

April 2019

# Moray Housing Land Audit



**moray**  
council



## Moray towns and Local Housing Market Areas (LHMA)



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## Preface

This schedule of housing land is produced by the Moray Council in consultation with local housebuilders and landowners. While every effort has been made to ensure that the information in the audit is accurate and complete, the attention of the user is drawn to the following points:

- The introduction contains advice on the interpretation and analysis of the statistics and this should be carefully studied, to avoid possible misrepresentation.
- The information on housing is presented comprehensively for sites of 4 or more houses, only aggregated annual totals of past completions are given for smaller sites and individual houses.
- Development Plans, Capital Programmes and commitment levels are continually being updated and should be checked with the appropriate source to obtain the current position.

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## Contents

1	Purpose of Audit	1
2	Preparation of Audit	1
3	Land Supply Definitions	2
4	Established Land Supply	3
5	Constrained Land Supply	4
6	Effective Land Supply	5
7	Rest of Moray	5
8	Windfall sites	6
9	Completions	6
10	Housing Requirement and Effective Housing Land Supply	7
11	Long term housing designations	9
	<b>Glossary</b>	<b>13</b>
	<b>Development Schedules</b>	<b>15</b>



# 1 Purpose of Audit

- 1.1 This audit provides details of Moray's housing land supply as at January 2019. The audit explains the different classifications of land within the overall supply and compares supply with the housing land requirement identified through the Housing Need and Demand Assessment.
- 1.2 The audit also examines past and future predicted trends in housing land supply and identifies any action required to address issues arising.
- 1.3 The audit has been produced using the guidance set out in Scottish Planning Policy, Planning Advice Note 2/2010 and Homes for Scotland Advice Note on Housing Land Audits.
- 1.4 Scottish Planning Policy 2014 requires planning authorities to ensure;
  - Local development plans set out the housing supply target (separated into affordable and market sectors) and the housing land requirement for each housing market area up to year 10 from the expected year of adoption.
  - Allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement in full.
  - Provide a minimum of 5 years effective land supply at all times.
  - Indicate the possible scale and location of the housing land requirement beyond year 10 and up to year 20.

# 2 Preparation of Audit

- 2.1 The audit has been prepared by The Moray Council using details of all relevant development sites within the Moray Local Development Plan 2015 and other (windfall) sites with planning consent for residential use. New sites identified in the emerging Proposed Plan will be included in the 2020 Audit.
- 2.2 Completions have been recorded through contact with housebuilders and analysis of building warrant completion certificates. Constraints have been identified through the local development plan process and through discussion with statutory consultees.
- 2.3 Details of sites with a capacity of 4 or more houses are recorded and an assessment made of potential future development rates, informed by landowners and developers. This takes account of planning status, infrastructure constraints, building capacity, market demand and financial plans.

## 3 Land Supply Definitions

3.1 There are three categories of land identified within the audit.

### 3.2 **Established Housing Land Supply**

3.2.1 This is the total housing land supply, calculated by adding the effective and constrained land together. This includes sites under construction, sites with planning consent and other sites agreed as having potential for development.

### 3.3 **Effective Housing Land Supply**

3.3.1 This is the housing land supply that is expected to be free from development constraints and available for construction of housing. Most sites with planning consent for residential development and/or identified within the Moray Local Development Plan 2015 fall into this category where the site is free of the following constraint:-

- Ownership
- Physical
- Contamination
- Deficit funding
- Marketability
- Infrastructure
- Land

### 3.4 **Constrained Housing Land Supply**

3.4.1 This consists of sites which at the time of the audit were not assessed as being effective. The principal reason for the site being constrained is identified in the schedules. The identified constraint is considered to be significant and may not be resolved within the “effective” land supply period. This also includes “LONG” designations, which are constrained under the terms of Policy H2 of the Local Development Plan.

