



# TOPIC PAPER

## Environment

### MORAY LOCAL DEVELOPMENT PLAN 2020



DECEMBER 2017



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# INTRODUCTION

# 1

## Introduction

This paper is one of a number of core background documents prepared to support the Moray Local Development Plan 2020. The opportunities to address environmental issues and maximise opportunities for the enhancement of the natural environment through the planning process are explored within this paper.

## National Planning Policy

The environment is an important part of our cultural identity and contributes to our health and wellbeing and economic prosperity.

Scottish Planning Policy (SPP) seeks to support economically, environmentally and socially sustainable places by;

- supporting climate change mitigation and adaptation including taking account of flood risk;
- having regard to the principles for sustainable land use set out in the Land Use Strategy;
- guiding renewable energy proposals to the least environmentally sensitive locations;
- protecting, enhancing and promoting access to cultural heritage, including the historic environment;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- reducing waste, facilitating its management and promoting resource recovery; and
- avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.

## Moray 2026 - A Plan for the Future

Moray 2026 seeks to promote Moray as an area of diverse natural beauty where people choose to live, learn, work and enjoy. The protection and enhancement of Moray's distinctive high quality environment is considered to significantly contribute to achieving this ambition.

## Context

Moray's high quality environment is a valuable asset. The natural and historic environment contributes significantly to the distinctive character of the area. Protecting and enhancing nature is an essential part of delivering sustainable development. It is essential to create places that are more resilient to climate change, that have distinctive local character, and in which people want to live, work and visit, places that promote wellbeing, productivity, educational benefits and places where communities can actively engage with their local environment.





From wind farms to housing in the countryside there are many environmental challenges and pressures. The current policy framework provides policies that guide development proposals in respect of a whole range of environmental issues ranging from climate change and flooding to pollution and drainage.

In general the policy framework is operating effectively and the main challenges for the next plan are identified below.

This paper sets out: -

- A review of the key environmental issues.
- How to identify, expand, protect and enhance green infrastructure.
- How to promote and enhance biodiversity and better connect people with nature.
- How to protect and enhance Moray's urban and rural landscape.
- How to embed climate change and deliver sustainable development.
- Outcomes for LDP 2020.

### Providing Green Infrastructure

Moray's towns and villages benefit from good access to high quality greenspace providing recreational opportunities. The existing policies protect greenspaces and provide a framework to ensure new provision is well located and to a high standard. The recently adopted Open Space Strategy Supplementary Guidance sets out standards for quality, accessibility and the quantity of open space to deliver high quality greenspaces and will be embedded into policy.

Green infrastructure is a network of multi-functional green space, both new and existing, both rural and urban, which supports biodiversity and ecological processes and is integral to health and quality of life. It delivers a broad range of functions and provides socio-economic, cultural and health and wellbeing benefits. Green infrastructure includes all greenspaces, woodlands, parks, allotments, sustainable urban drainage systems, green roofs and street trees.





Green Infrastructure is a cross cutting topic and overlaps with many policy areas within the LDP including climate change, biodiversity, open space and placemaking. The current LDP does not set out a strategic approach to plan positively for the creation, protection, enhancement and management of green infrastructure.

The LDP2020 should aim to create and enhance green infrastructure across the area and maximise the potential to meet a diversity of functions, including wildlife habitat, recreation, flood alleviation and placemaking. Green infrastructure should aim to enhance the character and distinctiveness of an area with regard to habitats and landscape type and should thread through and surround the built environment and connect towns and villages to the wider countryside.

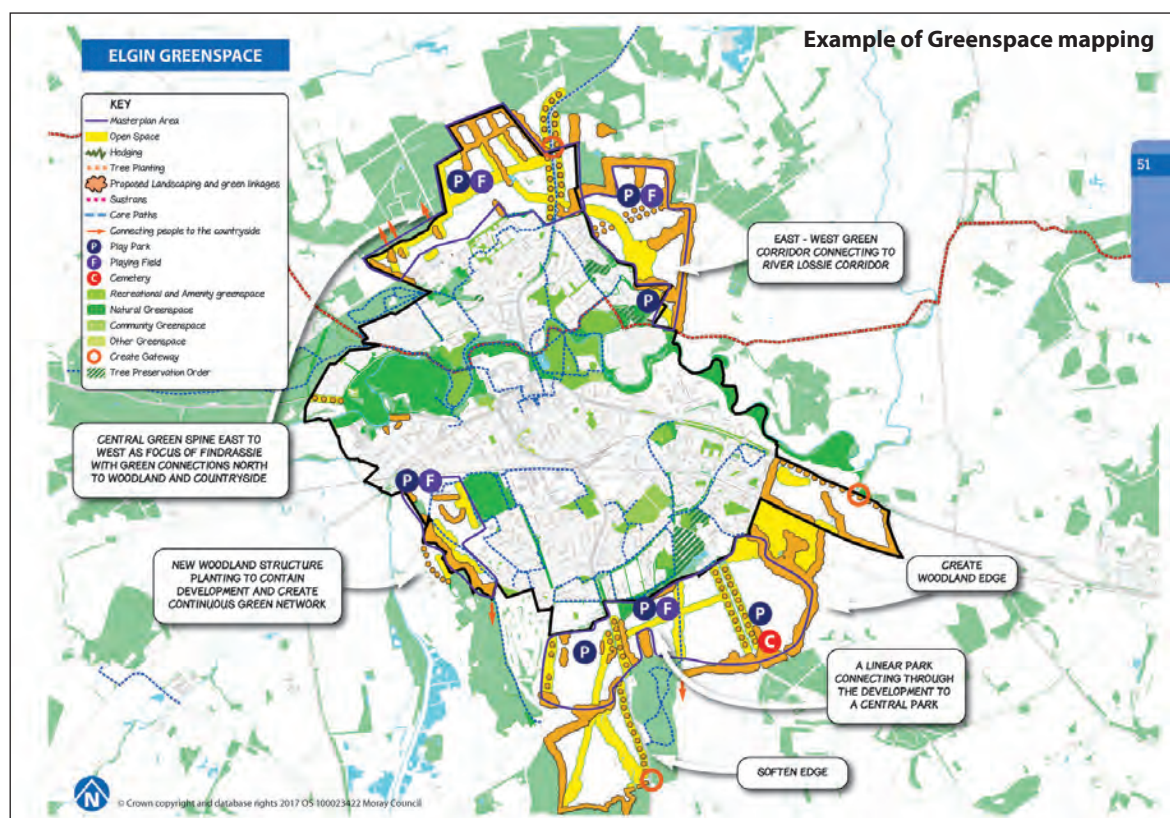
There are a number of ways to embed green infrastructure into the LDP as follows:

- Embed green infrastructure delivery into Placemaking and Green Spaces policies.

- Identify and map existing green networks in an effort to preserve and prevent fragmentation.
- Identify broad areas where green networks creation/expansion opportunities exist.
- Identify settlement level mapping at individual town level.
- Identify local green network opportunities for key sites for inclusion in masterplans, development briefs and site designations.

It is proposed to prepare greenspace mapping for the main towns, identifying green infrastructure that needs to be provided, taking account of opportunities to enhance linkages to create connected green networks.

Reference to the provision of green infrastructure should also be added into policy and included within the following policies; placemaking, development principles and green spaces. For example “New developments must provide green infrastructure as required in the green network mapping.”



### Nature conservation

The diversity of habitats and species in Moray contribute towards the overall high quality environment. Moray has a number of international, national and local conservation area sites and is home to a number of iconic protected species. These are valuable assets that need to be protected from inappropriate development. There are established policies in place that are working well to safeguard these natural assets.

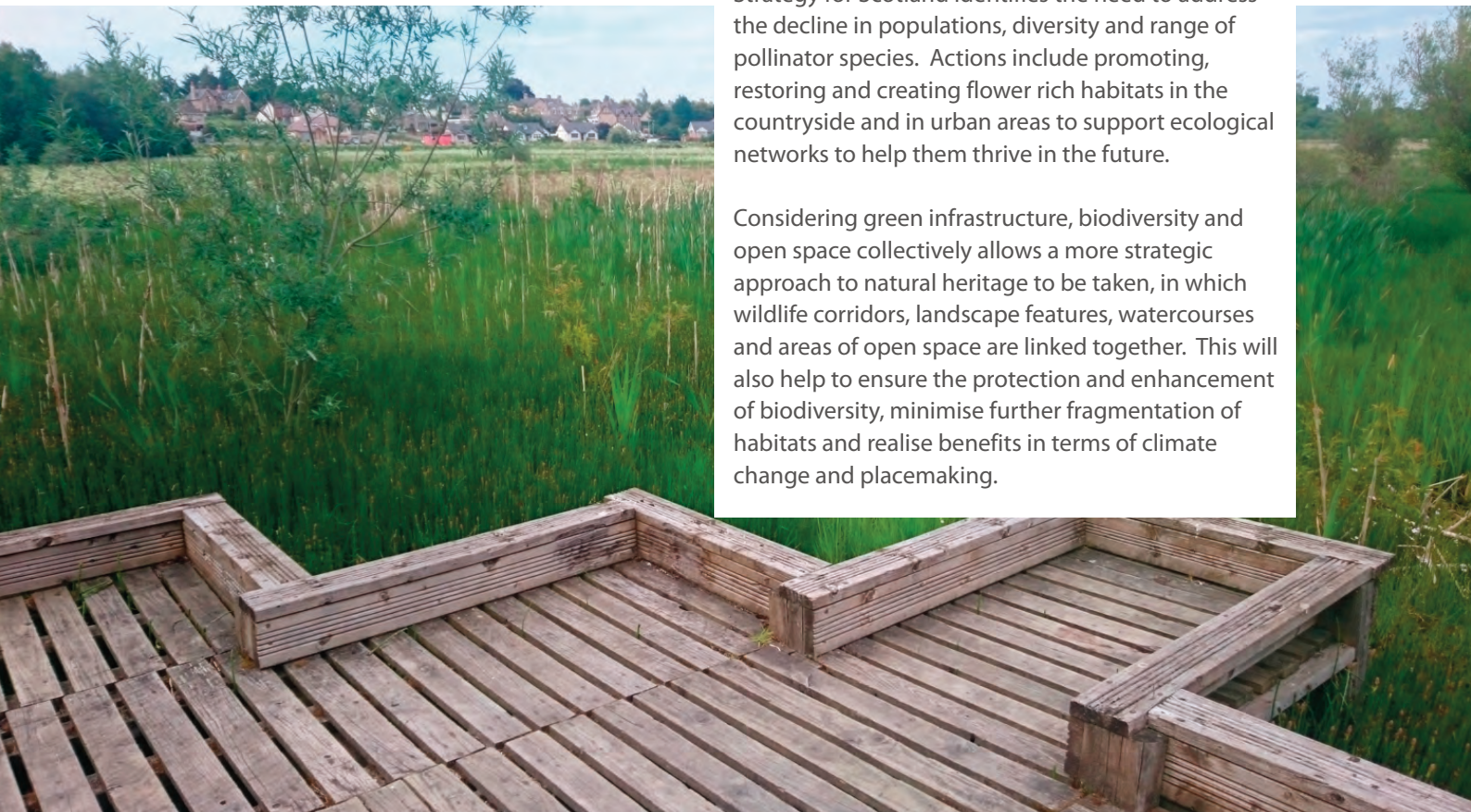


### Safeguarding and Enhancing Biodiversity in New Developments.

The provision of green infrastructure and biodiversity are closely related. The current natural heritage policies ensure that the effect of development proposals on important species and habitats is taken into account. There is however a lack of guidance on how to promote and enhance biodiversity and halt biodiversity decline. Biodiversity is important to environmental, social and economic wellbeing and therefore needs to be considered strategically.

New development will have an impact on wildlife and nature conservation and therefore, there is a need to place greater emphasis on identifying and promoting opportunities for improving biodiversity. Providing green infrastructure would bring biodiversity benefits through the creation, expansion and enhancement of green networks. New development must do more by planting diverse species to promote and enhance biodiversity. The recently published Pollination Strategy for Scotland identifies the need to address the decline in populations, diversity and range of pollinator species. Actions include promoting, restoring and creating flower rich habitats in the countryside and in urban areas to support ecological networks to help them thrive in the future.

Considering green infrastructure, biodiversity and open space collectively allows a more strategic approach to natural heritage to be taken, in which wildlife corridors, landscape features, watercourses and areas of open space are linked together. This will also help to ensure the protection and enhancement of biodiversity, minimise further fragmentation of habitats and realise benefits in terms of climate change and placemaking.







### Protecting Landscape Quality

Moray's high quality landscape helps to create a unique place that is locally distinctive. There are pressures on the landscape from wind energy, in particular on the edge of the Cairngorms National Park as well as proposals for solar arrays, grid connections and housing in the countryside. Safeguarding is in place with Countryside Around Towns (CAT) designations around the main towns restrict development and require careful planning in the transition area between the town and country, preserving the connection between communities and the wider countryside. The Coastal Protection Zone (CPZ) seeks to safeguard the special qualities of this part of the Moray landscape by seeking to prevent inappropriate development on the coast.

