

Moray Local Landscape Designation Review – July 2018**Response to Consultation Responses**

General			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
George Brown	In general, applaud the findings of the report and seek assurances that all planning applications in a designated area will be assessed against the cSLA Statement of Importance with justification to any objections referenced to the Review. Considerable emphasis to be placed on developments being sympathetic to landscape.	Comments on support noted. The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.	
Findhorn and Kinloss Community Council (FKCC)	Support the proposed designations. Suggest that management recommendations address the increasing problem of littering. Reference to RAF Kinloss should be Kinloss Barracks as it is no longer a RAF station.	Comments of support are noted. Comments regarding littering will be passed to Direct Services. Noted.	References to RAF Kinloss to be changed to Kinloss Barracks.
Friends of Ben Rinnes	Full agreement with the proposals to designate certain areas as SLAs.	Comments of support are noted.	
Bob Fuller	Full agreement with the proposals to designate certain areas as SLAs.	Comments of support are noted.	
Historic Environment Scotland	Welcome the preparation of the review and its	Comments of support are noted.	

General			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	recommendations. Supports the consideration given to each candidate Special Landscape Area (cSLA) in terms of its future management and the setting out of a suite of recommendations for the management of the existing resource and advice on the consideration of development proposals within the areas.		
Kirsty McCann	Agree to the preservation of all the areas proposed.	Comments of support are noted.	
Scottish Natural Heritage	<p>Process has very successfully teased out the many assets that combine in Moray's landscapes, building that sense of place, connection and affection.</p> <p>The Review will be a valuable resource which influences the understanding of developers and expands their approach to design and help all of us to recognise proposals that could be accommodated without compromising the landscape qualities.</p>	Comments of support are noted.	
The Moray Council – Transportation	Preferred route for the A96 dualling through Moray will require to be accommodated within some cSLAs and would pass close to others, including	Noted, at the time of writing no preferred route has been announced.	

General			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>new local loads to connect the dualled A96 to the existing road network.</p> <p>No reference to future road improvements in the Statement of Importance for the Findhorn Valley, Spey Valley, Quarrelwood and Cluny cSLAs.</p> <p>Update of text/assessments advised once the preferred route for the dualling of the A96 has been announced.</p>		
Janet Trythall	<p>Support proposals to give greater weight to landscape when determining planning matters.</p> <p>Areas in which there are wind farms, such as Cabrach, should not be valued lower as a result because the landscape will be restored at the end of the life of the windfarm.</p> <p>Hopes that any protection from inappropriate development under existing landscape-based designations, such as the Coastal Protection Zone, will not be downgraded.</p>	<p>Comments of support are noted.</p> <p>Scottish Planning Policy (SPP) assumes that windfarms are likely to remain in perpetuity. Even if this is not the case there is opportunity for local landscape designations to be reviewed in the future. The Dorenell wind farm was partially constructed during the field work for the study and has a significant landscape and visual impact on the Cabrach area.</p> <p>The MLDP 2020 will contain policies to sensitively manage</p>	<p>The document will be amended to reference Kinloss Barracks. All typos mentioned in the response will be amended.</p>

General			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>Figure 1 – disputes that whole area is 'Hard Coast' and that from Covesea village to Lossiemouth is very vulnerable dunes, similar to Lossie East Beach.</p> <p>Figures 3, 4 and 6 – concerns that certain information is not shown.</p> <p>Reference to RAF Kinloss should be Kinloss Barracks as it is no longer a RAF station.</p> <p>Concerns regarding wildflower arrays, their suitability and ongoing maintenance.</p>	<p>development within SLA's to ensure that any development is of the highest quality there are no detrimental impacts on the landscape.</p> <p>The Statement of Importance for the Burghead to Lossiemouth SLA states that the landscape becomes more uniformly sandy to the east near Lossiemouth.</p> <p>The document will be amended to reference Kinloss Barracks.</p> <p>The recommendation that wildflower arrays could be established applies to areas where there is low biodiversity (against farmland for example or within a presently mown cemetery).</p>	
Woodland Trust Scotland	<p>Welcome cSLAs from the point of view of woodland protection and believe such designations can help inform development management.</p> <p>Where appropriate, deer management should be listed as a management recommendation alongside</p>	<p>Comments of support are noted. The comments regarding deer management are welcomed and will be included in the management recommendations where appropriate.</p>	<p>Agree to include deer management in the management recommendations where appropriate.</p>

General			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	woodland creation.		

Policy			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Crown Estate Scotland (c/o Savills)	<p>Query whether these lists will be treated as material considerations or whether a policy will be developed to state how these designations will be dealt with. Clarity sought on the policy impact of cSLA and their “Sensitivity to Change” and “Management Recommendations”.</p> <p>Policies must be able to accommodate works and development which are important to sustaining the existing activities and settlements within them and recognise that these constitute features which have, in part, created the “specialness” of the SLA.</p>		
Mortlach Homes (c/o Aurora Planning)	cSLA should complement, rather than duplicate, other protective designations with regards to the natural or historic environment. Potential for additional complexity and confusion created by	The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for	

Policy			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>duplicating designations for the same area.</p> <p>Question as to exactly what level of protection is proposed in policy, and how this will interact with other policies and protections in practice.</p>	public consultation during January- March 2019.	
Pitgaveny (c/o Savills)	<p>Any measures to enhance public access resulting from the special characteristics of the SLA should be subject to specific consultation with the owners of, or operators on, the land.</p> <p>Policies must be able to accommodate works and development which are important to sustaining the existing activities and settlements within them and recognise that these constitute features which have, in part, created the “specialness” of the SLA.</p>	The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.	
The Findhorn Village Conservation Company (TFVCC)	There is a lack of affordable houses, to purchase or rent, in the Village of Findhorn. Over 40% of houses are holiday homes and the age demographic of the Village is growing more elderly. With the employment opportunities in	The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during	

Policy			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>the Moray area not providing salaries that enable young families to meet the cost of housing in Findhorn, the current demographic is likely to increase. TFCVCC is looking at how they can utilise areas within the village to potentially build affordable housing. TFCVCC is very aware of the importance of maintaining the historic and scenic beauty of Findhorn. We have identified one potential site that has already been requested to be included in the Moray Development Plan. There are other potential opportunities within the village for development which have not been fully investigated, some of these areas already have structures on them, therefore would not impact the dunes, beach and bay areas. Our concern is that building in the village of Findhorn will become so restricted that TFCVCC will not be able to take forward any plans to build affordable housing within the village. How will the Special Landscape proposal affect development in areas of</p>	<p>January- March 2019.</p> <p>TFCVCC is encouraged to contact the Council to discuss their proposals further.</p>	

Policy			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>opportunity within the Village?</p> <p>There are a number of tank blocks in Findhorn, some are visible and provide a historic reference. However, there are some that are hidden in gorse and have degraded. How will the Special Landscape proposal affect removal of tank block if required for development/access?</p>		

Culbin to Burghead Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Findhorn and Kinloss Community Council (FKCC)	<p>Support cSLA and the avoidance of further erosion of the remnant dune slack area.</p> <p>Suggests that the boundary in amended to include the historically important 12th Century Kinloss Abbey.</p> <p>The FKCC would wish to make particular reference to the area East of Findhorn, i.e. the dunes that extend from the Beach Road to the Findhorn Foundation and the Army Barracks. It is felt that there has not been enough</p>	<p>Comments of support noted.</p> <p>This is not considered an appropriate extension for the Culbin to Burghead Coast Special Landscape Area. Kinloss Abbey is a scheduled ancient monument and has a strong policy framework in place to recognise and safeguard its importance.</p> <p>The Special Landscape Area boundary covers a large part of the area east of the Beach</p>	

Culbin to Burghead Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>designation to this area. It is thought that the coast is covered by the tide marking but there is no specific designation for the area extending back from the coast through to Kinloss, including the area of the Findhorn Foundation. In these areas there is a unique landscape supporting a wide variety of lichens of international importance. It is surprising that it has not been recognised as an area of special scientific interest.</p>	<p>Road and the Findhorn Foundation. Some of this area is also identified and safeguarded as an ENV (environmental) designation in the Moray Local Development Plan 2015.</p>	
The Findhorn Village Conservation Company (TFVCC)	<p>Notes a consultation on proposed development at the Foundation, which on initial investigation would seem to result in the linking of the Foundation settlement to Findhorn Village through development of a road that will cross the dunes land to the Back Beach Road. As well as the impact to the dunes areas, this increase in development at the Foundation has the potential to limit the opportunities to develop areas within the Village, as the two settlements seem to be treated as one in the allocation</p>	<p>The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.</p> <p>TFVCC is encouraged to contact the Council to discuss their proposals further.</p>	