## 4 Established Land Supply

4.1 The established land supply for the Moray Local Development Plan is shown in Table 1 below.

	2015	2016	2017	2018	2019
<b>Moray</b>	<b>6,421</b>	<b>13,090</b>	<b>13,112</b>	<b>12,848</b>	<b>12,387</b>

*Table 1: Established Land Supply*

4.2 The established land supply in 2019 has a capacity of 12,387 units. This reflects the new Local Development Plan being adopted in July 2015 introducing a series of new sites which now form part of the established land supply. This includes extensive areas of LONG term land.



## 5 Constrained Land Supply

5.1 The constrained land supply is shown in Table 2.

	2015	2016	2017	2018	2019
<b>Moray</b>	<b>3,947</b>	<b>10,384</b>	<b>8,318</b>	<b>9,210</b>	<b>8,198</b>

Table 2: Constrained Land Supply

5.2 A total of 8,198 units are constrained in 2019. Table 3 below summarises the constrained sites and the nature of the constraint. The table shows that the majority of these sites are constrained through programming either as "LONG" designations or programmed as unlikely to be built within the 5 year effective period. LONG sites can only be considered effective when the required triggers for release of LONG sites have been met and the site is free of the constraints listed in paragraph 3.3.1.

5.3 Sites with a capacity of 1,560 units are considered to be effective "5 year +", which means that they will be built out beyond the 5 year period and are otherwise free of constraints.

<b>Constraint</b>	<b>No. of units</b>	<b>No. of sites</b>
Deficit Funding	24	1
Effective 5yr+	1,560	6
Marketability	1,109	44
Ownership	122	6
Physical	276	13
Programming	362	5
LONG	4,745	11
<b>Total</b>	<b>8,198</b>	<b>86</b>

Table 3: Analysis of Constraints



## 6 Effective Land Supply

6.1 The five year effective land supply for the Moray Local Development Plan area is shown in Table 4.

	2015	2016	2017	2018	2019
Moray	2,474	2,706	4,094	3,638	4,189

Table 4: Effective Housing Land Supply

6.2 The effective housing land supply has a capacity of 4,189 units. A site at Elgin South for the proposed Moray Sports Centre, Linkwood Primary School and approximately 150 units was released through the 2016 audit and sites at Bilbohall have also come forward from the constrained supply to the effective supply. This figure is further supplemented by the effective 5yr+ figure of 1,560 units, which are constrained only by market conditions and the ability of developers to build sites out quicker.

## 7 Rest of Moray

7.1 In the Rest of Moray there are a number of consents granted for sites with a capacity of 4 units and over, which cumulatively make a significant contribution to the housing land supply. New consents and completions are monitored and added to the schedules as part of the audit. The contribution from small sites and the role of sites in rural communities was discussed and agreed with Homes for Scotland as part of the 2009 audit. However, the agreed figure of 50 units has been increased to 65 to reflect the scale of rural development in Moray. A figure of 65 units is included for completions in 2019 and future years.



## 8 Windfall sites

- 8.1 A windfall site is a site not specifically allocated for development in the Local Development Plan but which becomes available for development or is granted planning permission during the lifetime of the Plan.
- 8.2 The contribution of windfall sites to the number of units completed and projected to be complete will be monitored. Windfall completions can make a significant contribution to the land supply.

	2013	2014	2015	2016	2017	2018
Windfall completions	25	13	63	42	56	38

Table 5a: Windfall sites

	2019	2020	2021	2022	2023
Projected windfalls	39	29	0	48	0

Table 5b: Projected windfall

## 9 Completions

- 9.1 Table 7 identifies previous completion rates, which all fall significantly below the 2011 Housing Need and Demand Assessment's annual requirement of 538 units.

	2014	2015	2016	2017	2018
Moray	309	337	334	382*	312

2017\* note revised completion figure from figure published in 2018 Audit.

Table 6: Completions

- 9.2 Table 7 identifies projected completion rates for the five year effective housing land period. These are largely based upon returns from housebuilders and landowners and were subject to further refinement during the consultation period on the draft housing land audit.

