The draft strategy has identified a number of key issues to be addressed, which have been informed through early stakeholder engagement;

- Climate change
- Threats to existing woodlands and forests
- Barriers to the creation of new woodlands
- Skills shortages in forestry
- Productivity in the forestry sector
- Timber production, manufacturing and sustainability
- Barriers to increasing the health and well-being benefits of woodlands, forests and trees
- Lack of investment in recreation and tourism facilities due to budget constraints

4.8   The vision in the draft strategy is to "*increase the value and benefit of Moray's woodlands; to support economic growth, improve biodiversity and our climate response and provide opportunities to boost health and well-being*." The objectives are to;

- Increase new multi benefit woodlands in Moray- spatial guidance is provided indicating Preferred, Potential, Potential with Sensitivities, Unsuitable and Sensitive areas for new woodland creation across Moray. Six broad landscape areas have been defined across Moray to provide more specific locational guidance on woodland creation and other related opportunities.

- Optimise the economic potential of Moray's woodlands- loss of productive woodland may occur through progressive forest restructuring and potential future large scale development such as wind farms, roads construction and electricity transmission projects. The Strategy also seeks to increase forestry-related education and skills and boost employment in the industry. Increase the use of local timber in processing and construction and grow the number of sustainable timber processing and manufacturing businesses in Moray. Increase the number of tourist visitors to Moray's woodlands and forests.

- Improve the health and vitality of Moray's woodland ecosystems- protect important woodland habitats and species, help the recovery of nature by connecting and increasing biodiverse woodlands, improve the resilience of woodlands to climate change.

- Foster greater connection between Moray's communities and woodlands- promote the use of woodlands to improve health and well- being, promote the start to finish forestry related economy of Moray, encourage urban planting and the creation of woodlands close to settlements, expand Morays' network of woodland based leisure and recreation infrastructure.

4.9   A Delivery Plan is included within the draft Strategy with a range of actions identified to deliver the objectives. The Delivery Plan requires further work and input from partners during the formal consultation period. Some of the actions will require funding through a strategic approach and these opportunities will be further investigated.

4.10 It is proposed that the draft Strategy is made available for formal consultation for a period of 12 weeks and responses are reported back to a future meeting of the Planning and Regulatory Services Committee. The Council will work with partners to engage with communities and land- based industries to raise awareness of the draft Strategy and encourage participation.

4.11 During the consultation period, Scottish Forestry have offered to provide a "tour and talk" for members, including a visit to one of Moray's sawmills.

5   SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))
The draft Strategy identifies the wide ranging benefits which Moray's woodlands and forests bring and in doing so support the Corporate Plan objectives relating to economic, social and environmental, outcomes.

(b) Policy and Legal
Preparation of a Woodland and Forestry Strategy is a statutory requirement.

(c) Financial implications

The cost of the Strategy was split evenly between Scottish Forestry, HIE and the Council, with each partner contributing £15,000.

The Council's contribution was met from the local development plan revenue budget.

The final version of the Strategy will include a detailed Delivery Plan, which will set out the role of partners and funding opportunities.

(d) Risk Implications
There is a risk if the Council had not progressed the draft Strategy then this would be flagged as evidence missing from the Local Development Plan Evidence Report.

There is also a risk that the economic, social and environmental benefits and opportunities are not recognised and realised.

(e) Staffing Implications
None at this stage.

(f) Property
The Council owns areas of current woodland and other land covered by the Strategy.

(g) Equalities/Socio Economic Impact
None.

(h) Climate Change and Biodiversity Impacts
Woodland in Moray sequesters approximately 869,000 tonnes of carbon per annum. Climate change is a factor in the increased incidence of tree diseases and changing weather with increased extreme weather events. Over grazing of woodland, erosion of peatland and a lack of diverse vegetative succession can increase the risk of wildfire. Decarbonising the forestry industry is a key challenge for future.

The biodiversity benefits and opportunities have been highlighted in this report.

(i) Consultations
The Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Chief Financial Officer, the Democratic Services Manager, the Principal Climate Change Officer, the Transportation Manager, the Environmental Protection Manager and the Equalities Officer have been consulted and comments received have been incorporated into the report.

5. CONCLUSION

5.1 The Moray Woodland and Forestry Strategy has been reviewed and it is proposed that the draft is subject to 12 weeks public consultation. The draft strategy recognises the significant economic, social and environmental benefits and opportunities associated with the Moray's woodlands and forests.

5.2 A draft Delivery Plan is included which will be further developed during the consultation period.

Author of Report: Gary Templeton, Strategic Planning and Development Manager

Background Papers:
Ref: SPMAN-813460984-496

Moray Woodland and Forestry Strategy 2024

Contents

Page 358

1 Introduction

1.1   Moray's woodlands and forests

34%
woodland cover
in Moray

**Moray is one of the most wooded regions in Scotland with 34% of the area covered with woodland.
This compares with the national average of 19% woodland cover in Scotland.**

Woodlands and forests form an integral part of the high-quality environment of Moray valued by residents and visitors and are important to the health and well-being of communities. They are also vital in helping to reduce the effects of climate change and in their contribution to biodiversity.

Woodlands and forests in Moray also form part of a mature and well-developed economic forestry sector with a range of related businesses spanning the full forest life cycle. This encompasses the planning of new woodlands, nursery growing of young trees, management of maturing woodlands, harvesting, transportation, sawmilling and the manufacture and end-use of timber products. Forestry forms a key part of Moray's economy generating £39 million annually and providing direct employment for almost 1000 people.

1.2   The purpose of the strategy

The purpose of the strategy is to help deliver Scotland's transition to a net-zero future and the Scottish Government's commitments on:

▶ **Sustainable development and economic growth**
Moray's productive forests form a significant part of the local economy supporting jobs in nursery growing, forest management, timber manufacture and tourism. This strategy explores ways of increasing sustainable growth in forestry-related industries in Moray.

▶ **Mitigating the global climate emergency**
Moray's extensive woodland and forest cover already plays an important role in mitigating and adapting to climate change by storing carbon. Expansion of woodland will further contribute to meeting national woodland creation targets and to enhancing the production of a sustainable substitute for carbon intensive building materials.

▶ **Reversing biodiversity loss**
Moray's woodlands are important for their biodiversity value. Expansion of well-placed and managed woodlands, creating connective habitat networks and the enhancement of existing woodlands will help to reverse biodiversity loss.

▶ **Increasing community health and well-being**
Some of Moray's woodlands lie close to settlements and are well-used by local residents, contributing to their health and well-being and the quality of their living environment. Exploring ways of increasing people's use of the woodland and forest resource to improve health and well-being is one of the key objectives of this strategy.

The strategy will assist in realising the more detailed objectives set out in *Scotland's Forestry Strategy 2019–2029* and accords with the guidance set out in *Right Tree in the Right Place – Planning for Forestry and Woodlands 2010*. It will contribute to the Moray Local Outcome Improvement Plan of a growing and sustainable economy and will also help inform the Moray Regional Spatial Strategy.

The strategy will be principally used by landowners and managers, Scottish Forestry, Moray Council and stakeholders when considering woodland creation schemes, felling applications and Long-Term Forest Plans. It will also be of interest for communities as it provides information on the types of woodland creation and management envisioned for Moray and considers a range of initiatives, for example improving skills in forestry and related industries and increasing people's use of woodlands and forests.

Page 361

1.3 The 2018 Moray Woodland and Forestry Strategy

Moray Council produced a Woodland and Forestry Strategy in 2018. This 2024 revised strategy refreshes the 2018 strategy and further updates and develops objectives, considering the delivery of initiatives set out in this earlier work in more detail.

A small increase in woodland cover has occurred in Moray since 2018 and progress has also been made on some of the recreational aspirations set out in the 2018 strategy.

This updated strategy has been developed by a partnership comprising Moray Council, Scottish Forestry and Highlands and Islands Enterprise. Where the term 'we' is used to describe the actions set out in the strategy, this relates to this partnership.

A wide-reaching consultation exercise has been undertaken, garnering the views of landowners and managers, representatives from forestry-related industries and member organisations, people involved with education and training, tourism and recreation and community groups managing and using woodlands and forests.

Page 362

1.4 The Local Development Plan and related council strategies

This strategy will form part of the Moray Local Development Plan and the Regional Spatial Strategy.

There are a number of related Moray Council strategies which provide useful background to this strategy. These include the *Moray Climate Change Strategy 2020–2030*, the *Natural Capital Investment and Carbon Offsetting Study* (2023) and the *Moray Economic Strategy* (2022). Other relevant Council documents are referenced within the detailed guidance set out in this strategy.

1.5 Woodland and Forestry Strategies in adjoining authorities

Woodland and Forestry Strategies are in place for the Cairngorms National Park, Aberdeenshire and Highland Councils which border Moray.

These strategies have been considered in relation to potential cross-boundary initiatives on woodland creation and enhancement where relevant.

Page 363

2 Woodlands and Forestry in Moray

This section of the strategy describes the character of existing woodlands and forests in Moray, the range of industries they support, their contribution to biodiversity and the landscape character and health and well-being benefits associated with them.

2.1   Existing woodlands and forests

Existing woodlands and forests cover over a third of the land area of Moray. They comprise a diverse mix of productive and native woodlands which make a strong contribution to biodiversity and to the distinctiveness of the landscape.

Existing woodlands and forests in Moray and their broad species composition are shown on Map 1 with the species breakdown in area shown below.

Woodland type

81%
51,648 ha
of **confiers**

17%
10,628 ha
of **broadleaves**

2%
1,327 ha
of **mixed**
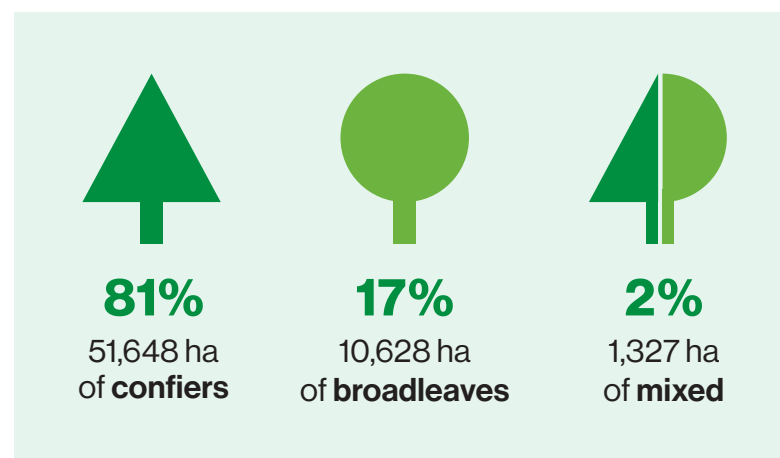
Extensive productive Scots pine dominated forests cover the **western part of Moray**. Many of these woodlands lie within the estates of Moray, Altyre and Logie which are located close to the Findhorn valley. These woodlands are largely managed under continuous cover whereby trees are managed on long retentions with regular thinning and regeneration by natural processes. This management method increases biodiversity value as a varied ground flora and diverse age class of trees is established. Woodlands of national value for their nature conservation interest are present within the Findhorn valley and within the Darnaway and Lethen Forest area.

Forestry and Land Scotland (FLS) owned productive forests are present along the **Moray Coast**. These largely comprise Scots and Corsican pine. Culbin Forest is the largest of the coastal forests, extending westwards into Highland Council area.

Page 365

Map 1 **Woodland cover**
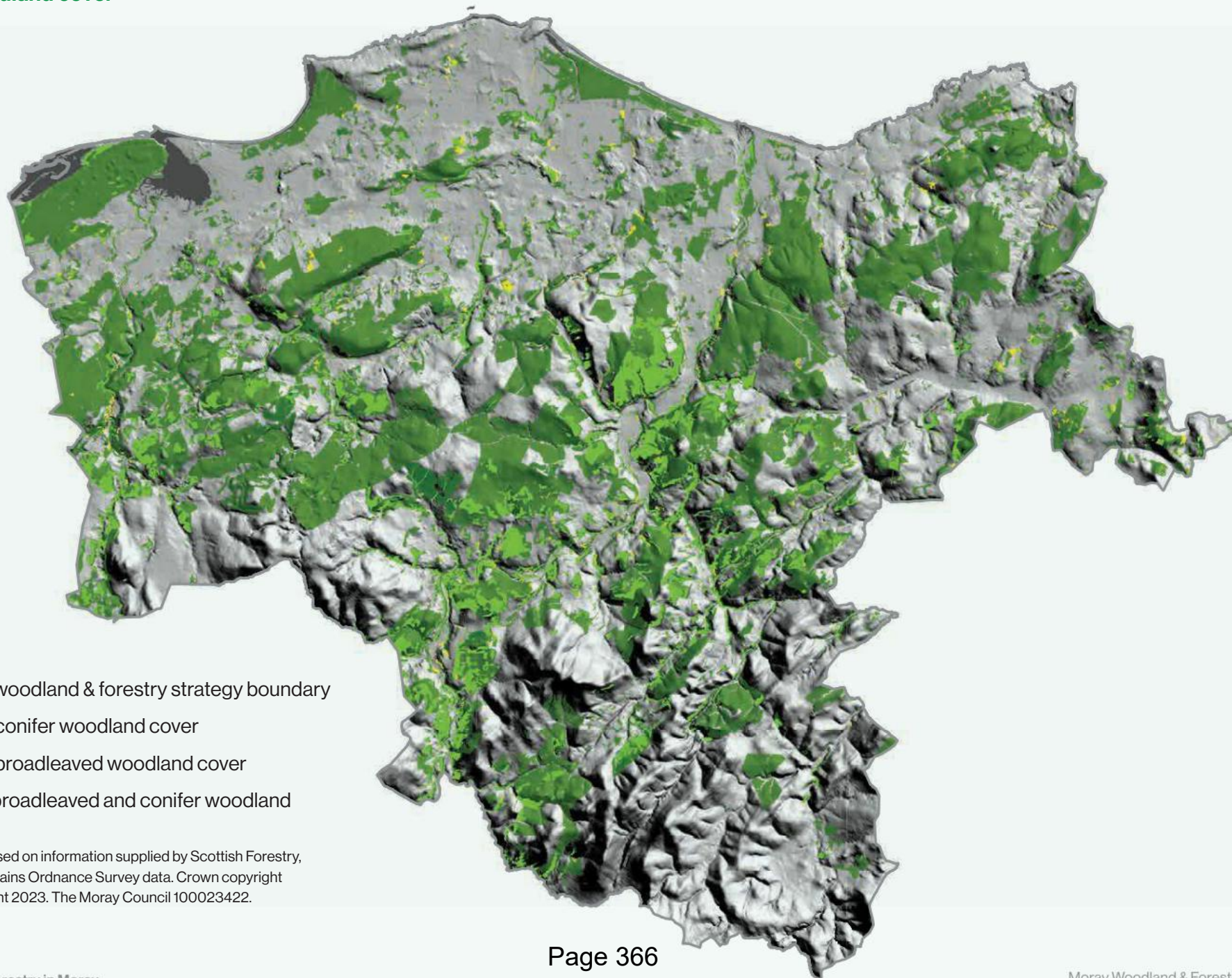
Legend:
- ☐ Moray woodland & forestry strategy boundary
- ■ Mainly conifer woodland cover
- ■ Mainly broadleaved woodland cover
- ■ Mixed broadleaved and conifer woodland

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Page 366

Extensive productive woodlands are located on the ridges containing the **Pluscarden and upper Lossie valleys**. These woodlands are principally owned by private estates and FLS and they comprise a greater mix of conifers than found in the productive forests of western Moray including stands of Sitka spruce and Douglas fir.

This forest was planted from the 1920s onwards to stabilise sand dunes and prevent damage to adjacent farmland. Culbin Forest is nationally important, in part because of its rich ecosystem of lichens and other plants. Moray's coastal forests are popular for recreation with promoted facilities for walking and cycling and their proximity to attractive sandy beaches, an unusual and winning combination for attracting visitors such as at Roseisle Forest. Continuous cover management is undertaken for many FLS forests in this area and elsewhere across Moray.

Page 367

Productive Sitka spruce and pine forests are located on the **eastern side of the lower Spey valley** and include the FLS owned Whiteash Hill Wood, Ben Aigan and Wood of Ordiequish. Whiteash and Ordiequish Forests accommodate the popular Moray Monster Trails for mountain biking.

Similarly extensive forests are located on the uplands lying to the **west of the Spey valley** and these predominantly comprise Sitka spruce and are principally managed for timber production. These forests have few promoted recreational facilities and are relatively hidden from roads and settlement.

A mix of native broadleaves and coniferous plantations are associated with the **Spey and Deveron valleys**. Many of these woodlands comprise estate policies, such as those associated with Ballindalloch and Gordon Castles on the Spey. Woodlands valued nationally for their nature conservation interest include those within lower Strathavon and the lower Spey valley.

Eastern Moray is generally less extensively wooded than the west of the region although productive forests owned by FLS are located on low hills in the Aultmore, Hill of Towie, Bin of Cullen and Meikle Balloch areas.

Smaller coniferous woodlands are located on **farmland across Moray**. These include coniferous shelterwoods in the upper Deveron valley, Glen Rinnes and Glenlivet. Mixed woodlands are also present on the farmed coastal plain with some of these comprising policies, such as those associated with the Westfield and Pitgaveny estates.

Page 369

Woodlands lying close to settlements form part of the attractive natural setting of towns such as Forres, Dufftown, Elgin and Fochabers and they provide health and well-being benefits for residents. These woodlands commonly comprise former estate policies and feature a mix of trees, areas of semi-natural woodland or plantation woodlands of Scots pine.

Some woodlands close to settlements are community owned and/or managed. Mature trees are also an important feature within many urban areas and these include trees in public parks and private gardens as well as street trees.

The ownership of Moray's forests is shown on Map 2 with the area breakdown set out in the graphic below. This excludes woodlands owned by Moray Council which comprise approximately 285 hectares and therefore a small percentage of overall cover.

Woodland ownership

Private/community	Forestry and Land Scotland
40,186 ha	23,418 ha
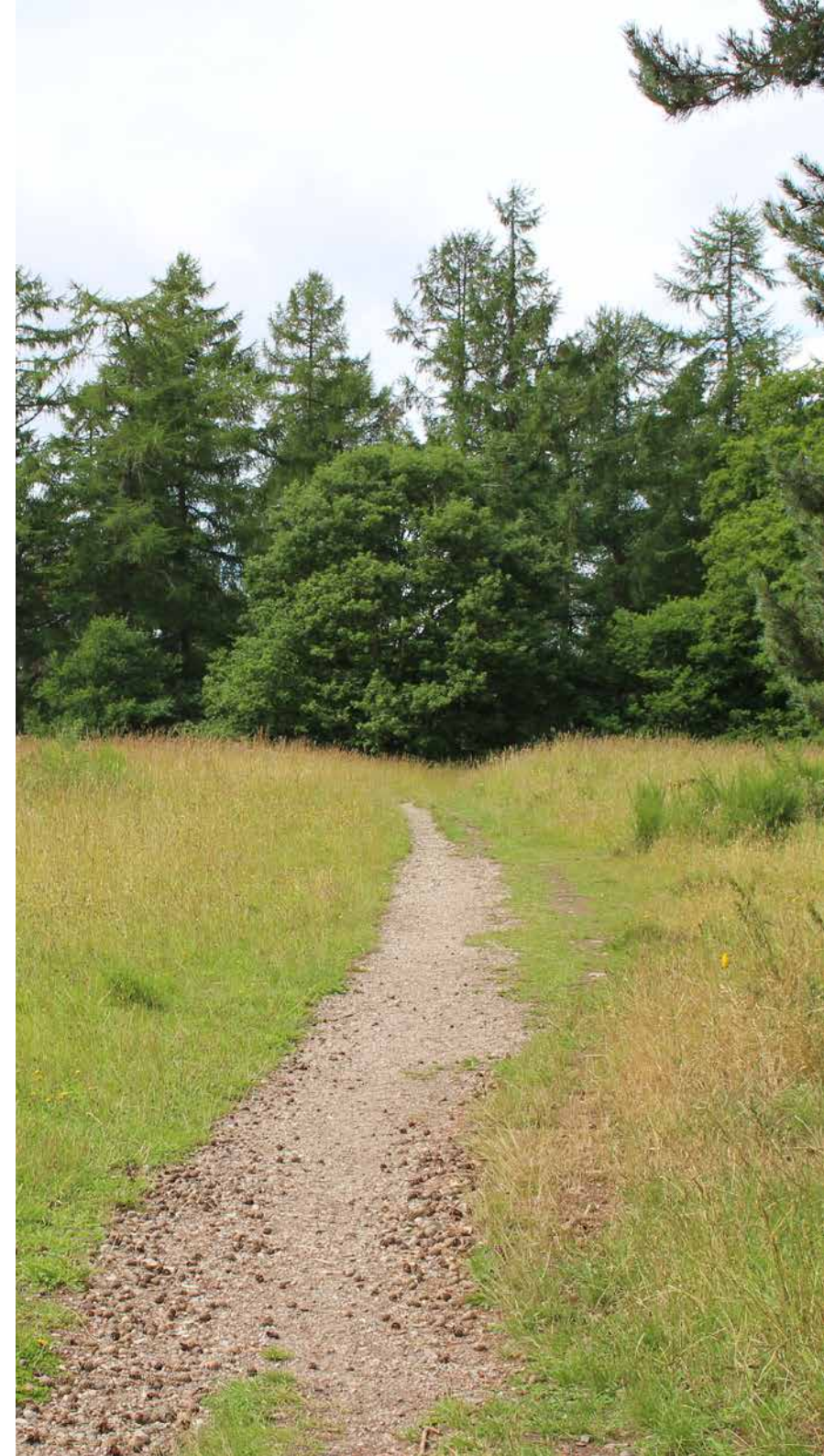
Map 2 **Woodland ownership**
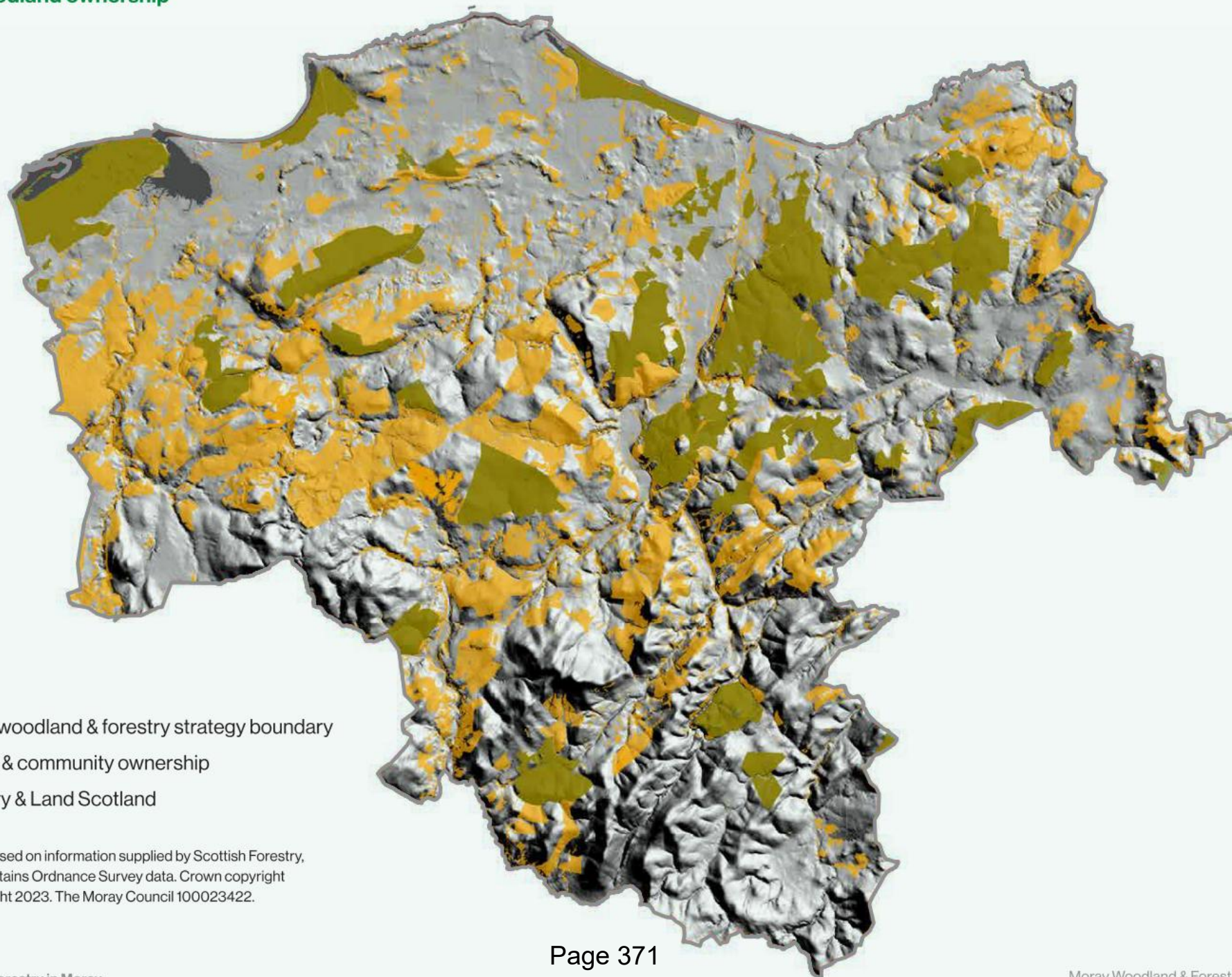
Moray woodland & forestry strategy boundary

Private & community ownership

Forestry & Land Scotland

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Page 371

2.2 The economic benefits of forestry in Moray

1000

**people are employed
in forestry in Moray**

Forestry is an important source of comparative advantage for the Moray economy generating more than £39 million per year and providing direct employment for almost 1000 people.

Forestry in Moray is a mature sector of the economy comprised of the following inter-linked areas of activity:

Primary forestry and timber extraction

Processing of timber and manufacturing of woodland based products

Services provided to support forest operations

Tourism-related activity based around visits to Moray's forests and woodlands

The primary source of data on employment for different sectors of the Scottish Economy is the Business Register and Employment Survey (BRES) published by the Office for National Statistics (ONS). According to the 2023 survey around 350 people were employed in primary forestry and logging related activities in Moray in 2021 and a further 460 people were employed in wood related manufacturing jobs (including around 10 in jobs related to the manufacture of forest and agricultural machinery).

Together these jobs account for around 2% of all employment in the region; however this is likely to be an underestimate of the true importance of the sector to the region's economy because the BRES does not provide a breakdown of important components of the sector such as haulage, tourism and public administration. Estimates for these components of the sector were therefore derived independently from other sources to provide a more complete picture as follows:

Timber Haulage

Research published by the Scottish Government in 2015[1] suggested that around 810 people were employed in timber haulage across Scotland. Since then, deliveries of green timber across the UK[2] have increased by around 8%. It is reasonable to assume that employment in timber haulage has increased proportionately. Moray accounts for approximately 4% of total forest cover in Scotland so assuming haulage related employment is proportionate to this it can be estimated that around 40 people may be directly employed in this sub-sector in the region.

1   Economic contribution of the forestry sector in Scotland (September 2015), CJC Consulting.
2   Forest Research (2022), Forestry Statistics 2022, chapter 2.

Page 372

Tourism

Almost

400K

estimated visitors to Moray per year

According to research undertaken by NatureScot[3] (then Scottish Natural Heritage), 360,000 people visited Moray forests and woodlands in 2010. Assuming an increase in visitor numbers of 5% every five years [4], it was estimated that this figure could now be around 393,900 visits per year.

Forests and woodlands attract a variety of visitors, including residents who visit daily or frequently, day visitors to Moray and those who are spending an extended period of time in the region. Nature and scenery are a draw for many tourists to Scotland and it is reasonable to assume that the forest environment is an important part of this.

Based on work undertaken by Forest Research [5], 67% of forest visits are made by day visitors and 33% by people staying overnight as part of their trip. The spending characteristics of day and overnight visitors differ, with overnight visitors typically spending more per day due to accommodation costs.

Data published by VisitScotland indicates that day visitors in Scotland spend an average of £31 per day, whilst overnight visitors typically spend £42 per day. Applying these estimates to the projected proportion of day and overnight visitors to Moray forestry estate it was estimated that the spending generated in the sustainable tourism sector by these visitors directly supports around 90 jobs.

Public Administration

According to the Scottish Government approximately 40% of Scotland's forest estate is owned by the state[6]. The management of this estate provides direct employment for foresters and other land management professionals. Scotland also has a well-established system of support for private forestry operations and the administration of this system provides additional employment. None of these jobs will be included in the forestry and logging employment captured by the BRES.

Responsibility for managing Scotland's forest estate rests with FLS while responsibility for forestry policy and support lies with Scottish Forestry. Data on the number of people employed by these organisations was provided as part of the research under-taken to inform this strategy. It suggests that taken together the two organisations employ around 50 people in Moray.

3   Scottish Natural Heritage (2010), Assessing the Economic Impacts of Nature Based Tourism in Scotland.
4   Based on the increase in visits made to all forests in Scotland over a five year period from research published by Forest Research in 2018.
5   https://www.forestresearch.gov.uk/tools-and-resources/statistics/forestry-statistics/forestry-statistics-2018/recreation-3/visits-to-woodland-on-site-surveys/scotland-all-forests-surveys/
6   https://www.gov.scot/publications/woodland-ownership-key-data/

## 2.2.2 Total forestry related employment in Moray

Taken together the total employment of the sub-sectors considered in this section amounts to nearly 1,000 people across Moray, or around 2.5% of the total labour force. In relative terms, Moray's forestry sector employs around a third of the number employed in the food and drink manufacturing sector (often considered one of Moray's most important sectors).

However, while forestry may not be as large as the food and drink manufacturing sector, it is particularly concentrated in Moray. The region accounts for around 6% of all forestry and logging related employment across Scotland, making the sector five times more concentrated than the Scottish average [7]. Concentrations of economic activity are an important indicator of comparative advantage so this suggests forestry is an important strength for the Moray region. A breakdown of this employment is below.

Forestry & logging

350 jobs / 55 businesses
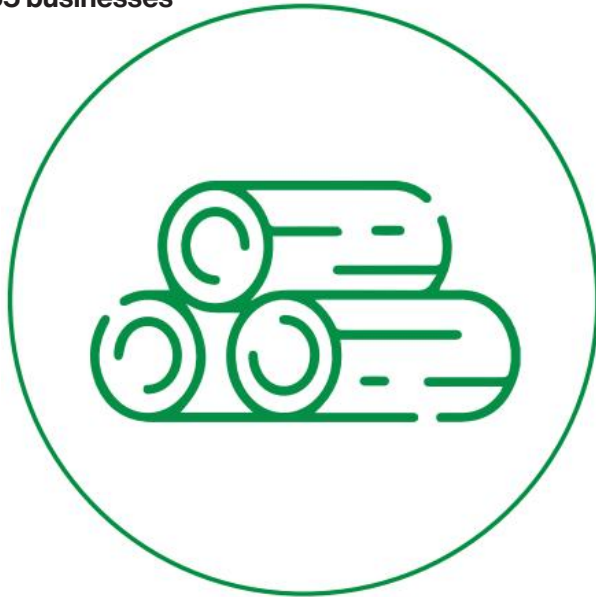
Manufacture of wood & wood products

450 jobs / 35 businesses
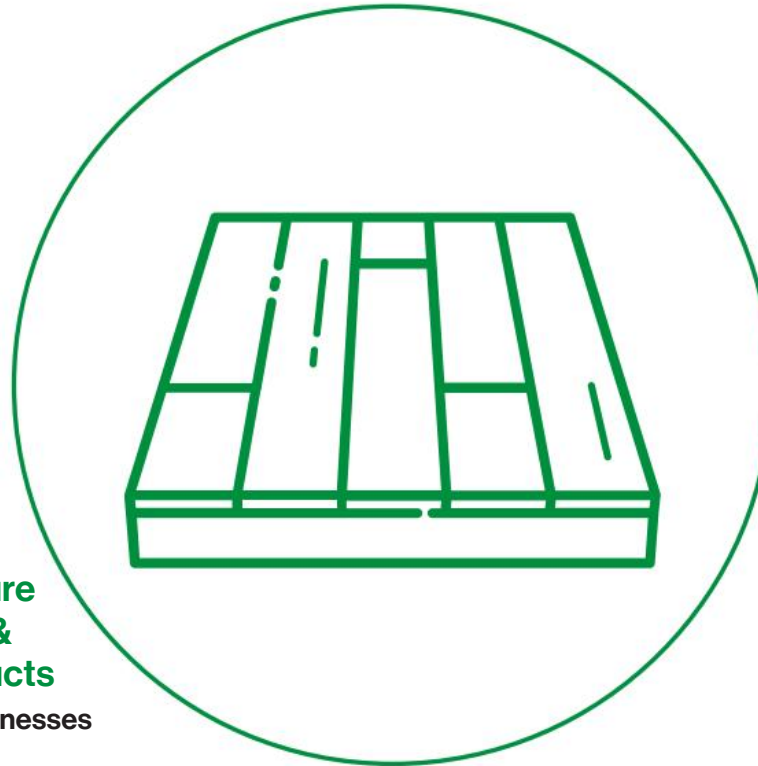
Tourism***

90 jobs

Public administration**

50 jobs

Timber haulage*

40 jobs

Manufacture of forestry & agricultural machinery

10 jobs / 5 businesses

Source: ONS (2023), Business Register and Employment Survey. ONS (2023), UK Business Counts. *Based on estimate of timber haulage employment in Scotland produced for the Scottish Government.
Estimate based on data provided by Forestry and Land Scotland. * Based on estimated number of visitors and associated spend in the region.

7   Skills Development Scotland (March 2022), Regional Skills Assessment, Moray Growth Deal.

Page 374

2.2.3 Productivity and the value of forestry to Moray's economy

The forestry sector contributed around £39 million to the economy in 2022

In considering the economic contribution of any sector it is important to look at productivity levels because this is the main determinant of economic growth rates over the long-term. Productivity levels, measured as Gross Value Added (GVA), for each of the sub-sectors within the forestry sector are presented in table below. Productivity across the sector is similar to the Moray average (which is overall below the Scottish average). However, there are significant variations between sub-sectors with productivity levels in forestry and timber extraction and wood-based manufacturing, for example, 6% and 10% higher than the regional average.

The total value the forestry sector adds to Moray's economy can be estimated by multiplying the average GVA/worker in each of the sub-sectors listed above by the number of people working in each sub-sector. Using this approach, it was estimated that the sector contributed around £39 million to Moray's economy in 2022. This represents around 2% of the total value added by Moray's economy. This estimate excludes the value added by public sector administration and the indirect effects associated with the forestry related supply chain so should be considered conservative.

Productivity by sub-sector (GVA per job)

Manufacture of forestry & agricultural machinery
£58,612

Forestry & timber extraction
£44,131

Manufacture of wood & wood products
£45,806
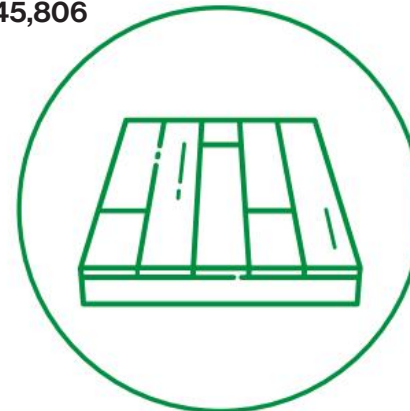
Timber haulage
£32,406

Tourism
£14,533

Forestry sector average
£41,774

Moray average
£41,491

Source: Scottish Annual Business Statistics and ONS sub-regional productivity estimates for 2023.

Page 375

2.2.3 Major employers in the industry

90

Moray forestry and timber processing businesses

Moray is home to 90 forestry and timber processing businesses of which 80 are micro-sized businesses with up to 9 staff, 10 are small businesses with up to 49 staff and 5 are medium-sized businesses with up to 250 staff.

Some important forestry employers in the region include:

▶ **James Jones and Sons Ltd** – a national company operating at Mosstodloch and Forres, providing a range of products including fencing, pallets and construction timber for local and national markets. The company currently employs around 170 people between the two sites in Moray.

▶ **Logie Timber Ltd** – a local timber business established in 2017 and currently with 10 employees. They embarked on a £1.2m expansion in 2021 with the intention of creating jobs and reducing the company's carbon footprint.

▶ **Newton Nursery** – the nursery produces around seven million trees each year, equivalent to around 8% of FLS's 25 million annual requirement. It employs 12 full-time staff and has 13 agency staff who are employed at busy times of the year.

▶ **Christie-Elite and Christies (Fochabers) Ltd** – these are two of the UK's six largest tree nurseries, together producing around half of all trees grown in the UK each year. These nurseries collectively employ around 140 people in Moray.

▶ **Robertson Timber Engineering** – based in Elgin, this company is involved with the design, manufacture and construction of off-site engineered timber frame structures for buildings.

▶ **Forres Tree Services Ltd** – a forestry and arboriculture services company operating across Moray, Highlands and Aberdeenshire since 2010. As of 2021, the company employs six people.

▶ **Moray Estates** – the estate owns and manages around 4,050 hectares of commercial and amenity forest and mills with timber processed by local businesses to create boards and fencing materials.

The region plays an important role in underpinning the wider UK forestry and associated timber construction sectors. It is home to a well-established arboriculture sector that incorporates some of the UK's largest tree nurseries as well as some thriving and innovative timber engineering operations which make an important contribution to the construction sector.

Nursery growing in Moray

Moray's drier weather, sunshine and fertile soils have attracted the establishment of many tree nurseries including Christies (Fochabers) Ltd and Newton nurseries.

Christies (Fochabers) Ltd nursery was established in the 1820s, originally as a market garden with a connection to the Gordon Estate but specialised in growing trees from around 1835. They are the oldest tree nursery in Moray and own and lease 400 acres of land for outdoor growing near Buckie. The company buys seed from Forest Start in Shropshire and produce around 22 million barerooted trees (around 20% broadleaves and 80% conifers) per annum. They employ 55 full time and 20 or so part time/seasonal workers at the nursery. They have recently developed and invested in a fully automated tree grading system which has created safer and more comfortable working conditions for staff and increased efficiency given the greater demand for nursery stock. The company is a major supplier of trees to Scottish Woodlands and other forestry companies as well as to FLS.

Newton nursery was established in 1931 by the Forestry Commission and continues to be run by FLS. They largely grow conifers with seed harvested from stock trees on the nursery and currently field grown. They presently provide 7 million of the 24 million trees required annually by FLS for woodland expansion and restocking post harvesting. In 2022 they secured £19 million investment from the Scottish Government to redevelop and expand the current site at Newton, east of Elgin, and to improve efficiency and productivity. This will involve the leasing of additional land and construction of a one-hectare glasshouse for under-cover production, new offices and other facilities due to be completed by early 2025. It is intended to gradually increase production to 16 million trees annually.


Page 377

James Jones & Sons Ltd

James Jones & Sons Ltd is a Scottish based family run business established approximately 180 years ago. The company has its origins in sawmilling with its services expanding to include timber harvesting and haulage as well as manufacturing.

The company has sought to innovate and lead in areas such as UK Woodland Assurance Standard planting and forest management, timber harvesting and processing methodologies, modern timber haulage techniques, kiln-drying and biomass heating.

In Moray, the company purchased Mosstodloch Mill in 1989 and has recently extended the facility. The site currently employs 73 full time staff and produces a range of products with the agricultural fencing sector being significant. There are a number of added value operations on site, including a direct retail facility for local wood users. The Timber Systems division in Forres was established in 1998 to manufacture JJI–Joists. This was the first UK based manufacturing facility producing engineered timber products for the UK's housing market and JJI-Joists market share of the new-build flooring market is estimated at around 45%. In 2022 they secured funding from HIE to help build a new timber manufacturing and processing facility next to the existing one at Forres which is projected to create 19 new jobs. On-going research and development by the company seeks to open new markets for home-grown timber products.

Page 378
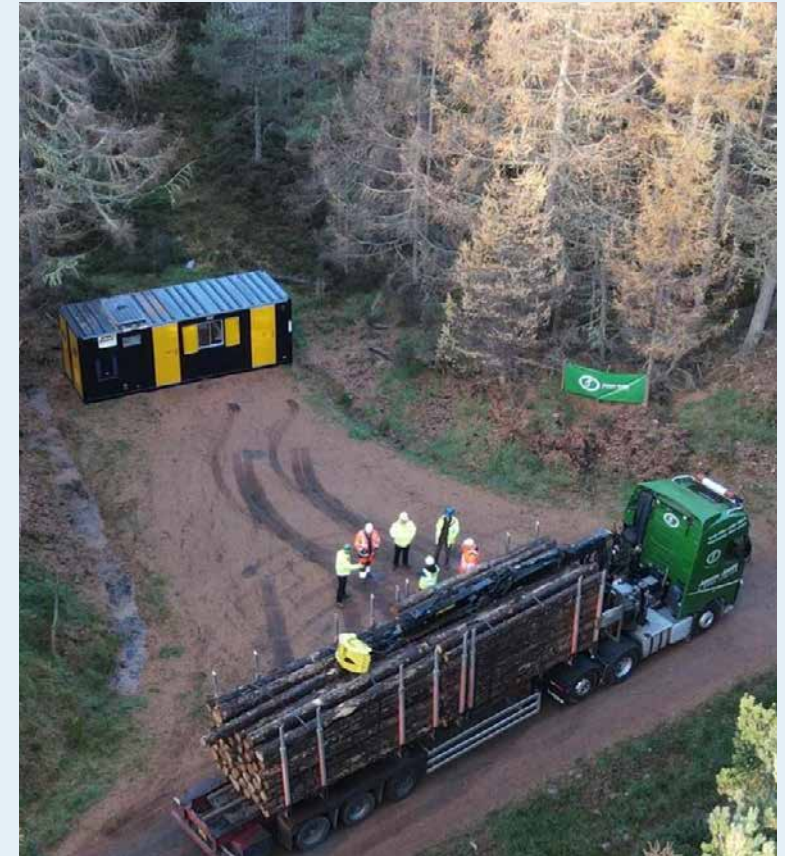
Logie sawmill

Logie Timber is located at Dunphail near Forres on the Logie Estate and specialises in milling local hardwoods and softwoods. There is a strong local customer base for a diverse range of products including cladding, decking, various structural timbers and bespoke joinery hardwoods.

Value is added through kiln drying, planing and sanding. The sawmill employs ten skilled people with the emphasis on quality and milling to customer requirements rather than high output. For many joinery timber products the story and origin of the tree are important in adding value.

Timber is sourced as locally as possible with larch being a significant element used in the construction sector. An increase in the use of Scots pine is likely as the availability of larch is anticipated to decline due to the impact of *Phytophthora ramorum.*

A new sawline, which is housed in the shed built using the sawmill's output, has recently been installed with the daily output of sawn timber expected to rise to 15 cubic metres. Future market diversification includes looking to create Scottish home-grown solid wood flooring and possibly teaming up with a joinery company to develop modular timber framed sheds to rival steel buildings.

The company has been successful in recruiting and retaining a skilled workforce but feels that the lack of any formal training opportunities in relation to milling is an industry weakness. The largest current constraint to business expansion is the presumption in favour of imported timber due to price, but also the variable quality and small volumes of home-grown timber.

Page 379

2.3   Health and well-being related to woodlands and forests

The majority of Moray's woodlands and forests accommodate tracks and paths for cycling and walking. Some of the most popular woodlands for recreation include:

- ▶ The **Moray Monster Trails** for mountain bikes based in Whiteash and Ordiequish Woods. These trails feature a range of different grades of trail bike routes suitable for beginners through to experts.
- ▶ **Culbin Forest** and **Roseisle Forests**, the most popular of Moray's coastal forests, which both feature an extensive network of tracks and paths and other visitor facilities.
- ▶ **Quarrel Wood** which is local to Elgin and comprises stands of ancient oak woodland as well as conifer species, a network of paths and a sculpture trail.
- ▶ **Millbuies Country Park** which features mature stands of mixed policy woodland focused on a former fishery lake.
- ▶ **Altyre Estate woodlands** a hidden gem comprising mature mixed policy woodlands and lake but increasingly well-used by residents within the expanding settlement of Forres.

- ▶ **Torrieston Wood** which offers a network of steep paths through mature forest with tall Douglas fir and views over the Pluscarden valley to the abbey.
- ▶ **Sanquhar Woods** close to Forres which is community owned and managed and includes a network of paths and cycle courses.
- ▶ **Drummuir Woodlands** which provides a valuable recreational and educational resource including an all-abilities trail which allows a variety of people to enjoy the trees. One of the oldest community managed woodlands in Moray lies between the station and village.
- ▶ **Findhorn valley woodlands** with low-key extensive paths through scenic mixed woodlands on the Logie and Darnaway Estates.

Long-distance trails used by walkers and cyclists are an important feature of Moray's recreational resource and include the Dava Way, Moray Coast Trail and the Speyside Way. Long sections of these routes are aligned within and close to woodland. The Moray Way combines the major parts of these routes and is a promoted 100-mile long circular recreational route. Gravel biking commonly uses tracks constructed for

forest management and the extensive productive forests in Moray offer a tremendous resource for cyclists. ACE Adventures offer forest-based activities and accommodation near the Findhorn valley.

Map 3 shows existing recreational facilities and long-distance trails located within and close to woodlands in Moray.

Page 380

Map 3 **Principal woodland based recreational facilities**

Legend:
- **Peaks** (green dot)
- **Settlements** (magenta dot)
- **Long distance paths** (blue dashed line)
- **Moray woodland & forestry strategy boundary** (green outline)
- **Cairngorms National Park** (yellow outline)
- **Exisiting woodland** (green fill)

1. Culbin and Roseisle Forests
2. Millbuies Country Park
3. The Moray Monster Trails in Whiteash and Ordiequish Woods
4. Bin of Cullen and Meikle Balloch
5. Ben Aigan
6. Quarrelwood
7. Torrieston Wood
8. Altyre Estate woodlands
9. Sanquhar Woods
10. Findhorn valley woolands

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There are a number of community owned/managed woodlands in Moray. These include groups managing woodlands around Findhorn, Drummuir, Forres and Enzie Crossroads east of Fochabers. There are also charities including Wild Things who provide opportunities for environmental education and engagement with woodlands and forests and Outfit Moray, a charity and social enterprise organisation delivering outdoor learning and adventure activities for young people. Earthtime Forest School is accredited by the Forest School Association and has nursery sites on the Duffus Estate and at Cooper Park in Elgin while Stramash Outdoor Nurseries have a site close to Quarrel Wood.

Friends and volunteer groups across Moray organise events such as tree planting sessions, open days and nature walks which enable people to interact with woodlands.

Health and well-being benefits are not just associated with woodlands and forests but also with individual and small groups of trees within Moray's urban areas where they enrich the character of settlements, provide habitat for wildlife and improve the environment for residents. The Scottish Forestry Strategy recognises the important contribution that trees outside of forests and woodlands make to enhancing Scotland's rural and urban landscapes, their role in addressing air pollution, and their biodiversity and cultural value.

Page 382

ACE Adventures

ACE Adventures are based on the Logie Estate in Moray where they lease a house and steading with shared use woodland as their base.

They employ several full and part time staff although the work is very seasonal. They offer some of the best white water rafting in the UK on the River Findhorn as well as other woodland-based activities including canyoning, a tree top high ropes trail, woodland disc golf course and paintballing. They also have a small woodland campsite with space for ten pitches and their own bell tents and shepherd's hut accommodation.

There was an increase in people booking activities with them during the Covid travel restrictions, but this tailed off once foreign travel opened up again. Recently, however, there

have been more international visitors booking activities with the company with people from the US, Netherlands and Belgium being particularly evident. School and adult groups, including scout and well-being support groups for ex-military personnel, use their woodland camping area and participate in adventure activities.

In future they intend to develop programmes for the first responder community, providing year-round accommodation and communication spaces for respite, and also for resilience and leadership training, in a natural setting.

Page 383

Wild Things

Wild Things are a charity set up with the aim of enabling links to the natural world through outdoor education and experiences, improving well-being and resilience.

They provide a range of programmes for different ages of people in natural settings working with vulnerable adults, primary and secondary schools, care home residents and the more active elderly. They also offer accredited training which is equivalent to Forest School and leadership training courses, an introduction to bushcraft courses and the John Muir Award.

Woodlands close to schools are commonly used; some of these are privately owned or comprise community woodlands.

Page 384

Forres Community Woodlands Trust

Forres Community Woodlands Trust is the oldest community group involved with woodland and land management around Forres. They own Sanquhar, Muiry and Newforres woodlands on the fringes of the town. Their woodland landholding extends to 66 hectares including nearly 3 hectares of wildflower meadow.

These woodlands were purchased through the Scottish Land Fund with the group raising match funding. They have 85 members and a board which includes a professional forester. Sanquhar Woodland is the largest woodland in the ownership of the Trust and is particularly well used with an attractive mix of trees and some open ground which is managed as species-rich grassland. This woodland accommodates an extensive network of paths and a mountain bike trail.

The Trust get contractors in to do some of the woodland management work, but volunteers remove invasive species such as rhododendron and laurel and plant trees. They receive no grant funding from Scottish Forestry but are supported by donations and receive an income from felled timber.

Wild Things use Sanquhar Wood for some of their activities and events for schools, such as tree planting, are organised by the Trust.

Page 385
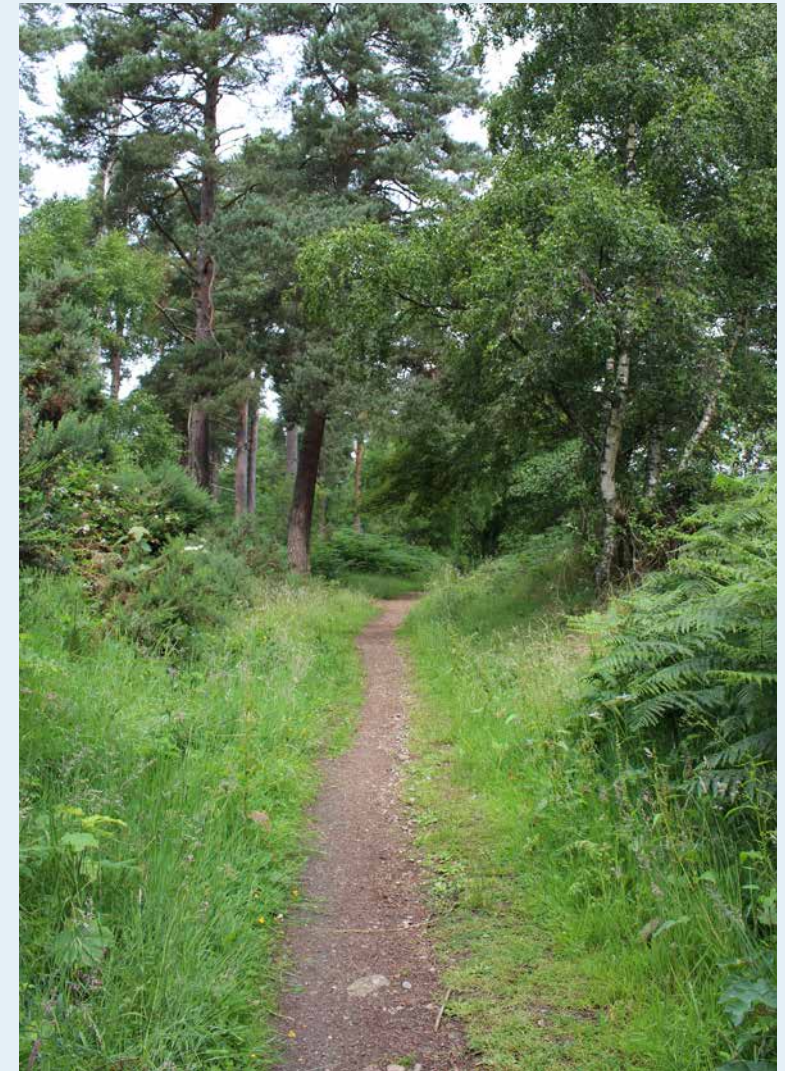
2.5   The environmental benefits of Moray's woodlands and forests

Moray's woodlands and forests provide a wealth of benefits for the environment. They host numerous protected animal species important to the area including red squirrel, black grouse, pine marten, bats, wildcat, goshawk and the Scottish wood ant. Notable plant species include the pearl-bordered fritillary, twinflower and three-nerved sandwort.

Invasive non-native species such as rhododendron, Himalayan balsam and Japanese knotweed are also present in some of Moray's woodlands and riparian corridors. These can outcompete more diverse native flora and result in reduced biodiversity.

Whilst planted productive forests dominate the woodland cover within Moray, these are unusual in comprising extensive areas of Scots pine with many of these plantations managed under continuous cover systems which increase age diversity of the trees and allow ground flora to develop. Semi-natural woodland is scattered throughout the region. It is found in small patches, most often associated with riparian corridors and in fragmented stands within the wider agricultural landscape and upland areas. Priority woodland habitats in the area include Upland Birch, Upland Oak, Upland Mixed Ash, Lowland Mixed Deciduous and Wet Woodlands. Increasing the cover of semi-natural woodlands is challenged by high levels of deer and livestock browsing, reducing the success of natural regeneration.

Many of the woodlands, planted or otherwise, are present within the Ancient Woodland Inventory. These are areas which have been under continuous forestry cover since 1750. As such, even those of plantation origin have developed semi-natural characteristics and have a rich and diverse soil biota and other associated flora and fauna.

Some of Moray's woodlands are considered to be of national and international importance for their biodiversity and are designated features of the following protected areas:

▶ Bochel Woodland SSSI

▶ Culbin Sands, Forest and Findhorn Bay SSSI

▶ Kellas Oakwood SSSI

▶ Lower Findhorn SSSI/SAC

▶ Lower Strath Avon Woodland SSSI

▶ Mill Wood SSSI

▶ Quarry Wood SSSI

As well as biodiversity value, the woodlands and forestry within Moray provide a number of ecosystem services including carbon storage, natural flood defence and improved air quality in towns and cities.

Agroforestry/ Farmed Based Biodiversity Enhancement

Glenshaugh is an upland research farm, run by the James Hutton Institute, in the Grampian foothills. They have a long-term research project investigating the feasibility of silvopastural agroforestry (trees planted at wide spaces with grazed pasture beneath).

The main objectives of the project were related to farm diversification and production; however this type of farming system is also highly beneficial for the environment. Both insects and birds have been found to have greater species diversity and abundance in agroforestry systems compared to standard agricultural systems. This type of habitat is also beneficial to species such as fungi, bats, black grouse and red squirrel. One of the main benefits of wood pasture is that it provides a porous landscape though which both open ground and woodland species can move and provides linkages to both these habitat types.

As well as the biodiversity benefits the project has found benefits to livestock welfare in terms of shelter provision and higher quality pasture. There was no overall loss in livestock (sheep) production and an alternative income source created through timber.

As a demonstration farm there is a self-guided trail which can be visited with information available on the project and management requirements of this type of system.

Page 387

Cabrach Development Trust – Discovery Trail

The Cabrach Development Trust aims to regenerate the Cabrach area, which is situated on the edge of the Cairngorm National Park in Moray, through providing social and economic development opportunities. The area is rich in both natural and cultural heritage, which the Trust seeks to promote.

The Discovery Trail Project involved the planting of 3000 native broadleaved trees in association with the creation of a 2km all abilities walking trail along the River Deveron and Blackwater. The project also incorporated the creation of a wildflower meadow, two nature ponds with dipping platforms, nature hide and interpretation boards. The project was part funded by Woodland Trust, Trees for Life UK and Queen's Green Canopy.

As well as providing a resource for the local community the riparian tree planting will help to stabilise the banks of the water course, reducing erosion and sedimentation downstream and provide shade and reduced water temperatures for fish, increasing resilience to climate change. The planting also helps to connect pockets of ancient and semi-natural riparian woodland which have prevailed along the Deveron.

The Dorenell Ranger Service have hosted guided nature walks on the trails, finding a variety of species including tortoise beetle larvae, hare, dipper and osprey.

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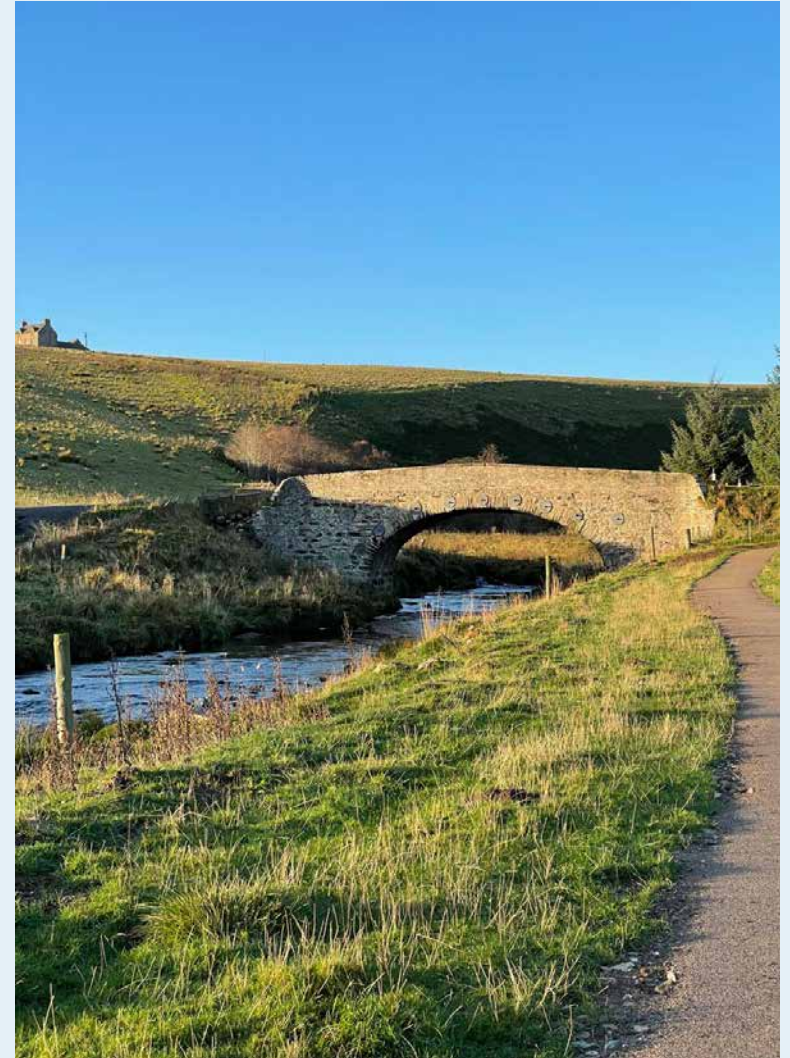
3 Issues needing to be addressed by the strategy

Through our consultation on the strategy, we have identified the following issues and challenges which need to be addressed:

3.1   Climate change

869,000
tonnes of carbon per annum are accumlated by Moray woodlands

Climate change and trees

Woodlands and forests can help mitigate the effects of climate change by assisting carbon sequestration. Woodlands in Moray accumulate approximately 869,000 tonnes of carbon per annum with around 95% of this attributed to conifers and 5% to broadleaved trees.

Woodlands and forests can also help alleviate the effects of more extreme weather events such as flooding. However, climate change is a factor in the increased incidence of tree diseases and changing weather, including extreme weather events, may increase drought, soil erosion and wildfire affecting Moray's woodlands and forests.

Increasing woodland connectivity provides a number of benefits for biodiversity and can increase resilience by allowing species to move in response to environmental change. Conversely enhanced linkages can allow diseases and invasive species to spread, especially where species diversity is limited, and pest and disease effects can result in at least temporary loss or fragmentation of woodland cover.

Fire management is likely to become a more important consideration particularly in the drier east of Scotland. Historic over-grazing of woodland, erosion of peatland and a lack of diverse vegetative succession can increase the risk of wildfire.

Decarbonising the forestry industry

All forestry operations have the potential to emit carbon due to the energy intensive nature of machinery necessary for felling, haulage and processing. Currently the power required to operate harvesting machinery safely in challenging conditions means that options for replacement with electric driven units will require advances in technology. Transport is a significant emitter of carbon at all stages of the forestry cycle and here progress is likely to be more rapid. The use of electric vehicles by forest managers and contractors is increasing and electric vehicles for timber haulage, and the adaption of existing vehicles to hydrogen, are being trialled in Moray. The carbon footprint of forestry is reduced in Moray because of the short transport distances to sawmills and end users although the use of imported timber by some processing industries in Moray will increase carbon emissions.

Page 390

3.2 Threats to existing woodlands and forests

7%

of existing native woodlands were in good condition

Native woodlands

Although existing native woodlands are important for biodiversity, their potential value in this regard is often not optimised. A recent study found that only 7% of existing native woodlands were in good condition [8]. Many existing native woodlands are poorly managed and comprise even-aged trees with little or no regeneration due to heavy grazing by deer and/or livestock. If no intervention is taken, this will lead to the loss of these woodlands in future.

Potential effects of development on woodlands

Consented and future developments such as wind farms may result in the felling of trees and compensatory planting is required to ensure no net loss of woodland. Compensatory planting however only extends to planting the same hectarage lost and does not take into account the loss of biodiversity value which may be considerable if older trees and native woodlands are removed.

Linear developments such as transmission lines and new roads may result in severance of existing woodlands, potentially affecting their connectivity and biodiversity value. National Planning Framework 4 (NPF4) requires stronger enhancement and biodiversity improvement in relation to development proposals. Many large-scale developments confine mitigation and enhancement measures to the application site only without considering wider landscape and biodiversity enhancement.

Potential loss of productive forestry

The progressive effects of restructuring to meet the requirements of the UK Forestry Standard may lead to an erosion of the productive forest area. Rewilding and non-intervention forestry encouraged by the Carbon Code (which can compete for land with conventional productive woodland creation schemes) can also potentially reduce the area of productive forestry.

World-wide consumption of timber is predicted to increase in future and large-scale sawmills competing on an international footing require large volumes of uniform high-quality timber to operate competitively. Any significant erosion of the areas of productive Sitka spruce and Scots pine in Moray could threaten the long-term viability of these businesses as well as increase timber imports with associated increases in carbon through transportation.

8   ICF/CIEEM Position Paper August 2023 Management of Existing UK Woodlands: An Opportunity for Green Prosperity.

Page 391

3.3 Barriers to the creation of new woodlands

In terms of the creation of new woodlands, Scotland has led the way within the UK (and over the past years woodland creation has been at its highest level for a generation). However, government set targets for new woodland creation, and recent reductions in overall funding for planting in Scotland, are challenging.

Woodland creation targets are set out in the Scottish Government's Climate Change Plan. Scotland created just 8190 ha of new woodland in 2022/23 from a target of 15,000 ha. Scottish Forestry approved 11,000 ha of new woodland in 2022 but not all of this has been planted. The new woodland planting targets will increase to 16,500 ha in 23/24 and to 18,000 ha in 24/25. Current figures indicate that 74% of the Scottish native woodland target was met with 2,945 ha being planted in 2022/23.

Traditionally, planting grants covered most establishment costs. Inflation, the shortage of contractors and an increased administration burden for applications have all increased costs significantly while grants, until recently, have largely remained static. Potential private sector carbon funding is unlikely to fill any funding shortfall for productive conifer woodland. Carbon sales are a form of speculation which entails risks and the sale of carbon creates a burden on the land of a very long duration. A 100-year obligation not to thin or manage an area of woodland may impede future management options for landowners. The publicly funded grant system is therefore likely to remain the main policy tool in incentivising landowners to establish new woodlands.

Often, farmers do not know about the availability of grants and/or do not have the time to deal with applications, planting and management. There is also a wider cultural issue associated with the division between farmers and traditional woodland owners in the UK although a younger generation of farmers appears to have a greater appreciation of the importance of woodlands.

Availability of land is also an issue, particularly in Moray where the extent of woodland already present, and the presence of good quality agricultural land, limits the availability of land for new woodland creation. There is also a ready market for barley from the distilleries which means it is often grown on more marginal ground (where new woodland is commonly located in other parts of Scotland) further reducing scope for woodland expansion in Moray.

While the Forestry Grant Scheme has a minimum woodland size of 2 hectares and 15 metre width, the Small or Farm Woodland and Native Broadleaved Grants provide funding for small woodlands under 0.25 ha/15 m width. However, none of these grants fund the planting of hedgerows and field trees (which take up less space on valuable farmland but which can increase biodiversity if planned well) although other sources of potential funding are available.

These include the Agri-Environment Climate Scheme administered by NatureScot/Scottish Government, the Nature Restoration Fund administered by NatureScot and grants awarded by the Woodland Trust. Some consultees commented that the Nature Restoration Fund is geared towards larger scale landholdings and the process tends to favour Non-Government Organisations who have the time and personnel able to put together often complex applications.

3.4 Skills shortages in forestry

Scottish forestry workforce needs to increase by around

72%

Skills shortages are a major concern for the forestry sector across the UK. Evidence published by the Institute of Chartered Foresters (ICF) suggests the Scottish forestry workforce needs to increase by around 72% by 2027 to meet this gap.

The ICF also point to what they describe as a "crisis" in further and higher education in training provision for the sector, noting that there are very few providers offering courses for the sector. Consultees felt that there is a lack of awareness about work opportunities in the sector and the attractiveness of forestry as a career.

While the Scottish School of Forestry, which is based near Inverness, is close to Moray and offers HNC, HND and degree courses, there has been a lack of applicants for some of these courses. There are insufficient school leavers (and older people) being attracted into forestry and forest management and apprenticeship schemes are operated only by a few private estates and FLS. There are also currently no formal training courses in sawmilling with equipment suppliers generally supplying only basic training.

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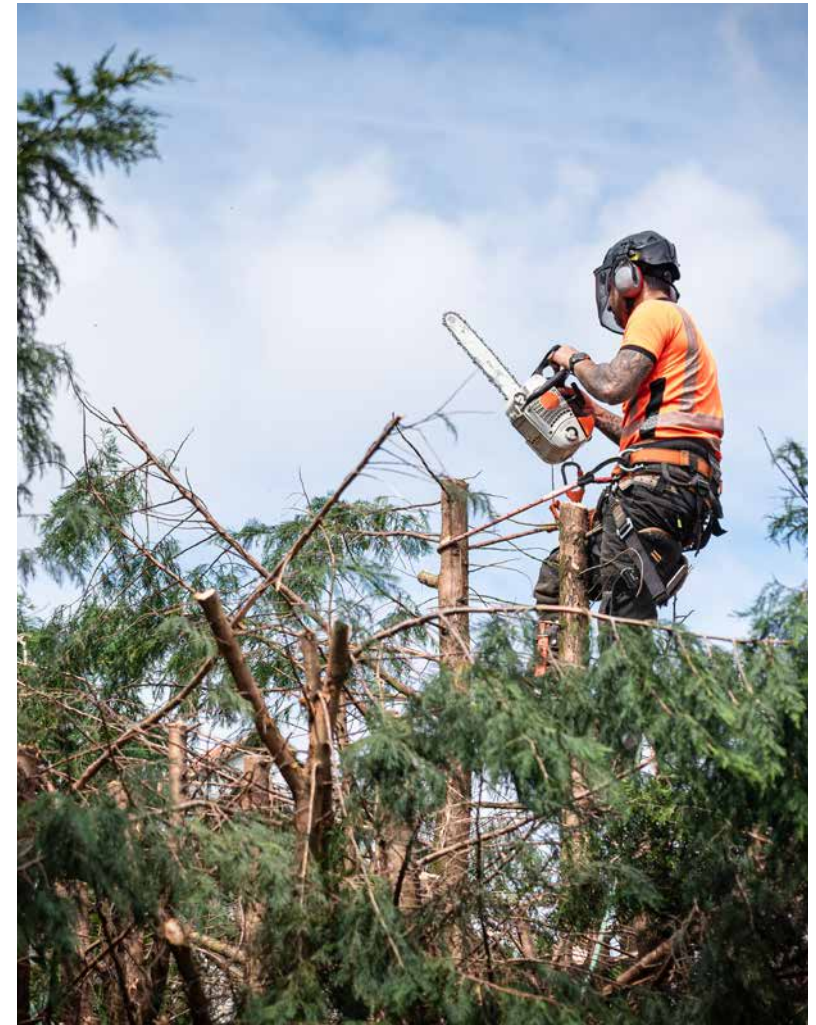
3.5 Productivity in the forestry sector

Overall productivity levels in Moray are consistently below the Scottish average. Addressing this would help enhance standards of living across the region and increase the overall contribution Moray makes to the Scottish economy.

Some sub-sectors of the forestry sector have a higher productivity when compared with the Moray average. Forestry and timber extraction and wood-based manufacturing is 6% and 10% higher than the regional average. These components of the sector are likely to be particularly important in driving the growth of the sector over the long-term and make a disproportionate contribution to the prosperity of Moray's economy.

3.6 Timber production, manufacturing and sustainability

3rd

UK is the third largest importer of timber

The UK is the third largest importer of timber in the world behind the US and China. Global demand for timber is set to at least double by 2050 according to the World Bank. The use of home-grown timber has advantages in terms of sustainability and in keeping economic benefits local.

The timber industry in the UK has been historically dominated by imports which delivered high volumes of a standard quality material at relatively low cost.

The existence of a vibrant UK sawmilling sector is dependent on consistent supplies of good quality affordable round wood, and this is delivered by Sitka spruce and Scots pine particularly for the larger sawmills. Moray has a competitive advantage in that both these commercial species grow well; however, many manufacturing businesses in Moray use imported timber. Smaller scale niche sawmills can use other timber species and can address the demand for more specialist bespoke products.

Meeting high quality standards is essential for wood using businesses of any size to compete effectively with imported timber. Architects/builders will only use timber products that are reliable in quality and availability terms but meeting stringent quality assurance and operational requirements is expensive and in small businesses this fixed cost has to be spread over a lower output.

3.7 Barriers to increasing the health and well-being benefits of woodlands, forests and trees

Consultees felt that there are likely to be sectors of the community who do not regularly access Moray's woodlands and forests. This may be due to a number of factors including a lack of knowledge of what is there to enjoy, limitations of transport and/or lack of connection to the natural world.

The lack of all-abilities paths within many of the woodlands in Moray inhibits access for some people with mobility issues and the poor condition of paths and other facilities, including car parking, in some areas was also considered to be a barrier to access. Data on the use of woodlands and forests is not available and this would provide a more complete picture on the access constraints present for some people.

In terms of community use of woodlands, some consultees reported that there was a lack of interest in community involvement in the management of woodland and that it takes considerable work to sustain the interest of volunteers. Insurance costs for recreational facilities provided by woodland owners are high. Purchase of woodland is increasingly expensive, and grants from the Scottish Land Fund not always assured, and this is likely to inhibit future community ownership of woodlands.

People and organisations wanting to use public forests for events and activities report the complicated permissions commonly required by FLS.

In urban areas, new trees are often not being planted as future replacements for existing mature and over- mature street and park trees. The protection of trees on development sites is a key issue and new tree planting associated with recent housing developments has tended to comprise shorter-lived, small species such as cherry and rowan rather than the more statuesque oak, beech and horse chestnut favoured by past generations. These larger trees are more valuable for biodiversity but also in terms of their greater visual prominence and ability to provide an attractive setting to buildings and shade/shelter for people.

Page 397

3.8 Lack of investment in recreation and tourism facilities

Many private forest owners in Moray provide car parking and footpaths (free of charge) but they generally do not receive funding for their installation or for the continued maintenance of these facilities and this results in little incentive to invest further in facilities.

Support infrastructure for visitors to Moray is limited; for example there are few low-cost accommodation options close to the long-distance trails which are a key tourist asset.

Moray's woodlands and forests are not specifically promoted in tourism strategies and there appears to be limited knowledge of the great recreational resource they provide. This applies to both sectors of the local population and visitors from further afield. The lack of data on visitor numbers prevents a strategic vision of recreational opportunities and connectivity.

Page 398

4 Vision & objectives

Vision

Increase the **value and benefit** of Moray's woodlands; to support **economic growth**, improve **biodiversity** and our **climate response** and provide opportunities to boost **health and wellbeing**.

Objectives

Increase new multi-benefit woodlands in Moray

▶ Define opportunities for new multi-benefit woodlands.

▶ Provide supportive policy for expanding Moray's forest cover.

Optimise the economic potential of Moray's woodlands

▶ Protect and enhance Moray's productive woodlands.

▶ Increase forestry-related skills and education and boost employment in the industry.

▶ Support growth and expansion of existing local timber processing and manufacturing businesses.

▶ Increase the number of tourist visitors to Moray woodlands and forests.

Improve the health and vitality of Moray's woodland ecosystems

▶ Protect important woodland habitats and species.

▶ Help the recovery of nature by connecting and increasing biodiverse woodlands.

▶ Improve the resilience of woodlands to climate change.

Foster greater connection between Moray's communities and woodlands

▶ Promote the use of woodlands to improve health and well-being.

▶ Encourage urban planting and the creation of woodlands close to settlements.

▶ Expand Moray's network of woodland based leisure and recreation infrastructure.

▶ Promote the 'start to finish' forestry-related economy of Moray.

These objectives are addressed in more detail in Sections 5-8 of the strategy with a summary of key actions set out in Section 9 Delivering the Strategy.

5 Increasing new multi-purpose woodland in Moray

5.1   Opportunities for new multi-benefit woodlands

We will seek to expand both productive woodlands and woodlands created with a primary conservation or recreational objective in Moray within a balanced mix of land uses.

Both types of woodland are important in assisting in combatting the effects of climate change and both can enhance biodiversity, economic output and health and well-being to varying degrees provided they are well-located and designed. Planting of new productive woodlands has the potential to increase the availability of local timber sources and to further reduce carbon emissions associated with transportation.

Spatial guidance is shown in Map 4 which indicates Preferred, Potential, Potential with Sensitivities, Unsuitable and Sensitive areas for new woodland creation across Moray. The methodology adopted for the mapping analysis is set out in Appendix A.

The total area for each of the categories defined on Map 4 for woodland creation is shown in this table:

We will provide positive responses to woodland creation schemes located within the Preferred and Potential categories and in relation to schemes within the Potential with Sensitivities category where identified constraints have been addressed.

More detailed spatial guidance is also provided below with the aim of directing woodland creation to areas where it could potentially have the greatest environmental and/or community benefit.

Total areas for each sensitivity category

Land category	Area (ha)	%
Existing woodland	63,604	34
Sensitive	21,930	12
Likely to be unsuitable	11,754	6
Preferred	68,383	36
Potential	4,736	3
Potential with sensitivities	17,059	9
Total hectares	**187,466**	**100**

Page 403

Map 4 **Preferred areas for new woodland creation**

Legend:
- ☐ Moray woodland & forestry strategy boundary
- ▇ Exisiting woodland
- ▇ Likely to be unsuitable
- ▇ Potential
- ▨ Potential sensitive
- ▇ Preferred
- ▇ Sensitive

Identification as a preferred area does not imply automatic approval of woodland planting proposals. Applications will be assessed based on site specific conditions.

The potential sensitive areas may be associated with carbon rich soils. A site soil/peat survey is required to assess planting suitability.

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Page 404

5.2 More detailed guidance for new woodland creation

Six broad landscape areas have been defined across Moray with the purpose of providing more specific locational guidance on woodland creation and other related opportunities. These areas are shown on Map 5.

Coastal Plain

This area includes some of the most fertile land in Moray and it is largely intensively farmed although the productive pine-dominated forests of Culbin, Roseisle and Lossie are planted on sandy soils along the coast. Culbin and Roseisle Forests are particularly well-used for recreation. Small and often isolated productive conifer woodlands are present within the farmed plain and mixed woodlands are associated with estates such as Pitgaveny, Spynie, Findrassie, Westfield and Brodie. Riparian woodlands are present along the lower reaches of the Rivers Spey and the Findhorn. Hedgerows and field trees are present in some areas although farmland in parts of this area has an open character with depleted field boundary planting.

The main settlements of Elgin, Forres, Fochabers, Buckie, Burghead and Lossiemouth are located in this area. Forres is particularly well-endowed with woodland on the edges of the town, with much of this managed by community groups. Extensive woodland also arcs around the northern and north-western fringes of Elgin. Lossie and Roseisle Forests lie close to Lossiemouth and Burghead and Fochabers is surrounded by the woodlands of Gordon Castle estate, Ordiequish and Whiteash. There is relatively little woodland lying close to Buckie.

The good soils associated with the coastal plain preclude the creation of extensive woodland with much of the area shown as lying in the sensitive category on Map 4. However, there are opportunities to enhance biodiversity on farmland which falls into this category by undertaking predominantly native planting to improve the connectivity of often isolated small woodlands, tree belts, hedgerows and field trees. This type of planting would also help to alleviate soil erosion on arable land. Management of existing native and mixed woodlands should be a priority to ensure their longevity. There are also opportunities for the creation of productive and other woodlands with these most extensive in the eastern part of this area.

Special Landscape Area designations cover Cluny Hill near Forres, Spynie near Elgin and the Moray coast.

Page 405

Map 5 **Detailed spatial guidance**

A   Coastal Plain
B   Western Forests and Farmland
C   Eastern Forests and Farmland
D   Western Uplands
E   South Eastern Hills and Glens
F   Spey Valley

Existing woodland cover

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Page 406

The following woodland creation initiatives are already in place in this area:

▶ Riparian planting for flood management, carbon sequestration and habitat restoration within the lower reaches of the Findhorn and the Muckle Burn as part of the River Findhorn Watershed Initiative and the Findhorn, Nairn and Lossie Rivers Trust.

▶ Riparian planting planned within the lower reaches of the River Lossie north-east of Elgin as part of the Elgin Flood Alleviation Scheme.

▶ The Moray Farm Cluster Initiative where 15 landholdings have joined together to consider woodland and hedgerow management and creation across a broad area.

▶ Small areas of woodland planting proposed around Elgin as part of the Bilbohall and Findrassie settlement expansion proposals.

▶ Woodland management including new tree planting associated with community woodlands around Forres and Findhorn.

Other initiatives that could be considered in this area include:

▶ The creation of a woodland/green sustainable travel route (potentially based on the former railway line route) from the southern edges of Elgin to Millbuies Country Park.

▶ Top-up grants provided to landowners with existing woodlands close to urban areas to assist in the provision and maintenance of recreational facilities within easy reach of local communities.

▶ Top-up grants for new woodlands close to settlements, with this particularly targeting the Elgin, Buckie and Lossiemouth area (MOD constraints allowing) where there are fewer community-owned woodlands in close proximity to settlement unlike Forres where there is very good provision.

▶ Promotion of community leasing arrangements for woodlands close to settlements (advice and assistance for groups) and top-up grants for creation of community orchards, fruiting hedgerows and small woodlands.

▶ Potential Woodlots pilot scheme in Council owned woodland, for example Sanquhar Woodland near Forres (the proximity to the urban area may make this less attractive in terms of security than a more isolated woodland area but could have community and educational benefits).

▶ Planting of small native woodlands, trees and hedgerows on farmland, including gradual replacement of mature ash which are a key characteristic of parts of this area, planned to improve connectivity with existing isolated woodlands.

Page 407

Western Forests and Farmland

This area is one of the most extensively wooded parts of Moray and this limits scope for new woodland creation. Productive forests, predominantly comprising Scots pine, lie either side of the Findhorn valley in the west and are largely owned by the estates of Darnaway, Altyre and Logie. More mixed coniferous productive woodlands are present in the eastern part of this area planted on ridges and upland fringes; these are both privately and publicly owned and include the Moray Council owned Millbuies woodland estate. The continuous cover management practised by the large estates in the west has resulted in an attractive age diversity of trees and a varied woodland understorey. Some native woodlands within the Findhorn valley are designated for their nature conservation value.

Small pockets of open ground within woodland are scenically important in the west, particularly where they allow views over the Findhorn and Divie valleys. They often also comprise farmland which is valued as part of a balanced mix of land use. Retaining open ground in the lower Pluscarden valley is also important due to the presence of the Special Landscape Area where views to Pluscarden Abbey and the contrast which occurs between the flat farmed valley floor and steep densely wooded slopes are important special qualities. The upper reaches of this valley are less important in this respect and natural regeneration of scrub woodland is already evident in this area. The eastern part of this area has been affected by woodland removal to accommodate dispersed rural housing (west of Fogwatt) and plantation woodland is generally more even-aged and less diverse in this area.

Special Landscape Area designations cover the Findhorn valley, the Pluscarden valley and Quarrel Wood near Elgin.

The following woodland creation initiatives are already in place in this area:

▶ The River Findhorn Watershed Initiative, creation of 'Riverwoods' in the upper catchment of the Findhorn valley (much of the focus of this initiative is in the less wooded upper reaches of the river which lie outside Moray).

Other initiatives that could be considered in this area include:

▶ Planting of both native and productive woodland in the area west of Fogwatt (where existing plantations are even-aged and often fragmented) to increase age and species diversity and the connectivity of isolated plantations.

▶ Consideration of expansion of woodland around Millbuies Country Park and creation of woodlot leases as a pilot scheme within woodland owned by Moray Council.

▶ Riparian planting along the upper Lossie between Elgin and Dallas linking with existing native woodlands and isolated coniferous plantations on north-facing valley sides below the Rothes wind farm.

▶ Retention of the 'estate' influenced character of avenues and occasional exotic trees edging productive woodlands in the lower Pluscarden valley and supplementary planting to ensure the longevity of this key characteristic of the Special Landscape Area.

Page 408

Eastern Farmland

This part of Moray is less wooded than the west although medium-sized productive coniferous forests are present on low hills and upland plateaux in the Bin of Cullen, Aultmore, Whiteash, Ordiequish and Meikle Balloch areas. Wind farm construction on Caird Hill and consents for wind farms on Lorg Hill and Aultmore will be likely to result in some loss of woodland in these areas. Smaller plantations are dispersed across this area and there is generally little native woodland although some mixed woodlands are associated with the estates of Letterfourie and Cullen. Farmland in the core of this area around Grange Crossroads is open with little in the way of hedgerows or field trees and few riparian woodlands. The quality of the landscape around Keith is affected by overhead transmission lines, distillery warehousing and a busy road network and there are few woodlands within easy walking distance of this settlement.

The Deveron Valley in the eastern part of this area is designated as a Special Landscape Area.

While no specific initiatives apply to this area, Forestry Grant Scheme (FGS) proposals for woodland creation are present in parts of this area (as they are in all the other areas considered in this detailed guidance).

This area offers the greatest opportunities for new woodland creation in Moray with extensive areas of the Preferred category identified on Map 4. Initiatives that could be considered include:

▶ Planting of primarily native woodland, including riparian woodland, hedgerows and field trees, to improve connectivity between existing small coniferous plantations on farmland.

▶ Planting broadleaved native trees and shrubs at the interface of larger productive coniferous plantations and farmland (the lower margins are the most visible part of these coniferous plantations due to the subtle landform of the hills they cover and this measure would enhance often abrupt and angular edges).

▶ Primarily productive woodlands could also be planted on more open upland fringe farmland and would be particularly valuable where they formed extensions of existing woodlands which ameliorated poorly designed margins.

▶ New woodland creation around Keith (possibly funded by, or forming an integral part of, large scale infrastructure projects) to provide landscape enhancement and increase opportunities for community access to woodlands in close proximity to the town. This could include creating a woodland link (and off-road walking/cycling route) to Balloch Wood.

Page 409

Western Uplands

This area is well-wooded in the north-west where productive woodlands are present in the Newtyle Forest/Romach Hill area and across the uplands surrounding the upper Lossie valley. There are also extensive plantations of Sitka spruce and pine in the Hunt Hill area immediately north of the Spey valley. The scale of these FLS woodlands is not appreciated from public roads and settlement and public use tends to be relatively limited. Some of this productive woodland will be removed as part of the consented Rothes III and Clash Gour wind farms (and as part of the peatland restoration planned as part of these developments) and it may be replanted in another part of this general area or elsewhere in Moray. A large woodland creation scheme has recently been planted on the slopes of Carn na Cailliche.

The western part of this area includes the moss of Moidach More which is designated for its nature conservation interest and is consequently sensitive to woodland creation. Natural regeneration of Scots pine is evident on the fringes of this area, for example in the valley of the Divie Burn, on the slopes of Carn Biorach and in the upper Lossie valley south-west of Dallas.

There are some FGS woodland creation proposals in this area and moorland habitat restoration and management plans form part of the consented wind farm proposals.

Much of the unplanted part of these uplands is categorised as Sensitive, Unsuitable or Potential Sensitive. This may not preclude native woodland planting in some areas although opportunities for all types of woodland creation are largely confined to the outer fringes of these uplands. Initiatives that could be considered in this area include:

▶ Planting of primarily native woodland to enhance the most visible uniform and angular lower margins of coniferous woodlands (particularly those seen to the north of Archiestown).

▶ New woodlands should be designed to improve connectivity with existing isolated small woodlands on farmed lower slopes, improving biodiversity and enhancing landscape character – such an initiative may necessitate joint landscape scale schemes between adjoining landowners.

▶ Encourage natural regeneration of Scots pine and other native broadleaves on the fringes of moorland in the upper Lossie valley/Yellowbog area and on the western edges of this area in the Divie Burn valley and on the lower slopes of Knock of Braemoray.

Page 410

South-eastern Hills and Glens

This area is more wooded in the north but generally comprises open moorland and upland farmland in the south around the Cabrach. The high hills lying either side of Glen Rinnes, including Ben Rinnes, Meikle and Little Conval to the north-west of this glen and the rugged upland ridge with Corryhabbie hill its high point lying to the south-east, are largely open. Some medium sized coniferous woodlands are located on lower slopes and hills within Glen Rinnes and close to Glen Fiddich and numerous small dispersed geometric coniferous plantations pattern. The upper Deveron valley, Glen Rinnes and lower Glen Fiddich are predominantly farmed with small and often isolated coniferous plantations and some birch dominated riparian woodlands.

Special Landscape Areas cover Ben Rinnes and associated uplands and a small part of the Deveron valley where it borders a similar local landscape designation in Aberdeenshire. The south-eastern part of this area abuts the Cairngorms National Park.

Map 4 showing sensitivity to new woodland creation categorises a broad swathe of the higher ground in the southern part of this area as Sensitive or Potential Sensitive principally due to the likely presence of carbon rich soils. The Preferred category generally applies to lower hill slopes and glens.

The following woodland creation initiatives are already in place in this area:

▶ Cabrach Community Initiative – riparian planting and other woodland creation and habitat enhancement measures.

▶ The Cairngorms National Park additional grant payment (on top of FGS) to encourage creation of native woodlands in

target areas shown in the Cairngorms National Park Forestry Strategy (2018). Areas of Preferred and Potential areas for new woodland lie adjacent to Glen Livet and the Cromdale Hills on the boundary of the Moray Woodland and Forestry Strategy area.

Other initiatives that could be considered in this area include:

▶ Planting of primarily native woodland, including riparian woodland, hedgerows and field trees within the farmed glens and valleys for enhancement of biodiversity and landscape character.

▶ New multi-benefit woodlands on hill slopes and upland fringes which could improve connectivity and ameliorate the poor design of dispersed coniferous plantations thus enhancing landscape character.

▶ Management and expansion of remnant broadleaved woodland in Glen Fiddich and in Glen Rinnes.

▶ Creation of native woodlands to create a natural appearance on the lower slopes of the high rugged hills which lie in this area, including Ben Rinnes and the hills lying to the south-east of Glen Rinnes, The Buck and the Cromdale Hills. Some of these areas border the Cairngorms National Park and the creation of native woodlands would align with the objectives set out in the Cairngorms National Park Forestry Strategy in relation to improving forest habitat networks.

▶ Protection and expansion of existing areas of juniper scrub and associated native woodland in the Cabrach area.

▶ Planting of productive and broadleaved woodland on the lower slopes of the Cabrach area which lie outside the Sensitive category.

Page 411

The Spey Valley

The Spey valley is broad and well-wooded with a diverse mix of productive and mixed estate-influenced woodland. The northern part of this area includes part of the extensive productive FLS woodland on Ben Aigan and lying north and south of Rothes to the west of the River Spey. A broad undulating shelf of farmland lies to the north of the Spey between Archiestown and Knockando and is patterned with small even-aged spruce and pine plantations, some of these planted on peaty soils. Low hills in the southern part of this area are capped by predominantly coniferous woodland. New woodland planting has been undertaken as part of recent distillery expansion in this area.

The whole of this area is covered by the River Spey Special Landscape Area.

Existing initiatives in this area include the Spey Catchment Initiative which includes riparian woodland planting in the Craigellachie area and some individual FGS woodland creation proposals.

The floodplain farmland on the floor of the Spey is categorised as Sensitive in Map 4. The extent of existing woodland in this area additionally constrains scope for new woodland creation with opportunities largely confined to the upper valley sides. The balance of open space to woodland is important to consider both in terms of retaining the scenic qualities of the Spey valley and open views to Ben Rinnes in some areas as well as a balanced mix of land uses and marginal grassland habitat for wildlife in some areas.

Other initiatives that could be considered in this area include:

▶ Planting of primarily native woodland, hedgerows (where these are an existing landscape characteristic) and field boundary trees to enhance connectivity with riparian woodlands on the farmed floodplain areas against the Spey.

▶ Creation of new multi-benefit woodlands on upper valley sides and upland fringes which could improve connectivity and ameliorate the poor design of dispersed small coniferous plantations.

Page 412

6 Optimising the economic potential of Moray's woodlands

6.1   Protect Moray's productive woodlands

Loss of productive woodland may occur through progressive forest restructuring and potential future large-scale development such as wind farms, roads construction and electricity transmission projects.

The protection of existing productive woodlands is important to ensure a sustainable timber source benefiting employment and helping to combat climate change. This aim is also related to our objective of increasing the area of productive woodland in Moray to enable expansion in the production and use of local timber.

We will continue to require compensatory planting to take place in Moray or a commuted payment to be paid in line with LDP Policy EP7e. We will also react positively to proposals for well-designed productive woodlands sited in the least sensitive parts of Moray provided identified constraints have been addressed.

6.2   Increase forestry-related education & skills and boost employment in the industry

The Institute of Chartered Foresters suggest there is an urgent need to address the lack of young people attracted to working in forestry by:

▶ Addressing misconceptions amongst the public about the value of the sector.

▶ Enhancing coverage of the sector in the school curriculum.

▶ Raising awareness of the career opportunities in the sector.

There are two institutions offering forestry courses in Scotland, Scotland's Rural College (SRUC) and the Scottish School of Forestry which is part of the University of the Highlands and Islands (UHI). The Scottish School of Forestry was established in 1972 and has moved to a new building at Balloch, west of Inverness, in 2016. Its proximity means it is an important asset to Moray's forestry sector. The school offers HNC, HND and BSC degree courses in Forestry and Forest Management. Courses are full time or part time and one-year pre-course experience in the woodland environment or a Certificate of Forestry may be required for some candidates.

An apprenticeship scheme is run by James Jones and Christies Elite nursery and FLS and some private estates also take on forestry apprentices. The Forestry and Arboriculture Training Fund initiative from the Scottish Government covers costs for short practical courses.

Research is currently being undertaken by the Scottish School of Forestry on ways of attracting young people into the industry. This is inspired by curriculum models linking schools to forests in Wisconsin US where 27,000 acres of forest land have been registered to 255 schools in the state and have helped attract more young people to careers in forestry. A possible pilot study is being considered in Highland and/or Moray which may involve linking schools to woodlands in a similar way.

Given the importance of the forestry sector to Moray's economy and the significant skills shortages it faces, establishing a mutually beneficial collaborative venture with the Scottish School of Forestry represents an opportunity. This will go hand in hand with increasing knowledge of the forestry industry in Moray, not just amongst young people thinking about future careers but across the whole community, including older people looking for a change of career. Nurseries, landowners and sawmills within Moray have worked collaboratively to promote forestry as a potential career, and there is scope to build on this work and with initiatives undertaken by Scottish Forestry.

Page 415

We will investigate skills and educational opportunities (identifying any gaps in specialised skills) working with key stakeholders to identify ways of attracting more people into the forestry sector and providing opportunities for training and education. We will also seek to facilitate links between local employers and organisations such as Wild Things who support young people through building connections with nature and woodlands.

Given the proximity of all elements of the forestry cycle within a small geographical area in Moray, there is potential for an organised day long field trip to encompass visits to the whole forestry cycle from nursery growing, to planting and felling sites, to sawmill, manufacturing facility and a building construction site. This could act as a showroom for what productive Scottish forestry is all about, serving the dual purpose of enabling a greater understanding of forestry in the wider public and encouraging people to consider a career in forestry. Many consultees across the forestry sector in Moray could see the potential benefits of this approach and were willing to consider working collaboratively to achieve this.

6.3   Encourage the increased use of local timber in processing and construction

Timber production plays an important role not only in carbon sequestration but also in providing a sustainable substitute for carbon intensive materials such as steel and concrete.

This enhanced benefit has been shown to be very significant by research and the House of Commons Environmental Audit Committee which produced a report titled *Seeing the wood for the trees: the contribution of the forestry and timber sectors to biodiversity and net zero goals* (Fifth Report of Session 2022–23).

Localising timber production, adding value, reducing transport distances and embracing the circular economy provide wider benefits in terms of climate change, economic resilience and social justice, creating an environment that is conducive to the thriving domestic forest industry, but ultimately economic factors and price are still the main drivers that determine whether home grown industries thrive or fail. The historical trend for sawmills to become fewer and larger has recently tended to be reversed with a number of small sawmills opening to service niche demands. These mills often work in a complementary way to the larger sawmill as they are more adaptable to small-scale local demand and can often utilise a wider species and size range. Where the sawn timber can be used locally then this also increases the competitive advantage of small mills and demonstrates their sustainable credentials.

We will identify and explore ways of removing barriers to the use of local timber which would increase the sustainability of businesses and potentially increase employment in Moray. We will work with forestry organisations considering ways of encouraging architects and builders to choose local timber. Meeting quality and operational requirements is key to expanding the use of domestic timber. Collaborative working or the establishment of a size proportionate system of quality standardisation could help to keep this administrative cost at a reasonable level and ensure that small mills can still compete on price. Moray-produced sawn timber/timber products, used locally for a wide range of applications, offers significant sustainability, social and carbon benefits, but meeting quality requirements consistently and competing on price are challenges. A presumption on the preferred use of home-grown timber on the basis of its environmental and carbon credentials may be an option to consider that avoids protectionist complications.

Page 417

6.4 Grow the number of sustainable timber processing and manufacturing businesses in Moray

Linked to the above objective, we will work to increase the diversification of forestry-related businesses in Moray in terms of their size and the type/supply of timber that could be used.

We will particularly aim to expand the region's strength in timber engineering which embodies a significantly higher level of added value than the more traditional manufactured timber products that comprise most of the output of the UK sector. There is scope to expand the range of engineered timber products at all scales, and for small timber processes this can create a significant market opportunity, for instance the use of local roundwood in engineering structures reduces wood waste and processing costs and provides a sustainable, adaptable and easily worked material.

The demand for wood fuel at scale and to meet local demand for logs is strong and this could provide an opportunity for more farmers to become involved in timber harvesting and processing using machinery at quiet times of the farming year and bringing their own woodlands into active management. Many farmers have already embraced this opportunity.

We will aim to strike a balance in relation to economic interventions in terms of maintaining the viability of established businesses while at the same time expanding the number and diversity of businesses. Interventions in terms of grant incentives can destabilise functional economic systems.

In terms of improving the sustainability of the forestry industry the use of electric vehicles by forest managers and contractors is increasing and electric vehicles and vehicles adapted for hydrogen for timber haulage are being trialled. Advances in timber technology and utilisation of round timber can all make better use of the product and lead to a reduction in carbon emissions. Simple processes such as using offcuts and waste wood to generate heat or energy on site can reduce the carbon footprint of kiln drying significantly. One of the main advantages that Moray possesses for carbon friendly forestry are the short transport distances to sawmills and end users.

Page 418

6.5 Increase the number of tourist visitors to Moray's woodlands and forests

We will support greater promotion of Moray's woodlands and forests for recreation and tourism. This will include consideration of a special forest park, or similar designation, in recognition of the importance of woodlands and forests to the region.

We will work with Visit Scotland and Visit Moray Speyside to identify ways of increasing visitors and addressing any improvements needed to wider visitor facilities including accommodation and transport.

We will also work with FLS to encourage greater investment in recreational facilities in their forests in Moray and will consider ways in which assistance can be given to encourage landowners to provide and maintain visitor facilities such as car parks and footpaths in woodlands and forests.

Page 419

7 Improving the health & vitality of Moray's woodland ecosystems

7.1 Protect important woodland habitats and species

We will investigate ways of gaining greater protection of native woodlands where their longevity is threatened by lack of management and overgrazing.

The genetic resilience of these woodlands (and particularly woodlands protected as SSSIs) should be maintained by natural regeneration where possible (controlling deer and livestock in favour of fencing) or using seed sourced and grown on from the woodland.

Landowners often do not have the knowledge or financial incentives to manage these woodlands and we will work with other partners to identify woodlands at risk across Moray and consider ways of encouraging landowners to utilise the natural capital of their woodlands.

Page 421
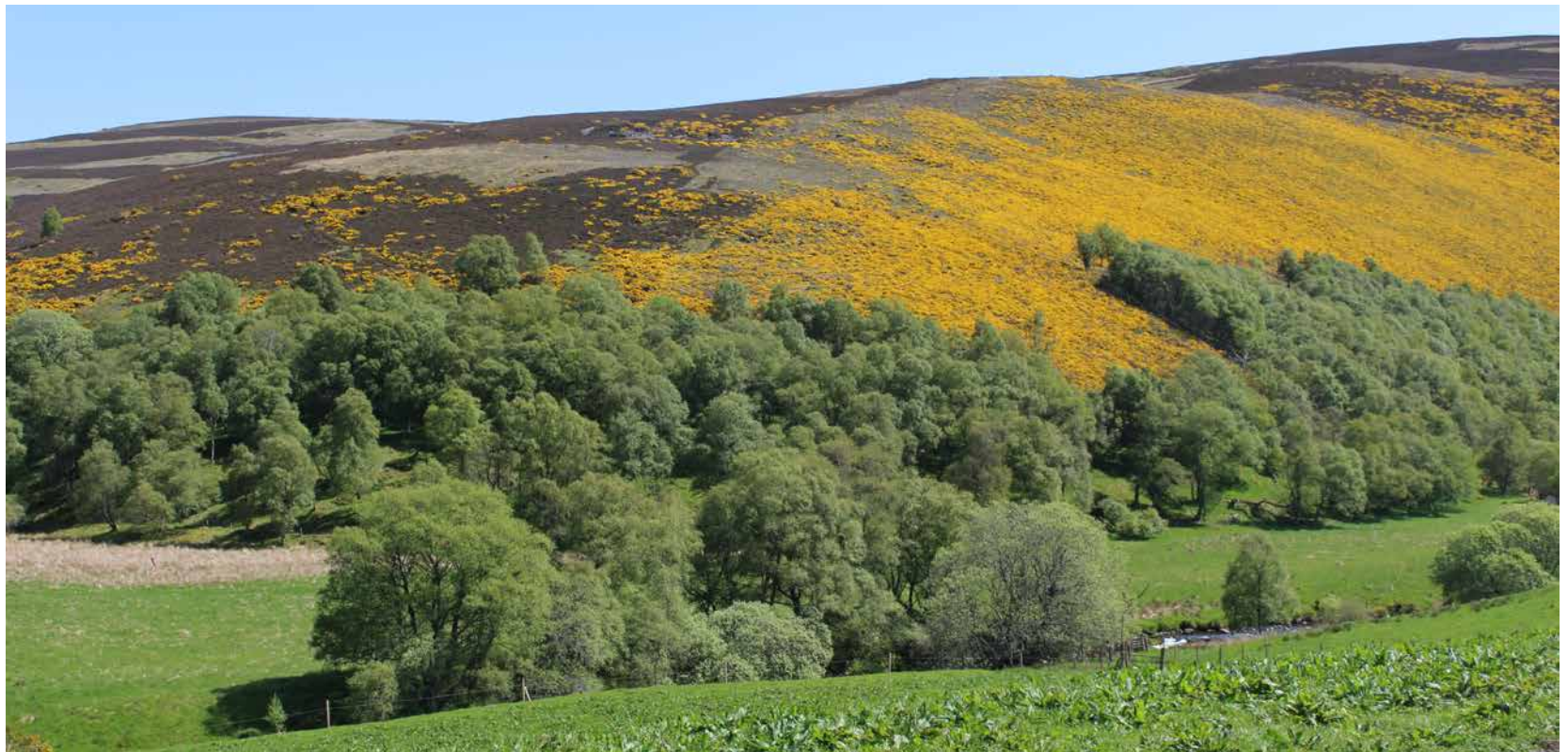
7.2 Help the recovery of nature by connecting and increasing biodiverse woodlands

Our aim is to support the planting and establishment of native woodlands to improve connectivity with existing woodlands. We will also look to increase the range of woodland habitats established within Moray, including areas of montane woodland on higher hill ground and to expand existing areas of juniper scrub.

Expansion of woodland in areas surrounding designated woodlands will increase their size and provide a transition between higher and lower quality habitats in the surrounding landscape. Riparian planting will also be encouraged to build healthier and more resilient watercourses and to connect remnants of native and ancient woodland. Urban planting schemes can provide linkages to core woodland habitat in the wider landscape as well as providing health and well-being benefits close to where people live.

For all woodland creation schemes, the use of locally sourced native stock and seed sources which are suited to the climate and local conditions is desirable. This is especially important when planting near to existing native and ancient woodland.

Whilst woodland creation is an important tool for building nature networks, it is important that it is not delivered at the expense of other valuable habitats such as peatlands, wetlands and semi-natural grasslands or where it may adversely affect their connectivity. Sites designated as important for such habitats have been considered within the spatial guidance accompanying this strategy. Good examples of these habitats are also present outside of such designated sites, and so detailed site-specific assessments are required to ensure woodland creation occurs in the most appropriate places.

Courtesy of Spey Catchment Initiative

Page 422

Small conifer plantations on farmland in some parts of Moray are often isolated and make a suboptimal contribution to biodiversity (and to landscape character where they are poorly designed in relation to landform). We will encourage farmers and landowners to consider enhancement of existing woodlands through new farm-wide plans which include the planting of field boundary trees, hedgerows and the creation of riparian and small woodlands which will form part of integrated initiatives to improve biodiversity and nature networks on farmland across Moray while minimising effects on productivity.

We will seek to optimise opportunities to enhance biodiversity and landscape benefits in our responses on new forestry proposals and Forest Plans for existing woodlands.

We will also ensure that developers adhere to the stronger requirement in NPF4 for development proposals to offer mitigation and enhancement measures aimed at strengthening nature networks. With this in mind, we will require major developments to include broader 'landscape scale' mitigation and enhancement measures to include more extensive planting of native broadleaves outside an application site with the aim of increasing biodiversity and landscape benefits. We will also require a full evaluation of the biodiversity value of woodland proposed to be removed to accommodate new development as a precursor to defining an equitable compensatory planting area or commuted payment amount in accordance with our requirement for habitat reinstatement.

Moray Farm Cluster Initiative

The Initiative involves 15 farmers/land managers of various scales across the Laich of Moray who have joined together with the aims of enhancing landscape and biodiversity and increasing climate and economic resilience across approximately 6600 hectares of land.

The area covered by the Initiative includes some of the best agricultural land in Moray and the objective is to retain productive farmland but to enhance biodiversity around it. The corridors of the rivers Lossie and Spynie, the Spynie canal and the disused railway line will form a focus for enhancement with the management and extension of existing wet woodland and new riparian woodland proposed.

Existing woodland across farmland will be managed, with the removal of invasive species and deer control comprising principal management measures, and new small farm woodlands will be created. Tree and hedgerow planting is planned along field boundaries to help prevent soil erosion and enhance wildlife habitats. Opportunities for public access are additionally being considered as part of the Initiative.

The group have received Highlands and Islands Environment Foundation funding to set up the Initiative and help them prepare an application to the Nature Restoration Fund.

Page 424

7.3   Improve the resilience of woodlands to climate change

Woodland creation, the production of timber locally (replacing carbon intensive building materials such as concrete and steel) and the regeneration of existing woodland all play a key role in combating climate change.

Climate change may however increase the ecological and economic risks for forestry in terms of changes in rainfall, varying temperatures, wildfire and storm events and disease/pest risk.

Diversity is generally associated with greater resilience and across the forest as a whole a diverse range of age classes, silvicultural types and species well adapted to the site are likely to reduce the risks from climate, storms, fires and diseases. Species choice for new planting is guided by use of the Ecological Site Classification (ESC) system which can include assessments based on climate projections using models. Models are an approximation of reality with variable accuracy; however using ESC with good soil data is a useful guide to ensure the right tree is planted in the right place. A major consideration in terms of disease impacts is that vigorous fast-growing trees are much less susceptible to diseases than stressed trees growing on an unsuitable site. The process of species selection is well understood by foresters, and the current Forestry Grant Scheme process overseen by Scottish Forestry is an effective mechanism for delivery of multi-purpose resilient woodlands. The UKFS specifies minimum proportions of species types and open ground and this plays a key role in ensuring diversity.

The management of most forest areas is also undertaken with oversight by Scottish Forestry via the control of felling and the Long Term Forest Plan process. Most forest plans seek to increase diversity in terms of species, age class and structure.

Trees and woodlands while mitigating climate change through carbon sequestration can also protect and enhance the local habitat for other land uses, for example by providing shelter for stock, reducing wind erosion on light soils, improving water quality and the biodiversity of water courses as well as reducing flood risk.

In terms of wildfire risk, good access for the fire service is essential for control where fast reaction times can increase effectiveness. A diverse age class structure of trees can also help reduce fire and wind damage risks.

8 Fostering greater connection between communities & woodland

8.1 Promote the use of woodlands to improve health and well-being

Encouraging greater use of woodlands

We will encourage the use of woodlands for early years education, investigating the expansion of Forest Schools and the possibility of creating links between individual schools and nearby woodlands. We will work with partners to improve recreational facilities in our woodlands and forests which can be used by people of all ages and abilities This will also include exploration of ways of promoting outdoor forest-based activities as part of Green Prescriptions recommended by health professionals.

Community ownership and/or management of woodlands

We will provide support for community woodland groups including initiatives designed to:

▶ Help community groups identify and secure suitable land for acquisition or leasing.

▶ Provide information and advice on the legal, financial and technical aspects of acquisition or leasing and management of woodland.

▶ Promote and facilitate the sharing of good practice and experience among community woodland groups and other stakeholders.

A standard for community engagement in woodland management should be put in place with this based on the national standards and informed by good practice guidelines. We will provide access to central support for community groups and we will interface with other third sector support organisations to make connections between people who are involved or interested in community woodland in Moray. Community groups will be made aware of grants available to them.

Lease arrangements offer scope for community involvement with low barriers to entry in terms of capital requirements compared with an outright purchase. Maintaining public ownership of the woodlands while leasing to the community also provides a safety net in the event of financial issues or changing priorities.

Woodland crofts

Woodland crofts could be a means of increasing connections with woodlands and forests and can be associated with a range of benefits for both nature and the community. Woodland crofts are registered crofts with sufficient tree cover to be considered a woodland under national forestry policy. They can generate similar benefits to regular crofting but also create opportunities to utilise the woodland resource to support a sustainable livelihood and a high standard of living for residents.

In 2010 Scottish Ministers designated parts of Moray as crofting areas, creating the opportunity to apply the approach more widely. However, it was not until early 2022 that this opportunity was first taken up by the owners of 5 acres of naturally regenerated woodland on the Moray coast. We will investigate the creation of an approved Moray Council policy in relation to woodland crofting.

Woodlots

Woodlots comprise small parcels of woodland which are usually leased by communities, small-scale forest businesses or individuals who do not wish to take on the risk or capital costs of purchasing woodland. They can enable woodlands to be managed sustainably for small-scale timber production with the woodlot leaseholder managing the woodland to an agreed plan that has been approved by Scottish Forestry.

Rentals are usually low with the improvement to the woodland being the main management objective. Forestry professionals and amateur foresters are generally envisaged as being suitable leaseholders for this type of management agreement but there is also scope for the process to promote training education and business start-ups by providing an entry point into the forest industry.

Woodlots have similar health and well-being and local economic benefits to woodland crofts but generally do not involve habitation on the site (but may require the holder to live nearby). From the owner's perspective, the arrangement offers the potential to increase the value of the woodland at low cost and is particularly suitable for small, hard to access woodlands that would otherwise not be commercially viable to actively manage.

Ardochy Forest

Glengarry Community Woodlands is a Development Trust and Company Limited by Guarantee with charitable status. It exists to advance sustainable community development, organise educational and recreational activities and advance environmental protection and improvement.

The Trust was formed in 2016 after the community purchased a 31-hectare forest in Invergarry. Since then, management has focused mainly on harvesting timber, setting up a firewood business and delivery of a community engagement programme.

In 2022 the Trust expanded its holdings through the acquisition of two further areas of woodland on either side of the A87. The sites, which cover a combined area of 66 hectares, were acquired as an asset transfer from Forest and Land Scotland, using funds provided by the Scottish Land Fund. The Trust intends to use these new sites to establish six woodland crofts and four affordable homes which will be delivered through a community-led project involving the Woodland Crofts Partnership and the Communities Housing Trust.

The project has been designed to encourage young people and families to remain in the area by creating new opportunities to generate income through the sustainable management of local woodland. In this way it is hoped that the project will help repopulate the glen and improve long-term sustainability. Any new homes sold as part of the project will have discounts protected in perpetuity though the application of a Rural Housing Burden, which also prioritises local communities in allocations, allowing control over future sales. The new crofts will be similarly protected to ensure their benefits are retained within the community upon any future change of occupation.

Page 429

8.2 Promote the 'start to finish' forestry-related economy of Moray

There is potential for Moray to be a national exemplar of what a forestry economy in a mixed landuse setting might look like.

This could also be used more locally to promote an understanding of forestry to decision makers and schools. We will facilitate a programme of visits to forests and forestry-related industries and talks for the community and also for Moray Council staff and members.

8.3 Encourage urban planting and the creation of woodlands close to settlements

National policy places importance on the health and well-being of communities. NPF4 includes policies on sustainable and liveable places, the creation of 20-minute neighbourhoods and active travel.

Urban trees and woodland are important for the health and well-being of communities and will become important as climate impacts become more severe.

Moray Council's Local Development Plan policies on Placemaking requires developers of 10 houses or more to create multi-functional spaces and networks which connect people and nature. Woodland is a feature in many of the larger settlement expansion developments proposed in Moray, for example in masterplans for the Bilbohall and Findrassie developments near Elgin. We will continue to support the creation of woodlands and orchards close to towns and villages which can be accessed by walking and cycling and which will offer recreational facilities and opportunities for people to be involved in their management. We will also encourage better management of existing woodlands and trees in urban areas and promote the planting of larger trees, such as oak and beech, which have a greater beneficial effect on the character of settlements and the well-being of residents.

We will also support the provision of more opportunities for children and young people to play and learn in woodlands and forests particularly close to urban areas.

Page 431
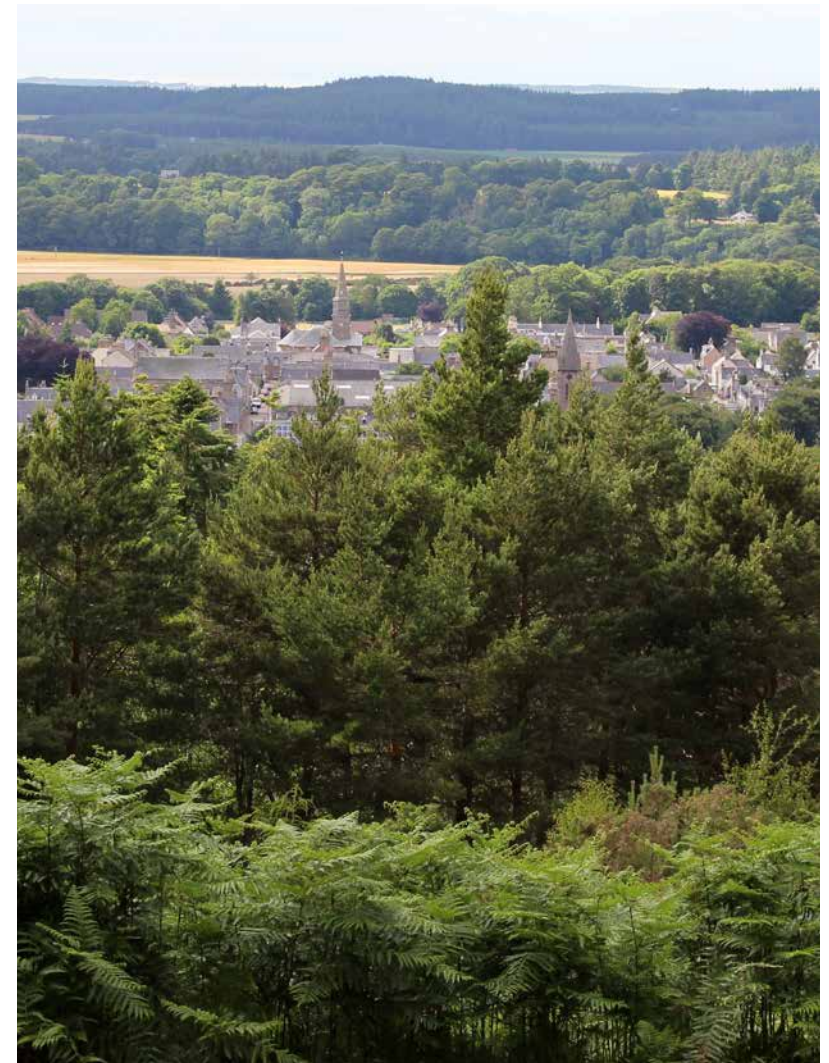
8.4 Expand Moray's network of woodland based leisure and recreation infrastructure

We will consider sustainable transport connections between urban areas and woodlands and ways of expanding recreational facilities and activities for local communities. This will include identifying opportunities for trails and facilities for all abilities.

We will continue to consider active travel routes within new areas of housing and the potential for linkages with existing and new paths, former railway routes and quiet roads in the wider countryside which would provide easy access to woodlands.

We will also identify opportunities for new trails and facilities for all abilities within woodlands, including the provision of nearby car parking for those less able to walk and cycle.

Page 432

9
Delivering the strategy

Timescales, delivered outcomes and potential funding will be explored further during consultation with stakeholders and added to the final version of this strategy.

Actions	Description	Outputs / Outcomes	Lead	Delivery partners
Increase new multi-benefit woodlands in Moray				
Increase Moray's overall forest cover	Support expansion of the proportion of Moray's land covered by woodland from 34% to 36% by 2030. This should include increasing productive forestry to help ensure a sustainable local timber source.	Increase the economic value of Moray's forestry sector, support carbon offsetting targets	Scottish Forestry	Moray Council, NatureScot
Optimise the economic potential of Moray's woodlands				
Promote forestry as a career choice	Encourage the engagement of young people with woodlands and with forestry skills early on by supporting bodies connecting communities with forests and investigating links between local woodlands and schools.	Identify ways of increasing familiarity with woodlands and the forestry industry and increasing interest in forestry and related industries as an attractive career.	Moray Council	Scottish Forestry, Confederation of Forest Industries, UHI Moray, Skills Development Scotland, Developing the Young Workforce Moray, Lantra, STEM
Increase local opportunities for accessing forestry-related training	Work with local and regional learning providers to develop and expand course offerings to meet industry needs.	Increased local training opportunities in forestry-related careers, improved employment prospects for local people, a skilled and sufficient workforce to meet sector demands.	Moray Council	Scottish Forestry, Confederation of Forest Industries, UHI Moray, Skills Development Scotland, Developing the Young Workforce Moray, Lantra
Creation of a local construction forum	Development of a new forum of local construction professionals supported by engagement from forestry businesses and public sector partners. The forum could also provide direction for other complementary initiatives such as retrofit	Increase awareness of locally grown timber produce, creation of a local network for forestry and construction businesses	Moray Chamber of Commerce	Moray Council, Highlands and Islands Enterprise, Homes for Scotland, Scottish Forestry, Confederation of Forest Industries
Develop a campaign to promote use of quality locally grown timber in construction	Promote the features and benefits of locally grown timber for use in high value processes.	Increase the value of locally grown timber, generate additional revenue for businesses, develop new short supply chains in the sector.	Scottish Forestry Moray Chamber of Commerce	Moray Council, Scottish Forestry, Scottish Land and Estates, Landowners, Moray Chamber of Commerce
Prepare a woodland crofting/woodlots policy for Moray	Create new small-scale local timber growing, processing and manufacturing businesses	Grow the number of forestry related businesses in Moray, create new employment opportunities in the forestry sector	Moray Council	Scottish Forestry, Scottish Crofting Federation, Woodland Crofting Stakeholder Group

Actions	Description	Outputs / Outcomes	Lead	Delivery partners
Baseline visitor numbers to Moray's forest leisure and recreation sites	Install smart footfall and vehicle counters at Moray's primary leisure and recreation sites within Moray's woodlands	Inform future funding and infrastructure projects, enhance tourism offering	Forest and Land Scotland	Scottish Forestry, Moray Council, CENSIS
Develop tourism and recreational facilities within Moray's woodlands and forests	Develop a portfolio of priority capital projects across Moray's leisure and recreational forest areas as part of a review of the potential to create a special forest park or similar designation	Improve leisure and recreational amenity, increase visitor numbers	Forest and Land Scotland	Scottish Forestry, Moray Council, CENSIS
Improve the health and vitality of Moray's woodland ecosystems				
Source external funding to support delivery of biodiversity priorities alongside wider work on natural capital to provide an incentivised scheme to deliver multi benefit woodlands	Secure external funding to develop a scheme of top-up funding for new woodlands which provide significant benefits for biodiversity, landscape and/or health and well-being in line with the more detailed locational guidance. Funding to also be used for appointing an experienced Woodlands Officer who would act as principal coordinator and work with sector partners, to input to larger forestry applications and Forest Plans with the aim of achieving optimum outcomes in terms of community and biodiversity benefits	Improve biodiversity within Moray's woodlands, protect vulnerable and threatened habitats, creation of nature networks	Moray Council	Scottish Forestry, NatureScot, Scottish Government
Increase awareness of grants and assistance available for farmers and land managers for woodland planting and management	Develop a campaign to encourage increased uptake of Scottish Forestry grants for agroforestry and small farm woodlands grants. These include planting of hedgerows, trees and woodlands which can improve connectivity between small, isolated woodlands on farmland with resultant biodiversity benefits.	Improve biodiversity within and around agricultural areas, provide diversification opportunity for agricultural businesses, creation of nature networks	Scottish Forestry	Scotland's Rural College, SAC Consulting, National Farmers Union, NatureScot, Woodland Trust
Coordinate workshops, short courses and study visits for farmers and land managers	Related to the above action, enable farmers and land managers to get practical advice on planting trees to optimise biodiversity and land management objectives.	Improve biodiversity within and around agricultural areas, provide beneficial effects for farming operations (for example shelter for stock and reduced soil erosion on arable fields) and potential diversification opportunities for agricultural businesses	Scottish Forestry	Integrating Trees Network, Highlands and Islands Enterprise, UHI, Scotland's Rural College, SAC Consulting, National Farmers Union, Scottish Land and Estates, NatureScot, Woodland Trust

Page 435

Actions	Description	Outputs / Outcomes	Lead	Delivery partners
Ensure the biodiversity value of any trees proposed for removal within a proposed development is evaluated by an ecologist prior to decision	Any compensatory planting to optimise biodiversity enhancement. Developers to compensate any biodiversity loss, or loss of landscape character, accordingly and not just on the basis of woodland area removed.	Protect vulnerable and threatened woodland habitats, protection of landscape character	Moray Council	Scottish Forestry, NatureScot
Ensure delivery of NPF4 Policy 3 and Policy 11 in all development proposals	Ensure mitigation and enhancement plans from developers are maximised to significantly increase native woodland planting, adopting a landscape scale plan which extends beyond application site boundaries. Consideration should also be given to the management and removal of invasive non-native species.	Increase new woodland creation beyond that required for compensatory planting and maximise the biodiversity benefits of that woodland.	Moray Council	Scottish Forestry, NatureScot
Ensure all future woodland creation schemes contribute to the creation of nature networks	For any non-native conifer plantations it is a requirement for permanent mixed native species to also be planted as nature network to provide diverse habitat and refuge when clear-felling occurs	Increase biodiversity within existing woodlands, maximise benefits from new woodland planting	Scottish Forestry	Moray Council, NatureScot
Protect and expand Moray's existing native woodlands	Existing native woodlands are isolated and in decline through overgrazing and lack of management. An inventory of native woodlands under threat should be taken and a campaign to raise awareness and encourage owners to undertake management. If external funding is secured, top-up grants aimed at covering the costs of managing existing native woodlands could be prioritised.	Creation of nature networks, protection and enhancement of native woodland, increased biodiversity within existing woodlands	Scottish Forestry	Moray Council, NatureScot
Strengthen consideration of climate adaptation when assessing forest plan applications	Improve the resilience of woodlands to climate change by encouraging greater diversity of tree species and ensuring the right species are planted in the right location to mitigate against disease and wind throw. Fire risk may also need to be considered.		Scottish Forestry	Moray Council, NatureScot

Actions	Description	Outputs / Outcomes	Lead	Delivery partners
Foster greater connection between Moray's communities and woodlands				
Commission a study on the socio-economic benefits of new woodland creation and expanded community leasing and ownership	Provide an evidence base to support proposals for new community leasing/ownership and management of woodlands. Consider opportunities for community woodlands to generate income from selling timber.	Socially just use of land and assets, improved community engagement and participation, increased social enterprise activity	Moray Council	Scottish Forestry, Highlands and Islands Enterprise, tsiMORAY, Forest and Land Scotland, Scottish Land and Estates, Social Investment Scotland, Community Woodland Association
Provide opportunity for increased community ownership and management of woodlands	Build upon existing local expertise through the community groups involved in management of woodlands in Moray, by increasing the proportion of woodland in community ownership or management. Explore development of community right to buy initiative for portions of land in all new woodland creation, which could be linked to financial return or enhanced community use. Help communities identify and secure suitable land, and provide advice on the legal, financial and technical aspects of acquiring or leasing and managing community woodland	Socially just use of land and assets, improved community engagement and participation	Moray Council	Highlands and Islands Enterprise, tsiMORAY, Forest and Land Scotland, Scottish Land and Estates, Social Investment Scotland, Community Woodland Association
Establish a Regional Land Use Partnership	The partnership will help to optimise land use in a fair and inclusive way, meeting local and national objectives and supporting Scotland's just transition to net-zero	Socially just use of land and assets	Moray Council	Scottish Forestry, Highlands and Islands Enterprise, tsiMORAY, Forest and Land Scotland, Scottish Land Commission
Develop a voluntary forest ranger scheme and a programme of forest events and courses	Creation of a volunteer management programme to be coordinated by the Council, to help encourage more people to connect with local woodlands	Increased physical activity, improved health and wellbeing, custodianship of local woodlands	Moray Council	Scottish Forestry, Forest and Land Scotland, tsiMORAY
Provide increased opportunity for use of woodlands to improve health and well-being	Facilitate access for communities to use woodlands, especially for activities to promote connections with nature, green prescriptions and environmental education	Improved mental health and well-being, increased physical activity, community participation	Forestry and Land Scotland	Moray Council, Scottish Forestry, tsiMORAY

Actions	Description	Outputs / Outcomes	Lead	Delivery partners
Expand urban planting and creation of woodlands close to towns and villages	Ensure delivery of 'Scotland's Forestry Strategy' priority for: "encouraging an increase in tree canopy cover in urban areas". Delivering on the action will assist in raising awareness of the importance of urban trees for providing climate resilience to communities. The Council should continue to require larger scale housing applications to include woodland and orchards as part of landscape proposals with these designed to increase biodiversity and connectivity with surrounding woodlands, trees and hedgerows	Increased physical activity, improved health and wellbeing, climate adaptation, creation of nature networks	Moray Council	Scottish Forestry, NatureScot
Ensure provision of access points and connection into woodlands around settlements, especially linked to new housing or woodland developments	Encourage easy access to woodlands and forests to reap benefits for health and well-being of all sectors of the community. Focused upon urban woodland linking to existing or new housing developments, rather than planting on existing parkland	Increased physical activity, improved health and wellbeing, climate adaptation, creation of nature networks	Moray Council	Scottish Forestry, NatureScot
Facilitate expansion of Moray's network of forest-based leisure and recreation infrastructure	Increased engagement with land owners and public partners to facilitate an expansion of Moray's existing forest leisure and recreation infrastructure. Action to be led and informed by the previously commissioned socio-economic benefits study exploring the impact of Moray's existing forest resource.	Increased physical activity, improved health and well-being, socially just use of land and assets	Forestry and Land Scotland	Scottish Forestry, Moray Council, tsiMORAY

Page 438

Appendix:
Methodology for woodland creation sensitivity map

The following table sets out the methodology adopted for the mapping of woodland creation sensitivity (shown in Map 4) categorised as Sensitive, Potential with Sensitivities and Likely to be Unsuitable. Preferred Areas are identified as those outwith the constraint categories set out below:

Constraint	Information layer	How dealt with in the sensitivity map
Existing woodland	National Forestry Inventory Scotland 2022 supplemented with recent grant claims data from SF	Existing woodland excluded from analysis
	Native Woodland Survey of Scotland	
Agricultural land	Land Capability for Agriculture (1:50k) Class 3.2 and above	**Potential** but can be upgraded to **Preferred** by opportunity layers
	Carbon Rich Soils (Category 5)	**Potential with Sensitivities** Subject to detailed assessment of soils on a case-by-case basis
	Land Capability for Agriculture (1:50k) Class 1, 2 and 3.1	**Sensitive**
Urban area + proposed development	Housing allocations from Moray Local Development Plan 2020	Existing and planned settlement expansion excluded from analysis
Cultural heritage	Scheduled Monuments (with 20m buffer)	**Sensitive**
	Battlefields	
	Gardens and Designed Landscapes	
Natural heritage	Local Nature Reserves[9]	
	National Nature Reserves	
	Wetlands of International importance (RAMSAR)	
	Special Areas of Conservation/Special Protection Areas/Sites of Special Scientific Interest	
Carbon rich soils	Carbon rich soils (Category 6)	**Likely to be Unsuitable** (where sites can be shown through site soil survey not to be deep peat, they will be considered to fall within the **Potential** category)

9   Note that the findings of detailed assessment of Local Nature Reserves currently being undertaken by Envirocentre were not available when undertaking the map analysis.

Page 439

The table below sets out where opportunities have been identified for planting adjacent to settlements, creation of habitat networks and natural flood management and the approach taken in relation to agricultural land classification:

Opportunity	Information layer	How dealt with in the sensitivity map
Planting adjacent to settlements	1 km buffer around settlements identified in the Moray Local Development Plan 2020.	Upgrades Class 3.2 and above land to Preferred due to benefits
Woodland habitat networks	500 m buffer around existing woodland	Upgrades Class 3.2 and above land to Preferred due to benefits
Natural flood management	SEPA Natural Flood Management opportunities for run-off reduction (medium and high potential)	Upgrades Class 3.2 and above land to Preferred due to benefits
	SEPA Natural Flood Management opportunities for floodplain storage (medium and high potential)	Upgrades Class 3.2 and above land to Preferred due to benefits

Page 440

REPORT TO: SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024

SUBJECT: BIODIVERSITY STUDY

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

1. **REASON FOR REPORT**

1.1 To inform the Council of the contents and recommendations from a Biodiversity Study undertaken to provide evidence for the next Local Development Plan.

1.2 This report is submitted to Committee in terms of Section II (13) of the Council's Scheme of Administration relating to approval of Council Reports and Strategies of a corporate nature including Local Development Plans.

2. **RECOMMENDATION**

2.1 **It is recommended that the Council considers and notes the contents and recommendations within the Biodiversity Study and their relation to the next Local Development Plan (LDP), and;**

2.2 **Approve the approach outlined in 4.6 to outsource ecological expertise for larger or complex planning applications.**

3. **BACKGROUND**

3.1 Nature is being lost at unprecedented rates, one of the primary causes in Scotland being changes in land use. To address this, the National Planning Framework (NPF4) has rebalanced the planning system by placing climate change and biodiversity loss at the heart of development decisions. This and wider biodiversity issues have been discussed previously in other reports (see background papers).

3.2 Positive effects for biodiversity are secured across NPF4 policies and underpin the spatial strategy as a whole. Policy 3 in particular states that;

'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.'

3.3 The next LDP will therefore require strong evidence and policies to be in place in order to help nature recover.

4.   BIODIVERSITY STUDY

4.1 A detailed ecological study was commissioned to establish baseline evidence on the existing biodiversity of the area (**Appendix 1**). The study provided data that will be used to develop the LDP 2027 in line with the biodiversity policies set out in NFP4. The study is split into several topics summarised below.

Priority Species and Habitats

4.2 This desk based research identified species locations, priority areas and hotspots across Moray from a range of sources. The spatial and descriptive evidence draws this together, providing a baseline of what areas/ habitats/ species are of particular importance in Moray.

Site Reviews

4.3 Former Sites of Interest to Natural Science were reviewed for their potential to contribute to delivering NPF4 policies through the LDP. Of the 36 historical sites, many overlapped with statutory designated sites and so 9 were selected for field visits in order to determine what features may require protection. The ecologist's recommendations will inform the development of the Moray Nature Network and consideration of potential new land use designations.

Biodiversity Enhancements Through the Planning System

4.4 A gap analysis was undertaken of the current LDP and NPF4, with recommendations where these diverge. A similar analysis was undertaken for the various planning guidance available for NPF4, the current LDP and the North East Biodiversity Partnership (NESBiP) developer hub information on habitats and species important to the North East, with the key immediate recommendation being to promote the use of Nature Scot's Developing with Nature Guidance and for developments to more closely consider the site's local context when proposing biodiversity measures.

4.5 The study also examined the ability of current staff to address the significant changes that NPF4's strengthened biodiversity policies introduce, particularly the planned introduction of a biodiversity metric. Aberdeenshire Council are implementing such a tool already, and the Scottish Government is expected to develop a national tool roughly in time for the adoption of Moray's next LDP.

4.6 In order in order to implement NPF4's aspiration to secure positive effects for biodiversity, three options were explored; to upskill existing staff, recruit additional staff with ecological qualifications, and to outsource assessment to a consultant ecologist. In light of current budget pressures, a practical approach using existing budget will be taken, upskilling existing staff and outsourcing larger or more complex applications to an ecologist.

4.7 The key outcomes of the study that will impact on the LDP are to:
- Inform the development of planning guidance to aid interpretation of NPF4 in the local context
- Support the planning process to consider the local/ site context and ensure ecological coherence
- Highlight training and skills development requirements for planners and other council staff, councillors and developers
- Highlight the requirement for ecological expertise for larger or complex applications
- Inform a baseline nature network map that will be further developed following engagement with key stakeholders
- Inform the development of a biodiversity strategy that is due to be reported to Economic Development and Infrastructure Services Committee in early 2025.

5. SUMMARY OF IMPLICATIONS

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

Well-designed development integrating nature-based solutions provides multiple benefits that support the delivery of corporate plan priorities by; contributing to better places that promote wellbeing, provide for healthier lifestyles, enable people to connect with nature, support greater attachment to place and can enhance the economic value attributed to a development.

(b) Policy and Legal

Planning (Scotland) Act 2019
National Planning Framework 4
Nature Conservation (Scotland) Act 2004
Wildlife and Natural Environment (Scotland) Act 2011
Conservation (Natural Habitats, &c.) Regulations 1994
Wildlife and Countryside Act 1981 (as amended)
Scottish Biodiversity List
NESBiP habitat statements

(c) Financial implications

An ecological consultancy was contracted to undertake the study at a cost of £19,859 using the LDP revenue budget. Recommendations from the study, including external ecological advice noted in 4.6, will be implemented using existing budgets.

(d) Risk Implications

The council must be able to evidence biodiversity enhancement through the planning process and to justify planning decisions on this basis. Without following the study's recommendations set out in 4.4 the council may not be able to do this adequately.

(e)   Staffing Implications
Additional duties can be met at present using existing staff and budgets, however this has an impact on other duties of the climate change officers. It should be noted that this is a bare minimum approach that should be reviewed as further guidance, particularly on biodiversity metrics, is forthcoming.

(f)   Property
None.

(g)   Equalities/Socio Economic Impact
An Equality Impact Assessment is not required at this stage as the Proposed LDP will set out place based proposals and will be subject to a detailed EIA.

(h)   Climate Change and Biodiversity Impacts
The study provides robust evidence to support the council in delivering planning policies that will have direct and wide ranging impacts on climate change and biodiversity.

(i)   Consultations

The Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Head of Financial Services, the Democratic Services Manager, and the Equalities Officer have been consulted and comments received have been incorporated into the report.

6.   CONCLUSION

6.1   That the Council considers and notes the contents of this report and approves the recommendation to outsource large and complex cases to an ecologist.

envirocentre

Moray Council
Biodiversity Study

January 2024

CONTROL SHEET

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Project Title: Moray Council
Report Title: Biodiversity Study
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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

A   Desk Study Consultation Summary
B   Desk Study Results Plans
C   Summary OF NESBreC Records
D   SINS Plans
E   Opportunities for Nature Network Connections
F   NPF4 Gap analysis

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
   o   Conduct a desk study to identify priority species and habitats within the LDP area.
2. Site Reviews
   o   Review data available relating to historically locally designated Sites of Interest to Natural Science (SINS).
   o   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.
   o   Provide recommendations relating to the importance of each site for safeguarding through planning and opportunities to restore any degraded habitats.
   o   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
   o   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.
   o   Provide examples of current 'best practice' regarding biodiversity enhancement through the planning system from other Scottish Local Authorities.
   o   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

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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

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[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:

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[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)

- o   Sites of Special Scientific Interest (SSSIs)
        - o   Special Protection Areas (SPAs)
        - o   Special Areas of Conservation (SACs)
        - o   Local Nature Reserves (LNRs)
        - o   Marine Protected Areas (MPAs)
- NatureScot Open Data[11] for Habitats and Species:
        - o   Habitat Map of Scotland
        - o   Carbon and Peatland Map Scotland 2016
        - o   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.

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[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

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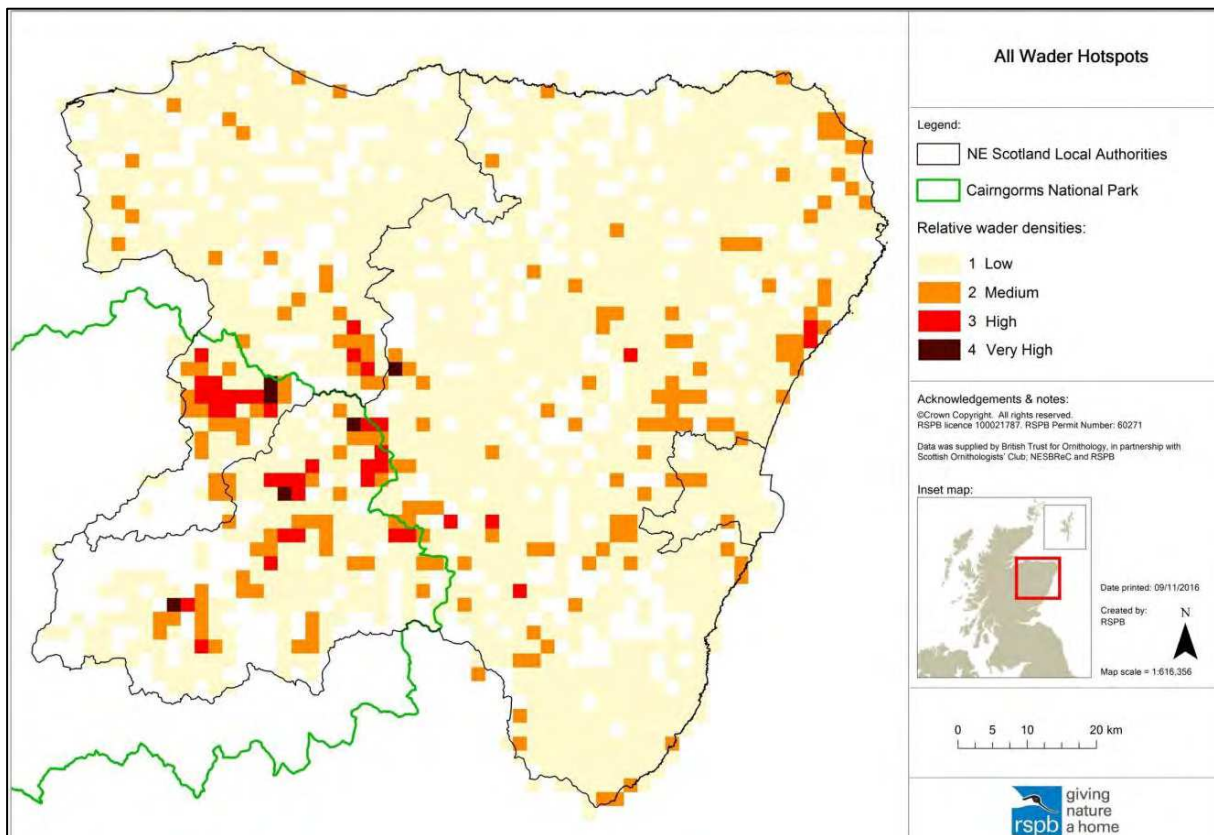
Figure 2-1: Map showing the combined relative densities of all five wader species.

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

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[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.

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[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 | Portknock ie - 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 |
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									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 agriculural 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 Towanree f	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	Maggieknockater	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 | Craibstone 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 | Craigman cie (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

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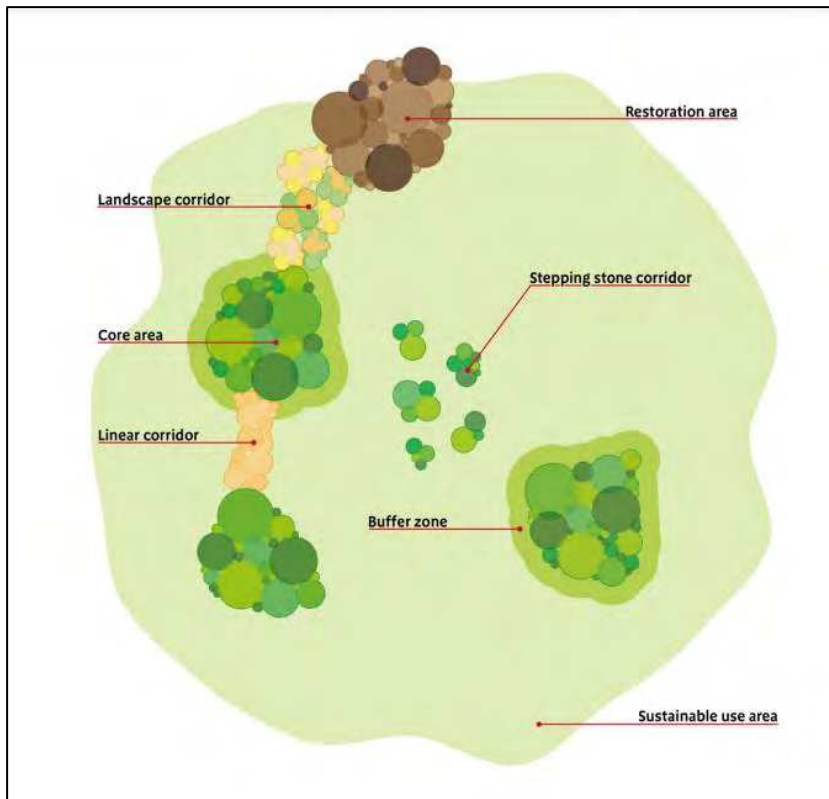
Figure 3-1: Components of an ecological network. Image Source: Making Space for Nature Report.

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.

Moray Council LDP Supporting Guidance

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;*

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[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"*

<u>NatureScot Developing with Nature Guidance</u>

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.

<u>NESBiP Developers Hub</u>

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*).

<u>Recommendations</u>

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).

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[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

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[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:

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[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.

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[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)

s.		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.

APPENDICES

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	-	-	-

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T: 0141 341 5040 E: info@envirocentre.co.uk
W: www.envirocentre.co.uk
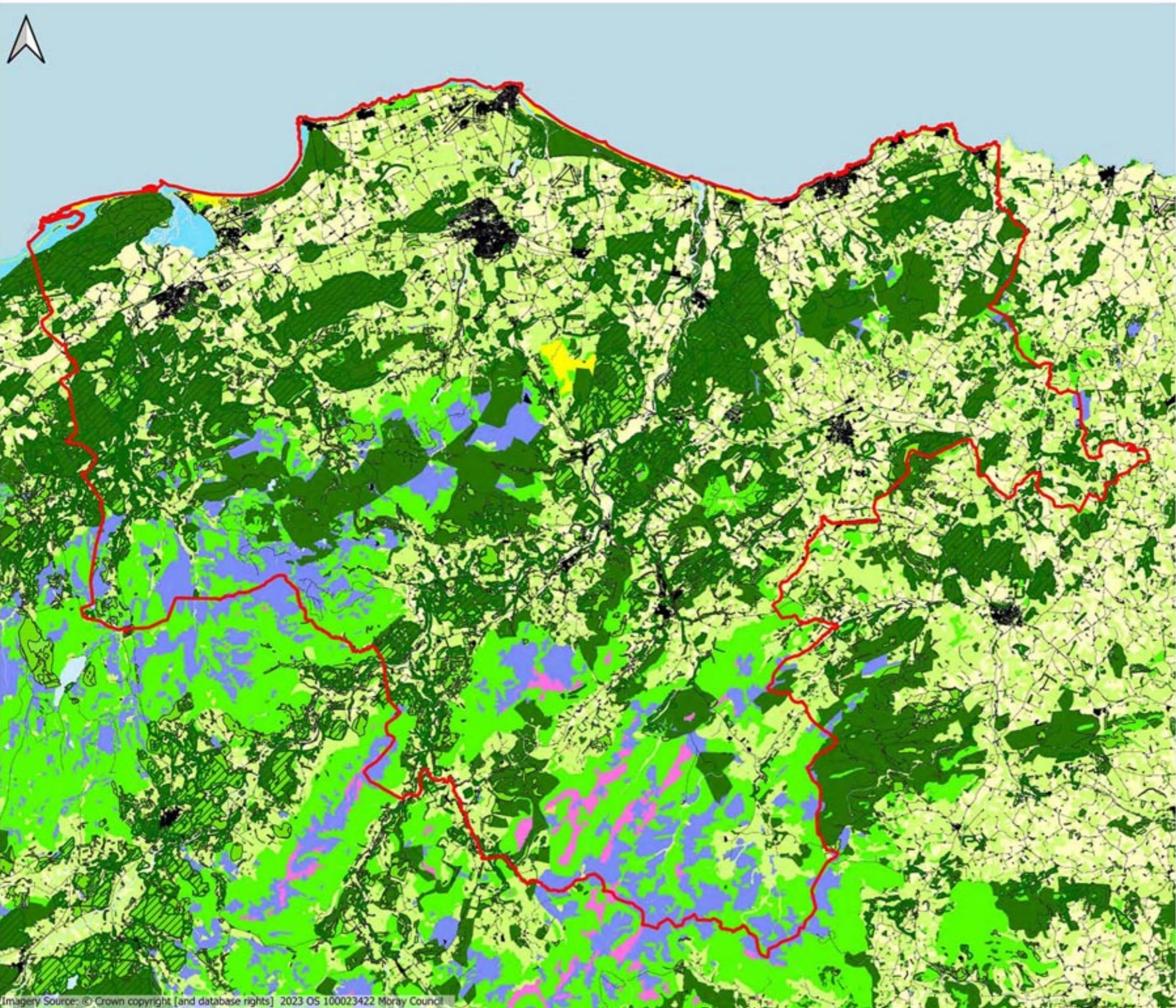
Imagery Source: © Crown copyright [and database rights] 2023 OS 100023422 Moray Council

Legend

Moray LDP Boundary

HabMoS EUNIS Base layer

- A - Marine habitats
- B - Coastal habitats
- C - Inland surface waters
- D - Mires, bogs and fens
- E - Grasslands and lands dominated by forbs, mosses or lichens
- F - Heathland, scrub and tundra
- G - Woodland, forest and other wooded land
- H - Inland unvegetated or sparsely vegetated habitats
- I - Regularly or recently cultivated agricultural, horticultural and domestic habitats
- J - Constructed, industrial and other artificial habitats
- X - Marine habitats
- X - Habitat complexes
- Urdata

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	-	-	-

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Page 495

Legend
- Moray LDP Boundary
- Ancient Woodland
- Native Woodland

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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
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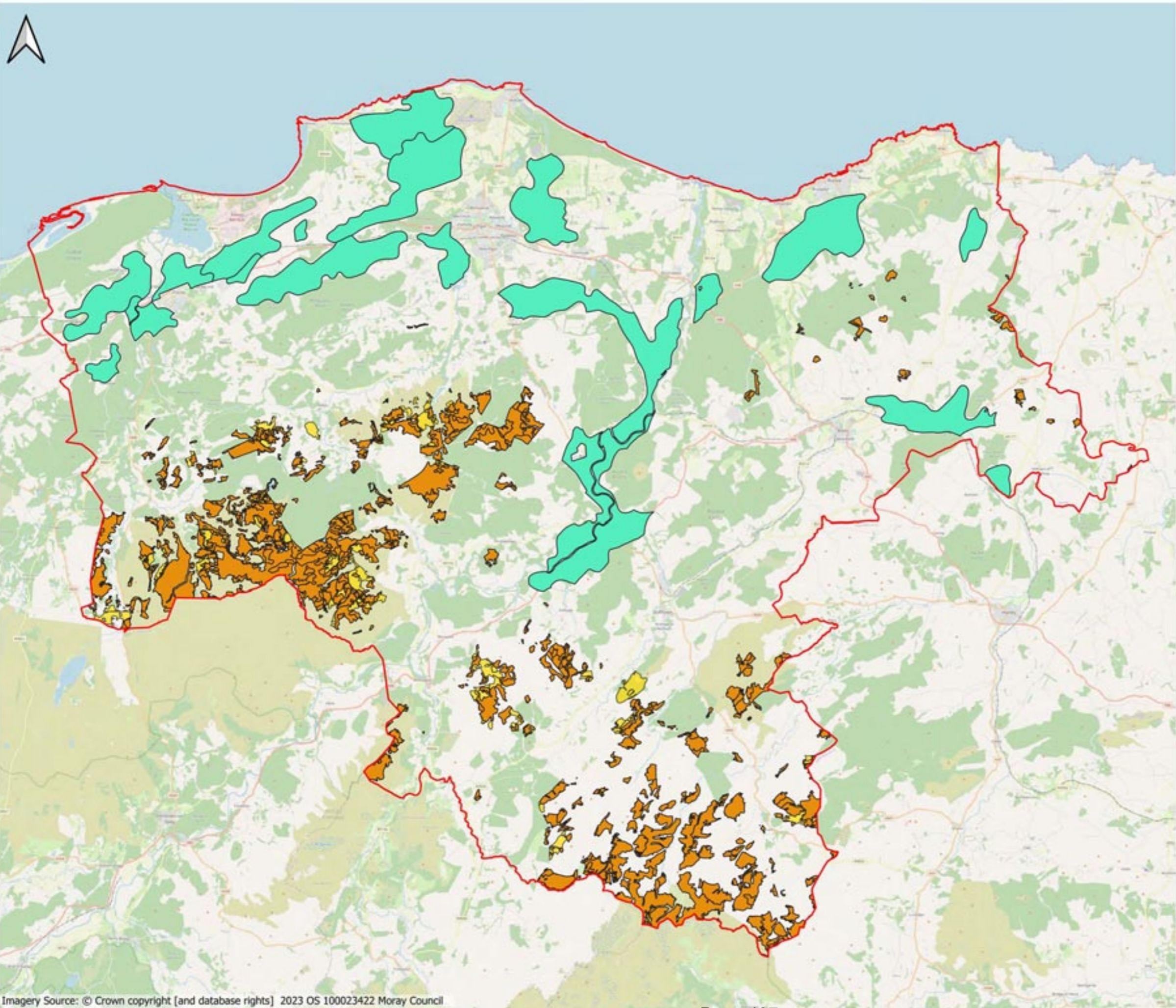
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Legend

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

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Project
Moray Council Biodiversity Study

Title
Soils Plan

Status
FINAL

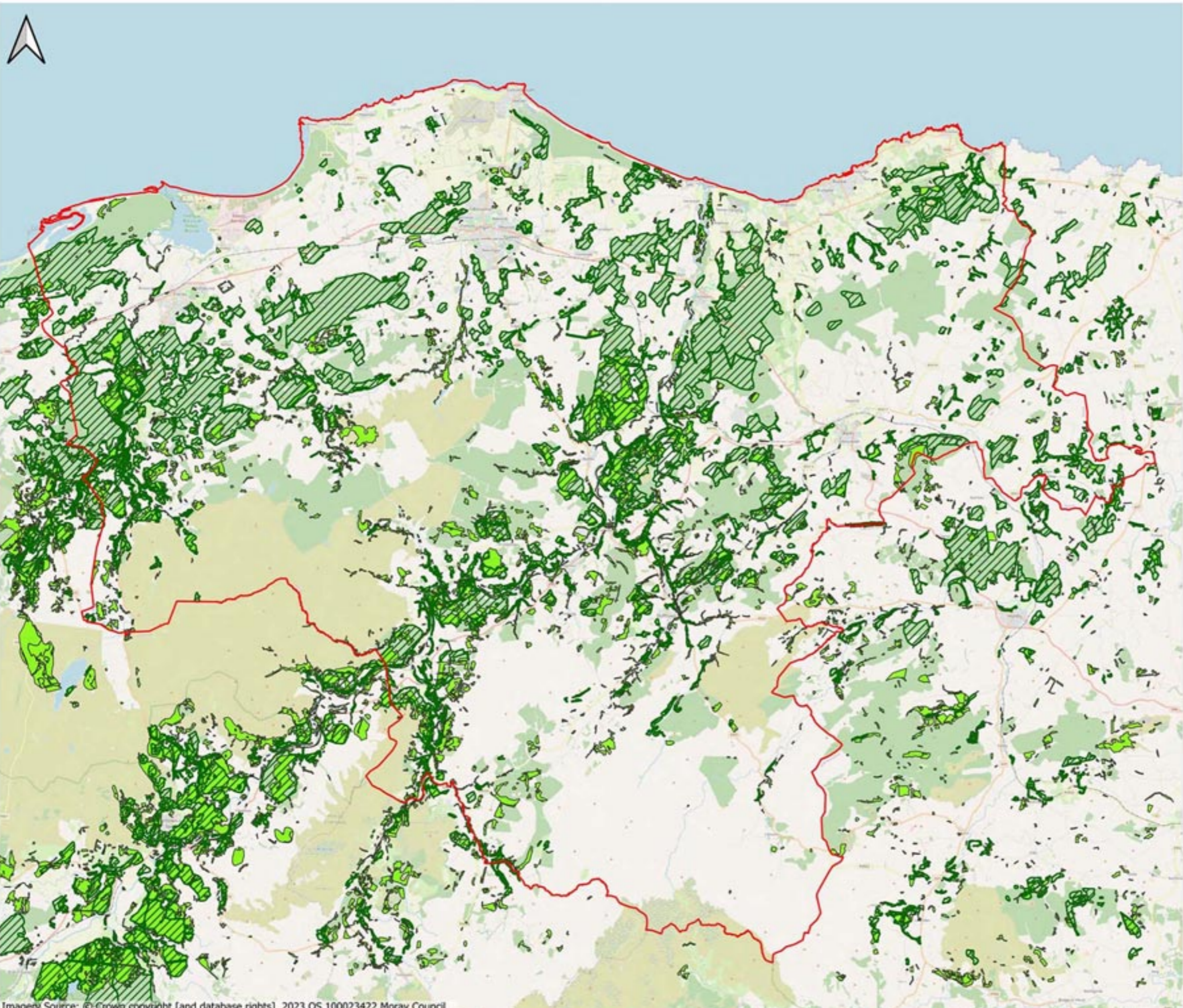| Drawing No.	Revision	Date
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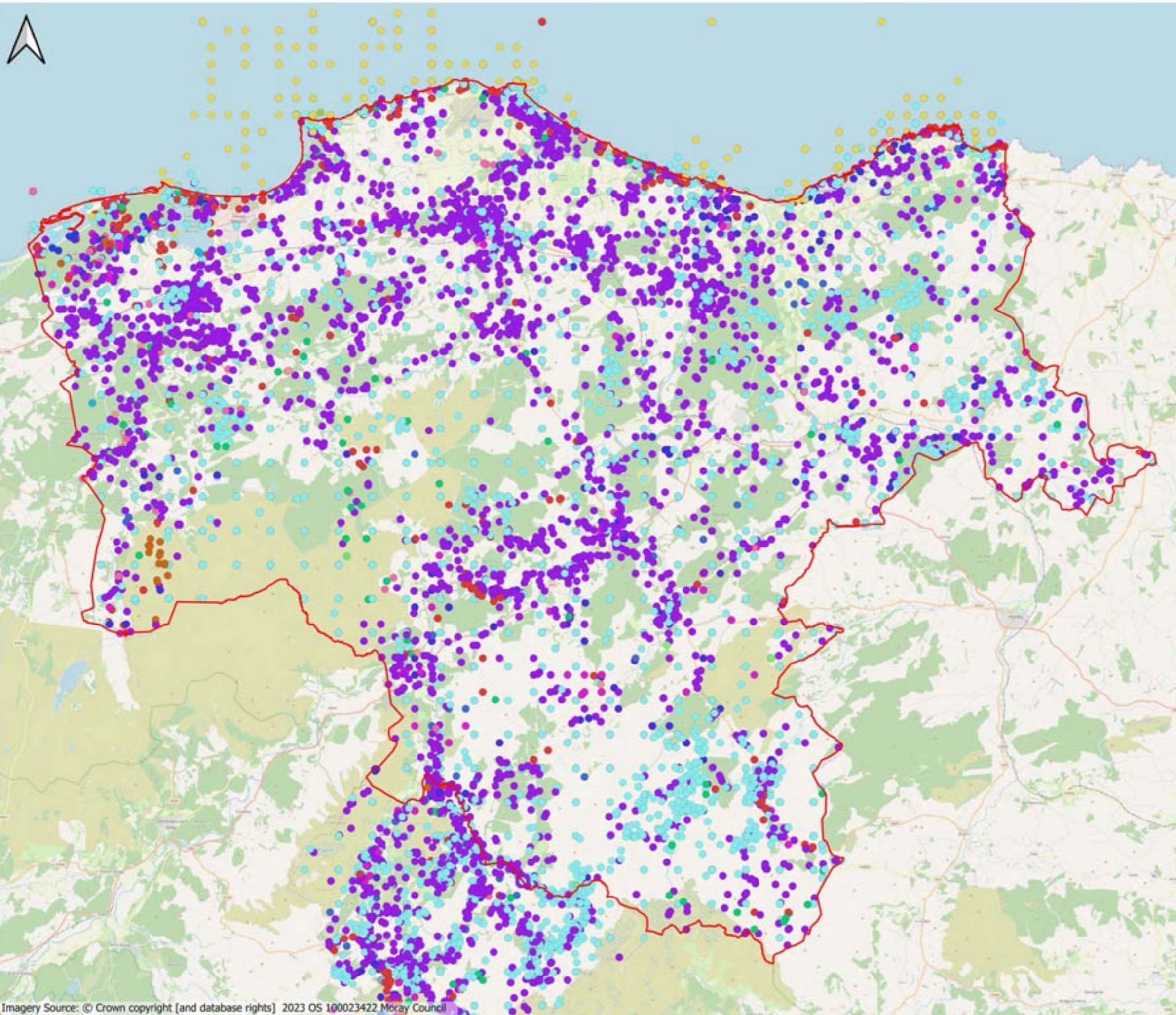
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Legend

Moray LDP Boundary

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

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Client
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Project
Moray Council Biodiversity Study

Title
Moray Designated Species Plan

Status
FINAL

Drawing No.	Revision	Date
378201-GIS023	A	19 Jan 2024
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Page 498

Legend

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

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Client
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Project
Moray Council Biodiversity Study

Title
Locally Important Species Plan

Status
FINAL

Drawing No. 378201-GIS024	Revision A	Date 19 Jan 2024
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Scale
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Moray LDP Boundary

● Hairy Wood Ant

● Scottish Wood Ant

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Client
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Project
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Title
Cairngorms Priority Species Plan

Status
FINAL

Drawing No. 378201-GIS025	Revision A	Date 19 Jan 2024
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Scale
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Rev	Date	Amendment	Initials
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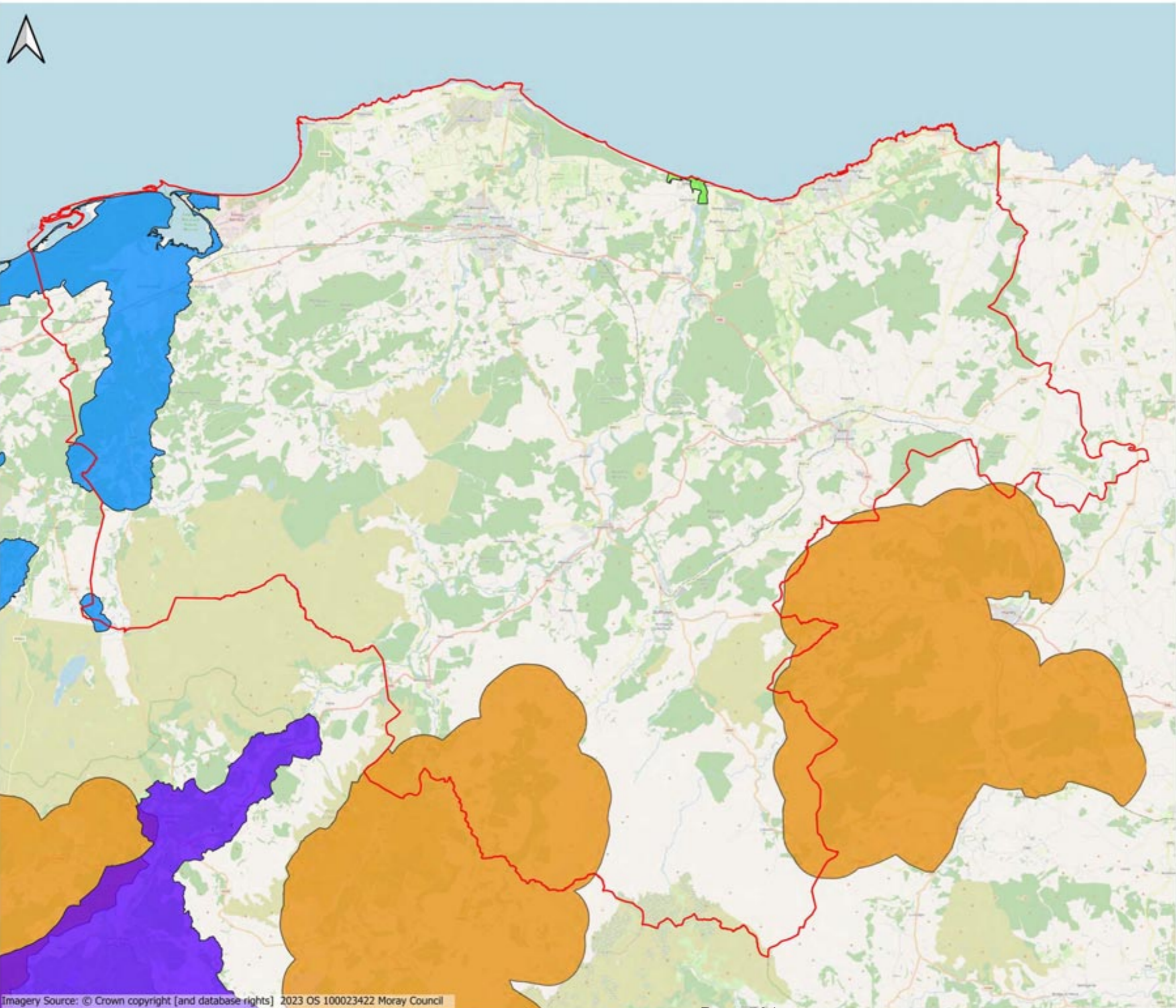
Legend

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

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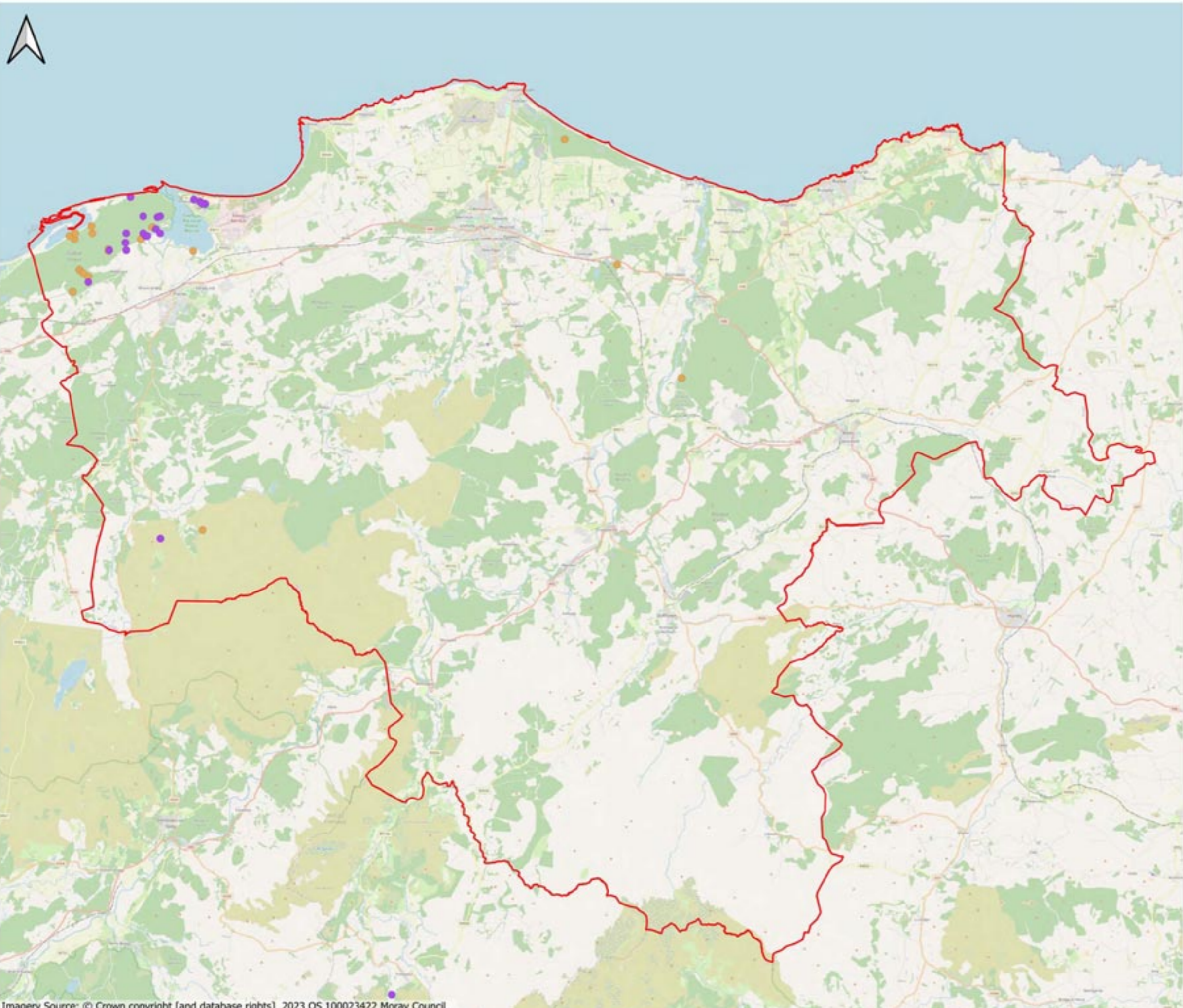Moray Council Biodiversity Study

Title
Other Important Areas for Species

Status
FINAL

Drawing No.	Revision	Date
378201-GIS027	A	19 Jan 2024
Drawn	Checked	Approved
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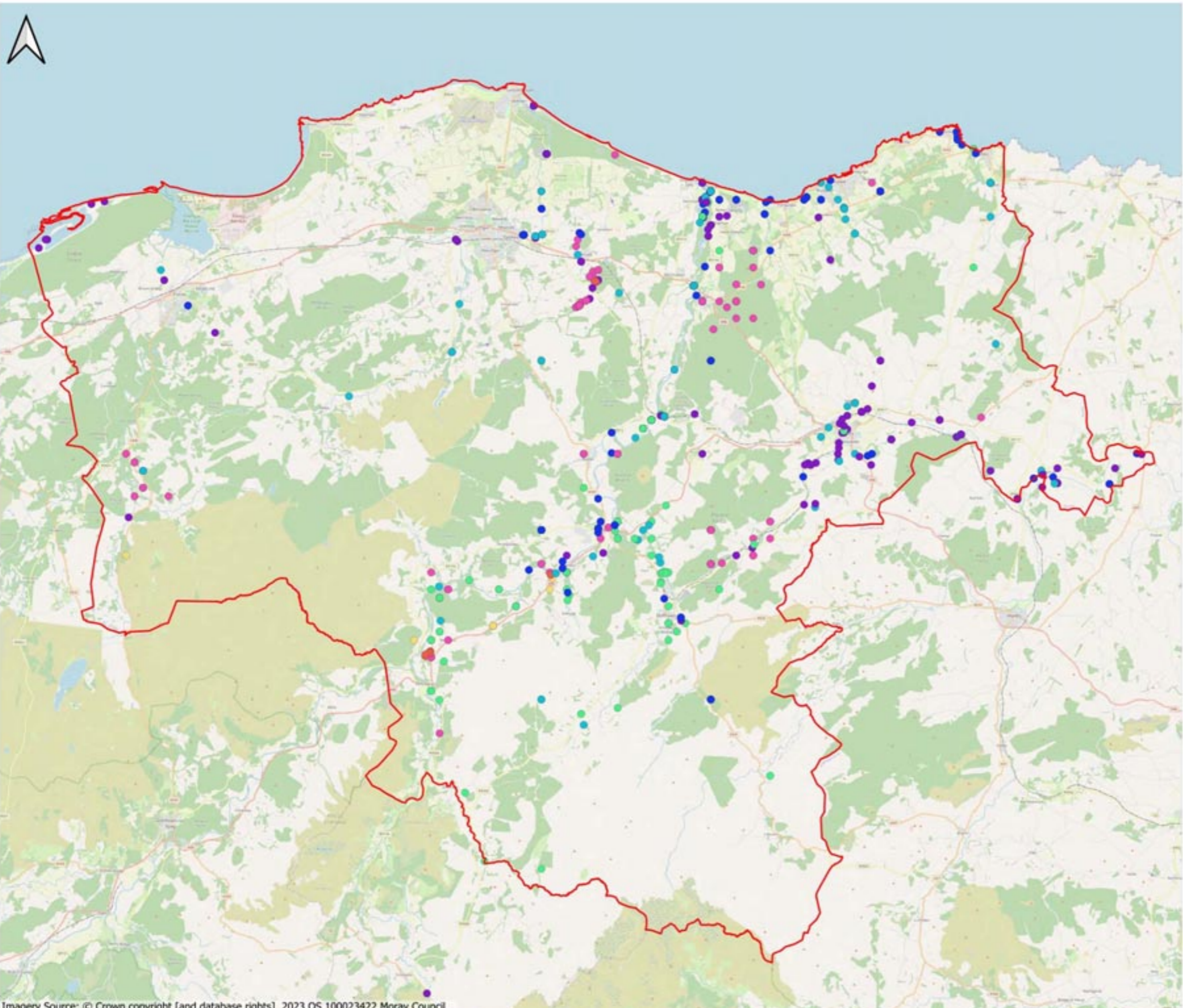
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Legend

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

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Client
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Project
Moray Council Biodiversity Study

Title
Invasive Non-Native Species Plan

Status
FINAL

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

Scale
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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

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[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

Legend

Local Development Plan Area

SINS

No Site Visit
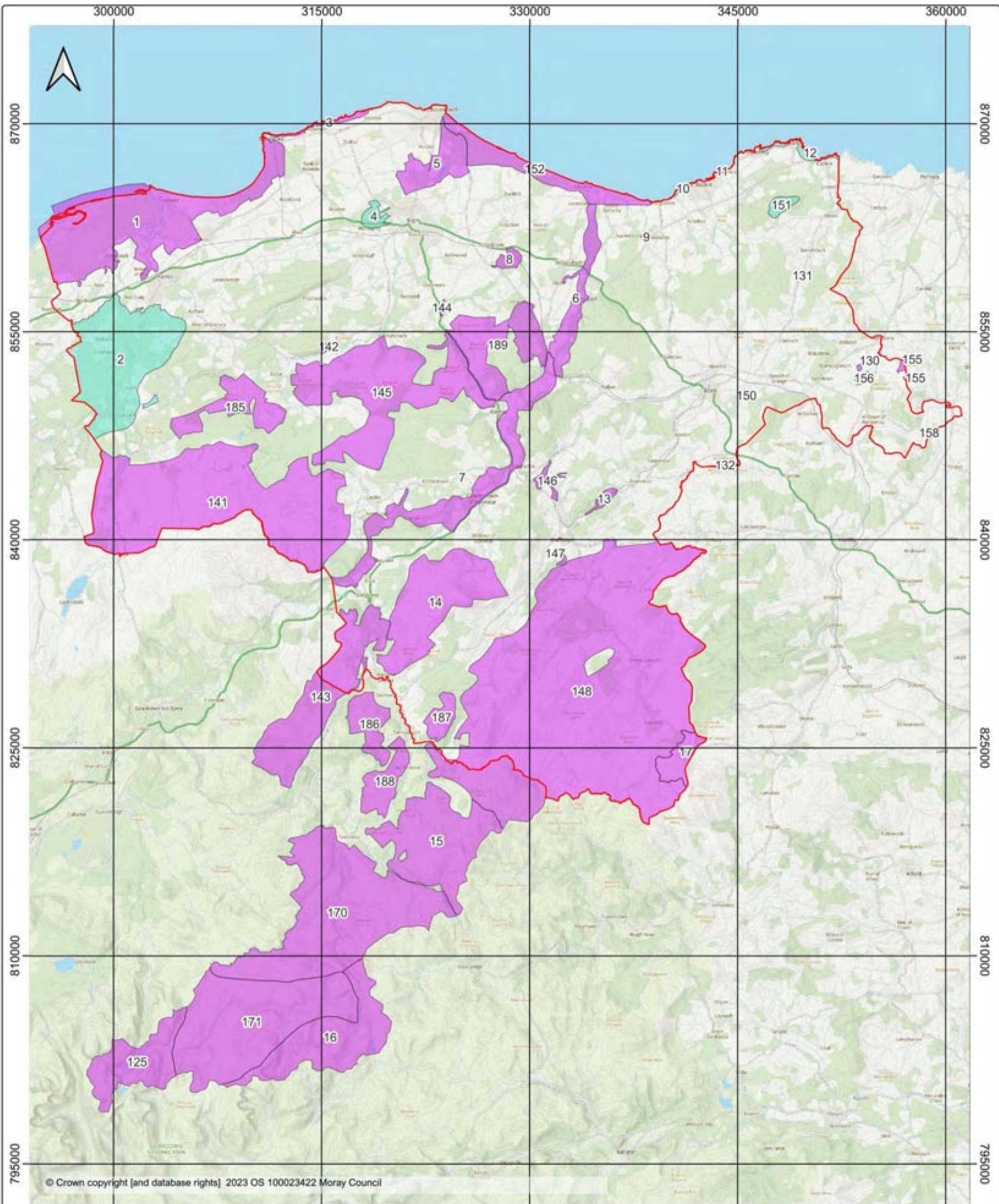
Site Visit

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Do not scale this map

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	Checked	Approved
MM	JB	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 JB	**Checked** SF	**Approved** MM

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

Rev	Date	Amendment	Initials
-	-	-	-

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Labels on map: 11, 14   10, 11, 14   12, 13, 37

Imagery Source: Bing Maps, Image courtesy of Ordnance Survey © 2023 TomTom

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
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Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom

340800   341600

865600   864800

BUCKIE

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
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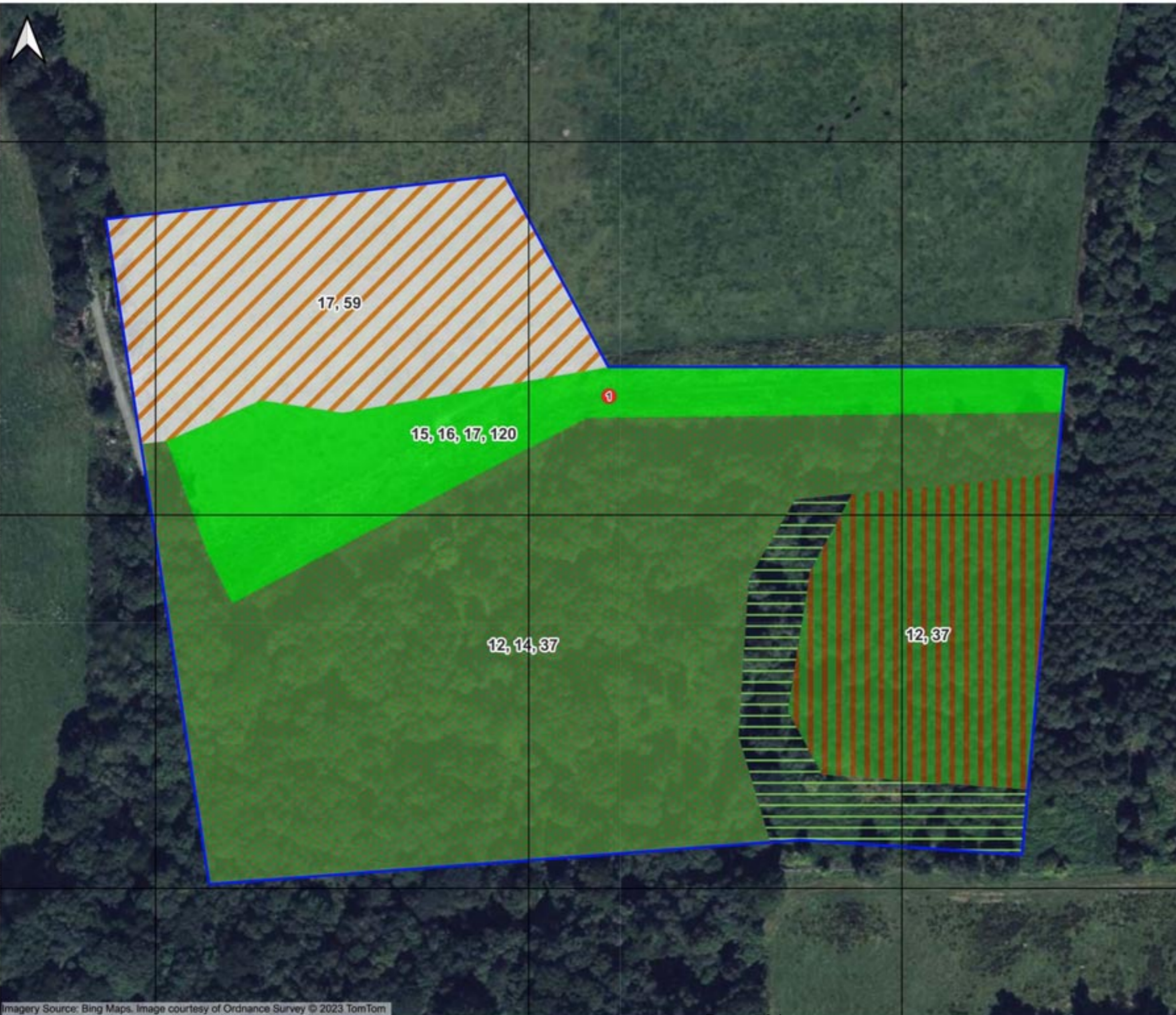E: info@envirocentre.co.uk W:www.envirocentre.co.uk

10, 12, 16, 37

Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom

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
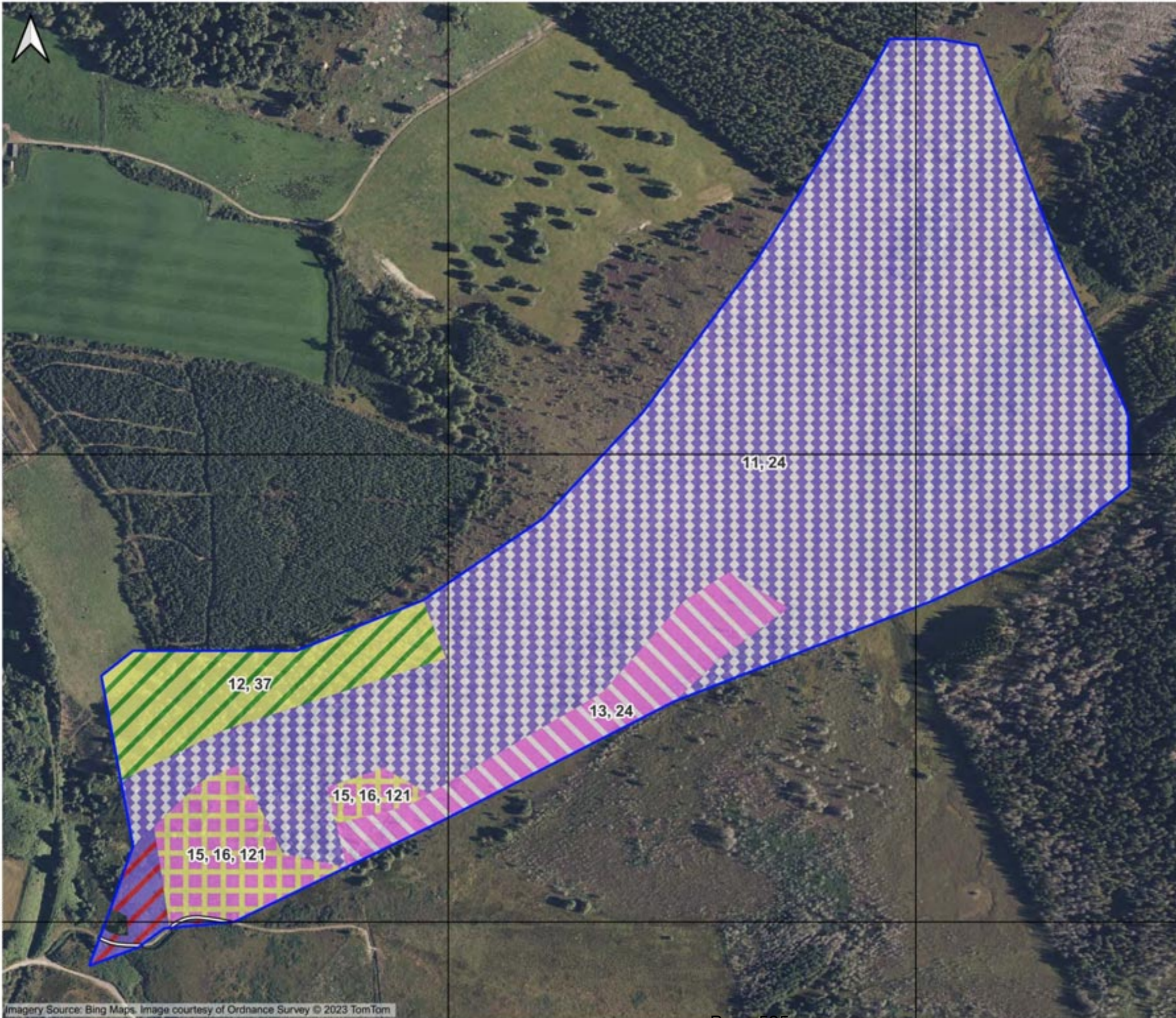
Title
Craigmancie (Part) UKHab Plan

Status
FINAL

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

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

Rev	Date	Amendment	Initials
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17, 59

15, 16, 17, 120

12, 14, 37

12, 37

Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom

847800

847700

847600

358700

358800

358900

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 JB	**Checked** SF	**Approved** MM

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

Rev	Date	Amendment	Initials
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850000

849500

302500

303000

11, 24

12, 37

13, 24

15, 16, 121

15, 16, 121

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. 378201-GIS018	Revision -	Date 03 Oct 2023
Drawn JB	Checked SF	Approved MM

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

Rev	Date	Amendment	Initials
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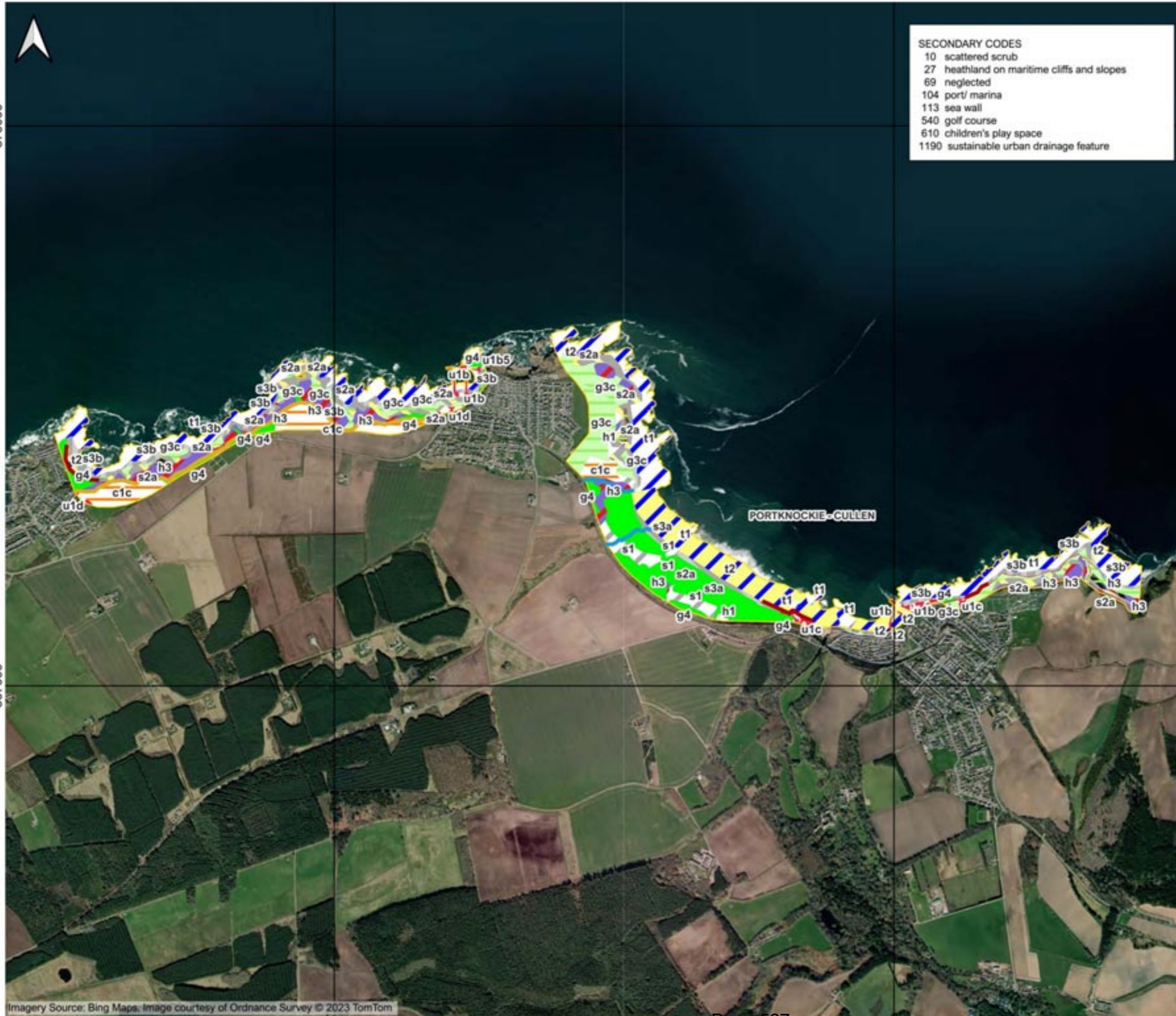
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Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom

Portknockie - Cullen UKHab Plan

SECONDARY CODES
10 scattered scrub
27 heathland on maritime cliffs and slopes
69 neglected
104 port/ marina
113 sea wall
540 golf course
610 children's play space
1190 sustainable urban drainage feature

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
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-			

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PORTKNOCKIE - CULLEN

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. 378201-GIS021	Revision -	Date 19 Jan 2024
Drawn JB	Checked SF	Approved MM

Scale
1:4,500 @ A3

0 50 100 150 m

Rev	Date	Amendment	Initials
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Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom
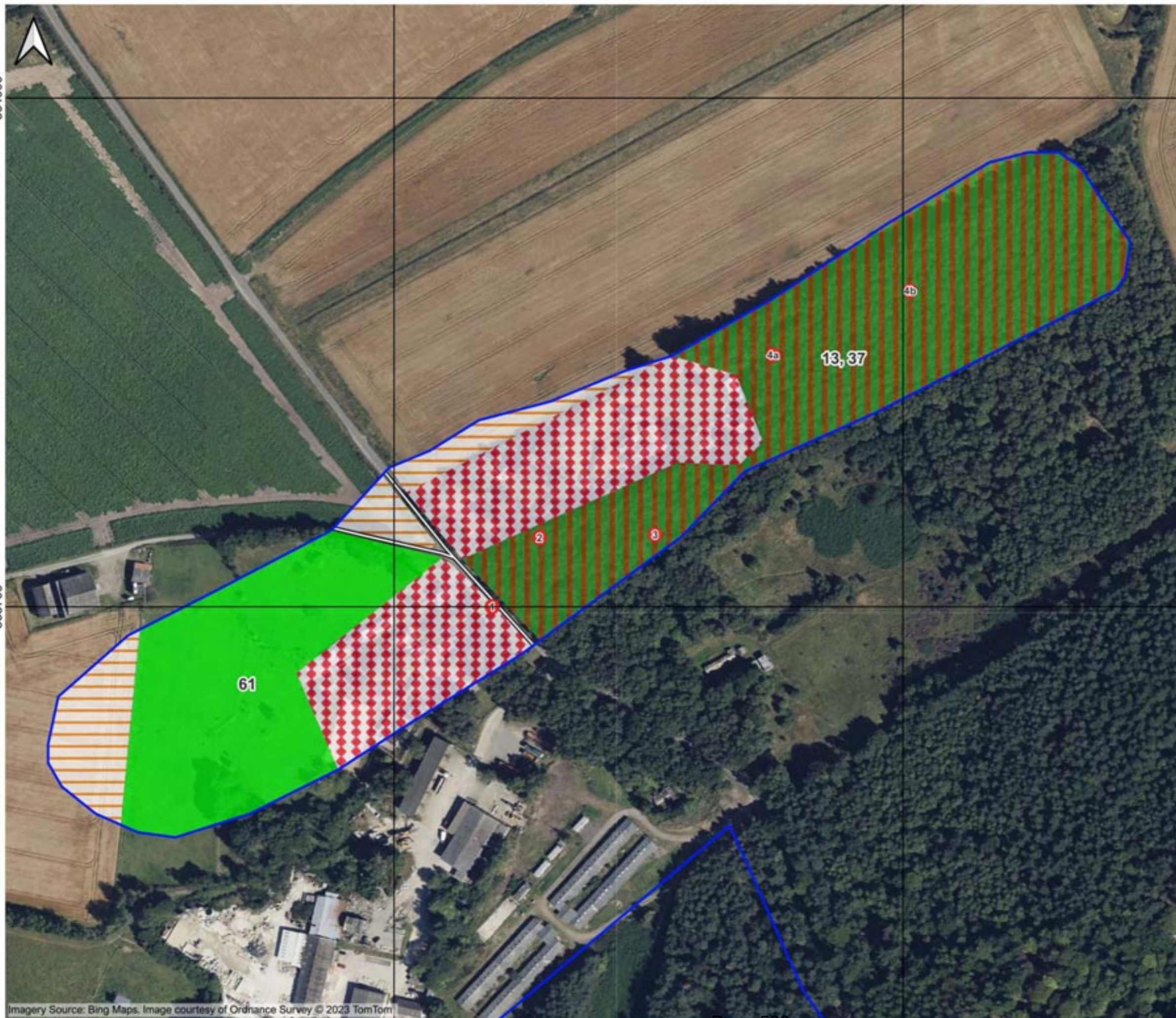
Legend

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

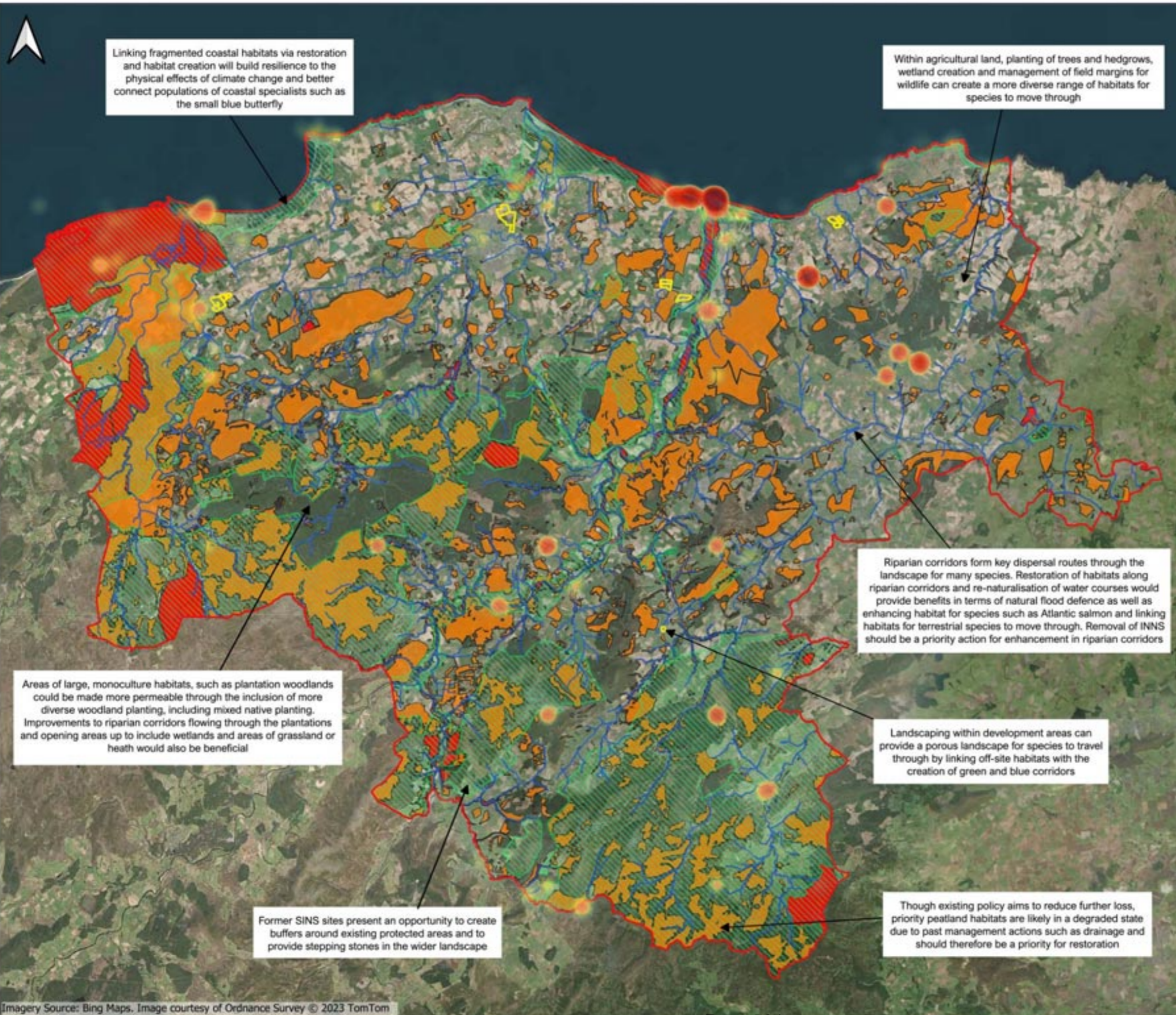| Drawing No.	Revision	Date
378201-GIS020	-	19 Jan 2024
Drawn	Checked	Approved
JB	SF	MM

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

Rev	Date	Amendment	Initials
-			-
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Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom

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

Linking fragmented coastal habitats via restoration and habitat creation will build resilience to the physical effects of climate change and better connect populations of coastal specialists such as the small blue butterfly

Within agricultural 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

Riparian corridors form key dispersal routes through the landscape for many species. Restoration of habitats along riparian corridors and re-naturalisation of water courses would provide benefits in terms of natural flood defence as well as enhancing habitat for species such as Atlantic salmon and linking habitats for terrestrial species to move through. Removal of INNS should be a priority action for enhancement in riparian corridors

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

Landscaping within development areas can provide a porous landscape for species to travel through by linking off-site habitats with the creation of green and blue corridors

Former SINS sites present an opportunity to create buffers around existing protected areas and to provide stepping stones in the wider landscape

Though existing policy aims to reduce further loss, priority peatland habitats are likely in a degraded state due to past management actions such as drainage and should therefore be a priority for restoration

Imagery Source: Bing Maps. Image courtesy of Ordnance Survey © 2023 TomTom

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** JB | **Checked** MM | **Approved** DB |

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

Rev	Date	Amendment	Initials
A	-	-	

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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 1000m² 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 |

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[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]

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[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 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.
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.	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.

REPORT TO: SPECIAL MEETING OF MORAY COUNCIL ON 24 APRIL 2024

SUBJECT: MORAY LOCAL DEVELOPMENT PLAN 2027 EVIDENCE
             REPORT

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

1.   REASON FOR REPORT

1.1   This report asks Council to approve the Evidence Report for the Moray Local
Development Plan 2027 and delegate authority to the Head of Economic
Growth and Development to submit to the Scottish Ministers for the
Gatecheck.

1.2   This report is submitted to Committee in terms of Section III (E) (2) of the
Council's Scheme of Administration relating to the review and preparation of
Local Development Plans.

2.   RECOMMENDATION

2.1   **It is recommended that the Council:**

(i)   **Considers and approves the Evidence Report for the Moray Local
Development Plan 2027 (LDP27);**

(ii)   **Note that the Strategic Environmental Assessment (SEA) Scoping
Report will be submitted to the SEA Gateway;**

(iii)   **Delegates authority to the Head of Economic Growth and
Development to update the Evidence Report to include references
for core documents and other relevant evidence, and consultees;
and**

(iv)   **Delegates authority to the Head of Economic Growth and
Development to submit the Evidence Report to the Scottish
Ministers via the Scottish Government Division for Planning and
Environmental Appeals (DPEA) for the Gatecheck.**

3. BACKGROUND

3.1 The Planning (Scotland) Act 2019 (hereafter, referred to as the 'Act') introduced changes to the LDP preparation process following the Transforming Planning programme. The Act introduced two key changes to the stages of the LDP preparation process; the Evidence Report and the Gatecheck. The key stages of the new process are set out below:

- Evidence Report: Prepared by the Planning Authority and sets out the baseline evidence to inform what the LDP is to plan for. The Report provides a summary of what the evidence means for the new LDP and is not expected to contain all the detail of the evidence. The Evidence Report must be approved by Moray Council before being formally submitted to the Scottish Ministers.
- Gatecheck; Following submission of the Evidence Report, the Scottish Ministers will appoint a Reporter to carry out an independent assessment of the Evidence Report. The purpose of the Gatecheck is to assess the sufficiency of the evidence base to prepare the new LDP; it is not a mini or early Examination of the evidence. It aims to reduce the level of debate arising at the later stage of Examination.
- Proposed Plan: Identifies where new development will take place and where it should not through land allocations and local policies in accordance with the Regional Spatial Strategy (RSS) and National Planning Framework 4 (NPF4). The LDP is to be 'place-based' with greater emphasis on maps, development briefs and masterplans and adopt an infrastructure first approach to support delivery.
- Examination: An independent examination of any unresolved issues arising from the Proposed Plan is carried out by a Reporter appointed by the Scottish Ministers. The Examination process is not an opportunity to revisit the Evidence Report.
- Adoption: Following the publication of any modifications arising from the Examination the Council can proceed to adopting the LDP where, along with NPF4, it becomes the statutory development plan of the Council.

3.2 The Evidence Report for the new Moray Local Development Plan (LDP) is set out in **Appendix 1**. The Report is topic based and grouped into policy headings that reflect NPF4. The information is presented in a 'Schedule' format similar to that suggested in the Scottish Government Local Development Planning Guidance. This provides a systematic, consistent and transparent approach to the analysis and interpretation of the evidence.

3.3 Along with the 'Schedules' the Evidence Report includes a summary of the appropriateness of the LDP2020 spatial strategy, policies and allocations; adherence with the legislative requirements of the Act; main issues arising from the evidence for the new LDP; engagement statement to explain how the Council has sought stakeholder views in line with legislative requirements and how these have been taken into account; position statement providing an overview of the evidence and areas of agreement and dispute; and, checklists that will be used to assess future bids for sites.

3.4   Scottish Government guidance on Local Development Planning makes it clear that a proportionate approach is to be taken by Planning Authorities when considering the sufficiency of evidence. This means that it is not expected that the Evidence Report will be a compendium of all available information and that Planning Authorities can decide which information is relevant to the LDP in each case. A significant volume of work has been undertaken to inform the new LDP. This has included the preparation of a number of plans, strategies and studies which have been presented to various Committees of the Council along with those which are the subject of separate reports presented to this special meeting of Moray Council.

3.5   The Gatecheck is a new and untested process and Moray Council is one of the first planning authorities to submit an Evidence Report to the Gatecheck. Meetings and regular dialogue have taken place with the DPEA regarding the format of the Evidence Report and proportionality of the evidence. The Evidence Report set out in **Appendix 1** is considered to reflect these discussions and contain a proportionate level of evidence to prepare the new LDP.

3.6   The Evidence Report Schedules contain 'statements of agreement and disputes' on the sufficiency of the evidence from stakeholders. Where there is agreement, the Reporter is unlikely to consider the issue in depth. However, where there is a dispute, the Reporter will consider the different viewpoints and come to a view. It is anticipated that any assessment of disputes will be carried out via written submissions rather than hearings. The Reporter will also identify any gaps in evidence, and if so, request further information as part of the Gatecheck.

3.7   A small number of key stakeholders have disputed the sufficiency of the evidence for the new LDP or suggested that further evidence is included. The disputes relate to Housing and Infrastructure and have been raised by Homes for Scotland, SEPA and NatureScot have suggested that further evidence is required to inform the new LDP on biodiversity and natural places, however, it is not considered that this level of evidence is proportionate or necessary. Consultation with SEPA also highlighted that a Strategic Flood Risk Assessment was required. This is currently being worked on and when agreed with SEPA will be submitted with the Evidence Report. The Council's recommended response is set out in the Schedules of the Evidence Report.

3.8   The Position Statement provides an overview of the evidence and areas of agreement and dispute for each Schedule of the Evidence Report. The Position Statement also sets out how the evidence relates to NPF4 policy areas. The Position Statement demonstrates how the Evidence Report as a whole provides sufficient evidence to enable the preparation of the new LDP.

3.9   The Evidence Report is a snapshot in time. The evidence may change between the time the Evidence Report is submitted to the Gatecheck and the preparation of the Proposed Plan. The Proposed Plan will be based on the most up-to-date evidence at the time.

3.10 A Strategic Environmental Assessment (SEA) is a statutory requirement for a LDP. It aims to ensure that the environment is a primary consideration in the preparation of the LDP and that steps are taken to avoid, mitigate or reduce significant adverse effects, where possible, or enhance positive ones. An SEA Scoping Report has been prepared alongside the Evidence Report. The SEA Gateway which consists of the Consultation Authorities of NatureScot, SEPA and Historic Environment Scotland are to receive the SEA Scoping Report when the Evidence Report is submitted to the Gatecheck.

4. LDP2020 SPATIAL STRATEGY, POLICIES AND ALLOCATIONS

4.1 The Evidence Report is to evaluate whether the LDP2020 has delivered on its outcomes, and allocations, and consider the appropriateness of the previous spatial strategy. The LDP2020 was informed by 9 main land use issues identified as part of the Main Issues Report (MIR) in 2018. The LDP2020 has been monitored on an annual basis since its adoption in July 2020 to examine whether it is addressing these 9 main issues.

4.2 A summary of the evaluation of the spatial strategy, policies and designations is set out in Section 2 of the Evidence Report. Further detail is provided within the LDP2020 Monitoring Reports for 2020-21 and 2021-23 which are included on the list of evidence to be submitted to the Scottish Ministers. Overall, the LDP2020 policies and land allocations are delivering the spatial strategy as intended with the majority of development taking place in the primary and secondary growth areas of Elgin, Buckie and Forres. Growth in the Tertiary Growth areas of Lossiemouth, Keith, Fochabers, Mosstodloch and Aberlour have been more modest however, Moray Growth Deal funding will help to unlock sites with viability challenges in Speyside. A review of allocated sites will be undertaken for the new LDP to determine whether existing site designations need to be removed and replaced with alternatives if there has been little to no progress on delivery.

5. MAIN ISSUES ARISING FROM THE EVIDENCE

5.1 The main issues arising through the Evidence Report to be addressed through the new LDP are set out in detail in Section 3 of the Evidence Report. Overall, the new LDP will need to address:

- Demographic challenges of an ageing population and increase in smaller households;
- Risks associated with climate change such as coastal erosion and more extreme weather events for example, through nature-based solutions and the location and adaptation of buildings and infrastructure;
- Delivery of biodiversity enhancements and improvements such as the establishment of a Nature Network and building on natural capital assets such as peatland restoration, woodland creation and natural flood management;
- Supporting the outcomes of the Council's Hydrogen Strategy including identifying sites for hydrogen generation facilities;

- Increasing pressure for renewable energy developments including windfarms, anaerobic digestion plants, Battery Energy Storage Systems (BESS) and the associated infrastructure for the National Grid and their impact on the landscape and serviced employment land;
- Supporting the regeneration and changing role of town centres including the delivery of town centre living and redevelopment and refurbishment of vacant buildings and brownfield land;
- An available supply of housing sites to ensure there is a deliverable housing land pipeline for the Local Housing Land Requirement and addressing local need for affordable and specialist housing;
- Identification of a significant level of additional land for business and industry across Moray and addressing viability issues with the delivery of serviced sites;
- Supporting and coordinating an infrastructure first approach between infrastructure providers to facilitate development;
- Identification of transport infrastructure necessary to facilitate development and addressing the outcomes of the Scottish Government's A96 corridor review;
- Continuing to deliver high quality places that have multiple benefits for climate resilience, nature and health and wellbeing.
- Approaches to Local Living that reflect the urban and rural context of Moray;
- Pressures on rural areas from large-scale expansion and storage requirements of the whisky industry and energy developments;
- Continuing a sustainable hierarchical approach to rural housing that balances delivery with protecting and safeguarding Moray's high-quality landscape;
- Identification of one or two public sites for Gypsy Travellers with a mixture of temporary and permanent pitches;
- A shortfall in the 10-year landbank for sand and gravel; and,
- Alignment of plans and strategies across the Community Planning Partnership and how Local Place Plans are taken account of in the preparation of the new LDP.

6.   ENGAGEMENT

6.1   Extensive engagement has been undertaken to support the preparation of the Evidence Report over the last 16 months. Section 5 (Engagement Statement) of the Evidence Report sets out in detail how views of the groups specified in the Act (children and young people, disabled people, Gypsies and Travellers, Community Councils, the public at large and key agencies) have been sought and taken into account.

6.2   Engagement has taken a variety of forms and methods to reach the groups specified in the Act and as wide an audience as possible. This has included hosting drop-in exhibitions, attending community events, facilitating workshops at primary and secondary schools, conducting surveys and engaging with parents and carers on Additional Support Needs (ASN). Engagement with Gypsies and Travellers has been primarily undertaken through the Housing Needs and Demand Assessment (HNDA). The views gathered have informed the evidence for the new LDP.

6.3   Community Councils were invited to attend engagement events and to make submissions to the Call for Ideas to highlight the key issues and concerns of their communities. A meeting was held with the Joint Community Councils in February 2023 on the new LDP process, and another meeting is scheduled in May 2024 on the Evidence Report. It was considered this was a more appropriate and meaningful way to engage Community Councils in gathering the evidence to inform the new LDP as the technical nature of the Evidence Report would likely inhibit participation. This was highlighted by Finderne Community Council who considered there was too much information to digest following consultation on the Energy Schedule of the Evidence Report.

6.4   The key agencies have been consulted on the relevant Schedules of the Evidence Report and their views and how these have been taken into account recorded in the 'Statements of Agreement or Dispute'. Key agencies have also been involved in the preparation of a number of studies cited in the Schedules that are or will become evidence to inform the new LDP.

6.5   The Act requires Planning Authorities to set out how they have invited local communities to prepare Local Place Plans (LPPs) and the assistance provided to help them prepare these. LPPs are community-led plans, setting out proposals for the development and use of land and offers communities the opportunity to develop proposals for their local area, expressing their aspirations and ambitions for future change. They must be prepared by a constituted community body such as a Community Council. Once registered by the Planning Authority, there is a legal responsibility to take LPPs into account in the preparation of the LDP.

6.6   The Engagement Statement sets out that the invitation to prepare a LPP has been advertised widely by the Council through emails to Community Councils, website and social media, and press releases. To date, 6 community groups have committed to preparing a LPP, 4 community groups have expressed an interest and one LPP has been submitted and is currently being reviewed. The Strategic Planning and Development team are working closely with the Community Support Unit (CSU) to assist communities to prepare their LPPs. This has involved the creation of a dedicated webpage, LPP and engagement templates, FAQs, signposting of relevant information, and a series of quarterly in-person meetings to support groups. The Council will endeavour to provide as much support as practically possible to community groups, however it is important to manage expectations given limited resource availability and other work commitments.

7.   **NEXT STEPS**

7.1   Should the Evidence Report be approved by the Council, it will be submitted to the Scottish Ministers for the Gatecheck. The Scottish Ministers will appoint a Reporter from the Scottish Government Division of Planning and Environmental Appeals (DPEA) to independently assess the evidence to prepare the new LDP. The SEA Scoping Report will be sent to the SEA Gateway when the Evidence Report is submitted to the Scottish Ministers for the Gatecheck.

7.2 Following the assessment of the Evidence Report, the Reporter will either prepare a letter setting out that the Evidence Report contains sufficient evidence to prepare the new LDP, and the reasoning for this, or prepare an 'Assessment Report' setting out the reasons that they are not satisfied that Evidence Report contains sufficient evidence and the recommendation for improving the evidence. A copy of the letter or Assessment Report will be sent to the Planning Authority and the Scottish Ministers. Where an Assessment Report is issued the Planning Authority will require to address the areas of improvement and resubmit the Evidence Report to the Gatecheck.

8. **SUMMARY OF IMPLICATIONS**

(a) **Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))**
The LDP is a vital aspect of supporting and facilitating the Council's Corporate and Community Planning objectives and priority for economic growth. The Plan also aims to deliver other key objectives including the delivery of affordable housing, provision of land for employment purposes and conservation and enhancement of our high quality natural and historic environment.

(b) **Policy and Legal**
Preparation of the LDP and RSS is a statutory responsibility in the Council's role as Planning Authority. Preparation must follow statutory procedures.

(c) **Financial implications**
The Gatecheck is carried out by the Scottish Government DPEA Division. Costs are charged to the Council on an hourly rate which is the same as the Examination for the Proposed Plan. As set out in the Development Plan Scheme (DPS) a 6-month time period has been estimated for the Gatecheck process. The Gatecheck will paid from the LDP annual revenue budget. As reported to the Planning and Regulatory Services Committee on 19 December 2023 (para 15 of the minute refers) this results in a LDP revenue budget pressure in 2024/25. This may impact on other work commitments of the SPD team. As the Gatecheck is a new and untested process, any delays or an extended Gatecheck will likely increase the cost and further budgetary pressures. The majority of the evidence has been gathered by Officers, however some external consultancy use has been required to provide specialist input.

(d) **Risk Implications**
Key risks identified are set out below which all raise risks of delays to the LDP process or risk of not delivering the proposals within the LDP;

- Reporter requests for additional information and/or re-write of the Evidence Report if they consider that there is insufficient evidence gathered and collated to proceed to the Proposed Plan;

- Staff resources: risks associated with other competing workloads and deadlines, and with sickness and/or losing experienced members of staff which would add delay, not only within Strategic Planning and Development but other services also.
- Uncertainty over LDP procedures and implementation until guidance on RSS and other LDP aspects are published and adopted by the Scottish Government.
- Failing to meet the Scottish Government's aspirations for wide engagement in the process.
- Risk of not resourcing services to deliver the new LDP and meet the aspirations for planners to be the enablers of change.

(e) Staffing Implications

Work on the Evidence Report is carried out within the Strategic Planning and Development Team. The preparation of the LDP is a priority for the SPD team, and at key peaks in workload this may have an impact on other workload commitments. Further pressure has been added by the decision to remove the post of Senior Economic Strategy Development Officer, retaining £30k towards consultancy support.

Preparation of the Evidence Report and the subsequent stages in the preparation of the LDP and its delivery involves other services, particularly Transportation, Housing, Education, Estates, Legal, and Consultancy which impacts upon workloads and performance within these services.

(f) Property

None

(g) Equalities/Socio Economic Impact

An Integrated Impact Assessment has been prepared. Whilst the full impacts of the LDP are unknown at this stage, it is anticipated that they will be mostly positive given the LDP seeks to provide for affordable housing, accessible housing, employment land and support inclusive and healthy environments through placemaking.

(h) Climate Change and Biodiversity Impacts

The new planning system introduces national and local planning policies aimed at reducing carbon emissions and addressing the nature crisis as well as concepts such as local living which will be key drivers in delivering change. The Evidence Report includes Schedules dedicated to Climate Change and Biodiversity. Climate change officers within the Strategic Planning and Development team have been involved in the Evidence Report and will continue to be in throughout the LDP process.

A SEA Scoping Report has been prepared alongside the Evidence Report. This ensures the environment is a primary consideration in the evidence gathered for the preparation of the LDP. Further assessments on carbon and biodiversity will be undertaken in the preparation of the LDP. A Habitats Regulations Appraisal (HRA) will also be undertaken to inform the Proposed LDP.

(i)   Consultations

Consultation has taken place with the Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Head of Education, the Learning Estate Programme Manager, the Legal Services Manager, the Transportation Manager, the Consultancy Manager, the Community Services Manager, the Equal Opportunities Officer, and the Democratic Services Manager have been consulted and comments received have been incorporated into the report.

9.   CONCLUSION

9.1   The Evidence Report and Gatecheck are two new stages in LDP preparation, introduced by the Planning (Scotland) Act 2019. Moray Council is one of the first planning authorities to prepare an Evidence Report and submit it to the Gatecheck. The process is untested. Discussions with the DPEA have informed the format and proportionality of the evidence to prepare the new LDP.

9.2   Whilst there are a small number of disputes on the evidence, primarily related to housing and infrastructure, the majority of key stakeholders are in agreement with the sufficiency of evidence. It is considered that there is sufficient evidence to move forward with the preparation of the new LDP.

9.3   Should the Evidence Report be approved by the Council, it will be submitted to the Scottish Ministers for the Gatecheck. At the same time, the SEA Scoping Report will be submitted to the SEA Gateway.

Author of Report: Eily Webster, Principal Planning Officer, Strategic
                         Planning and Development
Background Papers:
Ref: SPMAN-813460984-503

Moray Local Development Plan 2027

Evidence Report

April 2024

www.moray.gov.uk/MLDP2027

EVIDENCE REPORT

1. Introduction

The Evidence Report and Gatecheck are two key changes that have been introduced through the Town and Country Planning (Scotland) Act 2019, as amended, to the Local Development Plan (LDP) process. So far, both are untested.

This Evidence Report sets out the baseline information that will inform the new Moray LDP. The Report contains a summary of what the evidence means for the new LDP rather than the detail. A necessary and proportionate approach has been taken when considering the evidence as the Report is not expected to be a compendium of all available information. The Report is considered to provide a sufficient evidence base on which to prepare the new Moray LDP.

The Evidence Report contains a statement on the appropriateness of the Moray LDP 2020 spatial strategy, policies and allocations; the main issues arising from the evidence; compliance with Legislative Requirements; a Position Statement; an Engagement Statement; Site Assessment Checklists; and a series of 'Schedules'. Most of the evidence is set out in the 'Schedules' which are topic based and grouped into policy headings that reflect the National Planning Framework 4 (NPF4). There are a very small number of disputes over the sufficiency of the evidence with stakeholders, and these mainly relate to housing and infrastructure.

Extensive engagement has informed the evidence base for the new Moray LDP. The Engagement Statement sets out in detail how the views of the groups specified in the Act (children and young people, disabled people, gypsy's and travellers, Community Council's, the public at large and key agencies) have been sought and taken into account. Simultaneously, the Council is providing as much support and assistance as practically possible, to local community groups who have expressed an interest in preparing a Local Place Plan (LPP).

Moray is one of the first planning authorities to prepare an Evidence Report and submit it to the Gatecheck. Meetings and regular dialogue have taken place with the Scottish Government Division of Planning and Environmental Appeals (DPEA) on the format and proportionality of the evidence. The Report is considered to reflect these discussions.

Following approval by the Moray Council, the Evidence Report will be submitted to the Scottish Ministers for the Gatecheck to assess the sufficiency of the evidence to prepare the new Moray LDP. At the same time the Scoping Report for the Strategic Environmental Assessment (SEA) which is a statutory requirement for the new LDP will be submitted to the SEA Gateway.

2. Appropriateness of the Moray LDP 2020 Spatial Strategy, Policies and Allocations

The Moray Local Development Plan 2020 (LDP 2020) was adopted on 27 July 2020. The LDP 2020 was informed by 9 main land use issues identified as part of the Main Issues Report (MIR) in 2018. The Monitoring Reports for 2020-21 and 2021-23 examine whether the spatial strategy, policies and designations of the LDP2020 are addressing these main issues. A summary of how the LDP2020 is addressing the 9 main issues is set out below.

1. **Growth Strategy**
   A review of planning consents and completions shows that these have largely been in line with the Growth Strategy for Moray. However, approvals and completions have been more modest in the Tertiary Growth Areas of Lossiemouth, Keith, Fochabers, Mosstodloch and Aberlour. Recovery from the impacts of the Covid-19 pandemic is evidenced in the increased completions across 2021/22 and 2022/23.

2. **Providing a Generous Supply of Housing Land**
   All population projections need to be treated with caution however several trends can be drawn. Although the projected population of Moray is projected to decline (-3% from 2018 to 2043), data from National Records of Scotland (NRS) shows that the number of households living in Moray is projected to increase by 5% between 2022 and 2042. This trend is expected to continue which will be fuelled by the demand for smaller households. Similarly, the trend for an ageing population and smaller household sizes continues to be forecast and is an issue that is going to have to be addressed in future years, particularly with the lack of choice in the private market (i.e. a small supply of bungalows).

   The Housing Land Audit (HLA) 2023 demonstrated that Moray has a 12-year effective land supply with a further 9 years from the LONG supply which can be drawn on if the relevant triggers are met. This approach to LONG term housing land has been recognised as good practice and allows for longer term infrastructure planning through strategic level masterplanned expansion areas.

3. **Creating Quality, Integrated Healthy Places**
   LDP Primary Policy 1 (PP1) Placemaking is a detailed policy that addresses design issues that arise through planning proposals in Moray. The policy has been operational for over 3 years since the adoption of the LDP 2020. In conjunction with the Quality Audit (QA) process, this has seen improvements in the quality of information being provided in planning applications resulting in better decisions on the ground. The QA continues to play an important role in ensuring that all key elements of the policy are delivered including making significant improvements on areas such as improving character and identity, multi-functional open space provision, car parking, landscaping, embedding green and blue infrastructure to support biodiversity and climate change, and improving mental health and well-being. The QA has been revised to take cognisance of NPF4. Additional Planning Guidance on LDP 2020 policies have also helped to provide clarity on specific policy areas with is intended to help developers understand what is required to comply with policy.

4. **Providing a Generous Supply of Employment Land**
   The Employment Land Audit 2023 demonstrates that overall there is 99.87ha of effective employment land. However, there is a shortage of industrial land in Forres and Speyside.

Similarly, I7 Barmuckity/Elgin Business Park, is progressing well and work is needed to bring new sites forward to ensure a continued supply of land. No planning applications have been received for new industrial estates. Pressure for leisure and retail uses on existing industrial estates is anticipated to continue and will require to be monitored to assess the effectiveness of Policy DP5 Business and Industry and DP7 Retail/Town Centres. There are emerging trends for development proposals such as Battery Energy Storage Systems (BESS) which is placing increasing pressure on the supply of serviced employment land. This is having implications for designated employment sites as these types of development are land hungry, offer very little, if any, permanent local employment opportunities, and do not fall within the use classes normally associated with industrial estates.

5. **Taking an Infrastructure First Approach**

Developer Obligations are being collected towards infrastructure including healthcare, education, transportation and a 3G pitch in Forres in line with LDP2020 Policy PP3 Infrastructure and Services and the associated Developer Obligations Supplementary Guidance (SG). Site specific infrastructure requirements, methodology and rates to seek developer obligations towards the identified infrastructure requirements are set out in the statutory Developer Obligations SG. This SG is currently under review and is anticipated to be reported to this Committee in the middle of this year.

Moray Council facilitate a LDP Delivery Group which includes a wide range of representatives from NHS Grampian, Scottish Water, Scottish Gas Networks (SGN), SSEN Transmission and SSEN Distribution, Transport Scotland, and Council Services for Education, Transportation, Sports and Recreation, and Housing. This Group informed the LDP2020 infrastructure requirements as well as subsequent reviews of the SG, and similarly the Group will inform the evidence base for the new LDP and Delivery Programme.

6. **Pressures on Moray's Landscape and Rural Cultural Heritage**

There have been limited departures from policy EP3 Special Landscape Areas (SLA) and Landscape Character and policy EP5 Open Space. Impacts on the landscape from large-scale onshore wind developments and other types of energy developments remain a pressure. The Keith Green Energy and Infrastructure Framework was prepared in response to the pressures of development associated with the National Grid around the wider Keith area. LDP2020 Policy EP5 has been largely effective in restricting new housing within environmental designations (ENV) such as open spaces. The loss of open space to accommodate development remains low.

7. **Safeguarding and Promoting Biodiversity**

Biodiversity enhancement is being delivered through new development since the adoption of both the LDP 2020 and NPF4 which places a strong emphasis on the nature crisis and climate emergency. Since the adoption of the LDP 2020 policy, applications must provide a biodiversity plan to demonstrate how their proposals safeguard and enhancing biodiversity. This has seen notable improvements in terms of the variety of planting and species that is being provided, incorporation of blue and green infrastructure, and measures such as bat boxes, swift bricks and hedgehog highways which are all standard features. NPF4 places significant importance on tackling the nature crisis. Going forward it is essential that biodiversity plans do not become generic

and are site specific to deliver maximum benefits. A biodiversity strategy, identification of nature networks, and further training on biodiversity issues will be undertaken.

8.   **Delivering on Climate Change**

Planning for Climate Change and supporting the reduction of greenhouse gas emissions is embedded within a number of LDP2020 policies. PP1 Placemaking and DP1 Development Principles include criteria such as integrating multi-functional active travel routes, green and open space; maximising environmental benefits through orientation of buildings to maximise as solar gain and wind shelter; supporting and enhancing biodiversity; designing open space to be multi-functional including green/blue networks; EV charging; cycle parking provision; avoiding areas at flood risk; dealing with surface water in a sustainable manner to have a neutral impact on flooding; and avoiding workable reserves of prime agricultural land or productive forestry.

NPF4 places significant weight on addressing the climate emergency and all proposals must demonstrate how they address climate change. To assist applicants planning guidance was prepared to support the implementation of NPF4 which requires applicants to calculate the lifecycle carbon from proposals to minimise greenhouse gas emissions as far as possible and adapt to current and future risks from climate change.

9.   **Rural Housing**

The hierarchical policy approach introduced in the LDP 2020 has been successful in protecting pressurised areas from further inappropriate development. All applications within Pressurised and Sensitive Areas (PSA) have been refused and this position has been subsequently supported by the Moray Local Review Body (LRB) where reviews were requested. Siting and design policy requirements are also driving better located houses within the landscape and design standards have also improved with more traditional simple forms of homes being delivered on the ground.

Allocations

The LDP 2020 Monitoring Report for 2021-23 includes a table setting out the progress on allocated housing, employment and opportunity sites. This will be used to inform whether any allocated sites need to be removed and replaced with alternatives to ensure that there is a deliverable housing land supply for the Housing Land Requirement of the new LDP. This process will be informed by gathering information through the Effectiveness and Deliverability Checklist to substantiate whether sites are deliverable. If the evidence is not forthcoming proposed sites may not be included and existing allocations may be deleted.

3. Main Issues Arising from the Evidence

A summary of the demographic challenges and the main issues arising from the evidence that require to be addressed through the new LDP are set out below. The main issues are grouped in accordance with the NPF4 policies on Sustainable Places, Liveable Places and Productive Places.

Demographic Challenges

Whilst population projections need to be treated with caution, data from the National Records of Scotland (NRS) shows that for Moray:

- The population is projected to decline (-3% from 2018 to 2043).
- The number of 65+ year olds is expected to increase by 32% between 2022 and 2042, and over the same period the number of people of working age is expected to decrease by 12%.
- The number of 75+ year old head of households is projected to grow by 84% by 2043 whilst every other age range will decrease.
- Single person households are expected to grow by 17% whilst two adult households are expected to grow by 11% between 2018 and 2038. These households are subject to the greatest growth levels in Moray.
- The number of households living in Moray is projected to increase by 5% between 2022 and 2042. This trend is expected to continue which will be fuelled by the demand for smaller households.

These projections highlight the trend that Moray needs to address an ageing population with a declining work age population which will have an impact on the economy, housing and healthcare provision. The LDP will need to address this in its policies and proposals.

Significant investment from the Levelling Up Fund (LUF), Moray Growth Deal (MGD), UK Government Long Term Plan for Towns (LTTP), the UK Shared Prosperity Fund (UKSPF) and Place Based Investment Programme (PBIP) and potentially the Just Transition Fund (JTF) will help to address the demographic challenges facing Moray and the main issues identified for the new LDP. This is discussed in detail within the Schedules of the Evidence Report.

Sustainable Places

- Moray faces the following risks from climate change: rising temperatures, changes in rainfall patterns, increasing sea levels and a higher frequency of extreme weather patterns. This may present itself as increased droughts and floods, changes to the timing of the growing season and upsurges in pests and diseases, further coastal flooding, erosion and damage to infrastructure and property and possibly loss of life.
- The LDP has a pivotal role to play in tackling climate change and associated risks. This includes identifying nature-based solutions such as riparian planting and greening around buildings and locating and adapting buildings to deal with heatwaves and flood risk. The evidence presented in the report including ongoing studies will inform the LDP.
- Regional Coastal Adaptation Plans (CAP) to identify risk and consequences of changes to the coast are being developed and will inform the LDP approach in terms of coastal development or retreat.
- Exploration of a Regional Land Use Partnership (RLUP) through the Regional Spatial Strategy (RSS) and LDP to support the delivery of a natural capital approach. This

involves identifying nature-based solutions to address climate change (e.g. peatland restoration, woodland expansion, natural flood management) and protecting and enhancing existing land assets to deliver ecosystem benefits (e.g. emissions reduction, carbon sequestration, food production). The spatial implications will be reflected in the LDP.

- A tailored approach to the implementation and delivery of NPF4 policies on tackling climate change, including carbon offsetting, will be considered for the LDP.

- Moray has experienced significant pressures from onshore windfarms over the last 20 years. Two areas of significant cumulative impact have/are emerging at Dallas/Knockando Moor and Cabrach which have resulted in significant adverse landscape and visual impacts. Despite Moray Council having up-to-date policy and landscape sensitivity studies and objecting to a number of windfarm developments as these are contrary to the LDP they continue to be consented by the Scottish Government. The cumulative impact of windfarms is a key issue to be considered as part of the approach to maximising opportunities for renewable energy for the LDP.

- The LDP will reflect the outcomes of the Moray Council Hydrogen Strategy. This will involve identifying sites for hydrogen generation facilities and in the longer term generating hydrogen from green electricity sources in Moray.

- Local landscapes are currently protected from inappropriate development through LDP2020 policy. NPF4 policy does not afford the same protection. Consideration will be given to a similar approach to ensure that Moray's high-quality landscapes are safeguarded.

- Keith and the surrounding area is coming under increasing pressure, on a piecemeal basis, from development associated with infrastructure for the National Grid. The Keith Green Energy and Infrastructure Framework seeks to appropriately balance the demand for renewable energy infrastructure with local landscape sensitivities and the impacts of cumulative development. The Framework will be reflected in the LDP.

- Development of a Nature Network (NN) including the requirement to help protect 30% of Scotland's land (and coastal and freshwaters) by 2030 (30x30) for biodiversity improvement is currently being undertaken and will be reflected in the LDP. The NN may impact on land use designations. The protection of local nature sites is being considered through the development of the NN.

- Biodiversity enhancement and improvements will be delivered through a variety of means such as the proposals within the Forestry and Woodland Strategy, Natural Capital Assets Plan, and Open Space Strategy and these will be reflected in the LDP. Evidence suggests that biodiversity plans for development proposals need to be more site-specific and monitored and managed in perpetuity. This will be addressed through the LDP.

- A mechanism for offsetting biodiversity requirements may be necessary. Scottish Government guidance is awaited on this which will inform the LDP approach.

- The Forestry and Woodland Strategy will inform the RSS and LDP proposals for forestry, woodlands and trees in Moray. A multi-benefit approach will be taken (e.g. NN and natural capital) and opportunities for recreation and tourism identified. The potential for a Moray Climate Forest or similar approach will be considered through the LDP. The promotion of local wood sources will be considered through CWB.

- A Countryside Around Towns (CAT) rather than a Green Belt designation operates in Moray. This is considered more appropriate for the scale and pressures of development in Moray. A review of Countryside Around Town (CAT) designations will be undertaken to inform the LDP.

- Prime Agricultural Land (PAL) is currently protected through the LDP2020 and latterly through NPF4. This may have land use implications for the allocation of sites. The

approach to identifying locally and culturally important soils will be considered through the LDP.

- A number of audits and strategies will inform the protection and expansion of blue and green infrastructure in the LDP, and spaces for play, recreation and sport. This will include the Open Space Strategy, Play Sufficiency Assessment and Food Growing Strategy.

Liveable Places

- 4,850 house units are required for the 2024-2037 period in Moray. This is based on the Housing Need and Demand Assessment (HNDA) 'genuine growth scenario'. The HNDA has received 'robust and credible' status from Scottish Government. As there is an existing generous effective housing land supply and an effective 5 years plus supply, there is no need to identify additional land in the new LDP. However, consideration will be given to retaining LONG sites in the LDP to ensure a pipeline of sites is available, and whether any allocated sites need to be removed and replaced with alternatives in the LDP.
- There are an estimated 2,577 empty homes in Moray and further flexibility is added to the housing land supply by not including these in the housing land requirement. Consideration will be given as to how empty homes can best contribute to need.
- The identification of additional brownfield designations and increasing the capacity of allocated sites to reflect smaller households and the need for single storey dwellings will be considered through the new LDP.
- There are high levels of affordable housing need in Moray. It is proposed to continue with the current requirement for 25% of homes to be affordable. This is in accordance with NPF4 policy 16, and only in exceptional circumstances will a lower contribution be acceptable. NPF4 policy does not address piecemeal development and consideration will be given to addressing the avoidance of policy requirements through the LDP.
- Given the scale of local need for specialist housing a tailored approach is required through the new LDP.
- One or two public sites for gypsy travellers with a mixture of temporary and permanent pitches (15-20 pitches) requires to be identified through the new LDP. Buckie and Elgin are priority areas given the high level of unauthorised encampments.
- The spatial implications of short-term lets and the need for control areas will be reviewed through the new LDP.
- There are capacity issues with Education and Healthcare infrastructure that need to be addressed to facilitate development planned through the new LDP. The Education Authority and NHS Grampian and Health and Social Care Moray are working with the Planning Authority to identify and address the spatial implications of estate reviews, investment plans, etc. Delivery and timing of infrastructure is often dictated by the availability of funding and investment processes at both national and local levels.
- A Transport Appraisal will inform the LDP and this will be undertaken in consultation with Transport Scotland. This will identify pressures on the network. The findings of the A96 corridor review are awaited and these will be incorporated into the Transport Appraisal and will have implications for interventions and site selection in the LDP.
- Any rail investment/improvements arising from options identified in the A96 Corridor Review may have implications for the LDP in terms of safeguarding routes/sites.
- The Scottish Government target of a 20% reduction in car kilometres is more challenging for a rural local authority like Moray. Reducing the need to travel long distances for daily needs and services will be considered through the LDP approach to Local Living.

- Consideration will be given to a similar approach to the LDP2020 to require developers to provide EV charging points for residents, visitors and employees.
- Local Living will take a variety of forms in Moray. A network of centres will be identified through the LDP informed by relevant evidence such as the Moray Retail Study, Active Travel Strategy, Open Space Strategy and Play Sufficiency Assessment.
- High quality places are being delivered through a detailed Placemaking policy in the LDP 2020 and associated Quality Audit (QA). Consideration will be given to a similar tailored approach to address specific design issues in Moray for the new LDP.
- The Strategic Flood Risk Assessment (SFRA) is a key piece of evidence to identify all sources of existing and future flood risk within the Moray LDP area and will be used to inform the development of the spatial strategy. The adoption of revised Flooding and Drainage Supplementary Guidance will ensure that all new development proposals are aligned with NPF4 Policy 22 Flood Risk and Water Management.
- The Local Heat & Energy Efficiency Strategy (LHEES) Framework and Delivery Plan will inform the LDP. The Delivery Plan sets out how Moray Council proposes to support the implementation of its LHEES. As part of the LHEES process potential heat networks have been identified in Elgin, Forres and Buckie.
- A sustainable hierarchical approach to rural housing that balances delivery with safeguarding and protecting Moray's high-quality landscape is being successfully delivered through the LDP2020. Consideration will be given to a similar tailored approach that is based on detailed evidence rather than the generic urban-rural classification which is not considered to reflect local circumstances. Further house plots in Rural Groupings will require to be identified to support the hierarchical approach in Moray. The Cabrach is the only area identified as suitable for resettlement in Moray.

Productive Places

- Community Wealth Building (CWB) is a key policy area for the new LDP given the opportunities that CWB presents to tackling economic disadvantage and inequality, and the benefits it can provide to local communities. This correlates with NPF4 policy 11 Energy which sets out that "Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities". The outcome of the study being undertaken jointly with Highland Council to review the socio-economic benefits arising from energy related developments and whether these are being maximised, and if not, to develop a methodology to maximise benefits may require a tailored approach within the LDP.
- To ensure that there is sufficient land for business and industry and a suitable range of sites across Moray, an additional 53.6ha of general industrial land requires to be identified in the new LDP. There is currently an acute shortage of land in Forres and Speyside. This figure increases significantly if land hungry businesses such as distilling and renewable energy developments are included. 40ha is required for inward investment purposes.
- There are viability issues with the delivery of serviced employment land across Moray. Intervention is required to open-up and service sites, particularly in lower tier settlements.
- Pressures on existing industrial land exists from other uses such as recreational facilities, restaurants/cafes and car showrooms. These have the potential to change the character of the industrial estate potentially making it more difficult for heavier industries to expand or locate.

- Diversification of Buckie Harbour to support Operations and Maintenance (O&M) associated with offshore wind energy developments in the North Sea.
- Increasing pressure for Battery Energy Storage Systems (BESS) is impacting on the availability of serviced employment land. The level of local employment associated with BESS is usually nil, and the scale of development could lead to the LDP being unable to meet demand from businesses from use classes 4, 5 and 6 which employ more people and are more suited to industrial designated sites. This is most acute in Keith and Elgin. Consideration will be given to whether the LDP needs to protect employment land from BESS and other Renewable Energy developments and National Grid infrastructure.
- Pressures from the large-scale expansion and storage requirements of the whisky industry, and developments associated with the energy sector including anaerobic digestion plants, BESS and infrastructure to support the National Grid are increasing in rural areas including on the periphery of towns across Moray. These are most acute in Speyside and the surrounding areas of Keith, Buckie and Elgin.
- At the Moray-wide level, there are no retail qualitative and quantitative deficiencies in convenience goods (e.g. food). There is a significant qualitative deficiency in comparison goods (e.g. clothes) however this reflects market demand and national trends.
- Supporting the regeneration and changing role of town centres is a key priority for the LDP. This includes promoting town centre living through the redevelopment and refurbishment of buildings and land which is reflected in the Elgin City Centre Masterplan, Town Centre Improvement Plans (TCIPs) and other supporting plans and strategies.
- Tourism is a major industry in Moray. Consideration will be given to identifying opportunities for tourism development including designating a Moray Forest Park in recognition of the importance of forests and woodlands to recreation and tourism in Moray. The Culbin to Burghead Coast SLA is sensitive to development pressures from tourism proposals and any increase in visitor numbers to fragile habitats such as Culbin Forest.
- NPF4 requires a landbank of at least 10 years at all times in construction aggregates. An insufficient landbank of sand and gravel exists in Moray. There is ongoing dialogue with local operators to identify opportunities to increase reserves and secure a sufficient landbank for the next 10 years and beyond.

4. Position Statement

The summary below provides an overview of the structure of the schedules and how they relate to policy areas within National Planning Framework 4. It provides an overview of the evidence discussed in each schedule and identifies the statements of agreement and disputes for each schedule.

<u>Overview</u>

The Moray Local Development Plan Evidence Report has been split into 18 themed schedules that provide a summary of the evidence base for each topic. The schedules are grouped to broadly reflect the policy areas within NPF4. Each schedule provides a summary of evidence relating to the policy areas within NPF4 as set out below.

Schedule	NPF4 Policy Area	NPF4 Policy Areas
Schedule 1 Climate Change	Sustainable Places Liveable Places	NPF4 policy 1 Tackling the climate and nature crisis and policy 2 Climate mitigation and adaptation, policy 10 Coastal Development, and policy 19 Heat and Cooling
Schedule 2 Biodiversity, Natural, Blue and Green Spaces	Sustainable Places	NPF4 policy 3 Biodiversity, policy 4 Natural places, policy 5 Soils and policy 8 Greenbelts and policy 20 Blue and green infrastructure.
Schedule 3 Forestry, Woodland and Trees	Sustainable Places	NPF4 policy 6 Forestry, woodlands and trees.
Schedule 4 Historic Assets and Places	Sustainable Places	NPF4 policy 7 Historic Assets and places and policy 9 Brownfield, vacant and derelict land and empty properties
Schedule 5 Energy	Sustainable Places	NPF4 policy 11 Energy
Schedule 6 Design, quality and place	Liveable Places	NPF 4 policy 14 Design, quality and place and policy 23 Health and Safety
Schedule 7 Local Living	Liveable Places	NPF4 policy 15 Local Living and 20 minute neighbourhoods and policy 23 Health and Safety
Schedule 8a Housing Land	Liveable Places	NPF4 policy 16 Quality homes and policy 9 Brownfield, vacant and derelict land and empty properties
Schedule 8b Quality Homes – including affordable and specialist housing requirements	Liveable Places	NPF4 policy 16 Quality homes
Schedule 9 Rural Homes	Liveable Places	NPF4 policy 17 Rural homes
Schedule 10a Infrastructure	Liveable Places	NPF4 policy 18 Infrastructure first, 15 Local Living policy ,21 Play,

		recreation and sport, policy 23 Health and Safety, policy 24 Digital infrastructure, 11 Energy, and policy 12 Zero waste
Schedule 10b Transport	Sustainable Places Liveable Places	NPF4 policy 13 Sustainable transport and policy 18 Infrastructure first
Schedule 11 Flood Risk	Liveable Places	NPF4 policy 22 Flood risk and water management, 20 Blue and green infrastructure, and 10 Coastal development
Schedule 12 Community Wealth Building	Productive Places	NPF4 policy 25 Community wealth building
Schedule 13 Business and Industry	Productive Places	NPF4 policy 26 Business and Industry
Schedule 14 Town Centre and Retail	Productive Places	NPF4 policy 27 City, town, local and commercial centres and policy 28 Retail.
Schedule 15 Rural Development	Productive Places	NPF4 policy 29 Rural Development
Schedule 16 Tourism	Productive Places	NPF4 policy 30 Tourism
Schedule 17 Culture and Creativity	Productive Places	NPF4 policy 31 Culture and Creativity
Schedule 18 Minerals	Productive Places	NPF 4 policy 33 Minerals

It is noted that the aquaculture industry is not active within Moray and therefore the schedules do not cover NPF4 policy 32 Aquaculture.

Schedule 1 Climate Change, Adaptation

The summary of evidence outlines the sources and scale of greenhouse gas emissions in Moray, the likely climate risks affecting Moray and who this is likely to be impact most. The summary sets out opportunities to reduce costs of adapting to climate change including nature-based solutions and adaptation of buildings. Moray's Local Heat and Energy Efficiency Strategy sets out a framework for improving the energy efficiency of buildings and reducing greenhouse gas emissions from heating buildings. A natural capital assessment was undertaken in 2023 that identifies opportunities for natural capital investment in Moray. The summary of evidence also discusses the potential for Regional Land Use Partnerships to deliver a land use change and natural capital approach to achieving climate change targets.

The summary of evidence notes the work on Regional Coastal Adaptation Plans that identify the risk and consequences of change to the coast. These are due to be reported to Council before summer 2024.

No statements of agreement or dispute with the sufficiency of the evidence base have been submitted.

Schedule 2 Biodiversity, Natural Places, Green and Blue Infrastructure

The summary of evidence identifies that the North East Scotland Biodiversity Partnership habitat statements provide a summary of habitats found in the area, information on the habitat status and some of the species they support. Moray Council's Biodiversity Study also provides a baseline of the biodiversity of the area which drew on a large range of data sources amalgamating these to identify species locations, priority areas and hotspots across Moray. Following on from the biodiversity study Moray Council has commissioned a nature network study to outline the options available for where the nature network will be.

The summary of evidence lists designated sites across Moray including Ramsar sites, Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation, Local Nature Reserves, and Local Nature Sites. The summary of evidence also notes the data available relating to peatland, carbon rich soils and prime agricultural land.

The summary of evidence references the Moray Local Landscape Designation Review 2018 that identified 18 Special Landscape Areas. The Moray Wind Energy Landscape Sensitivity Study 2023 is also identified which identifies broad landscape and visual sensitivities and constraints and opportunities at a strategic scale. The evidence report notes the ongoing review work in respect of Countryside Around Towns.

The summary of evidence references the Moray Open Space Strategy 2018 and notes that an updated strategy is currently being prepared with audit field work completed. The summary of evidence also identifies the data and information within the Moray Core Paths Plan, Food Growing Strategy and the Moray Play Sufficiency Assessment.

Nature Scot suggested some additional data sets and additional evidence sources. To ensure a proportionate approach some but not all of these data sets have been added to the schedule. A protected areas map has also been provided as a core document.

SEPA identified additional evidence and specifically suggested further evidence was included in respect of blue and green infrastructure. To ensure a proportionate approach and avoid repetition between schedules the additional evidence sources have not been added to Schedule 2.

Schedule 3 Forestry, Woodland and Trees

The summary of evidence refers to both the Moray Woodland and Forestry Strategy 2018 and the Draft Moray Woodland and Forestry Strategy 2024 which includes a description of existing woodland in Moray, the environmental benefits, economic importance of the sector, and the recreational opportunities provided. The draft strategy outlines the challenges to woodland and forestry in the area and outlines opportunities for the visitor economy and links to studies on nature networks, carbon offsetting and funding opportunities through the Just Transition Fund. The evidence summary also references the register of Tree Preservation Orders and GIS datasets relating to forestry.

- **Scottish Forestry agreed the sufficiency of the evidence base with the addition of some data sets which have been added to the schedule.**
- **Comments from Nature Scot identified a list of data sets and additional designated sites. The additional sites have been added to the schedule and the riparian woodland data added to the schedule. The other data sets referred to by Nature Scot relate to nature conservation designation designations and biodiversity and it was not considered proportionate to refer to these within this schedule.**

Schedule 4 Historic Assets and Places

Key data sets providing the location of conservation areas, listed buildings, gardens and designed landscapes, archaeology sites and monuments and battlefields are held and regularly updated by the Council. The Moray Historic Environment Record contains known sites of archaeological and historic importance. The summary of evidence also references i Scheduled Monuments, the buildings at risk register, unlisted environmental assets and the programme of conservation area reviews.

- **The Regional Archaeology Service's comments have been reflected in the schedule.**
- **Historic Environment Scotland are satisfied with the sufficiency of the evidence set out and requested additions relating to buildings at risk. Other observational comments made by HES were noted.**

Schedule 5 Energy

Details of operational, consented and proposed wind farms are set out within core documents with the evidence summary identifying two areas of significant cumulative impact. The summary notes the key areas within the Landscape Sensitivity Study 2023 where significant development pressure has been identified. Other energy developments including solar and battery energy storage (BESS) are discussed within the summary. The summary of evidence also references the location of key electrical grid projects, the Moray Council Hydrogen Strategy 2022 and a review of socio-economic benefits from energy development. The evidence summary notes the Just Transition Fund as key funding source.

- **Finderne Community Council provided comments in respect of the pressure of windfarms.**
- **Scottish and Southern Electricity Networks Distribution did not identify any areas of dispute and identified additional evidence to be considered.**
- **Scottish and Southern Electricity Networks Transmission did not identify any areas of dispute. Some minor changes have been updated in the schedule. SSEN Transmission provided comments on socio economic benefits from energy development. It was also observed that in some cases the close proximity of BESS to SSEN Transmission substations has restricted the ability to extend some substations.**
- **Speyside Community Council note that they support the summary of implications and have raised concerns about the national policy approach and cumulative impacts.**
- **The Cabrach Trust have provided comments and observations relating to the need for further renewable energy projects and cumulative impacts.**

Schedule 6 Design, quality and place

The summary of evidence sets out the approach to placemaking taken in the current and previous Local Development Plans. It sets out the role key design principles, masterplans and the quality auditing process play in delivering higher standards of urban design. A table summarises key improvements and the associated benefits. Links are made to the Council's active travel strategy, open space strategy, climate change strategy, biodiversity duty report and Public Health Scotland's Strategic Plan.

- **Moray Council Transportation, Public Health and Flood Risk Management comments have been incorporated into the evidence summary.**
- **Nature Scot did not identify areas of dispute but suggested adding reference to Designing Streets. Moray Council considers this to be policy context rather than evidence.**
- **SEPA did not provide specific comments.**

Schedule 7 Local Living and 20 Minute Neighbourhoods

The schedule describes the different settlement patterns across Moray and the potential approach to Local Living for each including the rural context. The schedule references masterplan areas and Town Centre Improvement Plan and how these promote Local Living. An approach to local living for Moray is set out within the schedule with the cross over between other schedules and policy areas identified.

- **Comments from Moray Council Education, Transportation, Community Support Unit, Sport and Culture and Environmental and Commercial Services have been incorporated into the evidence summary.**
- **NHS Grampian did not identify areas of dispute but note the financial challenges associated with providing new facilities and also the challenges of staffing in more rural areas. They note the focus of NHS Grampian continues to be addressing capacity at existing premises.**

Schedule 8a Quality Homes – Housing Land Supply

The evidence report summary sets out the Minimum All Tenure Housing Land Requirement within NPF4 and the demographic context of Moray. A summary is provided on the outcomes of the Housing Needs and Demand Assessment 2023 including HNDA all tenure housing estimates based on 3 scenarios and sets out the reasoning for using the growth scenario to calculate the housing land requirement. Details on existing supply from the 2023 Housing Land Audit is also summarised. Targets for housing completions on brownfield land and within town centres are also discussed.

- **Comments from Moray Council Housing have been incorporated into the evidence summary.**
- **Homes for Scotland have identified areas of dispute and consider levels of existing housing need in Moray are more complex and much higher than currently being accounted through the HNDA. Concerns primarily relate to what has been taken into account through the HNDA and the deliverability of sites including LONG designations and brownfield land. Homes for Scotland have submitted a report by Diffley Partnership and Rettie and Co to support their position.**

Schedule 8b Quality Homes including affordable and specialist housing

A summary of the tenure requirements across Moray from the HNDA are included within the schedule. Information from the HNDA relating to accessible and wheel chair accessible housing is summarised in the schedule as is requirements for student accommodation and key worker housing (including MOD). As part of the HNDA a study into the accommodation needs of Gypsy/Travellers and Travelling Showpeople was commissioned with the study results summarised in the schedule. The Moray Self Build Register is also referenced.

- **Comments from Moray Council Housing have been incorporated into the evidence summary.**
- **Homes for Scotland have identified an area of dispute and state concern that the level of market housing proposed under the Local Housing Land Requirement is insufficient to deliver the level of affordable and specialist homes needed. They state primary data requires to be gathered to ascertain actual requirement for specialist housing before any on-site provision is sought. A cautious approach in respect of the levels of accessible and affordable housing is required. Homes for Scotland have submitted a report by Diffley Partnership and Rettie and Co to support their position.**

Schedule 9 Rural Homes

The background and extensive analysis completed to inform an evidence led approach to rural housing in Moray for MLDP2020 is summarised with the ongoing monitoring of the policy approach noted. The role of rural groupings, the Planning Interpretation Note on NPF4 policy 17 Rural homes and the Moray Self Build Register is also discussed. The identification of Cabrach as a fragile community is also noted. Links to schedule 8a and 8b are noted.

A gap in evidence relating to consideration of how rural populations have changed is identified within the schedule. Release of 2022 census data is awaited and analysis will be completed when this is published.

- **No statements of dispute have been identified. The Cabrach Trust have provided comments relating to the work being undertaken to regenerate the Cabrach and the context behind the approach being taken.**

Schedule 10a Infrastructure First

The evidence summary includes the Council's Learning Estate Strategy (including Delivery Programme), school roll forecasts (including schools forecast to reach capacity), and ongoing work reviewing each Associated School Group. The spatial implications for education are set out. Further Education and childcare are also discussed within the schedule. Ongoing work to review Developer Obligations Supplementary Guidance is noted.

NHS Grampian Asset Management Plan, NHS Grampian Strategic Plan "A Plan for the Future 2022-2028" and projects associated with the Moray Transformation Programme Board are discussed. The capacity of primary care premises including medical practices, NHS dental chairs and community pharmacies is outlined.

The approach and ongoing work in developing a Moray Sports and Leisure Strategy Capital Investment Pan is discussed within the schedule.

The evidence summary sets out the water treatment works and waster water treatment works that currently have capacity. The evidence summary includes an overview of capacity within the gas network. The implications of expansion and upgrade of the national electricity grid is discussed and associated pressures is discussed within the schedule.

Digital connectivity, waste management, recycling facilities and cemetery provision are also discussed within the schedule.

- **Comments from Moray Council Education, Housing, Sport and Culture and Environmental and Commercial Services have been incorporated into the evidence summary.**
- **Scottish Gas Networks are in agreement with the sufficiency of the evidence set out within the schedule providing additional evidence sources.**
- **Sport Scotland are in agreement with the sufficiency of the evidence base and provided additional comments and data sources.**
- **NHS Grampian and Moray Health and Social Care Partnership provided a joint statement of agreement with some minor comments.**
- **Scottish Water are in agreement with the sufficiency of the evidence base.**
- **SSEN Transmission are in agreement with the sufficiency of the evidence base with factual updates provided and incorporated into the schedule.**
- **SSEN Distribution are in agreement with the sufficiency of the evidence base with additional evidence sources suggested.**
- **Homes for Scotland have identified areas of dispute regarding the level of detail and referencing relating to primary health care facilities, the evidence behind the assumption of 80% working capacity for primary schools, the assumptions and methodology used for school roll forecasting and the timing of publication of developer requirements.**

Schedule 10b Transport

The schedule confirms the Council's commitment to undertaking a Transport Appraisal noting the budget allocation and ongoing work to support this. The schedule identifies some data sets, including 2022 Census data and Moray specific LATIS model data, that will require to be obtained to inform the Transport Appraisal.

The schedule provides a summary of strategies, studies and key data including car ownership information, public transport accessibility and provision, rail services, the Moray Active Travel Strategy, information about projects aimed at encouraging active travel, Public EV Charging - Moray Strategy and Expansion Plan, the Moray Hydrogen Strategy, 20% reduction in car kilometres, average daily traffic figures from permanent counters across Moray (Inter urban roads and trunk road network) and road safety .

Travel in and around Elgin is discussed in more detail within the schedule including the Elgin Transport Strategy developed in 2017 and a summary of information from permanent counter sites.

The outcomes of the A96 Corridor Review are currently unknown and the schedule summarises information from the Case for Change.

- **HiTrans and NESTRANS have noted their agreement to the sufficiency of the evidence base.**
- **Transport Scotland have provided additional data sources, commented on parking and identified better links were required between schedules around achieving targets to achieve 20% reduction in car kilometres.**

Schedule 11 Flood Risk and Water Management

The schedule summarises the flood risk plans and assessments the Council has in place in respect of flood risk including the Findhorn, Nairn and Speyside Local Flood Risk Management

Plan and the North East Local Flood Risk Management Plan. The summary includes a description of the flood risk and priority actions identified within the Findhorn Nairn and Speyside Local Flood Risk Management Plan. The summary of evidence notes the Council is working towards updating supplementary guidance on flood risk and drainage impact assessment and developing Surface Water Management Plans for priority areas.

- **Scottish Water have noted their agreement to the sufficiency of the evidence base.**
- **SEPA noted that the Strategic Flood Risk Assessment for the Moray Local Development Plan 2020 requires to be updated to reflect recently published guidance and updated flood maps. To address this Moray Council have reached agreement with SEPA to prepare a SFRA to be agreed with SEPA prior to submitting the Evidence Report. SEPA also request that site appraisal methodology includes questions related to flood risk.**

Schedule 12 Community Wealth Building

The key evidence discussed within the schedule is the draft Moray Community Wealth Building Strategy and the Community Wealth Building Planning Policy Guidance. The schedule also discusses the Local Outcome Improvement Plan v2, Inequalities in Moray 2019 report, Locality Plans for New Elgin East and Buckie Central, information from the Community Asset Transfer register, and the Scottish Index of Multiple Deprivation. A recent report investigating the benefits that have arisen from the construction and operation of energy developments in Moray and how these benefits might be maximised in the future is summarised.

- **Moray Council Community Support Unit, Moray Council Community Wealth Building Officer and Business Gateway all agreed the sufficiency of the evidence base.**

Schedule 13 – Business and Industry

The Moray Business Property Needs Study 2023 and Employment Land Audit 2023 is summarised within the schedule. The schedule also provides a summary of evidence related to the Moray Economic Strategy, Moray Growth Deal, the draft Moray Woodland and Forestry Strategy and Keith Green Energy and Infrastructure Framework. Information from the LDP monitoring report identifies the pressure for other uses on industrial estates.

- **Highlands and Islands Enterprise agreed the sufficiency of the evidence of base but commented that reference could be made to the Enterprise Park Forres, Buckie Harbour Masterplan and Moray Hydrogen Strategy.**

Schedule 14 Town Centre and Retail

The schedule summarises the 2023 Town Centre Health Check and the results of a town centre perception study. This summary includes information about vacancy levels, clustering of non-retail uses and drive throughs. A summary of evidence from the Moray Retail Study 2021 has been included relating to the network of centres, requirements for further retail provision and neighbourhood retail requirements. The schedule also refers to Town Centre Improvement Plans, Elgin City Centre Masterplan and the Moray Growth Deal. Funding through the Scottish Government Place Based Investment Programme, UK Shared Prosperity Fund, Levelling Up Fund and UK Government Long Term Plan for Towns and Moray Growth Deal is also discussed.

- **No statements of agreement or dispute were made.**

Schedule 15 Rural Development

The schedule set out the economic characteristics and existing patterns of development and pressure across Moray and for each Housing Market Area. The environmental and natural assets is discussed with reference to Special Landscape Areas, Countryside Around Towns, soils and draft Moray Woodland and Forestry Strategy are referenced. As identified in schedule 9 Rural Homes the lack of 2022 census data is cited as a gap in evidence. When this is published analysis will require to be undertaken to see how rural populations have changed over time.

- **Highlands and Islands Enterprise agree with the sensitivities in relation to impact of tourism and coastal areas but note that tourism is a significant income generator. They also comment discussions with energy developers should take into consideration of opportunities to maximise economic and social benefits from the supply chain and community organisations.**

Schedule 16 Tourism

Information from the Visit Moray Speyside Tourism Business Improvement District Business Plan and the Quarterly Visit Moray Speyside Business Barometer is summarised. The Moray Routes Development Plan and Rural Tourism Infrastructure Fund is also discussed. Links are also made to the draft Moray Woodland and Forestry Strategy, Moray Economic Strategy, Moray Growth Deal and Moray Business Property Needs Study. The Strategy for Tourism Development in Moray is noted as requiring updating.

- **Visit Moray Speyside noted their agreement with the sufficiency of the evidence base.**

Schedule 17 Culture and Creativity

The summary of evidence is informed by a cultural sector mapping report that was commissioned as part of the Cultural Quarter Growth Deal project. This provides an understanding of the cultural venues and groups across Moray. The work under the Moray's Great Places project is described noting the history, traditions and cultural events promote through this which has already informed the development of Town Centre Improvement Plans. The schedule also discusses the Forres Conservation and Heritage Scheme, Local Place Plans, Moray Economic Strategy 2022, the Strategy for Tourism Development in Moray, the Elgin City Centre Masterplan and Cultural Quarter Growth Deal project.

- **The Senior Manager for the Cultural Quarter project has agreed the evidence base and identified additional evidence that has been incorporated.**
- **The Moray Society provided additional comments on the importance of Elgin Museum.**

Schedule 18 Minerals

The schedule sets out a summary of evidence from the 2019 Aggregate Minerals survey for Scotland and the Moray Minerals Audit 2023.

- **No statements of agreement or dispute were made.**

5. Legislative Requirements

The matters identified in Section 15(5) of the Town and County Planning (Scotland) Act 1997, as amended, which the Council must set out its view on in the Evidence Report and which must be taken into account in preparing the new LDP's spatial strategy and the corresponding Schedules or Sections of the Evidence Report are set out below:

Section 15(5) of the 1997 Act, as amended	Schedule or Section of Evidence Report
The principle physical, cultural, economic, social, built heritage and environmental characteristics of the district	Schedules 1-18
The principal purposes for which the land is used	Schedules 1-18 + Appropriateness of the LDP2020 Spatial Strategy, Policies and Proposals
The size, composition, health and distribution of the population of the district	6 Design, Quality and Place 8b Specialist Housing 10a Infrastructure
The housing needs of the population of the area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people	8a Housing Land 8b Specialist Housing
The desirability of allocating land for the purposes of resettlement	9 Rural Housing
The health needs of the population of the district and the likely effects of development and the use of land on those health needs	6 Design, Quality and Place 7 Local Living 10a Infrastructure
The education needs of the population of the district and the likely effects of development and use of land on those education needs	7 Local Living 10a Infrastructure
The extent to which there are rural areas within the district in relation to which there has been a substantial decline in population	9 Rural Housing
The capacity of education services in the district	10a Infrastructure
The desirability of maintaining an appropriate number and range of cultural venues and facilities (including, in particular, but not limited to live music venues) in the district	17 Culture and Creativity
The infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education systems)	10a Infrastructure 10b Transport
How that infrastructure is used	10a Infrastructure 10b Transport
Any change which the planning authority thinks may occur in relation to any of the matters mentioned above.	Schedules 1-18 + Main Issues Arising from the Evidence

6. ENGAGEMENT STATEMENT

INTRODUCTION

Extensive engagement was undertaken to support the preparation of the Evidence Report. This statement sets out how the Council has sought stakeholder views in the preparation of the Evidence Report and how these views have been taken account of.

The graphic below sets out the key stakeholders and target audience for engagement, the varied methods used that were tailored to specific stakeholders and an indication of the reach of engagement. Further detail is set out in the body of the statement.

Evidence Gathering and Evidence Report Stage Engagement
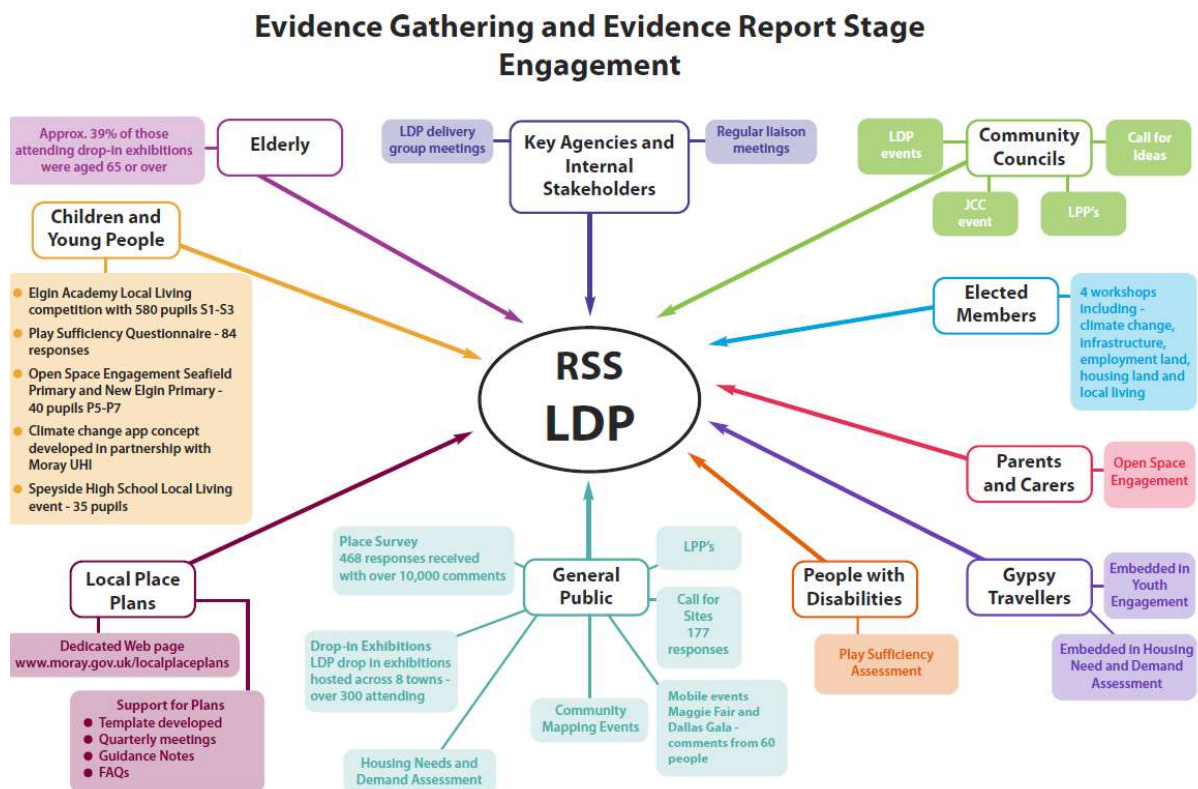
The Town and Country Planning (Scotland) Act 1997 as amended requires the Council to seek the views of identified groups including the public at large, children and young people, disabled people, Gypsies and Travellers, Community Councils and Key Agencies.

The following sections of this statement detail engagement undertaken for each group and how this has been taken account of in the Evidence Report. Appendix 1 sets out the engagement undertaken in a table.

CHILDREN AND YOUNG PEOPLE

Extensive youth engagement was undertaken reaching over 650 children and young people in P5 to S6.

PRIMARY

Primary aged engagement focused predominantly on play spaces working with children from two primary schools in the north and south of Elgin. Pupils were given a cut out of a t-shirt for top things about play areas and a cut out of trousers for pants things about play areas as a fun way of capturing their comments. In addition to this mapping of where children play was undertaken for Elgin North and Elgin South.

Evidence Report

The information gathered directly influenced the approach to identifying informal play areas for the Play Sufficiency Assessment. An audit and site visit to a local park was also undertaken by primary school pupils from one school to inform survey work for the PSA.

SECONDARY

Two local living inspired events were undertaken with local secondary schools in Elgin and Aberlour. One of the events was a full school day with 600 students having sessions with experts on topics such as renewable energy, active travel, biodiversity, infrastructure and housing in the morning and using this knowledge to design their own 20 minute neighbourhood in the afternoon.

The key messages that came out of the Elgin session were the need to address homelessness with more affordable housing, bringing existing homes back into use and specialist housing for the elderly. Increasing biodiversity enhancement opportunities by increasing the number of allotments, ponds, wildlife areas and encouraging wildlife into existing parks featured heavily. The need for more recreational facilities was also a high priority including more leisure and sports facilities including astro pitches, basketball courts and swimming pools.

As part of the session pupils completed a Place Survey based on the Place Standard and over 10,000 comments were gathered. The key headlines reinforced the desire for more recreational facilities that are well maintained, secure and safe.

A summarised version of this engagement was undertaken at Speyside High School in a rural area with a smaller group of 35 young people. The key messages that came across were slightly different from Elgin. Promoting tourism opportunities for the local economy was identified as a way to capitalise on the River Spey for water sports and Speyside as a brand. Public transport was highlighted as an issue, specifically the lack of evening and weekend services and connectivity to train services to access Inverness and Aberdeen.

Evidence Report

Given the feedback from these sessions was site specific it is not necessarily directly attributable to the Evidence Report but there is a strong alignment with the key issues in terms of delivering affordable housing, addressing the climate and nature crises, creating conditions for local living and taking an infrastructure first approach.

HIGHER EDUCATION

The Council worked in partnership with Moray UHI to develop/design a climate change game that would be delivered through an app for an audience of children and young people. Computing and Digital Design students created graphic content for a concept app setting out strategies to address climate change and the Council chose the best concept. Due to issues with resources, licensing and data sharing the app was never fully developed.

DISABLED PEOPLE

Engagement with an Additional Support Needs (ASN) parent and carer group through a Play Sufficiency Assessment Survey highlighted the limited inclusive and wheelchair accessible play opportunities within Moray. The comments provided identified the needs of different groups with reference to the needs of children with autism, mobility issues and wheelchair users.

As part of the engagement for the Housing Need and Demand Assessment a survey was undertaken as part of wider work to inform requirements for wheelchair accessible housing.

Evidence Report

Feedback from the ASN group was embedded within the Play Sufficiency Assessment that forms part of the Evidence Report. As set out in schedule 8b Specialist Housing as part of the HNDA evidence base, a calculation was carried out to provide estimates of the requirement for accessible housing in Moray over the next 5 years that will feed into the next plan.

GYPSIES AND TRAVELLERS

Interviews were undertaken with gypsy/traveller families on private sites during the preparation of the Council's Housing Need and Demand Assessment (HNDA). Extensive youth engagement was undertaken in Elgin that has the highest number of unofficial sites used by travellers. Although engagement did not explicitly seek comments from gypsies and travellers, it is considered that their views will have been embedded within the survey information and feedback received.

Evidence Report

The accommodation needs of gypsy/traveller families has been taken account of through the Housing Need and Demand Assessment which has suggested one or two sites with 15-20 temporary and permanent pitches.

COMMUNITY COUNCILS

Community Councils were invited to attend engagement events and to make submissions to the Call for Ideas to highlight the key issues and concerns of their communities. A meeting was held with the Joint Community Councils in February 2023 on the new LDP process and another meeting is scheduled in May 2024 on the Evidence Report. It was considered this was a more appropriate and meaningful way to engage Community Councils in gathering the evidence to inform the new LDP as the technical nature of the Evidence Report would likely inhibit participation. This was highlighted by Finderne Community Council who considered there was too much information to digest following consultation on the Energy Schedule of the Evidence Report.

Evidence Report

There was representation from Community Council's at the LDP drop in exhibitions and comments/issues raised have been embedded within this statement and have been used to inform the Evidence Report and will shape the place based plan.

LOCAL PLACE PLANS

In February 2023, the Council wrote out to all Community Council's and issued a press release and social media posts highlighting the opportunity for constituted community bodies to formally express an interest in preparing a Local Place Plan (LPP). To date one Local Place Plan has been submitted and is being reviewed by the Council and 6 community groups have committed to preparing a plan. In addition to this there are expressions of interest from a further 4 groups including two Community Councils.

The support offered by the Council to assist communities to prepare their LPP includes the creation of a dedicated webpage www.moray.gov.uk/localplaceplans and email address. The webpage includes a FAQ's section, linkages to Local Place Plan (LPP) Scottish Government draft guidance, a resources section is currently being developed to signpost communities to information including up to date community plans. This statement will also be placed on the webpage as useful information in terms of community views. An LPP template and engagement table have also been created and added to the webpage as well as being circulated to all community groups who have expressed an interest to date. In addition to this a series of quarterly meetings have been hosted by the Strategic Planning and Development Team. An online session was held in September 2023 providing an overview of the requirements of LPP and timeframes for submission. The proposed timelines to inform the Moray Local Development Plan 2027 seek a draft LPP by September 2024 for review by the Council with a finalised version submitted by the end of 2024. An in person session was hosted in Jan 2024 focusing on establishing readiness to prepare the plans and support needed from the Council. It is important to manage expectations in terms of support being subject to resource availability and the Strategic Planning and Development Team has been working closely with colleagues in the Community Support Unit (CSU) to maximise opportunities. The next quarterly meeting is scheduled for the end of April 2024 and will focus on engagement, key issues and information needs to feed into LPP.

LPP Meeting dates	Format
28th September 2023	Online session introduction to LPP
29th January 2024	In person Elgin Library Gallery – readiness to prepare and support needs
30th April 2024	In person Elgin Library Gallery - engagement, key issues and information needs
June 2024 - date tbc	In person - tbc
September 2024 – date tbc	In person - tbc

KEY AGENCIES

The Key Agencies have been consulted on the relevant Schedules of the Evidence Report and involved in the preparation of a number of the studies cited in the Schedules that will become evidence to inform the new LDP.

Evidence Report

Key Agencies views and how these have been taken into account are recorded in the statements of agreement or dispute within the schedules.

PUBLIC

LDP EVIDENCE REPORT DROP IN EXHIBITION ENGAGEMENT EVENTS

Eight drop in exhibitions were hosted across Moray from March to September 2023. Council Officers also attended two annual community events. The drop in events were widely promoted through press releases, social media posts and working with colleagues in the Community Support Unit to circulate to local networks. Overall, the events were well attended, and officers engaged with over 360 individuals.

The exhibition materials at the drop in events provided information on region wide issues and investment alongside local issues and explained the positive role of the Local Development Plan in

delivering high quality places and better communities. The opportunity was also taken to promote Local Place Plans.

The responses from the LDP exhibitions hosted across the 8 towns were collated and summarised to provide a snapshot of community views on an area and topic basis. See section below.

CALL FOR IDEAS

In February 2023, a Call for Ideas was launched which sought ideas on how to shape Moray. The Call for Ideas was promoted through press releases and on the Council's social media with emails sent to all contacts on the LDP mailing lists. A total of 195 submissions were received and there are similarities with comments raised at the LDP Drop in Exhibition events.

The sections below summarise the key issues/ideas raised at the events and Call for Ideas and where applicable where these have been taken on board within the topic based Evidence Report.

AREA BASED RESPONSES

ELGIN LOCAL HOUSING MARKET AREA

ELGIN

In Elgin, the focus was on the city centre. Issues raised included upgrading/expansion of the bus station or relocation closer to the train station. Addressing parking within the town centre, providing free parking and increasing disabled parking were seen as a priority. Introducing traffic control measures within the town centre to allow outdoor dining and other activities was supported. The continued need for a further crossing over the A96 connecting the north and south of Elgin was raised. In terms of active travel, the need for a cycle/pedestrian path from the business park back into Elgin was identified alongside general improvements to cycleways and more cycle parking. The cost, frequency and lack of connected public transport featured prominently.

Many ideas for improvements to the city centre were put forward including, relocating existing businesses from the St Giles Centre into the High Street and finding an alternative use for the building. The need to improve the appearance of the town centre featured heavily with suggestions to tidy up buildings, replace street furniture and signage, provide additional lighting and install public art. The lack of toilet provision outwith the St Giles Centre was also raised as a concern. There was support for regenerating Cooper Park Pond, the wider parkland including biodiversity enhancements and bringing Grant Lodge back into use. Young people highlighted the need for more leisure and entertainment facilities including astro turf pitches, basketball courts, outdoor cinema and street food outlets.

LOSSIEMOUTH AND THE COAST – BURGHEAD, HOPEMAN AND CUMMINGSTON

LOSSIEMOUTH

There was a focus on tourism and Lossie becoming a tourist destination with suggestions for the creation of an activity hub for cycling, paddleboarding and sailing. Furthermore, the need for a campsite for campervans, tourers and tents was raised multiple times with Sunbank identified as a potential location with reference to its community, amenity and wildlife value. The refurbishment of toilets was seen as essential to support tourism and the need to balance car parking with seating areas and pedestrianisation to enhance the overall appearance and use of the beach front promenade. Enhancing the accessibility of local beaches for wheelchair users was also suggested.

The lack of youth facilities specifically a youth café was raised as an issue and Station Park was identified as needing redevelopment/improvement. Several vacant buildings in the town were earmarked as being suitable for community use.

BURGHEAD, HOPEMAN AND CUMMINGSTON

Within the coastal villages outwith Lossiemouth the main issues identified were the lack of connectivity by public transport along the coast. The lack of access to affordable housing and the impact of Airbnb and second home ownership was highlighted. In Burghead and Hopeman there were concerns relating to the erosion of services with reference to loss of GP surgery, post office services and general decline in shops and services. The need for a community hub/meeting place was identified in both Burghead and Cummingston alongside improved facilities for children and young people. There was a desire for the Council to support progression on the Hopeman to Lossiemouth cycle route. Concerns were raised regarding coalescence of the villages and the need to maintain separation.

MILNES AREA – FOCHABERS, MOSSTODLOCH, LHANBRYDE, URQUHART AND GARMOUTH

FOCHABERS, MOSSTODLOCH AND LHANBRYDE.

FOCHABERS

There was a focus on the lack of recreational facilities for young people. Suggestions for improvements included expanding the play space at the playing fields and increasing the number of pieces of equipment, refurbishing the toilets and tennis courts. For older children, the need for teenage hangout, bouldering, climbing wall etc was raised alongside upgrading the existing astroturf, gym and addressing the lack of a swimming pool in the area.

LHANBRYDE

A significant deficit of facilities for physical activity were identified in Lhanbryde with suggestions including skate park, mountain bike tracks, BMX track, gym and tennis courts to address this.

MOSSTODLOCH

In Mosstodloch concerns were raised that any expansion of the village would need to include a new school as the existing school and Milnes High School are not fit for purpose. It was highlighted that the GP surgery at Fochabers Medical Practice cannot cope, and GP provision would need to be expanded to support growth. Furthermore, existing shopping facilities are insufficient to support an increase in population. Reference was also made to inadequate public transport provision.

GARMOUTH

In Garmouth there was a focus on lack of services and facilities. The need for a covered meeting area for older kids and not just toddler parks in new developments alongside the need for an indoor space for kids in winter was identified. There was also reference to having the toilets open in the winter and establishing a community hub. The lack of services including a shop for everyday essentials was raised repeatedly and the lack of local schools, GP surgery and this leading to isolation and lack of interaction. Public transport to Elgin was identified as an issue as timings and no weekends service restrict young people having access to employment and services. The cost of public transport was identified as a barrier and M-Connect supplementing existing bus services as an opportunity. It was highlighted that there is no direct bus service to Fochaber GP surgery. In terms of active travel there was a desire for more connecting routes including Garmouth to Lossiemouth,

Garmouth to Lhanbryde then Elgin, and Garmouth to Mosstodloch as a safe route to school. Lack of funding for EV charging infrastructure was also raised.

FORRES LOCAL HOUSING MARKET AREA

FORRES

In terms of housing the need for more affordable housing, rental properties and increased funding for social housing was identified. Suggested improvements to the local housing market included increasing the choice and mix of housing to encourage downsizing, setting up housing co-operatives, mutual home ownership schemes, promoting self- build, better designed accessible housing and development of tiny houses. The opportunity to re-use and reutilise existing buildings including homes above shops and bringing students to live in the town centre were also identified.

There were opportunities identified in relation to a new Forres Academy including co-location with other public services, the creation of a community hub with skate park, and outdoor gym set within a high quality open space. This was seen to help address issues raised in terms of the lack of leisure facilities and free activities for young people.

In terms of community facilities, the need to invest in community halls for example Rafford and Dyke to support connected community hubs was identified. Concerns were raised about service provision at proposed Lochyhill and Forres Enterprise Park developments, with a lack of amenities in the town to support such expansions. The lack of childcare facilities and the need to increase social enterprise for childcare was highlighted. Improved healthcare, education and facilities in general were also highlighted as a pressing need to support attraction and retention of people in the Forres area.

Regarding transport and active travel an improved active travel connection between Rafford and Forres was suggested alongside, EV charging within the town in better locations, bike hire and Moray Car Share being expanded in High Street location. The decline in public transport was raised as a concern including lack of connectivity to Kinloss.

There was particular interest in greenspaces across Forres with a desire to connect them with wildlflower corridors and paths, alongside the identification of areas of open space that can be left to become wild areas. The lack of high quality open space in new developments as part of the South Forres expansion was raised including the lack of a hierarchy of open space and the need to learn from this. Future developments need to create high quality, multi-functional flexible open space that is maintained. The need to protect existing assets like Grant Park and not overburden with additional uses was raised alongside the importance of Market Green to the setting of Forres. The need to improve the play offer in Grant Park was identified alongside the creation of a biodiversity corridor within the park.

Town centre regeneration ideas included re-opening Falconer Museum, upgrading toilets and alternative new toilet provision in the High Street that is open in the evenings. There is a demand for theatre, cinema, art and exhibition space that needs to be supported and there were suggestions around a Midsteeple Quarter type project.

DALLAS

Concerns were raised regarding the lack of progress in developing the brownfield sites in Dallas which are an eyesore. The lack of facilities for older children was highlighted and the need for a teen hangout area and provision for basketball and football.

BUCKIE LOCAL HOUSING MARKET AREA

BUCKIE

There was a focus on ideas for improving Buckie, active travel enhancements included developing a footbridge that is fully accessible and lit crossing the Buckie Burn and joining into Munro Way creating an east/west connection. Improvements to greenspaces within Buckie were also identified including additional seating, allotments, gym and improved lighting were suggested within parks. Other ideas included redeveloping the outdoor pool at Strathlene, creating outdoor cooking areas and hosting festivals to showcase local produce, the area and the coastline. Better more attractive lighting a Cluny Square was also referenced. The need for upgrading infrastructure to support new development in Buckie was also identified and questions raised around the suitability of the secondary school to support new development.

PORTGORDON

Concerns were raised regarding poor internet connectivity, the lack of bus stops in the village and the need to make improvements to enhance the physical ability of residents to move around Portgordon given the gradients. Supporting community ownership and plans for Portgordon harbour was identified as a priority.

SPEYSIDE HOUSING MARKET AREA

ABERLOUR, ARCHIESTOWN AND DUFFTOWN

Within the Speyside area the affordability and availability of housing for locals and young people was a major concern with the demand for housing outstripping supply leading to young families leaving the area. A potential solution identified was utilising empty homes. Not unlike other communities across Moray the lack of facilities for both locals and tourists was identified as a concern with reduced postal and banking services. Young people highlighted the tourism potential of the River Spey and the opportunity for water based activities. The lack of leisure and recreational facilities was also raised with need identified for more youth club provision, eateries, cinema, gym and pop up shops. Poor broadband connectivity was highlighted as an issue. The restoration of the Clocktower in Dufftown was a suggested improvement alongside the upgrading of football pitches to astroturf. In terms of the economy a green energy hub in Speyside was suggested that promotes local innovation and creates exciting jobs for young people to get them to stay or come back to the area. Poor public transport connections, a new active travel route linking Aberlour and Archiestown and upgrading of existing routes were raised as issues alongside various road safety concerns.

KEITH HOUSING MARKET AREA

KEITH

There was a focus on transport with road safety concerns raised at the schools and A96. A number of active travel improvements were identified for example connections east to west in the town as well as upgrades to existing paths and ongoing maintenance.

In terms of facilities the reopening of toilets, a water stand in the Square and additional EV charging points was raised. The reuse of existing buildings was seen to support local businesses and provide housing and repurposing the resource centre was also raised. There were also concerns in respect of the amount of energy infrastructure work happening in and around Keith.

Evidence Report

The site specific comments above have informed the evidence for the new Plan and will be used to create the place based plan.

TOPIC RESPONSES

TACKLING THE CLIMATE AND NATURE CRISIS

There is support within communities for the creation of a wildlife corridor/pollination corridor along the Moray Coast. The development of a Pollinator Strategy for the area was raised. Ideas for mitigating climate change and enhancing biodiversity included allowing all road verges to grow**,** planting more trees, expanding woodland cover and social just use of Council owned land. Engaging with local industry e.g. Baxters, Walkers and Johnstons to sponsor vast wildlife areas was suggested.

Increasing the use of renewable energy including hydrogen for transport was raised multiple times, although not all supportive of wind energy. Upgrading all existing housing stock and supporting all village halls and community buildings to be net zero with insulation, solar panels and heat pumps was identified as a key action. Furthermore, all housing should be built with solar panels as standard, internal and external insulation and other renewables. Community energy schemes were seen to reduce bills, create jobs and reduce fuel poverty. Creating local renewable energy hubs was suggested to demonstrate technologies that could be adopted by volume builders. An opportunity was identified for covered solar panel/supplemented by recycled car batteries for electric vehicle charging across Moray.

The Call for Ideas also generated a lot of suggestions to help address the climate and nature crises. Ideas included the creation of a Findhorn to Spey nature network along the coast and one linking into Cairngorms National Park. There is a desire for Moray to become an area of environmental interest and safeguarded with development to attract green tourism. There was also reference to the coast having national park status and an aspiration for Moray to be identified as the first "Rewilding Council" in Scotland.

A suggestion was made for Moray to be a leading demonstration Council in Scotland (and in Europe) in terms of climate resilient, flourishing new (green) economy, demonstrating the empowerment and resilience of entrepreneurial, socially inclusive, community-led, net zero, ecologically regenerative development and innovation. A further idea was to set up a Moray renewable energy company as a public generator of energy.

Evidence Report

Schedule 1 Climate Change sets out ongoing work by the Council that contributes to addressing the climate change crisis and will help deliver many of the ideas and comments including the Forestry and Woodland Strategy, Moray Hydrogen Strategy and the Natural Capital Assessment. These are important pieces of evidence that will inform the direction of the new plan.

INFRASTRUCTURE

In terms of Moray wide infrastructure requirements there was reference to ensuring high quality internet provision across the region. The need for better healthcare facilities at Dr Grays including more parking, better maternity and mental health services was identified. All communities highlighted the lack of healthcare facilities within towns and villages and need for more to support new housing development. Addressing the affordability and availability of nursery places and increasing opportunities for outdoor learning and early years STEM was also raised as an issue.

The Call for Ideas generated the following ideas for creating better communities. The need for facilities including the provision of more childcare facilities and nurseries, GPs, chemists and shops was identified. There was a desire for schools to act as hubs for neighbourhoods and need for new arts/culture facilities and provision of multi-purpose adaptable venues. Additional gym and leisure facilities alongside more play park provision was highlighted as important to support health. The need for the provision of bus shelters in rural areas was also identified.

Evidence Report

Schedule 7 Local Living identifies a number of implications for the next LDP that reflect these comments. This includes providing opportunities for appropriate educational facilities including childcare opportunities embedded within communities. There is also reference to providing opportunities for community indoor space. Schedule 10a identifies childcare provision as an issue and that a working group has been set out to explore potential solutions and this will be embedded into the LDP 2027. An evidence baseline of healthcare provision has also been set out within the schedule and the spatial implications of NHS Grampian healthcare estate decisions and investment will be identified in the LDP 2027.

SUPPORTING EMPLOYMENT, BUSINESS AND INDUSTRY

The economic opportunities associated with tourism in Moray featured with explicit reference to investing in green tourism and the potential for Moray to be a leader in this area. There was support for a Moray Coastal Natural Heritage Park and the associated benefits to wellbeing, tourism and the economy. Locations across Moray's coastal towns were identified as having potential as campsites.

The need to create more full-time jobs was identified noting the prevalence of part-time jobs in contributing to the high gender pay gap. Moray was seen to be an ideal location for remote workers, and this could be supported further by investing in broadband and co-working spaces closer to where people live. The economic, environmental and social benefits associated with investing in community energy schemes were highlighted as an opportunity a number of times. The wider distribution of windfarm community benefits across Moray to share the economic benefit was also highlighted.

Evidence Report

Schedule 11 Tourism acknowledges the importance of the tourism industry to the Moray economy and the need to identify suitable locations for tourism uses. Exploring the opportunity for a Moray Forest Park is also specifically identified.

HOUSING

Across the whole of Moray, a major concern raised was the lack of affordable housing. The housing market needs to be delivering a variety of housing tenures. There were significant levels of support for bringing vacant and derelict land back into use and utilising space above shops in town centres with reference to using compulsory purchase orders to achieve this. Concerns were also raised about protecting green spaces, wild land, agricultural land and minimising housing construction on greenfield land to avoid urban sprawl.

Evidence Report

Schedule 8b Specialist housing acknowledges the high levels of affordable housing need evidenced in the Housing and Need Demand Assessment (HNDA). It is proposed to continue with the current

local policy requirement for all developments of 4 or more houses to provide 25% affordable. There is also reference to potentially seeking higher contributions.

Schedule 8a Housing Land sets out a target of 10% is proposed of housing completions over the next 10 years being completed on brownfield sites and a target of 5% is proposed of housing completions over the next 10 years within town centres. This ambitious target can only be achieved through additional funding being sourced to meet the additional costs and challenges of developing brownfield sites and current viability issues.

TRANSPORT AND ACTIVE TRAVEL

There were concerns expressed regarding the cost of public transport and the need to invest in improved bus and train services across the region. The lack of public transport in rural areas and along the coast and reliability of service was a major concern. The opportunity for M-Connect to supplement existing bus services was identified with more investment to extend the service. Investment in new active travel routes to create connections within towns, connecting main towns to smaller surrounding villages and upgrading of existing networks was also highlighted as an issue. The need to repair Cloddach and Pittendreich bridges was identified.

In terms of the Call for Ideas suggestions primarily related to improvements to existing transportation infrastructure, such as tackling congestion on A96/ Dual A96/Bypass for Elgin and Keith and improving the A95, A98 and A941. The importance of dualling the A96 to provide safe connectivity in shaping the future of Moray was highlighted. Delivering better transport links to attract business was raised alongside the need for more/better active travel links across Moray and filling missing links. Ideas for public transport improvements included increasing the number of services, providing evening services and reinstating the rail connection to Dufftown. A general comment was made regarding reducing speeds in towns to 20mph.

Evidence Report

Schedule 10b Transport sets out that despite being a rural local authority Moray has relatively high statistics for Active Travel as a 'main mode of travel' than a large percentage of other local authority areas in Scotland. The schedule sets out the commitment to active travel and details planned and delivered investment in active travel routes to improve connectivity. Plans to expand the M-connect service are also referenced.

REGENERATING TOWN CENTRES AND PREVIOUSLY USED LAND

The need to support the nighttime economy and culture to increase footfall and vibrancy of Moray's town centres was viewed as being important. In terms of bringing sites and buildings back into use reference was made to clear advice and support from the planning service when developing brownfield sites. It was also identified that Developer Obligation exemptions for brownfield sites is needed otherwise these sites are unviable.

Ideas generated from the Call for Ideas included provision of pop up shops and smaller more affordable retail units to replace large national retailers that have left. The need to diversify uses in town centres such as event/recreation and hot desking spaces was raised. The redevelopment of town centres for residential, incentivisation of the redevelopment of brownfield land and stopping greenfield development was identified. Other enhancements included tidying up town centres and pedestrianisation incorporating tree/boulevard planting and seating. The redevelopment of the St Giles Centre was specifically identified as an opportunity for a market or gallery, as well as building an iconic inspirational new theatre/town hall.

Evidence Report

Schedule 14 Town Centres and Retail refers to the need to consider a new use for the St Giles Centre and delivery of Town Centre Improvement Plans and Elgin City Centre Masterplan. These adopted plans already identify many of the improvement ideas submitted for town centres. Supporting the development of brownfield sites is addressed in the housing section.

SAFEGUARDING OPEN SPACES AND LANDSCAPES

Extensive information was gathered from primary aged school children in terms of their views on play spaces where they live. The key issues raised include the lack of provision for different ages of children across play spaces, existing equipment needing to be replaced, the lack of natural/imaginative play opportunities, limited opportunities for exciting or challenging play, poor accessibility for wheelchair users and lack of equipment for those with disabilities. The lack of nature within wider greenspaces was also highlighted with suggestions for more tree planting and wildflower areas. In secondary aged young people, the focus was on the lack of recreational facilities in particular a need for more astro turf pitches, skateparks and a lack of pump tracks and covered teenage hangouts.

The Call for Ideas generated the following suggestions including embedding nature based solutions into development and new development to provide habitat/wildlife corridors, allotments, fruit trees, green/blue networks (swales, ponds, rain gardens, reedbeds), incorporate swift/bee bricks, and spaces for hedgehog movement.

Evidence Report

All the information gathered from the engagement with schools and surveys relating to formal and informal play has been taken on board and influenced the Play Sufficiency Assessment prepared to support the Evidence Report. The findings will inform future planning and policy decisions to create a more play-friendly community.

Schedule 2 Biodiversity, Natural Places, Green and Blue Infrastructure sets out that a study has been commissioned to help inform the development of a nature network/s across Moray. In terms of biodiversity enhancement in new developments the schedule identifies the need for improved site specific biodiversity plans that need to be deliverable and monitored. This approach will inform the future direction for the LDP 2027.

Appendix 1 Table of Engagement Events

Location	Format	Date	Exhibition or Event Content
Online Teams	Moray Council Community Engagement Group	10 January 2023	Presentation and seeking comment on Participation Statement in Development Plan Scheme 2023

Online Zoom	Joint Community Councils of Moray meeting	9 February 2023	Overview of proposed engagement for LDP. Overview of new process Identification early engagement opportunities
Forres Forres Town Hall	Drop in exhibition with community mapping sessions	Sat 4 March 10am – 3pm	Forres Town Centre Improvement Plan Active Travel improvements Regeneration proposals Forres Town Hall Forres Learning Estate Review Falconer Museum
Elgin Moray UHI	Market stall at launch of Community Engagement Strategy	Mon 20 March 12:30 – 4pm	Networking and sharing best practice. Overview proposed engagement for LDP.
Elgin Seafield Primary School New Elgin Primary School	Engagement session	22 March 2023	Mapping of informal play in Elgin North and Elgin South. Audit of good and bad of play areas
Aberlour Fleming Hall	Drop in exhibition	Sat 22 April 2023 10am – 3pm	Toilets consultation Moray Growth Deal – affordable housing project at Speyview Aberlour Aberlour Town Centre Improvement Plan Active Travel Food Growing?
Dufftown Mortlach Memorial Hall	Drop in exhibition	Thurs 27 April 2023 3 – 8pm	Moray Growth Deal/Dufftown and District Community Association – affordable housing project at Hillside Farm Dufftown Clocktower Dufftown Town Centre Improvement Plan

Elgin Elgin Town Hall	Town Centre Summit Exhibition	Thurs 4 May Lunchtime exhibition	Customised to town centres Regeneration/investment across Moray
Elgin Elgin Academy	Elgin Academy – 20 minute neighbourhood engagement	Mon 15 May 2023 All day event	Place survey based on Place Standard Elgin exhibition boards
Elgin Town Hall	Drop in Exhibition with community mapping sessions	Sat 27 May 2023 10am – 3pm	Elgin City Centre Masterplan Moray Growth Deal Elgin Specific projects Levelling Up Fund projects
Lossie Town Hall	Drop in exhibition	Sat 17 June 2023 10am – 3pm	Lossie Town Centre Improvement Plan Lossie to Hopeman Active Travel Route
Fochabers Fochabers Institute	Drop in exhibition	Thurs 22 June 2023 4-8pm	Mosstodloch Masterplan
Aberlour Speyside High School	Engagement session on local living in a rural context	Speyside High School 23 June 2023	Local living presentation Facilitated sessions to draw up plans for Aberlour to support local living.
Maggie Fair (market stall booked)	Stand with information on Local Place Plans and identifying key issues for LDP	Saturday 24 2023 June 1-4pm	Pop ups on LPP and LDP
Dallas Gala (market stall booked)	Stand with information on Local Place Plans and identifying key issues for LDP	Sunday 2 July 2023 1 - 4pm	Pop ups on LPP and LDP
Buckie North Church Hall (booked via Tracey R)	Drop in exhibition	Sat 26 August 2023 10am – 3pm	Buckie Town Centre Improvement Plan Buckie Harbour Masterplan Active travel improvement projects
Keith Longmore Community Hall	Drop in exhibition	Sat 9 September 2023 10am - 3pm	Keith Town Centre Improvement Plan Blackhillock Masterplan

Burghead Community Hall	Coffee morning	Sat 4th November 2023.	Gather views/comments from Burghead community
Joint Community Councils of Moray (JCC)	Meeting	9 May 2024	Evidence Report

7. Evidence Report Schedules

Issue: Topic / Place	1. Climate Change, Adaptation
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15 (5)- the principal physical and environmental characteristics of the district • Section 3G- policies regarding low and zero carbon generating technologies in new buildings. • Section 15(5)- the infrastructure of the district (including systems for the supply of water and energy)
Links to Evidence	**CD007** Moray Climate Change Strategy 2020-2030 **CD008** Climate Change Routemap 2023 Action Update **CD009** Scottish Climate Change Adaptation Programme (2019-24) **CD010** Moray Council draft LHEES and Delivery Plan April 2024 **CD011** Measuring nocturnal near surface urban heat island density in the small, mid latitude city of Inverness, George Gunn 2023 **CD012** Natural Capital Report Moray Council April 2024 **CD013** UK Local Authority and Regional Greenhouse Gas Emissions National Statistics 2005 -2021 **CD014** Local Government Benchmarking Framework

National Planning Framework 4 (NPF4) Context

National Planning Framework 4 has significantly increased the requirements relating to carbon reduction, renewable energy generation and biodiversity enhancement through the planning system including the following requirements;

- LDP's must address the global climate change emergency and nature crisis by ensuring the spatial strategy will reduce emissions and adapt to current and future risks of climate change by promoting nature recovery and restoration.

- Spatial strategy should be designed to reduce, minimise or avoid greenhouse gas emissions, guiding development to sustainable locations. The strategy should be informed by an understanding of the impacts of the proposals on greenhouse gas emissions.

- Set out opportunities for the sustainable reuse of brownfield land including vacant and derelict land and empty buildings.

- *Consider how to adapt coastlines to the impacts of climate change. This should recognise that rising sea levels and more extreme weather events resulting from climate change will potentially have a significant impact on coastal and island areas.

- (NPF4 requirements relating to nature networks, energy, sustainable transport, and woodland all feature in separate schedules in the Evidence Report).

Summary of Evidence

Climate Change (Scotland) Act 2009

The Act places a statutory duty on all public bodies to act to deliver on the national climate change targets. Scotland aims to reduce greenhouse gas emissions by 75% by 2030 and to reach net zero by 2045.

Under the Act, Moray Council has three main duties;

- **Mtigation:** To contribute to reducing greenhouse gas emissions.
- **Adaptation:** To help Moray adapt to the changing climate
- **Sustainability:** To act in a sustainable manner.

The council must report on compliance with these duties annually in accordance with the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015 and subsequent amendments.

This council is required to provide the following information in annual climate change reports:
- its target date for achieving zero direct emissions;
- its targets for reducing indirect emissions;
- how its targets will align spending plans and use of resources to contribute to reducing emissions.
- how it will publish progress to achieving emissions reduction targets; and
- what contribution it has made to helping deliver Scotland's Climate Change Adaptation Programme.

Sources and scale of carbon emissions in Moray

In 2020, Moray emitted around 788,000 tonnes of carbon dioxide equivalent (tCO2e). The main sources of carbon emissions in Moray are:
- **Industry and commercial:** This sector accounts for over a third of all emissions in Moray. The region's prominent whisky distilling industry and broader food and drink production heavily rely on electricity and natural gas. Additionally, energy intensive defence sites at Lossiemouth and Kinloss contribute to these emissions.
- **Agriculture:** Agriculture is the second largest source, responsible for approximately 32% of Moray's total emissions. In comparison, Scotland's agriculture emissions stand at 20%. This disparity reflects the scale of agricultural operations in Moray. Emissions originate from livestock, soils, operations, and the use of fertilisers and pesticides.
- **Domestic sector:** Domestic emissions are the third largest source of emissions, constituting 20% of the total emissions. Use of natural gas and electricity is significant, primarily due to the region's cold climate and the need for heating throughout several months of the year. Many properties in Moray are not connected to the gas grid and rely on kerosene and tanked gas for heating purposes.

- **Transport:** The rural nature of Moray leads to a high volume of vehicular traffic across the region, resulting in significant carbon emissions. Moray's rail network lacks electrification, and the absence of efficient rail freight handling facilities contributes to a high number of HGV journeys within and passing through the region.

The Local Government Benchmarking Framework shows that Moray produces 6.39tCO2e emissions area wide within scope of LA per capita which ranks the area 32nd, lowest of all Local Authority areas.

Moray Council Climate Change Strategy

The Strategy is designed to provide a co-ordinated and appropriate response to help deal with the challenges that climate change is expected to bring. On the 27 June 2019, Moray Council declared a Climate Change Emergency. It was agreed that a Climate Change Strategy and action plan would be prepared and adopted with the aim of Moray Council becoming carbon neutral for direct emissions

by 2030. Further that the Council would work with the wider community to promote and facilitate local action on Climate Change.

The Moray Climate Action Network was founded and is hosted by tsiMoray and serves as a cross sector creative co-ordination group to deliver action to support a just and green recovery.

The Climate Change Plan and Routemap to Net Zero complements the strategy by providing an annual update on progress, actions and the way forward. The Routemap is reviewed regularly to inform future reviews and updates to the Strategy.

Adaptation

Likely Climate Risks

Adaptation Scotland highlights 15 key consequences from the Scottish Climate Change Adaptation Programme (2014). Moray faces several climate risks including:

- **Increased temperatures:** Moray is already experiencing warmer winters and hotter summers. This trend is projected to persist, posing substantial implications for the region's environment and economy. For example, warmer winters could result in an upsurge in pests and diseases, while hotter summers intensify the occurrence of droughts and wildfires.
- **Changes in rainfall patterns:** Moray is expected to undergo shifts in rainfall patterns, potentially leading to more frequent flooding and droughts, as well as changes in the timing of the growing season.
- **Increase in sea levels:** As a coastal region, Moray is vulnerable to the consequences of rising sea levels which could result in further coastal flooding, erosion, and damage to infrastructure and property.
- **Higher frequency of extreme weather events:** The frequency and intensity of extreme weather events such as storms, floods, and droughts has risen in recent years. If this trend persists as predicted, it could inflict further substantial damage to property, infrastructure, and even loss of life.

It is imperative for Moray to take measures now to reduce emissions and adapt to the broader consequences of climate change.

Climate Risks

- Because UK buildings were not generally designed for these extremes, there will be a greater risk to vulnerable people during events such as heatwaves or winter storms that cause power cuts. Storm Arwen saw people without power for up to two weeks. The elderly, young children, and those with underlying medical conditions or reduced mobility will be most affected. Milder, wetter winters may increase the health risks associated with damp and mould, similarly affecting already vulnerable people more.
- Of major concern is the threat to local food security linked to increased pests, disease, and damage to soil health and ecosystems, although the growing season may lengthen with warmer average temperatures. Global food supplies will likely be disrupted, and costs increase as other regions experience even more intense climate impacts than we do.
- There may be water shortages which would impact households as well as agriculture and locally important industries such as distilling which rely on large supplies of water during processing.

The Moray Climate Change Strategy, the Local Development Plan and the Regional Spatial Strategy present opportunities to combine work streams and projects to reduce costs of adapting to climate change. These opportunities include:

- Nature based solutions.
    - Riparian planting to reduce flood risk, restore biodiversity and sequester carbon.
    - Greening around buildings, to create shade, reduce heat, wind, surface water flooding, increase biodiversity and enhance wellbeing and mental health, and curriculum for excellence in outdoor learning in a school playground setting.
- Adapting buildings to cope with heatwaves and flood risk when making other planned upgrades.
    - Building design (solar gain, shade, ventilation), retrofitting, transport and connectivity (community hubs), local energy (islanding/ solar with battery relay), EV charging (air quality/ health improvement)
    - Location and siting of buildings and infrastructure – avoiding coastal/flood risk, flood protection, travel hubs, community hubs, brownfield development, soil management.

The issue of urban heat has been further highlighted in a report published by the UK Health Security Agency 2023 into the impacts on public health due to the warming climate, which suggests that 60,000 Europeans died in summer 2022 from heat related causes. The report projects that with a high emissions scenario, UK heat related deaths are estimated to increase by one and half times in the 2030's and by 12 times by 2070. The urban heat effect has been further highlighted at the local level in a paper published by George Gunn in 2023, which considered the urban heat island effect in Inverness. The study evidenced that more densely built- up urban areas returned the greatest urban heat island intensities, while conversely, areas of large urban greenspace were found to partially offset the effects, through cooling. Mr Gunn's study highlighted a need for spatial planning policy to reflect an awareness of urban heat within any size of settlement, with a focus on prevention. All of these reports highlight the important relationship between urban density, greenspace and human health which needs to be reflected and monitored through the Local development Plan.

Coastal Adaptation

A Regional Coastal Adaptation Plan (CCAP) and a first phase of five local plans were prepared in 2023 and a second phase of the remaining 11 is currently being progressed and will be reported to Council before summer 2024. The basis of the CCAP is to identify the risk and consequences of change to the coast.

Moray has been divided into 11 Local Plan Units along the coastline, with a Local Plan developed for each unit. Each Plan is further sub-divided into coastal management units (CMU's) which are created based on the type of material which makes up that section e.g. gravel/sands, Rock, Sea Defence, Vegetation. There is also the potential for a hybrid option for example if a rock armour section is present on a sandy beach. The Local Plans are:
1. Culbin
2. Findhorn
3. Roseisle
4. Burghead
5. Hopeman
6. Lossiemouth to Binn Hill
7. Kingston to Lower Auchenreath
8. Portgordon to Buckpool
9. Buckie to Portessie
10. Portknockie
11. Cullen to Muckle Hythe

Each CMU is allocated one of the following categories:
- No defence, no risk
- No defence, risk
- Defence, no risk
- Defence, risk
- Hybrid, no risk
- Hybrid, risk

The plans are developed in accordance with Moray Council's coastal erosion policy, NPF4, the Local Flood Risk Management Plan, the current Moray Local Development Plan, Dynamic Coast 2021 and Scottish Government Guidance on Coastal Climate Change Adaptation Plan (CCAP).

Local Heat and Energy Efficiency Strategy (LHEES)

The Local Heat and Energy Efficiency Strategies (Scotland) Order 2022 requires the council to develop plans to improve energy efficiency and reduce carbon emissions in buildings across Moray, to support the transition to net zero.
The LHEES is a long-term strategic framework for:
- the improvement of the energy efficiency of buildings in the Moray area, and
- the reduction of greenhouse gas emissions resulting from the heating of such buildings

The Local Heat and Energy Efficiency Delivery Plan will set out how Moray Council proposes to support implementation of its LHEES. A draft of the Plan will be reported to Council in April 2024.

Moray's LHEES is primarily driven by Scotland's statutory targets for greenhouse gas emissions reduction and fuel poverty:
- Net zero emissions by 2045 and 75% reduction by 2030.
- In 2040, as far as reasonably possible, no household in Scotland is in fuel poverty.

The strategy:
- sets out how each segment of the building stock needs to change to meet national and local objectives, including achieving zero greenhouse gas emissions in the building sector, and the removal of poor energy efficiency as a driver of fuel poverty.
- identifies strategic heat decarbonisation zones, and set out the principal measures for reducing buildings emissions within each zone; and

Accompanying this strategy will be the Moray LHEES Delivery Plan, developed in partnership with key stakeholders, to provide a strong basis for action for Moray communities, the Scottish Government, investors, developers and wider stakeholders, pinpointing areas for targeted intervention and early, low-regrets measures.

Heat Networks

The Heat Networks (Scotland) Act 2021 introduced powers to regulate the heat networks market in Scotland for the first time. Section 92 sets statutory targets for heat supplied by heat networks. These require the combined supply of thermal energy by heat networks in Scotland to reach 2.6 TWh of output by 2027 and 6 TWh of output by 2030. The Heat Networks (Heat Network Zones and Building Assessment Reports) (Scotland) Regulations 2023 came into force on 30 May 2023 and require local authorities to identify, consult on and designate potential heat network zones in their areas.

Heat Network Zones are areas particularly suitable for heat network development. The purpose of zones is to attract investment from heat network developers. Currently as part of the LHEES process potential heat networks have been identified in Elgin, Forres and Buckie. Other towns have areas that

do not meet the criteria set out in LHEES as being suitable for a heat network but are being considered as locations of interest if they have industries with waste heat or are off gas grid.

Natural Capital

A natural capital assessment was undertaken in 2023 which identified the opportunities for natural capital investment in Moray.

Natural Capital is the environmental resources, habitats and ecosystems from which a flow of social, environmental and economic benefits to people can be generated. Natural capital includes: air, water, minerals, soil, coast, woodland, grassland, heathland and farmland. Investing in the quality and expansion of natural capital assets can therefore realise significant benefits for humans and help to tackle the twin crises for climate and nature.

The natural capital report identifies priority areas for improvements, however further work is required to determine land ownership, undertake site surveys and other detailed assessment as required. It is unlikely that any developer contributions would be sufficient to achieve natural capital investment at the scale required and a range of funding mechanisms will be required.

Investments should align with recommendations and maps arising from the Woodland and Forestry Strategy and Nature Network development, both of which are outlined in separate schedules.

Regional Land Use Partnerships (RLUP)

RLUP's are being set up in Scotland to help achieve Scotland's climate change targets through land use change and a natural capital approach. These partnerships consist of local and national government, communities, landowners, land managers and a range of other stakeholders. Five RLUP pilots produced Regional Land use Frameworks using a natural capital approach which considers key natural assets and the benefits these provide to communities and the regional economy.

The 5 pilots in Scotland are:
- Cairngorms National Park
- Highland Council region
- Loch Lomond and the Trossachs National Park
- North East Region (Aberdeenshire and Aberdeen City)
- South of Scotland Region

Pilots were given the following specification regarding a natural capital approach:
- The pilots should adopt a broad natural capital approach, looking at our land as an asset that we need to protect and enhance so that it can continue to deliver a wide range of ecosystem service benefits such as food production, emissions reduction, carbon sequestration, climate adaptation, improved biodiversity and support for health and wellbeing through access to nature into the future.
- One element of this approach will be the identification of the potential for nature based solutions for climate change within the region such as woodland expansion, peatland restoration, natural flood management and greenspaces to reduce air pollution.

This approach isn't new and a number of partnerships exist across the UK with their aims differing slightly between each partnership, for example the Galloway Glens Landscape Partnership aim is to drive sustainable economic development by connecting people to their natural and human heritage. This approach can be explored through the Regional Spatial Strategy and Local Development Plan to support delivery of a natural capital approach which could be funded through future applications to the Just Transition Fund and potentially through a new regional approach to Socio Economic benefit funding.

Evidence relating to Renewable Energy, Forestry and Woodland, Biodiversity, Nature Networks and Peatlands are covered in other schedules, but all relate and support the Council's Climate Change Strategy and a RLUP could play a key role in delivery.

Summary of Stakeholder Engagement

Copies of the schedule were sent to the following organisations;
- Moray Climate Action Network
- Sustainable Scotland Network
- Adaptation Scotland

No statements of dispute were submitted.

Summary of Implications for the Proposed Plan

- The Proposed Plan to recognise the pivotal role it has in tackling climate change
- The Proposed Plan will need to consider a policy approach to implement NPF4 and deliver carbon offsetting if required
- The Proposed Plan will need to consider an integrated approach to land use planning and management to support the move to net zero and adaptation to climate impacts, and the merits of a Regional Land Use Partnership. The Proposed Plan to reflect the spatial outcomes from the LHEES Strategy and to identify potential Heat Networks
- The Proposed Plan to consider how to mitigate the effects of urban heat and link this to related work on quality green spaces and nature networks.
- The Proposed Plan to reflect the spatial outcomes from the Natural Capital Report
- The Proposed Plan to reflect the spatial outcomes from community led net zero projects.
- The Proposed Plan to manage and mitigate wider impacts of climate change, including infrastructure risks, community resilience, air quality and food availability

Statements of Agreement / Dispute

None identified.

Issue: Topic / Place	2. Biodiversity, Natural Places, Green and Blue Infrastructure
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, section 15(5)(a) 'the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district'
Links to Evidence	**CD015** Scotland Biodiversity Strategy and delivery plan 2045 Tackling the Nature Emergency in Scotland **CD016** North East Scotland Biodiversity Partnership 3 year Strategic Plan **CD017** North East Scotland Biodiversity Partnership habitat statements Foreword and Introduction **CD018** North East Scotland Biodiversity Partnership Habitat Statement – Wetlands Habitat Statement **CD019** North East Scotland Biodiversity Partnership Habitat Statement – Woodlands Habitat Statement **CD020** North East Scotland Biodiversity Partnership Habitat Statement – Marine and Coastal Statement **CD021** North East Scotland Biodiversity Partnership Habitat Statement – Grasslands Statement **CD022** North East Scotland Biodiversity Partnership Habitat Statement – Upland Heathland Statement **CD023** North East Scotland Biodiversity Partnership Habitat Statement – Built Environment **CD024** Moray Council Biodiversity Duty Report 2021-23 **CD025** Moray Council Biodiversity Study **CD026** Draft Moray Forestry and woodland Strategy 2024 **CD027** Moray Natural capital study **CD028** Moray Local Development Plan 2020 Monitoring Report 2023 **CD029** Moray Open Space Strategy - Supplementary Guidance - 2018 **CD030** Moray Core Paths Plan 2023 **CD031** Moray Food Growth Strategy 2020 **CD032** Play Sufficiency Assessment 2023 **CD033** Keith Green Energy and Infrastructure Framework – 2023 **CD034** Keith Green Energy and Infrastructure Framework – Appendix **CD035** Keith Green Energy and Infrastructure Framework – Appendix LSS **CD036** Moray Local Landscape Designation Review - 2018 **CD037** Moray Wind Energy Landscape Sensitivity Study – 2023 **CD038** Moray Council Planning and Regulatory Services Committee Meeting 19 December 2024 Planning Policy Guidance – Countryside Around Towns **CD039** Framework for Nature Networks in Scotland – Draft **CD040** Green Infrastructure: Design and Placemaking 2011 **CD041** Peatland, carbon-rich soils and priority peatland habitats Guidance **CD042** Moray Environmental Protected Areas Map Data Sets • Convention on Wetlands of International Importance: Ramsar sites

		- [Wildlife and Countryside Act 1981, as amended: Sites of Special Scientific Interest](#) - [Special Protection Areas](#) - [Special Areas Conservation](#) - [Nature reserves](#) - Moray wildlife sites - National-Scale Land Capability for Agriculture [Prime Agricultural Land](#) - Priority Marine Features - https://opendata.nature.scot/maps/0e722e3e911e424f8dacac5a587c0dfb/about - Habitat Map of Scotland: https://opendata.nature.scot/datasets/snh::habitat-map-of-scotland/explore - Scotland Land Cover Map 2022 - EUNIS Level 1: https://opendata.nature.scot/maps/scotland-land-cover-map-2022-eunis-level-1/explore?location=57.570685%2C-4.968950%2C6.92 - Scotland Land Cover Map 2022 - EUNIS Level 2: https://opendata.nature.scot/maps/scotland-land-cover-map-2022-eunis-level-2/explore?location=57.570685%2C-4.968950%2C6.92 - Scotland Land Cover Map – Change 2020-2022: https://opendata.nature.scot/maps/scotland-land-cover-map-change-2020-2022/explore?location=57.570685%2C-4.968950%2C6.92 - National Vegetation Classification (NVC): https://opendata.nature.scot/datasets/snh::nvc-habitat-polygons/explore?location=57.758912%2C-4.979327%2C6.94 - Geological Conservation Review: https://opendata.nature.scot/datasets/geological-conservation-review-sites/explore?location=52.187489%2C-6.472151%2C4.00 - Peatland https://opendata.nature.scot/search?groupIds=dc87e2f315c0452f8b2f2fbbfa0eabd4 including Peatland Action Depth and Condition: https://opendata.nature.scot/datasets/snh::peatland-action-peat-depth-and-condition/explore?location=57.684253%2C-4.102587%2C7.00 - SSW – Soil Map: https://soils.environment.gov.scot/maps/soil-maps/national-soil-map-of-scotland/ - SEWeb – BGS Bedrock: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/ - SEWeb – Superficial Layer: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/
National Planning Framework 4 Context		

This schedule covers several policy areas related to biodiversity, natural places, landscape, and green and blue infrastructure. It is acknowledged that each policy area has individual representation in NPF4 and the current local development plan, however there are significant overlaps between all these policies, therefore the following takes a holistic approach to understand the wider issues.

NPF4 includes a number of spatial principles and policies to protect and enhance natural heritage and biodiversity. There is a strong emphasis on climate change and tackling the nature crisis, this includes supporting development that has a positive effect on nature networks and nature-based solutions. There is a requirement to ensure data, regarding the environment and specifically biodiversity, is comprehensive and up to date. This will ensure that planning decisions are based on robust evidence and decisions support the objectives on NPF4 and future Local Development Plans.

NPF4 includes a specific policy on Natural places (Policy 4 Natural Places) although it is recognised that several other policies will overlap. The policy aims to 'To protect, restore and enhance natural assets making best use of nature-based solutions.' This is further qualified by the policy outcomes 'Natural places are protected and restored' and 'Natural assets are managed in a sustainable way that maintains and grows their essential benefits and services'. NPF4 sets out that 'LDPs will identify and protect locally, regionally, nationally, and internationally important 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'.

NPF4 (Policy 5 Soils) states that Local Development Plans should protect locally, regionally, nationally, and internationally valued soils, including land of lesser quality that is culturally or locally important for primary use.

National Planning Framework 4 (NPF4) specifically states' LDPs should consider using green belts, to support their spatial strategy as a settlement management tool to restrict development around towns and cities. Green belts will not be necessary for most settlements but may be zoned around settlements where there is a significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside. Greenbelts should be identified or reviewed as part of development of the Local Development Plan. There is a policy contained within NPF4, specifically in regard to Greenbelts. The current Moray Local Development Plan contains a specific policy on Countryside Around Towns (CAT's), this includes reference to spatial definition of the CATs within the LDP.

NPF4 includes a specific policy (Policy 20 Blue and Green Infrastructure) to protect and enhance blue and green infrastructure and their networks. Its outcome is to ensure blue and green infrastructure are an integral part of early design and development processes; are designed to deliver multiple functions including climate mitigation, nature restoration, biodiversity enhancement, flood prevention and water management and communities benefit from accessible, high-quality blue, green and civic spaces.

Green and blue infrastructure involves incorporating natural elements like parks, green spaces, and wildlife habitats to enhance biodiversity, mitigate climate change effects, and improve overall quality of life. In Moray, this involves policies to protect and expand existing green spaces, create new greenspace through development, and establish ecological corridors. The blue element focuses on water bodies, including rivers, lakes, and coastal areas. This might include measures to protect water quality, manage flood risks, and enhance recreational opportunities along rivers and coastal zones. Therefore, this evidence base will address several other policy areas outwith the scope of the schedule, however these will be referenced within.

Summary of Evidence

BIODIVERSITY and NATURAL PLACES

Scotland Biodiversity Strategy and delivery plan

The Scottish Government has recently published its Biodiversity Strategy to 2045 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.

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. At present, across Scotland 18.2% of land and freshwater are protected.

NatureScot is currently involved in a variety of work streams to help progress the 30 by 30 network including development of the wider nature network. It is unclear at the stage the implications for Moray however the current programme of work being undertaken by Moray Council to develop the nature network will provide a foundation for this going forward. Funding options will also be explored as part of the LDP moving forward.

NESBIP 3-year strategic plan 2022-2025

The strategic plan sets out a number of objectives including delivery through collaboration, Information exchange, Awareness and positive action. Likewise, a number of strategic priorities have been agreed by the members (the member group comprises representatives of Local Authorities, statutory bodies, environmental charities, research institutes, landowners and environmental partnerships) – a number of these will be relevant to the development of the LDP. An action plan has been developed to deliver specific actions associated with the three objectives. A number of these actions will aid in improving biodiversity through the planning system. The actions presented within this report have aided in the development of the Moray Council biodiversity study and will continue to be used in the development of the nature network programme. Furthermore, actions are contained within the plan to aid decision making of planning applications through improved information exchange. Overall, the plan will improve planning within Moray through collaboration, information exchange and raising awareness of biodiversity.

NESBIP habitat statements

The North East Biodiversity Partnership has developed six broad habitat statements which give a summary of the habitats found in the area, information on habitat status and an outline of some of the species they support. The statements also illustrate the importance of each habitat group and opportunities to secure and enhance each habitat for the future.

These habitat statements build on the previous Local Biodiversity Action Plan Habitat and Species Plans and are intended to be used to identify important habitats and opportunities for enhancement. They will be used by local authorities to provide the local context for advice on biodiversity in relation to planning, design and development and by partner organisations to guide future action and priorities for biodiversity conservation and enhancement. The Habitat Statements include a large-scale map providing an overview of the distribution of each habitat.

The habitat statements should be used as an initial step when determining planning applications. These give a general indication of habitats and associated species; however, this does not negate the need for site specific survey and analysis. Moray Council is currently developing local planning guidance to aid development management in assessing planning applications, specifically in relation to biodiversity. It is envisaged that this guidance will signpost planners to the relevant information and guidance that is already available.

Moray Council Biodiversity Duty Report 2021-23

Under the Nature Conservation (Scotland) Act 2004 all public bodies in Scotland have a duty to further the conservation of biodiversity when carrying out their responsibilities. In accordance with the Wildlife and Natural Environment (Scotland) Act 2011 public bodies must also publicly report its compliance with this biodiversity duty. This report outlines how the Moray Council has fulfilled its biodiversity duty over the period 2021 to 2023.

In relation to specific planning measures, the report highlights the current work streams that Moray Council are undertaking to protect and enhance biodiversity. All of this work is mentioned in detail throughout this and other schedules – specifically Schedules 1. Climate Change and 3. Forestry, Woodland & Trees.

Moray Council Biodiversity Study

Moray Council commissioned a detailed study to establish baseline evidence on the existing biodiversity of the area. The aim of this study is to provide data which Moray Council can utilise to develop the LDP 2027 in line with the biodiversity policies set out in NFP4. The study is split into several topics with the following objectives:
1. Priority Species and Habitats
2. Site Reviews
3. Biodiversity Enhancements Through the Planning System

The following data sources were used to inform the study:
- North East Biological Records Centre (NESBReC) for records of the following within the Moray Council Area:
  - 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
- NatureScot Open Data for protected sites:
  - 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 for Habitats and Species:
  - Habitat Map of Scotland
  - Carbon and Peatland Map Scotland 2016
  - Wildcat Priority Areas
- Scottish Forestry Open Data for Native Woodland Survey of Scotland (NWSS).
- Scottish Government Spatial data for Land Capability for Agriculture.
- Royal Society for the Protection of Birds (RSPB) Wetland Inventory.
- Scottish Wildlife Trust (SWT) Reserve Boundaries.
- Joint Nature Conservancy Council (JNCC) for internationally important Annex I habitat descriptions.
- Scottish Biodiversity List for nationally important priority species and habitats.

In summary, 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 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.

In terms of 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.

In terms of Sites of Interest to Natural Science (SINS) sites, 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. 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.

The report has amalgamated a range of information sources in regard to species locations, priority areas and hotspots across Moray. Furthermore, many of the designated sites are designated for the very reason to protect and enhance specific species.

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). This may aid in giving greater protection to species and enhance opportunities for further increase in biodiversity.

LDPs must facilitate the creation of nature networks as a requirement of NFP4 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.

Moray Council Nature network

Following on from the biodiversity study, Moray Council commissioned a further study to develop the nature network. This study is currently being conducted to identify opportunity mapping for 'strands' to connect 30x30 sites, and connect urban-rural, as per the Nature Network Framework and guidance for local authorities, as well as any emerging guidance from Scottish Government/NatureScot.

The purpose of opportunity mapping "is not to dictate where the Nature Network will be, but to outline the options available, that can then be used as the basis for discussions with local communities, landowners and managers, and experts to decide where best the Nature Network can and should go, in line with local priorities for both climate and nature."

The output of the study will show preferred routes between statutory 30 x 30 sites and urban-rural routes, including details on habitat type, priority species and any other information agreed to be relevant. Clearly the outcome of this will have a direct impact on biodiversity opportunities across Moray.

This project is due for completion July 2024.

Moray Forestry and woodland Strategy

A separate schedule will detail the forestry, woodland, and trees evidence base for Moray – Schedule 3 Forestry, Woodland & Trees.

Moray Local Development Plan 2020- Monitoring report 2023

The current Moray Local Development Plan (MLDP2020) contains several policies that relate to biodiversity, either directly or indirectly. The direct planning policies relate to placemaking, protected sites and biodiversity. However, a number of other policy areas contain elements that relate to wider

biodiversity. The MLDP has been adopted for a number of years and the relevant polices have been tested through the submission of planning applications.

The significant change since the adoption of the current LDP is the adoption of NPF4 in February 2023. This is now part of the Development Plan and there is significant focus on the climate and nature crisis. The Spatial Principles, specifically Sustainable Places highlights the importance of the environment and addressing a number of these issues. Furthermore, this strategy highlights a number of cross cutting policy themes that will require to be addressed in order to improve biodiversity.

Therefore, the adoption of NPF4 has highlighted and further emphasised the need to deliver biodiversity improvements through the planning system. The existing local development plan and the policy contained within NPF4 put further emphasis on delivering and improving biodiversity through the development plan. NPF4 has been adopted for a number of months and the policy considerations are filtering through planning decisions that are now being made. Although there are not any direct contradictions between the biodiversity policies contained within NPF 4 and the local development plan there is clearly an increased recognition and importance on the need to delivery improved biodiversity.

A number of themes have emerged from the monitoring report that are directly relevant to the development plan.

The current local development plan requires that biodiversity plans are submitted for proposals of 10 or more houses under policy DP1. The plans submitted as part of the planning application are often a mix of a landscape plan and biodiversity plan combined with some suggestions for biodiversity improvements. The majority of the time this includes tree/shrub planting, bird boxes, bat boxes and hedgehog highways. However, it is common that these plans are generic and not site specific therefore it is not always clear if these suggestions are relevant to the specific site. Moray Council is currently preparing local guidance directly related to improving biodiversity across the built environment. This should help developers in preparing site specific biodiversity plans which will meet the policy requirements set out in the development plan.

The existing planning policies within the LDP and within NPF4 provide sufficient protection for existing sites. This approach appears to be working successfully as there is minimal impact on the existing protected sites. Appropriate assessment as required through HRA regulations have been undertaken on a small number of occasions.

There has been a significant amount of planning applications that have considered protected species, however a high percentage of these are specifically in relation to bats. These have been supported by bat surveys and the proper procedure through mitigation and the licencing procedure. However, there are some occasions that species/habitat assessment is not undertaken to an appropriate standard.

There have been a small number of planning applications that have been refused due to species concerns although in all cases this was not the primary reason for refusal.

As noted, the Development Plan has raised the importance of biodiversity and acknowledged the role of the planning system in delivering this. The Development Plan has several mechanisms to ensure biodiversity is improved across all scales of development. Local planning guidance should ensure that applicants and developers are fully aware of the need to incorporate specific biodiversity improvements within their sites. The policy position on biodiversity improvements is clear, however the action and implementation of this needs to be reflected in planning decisions.

Designations

The following provides details on the designated site types currently protected within Moray:

Ramsar sites

Ramsar sites are wetlands of international importance designated under the Ramsar Convention to promote their conservation and sustainable use. Moray currently has two RAMSAR sites, Moray and Nairn Coast and Loch Spynie, totalling 2414ha.

Sites of Special Scientific Interest

Moray hosts thirty-five Sites of Special Scientific Interest (SSSIs), covering diverse and ecologically significant landscapes. SSSIs are designated to protect and conserve areas with unique flora, fauna, and geological features. Moray's SSSIs include coastal habitats, wetlands, woodlands, contributing to regional biodiversity. These designations signify the importance of preserving the natural and cultural heritage of the region. Local management and operational plans are associated with each individual site. Further details are contained within the NatureScot Sitelink.

SPA

Four Special Protection Areas (SPAs) are contained within Moray, as listed in Annex I of the Birds Directive. SPAs are crucial for the conservation of rare and vulnerable bird species and their habitats. Moray's SPAs encompass coastal areas, woodland, and other ecosystems that support avian biodiversity. These designations aim to safeguard habitats and ensure the protection of breeding, feeding, and resting sites for various bird species. Total area 4328ha.

SAC

Moray has four Special Areas of Conservation (SACs) designated under the Habitats Directive, these are Creag nan Gamhainn SAC, Culbin Bar SAC, Lower Findhorn Woods SAC and Lower River Spey - Spey Bay SAC. There is also the Moray Firth SAC. SACs are designated to protect habitats and species of European importance. In Moray, these areas include diverse ecosystems like woodlands, wetlands, and coastal regions that support unique flora and fauna. The designation aims to ensure the conservation and sustainable use of these habitats.

Local nature reserves

Findhorn Bay Local Nature Reserve is a coastal site designated to protect its diverse birds and flora. The area is also covered by other designations, as noted above—total size 1200ha.

All of the above datasets are available from NatureScot Sitelink and Moray GIS datasets.

Local nature sites

There are several wildlife sites across Moray that play an important role but are not protected by relevant legislation. However, they have some protection through the current local development plan. These will be considered as part of the wider nature network study.

Overall, there are a number of fixed reference points in terms of biodiversity and the wider environment including designated sites, protected soils, local nature reserves etc. Many of these policy areas have protection through other legislation or policies contained within the development plan. This is further supported by guidance from Scottish Government and statutory bodies. The main implication for the LDP is the need to develop improved biodiversity including the requirement for nature networks. The emphasis on enhanced biodiversity will have implications for development proposals with a requirement for improved biodiversity solutions.

Peatland, carbon-rich soils and priority peatland habitats

Naturescot has recognised that the National Planning Framework 4 states that significant weight should be given to address both the global climate and nature crises when considering all development proposals (Policy 1). Proposals must also protect, conserve, restore and enhance

biodiversity (Policy 3). In addition, the intent of Policy 5 is to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development.

The guidance and associated carbon and peatland 2016 map show the distribution of carbon and peatland classes across the whole of Scotland. It gives a value to indicate the likely presence of carbon-rich soils, deep peat, and priority peatland habitat for each individually mapped area, at a large scale. The dataset contains carbon and peatland class values, as well as over 439,000 records providing detail on the main soil types and habitat characteristics associated with each area mapped.

The map is a high-level planning tool created to promote consistency and clarity in the preparation of spatial frameworks by planning authorities. The map is a predictive tool which provides an indication of the likely presence of peat on each individually mapped area, at a large scale. The types of peat shown on the map are carbon-rich soils, deep peat and priority peatland habitat. While this tool is helpful to establish the likely presence of peat on a site, any development proposals must satisfy the policy requirements through site specific investigations.

Prime Agricultural Land

Land capability for agriculture provides information on the types of crops that may be grown in different areas dependent on environmental and soil characteristics. Soil classes range from Class 1 (land capable of producing a wide range of crops) to Class 7 (land of very little agricultural value). Land within Class 3 is subdivided to provide further information on potential yields; Classes 4 and 5 are further divided to provide information on grasslands; Class 6 is divided on the quality of the natural vegetation for grazing.

This information has an implication for the spatial strategy and policy content on sensitive soil sites, namely sites that contain Prime Agricultural Land (PAL). Information and the approach to identifying locally and culturally important soils will be considered as part of the development of the forthcoming LDP.

LANDSCAPE

Moray Local Landscape Designation Review 2018 and Local Development Plan 2020 Monitoring Report 2023

In 2018, Moray Council conducted a blank canvas review of all landscapes across Moray including existing landscape designations. The review identified 13 Special Landscape Areas (SLAs), which was reflected in the MLDP 2020, aimed at protecting and enhancing the special character and qualities of Moray's most valued landscapes as well as promoting a greater understanding of them.

MLDP2020 Policy EP3 supported these designations with a tailored approach to ensure that development did not prejudice the special qualities of the designated landscapes. The policy also specified acceptable uses based on urban and rural areas within the designated landscape. The Monitoring Report 2023 demonstrates that the policy is having a positive effect on development in the valued landscapes. A total of 19 applications (8 in 2021/22 and 11 in 2022/23) were refused on the grounds that development would have an adverse impact on the landscape/special qualities or did not reflect the traditional settlement character. In rural areas, there is a requirement for proposals to be of specified uses. In 2021/22, no applications were refused due to the proposed use, although 2 developments (nursery and quarry extension) were deemed to be acceptable departures from MLDP Policy EP3 as they would not impact on the special qualities. In 2022/23, 3 applications were refused due to non-confirming uses that would impact on the special qualities of the area. Two applications were approved as an acceptable departure on the basis that the uses were for the enhancement of digital infrastructure or would supersede an extant consent resulting in a lower impact.

There will be a requirement for a tailored landscape approach in Moray due to unique circumstances regarding rural development and energy development, it is likely this will take the form of a local policy within the LDP.

Keith Green Energy and Infrastructure Framework

The Keith and Blackhillock areas are coming under increasing development pressure, on a piecemeal basis, from development that supports the National Grid and there is no forward planning to identify necessary infrastructure or development potential, which undermines the plan-led system advocated by the Government.

With national developments promoted in National Planning Framework 4 (NPF4), including Strategic Renewable Electricity Generation and Transmission Infrastructure, a development framework has been developed for the Keith and Blackhillock areas in order to make best use of surrounding land and appropriately control the opportunities arising from renewables associated with the grid infrastructure and energy systems/storage. Based on a landscape sensitivity assessment, the Framework identifies potential development sites for a range of uses and associated landscape mitigation required.

Moray Wind Energy Landscape Sensitivity Study 2023

Moray Council has experienced significant pressure for onshore wind farms over the last 20 plus years. Two areas of significant cumulative impact have been created at Dallas/ Knockando Moor and Cabrach which have resulted in significant adverse landscape impacts. Moray Council has objected to a number of large-scale wind farms, however despite having up to date local policy guidance and landscape capacity studies/ landscape sensitivity studies, proposals have continued to be consented, despite being contrary to local development plan policy.

The Moray Wind Energy Landscape Sensitivity Study (LSS) 2023 accords with the NatureScot methodology set out in their Landscape Sensitivity Assessment Guidance 2022. The LSS considers broad landscape and visual sensitivities, identifying constraints and opportunities at a strategic scale. The sensitivity assessments have been undertaken on the basis of Assessment Units (page 18/Figure 3) which are closely allied to Landscape Character types. The study considers the sensitivity of Assessment Units to a limited number of pre- determined turbine types, principally based on height, individual applications need to be considered on a case-by-case basis with some flexibility on turbine heights being applied within close range of the upper height threshold used in the sensitivity assessment. The LSS and implications for the Proposed Plan are analysed in more detail in Schedule 5- Energy.

Countryside Around Towns

Countryside Around Towns's (CAT's) are designated in MLDP 2020 where there is highest development pressure and aim to prevent development sprawl into the countryside. A review by Moray Council is currently ongoing to review all the Countryside Around Town designations within the local authority area. This will asses the current Countryside Around Towns (CAT's) designations for five settlements within Moray, namely Elgin, Forres, Keith, Buckie, and Lossiemouth. This will include assessing the purpose of the individual CAT designations and ensuring they are fit for purpose and provide a robust decision-making framework. The need for any additional CAT's will also be considered.

The outcome of the review will suggest any required changes to the CAT boundaries, including removal of existing ones and recommendations for any new CAT designations. The review will consider any policy updates, development pressures, changing land use priorities, environmental priorities and include an evaluation of the effectiveness of the current CAT.

The main outcome of the review is to provide an up-to-date assessment of the current CAT designation and ensures that it continues to deliver a balance between development needs and the protection of the area around pressurised settlements.

Following the publication of NPF4 and the need for clarity between NPF4 Policy 8 Greenbelts and Moray LDP Policy EP4 Countryside Around Town a policy position was agreed by Moray Council (Moray Council Planning and Regulatory Services Committee 19 December 2024).

The committee agreed (19.12.2024) with the policy position regarding the difference between the Countryside Around Towns and Greenbelt designations and that the LDP policy EP4 CAT will prevail in determining planning applications. Therefore, going forward and in reference to the forthcoming LDP, it is expected that the local policy on CAT's will continue.

GREEN AND BLUE INFRASTRUCTURE

Open Space Strategy

The Moray Open Space Strategy (OSS) 2018 is a plan developed by Moray Council to guide the protection, management, and enhancement of open spaces within Moray. Open spaces encompass a variety of areas, including parks, recreational areas, and natural landscapes. This strategy is designed to balance the protection of natural environments with the need for recreation, community engagement, and sustainable development.

The current OSS sets out eight objections and associated actions to deliver the overall vision.

The objectives are:
1. To ensure public open spaces provide a diversity of functions, including ecological, cultural, visual, and sport and recreation.
2. To ensure public open spaces in Moray are of sufficient quality and distribution to meet the needs of local communities and local biodiversity.
3. To address the importance of accessibility and walkability to public open space.
4. To promote safe use and enjoyment of open space through appropriate siting and design.
5. To establish a framework and standards to allow consistent decision making for the ongoing development and management of public open space.
6. To encourage community involvement in improving and managing open space.
7. To protect public open space and proposed open spaces from inappropriate development.
8. Avoid fragmentation of existing open spaces and encourage creation of green network.

The strategy sets out open space standards and guidelines to ensure there are qualitative and quantitative factors to assess. The strategy then provides a summary of the open space audit, with open spaces categorised across a range of environments, including scores for quality, quantity, and accessibility. The associated appendices provide information on individual settlements.

Overall, the Moray Open Space Strategy, with its holistic approach, aims to strike a balance between development and the conservation of natural environments. It plays a crucial role in promoting the well-being of residents, promoting community cohesion, and contributing to the overall quality of life in the region.

An updated Moray Open Space Strategy is currently being prepared with audit field work completed and the Strategy will inform the forthcoming Local Development Plan. This will highlight any gaps in provision and how this can be addressed through other work streams, including the play sufficiency assessment, nature networks and any links with development through developer obligations.

This will allow NPF4 to be considered and provide updates on specific settlements and sites.
It is envisaged that it will follow a similar approach to the current open space strategy.

The open space strategy will feed into the local living methodology through appropriate and sufficient provision of open space and associated play spaces.

Core Paths Plan

The Core Path Plan outlines a network of paths and routes that connect communities, natural landmarks, and recreational areas. This plan aims to enhance accessibility, promote outdoor activities, and contribute to the well-being of residents. Furthermore, the Core Path Plan provides opportunities for additional green infrastructure and wider linkages.

An amended core path plan has recently been reviewed by Moray Council and updates information originally contained within the LDP 2011.

The Moray Core Path Plan should allow for the further develop of green infrastructure by incorporating natural corridors and green spaces into the network of paths and routes. This integrated approach not only facilitates movement but also promotes the conservation of biodiversity, cultural heritage, and scenic landscapes. By fostering a balance between development and nature, the core paths provide an opportunity to further develop green networks. Furthermore, the protections afforded to the core path network ensure that this infrastructure is safeguarded from inappropriate development.

The core path plan is currently being considered as part of the Moray Nature Networks study. The Moray Core Path Plan is a wide-ranging document that will have spatial implications across policies within the LDP. The core path plan contains a number of routes that will help to deliver policy outcomes contained within the local development plan. It is acknowledged that there will be gaps in this provision and that delivery mechanisms will be explored to fill these gaps. This may require coordinated working with community groups and other organisations. This will be reflected in the LDP delivery programme.

Food Growing Strategy

The Moray Food Growing Strategy is a plan designed to promote sustainable food production within the Moray region. This strategy recognises the importance of promoting a sustainable and diverse food supply while addressing environmental, economic, and social considerations of locally produced food. The strategy is supplementary guidance supporting the Moray Local Development Plan 2020 and a material consideration in the determination of planning applications for growing spaces.

At its core, the strategy aims to encourage and provide opportunities for communities to grow their own food. There is a spatial strategy contained within to show existing and potential food growing opportunities within specific settlements within Moray.

The protection afforded to food growing areas and the opportunities presented within the strategy add to the green network and demonstrates a different element of green infrastructure.

By embracing a rounded approach to food production, the Moray Food Growing Strategy contributes and provides opportunities to building a resilient and sustainable local food system, enhancing the well-being of both the community and the environment.

The strategy clearly shows the benefits of providing food growing space within settlements. There is a clear need to embed food growing opportunities within developments and ensure these are accessible and inclusive spaces. Therefore, there will be a requirement to provide food growing spaces in larger developments as part of open space requirement. There may need to be a tailored approach within Moray or a local policy to ensure these spaces come forward in an appropriate manner.

Play sufficiency Audit

The Moray Play Sufficiency Assessment is an assessment conducted to evaluate the adequacy and effectiveness of play opportunities and environments for children and young people within the Moray region. The term "play sufficiency" refers to the idea that children have a right to sufficient and varied opportunities for play as an essential component of their development and well-being.

The audit involves an assessment of existing play spaces and facilities, to determine whether they meet the needs of children and young people and promotes an accessible, play-friendly environment. This process includes gathering input from children themselves, parents, and community members to understand their perspectives on play and identify any gaps or deficiencies in the current provision.

The key components of the Play Sufficiency Audit include:
1. Assessment of Play Spaces: Evaluate the quality and accessibility of existing play areas, parks, and recreational facilities.
2. Community Engagement: Seek input from children, parents, and the community to understand their preferences, concerns, and suggestions regarding play opportunities.
3. Collaboration with Stakeholders: Work within local authorities, schools, and community groups to ensure a coordinated and collaborative approach to enhancing play opportunities.
4. Identification of Barriers: Identify any barriers or challenges that may hinder children's access to safe and enjoyable play experiences.

The Moray Play Sufficiency Audit aims to provide an understanding of the current status of play facilities with Moray. The findings will inform future planning and policy decisions to create a more play-friendly community. This evidence contained within the audit will feed into the Local Living methodology -Schedule 7 Local Living.

Flooding and Water Management

A separate schedule will contain information on flooding and wider blue infrastructure issues – Schedule 11. It is also acknowledged that blue infrastructure is a key element of placemaking and that this will be considered as part of the place making schedule – Schedule 6 Placemaking.

Moray Council Supplementary Guidance - Flood Risk and Drainage Impact Assessment for New Developments is currently being updated.

Summary of Stakeholder Engagement

Over the past year stakeholder engagement has been ongoing specifically in relation to gathering information on biodiversity and natural spaces. This approach was adopted to reach out to a number of stakeholders and local interest groups to ensure a robust evidence base was established for development of the evidence report.

Prior to the development of the biodiversity study several online workshops were hosted to understand the requirements of what information was needed. The following stakeholders were involved; Naturescot, Forestry and Land Scotland, Scottish Forestry, Woodland Trust and RSPB. Furthermore, engagement has taken place with neighbouring Planning Authorities and internal within the wider planning team.

During the development of the biodiversity study a number of other stakeholders and local interest groups were engaged and supplied information to inform this study. Details are included with the biodiversity study.

Work is continuing on the development of the Moray Nature Network which continues to engage a number of stakeholders. A core group is currently being set up to support the development of the Nature Network and will allow continued engagement and involvement.

The information received through this engagement exercise, and the continuation of this has enabled a wide range of views to be incorporated into the ongoing process of gathering evidence.

A number of other, more general engagement exercises have taken place other the past year, for example public events and school workshops. Any information submitted, related to biodiversity will be analysed as part of the process.

This core group will continue to be involved in the further development of the nature network process.

As detailed above, engagement has been conducted on the Play Sufficient Assessment, throughout the process.

Many of the strategies named above, have engaged stakeholders as part of the development of the strategy.

Summary of Implications for the Proposed Plan

Biodiversity and Natural Places
- The emphasis on biodiversity enhancement will impact on development proposals; this should be included in site selection criteria.
- Improved biodiversity plans need to be site specific. Local planning guidance is currently being developed to aid developers in producing biodiversity plans that are appropriate for their sites.
- Biodiversity plans need to be deliverable and monitored – a policy mechanism will be required to ensure this happens in perpetuity. Long term management plans should be included within development proposals.
- Development of a Nature network, including the requirement for 30 x 30 for biodiversity improvement will impact on land use designations.
- In some cases, the need to offset biodiversity enhancement may require designation and a policy mechanism to deliver this.
- Biodiversity improvements will also be delivered through other policy and strategy mechanisms i.e. Forestry and Woodland Strategy, Open Space Strategy etc.
- Development of the Nature network, including the protection and enhancement of green infrastructure will impact on land use, existing policy & legislation.
- Designated sites i.e. RAMSAR, SSSIs etc. will continue to direct development to the most appropriate places. The review of existing SINS may have implications for land use and policy requirements.
- The increased emphasis on protection of soils will impact on development proposals and should be considered as part of the site selection process.

Landscape
- Any changes to the Countryside Around Towns designations will require an update to the spatial strategy and policy – with the need for a local policy to reflect the local circumstances.
- The Keith Green Energy and Infrastructure Framework should be reflected in the Regional Spatial Strategy and Proposed Plan.
- The outcomes of the Moray Local Landscape Designation Review (currently referred to as Special Landscape Areas) should be reflected in the Proposed Plan as local landscape designations.
- Prepare a tailored approach to support local landscape designations by taking account of existing evidence, local knowledge/experience, and specific characteristics of Moray.

- Approach must recognise Moray's primary indigenous industries and their needs, including developing a definition of Moray's indigenous industries.

Green and Blue Infrastructure
- The updated OSS will create new spatial opportunities and add to the nature network.
- The Food Growing Strategy has highlighted a number of potential food growing sites, these should be incorporated into the next LDP and/or place plan.
- The play sufficiency audit will provide information on existing play facilities and informal play spaces – this may have an impact on the spatial strategy and policy/site requirements of the next LDP.
- All of the above will impact on site selection criteria.

Statements of Agreement

NatureScot

NatureScot has agreed with the sufficiency of the evidence but has suggested some additional evidence sources to complement the existing schedule. It is suggested the 24 additional datasets, and two additional evidence sources are included. Furthermore, additional protected areas should be included, specifically cross-border sites and marine protected areas. It is suggested a list of challenges is included to match the forestry woodland and trees schedule. Finally, it is suggested that further evidence should be included on earth sciences/Geodiversity.

Moray Council Response - To ensure a proportionate approach within the Evidence Report Moray Council examined the suggested additional evidence datasets and sources. The following evidence sources will be added to the evidence report - any suggested evidence sources that are not proportionate or are covered by other evidence sources have not been included.

The following data sets will be added to the Evidence Report
- Priority Marine Features - https://opendata.nature.scot/maps/0e722e3e911e424f8dacac5a587c0dfb/about
- Habitat Map of Scotland: https://opendata.nature.scot/datasets/snh::habitat-map-of-scotland/explore
- Scotland Land Cover Map 2022 - EUNIS Level 1: https://opendata.nature.scot/maps/scotland-land-cover-map-2022-eunis-level-1/explore?location=57.570685%2C-4.968950%2C6.92
- Scotland Land Cover Map 2022 - EUNIS Level 2: https://opendata.nature.scot/maps/scotland-land-cover-map-2022-eunis-level-2/explore?location=57.570685%2C-4.968950%2C6.92
- Scotland Land Cover Map – Change 2020-2022: https://opendata.nature.scot/maps/scotland-land-cover-map-change-2020-2022/explore?location=57.570685%2C-4.968950%2C6.92
- National Vegetation Classification (NVC): https://opendata.nature.scot/datasets/snh::nvc-habitat-polygons/explore?location=57.758912%2C-4.979327%2C6.94
- GCRs: https://opendata.nature.scot/datasets/geological-conservation-review-sites/explore?location=52.187489%2C-6.472151%2C4.00
- Peatland https://opendata.nature.scot/search?groupIds=dc87e2f315c0452f8b2f2fbbfa0eabd4 https://opendata.nature.scot/search?groupIds=dc87e2f315c0452f8b2f2fbbfa0eabd4 including Peatland Action Depth and Condition: https://opendata.nature.scot/datasets/snh::peatland-action-peat-depth-andcondition/ explore?location=57.684253%2C-4.102587%2C7.00

- SSW – Soil Map: https://soils.environment.gov.scot/maps/soil-maps/national-soil-map-ofscotland/
- SEWeb – BGS Bedrock: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/
- SEWeb – Superficial Layer: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/
- National-Scale Land Capability for Agriculture: https://soils.environment.gov.scot/maps/capability-maps/national-scale-land-capability-foragriculture/
- Framework for Nature Networks in Scotland – Draft (https://www.nature.scot/doc/framework-nature-networks-scotland-draft) plus outcomes from Nature Networks pilot.
- Scottish Government's 'Green Infrastructure: Design and Placemaking' (2011): https://www.gov.scot/binaries/content/documents/govscot/publications/advice-andguidance/2011/11/green-infrastructure-design-placemaking/documents/0122541-pdf/0122541-pdf/govscot:document/0122541.pdf

The following data sets were not considered proportionate and have not been included in the Evidence Report.

- UK Lakes Portal - https://eip.ceh.ac.uk/apps/lakes
- Dynamic Coast - https://www.dynamiccoast.com/
- Saltmarsh Survey of Scotland: https://opendata.nature.scot/datasets/snh::saltmarsh-surveyof-scotland/explore
- Wildcat Priority Areas: https://opendata.nature.scot/datasets/snh::wildcat-priorityareas/explore?location=54.297367%2C-6.472151%2C5.00
- HES – Canmore (cultural soils):https://canmore.org.uk/site/search/result?SITETYPE=500476&SITEDISCIPLINE=1&SITECOUNTRY=1&COUNCIL
- Soil sealing: https://www.nature.scot/doc/scotlands-indicators-soilsealing#:~:text=Description%20of%20current%20indicator%20status,unitary%20authority%20(%3C0.10%25)
- Map of subsoil compaction risk: https://soils.environment.gov.scot/maps/risk-maps/map-ofsubsoil- compaction-risk-partial-cover/
- Map of soil erosion risk: https://soils.environment.gov.scot/maps/risk-maps/map-of-soilerosion-risk-partial-cover/
- Map of soil leaching potential: https://soils.environment.gov.scot/maps/risk-maps/map-ofsoil-leaching-potential-partial-cover/
- Map of runoff risk: https://soils.environment.gov.scot/maps/risk-maps/map-of-runoff-riskpartial-
- Nitrate Vulnerable Zone: https://www.spatialdata.gov.scot/geonetwork/srv/eng/catalog.search#/metadata/0bcbd0ce-05e7-4ea3-9cd9-3699cb7a5894

To address the issue of the protected areas a map will be included within the evidence report to show all the protected areas within Moray, including cross boundary areas and marine protected areas.

The schedule will be updated to highlight specific challenges related to the topics contained within this report.

As noted, some additional datasets will be included that directly address earth sciences/Geodiversity issues.

SEPA

SEPA has agreed with the sufficiency of the evidence but has suggested some additional evidence sources to complement the existing schedule. It has been specifically suggested that further evidence is included to support Policy 20 of NPF4 – Blue and Green Infrastructure. It is noted that a list of evidence sources has been included within *SEPA- Evidence sources by MOF4 policy topics Version 2 November 2023.*

Moray Council Response- Moray Council accepts the suggestions put forward by SEPA in regard to Policy 20 NPF4, specifically in relation to blue infrastructure. However, it is acknowledged within the schedule that many of the policies mentioned are cross cutting and to avoid repetition and ensure proportionality not all the suggested evidence sources will be added to this schedule. For example, a number of these evidence sources relate specifically to flooding and it would be more appropriate to include these within other schedules. As noted in this schedule blue and green infrastructure can provide multiple benefits including many of the topics covered in this schedule. Many of the evidence sources already highlighted will contain information to support policy 20 blue and green infrastructure, for example the Open Space Strategy, Nature Networks Study, and the Biodiversity Strategy etc.

Following consideration of the SEPA document and to be proportional and avoid repetition with other schedules there is no additional evidence sources contained within the afore mentioned document that should be brought forward into this schedule.

Statements of Dispute
None identified.

Issue: Topic / Place	3. Forestry, woodland and trees
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15(5)- the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district.

Links to Evidence	**CD043** Moray Woodland and Forestry Strategy 2018
	CD026 Draft Moray Forestry and Woodland Strategy 2024
	CD044 Scotland's Forestry Strategy 2019-2029
	CD045 Moray Planning Policy Guidance - MLDP
	CD046 Register of Tree Preservation Orders (TPOs)
	CD047 'Review of Tree Preservation Orders' – Report to Planning and Regulatory Services Committee on 20 December 2022
	CD028 Moray Local Development Plan 2020 Monitoring Report 2023
	
	Datasets
	• GIS datasets for woodland cover, preferred, potential planting areas- data held by Moray Council relating to Moray Woodland and Forestry Strategy 2018
	• National Forest Inventory 2020 dataset produced by Forest Research with regular updates https://data-forestry.opendata.arcgis.com/search?tags=Scotland
	• Native Woodland Survey of Scotland- produced by Forest Research, 2015- https://www.arcgis.com/home/item.html?id=6d27b064fcba471da50c8772ad0162d7
	• Scottish Ancient Woodland Inventory- data managed by Naturescot https://www.data.gov.uk/dataset/c2f57ed9-5601-4864-af5f-a6e73e977f54/ancient-woodland-inventory-scotland
	• Scottish Forestry Open Data (arcgis.com):
	   ○ *Plans and Felling;*
	   ○ *Forestry Grant Scheme Options and Claims*
	• Riparian woodland https://opendata.nature.scot/maps/ae0e62851e614ad39f52d38440b9a9a8/about
	-

National Planning Framework 4 (NPF4) Context

NPF4 requires Local Development Plans to 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 Forestry and Woodland Strategy.

Summary of Evidence

Scotland's Forestry Strategy 2019-2019

The vision in the Strategy document is;

"In 2070, Scotland will have more forests and woodlands, sustainably managed and better integrated with other land uses. These will provide a more resilient, adaptable resource, with greater natural capital value, that supports a strong economy, a thriving environment, and healthy and flourishing communities."

The Strategy aims to increase forest and woodland cover to 21% of the total area of Scotland by 2032 and to increase the use of Scottish wood products in construction from 2.2 million m3 in 2018 to 3 million m3 by 2031/32.

While the Local Development Plan and Regional Spatial Strategy must reflect this land cover and opportunities to support the national targets for woodland expansion, this has to be balanced with other land uses and amenity considerations.

Moray Woodland and Forestry Strategy 2018

The Strategy was published by Moray Council in January 2018, recognising the importance of Moray's forests for economic, social and environmental benefits. Moray has approximately 34% of its land covered in forests and woodlands, compared with the national average of 19% in Scotland and the strategy identifies the key issues affecting forestry and woodlands in Moray and seeks to promote the opportunities that exist across the sector to support and enable them to develop. It also seeks to guide woodland creation to appropriate locations across Moray over the next 20 years and is used by Scottish Forestry to assist in assessing applications for forestry grants.

Draft Moray Woodland and Forestry Strategy 2024

To inform the new Local Development and the Regional Spatial Strategy, the Council, Highlands and Islands Enterprise and Scottish Forestry jointly commissioned a new Woodland and Forestry Strategy, and a draft will be consulted on in Spring/ Summer 2024. The draft Strategy recognises that woodlands and forests in Moray form part of a mature and well-developed economic forestry sector with a range of related businesses spanning from tree nurseries, harvesting, transportation and sawmilling. Forestry forms a key part of Moray's economy generating £39 million annually and providing direct employment for almost 1000 people based on data from BRES.

The purpose of the draft Strategy (p3) is to help deliver Scotland's transition to a net zero future and the Scottish Government commitments on:
- Sustainable development and economic growth
- Mitigating the global climate emergency
- Reversing biodiversity loss
- Increasing community health and well-being

The Strategy, when approved, will principally be use by landowners and managers, Scottish Forestry, Moray Council, and stakeholders when considering woodland creation schemes, felling applications and Long- Term Forest Plans. The Strategy has taken account of the Woodland Forestry Strategies in place in adjacent local authorities which are not individually references in this schedule.

Woodlands in Moray comprise a diverse mix of productive and native woodlands which make a strong contribution to biodiversity and to the distinctiveness of the landscape.

Table 1 Broad species composition

Woodland Type	Area	%
Predominantly conifer	51,649	81
Predominantly broadleaved	10,628	17
Mixed conifer and broadleaved	1,327	2
Total hectares	63,604	100

Forestry and Land Scotland own 37% (23,418ha) of woodlands and forests in Moray with the remainder in private/ community ownership.

The Strategy estimates that 990 people are employed in forestry related business activities in 95 businesses. 80 are micro sized businesses with up to 9 staff, 10 are small businesses with up to 49 staff and 5 are medium sized businesses with up to 250 staff. Moray is home to nationally important tree nurseries, including Christies (Fochabers) which forecast sales for the year ended August 2023 are estimated to be more than 25 million trees rising to 30 million trees per annum over the next 3 years. Newton nursery is run by Forestry and Land Scotland and provides 7 million of the 24 million trees required annually by FLS for woodland expansion and restocking.

The majority of Moray's woodland and forests accommodate tracks and paths for cycling, walking, horse riding and are used to host regional, national and international events such as orienteering. Long distance trails run through the woodlands and forests including the Dava Way, Moray Coast Trail and Speyside Way. The Moray Way is a popular route which combines these three trails and provides links into Highland, Aberdeenshire, and the Cairngorms National Park.

Moray's woodland and forests provide a wealth of environmental benefits, hosting numerous protected animal species such as red squirrel, black grouse, pine marten, bats, wildcat, goshawk, and the Scottish wood ant. Invasive non-native species such as rhododendron, Himalayan balsam and Japanese knotweed are also present in some of Moray's woodlands and riparian corridors, which can outcompete more diverse flora and result in reduced biodiversity.

Planted productive forests dominate the woodland cover in Moray, comprising extensive areas of Scots Pine with many managed under continuous cover systems which increase age diversity of the trees and allow ground flora to develop. Semi natural woodland is scattered throughout the region, found in small patches, most often associated with riparian corridors and fragmented stands I agricultural landscapes and upland areas. Priority woodland habitats in the area include Upland Birch, Upland Oak, Upland Mixed Ash, Lowland Mixed deciduous and Wet Woodlands. Increasing the cover of semi natural woodlands is challenged by high levels of deer and livestock browsing, reducing the success of natural regeneration.

Many of the woodlands are present in the Ancient Woodland Inventory, which are areas which have been under continuous forestry cover since 1750. These have a rich and diverse soil biota and other associated flora and fauna. Many of Moray's woodlands are considered to be of national and international importance for their biodiversity value with the following designations in place.

Ramsar sites:
- Loch Spynie
- Moray and Nairn Coast

Sites of Special Scientific Interest:
- Bochel Woodland
- Buinach and Glenlatterach
- Burn of Ballintomb
- Cairngorms
- Creag nan Gamhainn
- Culbin Sands, Forest and Findhorn Bay
- Den of Pitlurg
- Eastern Cairngorms
- Kellas Oakwood
- Loch Spynie
- Lower Findhorn Woods
- Lower River Spey
- Lower Strathavon Woodlands

- Mill Wood
- Quarry Wood
- Spey Bay

Special Areas of Conservation:
- Cairngorms
- Lower Findhorn Woods
- Lower River Spey- Spey Bay

Special Protection Area:
- Cairngorms
- Darnaway and Lethen Forest

As well as their biodiversity value, Moray's woodland, and forests play an important role in carbon storage, accumulating approximately 869,000 tonnes of carbon per annum with around 95% of this attributed to conifers and 5% to broadleaved trees.

Challenges to Moray's woodland and forestry resources include.
- Extreme weather events such as the devastation caused by storm Arwen
- Wildfires, either through natural causes or acts of wilful fire-raising.
- Tree disease
- Renewable energy generation targets resulting in loss of productive forests.
- Herbivore impact, particularly deer (both roe and red)
- Invasive non-native species (INNS)- rhododendron, Himalayan balsam, Japanese knotweed but also other non- native tree species such as beech in native woodland.

Woodland creation targets are set out in the Scottish Government's Climate Change Plan. Scotland created 8190ha of new woodland in 2022/23 from a target of 15,000ha. Scottish Forestry approved 11,000 ha of new woodland in 2022 but not all of this has bene planted. New woodland planting targets will increase to 16,500 in 2023/24 and up to 18,000ha in 24/25.

Support infrastructure for visitors to Moray's woodlands and forests are limited, mainly focussed on Culbin and Roseisle with mountain bike trails invested in at Fochabers. There is an opportunity to take a more strategic approach to Moray's tourism branding and marketing of the woodland and forest resource and to consider a "Climate Forest" approach, linking into the studies on nature networks, carbon offsetting and exploring funding opportunities through the Just Transition Fund.

The draft Strategy provides spatial guidance which can be reflected in the local development plan and Regional Spatial Strategy of different categories for land according to their potential sensitivity for woodland planting as shown in Table 2 below.

Table 2

Land category	Area	%
Existing woodland	63,604	34
Sensitive	21,930	12
Likely to be Unsuitable	11,754	6
Preferred	68,383	36
Potential	4,736	3
Potential with sensitivities	17,059	9
Total hectares	187,466	100

The draft Strategy identifies 6 broad landscape areas across Moray and provides mor specific locational guidance on woodland creation and other related opportunities (p31) which will be reflected in the local development plan.

The role of urban trees is also recognised in the draft strategy, in terms of protection of existing trees and also new planting opportunities. Both individual street trees and urban woodland areas provide health and wellbeing benefits to people, contribute to nature networks and are important measures for climate mitigation and adaptation. There are therefore multiple benefits to be realised through taking an integrated approach to these issues through tree planting, protection, and improved public access.

Register of Tree Preservation Orders

Moray Council maintain an up-to-date register of TPO's. A programme to review existing TPOs was undertaken in autumn 2022 to ensure that all TPOs retained their amenity value and remained appropriate and relevant. Officers undertook site visits and assessed the tree(s)/woodland against MLD Policy EP7 and the reasons for which the TPO was originally served for.

The outcome of the review was considered by the Planning & Regulatory Services Committee at its meeting on 20 December 2022 where it was agreed to revoke 9 TPOs, vary one TPO and serve one TPO. All were confirmed without modification following the required public consultation.

Moray Council currently have 32 TPOs across the region.

Moray Planning Policy Guidance – MLDP2020

To aide delivery or interpretation of MLDP policies in the local context, planning policy guidance was developed to guide developers and officers. Guidance on MLDP Policy EP7 included clarification on the interpretation of 'technically unfeasible' in relation to ability to retain healthy trees and the requirements for compensatory planting.

MLDP Monitoring Report 2023 – Trees and Woodland

The level of tree and woodland removal associated with developments has largely been consistent since the adoption of MLDP 2020. However, since the introduction of NPF4 - which makes no reference to individual trees other than those that are veteran and infers that compensatory planting is not required for losses below 0.1ha – there has been an increase in tree/woodland removal that does not comply with or is deemed an acceptable departure to MLDP Policy EP7. In addition, significantly less compensatory planting has been secured between 2022 and 2023 compared to that which was lost.

In the absence of a local policy which seeks to protect or compensate healthy trees, there is a risk of a return to substantial tree felling (under 0.1ha) to accommodate development, without the provision of compensatory planting.

GIS datasets

The Council holds datasets relating to the Forestry and Woodland Strategy as well as for Ancient Woodlands and carbon and Peatland. These datasets are used in the local development plan process and development management process to ensure there is no adverse impact upon these resources. Taken together the above evidence identifies the importance of woodland and forestry cover in Moray and the resultant wide-ranging benefits these bring.

The datasets provide an invaluable source for the new local development plan to ensure that woodland and forestry resources are safeguarded with particular focus on ancient woodland and other protected trees. The datasets, along with studies referenced in the Biodiversity schedule also highlight opportunities to establish nature networks and connectivity between woodlands.

Stakeholder engagement

Scottish Forestry and Highlands and Islands Enterprise were key partners in the preparation of both the 2018 and 2024 Woodland and Forestry Strategies.

NatureScot and Moray Speyside Tourism were key partners in the preparation of the 2018 Woodland and Forestry Strategy and will be a key consultee on the 2024 draft Strategy.
Copies of the schedules were sent to the following organisations:
- Highlands and Islands Enterprise
- Nature Scot – see comments below
- Scottish Forestry – see comments below

Summary of Implications for the Proposed Plan

- The new Forestry and Woodland Strategy should be reflected in the Regional Spatial Strategy and new Local Development Plan.
- Future policy approaches should reflect the importance of the Forestry industry to the Moray economy.
- The new Local Development Plan should identify place-based opportunities for woodland expansion and incorporate findings from other evidence including nature networks and natural capital to ensure a multi benefit approach.
- The new Local Development Plan should include early engagement with a wide range of stakeholders on the potential for a Moray Climate Forest or similar approach.
- The new Local Development Plan should maximise recreational opportunities to connect people with places.
- Woodlands and trees subject to TPO's to be safeguarded from development and opportunities for new tree and woodland planting to be maximised, where appropriate.
- Local policies should promote use of local wood resources in construction through a Community Wealth Building approach.

Statements of Agreement

Comments received from Scottish Forestry proposing additional datasets which have been added.

Comments received from Nature Scot proposing an extensive list of datasets relating to nature conservation designations and biodiversity which are not considered to be proportionate within this schedule. However, an additional dataset on riparian woodland has been added. NatureScot also requested additional designated sites be added which have a noted woodland interest, which have been included above.

Statements of Dispute

None identified.

Issue: Topic / Place	4. Historic assets and places
Information required by the Act regarding the issue addressed in this section	- Town & Country Planning (Scotland) Act 1997 Section 15(5) - The principal-built heritage characteristics of the district. - Planning (Listed Buildings & Conservation Areas) (Scotland) Act 1997 - Ancient Monuments and Archaeological Areas Act 1979
Links to Evidence	**CD048** Cullen Seatown Conservation Area Character Appraisal - 2017 **CD049** Findhorn Conservation Area Character Appraisal - 2017 **CD050** Keith Mid Street Conservation Area Character Appraisal & Action Plan – 2010 **CD051** Archiestown Conservation Area Review (Draft) – 2023 **CD052** Cullen Conservation Area Review (Draft) - 2023 **CD053** Findochty Conservation Area Review (Draft) - 2023 **CD054** Portknockie Conservation Area Review (Draft) - 2023 **CD045** Moray Planning Policy Guidance - MLDP EP10 Listed Buildings **CD055** Our Past, Our Future: The Strategy for Scotland's Historic Environment **CD056** Conservation Area Designation Review 2023 - Committee Report – Appendix 3 **CD057** Moray Replacement Windows and Doors Guidance 2022 **CD058** Moray Planning Policy Guidance - NPF4 Policy 2 **CD059** HES Buildings at Risk Data Spreadsheet Data Sets - List and interactive map of Moray's conservation areas http://www.moray.gov.uk/moray_standard/page_86282.html - Historic Environment Scotland (HES) heritage designation data and interactive map. Maps and data sets shows all listed buildings, conservation areas, Gardens and Designed Landscapes, and Battlefields. https://hesportal.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d - Moray Historic Environment Record https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Moray - Buildings at Risk Register https://www.buildingsatrisk.org.uk/search/planning_authority/198

National Planning Framework 4 Context

Policy 7 Historic assets and places requires LDP's to support the sustainable management of the historic environment. They should identify, protect, and enhance valued historic assets. Moray's historic environment helps to define Moray's identity and sense of place. It not only contributes to its sense of place but also bring huge benefits through its tourism, leisure, and educational value and it is important that this is preserved and enhanced for future generations to enjoy. It can also act as a catalyst for town centre regeneration through heritage-based schemes. It is important that all aspects of the built heritage are protected, such as unlisted building within conservation areas, which can make a valuable contribution to Moray's built heritage.

Summary of Evidence

Heritage Designations and assets

The Moray Council maintains up to date datasets and records of all heritage assets within Moray. This data can be found on the interactive mapping tool on the HES website as well as the Council's own Historic Environment Record (HER) and GIS systems. The Council has this data refreshed every 3 months ensuring that it is accurate and that there are no discrepancies. The data set includes accurate mapping for all conservation areas, listed buildings, gardens and designed landscapes, archaeology sites and monuments, and battlefields. This ensures that all heritage assets are taking into consideration when preparing the proposed plan.

The site checklists that will be prepared to assess new proposals being considered for inclusion in the next LDP will include a section on historic environment information so that any impacts on heritage assets can be assessed from the outset.

Our Past, Our Future – The Strategy for Scotland's Historic Environment

The strategy sets out Scotland's 5-year national strategy for the historic environment which was published in 2023. The historic environment is a national asset, and it creates jobs, enriches communities, and helps to tell Scotland's story to the world. It's a vital resource in our transition to net zero and in helping local places to thrive. The strategy seeks to enhance the benefits of Scotland heritage and ensuring that the historic environment is at the centre of national life. The next LDP will seek to incorporate the key aims of this strategy and recognise the importance and wide-ranging benefits that Moray's heritage assets can bring.

Conservation Area Review

Local Planning Authorities have a statutory duty under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 to designate as conservation areas parts of their areas which are of special historic or architectural interest the character and/or appearance of which it is desirable to preserve and enhance, as well as to undertake reviews. Ensuring that conservation area designations are reviewed ensures that the historic environment is protected, valued, and managed sustainably.

To support National Planning Framework 4 (NPF4) Policy 7 Historic assets and places which seeks to protect and enhance historic environment assets and places through Local Development Plans, a programme of reviewing Moray's conservation areas has begun.

The first phase of this saw four conservation areas being reviewed (Cullen, Portknockie, Findochty and Archiestown) with character appraisals being prepared for each settlement. Following the review and public consultation changes to the boundaries are being proposed to each one except for Portknockie.

It is anticipated that the next phase in the programme will begin shortly.

Moray Council Replacement Windows & Doors Guidance

A long-standing issue in Moray's conservation areas is the cumulative impact of the installation of non-traditional uPVC and aluminium windows. This has begun to have a detrimental impact on the character of several designations. Timber windows are far more sustainable that uPVC windows and offer the lowest level of embodied carbon meaning that less carbon is released in their construction compared with uPVC and aluminium. Timber windows frames have similar thermal characteristics to timber windows which is often a false perception. If maintained they will also last longer than uPVC which usually have a lifespan of 20 years, after which they need replaced and will end up in landfill which is not an environmentally sustainable approach given the climate emergency. As such, the replacement and retention of timber windows in historic buildings not only benefits the buildings themselves but it also helps with the drive towards net zero.

Moray Council's Replacement Windows and Doors Guidance was approved as a material consideration by the Planning and Regulatory Services Committee and offers guidance for applicants and Officers in implementing Moray Local Development Plan Policy EP9 Conservation Areas. In particular, for unlisted buildings within a conservation area the policy and guidance require that uPVC windows will only be

acceptable if they are of an appropriate traditional style and are not located on a principal elevation or an elevation on a public view.

NPF4 Policy 7 Historic assets and places does not specifically have a criterion on what types of windows are appropriate for unlisted buildings within a conservation area and refers to protecting the character and appearance in more general terms.

As the current LDP policy and guidance goes into more detail on this issue consideration will be given to a tailored approach in the next LDP.

Windows Repair and Replacement Grant Scheme

At a meeting of Moray Council on 10 August 2022, it was agreed to allocate funding from the Place Based Investment Programme towards a small grant scheme for the fitting or repair of windows in conservation areas. In conjunction with the conservation area review that has been undertaken this seeks to enhance Moray's built heritage.

The Windows Repair and Replacement Grant Scheme was set up to help homeowners repair and replace traditional windows in their property. It was open to any property that within one of Moray's 18 conservation areas that met the eligibility criteria. In total eight grants were awarded to properties in Garmouth, Findhorn, Portknockie, and Findochty. The grants helped homeowners replace non-traditional and/or windows that were in disrepair with traditional timber double glazed windows. The fund not only helped to improve the character and appearance of each conservation area but it also helped to ensure that homeowners were improving the thermal efficiency in a sustainable way. Appendix 3 of the Committee Report that reported the recent conservation area review provides some before and after pictures showing the benefit that the fund brough to these properties and the character of the wider conservation area.

A similar grant scheme is underway for the year 2023/24 with another one programmed for the 2024/25 subject to the indicative allocation of Place Based Improvement Funding (PBIF) being approved by the Scottish Government.

Enabling Development

Planning Policy Guidance was prepared to assist with the implementation and assessment of MLDP policies. This included guidance on the enabling development section of Policy EP10. The guidance seeks to provide clarity as to what is required when an application is made for a proposal of this nature. NPF4 is supportive of enabling development proposals but does not go into the same level of detail as the current guidance. As such the proposed plan should consider a tailored approach.

Vacant Buildings/Brownfield Land

NPF4 places a significant emphasis and priority to the redevelopment of brownfield sites. NPF4 defines "brownfield" as land which has previously been developed. This covers vacant or derelict land, and land occupied by redundant or unused buildings. The redevelopment or reuse of brownfield sites and buildings for housing or businesses can bring unused or underutilised sites back into productive use and reduce the need for expansion onto greenfield land. The Council will endeavour to work with owners to help bring these sites back into use through advice or trying to identify funding opportunities for example.

Moray Historic Environment Record

The full version of the database is held and maintained by the Archaeology Service and contains information on over 10,475 known sites of archaeological and historical interest ranging from Late Upper Palaeolithic flints to airfields of World War II. The information consists of a computerised database linked to a GIS with further physical records of maps, photographs, articles and reports. Note the database is not exhaustive and only covers currently known sites.

Scheduled Monuments

Moray currently has 74 designated Scheduled Monuments which are sporadically located throughout the area, both within settlements and in more rural and remote areas. Owing to the nature of the designation there is no meaningful pattern associated with their geographic spread. This reflects the depth of the time period covered by the designation, and the very varied nature of the function, and therefore location, of the remains included.

Analysis of the data shows there is likely to be conflict with development aspirations associated with some of the settlements across Moray where Scheduled Monuments lie within or in the vicinity of the settlement. There may also be conflict which may restrict rural development in some parts of Moray.

The most likely conflict that will occur is where development impacts on the setting of these protected assets. Setting extends beyond the legally defined footprint of each individual Scheduled area into each site's broader landscape context. Both tangible and less tangible elements can be important in understanding the setting, including the relationships between sites such as prehistoric burial cairns where intervisibility between contemporary monuments was crucial. The setting of some of these sites can also be a contributing factor of landscape character.

The majority of Scheduled sites in Moray are situated within a rural context and due to their nature (some being earthworks or are entirely buried and only known from cropmark evidence) are sensitive to the encroachment of woodland and tree planting. Policy 6 Forestry, woodland, and trees will create occasional conflicts for these types of sites owing to the presumption that development proposals that enhance, expand, and improve woodland and tree cover will be supported.

As with potential impacts on setting, each development proposal will need to be carefully considered on a case-by-case basis in conjunction with Historic Environment Scotland

Local Heritage & Unlisted buildings

Through the LDP engagement and LPP process, communities have the chance to highlight buildings that have cultural importance to them that may not be covered by an existing designation. Unlisted buildings outwith a conservation can make a valuable contribution to the sense of place of a town or area. Even though these buildings are not protected or given the status of a formal designation they are often regarded as being significantly important to local communities, not only in the physical sense but also how people have emotional attachments to buildings and assets. This can be critical to defining their "sense of place" within a town or settlement which can be important for mental health and well-being. This could be achieved through recognising them within the Historic Environment Record (HER) database (many such buildings are already included within the database).

Given the lack of a formal designation, unlisted buildings are often vulnerable from inappropriate redevelopment opportunities or demolition. Decisions on proposals for unlisted buildings must be made on planning reasons which often leads to frustration amongst communities where there is that emotional attachment or they contribute to their "sense of place".

NPF4 places a strong emphasis on tackling the climate emergency with the drive to net zero. Local guidance was introduced from 1 July 2023 to support the implementation of NPF4 which requires new developments to be designed to minimise lifecycle greenhouse gas emissions as far as possible and adapt to current and future risks from climate change. Reusing and bringing vacant buildings back into use will be a key element of this strategy with the drive to develop less on greenfield land. In delivering this key aim will be reducing the whole life carbon footprint of a proposal. From this perspective reusing a building and/or materials will significantly reduce the amount of carbon being expended during construction. As such proposals are currently required to demonstrate this through a carbon assessment.

The next LDP will look at this issue in more detail and how unlisted buildings of cultural or historical importance could be given better protection to support the aims of preserving and enhancing unlisted buildings with an emphasis of carbon reduction and meeting net zero.

Undesignated Historic Environment Assets

Analysis of the Historic Environment Record shows there is likely to be conflict with development aspirations associated with all settlements across Moray. It is also highly likely that there will be conflict which may restrict or otherwise influence rural development in some parts of Moray according to the specific site location.

In order to resolve such an inevitable significant issue for development, NPF4 Policy 7 makes provision, in that where impacts cannot be avoided, they should be minimised. Where it has been demonstrated that avoidance or retention is not possible, excavation, recording, analysis, archiving, publication, and activities to provide public benefit may be required through the use of Conditions or legal/planning obligations.

Owing to the density of known archaeological remains across Moray, and the significant potential for further remains awaiting discovery, there is a likely to be significant impact on these remains through any allocation and subsequent development. While the policy preference in the first instance is preservation in situ, the reality is that in the vast majority of cases the mitigation options provided by Policy 7 above will be used when assessing sites, and for ensuring delivery of development in an appropriate and sustainable manner.

Buildings at Risk Register

The Buildings at Risk Register was created in 1990 in response to a growing number of Listed buildings and buildings in Conservation Areas that were vacant and had fallen into a state of disrepair. The Register is maintained by Historic Environment Scotland and provides information on properties of architectural or historic merit that are considered to be at risk. Note the register is not exhaustive and only covers currently identified sites at risk.

Forres Conservation & Heritage Scheme

Early work has begun on the Forres Conservation and Heritage scheme. The project seeks to explore ways to develop, promote and conserve the historic character of the Forres conservation area to boost the local economy. The delivery phase is currently under way which will run until September 2024. If successful, the subsequent Delivery Phase will provide funding over a 5-year period which will not only bring physical improvements to the built heritage but also, improve the local economy by increasing visitors and footfall, promoting traditional skills, and providing more opportunities for social interaction and community cohesion. This work will feed into the next LDP as well as potentially providing the opportunity to align with delivering projects within the Forres Town Centre Improvement Plan (TCIP).

Summary of Stakeholder Engagement

Historic Environment Scotland – see Statements of agreement.

Regional Archaeology Service- comments received have been included within the schedule.

Summary of Implications for the Proposed Plan

- Consider a tailored approach to windows for unlisted buildings within conservation areas based on the existing LDP policy and local knowledge,
- Continue to undertake a review of Moray's conservation areas. Revised CA boundaries to be reflected in the new Local Development Plan.
- Identification of unused or vacant buildings in conservations areas through Vacant & Derelict Land Survey.
- Consider how unlisted buildings of local cultural or historic importance outwith conservation areas could be given better protection.

- Consider potential impact on designated and undesignated historic environment assets, both direct and indirect, on a case-by-case basis. This will be supported through the ongoing updating and maintenance of the HER database.

Statements of Agreement

Historic Environment Scotland

Historic Environment Scotland (HES) note they were satisfied with the sufficiency of the evidence set out within the schedule subject to the inclusion of the data from the Buildings at Risk Register which will support the stated aims relating to reusing vacant buildings and brownfield land. The supporting information that was provided is noted and has been linked to the schedule. However, as stated in HES's response, that while efforts are made to ensure it is kept up to date the information may be outdated. Access to this data is not held by Moray Council.

HES's response states that NPF4 and the Scottish Government's Local Development Plan Guidance should be included as evidence. However, Moray Council considers that these documents are not evidence rather they provide policy context and guidance.

It is the Council's intention to align the site checklists with SEA objectives as suggested by HES.

The following are a summary of other comments provided in the response.
- Consider updating the Windows and Doors Guidance in light of NPF4 and changes to permitted development rights which are being considered.
- Consider updating the Council's Planning Policy Guidance on enabling development to reflect NPF4.
- Support commitment to work with owners to help bring vacant properties back into use with the Buildings at Risk Register being an important tool.

While these comments are more observations rather than relating to specific evidence the comments are noted.

Statements of Dispute

None identified.

Issue: Topic / Place	5. Energy
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15(5)- the infrastructure of the district and how that infrastructure is used.
Links to Evidence	**CD060** Scottish Government Draft Energy and Just Transition Plan **CD037** Moray Wind Energy Landscape Sensitivity Study - 2023 **CD061** Moray Council mapping of operational, consented and proposed onshore wind farms. **CD062** Moray Table of Consented and Operational Wind Farms Over 80m in Moray – (as at 22 Jan 2024) **CD063** Moray Hydrogen Strategy 2022 **CD033** Keith Green Energy and Infrastructure Framework – 2023 **CD034** Keith Green Energy and Infrastructure Framework – Appendix **CD035** Keith Green Energy and Infrastructure Framework – Appendix LSS **CD028** Moray Council Local Development Plan Monitoring Report 2023 **CD007** Moray Climate Change Strategy 2020-2030 **CD064** Scottish Government Onshore Wind Policy Statement 2022 **CD036** Moray Local Landscape Designation Review - 2018 **CD065** Scottish Government Hydrogen Action Plan 2022 **CD066** Moray Council report to Economic Development and Infrastructure Services Committee 6th February 2024 Hydrogen update

National Planning Framework 4 context

LDPs should seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development.

Summary of Evidence

Scottish Government draft Energy Strategy and Just Transition Plan (2023)

The strategy sets out the Scottish Government's plan to transforms the way Scotland generates, transports, and uses energy. This presents a huge opportunity to deliver maximum benefits to Scotland's people, workers, communities, and economy from our vast renewable energy resources.

Targets in the draft Strategy include:
- More than 20GW of additional renewable electricity on and offshore by 2023.
- An ambition for hydrogen to provide 5GW or the equivalent of 15% of Scotland's current energy needs by 2030 and 25GW of hydrogen capacity by 2045.
- Increased contributions from solar, hydro, and marine energy to our energy mix.
- Accelerated decarbonisation of domestic, industry, transport, and heat.
- By 2030, the need for new petrol and diesel cars and vans to be phased out and car kilometres reduced by 20%.
- Generation of surplus electricity, enabling export of electricity and renewable hydrogen to support decarbonisation across Europe.
- Energy security through development of our own resources and additional energy storage.
- A Just Transition by maintaining or increasing employment in Scotland's energy production sector against a decline in North Sea production.

Just Transition Fund

The Just Transition Fund is available in the north-east of Scotland to transition away from oil and gas sector and develop green skills and jobs. Moray Council has secured funding to support a number of projects including developing a Hydrogen Strategy, brownfield site studies, developing the Keith Green Energy Infrastructure Framework and works at Buckie Harbour to support the offshore sector.

The Just Transition Fund could be a key source of funding to link together and deliver projects within the Proposed Plan and evidenced in the schedules for Housing, Natural Capital, Biodiversity and this schedule and support Just Transition bids from other organisations in Moray.

National Grid projects

NPF4 identifies national developments, including the Strategic Renewable Electricity Generation and Transmission Infrastructure project which includes upgrading of the Beauly to Peterhead via Blackhillock overhead transmission line. The project is required to meet UK and Scottish Government climate change and energy security targets. The project helps to accelerate the deployment of homegrown and affordable low carbon electricity generation, together with developing the electricity network infrastructure required to connect and transport this power. Offshore wind energy developments connect into the grid at Portgordon. Moray Council will continue to engage with Scottish and Southern Energy Network (SSEN) on future grid infrastructure projects and this will be reflected in the MLDP 2027.

Blackhillock sub station is the largest in the UK and the second largest in northern Europe. Blackhillock offers the opportunity for co-location of a number of development opportunities which benefit from proximity to green energy source including battery storage schemes and potentially hydrogen production. However, this area has seen significant development pressure and needs to be planned, which has resulted in the production of the Keith Green Energy and Infrastructure Framework 2023 below.

As a result of grid infrastructure improvements, it is anticipated that piecemeal development pressure from development that supports the National Gril, will be experienced in other areas where transmission and distribution infrastructure exist. There is a need to consider how best to provide a policy framework to direct such proposals, for example battery storage, to suitable locations and understand their siting requirements e.g. proximity to sub-stations.

Grid capacity is not seen as a constraint to development and for developer-led projects, SSEN have a legal responsibility to connect developments to the electricity network. Grid capacity is address more fully in Schedule 10a *Infrastructure*.

Keith Green Energy & Infrastructure Framework 2023

The Keith and Blackhillock areas were coming under increasing development pressure, on a piecemeal basis, from development that supports the National Grid and there is no forward planning to identify necessary infrastructure or development potential, which undermines the plan-led system advocated by the Government.

With national developments promoted in NPF4, including Strategic Renewable Electricity Generation and Transmission Infrastructure, a development framework has been developed for the Keith and Blackhillock areas in order to make best use of surrounding land and appropriately control the opportunities arising from renewables associated with the grid infrastructure and energy systems/storage. Based on a landscape sensitivity assessment, the Framework identifies potential development sites for a range of uses and associated landscape mitigation required.

The Scottish Government Onshore Wind Policy Statement 2022

Statement sets an overall ambition of 20GW of installed onshore wind capacity in Scotland by 2030. The Statement recognises that high ambition is delivered in a way that is fully aligned with, and continues to enhance, our natural heritage and native flora and fauna, and supports our actions to address the nature crises and the climate crisis.

Wind Energy Developments in Moray

Moray Council has experienced significant pressure for onshore wind farms over the last 20 plus years. Details of operational, consented and proposed wind farms, extensions and repowering are set out in the evidence table. The table demonstrates that Moray currently has operational and consented capacity for 1,252MW of generation from wind farms (over 80m) alone.

Two areas of significant cumulative impact have/ are emerging at Dallas/ Knockando Moor and Cabrach which have resulted in significant adverse landscape and visual impacts. Moray Council has objected to a number of large-scale wind farms, however despite having up to date local policy guidance and landscape capacity studies/ landscape sensitivity studies adopted, proposals have continued to be consented, contrary to local development plan policy.

The Landscape Sensitivity Study 2023 accords with the NatureScot methodology set out in their Landscape Sensitivity Assessment Guidance 2022. LSS are intended to inform strategic planning for wind energy and to provide information that can assist in the evaluation of specific development proposals and are a tool to help guide development to the best location. The LSS replaces previous Landscape Capacity Studies from 2017 and 2012 and Wind Energy Policy Guidance which has been kept up to date since originally introduced in 2002, endeavouring to provide an up- to- date policy framework to guide developments to the most suitable locations.

The LSS considers broad landscape and visual sensitivities, identifying constraints and opportunities at a strategic scale. The sensitivity assessments have been undertaken on the basis of Assessment Units (page 18/ Figure 3) which are closely allied to Landscape Character types. The study considers the sensitivity of Assessment Units to a limited number of pre- determined turbine types, principally based on height, individual applications need to be considered on a case by case basis with some flexibility on turbine heights being applied within close range of the upper height threshold used in the sensitivity assessment.

A number of the Assessment Units have experienced significant development pressure and the findings for these from the LSS are summarised below.

- Assessment Unit 10 Upland Moorland and Forestry

This landscape accommodates the operational Rothes 1 and 2 and Hill of Glaschyle wind farms and consented Meikle Hill, Clash Gour and Rothes 3 wind farms. The operational Berry Burn and Paul's Hill wind farms and the consented Paul's Hill 2 and Berry Burn 2 extensions are located to the south within the adjacent Open Rolling Uplands. Page 51 of the LSS sets out the key cumulative landscape and visual issues and constraints, including:
- The extensive operational and consented wind farms already located in this Assessment Unit which severely limits opportunities for further development to be located whilst minimising effects on adjacent more sensitive landscapes and on views.

The LSS concludes (page 52) that there would be High sensitivity to turbines >150m and a High-medium sensitivity to turbines <150m. The LSS recognises (page 53) that there may be opportunities to minimise effects on surrounding more sensitive landscape and visual receptors by repowering well sited operational wind farms located in the less sensitive interior of these uplands.

- Assessment Unit 11- Open Rolling Uplands

This Assessment Unit accommodates the operational Berry Burn and Paul's Hill wind farms. The consented Paul's Hill 2, Berry Burn 2 and part of Cash Gour also lie within this landscape. The operational Rothes 1 and 2 and Hill of Glaschyle wind farms are located within the adjacent Upland Moorland and Forestry. The consented Meikle Hill, Kellas and Rothes 3 wind farms are sited close to the Rothes 1 and 2 wind farms in the Upland Moorland and Forestry. Page 55 sets out the key cumulative landscape and visual issues and constraints, including;

- The extensive operational and consented wind farms already located in this Assessment Unit which severely limits opportunities for further development to be located whilst minimising effects on adjacent more sensitive landscapes and on views.

The LSS concludes (page 57) that this landscape has a high sensitivity to turbines >150m and a High-medium sensitivity to turbines 100-150m. Repowering of operational wind farms within the interior of these uplands is likely to provide most scope for accommodating larger turbines whilst minimising landscape and visual effects.

- Assessment Unit 14 Open Uplands with Settled Glens

The operational Dorenell wind farm is located in this Assessment Unit. The consented Garbet wind farm is also located in the northern part of this Assessment Unit. The operational Clashindarrock and Kidrummy wind farms located in neighbouring Aberdeenshire and more distant wind farms in Moray are visible from the hill summits and ridges in this Assessment Unit. Page 67 sets out the key cumulative landscape and visual issues and constraints, including;

- Cumulative effects with any additional wind energy developments seen in combination with the operational Dorenell and Clashindarroch wind farms on the Deveron valley and in views from the A941.

The LSS concludes that this landscape has a high sensitivity to turbines >150m and a High-medium sensitivity to turbines 100-150m.

The LSS (page 71) sets out a summary of findings and recommendations including the need to safeguard landmark hills, less developed upland areas, the coast and wider seascape, extensive forests and dramatic narrow valleys and scenic approaches to Moray, protect the character and special qualities of the Special Landscape Areas and an ongoing review of cumulative landscape and visual effects of multiple wind turbine developments.

The cumulative impact of wind farms is clearly a key issue to be considered as part of the approach to maximising opportunities for renewable energy.

Solar

The focus of development proposals for solar energy in Moray is largely limited to domestic scale. There have been no commercial-scale solar developments in the current Local Development Plan period.

Between 2021 and 2022, 3 domestic-scale applications relating to solar panels/arrays were consented. 8 applications for solar panels/arrays were consented between 2022 and 2023. Four applications were for larger scaled development (317kW; 129kW; 115kW and 110kW) associated with existing business/utility properties.

Battery storage

A number of battery storage proposals have come forward in Moray and been consented in urban and rural locations. These can be land hungry proposals which generate limited employment opportunities beyond the construction phase and this has created a policy tension where these have been proposed on designated employment areas. This has reduced the area available for higher employment yielding uses and results in further employment land having to be identified to meet employment land requirements.

There is a need to consider how best to provide a policy framework to direct battery storage proposals to suitable locations and understand their siting requirements e.g. proximity to sub-stations.

Hydrogen

The Scottish Government Hydrogen Action Plan 2022

Development of a hydrogen economy is a national priority. In December 2020, the Scottish Government published a Hydrogen Policy Statement which aims for Scotland to be a "leading hydrogen nation in the production of reliable, competitive, sustainable hydrogen". The Action Plan supports the Government's targets to achieve net zero greenhouse gas emissions by 2045 and a 75% reduction by 2030 against the 1990 baseline. Achieving these targets means that actions will be required at an unprecedented pace to enable steps towards net zero, within which development of a hydrogen economy could be a key element. The sixth Carbon budget report from the Climate Change Committee suggest that hydrogen production in the UK could scale up to 90TWh by 2035, which is the equivalent of a third of the current power in the UK.

The Action Plan recognises that hydrogen can be used to decarbonise many parts of our economy, including industry, transport, power and heat. Transported through the gas grid it could help decarbonise commercial premises and make a contribution to decarbonising home energy use. For energy intensive industries, switching to hydrogen is considered one of the limited viable options for significant decarbonisation over the next 10 years.

Moray Council Hydrogen Strategy 2022

Moray has access to significant sources of green renewable power including offshore and onshore wind farms which, subject to contract, could create the conditions required to produce green hydrogen within Moray at scale.

The Council has approved a Hydrogen Strategy on 6th September 2022 which aims to support the Scotland Hydrogen Action Plan. The Council is exploring opportunities with partners to develop pilot projects and considering suitable hydrogen production and refuelling sites. A report to the Council's Economic Development and Infrastructure Services Committee on 6th February 2024 approved a Scoping Report for delivery of Phase 2 of the Moray Hydrogen Strategy.

Developing a hydrogen economy in Moray during the short to medium term, including connecting into adjacent areas, could:
- contribute towards a reduction in greenhouse gas and particulate emissions;
- improve the security of Moray's energy supply;
- increase and make better use of local renewable energy generation; and
- help to address fuel poverty issues, particularly in rural areas.

To deliver a hydrogen economy the following key steps are proposed in the Moray Hydrogen Strategy:
- In the short term (2023-2030): Create a hydrogen steering group within Moray to drive the development of hydrogen opportunities, stimulating both supply and demand. This group is led by Moray Council and includes key stakeholders from the industrial base and wider community.
- Develop a pilot project to generate demand for hydrogen locally. A small-scale pilot project or projects are proposed to include combined hydrogen generators, storage and refuelling at a single site. The potential locations to be considered are Lossiemouth, Aberlour, Buckie Harbour, Keith and Elgin.
- In the short to medium term, the aim is to expand the hydrogen generation facilities to further stimulate the demand from road freight transport and from the industrial users such as the distilleries.
- In the long term (beyond 2040), the hydrogen economy for Moray could be based on generating hydrogen from green electricity sources within Moray, purchasing hydrogen from

outside the area, and distributing hydrogen through the area through a pipeline network. The demand for hydrogen would come from a wider range of sectors including the distilleries, other high-heat industry, the road haulage industry, council services and potentially to heat homes and businesses.

To progress delivery of the Moray Hydrogen Strategy a grant from The Just Transition Fund was received. This allowed development of a scoping report for the delivery of Phase 2 of the Hydrogen Strategy. This research recommended to separate the pilot into two aspects – an initial small pilot for Council fleet vehicles using hydrogen from outwith Moray, and the later development of public refuelling facilities as the hydrogen economy matures.

The Council is exploring a pilot project with a small number of hydrogen vehicles as part of our fleet of vehicles. An initial pilot should include refuelling facilities for Council vehicles at the depot using a hydrogen fuel supply from outwith Moray.

Socio-economic benefits from Energy Developments

NPF4 Policy 11 c) states that "Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities."

Moray and Highland Councils jointly commissioned Biggar Economics to undertake a review of Socio-economic benefits arising from energy related development and to consider whether they were being maximised and if not, to develop a methodology to maximise benefits. This is discussed further in the schedule on Community Wealth Building.

Summary of Stakeholder Engagement

Copies of this schedule were sent to the following organisations:
- Cabrach Trust
- RenewablesUK
- Scottish Hydrogen and Fuel Cell Association
- SSEN Transmission and SSEN Distribution
- Finderne and Speyside Community Councils
- Scottish Gas Networks

Summary of Implications for the Proposed Plan

- The Proposed Plan should consider a tailored local policy approach to maximise renewable energy opportunities in Moray.
- The Proposed Plan should consider a tailored local policy approach to onshore wind energy to direct the right development to the right place, reflecting the concerns regarding cumulative impact and the need to balance with opportunities for woodland expansion, peatland restoration and food production.
- The Proposed Plan should consider policy position to direct waste to energy projects to suitable locations.
- The Proposed Plan should support development of a hydrogen economy, identifying opportunities for production and refuelling sites.
- The Proposed Pan should identify the route of national grid upgrades and other key energy infrastructure and consider a tailored local policy approach for associated supporting development in order to direct the right development to the right place, reflecting concerns regarding cumulative impact.
- The Proposed Plan should consider policy position to protect designated employment land from renewable energy and National Grid-associated development.

Statements of Agreement

Finderne Community Council

Finderne Community Council previously took the position of objecting to new windfarm proposals in the area, participating in the Public Local Inquiry on the Clash Gour wind farm. Policy of the community council is now to maximise benefit to the local area.

However, many people within the community do not wish for any further proliferation of wind farms on the hills and moorland in the Finderne area. Concerns regarding industrialisation of a rural landscape, impacts of wildlife, risk of wildfires due to changed habitat management practices and potential impact of turbine lighting at night.

Finderne Community Council has discussed battery storage proposals near Berryburn wind farm and the proposed new transmission route and have raised no particular concerns about these.

SSEN Distribution

SSEN has identified no areas of dispute but suggested some additional evidence to consider.
- Distribution Future Energy Scenarios: 2022 reports available here: SSEN Distribution Future Energy Scenarios - Regen; 2023 reports available April 2024
- Network Development Plans: Network Capacity Information - SSEN
- Smart and Fair: Working with the smart energy capabilities lens - Smart and Fair: working with the smart energy capabilities lens - Centre for Sustainable Energy (cse.org.uk)
- A Fair Energy Future: Unlocking a Just Transition for Consumers - ssen-a-fair-energy-future.pdf

SSEN Transmission

National Grid Projects

- Recommend replacing "National Grid projects" with Electricity Grid Developments" to define the topic being related to electricity. As a means of comparison, Gas has its own national grid. National Grid is also a separate company to SSEN Transmission, so use of this phrase could be misleading. SSEN Transmission is the only electrical transmission operator in the north of Scotland. National Grid, as a company, operate in England and Wales.
- The renewable energy target should say "2030" instead of "2023".
- As per our presentation to planning officers in August 2023, we'd welcome the distinction between SSEN Transmission and SSEN Distribution, rather than the generalisation of "SSEN". Whilst both companies are important electricity grid providers, they play different roles and operate separately of each other as per our regulated licensing requirements.
- Blackhillock substation is owned and managed by SSEN Transmission
- It would be helpful to reference that SSEN Transmission's future grid investment is part of a Great Britain (GB) wide plan that is led by National Grid ESO (Electricity System Operator) and needed to achieve the UK and Scottish Government's 2030 renewable energy targets.

Council response - Agree to the minor changes requested.

Socio-economic benefits from Energy Developments

- We haven't had sight of the schedule on Community Wealth Building. It would have been useful to have seen this.
- As a business regulated by OFGEM in the interest of the electricity consumer, there will be limits to what SSEN Transmission can offer in this respect of community wealth building and socio-economic benefits. As part of our forthcoming work on our Accelerated Strategic

Transmission Investment (ASTI) projects, we will be introducing a pot of money that called a Community Benefit Fund. The sum of offer has not yet been finalised, but this will enable charities and communities groups to apply for funding from it. Community Benefit Fund - SSEN Transmission (ssen-transmission.co.uk).

- Between now and 2030, SSEN Transmission expects investment in transmission grid projects to exceed £20 billion. Moray will undoubtedly benefit from this investment socio-economically.

Council response - Noted, however National Planning Framework 4 Policies 11 and 25 bring the maximisation of net economic benefit and community wealth building into the planning system which is a significant change to community benefit.

Battery storage
- On "Battery Storage", it would be fair to say that the close proximity of battery storage sites to SSEN Transmission substations has restricted SSEN Transmission's ability to make extensions to their existing substations and therefore have had to look at sites detached from their existing sites to meet transmission grid upgrades.

Solar
- A large commercial scale Solar Farm south of Lintmill is coming forward. It may only be at Section 36 (under Electricity Act 1989) pre-app stage.

Council response - Noted.

Speyside Community Council

Fully support the summary of implications for the proposed plan. However, have concerns that the Scottish Government will continue to overturn locally made decisions.

Statements of Dispute

Speyside Community Council

Speyside Community Council made the following general observations formed as a result of Speyside Community Council's experiences of the planning process.

1) NPF 4:
   - From the layperson's perspective, it seems that the framework has been written by people who are working in isolation from each other. Many of the Principles/Policies do not complement each other particularly well and in some instances seem to contradict one another.
   - One could be of the opinion that this is the urban elite telling rural communities what is good for them.
   - The Framework is easily interpreted in diverse ways and frequently is.

2) Scottish Government Draft Energy Strategy and Just Transition Plan (2023): Many of the targets will be very difficult, if not impossible, to achieve e.g. accelerated decarbonisation of domestic, industry, transport, heat and maintaining or increasing employment in Scotland's energy sector. 'Green jobs' are disappearing.

3) National Grid Projects:
   - We think that it is debatable as to whether or not there is affordable low carbon electricity generation when so many households are in fuel poverty.
   - Grid capacity may not be a constraint but constraint payments, paid by bill payers, to windfarms exacerbates fuel poverty. Enough battery storage will take some years to install.

4) The Scottish Government Onshore Wind Policy Statement:
- It is difficult to reconcile windfarm expansion with enhancing our natural heritage and native flora and fauna.
- Statements are easy to make. Visible proof is not obvious.

5) Wind Energy Developments in Moray:
- SCC fully supports Moray Council's comments regarding the Scottish Government's position in overturning decisions made by Moray Council. This demonstrates a significant lack of democracy, in our opinion.
- Despite having up to date local policy guidance etc, we do not expect this situation to change and, SG will continue to over-rule democratic decisions.
- Unfortunately, we are hearing more and more that people are reluctant to engage in the planning process as they perceive that the outcome is a foregone conclusion.

6) Battery Storage: SCC has concerns regarding the safety of battery storage. We need more information.

7) Socio-Economic Benefits from Energy Developments: NPF4 Policy 11c. It would be interesting to see Biggar Economics Review. While there may be many local jobs and business opportunities during the construction period, most of these will disappear when the windfarm is operational.

The Community Council has also commented that the Moray Woodland and Forestry Strategy Supplementary Guidance should be added to this section, but unsure if the draft of the new strategy has been completed and /or approved. Renewable energy proposals and woodland/ forest creation both impact on the climate emergency, the nature emergency and ultimately in potential changes of land use.

Community Council believe that the two should be considered together as having cumulative effects on the natural environment and current land use, it cannot be only windfarms that are subject to cumulative effect.

35% of Moray is covered in woodland, how much land is taken up by windfarms? That probably leaves about 50% of Moray for housing, farming and other industries. It feels as though people are being squeezed out.

Acknowledge that Moray Council is not responsible agency for woodlands/ forestry but does have a part to play in a consultancy role.

Council response - Noted concerns regarding national policy approach and concerns regarding cumulative impacts as expressed in the evidence.

The Council is exploring a regional land use partnership approach to how the different, sometimes conflicting, sometimes complementary approaches to land use planning come together and the Regional Spatial Strategy will provide a strategic approach to this.

The report on Socio- economic benefits by Biggar will be consider by Council on 24th April 2024 and will be made publicly available.

Cabrach Trust

The Carbrach Trust made the following observations.

1) The policy approach to current and future renewable energy projects is a key consideration closely linked with all aspects of regeneration of the Cabrach, including preserving and enhancing the existing special features of the landscape, through the fair and just

transformation of the locality. At this stage the Trust wishes to set out its view on the context that should inform the development of policy.

2) The 2023 Q3 energy statistics were published in December 2023 and when compared to the 2023 Q4 statistics, the main changes are in the pipeline figures which continue to show that the official energy statistics are now recognising the clear potential for excessive generation provision when the 41.2GW figure is compared with the OFGEM predicted peak future 2050 Scottish demand figure of 9.4GW. This conclusion becomes even more pronounced if the likely future outputs from all of the Scotwind offshore leases are also included, leading to a potential generation of over 70GW, almost 8 times the predicted future peak demand.

3) A similar situation arises in relation to the suggested provision of very significant new Overhead Transmission Lines and very substantial sub stations as proposed by SSEN. As set out by OFGEM and National Grid ESO, the strategic intention behind this proposed infrastructure is to connect offshore wind farms to consumers in the south of England. To date, despite being asked many times by various local groups, SSEN have failed to list the offshore wind farms that the proposed infrastructure has been designed to serve. The objective in seeking that information is to test the need case and, therefore, in the absence of that information there is no established need case for what is being proposed. This focus on the need case stems from the Dalmally OHL proposal Public Local Inquiry in Argyll and Bute. During the oral evidence sessions SSEN were forced to admit that the consented capacity of the wind farms awaiting connection through this proposed new infrastructure amounted to just 6% of the proposed capacity of the OHL. The other 94% was speculative provision for future as yet undetermined wind farm applications.

4) The Carbrach area already has two operational wind farms and two consented but unbuilt wind farms (as well as three other wind farms at various planning stages). Given the energy baseline, it is the view of the Trust that there is absolutely no need for any further wind farms (and related infrastructure) in the Cabrach. The emerging policy focus should be on natural heritage, regeneration and a just transition, themes that will be set out in the Local Place Plan that is currently being prepared.

5) How we collectively position the standing of the 2023 LSS is an important matter. The LSS methodology and findings are strong, and the Trust's cumulative impact concerns align strongly herein. The evidence template notes the Cabrach specifically by way of cumulative impact concern, which further piques puzzlement within the community with regards Moray Council's position not to oppose Clashindarroch Extension wind farm. Worth noting here is that Richard Lochhead MSP maintains that concern, recently writing to the Cabinet Secretary for Wellbeing Economy, Net Zero and Energy.

6) Beyond the Cabrach's status as a centuries old settled glen, the position of landmark hills herein, and associated scenic gateway status, we believe the particular nature and fragility of our upland ecology and importance of the upper river Deveron catchment requires emphasis. Further onshore wind development, including battery storage, in this locality risks irreversible damage associated with surface water run off (and associated river health and downstream flooding risks), ground water imbalance (PH and private water supply), habitat damage and loss, and negative impacts on significant moss and peatlands.

7) With reference to Just Transition and Just Transition Fund, both form a critical part of our regeneration vision and strategy for the Cabrach. That strategy has been cited as a potential exemplar for rural regeneration and Just Transition in action, although this could equally be

undermined by cumulative impact. Is this worth referencing in the LDP? For context, the Trust has now successfully secured Just Transition funding across years 1 and 2 of the fund; via the Scottish Government in Year 1 and via Social Investment Scotland in Year 2.

8) Purported socio-economic benefits, including increased local employment, associated with onshore wind developments are ever increasingly proving to be inaccurate, inflated, misleading, or untrue. This matter, alongside the increased public awareness associated with exorbitant constraint payments costs, is being increasingly reported on locally and nationally, causing further disquiet. The Trust welcomes sight of the Biggar Economics Review.

Council response

Comments noted. The Regional Spatial Strategy and new Local Development Plan offer the opportunity to provide a strategic vision of just transition in Moray. The Council is currently considering a number of workstreams and how they can be aligned into a comprehensive just transition project.

The Biggar Economics Report and draft supplementary guidance relating to National Planning Framework Policy 9 regarding socio economic benefits will be presented to Moray Council on 24 April 2024 and thereafter be subject to 12 weeks public engagement.

Issue: Topic / Place	6. Design, quality and place
Information required by the Act regarding the issue addressed in this section	Town & Country Planning (Scotland) Act 1997 Section 15(5)(a) 'the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district'
Links to Evidence	**CD001** Moray Local Development Plan 2020 - Volume 1 - Policies **CD045** Moray Planning Policy Guidance - MLDP **CD067** Moray Council Supporting Document for Policy PP1 Placemaking **CD068** Moray Council Quality Audit Template **CD069** Moray Council Quality Audit 2015 **CD070** Moray Council Quality Audit 2020 **CD071** Moray Local Development Plan Monitoring Reports 2019 **CD072** Moray Local Development Plan Monitoring Report 2021 **CD028** Moray Local Development Plan Monitoring Report 2023 **CD025** Moray Council Biodiversity Duty Report 2021 – 2023 **CD007** Moray Council Climate Change Strategy 2020 – 2030 **CD029** Moray Council Open Space Strategy – Supplementary Guidance 2018 **CD073** Mobility Mood Place **CD074** Public Health Scotland Strategic Plan 2022 – 2025 **CD075** Moray Council Active Travel Strategy Annual Update 2023 **CD076** Transport Scotland – A routemap to achieve a 20% reduction in car kilometres by 2030 **CD077** Community Safety Strategy **CD078** Moray Council Active Travel Strategy 2022 – 2027

National Planning Framework (NPF) Context

Policy 14 Design, quality and place requires LDP's to be place based and in line with the Place Principle. LDP's should provide clear expectations for design, quality, and place taking account of local context, characteristics, and connectivity of the area. Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

The detailed Placemaking policies in conjunction with the Quality Audit (QA) process in both the Moray Local Development Plan 2015 & 2020 have been successfully delivering the outcomes of the 6 qualities of a successful place as set out in NPF4 (and previously Scottish Planning Policy (SPP)) in a Moray specific context. This tailored approach to placemaking has ensured that all developments are:

- Well connected to support walking and cycling by providing good active travel routes to support healthy living;
- attractive through creating distinct places that represent their locality with the requirement for developments to provide distinct character area;
- Create safe and welcoming communities that have been designed to be inclusive and accessible for all as well as being designed to reduce crime and antisocial behaviour;
- support climate change and biodiversity by embedding blue and green infrastructure into developments by recognising this as key design component; and
- providing high quality inclusive and accessible open spaces to encourage social interaction throughout communities supporting good physical and mental wellbeing.

These detailed placemaking policies have the NPF4 principle of Local Living embedded throughout and recognise the importance of creating well-designed mixed-use neighbourhoods and all the associated health benefits that come from them. Further information on this policy area can be found in the Local Living schedule.

Summary of Evidence

Introduction

The Moray Local Development Plan (MLDP) 2015 first introduced Placemaking as a Primary Policy. Along with the Urban Design SG, it was the first time that a MLDP had its own specific policy relating to Placemaking with the aims of achieving higher standards of Urban Design. Good placemaking brings not only improvements to the physical urban fabric but also wider benefits to society through supporting good physical and mental health, reducing health inequalities, and improving people's wellbeing, and supporting nature, biodiversity, and climate resilience. The policy was deemed to be successful in improving standards of urban design. However, it became clear through the operation of the policy that further clarity over what was required to meet the six qualities of a successful place was required.

Placemaking was further emphasised and embodied in the MLDP 2020 with PP1 Placemaking being the first Primary Policy in the plan. This Policy reflected the 6 Qualities of a Successful Place in Scottish Planning Policy (SPP) but was much more detailed and prescriptive and tailored to issues identified in Moray. It also recognised the importance of placemaking in improving people's mental and physical health. For example, the aspirations of the Mood, Mobility and Place project identified the benefits of co-design to support outdoor activity, health, well-being, and inter-generational community engagement and interaction which were all incorporated into the policy.

Key Design Principles

For certain sites within the MLDP 2020, key design principles were prepared to assist deliver high quality layouts in line with the placemaking policy. These principles were shown graphically on a plan and highlighted key design components such as connections, open space, character areas etc that must be incorporated into any planning application. This helped to provide site specific element to the placemaking policy. Should a tailored approach to placemaking be considered then key design principles could also be considered as part of this approach.

Masterplans

Over both the MLDP 2015 and 2020 period several masterplans were prepared. These range from smaller sites such as at Kinloss Golf Club to much larger longer term growth areas such as at Elgin South, Buckie South, and Findrassie. For these larger growth areas, the masterplan approach ensured that the principles of good placemaking were embedded from the outset and that all required infrastructure could be identified from the start. This allowed space for facilities such as shops, community facilities, and schools to be provided from the outset which supports the principle of local living and creating walkable neighbourhoods. Having these principles embedded within masterplans allows them to be delivered through the QA process at the Development Management stage.

Moray Council Supporting Document for Policy PP1 Placemaking

A number of representations challenged the level of detail provided in PP1 at the proposed plan stage. In response, Officers prepared a supporting document showing how the policy sought to improve the standards of urban design. The paper clearly demonstrated how the policy incorporated and met the aspirations and aims of several key policy documents ranging from Scottish Planning Policy (SPP), Designing Streets, Scottish Government Place Principle and Scottish Government/COSLA Public Health Priorities for Scotland. Showing how these strategies were embedded into the placemaking policy were key so that the wide-ranging benefits that placemaking can bring would be delivered in a Moray context.

This paper also highlighted design issues that were specifically related to Moray as evidence to justify the more detailed and tailored policy approach of PP1. As has been explained good design can play a significant role in improving both physical and mental health and therefore it was a fundamental element of the policy. The policy sought to deliver these benefits through creating places with character and identity and addressing some key issues that were identified as being specific to Moray. As highlighted in the table below, the placemaking policy has delivered significant improvements on a number of areas which has knock on wider benefits for residents and wider society. Ensuring that these design issues are addressed so that the benefits were delivered could only have been achieved through the clarity provided from the detailed policy and QA process.

As this schedule will conclude, PP1 is already considered be delivering the outcomes of NPF4 Policy 14 Design, quality and place. Given that it also incorporates wider policy strategies there is sound and considerable evidence to justify continuing with tailored approach to Placemaking in the next LDP.

Quality Audit (QA)

MLDP 2015

To support Moray Council's desire to improve the standards of Placemaking a QA process was introduced to assess Planning Applications against the Placemaking Policy. This was first introduced in 2015 in support of the MLDP 2015 Placemaking (PP3) Policy. Officers tested and trialled the Scottish Government's Place Standard tool to assess proposals as well as the CABE Building for life tool as it was felt this was more suited for housebuilders. However, the Place Standard was deemed to be more suited to community planning and a tool more tailored to the planning application process was required to achieve the desired improvements to layouts from an urban design perspective.

Officers from Strategic Planning and Development devised their own bespoke tool that used a traffic light system to assess proposals against the placemaking policy criteria. This tool focused more on the key Urban Design principles within the policy, but it looked at urban design holistically and encapsulated other policies such as open space and biodiversity for example.

The initial QA assessed proposals against 12 key urban design criteria including connections, character and identity, open space, and landscaping. The QA took a multi-disciplinary approach to assessing proposals and facilitated joint working and shared learning between services. Led by Officers from Strategic Planning and Development the placemaking qualities of proposals were assessed by Officers from Transportation Services, Flood Risk Management, Housing Services, NatureScot, NHS Grampian, and Development Management.

The initial QA operated a traffic light system where proposals were marked "red" where it failed to meet the policy criteria, "amber" where it complied with the policy, but the design could be improved, and "green" where the proposal was deemed to fully comply. Where a design category was not deemed to comply with policy clear mitigation would be passed to the applicant as to what they need to achieve to fully comply.

In recognition, the QA was the subject of a Scottish Award for Quality in Planning (SAQP) in 2018 as an example of best practice and has generated significant interest from other planning authorities and has been replicated elsewhere.

MLDP 2020

The QA process was revised to reflect MLDP 2020 Primary Policy (PP1) Placemaking. This Policy was more detailed and went further than the previous policy by looking all of the key elements that fall under the good Placemaking holistically. While certain design elements such as Biodiversity, Open Space, Trees and Woodland, Active Travel for example all had their own individual policies in the MLDP, they were also included within PP1 and the revised QA. This was to recognise the importance that these issues are to creating successful places and so that they could be looked at as part of the wider placemaking

assessment. These key placemaking elements are all recognised in the 6 qualities of successful place in NPF4 Policy 14 Design, quality, and place.

While preparing the MLDP 2020, Monitoring Reports at the time highlighted that several applications were scoring a high number of "ambers" which was deemed to be excessive and meant that higher standards could potentially be achieved. One notable change to the QA in support of PP1 was the removal of the "amber" category so that proposals were either deemed to comply or not with policy. This removed an ambiguous element of the QA where a proposal could be deemed to comply with policy but not meet the highest standards that the Council felt could be achieved. In conjunction with Planning Policy Guidance that was prepared by Officers from Strategic Planning & Development, this was deemed to not only push for better designs but also to provide clarity to developers as to what was expected.

In 2020 Officers attended the Local Authority Urban Design Forum (LAUDF) where the QA process featured as a discussion topic and has been used as case study by Architecture & Design Scotland about how the process embodies the place principle to assess the place quality of developments. The LAUDF allowed Officers to share experiences with other professionals on assessing the placemaking qualities of proposals.

NPF4 – Policy 14 Design, quality and place, Annex D

NPF4 Policy 14 Design, quality and place aligns with the aims of the current MLDP 2020 and the two placemaking policies are not in conflict with each other.   As stated, PP1 Placemaking already has the 6 qualities of a successful place from SPP embedded into it and has been delivering those design outcomes over the MLDP 2015 and 2020 plan periods. However, PP1 Placemaking goes into more detail than Policy 14 on specific issues relating to Moray providing clarity to both Officers and applicants as to what is required.

As has been demonstrated there is significant evidence showing that the current more detailed policy approach of the MLDP 2020 is delivering the aspirations of NPF4 in a Moray context. However, PP1 Placemaking goes into more detail than Policy 14 on specific issues relating to Moray providing clarity to both Officers and applicants as to what is required. Having these clear, concise, and unambiguous policy criteria (supplemented by guidance) has been essential in helping to deliver the aspirations for productive, sustainable, and liveable places.

Given that NPF4 now forms part of the Moray 'development plan' the QA has been reformatted to align with the 6 qualities of a successful place and Annex D. The QA update streamlines the assessment of the design quality of development proposals against the relevant development plan policies clearly and consistently and NPF4 via one collective process and provides further clarity of the interpretation of the 6 qualities of a successful place set out in NPF4 in a Moray context. This approach not only ensures that proposals comply with the current MLDP policy but also the aspirations of NPF4 and Policy 14 Design, quality and place to create well designed and successful places.

The two iterations of the Placemaking Policy and QA's have deemed have been successful in delivering high quality developments and which is reflected in the 2019, 2021, and 2023 Monitoring Reports where trends and observations were monitored (see below). As the aims of NPF4 and the desire of Moray Council to continue to improve Placemaking are aligned there is significant and strong evidence to justify the continuation of a tailored approach to placemaking in Moray. In conjunction with the QA this will ensure that NPF4 Policies are met as well as the continuing the positive outcomes that have been achieved through the previous MLDP placemaking policies.

Moray Council Planning Policy Guidance

Planning Policy Guidance was approved by Moray Council in support of the MLDP 2020. The guidance covered a number of topic areas including Placemaking and provides clarification on policy requirements for developers as well as helping assess proposals through the QA process.

The following is a summary of some key design areas which the guidance covers which are relevant to the interpretation of the Placemaking Policy:

- **Parking** – The issue of streets and developments being visually dominated by parked cars is a long-standing issue. The removal of cars from streets brings many benefits in terms of making streets more visually attractive, encourage social interaction, increased natural surveillance, and increasing biodiversity as more space is left for gardens and boundary treatments. The guidance provides clarity on section (vi) Parking of PP1 and provides examples of what types of arrangements are deemed acceptable.

- **Placemaking Statement** – Further detail and a template as to what type of information is required to be submitted. This covers a number of key design areas with examples of good practice to help applicant achieve green in the QA.

- **Landscaping –** Detail of what type of species will be acceptable in developments. Provides information relating to what species will support biodiversity and provide seasonal colour and pollination opportunities.

- **Biodiversity –** Applicants must provide biodiversity statements which must be a standalone document. The guidance provides information as to what is expected and what must be demonstrated by applicants.

- **Safe Environments –** Detail on how layouts can be safe and welcoming by designing out opportunities for crime and anti-social behaviour. For example, having public fronts and private backs, the use of "turn a corner building" on key plots, and ensuring that all paths and areas of open space are overlooked with good natural surveillance. Good lighting will also play an important role in addition to natural surveillance to create safe spaces, particularly in the darker months.

- **Inclusive and Accessible Play** - Play areas in new developments must be inclusive and accessible, providing children and young people of different abilities with equal access to high quality social and play provision. The guidance provides clarity as to what exactly is expected to be provided with a park hierarchy setting out how many pieces of equipment must be provided including inclusive, non-inclusive and wheelchair specifications. The next LDP will continue to seek to ensure that all open and green spaces including allotments are fully accessible for all users.

Key Trends, Delivered Improvements, & Benefits

The 2019, 2021, and 2023 Monitoring Reports contain updates as to how both the MLDP 2015 and 2020 Placemaking policies have improved standards of urban design. The placemaking principles contained within these policies has also successfully been integrated into several adopted masterplans such as Elgin South, Findrassie, Dallas Dhu, Bilbohall, and Buckie South. Having these key placemaking principles embodied into masterplans ensures that high quality developments in line with the MLDP are delivered at the planning application stage.

While every planning application is site specific there have been some common areas that have seen significant improvements since the introduction of the placemaking policies and QA process. The following table provides a summary of some of the key trends and observations highlighted in the Monitoring Reports that demonstrate how the policies are improving layouts ensuring that they are delivering the outcomes of NPF4 Policy 14 Design, quality and place, the 6 Qualities of a Successful Place, and PP1 Placemaking.

Design Category	Key Improvements	Benefits
Character & Identity	• Placemaking statements are submitted with all applications over 10 units.	A number of wide-ranging benefits are being delivered as an outcome

	Officers have ensured that these provide a thorough townscape analysis to ensure that the development is reflective of the location in terms of street pattern, architectural details, landscaping, natural features/topography etc. • Increased use of CGI/3D visualisations to aide assessment. • Greater differentiation between different character areas is now being achieved that goes beyond different house types. This includes variation between renders, street materials, landscape/planting, and architectural details. • Introduction of key buildings that are different from other buildings in the development.	of the improvements to these key design areas. These could only have been achieved through the detailed nature of PP1 Placemaking. As a result, well designed places benefit residents and communities through the creation of safe and welcoming environments which has knock on benefits for mental health and well-being. The following are a summary of some of the key benefits attributed to improving these key design areas as a result of PP1. • Well-designed developments that are reflective of their surroundings and promote a "sense of place" are beneficial for mental health and wellbeing of residents.
Connections	• Layouts are permeable and legible. Long cul de sacs are not accepted. • Safe and well overlooked connections (including active travel) are provided to support healthy lifestyles. • Active travel infrastructure such as bike lockers and shelters are provided in every development to encourage active travel.	• The significant reduction in streets being visually dominated by parked cars helps to create more attractive streets that prioritise people over cars. It also helps to encourage social interaction and biodiversity by increasing the size of front gardens. This also helps to create the perception that streets are designed for people and not cars and therefore walking is encouraged. Creating opportunities for social interaction is a key component of good design and creating healthy and inclusive communities.
Open Space	• Significant reduction in areas classed as being "leftover". All proposals must comply with the quantitative and qualitative aspect of Policy EP5 as well as PP1. • Open spaces have clear multi-functional benefits such as providing play areas, seating areas, blue/green habitats, and food growing opportunities so that they are inclusive and encourage social interaction. For example, this has been achieved through raised beds. • Delivery of high-quality play areas and open space are inclusive and accessible. This ensures that at least 50% of play equipment provided in play areas is to inclusive standards and integrated throughout the layout. • All open spaces are planted with a variety of species including shrubs, fruit trees, and woodland planting to create attractive spaces with seasonal variation that supports and enhances biodiversity.	• Well-connected routes that support active travel seek to prioritise cycling and walking over the car improving physical and mental health as well as addressing climate change. • Health and well-being is supported through the provision of high quality multi-functional open space. Seating areas provide opportunities for rest,

	• Integration of blue infrastructure has increased significantly as there is a desire to move away from large single SUDs ponds. Rain gardens and planted swales are now common features in layouts.	social interaction, and inter-generational mixing. • Play areas that are accessible an inclusive for support the delivery of healthy vibrant and inclusive communities.
Affordable Housing	• Affordable and accessible housing integrated into developments and on the same street to promote community cohesion and inclusivity. • Continue to promote "tenure blind" affordable housing so that there is no differentiation between private and affordable housing.	• Increased and varied planting across development not only supports biodiversity and links to nature networks but also helps to improve the mental wellbeing of residents.
Car Parking	• The visual dominance of parked cars in developments is a recurring and longstanding problem that was identified in previous Monitoring Reports. Streets that are visually dominated with parked cars are visually unattractive, limit opportunities for social interaction, reduce garden size and opportunities for biodiversity enhancement, and create the perception that streets are for cars and not people. • The requirement for 50% of parking on all streets to be behind the building line has seen significant improvements made to the character of streets as they are less visually dominated by parked cars. • Parking plans are now being provided by applicants showing how the layout complies with policy as well as allowing an easier assessment to be undertaken.	• Food growing opportunities such as raised beds or food growing trees shrubs provide and encourage social interaction within communities. However, the next LDP will need to ensure that these are fully accessible ie are designed for wheelchair users and are waist high. • Well-designed neighbourhoods and open space are designed to reduce crime and anti-social behaviour by providing spaces that benefit from natural surveillance.
Landscaping	• The standard and quality of landscaping plans has improved which reflects the importance that landscaping can have on the character of a development. Recently approved landscape plans provide details relating to numbers, species, height and girth of trees, as well as providing seasonal variation and food growing opportunities. As such the conditioning of landscape plans is now no longer acceptable.	
Biodiversity	• Biodiversity plans must be submitted as an individual document demonstrating how proposals support and enhance biodiversity. Simply providing a landscape plan is not accepted.	

	• A number of features such as bat boxes, hedgehog highways and a greater variation of plants, shrubs, and trees all provide greater seasonal variation and pollination opportunities are all now standard in developments. • The continued integration of blue infrastructure through swales and rain gardens are becoming standard design features and not only improve the visual appearance of developments but also improve and support biodiversity.	
Public Art	• Since the adoption of the MLDP 2020 all developments must include public art. This not only brings an attractive element to developments, but it also helps to enforce the sense of character and identity. The additional planning policy guidance that was prepared seeks to provide clarity and help developers understand what is expected.	

While only a summary of some of the key placemaking outcomes that have delivered, these could only have been achieved through the strong and clear policy framework that clearly sets out what is expected to deliver successful places.

20 Minute Neighbourhoods

NPF4 requires LDP's to support local living through the spatial strategy, associated site briefs, and masterplans. Separate schedules covering Local Living and Infrastructure have been prepared providing further detail and discussion on these areas.

Placemaking will play a fundamental role in delivering this aspiration whether through individual planning applications or wider masterplans. A number of masterplans have been prepared such as Findrassie, Elgin South, and Buckie South which sought to create walkable mixed-use neighbourhoods which support the aspirations of local living. These masterplans have had the policy principles of PP1 embedded into them and in conjunction with the QA this is ensuring that these are delivered on the ground.

Active Travel

The Council's Active Travel Strategy 2022 – 2027 aims to build on the increase in walking and cycling in Moray over the next five years. The plan embeds the ethos that Active Travel has many benefits to both communities and individuals and has a number of positive outcomes for public health, social inclusion, reducing the environmental impact of transport and for supporting local economic activity. National priorities of walking, wheeling, cycling and public transport over single occupancy car use, will be embedded in Council decision making to address any challenges and achieve key priorities. The Active Travel Strategy Annual Update 2023 provides an update on the progress that has been made as well as a programme of schemes for the next 5 years. Schedule 10 b Transport has been prepared covering in detail how the next LDP will consider sustainable travel issues.

Placemaking will play an important role in delivering the aspirations of the strategy in new developments. Not only in terms of creating safe routes and streets are that are designed to encourage walking and

cycling over the use of the private car also through the provision of the necessary infrastructure to encourage behavioural change. These aspects are all required to deliver walkable 20-minute neighbourhoods.

As with the with the placemaking principles of PP1, this key element has been built into existing masterplans such as Findrassie, Elgin South, and the Elgin City Centre masterplan. Any tailored approach to placemaking that is considered will need to continue to support this strategy and be embedded within it.

Moray Council Open Space Strategy

The Moray Council's Open Space Strategy was prepared in 2018 and provides a strategic vision for the provision, development, maintenance and management of open space within Moray. High quality open space is a fundamental element of good placemaking and can help to create places with character, identity and sense of place contributing to quality of life. Open space can also ensure new development fits into the natural environment and landscape.

The strategy provides a detailed audit of open space in seven settlements in Moray and influenced what types of open space were required on new sites in the MLDP 2020. It will also be important to create places and open spaces that are inclusive and accessible for all users. The updated Open Space Strategy will play a key role in providing the evidence base for delivering high quality multi-functional open space in the MLDP 2027. Should tailored approach for open space be included in the MLDP 2027 then this will be required to be reflected in the placemaking local policy and the QA.

The Public Health Scotland Strategic Plan 2022 – 2023

This strategy sets out objectives to improve the nation's health and placemaking and the place-based approach to planning will play a key role in delivering these desired outcomes. PP1 recognises the benefits that placemaking can have on the populations health and was influenced by the Mood, Mobility and Place project. Given the importance that placemaking will place in delivering these key outcomes, improving the physical and mental well-being of the population will continue to be embedded into the MLDP 2027 and any tailored approach to placemaking that could be considered.

Moray Council Climate Change Strategy

Climate Change Strategy which, together with the MLDP, is designed to provide a co-ordinated and appropriate response to help all with Moray to deal with the challenges that climate change is expected to bring. On the 27 June 2019, Moray Council declared a Climate Change Emergency. It was agreed that a Climate Change Strategy and action plan would be prepared and adopted with the aim of Moray Council becoming carbon neutral by 2030. Further that the Council would work with the wider community to promote and facilitate local action on Climate Change.

NPF4 places tackling the Climate Emergency at the forefront and the planning system and good placemaking will play an important role in addressing this issue to build sustainable and resilient communities. Placemaking can help tackle some of these issue by creating communities that encourage healthy lifestyles by providing good active travel networks, supporting and enhancing biodiversity, and creating successful mixed-use neighbourhoods to reduce car dependency. Delivering these outcomes will be incorporated into the MLDP 2027 and any tailored approach to placemaking that could be considered.

Moray Council Biodiversity Duty Report 2021 – 2023

In addition to tackling the Climate Emergency, NPF4 and Moray Council also recognise the importance of tackling the nature crisis through both NPF4 and the MLDP which both contain policies to protect and enhance biodiversity. The Council is undertaking a range of work to embed the urgency of reversing

biodiversity loss and restoring nature and the next MLDP will facilitate the creation and conservation of a Nature Network to support connectivity between protected areas and between urban-rural areas.

The MLDP 2020 Placemaking Policy PP1 already acknowledged the importance of supporting and enhancing biodiversity and had its own individual policy and section within PP1. This work is currently ongoing and the next MLDP any tailored approach to Placemaking will need to take cognisance of this work to deliver these key policy outcomes. A separate schedule has been prepared covering the next LDP will address key issues relating to biodiversity.

Summary of Stakeholder Engagement

NHS Grampian

Moray Council Senior Engineer (Transportation) – Comments received have been included within the schedule.

Lead Public Health Officer – Moray Council Environmental Health - Comments received have been included within the schedule.

Moray Council Flood Risk Management Team – agreed the summary of evidence.

NatureScot- Suggested adding Designing Streets to the evidence. Moray Council considers this to be policy context rather than evidence.

SEPA – No comments but note the links to Schedule 2 Biodiversity, Natural Places, Green and Blue Infrastructure.

Summary of Implications for the Proposed Plan

Based on the evidence and local knowledge accumulated over the previous two plan periods the proposed plan will:
- Consider preparing a tailored approach to Placemaking and the QA to deliver the policy outcomes and policy aspiration of NPF4.
- Update placemaking guidance in line with any tailored approach.
- The new LDP should consider place-based opportunities for new development sites and incorporate outcomes from other strategies and evidence to support the Local Living principle. This should include early engagement with communities and key stakeholders.
- Consider key design principles and/or development briefs on key sites to support a tailored approach.
- Consider future masterplan requirements for longer term growth areas.
- The new LDP should create places and spaces that are inclusive, are accessible for all, and are safe by being designed to reduce antisocial behaviour. Early engagement with communities and key stakeholders will inform this approach.

Statements of Agreement

Nature Scot suggested adding Designing Streets to the evidence. Moray Council considers this to be policy context rather than evidence.

Statements of Dispute
None identified.

Issue: Topic / Place	7. Local living and 20-minute neighbourhoods
Information required by the Act regarding the issue addressed in this section	Section 15(5) • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district. Section 15(2A) • a statement of the planning authority's policies and proposals as to the provision of public conveniences. Section 15(2B) • a statement of the planning authority's policies and proposals as to the provision of water refill locations.
Links to Evidence	**CD079** Scottish Government - Local Living and 20 Minute Neighbourhood - draft planning guidance **CD080** Climate Exchange - 20-minute neighbourhoods in a Scottish context **CD081** Our Place - 20 Minute Neighbourhoods (website) **CD082** HITRANS SUSTRANS - 20 Minute Neighbourhoods in the Highlands and Islands **CD078** Moray Council Active Travel Strategy 2022 - 2027 **CD076** Transport Scotland - Reducing car use for a healthier, fairer and greener Scotland - A route map to achieve a 20 per cent reduction in car kilometres by 2030 **CD083** Bilbohall Strategic Masterplan **CD084** Buckie South Masterplan **CD085** Dallas Dhu Masterplan **CD086** Elgin South Masterplan **CD087** Findrassie Masterplan **CD088** Elgin City Centre Masterplan 2021 **CD089** Aberlour Town Centre Improvement Plan – 2022 **CD090** Buckie Town Centre Improvement Plan – 2022 **CD091** Dufftown Town Centre Improvement Plan – 2022 **CD092** Forres Town Centre Improvement Plan – 2022 **CD093** Keith Town Centre Improvement Plan – 2022 **CD094** Lossiemouth Town Centre Improvement Plan – 2022 Moray Council Schedules – evidence is referenced throughout this schedule that links to other schedules.

National Planning Framework 4 (NPF4) Context

NPF4 includes a specific policy on Local Living and 20-minute neighbourhoods, although it is recognised that this is a cross cutting policy, and a number of other areas will contribute to this policy requirement.

The policy aims to 'To encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options'.

This is further qualified; 'LDPs should support local living, including 20-minute neighbourhoods within settlements, through the spatial strategy, associated site briefs and masterplans. The approach should take into account the local context, consider the varying settlement patterns and reflect the particular characteristics and challenges faced by each place. Communities and businesses will have an important role to play in informing this, helping to strengthen local living through their engagement with the planning system.'

Policy 15 also provides a list of criteria that should be considered when determining planning proposals. This suggests elements to consider to ensure that proposal will contribute to local living. This includes local access, but is not limited to;

- sustainable modes of transport including local public transport and safe, high-quality walking, wheeling and cycling networks;
- employment;
- shopping;
- health and social care facilities;
- childcare, schools and lifelong learning opportunities;
- playgrounds and informal play opportunities, parks, green streets and spaces, community gardens, opportunities for food growth and allotments, sport and recreation facilities;
- publicly accessible toilets;
- affordable and accessible housing options, ability to age in place and housing diversity.

The above criteria will provide a framework to explore Local Living and through mapping, a methodology can be developed to deliver Local Living across Moray.

Summary of Evidence

Introduction

Local living and 20-minute neighbourhoods represent a positive step towards creating liveable and sustainable communities including improvements to health and wellbeing, reducing inequalities and adapting to climate changes. Furthermore, by reducing the need for people to drive and providing services within a walkable catchment, this promotes physical activity, contributing to improved health and a healthier environment overall.

The Scottish Government draft Planning Guidance on Local Living and 20 Minute Neighbourhoods states that 'The Local Living and 20 minute neighbourhood concepts aim to create places where people can meet the majority of their daily needs within a reasonable distance of their home, by walking, wheeling or cycling'. This further outlines the benefits of this approach by highlighting the positive effect on the climate and the environment, health and wellbeing, the local economy and quality of life.

The draft Planning Guidance sets out a Framework with 14 key themes in order to fully consider all the key elements of Local Living;
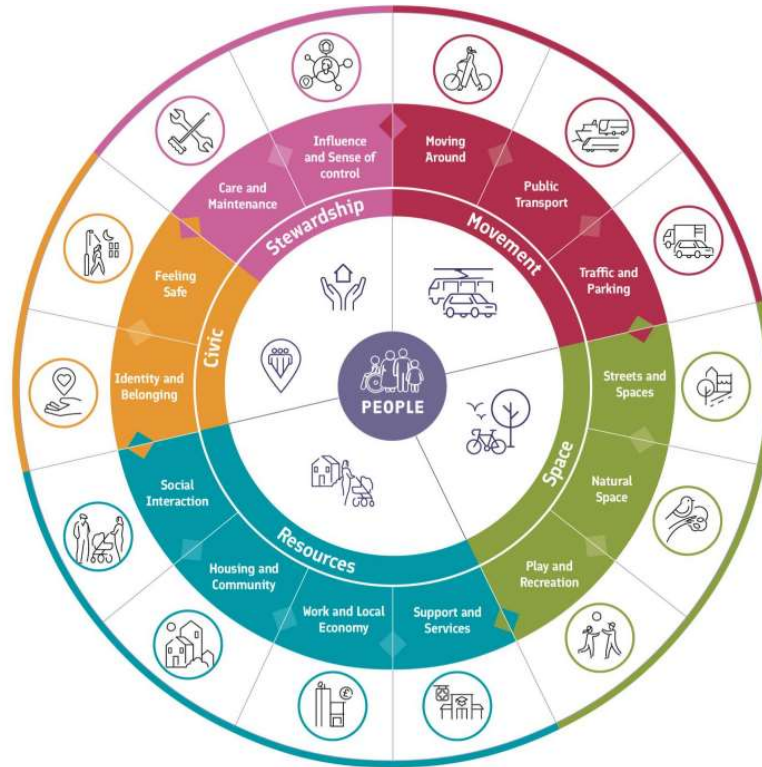
Developing a local living methodology for Moray involves creating a sustainable and community-focused approach to living that considers the unique challenges and opportunities of urban and rural areas. The successful delivery of local living across Moray cuts across a number of policy areas, with the local living principal drawing all of these elements together. Evidence has been gathered through several corresponding schedules, and this information and outcomes will form the basis of the Moray local living approach.

The concept of local living and 20-minute neighbourhoods is not limited to urban areas, and it can also be applied to rural communities. Rural communities can benefit 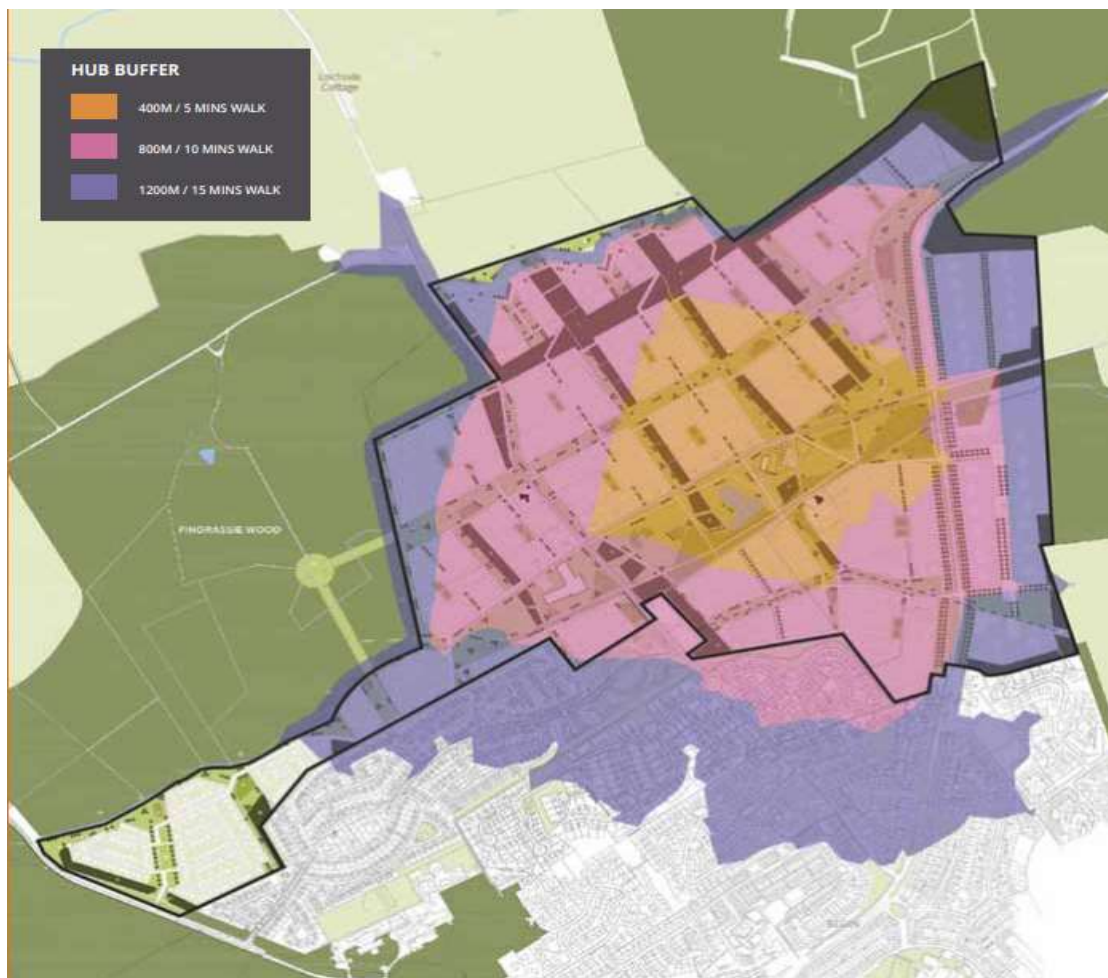greatly from this concept by creating more sustainable and liveable communities that meet the needs of their residents. However, it is likely that local living needs to adapt to rural areas within Moray due to the existing settlement patterns and the need to resource share.

The approach to Local Living will vary across Moray as there is a mix of communities, across both urban and rural areas. It is recognised that a largely rural area like Moray will be looking towards Local Living as a collective rather than 20-minute neighbourhoods. However, there will be places that the concept of 20-minute neighbourhoods can be delivered, for example in existing settlements or new larger developments. Therefore, a variable approach will be required to deliver Local Living, for example looking holistically at rural settlements and the need to cluster services. This approach will allow for gaps to be identified regarding service provision to meet Local Living key requirements.

There are already several existing examples of Local Living areas across moray. Adopted masterplans, including Elgin, Forres and Buckie include visions for more pedestrian-friendly and sustainable communities, that are designed around the needs of people, rather than cars. This includes the development of more cycle and pedestrian-friendly infrastructure, the promotion of public transport, and the creation of mixed-use developments that include housing, retail, and community services. New larger developments will include integrated services and other facilities and may also include links to existing services in the surrounding areas. One example of linking new development to existing services is the delivery of new sustainable travel routes, this is often delivered by the appropriate developer. Larger scale projects, that may involve multiple developers could be delivered through the gathering of developer contributions.

This approach will also allow us to identify gaps in existing neighbourhoods and ensure people can access their daily needs in their local communities. These gaps will be identified through mapping existing services and facilities and identify what is the most appropriate mechanisms to address these. The mapping will address both new developments and existing neighbourhoods. This will need to take different approaches depending on the settlement or rural area.

In addition to the town centres, new developments in settlements have also been working to promote and create 20-minute neighbourhoods in new residential areas. For example, Elgin has developed to the north and south, and this has promoted Local Living, aiming to transform new developments into a more vibrant and connected communities by improving public spaces, embedding community services, and enhancing pedestrian and cycling infrastructure. This has also been reflected in new development in Forres and Buckie. The local living concept has been integrated into new developments across a number of settlements and this is evidenced through adopted masterplans and development briefs. An example of this approach within Moray is the Findrassie Masterplan, which contains details on Local Living within a new, large-scale development. The following plans show three examples of community facilities: community hub, school and shops, and the walking distance from these hubs. It is also recognised in these plans that new facilities can also serve existing residential areas as well. This model can be replicated across other towns in Moray with a tailored approach for individual settlements.

SCHOOL BUFFER
- 400M / 5 MINS WALK
- 800M / 10 MINS WALK
- 1200M / 15 MINS WALK

SHOP BUFFER
- 400M / 5 MINS WALK
- 800M / 10 MINS WALK
- 1200M / 15 MINS WALK
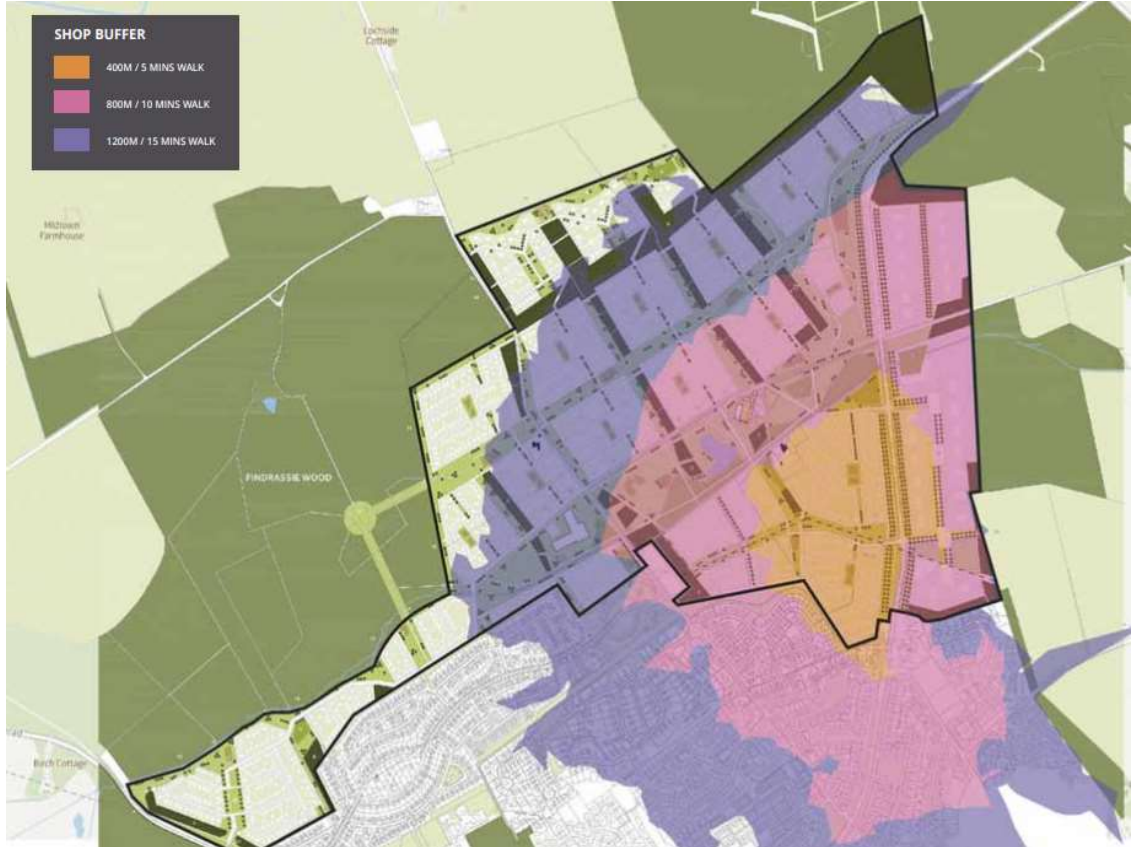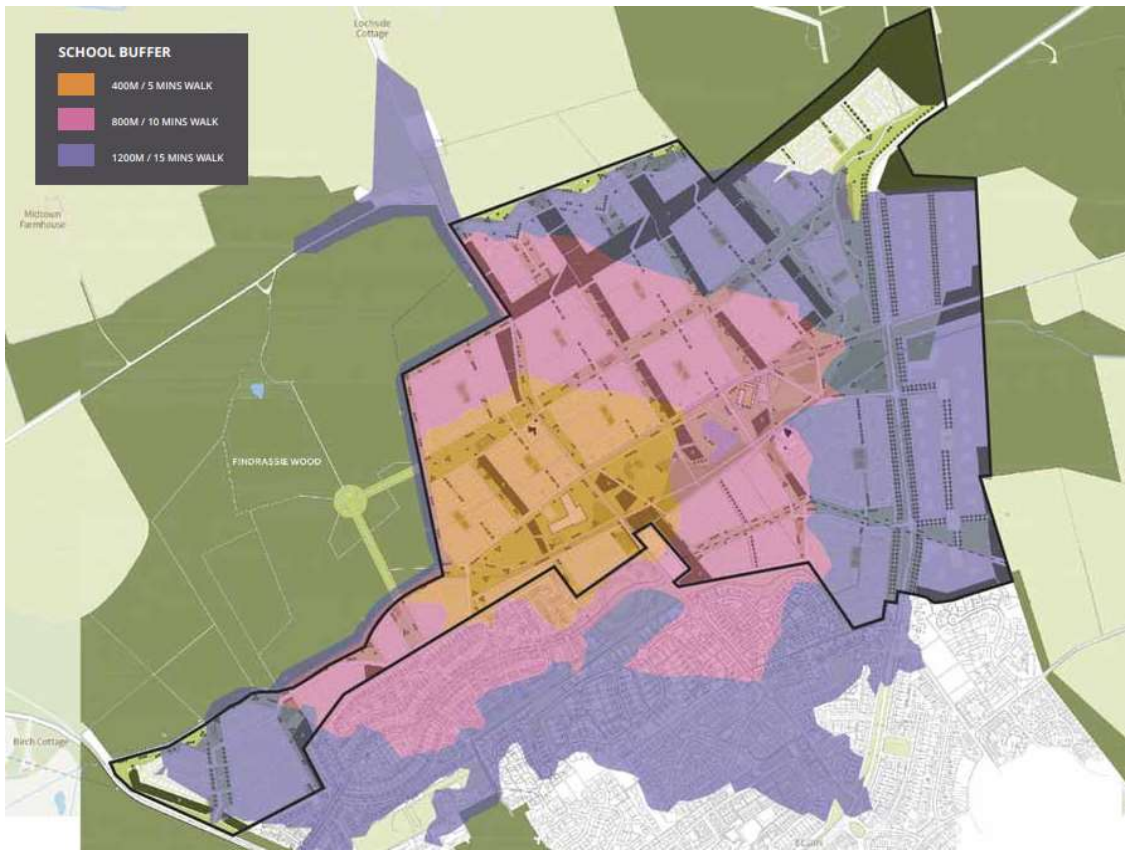
This approach has also been incorporated in Town Centre Improvement Plans for a number of settlements (Aberlour, Buckie, Dufftown, Forres, Keith, and Lossiemouth) across Moray. The Town

Centre Improvement Plans show a number of key projects that will aid in delivering Local Living; many of these plans are now being delivered and improvements are being developed to support Local Living.

Moray Council has been working to plan for new facilities within settlements through the possible acquisition of funding for a number of town centre projects. This includes the development of new facilities as well as the renovation of existing facilities to make them more accessible and welcoming. Overall, efforts to create Local Living neighbourhoods are a positive step towards creating a more sustainable and liveable community. By promoting sustainable travel, creating more accessible and connected neighbourhoods, and investing in community facilities, Moray is creating towns and rural areas that Is starting to deliver key elements of Local Living.

Rural areas in Moray are diverse and scattered communities that includes a mix of small towns and villages, as well as remote and sparsely populated areas. To create more sustainable and liveable communities in this area, a new approach, as discussed below, will need to be undertaken to encompass different groupings and wider areas. This may not meet the concept of 20-minute neighbourhoods but should meet the requirements of local living in a rural context. The report Living Well Locally - 20 Minute Communities in the Highlands and Islands, provides a number of good examples of how Local Living can be delivered across scattered rural communities. This approach would suit rural communities within Moray in terms of shared resources and services. The following is an example of Local Living across Foyers and Stratherrick, which has similar characteristics to areas of Moray;
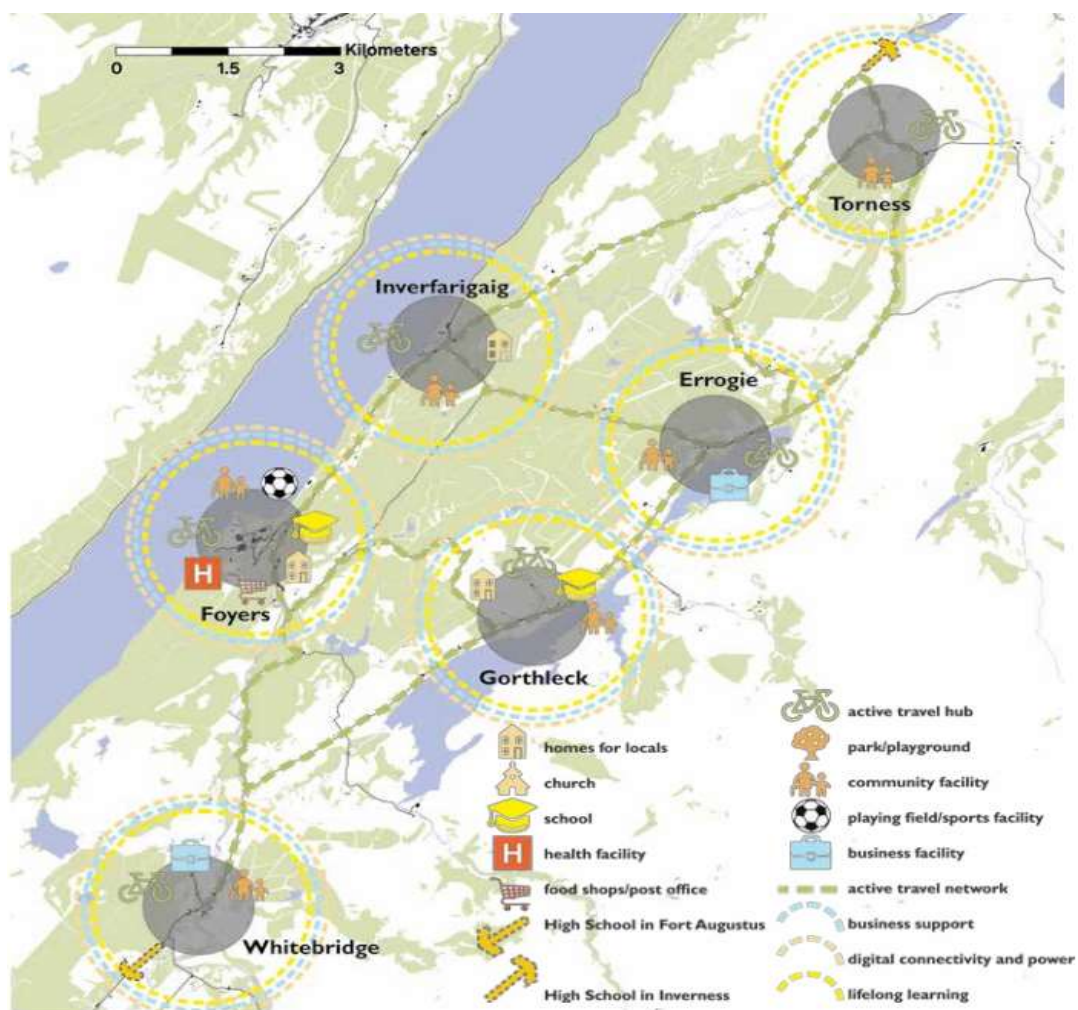
One of the main challenges facing Moray is the lack of public transport options. Within settlements there is considerable provision for walking and cycling and there are some existing inter settlement routes, however there is recognition that there are gaps in the network. To address this issue, the Moray Active Travel Strategy is continuing to develop more accessible and connected walking and cycling

routes, as well as the initiation of demand led transport, specifically m.connect in Moray, part of the Moray Growth Deal Project. There are also existing sustainable travel options through Moray Council School Transport Services. Furthermore, there are promoted programmes through Moray Councils Active Travel behaviour change initiatives that support active travel provision in rural areas. By improving these modes of transportation, residents of rural areas may be able to access essential services and amenities more easily and reduce their reliance on private vehicles.

In addition to transportation, Moray Council with community partners is also working to develop a more diverse and integrated mix of services and amenities within its communities, for example through various funding streams Moray Council is developing a number of projects with cross sector support. This includes the development of community facilities as well as the promotion of local businesses and services. By creating more accessible and integrated services and amenities, the rural areas can create more sustainable and liveable communities that meet the needs of its residents. Furthermore, this can help to create a stronger sense of community and social cohesion, as residents are able to connect more easily and engage in local initiatives.

In conclusion, the concept of local living is not limited to urban areas, and it can be applied to rural communities as well, although noting that specific solutions are required. By improving transportation options and developing more integrated services, including digital connections, and amenities, Moray communities can create more sustainable and liveable communities that meet the needs of their residents.

The Moray Approach

Creating local living neighbourhoods in Moray, and therefore addressing the policy requirements in NPF4 will require a new approach with an increased emphasis on accessibility, sustainability, and inclusivity. The approach encompasses a multi-faceted strategy, addressing infrastructure, climate change and adaptation, mixed developments, green spaces, public transportation, and community engagement to create a holistic and resilient urban environment going forward.

It is worth noting that there is significant crossover with Schedule 6 Placemaking and Schedule 11 Infrastructure. Both schedules contain significant evidence to deliver the local living approach detailed below. As discussed below many of the key elements of local living are an amalgamation of other policy areas.

The key principles and how this could be delivered in Moray is as follows;

1. **Community Engagement:**
   - Involve residents, community groups, and stakeholders in the planning process. Significant information from community groups and stakeholders has already been gathered, through dedicated public events, schools' engagement (Elgin Academy, Speyside High and Seafield Primary School) and will input to the process of developing the next Local Development Plan. A number of local communities are already drafting local place plans to feed into the local development plan process. Furthermore, additional opportunities will be presented to communities through the preparation of the forthcoming Local Development Plan, the continued development of Local Place Plans, and the identification of land use planning issues contained within Community Plans to align with the Local Development Plan. There will be further public consultation events and consultation with the community councils and other groups through the LDP process. The timeline for this has not been established, however the Development Plan Scheme gives an overview of the consultation periods.

2. **Local Economy:**
   - Provide opportunities for economic development and support small businesses to strengthen the local economy through a collaborative approach with stakeholders, for example Business Gateway and Highlands and Islands Enterprise.

- Ensure that there is sufficient employment land allocated within the Local Development Plan to allow business to thrive in the right places.
- Allow a flexible approach to mixed used sites to ensure opportunities are available for local business.
- Schedule 13 Business and Industry and Schedule 14 Town Centres and Retail provides evidence of the existing situation across Moray. These provide specific evidence on settlements across Moray, including data on existing patterns, town centre health checks, strategies regarding town centre improvements. This data will be used to direct retail and business development opportunities through land allocations to support Local Living opportunities in the forthcoming LDP.
- Furthermore, the Community Wealth Building Strategy will ensure that economic activity is retained within the Moray area, when appropriate.

3. **Education and Skills Development:**
   - Invest in education and skills training, through partnership working, to provide residents with the tools they need to support business development and retention of skills in Moray. This will be delivered through cross sector working with the wider educational sector including Moray Council Education and the further/higher education sector i.e. UHI.
   - Moray Council will help to enhance local economies through the delivery of the Community Wealth Building Strategy and ensuring that employment and businesses are provided opportunities in the right places to support development.
   - Schedule 10 Infrastructure provides evidence of education and learning including school education and further education. The evidence, represented through mapping, has established existing education provision within settlements and the need for future support through development. This information has been informed, amongst other items, by Moray Council Learning Estate Strategy 2022-32, Moray Council Housing Land Audit, Moray Council School Roll Forecasts 2022. This data will be used to support schools through residential allocations in appropriate communities.

4. **Housing and Infrastructure:**
   - Ensure the availability of housing including affordable and accessible housing in the right place to support settlements.
   - Allocate housing sites across Moray to ensure settlements and services can be supported and people have choice including affordability at all levels.
   - Invest in infrastructure to ensure local living can be a success including active travel links, digital connectivity.
   - The Moray Local Development Plan will provide a range of housing sites including the integration of affordable options. There are a number of schedules that provide specific details on this – Schedule 8 Housing Land and Specialist Housing; and Schedule 10 Infrastructure. The evidence, represented through mapping, has established existing development sites including housing and identified infrastructure requirements within settlements and the need for future development. This information has been informed by plans by Moray Housing Land Audit the LDP Delivery Group. Housing and infrastructure are key requirements of local living and the delivery of both will be fundamental to achieving the aims of local living. This data will be used to develop new communities and promote housing and infrastructure to support existing communities through allocations in the forthcoming LDP.

5. **Healthcare and Social Services:**

- Secure access to healthcare facilities and related services within community settings, where possible, through cross sector working with NHS Grampian.
- Work with healthcare providers to allow for the development of flexible health services and mobile healthcare by providing community spaces for service delivery. These multifunctional spaces could accommodate a variety of community uses and span a number of settlements. In Moray this will be recognised by enabling people to access services within their locality.
- Schedule 10 Infrastructure contains significant evidence on Healthcare provision across Moray. The evidence, represented through mapping, has established existing health provision within settlements and the need for future development. This information has been informed by plans by NHS Grampian and Moray HSCP. As noted, the rural settlements and areas with Moray may require to adopt shared services, this is pertinent in this element of local living. In order to address this issue, further exploration of sustainable transport links between residents and shared services may be required.
- The data will be used to assess gaps in provision and plan accordingly and/or examine possible connections to allow suitable access to health services.

6. **Environmental Enhancement:**
   - Promote responsible land use, conservation, and access to open space and play opportunities. Improve openspace and play provision within settlements and ensure that these areas are appropriately located and accessible. Any gaps in provision, highlighted in the Open Space Strategy and Play Sufficiency Assessment should be addressed through improvement opportunities.
   - Environmental enhancements, including improvements in greenspace, spanning rural and urban area will address a number of key issues, including climate change mitigation and adaptation, biodiversity loss, flooding. The development of a Moray wide Nature Network will provide the basis for strategic environmental improvements.
   - Further detail is included in other schedules that directly address a number of these issues – Schedule 1 Climate Change; Schedule 2 Biodiversity, Natural Spaces & Blue and Green Infrastructure; and Schedule 3 Forestry, Woodland & Trees. The evidence, represented through mapping, has established existing environmental designations, open spaces, play sufficiency within settlements and across Moray. This will also highlight gaps in provision and the need for future development. This information has been informed by the Moray Biodiversity Study, Open Space Audit and the Play Sufficiency Audit.

7. **Transportation and Connectivity:**
   - Improve rural transportation networks, including public transport and walking and cycling opportunities.
   - Continued provision of behaviour change programmes including training on cycle use.
   - Recognise the need for the continued use of private vehicles in some communities.
   - Identifying sustainable travel links through settlements and creating opportunities to link resources within rural areas, while recognising the constraints of delivery of inter settlement routes. This will allow for non-motorised travel to enable access to daily needs, while also recognising the need to provide for parking provision within settlements.
   - The delivery of services should be supported by improved public transport and the development of demand led transport, including integration of M.connect with services.
   - Within Moray this should enable people to use alternative modes of transport and reduce the need to rely on private vehicles.

- Schedule 10 Transport includes empirical evidence on existing transport movements including public usage, active travel, specific settlement patterns, and infrastructure condition. The evidence, represented through mapping, has established existing transportation and connectivity provision within settlements and the wider area and the provision for future transport development. For example, this information has been informed by Moray Council Active Travel Strategy 2022 to 2027.

8. **Social Inclusion and Wellbeing:**
   - Address social isolation and promote community well-being by establishing community 'centres' and support services. This will be led by community groups with support from Moray Council. Continued working with Moray Council Community Support Unit will ensure the right mechanism are used to aid social inclusion and wellbeing, recognising the current and future constraints on service delivery.
   - As noted, a number of community initiatives are being developed to support the local development plan including Local Place Plans. The approach of Place Based planning should ensure increased partnership working between community groups, business and agencies to address provision delivery and additional support services, including funding. This should include support for communities where there is higher evidence of inequality.

9. **Local Governance and Decision-Making:**
   - Empower local decision-making bodies to address community needs effectively with support from Moray Council, when required. Encourage transparency, accountability, and resident participation in governance through stewardship and community support. This is being addressed through the development of Local Plan Plans and community plans. Furthermore, community engagement and input through the local development plan process and other strategies will ensure community participation.

10. **Collaboration and Networking:**
    - Foster partnerships with neighbouring rural communities and urban areas to share resources. Moray is a diverse area and will require improved collaboration and networking between settlements and rural areas to deliver effective 20 min communities and local living. A number of rural settlements will require to collaborate and share services and improve linkages to these services in order to benefit from this approach. There are a number of good examples of dispersed rural communities that share resources contained within the 20 Minute Neighbourhoods in the Highlands and Islands report. This will provide a framework to examine shared services across Moray and create clusters that can adopt the local living principle. Furthermore, the place-based approach requires a holistic approach to the delivery of local living, through partnership working with funding bodies and delivery partners.

11. **Monitoring and Evaluation:**
    - Establish metrics and benchmarks to measure the success of the local living methodology. Regularly assess and adapt strategies based on feedback and outcomes. Review mechanisms will need to be explored and developed to ensure the approach to local living is flexible an adaptable for future needs.

In conclusion, the approach to local living in Moray is a culmination of a range of policy areas that need to combine in an effective manner to deliver local living across a diverse range of settlements and rural areas. By focusing on combining these policy areas, for example enhancing infrastructure, promoting mixed-use developments, integrating green spaces, prioritising public transportation, and fostering community engagement, Moray can deliver and meet the policy requirements contained within NPF4.

Outcome

The development plan should encompass the Place Principle to ensure the specific characteristics, needs, and opportunities of a particular location or community are met and can be delivered through partnership working. This will require cross sector working with community groups, statutory bodies and private businesses, for example. This approach acknowledges the uniqueness of each place across Moray and seeks to tailor development and policy to the specific context, history, and aspirations of that area. Place-based planning supports collaboration with local stakeholders, community engagement, and the integration of social, economic, and environmental considerations.

To explore the Local Living approach Moray Council will use a Housing Market Area as an pilot area and test the local living approach using the evidence gathered to date. This will allow every element – for example, local economy, education and skills development, housing, infrastructure, healthcare, access to the environment and open spaces, transport and connectivity, and social elements, for example social inclusion, wellbeing, and local decision making - to be scrutinised and alter the methodology to suit. This will also allow linkages to be created between other parties, for example relating to economic development, community bodies etc. Furthermore, testing the methodology will highlight gaps in information and resources and allow the council to monitor and evaluate the process.

The collected evidence will provide a basis for decision making for the development plan, translating this into tangible actions can be achieved through place-based planning. There is an opportunity to use the local living concept as the basis for developing the Place Principle for settlements and wider rural areas, this should be wider than planning and also encompass economic development and funding opportunities.

The collected evidence will be used to aid in site selection for the forthcoming local development plan, ensuring the 20-minute approach and local living is embedded within the decision-making process.

It is recognised that delivering the key elements of Local Living will pose a number of challenges, including funding and resourcing of services and facilities. Many of these decisions will be taken by partner organisations who may have differing priorities and therefore elements of Local Living may be difficult to deliver. Likewise, limited council resources and financial constraints may prevent full-service delivery in recognised Local Living communities. Furthermore, the choices made by businesses and other service providers will dictate where these are located and therefore may not always meet the needs of the Local Living community.

Summary of Stakeholder Engagement

Comments were received and have been addressed in the revised schedule from the following groups:
- Moray Council Transportation
- Moray Council Community Support Unit
- Moray Council Sports and Cultural Services
- Moray Council Education
- Moray Council Open Spaces

Comments were received and have been addressed in the Statement of Agreement from the following group; NHS Grampian.

Summary of Implications for the Proposed Plan

- Impact on the spatial strategy due to allocation of land and promotion of brownfield sites to meet the requirements of local living.
- Criteria for development site selection to include assessment of active travel infrastructure to ensure that infrastructure is available or can be provided to provide access by walking, wheeling and cycling. Site selection process to also consider opportunities to access public transport services.
- Integration of the Core Path Plan to aid delivery of improved sustainable routes to address local living requirements e.g. upgrading to surfacing etc.

- Appropriate local employment opportunities to reduce commuting trips and supporting local economic development.
- Local retail opportunities to support business and communities.
- Examine health facilities to ensure they are located in accessible places or sustainable transport are in place to access these services.
- Provide opportunities for appropriate educational facilities including childcare opportunities, embed within communities.
- Provide opportunities for community indoor space.
- Enhance the varied opportunities for greenspace development including open space, play opportunities, biodiversity improvements, food growing etc.
- Provide and plan for housing options to allow for mixed communities.
- Increased use of masterplans and design briefs to ensure developments are following the Local Living principle.

Statements of Agreement

NHS Grampian

Agreed, subject to:

- The approach of 'Local Living' for the more rural Moray area and 20-minute neighbourhoods in existing settlements and new larger developments would be welcomed.

Under 5 Healthcare and Social services:

- NHSG do have some concerns, e.g. development of 'flexible health services and mobile healthcare by providing community spaces for service delivery'. NHS Grampian like many NHS boards currently faces significant financial challenges which impacts on NHSG's ability to rent, purchase or develop new facilities as well as increase capacity at existing premises. There are also challenges with staffing particularly in more rural areas. Use of technology such as 'near me consulting' has been one way that NHSG has been looking to enable some types of consultation to take place virtually from patients' homes.

- The focus for NHS Grampian continues to be addressing capacity at existing premises. NHS Grampian, along with Health and social Care Moray (HSCM) would prioritise creation of additional capacity at existing premises through reconfiguration or extension. NHSG and HSCM continue to work together on strategic premises planning. The HSCM inform NSHG how they plan to deliver primary care services across Moray, and this informs future premises planning.

Council response: Moray Council is aware of the current priorities of NHSG and we will continue to work with NHSG to ensure that the best approach to local living can be delivered through the preparation of the LDP.

Statements of Dispute

None identified.

Issue: Topic / Place	8a. Quality Homes- Housing Land Supply
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • section 15(1A) The local development plan must also include targets for meeting the housing needs of people living in the part of the district to which it relates.
Links to Evidence	**CD095** Moray Housing Need and Demand Assessment - 2023 **CD096** National Planning Framework 4 and MATHLR figure **CD097** Moray Council Housing Land Audit 2023 **CD001** Moray Local Development Plan 2020 - Volume 1 - Policies **CD028** Moray Local Development Plan Monitoring Report 2023 **CD098** 'Brownfield Sites' – Report to Planning and Regulatory Services Committee on 1 March 2022 and Appendix 1 **CD099** 'Brownfield Sites' – Report to Planning and Regulatory Services Committee on 25 October 2022 **CD100** Moray Council Urban Capacity Studies 2023 **CD101** Moray Council Self Build Register Feb 2024

National Planning Framework 4 context

Local Development Plans are required to identify a Local Housing Land Requirement for the area they cover to meet the duty for a housing target and to represent how much land is required. NPF4 encourages an ambitious and plan-led approach with the aim that the Local Housing Land Requirement is expected to exceed the 10 year Minimum All Tenure Housing Land Requirement (MATHLR) set out in Annex E of NPF4.

Deliverable land should be allocated to meet the 10-year Local Housing Land Requirement in locations that create quality places for people to live. Areas that may be suitable for new homes beyond 10 years are also to be identified. The location of where new homes are allocated should be consistent with local living including, where relevant, 20 minute neighbourhoods and an infrastructure first approach. In rural and island areas, authorities are encouraged to set out tailored approaches to housing which reflect locally specific market circumstances and delivery approaches.

LDPs should provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive in identifying opportunities to support residential development.

LDPs should set out opportunities for the sustainable reuse of brownfield land including vacant and derelict land and empty buildings.

Summary of Evidence

Strategic Housing Land Requirements- Housing Need and Demand Assessment 2023

Planning authorities must take the figures set out in NPF4 (page 143), known as the Minimum All Tenure Housing Land Requirement (MATHLR) into account when arriving at their indicative housing land requirement. The MATHLR is **the minimum** amount of land for housing to be included within LDP's and the local housing land requirement should exceed the MATHLR. NPF4 sets the MATHLR as **3450 units** for Moray.

The MATHLR is evidence based, combining past development rates with future projections and policy ambitions. However, the local development planning guidance (p63) states that where more recent evidence is available this should be used as it enables the Evidence Report to be more up to

date. The Moray Housing Need and Demand Assessment 2023 has been signed off by the Scottish Government Centre for Housing Market Analysis as being "robust and credible".

The NPF4 figure for Moray of 3,450 for a 10-year period, when looking at a 20-year period could be assumed to be double at 6,900 units. This figure reflects levels of house completions in Moray which have averaged 363 units over the last 5 years.

For comparison purposes, in the Moray Local Development Plan 2020 (Volume 1), the Council identified a housing land requirement of 7049 units for a 20-year period. This provides a sensitivity check on the MATHLR figure.

Demographic context
- **Population:** The population of Moray grew by 11% between 2001 and 2021 compared with 8% growth across Scotland. Moray's population growth is projected to reverse between 2018 and 2043 with a decline in population of just under -3%, compared to a projected increase in the national population over the same period of 2.5%. However, such projections need to be treated with some caution as Moray's population in 2006 was projected to be less than 80,000 in 2018 and Moray's population growth can be attributed to a number of factors, including planning for positive growth.

- **Households:** National Records of Scotland (NRS) estimate that the number of households living in Moray will increase by 5% between 2022 and 2042 using a Principal Household Projection. This compares to a projected 7% growth across Scotland and is significantly less than household growth achieved in Moray between 2011 and 2021 (9%).

- **Ageing population:** The number of 75+ year old head of households in Moray will grow by 84% by 2043 whilst every other age range will decrease. Single Person and 2 Adult households will be subject to the greatest growth levels in Moray with 17% and 11% projected between 2018-38 respectively. Housing delivery plans will therefore need to be aligned to an ageing and smaller household profile.

Housing Need and Demand Assessment 2023

The graphic below summarises the outcomes of the HNDA.

Existing housing need is calculated from:
- Homeless households and those in insecure tenures
- Concealed (when one or more families in addition to the primary family are present in the home) and overcrowded households.
- Households who require specialist housing
- Households in below tolerable standards

Existing need is added to new housing need projected to arise which use baseline household statistics from 2022 and apply a 5% and 6% migration growth scenario. This is calculated as falling within the range of 2,258 and 2,815 with a higher growth scenario of 4,569, representing 10% also considered.

Stakeholders were consulted on 3 scenarios above (HNDA page 53), with the Moray Housing Market Partnership concluding that scenarios 2 and 3 (4,975 and 6730) were the preferred options upon which to create a range of housing estimates across the area. There was overwhelming stakeholder consensus that the growth scenario (6,730) should be used as a starting point for future housing delivery and land use planning within the new Local Housing Strategy and next Local Development Plan. Following validation, stakeholders were assured that there is robust local evidence to support the use of the growth scenario aligned to the ambitious economic development strategy associated with the Moray Growth Deal and overall approach in Moray to economic growth.

Therefore, the Moray HNDA all tenure housing estimates range from 4418 to 6730 over the next 20 years. The table below extracted from the HNDA (page 54) sets out the 20-year HNDA projections in 5-year bandings.

All tenure housing estimates	2022-2026	2027-2031	2032-2036	2037-2041	Total	Difference to Default	% Difference to Default
Default	1,021	508	499	400	2,428		~
Scenario 1 - Principal	3,011	508	499	400	4,418	1,990	82%
Scenario 2 - High Migration	3,100	646	653	576	4,975	2,547	105%
Scenario 3 - Growth 0.25%	3,568	1,080	1,084	998	6,730	4,302	177%

For the purposes of calculating the housing land requirement, the higher growth scenario, reflecting economic ambitions of the region, exceeds the MATHLR figure over the period to 2037. For the purposes of providing a generous housing land supply it is proposed to use the Growth scenario from the table above over the period 2022-2037 as a minimum to ensure a generous supply of land is identified over the local development plan period with an indication on longer term housing supply to meet demand, support master planning and an infrastructure first approach. The land supply will include LONG designations, an approach recognised through the Scottish Awards for Quality in Planning, and this will be managed proactively as has been the case since 2007. A local policy on LONG designations setting out the triggers for their release will be required.

The housing land supply requirements will be split according to the housing estimates by partner area identified on page 54 of the HNDA, which identifies:
- 54% of this global housing estimate should be met in the Elgin HMA
- 16% of this global housing estimate should be met in the Forres HMA
- 14% of this global housing estimate should be met in the Buckie HMA
- 8% of this global housing estimate should be met in the Keith HMA
- 7% of this global housing estimate should be met in the Speyside HMA
- 1% of this global housing estimate should be met in the Cairngorms National Park HMA.

Housing Land Audit 2023

The annual housing land audit provides details of the existing supply of housing land, split into 3 categories of:
- Established- the total housing land bank.
- Effective- sites available and expected to be developed within the 5-year period.
- Constrained- sites which are not anticipated to come forward within the 5-year period due to constraints such as ownership, infrastructure, flooding, viability or being designated as a LONG reserve of land.

Established land supply (p3)

	2019	2020	2021	2022	2023
Moray	12,387	12,751	12,346	12,192	11,770

Constrained land supply (p4)

Constraint	No. of units	No. of sites
Contamination	64	2
Marketability	483	18
Ownership	635	5
Physical	282	11
Programming	1,409	9
LONG	3,875	9
Total	**6,748**	**54**

Effective housing land supply (p5)

	2019	2020	2021	2022	2023
Moray	4,189	5,811	5,508	5,365	5,022

Windfall sites (p6)

	2017	2018	2019	2020	2021	2022
Windfall completions	56	38	16	22	47	14

Previous completions (p6)

	2018	2019	2020	2021	2022
Moray	358	414	231	398	418

Brownfield sites

NPF4 Policy 9 Brownfield, vacant and derelict land and empty buildings aims to encourage, promote, and facilitate the reuse of brownfield, vacant and derelict land and empty buildings and to help reduce the need for greenfield development. Currently around 4% of all housing completions in Moray are on brownfield land.

A report to the Council's Planning and Regulatory Services Committee on 1 March 2022 and followed up on 25 October 2022 identified the number of brownfield sites in Moray, assessing each longlisted site against a range of criteria to set out a prioritised short list of sites. The Council has several projects underway which are likely to address some of these sites and in doing so increase the number of residential units developed on brownfield land. This includes the Moray Growth Deal Housing Mix Delivery project which aims to support town centre regeneration as one of its investment objectives. The Council has also recently agreed use of external funding which has been secured to initiate a series of town centre grants which will also encourage residential opportunities in town centres.

With the emphasis placed on delivery within the planning system, it is important that the target set meets the right balance between ambitious, to bring about the change desired, and achievable given the need for staff resources, funding, partnerships and potentially property acquisition powers.

A target of 10% is proposed of housing completions over the next 10 years being completed on brownfield sites and a target of 5% is proposed of housing completions over the next 10 years within town centres. However, these targets are considered to be ambitious, and can only be achieved through additional funding being sourced to meet the additional costs and challenges of developing brownfield sites and current viability issues.

Capacity studies have also been undertaken by Council officers to review existing site capacities and potential new sites in addition to any further sites which may come forward through a Call for Sites process in advance of the Proposed Plan being progressed.

Summary of Stakeholder Engagement

- Local authority housing colleagues- Fiona Geddes, Housing Strategy and Development Manager
- Social housing providers- through the Housing Market Partnership through the HNDA
- Private housing providers- through Homes for Scotland north region Committee and through stakeholder workshops to develop the HNDA.
- Landowners- engaged through HNDA process.
- Public services- engaged through HNDA process.
- Representative bodies of housing providers and landowners- as above
- Gypsy Travellers and Travelling Showpeople- engaged through HNDA.
- Homes for Scotland- throughout HNDA process and annual HLA and through draft Evidence schedule

Details of how the Housing Market Partnership representatives and how they were engaged are set out on pages 14-15 of the HNDA.

Copies of this schedule were sent to:
- Fiona Geddes, Moray Council Housing Strategy and Development Manager
- Homes for Scotland

Summary of Implications for the Proposed Plan

Taking account of the MATHLR, HNDA and HLA, the proposed housing land requirement is:
MATHLR 10-year scenario 3450 units minimum
HNDA growth scenario projected 2022-2037- 5732 units.

Taking the HNDA Growth scenario, this means the new Local Development Plan should allocate sufficient land for 5732 units of housing from the baseline year of 2022 through to 2037 to provide a 10-year supply within the new Plan and areas of land that may be suitable for new homes beyond 10 years.

To calculate how much additional land requires to be zoned for housing, completions for 2022 and 2023 are deducted from the overall requirements, as well as the effective housing land supply deducted along with any other sites which are considered to be free of other constraints but, because of build out rates, they are more likely to be developed after 5 years. These figures are set out in the Council's annual housing land audit and are summarised in the table below.

LHMA	Housing Supply Target HNDA Growth scenario 15 year2 2022-2037 (A)	Completions 2022 and 2023 (B)	Housing land requirement 2024-2037 (A-B)	Existing effective 5-year supply at 2024(C)	Sites effective 5yr+ (D)	Additional housing land supply required (A-B-C-D) 2024-2037
Moray	**5732**	**418+464= 882**	**4850**	**5022**	**1409**	**0**
Buckie 14%			679	576	68	0
Elgin 54%			2619	2632	1227	0
Forres 16%			776	1360	98	0
Keith 8%			388	143	8	0
Speyside 7%			339.5	311	8	0
Cairngorms 1%			48.5	Not recorded in Moray HLA		

The table above identifies that the housing land requirement between 2024-2037 is 4850 units, taking account of completions recorded in 2022 and 2023. As there is an existing generous effective land supply and the effective 5 years plus supply, there is no need to identify additional land to meet need between 2024-2037.

However, there are a number of issues to consider in the new local development plan:
- There is an existing constrained supply of 5339 units, including over 3,875 units LONG reserve and it is proposed to retain LONG designations to ensure a pipeline of housing sites is available.
- Potential identification of additional brownfield land designations, referenced in the capacity studies.
- review of the indicative capacities of existing sites to reflect a significant increase in the number of smaller households and the need for single storey homes.
- replacement of any sites which are removed as allocations from the Plan and replaced with new sites.

- including small site allocations to meet local needs aligning with the spatial strategy.
- a review of empty homes in Moray and how these can best contribute to meeting need.

The above table will be updated to reflect any sites which are proposed to be deleted from the Plan.

There are estimated to be 2577 empty homes in Moray in March 2023, further flexibility is added by not including their potential contribution or the contribution from windfall sites into the housing land requirement calculation.

It is proposed to require further evidence and viability of sites as part of the ongoing plan preparation process. If sufficient evidence of both effectiveness and viability is not forthcoming, then sites will not be included, and existing designations may be deleted from the Plan.

Housing Targets
- *Annual housing completion target- HNDA Growth scenario – 440 units*
- *Additional housing land requirement (2024-2037 years)- 0 units*
- *Annual effective housing land supply target-500 units*

Statements of Agreement

Homes for Scotland (HfS)

HfS welcomes the overall aims of being ambitious, ensuring the local housing land requirement (LHLR) exceeds the 10 yr. MATHLR (which, it is acknowledged is a minimum rather than a maximum figure) and that the pipeline of land suitable for housing is deliverable up to and beyond 10 years.

HFS is concerned that the plan is not ambitious enough in terms of the indicative LHLR being suggested which results from the '23 HNDA, nor establishing how the pipeline land, especially the long-term land will become free of constraints and genuinely deliverable when required.

'The MATHLR is evidence based, combining past development rates with future projections and policy ambitions. However, the local development planning guidance (p63) states that where more recent evidence is available this should be used as it enables the Evidence Report to be more up to date.'

HFS provided a report by the Diffley Partnership/ Rettie & Co (2024) as evidence which needs to be considered reflecting the most up to date data. In line with the local development plan guidance, HfS state this more recent evidence should be used as it postdates the '23 HNDA which was prepared in 2022. See below regarding Areas of Dispute.

Council response - The Council's Housing Need and Demand Assessment has been signed off as robust and credible by the Scottish Government. Homes for Scotland were involved as key stakeholders within the Moray Housing Partnership in the preparation of the Assessment. The preparation of the work by Diffley Partnership/ Rettie & Co (2024) has not involved Moray Council. The report was not appended to the schedule submitted by HfS.

HfS are aware of the approach taken by Moray Council to manage the land supply, with the LONG policy and designation receiving national recognition. HfS are also aware that Moray Council maintains an up-to-date Housing Land Audit and has proactively released LONG land designations when policy triggers have been reached. The Council considers the response from HfS to be disappointing, lacking understanding of how the land supply has been managed over time.

Homes for Scotland

HFS noted they were unable to comment on the following evidence as links and details have not been provided in the Council's pro forma –

1. 'Brownfield Sites' – Report to Planning and Regulatory Services Committee on 1 March 2023 – no report attached.
2. 'Brownfield Sites' – Report to Planning and Regulatory Services Committee on 25 October 2022 – no report attached.
3. Moray Council Urban Capacity Studies 2023 (no link attached).
4. Council data relating to second homes, short term lets, empty homes and the vacant and derelict land register.

Links to the Moray Growth Deal Housing Mix Delivery project should be included as evidence together with details of any consultation responses received to the initial building blocks for the LHLR and Housing to 2040. The ambitions of the deal, to "retain and attract young people/families (16-29yrs) to live and work in the area".

The council need to ensure Brownfield sites that are to be identified or relied upon in the longer term as suitable housing sites are genuinely deliverable at this stage and not delay this.

The long-term land/ reserves should not be rolled forward because they always have been, as there needs to be clear evidence at this stage to show that any constraints can be overcome to ensure they can be delivered when required. This may include the need to consult now with statutory consultees (e.g. SEPA) to re-assess sites against new climate change and flooding requirements.

An understanding of the changing requirements of major local employers is needed to allow sufficient flexibility and uplift in the LHLR. For example, RAF Lossiemouth are currently buying up tracts of private family homes from housebuilders and offer support packages that will affect the local housing market. Additionally, the impact of neighbouring Freeport, which includes Ardersier, on those choosing to live in Moray must be considered fully.

Alongside a robust assessment of existing and proposed brownfield sites, the council should undertake a Call for Ideas exercise to ascertain what other land is, or could be, available for development and can contribute to a deliverable housing land supply over the duration of the emerging LDP. The suggestion that no new land will be allocated moving forward does not reflect ambitious growth and does not allow for new proposals to be considered.

Council response - The first two reports referenced are publicly available for HfS to access. The Moray Growth Deal and generally economic growth aspirations for Moray are clearly articulated in the Housing Need and Demand Assessment and were discussed and promoted by both Council officers and housebuilders in preparation of the Assessment. There is no need for further evidence on the Moray growth Deal given the aim to provide proportionate evidence and having already covered this issue through the Assessment.

In terms of Brownfield development, as HfS know, these are often long and complex sites to bring forward for development, however, NPF4 is quite clear on what it expects from the local development plan on this issue. To be genuinely deliverable at this stage is a site-specific issue outwith the scope of the Evidence Report. Bringing forward Brownfield sites can require significant investment, use of legal powers, working in partnership and staff resources, however the benefits are significant, supporting local living, reducing carbon and reducing demand for greenfield sites.

All sites, including LONG will be re-assessed and as stated if any sites are removed from the Plan then these will need to be replaced to ensure the housing land requirement is met. However, all sites have previously been through extensive consultation in order to be included within the Plan and any such changes are likely to be minimal.

Major local employers, including the RAF, were engaged throughout the HNDA and the wider growth opportunities are reflected in this.

The Council has already carried out a Call for Ideas to inform the Plan and will also be carrying out a Call for Sites to inform the Proposed Plan.

Statements of Dispute

Homes for Scotland (HfS)

Levels of existing housing need in Moray are more complex and much higher than is currently being accounted for through the HNDA tool.

The report commissioned by HFS by the Diffley Partnership and Rettie & Co highlights this and HFS welcomes a discussion with Moray Council to discuss this further. The latest research finds 9,100 households in Moray in some kind of housing need. The report concludes there are around 4,300 households in Moray in current need who will require an affordable housing option to meet their need. c.3,000 can afford a market housing option to meet their current need. The link between market and affordable housing is explored further in schedule 8b – Quality Homes – Affordable and Specialist Housing Requirements.

The evidence report should:
1. Recognise that new housing land allocations of scale can support existing local living and support/ help deliver new infrastructure.
2. The HNDA forecasts are based on post-recession data. If pre-recession data shows higher rates these should be used.
3. The predicted 'generous' housing target for '27-'36 falls below the MATHLR. Figures for '22-'26 should not be included towards achieving the MATHLR figure moving forward in the next LDP.
4. Reflect the latest evidence available in the attached Diffley Partnership/ Rettie & Co report.
5. The calculation of the LHLR needs to include the use of primary data for existing concealed and overcrowded homes. The HNDA tool defaults needs to be recalibrated and updated to take consideration of HFS's latest evidence so that the wider existing need is accurately identified. This should then inform the uplift expected to be applied to the MATHLR to define the LHLR and more accurately reflect existing need.

HFS feel the current indicative LHLR is insufficient to deliver ambitious housing growth, infrastructure together with the affordable and specialised housing needed in Moray over the next 10/20 years.

Council response - The Council disagrees with these comments. The HNDA has been subject to extensive stakeholder engagement and has been signed of as robust and credible by the Scottish Government. The Council has had no involvement in the Diffley Partnership/ Rettie & Co report which was only provided to the Council on 15 March 2024. The Council is satisfied that the growth scenarios plus the use of LONG designations will continue to ensure Moray enjoys a very generous supply of land for housing, as has been the case since 2007.

The Diffley Partnership/ Rettie & Co. report does not take account of the primary evidence in the HNDA or the comprehensive stakeholder engagement undertaken to develop the HNDA. The following high-level concerns regarding the HfS approach are highlighted:
- There is no information on representativeness of the data which is weighted by age and gender but the key element for HNDA is housing tenure.
- Broad categories of housing need are based on questions which are over simplistic in diagnosing need and there are no validation questions to gauge the level of response bias associated with a direct question.

- The major issue in the methodology relates to concealed households and not on existing households who have formed but are living "care of" with another household as a result of unmet housing need. Typically, concealed households are identified by defining if a household shares housing amenities with another household but does not share meals.
- The approach to the Council HNDA is more sophisticated than the HfS approach and is a more robust basis for informing future planning policy.

Issue: Topic / Place	8b) Quality Homes- Affordable and specialist housing requirements
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland)(Act) 1997, as amended, • section 15(1A) The local development plan must also include targets for meeting the housing needs of people living in the part of the district to which it relates. • Section 15(5)(cb) the availability of land in the district for housing including for older people and disabled people • Section 16(E) to prepare and maintain a list of anyone interested in acquiring land for self- build housing.
Links to Evidence	**CD095** Moray Housing Need and Demand Assessment - 2023 **CD102** Moray Council Strategic Housing Investment Plan 2023 **CD103** Moray Council Local Housing Strategy 2019-2024 **CD101** Moray Council Self-Build Register Feb 2024

National Planning Framework 4 (NPF4) Context

NPF4 requires Local development Plans to take account of diverse needs and delivery models across all areas, as well as allocating land to ensure provision of accommodation for Gypsy/Travellers and Travelling Showpeople where need is identified.

Summary of Evidence

Affordable housing

By tenure, across the Moray area, the HNDA (p53) estimates that:

- *53% – 58% of housing estimates should be met by social housing*
- *10% – 11% of housing estimates should be met by below market housing*
- *15% – 17% should be met by market rented housing*
- *17% – 19% should be met by market housing*

The Strategic Housing Investment Plan (SHIP) 2024/25 sets out the levels of affordable housing completions over the last 5 years (p2). Completions between 2019/20 and 2023/24 totalled 592 units, with no completions within the Speyside or Cairngorms Housing Market Areas.

Specialist housing

The HNDA (p57) identifies the contribution that specialist provision plays in enabling people to live well, with dignity and independently for as long as possible and identifies any gaps or shortfalls in that provision and he future level and type of provision.

Accessible and Wheelchair housing

Moray has a significant challenge with an ageing population, which is projected to continue with a 32% increase in those aged over 65 between 2022 and 2042. During this same period, negative growth is expected for those of working age with a -12% decline across Moray. These projections could impact on the sustainability of the Moray economy without positive measures and will necessitate housing, health and care interventions that enable the growing population of older people to live independently and well for as long as possible and identifies any gaps or shortfalls in that provision and the future level and type of provision.

As part of the HNDA evidence base, a calculation was carried out to provide estimates of the requirement for accessible housing in Moray over the next 5 years. The calculation used a combined measure of existing need and newly arising need to provide annual estimates. The outcomes are that

assuming that a 5-year projection period is used to meet the need for accessible market housing (201 units), when benchmarked against average annual market supply in Moray (149); it shows a net shortfall of 52 accessible units per annum.

Assuming that 5-year projections period is used to meet the need for accessible affordable housing (357 units), when benchmarked against projected annual SHIP completions in Moray as well as the turnover of existing stock (256), an overall shortfall of 101 units per annum is evident.

Housing estimates therefore suggest a need for 101 accessible affordable homes and 52 accessible market homes each year for the next 5 years.

In addition, housing estimates suggest a need for 90 wheelchair accessible affordable homes and 25 wheelchair accessible market homes each year for the next 5 years.

Moray therefore clearly faces a significant challenge with its projected ageing population and people's desire to live and be cared for in their own homes for longer. The MLDP2015 introduced a policy on Accessible Housing requiring all new developments of 10 or more units to provide 10% of the market housing units as accessible housing (built to wheelchair accessible standard) of which half should be in single storey format. The MLDP2020 policy was amended through the Examination process to state;

"Housing proposals of 10 or more units incorporating affordable housing will be required to provide 10% of the private sector units to wheelchair accessible standard. Flexibility may be applied on sites where topography would be particularly challenging for wheelchair users."