Culbin to Burghead Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>development policy.</p> <p>Notes that Findhorn is a major tourist destination in Moray which, without tourism, the local hotel, pubs, restaurants, shops and businesses would not survive. Seeks that the provision of motor homes and camping facilities are looked at within the village, whilst retaining the natural aspects of the sites.</p> <p>Sea defences were built along a stretch of the back beach and steps were put in place to enable access over the sea defences, staggered along the length of the defences. The sea defences and steps have been eroded and TFVCC is in discussions with The Moray Council to repair/replace the steps. A reduced number of steps retain will concentrate access over the dunes slack area to three points, which will have an impact on these areas and concentrating the footfall accessing the beach. As part of the Special Landscape proposal, will access to the dunes and beach be looked at</p>		

Culbin to Burghead Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>so it is accessible whilst limiting impact on the environment?</p> <p>Since the development at the Findhorn Sands Caravan Park of wooden chalet/lodges, there has been a significant amount of land cleared adjacent to the Back Beach Road. TFCVCC appreciates that this is private land, but will this be something that will be monitored under the Special Landscape proposal?</p>		
Woodland Trust Scotland	Agree with proposal and management recommendations.	Comments of support are noted.	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Paul Bray	Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line. Important to protect the area south of Hopeman and there should be no large building areas.	Comments of support are noted.	
A. Charlesworth	Fully support the cSLA	Comments of support are	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.</p> <p>Hopeman is a small but close community that can easily be eroded and undermined by excessive and unnecessary development and hopes that approach is supported at local and national levels.</p>	noted.	
Janice Craib	<p>Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.</p> <p>Small and very close community in Hopeman and unnecessary development would destroy this for the future.</p>	Comments of support are noted.	
Carmen Gillies	<p>Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.</p> <p>Future proofing of landscape is</p>	Comments of support are noted.	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	vital for future generations - over development cannot be undone. Hope that local and national governments adhere to policy.		
David Gillies	<p>Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.</p> <p>SLAs must be given the status they require to protect our most valued landscapes in Moray, especially the beautiful village and coastline of Hopeman.</p>	Comments of support are noted.	
Juliet Govier	Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line. Important to protect the area from mass development.	Comments of support are noted.	
Hopeman/Burghead Community (182 responses)	Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.	Comments of support are noted.	
Ann Kelman	Fully support the cSLA	Comments of support are	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.</p> <p>Abundance of sea birds, dolphins and the beauty of the seascape and landscape needs to be preserved and not be spoiled by the encroachment of housing etc.</p>	noted.	
Ken MacDonald	Wholeheartedly supports the Review's findings regarding cSLA. Moray relies heavily on tourism and associated services and is pleased that the Council is placing attention and importance on maintaining one of Moray's most valuable resources.	Comments of support are noted.	
Mary MacDonald	Concerns regarding overdevelopment in Hopeman and the impact on the beauty of the area and tourism. Supports the Review.	Comments of support are noted.	
Kirsty McCann	Agree to the preservation of all the areas proposed. Concerns of overdevelopment in Hopeman and the impact on the natural coastline and beauty.	Comments of support are noted.	
Paul O'Flaherty	Fully support the cSLA	Comments of support are	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>Burghead to Lossiemouth Coast in order to protect and enhance the special character and beauty of the Moray coast and keep its villages as a community.</p> <p>Protects the coastline from over use, erosion and keeps the wildlife balance.</p>	noted.	
Pitgaveny (c/o Savills)	<p>Appear to propose the inclusion of whole built-up areas of the town, which do not in themselves contribute to the special criteria of the cSLA. In particular, they include two areas of ground in Pitgaveny ownership, at Sunbank Quarry and Inchbroom Road which are not of outstanding merit. The setting of the older original town is accepted as important to the integrity of the cSLA.</p> <p>Recommend that the boundary be amended to exclude the more modern built-up areas of the town in the south and south-west while retaining the more "characterful" streets in the SLA. It is also not clear why existing allocations are included within the SLA</p>	<p>Many of the settlements within Moray make a strong contribution to the character of the landscape. Settlements have therefore been included in the Burghead to Lossiemouth SLA area, as is the case in other national and local landscape designations and indeed in National Parks.</p> <p>The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.</p>	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	and what the impact might be.		
Tanya Price	<p>Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line.</p> <p>Issues like these should be discussed with local people and reflect their wishes rather than government dictating.</p>	Comments of support are noted.	
Colin & Pat Redmond	Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line. No more houses.	Comments of support are noted.	
Springfield Properties (c/o McCreddie Design)	<p>Detailed response submitted.</p> <p>Reference to SNH/HS Guidance 2017 which isn't due to be published until 2019 and therefore could not be referred to in appraisal of review.</p> <p>Believe that the southern boundary of the cSLA includes an area of land that bears none of the qualities or values of the Hard Coast Landscape for which the cSLA is</p>	<p>The local landscape review was undertaken in accordance with the approach advocated in the SNH/HES guidance on reviewing local landscape designations where cultural heritage, recreational and nature conservation value are considered together with scenic qualities in a more holistic approach as to what compromises landscape.</p> <p>The southern boundary of this</p>	No change.

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	recognised and has been proposed for designation. Leads to inconsistency in the application of SLAs in this area, undervaluing the key attributes of this landscape and effectively introducing a “buffer zone” around part of the cSLA, which is inconsistent with Scottish Planning Policy (SPP). Propose that boundary is redrawn to follow the route of the B9040 and thereby exclude the land south of Hopeman and Cummingston.	<p>area aims to encapsulate coastal character and the immediate backdrop to the coast where the distinct pattern of coastal settlements can be appreciated. The ridge behind the coast also features a community woodland and footpaths on Clarkly Hill which were considered to be important to include when considering recreational value and potential links between the coast and inland.</p> <p>Local landscape designations do not always accord with landscape character types (LCT) as they often incorporate a number of LCT's as this increase scenic diversity which is the holistic approach advocated in the SNH/HES guidance to reviewing landscapes.</p> <p>The comparison with the North Aberdeenshire Coast SLA is not relevant in this case as the context and landscape features are different.</p> <p>The comments regarding the</p>	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
		use of Special Landscape Area rather than Local Landscape Area advocated in SPP are not valid. The steering group agreed the use of the term SLA as this better reflects the specialness of these landscapes. The term 'local' does not adequately express the accolade aspects of these designations.	
Alex Sills	Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line. Any development that would expand Hopeman would be damaging to the beauty and life of the village	Comments of support are noted.	
Zoe Sills	Fully support the cSLA Burghead to Lossiemouth Coast in order to protect and enhance the special character and quality of Hopeman village and its coast line. Any development that would expand Hopeman would be damaging to the beauty and life of the village	Comments of support are noted.	
Janet Trythall	Support proposed boundary which follows the ridge of	Support Noted.	

Burghead to Lossiemouth Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>Clarkly Hill and south of Hopeman and Covesea.</p> <p>Conflict of interest with Clashach Quarry which is a Site of Special Scientific Interest (SSSI).</p> <p>Important that any development along this stretch of coast does not impinge on the view of the coastal ridge from seaward or the view from of the coast from the ridge.</p> <p>Tourism development should not be permitted out with Hopeman, Lossiemouth or Burghead in this cSLA as it will destroy the very nature of the asset.</p>	<p>There is no conflict of interest, the current CPZ, which will be replaced by the SLA, covers Clashach Quarry. Many places benefit from having multiple natural and built heritage designations.</p> <p>The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.</p>	

Lossiemouth to Portgordon Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Crown Estate Scotland (c/o	Broadly supportive of the	Support noted.	

Lossiemouth to Portgordon Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Savills)	management recommendations but seek further detail relating to offshore wind farm development and clarity on the phrase “beyond the immediate setting.” The consented offshore wind farms in the outer Moray Firth (Moray and Beatrice) and areas identified by Marine Scotland in the emerging Sectoral Marine Plan for Offshore Wind, do not reflect Crown Estate Scotland’s understanding of ‘immediate setting’.	Additional text will be added to all coastal SLA’s stating; <i>‘Offshore wind farm development should be located some distance from this coast so as to appear to be clearly associated with the outer Moray Firth rather than inland waters in order to conserve the expansive simplicity of the immediate seascape’</i>	
Pitgaveny (c/o Savills)	Appear to propose the inclusion of whole built-up areas of the town, which do not in themselves contribute to the special criteria of the cSLA. In particular, they include two areas of ground in Pitgaveny ownership, at Sunbank Quarry and Inchbroom Road which are not of outstanding merit. The setting of the older original town is accepted as important to the integrity of the cSLA. Recommend that the boundary be amended to exclude the	No boundary change is proposed in response to this comment. Many of the settlements within Moray make a strong contribution to the character of the landscape, examples of this are the tightly clustered coastal settlements which accommodate many traditional buildings and have a notably strong architectural integrity. Moray is also well-known for its many 18 th /19 th century planned settlements and these commonly provide a focus in the landscape and	

Lossiemouth to Portgordon Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	more modern built-up areas of the town in the south and south-west while retaining the more "characterful" streets in the SLA. It is also not clear why existing allocations are included within the SLA and what the impact might be.	often having a strong relationship to landscape features such as rivers and/or the foot of hills. Settlements have therefore been included in the SLA area, as is the case in other national and local landscape designations and indeed in National Parks.	

Portgordon to Cullen Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Crown Estate Scotland (c/o Savills)	Broadly supportive of the management recommendations but seek further detail relating to offshore wind farm development and clarity on the phrase "beyond the immediate setting." The consented offshore wind farms in the outer Moray Firth (Moray and Beatrice) and areas identified by Marine Scotland in the emerging Sectoral Marine Plan	Support noted. Additional text will be added to all coastal SLA's stating; <i>'Offshore wind farm development should be located some distance from this coast so as to appear to be clearly associated with the outer Moray Firth rather than inland waters in order to conserve the expansive simplicity of the</i>	

Portgordon to Cullen Coast			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	for Offshore Wind, do not reflect Crown Estate Scotland's understanding of 'immediate setting'.	<i>immediate seascape'</i>	

Lower Spey and Gordon Castle Policies			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Crown Estate Scotland (c/o Savills)	<p>Crown Estate Scotland is supportive of the management guidance for the Lower Spey SLA. Note a change of terminology from "recommendations" to "guidance".</p> <p>As this is an extensive designation, across the estate, CES would wish further dialogue and an opportunity to comment on any planning policy being put in place given the potential impact this could have on a large area of the Estate</p>	Support noted.	
Morlich Homes (c/o Aurora Planning)	Concerns of duplication with Historic Environment Scotland's Inventory of Gardens and Designed Landscapes. No clear reason	Several of the candidate SLA's include Inventory listed designed landscapes, SSSI's and other designated features/areas. This is not	No change

Lower Spey and Gordon Castle Policies			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>as to why the Lower Spey Valley and Gordon Castle should be treated as one cSLA.</p> <p>Propose that boundary is amended to cover the Lower Spey Valley area only and exclude the Gordon Castle designed landscape which is already subject to protection.</p>	unusual when defining local landscape designations and accords with the approach advocated in SNH/HES guidance on reviewing local landscape designations where cultural heritage, recreational and nature conservational value are considered together with scenic quality in a more holistic approach as to what compromises landscape.	
Woodland Trust Scotland	Agree with proposal and management recommendations, subject to specific reference to native trees in the planting considerations.	Comments of support noted	

Spey Valley			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Crown Estate Scotland (c/o Savills)	Designation covers land to the south of Fochabers which is both allocated in the current LDP and in the emerging LDP 2020. It is not clear how the designation could impact on these allocations or on potential further development	The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during	

Spey Valley			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>opportunities to the south and east of Fochabers as the policy is not yet detailed and therefore propose an amendment to boundary to exclude area to south of Fochabers.</p> <p>Referring to the “Sensitivity of Change” and “Management Guidance”, Crown Estate Scotland considers that part of the character of this area is the interaction of human activity and settlement with the natural environment and consider that dispersed settlement pattern with single houses in the countryside is already a part of the landscape in this area and should be regarded in a more positive light.</p> <p>Concerns regarding reducing the scope for people to live in these rural areas as Moray has a strong tradition of self-building which other parts of the country are trying to encourage. With appropriate design guidance and care in the development management process, new homes with a quality of design appropriate to</p>	January- March 2019.	

