



**REPORT TO: PLANNING AND REGULATORY SERVICES COMMITTEE ON 31
MAY 2022**

SUBJECT: HOUSING LAND AUDIT 2022

**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 2022.
- 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 Local Development Plans.

2. RECOMMENDATION

2.1 It is recommended that the Committee agree:-

- (i) to note the housing land supply in Moray;**
- (ii) the response to the consultation on the draft audit, as set out in Para 4.3 of the report; and**
- (iii) the finalised Moray Housing Land Audit 2022, as set out in Appendix 1 of the report.**

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 (HLA), 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 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
- Act 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 HLA is important to monitor 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 LDPs.

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 Housebuilders and landowners were consulted during the preparation of the draft audit to provide the most up to date build-out projections. The figures within the draft audit are largely based upon housebuilders' returns, with adjustments made by Planning Officers. The draft HLA 2022 was made available for consultation on the Council's website and housebuilders and agents were notified, with comments invited by 20 April 2022. Comments were received from Altyre Estate, Springfield Properties Plc and Homes for Scotland. Comments received and the proposed Council responses are set out below:-

Organisation	Comments	Moray Council Response	Changes Proposed to Audit
Altyre Estate	Agreement with status of sites	Noted.	No change.

	relating to Altyre Estate.		
Homes for Scotland	Challenge the effectiveness of Elgin R1 <i>Bilbohall North</i> (M/EL/R/048) on basis that planning consent 20/00905/APP relieves the infrastructure constraints of the site. Propose projections for remaining capacity across 2025 and 2026.	Following consultation with Transportation, it is agreed that whilst development on R1 is still reliant on the completion of improvements to bridge and road infrastructure, the planning consent for the adjacent site does remove the constraint of the site.	Amend the supply type of Elgin R1 (M/EL/R/048) from “Constrained” to “Effective” and amend projected completions.
Springfield Properties Plc	Agreement with all the denoted effective and constrained sites set out in the HLA.	Noted.	No change.
	Query regarding Buckie R8 (M/BC/R/20/08) and reference to “Effective 5 year +”	Where projections for build-out rates of an ‘Effective’ site extends beyond 5 years, there is a note attached to highlight this. This is consistent throughout the HLA and does not affect the overall consideration that the site is deemed effective.	No change.

4.4 The introduction section of the final audit is included as **APPENDIX 1** and the full audit has been uploaded to CMIS along with the agenda, as an additional document. The audit identifies that there is a 29 year established housing land supply (12,192 units) based on an annual housing land requirement identified in the HNDA. This consists of a 13 year effective housing land (5,345 units) and 16 years constrained housing land (6,827 units), of which 9 years supply is designated as LONG (3,875 units). This approach to LONG term housing land has been recognised as good practice and allows for longer term infrastructure planning through strategic level masterplanned expansion areas. This also means that the next Moray LDP will only require minimum, if any, additional housing land to be identified, with a much greater focus on redevelopment of brownfield sites rather than further greenfield releases.

- 4.5 Completions in 2021 were 399 compared with 231 in 2020 (impact of Covid-19 pandemic), 414 in 2019, 358 in 2018 and 350 in 2017. The majority of completions between 2011 and 2021 were in Elgin, Forres and Buckie.
- 4.6 While the overall effective supply of housing 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. However, work at Banff Road (Keith R4) is progressing and discussions are ongoing regarding Speyview (Aberlour R2). The Moray Growth Deal Housing Mix Delivery project will bring further investment to help unlock previously constrained housing land sites.
- 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. The triggers for releasing LONG designations are set out in Policy DP3 *LONG Term Land Reserves* in the MLDP 2020.

5. **SUMMARY OF IMPLICATIONS**

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

The annual HLA 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 HLA is a key requirement of SPP to monitor 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 HLA is part of the workload of the Strategic Planning and Development section.

(f) **Property**

Land at Glassgreen, within Elgin LONG2, includes a site for a future 2.5ha primary school.

(g) **Equalities/Socio Economic Impact**

No Equality Impact Assessment is required for this report.

(h) Climate Change and Biodiversity Impacts

MLDP policies seek to ensure that development proposals reduce carbon emissions and enhance biodiversity. Development proposals are required to provide active travel routes thereby reducing carbon emissions associated with vehicles, create green and blue infrastructure and incorporate and enhance biodiversity through planting and other mechanisms.

National Planning Framework 4 (NPF4) is expected to be approved later in 2022, introducing new national policies to bring significant changes to the planning system including reducing carbon emissions in new development, enhancing biodiversity and a much greater focus on brownfield redevelopment.

Early work has started in the next HNDA, which is led by the Housing Strategy and Development Manager and this will inform the housing land requirements for the next LDP, which will set a target for brownfield redevelopment.

(i) Consultations

The Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Housing Strategy and Development Manager, the Senior Engineer (Transportation), the Equal Opportunities Officer, Paul Connor (Principal Accountant) and Lissa Rowan (Committee Services Officer) 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 HLA to ensure that there is a 5 year effective housing land supply available at all times.**
- 6.2 The HLA 2022 identifies a 13 year effective supply of housing land, with a total 29 years established land supply.**

Author of Report: Darren Westmacott
Planning Officer (Strategic Planning & Development)

Background Papers:
Ref: