

July 2023

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 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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1 Purpose of Audit

- 1.1 This audit provides details of Moray's housing land supply as at January 2023. 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 Planning Advice Note 2/2010 and Homes for Scotland Advice Note on Housing Land Audits.

2 Preparation of Audit

- 2.1 The audit has been prepared by Moray Council using details of all relevant development sites within the Moray Local Development Plan 2020 and other (windfall) sites with planning consent for residential use.
- 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 2020 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 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.

	2019	2020	2021	2022	2023
Moray	12,387	12,751	12,346	12,192	11,770

Table 1: Established Land Supply

4.2 The established land supply in 2023 has a capacity of 11,770 units. This includes extensive areas of LONG term land, which act as a reserve and can be released should a shortfall be projected.



5 Constrained Land Supply

5.1 The constrained land supply is shown in Table 2.

	2019	2020	2021	2022	2023
Moray	8,198	6,940	6,838	6,827	6,748

Table 2: Constrained Land Supply

5.2 A total of 6,748 units are constrained in 2023, continuing to reflect the more proactive approach being taken to overcome constraints and explore ways of unlocking sites. 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 marketability or programming either as "LONG" designations or 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.

Constraint	No. of units	No. of sites
Contamination	64	2
Marketability	483	18
Ownership	635	5
Physical	282	11
Programming	1,409	9
LONG	3,875	9
Total	6,748	54

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.

	2019	2020	2021	2022	2023
Moray	4,189	5,811	5,508	5,365	5,022

Table 4: Effective Housing Land Supply

6.2 The effective housing land supply has a capacity of 5,022 units in 2023, reflective of the new sites identified in the Moray Local Development Plan 2020 which are included in the audit.

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 as 50 units with Homes for Scotland as part of the 2009 audit. A figure of 65 units was included in the 2019 audit. However, to reflect the new Rural Housing policy, this has been lowered to 40 units and will continue to be monitored and reviewed.



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.

	2018	2019	2020	2021	2022
Windfall completions	38	16	22	47	14

Table 5a: Windfall sites

	2023	2024	2025	2026	2027
Projected windfalls	42	56	30	35	14

Table 5b: Projected windfall

- 8.3 Windfall sites continue to demonstrate the historical trend of varied annual completions and projections.

9 Completions

- 9.1 Table 6 identifies previous completion rates. The impacts of the Covid-19 pandemic on housebuilding in Moray are clearly evident in the significantly lower house completions in 2020, however completions since appear to show a positive return to pre-covid figures.

	2018	2019	2020	2021	2022
Moray	358	414	231	398	418

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. As part of School Roll Forecasting, information is also provided to Education Services which includes a reduced ratio applied to projections within the Housing Land Audit for Elgin and Forres.

	2023	2024	2025	2026	2027
Moray	464	623	600	697	621

Table 7: Projected Completion Rates

10 Housing Land Requirement & Effective Housing Land Supply

10.1 The Council's Housing Need and Demand Assessment 2017 has informed the housing land supply and housing completions targets set out in the Moray Local Development Plan 2020. These figures have included a 30% generosity figure on top of the baseline figures from the Housing Need and Demand Assessment 2017. The key targets are;

- Annual housing completion target 2018-2035: 318 units
- Annual average housing land supply target 2018-2035: 414 units

10.2 Using these figures gives a 5 year completion target of 1590 units and a 5 year land supply target of 2070 units.

	Housing Land Supply	No. of years supply
Established	11,770	28
Effective	5,022	12
Constrained	6,748	16

Table 8: Land supply/ No. of years supply

LHMA	5 year supply target (5x 414)	5 year land supply 2023-2027	5 year completion target (5x318)	5 year projected completions	Comments
Buckie	342	576	1,590	431	Surplus effective housing land.
Elgin	1,037	2,632		1,562	Surplus effective housing land.
Forres	362	1,360		621	Surplus effective housing land.
Keith	170	143		143	Deficit effective housing land.
Speyside	159	311		236	Surplus effective housing land.
Total	2,070	5,022		2,993	Surplus effective housing land.

Table 9: 5 year housing land/ completion targets by LHMA

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

	2018	2019	2020	2021	2022	2023
Effective	3,638	4,189	5,638	5,508	5,365	5,022
Constrained	9,210	8,198	6,890	6,838	6,827	6,748
Established	12,848	12,387	12,528	12,346	12,192	11,770

Table 10: Moray Housing Land Supply 2023

TOWN	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028+
ABERLOUR				1	0	0	2	33	34	30	10	
ALVES												250
ARCHIESTOWN								3	3	3	3	23
BUCKIE	31	13	56	21	74	37	19	75	80	75	72	670
BURGHEAD										12	8	146
CRAIGELLACHIE											12	10
CULLEN								12	12	12	12	7
CUMMINGSTON	0	0	0	0	0	0	1	1	1			
DALLAS												10
DUFFTOWN									25	20	0	60
DYKE			2	0	5	5		1	1	1		5
ELGIN	155	189	200	111	121	146	182	205	211	266	268	5483
FINDHORN	17	3	1	2	9	10	10	8		13		
FINDOCHTY												55
FOCHABERS	3	24	6	6	11	4	15	20	20	20	25	80
FORRES	63	59	48	34	41	119	121	123	75	94	96	1327
GARMOUTH/KINGSTON												10
HOPEMAN				22			3	8	8	8	8	40
KEITH	25	4	12	4	3	31	23	27	24	17	12	158
KINLOSS	0	0	1				6	6	6	4	4	9
LHANBRYDE								31	41	37		
LOSSIEMOUTH	6	16	23	10	18	26	42	27	16	10	10	158
MOSSTODLOCH					76							70
NEWMILL												10
PORTGORDON											10	30
PORTKNOCKIE											12	38
RAFFORD										12		
REMAINDER OF MORAY	50	50	65	20	40	40	40	40	40	40	40	40
ROTHES										15	15	40
ROTHIEMAY												26
URQUHART								3	3	8	4	10
Total	350	358	414	231	398	418	464	623	600	697	621	8,765

11 Long Term Housing Designation

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.

11.2 The release of LONG term designations is controlled through the Policy DP3 *LONG Term Land Reserves* of the Moray Local Development Plan 2020. The triggers are:-

A shortfall in the 5 year effective housing land supply or shortfall in projected delivery of housing land is identified in the annual Housing Land Audits, 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; or
3. Where the release of LONG term land is required to deliver key objectives of the Council or its Community Planning Partners set out in the Local Outcome Improvement Plan, or to meet significant increased demand for housing arising from personnel deployment at RAF Lossiemouth or Kinloss Barracks.

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 landscaping setting can be secured.
- The site is demonstrated to be effective within the next five years.
- Any site specific triggers are fully complied with.

11.3 The amount of land to be released will be dependent upon an assessment of what other sites will become effective to ensure a continuous 5 year effective housing land supply. A shortfall of effective housing land in one of the 8 main towns should be met through a LONG term release in the same town.

11.4 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.

11.5 Outwith the 8 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.

Settlement	Site	Comment/Triggers	Recommendation
Alves	North	No effective land supply.	No requirement to release.
Buckie	South West	Effective land supply of 421 units, projected 5 year completions of 321 units.	No requirement to release.
Burghead	Clarkly Hill	Effective land supply of 66 units, projected 5 year completions of 20 units.	No requirement to release.
Elgin	North East	Effective land supply of 1,983 units, projected 5 year completions of 1,495 units.	No requirement to release.
Elgin	South	Effective land supply of 1,983 units, projected 5 year completions of 1,495 units.	Amendment to Elgin South phasing approved in 2021. No requirement to release.
Fochabers	Ordiquish Road East	Effective land supply of 145 units, projected 5 year completions of 100 units.	No requirement to release.
Forres	Lochyhill	Effective land supply of 1,239 units, projected 5 year completions of 509 units.	No requirement to release.
Keith	Nursery Field	Effective land supply of 103 units, projected 5 year completions of 103 units.	Release site to meet supply target due to deficit of effective land in Keith LHMA.
Urquhart	Meft Road	Effective land supply of 18 units, projected 5 year completions of 18 units.	No requirement to release.

Table 11: LONG Term Sites

The following definitions and classification in the schedules apply:

Housing Sites - SITE DETAILS GLOSSARY

Site Ref	Area/Settlement or Parish/Residential/Sequential Reference Number.
Location	Address of Site.
Owner	Current owner of the site.
Developer	Agency responsible for the development and management of the site and not necessarily to the actual construction company.
Tenure	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.
Area	Site areas are quoted in hectares and represent the gross area of the site.
Units	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.
Serviced	Indicates the number of housing units which are serviced.
Not built	Total number of house units on the site which have not yet been built at the date of the update.
Effective	Currently effective (EFF) or constrained (CON)
LPR	Local Plan Site Reference
Land Use	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
Greenfield/ Brownfield	Describes whether the site is within an urban area or previously developed (brownfield) or outwith the urban area and not previously developed (green-

APPLICATION DETAILS

Applic Ref	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.
Units	Number of units relating to each planning application.
Type	Describes the type of permission application:- OUT Application for Outline Planning Permission DET Application for Full Permission or Permission of Reserved Matters
Decision	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'.
Dec. Date	Date of final decision on the application.

COMPLETION DETAILS

Built	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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