

Appendix 1

Organisation		Moray Council Response	Changes proposed to audit
Homes for Scotland (HfS)	<p>With many land and planning staff from housebuilding companies on furlough, HfS has provided an initial response on behalf of members and ask that further comments are allowed once companies in the area are in a better position to engage both directly and through HfS.</p>	<p>Noted. Late comments from SPL have been accepted.</p> <p>Housing land supply is a key marker for the annual Planning Performance Framework required by the Scottish Government so the Council can't delay finalising the audit indefinitely.</p>	None.
	<p>The forecast completions rates in the draft are significantly higher than has been achieved in the past and HfS considers these to be very optimistic, especially with only one builder on site in the main town of Elgin.</p>	<p>Further work on refining projected completions between draft and final audit has amended the completion figures. However, HfS must recognise these projection figures are based on submissions from their members and in most cases would result in even higher projected completions.</p> <p>HfS must also recognise that while perhaps only one of their members is actively on site in Elgin, there are numerous other sites coming forward in Moray's main towns and not all housebuilders are members of HfS.</p> <p>The projections also reflect that the Council is actively seeking funding to assist in bringing forward previously constrained sites and if successful, this will boost completion figures.</p>	No further changes as adjustments had already been made prior to receipt of these late comments.

	<p>Looking at sections 6 and 9 of the draft, according to HfS calculation there is a shortfall in the 5 year effective housing land supply if it is measured against targets in the adopted LDP2015 rather than the emerging LDP2020, despite the high completion projections for the next few years. This is due to a shortfall in supply against target shortfall in completions since the base dates of both the 2015 and 2020 plans.</p>	<p>The 2019 audit stated that the 2017 HNDA figures would be used for the 2020 audit which would also include new sites identified in the MLDP2020.</p> <p>Unfortunately the calculation information provided by HfS is incorrect and confuses effective LAND supply with actual completions. This issue has previously been discussed at length with HfS and through the Examination process. The purpose of the audit is to demonstrate that an effective LAND supply is available and to also project how many house completions there will be annually.</p> <p>Having agreed previous annual housing land audits and not submitted any objection to the effective housing land supply it is disappointing and unfortunate that HfS again contest the effective housing land supply. The Reporters for the MLDP2020 Examination supported the Council's evidence that an effective housing land supply has been provided.</p>	<p>No change.</p>
	<p>HfS has not played an active role in the Moray audit in recent years as liaison has traditionally been direct between local stakeholders and the Council. In the</p>	<p>The Council does not accept that HfS has not played an active role in the Moray audit in recent years as the</p>	<p>No change.</p>

	<p>absence of some key HfS members this year, HfS are making this submission on the 5 year effective housing land supply in Moray in order to ensure a conversation takes place, ideally with further input when members have the capacity to engage. Ask the Council not to interpret the lack of engagement from local home builders as a sign of agreement to the audit and HfS would like a wider conversation when members are back at work on the overall completion rates that are being projected.</p>	<p>Council has attended HfS meetings regarding the audit and has attended audit meetings with members such as SPL to run through a list of site specific queries. HfS and SPL are both on record as having agreed previous audits and then both HfS and SPL challenged the effective housing land supply at the LDP2020 Examination, raising significant concerns for the Council regarding future “engagement” on housing land audits.</p> <p>The completion figures are based on initial returns from HfS members and other housebuilders and it is ironic that HfS now challenge these figures. The figures are scaled down by the Council and it is nationally recognised that beyond years 1 and 2 housing land audits are less reliable. To reflect this, the Council amends projections for detailed modelling such as school roll projections and transport studies.</p>	
Springfield property Limited (SPL)	<p>Late comments- The new MLDP demonstrates that a broad surplus of Effective Housing Land is shown across the Moray area, however, wish to query the number of completions suggested. Suggest projected completions for future years need to be reduced to</p>	<p>The Council is delighted that SPL has acknowledged that there is a surplus of effective housing land across Moray, given that SPL and HfS contested this at the LDP2020</p>	<p>No further changes as adjustments had already been made prior to receipt of these late comments.</p>

	<p>reflect Covid-19 and a cautious approach should be sought.</p>	<p>Examination, causing considerable delay, additional work and expense to the Council.</p> <p>The projected completions have been further adjusted between draft and final versions to reflect the impacts Covid-19 has had on the construction section and the Council would hope that all parties concerned would respect the difficulty of projections in the current climate and remember that the baseline is derived from returns from developers and landowners.</p>	
SPL	<p>Late comments- Contest the following sites and consider them to be constrained, owing to marketability or other factors; North Alves; East End, Archiestown; R3 Rathburn(N) and R4 Rathburn(S), Buckie; OPP1 West Foreshore, Burghead; R2 Clarklyhill, Burghead; R1 Edward Avenue, Craigellachie; R3 Brickfield, Craigellachie; R1 Seafield Road, Cullen; R3 Hillside Farm, Dufftown; R1 Morven Crescent, Findochty; R2 West of Primary School, Findochty; R4 Ordiequish Road, Fochabers; R3 Lochyhill, Forres; R15 Dallas Dhu, Forres; R1 Manse Road, Hopeman; R1 Seabraes, Portknockie; R1 Spey Street, Rothes.</p>	<p>These comments do not reflect the inclusion of some of these sites within the Council's Strategic Housing Investment Programme and that some of these sites are being considered through a targeted funding programme and some of them are subject to live planning applications.</p> <p>SPL also has to take into account the new MLDP contains two delivery focussed policies requiring submission of information from landowners and developers as proof that sites will come forward for delivery. This was previously discussed with HfS and SPL.</p>	No changes.

Barratt North Scotland	Revised figures for completions at Findrassie R11, Elgin provided, reducing projected completions in 2020 and 2021.	The Council welcomes these amended figures to reflect the impacts of Covid-19 on the programming for this site.	Amend projected completions for site ref M/EL/E/07/10.
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