



**REPORT TO: PLANNING AND REGULATORY SERVICES COMMITTEE ON
15 SEPTEMBER 2020**

SUBJECT: HOUSING LAND AUDIT 2020

**BY: DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND
FINANCE)**

1. REASON FOR REPORT

- 1.1 This report summarises the housing land supply situation in Moray and asks the Committee to agree the final version of the Moray Housing Land Audit 2020.
- 1.2 This report is submitted to Committee in terms of Section III (E) (2) of the Council's Scheme of Administration relating to the Review and Preparation of Strategic and Local Plans.

2. RECOMMENDATION

- 2.1 It is recommended that the Committee;
- (i) note the housing land supply in Moray;
 - (ii) agree the responses set out in Appendix 1; and
 - (iii) agree the finalised Moray Housing Land Audit 2020 in Appendix 2.

3. BACKGROUND

- 3.1 Scottish Planning Policy (SPP) requires planning authorities to carry out regular monitoring of housing completions and to programme projected completions to demonstrate the availability of land for housing. The aim is to ensure that an ongoing effective supply of housing land is available. This is achieved through an annual Housing Land Audit prepared in consultation with Homes for Scotland, local developers, landowners and statutory consultees.
- 3.2 SPP requires Local Development Plans (LDP) to allocate land on a range of sites to meet the housing land requirement up to year 10, providing effective sites in the initial phase for at least 5 years from the date of adoption. The aim is to maintain sufficient effective land for 5 years at all times. Beyond

year 10 and up to year 20, the LDP should provide an indication of the possible scale and location of the housing land requirement.

3.3 The audit has three key functions:-

- To demonstrate the availability of sufficient effective land to meet the strategic housing land requirement for a minimum of 5 years into the future;
- To provide a snapshot of the amount of land available for the construction of houses at any particular time; and
- As an information source for a variety of purposes including school roll forecasts, transport infrastructure provision and health care.

4. **PROPOSALS**

4.1 The information contained in the audit is important to monitor the LDP strategy for housing and the process enables adjustments to be made to address any issues arising. The audit and the Housing Need and Demand Assessment (HNDA) provide the baseline for calculating the housing land requirements set out in local development plans.

4.2 The audit includes three main categories of land supply:-

- Effective- land that can be developed for housing within the period under consideration, which is free from constraints in terms of ownership, physical, contamination, marketability, infrastructure and land use.
- Constrained- land that is considered to be constrained within the period under consideration and the constraint cannot easily be overcome in the short term.
- Established- the total housing land supply (effective added to constrained).

4.3 The draft audit was made available for consultation on the Council website and housebuilders and agents were notified, with comments invited by 12 April 2020. Comments were received from Homes for Scotland (HfS), Barratt Homes and a late response, understandably due to Covid-19, from Springfield Properties Plc (SPL). Housebuilders and landowners were consulted during preparation of the draft audit to provide the most up to date build out projections. Comments received and the proposed Council responses are set out in **Appendix 1**. Members will recall that HfS and SPL challenged the housing land supply through the Local Development Plan Examination process with the Reporter finding in the Council's favour. Many of the site specific comments relate to the effectiveness of sites which have constraints or have stalled for other reasons. The Council is progressing a project aimed at addressing constrained sites, particularly in rural areas and within Town Centres. Policy DEL1 and DEL2 in the new Moray Local Development Plan (MLDP) 2020 are also intended to ensure that developers and landowners demonstrate commitment to bring land forward for development which is designated in the Plan.

4.4 The introduction section of the final audit is included as **Appendix 2** and the full audit is available on the members' portal. The audit identifies that there is

a 30.2 year established housing land supply (based on an annual housing land requirement identified in the HNDA of 12,528 units. This consists of a 13.6 years effective housing land (5638 units) and 16.6 years constrained housing land (6890) of which 10.8 years supply is designated as LONG (4505 units). New sites identified in the MLDP 2020 have been included in the 2020 audit.

- 4.5 Completions in 2019 were 414 compared with 358 in 2018, 350 in 2017, 335 in 2016, 336 in 2015, 311 in 2014, 295 in 2013, 342 in 2012, 418 in 2011 and 431 in 2010. The majority of completions in 2010-2017 were in Elgin, Forres and Buckie.
- 4.6 While the overall effective supply of housing land is very good and continues to meet the requirements of SPP, the projected house completions reflect the low supply of new housing in Keith and Speyside.
- 4.7 To address any shortfalls in supply, the MLDP 2020 contains a number of LONG term housing sites, which are embargoed from development within the period of the LDP unless specific triggers for their release are met.
- 4.8 The triggers for releasing LONG designations are set out in policy DP3 "LONG Term Land Reserves" in the MLDP 2020.
- 4.9 The projections in this years' audit have been significantly amended to reflect the implications Covid-19 has had on the construction industry, with sites closed during shutdown, followed by a slower re-opening and possible supply chain issues. There has also been limited input from housebuilders and landowners due to lockdown and many staff being furloughed. The projections must therefore be treated with additional care, however, the audit demonstrates a healthy and well managed housing land supply in Moray to meet future needs.

5. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))

The annual Housing Land Audit is a key part of monitoring the implementation and effectiveness of the LDP, which delivers Corporate and Community Planning objectives. Ensuring an effective supply of housing land and taking a longer term approach supports economic growth, delivers much needed housing, notably affordable housing and allows for longer term planning for community services and infrastructure including education and health facilities.

(b) Policy and Legal

The preparation of an annual Housing Land Audit is a key requirement of SPP to monitor the effectiveness of the MLDP and ensure an effective supply of housing land is maintained.

(c) Financial implications

None.

(d) Risk Implications

None.

(e) Staffing Implications

Preparation of an annual housing land audit is part of the workload of the Strategic Planning and Development section.

(f) Property

None.

(g) Equalities/Socio Economic Impact

There are no equalities issues arising from this report.

(h) Consultations

Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Equal Opportunities Officer, Lissa Rowan (Committee Services Officer), the Senior Engineer Transportation, Paul Connor (Principal Accountant) and the Housing Strategy and Development Manager have been consulted and comments received have been incorporated into the report.

6. CONCLUSION

6.1 SPP requires planning authorities to carry out an annual Housing Land Audit to ensure there is a 5 year effective housing land supply available at all times.

6.2 The Housing Land Audit 2020 identifies that there is a 13.6 year effective supply of housing land with a total 30.2 year established land supply. Triggers to control the release of LONG term sites under the terms of Policy H2 have been agreed. An assessment of LONG term sites against these triggers has concluded that there is no need to release additional LONG term sites through the audit to meet the minimum housing land requirements of SPP.

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Background Papers:

Ref: