

HOUSING



*Milton Brodie, Kinloss by
Acanthus Architects Douglas Forrest*

Introduction

- 4.1 As a major component in the development process, the distribution of land for housing is a key element of the Plan. Therefore, the Plan provides a framework which takes into account the various opportunities and constraints related to population change and movement, employment patterns, the environment and infrastructure and service provision.
- 4.2 In promoting sustainable development the provision of adequate housing is a prerequisite to economic growth and promotion, but it must also minimise impact on the environment and make best use of infrastructure.

National Context

- 4.3 National Planning Policy Guideline 3 (Revised 1996): "Land for Housing", and the accompanying Planning Advice Note 38 (Revised 1996): "Structure Plans: Housing Land Requirements" set out the principal objectives for a structure plan. They are to ensure an adequate and effective range, quality and supply of housing that takes into account infrastructure capacity and other constraints. They require that local community views on the scale of housing proposed, the natural and built environment, and the character of existing settlements are taken into account. The guidance requires that the settlement pattern is efficient with resources and supports urban and rural regeneration. The Plan should provide for affordable housing and promote energy conservation.
- 4.4 In general, the approach to housing is to steer demand to existing settlements, and the Structure Plan aims are:
 - to provide house building opportunities across the area
 - to set standards for new housing in built-up areas and encouraging "brownfield" in preference to "greenfield"
 - to accommodate sensitive development in the countryside
 - to promote the provision of affordable and special needs housing
 - to reduce dependency on residential caravans.

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**Policy S/H1:
Approach to
Housing Development**

New housing development will generally be directed to existing settlements and communities. It will require to be acceptable in terms of its impact on the natural and built environment, and on current or proposed infrastructure capacities.

Figure 8: Housing Shortfall

	Housing Market Requirement		Effective Supply	Shortfall	
	1998-2005	2006-2010	1998	1998 - 2005	2006 - 2010
MORAY	3,380	1,560	2,040	1,340	1,560

HOUSING LAND SUPPLY

Aim: To provide house building opportunities across Moray

Housing Land Supply and Demand

- 4.5 National Policy requires that a five year supply of housing land exists at any one time. In assessing future housing demand and land supply, planning authorities must take account of the views of house-builders and other interests and how and where demand will be met, tailoring supply to local circumstances.
- 4.6 A Housing Market Area is required to assess supply and demand. The Moray housing markets are relatively self-contained, within which estimates of supply and demand can be matched. The Structure Plan seeks to satisfy housing requirements, and to provide flexibility to cope with fluctuations in housing demand.

Demand

- 4.7 The Moray Council undertakes a biennial update of its Strategic Forecasts on employment, population and housing. The 1997 strategic forecasts show a further housing requirement of 4,600 for Moray in the period 1997-2011. These figures are adjusted to fit the Plan Periods. The housing requirements are demand-based in that they are linked to and influenced by forecasts of employment. Therefore, the forecast for the Moray Housing Market Area is a requirement for 2,700 new houses for the period Jan 98-end 2005, with a further 1,250 in the period up to end 2010.

Supply

- 4.8 The Council undertakes an annual audit of the housing land supply within Moray. It seeks input from the house-building industry through the Scottish House-builders Association. The 1998 Audit identifies a total supply of established housing land equivalent to some 2,490 units within Moray. Of the total supply some 160 units are constrained through factors such as lack of servicing or ownership and a further 290 units are subject to the Defence Housing Executive development for the RAF. Therefore, the effective housing land supply in Moray at January 1998 was 2040 units.

Update

The Audit for 2000 (January) has been published. The effective land supply in Moray was 3,067 units, with the established land supply being 3367 units.

Flexibility

4.9 In line with National Planning Policy Guideline 3 (Revised 1996) and Planning Advice Note 38 (Revised 1996) Councils have discretion as to whether to take account of flexibility in housing requirement forecasts. The importance of maintaining the viability of settlements means that a spread of development opportunities is required in the Moray Housing Market Area. This is particularly important in a disparate rural housing market such as Moray. The approach adopted recognises this and additional flexibility is provided based upon a 25% allowance above the gross housing requirement. Housing Figure 8 indicates housing requirement forecasts adjusted to reflect the above provisions.

Brownfield Sites

4.10 There is broad support for the development of infill, redevelopment and gap sites in built up areas (known as 'brownfield' sites). While they generally meet sustainability objectives, there is a need to consider environmental and infrastructure consequences with brownfield development. There should be a clear intention to enhance the urban environment, and avoid over-development or 'town cramming'. Brownfield sites are excluded from the housing allowance calculations.

Shortfall

4.11 Comparing the 1998 effective supply with the forecast requirement (as adjusted by a 25% flexibility) a shortfall of 1350 (rounded up) requires to be met by additional housing allowances up to 2005, and 1560 thereafter. These allowances will enable an ongoing five year supply of land.

4.12 In meeting the housing shortfalls, the land identified as 'constrained' in the 1998 Audit, has, where possible, been brought forward but where it is subject to factors outwith the control of the Authority, it has continued to be excluded from the effective supply. These sites are identified in the Local Plan Town Statements as constrained, with the circumstances under which the site may be made 'effective', explained in the text.

4.13 Where additional land is being brought forward it is on the basis of consideration of infrastructure capacities, the need to avoid the loss of prime quality agricultural land, and other policies within the Structure Plan. The Local Plan brings forward additional land to meet housing shortfalls up to the end of 2005.

Housing Allowances

4.14 In order to maintain the vitality of settlements, a spread of development opportunities is put in place.

4.15 In strategic terms, adequate allowances are ensured in the settlements of Elgin, Forres, Buckie, Keith and Lossiemouth. While housing allowances reflect the likely demand based on recent development trends, in Lossiemouth there is a substantial redevelopment opportunity at Hythehill which will be surplus to RAF requirements following the completion of the Defence



New flats in Buckie by Keith Edmonds Architect



Foundations under preparation for the innovative straw bale house in Findhorn. Edge Architecture and Design.



**Policy S/H2:
Housing Land Supply**

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Housing Executive (DHE) PFI. Housing opportunities in Elgin and other settlements around Lossiemouth provide adequate opportunity for any future housing requirements arising from personnel increases at the bases.

Update

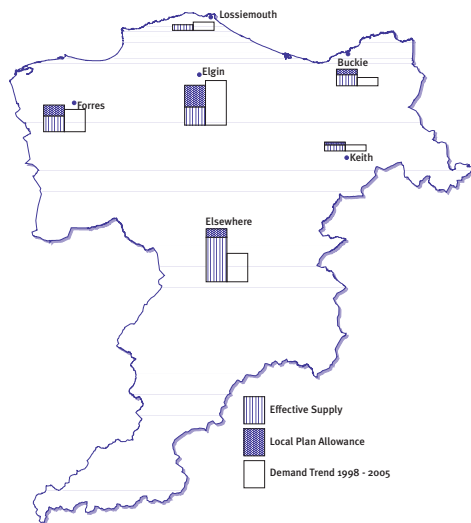
The DHE project was completed in 1999 with the construction of almost 280 new houses in Elgin and Lossiemouth for RAF personnel. Detailed planning consent was granted to Grampian Housing Association for the redevelopment of Hythehill.

4.16 An adequate effective housing land supply exists in most small settlements within Moray however, the Local Plan makes a number of small additions.

Strategic Reserves

4.17 Indicative housing shortfalls between 2005 and end 2010 are identified only for the main town of Elgin and at Alves and they will be reassessed in the next Structure Plan Review. In effect they provide a strategic reserve in the most likely areas, ensuring that the Plan can respond to for example, further relocation of RAF personnel to Moray, and any growth arising from the development of the major business site at Forres.

Figure 9: Housing Land Supply and Demand (Sites)



The Plan seeks to provide a minimum 5 year effective housing land supply at all times in a range of locations across the Council area. It will take account of demand, infrastructure and environmental capacities and in so doing;

- i) The following housing allocations will be identified in the Local Plan in addition to the 1998 effective land supply to meet the housing shortfall up to the end of 2005.

Elgin	700 houses
Forres	300 houses
Buckie	100 houses
Lossiemouth	*
Keith	75 houses
Elsewhere	175 houses
TOTAL	1350 houses

ii) The following housing shortfalls for the period 2006-2010 will be identified indicatively within the Local Plan for long term development. They will be reviewed by the next

Structure Plan Review:

Elgin 500

Alves

* Urban regeneration opportunities will predominate

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Housing Land Supply By Settlement

The Council undertakes annual audits of the Moray housing land supply in conjunction with Scottish Building Employer's Federation and the Scottish House Builders' Association, and the results of that audit will be used to modify the land supply to ensure that the requirements of NPPG3 'Land for Housing' (revised 1996) continue to be met in full.