	2019	2020	2021	2022	2023
Moray	304	472	577	575	400

Table 7: Projected Completion Rates

## 10 Housing Land Requirement & Effective Housing Land Supply

- 10.1 The Council's Housing Need and Demand Assessment 2011 identifies a requirement for 538 units per annum for the period 2012-2024. This includes an element of flexibility and provided a baseline to which further generosity was added to derive the final housing land requirement for the Local Development Plan. This is significantly higher than the figure used for the Moray Structure Plan 2007 of 380 units per annum and significantly higher than recent completion rates in Moray.
- 10.2 Using the HNDA 2011 figure the five year requirement is therefore  $538 \times 5 = 2690$  units. ***These figures will be replaced in the 2020 Audit with the HNDA 2017 figures and housing supply targets set out in the emerging new Local Development Plan.***

	Housing Land Supply	No. of years supply
Established	12,387	23.0
Effective	4,189	7.8
Constrained	8,198	15.2

Table 8: Land supply/ No. of years supply

- 10.3 This can be broken down further by Local Housing Market Area.

LHMA	5yr requirement	Effective land supply	Projected Completions 2018 - 22
Buckie	410	284	227
Elgin	1,200	2,875	1,257
Forres	575	694	552
Keith	255	159	159
Speyside	240	177	133
<b>Total</b>	<b>2,690</b>	<b>4,189</b>	<b>2,328</b>



*Table 9: Land supply by Local Housing Market Area*

10.4 Table 9 highlights that the effective supply identified in the housing land audit meets the 5 yr requirement for Elgin and Forres LHMA's. Shortfalls in Buckie, Keith and Speyside are being addressed through the new Local Development Plan and Delivery Programme.

10.5 The audit totals of effective, constrained and established housing land supply are set out in Table 10 below.

	2015	2016	2017	2018	2019
<b>Effective</b>	<b>2,474</b>	<b>2,706</b>	<b>4,794</b>	<b>3,638</b>	<b>4,189</b>
<b>Constrained</b>	<b>3,947</b>	<b>10,384</b>	<b>8,318</b>	<b>9,210</b>	<b>8,198</b>
<b>Established</b>	<b>6,421</b>	<b>13,090</b>	<b>13,112</b>	<b>12,848</b>	<b>12,387</b>

*Table 10: Moray Housing Land Supply 2019*



## 11 Long term housing designations

11.1 Long term designations have been identified to set out the direction of growth and to assist in the forward planning of infrastructure and landscape enhancement/ mitigation. The Council will evaluate the need for early release of long term housing land through the annual housing land audit process and monitoring report. The release of LONG term designations is controlled through Policy H2 of the Local Development Plan and a Technical Note approved by the Council's Planning and Regulatory Services Committee on 24th June 2015. The triggers are;

- \* A shortfall in the 5 year effective land supply is identified in the annual Housing Land Audit which cannot be met by:
  - 1) Windfall provision assuming previous trends
  - 2) Constrained sites which are likely to become available for development to meet the shortfall in the relevant timeframe.

In these circumstances an appropriate release of LONG term land may be recommended where:

- This can be achieved without compromising delivery of a master-planned approach and where appropriate access, infrastructure and landscape setting can be secured.
- The site is demonstrated to be effective within the next five years.
- Where the release of LONG term land is required to deliver key objectives of the Council and its Community Planning partners.

In operating the triggers for release of LONG term land when a shortfall in the 5 year effective land supply in the primary or secondary centres is identified in the annual Housing Land Audit, the Council will consider whether;

- a) the shortfall is considered to be significant
- b) whether the shortfall is likely to be met through windfall provision based on previous trends
- c) whether constrained sites are likely to become available for development to meet the shortfall and whether sites are constrained only through programming
- d) whether the shortfall compromises the ability to meet the housing land requirements set out in Policy H1 of the Local Plan.

If the shortfall is significant and unlikely to be overcome in the short term then an appropriate release of LONG term land will be recommended to meet the shortfall.

