



Strategic Environmental Assessment (SEA)

Proposed Moray Local Development Plan

June 2019

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Summary

The Environmental Assessment (Scotland) Act 2005 requires a Strategic Environmental Assessment (SEA) to be undertaken for all plans, policies, and strategies, which are likely to raise significant environmental impacts. The Assessment involves various stages including production of an Environmental Report.

This Environmental Report assesses the Proposed Moray Local Development Plan 2020 and follows on from the draft SEA prepared for the Main Issues Report published for consultation in January 2018.

The Assessment process for the Main Issues Report consisted of “scoping” the main issues, settlement statements, policies, and individual preferred development sites and any “real” alternatives against a set of 12 environmental objectives to identify whether there are likely to be significant environmental impacts. This has now been updated to include the final suite of policies and final proposed settlement designations set out in the Proposed Plan.

If an issue, settlement, policy or site was not considered to have a likely significant environmental impact they were “scoped out” of further assessment and the reasons for doing so are indicated in the report.

The Assessment is informed by highlighting what the main environmental issues affecting Moray are, a detailed analysis of background statistics, consideration of consultation responses from Scottish Natural Heritage, SEPA, Historic Environment Scotland, and other consultees. This Report also identifies the many other sources of legislation, guidance and policies that are relevant to the preparation of the Proposed Plan and supplementary planning guidance.

The Assessment itself consisted of planning officers considering the 13 objectives, with a series of prompting questions, to complete a matrix showing the magnitude of effect of any likely environmental effects. The assessment process was informed by

technical consultations carried out as part of the Local Development Plan preparation process, which involved planning officers completing summary site checklists and concluding whether a site was likely to have a significant environmental effect and whether it should be scoped in or out of detailed assessment in the SEA. Checklists were done for all sites officers investigated in detail and sites which offered “real” alternatives. However, “real” alternatives in a Moray context are limited and most “alternatives” put forward through the Call for Sites process are at odds with the preferred spatial strategy. A new suite of draft policies has been prepared reducing the current 72 policies down to 32 and these have been subject to assessment.

If a Main Issue, policy or site is identified as having a likely significant impact then appropriate safeguarding and mitigation measures have been identified and any changes required to the Proposed Plan have been highlighted.

The process and methodology adopted are summarised in **Appendix 1 - SEA Methodology**.

This Environmental Report, the Main Issues Report, Proposed Plan and all supporting documents are available online at www.moray.gov.uk/proposedplan and paper copies of the Proposed Plan are available at Council Access Points and libraries.

1. Introduction

Moray Council is preparing the Moray Local Development Plan (LDP) 2020 under the terms of the Planning (Scotland) Act 2006, which will replace the Moray LDP 2015. The LDP will cover the whole of the Moray Council administrative area, excluding the Cairngorms National Park.

The purpose of the LDP is to provide a land use planning policy framework to guide future development and be used to determine planning applications. The LDP will include a strategic “vision” for Moray, forecasts for new housing, industrial and commercial requirements, with site designations made to meet these requirements. The LDP will also contain policies aimed at considering development proposals while protecting the built and natural environment resources of Moray.

The LDP will conform to the National Planning Framework 3, Scottish Planning Policy, Circulars and Planning Advice Notes and at a local level will support the Moray Local Outcomes Improvement Plan.

The first stage in the preparation of the LDP is the production of a Main Issues Report, which considers options and alternatives and identifies the main issues to be addressed. The Main Issues Report was the subject of extensive public and stakeholder consultation, followed by the production of the Proposed Plan, which contains more detail and will also be subject to further public and stakeholder

consultation. Objections can be lodged at this stage and any unresolved objections will be subject to consideration at an Examination. Following Examination, modifications may be published.

The LDP preparation is therefore subject to change at various stages, as a result of consultations, objections and modifications. The Environmental Report prepared at the Main Issues stage aimed to consider options/ alternatives at a strategic level, consider main issues identified and potential environmental impacts from settlement statements and policy groupings.

The SEA Environmental Report also covers Supplementary Guidance to the Proposed Plan.

The Proposed Plan consists of 5 volumes;

- Volume 1- vision, spatial strategy, strategic context and policies
- Volume 2- settlement statements
- Volume 3- Rural Groupings
- Volume 4-Action Programme
- Volume 5- Supplementary Guidance

Comments on this Environmental Report should be submitted by e-mail and sent to:

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2. Requirement for Strategic Environmental Assessment

The EC Directive 2001/42/EC requires a Strategic Environmental Assessment to be carried out on Development Plan documents and supplementary planning guidance. The aim of the Directive is to provide for a high level of protection to the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promote sustainable development. The EC Directive was implemented in Scotland through the Environmental Assessment (Scotland) Act 2005.

3. Strategic Environmental Assessment Process

SEA is a systematic method for considering the likely environmental effects of certain plans, programmes and strategies (PPS). To ensure that environmental factors are given the same consideration as social and economic factors, SEA aims to:

- integrate environmental factors into PPS preparation, decision making, and adoption processes, thus improving PPS and enhancing environmental protection
- promote early dialogue with consultees, particularly those with environmental expertise, but also the wider public thus increasing public participation in the decision making process
- promote full and objective consideration of alternatives to ensure that the best environmental options are identified and taken on boards as far as possible; and
- facilitate openness and transparency of decision making, through the publication of the post-adoption SEA statement

SEA is required by the Environmental Assessment (Scotland) Act 2005. The key SEA stages are:

Table 1: Key stages of the SEA

Screening	Determining whether the PPS is likely to have significant environmental effects and whether an SEA is required
Scoping	Deciding on the scope and level of detail of the Environmental Report, and the consultation period for the report, done in consultation with Scottish Natural Heritage, Scottish Ministers (Historic Environment Scotland) and the Scottish Environmental Protection Agency
Environmental Report	Publishing an Environmental Report on the PPS and its environmental effects and consult on the report
Adoption	Providing information on; the adopted PPS, how the consultation comments are taken into account, methods for monitoring the significant environmental effects of the implementation of the PPS
Monitoring	Monitoring significant environmental effects in such a manner as to enable Responsible Authorities to identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action

The purpose of this Environmental Report is to:

- provide information on the Key Environmental Issues in the Main Issues Report and Proposed Plan, as well as supplementary planning guidance;
- identify, describe and evaluate the likely significant effects of the Plan and its reasonable alternatives;
- provide an opportunity for the Consultation Authorities and the public to offer views on any aspect of this Environmental Report

Planning Advice Note (PAN) 1/2010 Strategic Environmental Assessment of Development Plans, published in March 2010 sets out guidance for planning authorities to help to focus and streamline the process. The PAN identifies three key

principles to be followed and the Council has based the SEA process upon these as well as past experience.

The three key principles are;

- **Integration** - the SEA should form an integral part of the Key Environmental Issues preparation process and not duplicate work undertaken and explore opportunities for efficiency. The checklists produced to inform the Main Issues Report are an example of this, as they summarise key environmental issues and informed the Council's choices.
- **Proportionality** - SEA should be streamlined and fit for purpose, clear and succinct, focussing on significant environmental effects.
- **Efficiency** - reduce duplication and complexity within the process.

4. Key Facts

The key facts relating to the Key Environmental Issues are set out in the table below.

Table 2: Key Facts

Name of Responsible Authority	Moray Council
Title of PPS	Key Environmental Issues
Purpose of PPS	Statutory Proposed Moray Local Development Plan 2020- sets out main land use planning issues facing Moray, spatial strategy and alternatives.
What Prompted the PPS	Statutory requirement to replace the existing Local Development Plan within 5 years,
Subject	Land use planning.
Period covered by PPS	2020-2025 with longer term land use proposals
Frequency of updates	Every five years, although national planning review is considering changing to a 10 year cycle.
Area covered by PPS	Moray Council administrative area excluding the Cairngorms National Park administrative area falling within Moray.
Summary of nature/content of PPS	Identified proposed vision and spatial strategy for Moray and 9 main land use planning issues and the proposals to address those issues.
Contact	Gary Templeton Principal Planning Officer Development Plans The Moray Council, Council Office, High Street, Elgin, Moray, IV30 1BX E-mail: localdevelopmentplan@moray.gov.uk Tel: 01343 563470

5. Changes arising from SEA process

The table below summarises the key changes arising from the Assessment process, identifying where there is likely to be a significant environmental effect, changes required to address, mitigate or offset the effect, and concluding comments.

The Environment report has highlighted very few changes arising from the SEA process as most changes have come out of the site checklist, associated consultation and evolved as the Plan has been developed with key stakeholders.

The changes identified below in table 3 were flagged up at MIR stage.

Policy/ Site	Change arising
FR2 and FR17- Waterford, Forres	Need to highlight potential need for safe crossing of the A96.
Policy EP2 Landscape Designations	Reference may be required to control of hill tracks, however, this is dependent upon guidance set out in the Landscape Character Assessment, which is expected to be published in 2018.
EP3 Forestry and Agriculture	Policy should include a cross reference to EP1 and compensatory planting.
EP5 Historic Environment	Policy should be revised to include clearer guidance on other locally important assets.
PP3 Infrastructure and Services	Need to consider reference to early provision of infrastructure to ensure new residents have access to services and avoid isolation issues.

Table 3- changes arising from SEA. at MIR stage,

However, taking into account further engagement and consultation on policies, the suite of policies have changed with draft Policy EP3 split into DP1 Development Principles, which covers the prime agricultural land issue and EP7 Forestry, Woodlands and Trees, which covers the compensatory planting issue in the above table.

The comment in the table above regarding EP5 has been superseded by HES requesting that the policy be split as per existing MLDP2015, which has been addressed in the new suite of policies.

The comment on PP3 has been addressed to some extent, for example requiring earlier provision of play areas and will be followed up as an operational issue when dealing with developer obligations and planning conditions regarding provision of infrastructure.

The table below identifies further changes arising from SEA and evaluation of sites/ policies between MIR and Proposed Plan stages.