In practice, the MLDP2020 policy has delivered 2 storey housing which are not overtly marketed to older or disabled people, and which would require significant adaptation to facilitate occupation by a wheelchair user i.e. fitting of a through-floor lift and wet floor shower which may have to be provided via publicly funded disabled adaptations.

This analysis suggests that the current planning policy in place is not sufficient to meet the requirement for accessible homes.

Given the scale of local need for wheelchair accessible homes and the overall need for affordable housing, there is a need to develop a local policy position in LDP2027 to require a greater proportion of wheelchair accessible homes to be provided in the market housing at ground floor, recognising that this has implications on site density and viability.

Student accommodation (HNDA p70)

In March 2023 a paper on the University of the Highlands and islands (UHI) student accommodation requirements was presented to the Convention of Highlands and Islands (COHI) which gave an update on current provision and future student accommodation needs.

There are 40 rooms currently provided at UHI Moray which meets anticipated demand until the development of Moray Growth Deal additional campus provision for the MAATIC project which is anticipated to be complete 2026/27. The future requirements are for a minimum 150 rooms required by 2035, which could be provided as part of a regional approach including key worker and housing association properties.

In addition to UHI Moray student requirements, the Glasgow School of Art, based on Altyre Estate, south of Forres has a requirement for dedicated student accommodation as their need is currently being met through a range of local providers. Altyre Estate are currently exploring how this need can be met at the Dallas Dhu site, which is in close proximity to the school of art premises.

Key workers

Key worker surveys undertaken as part of the HNDA (p69) found that major future recruitment/ retention pressures are being experienced by the public sector in Moray including Moray Council, the NHS and the private sector. The housing types most needed are private rented sector homes (30%),

mid- market rent and home ownership with respondents identifying Elgin as the priority area for key worker housing.

The MOD is anticipating a short term (2-3) year surge in housing requirements and has implemented a combination of solutions to address this surge and pinch points with an emphasis on maximising use of existing stock and building single living accommodation. This should mitigate any major housing market impacts associated with personnel moving into the area.

The HNDA estimates that approximately 120 key worker units may be required in the immediate future.

Gypsy Travellers and Showpeople (HNDA p80)

In 2023, Moray Council Housing service commissioned a research study as part of the HNDA into the 'Accommodation Needs of Gypsy/Travellers and Travelling Showpeople in Moray. The research included analysis of best practice guidance and previous research, analysis of local data held by Moray Council as well as fieldwork to engage with the Gypsy/Traveller Community and Showman's Guild. The study concluded in July 2023 and offers the most recent estimates of accommodation/site requirements for Gypsy/Travellers and Travelling Showpeople across Moray informed by analysis of unauthorised encampments and the views of the Gypsy/Traveller Community living in Moray.

There were 79 Gypsy/Travellers recorded as living in Moray in the 2011 Census. There is a population of Gypsy/Travellers households living in settled accommodation throughout Moray.

There are currently no public Gypsy/Traveller sites in Moray with the Council focusing on managing unauthorised encampments. In 2022, there were 13 unauthorised encampments across Moray. Analysis of unauthorised encampments between 2021 and 2022 shows that there has been a declining number of encampments with a peak in 2013 of 58 reducing to 13 in 2022.

Analysis of length of stay and location of the encampments between 2020 and 2022 shows that in 2020 and 2021, there were 15 encampments each year totalling 580 and 463 days, respectively, and in 2022 there were 13, totalling 478 days. The number of groups without children has been increasing, and the number of vehicles per group has been declining. There is activity across most of the calendar year (except January and February), with more encampments evident in the spring and summer.

Analysis of the location of unauthorised encampments across Moray HMAs identified that the Elgin HMA has the highest number of sites known to be used by Travellers at 10 discrete locations. Encampments in Buckie HMA have tended to last the longest number of days. There have been no encampments in either Keith HMA or Speyside HMA since 2020.

As part of the research project, views were sought from Gypsy/Traveller households who were living in private sites in Moray. Although the sample size achieved was small with 4 travellers participating (one family and one solo traveller). One participant felt there should be a public site with mixture of permanent and temporary pitches, which supports previous research undertaken, suggesting a demand for mixed provision of pitches. In addition, one participant who has a wheelchair user in their family contended that Traveller sites are rarely accessible for those with mobility issues.

There are 8 locations across Moray currently used as sites by Travelling Showpeople: one site (Elgin Auction Centre) is a private site, while the rest are operated by Moray Council. Neither the Seafield site in Keith nor the Strathlene site in Buckie are popular among Travelling Showpeople. According to previous engagement with the Scottish Showmen's Guild, many sites across Scotland suffer from a lack of adequate facilities, particularly water and power sources. The local development plan will have to consider the impact of any of these sites being developed.

Self- Build Register

Moray Council published a self- build register in October 2023, inviting people interested in self-build to register their interest to help gauge demand for such provision across Moray. To date, interest has been

fairly limited with 11 registered entries. The majority of interest has been expressed in rural areas around Elgin.

Short Term Lets

Spatial mapping of Short Term Lets and second homes is being prepared and will be included within the Evidence Report.

Summary of Stakeholder Engagement

- Local authority housing- Fiona Geddes, Housing Strategy and Development Manager
- Social housing providers have been engaged through preparation of the HNDA- through the Housing Market Partnership
- Private housing providers- through Homes for Scotland north region Committee and the Housing Market Partnership and through stakeholder workshops to develop the HNDA.
- Landowners- engaged through HNDA process.
- Public services- engaged through HNDA process.
- Representative bodies of housing providers and landowners- as above
- Gypsy Travellers and Travelling Showpeople- engaged through HNDA.

Copies of this schedule were sent to;
- Fiona Geddes, Moray Council Housing Strategy and Development Manager
- Homes for Scotland (HfS)

Summary of implications for the Proposed Plan

Taking account of the high levels of affordable housing need evidenced in the HNDA, it is proposed to continue with the current local policy requirement for all developments of 4 or more houses to provide 25% affordable units in accordance with NPF4 Policy 16 which requires that proposals for market homes will only be supported where the contribution to the provision of affordable homes on a site will be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where;
- a higher contribution is justified.
- a lower contribution is justified, for example, by evidence of impact on viability, where proposals are small in scale or to incentivise particular types of homes such as self- build or wheelchair accessible homes.

A tailored local policy position will be required to ensure a contribution towards affordable housing is provided by all sites, as per the MLDP2020, with criteria to address;
- piecemeal and individual plot development proposals- these are currently only supported where details for the comprehensive redevelopment of the site are provided and for proposals of less than 4 market housing units a commuted payment will be required towards meeting housing needs in the local housing market area.
- A contribution of less than 25% will only be considered where exceptional site development costs or other project viability issues are demonstrated.

Specialist housing

Accessible housing estimates therefore suggest a need for 153 homes each year for the next 5 years.

Wheelchair housing estimates suggest a need for 90 homes per annum for the next 5 years.

This analysis suggests that the current planning policy in place is not sufficient to meet the requirement for accessible homes.

Given the scale of local need for wheelchair accessible homes and the overall need for affordable housing, there is a need to develop a local policy position in LDP2027 to require a greater proportion of wheelchair accessible homes to be provided in the market housing at ground floor.

The Local Development Plan will need to make to meet demand for student accommodation in consultation with Moray College UHI and Glasgow School of Art and for key worker accommodation in discussion with community planning partners and industry representatives.

Gypsy Travellers/ Showpeople

The 2023 research provided the following recommendations which include site estimates and these should be reflected in the local development plan.
- Prioritise developing one or two public sites for Travellers with a mixture of permanent and temporary pitches. Based on the 2009 and 2017 research recommendations and the downward trend in encampments in recent years, a combined occupancy of 15-20 pitches should be sufficient. Sites should be in semi-rural areas with easy access to public services. Buckie and Elgin consistently have high levels of unauthorised encampments, so should be prioritised as areas for site development.
- The provision of the sites used by Travelling Showpeople are considered to meet demand, Moray Council should review the sites to ensure facilities are adequate to meet the needs of Travelling Showpeople in terms of amenity and accessibility.

Self- Build

The Proposed Plan should consider appropriate approaches to meet demand for self-build plots, respecting wider policy approaches such as Local Living.

Short Term Lets and Second Home

The Proposed Plan should consider the spatial implications of Short Term Lets and whether there is a need for Control Areas to be introduced. At the time of drafting, there were 491 short term let license applications There are 752 second homes in Moray.

Statements of Agreement

Homes for Scotland

Homes for Scotland (HfS) recognises the challenges facing the future delivery of affordable and specialist housing in Moray, noting the increasingly ageing population, declining economically active population and the associated challenges in respect of delivering the right housing type together with necessary health and care infrastructure/ interventions. This is also set in the context of a decreased Scottish Government budget across all local authorities to deliver affordable housing.

Moray Council should provide evidence of the RSLs and affordable housing providers that have been consulted in respect of the delivery of the required affordable housing to take account of viability, funding, and deliverability. Evidence should also be shown of the capacity, funding, and ability of these providers to deliver the housing that is needed.

A clear definition of 'accessible' housing should be included and needs to include the full spectrum of housing type needs.

In terms of accessible and affordable housing, a cautious approach needs to be taken in respect of proposing at this stage that 25% affordable and 10% wheelchair accessible housing (implying these to be single storey) will apply across future market housing sites. This is very prescriptive and could make many developments unviable resulting in lower numbers of affordable/ specialist homes being delivered.

The percentage of market homes (17-19%) seems low considering the up-to-date evidence in the Diffley Partnership/ Rettie & Co report commissioned by HfS. This should be re-run, particularly considering the full range of existing and future housing need and taking a genuine growth scenario in terms of considering how the majority of the Council's future affordable and specialist housing will be delivered and how much will be reliant on the private market industry to assist delivering.

Council response

The HNDA sets out details of the affordable housing providers who were engaged in the development of Assessment as part of the Moray Housing Partnership, which HfS are also members of.

The Council is conscious of viability concerns, heightened by the current economic challenges, however the evidence is clear regarding the need for affordable and accessible housing.

The Diffley Partnership/ Rettie & Co report was received by the Council on 15 March 2024 and has no status in the local development planning process and Moray Council has not been involved in this report. The Moray HNDA has been signed off as being robust and credible by the Scottish Government and provides the evidence base for the local development plan. A "genuine growth scenario" is set out and supported in the HNDA. The delivery of affordable and specialist housing will be dependent on Scottish Government funding.

Statements of Dispute

Homes for Scotland (HfS)

HfS have submitted a new piece of primary evidence on existing housing need for Moray, undertaken by the Diffley Partnership and Rettie & Co (on behalf of HFS) (as also set out also in HFS's schedule 8a submission) which needs to be considered.

The full array of affordable homes and specialist housing need is required by the Act. This should include older peoples living requirements – accessible, wheelchair, adapted, non-permanent, supported, care as well as support for independent living at home, traveller/ gypsy sites, students (the latter two of which have been considered). Evidence relating to second homes and short term lets should be included.

There is concern that the level of market housing proposed under the LHLR will be insufficient to deliver the level of affordable and specialist homes that are needed, let alone contribute to the required level of infrastructure and social/ care interventions required if the forecasted population changes occur.

Primary data must be gathered to ascertain what the actual requirement for specialist housing is in Moray before seeking any on-site provision within new housing developments through the emerging LDP. The requirement for more single-storey homes is overly prescriptive. Clear evidence and consultation is required to ensure full consideration has been taken of existing housing adaptations. HFS welcome discussions over site densities of existing allocated sites and raise the blurring between building control and planning requirements in terms of space standards/ requirements moving forward.

HFS also urge Moray to review how the level of need will be delivered considering budgetary constraints moving forward and how the private sector can play a significant role in facilitating this.

Council response - The Diffley Partnership/ Rettie & Co report was received by the Council on 15 March 2024 and has no status in the local development planning process and Moray Council has not been involved in this report. The Moray HNDA has been signed off as being robust and credible by the Scottish Government and provides the evidence base for the local development plan.

Number of second homes and short term lets has been added following this comment.

Affordable housing providers with stock in Moray are all represented on the Housing Market Partnership. Affordable housing providers who are active in the delivery of the Strategic Housing Investment Plan are consulted on the Plan's refresh each year. Moray Council has an excellent track record on maximising the take up of available Scottish Government More Homes Division grant funding. Actual spend outturn has exceeded Moray's Resource Planning Assumption for many years. Moray's pipeline of opportunities for delivery of affordable housing means that we have been in a position to take up spend slippage in other local authority areas to the advantage of those in housing need.

Issue: Topic / Place	9. Rural Homes
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15(5)- the housing needs of the population of the area, including, the needs of persons undertaking further and higher education, older people and disabled people. • Section 15(5)(cc) - the desirability of allocating land for the purposes of resettlement • Section 15(5) – extent to which there are rural areas to which there has been a substantial decline in population • Section 16(2) (ab) – have regard to the list persons seeking to acquire land in the authority's area for self-build.
	CD104 Moray Local Development Plan Main Issues Report Rural Housing Topic Paper **CD105** NPF4 Policy 17 Rural Homes Planning Interpretation Note (PIN) **CD106** Kinloss Golf Course Masterplan **CD072** Moray Local Development Plan Monitoring Report 2021 **CD028** Moray Local Development Plan Monitoring Report 2023 **CD101** Moray Council Self Build Register February 2024 **CD005** Moray Local Development Plan 2020 - Volume 3 - Rural Groupings

NPF4 Context

The intention of NPF 4 Policy 17 Rural Homes is to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable rural homes in the right locations. NPF 4 also recognises that the Moray Local Development Plan should set out a tailored approach for rural housing to safeguard the distinct character of the area and reflect locally appropriate delivery approaches.

Summary of Evidence

Moray Local Development Plan - Main Issues Report Rural Housing Topic Paper

A Rural Housing topic paper was prepared as part of the Moray Local Development Plan (MLDP) 2020 Main Issues Report stage. The topic paper set out the background and analysis undertaken to redefine the approach to rural housing in Moray. This was an evidence led approach taking account of an assessment of development on the ground, a review of rural housing consents, a review of uptake of plots in rural groupings, cumulative build up analysis supported by landscape expertise, experience of officers with extensive knowledge of rural housing and evidence from the Moray Local Review Body (MLRB) decisions.

The conclusions reached were to tighten the rural housing policy to reinforce the settlement hierarchy by directing new development to rural groupings in the first instance, followed by reuse and replacement of existing buildings and lastly to sites in the open countryside. A key objective was to promote a more sustainable pattern of growth and seek to limit the suburbanisation of the countryside. Based on cumulative build up data pressurised areas were identified as being unsuitable for further housing. There was a clear pattern of pressure for rural housing on the edge of Moray's main settlements of Elgin, Forres, Buckie and Keith and this was reflected in pressurised area maps that were created to support the policy. The Rural Housing Topic Paper prepared to support the MLDP 2020 identified that Moray's smaller towns and villages (27 in total) combined, had an average completion rate of 34 homes whilst the average completion rate of rural homes in the open countryside was 42 homes. Furthermore, close to 50 rural housing consents were granted in close proximity to one another

in area on the edge of Elgin (Birnie) over a 5-year period. This is shown in map form in the Rural Housing Topic Paper. To try and alleviate this, areas of intermediate pressure were identified to direct new housing into areas where the landscape could more easily accommodate further development subject to meeting siting and design requirements. The siting criteria was seen as an important means of ensuring sites would have appropriate backdrop and enclosure to provide containment and ensure new houses fitted sensitively into the landscape. The design criteria developed promote simple traditional forms of housing with a limited palette of appropriate materials and the avoidance of excessive detailing. This approach closely aligns with the desired outcomes of NPF 4 Policy 17 which seek to ensure that the distinctive character, sense of place and natural and cultural assets of rural areas are safeguarded and enhanced.

This policy approach has been in place since 2020 and evidence from Monitoring Reports in 2021 and 2023 evidence that it is working well (see section below). In summary, no new pressurised areas have emerged, design standards have improved, and design criteria have been tested at the MLRB with decisions supporting policy requirements including restricting the height of new homes and avoiding the use of concrete tiles. To date there have been no new consents in any pressurised or sensitive areas.

It is noted that reference is made to the Scottish Government 6-fold Urban Rural Classification 2020 as a consistent way of defining areas based on population and accessibility. It is also accepted that finer grained, local classifications can be used to ensure rural housing approaches are locally tailored to reflect local circumstances. On that basis the Council considers the local approach based on detailed information gathering, officer experience and in depth knowledge of the issues alongside landscape expertise is a more appropriate means of establishing a tailored approach to rural housing. The use of the 6-fold Urban Rural Classification is not considered appropriate to Moray as it would open up pressurised and sensitive areas such as the coast exacerbating the issue that the current LDP policy is seeking to address.

Identification of New Rural Groupings

The identification of a sensitively sited new rural grouping in an area identified as being under pressure from cumulative build up of new housing was part of the approach to reinforcing a rural development hierarchy. Miltonhill was identified as a new rural grouping with development potential for 20 homes alongside holiday accommodation as part of a diversification away from the existing use as a golf course. The Council worked in partnership with the landowner and a design team to create a Masterplan to deliver a high quality development of innovative timber homes that utilise renewable technologies. At the time of writing all plots have planning consent and over half have been constructed and are occupied. The intention is to continue to direct development to rural groupings and explore opportunities to identify new rural groupings.

Role of Existing Rural Groupings

Monitoring Reports in 2021 and 2023 evidenced that there has been a lack of take up of plots in existing rural groupings. To reinforce the identified rural hierarchy existing groupings, need to contribute more in terms of delivering housing sites. There is no definitive answer as to why more sites have not come forward, it is considered there are a number of factors including escalating build costs, legacy of a high number of extant consents for individual plots in the open countryside due to previous permissive rural housing policies and lack of marketing/interest from landowners. It may be plots with rural groupings are more in demand as the number of existing consents in open countryside reduce.   Going forward further evidence needs to be gathered and an approach developed to enable rural groupings to increase their contribution to the rural housing market in Moray which is a more sustainable form of development.

Rural Homes Planning Interpretation Note (PIN)

A Planning Interpretation Note (PIN) was prepared by the Council to interpret NPF4 Policy 17 Rural Homes as an interim position. Moray Council's tailored approach is set out in Policy DP4 Rural Housing of the Moray Local Development Plan 2020 and other relevant policies and the guidance clarifies the local approach to what constitutes an "allocated" site in terms of NPF4 Policy 17.The guidance also provides detailed local policy interpretation for a wide range of rural housing scenarios including homes for retiring farmers, homes for essential needs workers for rural businesses, enabling development for historic assets and crofts/ woodland crofts. The guidance also states that there are no previously inhabited areas other than the Cabrach that are deemed suitable for resettlement in Moray.

Moray Local Development Plan Monitoring Reports 2021 and 2023

The 2021 and 2023 Monitoring Reports demonstrate that the current policy approach is working. It is successfully protecting pressurised areas from further inappropriate development. The siting and design policy requirements are also driving better located houses within the landscape and design standards have also improved with more traditional simple forms of homes being delivered on the ground. Since the adoption of NPF 4 Policy 17 there have been no planning applications that have been determined based on information pertaining to the essential needs of workers in rural development or homes for retiring farmers. In the few limited applications for workers accommodation sites have been in areas of intermediate pressure and met siting criteria. Historically, this has not been an issue in Moray over the last 20 years and has not featured as a policy requirement. In addition to this there are concerns regarding occupancy conditions not being enforceable, Policy 17 Rural Homes being open to abuse to the detriment of Moray and an approach that is contrary to aspirations for climate resilience.

Moray Council Self Build Register

At the time of writing there are 10 entries on the self build register. The limited data collated so far indicates that there is demand for individual serviced rural house plots for large family homes situated near Moray's towns and villages. The desire to construct innovative/sustainable self build homes was also expressed. This demand is consistent with trends observed when developing the current rural housing approach. The delivery of self build plots within existing rural groupings and the potential for identification of new rural groupings in pressurised areas is an essential part of the solution creating clustered development, delivering more sustainable patterns of development and sustaining rural communities. This will be further considered through the LPD 2027.

Moray Local Development Plan 2020 – Volume 3 Rural Groupings - Cabrach

The Cabrach is an identified rural grouping in the Moray Local Development Plan 2020. Given its unique circumstances there is no defined boundary or specific development opportunities identified, unlike all the other identified rural groupings. Instead, the wider area of the Cabrach reflective of the areas of interest of the Cabrach Trust is identified to facilitate development including low impact and modest scale proposals for regeneration of the community including housing, employment and low and zero carbon generating technologies. This approach positively encourages rural development to help repopulate and sustain this remote rural community through sustainable economic growth and is in keeping with the NPF 4 ambitions for resettlement. Highlands and Islands Enterprise (HIE) identified the Cabrach as the only fragile community in Moray and as such it is deemed to be the only area appropriate for resettlement in Moray.

Housing Needs of the population and demographics

Housing needs for Moray including the needs of persons undertaking higher education, older people and disabled people and the availability of land for housing including for older people and disabled people is set out in Schedule 9b Housing. The MATHLR figure and annual Housing Land Audit (HLA) and methodology underpinning it are set in Schedule 9 Housing.

In terms of understanding population change over time in rural areas release of the 2022 census data is awaited and when published analysis will be undertaken to see how rural populations have changed over time.

Conclusion

A tailored approach to rural housing will be developed taking account of the evidence gathered and local knowledge. The policy must reflect the characteristics of the rural housing market in Moray and balance supporting rural housing and preventing further suburbanisation of the countryside and unsustainable patterns of travel. Following the success of creating a new rural grouping to cluster new development and promote sustainable and innovative design options for replicating this approach will be explored. To further strengthen the rural development hierarchy and support more affordable homes in the countryside the Council will seek to work closely with landowners to assist in the delivery of serviced plots for self-build in existing rural groupings. The Cabrach will be identified as an area for resettlement. Further consideration will be given to rural population census data when it is made available.

Summary of Stakeholder Engagement

Copies of this schedule were sent to:
- Highlands and Islands Enterprise
- Cabrach Trust – see statement of agreement below.
- Communities Housing Trust
- Crofting Commission

Summary of Implications for the Proposed Plan

- Prepare a tailored approach to rural housing in Moray taking account of existing evidence, local knowledge/experience and specific conditions and characteristics of Moray.
- Investigate identification of new rural grouping/s in pressurised areas in Moray to meet demand.
- Work with landowners to identify and increase the delivery of plots in existing rural groupings.
- Identify the Cabrach as an area suitable for resettlement.
- Analyse 2022 Census rural populations data and identify if there are any impacts on approach to rural housing.

Statements of Agreement

Cabrach Trust

With regards "no defined boundary or specific development opportunities identified". The Cabrach, as a rural parish, is well defined and rich in cultural history. Further, in the Cabrach, and under the auspices of The Cabrach Trust, several development opportunities are navigating construction and planning activity, including development of a new social enterprise distillery and heritage centre, restoration of a community and learning hub, and the progression of design activity on a small rural housing portfolio.

Owing to the Cabrach's designation as the only fragile community in Moray, and thus deemed to be the only area appropriate for resettlement in Moray, recent significant inward investment is worth noting, including funding from Highlands & Islands Enterprise, the Scottish Government, Social Investment Scotland, and significant private philanthropy.

The work being taken forward by The Cabrach Trust and wider community has the potential to bring about systemic change and regeneration in the Cabrach, with the potential of becoming an exemplar of rural regeneration in action.

Moray Council consider the balance of information within the schedule to be proportionate in terms of reference to the Cabrach. The additional information provided is not considered to constitute evidence but instead provides further contextual detail. On that basis it is not proposed to amend the schedule.
Statements of Dispute
None identified.

Issue: Topic / Place	10a) Infrastructure First
Information required by the Act regarding the issue addressed in this section	The Town and Country Planning (Scotland) (Act) 1997, as amended: • section 15(5)(d) The infrastructure of the district (including communications, transport and drainage systems for the supply of water and energy, and health care and education facilities); • section 15(5)(e) How that infrastructure is used; • section 15(5)(cd) The health needs of the population of the district and the likely effects of development and use of land on those health needs; • section 15(5)(ce) The education needs of the population of the district and the likely effects of development and use of land on those education needs; and • section 15(5)(cg) The capacity of education services in the district. The Town and Country Planning (Development Planning) (Scotland) Regulations 2023: • Regulation 9(2)(e) The planning authority are to have regard to the following plans and strategies, insofar as relating to the local development plan area: (i) The national waste management plan; (ii) Any regional transport strategy; and (iii) Any local transport strategy.
Links to Evidence	**CD119** Scottish Government Circular 3/2012 Planning Obligations and Good Neighbour Agreements **CD120** Moray Community Planning Partnership Local Outcome Improvement Plan (LOIP) **CD001** Moray Local Development Plan 2020 – Volume 1 - Policies **CD121** Moray Developer Obligations – Supplementary Guidance – 2020 **CD097** Moray Housing Land Audit – 2023 **CD122** Scottish Government National Improvement Framework **CD123** Scottish Government Scotland's Learning Estate Strategy 'Connecting People, Places and Learning' **CD124** Moray Council Learning Estate Strategy 2022-32 **CD125** Moray Council School Roll Forecast March 2024 **CD126** NHS Grampian Asset Management Plan Update 2020-2030 **CD127** NHS Grampian Infrastructure Investment Plan 2019-24 **CD128** NHS Grampian Strategic Plan A Plan for the Future 2022-28 **CD129** NHS Grampian Strategic Plan A Plan for the Future Delivery Plan 2023-26 **CD130** NHS Grampian A Plan for the Future – Dr Gray's Hospital 2023-33 **CD131** GP Premises Direction Guidance Note Annexe 1 **CD132** Premises Direction 2004: GP Unit Sizes **CD133** 2018 General Medical Services Contract in Scotland **CD134** Scottish Health Planning Notes 36 Part 1 General Medical Practice Premises

	CD135 Scottish Health Planning Notes 36 Part 2 NHS Dental Premises
	CD136 Scottish Health Planning Notes 36 Part 3 Community Pharmacies
	CD137 Moray Council Draft Sport and Leisure Capital Investment Plan 2022-32
	CD138 Scottish Water Capacity Plans and Datasets for Moray
	CD139 National Grid Energy System Operator (ESO) Pathway to 2030
	CD140 SSEN Summary Report on Consultation Beauly to Peterhead November 2023
	CD141 Reaching 100% (R100) Programme
	CD142 Future Cemetery Provision Strategy 2018
	CD143 SEPA Scottish Household Waste Generated and Managed Statistics 2022
	CD144 Defence Infrastructure Organisation Safeguarding Consultation Zones Map

National Planning Framework 4 (NPF4) Context

Policy 18 Infrastructure First sets out that the LDP and Delivery Programme should be based on an integrated infrastructure first approach. This means that infrastructure needs are understood early in the development planning process as part of an evidence-based approach, and that infrastructure considerations are integral to development planning and decision making. The LDP and Delivery Programme are to set out the infrastructure requirements to deliver the spatial strategy, informed by the evidence base.   This is to include information on the location, type, delivery timescales and body, and the level of contributions. The LDP and Delivery Programme are to align with relevant national, regional and local infrastructure plans and policies and the Scottish Government's infrastructure investment hierarchy and sustainable travel and investment hierarchies.

Policy 15 Local Living and 20-minute Neighbourhoods sets out that the LDP is to encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options. A key outcome is that new and existing communities are planned together with homes and key local infrastructure including schools, community centre, local shops, green spaces, health and social care, digital and transport links. Mixed use neighbourhoods support health and well-being, reduce inequalities and are resilient to the effects of climate change. LDP's should support local living within settlements through their spatial strategy and associated site briefs and masterplans. Local Living is dependent on the provision of key local infrastructure. Local Living is addressed in Schedule 7.

Policy 13 Sustainable Transport is addressed separately in Schedule 10b.

Policy 11 Energy sets out that LDPs should seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy production. This schedule only covers relates to grid/network capacity. Policy 11 is covered in detail in Schedule 5.

Policy 12 Zero Waste sets out that LDPs should encourage, promote, and facilitate development that is consistent with the waste hierarchy. This means that the reduction and reuse of materials in construction is prioritised and that infrastructure for zero waste and to develop Scotland's circular economy is delivered in appropriate locations. Therefore, LDPs are to identify appropriate locations for new waste management facilities and meet identified needs in a way that moves waste as high up the waste hierarchy as possible.

Policy 24 Digital Infrastructure sets out that LDPs should support the delivery of digital infrastructure, including fixed line and mobile connectivity, particularly in areas with gaps in connectivity and barriers to digital access.

Moray Local Development Plan 2027 (LDP27)

The infrastructure necessary to support, promote and facilitate sustainable, productive, and liveable places needs to be based on both quantifiable (e.g. capacity of facilities) and qualitative (e.g. health and well-being) information. NPF4 policy 15 Local Living sets out that places and/or neighbourhoods that support health and well-being, reduce inequalities and that are resilient to the effects of climate change need to be planned with key local infrastructure such as schools, community facilities, health, and social care, etc. Preventative planning can potentially significantly reduce public sector spending in the longer term. The delivery of the necessary infrastructure is largely dependent on the availability of funding at national government level and local government budgets.

In terms of the necessary infrastructure to facilitate development growth, an approach similar to that currently set out in the Moray Local Development Plan 2020 (LDP 2020) and associated Development Obligations Supplementary Guidance (SG) will be considered for the LDP27. The LDP 2020 Primary Policy 3 (PP3) Infrastructure and Services together with the Settlement Statements sets out the level, type and location of infrastructure necessary to support development. Sites expected to contribute are also identified. Further detail is set out in the SG which allows regular reviews to be undertaken to reflect changing local circumstances or policies, inflationary increases for rates, etc. (i.e. areas that cannot wait for a 10-year LDP review). The LDP 2020 Delivery Programme sets out who, when, how and by whom the infrastructure will be delivered, and priorities, as far as practically possible. The LDP 27, Delivery Programme and any associated planning guidance will be informed by a robust evidence base as discussed in this Schedule.

Moray Council facilitate a LDP Delivery Group which includes a wide range of representatives from NHS Grampian, Moray Health and Social Care Partnership (HSCP), Scottish Water, Scottish Gas Networks (SGN), SSEN Transmission and/or SSEN Distribution, Transport Scotland, and Council Services for Education, Transportation, Sports and Recreation, and Housing. Other representatives attend, as and when required. In accord with the Place Principle, opportunities to work together to share resources are identified and explored through this Group as well keeping the evidence base up to date. This Group informed the LDP2020 infrastructure requirements as well as subsequent reviews of the SG, and similarly the Group will inform the evidence base for the LDP27 and Delivery Programme.

Summary of Evidence

EDUCATION

Learning Estate Strategy (LES)

The Moray Council Learning Estate Strategy 2022-32 (LES) aligns with both the Scottish Government's 'Scotland's National Learning Estate Strategy: Connecting Peoples, Places and Learning' and the National Improvement Framework and the local priorities set out in Moray Council's Local Outcomes Improvement Plan (LOIP) and Corporate Plan.

The LES covers Early Learning, Additional Support Needs (ASN), and Primary and Secondary Education. It sets out a 10-year plan on how Moray Council will work to optimise its investment of resources in a prioritised manner to meet the future needs of learning and teaching. The LES aspirations and key drivers of excellence, inclusion, place and sustainability are underpinned by 10 Guiding Principles of the National Learning Estate Strategy.

A range of factors influence the LES proposals and their delivery. These include pre-school/school roll trends, Additional Support Need (ASN) requirements, early learning centre/school/enhanced provision capacities, space to grow, building condition (fabric, safety and security), building sustainability, educational factors such as opportunities for outdoor learning and pupil choice, community benefit factors, partnership opportunities to align building investment across local public sector providers, house build completions and net zero targets. Together these factors will determine future recommendations to close, merge, extend, build, rezone or mothball educational facilities in Moray. The LDP informs, and is informed by, the LES to determine the future planning and coordination of the learning estate with development in Moray. The outcome of any actions within the LES that has spatial implications (i.e. rationalisation or expansion of the estate) will be reflected in the LDP.

In Moray, there are:
- 8 Secondary Schools
- 45 Primary Schools (including Crossroads Primary School which is currently mothballed)
- 17 Additional Support Needs Enhanced Provisions within secondary and primary schools
- 62 Early Learning and Childcare Centres (ELC) (24 Local Authority ELC, 11 partner ELC that have lease agreements with the Local Authority for the space they use, and 11 private ELC). 23 Local Authority and 11 partner ELC are co-located with primary schools with the only exception being Lady Cathcart in Buckie which is a standalone facility.

Constraints/Challenges & Spatial Implications for LDP27

Early Learning and Childcare (ELC)
The ELC Expansion Programme is almost complete with one minor project at Portgordon nursery outstanding. This project is due to be completed summer 2024. The SRF is indicating a falling primary school roll over the next 5 years and given the recent annual fall in birth rates this may be reflected in future early learning pupil numbers. This will be taken into consideration in the future planning for ELC.

Additional Support Needs (ASN)
The requirement for an overall ASN strategy is under consideration by Moray Council. ASN requirements can have an impact on the learning estate in terms of the size of buildings given higher space ratios per pupil, etc. and outdoor learning environments. Work is in progress with early health data to inform an understanding of the primary school ASN requirements and similarly with primary school ASN data to inform secondary school ASN requirements. This will inform an overall ASN strategy which may have an impact on the infrastructure requirements for the learning estate. Where an impact has a spatial implication, for example, the need to identify land for additional accommodation, access to outdoor space, etc. this will be reflected in the LDP.

Primary and Secondary Education
The School Roll Forecast (SRF) is published annually. It is based on school census data released in September and a number of other data sources such as the National Records of Scotland, NHS Grampian and the Moray Housing Land Audit (HLA).   The SRF published in March 2024 identifies that the following schools have a rising school roll forecast and will reach the capacity thresholds (90% for Secondary Schools, 80% Planning Capacity for Primary Schools) set out in the Developer Obligations Supplementary Guidance in the next 10 years:

Buckie
- Buckie High School
- Cluny Primary School

Elgin
- Elgin High School

- Bishopmill Primary School (Elgin Academy ASG)
- Seafield Primary School (Elgin Academy ASG)
- Linkwood Primary School (Elgin High School ASG)
- Greenwards Primary School (Elgin High School ASG)
- Mosstowie Primary School (Elgin High School ASG)

Forres
- Anderson's Primary School
- Logie Primary School

Speyside
- Mortlach Primary School

The LES high level programme set out a number of priority projects over the 2022-2032 period. The LES programme has been updated due to changes in a number of information factors (such as falling birth rates, and slower completion rates) and the following are identified as priority projects:
- New Build Forres Academy
- Elgin High School Extension
- Future Buckie High School – options appraisal to consider new build, refurbishment and hybrid
- Elgin South (West) Primary School Capacity Increase – options appraisal to consider a new Primary School or school extension projects.

This reflects that the above schools are at or reaching their capacity thresholds and/or that the range of factors set out in the LES such as the condition of the school requires action by the Council.

As set out in the LES a comprehensive review of each Associated School Group is to be undertaken by Moray Council. The purpose is to agree an approach with the community and other key stakeholders such as children, school staff and service providers on the future investment within the ASG area and agree actions to take forward a more sustainable learning estate within the timeframe and budget available. The first round of engagement on the 'Sustainable Learning Estate' for the Forres ASG commenced in September and finished in December 2023 with community drop-in sessions held in October 2023. Engagement on the Buckie ASG has recently commenced. Engagement on the 6 remaining ASG's is planned to be completed in early 2025. The outcome of the ASG reviews which may include rezoning, merging or rationalisation of the learning estate will be reflected in the LDP27.

A programme of full condition surveys for the learning estate is in progress and is anticipated to be complete early 2025. These include carbon reduction surveys and will identify major upgrade works and prioritise projects to address these. Lifetime maintenance plans will also be developed for all schools to ensure they are maintained at minimum B standard for condition and suitability. These surveys and maintenance plans will inform future recommendations for the learning estate, and where these have spatial implications, such as extending the premises or outdoor space outside the current school site boundary these will be reflected in the LDP.

A review of the LES Delivery Programme including a review of the strategic roadmap which focuses on savings options is underway and will be reported to a meeting of Moray Council in early 2024. This will inform the timeline and options for delivery of the LES. This, or any subsequent review, will be reflected in the LDP and the LDP Delivery Plan.

There are a number of variables that impact on the forecasting of school rolls and in turn, capacity which may potentially affect future recommendations for the LES. These are largely external and include the movement of personnel associated with the Ministry of Defence (MOD) Royal Air Force (RAF) Lossiemouth and MOD Engineer Regiment at Kinloss, fluctuations in birth rates, house build completion rates, funding available from both national and local government budgets particularly for larger infrastructure projects, and alignment of strategies, plans and investment processes within and

between different organisations. For example, the delivery timescale for the Future Forres Academy project has largely been dictated by the award of Learning Estate Investment Programme 3 (LEIP3) funding from the Scottish Government. The impact of external variables, which are monitored by the Council as much as practically possible, inform future decisions on the LES.

Spatial Implications

As set out above, consideration will need to be given to the quantifiable and qualitative aspects of placemaking and local living in terms of the review of educational facilities within Moray. The availability of funding is an important factor in delivering local infrastructure to promote, support and facilitate local living and its associated benefits. Any revisions to the school estate will be subject to the statutory consultation set out in legislation.

Forres

Moray Council will receive Scottish Government LEIP 3 funding (in post completion revenue grants over the next 25 years) to support delivery of a replacement Forres Academy secondary school. The bid was successful due to the poor condition rating (D – Bad). The original earliest project date for delivery of the new school was August 2029 however due to the discover of RAAC in August 2023 the project completion has been brought forward to January 2028. Moray Council have engaged Hub North Scotland Ltd (HNSL) to commence work on a concept design for the new Forres Academy (under the Future Forres Academy project). A public engagement on a preferred site for the new build is planned for April 2024 with a final decision to be made the Education, Communities and Leisure Services Committee in May 2024. A formal consultation on the new school will take place following site selection.

Elgin

An extension to Elgin High School is planned to be delivered in late 2026. This is required as capacity is currently being exceeded in the school and there has been an increase in ASN space requirements. This is currently only managed due to temporary modular accommodation provided in 2023. The SRF is impacted upon by the residential development in progress and planned for the Elgin South area over the next 10-15 years which will exacerbate the capacity issues. Funding is available through the Scottish Government's LEIP2 programme to deliver the extension. Any implications from expanding the school beyond its current boundary will be reflected in the LDP however, a planning application will precede this.

A new primary school in the north of Elgin within the Findrassie expansion area and a new primary school in the Elgin South expansion area are identified in the LDP2020. The sites are identified within the respective Masterplans for these growth areas. A decision has been taken by Moray Council to defer for a 5 year period (revisited annually) the Findrassie primary school project due to a number of factors including rising project costs, lower housing build out rates than initially forecast, and the potential for existing schools within the Elgin Academy ASG catchment to accommodate pupils arising from the development in the short term. The LDP will reflect the outcome of any future decisions taken on the Findrassie primary school. Similarly, the requirement for a new primary school within the Elgin South area is under consideration and the LDP will reflect any future decisions taken.

Buckie

Due to the deteriorating condition of the current Buckie High School and anticipated future capacity constraints, the Council are progressing the Future Buckie High School project as an investment priority despite not receiving LEIP3 funding. Similar to the Future Forres Academy project, Hub North Scotland Ltd (HNSL) have been appointed to progress the project/design brief and outline business case (with updated cost model) for the Future Buckie High School. The anticipated completion date for these is April 2024. This will inform a number of options for consideration by Elected Members.

As set out in the LES high level programme plan the delivery timescale for the Future Buckie High School project is 2029/30 however, this may be impacted on by affordability given the Council's budgetary pressures. Any spatial implications arising from the Future Buckie High School project, Sustainable Learning Estate Buckie ASG review, which is due to commence imminently, and programme of condition surveys will be reflected in the LDP.

Remainder of Moray

As set out above, engagement on the Sustainable Learning Estate ASG reviews and programme of condition surveys will inform the future learning estate within each ASG area. The spatial implications will be reflected in the LDP.

Further Education

The University of the Highlands and Islands has a learning centre within Moray (known as UHI Moray). This is primarily located in Elgin. Two Moray Growth Deal (MGD) projects are associated with UHI Moray – the Business Enterprise Hub and Moray Aerospace Advanced Technology and Innovation Campus (MAATIC). The Business Enterprise Hub is a proposal within the Elgin City Centre Masterplan and forms part of a larger mixed used brownfield regeneration project within Elgin City Centre. Discussions are ongoing regarding MAATIC. The spatial implications arising from the MGD projects along with any additional student accommodation that may be required by UHI will be taken into consideration in the preparation of the LDP.

Moray Economic Partnership (MEP) Childcare Working Group

Childcare availability, specifically affordable wraparound childcare, has become an ever-increasing barrier to employment in Moray. This includes childcare outwith the statutory funded provision within the nursery or school day, including before and after school, as well as during the holidays which is preventing many parents from reaching their full employment potential and is a barrier to a productive economy. A short-life working group has been formed to develop a business case setting out the scale of the issue, economic consequences, and evidence of demand and capacity. The group began meeting in January 2023. Any implications in terms of land use (e.g. facilities) and/or community wealth building (e.g. training of childminders) will be reflected in the LDP27.

Infrastructure First Approach for Education and Developer Obligations

Developer obligations can form part of the funding for education infrastructure where the 5 tests of Circular 3/2012 and NPF4 policy 18 are met. Given that development viability is a key consideration in development planning, the level of developer obligations sought does not cover the full cost of education infrastructure. Therefore, the timescale for delivery is largely dependent on the availability of other forms of funding such as the Scottish Government LEIP.

A review of the Developer Obligations SG is currently underway. The LES, SRF and any other associated documents or decisions by the Moray Council will continue to inform the level and type of developer obligations sought. The review will inform the LDP27, Delivery Programme and any associated planning guidance.

HEALTHCARE

NHS Grampian Asset Management Plan Update 2020-2030 and NHS Grampian Clinical Strategy

The NHS Grampian Asset Management Plan underpins the delivery of the NHS Grampian Strategic Plan 'A Plan for the Future 2022-2028' and the strategies of the three Health and Social Care Partnerships that operate within Grampian. This includes the Health and Social Care Moray (HSC Moray). The NHS Grampian Asset Management Plan prioritises the available funding for delivery.

The NHS Grampian Strategic Plan outlines the changes that are increasing demands on healthcare: people living longer independent lives and often also living with chronic multiple conditions, a shrinking workforce relative to demand, and budgets that are not keeping pace with inflation. The NHS Grampian and HSC Moray strategic plans, and Asset Management Plan aim to deliver the 'Quadruple Aim' to improve people's health and well-being.

Physical infrastructure such as buildings, equipment and Information Technology (IT) has a key role to play in supporting the clinical care provided within Moray and Grampian, as a whole. The Asset Management Plan sets out the 4 key elements for the long-term planning of physical infrastructure for healthcare services. These include:

- Major site development plans: Establishing development plans for each main site, including Dr Gray's Hospital in Elgin.
- Primary Care Premises (PCP) Plan: Identifies priorities for future investment in new and development of existing primary care infrastructure and informs Board decisions regarding the development of future initial agreements to support the case for investment in new premises. NHS Grampian and HSC Moray are currently working on updating the Grampian PCP Plan. Maryhill (Elgin), Fochabers and Keith Medical Practices are identified as priority PCPs within the NHS Grampian Asset Management Plan. The updated PCP Plan and NHS Grampian Asset Management Plan will inform healthcare infrastructure within the LDP27.
- Digital Strategy: The Grampian Service Transformation through Digital: a Strategy 2020-25 sets out a roadmap for the adoption of new ways of working through new technology.
- Infrastructure Programme Board: Establishment of new Board to target investment on a prioritised and risk assessed basis. The development plans for Dr Gray's reports to this Board.

The spatial implications of the above such as any rationalisation or expansion of the healthcare estate will be reflected in the LDP27. In accord with the Place Principle, opportunities to share premises with other organisations will also be considered through the preparation of the LDP27.

Moray Transformation Projects – Dr Gray's Hospital and Home First

The Moray Transformation Programme Board (MTPB) in a non-statutory body that has been set up by NHS Grampian and HSC Moray to deliver two local transformation projects in health and social care:

- *Dr Gray's Hospital Transformation Programme*: Dr Gray's plays an important role in serving the people of Moray, Grampian and the North of Scotland. The programme is to set out a range of sustainable services that can, and should, be delivered at Dr Gray's as a General District Hospital. NHS Grampian are in discussion with NHS Highland to develop relationships to transform and continue current services. Strong links with Aberdeen Royal Infirmary (ARI), Aberdeen Maternity Hospital and Aberdeen Children's Hospital will continue to be built on. NHS Grampian adopted A Plan for the Future – Dr Gray's Hospital 2023-33 in June 2022. Work on a Dr Gray's Development Plan is progressing with a range of stakeholders including Moray Council. This will provide a plan for managing change across the site over the next 20 years and identifies facilities and services that can perhaps be relocated in a planned way to relieve pressure on the current Dr Gray's Hospital site. The spatial implications of this Plan will be reflected in the LDP.
- *Home First*: A strategic priority for the Moray Integration Joint Board (IJB) which is responsible for the planning and commissioning of health and social care services delivered through Moray HSCP. This project is based on the ethos that 'a person's own bed is often the best bed' and that people will recover better and faster at home. The programme aims to reduce admissions to long-term care, avoid unnecessary hospital admission and

attendance, support early discharge and reduce long-term care demand. The LDP can support this project through ensuring there is a supply of accessible, wheel-chair standard housing available within both the private and affordable housing markets. Accessible and specialist housing is covered in Schedule 8b.

Primary Care Premises – Medical Practices, NHS Dental Chairs and Community Pharmacies

NHS Grampian monitors the capacity of facilities through patient registration and space requirements (set out in the Scottish Government Premises Directions and Scottish Health Planning Notes) to determine whether existing facilities require expansion or new facilities are needed to cope with increased demand from new development. It is important to note that the floorspace allowances within the Premises Directions do not take account of all the additional services the practices are expected to provide in accord with the 2018 General Medical Services (GMS) Contract. This informs, and is informed by, the NHS Grampian Asset Management Plan and PCP Strategies and Plans.

Medical Practices

The following medical practices are currently working at, or beyond design capacity in Moray:

- **Elgin Housing Market Area (HMA)**
  - Maryhill (Elgin)
  - Linkwood (Elgin)
  - Fochabers (Fochabers)
  - Moray Coast (Lossiemouth)

- **Forres HMA**
  - Varis (Forres)
  - Culbin (Forres)

- **Keith HMA**
  - Keith Health Centre (Keith)

- **Speyside HMA**
  - Aberlour (Aberlour)
  - Rinnes (Dufftown)

Whilst the 2 medical practices in the Buckie HMA (Ardach and Seafield and Cullen) are currently operating within their design capacity, NHS Grampian and HSC Moray have identified that additional space may be required in the future due to population/development growth.

New premises require to be identified in Fochabers and Keith as there is no space within the current sites for expansion. Further consideration is also being given to the expansion of services within Elgin. These are priorities in the Asset Management Plan. The plans will be informed by the NHS Grampian PCP Plan. Any spatial implications arising from the Strategy and further healthcare infrastructure required to accommodate the growth set out in Schedule 8a will be reflected in the LDP27.

NHS Dental Chairs and Community Pharmacies

NHS Grampian have identified that the following NHS dental chairs and community pharmacies will be required to accommodate growth in the HMA's below:

Elgin - 5 dental chairs + 1 community pharmacy

Forres - 2 dental chairs + reconfiguration of existing pharmacy outlets

Speyside - 1 dental chair

NHS Grampian Property team along with HSC Moray are currently working with dental and pharmacy colleagues to review the dental and pharmacy requirements and delivery. Any spatial implications arising from this review and further healthcare infrastructure required to accommodate the growth set out in Schedule 8a will be reflected in the LDP27.

Infrastructure First Approach for Healthcare and Developer Obligations

NHS Grampian and HSC Moray work closely with Moray Council Strategic Planning and Development to deliver, as much as practically possible, an infrastructure first approach to healthcare infrastructure in Moray, and develop and maintain a robust evidence base to gather development obligations. NHS Grampian and HSC Moray play in important role in the LDP Delivery Group.

Where necessary, NHS Grampian identify an appropriate intervention and the associated developer obligation to be sought from an applicant to mitigate the impact of their development on the facility and resultant service. The developer obligation can be financial and/or land or property depending on the mitigation required. Sites that will be expected to contribute to healthcare infrastructure is currently set out in the LDP 2020 and associated Developer Obligations Supplementary Guidance.

The delivery of larger extensions to existing premises or new medical facilities relies on Scottish Government funding along with developer obligations. All NHS Boards are required by the Scottish Government to follow a standard process in the development of all infrastructure and investment programmes and projects. Therefore, it can take several years to complete the various stages of this process and for funding to be identified. The funding mechanism has significant ramifications for the infrastructure first approach to healthcare facilities.

Developer obligations are time constrained as the majority are to be spent within 15 years of the date they have been received in Moray. Any delay in committing funding can increase the risk of developer obligations having to be paid back to the developer, and further funds from the public sector having to be sourced to fill the gap.

Both of the above matters and the implications for an infrastructure first approach to healthcare have been raised by NHS Grampian with the Scottish Government.

SPORT AND LEISURE

Sport and leisure assets can be both natural and built. Natural assets include walking and cycling trails, water-based activities such as sailing and kayaking, and parks/open spaces for informal recreation. Built assets includes multi-purpose indoor sport and leisure facilities which can host swimming pools, fitness suites, and sports halls, specialist facilities such as ice rinks, climbing walls, bowling greens and outdoor built and leisure environments such as tennis courts, golf courses, athletic tracks and synthetic turf pitches. Built assets are owned and/or managed by a wide range of public, private and voluntary sector organisations.

The benefits of physical activity and sports participation are well known and include helping to prevent and treat non-communicable diseases such as heart disease, stroke, diabetes, and cancer as well as supporting mental health and social connections. The LDP27 will ensure that existing sports and leisure assets are protected, and that new infrastructure is identified to support the health and well-being of both existing and new residents.

Infrastructure planning for sports and leisure will be primarily informed by the Moray Sports and Leisure Strategy Capital Investment Plan 2022-32 which is currently being prepared by Education Resources and Communities Services with input from SportScotland. The purpose of the Investment Plan is to set out a strategic planned approach to sport and leisure capital development and investment in Moray focusing on major capital sport or leisure facilities that Moray Council has direct or connected responsibility for. The SportScotland Facility Planning Model report which will contribute towards the Plan provides an assessment of the relationship between the likely demand

for sport facilities in an area and their supply. This Plan and Model will help to inform the future sports and recreation infrastructure to be planned for Moray over the LDP27 period and beyond, and opportunities for funding including developer obligations and local priorities. However, the planning of Moray Council assets in the LDP27 will be largely determined by the available budget. The planning of non-Moray Council assets will be informed through consultation with the relevant groups/organisations/facilities and credible investment plans.

UTILITIES

Water and Waste Water

Scottish Water (SW) have a requirement to identify and provide new strategic capacity for water and wastewater to meet demand of all new housing development and the domestic requirements of commercial and industrial development. Factors such as the total number of proposed developments, their scale and their distance from the treatment works may impact on SW's ability to service them and therefore there is the potential that future growth investment may be required.

SW model scenarios for future growth based on local authority-provided housing development planning data and Scottish Government population projections. The model calculates expected future population at each water and wastewater treatment works across Scotland. When the demand for water or wastewater capacity exceeds the remaining available capacity at a treatment works then investment is required to investigate this and to understand the level of risk to service existing customers when connecting new developments to the network. Whilst the need for growth investment may be identified through this modelling work, SW will only invest once they are confident that the development is committed.

The capacity maps provide a high-level snapshot of current capacity (October 2023) of SW treatment works for initial screening and development planning purposes in Moray. The Water Treatment Works (WTW) and Wastewater Treatment (WWTW) that currently have capacity (as of October 2023), for growth are set out below. All other treatment works have the potential for future investment to facilitate development, which is a matter that will be addressed between SW and the developer separately.

Water Treatment Works (WTW)
- Glenlatterach - serves Glenlatterach, Pluscarden, Rafford, Forres, Whiteinch, Alves, Newton, Burghead, Cummingston, Muirton, Elgin West and New Elgin
- Badentinian - serves Lossiemouth, Lochhill, Garmouth, Mosstodloch, Elgin East and Fochabers
- Herricks - serves Keith, Drummuir, Newmill and Aultmore

Waste Water Treatment Works (WWTW)
- Moray West PFI – serves Elgin Lossiemouth, Hopeman and Burghead
- Moray East PFI – serves Cullen, Portknockie, Findochy, Buckie and Portgordon
- Archiestown WWTW – serves Archiestown.

Private water supplies and foul drainage will only be permitted in exceptional circumstances (e.g. a lack of capacity or existing drainage problems within the area). This matter is not addressed through NPF4 policy, and a tailored approach will be considered for the LDP27. The site checklist criteria will verify whether developments are located in close proximity to the mains supply to avoid the need for private facilities.

Gas

Infrastructure planning for the gas network is largely reactive as capacity cannot be pre-booked. Where the existing infrastructure would not meet the requested capacity of a new site, reinforcement

would be required. Under the Scottish Government's New Heating Standards legislation, as of 1st April 2024, new domestic and commercial properties which require a building warrant can no longer install gas boilers.

The cost of any reinforcement would either be met by Scottish Gas Networks (SGN), or in part or in full by the customer, dependant on an economic test being applied to the project. The economic test calculates transporter income against the reinforcement outlay to determine whether the reinforcement would be profitable in the longer-term. This is a commercial decision/transaction which does not involve the Council.

SGN are working to modernise the network by replacing all metallic mains that are within 30 meters of a property with plastic. The target for completion is 2030. Projects are currently being scoped and designed, and it is possible that work of this regard will be carried out within the Moray area. This is unlikely to have spatial implications for the LDP27 as the retrofit work will be carried out under SGN's statutory powers.

Most developments will connect to downstream low-pressure infrastructure. Several reinforcements have been designed on the medium pressure network. Currently capacity is most constrained on the medium pressure network around Keith. Forres has capacity, although this is slightly limited. Elsewhere, the medium pressure network is robust. At the moment, the designed projects below are not required and would only go ahead if capacity requests on the network required so. As above, these projects are unlikely to have spatial implications for the LDP27. The projects are:

Location	Details
Forres	195 meters of reinforcement, parallel to main SE of Waterford Farm. Requirement dependant on load build-up of sites.
Forres	155 meters of reinforcement, parallel to existing main at 303654, 859453. Requirement dependant on load build-up of sites.
Elgin	1600m of reinforcement parallel to existing main: from 323021, 864058 to 322625, 862658. Requirement dependant on load build-up of sites.
Buckie	Either upgrading the capacity of the District Pressure Governor at Rathven, or 44 meters of reinforcement.
Buckie and to east of Buckie	6900 meters of reinforcement starting around 344111, 865699 and running north-east, parallel to existing main to Portknockie.

Electricity

Moray is located within the Grampian region of Scottish and Southern Energy Network (SSEN) distribution network. SSEN are currently working to transform and future proof the electricity network to enable legislated Net Zero targets. For example, the National Grid Energy Systems Operator (ESO) Future Energy Scenarios (FES) estimate that (winter) peak demand will be 123-147 GW in 2050 to deliver Net Zero compliance. This is more than double current (winter) peak demand which is 58.3 GW. SSEN Transmission are currently working to expand and upgrade the national transmission grid as part of an accelerated programme of works in the north of Scotland to meet the additional capacity needs within the grid to facilitate new renewable energy generation in the national grid system to enable Net Zero targets to be met.

The ESO Pathway to 2030 sets out projects for electricity transmission network infrastructure required to deliver the forecasted growth in renewable electricity across the UK. Within Moray, the upgrade projects include a new Beauly to Peterhead via Blackhillock and New Deer 400kV overhead line and a 400 kV Blackhillock 2 substation. Public consultation took place in April 2023 with a summary of the responses published in November 2023. Moray Council have been consulted on both proposals. Following the consultation SSEN Transmission have revisited the location of the 400kV substation, and this will now be located to the southeast of Keith. This means the new substation is situated within the Aberdeenshire Local Authority boundary. The overhead line route will be revised to the new proposed substation location.

NPF4 promotes national developments including the Strategic Renewable Electricity Generation and Transmission Infrastructure. The Keith and Blackhillock areas are coming under increasing development pressure, on a piecemeal basis, from development that supports the National Grid. Moray Council recently approved a Keith Green Energy and Infrastructure Framework to make best use of the surrounding land and appropriately control opportunities arising from renewables associated with grid infrastructure and energy systems/storage in order that proposals are plan-led as advocated by the Scottish Government. Moray Council will continue to engage with SSEN on future grid infrastructure projects and this will be reflected in the LDP 27. Energy development including the growing pressures Moray is experiencing for renewable energy developments such as anaerobic digestion plants, solar arrays, windfarms, battery energy and storage systems (BESS), and data centres is addressed further in Schedule 5.

For developer-led projects, SSEN Transmission have a legal responsibility to connect developments to the electricity network and capacity cannot be pre-booked by the developer(s). For example, SSEN Transmission are currently building a 24km connection between Elchies (Rothes 3) windfarm (where the electricity is generated) to Blackhillock (where it is converted and distributed). The windfarm is developer-led and SSEN have a legal responsibility to connect this to the substation for distribution into the grid, which initiated the project for a 24km connection. The cost is a matter addressed between the utility organisation and the developer, and is either met by the utility organisation, or in part or in full by the developer. This means that SSEN Transmission are reactive to development proposals, and it is difficult to forward plan and apply an infrastructure first approach to this element of the operator's business.

DIGITAL

The Reaching 100% (R100) is a programme to enable access to superfast broadband with speeds of at least 30 Megabits per second (Mbps) to all homes and businesses in Scotland. The programme is funded via the UK and Scottish Government's and BT (the contract delivery partner). The R100 contract for the North was signed in December 2020 and overall contract build is currently expected to be complete 2027-28. The contract build is currently underway and live in all contract areas. The Scottish Broadband Voucher Scheme (SBVS) is available for homes and businesses to access superfast broadband where no contract or commercial build is scheduled. A subsidy of up to £5000 is available to all eligible premises and covers direct installation costs carried out by a registered supplier. The scheme is available to homes and businesses in parts of Moray such as the Cabrach.

The R100 programme relies on fibre optic cables from properties to the exchange and availability and/or capacity at the exchange. The availability or capacity at an exchange is a commercial matter. However, the LDP 27 can ensure that the infrastructure is installed so that new homes and businesses can be served by superfast broadband should this become available in their area. Whilst NPF4 policy 24 Digital Infrastructure supports the delivery of digital infrastructure, it is considered that a tailored approach is required to explicitly set out what will be required from applicants to deliver the ambitions of the R100 programme and facilitate economic growth in Moray. This is a similar approach as the adopted LDP 2020 Primary Policy 3 Infrastructure and Services. Similarly, consultation with BT and

Highlands and Islands Enterprise (HIE) will inform whether sites and/or routes require to be safeguarded through the LDP27 for future exchanges and associated equipment.

Moray Council will be recruiting a digital project officer in early 2024. The post will work with digital infrastructure providers such as BT, HIE and communities to deliver the R100 programme and SBVS across Moray. Any associated spatial implications arising from the physical infrastructure necessary to implement the roll out of R100 will be reflected in the LDP27.

WASTE

NPF4 Policy 12 Zero Waste seeks to encourage, promote and facilitate development that is consistent with the waste hierarchy to reduce, reuse and recycle materials. The Council has a key role in delivering the necessary infrastructure in the right locations to achieve ambitious targets for reducing waste and increasing recycling.

The Scottish Government previously set a 60% household recycling target by 2020, and an all-waste recycling target of 70% by 2025. Scottish household recycling rates grew by an average of 9% per year between 2005 and 2010. However, in more recent years progress has slowed.

Waste Management Facilities

Despite the Council's best efforts to reduce residual waste through minimisation campaigns, recycling, composting and use of other treatments, a substantial quantity of residual waste that is generated still needs to be collected and treated. Biodegradable Municipal Waste (BMW) cannot be landfilled after 2025 due to the Scottish BMW landfill ban. This was originally meant to come into force in 2021 but later deferred due to lack of capacity in alternative treatment methods.

Since mid-2023, the Council's non-recyclable waste has been processed at the NESS Energy from Waste (EfW) facility alongside waste from Aberdeen City Council and Aberdeenshire Council. In terms of identification and investment in additional waste management facilities there are no plans to invest in new waste management infrastructure in the short to medium term.

The Council continue to operate the landfill site at present. Low levels of waste are currently being accepted by the Council from private sector waste producers. A decision has been made to begin the final capping and reinstatement procedures in 2024/25 as per conditions set by SEPA as the regulator.

Recycling Centres and facilities

The Council offers extensive kerbside recycling service for wastepaper and card, glass and tins and specific plastics alongside garden and food waste. There are currently 5 recycling centres located with Moray's main towns and 22 recycling points across the area in the smaller towns and villages and rural areas.

Figures released by Scottish Environmental Protection Agency (SEPA) in the annual return showed households in Moray sent 57.8% of their waste to be recycled in 2022. The Council is top of the list for recycling rates nationally. The rate, which is recorded from kerbside collections and waste recycled at Moray's recycling centres, is up from 52.21% the previous year. The Council has implemented all the easier and most cost-effective measures to increase recycling rates. Given current budgetary pressures it is proving difficult to make a viable business case for further investment and successfully bid for Scottish Government funding. There are no short to medium term investments plans to support an increased recycling rate.

Spatial Implications

The Council's non-recyclable waste is no longer being landfilled and is being processed at the NESS energy from waste plant in Aberdeen. There are no plans for the identification or investment in additional waste management facilities in the short to medium term. The Council currently has the

highest recycling rate in Scotland, however all the easier and cost-effective measures to support recycling have been implemented already. Significant investment is needed to further increase recycling rates and it is proving difficult to develop viable business cases to attract Scottish Government funding. Moray Council will continue to monitor waste trends and ensure any emerging requirements for new waste management facilities or expansion of existing are identified early and fed into the LDP27.

CEMETERIES

There are 63 cemeteries and churchyards currently managed by Moray Council. The Council has maintained these over the years and systematically built new cemeteries or extended existing cemeteries based on location as opposed to long term need based on changing centres of population.

As a result of that approach there are cemeteries that have limited remaining new lair space available and now need to be extended or a new site identified and developed. In 2018 the average annual lair usage in Moray over the previous five years was 242 for new lairs, 337 lair re-openings for second or third interments and 97 cremated remains.

Moray Cemetery Provision Strategy 2018

A Cemetery Provision Strategy was developed by Moray Council in 2018 setting out a long-term sustainable approach to investment in cemeteries. The strategy identifies the remaining lair capacity in years based on average lair sales per cemetery over recent years. It seeks to ensure an adequate supply of burial space, to guide future planning and management of cemeteries in a co-ordinated, pro-active, and sustainable way.

The strategy identifies three cemeteries for investment over a ten-year period. Cemeteries at Keith and Lossiemouth are earmarked as requiring extensions. In Elgin, a new cemetery site is needed as the strategy estimated the lifespan of the existing cemetery in 2018 was 6 years. The priority is to deliver a new cemetery site in Elgin and preparatory work for this is underway. Based on targeting resources to deliver the new site in Elgin there are no short-term plans in progress at this stage to expand provision in Lossiemouth (11 years capacity in 2018) or Keith (13 years capacity in 2018). The Moray Local Development Plan has allocated land for the expansion of both cemeteries. The expansion of Lossiemouth cemetery is subject to intrusive ground investigation required to demonstrate suitability.

Considerations impacting on cemetery provision

There are alternative options that may impact on cemetery capacity. In Scotland in 2016 approximately 68% of the total number of deaths were cremated. In Moray in 2016, approximately 51% of the total numbers of deaths were cremated. Discussion with various stakeholders indicates that the variation in Moray from the national trend is primarily due to a large fishing and agricultural population who traditionally prefer burial. There are currently four crematoria in and around Moray. Moray Crematorium, near Buckie (privately owned), Inverness Crematorium, on (owned by Highland Council), Aberdeen Crematorium (owned by Aberdeen City Council). A small local crematorium in Burghead (privately owned) has been operating since 2019.

In terms of natural burial (sometimes referred to as green or woodland burial) in 2018 there were four privately owned facilities available for natural burial in and around Moray at Wilkies Wood-Findhorn, Cothiemuir Hill- Alford, Delliefure near Grantown-On-Spey and Clovery Woods-Fyvie.

If there is a significant shift in Moray from traditional burial, then this will extend the lifespan of existing cemeteries and give longer lead times for the development of new sites.

Spatial Implications

The Council has a Cemetery Provision Strategy that was developed in 2018. The data underpinning the assumptions within it needs to be updated to ensure that the projections for expansion of identified cemeteries is still valid and to review whether there has been an increase in cremations or natural burials that would impact on future provision. It is anticipated that an update of the strategy will be undertaken in 2024/25. Any spatial implications in term of cemetery expansions etc. will be reflected in the LDP27.

MINISTRY OF DEFENCE

Moray is home to two military bases, Kinloss Barracks and RAF Lossiemouth. These are important defence bases and play a key part in Moray (culturally, economically, and socially). Both Kinloss Barracks and RAF Lossiemouth are subject to safeguarding consultation zones. Development proposals within some use classes within safeguarding distances of the facilities require to be subject to consultation with Defence Infrastructure Organisation. The safeguarding zones apply to a wide range of development proposals which could have implications for the operation of military facilities and includes aspects such as height of buildings/ structures, use of reflective surfaces, refuse tips, nature reserves and other proposals which might attract birds. Proposals must not adversely impact on military operations or capability. MLDP2020 policy EP15 is specifically related to Ministry of Defence Safeguarding to ensure the impacts on the bases are considered. Through the Call for Ideas the Defence Infrastructure have noted the retention of this policy would be welcomed. In addition to the safeguarding consultation zones noise impacts from the air base is an important consideration for development proposals. The Military Aviation Noise Contour Programme and associated noise contours are therefore taken into account when considering development proposals.
The needs of service personnel and their families in terms of housing has been considered within Schedule 8b Specialist Housing and is also a consideration for education, health and other services which are discussed within this schedule.

Summary of Stakeholder Engagement

- Local authority education, sport and leisure, transport, waste and housing colleagues. Council Services were integral to drafting the summary of evidence and their comments on the finalised schedule and review of stakeholder responses have been incorporated.
- NHS Grampian and Moray Health and Social Care Partnership – NHS Grampian and Moray HSCP have provided a joint Statement of Agreement with some minor comments which are included in the Statement of Agreement section.
- Utility providers – Statements of Agreement have been received from Scottish Water, SGN and SSEN Transmission and SSEN Distribution. SGN and SSEN Transmission have provided factual updates which have been incorporated into the Schedule. SSEN Distribution have provided further information and additional evidence document/links which is included in the Statement of Agreement section. SGN has provided additional evidence which is included in the Statement of Agreement section.
- Representative bodies of housing providers and landowners – Homes for Scotland have identified an area of agreement and areas of dispute. These are provided in the Statement of Agreement and Dispute sections along with the Council's response. No response has been received from Housing Associations.
- Sport Scotland – Sport Scotland have provided a Statement of Agreement with additional comments which are provided in the Statement of Agreement section.
- Highlands and Islands Enterprise (HIE) – No response received.

Summary of Implications for the Proposed Plan

For the LDP27, it is proposed to:

- Consider a tailored approach to provide clarity on the types, level and location of infrastructure necessary to support development and the sites that will be expected to contribute via developer obligations. This provides clarity and certainty to the development industry and communities as to what infrastructure is be provided to support growth.
- As far as practically possible, identify how, when and by whom infrastructure will be delivered and priorities. The balance between the level of information provided within the LDP, Delivery Programme and associated planning guidance will be considered during the preparation of the Proposed Plan. The timeframe for review will influence this (e.g. rates, exemptions, etc. may be more suited to planning guidance given this can be updated quicker to reflect changing local circumstances, inflation, etc.). This will be informed by the LDP Delivery Group and other key infrastructure stakeholders.
- Where necessary, set out the spatial implications of infrastructure to support development (e.g. safeguard land for a new school or healthcare facility) within the Proposed Plan, and engage with key infrastructure providers to identify opportunities for sharing resources, for example via community hubs.
- The new LDP must consider the implications of the Defence Infrastructure Organisation Consultation Zones when reviewing development sites and also consider if policy EP15 requires to be retained to ensure impacts on the military bases are considered.

Statements of Agreement

SCOTTISH GAS NETWORKS (SGN)

SGN are in agreement with the sufficiency of the evidence provided within the schedule. They have provided the additional information below which the Council are agreeable to including as further evidence to inform the LDP27. The implications for the LDP27 are that there will likely be a requirement to route new hydrogen pipeline infrastructure through Moray, linking hydrogen production (Cromarty, Speyside, etc.) to users whether domestic or industrial and commercial. This will need a specific corridor and would be assessed under a pre-FEED study, as SGN are currently working on with H2 Caledonia.

SGN own and operate the gas distribution networks in Scotland and the South-East of England, suppling energy to 5.9 million homes and businesses through over 74,000km of pipeline infrastructure. The UK Government has legally committed to reducing greenhouse gas emissions to net zero by 2050, with the Scottish Government committing to the same reduction by 2045. As part of this transition to net zero, demand for unabated natural gas must be phased out and replaced by low carbon and ultimately renewable energy sources. This will require the transition of natural gas connections to low carbon alternatives. SGN are working in collaboration with the other gas networks to provide evidentiary support for UK Government's 2026 heat policy decision about hydrogen's future role in home heating to support Net Zero. SGN are undertaking an extensive programme of R&D, demonstration, and trial projects to prepare for and enable the system transition of the gas networks to 100% hydrogen. These projects include the Local Transmission System (LTS) Futures Programme[1] and H100 Fife[2] hydrogen neighbourhood. LTS Futures will research, develop, test and evidence the compatibility of LTS assets, pipelines, associated plant and ancillary fittings with hydrogen – this is important as the LTS consists of high-pressure pipelines that distribute gas directly to industry and feed the lower pressure gas networks that are used by homes and businesses. H100

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[1] https://www.sgn.co.uk/about-us/future-of-gas/lts-futures
[2] https://www.h100fife.co.uk/

is a world-first demonstration that will bring 100% green hydrogen gas to provide clean heat to around 300 homes in Buckhaven and Denbeath.

In addition, in preparation for the conversion of the gas networks in Scotland to 100% hydrogen, SGN has a number of system transformation projects which are developing the plans, roadmaps, and infrastructure requirements. In Dumfries and Galloway, SGN are investigating the potential for green hydrogen production from curtailed renewable generators and its implications for new hydrogen infrastructure and the repurposing of existing gas assets in the southwest of Scotland. In North East and Central Scotland we have a pre-FEED project, H2 Caledonia, which is designing and routing new hydrogen transmission pipelines to connect hydrogen production, storage and network injection locations. These new pipelines would form a hydrogen backbone, providing the hydrogen required to support the phased conversion of gas distribution networks which would ultimately allow for hydrogen use in a domestic setting (as seen in H100 Fife). H2 Caledonia's Pre-FEED project and its future FEED phase, represent the technical and commercial development of SGN's hydrogen rollout strategy, which is aiming to demonstrate and ensure the timely delivery of the system transformation to hydrogen once the required policy decisions are made.

SSEN DISTRIBUTION

SSEN Distribution are in agreement with the sufficiency of the evidence base and have asked for the following additional information to be considered:

- As the rate of decarbonisation accelerates, SSEN is taking a more strategic view to our network development process to meet the requirements set out in our Distribution Future Energy Scenarios (DFES). This annual publication models how load on our network may evolve in four development scenarios out to 2050.
- Distribution Future Energy Scenarios: 2022 reports available here: SSEN Distribution Future Energy Scenarios - Regen; 2023 reports available April 2024
- Network Development Plans: Network Capacity Information - SSEN
- NeRDA (Near Real-time Data Access portal): Near Real-time Data Access (NeRDA) portal - SSEN
- Open Data Portal: SSEN Distribution Data Portal

SPORTSCOTLAND

SportScotland are in agreement with the sufficiency of the evidence base. They have provided additional comments, information and a data source below. The Council will include school facilities within their sport and leisure evidence base for the LDP and will use the MySport application to source club and facility data to engage with relevant groups to inform the LDP.

For 'sport and leisure' the evidence base includes reference to:

- Moray Sports and Leisure Strategy Capital Investment Plan 2022-32
- SportScotland Facilities Planning Model
- Consultation with groups involved in non-Moray Council assets.

We support these inclusions, and in particular highlight the importance of consultation with sport clubs and communities within the Council area.

School facilities in Moray will be contributing important spaces for community sport outwith curricular use and should feed across to the 'sports and leisure' evidence base.

SportScotland holds clubs and some facilities data as part of our 'MySport' application available through our website should this be of use to LA partners: https://mysport.sportscotland.org.uk/

HOMES FOR SCOTLAND

The summary of implications section states the following:

"Consider a tailored approach to provide clarity on the types, level and location of infrastructure necessary to support development and the sites that will be expected to contribute via developer obligations. This provides clarity and certainty to the development industry and communities as to what infrastructure is be provided to support growth."

This is a reasonable approach in principle. It will be important that practical and viable solutions are designed, informed by discussions with the relevant stakeholders.

Statements of Dispute

HOMES FOR SCOTLAND

Healthcare

The information provided on healthcare would benefit from better referencing and improved levels of detail.

Pages 11 and 12 of the PDF identify *"medical practices* [that] *are currently working at, or beyond design capacity in Moray:"*. However, it is not explained where this information is sourced from nor is information provided on the number of patients relative to capacity or how the capacity figure has been calculated. As such it is not possible to understand how these conclusions have been reached or the scale of any exceedance of capacity.

Similarly, there are conclusions further down on pdf p. 12, as follows *"Grampian have identified that the following NHS dental chairs and community pharmacies will be required to accommodate growth in the HMA's below:"* this should either cross refer to where this detailed evidence is contained or include it within the proforma. It's important that evidence for any such conclusions and the assumptions they rely on are clearly set out so the evidence can be understood.

Council Response: *As set out in the Schedule, NHS Grampian monitors the capacity of facilities through patient registration and space requirements to determine whether existing facilities require expansion or new facilities are needed to cope with increased demand from new development. The detailed breakdown Homes for Scotland are seeking cannot be provided for confidentiality reasons. It is on this basis that Moray Council consider the information presented to be a sufficient evidence base.*

Education

The information provided on education would benefit from further explanation of the evidence and assumptions used.

We disagree with the assumption of an 80% working capacity for primary schools. This is lower than the level used by other local authorities we are familiar with and has not been justified. There are many primary schools across Scotland which operate comfortably above this proportion and indeed Secondary Schools which can operate at above 90% of planning capacity. The reasons for choosing these thresholds and associated evidence should be set out. Consideration should also be given to the period of time which schools are projected to exceed their perceived working capacity.

Council Response: *As set out within the Developer Obligations Supplementary Guidance the threshold for primary schools is for planning not working capacity. This threshold was consulted upon through the review of the Developer Obligations Supplementary Guidance in 2019. The research that informed this threshold illustrated that 80% planning capacity equated to 90% working capacity for the majority of primary schools. Planning capacity is considered to be a more appropriate method to assess impact as it fluctuates less than working capacity, which can change on an annual basis. Any changes to*

capacity thresholds will be addressed through subsequent reviews of the supplementary guidance which will be subject to public consultation. This allows for regular reviews to be undertaken to reflect local circumstances and changes in Council policies and strategies, that cannot wait for a 10-year LDP review. It is on this basis that Moray Council consider the information presented to be a sufficient evidence base.

The document lists the 2022 school roll projections of evidence. However, we note that previous school roll projections have significantly exceeded the actual school rolls as the table below indicates. Primary roll forecasts have been 16% to 19% higher than actual rolls by the end of the full forecast period. There is a lower but still substantial exceedance for secondary schools, which are generally easier to project. The table below compares the 2014, 2015, 2016 and 2019 projections against recorded school rolls in 2023.

	Difference between projected rolls and actual roll*									
Projection	2015	2016	2017	2018	2019	2020	2021	2022	2023	% over in final year
2014 PS	53	156	381	587	715	889	1096	1319		19%
2014 HS	-12	89	97	297	379	408	438	580		11%
2015 PS		-1	205	386	448	518	646	804	1071	16%
2015 HS		85	73	271	311	319	304	399	541	10%
2016 PS			18	216	335	467	655	845	1086	16%
2016 HS			18	200	196	189	172	257	436	8%
2019 PS						75	190	226	359	5%
2019 HS						-19	-3	99	196	4%
* Positive number indicates projections were higher than the actual roll, negative lower										

In light of this, it would be helpful if more information could be provided to explain the assumptions underpinning the school roll forecasts and a step-by-step guide to the methodology which has been used. Furthermore, the Council should explain how it has accounted for the sharp decline in birth rates over the past decade in its projections and the pupil product ratios it uses.

Council Response: *The School Roll Forecast document sets out the methodology for calculating the school roll. The methodology and assumptions made are a decision for the Education Authority and the role of the planning system is to address the spatial implications arising from this. As set out in the SRF methodology, birth rates are based on projections provided by the National Records of Scotland (NRS) and the limitations of forecasting due to unknown external factors are acknowledged in the document. It should be noted that house build completions can play a significant role in the SRF, particularly where annual completions are under or overestimated by housebuilders. Pupil product ratios are addressed in the Developer Obligations Supplementary Guidance. It is on this basis that Moray Council consider the information presented to be a sufficient evidence base.*

Summary of Implications

This following section of the summary states the following:

"As far as practically possible, identify how, when and by whom infrastructure will be delivered and priorities. The balance between the level of information provided within the LDP, Delivery Programme and associated planning guidance will be considered during the preparation of the Proposed Plan. The timeframe for review will influence this (e.g. rates, exemptions, etc. may be more suited to planning guidance given this can be updated quicker to reflect changing local circumstances, inflation, etc.). This will be informed by the LDP Delivery Group and other key infrastructure stakeholders."

One of the purposes of the recent planning reform was to front load the system and deliver greater certainty of delivery. This passage reads as if the intention may be to delay publishing key information which will impact upon viability until after the LDP has been adopted. It is understandable that some details may be revised over the course of a 10-year LDP. However, this does not preclude the LDP from setting out clear details at the outset rather than deferring these to a later date and leaving question marks over the potentially deliverability of sites.

Council Response: *The LDP will provide as much certainty as practically possible on infrastructure required to facilitate development, however as set out in the Schedule there are factors outwith the control of the Council and other infrastructure providers that will dictate delivery and priorities. Given the 10-year timeframe for the LDP it is considered that planning guidance will be a more appropriate means for some information as this can be updated on a more regular basis to reflect local circumstances. It should be noted that the Council offers a free developer obligation assessment service where developers are encouraged to engage with the planning authority at the earliest opportunity to ascertain the likely level of developer obligations that will be required for a development proposal so that this can inform development appraisals and the purchase price of land. It is on this basis that Moray Council consider the information presented to be a sufficient evidence base.*

Issue: Topic / Place	10b. Transport

Information required by the Act regarding the issue addressed in this section	The Town and Country Planning (Scotland) (Act) 1997, as amended:
	
	• section 15(5)(d) The infrastructure of the district (including communications, transport and drainage systems for the supply of water and energy, and health care and education facilities);
	• section 15(5)(e) How that infrastructure is used;
	
	The Town and Country Planning (Development Planning) (Scotland) Regulations 2023:
	
	• Regulation 9(2)(e) The planning authority are to have regard to the following plans and strategies, insofar as relating to the local development plan area:
	    I. The national waste management plan;
	    II. Any regional transport strategy; and
	    III. Any local transport strategy.

Links to Evidence	**Strategies and Reports** **CD078** Moray Council Active Travel Strategy 2022 to 2027 **CD075** Moray Council Active Travel Strategy 2022 to 2027 – Annual Update 2023 **CD107** Moray Council Road Safety Plan to 2030 (draft) **CD108** Public EV charging – Moray Strategy & Expansion Plan **CD109** Moray Hydrogen Strategy **CD110** Elgin Transport Strategy **CD001** Moray Local Development Plan 2020 Volume 1 -Spatial Strategy (page 11) **CD111** National Transport Strategy 2 (NTS2) **CD112** Strategic Transport Projects Review 2 (STPR2) **CD113** A96 Dualling Inverness to Aberdeen DMRB Stage 1 Assessment Report **CD114** A96 Dualling Hardmuir to Fochabers DMRB Stage 2 Assessment Report **CD115** A96 Corridor Review – Stakeholder and Public Engagement Consultation Report (December 2022) **CD116** A96 Corridor Review – Initial Appraisal: Case for Change (December 2022) **CD117** HiTRANS Regional Transport Strategy (Case for Change Report) **CD076** Reducing car use for a healthier, fairer and greener Scotland - A route map to achieve a 20 per cent reduction in car kilometres by 2030 **CD118** Transport and Travel in Scotland 2021: Results from the Scottish Household Survey **Datasets** • Scottish Transport Statistics - All editions • 2011 Census Data Journey to Work and Car Ownership – Moray Data • 2011 Census Data Mode Share for journeys to work and education – Moray Data

- Pedestrian and Cycle counts from permanent counters on active travel routes within and between settlements in Moray
- 'Hands Up' Scotland Survey for Travel Mode to School
- Bus Services, Routes, Capacity and Utilisation – Local Information
- Rail Services, Capacity and Utilisation (to be supplied by Transport Scotland Mobile Phone Data)
- Traffic counts from permanent counters on roads within and between settlements in Moray
- Traffic counts from permanent counters on Trunk Roads within Moray
- Ad-hoc Traffic Counts undertaken for specific development sites and/or transport schemes
- Traffic counts undertaken in 2023 for the update of the Elgin Traffic Model
- ANPR surveys undertaken in 2023 for the update of the Elgin Traffic Model
- INRIX Data (to be supplied by Transport Scotland)
- LATIS Data (to be supplied by Transport Scotland)
- Moray STATS19 Accident Data
- ChargePlace Scotland - Number and location of publicly available electric vehicle charging points in Moray

National Planning Framework 4 Context

NPF4 Policy 13 seek to encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.

LDPs should prioritise locations for future development that can be accessed by sustainable modes. The spatial strategy should reflect the sustainable travel hierarchy and sustainable investment hierarchy by making best use of existing infrastructure and services. LDPs should promote a place-based approach to consider how to reduce car-dominance. Consideration should be given to the type, mix and use of development; local living and 20-minute neighbourhoods; car ownership levels; the accessibility of proposals and allocations by sustainable modes; and the accessibility for users of all abilities.

LDPs should be informed by an appropriate and effective transport appraisal undertaken in line with relevant transport appraisal guidance. Plans should be informed by evidence of the area's transport infrastructure capacity, and an appraisal of the spatial strategy on the transport network. This should identify any potential cumulative transport impacts and deliverable mitigation proposed to inform the plan's infrastructure first approach.

Summary of Evidence

This section explores the evidence associated with the movement of people and goods in Moray, identifies the information which has been gathered and assessed, and its relevance to the Local Development Plan (LDP). Conclusions are drawn from the information which will inform the approach to be adopted in the review of the LDP.

The Council is committed to undertaking a proportionate Transport Appraisal to support and inform the development of the new LDP. Budget has been allocated for this process and is currently being utilised to update the 2018 Elgin Traffic Model. New traffic counts were undertaken in Elgin during 2023 to inform the update, along with new Automatic Number Plate Recognition surveys. Work is currently on-going to calibrate and validate the updated model. Once this process is completed it will be shared with Transport Scotland.

There are some datasets which are aged or have yet to be obtained from Transport Scotland's sources e.g. 2022 Census Data, Moray specific data from the LATIS model etc. During the preparation of the Transport Appraisal, the Council will work with Transport Scotland to identify and obtain any new relevant data which can be used to inform the appraisal.

Information is also awaited on the outcome of the A96 Corridor Review, which passes east-west through Moray. Once the findings of this review are known, they will be used to inform the Transport Appraisal and the development of the new LDP.

Transport related evidence from public consultation undertaken to date is presented and will be updated as further engagement on the Local Development Plan takes place with both Stakeholders and the Public.

The scope of this evidence is limited to information relevant to land use planning and implications of the evidence for the spatial strategy of the LDP, focussing on significant issues that require to be addressed by the LDP, and what is relevant e.g. the LDP has no influence on the setting of fares for public transport, but does have an influence on where new housing/development is located and how it is designed to enable access to available public transport services.

The conclusions drawn in this section are cross-cutting in nature, reflecting NPF4's policy direction in addressing the climate crisis as an overarching theme, interaction between place and movement and the need to provide infrastructure upfront to support travel behaviour change. Dependant policies are:
- Policy 1 Tackling the Climate and Nature Crisis
- Policy 13 Sustainable Transport
- Policy 14 Design, Quality and Place
- Policy 15 Local Living and 20 Minute Neighbourhoods
- Policy 18 Infrastructure First

Identification of Datasets

Datasets have been identified from work associated with previous transportation studies and strategies, internet searches, data held by Moray Council Transportation, public transport operators, Transport Scotland and nationally available datasets identified through internet searches.

Datasets Considered
Given the considerable body of transport related data and information available, the documents and datasets in the 'Links to Evidence' section above are those deemed most relevant and sufficient to inform the development of the LDP. The focus is on identifying from the evidence where there are land use planning implications for the LDP, and what the spatial strategy for the LDP needs to address in terms of spatial distribution of development and site selection criteria across Moray.

Analysis

Moray is a rural local authority in North East Scotland which has an estimated population of 96,410 (National Record Scotland Mid 2021 Estimate), concentrated around the main towns of Elgin, Forres, Buckie, Keith and Lossiemouth. Secondary settlements are 'daisy-chained' along the river Spey valley (Aberlour, Craigellachie, Dufftown and Rothes) and along the Moray coast to the east of the River Spey (Portgordon, Findochty, Portknockie and Cullen). Beyond the main and secondary settlements there are dispersed villages and rural settlements, along with clusters of individual dwellings within the countryside.

The Map below shows the areas of Moray which fall into the various Scottish Government Urban/Rural classifications and demonstrates the rurality of Moray along with the areas where there are concentrations of population, employment and services.

Scottish Government Urban Rural Classification 2020

1:250,000 @ A3

Legend

SG Urban Rural 2020

- 1 - Large Urban Areas
- 2 - Other Urban Areas
- 3 - Accessible Small Towns
- 4 - Remote Small Towns
- 5 - Accessible Rural Areas
- 6 - Remote Rural Areas
- Moray Outline

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The main towns in Moray are accessed via the Strategic Road Network which includes the A96 (T) Aberdeen - Inverness Road and the A95 (T) Aviemore - Keith Road. The A96 (T) travels east-west across Moray passing through two main settlements, Keith and Elgin, and a number of smaller settlements, e.g. Alves. The A96 (T) also passes close to the settlements of Forres, Lhanbryde, Mosstodloch and Fochabers. The A95 (T), which links Moray to the A9 (T) and the South, is a key transport route for many of Moray's primary industries, e.g. distilleries and food production. The A95 (T) passes through the main settlements of Aberlour and Keith, and close to the settlement of Craigellachie.

Beyond the trunk road network, the main routes of strategic importance within Moray are the A98 from Fochabers to Cullen, the A941 from Dufftown to Lossiemouth and the A940 from Forres to Grantown. The A941 is an important link between Elgin and the surrounding area, including the A95 (T) and the South. To a lesser extent, the A940 is a key route linking the western part of Moray, around Forres, to the A95 (T) and the South. The A98 links Moray with Banff and Buchan and serves the town of Buckie and many smaller coastal communities.

As Moray is a rural local authority, car ownership levels are relatively high (81%) compared to much of the rest of Scotland (69%). (https://www.scotlandscensus.gov.uk/ 2011 census data).

In Transport and Travel in Scotland (TATIS), data from the Scottish Household Survey (2021), shows that 9% of households in Moray do not have a car/van available to them. This is lower than the national rate of 19.7% of households, but to be expected with large rural areas, and even so means more than 3,960 households across the area that do not have access to a car/van.

Data from Scottish Transport Statistics 2022 (shown in the graph below) highlights that since 2004, car ownership per 1000 population has increased, with a slight reduction during 2010 to 2012 when the implications of the global financial crisis during 2008/2009 were still having an economic impact in Moray.
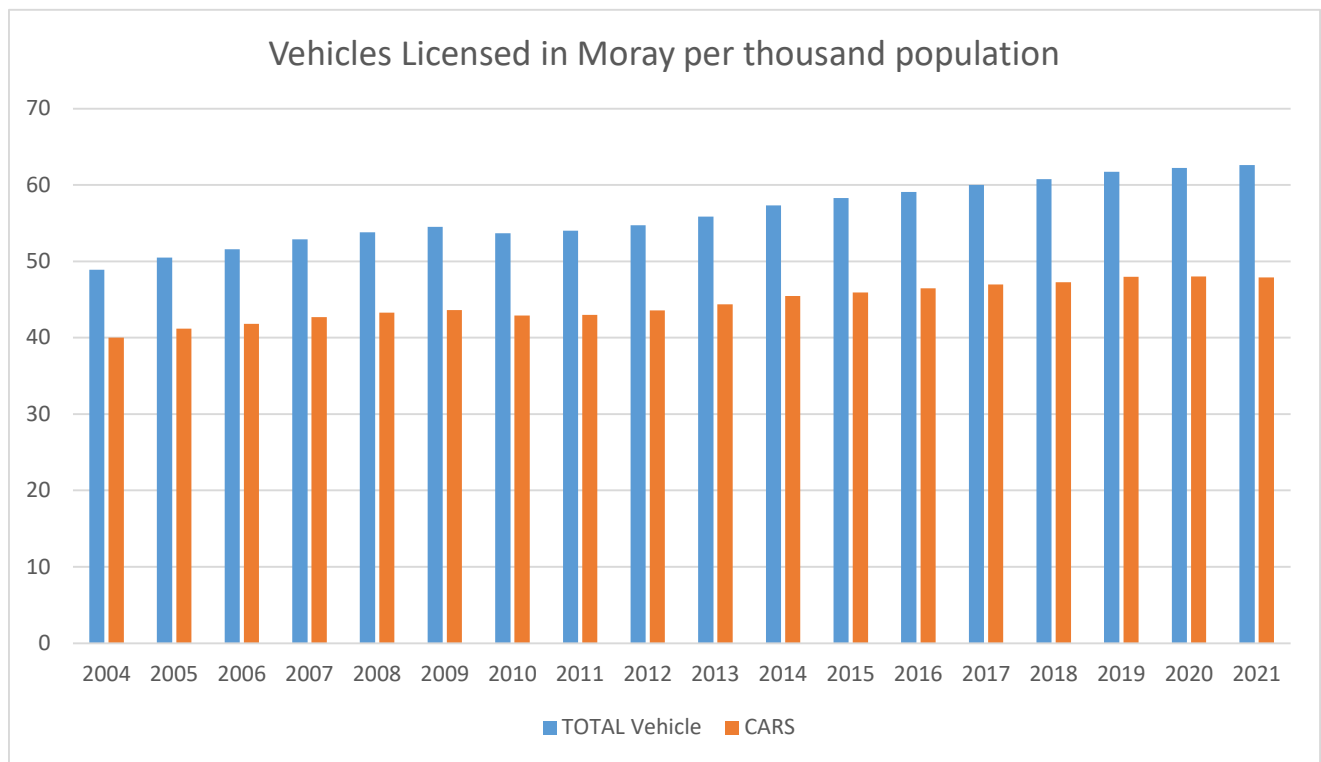
Public Transport- Bus

The rural nature of Moray also impacts on the availability of public transport for outlying areas when compared to other parts of Scotland. Public transport services in Moray are generally focussed on the main settlements of Elgin, Forres, Buckie, Keith and Lossiemouth and along the A96 (T) corridor.

In terms of local bus services, the Scottish Household Survey (2021) shows a high proportion of Moray respondents that had not used a local bus service in the past month – 85%, which compares to a national rate of just 71%. This may in part be due to the low levels of accessibility by public transport in Moray which was presented in the A96 Corridor Review Case for Change (see table below).

Area	Total Population of Area (16+)	Emergency Department Hospital	GP	Higher Education	Large Food Store	Shopping Centre	High School
A96 Corridor Review Transport Appraisal Study Area	456,943	36%	80%	47%	76%	53%	64%
Aberdeen City	193,271	57%	99%	74%	89%	85%	87%
Aberdeenshire	106,556	1%	46%	3%	51%	10%	52%
Moray	79,673	22%	68%	27%	67%	19%	38%
Highland	77,443	46%	88%	58%	87%	68% 6	67%

Accessibility to Key Services by Public Transport in under 30 minutes : A96 Corridor Review_ Initial Appraisal _Case for Change (2022)_Table 5

In order to address public transport accessibility away from the main settlements and A96 corridor, Moray Council operate and are expanding a Demand Responsive Transport service 'mConnect' http://www.moray.gov.uk/moray_standard/page_125954.html The expansion of this service seeks to fill the gaps in provision in rural areas and encourage more people to use public transport.

The key aims of the project are to increase the numbers of people using public transport to get to and from rural areas to places of work, education etc, reduce the number of people facing transport barriers to employment, education, or recreation, and reduce the environmental impact of transport in the area. Services expansion including longer operating hours (including peak hours) will increase mobility and access to work, education, and recreation for all residents regardless of economic status, geography, age or ability. The project seeks to reduce social isolation with particular benefits to groups who are otherwise isolated, notably people who are older, people who are younger, those at home with young children and lower income households.

The current percentage occupation on mConnect services is shown in the table below. Whilst data on the utilisation of commercial services which operate within and pass through Moray has been sought, the operation has not provided this key data. There is therefore currently no data on the capacity of those services. Efforts to attain this data from the commercial operator are on-going and, if obtained, the data will be used to inform the Transport Appraisal and site selection process.

Percentage Occupation of 'mConnect' transport services				
Route	Operator	Annual loadings from Sep 22 to Aug 23	Annual Capacity	% Occupation
Forres Town Service	Moray Council m. Connect	12067	29120	41%
Elgin - Urquhart - Garmouth - Kingston	Moray Council m. Connect	12199	85800	14%
Aberlour - Carron	Moray Council m. Connect	56	5320	1%
Tomintoul - Grantown on Spey	Moray Council m. Connect	699	2912	24%
Keith - Dufftown - Tomintoul	Moray Council m. Connect	631	4368	14%
Elgin - Archieston - Knockando - Aberlour	Moray Council m. Connect	1732	29120	6%

Public Transport – Rail

The Aberdeen to Inverness Railway passes east-west through Moray with stations at Keith, Elgin and Forres. As part of the improvement programme for this railway line within Moray there have been new sections of twin-tracks to enable trains to pass at more locations, including at stations, improvements to signalling, the

extension of platforms at Elgin station and the relocation of Forres Station, which included the closure of the Waterford Road level crossing.

The A96 Corridor Review Case for Change (December 2022) pages 122 and 123 identifies options to be taken forward which include the introduction of rail freight terminals in Keith and Elgin, further line speed improvements to cut journey times, the provision of passing loops to enable more frequent passenger services and enhancing the parking facilities at railway stations between Aberdeen and Inverness with the aim of encouraging the use of low carbon infrastructure for medium and long distance travel along the A96 corridor. As these options are further developed, they will be considered as part of the review of the LDP e.g. safeguarding any land identified for rail freight terminals at Keith and Elgin.

The Council currently does not have access to any data for the use of the stations and rail network within Moray. It is anticipated that data from Transport Scotland may be available in the future to indicate the numbers of passengers using each station.

Active Travel

Moray Council are committed to providing infrastructure to support walkers, wheelers and cyclists. Despite being a rural local authority Moray has relatively high statistics for Active Travel as a 'main mode of travel' than a large percentage of other local authority areas in Scotland *(Moray Council Active Travel Strategy 2022 to 2027)*. Recent data has continued to see increases (when compared to 2019 data) in numbers of pedestrians and cyclists on routes which are monitored in built up areas and on routes which provide connections to settlements in rural areas.

In the past five years 20 kilometres of new all-weather path has been provided along the old Speyside railway alignment (Speyside Way) from the boundary with Highland Council to the south of Cragganmore to Craigellachie, connecting a number of settlements and individual properties along its route to provide access to employment and everyday facilities. An application to the Rural Tourism Infrastructure Fund has been made for the extension of this route to connect Rothes to Craigellachie, along with improvements to the Spey Bay to Portgordon section of the Speyside Way and onwards to Buckie. This is part of 'The Moray Routes: Bright Futures Strategic Tourism Infrastructure Development Plan'. Data from the monitoring sites along Cragganmore to Craigellachie section of this route are included in the Active Travel Strategy Annual Update 2023 page 6.

Recent Sustrans 'Hands Up Scotland Survey' results for Moray Schools show a decline in the numbers of pupils walking to school. However there have been increasing number of pupils cycling to school (Active Travel Strategy Annual Update 2023 page 6) which is likely to be a result of the high numbers of pupils receiving Bikeability training and the provision of new cycling and improved infrastructure on some routes to schools.

Moray travel modes - all school types (excluding nursery)

Legend: Walk, Cycle, Scooter / Skate, Park & Stride, Driven, Bus, Taxi, Other
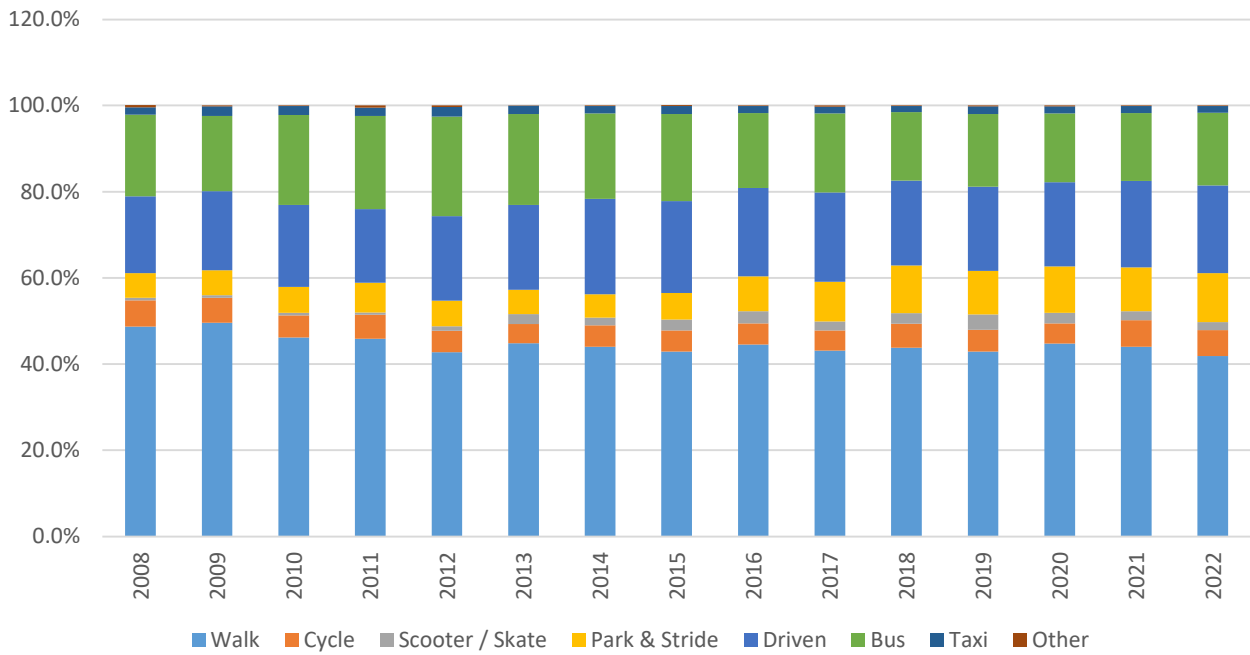
2022 Census data on journeys to employment and education has yet to be published. It is anticipated that this data will not be available until 2025. It is therefore proposed to utilise Scottish House Survey Travel Diary data in addition to the 2011 published census data within the Transport Appraisal. Should the 2022 Census data become available prior to the completion of the Transport Appraisal, then discussions will take place with Transport Scotland as to how best to incorporate the data.

Alternative Fuelled Vehicles

Schedule 1 Climate Change sets out the sources and scale of carbon emissions in Moray. The rural nature of Moray leads to a high volume of vehicular traffic across the region, resulting in significant carbon emissions. Moray's rail network lacks electrification, and the absence of efficient rail freight handling facilities contributes to a high number of HGV journeys within and passing through the region.
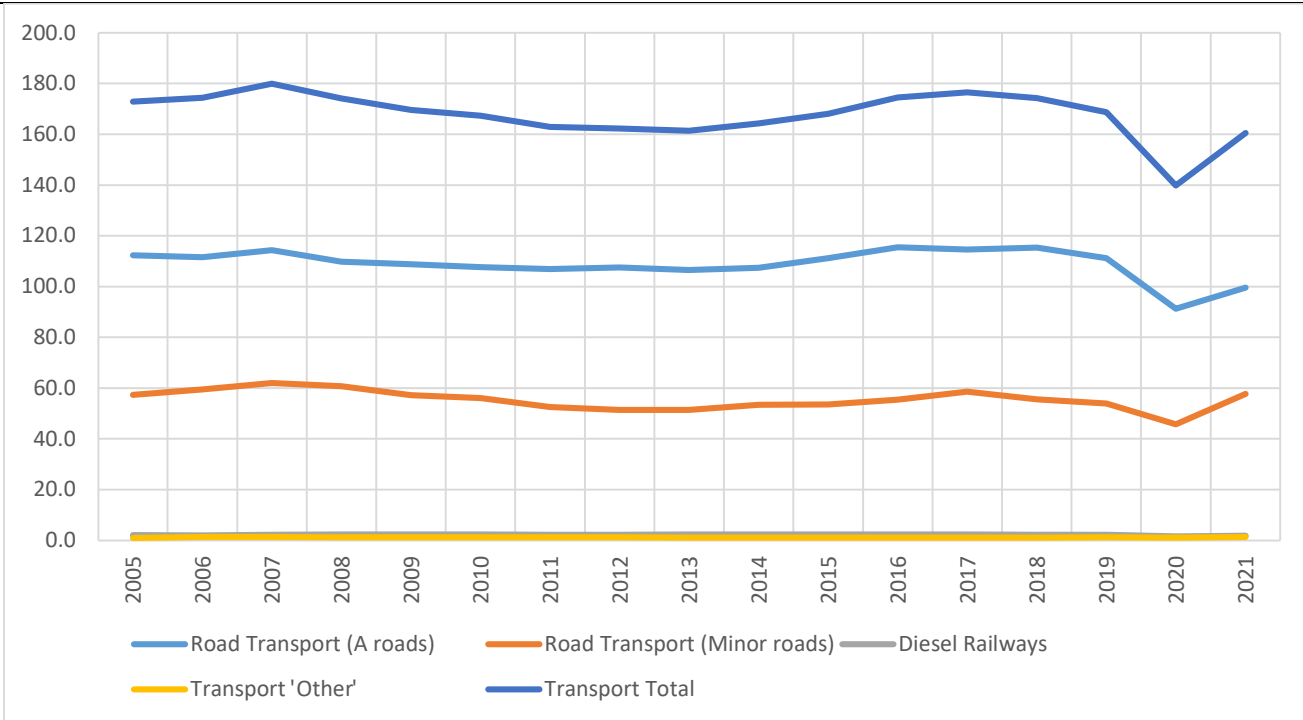
Moray Local Authority Area_ territorial carbon dioxide (CO_2) emissions estimates 2005-2021 (kt CO2e) - Source: Department for Business, Energy & Industrial Strategy - UK local authority and regional estimates of carbon dioxide emissions.

Moray Council submitted their Public EV charging – Moray Strategy & Expansion Plan to Scottish Government in 2023. The Council have joined the Pathfinder Project (alongside Aberdeenshire, Aberdeen City and Highland Councils) to secure an operator and expansion partner for the provision of charging infrastructure. In Moray, in keeping with the rest of Scotland, ownership of electric and hybrid vehicles is rising. Over the past five years (between 2017 and 2022) the number of vehicles registered in Moray has increase from 197 to 2442 (an increase of 1140%) https://www.gov.uk/government/statistics/vehicle-licensing-statistics-april-to-june-2022.
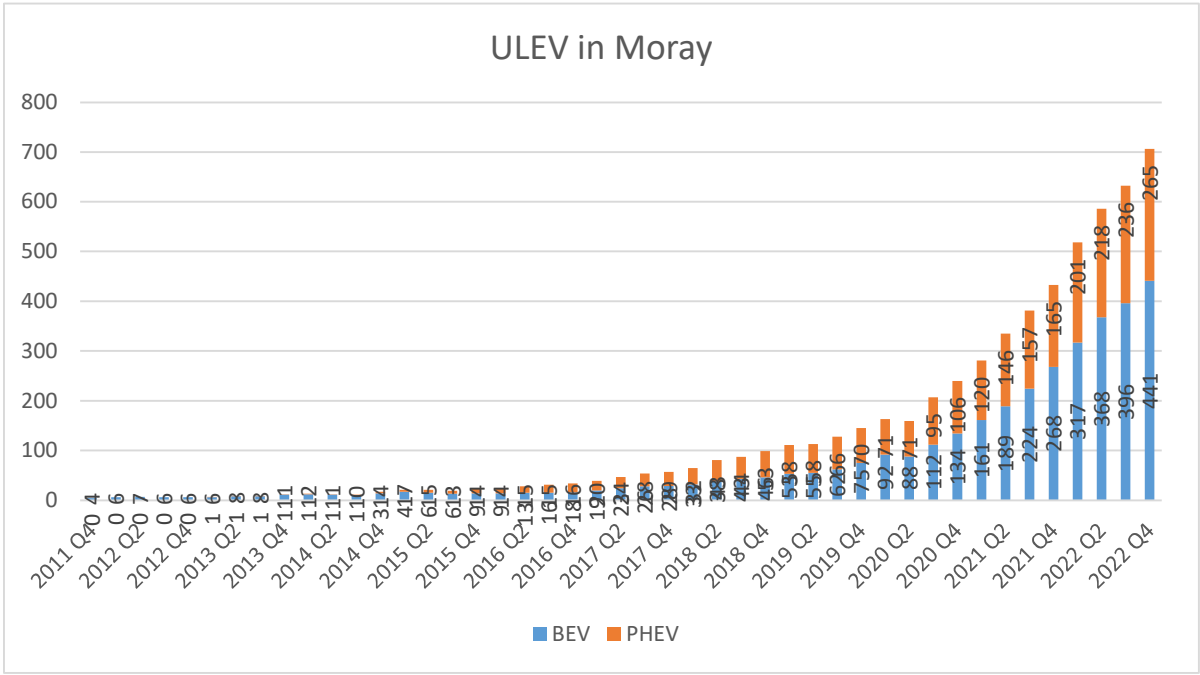
The current LDP already makes provision to ensure that new development provides charging facilities for residents/visitors/employees. The Pathfinder Project will ensure that publically available charging points continue to be available and the charging network expand. The strategy and expansion include sites for new chargers in remote locations, within housing areas which have shared parking areas and on-street locations in historic residential areas with no off-street parking.

Public charging devices per 100,000 of population for Mainland Local Authorities in the North of Scotland - 1st January 2023
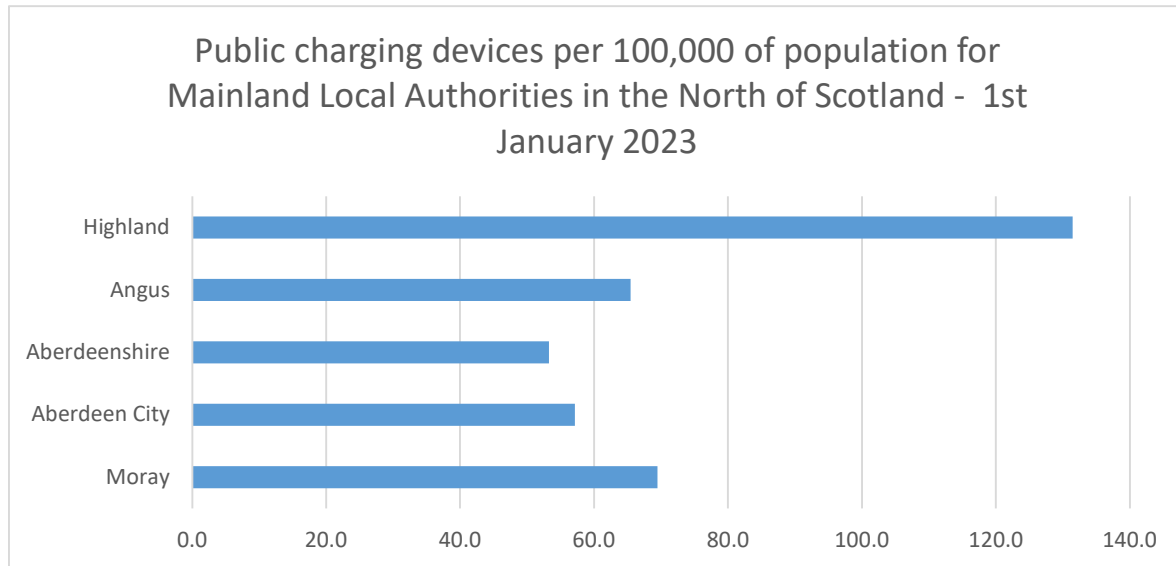
The Moray Hydrogen Strategy 2022 identifies that hydrogen, rather than electrification is likely to be the preferred option for decarbonisation of heavy goods vehicles (HGV's) and buses. The Strategy identifies an opportunity to create a Hydrogen Corridor through Moray by considering hydrogen refuelling stations along the route of the A96. Keith (near Blackhillock) offers a location approximately halfway between Aberdeen and Inverness. It is also important to consider the transport movements from A95 towards the Central Belt, primarily from the whisky industry, and a fuelling zone along this corridor. Initial pilot projects have been identified with potential for hydrogen production and refuelling at the following locations in the short-term: Lossiemouth, Aberlour, Buckie Harbour and Elgin. Work on developing these projects and supporting a hydrogen economy within Moray is ongoing.

The outcomes of this work, along with the expansion of the publicly available electric vehicle charging network, will be considered as part of the Transport Appraisal and inform the site selection process.

Reducing Car-Kilometres

Scottish Government have set a target of a 20% reduction in car-kilometres across Scotland by 2030. The means to achieving this target are set out in the Route Map to achieve a 20% reduction in car kilometres by 2030' and Local Living and 20 Minute Neighbourhood Draft Planning Guidance. Moray Council is supportive of active travel/public transport provision and parking management measures as outlined within the Routemap as way to support a reduction in car kilometres travelled and has set out its commitment to promoting these in this schedule. For rural local authorities with dispersed settlements and limited public transport provision, some of the interventions available to more densely populated areas e.g. Workplace Parking Levy, are not applicable. However, reducing the need to travel long distances to access services through the provision of shared and mobile services and improving digital connectivity is something that can be pursued as set out in Schedule 7 Local Living.

The following graph from Scottish Transport Statistics - All editions shows the increasing level of vehicle-kilometres on the trunk and local roads within Moray (million vehicle kilometres) from 2001 to 2021, with an obvious decrease in 2020 and rebound in 2021.
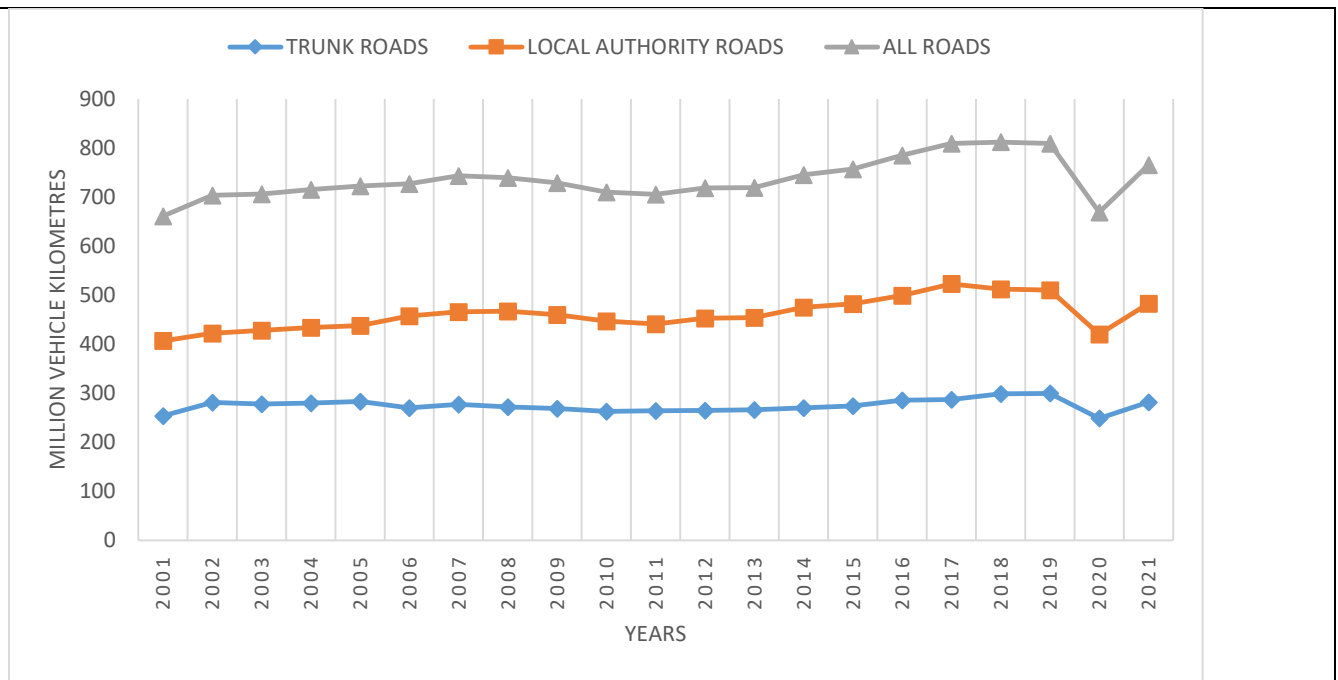
As part of the Transport Appraisal the Council will work with Transport Scotland to identify the routes available for Moray to contribute to the target and whether the reduction in Moray should be 20% or a figure which reflects the geography, settlement patterns and trip making characteristics of the area.

Travel to and around Elgin

Elgin is the main settlement in Moray, with the A96 (T) Aberdeen - Inverness passing east-west through the settlement, and the A941 travelling north-south. Elgin has been the main focus for housing and employment development over the past 20 years, with two major housing allocations (one to the north and one to the south) and a major employment allocation to the east (with direct access from the A96 (T). A transport strategy for Elgin was developed in 2017 which included the collation and analysis of travel data from a number of sources including volumetric multimodal surveys, census data and public responses to a travel survey (Elgin Transport Strategy Main Technical Report).

To inform the strategy, the accessibility in Elgin was determined for pedestrians, cyclists, public transport and private vehicles (cars) based on estimated journey times. TRACC multimodal accessibility analysis software was used to determine these journey times with a single destination on Elgin High Street selected for reliable comparison. Section 2.2 of the ETS Main Technical Report describes the full methodology for the accessibility assessment and present the results for pedestrian, cycle, public transport and car accessibility (Elgin Transport Strategy).

The assessment found that Elgin is a very walkable town due to its compact nature and lack of significant hills, with all existing areas able to access the town centre within a 35-minute walk. For cycling the periphery of Elgin can access the town centre within a 15-minute cycle time and key commuter areas such as Lossiemouth are within a 30 – 40-minute cycle time of the town centre. Public transport accessibility within Elgin was relatively good with 15-minute journeys to the town centre. The accessibility within Elgin and other main settlements in Moray will be reviewed as part of the Transport Appraisal.

The results of the 2011 Scotland Census provide the overall mode share for journeys to work and study for those who both live and work or study in Elgin. Analysis of this data found that:
- Car is the most dominant of all transport modes, attributing to 41% of the mode share;
- Walking is the second most popular mode of travel, accounting for nearly 27% of journeys;
- Car sharing contributes to 11% of the mode share;

- Almost 9% of Elgin's population work or study from home;
- Public Transport (bus and train combined) accounts for almost 7% of the mode share; and
- 3% of people from Elgin cycle to work or study.

Active Travel (walking and cycling) accounts for 30% of the total mode share for journeys to work or study within Elgin.

How people travel into, around and out of Elgin is paramount to identifying the demands for travel on routes throughout the settlement. The ETS utilised ward level Origin-Destination data from the 2011 Scotland Census as a basis for understanding where people travelling to and from, in and around Elgin. Section 2.4 of the ETS Main Technical Report contains the analysis of this data which found that 60% of Elgin's population travel to a work destination in Elgin with 40% travelling elsewhere. For people travelling to Elgin to work, Lossiemouth was the biggest contributor of movements to Elgin from within Moray, followed by Forres, Buckie and Keith.

The ETS also considered traffic trends within Elgin and on the A96 trunk road through Elgin by comparing observed traffic flows from 2010 to 2015. Section 2.5 of the ETS Main Technical Report presents the observations which generally found that average daily traffic on select local road links increased by approximately 5% between 2010 and 2015. Traffic increased by around 2% on the A96 (T) through Elgin over the same period, with slightly reduced growth of 1.5% on the A96 (T) within the town centre (Alexandra Road).

Traffic data from between 2015 and 2019 traffic on the A96 (T) within Elgin continued to grow by approximately 1.7% on the A96 (T) West Road. However, there was a decrease of 3.8% on the A96 (T) East Road. On the local roads within Elgin traffic over the period 2015 to 2018 has no discernible pattern of overall growth. Traffic has grown on roads serving new development areas and on an alternative route for traffic entering Elgin from the east. In 2018 comprehensive surveys were undertaken within Elgin, including junction turning counts, to inform the development of the new Elgin Traffic Model. These surveys have been repeated in 2023 and are being used to inform the update of the Elgin Traffic Model.

In 2020 and 2021 there were significant reductions in traffic flows as a result of travel restrictions in place during the Covid-19 Global Pandemic. As restrictions eased, traffic levels increased. However, many travellers, in particular commuters, have changed their trip making characteristics which means that for a number of locations in Elgin traffic flows have yet to return to pre-pandemic levels.

Annual Average Daily Traffic Moray Permanent Counter Sites - Urban Roads

Site Number	Classification	Site Details	2018	2019	2020	2021	2022	2023	Percentage increase from 2018
8	Urban	A941 - New Elgin Rd on railway bridge	20584	21648	16847	19471	21822	21013	2%
10	Urban	A941 - Hay St, Elgin	10894[1]	13075	10107	11204	12841	12122	11%
20	Urban	A941 - Main St, New Elgin	11302	11791	9585	10531	11468	12048	7%
11	Urban	A941 - North St, Elgin	15977	15289	13147	13228	15039	15174	-5%
22	Urban	B9012 - Spynie Rd, Elgin	4137	4405	3331	3491	3689	3790	-8%
9	Urban	U171e - Edgar Road, Elgin	10340	10319	8876	10044	9757	9124	-12%
18	Urban	U171e - Maisondue Rd, Elgin	8344	8889	6838	7787	6808	5643	-32%
19	Urban	U171e - Reiket Lane, Elgin	10318	10283	8857	8678	1218	9727	-6%
21	Urban	U171e - Newmill Rd, Elgin	11995	11798	9554	10381	10483	10698	-11%
32	Urban	U171e - Wittet Drive, Elgin	4590	4486	3877	3953	3190	4076	-11%
33	Urban	U171e - Covesea Rd, Elgin	3496	3487	3411	3740	4138	4169	19%[2]
36	Urban	C40E Thornhill Rd Shops	4871	4724	3568	3912	4061	4170	-14%
37	Urban	U171e - The Wards, Elgin	7254	7582	6165	6374	1798	7131	-2%
14	Urban	A940 - St Catherines Road, Forres	11004	11391	9158	10025	10818	10773	-2%

1. *Traffic flows in 2018 affected by long term roadworks near this count site.*
2. *Increase in traffic due construction of new housing with new access near this count site.*

Inter-Urban Travel by Motorised Vehicles

Whilst traffic flows with Elgin and Forres (single site) have generally remained below pre-pandemic levels, traffic flows on the main inter-urban local roads have generally returned to pre-pandemic levels and are starting to show signs of growth beyond 2018/2019 flows.

Annual Average Daily Traffic Moray Permanent Counter Sites – Inter-Urban Roads

Site Number	Classification	Site Details	2018	2019	2020	2021	2022	2023	Percentage increase from 2018
5	Inter Urban	A941 - Elgin - Lossiemouth	10069	10194	8857	9694	10160	10335	3%
7	Inter Urban	A941 - Elgin - Fogwatt	7127	6914	5764	6205	6188	6708	-6%
15	Inter Urban	B9016 - Aultmore	2230	2079	1688	1914	2073	2281	2%

23	Inter Urban	A98 - Arradoul	9835	9886	8298	7699	9719	10172	3%
26	Inter Urban	A98 - Portsoy Rd, Cullen	4672	4496	3977	4438	4511	4790	3%
29	Inter Urban	B9013 - Newton to Burghead Rd at Roseisle	2995	3075	2552	2815	2835	2845	-5%
35	Inter Urban	A95 - Keith (NESCAMP site)	3130	3146	2647	2835	2963	3294	5%

Data from Transport Scotland's permanent count sites on the Trunk Road network also generally shows that traffic flows are return to pre-pandemic levels on inter-urban roads. Whereas on the sections of road within built-up areas the traffic flows generally remains below pre-pandemic levels.

Average Daily Traffic _Transport Scotland Sites Moray							
Site Details	2018	2019	2020	2021	2022	2023	Percentage increase from 2018
A96 Mosstodloch Bypass East	12845	9385	7399	9140	12567	13102	2%
A96 Mosstodloch Bypass Middle	17559	17412	14015	15419	16836	17520	0%
A96 Mosstodloch Bypass West	14648	14502	9965	12937	13631	14260	-3%
A96 Elgin to Lhanbryde	17785	17740	14068	16214	17127	17706	0%
A96 Elgin - East Road	22601	22019	16376	18691	21323	22038	-2%
A96 Elgin - West Road	16814	16361	12145	14852	15231	15786	-6%
A96 Forres to Elgin	12394	12371	9509	10953	11931	12301	-1%
A96 Forres	12755	13090	10323	10501	13613	13943	9%
A96 Forres (aka Brodie)(Core 744	11187	11674	8984	10126	11274	11636	4%
A95 Ballindalloch (Core 905)	2398	2431	1679	1914	2294	2430	1%

The Transport Appraisal will include further analysis of data and take into consideration the existing traffic flows, seeking to ensure that where possible new development does not have an adverse impact on those locations where capacity is constrained, and if required, mitigation is provided through the provision of infrastructure or developer obligations.

Road Safety

The draft Moray Road Safety Plan to 2030 is currently out to stakeholder consultation. Data analysis undertaken to inform the plan shows that the overall number of reported injury accidents in Moray is low (compared to the rest of Scotland), 70% of casualties are injured on non-built up roads (rural roads) compared to just a third of casualties for Scotland as a whole. Consideration of the reported injury accidents will be included as part of the Transport Appraisal and be taken into account in the site selection process.

A96 (T) Aberdeen – Inverness Corridor

The A96 (T) Aberdeen – Inverness is the key corridor for east-west travel through and within Moray. The route currently passes through a number of settlements, including the larger settlements of Elgin and Keith, and skirts the northern side of Forres (acting as a barrier between the town of Forres and its railway station and main employment areas). In 2011 Scottish Government stated that their aim to provide a dual carriageway with

grade-separated junctions between Aberdeen and Inverness by the year 2030. The preferred route of the section which starts in Hardmuir and ends at Fochabers has been safeguarded in the 2020 Moray LDP.

However in 2021, as part of the Bute House Agreement, Scottish Government commenced a review of the A96 corridor. The Case for Change was published in December 2022 and highlighted the following options which would be taken forward to the next stage which have direct implications for the Moray LDP:

Mode of Transport	Option	Description
Active Travel	Active Communities	Deliver networks of high-quality active travel routes and placemaking improvements within key communities along the A96 corridor such as Kintore, Inverurie, Huntly, Fochabers, Elgin and Forres.
Active Travel	Active Connections	Deliver high quality active travel linkages for people walking, wheeling and cycling between settlements along the A96 corridor, which would combine to form a continuous traffic-free path all the way from Inverness to Aberdeen, either directly adjacent to, or close to, the A96.
Bus	Bus Priority Measures and Park & Ride	Implement schemes targeted at delivering faster and more reliable journey times for bus passengers, coupled with the provision of new bus Park & Ride sites where appropriate.
Freight	Introduce Rail Freight Terminals	Facilitate the introduction, the development and operation of rail freight terminals by the private sector at Inverness, Georgemas Junction, Keith and Elgin, to facilitate freight movements to / from these locations by rail.
Multimodal	Improved Public Transport Passenger Interchange Facilities	Improve public transport passenger facilities, including accessibility and quality enhancements at bus stations and railway stations.
Multimodal	Active Hubs	The creation of a strategy for the delivery of active hubs within communities across the length of the A96 corridor.
Public Transport	Investment in Demand Responsive Transport (DRT) and Mobility as a Service (MaaS)	Improve access to travel opportunities in locations with low bus network connectivity or where conventional fixed route services may not be suitable or viable. In these areas, flexible services, such as Demand Responsive Transport (DRT) or Community Transport (CT), may be able to provide improved public transport links.
Rail	Linespeed, Passenger and Freight Capacity Improvements on Aberdeen to Inverness Rail Line	Three distinct improvements to the railway between Aberdeen and Inverness; linespeed improvements to cut journey times, the provision of passing loops to enable a more frequent passenger service and the provision of freight facilities to enable intermodal freight to operate.

Rail	Improved Parking Provision at Railway Stations	Enhance parking facilities at railway stations between Aberdeen and Inverness with the aim of encouraging the use of existing low carbon infrastructure for medium and long-distance travel along the corridor.	
Road	Targeted Road Safety Improvements	Improving the safety performance of the A96 trunk road to address both real and perceived road safety concerns (with potential measures ranging from minor improvements through to partial dualling).	
Road	Elgin Bypass	Improve the safety, resilience, and reliability of the A96 within the vicinity of Elgin through the provision of a bypass of the town.	
Road	Keith Bypass	Improve the safety, resilience, and reliability of the A96. within the vicinity of Keith through the provision of a bypass of the town.	
Road	Forres Bypass	Improve the safety, resilience, and reliability of the A96 in Forres through the provision of a bypass within the vicinity of the town.	
Technology	A96 Electric Corridor	Provision of alternative refuelling infrastructure and facilities along the A96 corridor, its interfacing local roads as well as, where appropriate, strategic economic and transport hubs. This option will directly facilitate the dispensation of alternative sources of fuel for various modes of sustainable transport although it is recognised that the option is likely to focus on road vehicles.	

Reference: [Table 11: List of Retained Options_A96 Corridor Review – Initial Appraisal: Case for Change (December 2022)](#)

As the A96 corridor review is on-going, once it has been published the findings which have direct implications for Moray will be discussed with Transport Scotland and included in the Transport Appraisal. Moray Council is also committed to sharing any data collected which may be of use to the A96 Review and to providing access to the Elgin Traffic Model to support Transport Scotland's next steps.

There are currently unknown outcomes of the A96 Corridor Review which may have implications on the consideration and selection of development sites. This introduces a risk to the timetable of the LDP review as some information may not be available on the options to be taken forward for the A96 corridor at the time of that the site selection process takes place.

Infrastructure Condition

Another area where there are unknown implications at this time relates to the bridges and culverts on the local road network which cross watercourses, rivers and railways. The condition of these bridges is regularly assessed. However over the past 15 years there has been a decline in funding for the replacement and repair of these structures. The Council has developed a methodology to prioritise the replacement and/or repair of critical bridges. This methodology will inform a strategy which will be developed to ensure that resources are directed to maintaining the critical bridges. The strategy will also identify bridges which will not receive funding

(as there are reasonable alternative routes). The bridges strategy will be used to inform the site selection process.

Engagement and Consultation

Public drop in exhibitions as part of early engagement on the new Local Development Plan were held across 8 towns from March 2023 to September 2023 with over 300 people attending. Comments relating to transport and active travel were as follows:

- Concerns expressed regarding the cost of public transport and the need to invest in improved bus and train services across the region.
- The lack of public transport in rural areas and along the coast and reliability of service was a major concern. The opportunity for M-Connect to supplement existing bus services was identified with more investment to extend the service.
- Investment in new active travel routes to create connections within towns, connecting main towns to smaller surrounding villages and upgrading of existing networks was also highlighted as an issue.
- The need to repair Cloddach and Pittendreich bridges was identified.

A number of comments on transport and active travel were also submitted through the Call for Ideas:

- Tackle congestion on A96/ Dual A96/Bypass for Elgin and Keith
- Better transport links needed to attract business.
- More/better active travel links across Moray and filling missing links.
- Improved bus services – increase number of services and provide evening services
- Reduce speeds in town to 20mph.
- Carpool/car share
- Rail connection to Dufftown

Summary of Stakeholder Engagement

- Local Authority Transportation colleagues – Transportation colleagues were integral to drafting the summary of evidence and their comments on the finalised schedule and review of stakeholder responses have been incorporated.
- Transport Scotland – See statement of agreement/dispute below.
- HiTRANS – See statement of agreement below.
- NESTRANS – See Statement of agreement below.

Summary of Implications for the Proposed Plan

The Council is committed to preparing a Transport Appraisal to inform the LDP with traffic counts completed and budget allocated to complete this. The Council will work with Transport Scotland in the preparation of the Transport Appraisal to identify new or updated data as identified in the 'Links to Evidence' section above.

- The findings of the A96 Corridor Review will have implications on the LDP. The Council is committed to working with Transport Scotland to incorporate the findings of the review into the Transport Appraisal and to ensure that development proposed within the LDP supports the delivery of any transport interventions which are taken forward. When available, the outcomes of the A96 Corridor Review will be used to inform the Transport Appraisal and LDP (including site selection.
- To ensure development is directed to locations with access to the most sustainable modes of transport site selection assessments will include consideration of
  o Public transport availability;
  o Active Travel infrastructure;
  o EV charging infrastructure;

- o Road safety – reported injury accidents;
- o Bridges Strategy; and
- o Any capacity constraints on the Trunk Road and Public Road networks.
- As options identified in the A96 Corridor Review Case for Change (Dec 2022) relating to rail investment/improvement are developed, they will be considered in the review of the LDP e.g. safeguard of land for options.
- Continue developer requirement to provide EV charging facilities for residents/visitors/employees.
- As projects develop from the Moray Hydrogen Strategy, they will be considered in the LDP e.g. identification/safeguard of land for refuelling stations.

Statements of Agreement

NESTRANS

NESTRANS welcomed the recognition and inclusion of various aspects within the evidence base these include the key transport links between Moray and Aberdeenshire, the improvements proposed to railway lines, evidence from the updated case for change for the A96, sustainable transport goals, aspirations for road safety and discussion on alternative fuel vehicle opportunities.

HITRANS

HITRANS have noted their agreement with the sufficiency of the evidence set out.

Transport Scotland

Transport Scotland recommend that the Council access Rail Data Marketplace and liaise with Network Rail or Scotrail Holdings to obtain any further data. Moray Council confirm that this will be done for the Transport Appraisal. For the Evidence Report Moray Council have considered data from Scottish Transport Statistics which provided a high-level overview of rail passenger journeys from Moray stations.

Transport Scotland noted a lack of information within the Evidence Report on parking and the need to minimise space dedicated to parking and shift to low/no car developments. As part of the review of the last LDP Moray Council reviewed the parking standards and included them as an appendix to the LDP policy document. A review of the standards to reflect the approach set out in NPF4 will be completed and form part of the Proposed Plan. Transport Scotland have referenced the Climatexchange document "Reducing Car use through parking policies" and information from this will be used to inform the Moray Council approach to parking standards. It should be noted that since 2012 Moray Council have had reduced parking standards for town centre developments including zero parking provision where there is change of use or conversion of commercial buildings to residential dwellings.

Statements of Dispute
None identified.

Issue: Topic / Place	11. Flood Risk and Water Management
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15(5) – the principal physical and environmental characteristics of the district • Regulation 9 having regard to any river basin management plan, flood risk management plan and any local flood risk management plan.
	CD145 [Moray Local Development Plan 2020 Strategic Flood Risk Assessment](#) **CD146** [Local Flood Risk Management Plan for Findhorn, Nairn and Speyside 2022](#) **CD147** [Local Flood Risk Management Plan for the North East](#) **CD148** Moray Council Surface Water Management Plans **CD149** [The River Basin Management Plan for Scotland 2021 - 2027 Dec 2021](#) **CD150** [Moray Council Supplementary Guidance on Flood Risk and Drainage Impact Assessment for New Development Aug 2020](#)

NPF4 Context

NPF 4 Policy 22 Flood risk and water management sets out a policy framework that seeks to increase community resilience to the current and future impacts of climate change, by avoiding development in areas at flood risk. The Moray Local Development Plan 2027 should take into account the probability of flooding from all sources and make use of relevant flood risk and river basin management plans for the area to inform land use designations using a precautionary approach. Policy 20 Blue and Green Networks highlights the integral role of green and blue infrastructure in flood prevention and water management while Policy 10 Coastal development requires a precautionary approach to flood risk in coastal areas recognising rising sea levels and more extreme weather events resulting from climate change. It should be noted that green and blue infrastructure is addressed in Schedule 2b Blue and Green Spaces and coastal development is addressed in schedule 1 Climate Change.

Summary of Evidence

Flooding In Moray

Floods in July 1997, November 2002 and September 2009 caused widespread damage to homes and businesses, and disruption to road and rail links. Since 2014 Moray Council has invested over £170 million in Flood Alleviation Schemes across Moray. These schemes/works include flood alleviation schemes in Elgin, Forres (Burn of Mosset), Forres (River Findhorn), Rothes, Lhanbryde and Newmill and flood alleviation works in Dallas, Longmorn and Arradoul.

Moray Council's approach to flood risk

The Council's current approach to flood risk is closely aligned with the policy intentions set out in NPF 4. The following sections sets out the flood risk plans and assessments the Council has in place in respect of flood risk to influence the Moray Local Development Plan 2027.

Local Flood Risk Management Plans – Findhorn, Nairn and Speyside and the North East

The Flood Risk Management (Scotland) Act 2009 places a duty on responsible authorities to manage flood risk on a plan-led, risk based, sustainable way. The 2015 National Flood Risk Strategy for Scotland splits Moray across two local district areas, the Findhorn, Nairn and Speyside (FNS) Local Plan

District Area and the North East Local Plan District Area. Moray Council is the lead local authority for the FNS plan and is part of the North East Local Plan District, for which Aberdeenshire is the lead local authority. Every six years Moray Council must produce and publish a Local Flood Risk Management Plan for the FNS Local Plan District. This Plan is developed working in partnership with SEPA, Scottish Water, Highland Council, Cairngorm National Park Authority, Forestry Scotland and Transport Scotland. The most up to date plan was adopted in 2022 and a summary of actions within it are set out below.

Principal physical and environmental characteristics of the district

Most of Moray sits within the FNS Local Plan District that covers an area of around 4,800km² and has a population of approximately 100,000 people. It includes the low-lying coastal areas around Nairn (outwith Moray) and Lossiemouth in the north and the steeper, more rugged landscape of the Cairngorms National Park in the south. The area is largely rural with the main land cover including heather grassland, bog, coniferous woodland and agricultural land. The main rivers are the River Spey, the River Findhorn and the River Nairn. The coastline is approximately 70km long and includes rocky shorelines and extensive beaches.

There is river, surface water and coastal flood risk in the FNS Local Plan District, with the main risk coming from river and surface water flooding. The area has been affected by several large floods. In December 2012, a storm led to coastal flooding in Lossiemouth and Kingston and in August 2014 ex-hurricane Bertha caused widespread river flooding within Elgin and Dallas was also particularly affected. Currently it is estimated that there are 11,000 people and 7,300 homes and businesses at risk from flooding. This is estimated to increase to 15,000 people and 9,900 homes and businesses by the 2080s due to climate change.

The Local Flood Risk Management Plan for the North East covers the eastern extents of Moray where land use is typically arable, horticultural farmland and improved grasslands. There is river, surface water and coastal flood risk in the Local Plan District, with the main risk coming from river and surface water flooding.

There are eight areas within Moray identified as being potentially vulnerable in the FNS Local Flood Risk Management Plan these are Burghead to Lossiemouth, Spynie, Lhanbryde, Kingston and Garmouth, Elgin, Forres, Rothes, Aberlour and Kinloss. The North East Local Flood Risk Management Plan identifies potentially vulnerable areas in Portgordon, Buckie, Keith and Newmill. Both Local Flood Risk Management Plans adopted in 2022 identify priority actions within the six-year cycle 2022 to 2028 including maintenance of existing flood defences, flood studies, surface water management plans, flood schemes or work design. Further detail includes funding arrangements for each action, which organisation will be responsible for delivery of the action, the timescale for delivery and details of any coordination between authorities.

Flood Risk and Drainage Impact Assessment for New Developments Supplementary Guidance August 2020

The Council has produced detailed Flooding and Drainage Impact Assessment Supplementary Guidance providing advice to developers on the information required to support planning applications. The guidance requires flood risk and drainage to be assessed at an early stage in the development process by a competent and experienced professional. The level of detail required is proportionate to the complexity of the flood risk mechanisms, the site and the severity of the risk, which is affected by its location and to an extent the vulnerability of the proposed development. It is expected the information submitted will demonstrate that the proposed development is not at risk of flooding and will not increase flood risk elsewhere. Any proposal must also include robust and sustainable drainage proposals.

The Council is in the process of updating this Supplementary Guidance to take account of NPF 4 Policy 22 Flood Risk and Water Management Planning which will effectively ensure guidance is fully reflective of the requirements from NPF 4. This will be adopted shortly.

Moray Local Development Plan (MLDP) 2020 Strategic Flood Risk Assessment (SFRA)

A Strategic Flood Risk Assessment (SFRA) was prepared to support land designations identified within the Moray Local Development Plan 2020. The high-level map-based assessment provided an overview of the scope and nature of all sources of existing and future flood risk within the local development plan area. The plan was based on SEPA's Flood Risk Hazard Maps, recorded Moray Council information available at the time and technical comments from the Moray Council's Flood Risk Management Team and SEPA. The review of existing known information was used to screen existing designations, LONG sites and preferred bid sites submitted for inclusion in the Moray Local Development Plan 2020.

A revised SFRA will be prepared taking account of updated guidance, information and mapping.

Surface Water Management Plans (SWMP)

Surface water flooding is experienced throughout Moray. The Council has worked in partnership with SEPA and Scottish Water to develop Surface Water Management Plans (SWMP). By 2027 the objective is to reduce the number of properties at risk from surface water flooding, reduce the annual average damage caused by surface water flooding and maximise the number of people registered with Floodline. Priority areas have been identified and SWMP are being developed for Aberlour, Rothes, Buckie, Elgin, Keith and Forres. In terms of progress actions from the Elgin SWMP have been forwarded for national prioritisation by Scottish Government and subject to resources and funding will be progressed. The Forres SWMP has been delayed this year due to resourcing issues.

River Basin Management Plans

SEPA has prepared a River Basin Management Plan for Scotland for 2021 to 2027 which sets out a framework for protecting and improving the benefits provided by the water environment. The Council has not prepared its own River Basin Management Plan but is seeking to mitigate the impact on the water environment and help halt species decline by seeking to deliver high quality, multifunctional blue-green spaces in new developments and promoting natural solutions such as rain gardens to deal with surface water. The Council is commissioning ecologists to identify a network of blue and green networks across Moray which includes enhancement and protection of blue and green infrastructure. Relationships are being developed with the Spey Catchment Initiative and the Findhorn Watershed Initiative to look at how nature networks can be delivered. Early draft mapping has identified the river catchments as being crucial for ecological connectivity. It is anticipated that the final nature network opportunity map will highlight key recommended actions that will guide a wide range of stakeholders. The Council also works with the Scottish Invasive Species Initiative to support their strategic approach to invasive non-native species (INNS) removal along watercourses across Moray.

Conclusion

The Council's approach to flood risk management is already closely aligned to NPF 4 and the Flood Risk Management Act 2009. The current Flooding and Drainage Supplementary Guidance is being updated to reflect NPF 4 Policy 22 and will be adopted shortly. The Strategic Flood Risk Assessment prepared to support the Moray Local Development Plan 2020 will be updated to take account of new land designations and any changes in legislation and guidance. The assessment will be informed by work already undertaken on Local Flood Risk Management Plans, Surface Water Management Plans and with input from SEPA and the Council's Flood Risk Management Team.

Summary of Stakeholder Engagement

• SEPA – See statement of agreement below.
• Scottish Water – See statement of agreement below.
• Moray Council Flood Risk Management- comments have been incorporated into the schedule.

Summary of Implications for the Proposed Plan

- **Updated Flood Risk and Drainage Impact Assessment for New Developments Supplementary Guidance is currently being prepared to align current guidance with NPF 4 Policy 22 Flood risk and water management.**

Statements of Agreement

SEPA

Strategic Flood Risk Assessment

SEPA has recently published new guidance on SFRA to align with NPF4 and the new development planning process and SEPA's flood maps have been updated (Nov 2023) for the coast and now include the Future Flood Maps. The SFRA prepared for the Moray Local Development Plan 2020 does not use the most up to date information required to inform the Evidence Report. In addition to this the Council's flood team has recently commissioned studies of flood protection schemes to assess the risk behind them, which could also be reflected in an updated SFRA.

To address this agreement has been reached with SEPA that the Council will prepare a SFRA to be agreed with SEPA in advance of submitting the Evidence Report to the DPEA. The SFRA will be prepared with input from the Council's Flood Risk Management Team and in consultation with SEPA.

Site Assessment Checklist

Request that the site appraisal methodology includes questions/criteria related to flood risk. Specifically, for every site that at the time of its assessment either (i) its flood risk is fully understood (which could be via the SFRA) or (ii), if not, that a Flood Risk Assessment be undertaken at the appropriate stage to ensure that it is. This will provide certainty at as early a stage as possible in the plan preparation that only sites that are in accordance with NPF4 are included in the Proposed Plan.

The Council is using the site assessment checklist promoted by the Improvement Service which includes the two-flood risk related questions set out above.

Scottish Water

Scottish Water is satisfied with the sufficiency of the evidence provided.

Statements of Dispute

None identified.

Issue: Topic / Place	12. Community Wealth Building
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15(5)- the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district.
Links to Evidence	**CD151** Moray Community Wealth Building Strategy 2023 Draft **CD152** Moray Planning Policy Guidance - NPF4 Policy 25 **CD153** Moray Council Register of Community Asset Transfers **CD154** Scottish Index of Multiple Deprivation dataset **CD120** Moray Community Planning Partnership Local Outcome Improvement Plan v2 **CD155** Inequalities in Moray lived experience of poverty 2019-2021. **CD156** Buckie Central East Locality Plan 2019-2029 **CD157** New Elgin East Community Plan 2019 **CD158** Developing a new model to maximise local economic benefits from development in Moray and Highland January 2024

National Planning Framework 4 (NPF) Context

NPF4 requires local development plans to be aligned with any strategy for community wealth building for the area. Spatial strategies should address community wealth building priorities, identify community assets, set out opportunities to tackle economic disadvantage and inequality and seek to provide benefits for local communities.

The policy outcomes which NPF aspires to for CWB are;
- Local economic development that focuses on community and place benefits as a central and primary consideration, to support local employment and supply chains.
- Support community ownership and management of buildings and land.

Summary of Evidence

Community Wealth Building Strategy

Moray Council's Economic Development and Infrastructure Services Committee approved a draft Community Wealth Building Strategy on 20th June 2023 which identified the following key challenges and opportunities (page 7);
- Childcare- Moray has inadequate provision of pre-school and wraparound childcare facilities.
- Gender pay gap of 22.1%, higher than the Scottish average of 11.1%
- Female entrepreneurship rate is 8.6%, one of the highest rates in Scotland.
- Moray has a thriving third sector with 147 organisations (voluntary and community organisations- including registered charities, associations, self- help and community groups)
- Average weekly earnings are the 5th lowest in Scotland and is 6% lower than the Scottish average.
- Underemployment rate is 9.3% exceeding the Scottish average of 8.5%.
- The Moray Growth Deal, Just Transition, Levelling Up Fund, Long Term Plan for Towns and significant investment at RAF Lossiemouth and through the private sector all offer significant opportunities to embed and deliver community wealth building principles.
- By 2039 the working age population in Scotland is projected to increase by 1% but in moray it is projected to fall by 3%

The vision in the draft strategy is "creating a fair and equal society where our communities have a greater stake in Moray's economy". The priorities in the draft Strategy are reflected in the aims which are;

- Embed a local first approach to procurement within Moray where more wealth is retained locally, benefitting our local workforce, and reducing our carbon footprint.
- Through investing in our current and future workforce, we want to remove barriers to employment by providing learning and skills development opportunities, increase access to create pathways ad ensure our workforce are paid a fair wage.
- Support small businesses, community organisations, social enterprises, and co-operatives to have a greater stake in the economy, with increased ownership and control of assets, to retain and circulate wealth within our communities.
- We will work with key departments within Moray Council and our anchor partners to ensure communities maximise benefit and generate wealth from local land and property.
- Capitalise on opportunities for public and community investment in local development proposals.

The Moray Anchor Network has been set up to share information and deliver projects identified in the Strategy. A final version of the Strategy is anticipated to be considered by the Council's Economic Development and Infrastructure Services Committee in spring/ summer 2024.

Community Wealth Building Planning Policy Guidance

To support delivery of NPF4 policy 25 Community Wealth Building, the Council approved planning policy guidance on 30th May 2023 which sets out information which applicants should set out in a Community Wealth Building Plan for planning applications of;

- Residential developments of 10 or more units
- Commercial, industrial, retail, leisure, infrastructure developments where floor space is 1,000m2 or more.
- Energy related proposals of 5MW or more (including battery storage, grid infrastructure and energy production).

The guidance aims (p2) to;

- Increase employment opportunities by helping local businesses to grow and diversify.
- Increase local spend within the local area through increased use of the local supply chain.
- Provide local employment and skills development opportunities within the local area, particularly within areas of highest inequalities.
- To provide opportunities for new business start- ups in the area
- To provide opportunities for community ownership of business and assets

The Council's planning staff encourage applicants/ developers to engage as early as possible to discuss community wealth building opportunities, however, while respecting that this area of national policy is relatively new and with the exception of some excellent examples of community wealth building from local housebuilders and other industry, the quality of Community Wealth Building Plans submitted to date have failed to address the policy requirements.

Local Outcome Improvement Plan (LOIP) v2

The Moray Community Planning Partnership agreed version 2 of the LOIP in 2023. The Partnership has identified 4 main priority areas to guide this work and deliver the vision (p4) of;

- Developing a diverse, inclusive and sustainable economy
- Building a better future for our children and young people in Moray

- Empowering and connecting communities
- Improving wellbeing of our population

Inequalities in Moray 2019- lived experience of poverty 2019-2021.

This report originated from an action group which was developed from the Fairer Moray Forum to address a disconnection between grassroots activity and work ongoing at a strategic level. A key feature of the findings is understanding the barriers to participation and learning and acknowledging that basic security needs have to be met before people are able to engage, participate and learn, it was considered essential to understand the challenges better to gain insights into meeting the learning needs of people with increased barriers.

The report sets out a series of case studies and summaries to highlight the lived experience of Moray residents. The report is currently being updated.

Locality Plans for New Elgin East and Buckie Central

The New Elgin East Community Plan was approved in September 2019 and refreshed in 2023 by the New Elgin East Working Group with support from the Moray Community Planning Partnership. The Plan identifies strengths of New Elgin and a number of areas for improvement which are grouped into 4 themes of;
- Better Off
- Better Place
- Better Health
- Better Community

The Buckie Central East Locality Plan 2019-2029 was published in August 2019 and then reviewed and published in 2022 by the Moray Community Planning Partnership supported by Buckie Area Forum and Buckie and District Community Council. Four priority areas for action are identified;
- Community Voice
- Connectivity
- Learning and Life Skills
- Young People

Community Asset Transfers

The Council Asset Register for Community Asset Transfers accords with section 94 of the Community Empowerment (Scotland) Act 2015 which requires that public authorities make available a register of land and buildings that it owns or leases to the best of its knowledge and belief. The inclusion of an asset on the register of a requirement of the Act and does not necessarily imply that Moray Council is actively seeking to transfer that asset to the community. The register identifies if assets are occupied by the Council, leased out or transferred.

In addition to the register, a report on current cases 2023/24 is included as evidence, which sets out expressions of interest, asset transfer requests, CAT-lite applications, Community Rent rebate applications and closed cases.

The Scottish Index of Multiple Deprivation (SIMD)

SIMD is a "relative measure of derivation across 6,976 small areas (called data zones)". If an area is identified as deprived this can relate to people having low incomes but can also mean fewer resources of opportunities, SIMD looks at the extent to which an area is deprived relating to 7 factors, namely income, employment, education, health, access to services, crime and housing. SIMD ranks data zones from the most deprived (ranked 1) to least deprived (ranked 6,976). It is acknowledged that data zones in rural areas cover a large geographic extent and reflect a more mixed picture of deprivation.

Specific data zone areas of higher deprivation highlighted in the SIMD for Moray ranked below 1500 include;

- Heldon West (S01011092) - 560
- Elgin Cathedral to Ashgrove (S0101101)- 1067
- New Elgin East (S01101111)- 1298
- Forres Central East (S1101154)- 1377

Developing a new model to maximise local economic benefits from development in Moray and Highland January 2024

Moray and Highland Council commissioned Biggar Economics to investigate the benefits which have arisen during the construction and operation of energy developments in Moray and Highland and to consider how benefits might be maximised in the future.

The study highlighted that since 1998, an estimated £4.5 billion has been spent on the development and construction of wind energy projects in the region while ongoing operations and maintenance expenditure is estimated to amount to around £128 million/year. The social and economic impacts of this investment are huge, it is estimated that;

- The capital expenditure undertaken to develop these sites has generated a cumulative economic impact of £0.9 billion and supported around 17,670 years of employment in Moray and Highland: and
- Each year the ongoing operations of these wind farms generates a further £34 million GVA for the regio and supports more than 400 jobs.

The sector is also an important source of support for local communities. In 2023 between 80% to 90% of wind farms in the region were providing direct funding to host communities through a community benefit fund. In addition, many developers are also providing wider benefits through mechanisms such as shared ownership and electricity discount schemes or support for community led housing projects or recreational infrastructure. The total value of community benefit funding generated for the region in 2023 was estimated to amount to around £8.7 million.

The report highlights the potential to significantly increase this impact if the Scottish Government is to achieve its ambition of 20GW installed energy capacity by 2030. This could result in generate almost £22 million/annum in community benefit funding. This could increase significantly higher is strategic interventions are applied and good practice is adopted to ensure a consistent approach is applied.

The average value of planned community benefit funds is expected to increase to around £4,888/MW over the next few years, close to the Government recommendation of £5,000. However, while there is some evidence that the impacts of onshore renewable energy projects are being maximised, within the constraints oof the current system, the analysis suggests there is considerable scope to improve how the system operates, which could further increase the scale of benefits moving forward.

The study recommends this could be achieved by adopting a new progressive approach to delivering socio-economic and community benefits that builds on existing strengths of the system. The study identifies the following opportunities to increase impact;

- Local skills plan- could be produced by communities within their community action plans/ local place plans to enable developed to consider how they could support this (e.g. by including direct funding for local apprenticeships)
- Supply chain facilitators- local skills providers and economic development agencies could support small businesses to address challenges around bureaucracy, to promote supply chain opportunities and support formation of supply chain co-operatives.
- Regional skills action plan- Councils and UHI could create a regional skills action plan to ensure the local population has access to sector specific skills training.

Other actions identified in the study to maximise the future impact of community benefit packages relate steps that could be taken to enable broader based collaboration in project development and delivery and facilitate more strategic/ transformational projects by;

- Providing location specific support for developing local place plans
- Encouraging new community benefit funds to include provision for core funding for a development officer role to support project development.
- Encouraging new community benefit funds to allocate a proportion of funds for the joint use of groups of community councils to increase community capacity and better align strategic and local priorities.
- Encourage early engagement and agreement of a memorandum of understanding between developers and communities before planning applications are lodged.
- Remove restrictions to enable public bodies and local businesses to bid for project funding.
- Enable trusted third sector organisations to deliver specialist/ larger projects.

A new model for community benefit should build on good practice which has provided funding for community ownership of infrastructure, recreational use of tracks, seed funding towards community led housing projects, discounted electricity or energy efficiency measures, health and fitness club memberships, funding for training and development.

Summary of Stakeholder Engagement

The following were sent a copy of the schedule, and their responses are summarised below.
- Moray Council Community Wealth Building Officer
- Head of Strengthening Communities, Highlands and Islands Enterprise
- Business Gateway Manager
- TSI Moray
- Moray Council Communities Service Manager

Summary of Implications for the Proposed Plan

- To consider detailed policy approach to support national policy in delivering the Moray Community Wealth Building Strategy
- To consider policy approach to support NPF4 Policy 9 Energy and the requirements to maximise socio-economic benefits from developments.
- To consider how a strategic approach to delivering regional socio-economic inequalities can be delivered through the planning process.
- To consider how to highlight community asset transfer opportunities and link to Local Place Plans
- To highlight areas of greatest inequalities from SIMD and ensure that Community Wealth Building Plans submitted with development proposals target support towards these communities.
- To consider policy approach to link and support delivering the actions in the core documents referenced in this schedule with a focus on addressing barriers to participation, poverty and skills development.
- To embed Locality Plans into the LDP and reference in polices and delivery plan as appropriate.

Statements of Agreement

Statement of agreement received from Moray Council Community Support Unit Manager.
Suggested adding a definition of third sector organisation, which has been added on page 2.

Statements of agreement also received from Business gateway and the Moray Council Community Wealth Building officer.
Statements of Dispute
None identified.

Issue: Topic / Place	13. Productive Places – Business and Industry
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, section 15(5)(a) 'the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district'. Section 15 (5)(b) the principal purposes for which land is used.
Links to Evidence	**CD159** Moray Employment Land Audit 2023 **CD160** Moray Business Property Needs Study 2023 **CD161** Moray Economic Strategy 2022 **CD162** Moray Growth Deal Full Deal Document **CD028** Moray Local Development Plan Monitoring Report 2023 **CD026** Draft Moray Woodland and Forestry Strategy 2024 **CD033** Keith Green Energy and Infrastructure Framework – 2023 **CD063** Moray Hydrogen Strategy 2022

National Planning Framework 4 (NPF4) Context

The spatial principles within NPF4 seek to support delivery of productive places that have a greener, fairer, and more inclusive wellbeing economy. The intent of Policy 26 Business and Industry is to encourage, promote and facilitate business and industry uses and enable alternative ways of working. NPF4 states LDPs should allocate sufficient land for business and industry, taking into account business and industry land audits, in particular ensuring that there is a suitable range of sites that meet current market demand, location, size and quality in terms of accessibility and services. This allocation should take account of local economic strategies and support broader objectives of delivering a low carbon and net zero economic recovery, and a fairer and more inclusive wellbeing economy.

Summary of Evidence

Business and Industry – Context

The manufacturing sector employs more than one in ten of all employees in Moray (15.4% of employment). The largest proportion of this employment is in the manufacture of food and beverages which is a well-established sector with a number of large businesses with a long association with the region including whisky distilleries, Baxter's and Walkers. Manufacture of wood products also makes up a significant portion of manufacturing jobs and it is noted James Jones sawmill has invested in expansion. Moray also has relatively a large proportion of employment within health (15.4%), retail (11.5%), and construction (7.7%). With RAF Lossiemouth and Kinloss Barracks both located within Moray there is a significant proportion of employment within defence activities. The region's strength in defence activities has enabled the development of an aerospace sector in Moray as transferrable skills are utilised. An example of this is the commercial rocket developer Orbex at Forres Enterprise Park. Office-based sectors (associated with class 4 land use), including professional, scientific, and technical, ICT financial and insurance and business administration and support services, account for over 3,000 jobs in Moray, 7.9% of total employment. This is around half the level across Scotland as a whole (14.7%).

Moray Business Property Needs Study 2023

To inform the Moray Local Development Plan 2027 (MLDP 2027) a Business Property Needs study was commissioned to provide up to date information and analysis of current and future demand for business property in Moray. A key aim of the study is to ensure the supply of employment land within the new LDP reflects current and future business needs.

The study includes the context of the economic baseline, details of economic policy and its context, details of key sectors that are expected to key drivers of growth, a property market review which considers trends, supply, rents and viability, an assessment of the Council's own industrial portfolio, and an assessment of land allocated in the 2020 LDP which have all informed the market needs identified within the Study. Market needs was also informed by consultation via a survey of business property occupiers. In addition to the business survey engagement in the form of a workshop was held with Moray Businesses Resilience Forum with representatives from Moray Council, Highlands and Islands Enterprise, Moray Chamber of Commerce, Moray Business Women, Elgin BID, Visit Moray Speyside, Business Gateway, Skills Development Scotland, Federation of Small Businesses, Scottish Council for Development and Industry and Department of Work and Pensions. Consultations were also undertaken with local developers, HIE, the Scottish Whisky Association and Chivas Brothers.

The study noted the demand in Moray was generally focused on smaller units for small local businesses however there is also need for larger sites for inward investment and scale-up. Expansion within the whisky distilling industry has also seen demand for land for bonded warehousing.

Strategies and projects (including the Moray Economic Strategy and Moray Growth Deal) aim to create work opportunities in Moray that will support well paid work and retain the workforce. Demand is anticipated from existing businesses looking to expand with future demand also anticipated from key sectors and inward investors. The study identified the following key market needs.

Sector	Requirements	Location
Small and Medium Enterprises (SMEs)	Majority of demand for land and property across Moray.\n\nDemand primarily for small to medium standard industrial units and serviced sites for bespoke requirements. Small modern office premises in service centres.	Demand across Moray, with Elgin accounting for 60% of market and tiered focus on employment centres below that.
Energy and Renewables	Substantial growth anticipated. Sites ranging from batter storage to operation and maintenance hubs or production facilities which may include requirements for lay down space and port access.	Likely to be concentrated around Buckie due to its role in operations and maintenance.
Manufacture of food and beverages	Largest sector of manufacturing but potential for contraction in terms of jobs due to automation. Significant development pipeline for whisky storage/bonded warehouses.	Concentrated in Speyside which may require additional sites for storage or maturation.
Manufacture of wood products	Moray has above average and increasing job numbers within sector. Land hungry and possibly site specific.	Most significant demand likely Elgin, Forres and Mosstodloch.
Sustainable Tourism	Number of businesses now exceeding pre-pandemic level and could lead to demand for class 4 space, but more likely within class 7 and 11.	Potential demand around Elgin
Life Sciences	Has attracted recent investment but starting from low base so growth anticipated in the longer term. Growth Deal includes proposals for the Moray Rural Centre of Excellence for Digital Health and Care Innovation.	Forres but "living lab" test beds across Moray.
Defence Activities	Additional expected investment will increase direct and indirect employment.	Around RAF Lossiemouth and Kinloss Barracks.

Aerospace	Strengths in defence sector likely to enable development of aerospace sector alongside projects like MAATIC. Requirements include premises for manufacturing and engineering and testing facilities. Large sites required.	Around Forres and wider supply chain.

Moray's employment land demand is demonstrated in enquiries, take-up, and development. The study notes that employment land take up in Moray outperforms comparable regions (including Perth and Kinross, East Lothian, and South Ayrshire) and has increased recently as occupier modernisation and growth take effect. Moray also has existing land hungry industries. To accommodate these trends the study recommends a rate 5-6 hectares of employment land per annum. This estimated annual requirement is split across market areas on the following basis.

Elgin	Forres	Bucke	Keith	Speyside
3.2ha	0.9ha	0.9ha	0.5	0.5

Effective Employment Land Supply 2023

Market Area	Marketable/Effective (Net figure in hectares)	Number of Sites	Estimated Annual Requirements	Available Supply in years
Elgin	57.61	10	3.2	18 years
Forres	13.02	1	0.9	14 years
Buckie	22.34	4	0.9	24 years
Keith	5.3	4	0.5	10 years
Speyside	1.6	2	0.5	3 years

There have been no applications for new industrial estates since adoption of MLDP2020 despite some of these containing a mix of uses to try to aid viability and support initial site servicing. Interest and development on the Elgin Business Park at Barmuckity has been strong with most sites in the first phase now either developed, in progress or under offer. This raises the issue of "where next" for Elgin.

The Business Property Needs Study noted that given average industrial and office rents across Moray and current construction costs it would be challenging to build viable new industrial or office premises. Across the UK higher interest rates have reduced property values while at the same time costs have risen, this has suppressed developer activity. It is assumed in time this will alleviate and new development by the private sector is again positive and viable in Elgin. However, the study notes that intervention will still be required to open up and service sites in Elgin and to support development of premises in lower tier settlements and specialist properties. Where intervention is required, the Council will work with other partners on a case-by-case basis to explore opportunities.

Employment Land Audit 2023
The 2023 Employment Land Audit sets out the effective land supply i.e. the supply that has a secure planning status (designated or planning consent), can be serviced within 5 years and is accessible. These figures reflect classes 4 business, 5 general industrial and 6 storage or distribution.

The Business Property Needs Study highlights that the majority of demand is likely to be for class 5 and 6. Therefore, using the estimated annual requirements highlights the need to identify additional general industrial land in all areas if a 15-year supply is identified on adoption of the plan in 2027.

Effective Employment Land Supply 2023 - Split General Industrial and High Amenity					
Market Area	General Industrial	Number of sites	Supply in years	High Amenity	Number of sites
Elgin Market Area	41.06	9	12 years	16.55	3
Elgin	27.16	7		16.55	3
Mosstodloch	12.8	1			
Troves	1.1	1			
Forres	2.75	1	3 years	10.27	1
Buckie Market Area	15.32	2	17 years	7.02	2
Buckie	15.32	2		6.37	1
Cullen				0.65	1
Keith	3.55	3	7 years	1.75	1
Speyside Market Area	0.6	1	1 year	1	1
Aberlour				1	1
Rothes	0.6	1			

Moray Economic Strategy 2022

Moray Community Planning Partnership updated the Moray Economic Strategy in 2022 taking into consideration the impacts on Moray from the Covid-19 pandemic, Brexit, and the cost-of-living crisis. The overall vision is for Moray to be *"A distinctive and attractive place to live, work, operate a business or social enterprise, study, and visit.* "Five priority areas for action are identified as:

- Moray Growth Deal projects
- A sufficient labour market.
- Ensuring alignment between skills provision and the changing economy
- Integrated approach to delivering transition to net zero and community wealth building and
- Supporting productivity growth.

To support productivity growth the strategy highlights the need to increase the number of start-ups, as well as the number of scale ups to help them become larger local employers. To enable this Moray will require suitable employment land to support small and medium size businesses.

The aim to deliver on transition to net zero highlights the opportunities within the renewable energy sector with expected growth in onshore wind, offshore wind, and hydrogen. As these sectors grow, they will create demand for land.

Moray Growth Deal

The Moray Growth Deal builds on the existing strengths of Moray's culture, tourism and manufacturing sectors, plus development of other sectors. It aims to address challenges to facilitate economic growth that is sustainable, fair and inclusive. The deal will see Investment of over £100 million across eight strategic projects:

- Moray Aerospace, Advanced Technology and Innovation campus (MAATIC).
- Manufacturing Innovation Centre for Moray (MICM)
- Business Enterprise Hub
- Digital Health
- Cultural Quarter
- Housing Mix Delivery
- Early Years STEM
- Bus Revolution

MAATIC, MICM, the Business Enterprise Hub and Digital Health projects will require commercial/ industrial space and as the sectors associated with the project develop this is likely to increase demand for employment land.

Monitoring Report - Pressure for other Uses on Industrial Estates

A review of data in 2023 for the Monitoring Report from the Council's Address Gazetteer has allowed a high-level analysis of non-industrial/business uses (i.e. not use class 4 business, use class 5 general industrial, or class 6 storage or distribution) on industrial estates to identify what types of non-industrial/business uses are present on industrial estates and where the proportion of these uses is greatest.

- This highlights that there is pressure for restaurants/cafes, showrooms, and leisure activities including gyms.
- The majority of sites identified in LDP2020 as Industrial Estates have predominantly employment uses (i.e. over 85% of addresses identified within the Gazetteer were for employment uses within class 4, 5 and 6).
- The exceptions to this are I4 Tyock, I5 Pinefield, I6 Linkwood East in Elgin and I4 Shore Street Lossiemouth where a greater proportion of addresses were for non-employment uses. Within I4 Shore Street there is a high proportion of residential addresses.

Where there are greater numbers of "other uses" this can change the character of the industrial estate and undermine the intended use. This could result in making it more difficult for heavier industrial uses to locate to these industrial estates and mean new employment land is taken up more rapidly.

There is also increasing pressure for battery storage which has impacted on industrial sites. This has been particularly prevalent in Keith but with more recent interest on industrial sites within other towns including Elgin. Battery storage is classed as a generating station and therefore does not fall within the use classes normally associated with industrial estates (i.e. use class 4 business, use class 5 general industrial, and class 6 storage or distribution). The level of employment tends to be low relative to the scale of this type of development. Battery storage can use up significant areas of industrial sites and has the potential to result in the LDP being unable to meet demand for uses within use class 4, 5 and 6 that potentially employ more people and are more suited to designated industrial estates.

Rural Development – Moray Local Development Plan Monitoring Report 2023

There are specific challenges and pressures that Moray faces around rural business development. These range from small local businesses to the large-scale expansion and storage requirements of the whisky industry. There is also significant pressure from the energy sector including battery storage, anaerobic digesters, and development to support the National Grid. The issue is covered in more detail within schedule 16 that covers Rural Development.

Draft Moray Woodland and Forestry Strategy

The Moray Woodland and Forestry Strategy identifies that forestry is a mature sector of the economy generating more than £39 million per year and providing direct employment for almost 1,000 people.

The sector includes primary forestry and timber extraction, processing of timber and manufacture of woodland based products, services provided to support forestry and tourism related activity. Moray accounts of around 6% of all forestry and logging related employment across Scotland, making the sector five times more concentrated than the Scottish average. The region plays an important role in underpinning the wider UK forestry and associated timber construction sectors. It is home to a well-established arboriculture sector that incorporates some of the UK's largest tree nurseries as well as some thriving and innovative timber engineering operations which make an important contribution to the construction sector.

Enhancing the economic potential of woodlands is a key objective of the strategy with the following aims to
- Increase forestry related skills and education and boost employment in the sector.
- Encouraging the increased use of local timber in processing and construction.
- Grow the number of sustainable timber processing and manufacturing businesses in Moray.

Delivery actions include:
- Increasing local opportunities for accessing forestry related training
- Creation of a local construction forum to increase awareness of locally gown timber products.
- Develop a campaign to promote use of quality locally grown timber in construction.
- Support the expansion of Moray's forestry cover.

Keith Green Energy and Infrastructure Framework

The Keith Green Energy and Infrastructure Framework was approved by the Planning and Regulatory Services Committee on 19th December 2023. The framework was developed in response to increasing development pressures in the immediate vicinity of Keith and Blackhillock. This included pressure on designated employment sites for battery storage. The framework seeks to guide development proposals for grid infrastructure and energy systems/storage associated with the most appropriate locations. A landscape sensitivity assessment was used to identify development sites for a range uses along with landscape mitigation.

Public Engagement

Public drop in exhibitions were held across 8 towns with over 300 people attending. Comments relating to employment and the economy were on the following themes.
- The need to create more full-time jobs was identified with the prevalence of part time posts seen as contributing to the gender pay gap.
- Investing in broadband and co-working spaces to encourage remote workers to the area.
- A green energy hub for Speyside was suggested to promote innovative solutions and help exciting job to encourage young people to stay.

A number of comments were also submitted through the Call for Ideas on supporting the economy.
- Moray should be a leading demonstration council area in Scotland (and in Europe) in terms of climate resilient, flourishing new (green) economy, demonstrating the empowerment and resilience of entrepreneurial, socially inclusive, community-led, net zero, ecologically regenerative development and innovation.
- Success of Elgin Business Park noted and comment that enough new employment needs to be identified. Elgin Business Park was seen to have attracted business over vacant brownfield sites.
- Develop a circular economy.
- More resources and grants for small businesses.

Summary of Stakeholder Engagement

- Highlands and Islands Enterprise – see statement of agreement below.
- Moray Chamber of Commerce – no response received.

Summary of Implications for the Proposed Plan

Additional Employment Land Requirements

The employment land requirement is calculated to allow a 15-year supply from adoption of the plan. This provides a generous supply and ensures a continuing and flexible supply towards the end of the 10-year plan period. Taking into account the recommended annual supply within the Business Property Needs Study, the key market needs identified in the study and the Marketable/Effective supply within the 2023 Employment Land Audit the additional employment land requirements are identified for each market areas as follows.

Minimum Additional Requirements per Market Area

- **Elgin Market Area** – identify minimum of 22.4 ha of general industrial land, with a focus on land within Elgin itself. The Elgin Market Area, and specifically Elgin itself, is likely to be the focus of demand. This will include demand across all sectors and specifically SMEs looking for small and medium sized industrial units and serviced industrial space.
- **Forres Market Area** – identify minimum of 14.4ha of general industrial land. Given the potential demand from the aerospace sector for larger sites consideration will also need to be given to the identification of additional land that can accommodate higher amenity uses.
- **Buckie Market Area** – identify minimum of 1.8ha of general industrial land. The existing LONG allocation could be brought forward to meet this requirement; however, consideration should also be given to additional sites that would meet the needs of the potential demand from the energy and renewables sector.
- **Keith Market Area** – identify minimum of 6ha of general industrial land. The existing LONG could be brought forward to meet some of this requirement however additional sites will also be required. Given the significant constraints around Keith consideration may require to be given to sites out with the settlement or identification of search areas.
- **Speyside Market Area** – identify minimum of 9ha of general industrial land. Historically it has been challenging to identify land within this market area. A new approach that identifies broad areas of search around key settlements with specific design criteria could be considered.
- **Inward Investment Sites** – Sites with potential for large scale inward investment (circa 40ha) to be identified.

Site Delivery

As identified in the Business Property Needs Study development viability due to low rents/low land value and high construction costs hampers delivery of sites. The new Local Development Plan could consider identifying land for employment uses alongside housing expansion with requirements for developers to service land as part of a comprehensive solution to delivery of a neighbourhood that supports local living. As such the servicing of employment sites would be enabled by housing development on other parts of the development area reducing the need for intervention. Servicing of employment land as part of wider housing/neighbourhood development would be identified as a requirement on a site-by-site basis and would require to be subject to a legal agreement associated with the wider development site.

Other options that require to be considered to support delivery of site infrastructure and opening up industrial sites are identification of potential partners and funding sources. Consideration of the use of compulsory purchase powers may also be required where landowners are unwilling to sell or are holding out for higher land values. Where intervention is required, the Council will work with other partners on a case-by-case basis to explore opportunities.

Other Uses on Industrial Estates

NPF4 policy 26-part c allows "other employment uses" to be supported where they do not prejudice the primary function of the area and are compatible with the business/industrial character of the area. Current LDP policy has similar criteria but also requires consideration to be given to the current supply of serviced employment land. It also restricts retail uses to those ancillaries to the principal use (i.e. manufacture, wholesale). The difference in current policy position and NPF4 combined with the pressure on industrial estates set out above could justify a more tailored local policy that provides clearer and more stringent criteria in respect of other uses. This could include requiring a sequential approach to "other uses" so that applicants are required to demonstrate that other sites are not suitable or available. In order to pro-actively plan for uses like battery storage and anaerobic digestion consideration will be given to the identification of sites could also reduce the pressure on industrial estates.

Statements of Agreement

Highlands and Islands Enterprise (HIE) consider that reference should be made to the
- Enterprise Park, Forres (including the Masterplan and Design Guide)
- Buckie Harbour Masterplan
- Moray Hydrogen Strategy

HIE note that the Enterprise Park, Forres is becoming a major manufacturing base for vertical launch and note the Moray Hydrogen Strategy could be quite transformative along the A95 and A96 with potential pilot sites in Aberlour and Elgin.

Moray Council note that the Enterprise Park Forres and the potential associated with aerospace sector is discussed within the Moray Business Needs Study. It is noted that the Enterprise Park Forres Masterplan/Design Guide is an ongoing piece of work and to date has not been agreed for publication/consultation. As this work progresses it will inform the new LDP. The needs of the renewables sector associated with Buckie harbour supporting the operations and maintenance of offshore windfarms are also identified within the Moray Business Needs Study. It is noted that feasibility work around the Buckie Harbour Masterplan is ongoing and once suitable options for usage and capacity are determined the draft Masterplan document developed in August 2023 will be updated. The ongoing work on the Buckie Harbour Masterplan will inform the new LDP. The Moray Hydrogen Strategy is highlighted within Schedules 5 Energy and 10b Transportation. To ensure a proportionate approach within the Evidence Report Moray Council did not include these within this schedule. Moray Council do not object to inclusion of the Moray Hydrogen Strategy being included within the schedule and have added this to the Links to Evidence.

Statements of Dispute

None identified.

Issue: Topic / Place	14. Town Centres and Retail
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, section 15(5)(a) 'the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used.
Links to Evidence	**CD163** Moray Retail Study 2021 **CD164** Moray Town Centre Health Check 2023 including Moray Town Centre Perception Study 2023 **CD089** Aberlour Town Centre Improvement Plan – 2022 **CD090** Buckie Town Centre Improvement Plan – 2022 **CD091** Dufftown Town Centre Improvement Plan – 2022 **CD092** Forres Town Centre Improvement Plan – 2022 **CD093** Keith Town Centre Improvement Plan – 2022 **CD094** Lossiemouth Town Centre Improvement Plan – 2022 **CD088** Elgin City Centre Masterplan 2021 **CD162** Moray Growth Deal – Full Deal Document **CD001** Moray Local Development Plan 2020

National Planning Framework 4 Context

NPF4 policy 27 City, town, local and commercial centres seek to encourage, promote and facilitate development in our city and town centres by applying the Town Centre First approach to help centres adapt positively to long-term economic, environmental and societal changes and by encouraging town centre living.

NPF4 states LDPs should support sustainable futures for city, town, and local centres, in particular opportunities to enhance city and town centres. Where appropriate they should support proposals for improving the sustainability of existing commercial centres where appropriate. LDPs should identify a network of centres that reflect the principles of 20-minute neighbourhoods and the town centre vision. LDPs should be informed by evidence on where clustering of non-retail uses may be adversely impacting on the wellbeing of communities. They should also consider, and if appropriate, identify any areas where drive-through facilities may be acceptable where they would not negatively impact on the principles of local living or sustainable travel.

Policy 28 Retail of NPF4 looks to encourage, promote, and facilitate retail investment in the most sustainable locations that are most accessible by a range of sustainable transport modes. NPF4 states LDPs should consider where there may be a need for further retail provision, this may be:
- where a retail study identifies deficiencies in retail provision in terms of quality and quantity in an area; or
- when allocating sites for housing or the creation of new communities, in terms of the need for neighbourhood shopping, and supporting local living.

LDPs should identify areas where proposals for healthy food and drink outlets can be supported.

Summary of Evidence

City, Town, Local and Commercial Centres

Moray Context

Town Centre Health Checks have been completed biennially since 2010. The exception is 2020 when covid restriction meant it was not possible to complete this with the audit being completed in 2021 as part of the Moray Retail Study. This includes monitoring of the diversity of uses across town centres and vacancies. Past health checks have also monitored footfall although this was not possible for the 2023 health check due the unreliability and vandalism of the counters.

As identified in the Moray Retail Study 2021 Elgin City Centre is the most important location for both retail and services with Moray accounting for 28% of the retail floorspace and 31% of the turnover. However, whilst the total retail and services floor area at Edgar Road Commercial Centre is half that of the town centre the retail turnover is only slightly less than the City Centre. Buckie town centre is the largest both in terms of retail floorspace and turnover when compared to Forres and Keith town centres. Provision is also distributed between smaller towns with Lossiemouth, Aberlour, Dufftown and Fochabers having distinct "High Streets". Within Elgin and Forres there are a number of small neighbourhood centres that have been designed to meet the day to day needs of residents.

Town Centre Perception Survey

A town centre perception survey in December 2023 was completed with 646 returns. This covered the main town centres of Elgin, Buckie, Forres, Keith, Lossiemouth, Aberlour and Dufftown. People were asked to rate ten aspects of the town centre by giving a score out of five. The survey found that public transport was rated best in Keith but worst in Elgin. None attained a good score for daytime events or evening economy. Accessibility was rated fair or good for all towns. Only Aberlour scored good for the retail offering although it is noted this was a low response rate. For all seven towns, the main reason for visiting was for shopping. As expected for Elgin being the main centre of employment, the next main reason for visiting Elgin was for work. Shopping was identified as needing improvement in all town centres. Cleanliness came out second as most in need of improvement everywhere, particularly in Elgin. Car parking (particularly in Elgin) and restaurants (in Buckie) came third as requiring improvement.

The Council is developing a new Monitoring and Evaluation Framework for Elgin Town Centre to ensure the benefits of significant investment through the Levelling Up Fund and Long-Term Plan for Towns are evaluated.

Town Centre Health Check – Diversity of Use and Vacancies

The 2023 Town Centre Health Checks demonstrate that Moray's main town centres continue to support a wide range of retail, service and leisure uses. The national trends identified within the Moray Retail Study of a reduction in national multiple retailers, particularly in comparison retailing, can also been seen when looking at the space in use data. This is particularly evident at the St Giles Centre within Elgin City Centre where a number of national retailers including New Look, Semi Chem and Monsoon have left. This has led to a very high vacancy rate within the centre which has been highlighted in the Town Centre Health Check since 2018. Consideration to the future uses of the St Giles Centre is required.

The Town Centre Health Check includes identification of vacant former convenience, comparison, retail service or leisure service units. The 2023 results set out below show that since monitoring began in 2010 Elgin, Buckie and Forres have recorded the highest number of vacant units with Lossiemouth and Keith bucking this trend. The smaller towns of Dufftown, Fochabers, and Rothes have also recorded the highest number of vacant units however it is noted this is 1 or 2 units more than previous Health Checks.

Town Centre	Number of Vacant Units	Vacancy Rate %	Comparison to previous health checks
ELGIN	40	16%	Highest number of units recorded vacant – previous highest was 39 units in 2014

BUCKIE	11	1%	Highest number of units recorded vacant and equal to numbers recorded in 2014
FORRES	18	16.2%	Highest number of units recorded vacant – previous highest was 12 recorded in 2021
LOSSIEMOUTH	5	9%	Highest recorded was 8 units in 2014 and 2016
KEITH	7	8.5%	Highest recorded was 12 units in 2021 by Keith Hargest Ltd for the Moray Retail Study.
ABERLOUR	0		Highest recorded is 1 in 2012 and 2018.
DUFFTOWN	5	11.6%	Highest number of units recorded vacant – previous highest was 4 in 2012 and 2016
FOCHABERS	3	11.5%	Highest number of units recorded vacant – previous highest was 1 in 2012 to 2018.
ROTHES	5	21.1%	Highest number of units recorded vacant – previous highest was 3 in 2012, 2014 and 2018.

It its noted that a number of Church of Scotland churches are closing with congregations merging and using fewer buildings. A number of church buildings affected are within town centres – these include St Giles Church at the very centre of Elgin High Street and Elgin High Church of South Street which closed at the end of 2023. The impact of large prominent buildings being vacant has the potential to impact on the appearance and perception of the town centres.

Clustering of Non-Retail Uses

The 2023 Town Centre Health Check does not identify any issues of clustering of betting offices or high interest money lenders within town centres. Within Buckie and Elgin, a single betting shop was identified in each town centre with none identified in Forres, Keith or Lossiemouth. The only unit resembling a high interest money lender is Ramsdens in Elgin who offer pawnbroking loans. The scale of these uses is not considered to be adversely impacting communities at present but will continue to be monitored through biennial Town Centre Health Checks.

Takeaways make up the following proportion of retail units within town centres. These make up less than 10% of each town centre with the exception of Lossiemouth. This perhaps reflects the concentration of tourism facilities in Lossiemouth and also the extensive town centre boundary due to the concentration of uses on Clifton Road and along Queen Street. In the majority of town centres while some takeaway units are located close to each other this is not to the extent that distinct clusters have formed with only two units at most in immediate proximity. All the takeaways identified in Lossiemouth town centre were on Queen Street these are spread relatively evenly across the length of a relatively long street such that at present there are no distinct clusters. The western end of Forres High Street 129-149 High Street has three takeaways in close proximity but not immediately neighbouring where additional takeaways could result in a cluster forming. Given the level of vacant units across all the town centres if a number of these were to be occupied by takeaways there is the potential for this to result in clusters forming that would be detrimental to the character and amenity of centres.

It is noted the analysis does not include restaurants and cafes which offer takeaway services in addition to the "sit in" offer.

Location	Number of Units	% of comparison, convenience, retail service and leisure service units
Elgin City Centre	16	6.5%
Buckie Town Centre	7	8.7%
Forres Town Centre	7	6.3%
Keith Town Centre	5	6%
Lossiemouth Town Centre	7	12%

Town Centre Health Checks do not cover smaller local or neighbourhood centres. It is observed that there are individual takeaways outwith town centres with some of these located with other shops/commercial units or sitting on their own. As these are largely individual units' clusters have not formed, however, local knowledge identifies that the shopping parade on Springfield Road/Glenmoray Drive has a high proportion of takeaways with three of the six units being takeaways with the other units made up of a pub, newsagents, and small convenience store (Morrison's Daily). The proximity to Elgin High School raises a concern about availability of fast or convenience foods and the impacts this has on healthy diets.

Drive Throughs

Drive throughs within Moray are concentrated along the A96 to the east of Elgin. These have developed incrementally along a 2.5km stretch of the A96. Furthest east is a Starbucks at Elgin Business Park at Barmuckity that is associated with a garage, at the Linkwood East Industrial estate close to the edge of Elgin is a KFC and Costa with consent for a Subway also at this location, McDonalds sits slightly further into Elgin on the Linkwood Industrial estate, whilst not a drive through at the entrance to the Morycroft industrial estate is a Harry Gow takeaway in a former petrol station, and then closer to the centre of Elgin there is Burger King at Ashgrove. These are all visible from the A96 and will cater for people travelling along the route. However, observed behaviour suggest that significant amount of the customer base is local. Given these are generally located within industrial or business areas or require access to be taken over the busy A96 from housing areas they do not contribute positively to the principles of local living.

Network of Centres

The Moray Retail Study 2021 included a review of the network of centres in section 4.9 onwards. This included reviewing the number of retail units and turnover of significant retail centres. This analysis identified 24 retail locations across Moray that could be classed into five groups. The smallest of these other locations were considered to have very limited retail/service offer and turnover levels that were not sufficient enough to justify identification as a village or local centre. The study also identified more local and village centre which the study recommends are added to the network of centres already identified within MLDP2020. This would mean local centres including Cullen, Findhorn, Hopeman, and Lhanbryde as well as the local centres within Elgin (Bishopmill and Southfield Drive/Thornhill) and Regent Street in Keith being identified as part of the network of centres.

The Moray Retail Study recommends the network of centres below.

Category of Centre	Function/Role of Centre	Locations
City/Regional Centre	Principal retail location for Moray. Provides wide range of retail, retail service and non-retail public and commercial services and facilities.	Elgin City Centre

	Provides a focus for the Elgin and Moray wide community and as a focus for transport.	
Town Centres	Provide a wide range of retail, retail service, and non-retail public and commercial services and facilities. Provide a focus for the local community (town and immediate rural hinterland) and for local transport networks.	Buckie Forres Keith Lossiemouth
Local and Village Centres	Provide a limited range of retail facilities and other services/facilities – primarily meeting some of the day to day needs of the local community	<u>Elgin Local Centres</u> Bishopmill Thornhill/Southfield Drive <u>Keith Local Centres</u> Regent Street <u>Village Centres</u> Aberlour Cullen Dufftown Findhorn Fochabers Hopeman Lhanbryde Rothes
Commercial Centre	Retail development (either purpose built or well-defined groups of separate units) that serve one or more specific retail market sectors with relative wide catchment areas	Edgar Road (comprising the Elgin and Springfield Retail Parks and adjoining areas)

It is noted that there are other small concentrations of shops that were not identified within the Retail Study that may merit being identified as Local Centres due to their observed function within the neighbourhood. These include the small shopping parade on Springfield Road/Glenmoray Drive in Elgin, the shops at Newmill Road in Elgin, the shops and services at Ferrylea in Forres and the shop units focused around the garage in Mosstodloch. These shops serve and would have been designed to serve the daily needs of the surrounding neighbourhood.

Core Retail Areas

The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Miscellaneous Amendment Order 2023 has provided greater flexibility to the use of certain buildings within centres to support the resilience, regeneration and recovery of centres. This gives a lot more flexibility to businesses to change between retail, business, financial / professional services, food and drink and other high street uses without requiring planning consent. These changes were already largely supported by policies within the Moray Local Development Plan 2020 in defined Town Centres and Core Retail Areas (CRA), albeit consent was required. However, this did not extend to Use Class 4 Business and permitted development rights would support a change from retail uses to class 4 Business which would allow offices, research and development and light industrial up to 300 sqm.

Town Centre Improvement Plans and Town Centre Taskforce

The Council has approved plans to support town centre regeneration in the form of Town Centre Improvement Plans (TCIPs) for Forres, Buckie, Lossiemouth, Keith, Aberlour and Dufftown. These Plans reflect the key themes emphasised in NPF4 including town centre regeneration, re-use of vacant and derelict properties, reducing carbon, promoting biodiversity and active travel. The Council has secured external funding from a number of sources to support delivery of the TCIPs. This includes funding from the Scottish Government Place Based Investment Programme (PBIP) and UK Shared Prosperity Fund. Using some of this funding the Moray Town Centre Capital Grant Scheme was launched in November 2023 with 43 applications received by the 8th January 2024 application deadline. The grants of up to 50% of eligible costs aim to support existing and new businesses, encourage the redevelopment and reuse of vacant properties to support town centre living and improve the attractiveness of the town centres.

Following a Town Centre Summit organised by the Chamber of Commerce and Moray Council a Moray Town Centre Taskforce has been established bringing together a range of stakeholders to support the regeneration projects set out within the TCIPs as well as any other projects that emerge from consultation with communities and stakeholders.

Elgin City Centre Masterplan

Elgin City Centre Masterplan was prepared as a partnership between Elgin BID, Elgin Community Council and Moray Council informed through engagement and consultation with the public. The masterplan was approved in November 2021. The masterplan has a vision to transform Elgin City Centre into a successful, well connected, healthy, green, attractive, inclusive and carbon conscious centre offering a variety of attractions where people of all ages and abilities shop, live, relax and do business. Projects within the masterplan are grouped under four headings with a range of projects proposed in each.

- **Core Retail Area** - The range of projects aim to transform the centre of Elgin into a vibrant place that supports economic activity and encourages people to live, work and use the centre during the day and evening. Projects are focused on redeveloping or bringing empty properties back into use for both business and residential use, addressing blank facades onto the A96, improving the attractiveness of streets including South Street and Batchen Lane/Thunderton Place, supporting active and sustainable travel, and taking a consistent, fresh approach to signage, street furniture, public art, lighting and planting.
- **Cultural Quarter -** The Cultural Quarter has six key elements which are collectively intended to develop a creative arts centre, develop an evening economy in Elgin City Centre, attract and support tourists and encourage them to stay longer and improve connections between the High Street and Lossie Green/ Cooper Park. The six elements are Elgin Town Hall, Grant Lodge, new hotel, Elgin Museum, Cooper Park and an art gallery.
- **Cooper Park** -The Masterplan aims to refresh Cooper Park and re-connect it to the High Street by creating an exciting and attractive cultural and heritage offer for the community and visitors, catering for all its users, young children, teenagers, families, and those with disabilities.
- **Other Projects** – These projects include enhancement of gateways and roundabouts, redevelopment of former sawmill and auction mart, public toilets, and gull control.

As noted above successive Town Centre Health Checks have identified high and increasing vacancies within the St Giles Centre. The centre has been up for auction twice. The masterplan identifies the St Giles Centre as a project and consideration needs to be given to new/diversified uses of the centre which occupies a significant city centre footprint.

In November 2023 Moray was provisionally awarded £18.3 million Levelling Up funding (LUF) in the fund's third round. The Council is currently going through the validation process with the UK Government. LUF funding will help to deliver key projects within the Elgin City Centre Masterplan. The LUF bid includes redevelopment of vacant and derelict buildings on South Street and the former Jailhouse nightclub for commercial, retail and residential. Other projects include a creative arts centre, traffic control measures, active travel enhancements (Lossie Wynd, Commerce Street, Moss Street and railway bridge), transformation of Cooper Park Pond, extension and redevelopment of Cooper Park toilets to café and a natural flood management scheme at the former sawmill and Elgin auction mart.

Elgin is one of seven towns in Scotland to receive £20 million funding from the UK Government Long-Term Plan for Towns. The Long-Term Plan requires a Town Board to be established to draw up a long-term Town Plan to invest in and regenerate Elgin with this based on the priorities of local people. The Town Plan is to be subject to consultation with local people. The £20 million is an endowment style fund to support the long-term Town Plan over 10 years. A Town Board is in the process of being established to bring together community leaders, local employers, the Council and the local MP. The Town Plan will then be developed and should be in place by the 1st of August.

It is proposed that work to review the Elgin City Centre Masterplan will begin in 2024.

Moray Growth Deal

The Moray Growth Deal will see significant investment across eight projects. This includes the Cultural Quarter project that will see Elgin Town Hall redeveloped and Grant Lodge brought back into use with the elements of the project linked together by enhanced public spaces and connections to ensure easy and safe walking and cycling to the town centre. The Business Enterprise Hub is to be developed in the centre of Elgin. The Housing Mix project is also looking at refurbishment of properties in or on the edge of town centres to provide affordable and private housing to support town centre regeneration, encourage more economic activity in town centres and support development of an evening economy.

Public Engagement

Public drop in exhibitions as part of early engagement on the new Local Development Plan were held across 8 towns from March 2023 to September 2023 with over 300 people attending. Comments relating to town centres were on the following themes.
- The need to create to support the nighttime economy and culture to increase footfall and vibrancy in Moray's town centres was viewed as important.
- In Elgin comments included addressing parking, traffic control to allow outdoor dining, connections over the A96, relocation of businesses from the St Giles and finding an alternative use for the building, improving and tidying up the appearance of buildings and centre, and toilet provision were identified.
- In Forres comments included re-opening the Falconer Museum, toilet provision and demand for theatre, cinema, art and exhibition space.
- In Buckie improving lighting at Cluny Square was highlighted.
- In Keith reopening toilets, providing water stands and EV charging were highlighted.

A number of comments were also submitted through the Call for Ideas on supporting the town centres.
- Suggestions for pop up shops and to make the St Giles centre in Elgin a gallery.
- Later shop opening and pedestrianisation of town centres.

Retail

Moray Retail Study 2021 - Further Retail Provision

The Moray Retail Study 2021 updated the Strategic Retail Model and compared existing and future expenditure and notional average sales for existing and committed floorspace to provide an indicative quantitative basis for assessing the general level of retail deficiencies and identify where there is capacity for increased retail floorspace.

At a Moray level there are no quantitative or qualitative retail deficiencies for convenience goods (i.e. food, newsagents etc). Speyside, Lossiemouth and Fochabers have a quantitative deficiency but are within the catchment area of superstores in Elgin. In Aberlour, Dufftown, Fochabers, and Rothes there is a qualitative deficiency in terms of lack of small supermarket/large convenience-format store in the region of 600-1,000 sqm compared to the existing smaller formats. If this qualitative deficiency requires to be addressed requires to be considered. It is noted that the study considers the greatest potential would be for existing operators developing stores in place of existing stores.

At both a Moray level and for individual towns there is a significant retail deficiency for comparison goods (clothing, footwear, furniture, electrical good etc). However, market demand and national trends are unlikely to support the scale of deficiency identified and the study considers there to be a low likelihood of any significant change to comparison retail space provision in most towns. In fact, within Elgin current national trends would suggest multiple national retailers are more likely to reduce space occupied. There is limited requirement for additional floor space in Buckie, Forres and Keith however if there is demand this is likely to be for bulky goods given the lack of local provision.

Moray Retail Study 2021 - Neighbourhood Retail

The Moray Retail Study included a review of five masterplans to assess retail and commercial floorspace requirements for the new neighbourhoods and taking into account local living concepts. The study considered experience from other major residential development in Scotland, along with deficiencies in the areas proposed, turnover potential based on market share of expenditure generated by new housing and broader evidence of market demand for retail/commercial space. information from the Strategic Retail Model on the level of retail space particularly convenience.
The principal findings were that;

- For retail and service units trade can be generated from: the proposed new housing; existing residential areas within 10-minute walking distance (i.e. in accordance with 20-minute neighbourhood principle, and potentially wider than this); and pass-by trade.

- For modern convenience-format stores approximately 900 dwellings are required for the store to have sufficient trade to be viable. Smaller stores can be supported with lower numbers of new housing depending on the range of goods retailed.

- For other commercial uses (retail and community services – Classes 2, 3 and others), the diversity of potential occupiers makes it more difficult to generalise. However, for uses such as health and beauty, café and hot food takeaway most trade will be generated from within the new development as walk-in trade.

- For these other commercial unit(s) flexibility is required to maximise the attractiveness of the units to potential occupiers. This should include any of Class 1, Class 2, Class 3, hot-food takeaway, and other community-based businesses (e.g. dentists, clinics, vet etc). These units could be occupied at an earlier stage but will, in all likelihood, be dependent on custom generated by the new residential development. On this basis the study considers it appropriate that these units should only be available after approximately 150 residential units are built and occupied.

- There is very wide variation in the total quantity of space that can be provided for retail and commercial services in developments.

- Provision of commercial units too early will result in units remaining vacant for a number of years which will reduce the attractiveness of the development and could, potentially, result in the deterioration of units thereby undermining the potential to find occupiers.

