



MAIN ISSUES REPORT

MORAY LOCAL DEVELOPMENT PLAN 2020



DECEMBER 2017

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MAIN ISSUES

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The Main Issues Report is a key stage in preparing the Moray Local Development Plan 2020 as it sets out what the Council considers to be the main land use planning issues facing Moray over the next 10-15 years.

The Report highlights the main challenges we face and our proposed approach to addressing them, including how we will meet our housing needs, provide more affordable homes, how we will try and integrate communities better, how we will provide more land for new and expanding businesses and create more employment opportunities, how we will safeguard our fantastic environment, promote biodiversity and create better green spaces.

The Report proposes a strong emphasis on developing better “places” for people to live, work and enjoy, and recognises that good quality places maintain and improve the quality of life we enjoy in Moray. The Report also starts to highlight and encourage debate and discussion about the wider benefits planning can bring, how we can plan for our ageing population and future healthcare requirements, encourage less use of cars in favour of more walking and cycling.



We are doing a lot of work co-ordinating future infrastructure needs, working with NHS Grampian, Scottish Water and Council officers in Education and Transportation services to collectively understand when and where we need facilities such as new health centres, schools and road improvements and ensure these are planned in advance of development taking place.

It is essential that as many people as possible get involved at this early stage of preparing the Plan and I encourage you to let us know your comments and suggestions. This is your opportunity to help shape the future of Moray.

A handwritten signature in black ink that reads "Marc J.R. Macrae". The signature is written in a cursive, slightly stylized font.

Marc Macrae
Vice-Chair, Planning and Regulatory Services Committee
Moray Council



HOW TO RESPOND TO THE MAIN ISSUES REPORT

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Moray Council wants to hear your views on the main land use planning issues in Moray and our proposed approach to addressing the issues. A series of questions have been set at the end of each chapter and your comments are invited on them and on the proposals set out on the settlement maps.

Responses should preferably be made electronically using the online response form available at www.moray.gov.uk/mainissuesreport but separate e-mail or paper responses can be sent to;

Local Development Plan Team

Development Services,
Moray Council,
Council Offices,
High Street,
Elgin IV30 1BX

e-mail localdevelopmentplan@moray.gov.uk

**The deadline for comments is 5pm
30th March 2018.**

All comments received will be summarised and reported to a future meeting of the Council's Planning and Regulatory Services Committee with proposed responses.



INTRODUCTION

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The town and country planning system in Scotland is “plan-led” and the Council has a statutory responsibility under the Town and Country Planning (Scotland) Act 2006 to prepare an up to date Local Development Plan. Local Development Plans identify how much growth is proposed for land uses such as housing and employment and set out a wide range of policies which are used to determine planning applications. The policies cover topics ranging from protecting our natural heritage, creating quality open spaces to providing affordable and accessible housing.

The Local Development Plan is prepared taking account of a range of national and local drivers covering a broad spectrum of issues including delivering housing targets, creating employment opportunities and supporting economic development, protecting our environment, providing good health and education facilities, generating electricity from renewable sources, addressing climate change, addressing health challenges we face such as obesity and dementia and the aspiration to reduce inequalities, improve life chances and for everyone to enjoy a good quality of life. Doing nothing is not an option and the Local Development Plan is an important “tool” in addressing these issues.

There are five main stages in preparing a Local Development Plan as shown in the diagram below. The Council is currently at stage 2, Main Issues Report which highlights what the Council considers to be the main land use planning issues and explores options for addressing those issues.

The new Local Development Plan should be adopted before the end of July 2020 as current planning legislation requires the Plan to be reviewed and replaced within 5 years of adoption, ensuring it is kept up to date and relevant to current land use planning issues.

The process prepare the Local Development Plan involves extensive public consultation and engagement with key stakeholders, some of which has already taken place and has informed this Main Issues Report. Key evidence is listed in this report and highlighted in the 5 background Topic Papers which are available at www.moray.gov.uk/mainissuesreport

The Council has carried out two rounds of Call for Sites which has generated approximately 200 bid submissions seeking new/ amended or carried forward land use designations. These have been assessed by the Council and technical consultations carried out if deemed appropriate. The bids and the Council’s assessment are shown on the proposal maps. Detailed site checklists are available at www.moray.gov.uk/mainissuesreport

“Houses make a town but citizens make a city”

Rousseau

The planning system in Scotland is currently being reviewed and it is likely that in future this Main Issues Report stage will be replaced with a draft Plan stage. To allow as much time as possible for discussion the Council has provided some additional detail such as a suite of draft policies to provide an option on how the main issues might be addressed.



WHAT ARE MAIN ISSUES?

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The Main Issues Report aims to highlight strategic level land use planning issues and to identify what the main land use issues affecting Moray's towns and villages are. The Main Issues Report is required to consider options and alternatives which are set out in the following chapters. Nine main issues have been identified, with many of them inter-linked, especially around the need to deliver quality places and address climate change adaptation.

There are clearly many other issues to be addressed in the final version of the Plan, however the nine main issues discussed in this report are considered to be issues where a new policy or change in direction is required to deliver the desired outcomes and where the status quo is either simply not an option or considered to be an unacceptable option.

The next stage in the process, following public consultation and considering all responses, is for the Council to prepare a Proposed Plan, which is the "settled view" of the Council. The Proposed Plan sets out a lot more detail on policies and land use designations. In some towns and villages, no additional land designations are proposed, so they do not appear at this stage in the process. Details of existing designations proposed to be carried forward are set out in the Housing Land Topic Paper.

Evidence Base

This Main Issues Report is relatively concise, with further information and detail set out in a series of documents which together form the evidence base. All of these documents can be viewed online at www.moray.gov.uk/mainissuesreport



Topic Papers- on Housing Land, Employment Land, Infrastructure, Environment and Rural Housing.

Strategic Flood Risk Assessment

State of the Environment Report

Strategic Environmental Assessment

Site Assessment checklists

Housing Need and Demand Assessment 2017

Housing Land Audit 2017

Employment Land Audit 2017

Moray Local Development Plan 2015 annual Monitoring Report 2017.



The Moray Local Development Plan 2020 is required to set out a vision. The proposed vision is set out below, supported by a series of objectives.

People want to live, work and invest in Moray because of the outstanding quality of life and environment.

Plan Aims/Objectives

- Apply a placemaking approach to development to create sustainable, welcoming, well connected and distinctive places that are safe, healthy and inclusive.
- Provide a generous supply of housing land to meet the needs of various sectors of the market.
- A strong framework for investment that provides sufficient land for development
- Identify and provide for new social and physical infrastructure to support the expanding population whilst safeguarding existing infrastructure.
- Promote the vitality and viability of town centres.
- Encourage efficient use of land and promote low carbon and sustainable development
- Protect and enhance the built and natural environment
- Improve resilience of the natural and build environment to climate change.



Q1. Do you agree with the proposed vision and objectives? If not, what alternative do you propose?



MAIN ISSUE 1 THE PROPOSED GROWTH STRATEGY

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LDP2020 Growth Strategy

In previous Development Plans, growth has been concentrated in Moray's 5 main towns, with Elgin as the primary centre and the secondary centres of Forres, Buckie, Keith and Lossiemouth.

However, it is proposed to change this in the MLDP2020 for the following reasons;

- Lossiemouth is constrained due to environmental designations and noise issues associated with RAF Lossiemouth.
- Growth of Keith is significantly slower than in Buckie and Forres.
- Growth in Forres has slowed due to the closure of RAF Kinloss and the single regiment of army personnel deployed at Kinloss Barracks.
- Growth in the secondary school centres of Aberlour and Fochabers has been very slow. Both these centres offer a very good range of services and secondary schools.
- Sites in smaller villages have not come forward as housing in the countryside development continues at a high rate.

Options/ Alternatives:

In determining the preferred growth option, the following options have been considered;

- 1) Elgin as the primary growth centre will accommodate all new development in Moray;
- 2) A level of development proportionate to each town and village reflecting population size, provision of services, constraints, facilities and development pressure for housing and employment land;
- 3) A new town within the Elgin-Forres A96 corridor to accommodate development growth in Moray.

Preferred Option

The first option has been discounted as it would not match the need and demand for housing and employment land and would not support existing services and communities outwith Elgin.

The preferred Growth Strategy focuses new development in the primary growth centre of Elgin and to a smaller, proportionate extent in the secondary growth centres of Forres and Buckie, and tertiary growth centres of Lossiemouth, Keith, Fochabers and Aberlour. This hierarchy reflects population size, access to services and jobs and development pressure for housing and employment. New development in smaller towns and villages that are served by these larger growth centres will be proportionate to their size and provision of services and facilities. Where there are limited services and facilities or there is landscape capacity or character issues then no growth may be proposed. In Lossiemouth, Keith, Fochabers and Aberlour, the emphasis will be upon delivery of existing designated sites rather than designating additional land. This will involve planners exploring how to overcome constraints on sites to bring them forward for development within the plan period and providing much needed housing land in these areas.

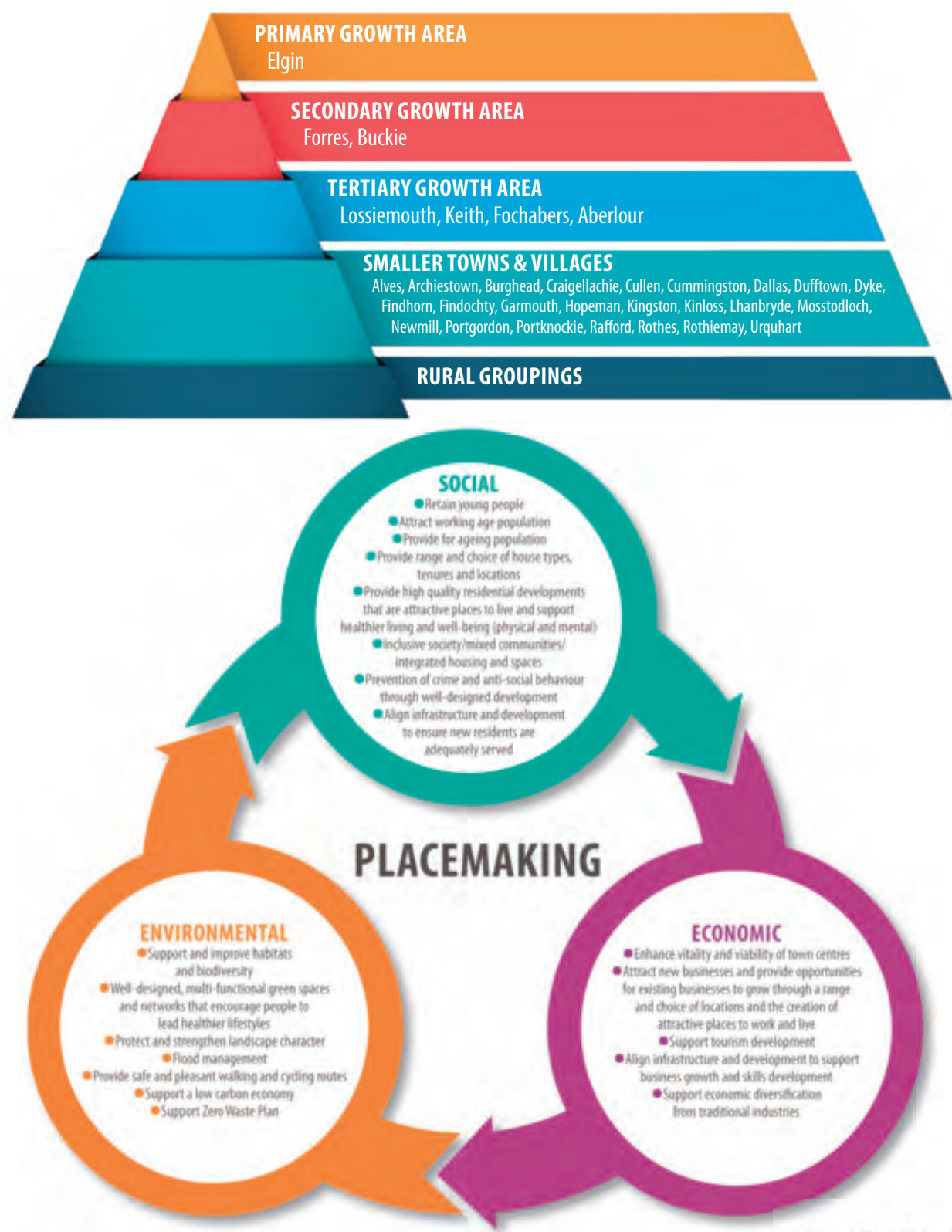
Beyond the LDP2020 plan period, in Elgin City and the larger towns of Forres and Buckie, new development will become further and further away from services and facilities located centrally. To ensure a sustainable pattern of development the principal of a new town is suggested along the Elgin-Forres A96 corridor and this will be identified as an option to be explored and researched further in the Delivery Programme to accompany the MLDP2020. A similar approach has been taken at Tornagrain (Highland) and Elsieck (Aberdeenshire) to create new towns in greenfield locations to high design standards starting with a relatively "blank canvas".

Q2. Do you agree with the proposed Growth Strategy? If not, what Strategy do you propose?

Q3. Do you agree with the proposal to undertake further research into the potential for a new settlement along the A96 corridor between Elgin and Forres as a long term option?



Growth Strategy LDP2020 - The diagram below shows the proposed Growth Strategy and Social, Economic and Environmental issues to be addressed and the central role of Placemaking.



SPATIAL STRATEGY



MAIN ISSUE 2 PROVIDING A GENEROUS AND EFFECTIVE SUPPLY OF LAND FOR HOUSING

Scottish Planning Policy requires planning authorities to identify a generous supply of land for housing and to plan for a 20 year period. The evidence base for calculating how much land we need for housing is set out in the Housing Need and Demand Assessment (HNDA) 2017 which identifies a need and demand for an average of 304 units per annum between 2018 and 2035. However this need is not evenly distributed throughout this term. It is concentrated in the first 5 years, to allow for existing housing need to be met. Therefore 424 units are required per year between 2018 and 2022, reducing thereafter. This is higher than annual new house build completions of around 350 houses, and makes provision of effective land for housing in the first 5 years key to addressing housing need.

Why do we need more land for housing?

The Council has had over 3,000 people registered on the housing waiting list for many years and the population and number of households in Moray continues to grow in line with national trends. Long term projections for Scotland show the population growing by 7% between 2017 and 2039 and the number of households growing by 14% within the same period. The projections also show that the average size of households will continue to lower, dropping to 2.1 persons per household by 2039. This reflects our ageing population, more people living longer and in smaller households. Housing need and demand is often hidden through issues such as several adults sharing the same house due to affordability issues and young people living at home for longer as they also can't afford their own home.

The HNDA figures are based upon demographics, local trends and economic factors and assume a high migration assumption. While this may be affected by Brexit, Moray Council's approach to ensuring a generous supply of land for housing brings wider benefits in terms of;

- Long term planning for infrastructure (see Main Issue 5 below)
- Promoting a masterplanned approach to growth areas

Options/ Alternatives

- Take a short term approach to land supply. This would not be consistent with the Growth Strategy or Scottish Planning Policy, would not address housing need and would not promote an infrastructure first approach.
- Take a longer term approach to housing land supply, promoting masterplanning and infrastructure co-ordination and ensuring an effective housing land supply is maintained through the plan period.

Preferred option

The preferred option is to continue with a longer term approach, which has worked successfully since 2008.

How is the housing land requirement calculated?

To calculate how much new, additional housing land has to be identified in the MLDP2020, the existing land "zoned" for housing, which is considered to be "effective", free of constraints and available to develop within 5 years, is deducted along with any other sites which are considered 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 which shows the housing land requirement calculation.

For the MLDP2020 the Council proposes to add 30% generosity onto the baseline HNDA figure of 5473 housing units between 2018 and 2035, making a total housing land requirement of 7115 units, representing 395 units per annum, which is proposed to be the annual housing land supply target, with the target for completions being 304 units per annum with a shorter term housing land supply target of 470 units between 2018 and 2023, 366 units thereafter.

The proposed generosity figure of 30% is higher than the figure in Scottish Planning Policy, which suggests a generosity figure of 10-20%. The current MLDP15 added 50% generosity to both the Elgin and Speyside Local Housing Market Areas (LHMA's) to ensure a good supply of land was available.



The proposal of 30% generosity for MLDP2020 is intended to ensure enough land is available in the right places to meet unexpected demand and to ensure the land supply is flexible and responsive to adapt if some sites do not come forward for development or are slower to develop than anticipated.

It is therefore proposed that the additional housing land requirement of 1700 units is met through; Elgin LHMA 1200 units, Forres LHMA 250 units and Buckie LHMA 250 units. The current Local Development Plan has a number of LONG term housing sites designated and it is proposed that, in the first instance some of these sites are brought forward to meet the majority of sites, supported by smaller sites designated in some towns. In some areas, no additional land is proposed to be designated, however, the focus will be on working with developers and landowners to bring forward and overcome any constraints on the existing designated sites.

It is also 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 2018-2035**
304 units
- **Annual housing completion target 2018-2023**
424 units
- **Additional housing land requirement 2018-2035**
1700 units
- **Annual average housing land supply target 2018-2035**
395 units
- **Annual average housing land supply target 2018-2023**
470 units

These requirements are lower than the requirements set out in the current MLDP15, reflecting the evidence from the new HNDA that the backlog of need and demand is being met.

Table 1- Housing Land Requirements to 2035.

LHMA	Housing Supply Target to 2035 (A)	Proposed Flexibility (B)	Housing Land Requirement (A+B=C)	Existing effective supply (D)	Sites Effective 5yr+ (E)	Projected completions 2017-2021	Constrained supply	Additional housing land requirement (C-D-E)	Split by LHMA
Buckie	5473	30%	5473+1642	330	60	266	807	7115-4094-	250
Elgin				2304	1230	1410	6484	1320	1200
Forres				1066	10	392	911		250
Keith				303	10	157	313		*
Speyside				91	10	71	532		*
Total	5473	1642	7115	4094	1,320	2296	9047	1701	



Affordable housing

It is proposed to continue with the current policy requirement for all developments of 4 or more houses to provide 25% affordable units in accordance with Scottish Planning Policy. Since 2011 the Council has been implementing a new build programme which aims to build 70 houses per annum. Housing associations also have development projects in Moray. Addressing housing need is hampered by capacity issues across the affordable rented sector and therefore delivery falls short of the number of affordable units required. There are also issues around how affordable and market houses are integrated and this is discussed in the section below on Creating Quality Places.

Accessible housing/ Housing Mix

Moray faces a significant challenge with its projected ageing population and people's desire to live and be cared for in their own home 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. It is proposed to review this policy to deliver more accessible bungalows and further link the mix of units (market and affordable) to be developed back to the Housing Need and Demand Assessment.

Housing Mix must also reflect the projected continual decrease in average household size, which will result in significantly more demand for smaller houses, terraces, semi-detached and flats.

The percentage of Moray's population aged 60 or over is projected to increase from 18.4% in 2014 to 28% by 2039.

Land supply is not generally problematic, but credible, effective land is in short and decreasing supply, where the risks and costs to enable viable development are often too great without intervention, especially in more rural and remote environments.

Stimulating Housing Development in the Highlands and Islands, Ipsos MORI study for HIE, October 2017.

Q4. Do you agree with the proposed annual Housing unit Supply Target of 304 units?

Q5. Do you agree with the proposed Housing Land Requirement and the proposed generosity figure of 30%?

Q6. Are there any sites identified for residential development which you do not consider to be effective and capable of being developed before 2030?



MAIN ISSUE 3 CREATING INTEGRATED, QUALITY HEALTHY PLACES

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Scottish Planning Policy requires planning authorities to enable the provision of a range of attractive, well designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places. Scottish Planning Policy identifies 6 key characteristics of a successful place;

- 1) **Distinctive**
- 2) **Safe and pleasant**
- 3) **Easy to move around**
- 4) **Welcoming**
- 5) **Adaptable, and**
- 6) **Resource efficient**

Moray Council aims to support the Scottish Government aspirations for better quality design as set out in Creating Places and Designing Streets and embed the above qualities into policy. Creating quality places brings much wider benefits in terms of attracting business and investment, encouraging good social interactions, a sense of neighbourhood and caring, encouraging healthy lifestyles and reducing crime.

Social Opportunity.
Public spaces, streets and communal buildings need to offer opportunities for intergenerational social interaction and activities, enabling older people to engage with public activity but also to rest, retreat and regard.

(Mobility, Mood, Place 2017).

In the MLDP2015 the Council introduced placemaking as one of three primary policies. To support the policy a Quality Audit process was introduced as a development management tool, with its origins in the Place Standard. The Audit brings together multi-disciplinary professionals to assess larger planning applications against 12 key criteria, which are scored using a traffic light system. Mitigation measures are identified which the developer is required to take account of in revising proposals to ensure compliance with policy.

Example of Quality Audit wheel



Options/ Alternatives

- Status quo- continue with the current policy approach and Quality Auditing process
- Revise the current Placemaking policy and Quality Auditing process to be much more aspirational and link placemaking with better greenspace planning, biodiversity, climate change and health issues.



Preferred option

In the MLDP2020, the Council aims to raise the aspirations for creating quality places, promoting variety and architectural interest into streets, providing open spaces with a clear function, reduced dependence on cars, promoting biodiversity in developments and designing developments to encourage more physical activity, social interaction, quality of life and mental wellbeing. The Council plans to work further with healthcare professionals to maximise links between land use planning and planning for a healthy society.

The primary policy on Placemaking has been revised which is set out in Appendix A and comments are invited on the draft policies.

An important aspect of good placemaking is to integrate communities and this has become a difficult issue for the Council over the last few years with no guidance in place. It is proposed to introduce policy guidance to improve integration of affordable and market housing, using criteria such as ensuring homes are architecturally tenure blind, that affordable and market houses share the same play areas and "blocks" of affordable homes are limited in size, with a wider range of tenures. These measures are intended to better integrate communities and improve life chances.

A key aspect of good placemaking is to provide quality green "infrastructure", which is the network of multi-functional green spaces, which supports biodiversity and ecological processes. However, sometimes new development has not provided the quality or quantity of multi-functional, well connected green spaces which we aspire to provide and further policy guidance is required to secure this provision.

We need to fully recognise the value of greenspaces and the wider benefits they deliver in supporting biodiversity and ecological processes, encouraging physical activity and mental wellbeing, mitigating flood risk and contributing to the quality of a place. It is important that the policies in the MLDP2020 continue to aspire to create quality well connected, accessible, multi benefit greenspaces which also

applies to water features, commonly referred to as blue corridors. Greenspaces should connect and form green corridors linking urban and rural areas, connecting people to the countryside.

Greenspace mapping has been prepared for Elgin, Forres and Buckie and it is proposed to extend this to other towns and villages when resources permit. Greenspace planning and biodiversity needs to be better integrated into the Council's Quality Auditing process for assessing larger planning applications, see Appendix A. New policies are proposed to promote and enhance biodiversity (see Main Issue7) in new developments, to require more native tree and hedge planting and habitat creation.

The Council has approved the Moray Open Space Strategy which sets out standards for quality, accessibility and quantity of open spaces to be provided in new development. This will be further embedded into the Council's Quality Audit process which will benefit from Scottish Natural Heritage staff participating.

Q6. Do you agree that a new policy promoting higher standards of design is required?

One in 11 early deaths could be avoided and £900 million could be saved every year if everyone met recommended levels of exercise such as walking for 20 minutes 5 days a week.

(RIBA City health check)



MAIN ISSUE 4
PROVIDING A
GENEROUS
EMPLOYMENT LAND
SUPPLY

14

Scottish Planning Policy (SPP) requires development plans to designate sites that meet the diverse needs of different types and sizes of business in a way that is flexible enough to accommodate changing circumstances. The top priority of the Community Planning Partnerships 10 year plan, Moray 2026, is “a growing, diverse and sustainable economy.”

What is the demand for employment land?

Sufficient land and buildings require to be available to facilitate economic development and diversify the economy. This supports the overarching aims of the Moray Economic Strategy 2012 of encouraging population growth, creating high quality jobs and raising earning levels.

Demand for small sites and buildings for industrial and business uses is greatest, with demand for medium sized sites primarily coming from existing business looking to grow. Demand for large sites from inward investors is small but large in terms of land take (100acres/40ha+).

Demand is seen to come from a mix of small start ups, renewables, digitally based businesses and decommissioning. Demand is greatest within the Elgin area, followed by Forres, and then by Buckie, Keith and Speyside.

How is the employment land requirement calculated?

An annual requirement of 10-12 acres/4-5 hectares per year has been identified through discussion with a working group with consideration given to build out rates and historic demand studies. This annual requirement is split across Market Areas as below:



Table 2 - annual employment land requirement by Market Area

The Scottish unemployment rate at March 2017 was 4.5%, with unemployment in Moray of 4.3%, however 5.5% of females in Moray are unemployed compared with 4.1% of females in Scotland.



Market Area	Effective Supply 2017 (general industrial)	Number of sites 2017	Predicted supply in years at 2020
Elgin	27.69ha/68.42acres	5	6.8 years
Forres	0.23ha/0.57acres	2	Less than a year
Buckie	16.03ha/39.6acres	3	16.8 years
Keith	3.81ha/9.41acres	3	6.4 years
Speyside	2.3ha/5.8acres	2	2.8 years

Table 3- Effective and predicted supply of employment land by Market Area

This requirement is applied to the existing supply of effective employment land for general industrial use to establish the number of years supply currently available. The effective land supply (land that is free of constraint and developable within 5 years) is monitored annually through the Employment Land Audit. This allows us to calculate the amount of land that needs to be identified in the plan to support economic growth.

Options/ Alternatives

- Identify a minimum level of employment land and no rural inward investment sites.
- Identify a longer term land reserve to ensure there is land available for business expansion and identify rural inward investment sites to attract new businesses into Moray which require a rural location.



Preferred option

As the Scottish Planning System moves to a 10 year period for Local Development Plans it is proposed to identify sufficient land to ensure there is a 5 year supply at the end of the plan period at 2030, i.e. the plan will identify a 15 year employment land supply. This could include land identified as a strategic reserve that can be brought forward through phasing or triggers.

The amount of additional land that requires to be identified in the plan is;

Elgin Market Area

57acres/23 ha of general industrial land, part of which could be identified as a strategic reserve

Forres Market Area

a minimum of 30acres/12ha of general industrial land.

Keith Market Area

minimum of 8.5acres/3.5ha of general industrial land.

Buckie Market Area

sufficient effective land, identify strategic reserve.

Speyside Market Area

minimum of 12 acres/4.8ha general industrial.

Within Elgin, Forres and Buckie there are six sites identified for higher amenity business uses. Over 74 acres/30ha of this over three sites is considered effective. There is also 27 acres/11ha of land available adjacent to the Enterprise Park, Forres. This is considered to be sufficient for the plan period.



How can we support delivery of serviced land?

The Employment Land Audit and working group discussions highlight that there is a severe shortage of serviced sites for immediate development. This could be because the viability of projects is marginal due to low land values. This puts off private speculative investment as returns are low. Another issue arises when landowners hold out for higher land values. An option to encourage release of land and aid viability is to allow a greater mix of uses across sites to help fund site infrastructure and get sites serviced for industrial and business uses. This could be to allow some higher value uses such as commercial, recreational or retail uses with a strict minimum level of industrial uses. Other options would be to actively explore compulsory purchase powers.

Identifying opportunities for large scale investment from outwith Moray (inward investment)

Whilst sites for large scale inward investment make up only a small amount of demand, the land requirements are significant. There is a need to identify opportunities for large inward investment of up to 100 acres/40 hectares. The scale of such proposals cannot be accommodated on sites within towns without significantly compromising supply levels for small and medium businesses. However, it is important that opportunities for such investment are identified to allow a choice of sites for inward investors to consider. This is important to ensure that Moray can compete with other areas to attract inward investment that has the potential to create significant numbers of jobs and grow the economy. Given the nature and size, large scale inward investment is most likely to be accommodated in rural areas. The Local Development Plan will identify a choice of large rural inward investment sites that will be reserved for large scale inward investment.

Q8 Do you agree with the levels of land to be identified for business and industrial uses?

Q9 Do you agree that industrial and business designations could include a greater mix of uses to help support servicing of sites?

Q10 Are there other ways that the plan can support delivery of land and industrial and business uses?

Q11 Do you agree that several large scale rural sites should be identified to direct inward investment opportunities?



MAIN ISSUE 5 TAKING AN INFRASTRUCTURE FIRST APPROACH

Scottish Planning Policy requires planning authorities to use action programmes to drive the delivery of planned developments to align stakeholders, phasing, financing and infrastructure investment over the long term. Modern, fit for purpose infrastructure is essential to support Moray 2026, the 10 year plan prepared by the Moray Community Planning Partnership, to provide the transportation, education, health and other infrastructure to support Moray's growing and ageing population.

The current ongoing review of the planning system in Scotland has highlighted the need for planning authorities to take an "infrastructure first" approach to support development, which Moray Council fully supports and aims to reflect in the MLDP2020. Planning officers have been working closely with a range of stakeholders including Council Transportation, Education and Flood alleviation teams and NHS Grampian, Scottish Water and Transport Scotland to plan the infrastructure requirements to support the growth proposed in the Moray Local Development Plan 2020.

Options/ Alternatives

There are not considered to be any viable options in terms of this topic, the planning system needs to be linked with community planning partners infrastructure requirements to plan for future provision. A do nothing option would be contrary to the direction of the current planning review.

Preferred option

To recognise the importance of taking an infrastructure first approach, it is proposed that a policy on infrastructure planning is included as one of three "primary" policies in the new MLDP2020. A summary of proposed new infrastructure is detailed below and shown on the Growth Strategy and proposal maps. Further information is set out in the background Topic Paper.

Education

A School Estate Strategy is being prepared by Education Services setting out longer term primary and secondary school requirements in Moray, aligned with the levels of growth proposed in the Moray Local Development Plan 2020.

The following new/ extended schools are proposed to accommodate the growth proposed in the MLDP2020.

Area School Group (ASG)	Education Infrastructure Requirement
Elgin Academy	1 x Primary School (450 pupil capacity) - Findrassie Masterplan area. Extension to Elgin Academy
Elgin High	2 x Primary Schools (450 capacity each)- Elgin South Masterplan area Extension to Elgin High
Forres Academy	1 x Primary School (450 capacity)- Lochyhill Extension to Forres Academy
Buckie High	3 - 18 Education Campus

Table 4: New/ extended school requirements to accommodate growth proposed in MLDP2020.



Healthcare

Planning officers work closely with NHS Grampian to align future growth with healthcare requirements for health centres, pharmacies and dental chairs. The table below identifies the new facilities and improvements to existing facilities which are required to support growth proposed in MLDP2020.

NHS Grampian requirements for new development.

- 1 GP per 1500 patients,
- 1 dentist per 1800 patients,
- 1 pharmacy per 4000 patients.

	Health Centre	Dental Chairs	Community Pharmacy
Elgin	1 new health centre for 7 GP's and support staff located within the Elgin South masterplan area Maryhill Health Centre: Extension to accommodate 4 additional GP's and support staff Elgin Community Surgery: Extension to accommodate 1 additional GP and support staff	5 additional dental chairs	1 additional pharmacy
Forres	Forres Health Centre: extension to accommodate 4 additional GP's and support staff	2 additional dental chairs	Reconfiguration of existing pharmacy outlets (location tbc)
Buckie	Ardach Health Centre: Future extension to accommodate 1 additional GP and support staff Seafeld & Cullen Medical Practice: Reconfiguration of existing practice to accommodate 1 additional GP and support staff		
Keith	Replacement health centre		
Lossiemouth	Moray Coast Medical Practice: extension to accommodate 1 additional GP and support staff		
Fochabers	Replacement health centre		
Rothies	Rothies Medical Centre: reconfiguration to create additional consulting space.	1 additional dental chair	
Dufftown	Rinnes Medical Practice: extension to accommodate 1 additional GP and support staff		
Aberlour	Aberlour Health Centre: reconfiguration to accommodate 1 additional GP and support staff.		

Table 5 New/ extended healthcare requirements to accommodate growth proposed in MLDP2020.



Transportation

Transportation infrastructure includes pedestrian and cycle, road (local and trunk), rail, air and sea routes. Well planned transportation infrastructure supports economic growth by connecting Moray to markets and services, promotes use of public transport and encourages active travel in preference to the private car, bringing health and environmental benefits.

National infrastructure - A96 dualling

In December 2011 the Scottish Government committed to completing the dualling of the A96 between Inverness and Aberdeen by 2030. In June 2017 Transport Scotland published route options for the western section from Hardmuir to Fochabers and carried out an extensive consultation exercise.

Dualling the A96 will bring significant economic benefits to Moray, reducing travel time to markets, helping to sustain, grow and attract new businesses and should reduce the rate and severity of accidents. However, these benefits need to be carefully balanced with the potential impacts upon Moray's outstanding natural and historic environment and the quality of life enjoyed by Moray residents and visitors.

The preferred route option is expected to be published in the second half of 2018 and may provide new opportunities for development sites.

National infrastructure- Rail improvements

A £170 million Aberdeen to Inverness Rail Enhancement Programme is currently being undertaken by the Scottish Government introducing a half hourly commuter service between Aberdeen and Inverurie with additional peak services between Inverness and Elgin. This improved service is being supported by the installation of new/ upgraded rail infrastructure which includes a new train station and straightening of the line at Forres, extension of platforms at Elgin train station and upgrading of signalling systems along the route. These improvements will encourage more use of rail services and bring significant business and tourism benefits to Moray.

Local Transportation Network

Moray's rural location means there will be a continuing emphasis on road transport, however this needs to be balanced by providing a network of opportunities for public transport and active travel (cycling and walking).

The Moray Local Transport Strategy 2 (MLTS2) sets out planned improvements to transport infrastructure and services in the area. More specific transport interventions for Elgin are set out in the Elgin Transport Strategy (ETS), which identifies improvements to the network to address the cumulative impact of allocated development within Elgin up to 2030. The improvements aim to improve pedestrian and cycle access, develop public transport, ease congestion and make travel around Elgin more predictable and consistent.

The ETS proposals are shown on the Elgin issues map. An integrated transport strategy will be prepared, subject to resources, for Forres and transport proposals (TSP's) will be identified for all other main centres of growth.

To support the Community Planning Partnership's vision of a healthier society, the Local Development Plan will include policies and proposals to support the Council's Active Travel Strategy, Core Path Plan and Open Space Strategy. This will require development to provide walking and cycling routes around new developments and link into existing networks.



New Forres Station



Moray's harbours are also an important part of the transportation network, providing an important commercial and tourism function. Buckie Harbour is the main commercial harbour with manufacturing, boat repair, cargo handling and fishing businesses in operation. Buckie harbour has significant potential for freight and operations and maintenance (O&M) for offshore renewables, having the capacity, supply chain links and geographic location to embrace further expansion.

Digital Connectivity

Super- fast broadband is essential for economic growth and modern business operations. In 2013 a £146 million Digital Scotland Superfast Broadband project started and now more than 20 towns and villages in Moray have access to superfast fibre broadband with speeds up to 24Mbps. However, a significant number of businesses and residences still do not have access to modern digital infrastructure. As Community Planning partners look at the way modern services are/will be delivered, the Council proposes to introduce a policy requiring all new developments to be connected for superfast broadband unless it is technically unfeasible. The Council will also continue to work with broadband infrastructure providers to advance solutions for areas which currently have no access to fibre broadband.

Water and Drainage

The Council works closely with Scottish Water to ensure planned growth can be accommodated within network capacity and to identify where infrastructure upgrades will be required. The capacities of the Waste Water Treatment Works is set out in the Infrastructure Topic paper.

Scottish Water is currently carrying out a strategic assessment of development capacity in Elgin and Forres and their surrounding areas. The modelling assessments will take into account the planned growth in these areas.

In some areas, connection to mains water supply remains a problem and the Council will continue to investigate whether potential solutions can be delivered in association with development proposed in the MLDP2020

Infrastructure co-ordination and funding.

The Council has set up an Infrastructure Delivery Group to co-ordinate future infrastructure provision and encourage good communication between Council services and infrastructure providers.

The Council has prepared Developer Obligations Supplementary Guidance which requires developers to financially contribute towards mitigating the impact their proposal will have on local infrastructure. Further information is available at www.moray.gov.uk/mainissuesreport

The current review of the Scottish planning system is investigating how infrastructure is funded in future, including the potential of introducing a local infrastructure levy. As part of the plan preparation process, the Council will test the viability of the Plan, which aims to cost out the infrastructure costs associated with the anticipated growth, assess how much is likely to be secured through developer obligations and what the resultant funding gap will be and how this will be addressed.

Q12 Are there opportunities for shared infrastructure provision such as neighbourhood "hubs"?

Q13 Are there additional infrastructure requirements which should be taken into account?



MAIN ISSUE 6 PRESSURES ON MORAY'S LANDSCAPE

Scottish Planning Policy seeks to support economically, environmentally and socially sustainable places by protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment.

Moray's outstanding natural and cultural environment is a key factor in the quality of life enjoyed by residents and visitors to Moray, which is a key element of the Moray 2026 vision. An important feature of Moray is the diversity of landscape, from mountains, moorland, forests, river valleys, coastal plains and foreshores/beaches.

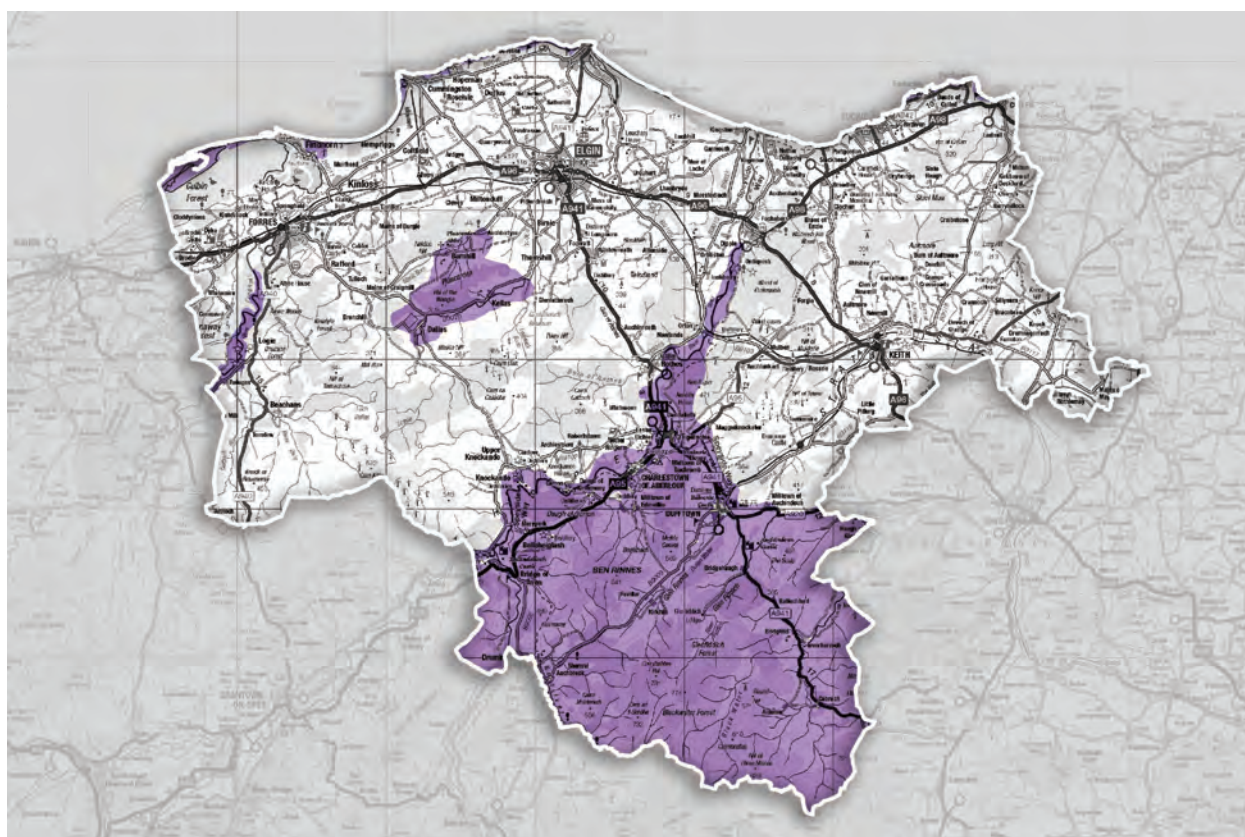
Moray's landscapes face pressure from a number of sources including large scale wind farms, solar arrays, the cumulative build up and suburbanisation of the countryside resulting from new housing developments, new high transmission pylon projects and the dualling of the A96 trunk road.

Safeguarding policies are set out in the current plan to restrict the types of development which take place in the Coastal Protection Zone (CPZ), Countryside Around Town (CAT) designations around the 5 main towns, Areas of Great Landscape Value (AGLV) and Gardens and Designed Landscapes. However, the AGLV designations are inconsistent with national guidance and need to be reviewed and better use needs to be made of the Scottish Natural Heritage Landscape Character Assessment of Moray and Nairn.

Options/ Alternatives

- Do nothing- Moray's landscape and cultural heritage will continue to be pressurised by renewable energy proposals and cumulative housing in the countryside with no established basis for the existing AGLV designation.
- Revise policies on Rural Housing and landscape designations. Review boundaries of designations, rename as Special Landscape Areas and incorporate guidance from the new Landscape Character Assessment.

Figure 1 - Areas of Great Landscape Value (AGLV)



Preferred option

While the CPZ, CAT and GDL policies are considered to work well, the AGLV's need to be reviewed as these are very broadbrush designations covering extensive parts of Moray which has limited the value of the designation and supporting policy. To conform with national guidance AGLV's will be renamed as Special Landscape Areas (SLA's).

Scottish Natural Heritage is finalising a revised Landscape Character Assessment (LCA) for Moray and Nairn. This offers the opportunity to review and revise the number and extent of SLA's and the policy basis to ensure the new Plan recognises and safeguards the special landscape qualities of Moray. The revised LCA is expected to be published in late 2017 and it is proposed to review the existing landscape designation and embed the LCA into the new policies of the Plan.

In terms of wind farm/ turbine developments, the Council has approved Onshore Wind Energy Policy Guidance and an up to date Landscape Capacity Study which concludes that there are limited opportunities for further large scale wind turbines in Moray. Moray already has significant number of wind farms operational, under construction or consented and is facing further pressure including extensions to existing wind farms with turbines over 150m to blade tip. Other pressures on our landscape are coming from upgrades to the grid infrastructure connections through Scotland and connecting the mainland to offshore renewable projects.

Woodlands and forest cover 33% of Moray and make a very important contribution to our quality of life, landscape, health, biodiversity, green infrastructure and reduce the impacts of climate change. Our woodlands need to be protected and carefully managed to deliver multiple benefits. The Scottish Government has ambitious targets for new woodland planting which the Council supports through the Moray Woodland and Forest Strategy, which identified opportunities for new woodland creation, including woodlands in and around towns.



Planning for forestry and woodlands cuts across several main issues, including Placemaking, Climate Change and Pressures on our Landscape, which underlines their importance. It is proposed to continue with the current policy requiring compensatory planting to mitigate loss of woodland cover and to embed the Moray Forest and Woodland Strategy into the new policies of the MLDP2020, including linkages between new urban developments and adjacent woodlands.

Q14. Do you agree that there is limited capacity for further large scale renewable energy projects in Moray's landscape.

Q15. Do you agree that the current Areas of Great landscape Value designations and policy need to be reviewed?

Q16. Do you support better integration between existing/ new green spaces and woodlands in and around towns?



MAIN ISSUE 7 SAFEGUARDING AND PROMOTING BIODIVERSITY

Scottish Planning Policy

The diversity of habitats and species in Moray reflects the high quality environment we enjoy. Moray has a significant number of international, national and local nature conservation designations and is home to some iconic species. These habitats and species are protected through well-established policies in the current LDP, which will be carried forward largely unchanged into the new LDP.

However, there is little evidence that the wider safeguarding and promotion of biodiversity in new developments, as required in the Placemaking policy of LDP2015, has been successful and it is proposed to address this in the MLDP2020.



Scotland's Biodiversity- a Route Map to 2020 identifies that Scotland's biodiversity is under pressure from the following 7 sources;

- Pollution
- Land use intensification and modification
- Spread of invasive species and wildlife disease
- Lack of recognition of the value of nature
- Disconnection with nature
- Climate change
- Marine exploitation

A number of priority projects have been identified in the Route Map including the restoration of peatlands, native woodlands and freshwaters, creating quality greenspace for health and education benefits, developing Scotland's natural health service and conservation of priority species.

Options/ Alternatives

- Continue as at present, with minimal policy backing to promote biodiversity.
- Strengthen policies on biodiversity and incorporate into Quality Audit process.

Preferred Option

The planning system can help to avoid and mitigate most of the above pressures to a varying extent and support the national priority projects through safeguarding policies and proactively embedding biodiversity planning for new developments and in particular through new green space provision. It is therefore proposed to include further, stronger policy guidance in the new Plan and Quality Auditing process, recognising the importance of the variety of our habitats and species and the need to safeguard what we have, to avoid/minimise habitat fragmentation and promote new habitat creation to support national projects and initiatives and deliver multi benefit greenspaces.