Policy/ Site	Change arising
Various	A number of small sites have been deleted from the Plan as a result of the

	Control of Woodland Removal Policy.
Policy DP11 Gypsy/ Travellers/ Travelling Showpeople.	Additional safeguarding added by including a cross reference to all other policies in this policy.
Easter NewForres	Additional wording added regarding need for landscape integration study to inform Development Framework and for visualisations from key viewpoints.
Waterford, Forres	Text added requiring further consideration of a safe crossing of the A96 when development proposals come forward which would increase active travel use of this connection.

Table 4- Changes arising from Proposed Plan stage

6. SEA consultation authorities responses to Scoping and to draft SEA

Appendix 7 sets out the consultation authorities responses to Scoping, Appendix 8 sets out consultation authorities responses to the draft Environmental Report and Appendix 10 sets out the consultation responses at Proposed Plan stages.

7. Vision

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.

The Vision

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 and supports sustainable economic growth (including the tourism economy).
- * Identify and provide for new or upgraded 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 built environment to climate change.

Assessment of Vision

The vision statement is considered to be significantly positive when considered against the 13 SEA objectives. The vision recognises the importance of Moray's high quality environment, which must be balanced with the need to provide land for development purposes. The vision further recognises the need to protect the built and natural environment, climate change challenges and promoting low carbon and sustainable development.

It is therefore concluded that the vision strongly supports the 13 objectives.

8. Key Environmental Issues

Moray benefits from a very diverse, high quality environment, with much of the land in open moorland, woodland and agricultural use. The quality of the environment is reflected in the range and number of international, national and local natural and historic heritage designations.

The population is concentrated in 5 main towns, with a scattering of smaller towns and villages, primarily along the Moray coast and through the Spey valley. To support the LDP a State of the Environment report has been prepared.

Employment opportunities are concentrated in the five main towns and at Kinloss Barracks and RAF Lossiemouth. The rural nature of Moray means that there is a heavy reliance upon private car usage.

Many of the more "urban" environmental problems experienced by other local authorities, such as high density substandard housing and large areas of vacant and derelict land, are not significant problems in Moray.

The significant environmental issues considered relevant to preparation of the LDP are:-

Flooding and Surface Water Management

Moray has a history of serious flooding incidents, particularly affecting Elgin, Forres, Rothes, Garmouth and Kingston. Flood Alleviation Schemes have been completed for Elgin, Forres (Burn of Mosset), Forres (River Findhorn & Pilmuir), Lhanbryde, Newmill and Rothes. A Flood Alleviation Scheme is currently under construction for Dallas.

Surface water flooding is experienced throughout Moray and the Council, SEPA and Scottish Water are developing Surface Water Management Plans with the objective, by 2027, to:-

- Reduce the number of properties at risk from surface water flooding;
- Reduce the annual average damage caused by surface water flooding; and
- Maximise the number of people registered with Floodline.

Surface Water Management Plans, implementing options for the management of surface water flood risk, are being developed for Aberlour & Rothes, Buckie, Elgin, Forres and Keith.

Development pressure on flood plains continues and the Council has worked closely with SEPA in determining planning applications where flooding may be an issue.

Implications for LDP:-

- Need to review policy on Development Proposals in Flood Risk Areas;
- Need to reflect Flood Alleviation Schemes within settlement statements;
- Need to review designations in light of latest flood risk data and areas safeguarded through Alleviation Schemes; and
- Promote green corridors and environmental improvement opportunities in association with Flood Alleviation Schemes.

Coastal Erosion

The National Coastal Change Assessment (NCCA), commissioned by the Scottish Government, was published in August 2017. Aimed at informing strategic planning, the NCCA establishes historic coastal change and compares it to both 1970s and current coastal positions to determine past erosion/accretion rates.

Since the 1970s, the NCCA states that “12% of the soft coast length across Scotland has retreated landwards (erosion), 11% has advanced seawards (accretion) and 77% stable or has shown insignificant change”.

Moray’s coast falls within Cell 3: Cairnbulg Point to Duncansby Head, which has seen a substantial increase in the rate of erosion with the fastest rates affecting 11% of the retreating shore. Accretion rates remain the same with 9% of the advancing shore now affected.

Combined threats by the River Spey and Spey Bay have seen erosion becoming more common in the Moray Firth and “given the energetic nature of the bay and river, it is likely that the dynamism will continue for the foreseeable future”.

Implications for LDP:-

- Need to review coastal designations to take account of projected coastal erosion; and
- Need to review policies to ensure coastal erosion issues are embedded in policy.

Design Standards in New Development

Modern suburban housing styles are considered to be relatively uniform and have resulted in a number of areas lacking in any real character and identity, often poorly connected to adjacent areas and lacking in quality open spaces.

The Council has produced Urban Design Supplementary Guidance as a result of the Scottish Government publications, Designing Streets and Creating Places. The Guidance aims to improve design quality in new developments and promote better joined up solutions between engineers, planners and designers.

Implications for LDP:-

- Need to refer to Moray’s Urban Design Supplementary Guide and Scottish Government’s Creating Places and Designing Streets in the LDP;
- Need to consider how site designations can promote higher design standards; and
- Need to consider linkages between sites and take a more strategic and multi-disciplinary approach to designations

Open Spaces

Associated with the problem of poor design standards in new development, the provision of new open spaces are often poorly located, lack surveillance and use leftover areas of land. Open Spaces act as wildlife corridors and green networks for pedestrians and cyclists and it is important that they are safeguarded and connected. The Council has developed a Open Space Strategy Supplementary Guidance, which will inform the LDP.

Implications for LDP:-

- Review existing Open Space policies and consider case for a minimum provision requirement;
- Consider results of Open Space audit and identify potential surplus/ deficits of open spaces; and
- Ensure that new open spaces meet the guidance set out in the Urban Design Supplementary Guide and Open Space Strategy Supplementary Guidance.

Impacts on Landscape

There are limited opportunities for brownfield land developments in Moray's towns and villages. Previous Local Plans have relied heavily upon large new Greenfield housing land designations to meet strategic housing land requirements.

While the scale of Greenfield land releases is likely to be less, there could still be significant environmental issues arising. New developments, usually on the edge of towns can often fail to integrate sensitively into the landscape, leaving stark, modern, poorly landscaped developments, which appear out of character with their surroundings.

In developing the LDP, the Council commissioned a landscape study on any bid sites identified from the Call for Sites as requiring landscape input to integrate into the landscape.

Since 2011, housing completion rates have fallen significantly below the Housing Need and Demand Assessment figure annual requirement of 538 units. This trend is expected to continue for the next five year effective housing land period. The Housing Land Audit 2017 identifies that there is a 24.4 year Established Land Supply in Moray.

Pressure for development in the countryside and poor design quality of new rural housing has been an ongoing challenge for Moray Council. Supporting new housing in the countryside is part of the Council's strategy for supporting rural areas. Inappropriately sited and designed new housing erodes the character of rural areas.

Revised design guidance is provided in the Rural Housing policy with the aim of improving siting and design standards.

Consent has been granted for large scale wind farms at Berry Burn, Dorenell, Edintore, Hill of Glaschyle, Hill of Towie, Kellas, Meikle Hill, Rothes and Paul's Hill. Dorenell and Hill of Towie (Drummuir) were approved on appeal, following Public Local Inquiries, by the Scottish Government. Other wind farm proposals are at various stages in the planning process. Pressure continues for larger more powerful turbines in Moray's countryside which could have a significant visual and landscape effect.

Further pressure on Moray's landscape comes from infrastructure projects, including new powerlines and the dualling of the A96. However, these projects fall outwith the scope of the LDP and this Assessment.

Implications for LDP:-

- Commission updated study to consider "new" sites, if required;
- Ensure findings from previous studies are reflected in site designations.
- Need to review effectiveness of housing in the countryside policies and refer to the Housing in the Countryside Supplementary Guidance;
- Review Moray Onshore Wind Energy Policy Guidance;
- Update policies to ensure conformity with Scottish Planning Policy; and
- Provide a clear policy framework for considering smaller scale wind farm proposals.
- Need to monitor impact of new development on prime agricultural land.

Land requirements- demand for greenfield sites---Shortage of Affordable Housing

The need and demand for housing has been updated in the Housing Need and Demand Assessment 2017. The need for affordable housing is being addressed by a programme of affordable housing investment. The nature of housing demand has changed as household sizes decrease, resulting in more demand for flats, small terraced homes and semi-detached homes. However, demand for housing land remains strong and further land releases will be required and with limited brownfield opportunities available, further greenfield releases will be required, although these releases will predominantly be through release of existing LONG designations

While the option of a new town may need to be investigated at some point in the future, the existing land supply suggest that this is not required within the period of the Moray Local Development Plan's housing supply forecasting up to 2035. However, it is proposed to identify this as an action for early research, given the planning timeframes required for such provision.

Implications for LDP:-

- Housing Land Requirements to be informed by Housing Need and Demand Assessment;
- Site designations may specify detailed affordable housing requirements; and
- Density levels may have to increase.
- Consider longer term requirement for a new town in Moray.

Defence Dependent Economy

Following uncertainty over the future of RAF Lossiemouth and Kinloss Barracks during 2016, the government announced the intention to safeguard the future of Kinloss Barracks, which, along with the decision to relocate approximately 450 additional personnel to RAF Lossiemouth to support the new Poseidon maritime patrol aircraft, was very positive news for the Moray economy. The defence presence in Moray contributes significantly to the Moray economy in terms of local spend, housing market and attracting tourism. While there are environmental issues arising from operation of two military bases within Moray, these are outwith the control of the Local Development Plan. Noise contours and the associated policy framework will be reviewed as part of the Proposed Plan stage.

However, there remains a need to diversify Moray's economy from being defence dependent. This requires effective land to be available to support the growth of existing businesses and land available to attract inward investment. Additional effective employment land in Elgin and Forres is urgently required to meet demand and these could be significant sized sites. The Council is also considering identifying large rural sites as potential inward investment sites.

In terms of the environment, issues would include:-

- The scale of new employment sites and their potential adverse landscape impact; and

- Proximity to watercourses.

Implications for LDP:-

- The future use of RAF Lossiemouth and Kinloss Barracks will have a significant influence on future housing, population and migration forecasting and therefore influence housing land requirements, school rolls, retail, commercial and industrial land requirements.

Elgin Transportation Network

Elgin experiences traffic congestion along the A96 trunk road and within the local road network, principally from New Elgin, to connect to the A96. The LDP 2015 identified a series of local road improvements for Elgin.

The traffic congestion experienced within the city creates localised air pollution issues. On a wider scale, the congestion adds to the delays experienced while travelling along the A96.

The Council published its Second Local Transport Strategy in May 2011 to help plan for improved transport infrastructure and services in the area. This has been supplemented by the Elgin Transport Strategy, which has a long term horizon to 2030 and runs parallel to the LDP 2015. The Strategy aims to provide for growth and create the appropriate infrastructure, whilst encouraging as much mode shift to walking/cycling as can be feasibly achieved.

Implications for LDP:-

- Plan to reflect the Elgin Transport Strategy and Second Local Transport Strategy and promote sustainable transport.
- Some additional traffic modelling work is required to cover the time period of growth to 2035.

A96 Dualling: Inverness to Aberdeen

The Scottish Government has announced its intention to dual the A96 by 2030. Route options are currently being investigated for the section from Hardmuir to Fochabers and a preferred option is likely to be consulted upon during the second half of 2018. While the dualling of the route will have significant benefits in terms of reducing travel times and improving safety, in terms of the environment, issues would include:-

- Potential adverse impact upon the environment;
- Potential run-off issues into watercourses; and
- Potential adverse impact upon designated nature conservation and historic environment sites.
- Potential economic benefits.

Implications for LDP:-

- Potential to support employment sites.
- Potential to conflict with future land designations.

Other Environmental Issues

There are many other environmental issues to be considered in the LDP, however, these are not considered to be significant. The LDP will provide a policy framework for these issues and consider them when identifying site designations. This includes issues such as:-

- Biodiversity - safeguarding international, national and local natural heritage designations from inappropriate developments. This will be addressed through safeguarding policies, which will be subject to assessment and through consultation with SNH and SEPA. The Council are looking at embedding biodiversity requirements into policy, design briefs and Masterplans.
- Cultural Heritage - safeguarding listed buildings, scheduled ancient monuments and archaeological sites will be controlled through policies, which will be subject to assessment and consultation with Historic Environment Scotland. Moray currently has two Conservation Area Regeneration Schemes (CARS) in Elgin and Keith and the Council have published Conservation Area Appraisals for Cullen, Elgin, Findhorn, Forres and Keith.
- Woodlands - Moray benefits from extensive coverage of the land area in woodlands, contributing to climate change targets and providing a range of economic, social and environmental benefits. Development pressure for tourist accommodation and housing in the countryside must be controlled through policies to ensure Moray's woodlands are retained and potentially expanded. The Council are approved a Moray Forestry & Woodland Strategy which identifies the key issues affecting forestry in Moray, highlights the opportunities that exist across the sector, increases the profile of current activities and guides woodland creation to appropriate locations over the next 20 years.
- Soil stripping and/or drainage of infrastructure development (e.g. windfarms in upland areas).
- Issues relating to the water environment, such as water quality, quantity and physical pressures.
- Increasing demand for resources such as water and waste water treatment, heat and energy, and waste management is a potential issue created by new built development.
- Ensuring that new development connects to the public sewer or promoting first time public sewerage infrastructure in areas where it is currently absent this should be included in the other environmental issues section

9. Alternatives / Options

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 operational issues associated with RAF Lossiemouth. Further large scale development beyond currently designated/ consented sites is unlikely given the constraints of environmental designations and limitations on the type of development possible in proximity to RAF Lossiemouth.
- Growth of Keith is significantly slower than in Buckie and Forres.
- Growth in Forres has slowed due to the change from RAF Kinloss to Kinloss Barracks, with 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 have a number of existing undeveloped housing sites already designated. Aberlour has a health centre, Fochabers plans a replacement health centre and both towns have a good range of local shops/ services.
- 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 and consideration of alternatives

The first option was 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 second option on its own would likely have a significant environmental effect on some communities and while bids have been submitted for large scale expansion of towns and villages such as Duffus, Hopeman and Kinloss, these are all considered to adversely impact upon the local character of these settlements and are not supported. Expansion in other towns is restricted due to topography and environmental issues such as at Lossiemouth, while growth in towns such as Keith, Aberlour and Dufftown is much slower and there is an existing supply of land for housing available.

Fochabers and Aberlour enjoy a good range of services, a key role as local service centres, with both primary and secondary schools. It is therefore proposed to recognise and promote their roles within the spatial strategy. In Fochabers it is proposed to identify a site for a new health centre and bring forward an existing LONG designation, while in Aberlour, the focus will be on working to overcome constraints on existing sites and deliver much needed housing.

The option for a new town is a direct reasonable alternative to further large scale expansion of Elgin and Forres. However, this is not considered as sustainable an option as expansion of Elgin and Forres at this time, while there is a considerable effective housing land supply and infrastructure has been planned to support the level of growth envisaged to 2035.

A new town would inevitably have a significant impact upon the landscape in the short term, is likely to have a significant impact upon prime agricultural land and require significant new infrastructure and services, which could adversely affect existing schools and retail facilities and increase car usage. While it is recognised that new growth areas in both Elgin and Forres can be considered to be some distance from their respective town centres, they are or will be linked through good walking and cycling connections and through public transport services. The MLDP2020 proposes significant new areas of employment land in Elgin, Forres and Buckie and it is important that housing growth is provided to support these sites. It is also vital that housing is delivered to meet demand and the most significant demand both affordable and market housing is in Elgin, Forres and Buckie. Failure to meet this need would significantly increase car movement as would a new town without the necessary infrastructure and employment areas. A new town also takes a considerable time to establish and while the Council has a significantly higher backlog need for affordable housing between 2018 to 2023, this is considered a longer term option for further consideration.

While there may be a requirement for a new town in the much longer term, expansion opportunities are available in both Elgin and Forres for the foreseeable future by bringing forward already designated LONG sites in most instances and this is considered the most sustainable option, continuing the longer term planning which the Council won a Scottish planning award for. However, the key to expansion of Elgin and Forres will be delivering quality places, which are well connected and minimise use of the car, with good access to local facilities, which will require a re-evaluation of when public transport provision is secured, to avoid the elderly and vulnerable members of society feeling isolated.

The preferred Growth Strategy is therefore a mix of the first two options, focussing new development in the primary growth centre of Elgin and to a lesser, 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 significant 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.

Growth Areas

LDP2020	
Primary Growth Area	Elgin
Secondary Growth Area	Forres, Buckie
Tertiary Growth Area	Lossiemouth, Keith, Fochabers, Aberlour
Smaller towns & villages	Alves, Archiestown, Burghead, Craigellachie, Cullen, Cummingston, Dallas, Dufftown, Dyke, Findhorn, Findochty, Garmouth, Hopeman, Kingston, Kinloss, Lhanbryde, Mosstodloch, Newmill, Portgordon, Portknockie, Rafford, Rothes, Rothiemay, Urquhart
Rural Groupings	

Alternative to preparing MLDP2020

The preparation of a LDP for Moray is a statutory requirement so there is no alternative other than to prepare one. If a LDP was not prepared, or its preparation delayed, then the current LDP would become out of date and ineffective in providing a plan led system. Land uses would be determined on an ad hoc basis and driven by market forces leading to an unplanned and potentially chaotic and unsustainable settlement pattern.

An unplanned approach could have significant adverse environmental impacts with a lower quality of life for local residents. Greater development pressure could be exerted upon natural and cultural heritage assets and infrastructure, with the potential for increased pollution and greater dereliction as brownfield sites remain undeveloped.

10. Scoping Potential Development Sites

The Council issued an informal Call for Sites in late 2016 and a further Call for Sites in June 2017. All bid sites received have been visited by a Planning Officer and have a site checklist completed which contains a range of environmental criteria. Sites

considered for inclusion in the LDP have been subject to consultation with Scottish Natural Heritage, Scottish Water, Historic Environment Scotland, the Regional Archaeologist, Transport Scotland, SEPA and Council services including Transportation, Contaminated Land, Environmental Health and Lands and Parks.

In terms of the SEA process, it is considered inappropriate to consider each and every site against a range of SEA objectives and criteria. Sites have been considered against the spatial strategy and a range of detailed criteria. In Moray there are limited real alternatives as most alternatives are contrary to the spatial strategy as discussed earlier. The site checklists and consultation process effectively act as a Screening exercise to exclude sites which are considered unsuitable or less desirable for a range of planning related reasons.

Existing designations which are to be “carried over” into the new LDP will not be subjected to SEA unless there are significant new issues affecting the designation. Otherwise it is assumed that the site has been subject to assessment through the previous SEA and any mitigation already taken account of.

It is also proposed that the detailed Environmental Assessment focuses in on those sites where there are likely to be significant environmental effects. Many of the settlements will have no new designations or very small scale proposals. These are generally not going to raise any significant environmental concerns. Tables at Appendix 3 (existing designations) and Appendix 4 (settlement bid sites) list all the sites within the LDP area and indicate whether they will be scoped in or out of the Assessment. This does not cover Rural Groupings, which are generally not considered likely to raise significant environmental effects and were recently reviewed and subject to separate SEA. However, a number of new Rural Groupings are proposed and these have been considered in the assessment of the new Rural Housing policy. If any new and significant environmental issues arise in any of the rural groupings during preparation of the LDP, then the rural grouping will be scoped back into the assessment process and considered in the final Environmental Report to accompany the Proposed Plan.

Some of the land use designations may have an effect upon Natura interests, and have been subject of a separate Habitats Regulation Appraisal.

11. Scoping SEA Objectives

The range of issues covered by the policies and proposals of the LDP is extensive and the table below identifies that all SEA objectives will be scoped in to the Assessment process.

Environmental Objective	Aims of Objective	Scoped In/Out	Justification
1. Improve Air Quality	<ul style="list-style-type: none"> ● To protect and enhance the quality of local air quality in Moray and to ensure that emissions are below National Air Quality Standards and thus air quality objectives are met 	In	Plan will include policies and proposals to address air quality issues, such as Elgin road network improvement issues.
2. Reduce the causes and impacts of climate change	<ul style="list-style-type: none"> * To reduce pollution * To promote sustainable use of resources * To reduce the risk of flooding 	In	Plan will include a range of policies and proposals addressing climate change issues including flooding, recycling, renewable energy.
3. Increase energy efficiency and proportion of energy generated from renewable sources	<ul style="list-style-type: none"> ● To improve energy efficiency in buildings ● To promote renewable energy generation 	In	Plan will include policies promoting renewable energy in appropriate locations.

4. Protect and enhance the biodiversity and landscape	<ul style="list-style-type: none"> • To protect natural environment with particular emphasis on protected sites and species (Local, National and European) and to conserve the existing environment through enhancement schemes, mitigation and compensatory measures where necessary • To promote people's enjoyment, understanding and appreciation of the natural heritage need for its protection 	In	Plan will include policies to protect designated natural heritage and landscape sites and the wider biodiversity.
5. Protect and enhance the cultural heritage and diversity	<ul style="list-style-type: none"> • To protect and, where appropriate, enhance the historic environment 	In	Plan will include policies to protect and enhance listed buildings, conservation areas, archaeological sites and scheduled ancient monuments.

<p>6. Protect and enhance the quality of the districts ground, river and sea water systems</p>	<ul style="list-style-type: none"> • To protect watercourse from pollution • To protect and enhance the quality of the water environment within Moray including surface and groundwater features in addition to the North Sea coastline and the protected marine environment of the Moray Firth SAC. Areas designated as floodplains should be maintained to ensure floodwater attenuation is not affected 	<p>In</p>	<p>Plan will include policies to protect watercourses and control pollution.</p>
<p>7. Improve soil quality and use soil in a sustainable manner</p>	<ul style="list-style-type: none"> • To protect and enhance the quality of the ground environment and promote the sustainable use of local materials and brownfield sites. 	<p>In</p>	<p>Plan will include a policy to safeguard prime agricultural land.</p>
<p>8. Reduce the amount of waste produced and increase the amount of recycling</p>	<ul style="list-style-type: none"> • To reduce waste produced, increase recycling and raise awareness of waste management. 	<p>In</p>	<p>Plan will include a policy on recycling provision in new developments.</p>

<p>9. Promote the use of sustainable transport</p>	<ul style="list-style-type: none"> • Promote accessibility, health, and prosperity and quality of life benefits through an integrated and enhanced local transport strategy through sustainable development. • To contribute to a sustainable transport infrastructure to reduce emissions from road and rail, helping to achieve National Targets for reduction in greenhouse gas emissions. Infrastructure proposals should be mindful of the effects of climate change on the network e.g. flooding, landslides etc. • To improve, integrate and enhance the local transport network in Moray to benefit the economy of Moray whilst maintaining sustainable principles. 	<p>In</p>	<p>Plan will include policies and proposals relating to use of sustainable transport.</p>
<p>10. Ensure prudent use of natural resources</p>	<ul style="list-style-type: none"> • To protect and, where appropriate, enhance the landscape and visual amenity of Moray • To safeguard and use natural resources sustainably 	<p>In</p>	<p>Plan will include policies relating to prime agricultural land, minerals, forestry.</p>

11. Protect, enhance and create green spaces and to regenerate degraded environments	<ul style="list-style-type: none"> To protect existing open spaces, create high quality green and open spaces and link them to existing open/green spaces. 	In	Plan will protect ENV designations and aim to create green corridors and improve derelict land.
12. To secure a better quality of life for local people, through improvements to service provision, sustain a healthy economy with high levels of employment and improve the health and wellbeing of local people	<ul style="list-style-type: none"> To protect and enhance the quality of life of Moray communities and visitors through employment and housing provision, good infrastructure, health and recreational opportunities 	In	Plan will include proposals for new industrial, housing and commercial developments, creating future housing and employment opportunities. Protection and creation of a high quality environment, provides opportunities for recreation.
13. To promote the sustainable use and management of material assets.	<ul style="list-style-type: none"> Has infrastructure been planned to support this PPS? Including WWTW, Transportation, Education, health. 	In	Plan will include proposals for new infrastructure and align new development with new infrastructure requirements.

Table 5: Scoping SEA Objectives In/Out

12.Scoping Policies

Following a review of policies of the LDP 2015, the number of policies has been reduced from 72 to 32. The table below identifies whether the policies will be scoped in or out for further detailed assessment. Some of the policies are an amalgamation of existing policies which have undergone SEA and could be scoped out as no material issues have changed. In terms of alternative approaches, the Council could continue with the existing policies, or with only minor amendments, however that is not considered a realistic alternative option as fundamental changes are required to improve quality of planning outcomes, remove repetition of the policies and address “gaps” in policy such as addressing biodiversity and promoting health and wellbeing and improving placemaking.

A number of policies will be safeguarding policies, which can be applied to the determination of all development proposals. These policies will include a range of criteria for assessing impact upon the built and natural environment, safeguarding amenity, preventing pollution etc.

Policy Ref	Policy Title	Policy Aims	Scoped In/Out	Reason	Safeguarding Policy?
PP1	Placemaking	Requires development to ensure compliance with Designing Streets, Creating Places, the Council's Urban Design Guide. Detailed policy guidance under a number of headings promoting healthy places, with character and identity.	In	Updated Policy PP3 of LDP15 which reflects Scottish Planning Policy ambitions for raising design quality.	No
PP2	Sustainable Economic Growth	Promoting development which supports the Moray Economic Strategy where it complies with safeguarding policies.	In	Similar policy to PP1 in MLDP2015 with a focus on employment land.	No
PP3	Infrastructure and Services	Safeguarding existing infrastructure and planning for new infrastructure.	In	New policy, not subject to SEA previously. Merges elements of EP3, T1, T4 and T7 of LDP15.	No

Policy Ref	Policy Title	Policy Aims	Scoped In/Out	Reason	Safeguarding Policy?
DP1	Development Principles	General policy principles on design, layout, drainage, amenity, landscaping, access to be applied to all developments.	In	SEA process will be useful to ensure all objectives are covered in this “catch all” policy, which is fundamental to the rest of the policies in the new format. Merges elements of various policies including IMP1, EP1, EP2, E9, PP3, PP2, T2 and T5 of LDP15.	Yes
DP2	Housing	Policy covers housing density, affordable housing, accessible housing, integration, gypsy/ traveller sites.	In	Merges previous policies H1, H8, H9 and H11 of LDP15.	No
DP3	LONG Term Land Reserves		Out	Largely based on Policy H2 of the MLDP2020.	No
DP4	Rural Housing	New policy approach for Rural Groupings and housing in the open countryside. Stricter policy in the open countryside, promoting better siting and design and more opportunities identified in Rural Groupings.	In	Merges Policies H5, H6 and H7 of LDP15.	No

Policy Ref	Policy Title	Policy Aims	Scoped In/ Out	Reason	Safeguarding Policy?
DP5	Business and Industry	Hierarchical approach to employment sites from business parks to general employment land and inward investment sites.	In	Merges elements of ED1, ED2, ED3, ED4 and ED5 of LDP15.	No
DP6	Mixed Use (MU) and Opportunity sites (OPP)		In	Policy extended to cover mixed use sites.	No
DP7	Retail/Town Centres	Role of Town Centres, Town Centre First Principles, sequential approach and out of town proposals.	In	Merges policies R1, R2 and R3 of LDP15.	No
DP8	Tourism Facilities and Accommodation	Criteria for assessing proposals for tourism facilities and accommodation.	Out	Largely unchanged from Policy ED8 of LDP15.	No
DP9	Renewable Energy	Criteria for considering renewable energy proposals.	Out	Policy is unchanged from LDP2015. Policy has been subject to SEA and was subject of Examination process.	No
DP10	Minerals	Safeguarding of existing mineral reserves and policy framework for considering new proposals.	In	Wording has been revised and policies merged.	No
DP11	Gypsy/ Travellers/ Travelling Showpeople	Policy framework to consider proposals for Gypsy/ Traveller sites and to safeguard Travelling Showpeople.	In	Criteria has changed and action included in Action/ Delivery Plan	No

Policy Ref	Policy Title	Policy Aims	Scoped In/ Out	Reason	Safeguarding Policy?
EP1	Natural Heritage Designations	Safeguarding Moray's international, national and local natural heritage, promoting biodiversity.	In	Merges Policies E1, E2, E3, E4, E6 of LDP15	Yes
EP2	Biodiversity	New policy requiring a range of measures to safeguard and promote biodiversity.	In	New policy.	Yes
EP3	Special Landscape Areas and Landscape Character	Safeguarding for Coastal Protection Zone, Countryside Around Towns and Special Landscape Areas.	In	Merges policies E7, E8, E10 of LDP15.	Yes
EP4	Countryside Around Towns	Aims to protect the sensitive rural areas around the outskirts of Moray's main towns.	Out	Covered by previous SEA, policy intent remains unchanged.	Yes.
EP5	Open Space	Safeguards existing open spaces plans for new open space associated with development proposals. Sets out quality and quantity standards.	In	Updated Policy E5 of LDP15.	Yes
EP6	Settlement Boundaries	Aims to safeguard the area immediately outwith settlement boundaries from development.	Out	Covered by previous SEA, policy intent remains unchanged.	Yes.
EP7	Forestry, Woodlands and Trees	Aims to protect trees and woodlands.	Out	Covered by previous SEA, policy intent remains unchanged.	Yes.

Policy Ref	Policy Title	Policy Aims	Scoped In/ Out	Reason	Safeguarding Policy?
EP8	Historic Environment	Safeguarding of Moray's national historic heritage.	Out	Covered by previous SEA, policy intent remains the same.	Yes
EP9	Conservation Areas	Safeguarding of Conservation Areas.	Out	Covered by previous SEA, policy intent remains the same.	Yes
EP10	Listed Buildings	Safeguarding of listed buildings	Out	Covered by previous SEA, policy intent remains the same.	Yes
EP11	Battlefields, Gardens and Designed Landscapes	Safeguarding of Battlefields, Gardens and Designed Landscapes.	Out	Covered by previous SEA, policy intent remains the same.	Yes
EP12	Management and Enhancement of the Water Environment	Sets out policy on flooding, SUDS, waterbodies and foul drainage	In	Merges Policies EP4, EP5, EP6, EP7 and EP10 of LDP15.	Yes
EP13	Foul Drainage	Achieve the satisfactory disposal of sewage	Out	Policy is unchanged from LDP2015. Policy has been subject to SEA and was subject of Examination process.	Yes
EP14	Pollution, Contamination and Hazards	Policy aims to ensure no pollution will arise from development proposals, or adverse effects arise from hazardous or contaminated sites.	In	Merges EP8, EP9 and EP11 of LDP15.	Yes

Policy Ref	Policy Title	Policy Aims	Scoped In/Out	Reason	Safeguarding Policy?
EP15	MOD Safeguarding	Policy ensures development proposals comply with safeguarding requirements and consultation zones associated with MoD facilities in Moray.	Out	Policy wording has only very minor rewording from LDP15.	No
EP16	Geodiversity and Soil Resources	Policy requires developers to consider likely impacts upon soil.	Out	Policy wording has only very minor rewording from LDP15.	No
DEL1	Delivery of Effective sites and Action/ Delivery Programme	Requires landowners and developers to provide programming and delivery information annually.	Out	Operational policy.	No
DEL2	Maintaining an effective supply of land for housing and employment uses.	Identifies requirement to maintain effective housing and employment land supplies and that intervention using CPO powers will be used if required.	Out	Operational policy.	No

Table 6- Scoping policies

13. Scoping Supplementary Guidance

A number of Supplementary Guidance papers may support the Local Development Plan 2020. Most have been subject to SEA previously and are intended to be carried forward with only minor revisions, such as the merging of Affordable and Accessible housing Supplementary Guidance. Other Guidance have recently been produced and it is proposed to carry these forward with the necessary hooks introduced into the new Plan. No Guidance is included in this SEA, but will be subject of SEA at Proposed Plan stage.

Title of Guidance	Description	Scoped in/Out	Reason
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Title of Guidance	Description	Scoped in/Out	Reason
Developer Obligations	Guidance sets out the evidence base and process for securing developer obligations in Moray.	Out	Financial and procedural information only. No likely significant environmental effects.
Wind Energy Policy Guidance	Sets out spatial framework and detailed policy considerations for different typologies of windfarms.	Out	Guidance was submitted to the Scottish Government in June 2016 for approval. Guidance was subject to SEA and will be unchanged other than updated policy references.
Forestry and Woodlands Strategy	Sets out preferred areas for new forestry planting and opportunities for tourism/ recreation related projects.	Out	Guidance is being presented to the Council's Planning and Regulatory Services Committee in August 2017 for approval. Guidance and has been subject to SEA.
Open Space Strategy	Sets out an audit of open spaces in Moray's main towns and also sets out quality and quantity standards.	Out	Guidance approved by the Council's Planning and Regulatory Services Committee in August 2017. Guidance will not be amended (other than policy references) and was screened out from SEA.
Flood Risk and Drainage Supplementary Guidance	Sets out details on flood risk management and promotes sustainable urban drainage solutions.	In	
Findrassie Masterplan	Masterplan for 1500 houses, new primary school, retail and community facilities in the north of Elgin on site R11 in the MLDP15.	Out	Strategic Masterplan which has previously been screened out from SEA and is being brought forward with relevant policy hooks as statutory supplementary guidance.

Title of Guidance	Description	Scoped in/Out	Reason
Dallas Dhu Masterplan	Masterplan for sites R6, R10 and LONG2 designated in the MLDP15.	Out	Strategic Masterplan which has previously been screened out from SEA and is being brought forward with relevant policy hooks as statutory supplementary guidance.
Elgin South Masterplan	Masterplan for 2,500 houses, 2 primary schools, sports centre, retail and community facilities on Elgin South LONG2 designation in the MLDP15.	Out	Strategic Masterplan which has previously been screened out from SEA and is being brought forward with relevant policy hooks as statutory supplementary guidance.
Bilbohall Masterplan	Masterplan approved for approximately 400 houses.	Out	Strategic Masterplan which has previously been screened out from SEA and is being brought forward with relevant policy hooks as statutory supplementary guidance.

Table 7: Scoping Supplementary Guidance

14. Relationship with other PPS and environmental protection objectives

The preparation of the Key Environmental Issues needs to take account of a range of international; national; and local plans, programmes, and strategies (PPS). [Error! Reference source not found.](#) summarises the main documents influencing preparation of the Key Environmental Issues, and the implications for both the Key Environmental Issues and the Environmental Assessment process.

15. Scoping Main Issues

The Main Issues were scoped to identify which ones were likely to have a significant environmental impact.

Table: Scoping of Main Issues

Main Issue	Scoped in/out
The Growth Strategy	In
Providing a generous and effective supply of land for housing	In
Creating integrated, quality, healthy places	In
Providing a generous employment land supply	In
Taking an Infrastructure First approach	In
Pressures on Moray's landscape	In
Safeguarding and Promoting Biodiversity	In
Delivering on Climate Change	In
Rural Housing	In

Table 8: Scoping Main Issues

Main Issues scoped in were then assessed against the SEA objectives.

Assessment Matrix of Main Issues-

Key to Matrices

0 No likely impact assessed

N/A No relationship identified

+ likely positive environmental impact

++ likely significant positive environmental impact

5. Taking an infrastructure first approach	+	+	+	+	+	+	?	+	+	+	+	++	++
6. Pressures on Moray's landscape and rural cultural heritage	0	0	+	+	+	0	0	0	0	+	0	++	+/-
7. Safeguarding and promoting biodiversity	+	+	0	++	+	+	0	0	+	+	++	++	0
8. Delivering on climate change	+	++	+	+	+	+	+	+	+	+	+	+	0
9. Rural Housing	+	+	+	+	+	+	0	0	-	0	0	+	+

The above strategic level matrix assessment of Main Issues highlights a number of issues, the most significant being that in highlighting and introducing the appropriate mitigation the main issues highlighted will bring significant environmental benefits in Moray, notably for objectives 9,11 and 12. The infrastructure first approach supports the spatial strategy and the proposed new approach to Rural Housing reduces the pressure on the landscape and rural infrastructure.

16. ASSESSMENT OF SITES

The table below identifies sites considered in the Main Issues Report and Proposed Plan. These were included in the SEA Scoping Report submitted to the gateway and any additional, new sites added. A number of existing designated sites have been deleted or amended through the checklist evaluation where a significant environmental impact or conflict with new national policy is evident.

The list and decision whether to progress to detailed assessment has been further refined in light of additional consultation responses and further evaluation of sites.

Settlement	Site Ref	Site Name	Proposed Use in LDP2020	Scoped in/out	Justification	Post Scoping Assessment	Detailed assessment In/Out
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Aberlour	LDP2020_BID_AB1	Land at Tombain Farm, Aberlour	Residential Expansion Of Speyview Site	In	Scoped in due to potential impacts on River Spey SAC and landscape and as a reasonable alternative.	The site cannot achieve an acceptable means of access given the road network of single track roads and narrow streets. There are no dedicated pedestrian/cycle routes and no means to overcome these issues. On this basis the site in its current form cannot be taken forward. In addition to this there are issues in relation to the prominence of the steeper areas of the site, that if developed could have a negative landscape impact. The site does however offer the opportunity to explore the creation of pedestrian and cycle connections back into Aberlour from the designated Speyview site.	Out. Main site not supported for inclusion in Proposed Plan due to potential landscape impacts. Small part of site identified as suitable for housing and to provide an active travel connection linking Speyview with Sellar Place.
Buckie	LDP2020_BID_BK3	Land Adj. to Ardach Health Centre, Buckie	12-15 Flats	In	Scoped in due to potential impact on	Following detailed technical consultations,	Out

					landscape	no likely significant environmental effects have been identified. Development is small scale and any landscape impact can be mitigated through on site landscaping to link into adjacent green corridors.	
Buckie	LDP2020_BID_BK7	Land at Muirton, Buckie	Residential	In	Scoped in due to potential impacts on landscape and cumulatively large expansion	Scope in. Proposal forms part of a cumulatively large expansion with potential landscape impacts. SEPA have stated that should the bid be supported, adequate measures must be put in place to avoid pollution entering the drain. The site is also within proximity to Gollachy Civic Amenity & Transfer Station, Buckie and burn on east side of site has cooling water discharge from Inchgower distillery.	In
Buckie	LDP2020_BID_BK9	Land to South West of	Residential	In	Scoped in due to	Proposal comprises of	In

		Buckie			potential impacts on landscape and cumulatively large expansion.	a large expansion to the south western edge of Buckie. Such a cumulatively large expansion could lead to potential landscape impacts. SEPA state that there is a drain running in the west of the development site. It is not clear if it enters at some point in the burn of Gollachy but adequate measure should be put in place to prevent any pollution entering the drain.	
Buckie	LDP2020_BID_BK10	Buckie Ambulance Services Site	Mixed Uses	In	Scoped in due to potential impact on water environment.	Bid is scoped in due to potential impact on the water environment. Potential issues regarding flooding and contamination have also been raised which will have to be addressed before the site can be fully supported.	In

Burghead	LDP2020_BID_BG3	Clarkyhill, Burghead	60 Houses	In	Scoped in due to potential impact on landscape.	Scoped in due to potential impact on landscape.	In
Cullen	LDP2020_BID_CL1	Land opposite Cullen Cemetery	Industrial	In	Scoped in due to potential impact on landscape and historic environment.	Scoped in, proposed access could impact on historic environment.	In
Dyke	DK2	Fir Park Road	Residential	Out	New site introduced in response to MIR representation. Small site on edge of settlement, no likely significant impact.		
Elgin	LDP2020_BID_EL1	Land Adj. to R4 Mayne Farm, Elgin	Residential	In	Scoped in due to potential impacts on landscape and proximity to River Lossie	Scope in due to the potential impacts on the landscape and proximity to River Lossie water environment.	In
Elgin	LDP2020_BID_EL2	Land Adj. to R12 Knockmasting Wood, Elgin	Residential	In	Scoped in due to potential impacts on landscape and proximity to River Lossie	Scoped out as despite there being a potential impact on the landscape and River Lossie, the bid is not being supported.	Out
Elgin	LDP2020_BID_EL6	Land at Mayne Wood, Elgin	Residential	In	Scoped in due to potential impact on landscape	Scope out, despite there being a potential impact on the landscape. This bid is not being	Out

						supported.	
Elgin	LDP2020_BID_EL7	Sunningdale, Mayne Farm, Elgin	10 Houses	In	Scoped in due to potential impact on landscape	Scoped out as despite there being potential impact on the landscape, this bid is not being supported	Out
Elgin	LDP2020_BID_EL8	Findrassie Woods	Develop Concept for Findrassie Wood	In	Scoped in due to proximity to SSSIs and Loch Spynie	The proposal has the potential to impact on the Findrassie Site of Special Scientific Interest (SSSI), notified for geological fossil features. The proposal also has the potential to impact on woodland resources contrary to the Scottish Government's Policy on Control of Woodland Removal. The site is scoped in for these reasons.	Out. Bid not supported and not included in Proposed Plan.
Elgin	LDP2020_BID_EL9	Land north of I8 and West of A941	Release of LONG and Mixed Use Development	In	Scoped in due to proximity to Loch Spynie		In
Elgin	LDP2020_BID_EL13	Burnside of Birnie	200-300 Houses and Neighbourhood Facilities	In	Scoped in due to proximity of gas pipeline and potential impacts on landscape	As the Linkwood Burn runs through the site there is potential for impacts on the water	In

					and water environment	environment. The scale of development and location on a key approach to Elgin there is potential for landscape impacts. A high pressure gas pipelines runs through the site. The site is therefore scoped in.	
Elgin	LDP2020_BID_EL14	Barmuckity	Mixed Use Expansion of Barmuckity	In	Scoped in due to potential impacts on landscape and flood risk	Whilst part of the site has been subject to SEA for LDP2015 there are new areas that have not. The expanded site area has potential flood risks and due to the scale and location on a key approach to Elgin has potential landscape impacts. The site is scoped in for these reasons.	In
Elgin	LDP2020_BID_EL16	Site at Bain Avenue, Elgin	Affordable Housing	In	If this bid was supported, it will be scoped in due to potential impact on flood risk and impact on open space.	The proposal is for small scale development in area where there is significant surface water flooding	Out. Site not included in Proposed Plan.

						problems. The site is scoped in for this reason	
Elgin	LDP2020_BID_EL21	Land at ENV4 South Lesmurdie	Affordable Housing	In	Scoped in due to potential impact on open space	The proposed site would result in the loss and reconfiguration of a playspace and open space. The site is in close proximity to the River Lossie. The site is scoped in for these reasons.	In
Elgin	LDP2020_BID_EL23	Land at Pinegrove	Affordable Housing	In	Scoped in due to potential impact on open space	The proposed development would result in the loss and reconfiguration of open space and potentially a play space. However, designation requirements to retain the play space and ensure the balance of development to open space reflects the character of the area would mean impacts are unlikely to be	Out

						significant.	
Elgin	LDP2020_BID_EL25	CF2 Edgar Road	Affordable Housing	In	If this bid was supported, it will be scoped in due to potential impact on landscape and proximity to wetlands	Proposed bid is scoped in due to potential impact on landscape and proximity to wetlands. The site is directly adjacent to The Wards (local Wildlife Site). The Wards is in the raised Bog inventory therefore GWTDE are present within 250m. Developer Requirement for buffer strip to protect The Wards.	In
Elgin	LDP2020_BID_EL37	Land to the rear of Riverside Kitchens	Micro Distillery	In	If this bid was supported, it will be scoped in due to potential impacts on ancient woodland	Scoped out as, despite there being potential on woodland and the water environment, the bid to identify a site for a micro distillery is not supported.	Out
Elgin	LDP2020_BID_EL38	Land to the West of R4	Extension of R4 for 120 Houses	In	If this bid was supported, it will be scoped in due to	Scope in due to the potential impacts on the landscape and	In

					potential impacts on landscape and proximity to River Lossie	proximity to River Lossie water environment.	
Elgin	R8 Proposed Plan	Alba Place	Residential	In	High profile site along frontage. Sensitive layout and design required.		In
Elgin	Town Hall	OPP9 in Proposed Plan	Arts, Cultural and Community Facilities		Grade B listed building.		In
Elgin	Grant Lodge	OPP10 in Proposed Plan	Arts, Cultural and Community Facilities		Grade B listed building currently lying empty.		In
Elgin	Walled Garden	OPP11 in Proposed Plan	Arts, Cultural and Community/ Visitor Facilities.		Listed walls immediately adjacent to schedule ancient monument of Elgin cathedral.		
Findhorn	LDP2020_BID_FH1	Field at Bichan Farm, Findhorn	Residential, Car Parking and Holiday Accommodation	In	Scoped in due to potential impacts on landscape and biodiversity	Scoped in due to potential impacts on landscape and biodiversity	Out. Site not included in Proposed Plan.
Findhorn	LDP2020_BID_FH4	Findhorn Bay Caravan Park	Glamping	In	Scoped in due to potential impact on flood risk	Not supported due to flooding issues.	Out
Fochabers	LDP2020_BID_FC1	Land at Castle Street, Fochabers	Housing	In	Bid not supported.	The proposal would represent an extension to the historic core of the settlement. The site	Out

						itself is located within an ENV designation which is grassed and contains several mature trees which also has a path running through it. Although the area could be in better condition it does have amenity value in terms of being accessible for the public to use, providing a buffer from the A96, as well as adding character to edge of the settlement from the mature trees.	
Fochabers	LDP2020_BIC_FC4	Land at Castle Street, Fochabers	Housing	In	Bid not supported.	The proposal would represent an extension to the historic core of the settlement. The site itself is located within an ENV designation which is grassed and contains several mature trees which also has a path	Out

						running through it. Although the area could be in better condition it does have amenity value in terms of being accessible for the public to use, providing a buffer from the A96, as well as adding character to edge of the settlement from the mature trees.	
Forres	LDP2020_BID_FR2	Land at Waterford	Industrial	In	Scoped in due to potential impact on water environment	Scoped in due to potential impact on water environment	In
Forres	LDP2020_BID_FR7	Land at Pilmuir Road West	Extension to R11	In	Scoped in due to potential impact on water environment	Potential impact on the water environment.	Out. Site not included in Proposed Plan.
Forres	LDP2020_BID_FR10	OPP8 Whiterow	Extend Existing Designation	In	Scoped in due to potential impact on landscape	Scoped in due to potential impact on landscape.	In
Forres	LDP2020_BID_FR11	Land north of A96	Mixed Use Housing, Commercial, Retail and	In	Scoped in due to potential impact on landscape	Scoped in due to potential impact on landscape	Out. Site not included in the

			Employment				Proposed Plan.
Forres	LDP2020_BID_FR17	Field West of Benromach Distillery	Additional Warehousing	In	Scoped in due to potential impact on water environment	Scoped in due to potential impact on water environment.	In/ Assessment covered by Waterford, Forres assessment, ref FR2
Forres	LDP2020_BID_FR18	Former Forres Railway Station	Extension to Existing Industrial Estate	In	Scoped in due to potential impact on water environment	Scoped in due to potential impact on water environment	In
Forres	OPP3 in Proposed Plan	Castlehill hall				Site added at Proposed Plan stage.	In
Forres	LONG2 in Proposed Plan	Easter Newforres	Employment land		Potential landscape impact	Site added at Proposed Plan stage.	In
Garmouth	LDP2020_BID_GM2	Land north of Northfield Place	15-20 Houses	In	If this bid was supported, it will be scoped in due to potential impacts on landscape and water environment	The site would form disproportionately large expansion of Garmouth and would therefore have potential landscape impacts although previously landscape advice identified mitigation in this respect. Due to the proximity there is potential impact on the River Spey/Lower River Spey-Spey Bay SAC's and Moray and Nairn Coast SPA/RAMSAR. Scoped out as, despite	Out

						there being a potential impact on landscape and water environment, this bid is not being supported.	
Hopeman	LDP2020_BID_HP2	Mains of Inverugie, Hopeman	15-20 Houses	In	If this bid was supported, it will be scoped in due to the scale of proposal and potential impact on landscape	Scoped out, potential impacts are minor and local, not significant. The bid as submitted is not proposed.	Out
Hopeman	LDP2020_BID_HP3	Land at Golf Club Car Park	10 Houses and 6 Holiday Lets	In	If this bid was supported, it will be scoped in due to potential impact on landscape	Bid not supported as submitted.	Out
Hopeman	LDP2020_BID_HP6	Lower Backlands	Residential to Supplement R1 and LONG	In	If this bid was supported, it will be scoped in due to potential impact on landscape	Potential impacts are minor and local, not significant. The bid as submitted is not proposed.	Out
Hopeman	LDP2020_BID_HP7	Land South of West Beach Caravan Park	Extension of T1	In	Scoped in due to potential impacts on landscape	Scoped in due to potential impact on foreshore area.	In
Keith	LDP2020_BID_KE2	Denwell Road, Keith	20 Houses	In	If this bid was supported, it will be scoped in due to potential impact on water environment	The proposal to retain the site as white land within the settlement boundary is supported. If the	In

						proposal to designate the land for housing is supported it would be scoped in due to potential impact on the water environment. The Den burn is canalised in sections and consideration should be given to re-naturalising and a large buffer strip. Developer Requirement for buffer strip to watercourse(s), assessment of re-naturalising of any section of canalised burn in site boundary. Site is within vicinity of Balloch Road Civic Amenity Site, Keith.	
Kinloss	LDP2020_BID_KN3	Land at Former Abbeylands School	Aerospace Exhibition Centre	In	Potential flooding issues.	Scoped in, if the bid is supported, due to the potential impact on the water environment.	In
Mosstodloch	LDP2020_BID_MS1	Land West of Mosstodloch	Strategic Employment Land	In	Scoped in due to proximity of River Spey SAC	The site is scoped in due to the proximity	In

						to the River Spey SAC and Moray and Nairn Coast SPA and Ramsar. It is also a large scale expansion of the settlement for strategic employment uses. This site is approximately 1.9km from the River Spey Special Area of Conservation (SAC) and although there appear to be a watercourse running between the site and the SAC, it enters the SAC several kilometres downstream.	
Mosstodloch	LDP2020_BID_MS2	Field South of A96 Bypass, Mosstodloch	165-220 Houses	In	Scoped in due to large scale of proposal and proximity to River Spey SAC	The site is scoped in due to the scale of development and proximity to the River Spey SAC and Moray and Nairn Coast SPA and Ramsar.	In
Portgordon	LDP2020_BID_PG1	Land to South of R1 Portgordon	Residential	In	If this bid was supported, it will be scoped in due to potential impact on	Scope out. Despite there being potential landscape impacts, this proposal is not	Out

					landscape	supported.	
Portgordon	LDP2020_BID_PG2	Land to South of R2 Portgordon	Residential	In	If this bid was supported, it will be scoped in due to potential impact on landscape	Scope out. Despite there being potential landscape impacts, this proposal is not supported.	Out
Roths	LDP2020_BID_RT1	Land at Drumbain Farm, Roths	Industrial Designation	In	Bid not supported.	Landscape advice has been sought and the site is assessed as being of very high sensitivity in landscape terms. The development site is highly prominent visually within an outstanding landscape setting and located at a gateway into the settlement. The site is not considered appropriate for development due to significant adverse landscape and visual impact.	Out

Table 10- Assessment of sites.

Development Sites Assessment Summary

The detailed site assessments are set out in **Assessment of Vision** and summarised below.

Table 11: Site Assessment Summary

Settlement	Proposed Plan ref	Site	Comments / Significant Environmental Issues	Mitigation
Buckie	R7	Land at Muirton/ South west f Buckie	Requires extensive landscaping as a new growth and co-ordination of new infrastructure. Flooding, drainage and archaeological evaluation required.	Significant landscaping required. Flood Risk Assessment. Drainage Assessment. Masterplan approach to infrastructure co-ordination. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.
Buckie- land to south west	R8 and LONG	Barhill Road		Large Growth area to be masterplanned. Flood Risk Assessment and Drainage Assessment required. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.
Burghead	R2	Clarklyhill	Some surface water issues and the site is elevated and potentially quite prominent in the landscape.	Significant landscaping required. Drainage Impact Assessment. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse

				effects.
Cullen	I1	Land opposite Cullen cemetery	Potential adverse impact on designated garden and habitats and proximity to regionally important site.	Drainage Assessment. The access point is the crucial issue to be addressed and has to be agreed with HES and Regional Archaeologist to avoid any significant adverse effects on cultural heritage assets. Safeguarding policies EP8-11
Elgin	R4	South West of Elgin High School	Flooding and drainage issues.	Flood Risk Assessment. Drainage Impact Assessment. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.
Elgin	EL9	Land north of I8 and west of A941.	Regionally significant archaeological site, close proximity to Loch Spynie SPA, flooding and drainage issues.	Key sensitivities are proximity to Loch Spynie SPA and open landscape on the settlement edge. Mitigation and safeguarding is in place through policy and settlement statement requirements. Flood Risk Assessment. Drainage Impact Assessment. Safeguarding policies PP1,

				PP3, DP1, EP5, EP12 No significant adverse effects.
Elgin	I6/ LONG 3	Burnside of Birnie	Potential impacts on Linkwood Burn wildlife corridor, potential flooding issues and open agricultural land requires extensive landscaping.	Flood Risk Assessment. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.
Elgin	I7	Barmuckity	Significant landscape impacts on most parts of the site which cannot be mitigated. Flooding and drainage issues to be addressed.	Significant landscaping required. Flood Risk Assessment. Drainage Impact Assessment. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.
Elgin	R14	South Lesmurdie	Poor quality open space. Site protected by flood scheme.	Flood Risk Assessment. Drainage Impact Assessment. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.

Elgin	R2	Edgar Road	Number of water features in the area and surface water issues.	<p>Flood Risk Assessment.</p> <p>Drainage Impact Assessment.</p> <p>Masterplan being prepared for this site and adjacent sites to co-ordinate infrastructure provision.</p> <p>Safeguarding policies PP1, PP3, DP1, EP5, EP12</p> <p>No significant adverse effects.</p>
Elgin	R8	Alba Place	Need to respect local character of area.	<p>Design and layout site requirements included.</p> <p>Safeguarding policies PP1, PP3, DP1, EP5, EP12</p> <p>No significant adverse effects.</p>
Elgin	OPP9	Town Hall	Impacts upon listed building.	<p>Safeguarding policies EP8-11.</p> <p>No significant adverse effects.</p>
Elgin	OPP10	Grant Lodge	Impacts upon listed building and parkland setting.	<p>Safeguarding policies EP8-11.</p> <p>No significant adverse effects.</p>
Elgin	OPP11	Walled	Impacts upon listed walled garden	Safeguarding policies EP8-

		Garden	and proximity to cathedral and river Lossie in parkland setting.	11, EP12.
Forres	I2	Land at Waterford	Site previously flooded and has some archaeological interest. Loss of prime agricultural land.	<p>Drainage Impact Assessment.</p> <p>Increased pedestrian/ cycle movements require re-evaluation of safe crossing provision at A96.</p> <p>Safeguarding policies PP3, DP1, EP5, EP12</p> <p>Additional wording added to address safe crossing.</p> <p>No significant adverse effects.</p>
Forres	OPP7	Whiterow	Proximity to battlefield and WW2 airfield. Surface water issues.	<p>Archaeological evaluation.</p> <p>Flood Risk Assessment.</p> <p>Drainage Impact Assessment.</p> <p>Safeguarding policies PP1, PP3, DP1, EP5, EP12</p> <p>No significant adverse effects.</p>
Forres	LONG2	Easter Newforres	Landscape sensitivity.	<p>Additional text added to settlement statement.</p> <p>No significant adverse effects.</p>

Forres	OPP3	Castlehill Hall	Sensitive listed building in poor condition.	Safeguarding policies EP8-11. No significant adverse effects.
Hopeman	T1	Land south of west beach caravan park	Adjacent to Moray Firth SAC, sensitive coastal location. Potential flooding issues.	Flood Risk Assessment. Drainage Impact Assessment. Safeguarding policies DP1, EP2, EP12. No significant adverse effects.
Hopeman	R3	Forsyth Street	Impact upon open landscape.	Site included as consented on appeal. Some mitigation included on siting and design but no mitigation other than not designating the site would safeguard against loss of open aspect..
Keith	R8	Denwell Road	Considerable surface water issues.	Flood Risk Assessment. Drainage Impact Assessment. Noise Impact Assessment. Safeguarding policies PP1, PP3, DP1, EP5, EP12 No significant adverse effects.
Kinloss	OPP2	Land at former Abbeylands	Surface water issues.	Safeguarding policies PP3, DP1, EP5, EP12

		school		No significant adverse effects.
Mosstodloch	I3/ LONG2	Land west of Mosstodloch	Site is close to the River Spey SAC and Moray and Nairn Coast SPA, Fluvial flood risk across the site.	Flood Risk Assessment. Drainage Impact Assessment. Transport Assessment. Safeguarding policies PP3, DP1, EP5, EP12 No significant adverse effects.
Mosstodloch	LONG1	Field South of A96 bypass	Potential landscape impact, prominent site adjacent to A96. Located between 2 areas of flood risk.	Flood Risk Assessment. Drainage Impact Assessment. No significant adverse effects.

17. Summary Assessment of Policies

Summary Assessment of Policies:

Policy Reference	Comments
PP1 Placemaking	Policy is assessed as strongly positive aiming to raise the standards of placemaking in new developments, promote sustainable travel options, better quality open space, promote health and wellbeing and create places with character and identity.

PP2 Sustainable Economic Growth	Policy is positive, recognising the need for sustainable economic growth to be balanced with environmental issues.
PP3 Infrastructure and Services	Policy is assessed as strongly positive, aiming to safeguard existing infrastructure and provide for new infrastructure requirements. However, an issue was highlighted regarding the need for earlier delivery of infrastructure and services, especially public transport, to ensure new communities have access to services and are not left “isolated”. Policy highlights the shift towards an infrastructure first approach.
DP1 Development Principles	A “catch all” criteria policy which is assessed as strongly positive, providing further detail to PP1 and applicable to all developments. Promotes sustainable transport options, quality green spaces, safeguarding water environment, promoting biodiversity and promoting a better quality of life for residents/ workers/ visitors.
DP2 Housing	A policy with positives in terms of identifying land in the most suitable and least environmentally sensitive places in accordance with the spatial framework and designations which have been subject to intensive scrutiny with statutory consultees, further positives in providing affordable and accessible housing, but safeguarding policies are required at development management stage to mitigate impacts.
DP4 Rural Housing	A policy with a positive outcome, seeking to move from a permissive to more controlled policy, promoting better siting and design of housing in the countryside and reinforcing the settlement hierarchy, reducing the impact in rural areas, reducing loss of woodlands and prime agricultural land.
DP5 Business and Industry	A policy which has a potential negative impact, providing guidance on considering proposals for business and industry, however, the policy does cross reference to DP1 and other policies and supports much needed employment land.
DP6 Mixed Use (MU) and Opportunity sites (OPP)	A strongly positive policy supporting re-use of brownfield opportunity sites and supporting mixed use approach on some sites to support their delivery.
DP7 Retail/ Town Centre	Policy is assessed as positive seeking to safeguard vitality and viability of Town Centre and promote a Town Centre first approach, reducing the need to travel by car with more active travel options available.
DP10 Minerals	Policy is assessed as positive, aiming to safeguard existing mineral reserves and plan for future needs, with provision for aftercare and restoration.
DP11 Gypsy/ Travellers/ Travelling Showpeople	Policy could have a negative impact upon natural and cultural heritage interests and it is proposed to add a reference to “all other relevant policies” or similar wording.
EP1 Natural Heritage	Policy is assessed as strongly positive, aiming to safeguard international, national and local natural heritage interests, contributing to the high quality of life in Moray.
EP2 Biodiversity	Policy is assessed as strongly positive, safeguarding and enhancing biodiversity in new developments.
EP3 Special Landscape Areas and Landscape Designations	Policy is assessed as positive aiming to safeguard designated landscape areas and embed the Landscape Character Assessment. However, there may be a need to include additional policy guidance

	on hill tracks and this will need to be considered when the LCA has been published.
EP5 Open Space	Policy is assessed as strongly positive, aiming to achieve much higher quality new greenspaces, promoting biodiversity and connectivity, ensuring they have a purpose and form part of a hierarchy of spaces.
EP12 Managing the Water Environment	Policy is assessed as strongly positive aiming to safeguard development from flooding, ensure good drainage and protection of the water environment.
EP14 Pollution, Contamination and Hazards	Policy is assessed as strongly positive aiming to control pollution, consider and remediate contamination and safeguard new development from hazards.