At present there are identified Areas of Great Landscape Value (AGLV's) that cover a significant part of Moray, these are areas where the scenery is highly valued and the landscape should not be damaged by inappropriate development. Scottish Natural Heritage is undertaking work to produce a revised landscape character assessment for Moray and Nairn. This raises the relevance and function of the broad brush approach currently taken to landscape issues and whether AGLV's should be renamed as Special Landscape Area's (SLA's) and replaced with a landscape character area based approach that recognises the distinctive character and special landscape qualities of the particular landscape types across Moray.

Woodlands and forests cover 33% of Moray and make an important contribution to quality of life, landscape, health, wildlife and biodiversity, recreation, education and local amenity, flood management and reducing the impacts of climate change. These woodlands and forests need to be protected and carefully managed to deliver multiple benefits. There are policies in place to deliver compensatory planting to mitigate woodland removal. The Moray Woodland and Forest Strategy Supplementary Guidance seeks to promote new woodland creation adjacent to settlements and will offer the opportunity to link these to proposed green networks threaded through the main towns.



## Environmental Resources

The current policies provide an effective framework to ensure the sustainable use of natural resources including prime agricultural land, woodlands, mineral reserves and consider opportunities for renewable energy generation. There is limited vacant and derelict brownfield land, so the nature of Moray with relatively small urban areas means the release of greenfield land to meet housing land requirements. This approach impacts upon the countryside around our towns and therefore the transition from urban to rural areas is important. The natural environment is also recognised as a resource for recreation, biodiversity and associated health benefits.

## Built Heritage

Moray benefits from a number of important sites for cultural heritage, townscapes and buildings have distinctive characteristics and provide variety across the area. This heritage contributes greatly to the character of Moray and provides a sense of place and identity. The current policy framework is working well to protect, conserve and enhance the historic environment; it is proposed to condense the policies into a single succinct and focused policy.



Elgin Skyline

## Environmental Protection

There is a policy framework in place to protect the environment from adverse impact. Flooding policies seek to direct development away from areas of flooding and ensure new development does not increase the possibility of flooding elsewhere. New development must enhance the water environment through the use of sustainable urban drainage systems (SUDS). These policies are well established and it is not proposed to significantly amend them.



Hopeman coastline

## Coastal Erosion

The recently published Dynamic Coast: Scotland's National Coastal Change Assessment has highlighted that parts of the Moray coast are eroding more quickly than anticipated. This needs to be recognised in policy as it has potential implications for agriculture, tourism, transport, infrastructure, buildings, cultural and natural heritage interests.

## Delivering on Climate Change

Despite being a primary policy in the current LDP, it is not considered climate change has been effectively embedded or delivered through the current plan. The required sustainability checklist has not advanced the delivery of sustainable development in Moray. Developers have instead continued to meet or slightly exceed the current Building Standards Regulations and there has been no significant increase in the use of renewable technologies, sustainable construction techniques or use of local materials.

Consideration needs to be given to embedding climate change across the LDP, possibly by strengthening delivery through all policies. There is obvious overlap with the primary policy on placemaking and there may be an opportunity to strengthen climate change within the quality audit process. Many aspects of the identified actions to address climate change can be accommodated in the quality audit process including passive solar gain, use of sustainable materials, SUDS and sustainable transport. It is important that these are incorporated in a meaningful way.

The proposal for a strategic approach to green infrastructure is seen as having potentially significant local climate change benefits in terms of natural flood management, biodiversity and habitat creation.





### Renewable Energy and Low Carbon Technology

Strengthening climate change across the policies and seeking climate change action through the placemaking policy and quality audit process does not deal with all aspects of the current climate change policy.

In particular there is a desire to support and promote zero and low carbon technologies in new developments. It is acknowledged that the absence of a target within the current LDP has made it difficult to require developers to install these technologies.

The 2008 Moray Development Plan included a carbon emission reduction policy related to delivering the required Building Standards emission reductions through the use of low and zero carbon technologies. Reintroducing a policy of this nature has resource implications in terms of assessing calculations to confirm compliance.

Set out below are examples of approaches from elsewhere.