Settlement	ESTABLISHED SUPPLY FROM JAN 98 AUDIT	CONSTRAINED SUPPLY	EFFECTIVE SUPPLY	STRUCTURE PLAN ALLOWANCE TO 2005	INDICATIVE DEMAND 1998 - 2005 (8 YEARS)	LOCAL PLAN NEW PROPOSALS
Elgin	523	172*	351	700	1104	700
Forres	291	20	271	250	424	300
Buckie	297	80	217	100	168	100
Lossiemouth	218	119*	99	**	160	15
Keith	95	0	95	75	112	75
SUBTOTAL	1424	391	1033	1125	1968	1190
<i>Rest of Moray</i>						
Aberlour	46	0	46		88	37
Cullen	57	0	57		32	0
Dufftown	83	0	83		4	6
Rothies	43	0	43		16	28
Archiestown	1	0	1		4	5
Burghead	146	0	146		64	0
Craigellachie	35	0	35		2	0
Findhorn	72	0	72		32	0
Findochty	54	20	34		24	35
Fochabers	106	0	106		48	0
Garmouth	22	0	22		0	0
Hopeman	84	0	84		48	0
Kinloss	29	0	29		32	0
Lhanbryde	53	0	53		24	0
Mosstodloch	22	0	22		24	20
Newmill	0	0	0			6
Portgordon	30	0	30		8	8
Portknockie	45	35	10		8	0
Rothiemay	0	0	0		8	16
Tomintoul	14	0	14		0	0
Alves	0	0	0		16	0
Cummingston	1	0	1		2	0
Dallas	16	0	16		0	0
Duffus	0	0	0		8	0
Dyke	0	0	0		16	0
Kingston	0	0	0		0	0
Rafford	0	0	0		8	0
Urquhart	3	0	3		56	0
Elsewhere	101	0	101	175	80	0
Sub total	1063	55	1008	175	652	161
TOTAL MORAY	2487	446	2041	1300	2620	1351

Sites are identified in Elgin, and at Alves, to provide a reserve for potential additional future requirements. They will be embargoed from development during the period of the Local Plan unless the Local Authority is convinced that their release is justified. In considering an advanced release the Council will have regard to development rates, levels of demand and supply relative to non-constrained sites, and the availability of or requirements for infrastructure links. These sites are identified in the respective settlement statements as strategic reserves.

NEW HOUSING IN BUILT UP AREAS

Aim: To set standards for new housing in built-up areas and promote "brownfield" development

- 4.18 National Planning Policy Guideline 3 (Revised 1996) indicates that developers may be expected to provide or fund all or most new infrastructure, road improvements and similar requirements, in relation to new housing developments. Contributions will be expected from developers through agreements under planning or other legislation that would enable development to proceed. The Structure Plan policy context is provided by Policy S/F2 in the Funding Section. The Local Plan will identify the areas where such contributions are likely to arise. It will indicate, in general terms, what is expected from prospective developers to enable obstacles to the grant of planning permission to be overcome.
- 4.19 Infrastructure and service capacities are under pressure. This particularly applies in the current situation where local government finance is curtailed and therefore the addition and enhancement of facilities is much slower in coming forward than in previous years. There are particular issues related to secondary education capacity in Forres and Buckie, whilst there are also a number of waste water capacity issues in smaller settlements.
- 4.20 In addition to ensuring that new development fits in to built-up areas, SEPA is advocating that arrangements for drainage be improved and made more sustainable, (known as Sustainable Urban Drainage System), and the Council supports these principles (see Policy S/ENV 8).
- 4.21 The Plan supports the development of infill and brownfield sites which meet sustainability objectives. However there is a need to carefully consider both environmental and infrastructure consequences. There should be a clear intention to enhance the form and quality of the urban environment, with particular care required to avoid over-development or 'cramming'.

New housing will generally be directed to the settlements. Housing fitted in to built-up areas must be acceptable in terms of impact on infrastructure, open space and community facilities, as well as its impact on the surrounding built environment.

**Policy L/H2:
Strategic Reserves
of Housing Land**

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Conversion of upper floor accommodation into flats on Elgin High Street, by Martin Archibald, Architectural and Planning Consultant, Garmouth

**Policy S/H3:
New Housing
in Built-up Areas**

(iii) Landscaping

New housing developments must provide landscaping in accordance with the site description to provide screening, enclosure, shelter, and acoustic barriers and to enhance the overall visual/environmental impact of the development. Details of maintenance arrangements will be required - see policy L/IMP4 'Maintenance of Landscaped and Amenity Areas' in Chapter 8.

(iv) Recreational Space and Community Provision

Housing developments which impact upon the capacities of existing community facilities such as children's play areas, recreational space, or other community services provided by the authority may be subject to Policies L/F1 (Developer Contributions) or L/F2 (Commuted Payments) in order to redress any negative impacts by upgrading existing facilities or through the provision of additional facilities. Recreational space (with equipped children's play areas if necessary) will be required to serve new developments of family sized houses. Guidelines for the provision of recreational space for all types of housing will be prepared by the Council. Redevelopment proposals for existing facilities will be guided by Policy L/CF3.

(v) Energy Conservation

Planning applications and development briefs for developments of 10 or more houses must include a statement on the energy conservation techniques to be incorporated in the layout and design of houses.

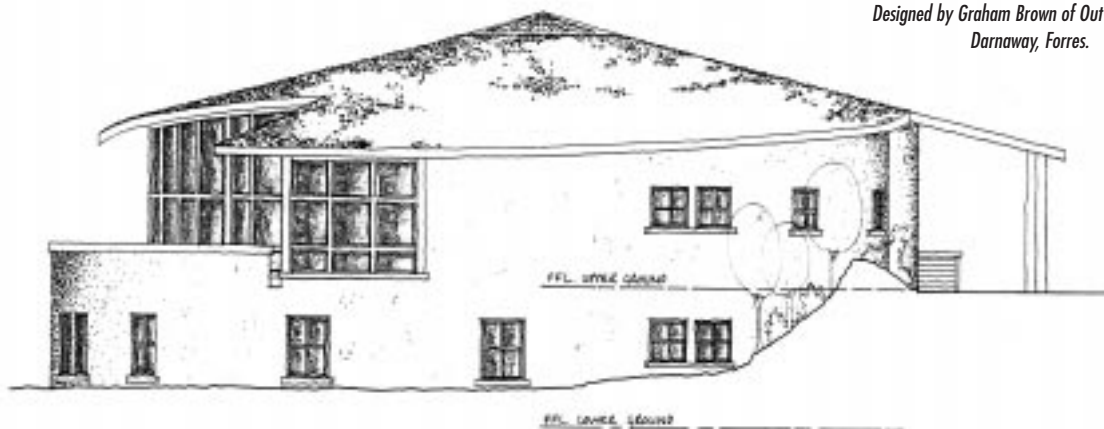
Infill Housing

Where the Structure Plan establishes a general presumption in favour of redevelopment or the filling of gap sites, the Local Plan seeks to ensure that such new brownfield development attains reasonable standards applied to itself and to its impact on immediate surroundings. Amenity can be adversely affected when development impinges on character, privacy, outlook and any other matters that may affect the enjoyment of surrounding land.

The policy for proposals for new houses to be built in existing built up areas is the same as that for any form of new development, and is stated in Policy L/IMP1 'Development in Built-up Areas.' Essentially applications will be assessed on whether they constitute 'good' or 'bad neighbour'.

**Policy L/H3:
Servicing and Layout of new
Housing Developments (cont)**

*Innovative ecological design from
Out of Nowhere at Darnaway.
The reciprocal frame design is patented
by company founder Graham Brown.*



*New house at Plot 2 Minton House, Findhorn.
Designed by Graham Brown of Out of Nowhere,
Darnaway, Forres.*