Spey Valley			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	this area could be supported and should be valued as a part of the area's character rather than viewed purely negatively.		
George Brown	Glenallachie and Milltown of Edinville should be included in either the Spey Valley or Ben Rinnes cSLAs. Consideration should be given to proposed solutions to the treatment of sewage ass this would impact landscape.	It is agreed that the valley where Milltown of Edinville is located is more akin to the Spey Valley cSLA than the hills or remoter glens of the Ben Rinnes cSLA. On that basis, it is agreed that the valley can be included in the Spey Valley cSLA.	The cSLA boundary will be amended to include the valley and Milltown of Edinville.
Edinville Community Hall Council (EHC)	Endorse the cSLA. Concerns with the increasing number of houses being built/proposed in area.	Comments of support are noted.	
Friends of Ben Rinnes	Believe the communities of Edinville and Ben Rinnes should be included in either the Spey Valley or Ben Rinnes cSLAs. Concerns with the increasing number of houses being built/proposed in area and measures to reduce further development in rural communities should be encouraged.	It is agreed that the valley where Milltown of Edinville is located is more akin to the Spey Valley cSLA than the hills or remoter glens of the Ben Rinnes cSLA. On that basis, it is agreed that the valley can be included in the Spey Valley cSLA.	The cSLA boundary will be amended to include the valley and Milltown of Edinville.
Bob Fuller	Believe the communities of Edinville and Ben Rinnes should be included in either the Spey Valley or Ben Rinnes cSLAs. Concerns with the increasing number of houses	It is agreed that the valley where Milltown of Edinville is located is more akin to the Spey Valley cSLA than the hills or remoter glens of the Ben Rinnes cSLA. On that basis, it	The cSLA boundary will be amended to include the valley and Milltown of Edinville.

Spey Valley			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	being built/proposed in area and measures to reduce further development in rural communities should be encouraged.	is agreed that the valley can be included in the Spey Valley cSLA.	
Speyside Area Forum	Endorse the cSLA.	Comments of support are noted.	
Woodland Trust Scotland	Agree with proposal and management recommendations for continuous cover forestry. Propose that it be specified that development likely to impact these areas of woodland should be located away from these sites.	Noted. The policy framework for considering development proposals within SLA's and within woodlands will be set out in the Proposed Moray Local Development Plan 2020, which will be subject to public consultation during January 2019 to March 2019.	

Findhorn Valley and the Wooded Estates			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
John Cudworth	Consideration should be given to extending the cSLA to include the Knock of Braemoray and surrounding moor, which contains a Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC) and evidence of a stone circle.	As part of the review a rigorous evaluation of landscape character across Moray was undertaken. The Knock of Braemoray was considered, however, it was concluded that it does not form an integral part of the Findhorn valley. Given the proximity and likely influence of the consented Cairn Duhie wind farm, it would be a small area to designate.	No change

Findhorn Valley and the Wooded Estates			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
		<p>The connection with the Lochindorb SLA in Highland would be interrupted if this development is constructed.</p> <p>There will be an opportunity to review the SLA's at a later date should the context change.</p>	
Woodland Trust Scotland	Agree with proposal and management recommendations as development should not be encouraged in proximity to this important site.	Comments noted	

Deveron Valley			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Woodland Trust Scotland	Agree with proposal and management recommendations. Propose that, as changes to landscape as a result of forest practices are of concern, the practice of continuous cover forestry is included in the management recommendations.	Accept that the practice of continuous cover forestry is included in the management recommendations.	The document will be amended to include the practice of continuous cover forestry is included in the management recommendations where appropriate.

Spynie			
--------	--	--	--

Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Pitgaveny (c/o Savills)	<p>cSLA is entirely within Pitgaveny and includes an area being considered for future development (mixed use) and is a formal submission known as site EL9 to the MIR earlier this year.</p> <p>The field in question fronts the A941 and is seen as an integral part of the field and woodland structure of the total area and forms an effective western boundary. However, it may also have the potential envisaged in the MIR submission, for a northern expansion of site I8, as a natural extension of the town. There is a need for clarification over the potential impact not only on adjoining sites already allocated in the adopted LDP, but on candidate sites currently under consideration for LDP2020.</p> <p>The same field is traversed by the northern option line for the A96 bypass of Elgin and its inclusion in the proposed SLA would therefore have to ensure that any proposed roadworks be to a very high environmental standard, and</p>	<p>The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.</p> <p>The Council would welcome more detailed discussion with Pitgaveny Estate on the policy framework for SLA's and the implications for the issues highlighted in the response.</p>	

Spynie			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>this would need to be reflected in the policies yet to be drafted. For both these reasons, it may be advisable not to confirm the inclusion of this particular field in the Spynie SLA designation, until such time as decisions have been taken on the above development possibilities.</p> <p>In bullet point 2 of the Management Recommendations in the Statement of Importance for the proposed Spynie SLA it states: "Avoid any development, whether in this or the surrounding area, which adversely affects the qualities of seclusion and tranquillity that can be experienced in this landscape". Concerns that this recommendation, if treated as a "material consideration" in the planning process or if taken through into planning policy could have an impact on development out with the boundaries of the specific Spynie SLA. With no boundaries, the ability to interpret and apply this recommendation is very</p>		

Spynie			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	<p>challenging and could lead to considerable ambiguity in the planning process. While clearly the qualities of seclusion and tranquillity are very valued and valuable, this landscape designation is still in relative close proximity to the city of Elgin and therefore must also reflect the requirements of the city for growth over time. Further clarity is required as protecting the SLA is one thing, but having a broad-brush defence of the land out with the cSLA but considered to be affecting it, could be very restrictive.</p>		

Cluny Hill			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Woodland Trust Scotland	<p>Agree with proposal and management recommendations. Welcome the careful assessment of effects of major development surrounding this area. Believe area can be enhanced by additional native woodland planting.</p>	Comments noted	

Quarrelwood			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Janet Trythall	Support the cSLA due to its importance for geology.	Comments of support are noted.	
Woodland Trust Scotland	Agree with proposal and management recommendations. Suggest that buffers of land or native tree planting can be established in areas under threat from development	Comments noted. The MLDP contains policies to protect trees located on development sites and where they are located immediately outwith.	No change

Ben Rinnes			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
Crown Estate Scotland (c/o Savills)	<p>Concerned, in the absence of any draft policy, that the sensitivities and management recommendations are geared towards reducing new homes in the countryside. For example the statement: "The accumulation of new single houses in the countryside which could affect the rural character of these generally sparsely settled glens and contrast with the scale and design of more traditional buildings".</p> <p>There is a view that well designed new homes in the countryside can contribute to the landscape character and</p>	The policy framework for considering development proposals within Special Landscape Areas will be set out in the Proposed Moray Local Development Plan 2020, which will be available for public consultation during January- March 2019.	

Ben Rinnes			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	therefore policies which support high quality rural design would be a more progressive way to approach this area to support its economy and facilities.		
George Brown	Glenallachie and Milltown of Edinvillie should be included in either Spey Valley or Ben Rinnes cSLA. Consideration should be given to proposed solutions to the treatment of sewage ass this would impact landscape.	It is agreed that the valley where Milltown of Edinvillie is located is more akin to the Spey Valley cSLA than the hills or remoter glens of the Ben Rinnes cSLA. On that basis, it is agreed that the valley can be included in the Spey Valley cSLA.	The cSLA boundary will be amended to include the valley and Milltown of Edinvillie.
Edinvillie Community Hall Council (EHC)	Endorse the cSLA. Concerns with the increasing number of houses being built/proposed in area.	Comments of support are noted.	
Friends of Ben Rinnes	Believe the communities of Edinvillie and Ben Rinnes should be included in either the Spey Valley or Ben Rinnes cSLAs. Concerns with the increasing number of houses being built/proposed in area and measures to reduce further development in rural communities should be encouraged.	It is agreed that the valley where Milltown of Edinvillie is located is more akin to the Spey Valley cSLA than the hills or remoter glens of the Ben Rinnes cSLA. On that basis, it is agreed that the valley can be included in the Spey Valley cSLA.	The cSLA boundary will be amended to include the valley and Milltown of Edinvillie.
Bob Fuller	Believe the communities of Edinvillie and Ben Rinnes should be included in either the Spey Valley or Ben Rinnes	It is agreed that the valley where Milltown of Edinvillie is located is more akin to the Spey Valley cSLA than the hills	The cSLA boundary will be amended to include the valley and Milltown of Edinvillie.

Ben Rinnes			
Body or Person(s)	Summary of Representation(s)	Officers Comments on Representations	Recommendation
	cSLAs. Concerns with the increasing number of houses being built/proposed in area and measures to reduce further development in rural communities should be encouraged.	or remoter glens of the Ben Rinnes cSLA. On that basis, it is agreed that the valley can be included in the Spey Valley cSLA.	
Speyside Area Forum	Endorse the cSLA.	Comments of support are noted.	
Woodland Trust Scotland	Agree with proposal and management recommendation, particularly additional native woodland creation.	Comments of support are noted.	