Table 12 : Summary Assessment of Policies

18. Mitigation Measures / Proposed Action

The Environmental Assessment (Scotland) Act 2005 requires an explanation of “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the Plan. At this stage of plan preparation, no significant environmental effects have been identified which cannot be mitigated or addressed through proposed safeguarding policies. However, this will be re-assessed at Proposed Plan stage.

The changes arising from SEA identified earlier in this report will be incorporated into the Proposed Plan.

19. Monitoring

The Environmental Assessment (Scotland) Act 2005 requires the Council to monitor significant environmental effects of the implementation of the Plan. Monitoring will assess the predicted effects and to assess the mitigation measures identified. The Local Development Plan and Supplementary Guidance will be monitored annually or bi-annually. Specific indicators will be used for the LDP as shown in the table below.

In terms of the Wind Energy Policy Guidance, monitoring will identify any Landscape Character Types where cumulative impact is becoming a critical issue and where additional assessment work is required. The Council will also monitor the overall effectiveness of the Guidance and update the text to reflect current policies.

A meeting of key environmental agencies will be hosted by the Council at least annually to consider environmental issues arising both in terms of site specific case work and the impact and effectiveness of policies. Any additional guidance or clarification over interpretation of guidance will be addressed along with monitoring the effects of the Plan as it is delivered.

Objective	Measure	Source	Frequency
1. Improve Air Quality	Air quality monitoring for Moray	Moray Council Environmental Health – Air Quality Monitoring Reports	2 years
2. Reduce the causes and impacts of climate change	Moray CO2 emissions No. of households in Moray at risk of flooding	DECC – Local Authority CO2 emission statistics Moray Council Flood Team / SEPA	2 years
3. Increase energy efficiency and the proportion of energy generated from renewable sources	% or MW output of renewable energy installed in Moray	Moray Council Planning – Planning applications	2 years
4. Protect and enhance the biodiversity and landscape	No. of wind energy proposals approved out-with areas of search % area of land within SLA's given over to major applications Number of planning applications requiring a species license	Moray Council Planning – Planning Applications Moray Council Planning – Planning Applications SNH records.	2 years

5. To protect and enhance cultural heritage and diversity	No. of applications for listed building consent	Moray Council Planning – Planning Applications	2 years
6. Protect and enhance the quality of the districts ground, river and sea water systems	<p>Water quality ecological status of freshwater bodies in rivers and the coastline</p> <p>No. of bathing water areas in Moray passing bathing water quality standards</p> <p>Diffuse pollution and phosphates within River catchment areas</p> <p>Planning consents granted within the functional flood plain</p>	SEPA – Bathing and river water quality and abstraction rates	2 years
7. Improve soil quality and use soil in a sustainable manner	<p>Number of identified contaminated land sites</p> <p>Number of remediated contaminated land sites</p> <p>% of vacant and derelict land</p>	<p>Moray Council Contaminated Land team</p> <p>Moray Council Contaminated Land team</p> <p>Moray Council Planning</p>	2 years
8. Reduce the amount of	% recycling rates	Moray Council	2 years

waste produced and increase the amount of recycling	Tonnes of waste to landfill	Waste Team	
9. Promote the use of sustainable transport	Car ownership levels Type of transport used by Moray residents Length of cycle and walkways in Moray	Moray Council Planning – Moray Information Bulletin	2 years
10. Ensure prudent use of natural resources	% and area of prime agricultural land given over to development	Moray Council Planning	2 years
11. Protect, enhance and create green spaces and to regenerate degraded environments	% and area of structural landscaping provided in large scale developments % of land designated as environmental designations lost to development % of population within walkable distance to public park	Moray Council Planning – Planning Applications Moray Council Planning – Planning Applications Open Space audit	2 years
12. To secure a better quality of life for local people through improvements to service provision, sustain a healthy economy with high levels of employment and improve the health and well-being of local people	% of persons unemployed in Moray Quality Auditing results % of homes built annually that are affordable No of new health	Unemployment Bulletin Moray Council records Moray Council Housing	2 years

	facilities provided	Moray Council Planning /NHS	
	No of new employment land sites created	Moray Council /HIE	
13.To promote the sustainable use and management of material assets.	Infrastructure requirements identified in the Proposed Plan.	Moray Council's Infrastructure Delivery Group	annually

Table 13: Monitoring Indicators

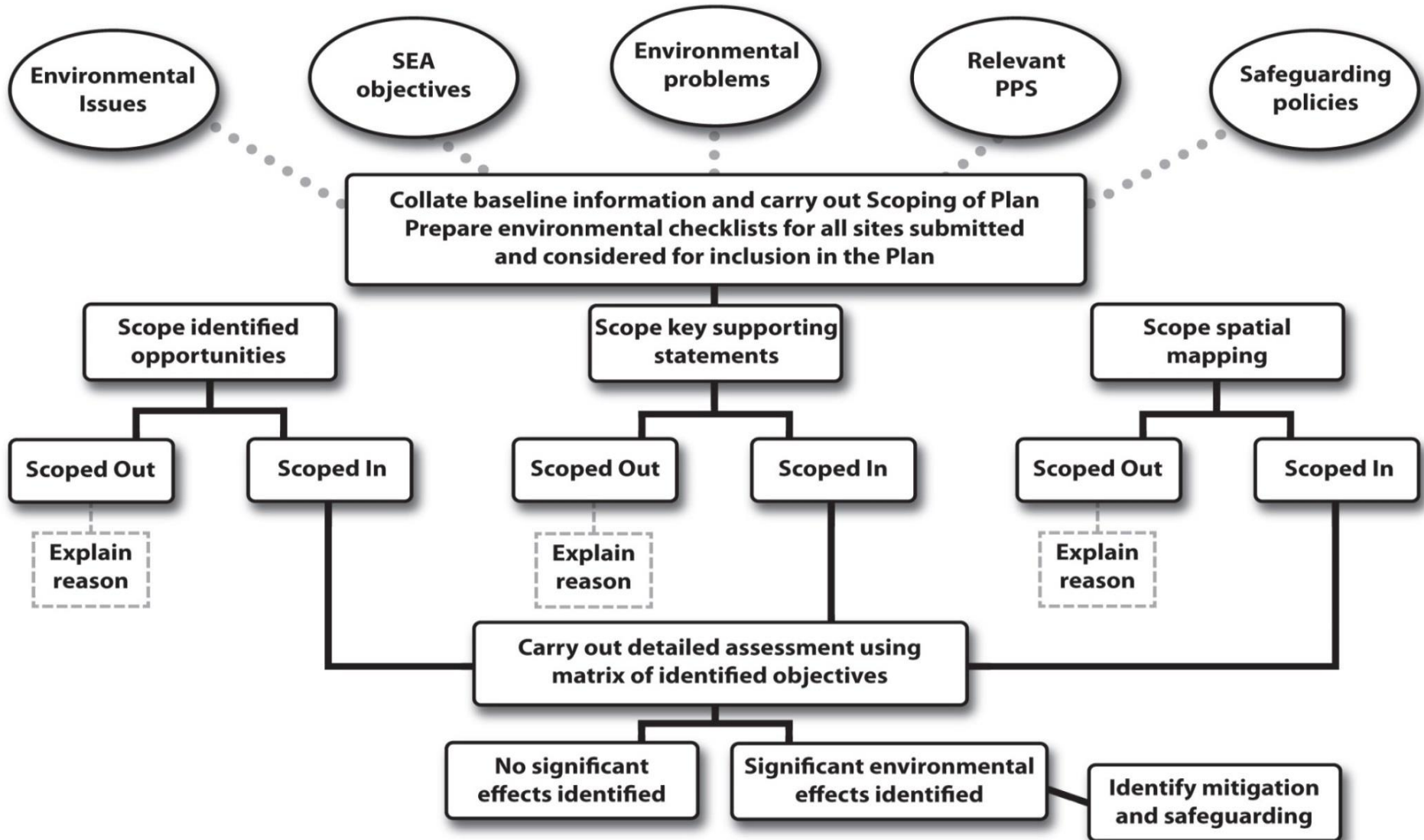
20.Next Steps

The future milestones in the development of the Local Development Plan and the Strategic Environmental Assessment are;

- Proposed Plan reported to Planning and Regulatory Services Committee- December 2018.
- Consultation on Proposed Plan- January to mid- March 2019
- Examination- August 2019 to March 2020
- Adoption of new Local Development Plan- June 2020

21.Appendix 1 - SEA Methodology

SEA Methodology



Appendix 2- Link to other PPS and environmental objectives

Appendix 3- Existing designations scoped in/out

Appendix 4- Bid Site Scoping

Appendix 5- Policy Assessments

Appendix 6- Site Assessments

Appendix 7- Consultation authorities responses to Scoping

Appendix 8- Consultation authorities responses to draft Environmental Report

Appendix 9- Assessment of Rural Groupings

Appendix 10- Consultation authorities responses to Proposed Plan

Matrix assessment scoring

++ Significant positive

+ Positive

--Significant negative

-Negative

0 No impact

? Unknown impact