The recommendations for the masterplan areas/new neighbourhoods included the following:

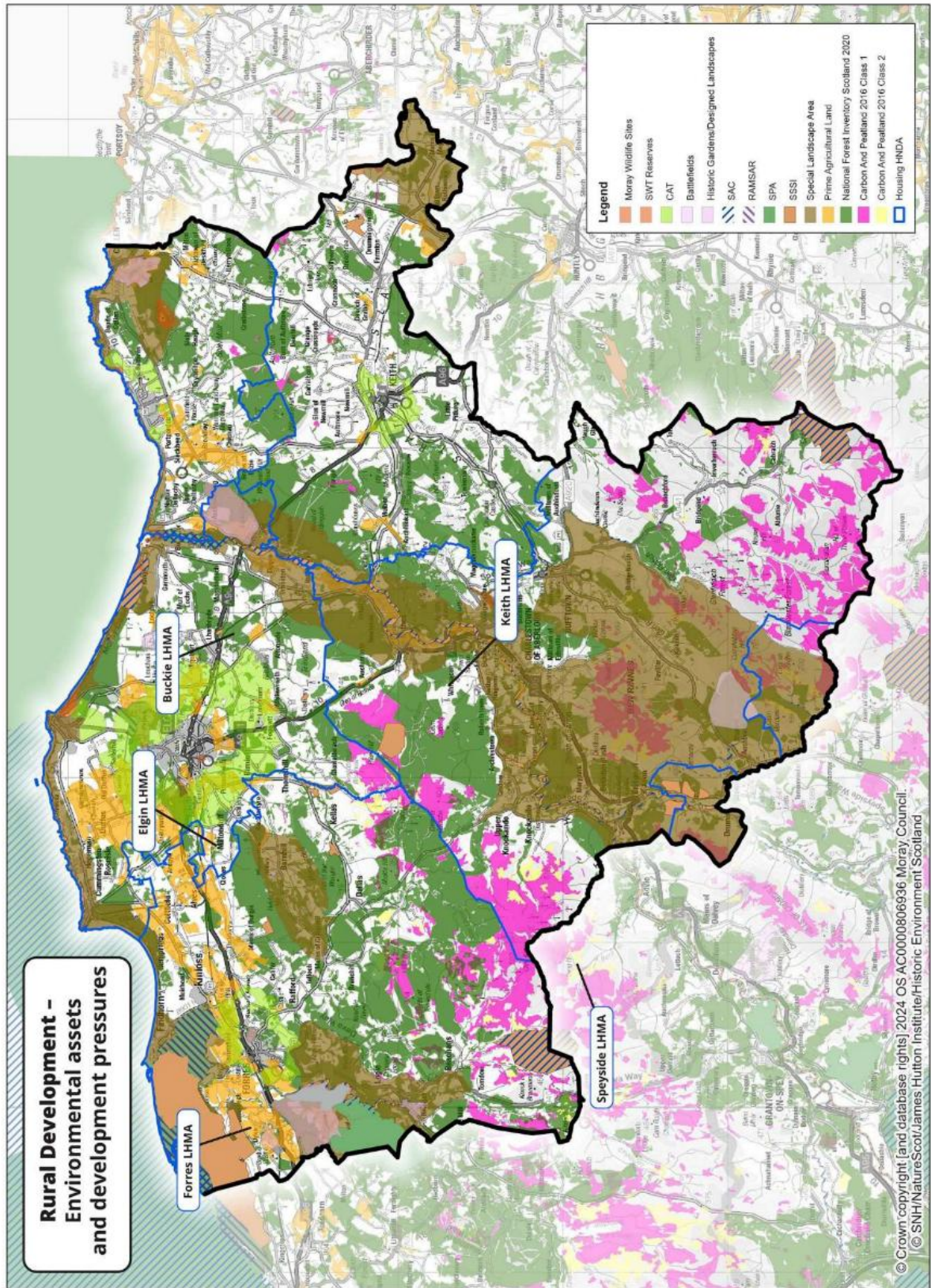|	
Findrassie, Elgin	- Total convenience floorspace 350-500 sqm GFA which could comprise a modern convenience format plus a small number of smaller additional units. - Additional space can be provided to accommodate retail, leisure and business services and comparison goods retail. - Total floorspace in region of 1,200-1,500 sqm GFA - Consideration to be given to other uses including public house/bar and community uses. - Phasing – initial commercial space (300-400sqm GFA) after 450th house and convenience format store by completion of 900th house.
Elgin South	- Total convenience floorspace of ca. 500-700 sq m GFA which could comprise a modern convenience-format store plus a small number of additional, smaller units. This could include convenience-format stores in each village centre. - Additional space can be provided to accommodate retail, leisure and business services and comparison goods retail. - Total floorspace in each of the two village centres should be in the region of 1000-1250 sq. m GFA. - Consideration to be given to other uses including public house/bar and community uses. - Phasing – initial commercial space (300-400sqm GFA) after 450th house for each development areas (east and west villages) and convenience format store by completion of 900th house for each development area.
Buckie South	- Total convenience floorspace of ca. 150-250 sq. m GFA which could comprise a small convenience-format store or one or two smaller units. - Additional space can be provided to accommodate retail, leisure and business services and comparison goods retail. - Total floorspace in region of 500-750 sqm GFA - Initial commercial space (ca 150-300 sq. m GFA) could be provided by the completion of the initial phase of development given existing residential areas.
Lochyhill Forres	- Total convenience floorspace 350-500 sqm GFA which could comprise a modern convenience format plus a small number of smaller additional units. - Additional space can be provided to accommodate retail, leisure and business services and comparison goods retail. - Total floorspace in region of 1,200-1,500 sqm GFA - Consideration to be given to other uses including public house/bar and community uses. Phasing – initial commercial space (300-400sqm GFA) after 450th house and convenience format store by completion of site R3.

| Mosstodloch South | Small scale commercial/retail space encouraged. | |

Summary of Stakeholder Engagement

- Elgin BID – no response received.
- Moray Chamber of Commerce – no response received.
- Highlands and Islands Enterprise – no response received.
- Developers and landowners associated with masterplan areas (Springfield, Robertsons, Barratt and landowners at Findrassie) – no response received.

Summary of Implications for the Proposed Plan

- Consider recommendations of the Moray Retail Study to update the network of centres. This will include considering identifying additional groups of shops and services not identified in the study that serve daily needs of neighbourhood.
- Review town centre boundaries.
- Consider potential new uses for the St Giles Shopping Centre in Elgin.
- Consider if local position is required to be prevent increase in the number of and clusters of takeaways forming.
- Consider restricting further drive through development where build up has been identified e.g. A96 east of Elgin.
- Given the extent of permitted development rights and the ability to move more easily between uses, the continued need for Core Retail Areas requires to be reviewed. Whilst the Core Retail Area could no longer be used to restrict Class 4 Business there is potentially merit in continuing to identify these to support certain community and leisure uses as part of encouraging a greater and more viable mix of uses across town centres but restricting other uses (including residential) on ground floors. However, as the town centres across Moray are very diverse the extent of Core Retail Areas and how important they are in individual towns will be considered.
- Reflect plans and strategies that aim to support the regeneration of our town centres in the new LDP. This will include considering the projects within ECCMP and TCIPs but also potentially reflecting any projects that emerge from the Town Centre Taskforce or Town Plan.
- Consideration to be given to whether qualitative deficiency for small supermarket/large convenience format is to be addressed.
- Consider recommendations in respect of retail provision with new neighbourhoods and reflecting these within the Proposed Plan.

Statements of Agreement

None identified.

Statements of Dispute

None identified.

Issue: Topic / Place	15. Rural Development
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, • Section 15(5) – the extent to which there are rural areas within the district in relation to where there has been a substantial decline in population.
Links to Evidence	**CD001** Moray Local Development Plan 2020 - Volume 1 **CD160** Moray Business Property Needs Study 2023 **CD028** Moray Local Development Plan Monitoring Report 2023 **CD033** Keith Green Energy and Infrastructure Framework – 2023 **CD034** Keith Green Energy and Infrastructure Framework – Appendix **CD035** Keith Green Energy and Infrastructure Framework – Appendix LSS **CD063** Moray Hydrogen Strategy 2022 **CD036** Moray Local Landscape Designation Review 2018 **CD026** Draft Moray Woodland and Forestry Strategy 2024

NPF 4 Context

National Planning Framework (NPF) 4 Policy 29 Rural Development is intended to provide a policy framework to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

Summary of Evidence

Moray is a region with outstanding natural resources and world-renowned brands. It is home to premier food and drink brands providing high end products through internationally recognised companies. The rural economy is diverse with different sectors ranging from fishing and agriculture to forestry, distilling and tourism.

Spatial overview of existing patterns of development and pressures across Moray

There are clear spatial patterns of development related to Moray's indigenous industries and their locational needs alongside emerging needs from sectors including energy, net zero and renewables. Accommodating demand for these uses has led to development pressures in rural areas and on the periphery of Moray's towns as set out below. These patterns of development and pressures alongside environmental assets have been spatially represented based on Local Housing Market Areas (LHMA). The LHMA are well aligned, and representative of the regions rural economy having been based around the main towns operating as service centres for the wider area.

Graphic X provides a Moray wide spatial overview of each LHMA, supporting the written detail on the characteristics of the specific rural areas below.

It is intended this approach will be further developed to provide a spatial framework to guide development in Moray's rural areas based on local knowledge and demand/pressures identified through monitoring reports and therefore more reflective of local circumstances. The Urban Rural Classification 2020 set out in NPF 4 Policy 29 Rural Development. is considered to conflict with the identified development pressures for large scale industrial uses occurring in Speyside for example. Under the urban rural classification large areas of coastline would be classed as remote rural which opens them up for development. It is considered that the current stance to protect sensitive coastal areas from inappropriate development is still relevant. These areas do not represent fragile communities where the Council would be seeking to direct new development to. In addition to this the Urban Rural Classification

does not appear to consider environmental assets that will be embedded within the Council's framework for guiding development in rural areas.

See plan below – Environmental Assets and Development Pressures

Rural Development –
Environmental assets
and development pressures

Legend
- Moray Wildlife Sites
- SWT Reserves
- CAT
- Battlefields
- Historic Gardens/Designed Landscapes
- SAC
- RAMSAR
- SPA
- SSSI
- Special Landscape Area
- Prime Agricultural Land
- National Forest Inventory Scotland 2020
- Carbon And Peatland 2016 Class 1
- Carbon And Peatland 2016 Class 2
- Housing HNDA

Forres LHMA

Elgin LHMA

Buckie LHMA

Keith LHMA

Speyside LHMA

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Speyside LHMA

Economic characteristics of Speyside LHMA

Within Speyside the economy revolves predominantly around farming, forestry, food and drink and tourism. The Business Needs Study identifies by far the greatest concentration of employment in the manufacturing sector is in Speyside and Glenlivet. In 2021, total employment in the manufacture of food and beverages was 3,250 in Moray. Almost half of the jobs in the sector (1,600) were in Speyside and Glenlivet, which hosts the Glenlivet, Glenfiddich and MacCallan distilleries which are the largest single-malt producers by volume globally, as well as the Walkers Shortbread factory in Aberlour.

Existing Patterns of Development and Pressure

Speyside is currently experiencing significant development pressure. Several distillery expansions have been undertaken in recent years and many are upgrading sites, visitor experiences and considering facilities such as biomass and anaerobic digestion to meet their own carbon neutral targets. Rothes in particular is experiencing pressure for large scale development to support the distilling industry. Consent was recently granted for 60,000 sq. m of whisky maturation storage on the edge of the town. The lack of large industrial sites in Speyside and the ad hoc nature of the requirements from the whisky industry has meant the development will be constructed on an undesignated site. A large new maltings facility was also consented on the edge of Rothes to support the distilling industry with production closer to the customer base. This was located partially on a designated site which was not large enough or the right shape to accommodate the development.

There is high demand for employment land sites in locations where there are no designated sites or a lack of sites large enough to accommodate user needs. There is an identified shortfall of employment land in Speyside (see Schedule 13 Business and Industry) to meet identified requirements for the MLDP 2027. Given the concentration of whisky distilleries in Speyside there is likely to be a continuing and increasing demand in the area for whisky related proposals. The implications of this need to be fed into the MLDP2027 and to support this there needs to be further engagement with the whisky industry.
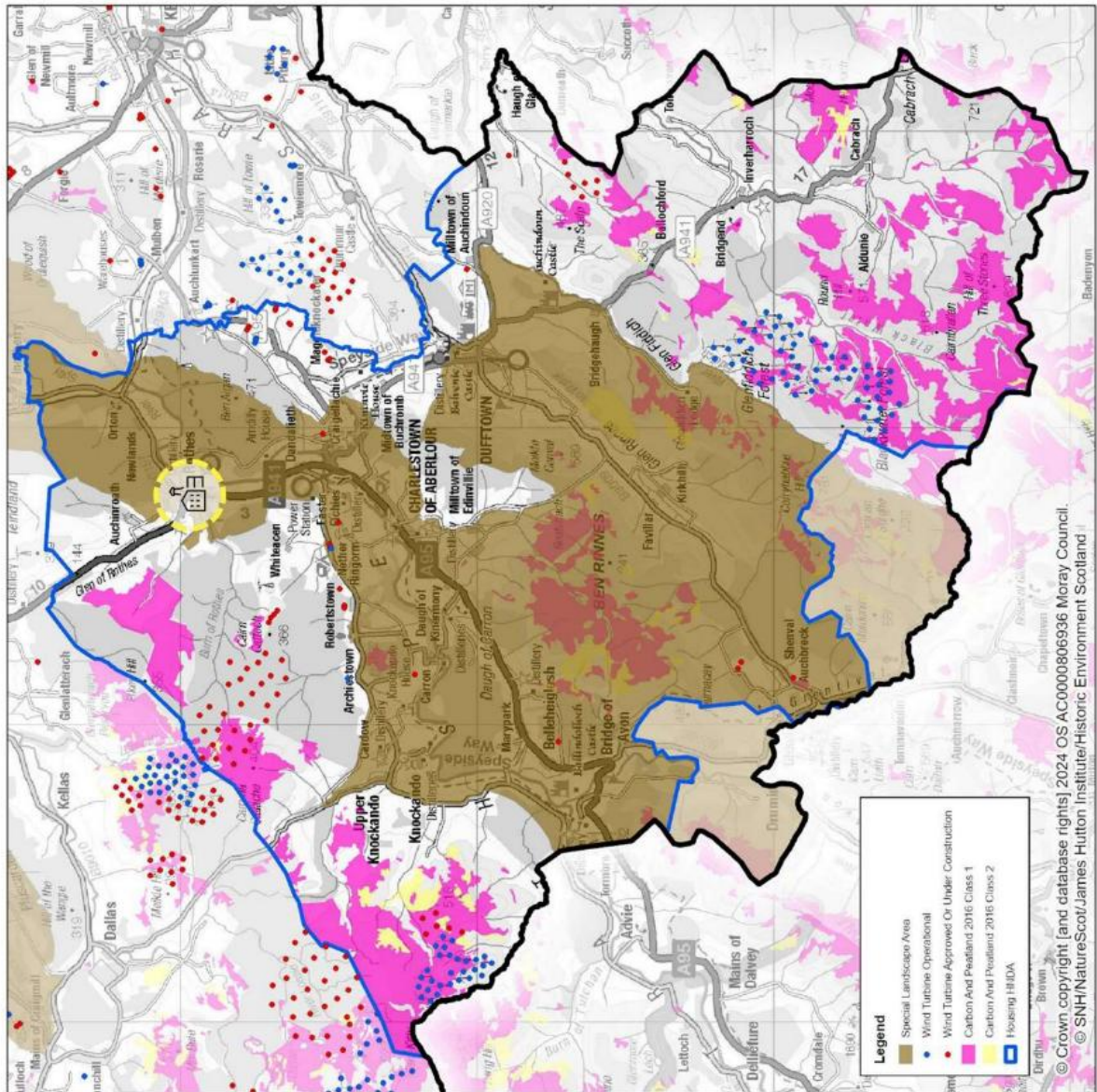
The Moray Council Hydrogen Strategy identifies Aberlour as a pilot project for hydrogen generation due to the concentration of distilleries and major transport logistics companies in close proximity. A specific site is yet to be identified; however, the development of the hydrogen economy will see requirements for land for hydrogen generation, hydrogen storage, refuelling stations within Speyside and across the wider Moray area. Other industrial user sites have been identified as having potential to be hydrogen sites including onshore wind installations located within rural Moray many within Speyside. As the strategy evolves the short-, medium- and long-term projects will be developed, and land requirements will become clearer and will inform the MLDP 2027.

Over the last 20 years there has been pressure for onshore wind energy across Moray. Schedule 5 Energy provides further detail and identifies two areas within Speyside where significant cumulative impacts have/are emerging at Dallas/ Knockando Moor and Cabrach which have resulted in significant adverse landscape and visual impacts.

Rural Development – Environmental assets and development pressures

Speyside LHMA

- Landscape and visual impact and impact on deep peat associated with onshore wind

- Landscape and visual impact associated with large scale warehousing, maltings and bioenergy centres to support whisky distilling

- Impact of tourism proposals on the Spey Valley Special Landscape Area (SLA)

Legend

- Special Landscape Area
- Wind Turbine Operational
- Wind Turbine Approved Or Under Construction
- Carbon And Peatland 2016 Class 1
- Carbon And Peatland 2016 Class 2
- Housing HMA

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Buckie LHMA

Economic characteristics of Buckie LHMA

Traditionally, in Buckie and the surrounding coastal villages the principal indigenous industries have been fishing, marine industries and farming. A decline in the fishing industry has seen a shift towards employment offshore. More recently the local economy has benefitted from the emergence of offshore wind and the opportunities associated with Buckie Harbour becoming an operations and maintenance base.

Existing development patterns and pressures

In terms of offshore wind demand is likely to be heavily concentrated around Buckie with the harbour an important location for operations and maintenance activity. There may be spin off supply chain opportunities and these must be directed to the existing employment land designations at March Road Industrial Estate. At this time there is no indication that there will be any significant pressure for rural development because of offshore wind.

The 2023 Monitoring Report does however highlight, in rural area surrounding Buckie there have been recent proposals for anaerobic digesters. At the time of writing these have still to be determined but the proposals are not located on designated employment land sites. Due to their nature these proposals are often located in rural areas and can be of significant size and massing. While these applications cannot be prejudged, these types of applications could have significant impact on the landscape and supply of designated employment land serving the Buckie LHMA. There have also been pressures for supporting infrastructure for the distilling industry including warehousing and anaerobic digestion. This may indicate an emerging trend that could also influence the approach to requirements for locational justification for new development.

Although it is not presenting as a significant issue currently, there may be pressure from renewable energy for example solar arrays and tourism related proposals for along the Moray coast. The Buckie LHMA includes the Portgordon to Cullen Coast Special Landscape Area (SLA). Schedule 16 Productive Places provides more detail and references developing a tailored approach to tourism opportunities within rural areas. There is ongoing work to identify any pressures relating to other types of tourism related development such as short term lets that will inform the MLDP 2027. See Schedule 8a Housing for further information.

Rural Development – Environmental assets and development pressures

Buckie LHMA

- Pressure on Buckie Countryside Around Town (CAT) designation from renewable energy infrastructure such as anaerobic digestion
- Tourism proposals and impact on coastal Special Landscape Areas (SLA's)
- Landscape and vicual impact assiclated with large scale maltings, warehousing and anerobic digestion to support whisky industry
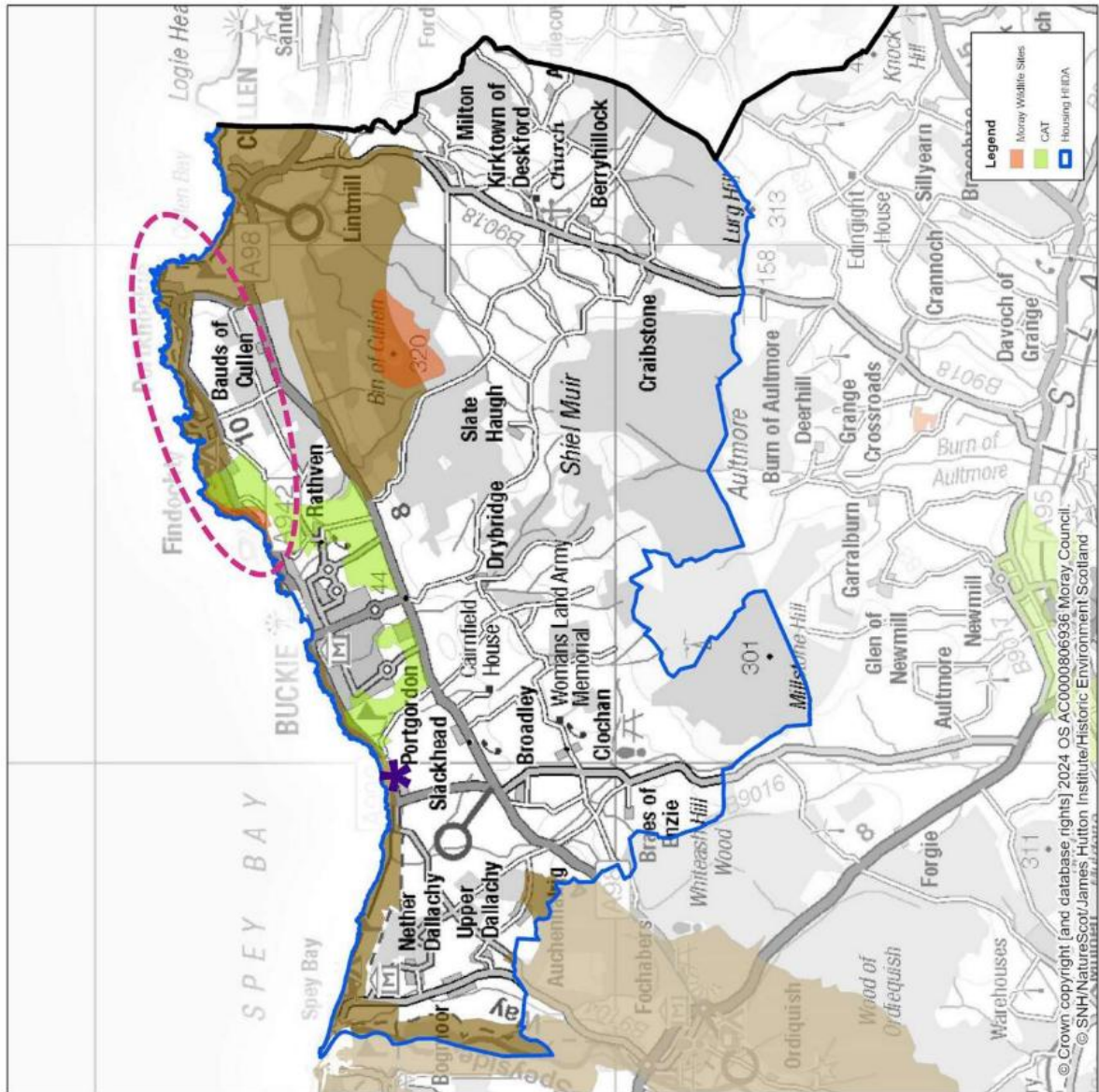
Keith LHMA

Economic Characteristics of Keith LHMA

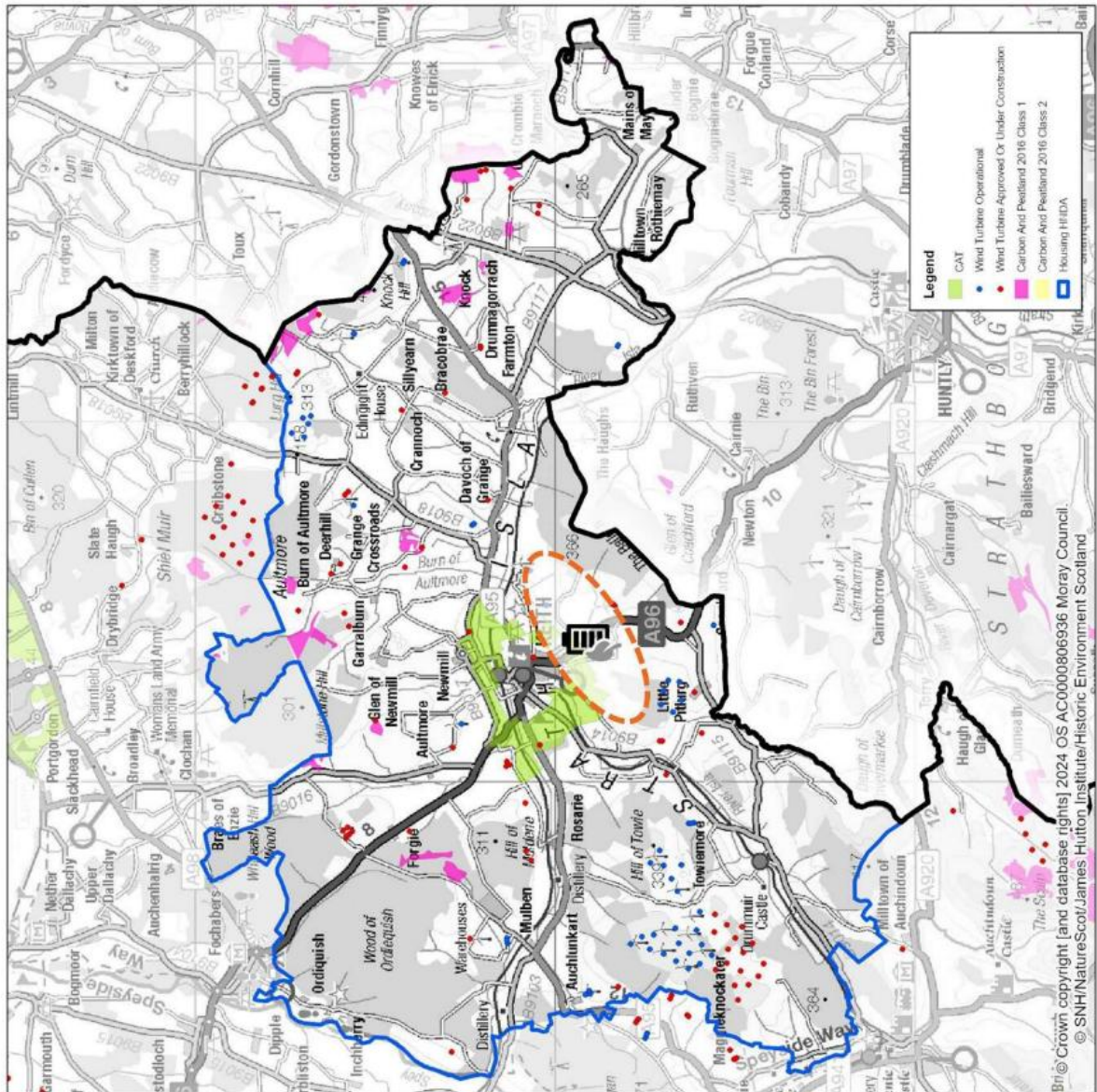Keith's traditional rural industries include farming and distilling and formerly textiles.

Existing pattern of development and pressures

The Keith and Blackhillock areas are coming under increasing development pressure, on a piecemeal basis, from development that supports the National Grid and there is no forward planning to identify this infrastructure. There have been a number of consents for Battery Energy Storage Systems (BESS) on non-designated sites outwith the Keith settlement boundary. In recognition of the pressure in this area, the Council commissioned the Moray – Keith Green Energy and Infrastructure Framework 2023. The framework has been developed to make best use of surrounding land and appropriately control the opportunities. Based on a landscape sensitivity assessment, the framework identifies potential development sites for a range of uses and associated landscape mitigation required. This work will feed directly into the MLDP 2027.

Rural Development –
Environmental assets and
development pressures

Keith LHMA

- Impact on employment land supply and Keith Countryside Around Towns (CAT) designation from battery energy storage solutions (BESS)
- Landscape and visual impact and impact on deep peat associated with onshore wind

Legend

- CAT
- Wind Turbine Operational
- Wind Turbine Approved Or Under Construction
- Carbon And Peatland 2016 Class 1
- Carbon And Peatland 2016 Class 2
- Housing HNDA

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Elgin LHMA

Economic Characteristics of Elgin LHMA

Elgin is the administrative and commercial centre for Moray providing services to the surrounding areas. Within its rural area indigenous industries are predominantly made up of farming, forestry and fishing in the coastal villages. Food and drink are important sectors with several distilleries operating within a few miles of Elgin.

Existing development patterns and pressures

As set out in the Monitoring Report 2023, outwith Keith there has also been interest for Battery Energy Storage Systems (BESS) on designated employment land sites. This includes an application for a BESS in Elgin. This trend has potential implications for the MLDP 2027 as these facilities do not fall within the use classes normally associated with industrial estates (use class 4 business, use class 5 general industrial, and class 6 storage or distribution) This type of application could have an impact on the Countryside Around Towns (CAT) designations covering Moray's 5 main towns (see Environmental Assets section below), the supply of designated land serving the Elgin LHMA and create pressure for development on undesignated land.
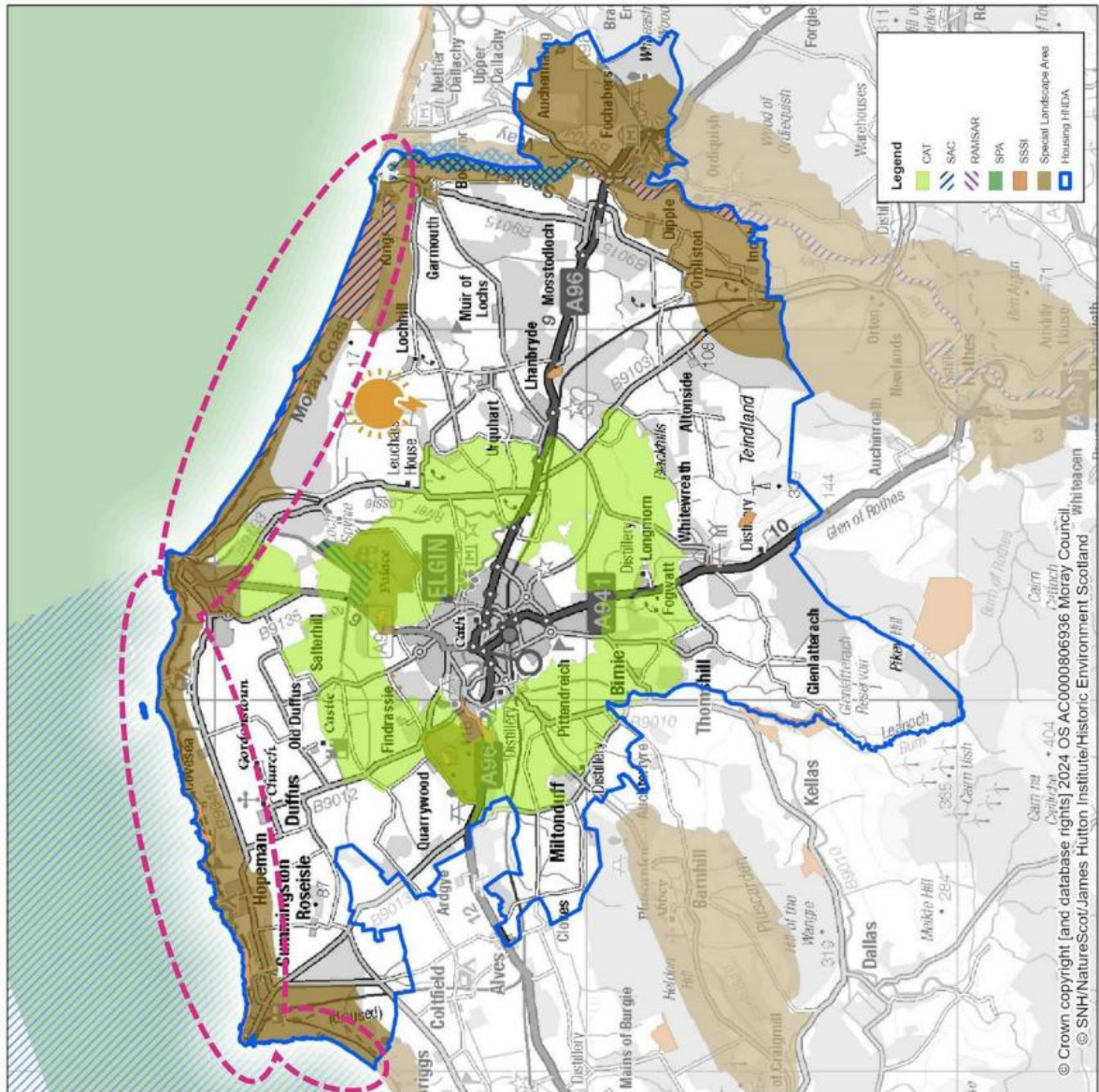
The Elgin LHMA includes the Coastal SLA from Burghead to Lossiemouth Coast and part of Lossiemouth to Portgordon coast. Although it is not presenting as a significant issue currently, there may be pressure for tourism related proposals for example along the Moray coast and its woodlands. Schedule 16 Productive Places provides more detail and references developing a tailored approach to tourism opportunities within rural areas.

There have been some development pressures for large scale industrial uses presenting themselves including anaerobic digestion and expansion of existing large employers on undesignated sites. Demand for employment land in general is being met by existing designated employment land sites predominantly located within Elgin. Engagement with the various industries is needed to plan for future investment and expansion to inform the MLDP 2027.

Rural Development – Environmental assets and development pressures

Elgin LHMA

- Impact on employment land supply resulting from renewable energy infrastructure such as battery energy storage solutions (BESS)
- Pressure on Elgin Countryside Around Town (CAT) designation from renewable energy infrastructure such as anaerobic digestion
- Expansion of existing large scale employers onto undesignated sites
- Solar arrays
- Tourism proposals impacting on fragile habitats such as coastal woodland

Legend: CAT, SAC, RAMSAR, SPA, SSSI, Special Landscape Area, Housing HHEDA

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Forres LHMA

Economic characteristics of the Forres LHMA

Forres is a market town providing services to the wider area. In the rural parts of the area the indigenous industries are predominantly made up of farming, forestry and distilling with several distilleries near Forres.
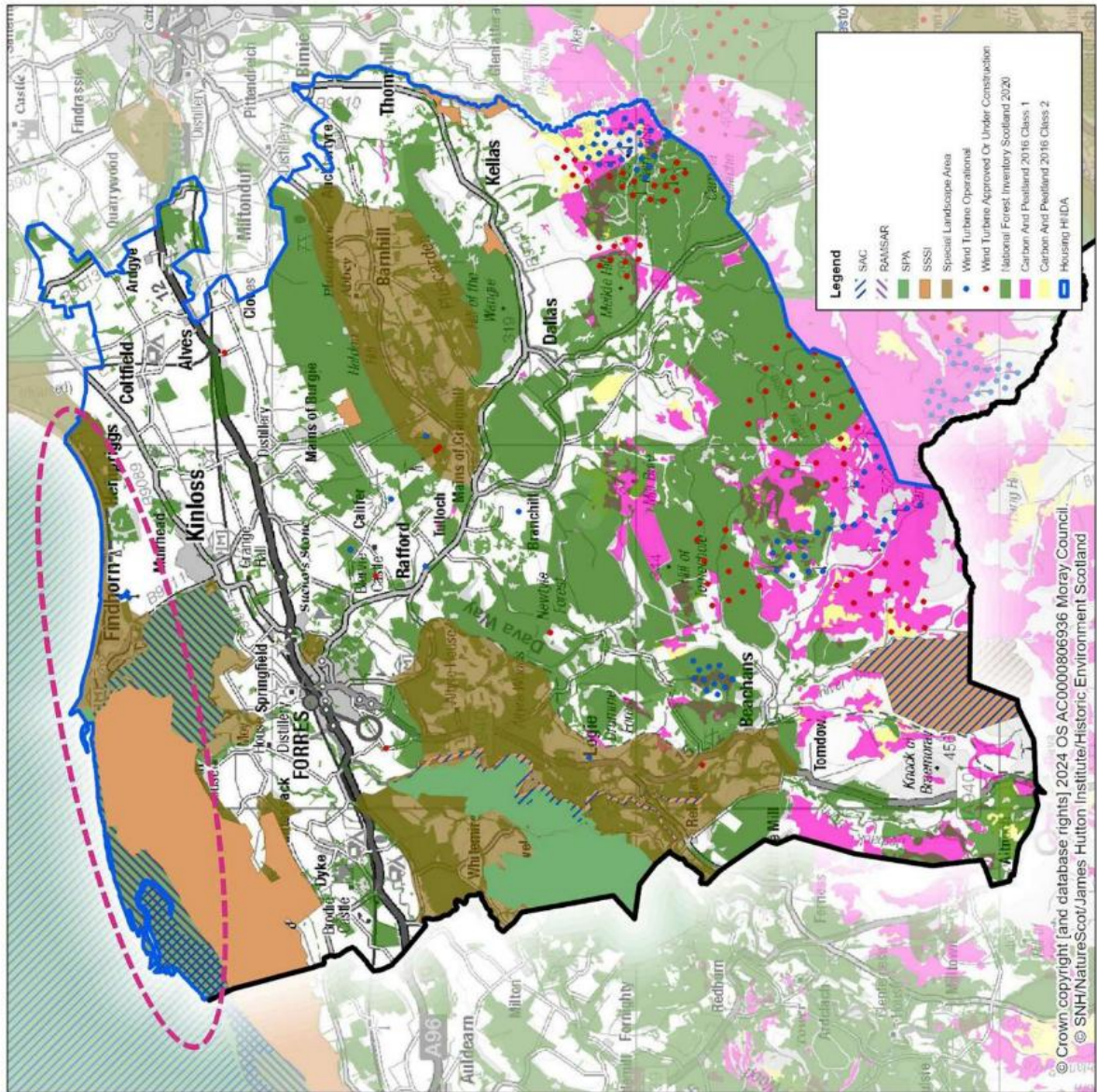
Existing pattern of development and pressures

Current demand for employment land is being met predominantly by the existing designated employment land site at the Enterprise Park Forres. The Forres LHMA also includes the Culbin to Burghead Coast SLA which will be sensitive to any development pressure from tourism proposals in the future and any increase in visitor numbers to fragile habitats for example Culbin Forest. There is also ongoing pressure on the rural landscape from onshore wind.

Rural Development – Environmental assets and development pressures

Forres LHMA

- Tourism proposals impacting on fragile habitats and coastal woodland
- Landscape and visual impact and impact on deep peat associated with onshore wind

Legend
- SAC
- RAMSAR
- SPA
- SSSI
- Special Landscape Area
- Wind Turbine Operational
- Wind Turbine Approved Or Under Construction
- National Forest Inventory Scotland 2020
- Carbon And Peatland 2016 Class 1
- Carbon And Peatland 2016 Class 2
- Housing HLIDA

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Environmental Assets

Alongside promoting sustainable economic development, it is important the high-quality environment and natural assets that Moray is renowned for are safeguarded.

Special Landscape Areas (SLAs)

Moray has 13 Special (SLAs) identified in the MLDP 2020, aimed at protecting and enhancing the special character and qualities of Moray's most valued landscapes. There are 5 SLA's that will have sensitivities to the types of development and pressures identified above.

The Spey Valley SLA has experienced pressure from development to support the whisky distilling industry and onshore wind. The Moray Local Landscape Designation Review Final Report 2018 sets out the reasons for the Spey Valley SLA designation that include the diverse and handsome landscape of broad gently weaving river, floodplain farmland, wooded valley sides and distinctive settlements together with the romance associated with the Spey due to its connection with whisky distilling. The whisky industry whilst contributing to the landscape character of the area can also have an impact on its scenic qualities. The Moray Local Landscape Designation Review identified that large buildings, usually associated with the whisky industry, can impact on views and the character of the Spey Valley and conflict with the perception of the strongly rural qualities of this landscape.

The Moray coast is covered by 4 SLA's covering Culbin to Burghead Coast, Burghead to Lossie Coast, Lossie to Portgordon Coast and Portgordon to Cullen Coast. The Moray Local Landscape Designation Review identifies the Moray coast as being sensitive to quarry operations, tourism proposals with areas like Culbin also sensitive to increasing visitor numbers potentially affecting wildlife and fragile saltmarsh habitat. Although not strictly rural development this area would also be adversely affected by housing proposals.

Countryside Around Towns (CAT)

Countryside Around Towns's (CAT's) are designated in MLDP 2020 where there is highest development pressure and aim to prevent development sprawl into the countryside. The Council is currently undertaking a review and will assess the current CAT designations in Elgin, Forres, Keith, Buckie, and Lossiemouth. Details of the purpose of the review are set out in Schedule 2 Biodiversity, Natural Places, Green and Blue Infrastructure. The main outcome of the review is to provide an up-to-date assessment of the current CAT designation to ensure it continues to deliver a balance between development needs and the protection of the area around pressurised settlements. The review will be informed by the development pressures identified within this schedule in particular proposals for battery storage and AD plants.

Soils

Moray has a number of areas of prime agricultural land, peatland and carbon rich soils that need to be protected from inappropriate development.

Draft Moray Woodland and Forestry Strategy 2024

The Council is preparing an updated Woodland and Forestry Strategy. The majority of Moray's woodland and forests accommodate tracks and paths for cycling, walking, horse riding and are used to host regional, national and international events such as orienteering. Long distance trails run through the woodlands and forests including the Dava Way, Moray Coast Trail and Speyside. The strategy will consider the impact of pressures from tourism and commercial forestry and will inform the MLDP 2027.

Protecting Moray's Environmental Assets

Recommendations within the Moray Local Landscape Designation Review Final Report 2018 were embedded into the MLDP 2020. Policy EP3 Special Landscape Areas and Landscape Character requires

careful siting and the highest quality of design alongside a clear locational need and demonstration that there are no alternative sites. The nature and level of the demand for large industrial users in rural areas supports a continued need to require locational justification and evidence of no other suitable sites for new development within SLA's to protect their special qualities. This needs to be considered in tandem with the identification of rural employment land sites in the least environmentally sensitive areas.

Identification of rural investment sites

The demand and pressures identified above justifies exploring options for the identification of rural employment land sites across Moray to accommodate inward investment. This would require further engagement with the energy and renewables sectors alongside indigenous industries.   Some engagement has already been undertaken as part of the Business Property Needs Survey.   Given constraints in terms of infrastructure and topography, site identification could prove to be difficult, especially in Speyside.   In terms of SLA's the 2023 Monitoring Report evidences the pressure from indigenous industries ranging from proposals for timber stacking and workshops, agricultural buildings to large scale bonded warehouses and maltings. This emphasises the need to identify rural employment land sites to direct large scale development proposals to least environmentally sensitive locations where no robust locational justification has been provided.

Community priorities

Extensive engagement was undertaken with the community at Evidence Report stage.   Identified community priorities related to the rural economy included the economic opportunities associated with tourism, specifically investing in green tourism and the potential for Moray to be a leader in this area. There was support for a Moray Coastal Natural Heritage Park and the associated benefits to wellbeing, tourism and the economy. Moray was viewed as an ideal location for remote workers, and this could be supported further by investing in broadband and co-working spaces closer to where people live. The economic, environmental and social benefits associated with investing in community energy schemes were highlighted as an opportunity, alongside the wider distribution of windfarm community benefits across Moray to share the economic benefit.

Currently, 8 community groups from across Moray are committed to preparing a draft Local Place Plan in 2024 which will in turn influence the next LDP.

Population in rural areas with substantial decline in population

In terms of understanding population change over time in rural areas, release of the 2022 census data is awaited and when published analysis will be undertaken to see how rural populations have changed over time. Where relevant this data will feed into the framework for guiding rural development.

Conclusion

All the ongoing work and studies identified above will be used to inform the tailored approach to rural development. The approach devised will take account of the characteristics of the areas rural economy and its indigenous industries and be informed by an understanding of the demand and pressures across Moray. As part of this the Council will create a spatial framework for guiding rural development that will be more reflective of local circumstances than the Urban Rural Classification 2020. To protect the area's identified environmental assets, development needs to be directed to the least environmentally sensitive locations and must be supported by robust evidence of locational need.   At present large-scale expansions of indigenous industries and development of land to support emerging technologies is happening on an ad hoc basis. There is a need to continue to engage with the energy and renewables industry and local indigenous industries to have a better understanding of potential future investment that will better inform options for the identification of large rural investment sites. It is accepted that there will inevitably still be ad hoc requirements for land.

Summary of Stakeholder Engagement

Copies of this schedule were sent to:
   • Highlands and Islands Enterprise (HIE) – See statement of agreement below
   • Scotch Whisky Association
   • Crofting Commission

Summary of Implications for the Proposed Plan
• Prepare a tailored approach to rural development in Moray recognising the existing patterns of development, identified demand, pressures and need to protect environmental assets. • Further develop the approach to spatially representing identified development patterns, pressures and environmental assets across rural Moray to create a framework for guiding development in Moray's rural areas. • Tailored approach must recognise Moray's primary indigenous industries and their needs including developing a definition of Moray's indigenous industries. • Work closely with Moray's indigenous industries to identify long term needs and liaise with energy sectors to better understand long term investment plans. • Explore the identification of rural investment sites in areas of Moray that have been identified as experiencing pressure to release undesignated land for development. • Consider the type of information that constitutes robust evidence of locational need. • Analyse 2022 Census rural populations data and identify any impacts on spatial approach to rural development.

Statements of Agreement
Highlands and Islands Enterprise Agree with sensitivities in relation to impact of tourism on rural and coastal areas, however, it should also be recognised that tourism is a significant income generator for small business and community organisations. This may be covered in Schedule 16. Stakeholder Engagement: Any current discussions with Energy developers should also be taken into consideration aligned with opportunities to maximise economic and social benefits for supply chain and community organisations. The issues raised are noted by these are addressed in Schedule 16 Tourism and Schedule 5 Energy. On that basis no change to this schedule is proposed.

Statements of Dispute
None identified.

Issue: Topic / Place	16. Productive Places – Tourism
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, section 15(5)(a) 'the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district'. Section 15 (5)(b) the principal purposes for which land is used.
Links to Evidence	**CD160** Moray Business Property Needs Study 2023 **CD161** Moray Economic Strategy 2022 **CD162** Moray Growth Deal – Full Deal Document **CD165** Tourism in Moray – The Strategy for Tourism Development in Moray **CD166** Visit Moray Speyside Tourism Business Improvement District Business Plan **CD167** Annual Visitor Summary and Economic Impact Statistics (STEAM Report) 2022 **CD168** Visit Moray Speyside Business Barometer Quarter 3 2023 **CD169** Moray Routes: Bright Futures Strategic Infrastructure Plan **CD170** Committee Report 2nd September 2020 – Rural Tourism Infrastructure Fund and Coastal Communities Fund Proposal - Coast to Country **CD026** Draft Woodland and Forestry Strategy 2024

National Planning Framework 4 Context

NPF4 seeks to encourage and support sustainable tourism development that benefits local people, is consistent with net zero and nature commitments, and inspires people to visit Scotland. LDPs should support the recovery, growth and long-term resilience of the tourism sector. The spatial strategy should identify suitable locations which reflect opportunities for tourism development by taking full account of the needs of communities, visitors, the industry and the environment. Relevant national and local sector driven tourism strategies should also be taken into account.

Summary of Evidence

Context – Tourism Moray

Tourism is a major part of Moray's economy, with expenditure and activity of tourists supporting 2,329 jobs directly and providing an economic impact of over £148m in 2022. According to the Scottish Tourism Economic Activity Monitor (STEAM) in 2022, of the total 706,999 visitors to Moray in 2022 466,083 were made by visitors staying in Moray as part of a holiday or short break with the others day visitors. This equates to a total of 1.79 million visitor days. The value of tourism in activity was estimated to be £148m compared to £134m in 2019 (pre covid). On average, visitors staying in Moray stay 2.5 nights and spend £33 million on local accommodation. Between 2021 and 2022 staying visitor numbers increased by 27.5% and total day visitors increased by 56.38%. The average length of stay for all visitors staying in serviced accommodation is 1.9 days and for non-serviced accommodation this rises to 7.3 days, indicating a higher proportion of weekly rentals. Overnight visitors typically have a greater economic impact than day visitors, making a greater proportion of employment opportunities for the sector. Staying visitors are estimated to have an economic impact of £284 per visit compared to £62 for day visitors. In 2022, the day visitor market accounted for 10.1% of the value of tourism activity (£15m). Meanwhile, the staying visitor market accounted for the remaining 89.9% of economic value (£133m).

Moray has a rich history and stunning landscape which make it an attractive destination for visitors. With half of Scotland's malt whisky distilleries within Moray many of which offer distillery tours Speyside is a key destination for whisky enthusiasts. Vistors can also experience Moray's rich history and heritage by visiting pictish sites, historic castles (including Brodie, Auchindoun and Ballindalloch), following the "Real Macbeth" story and visiting Elgin Cathedral. Moray's diverse landscape, from mountains to coast, is an attraction in its own right but the landscape also provides opportunities for outdoor pursuits and wildlife watching. Moray is home to three long distance trails (the Speyside Way, Moray Coast Trail and Dava Way) with the Moray Way combining parts of these trails to provide a circular route that takes you on a circular route through Moray's diverse landscape.

Visit Moray Speyside Tourism Business Improvement District

Visit Moray Speyside work as a destination marketing organisation and are also a Tourism Business Improvement District (BID). They represent the interests of almost 400 tourism businesses across Moray. Following the ballot the BID company began in April 2020 with its purpose to deliver the objectives of the Moray Speyside Tourism BID Business Plan.

To ensure the Tourism BID proposals address issues facing tourism businesses a survey was carried out in November 2018 to January 2019. This identified the following priority areas and opportunities.

- Marketing of the visitor offer.
- Support for events and festivals.
- Collective tourism voice and advocacy
- Better visitor experience
- Extending the visitor season and improving the night-time economy
- Training, advice and support to help with digital and online opportunities.

The key areas of work set out in the business plan are set out below.

- Marketing Moray Speyside nationally and internationally – including marketing to the travel trade and consumers, establishing an engaging brand, representation at key UK and overseas expos, and familiarisation trips for travel trade, social media influencers and online leaders.
- Improving the visitor experience – including improving visitor information online and on the ground, development of a Moray Speyside App, supporting events and festivals that aim to extend the visitor season, and working with partners to grow the value of specialist tourism to attract conferences and seminars.
- Support for business – provide a strong unified voice for industry and lobby for improvement to infrastructure and visitor services including signage, transport links, and public toilet and waste disposal provision, creation of a Moray Speyside customer service standard and introduce local tourism networks to ensure every part of Moray benefits.

Moray Speyside BID will be creating the next five-year business plan to cover 2025-2030.

Local Visitor Levy

The Visitor Levy (Scotland) Bill (SP Bill 28) was introduced in the Scottish Parliament on 24 May 2023. If passed by the Scottish Parliament and following Royal Assent, the Visitor Levy (Scotland) Bill will give local authorities the power to apply a levy on stays in overnight accommodation based on a percentage of the accommodation cost, with the percentage rate to be set locally. Funding raised from a visitor levy will be required to be spent on the visitor economy, such as facilities or services substantially for or used by visitors. At a meeting of Moray Council on 27th September it was agreed to support in principle the concept of raising funds through a Local Visitor Levy.

Quarterly Visit Moray Speyside undertake a Business Barometer to obtain feedback from business on ongoing performance and confidence in the future. The Q3 2023 survey completed by 59 businesses included questions about the Visitor Levy which included a question if the tourism levy was introduced how the income generated should be spent. This provides an indication what the industry considers is needed to support tourism in Moray. The top 10 suggestions were.

1. Public toilets
2. Better transport
3. Roads
4. Cleanliness/tidiness
5. Visitor information services
6. Marketing and promotion
7. Waste disposal/recycling services.
8. Outdoor activities for visitors
9. Signage for/ additional EV charging
10. Direct support for tourism businesses.

Public Engagement

Public drop in exhibitions as part of early engagement on the new Local Development Plan were held across 8 towns from March 2023 to September 2023 with over 300 people attending. Tourism was a key theme within comments in particular around "green tourism" and making the most of Moray's natural assets. Support for a Moray Coastal Heritage Park was also expressed.

A number of comments were also submitted through the Call for Ideas on supporting the economy.
- Promoting longer tourism stays through better funding and promotion.
- More campsites and areas where campervans are welcome.

Rural Tourism Infrastructure Fund (RTIF)

In March 2022, Moray Council were awarded a grant of £31,500 from Visit Scotland's Rural Tourism Infrastructure Fund (RTIF) to develop a Strategic Tourism Infrastructure Development Plans. A cross-section project team from Moray Council developed the Moray Routes Development Plan and identified enhancement of long distance active tourism infrastructure the priority for the plan. The plan aims to deliver long term benefits to the visitor experience, positively impacting the visitor economy and the local landscape. 'Moray Routes' comprise the network of key walking and cycling leisure routes across Moray and include:
- Moray Way
- Speyside Way
- Dava Way
- Moray Coastal Trail
- Rothes Way
- Isla Way

The Moray Routes: Bright Futures plan structured the prioritisation of future project applications based upon two separate Tiers. The two Tier-1 projects consisted of strategic Moray-wide proposals to enhance visitor experience through improved interpretation and digital infrastructure associated with the routes. The six Tier-2 projects were place based proposals aimed at improving path infrastructure along specific sections of the Moray Routes, where there was an identified need. Officers are now developing the prioritised projects with further applications submitted to the Rural Tourism Infrastructure Fund for funding to develop a route between Rothes and Craigellachie and also redevelopment of the Speyside Way at Spey Bay to Portgordon and onto Buckie.

The Coast to Country project was successful in securing Rural Tourism Infrastructure Funding in September 2021. The Coast to Country project is an integral part of a Moray wide strategic staycation programme. The project was delivered in partnership between the Council, Visit Moray Speyside, HIE, and various Community Trusts and Associations. The project aimed to create a network of facilities across the region that will contribute to tourism and relieve pressure on local beauty spots. By upgrading the infrastructure, the aim is to provide an improved visitor experience whilst reducing the negative impacts local communities have been experiencing, in particular from growth in the motorhome sector. The project was completed in October 2023 and provided:

- A new overnight motorhome facility in Cullen
- A new carpark with upgraded footpath to the iconic Bow Fiddle Rock in Portknockie
- Two upgraded toilet facilities in Findhorn and provision of a new toilet facility in Ballindalloch
- Carpark enhancements at Ben Rinnes, Fiddich Park in Craigellachie, and Ballindalloch
- Improved signage and pedestrian/vehicle counters at the aforementioned sites
- Electric vehicle charging infrastructure at Findhorn and Fiddich Park

Draft Woodland and Forestry Strategy 2024

The draft Moray Woodland and Forestry Strategy supports greater promotion of Moray's woodlands and forests for recreation and tourism including consideration of a Moray Forest Park designation in recognition of the importance of woodlands and forests to the region. The strategy states the Council work with partners including Visit Scotland, Visit Moray Speyside, Forestry and Land Scotland and landowners to identify ways of increasing visitors, addressing any improvements needed to wider visitor facilities, encourage greater investment in recreational facilities in forests and consider ways in which assistance can be given to encourage landowners to provide and maintain visitor facilities such as car parks and footpaths in woodlands.

Strategy for Tourism Development in Moray

Highland and Island's Enterprise's Strategy for Tourism Development in Moray was developed prior to covid and is in need of updating. The vision to 2025 for Moray in the Strategy is to "be known nationally and internationally as an exceptionally attractive destination for leisure and business visitors, offering memorable experiences, based on the area's unique assets, including malt whisky, the heritage of Macbeth, its pure natural environment and superb food using local food." The strategy objectives include doubling the economic value of tourism, doubling the size of the tourism related workforce with at least 80% working year round, living locally and fully skilled in their job and trained in customer care, and to achieve annual occupancy of service accommodation rooms of at least 75%; and at least 65% occupancy of self-catering units. Maintaining a high quality environment, visitor orientation, improving access to and within Moray, developing local supply chains, building on authentic experiences, serving the growing interest in nature based tourism, and substantially increasing bed space in Moray including for large groups attending conferences or attending large events are identified as opportunities to deliver the objectives.

Moray Economic Strategy 2022

Moray Community Planning Partnership updated the Moray Economic Strategy in 2022 taking into consideration the impacts on Moray from the Covid-19 pandemic, Brexit and the cost of living crisis. The overall vision is for Moray to be *"A distinctive and attractive place to live, work, operate a business or social enterprise, study and visit"*. The Strategy identifies adventure tourism as a growth opportunity given Moray's natural assets, the growth within this sub sector and the increasing awareness of the importance of visitor infrastructure and sustainable transport modes. The Strategy also notes that supporting town centres, an evening economy and more lifestyle opportunities will aid regeneration and attract more tourists to spend time and money there.

Moray Growth Deal

The Moray Growth Deal builds on the existing strengths of Moray's culture, tourism and manufacturing sectors, plus development of other sectors. It aims to address challenges to facilitate economic growth that is sustainable, fair and inclusive. The deal will see Investment of over £100 million across eight strategic projects. In Elgin the Cultural Quarter project has three key elements that aim to support inclusive economic growth and cultural expansion of the city and wider region. Refurbishment of Grant Lodge to create a high-quality heritage attraction is proposed. Refurbishment, extension and rebranding of Elgin town hall is proposed to create an improved cultural offering and support local creative industries. The final projects is a high quality hotel.

Moray Business Property Needs Study 2023

To inform the Moray Local Development Plan 2027 (MLDP 2027) a Business Property Needs study was commissioned to provide up to date information and analysis of current and future demand for business property in Moray. Sustainable tourism was identified as a sector with demand. The study noted with the number of businesses now exceeding pre pandemic levels this could lead to demand for class 4 business space, but demand was more likely with class 7 and 11.

Planned Engagement

Moray Council officer are planning to work with Visit Scotland and Visit Moray Speyside to engage with tourism businesses and explore potential tourism development opportunities. Opportunities identified would be considered for inclusion within the new plan.

Summary of Stakeholder Engagement
Visit Moray Speyside – statement of agreement below. **Visit Scotland** – no response received. **Highlands and Islands Enterprise** – no response received.

Summary of Implications for the Proposed Plan
- Future policy approaches should reflect the importance of the tourism industry to the Moray economy.   - The spatial strategy should identify suitable locations for tourism opportunities.   - Consideration to be given to if a tailored approach to tourism opportunities within rural areas.   - Work with Moray's tourism sector and Visit Scotland to identify long term needs and opportunities.   - Explore opportunities for Moray Forest Park

Statements of Agreement
Visit Moray Speyside noted their agreement with the evidence base.

Statements of Dispute
None identified.

Issue: Topic / Place	17. Culture & Creativity
Information required by the Act regarding the issue addressed in this section	- Town & Country Planning (Scotland) Act 1997, as amended, Section 15 (5) - The principal cultural, social and built heritage characteristics of the district; - The desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular, but not limited to, live music venues) in the district.
Links to Evidence	**CD161** Moray Economic Strategy - 2022 **CD165** Tourism in Moray – The Strategy for Tourism Development in Moray **CD171** Helen Avenell Heritage Associates & Moray: Arts Development Engagement – Cultural Sector Mapping Report July 2023 **CD172** Moray Cultural Sector Mapping database 2023 **CD088** Elgin City Centre Masterplan 2021 **CD089** Aberlour Town Centre Improvement Plan – 2022 **CD090** Buckie Town Centre Improvement Plan – 2022 **CD091** Dufftown Town Centre Improvement Plan – 2022 **CD092** Forres Town Centre Improvement Plan – 2022 **CD093** Keith Town Centre Improvement Plan – 2022 **CD094** Lossiemouth Town Centre Improvement Plan – 2022 **CD162** Moray Growth Deal Full Deal Document **CD163** Culture Radar 'Sustainable Future for Heritage and Culture in Moray' **CD173** Discover Moray's Great Places – Evaluation Report 2020 **CD174** Discover Moray's Great Places – Interpretation Plan and Action Plan April 2019

National Planning Framework 4 Context

NPF4 seeks to ensure that local distinctive places reflect the diversity of communities and support regeneration and town centre vibrancy, that cultural and creative industries are expanded, provide jobs and investment, and that communities have access to cultural and creative industries.

Summary of Evidence

Moray's Great Places & Town Centre Improvement Plans

Within Moray there are a wide variety of settlements all of which have their own unique history and identity. Many of these settlements continue to celebrate local cultural and historical events which are unique to their locality. NPF4 seeks to protect the traditions and community events and acknowledges that these can play a significant role in terms of supporting the regeneration and vitality of individual settlements but also the wider Moray economy.

A significant amount of work was previously undertaken under the Moray's Great Places project which sought to showcase and promote history, traditions, and cultural events across Moray. The work that has been undertaken as part of this project can be fed into the next LDP so that it can proactively support local communities, their economies, and their cultural heritage. Work from this project has already been fed into existing TCIP's and other town centre projects ensuring that there is a continuity in the "branding" across Moray, acknowledging the importance that cultural heritage has on the wider economy.

Town Centre Improvement Plans (TCIP's)

Moray Council approved a number of Town Centre Improvement Plans. The TCIP's set out a range of proposals to support the regeneration of the town centres which include bringing vacant and derelict buildings and sites back into use, improving active travel connections, heritage trails, greening and other streetscape improvements in order to create vibrant, attractive, green, health, safer and inclusive town centres. The TCIP's provide a framework for investment and attracting external funding whether projects are led by the Council, a community group, or a partnership of both.

Within these plans the there are several references to the role that heritage and culture can play in the regeneration of these settlements. As such projects relating to signage, heritage trails, public realm improvements, and public art projects were identified. Continuity to the branding will be achieved through work done on the Moray's Great Places Project which will improve the visitor experience across Moray. Work is currently ongoing in delivering a number of these projects and the TCIP's will feed into the next LDP.

Cultural Sector Mapping: Moray Report

As part of the work undertaken for the Cultural Quarter Project, the Council commissioned a report by Helen Avenell Heritage Associates (HAHA) and Moray: Arts Development Engagement (MADE). The purpose of this report was to understand and consolidate a picture of the cultural landscape in Moray. The report found that there is a wide-ranging art, heritage, and cultural offering across Moray that fell within those three sectors. However, given the fragmented and voluntary nature of these groups collating up to date evidence is challenging.

Cultural venues and groups range from more formal museums that fall in the heritage sector to the arts sector which relates to more third sector and community groups. However, the report highlights some key and similar conclusions that face the sector which is that there is a lack of funding to support groups as well as a lack of alignment and strategic thinking with arts and heritage assets to maximise economic growth and attract potential funding. Similarly, many of these organisations rely on volunteers which makes them vulnerable and naturally focussed on their own survival.

As part of this research attempts were made to create a database of all cultural venues and groups across Moray. However, it must be understood that due to the fragmentated and voluntary nature of the sector it would be impossible to have a full and detailed picture. The research collated data on cultural venues and groups which allows for these to be spatially mapped. The table below shows the number of heritage, arts, and cultural venues that were included in the database. **Please note as explained this is not a comprehensive list and other cultural groups may use other venues that have not been picked up on this database.**

Sector	Number of Venues	Comments
Heritage	32	• Elgin Museum is the only accredited museum in Moray however there is rich offering across Moray with huge potential as a visitor attraction.
Cultural	11	• Sector split into 4 sub sectors (3rd sector organisations, commercial business, community groups, sole traders). No evident connection between them and are driven by different purposes.

		• Report states that sector is arguably more developed than the heritage sector in driving economic growth. This includes Dance North, M:ADE, Moray Arts Centre, and Hunted Cow and North Port Studios from a commercial perspective.
Arts	4	• Key organisations include Elgin Town Hall for the Community, Moray Speyside, and the Village Hall Association.

The database also collated information on known Community Groups (understood to be primarily non funded and/or income generating). Of this the database has broken them down into the following sectors. **Please note, as above, this is not a comprehensive total as due to the nature of the sector it is extremely difficult to have a fixed list at any particular moment of time.**

- **Theatre** – 4
- **Music** – 16
- **Dance** – 9
- **Heritage** – 5

NPF4 requires local development plans to recognise and support opportunities for jobs and investment in the creative sector, culture, heritage, and the arts. The significant amount of work that has been undertaken as part of the wider Cultural Quarter project has provided an evidence base for beginning to understand what the cultural offering is like in Moray. The work that has been undertaken allows to be understood spatially which can feed into next MLDP to ensure it supports these industries. Having this spatial understanding of where venues and groups are operating could help to encourage strategic thinking about how these sectors operate as well as highlighting gaps in provision.

Forres Conservation and Heritage Scheme

Early work has begun on the Forres Conservation and Heritage scheme.   The project seeks to explore ways to develop, promote and conserve the historic character of the Forres conservation area to boost the local economy. The delivery phase is currently under way which will run until September 2024. If successful, the subsequent Delivery Phase will provide funding over a 5-year period which will not only bring physical improvements to the built heritage but also, improve the local economy by increasing visitors and footfall, promoting traditional skills, and providing more opportunities for social interaction and community cohesion. This work will feed into the next LDP as well as potentially providing the opportunity to align with delivering projects within the Forres Town Centre Improvement Plan (TCIP).

Local Place Plans and further engagement on the LDP 2027

Through further LDP engagement and LPP's community groups will be able to identify spaces and/or buildings which are used for cultural and creative purposes which perhaps are not readily known. For example, there may be cultural events that are specific to particular settlements or areas. This potentially would allow these gaps to be filled and could feed in the LDP process allowing these venues/spaces to be formally recognised and protected. Another call for ideas will likely be held which will allow the opportunity for sites/spaces to be considered as part of the next LDP.

Moray Economic Strategy 2022

Moray Community Planning Partnership updated the Moray Economic Strategy in 2022 taking into consideration the impacts on Moray from the Covid-19 pandemic, Brexit, the cost-of-living crisis, and the Climate Emergency. It is a 10-year strategy based around the vison of Moray being "A distinctive and attractive place to live, work, operate a business or social enterprise, study and visit" and contains high level actions to achieve this. The strategy acknowledges the importance of the MGD and the

Cultural Quarter Project to support cultural expansion and economic growth in Elgin and beyond. The strategy recognises the opportunity for social enterprises to benefit from development support through the Business Enterprise Hub, and through the increase in cultural activity from the Cultural Quarter.

Tourism in Moray – The Strategy for Tourism Development in Moray

Improving the cultural offering in Moray provides a significant opportunity to improve the wider attraction of Moray as a tourism destination. The Strategy for Tourism Development in Moray sets out a vision in 2025 for Moray to "be known nationally and internationally as an exceptionally attractive destination for leisure and business visitors, offering memorable experiences, based on the area's unique assets, including malt whisky, the heritage of Macbeth, its pure natural environment and superb food using local food." The strategy recognises the importance of locally led initiatives through community-based organisations and how these must be supported. The strategy acknowledges that forming alliances with neighbouring organisations (whether informal or formal) will allow the sharing of resources, joint promotions, as well as strengthening Moray's abilities to meet tourists needs. Evidence gathered through the LDP process regarding protecting and supporting cultural venues supports this wider strategy.

Elgin City Centre Masterplan & Moray Growth Deal

Cultural Quarter

The Elgin City Centre Masterplan (ECCM) was approved by Moray Council in January 2021. The Masterplan sets out a range of proposals including redevelopment opportunities, refurbishment of buildings, streetscape works, active travel connections, new facilities within Cooper Park and greening of the City Centre. Amongst the variety of projects identified within the ECCM were projects that would be funded by the Moray Growth Deal (MGD) which included the Cultural Quarter project.

The MGD is a significant package of investment of over £100 million for eight strategic projects and seeks to build on the existing strengths of Moray's culture, tourism, and manufacturing sectors. The aim of these projects is to boost the economic competitiveness of the region which in turn will help to boost economic growth.

The Cultural Quarter is focused on the refurbishment of Grant Lodge as a high-quality heritage attraction, the extension and rebranding of Elgin Town Hall to create space for creative industries to thrive as well as improving the cultural offering available, and finally providing a high quality hotel.

Summary of Stakeholder Engagement

Moray Council Senior Project Manager Cultural Quarter – Comments received have been included within the schedule.

Visit Moray Speyside

Moray Society – see statement of agreement below.

Summary of Implications for the Proposed Plan

- The new local development plan must consider the benefits that cultural events and attractions bring to Moray. This must be recognised as a key part of the wider tourism industry.
- Settlements statements to identify any known cultural venues/spaces and any which may be highlighted through the further LDP engagement.
- Work with local communities to identify long terms needs and requirements.

Statements of Agreement

Elgin Museum Volunteer and Trustee of the Moray Society

Notes the importance of Elgin Museum in terms of its contributions to Moray's Culture and Creativity and is the only accredited Museum in Moray. It was stated that the museum contributes to driving economic growth by providing within Moray and to an international audience through providing a key contribution to heritage and Moray's representation in the museum sector, in Scotland and beyond.

Moray Council agrees that the Elgin Museum is an important cultural and heritage asset particularly in terms of its location to Grant Lodge, the High Street, and the proposed Cultural Quarter. Its importance as being the only accredited Museum is acknowledged and referenced within the schedule as well as supporting documentation.

Statements of Dispute

None identified.

Issue: Topic / Place	**18. Minerals**
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, Section 15(5)(a) 'the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district'
Links to Evidence	**CD175** Collation of the results of the 2019 Aggregate Minerals Survey for Scotland (Sept 2023) **CD045** Moray Planning Policy Guidance - MLDP

National Planning Framework 4 (NPF4) Context

The intention of the policy is to support the sustainable management of resources and minimise the impacts of the extraction of minerals on communities and the environment. Local Development Plans are required to provide at least a 10-year landbank of construction aggregates in relevant market areas.

Summary of Evidence

2019 Aggregate Minerals Survey for Scotland and Moray Minerals Audit 2023

Moray forms part of the North East Scotland region for the purposes of the Scottish Aggregates Survey. In 2019, it was estimated that 482,000 tonnes of sand and gravel were extracted across the region. Of this, 396,000 tonnes were retained within the region. In Moray, there is a permitted minerals reserve of sand and gravel to September 2033. An application is currently under consideration for an extension of operating time for Fairyhills Quarry until 2034. However, consented supply levels drop considerably by 2031. Given the predicted drop in supply levels and permitted reserves expiring in 2033, there is scope for applications for new extraction or extensions to be in place to maintain healthy supplies.

In respect of crushed (hard) rock, there are consents for extraction in place in Moray until 2064. Taking into account the 2019 Aggregates Survey, where 1.1 million tonnes of crushed rock was produced in the North East Scotland region and 19,000 tonnes imported, Moray's contribution is less than that of sand and gravel; however, based on the development rates and large scale development in this relatively small rural authority within the wider region, it is considered that this is sufficient to meet local demand and there is a landbank available in excess of 41 years.

Moray Planning Policy Guidance – MLDP

To aide delivery or interpretation of MLDP policies in the local context, planning policy guidance was developed to guide developers and officers. Guidance on the restoration and aftercare of excavated mineral sites set out best practice to restoration design to ensure that these were designed and implemented to the highest standard, resulting in improvements to the cultural, recreational or environmental assets of the area.

Summary of Stakeholder Engagement

The Moray Minerals Audit 2023 included engagement with operators of quarries within the Moray Council administrative boundary. 7 of the 9 local operators provided commercially sensitive information to inform the Audit.

British Aggregates Association – No response received.

Summary of Implications for the Proposed Plan

- Proposed Plan to identify and safeguard the locations of important workable mineral resources which are of economic or conservation value.
- As an Insufficient landbank of permitted mineral reserves exists for sand and gravel, dialogue is ongoing with local operators to identify opportunities to increase consented reserves and secure a sufficient landbank beyond 2033.

Statements of Agreement / Dispute

None identified – no response received from stakeholder.

8. Site Checklists

The Council intends to use assessment checklists as part of its site appraisal process. The site assessment checklist circulated by the Improvement Service (IS) will be customised to reflect the evidence required to prepare the new LDP. This will include adding further detail on transport and human health. For example, criteria will be added to identify whether proposals are within the safeguarding distances of MOD bases and facilities. In addition to be being completed by officers the site assessment will be circulated to statutory and technical consultees to add knowledge from their respective remits. Once all the information is gathered and collated including the scoring for SEA, it will allow officers to make a determination on the suitability of the site for inclusion in the new LDP.

Sites that may be deemed suitable for inclusion in the new LDP will be subject to further assessment to ensure that they are deliverable and effective. Landowners and developers will be required to complete the Effectiveness and Delivery Checklist and where this information is not forthcoming, sites will not be allocated.

It should be noted that changes may be made to the checklists in the future to ensure that they are fit for purpose and cover all pertinent issues.

LOCAL DEVELOPMENT PLAN: SITE ASSESSMENT AND SEA CHECKLIST

Site Name:	Source of site suggestion: All landowners/interested parties identified/aware?	Current site reference	Site History/Previous planning applications, existing local plan policies and proposals, historic reference numbers:
Settlement:	GIS Site Ref: Previous ref:	Outside settlement boundary?	
OS Grid Ref:	Site Size (ha):	Is the site an allocation in the adopted LDP; sites proposed through call for ideas or any other sites with potential? No Yes ref. Yes but different boundary	Summary Description (topography, features, boundaries, neighbouring issues, access, exposure, aspect etc. Site visit/GIS observations:
Current Use e.g. is the site brownfield, vacant and derelict land, greenfield, agricultural?	Proposed Use:	Relevant policies/proposals from LDP or NPF4:	

Insert Location Plan:	Insert Photographs if available:

Topic – water Related SEA topics – population and human health, material assets, climatic factors	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
Could the proposal affect the condition of the water environment (water quality, physical condition, water resources, and the migration of wild fish)? See RBMPs for further detail on water condition.	Flood risk and water management Coastal development Blue and green infrastructure					
Could the proposal have a direct impact on the water environment (for example, result in the need for watercourse crossings or a large-scale abstraction or allow the de-culverting of a watercourse?	Flood risk and water management Coastal development Blue and green infrastructure					
Can the proposal connect to the public foul sewer?	Infrastructure first					
Can the proposal connect to the public water mains? If not, is there a sustainable water source that is resilient to the periods of water scarcity?	Flood risk and water management Infrastructure first					
Are there wetlands or boggy areas on the site?	Flood risk and water management					

For large scale developments, are there any private or public water supplies within 250m of the site which may be affected?	Infrastructure first					
Flood Risk Relative to the floodplain, as defined in NPF4 could the proposal be at risk of flooding (from any source) or result in additional flood risk elsewhere? If flood risk is not fully understood, a Flood Risk Assessment (FRA) should be undertaken. Specify which of the following flood sources are applicable: fluvial, pluvial, sewer, groundwater or coastal.	Flood Risk and Water Management Coastal development					
Could the development of the site help alleviate any existing flooding problems in the area?	Flood risk and Water management					

Topic – Biodiversity, Flora and Fauna Related SEA topics – soils, water, climatic factors…	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
To what extent will the proposal conserve, restore and enhance biodiversity?	Biodiversity Natural Places					
To what extent will the proposal facilitate the creation of nature networks and improve ecological connectivity?	Natural places Biodiversity					
International Designations - SAC/SPA, Ramsar, World Heritage Sites. To what extent will the proposal affect these sites including via connectivity?	Natural places Biodiversity					
National Designations To what extent will the proposal affect national designations – e.g. SSSI, NNR	Natural places biodiversity					
To what extent will the proposal affect other designations - and locally important designations such as LNRs.	Natural places Biodiversity					
To what extent will the proposal affect Non designated – e.g. trees, TPOs, hedges, woodland, (including woodlands in the Ancient , Semi Natural and Long Established Plantation Woodlands), species rich grasslands	Natural places Biodiversity					

Protected Species–e.g. bats, otters, etc - can it be ascertained if protected species will be affected and will a site survey be required?	Natural places Biodiversity					
To what extent will local geodiversity sites or wider geodiversity interests that could be affected by the proposal?	Soils Natural place Biodiversity					
How will habitat connectivity or wildlife corridors be affected by the proposal – will it result in habitat fragmentation or greater connectivity?	Biodiversity Tackling the climate and nature crisis Forestry, trees and woodland.					

Topic – Climatic Factors Related SEA topics – population, human health, water, biodiversity, material assets, soils, air, cultural heritage, landscape	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
To what extent will the proposal involve sediment extraction/reclamation or changes in coastal processes that could result in coastal flooding?	Climate mitigation and adaptation Coastal development					
To what extent will the proposal promote and enable adaptation to climate change?	Climate mitigation and adaptation					
To what extent does the proposal use nature based solutions for climate change mitigation and adaptation?	Climate mitigation and adaptation Infrastructure First Blue and Green infrastructure					
To what extent does the proposal maintain and enhance resilience of existing and planned grey and green infrastructure?	Climate mitigation and adaptation Infrastructure first Blue and Green infrastructure					
To what extent does the proposal have good proximity to services and good access to existing or proposed public transport and active travel network?	Climate mitigation and adaptation Infrastructure First.					

Topic – Air Quality Related SEA topics – climatic factors, soils, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
Could the proposal lead to Local Air Quality Management thresholds being breached in an existing Air Quality Management Area?	Climate mitigation and adaptation Health and Safety					
Could the proposal lead to the designation of a new Air Quality Management Area (AQMA)	Health and safety					
Does the proposal introduce a new potentially significant air emission to the area (e.g. combined heat and power, an industrial process, large scale quarry etc.)?	Health and safety					
Will the proposal lead to a sensitive use being located close to a site with noise/odour issues or a site regulated for emissions to air by SEPA (e.g. new housing adjacent to a large manufacturing factory)	Health and safety					

Topic – population and human health Related SEA topics – climatic factors, air, water, soils, material assets	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
Is the proposal within the vicinity of a major accident hazard site or major accident hazard pipeline?	Health and safety					
Will the proposal affect service infrastructure: Education capacity - Secondary School Catchment Area/ Primary school catchment area Health provision/GP capacity						
To what extent will the proposal affect the quality and quantity of open space and connectivity and accessibility to open space or result in a loss of open space?	Design, Quality and place local living and 20 min neighbourhoods Blue and green infrastructure Play, recreation and sport					
To what extent will the proposal affect core path links or other key access networks such as cycle paths, coastal paths and rights of way?	Sustainable Transport Design, quality and place Local living and 20 minute neighbourhoods Infrastructure first??					

Will the proposal have the opportunity to incorporate new or enhance existing blue and/or green infrastructure providing multiple benefits such as enhanced biodiversity, management of surface water?	Blue and Green infrastructure Infrastructure First					

Topic – Soils Related SEA topics – landscape, cultural heritage, water, biodiversity, flora and fauna, material assets.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
Does the proposal make use of a brownfield site or contaminated and vacant and derelict land? If on brownfield, is the site naturalised?	Soils Brownfield, vacant and derelict land					
Are there any contaminated soils issues on the site and if so, will the option employ remedial actions to ensure the site is suitable for use (as defined in PAN 33)?	Soils					
Is the proposal on peat or carbon rich soils and could the development of the site lead to a loss of peat or carbon rich soils?	Soils Climate mitigation and adaptation					
Does the proposal result in the loss of prime agricultural land or land that is culturally or locally important for primary use as identified by the LDP?	Soils					

Topic – Landscape Related SEA topics – climatic factors, air, water, soils, material assets, biodiversity, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
National landscape designated sites To what extent will any designated sites be affected – including NSAs, Regional Scenic Areas, and local landscape designations?	Natural Places					
Regional and local landscape designated sites To what extent will any designated sites be affected – Regional Scenic Areas, and local landscape designations?	Natural Places					
Non designated landscape features and key landscape interests Does the proposal ensure that development does not exceed the capacity of the landscape to accommodate it? Such as current settlement boundaries, existing townscape and character of surrounding area and its visual qualities?	Natural Places					
To what extent will the proposal affect features of landscape interest, including the distinctive character of the landscape	Natural places					

Topic – Landscape Related SEA topics – climatic factors, air, water, soils, material assets, biodiversity, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
National landscape designated sites To what extent will any designated sites be affected – including NSAs, Regional Scenic Areas, and local landscape designations?	Natural Places					
Regional and local landscape designated sites To what extent will any designated sites be affected – Regional Scenic Areas, and local landscape designations?	Natural Places					
Non designated landscape features and key landscape interests Does the proposal ensure that development does not exceed the capacity of the landscape to accommodate it? Such as current settlement boundaries, existing townscape and character of surrounding area and its visual qualities?	Natural Places					
and the qualities of wild land?						

Topic – Cultural Heritage Related SEA topics – Climatic factors, air, water, soils, material assets, biodiversity, landscape	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
Does the proposal protect or enhance the site or setting of: • World Heritage Sites* • Scheduled Monuments • Listed buildings • Inventory battlefields • Inventory gardens and designed landscapes • Conservation Areas • Undesignated historic environment assets • Streetscapes and settlement patterns monuments	Historic assets and places Natural Places					

Does the proposal promote or enable the retention, maintenance and sustainable use or re-use of historic buildings and infrastructure?	Historic assets and places Zero waste Infrastructure first Brownfield, vacant and derelict land and empty buildings City, town, local and commercial centres Rural development					

Does the proposal: Support the repair and appropriate retrofit of historic buildings? Support the transition to green energy supply in historic buildings? Include adaptation measures to make the historic environment assets and places more resilient to the effects of climate change (e.g. coastal erosion, flooding etc)?	Historic assets and places Tackling the climate and nature crises Climate mitigation and adaptation Design, quality and place Infrastructure first Quality homes Flood risk and water management Rural homes					

Does the proposal: Enable the historic environment to support creation of high-quality places and spaces? Promote sustainable, responsible tourism, recreation and cultural activity?	Tourism Culture and creativity Design, quality and place Play, recreation and sport Local Living and 20 minute neighbourhoods					

Topic – Material Assets – Deliverability/ sustainability constraints Related SEA topics – climatic factors, air, water, soils, population and human health.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/conclusions
Will the site be delivered within the LDP timeframe? Other site servicing constraints, e.g. electricity pylons, underground gas pipelines etc.						
Site aspect – does the site make best use of solar gain? Is the site protected from prevailing winds?	Design Quality and place Climate Mitigation and Adaptation Heat and Cooling					
Is the site in an area of heat network potential or a designated Heat Network Zone (HNZ)?	Climate Mitigation and adaptation Heat and cooling					
Vehicular Access constraints or opportunities - Is the network capable of accommodating active travel, public transport, other shared modes, and private vehicle traffic generated?	local living and 20 min neighbourhoods Sustainable transport					

Is the site close to a range of facilities? Can these be accessed by public transport or active travel?	local living and 20 min neighbourhoods Sustainable transport City, town, local and commercial centres					
Does the proposal minimise demand for primary resources by reusing an existing building?	Zero waste					
For waste infrastructure and facilities (except landfill and EFW) does the proposal comply with the criteria listed in NPF4 policy 12 d)?	Zero waste					

Other Considerations

Please note any other issues which may be relevant to the assessment of the candidate site. For example:

- Any restrictive covenants relating to the use of the land/ buildings contained within the proposed candidate site?
- Is the candidate site on Common Good Land?
- Is there a requirement to prepare place-based development briefs or masterplans?

Scoring – two columns have been added in the event that is it useful for planning authorities to quickly identify environmental effects from a proposal on a site. Where adverse effects have been identified, it may then also be useful to consider any obvious mitigation measures that might reduce these adverse effects. The second scoring column then allows at a quick glance to see what residual effects might remain following mitigation. There are many scoring techniques currently in use and an example of one option could be:

++	+	0	-	--
Significantly positive	positive	neutral	adverse	Significantly adverse

Explanation of the key SEA topics (please note the SEA objectives are suggested examples only)

Water
SEA objective – To protect and enhance the ecological status of the water environment

Water Drainage Constraints
The Water Framework Directive (2000/60/EC) has the overall objective of ensuring that all inland and coastal waters within defined river basin districts reach at least good status by 2027. Achieving this requires measures to be put in place and action to be taken to i) prevent deterioration and ii) promote improvements in the water environment.

Information on the current status of a water body, pressures affecting it, measures required to address those pressures, and deadlines for achieving those measures can be extracted from SEPA's water environment hub. This tool should be used to identify existing pressures on water bodies and the site assessment should identify whether or not policies and proposals are likely to exacerbate existing pressures, create new problems and offer opportunities for enhancement. For example, if there are already morphological pressures on a water body then further engineering could trigger a further downgrade. Control of non-native invasive bank-side / in-stream plant species is an example of enhancement where an invasive non-native species pressure has been identified for a water body.
Back to Table

Groundwater Dependent Terrestrial Ecosystems (GWDTEs)
GWDTEs are types of wetland which are specifically protected under the Water Framework Directive. SEPA holds a list of GWDTEs within all designated sites (SSSIs, SPAs, and SACs). To identify non-designated GWDTEs a habitat survey (Phase 1) would be required. At the site assessment stage we do not require a Phase 1 Habitat Survey, but we do require information on location of wetlands and boggy areas. This information can be collected by looking for the boggy ground symbol on GIS and / or a site visit.
Back to Table

Flood Risk
Development plan preparation should be informed by a Strategic Flood Risk Assessment (SFRA). Scottish Government's Development Planning Guidance states that SFRAs are designed to inform the development planning process, primarily to avoid increasing overall flood risk by avoiding areas of flood hazard. The SFRA can be used as a screening tool to identify whether flood risk is fully understood at site assessment stage, and therefore whether further detailed site-level Flood Risk Assessment is required prior to a site being included in the Proposed Plan, to ensure that only sites that are in accordance with NPF4 are allocated SEPA has produced Strategic Flood Risk Assessment Guidance which explains how this assessment can be carried out.

For SEA purposes if flood risk is found to be an issue, mitigation could be the removal of the site (or part thereof found to be at risk) from allocation.
Back to Table

SEA guidance on water provides advice on how to take water into account in SEA.

Biodiversity, Flora and Fauna

SEA objective – Protect and enhance designated wildlife sites, wider biodiversity interests, valuable habitats and protected species, avoiding irreversible losses

International Designations

If there is a likely significant effect then it is important to state why and what site may be affected (including Ramsar sites). The information gathered for this Site Assessment will help inform the 'screening' stage of the HRA – i.e. identify likely significant effects on a Natura site. **Policies or proposals likely to affect a Natura site should be flagged up for assessment in terms of the Habitats Regulations Appraisal.** Guidance on where designated sites are and what their qualifying interests relate to can be found on NatureScot's website Sitelink - https://sitelink.nature.scot/home. In addition, the majority of Natura sites are underpinned by Sites of Special Scientific Interest (SSSIs). SSSIs all have a site management statement which provides useful information on site condition and management pressures and will help to establish what is important and why and therefore help identify likely significant effects.

Back to Table

National designated sites

Again, see the above comments regarding site management statements for Site of Special Scientific Interest (SSSIs). National Nature Reserves (NNRs) are examples of the best wildlife sites in Scotland. These are managed for wildlife but also allowing for enjoyment by public. Guidance on NNRs can be found at: www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/national-designations/national-nature-reserves

Other Designated Sites

Local Nature Reserves (LNR) are locally important for natural heritage, designated and managed by local authorities to give people better opportunities to learn about and enjoy nature close to where they live. Similarly Local Nature Conservation Areas flag-up to planners and developers where there are natural feature of some merit. In this way it gives planners and developers early indication of sensitive sites and opportunities for enhancing the local environment. The local Biodiversity Officer should be able to provide advice here.

Non designated features and key wildlife habitats

- trees and woodland, including ancient and semi- natural inventory sites
- species rich grassland, moorland, heathland, wetlands and watercourses including burns

Links to Ancient Woodland Inventory (within SNHi) and the Forestry Commission's Native Woodland Survey of Scotland are detailed below.

www.nature.scot/doc/guide-understanding-scottish-ancient-woodland-inventory-awi

http://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/native-woodland-survey-of-scotland-nwss

Back to Table

Protected Species

Although protected areas can safeguard species within their boundaries, some animals and plants are so threatened or vulnerable that they need legal protection wherever they occur. For further information on Protected species click here.

Local Geodiversity sites

These sites provide examples of geology and geomorphology of regional and local importance, where the geodiversity resource can be conserved, so that people can enjoy and find out more about it. These sites can contribute to the quality of local environments and provide opportunities for recreation and informal education.

Geological Conservation Review sites come from an assessment of nationally and internationally important sites for geology and geomorphology. The site boundaries for these and un-notified GCR sites are available through SNHi: www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/local-designations/geological-conservation-review-sites

Local geodiversity sites are selected by voluntary geoconservation bodies such as local Geodiversity groups and Regionally Important Geological / Geomorphological Sites (RIGS) groups. Geology and other natural history enthusiasts, wildlife trusts, museums, geological societies, teachers, planners and site owner, participate in the running of RIGS groups. More information on RIGS.

Nature Networks

A Nature Network connects nature-rich sites, restoration areas, and other environmental projects through a series of areas of suitable habitat, habitat corridors and stepping-stones. As well as supporting regional and national approaches to protect and restore nature, they provide local benefits to wildlife and people.

Connectivity is an essential part of nature. It is necessary for functioning and healthy ecosystems, key for the survival of animal and plant species, and is crucial to ensuring genetic diversity and adaptation to pressures such as climate change.

To ensure Scotland's nature can thrive, nature-rich areas must be connected through a series of networks linking them all together.

Back to Table

Air Quality

SEA objective – To improve or avoid adverse impacts to air quality and reduce emissions of key pollutants.

The impact of allocations on local Air Quality Management thresholds should be considered. For example, where an area is already close to exceeding air quality objectives, where an area is at risk of becoming an AQMA, or where sensitive development such as a hospital or residential use is proposed close to a busy road or a site regulated for emissions to air by SEPA. Such allocations may lead to an increase in the exposure of people to poor air quality.

SEA guidance on air provides advice on how to take air into account in SEA.

Back to Table

Population and Human Health

SEA Objective – To protect and enhance quality of life including maintaining and improving opportunities to access public open space and the natural and historic environment

Our surroundings are a key factor in determining our health and sense of well-being. Development plans set the context for clear development management decisions which will help deliver high quality green networks and protect and enhance natural heritage assets. Green Networks in Development Planning explains the background to green networks, their multi-functionality and provides development planning advice in respect of green networks. Planning authorities should also seek to prevent further fragmentation or isolation of habitats and identify opportunities to restore links which have been broken; Integrated Habitat Networks can be used here alongside green networks to ensure local biodiversity is maintained and enhanced

Human health can be affected by environmental factors which include pollution (e.g. emissions to air, soil or water from industrial processes including energy and waste management), flooding and climate change. Consideration of these issues, particularly in relation to location of sensitive development types, in site assessment will help to ensure that human health and wellbeing are integral to the plan.

Back to Table

Soil

SEA objective – To maintain or improve soil quality, quantity and function and prevent any further degradation of soils
To protect carbon rich soils and restore peatlands

Soils provide the following seven key functions:
- providing the basis for food and biomass production
- controlling and regulating environmental interactions (regulating water flow & quality)
- storing carbon and maintaining the balance of gases in the air
- providing valued habitats and sustaining biodiversity
- providing a platform for buildings and roads
- providing raw material
- preserving cultural and archaeological heritage

The assessment should consider the impacts of development on the relevant soil functions for the site. SEPA provides information on regulations that apply to soil and good practice guidance which is available at www.sepa.org.uk/environment/land/soil.

The Scottish Soil Framework provides a general framework to promote the sustainable, management and protection of soil consistent with the economic, social and environmental needs of Scotland. SEA guidance on soil provides advice on how to take soil into account in SEA.

The James Hutton Institute (formerly Macaulay) provides information on soil maps which are available from Scotland's Soils website.

Back to Table

Landscape

SEA objective – conserve and enhance landscape character and scenic value of the area and protect and enhance designated landscape areas

Designated Landscapes

Our fine scenery provides an inspiring backdrop for all who live in Scotland. Images of our unspoilt landscape also helps to market our tourism and film industries and world-renowned products such as whisky.

Our finest landscapes have been designated as either National Scenic Areas or National Parks. These include some of Scotland's most famous areas, from the Cuillin Hills to the Cairngorms.

Non-Designated Landscapes

High quality landscapes encourage us to venture into the outdoors. Having greenspace in our towns and cities, and easy access to our surrounding landscapes, brings vital benefits to our health and well-being.

Each part of Scotland has a distinctive character, which helps to build our sense of place – both in our own localities and as a nation. Together, our diverse landscapes and townscapes provide a living canvas of Scotland's history, reflecting ways of life and traditions deeply engrained in our culture. Some landscapes are valued for their wild land quality.

Back to Table

Climatic Factors – Climate Change Mitigation

SEA objective – To reduce greenhouse gas emissions and increase resilience to the consequences of climate change

The Scottish Government's guidance Consideration of Climatic Factors within Strategic Environmental Assessment (SEA) provides useful guidance on how to determine whether a PPS is likely to have significant environmental effects.

Back to Table

Material Assets – Waste

SEA objective – To reduce waste and promote the sustainable use of resources

The Scottish Government's Zero Waste Plan sets out a vision of a zero waste Scotland where waste is treated as a valuable resource and not as a burden.

For allocations for the location of waste management facilities consideration should be given to the potential for adverse impacts which may arise from locating other new development in the vicinity of proposed / existing waste sites and on the potential risk the proposal would pose to people or property. The local authority Environmental Health department is best placed to advise on site specific considerations.

Back to Table

Cultural Heritage (including the historic environment)

SEA Objective – To protect and promote the historic environment

SEA Sub Objectives:
- To protect and enhance historic environment assets and their settings
- To promote and enable the retention of historic environment assets
- To make the historic environment more climate resilient and to reduce emissions from the historic environment
- To promote and enable access, understanding and enjoyment of the historic environment

Settlement level:
Consideration should be given to the likely implications and opportunities for the historic environment arising from the spatial strategy. This will involve considering the likely significant effects for historic environment assets (and their settings), and places.

Strategic considerations:
Our historic environment is not only a finite resource that requires protection but one that also delivers the places and spaces that are key to our everyday lives, cultural identity and sense of place. Our historic built environment provides us with much of our housing stock, offices, infrastructure, public buildings and parks and gardens and therefore our use, maintenance and adaption of these assets is key to a sustainable future and our health and wellbeing.

Scotland's new strategy for the historic environment Our Past, Our Future (OPOF) was published in April 2023. The strategy sets the direction of travel for the historic environment sector and identifies the priority areas of action to focus work to support this mission. The 3 priorities are *Delivering the transition to net zero, Empowering resilient and inclusive communities and places* and *Building a wellbeing economy*. The importance of the contribution that the maintenance, reuse and adaptation of our historic environment can make in preventing waste and reducing carbon emissions is recognised under the transition to net zero priority.

Scotland's current landscape is the product of natural processes and human activity operating over many centuries, and both natural and historic aspects should be considered when developing policies and proposals at the landscape scale. Proposals should protect and promote the overarching importance of the historic environment to a sense of place. They should take account of the capacity of settlements and surrounding areas to accommodate development without damage to their cultural and historic significance. This reflects the policies contained within both the National Planning Framework and The Historic Environment Policy for Scotland (HEPS). HEPS is a policy statement for decision making for the whole of the historic environment for use at all levels. All the policies and principles in HEPS are likely to be relevant to strategic decisions around the allocation of land depending on context, with HEP2, HEP4 and HEP5 highlighting the importance of sustainable decision making and planning for the future use of historic assets and places.

Historic Environment Scotland's Portal holds locational information on national designations (including downloadable datasets) including designation records, scheduled monument consents and decisions. The relevant council area Historic Environment Records will also be a key resource for information on historic environment baseline including for non-designated assets.

Back to Table

Moray Local Development Plan 2027

Effectiveness Checklist for Development Sites

Site Details				
Name of the site				
Site address				
OS grid reference				
Site size (in hectares)				
Current land use				
Neighbouring land uses(s)				
Designated in MLDP 2020?	Yes ☐		No ☐	
	If yes, please specify:			
Land type	Previously ☐ Developed		Greenfield ☐	
Include an Ordnance Survey plan (1:1250, 1:2,500 or 1:5000). The site boundary should be outlined in red and show proposed points of access etc.				

Your Details	
Name	
Organisation (if applicable)	
Address	
Telephone/Mobile number	
Email address	

Ownership		
Are you	Sole Owner ☐	Part Owner ☐
	Agent ☐	Developer ☐
	Register Social Landlord ☐	Option to Purchase ☐
	No Legal Interest ☐	
If not sole owner, state owner(s) and provide contact details		
Do these owners know this site is being proposed for development	Yes ☐	No ☐
If 'Option to Purchase', please provide details (timescale, area of site etc.)		
Are there any legal factors which may prevent, or restrict, development? (e.g. wayleaves, restriction on land use, rights of way, ransom strips, access issues, visibility splay ownership etc.)	Yes ☐	No ☐
	If yes, please specify:	

Indicative Proposal		
Brief description of proposed use		
If residential, what number of units is proposed?		
If other uses, what is the proposed site area (ha) or floorspace (sq. m)?	Business and offices	
	General industrial	
	Storage and distribution	
	Retail	
	Other (please specify)	

Delivery			
What year do you expect development to start?			
Projected delivery timeframe from LDP adoption in 2027	Short ☐ (2027-2030)	Medium ☐ (2031-2033)	Long ☐ (2034-2037)
Indicative residential completions per year	Y1 -	Y2 -	Y3 -
	Y4 -	Y5 -	Y6 -
	Y7 -	Y8 -	Y9 -

	Y10 -	Y11>	

Planning History

Any previous planning history or consents in the last 10 years?	Yes ☐	No ☐
	If yes, please specify:	
Has contact been made with the Planning Authority in relation to the proposal?	Yes ☐	No ☐
	If yes, please specify:	

Potential Constraints

Is the site affected by any physical constraints (e.g. substations, pylons, underground cables, rivers/burns etc.)?	Yes ☐	No ☐	Don't know ☐
	If yes, please specify:		
Is any part of the site at risk from flooding?	Yes ☐	No ☐	Don't know ☐
	If yes, have any assessments been carried out:		
Is the site subject to any potential contamination issues?	Yes ☐	No ☐	Don't know ☐
	If yes, have any assessments been carried out:		
Is the site affected by any other potential constraints (e.g. service or access connections)?	Yes ☐	No ☐	Don't know ☐
	If yes, please specify:		