Solar panels in Forres

### Dundee Local Development Plan 2014

Low and Zero Carbon Technology in New Development

Proposals for all new buildings will be required to demonstrate that at least 10% of the carbon emissions reduction standard set by Scottish Building Standards (2007) will be met through the installation and operation of zero-carbon generating technologies. This percentage will increase to 15% from the beginning of 2016 and will be reviewed in 2018.

This requirement applies to all new buildings with the following exceptions:

- 1) Alterations and extensions to buildings.
- 2) Change of use or conversion of buildings.
- 3) Ancillary buildings that stand alone and cover an area less than 50 square metres.
- 4) Buildings which will not be heated or cooled, other than by heating provided solely for frost protection.
- 5) Buildings which have an intended life of less than two years.

A statement will be required to be submitted demonstrating compliance with this requirement.

### Fife Plan 2017

Planning permission will only be granted for new development where it has been demonstrated that; The proposal meets the current carbon dioxide reduction target (as set out by the Scottish Building Standards) and that low and zero generating technologies contribute at least 20% of these savings.

### Edinburgh City Council Local Development Plan 2016

Planning permission will only be granted for new development where it has been demonstrated that: the current carbon dioxide emissions reduction target has been met, with at least half of this target met through the use of low and zero carbon generating technologies.





### Developing Heat Networks

Moray relies on centralised gas and electricity, and oil in rural areas, for most of its heating needs. The Scottish Government is promoting local heat networks as a feasible and efficient way of providing heat and electricity. District heating is most suitable where there is a high density of built development and an anchor development creating a constant demand for heat. Moray has a significant number of heat sources in the form of distilleries; however these are remote from populations and in areas that lack identified development sites.

At present insufficient research has been undertaken to identify district heating/heat network opportunities in Moray. The Scottish Government has produced the Scotland Heat Map and this will be used to screen sites and identify opportunities to utilise excess heat. There is a requirement for Phase 2 of the Elgin South Masterplan to investigate the feasibility of utilising excess heat from a nearby distillery.

### Sustainable Construction and Use of Local Materials

Moray has an excellent resource in the form of the Findhorn Ecovillage which is an internationally recognised leader in sustainable design and construction. The LDP policies should do more to promote sustainable construction techniques and the use of locally grown timber in new developments.

The Moray Woodland and Forestry Strategy highlights the opportunity to promote the use of locally grown timber in new buildings. The strategy recognises there are specialist architects throughout the area who have considerable expertise in using local timber and encouraging this through policy offers the opportunity to develop demand for locally grown timber. Opportunities for this will be explored with local architects with a specialism in the use of local timber.



Findhorn Ecovillage





# LDP 2020 OUTCOMES

# 2

Identified outcomes based on the key issues are set out in the table below.

Environmental Issues	Assessment	Outcomes for LDP 2020
<b>Green Infrastructure Provision</b>	Lack of policy to promote strategic approach to the delivery of green infrastructure.	<p>Embed green infrastructure into policy (open space/green space, development proposals or placemaking)</p> <p>Prepare mapping to support identification and expansion of green infrastructure.</p>
<b>Enhancing Biodiversity</b>	Need to strengthen approach to biodiversity enhancement	Delivery of green infrastructure and connecting blue and green networks will have positive impacts on biodiversity. Biodiversity benefits should be highlighted within approach to green infrastructure. Embed enhancing biodiversity in the quality audit process.
<b>Delivering on Climate Change</b>	The current policy is not working as intended and not improving the sustainability of new developments in Moray.	<p>Revisit climate change as principle policy. Consider alternative means of embedding climate change through the LDP (placemaking).</p> <p>Consider incorporate/strengthening essential climate change principles into quality audit and design principles for new developments. Investigate options for requiring use of renewable/low carbon technologies and the use of local timber.</p>
		Require large scale developments to investigate feasibility of energy centres etc. utilising Scotland's heat map.





Environmental Issues	Assessment	Outcomes for LDP 2020
<b>Protecting Landscape Quality</b>	<p>The current Areas of Great Landscape Value are blanket designations that cover large areas of Moray and do not focus on the special qualities of specific parts of Moray and why it is important to protect them.</p> <p>Cumulative build-up of housing in the countryside is having a negative impact on landscape quality.</p>	<p>Consider revised landscape character assessments to replace blanket AGLV designation.</p> <p>Review Countryside Around Towns (CAT) boundaries.</p> <p>Prepare new housing in the countryside policy.</p>
<b>Built Heritage</b>	<p>There are well established policies covering build heritage that are working well.</p>	<p>Amalgamate into single policy.</p>