TOWN	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
ABERLOUR						0	0	18	20	12	12	160
ALVES												250
ARCHIESTOWN	1						0	0				35
BUCKIE	55	65	41	46	31	13	51	41	26	26	18	457
BURGHEAD	5	4	4	4			0			10	10	92
CRAIGELLACHIE								0	0			42
CULLEN	6											85
CUMMINGSTON			1	0	0	0	1	1	1			
DALLAS												14
DUFFTOWN	0	0	10	16	0	0	0	0	6			141
DYKE				0			0	2	2	2	2	9
ELGIN	101	92	177	204	187	143	97	139	208	240	198	6035
FINDHORN	31	0	0	0	17	3	4	2				
FINDOCHTY												55
FOCHABERS		4	8	4	3	24	9	9	15	10	10	169
FORRES	32	83	29	13	63	59	42	89	102	123	62	1329
GARMOUTH/KINGSTON												10
HOPEMAN							16	11	10	10		50
KEITH	3	7	3	22	25	4	1	35	36	22		396
KINLOSS	0	0	0		0	0	1	3	6	3	3	34
LHANBRYDE									25	25		15
LOSSIEMOUTH	10	6	14	9	6	16	17	27	26	27	20	219
MOSSTODLOCH		0	0	0				30	29			60
NEWMILL												10
PORTGORDON	1											95
PORTKNOCKIE												50
RAFFORD												10
REMAINDER OF MORAY	50	50	50	50	50	50	65	65	65	65	65	65
ROTHES												120
ROTHIEMAY												27
URQUHART												25
	295	311	337	368	382	312	304	472	577	575	400	10,059



The amount of land to be released will be dependent upon an assessment of what other sites will become effective to ensure a continuous five year effective housing land supply.

A shortfall of effective housing land in one of the five main towns should be met through a LONG term release in the same town.

Where a decision is made to release LONG term land and there is more than one LONG term site in that settlement, an assessment will be made as to which site is considered the most suitable based on considerations such as infrastructure, landscaping, settlement pattern and effectiveness.

Outwith the five main towns, LONG term sites will only be considered for early release where the residential land designations are clearly demonstrated to be constrained for the entire plan period and that constraint cannot be overcome.

A summary assessment of the triggers against each LONG term site will be presented to the Council's Planning and Regulatory Services Committee with a recommendation as to whether there is any need to release LONG term land. This will be based upon further discussion with Homes for Scotland and other consultees during the consultation period after which the table below will be completed.

Settlement	Site	Comment/ Triggers	Recommendation
Aberlour	Braes of Allachie	Effective land supply of 106 units, projected 5 year completions 62 units.	No need to release.
Alves	Alves North	0 effective land supply.	No need to release.
Elgin	North East	Effective land supply of 2197 units, projected 5 year completions 882.	No need to release.
Elgin	South	Effective land supply of 2197 units, projected 5 year completions 882.	150 units already released, phase 1 application under consideration. No need to release.
Fochabers	Ordiquish Road East	Effective land supply of 72 units, projected 5 year completions 53 units.	No need to release.
Forres	Lochyhill	Effective land supply of 591 units, projected 5 year completions 418 units.	No need to release.
Forres	Dallas Dhu	Effective land supply of 591 units, projected 5 year completions 418 units.	No need to release.
Forres	West Park Croft	Effective land supply of 591 units, projected 5 year completions 418 units.	No need to release.
Hopeman	Manse Road	Effective land supply of 47 units, projected 5 year completions 47 units.	No need to release.

Settlement	Site	Comment/ Triggers	Recommendation
Keith	Edindiach Road	Effective land supply of 94 units, projected 5 year completions 94 units.	No need to release.
Urquhart	Meft Road	Effective land supply of 0 units.	No current interest from developers.
Urquhart	Station Road	Effective land supply of 0 units.	No current interest from developers.

Table 11: LONG term sites

Buckie	M/BC/R/038 Former Jones Shipyard	Deleted record- remove as a housing site
Burghead	M/BH/R/006 Granary North Quay	All constrained, previously part constrained with 6 effective units.
Burghead	M/BH/R/04 Clarkly Hill	Pushed programming back, starting 2022.
Elgin	M/EL/R/15/12 Knockmasting wood	Pushed programming back, starting 2022.
Elgin	M/EL/R/15/14 Lesmurdie Fields	Changed to effective, starting 2021
Elgin	M/EL/R/07/05 Bilbohall South and CF2	Changed programming, lowered completions within effective period.
Elgin	M/EL/R/07/06 South West of Elgin High	Pushed programming back, starting 2023.
Forres	M/FR/R/07/04 Lochyhill	Pushed programming back starting 2022.
Forres	M/FR/R/07/08 Mannachy	Pushed programming back starting 2021.
Keith	M/KH/R/035 Caravan park, Dunnyduff Road	Moved to Constrained 2024 onwards
Keith	M/KH/R/015 Edindiach Road/ Balloch Road	Move to constrained 2024 onwards.
Lhanbryde	M/LH/R/07/01 West of St Andrews Road	Moved from constrained to effective, starting completions in 2021, 2023 pause to reflect private/ affordable programme.

The following definitions and classification in the schedules apply:

### Housing Sites - SITE DETAILS GLOSSARY

<b>Site Ref</b>	Area/Settlement or Parish/Residential/Sequential Reference Number.
<b>Location</b>	Address of Site.
<b>Owner</b>	Current owner of the site.
<b>Developer</b>	Agency responsible for the development and management of the site and not necessarily to the actual construction company.
<b>Tenure</b>	Five tenure types are specified:- HA - Housing Association for rent LA - Local Authority PRIV - Private MOD - Ministry of Defence Other - Other tenure, i.e. housing association shared ownership or low cost home ownership and joint venture between a local authority and a private developer.
<b>Area</b>	Site areas are quoted in hectares and represent the gross area of the site.
<b>Units</b>	The capacity of sites is expressed as a number of house units. For sites where no detailed housing layout has yet been prepared and no density has been specified, then an estimate has been made.
<b>Serviced</b>	Indicates the number of housing units which are serviced.
<b>Not built</b>	Total number of house units on the site which have not yet been built at the date of the update.
<b>Effective</b>	Currently effective (EFF) or constrained (CON)
<b>LPR</b>	Local Plan Site Reference
<b>Land Use</b>	Categorises the main existing or former use of a site before it is re-zoned or developed. The land use categories used are:-  AGR 1-7            Agricultural Land by Class (1, 2 & 3. 1 = prime) AG BLDG            Agricultural Building WOOD              Woodlands (may also be grazed) HORT               Allotments and nurseries PRIV/PUB OS       Privately or publicly owned open space (e.g. Grounds of a large house or hospital)  RESID              Residential COMM               Commercial EDUC               Educational RAIL                Railway MOD                Ministry of Defence PUB BLD            Public Building UNUSED            Derelict, Vacant, Backland etc. COMMTY            Community IND                 Industry
<b>Greenfield/ Brownfield</b>	Describes whether the site is within an urban area or previously developed (brownfield) or outwith the urban area and not previously developed (greenfield).



## APPLICATION DETAILS

<b>Applic Ref</b>	Reference number of planning applications relating to the development of the site. Note where applications are made for individual plots within a site, these have been grouped together under the Application Reference 'Individs' with no decision date given.
<b>Units</b>	Number of units relating to each planning application.
<b>Type</b>	Describes the type of permission application:- OUT      Application for Outline Planning Permission DET      Application for Full Permission or Permission of Reserved Matters
<b>Decision</b>	Details of decision on the application. Apart from self explanatory terms – Approved, Refused, Withdrawn, Expired, Pending, it has been necessary to indicate the latest classified either as 'Superseded' or 'Duplicate'.
<b>Dec. Date</b>	Date of final decision on the application.

## COMPLETION DETAILS

<b>Built</b>	Take up rates (in house units) for the previous 5 years are listed on an annual basis and assessments of subsequent completions are also listed annually for the next 5 years.
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