Since 1980 the number of pollinating insects in Scotland have declined by an estimated 51%, leading to fears of a negative impact on agriculture, food security, the economy and human health.

(Pollinator Strategy for Scotland 2017-2027)

Q17. How can the Local Development Plan and planning processes promote biodiversity better?



MAIN ISSUE 8 DELIVERING ON CLIMATE CHANGE

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Scottish Planning Policy

Climate Change was included as one of three primary policies in MLDP2015, but has not been effectively embedded or delivered through the current Plan. The current policy requires developers to complete a checklist demonstrating how their proposal contributes towards sustainable development in Moray, however this has commonly become a “tick-box” exercise as developers have continued to meet or slightly exceed Building Standards regulations and there has been no significant increase in the use of small scale renewables, sustainable construction techniques or use of local materials.

In Scotland the average temperature in the 2000's was 0.9 degree C warmer than the 1961-1990 average and warmer than any other decade since records began in 1910 and annual rainfall has increased by around 11% over the past century.

(Scottish Government, Draft Climate Change Plan, January 2017).

Options/ Alternatives

- Continue as at present with climate change referenced throughout policy chapters and developers required to submit a climate change checklist to demonstrate compliance with primary policy on climate change adaptation.
- Raise the bar and aspirations for climate change adaptation. New policy requirements to promote zero and low carbon technologies in new developments and sustainable design and construction techniques.



Preferred option

Consideration needs to be given to embedding climate change across the LDP, reflecting the cross cutting nature of addressing climate change. Most of the actions to address climate change can be accommodated in the new policies of MLDP2020 including use of passive solar gain, use of sustainable materials, flood prevention, planning for greenspaces, promoting sustainable transport options and sustainable urban drainage systems.

However, to make progress and further advances in climate change adaptation, it is proposed to promote zero and low carbon technologies in new developments. The Moray Local Plan 2008 included a carbon emission reduction policy related to delivering the required Building Standards emission reductions through the use of low and zero carbon technologies. Similar policies are now being introduced by other planning authorities and a draft policy is included in the Appendix.

There are opportunities to investigate developing district heat networks, although at the moment there is insufficient research to identify opportunities beyond phase 2 of the Elgin South Masterplan area. In the meantime it is proposed to use the Scottish Government Scotland Heat Map to screen sites and identify opportunities to use excess heat.

Q18 Do you support the introduction of a new policy promoting zero and low carbon technologies in new development?



MAIN ISSUES 9 RURAL HOUSING

Scottish Planning Policy aims to encourage policies which protect rural areas from the growth of unsustainable car based commuting and the suburbanisation of the countryside, seeking to direct most new development to locations within or adjacent to settlements.

The provision of high quality rural housing that is sensitively sited and designed and helps to provide a choice of housing options supports the vision set out in Moray 2026 to promote Moray as an area of diverse natural beauty where people choose to live, learn, work and enjoy.

Moray has experienced a significant level of housebuilding in the open countryside, particularly around Elgin, Forres and Buckie. As highlighted in the Growth Strategy section, the largely permissive current housing in the countryside policy has undermined the more sustainable option of directing growth to existing settlements, with the proliferation of consented rural housing plots proving a more attractive option to house buyers than sites within towns, villages and Rural Groupings. As well as cumulative hotspots of houses in the countryside and their impact upon landscape character, there is often a visual impact associated with poorly sited and designed houses, with the design often more appropriate to an urban setting than a rural one. In some parts of Moray the scale of cumulative build up has resulted in the landscape being changed so much that the rural environment can no longer be described as being of high quality.

In addition to the houses themselves, the gradual suburbanisation of the countryside effect is compounded by multiple surfaced access points, wheelie bin storage and unsympathetic landscaping.

Options/ Alternatives

- Continue with current housing in the countryside policy leading to cumulative build up issues, suburbanisation of the countryside and erosion of landscape character and quality.
- Promote a presumption against new housing in the open countryside in Moray.
- Promote a hierarchical approach to rural housing development, supported by stricter siting and design criteria.

Preferred option

Rather than let this unsustainable pattern of development continue, it is proposed to take a different approach to Rural Housing, to reinforce the Growth hierarchy, address the landscape and visual concerns around cumulative build up of housing in the countryside and raise the standards of rural design. This involves a new policy approach which is set out in Appendix A, merging the previous housing in the countryside policies into a single Rural Housing policy which seeks to;

- Restrict opportunities for new rural housing in identified hotspots and direct development to Rural Groupings, followed by the re-use and replacement of traditional stone and slate buildings in the countryside and lastly to the open countryside .
- Identifying more Rural Groupings with development opportunities. There are presently 80 Rural Groupings and it is proposed to identify 10 more.
- New siting and design criteria, directing development to the least environmentally sensitive areas, ensuring better integration in the landscape, reduce scale of buildings, more traditional form and proportions, avoiding excessive glazing and better choice and application of materials.



This approach will promote a more sustainable pattern of growth and seek to limit the suburbanisation of the countryside. The siting criteria are intended to ensure that sites have appropriate backdrop and enclosure to provide containment and ensure new houses can fit sensitively into the landscape. The design criteria promotes simple traditional forms of housing with a palette of appropriate materials and the avoidance of excessive detailing.



Q19 Do you agree that the cumulative build-up of housing in the countryside is having an adverse effect on landscape character and quality?



Q20 Do you agree with the proposed approach, including identifying more Rural Groupings with housebuilding opportunities within them?



Q21 Do you agree with the aim of improving design standards in rural areas?



LHMA	City/Town/ village	Proposed additional housing land requirement	Proposed additional employment land requirement
Elgin LHMA		1200 units	23ha
	Elgin	1120 + LONG	
	Burghead	New LONG site proposed.	
	Duffus	0	
	Fochabers	50	
	Garmouth/ Kingston	10	
	Hopeman	0	
	Lhanbryde	0	
	Lossiemouth	0	
	Mosstodloch	10	
	Cunninghamston	0	
	Urquhart	10	
Buckie LHMA		250 units	Identify Strategic Reserve
	Buckie	250 units + LONG	
	Cullen	0	
	Findochty	0	
	Portgordon	0	
	Portknockie	0	
Forres LHMA		250 units	12ha
	Forres	250 + LONG	
	Alves	0	
	Dallas	0	
	Dyke	0	
	Findhorn	0	
	Kinloss	0	
	Rafford	0	
Keith LHMA		0	3.5ha
	Keith	New LONG proposed	
	Newmill	0	
	Rothiemay	0	
Speyside LHMA		0	4.8ha
	Aberlour	0	
	Archiestown	0	
	Craigellachie	0	
	Dufftown	0	
	Rothies	0	