HOUSING IN THE COUNTRYSIDE

Aim: To Accommodate Sensitive Development in the Countryside

- 4.22 There has been Government advice since 1960 that local authorities should operate a policy which discourages isolated development in the open countryside. The former Grampian Structure Plan (as modified) and The Moray District Local Plan resisted operating a blanket restrictive policy throughout the Moray area in order to assist rural regeneration. The Moray Structure Plan's new policy maintains this approach, but recognises the need for action in areas of low demand and for restraint in areas of high development pressure and environmental sensitivity.
- 4.23 National Planning Policy Guideline 3 (Revised) acknowledges the role of development plans in maintaining the viability of rural communities through supportive policies for new housing in the countryside. The Structure Plan strategy recognises that in remote parts of rural Moray outwith areas of commuter pressure the development of small scale housing is essential in order to sustain communities both socially and economically. In much of the rural area, communities require opportunities for employment and housing if they are to survive. Those who are disadvantaged are particularly affected by the loss of community services and facilities. The 1991 Census has shown that a large number of rural parishes (particularly in southern and eastern Moray), continue to suffer long term population and service decline. A positive planning approach to sustain their viability is required.
- 4.24 The more disadvantaged parts of the rural area often coincide with the most scenic. Within these areas a dispersed pattern of development is also a characteristic of their remoteness. The Structure Plan continues to apply siting and design policies to ensure that there is minimal conflict between development and landscape quality.
- 4.25 The Structure Plan has identified the area to the south and east of Moray where the primary planning objective will be to encourage community regeneration, through a more flexible and enabling development policy focusing opportunities into rural communities and on to existing sites. It also includes more accessible opportunities for the location and siting of the single house in the open countryside.
- 4.26 In areas where there is pressure for development, principally in north and west Moray and along its attractive coastline, there is a need for restraint on new housing. Between the River Spey and the western boundary of the Moray Area, there is persistent pressure for speculative housing, related to the employment market in Elgin, Forres and the Moray Coast. Covering less than a third of Moray, this area is occupied by over 60% of its population and is under pressure from especially housing and recreational development. Here it is a priority to direct housing into the main settlements, and to limit opportunities in the countryside to established rural communities; redevelopment of buildings; and to well located rural sites where natural boundaries already exist.



LDN Architects, Forres

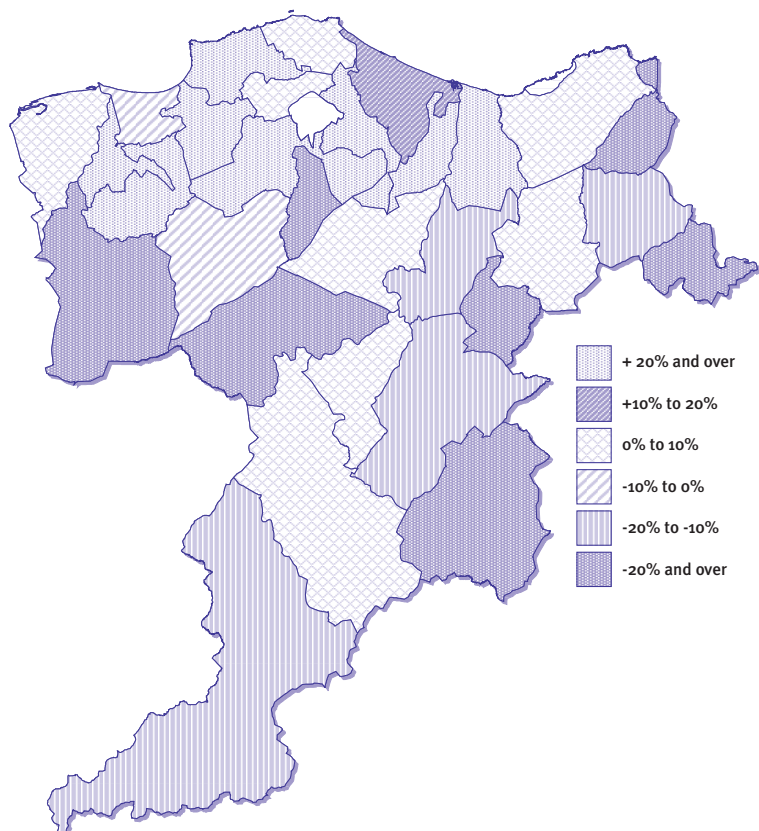


Extended traditional house at Curlusk, Mulben.
LDN Architects, Forres.

This approach is justified not only by the highly productive nature of the land, but by the availability of housing opportunities in the main settlements, the clustered rural settlement pattern in this area, and the need to reduce commuting and service costs.

4.27 Throughout the countryside it is essential that new development achieves high design and siting standards and remains particularly sensitive to areas of scenic and special scientific and nature conservation value.

Figure 10: Population Change by Parish (1981 - 1991)



**Policy S/H4:
House Building
in the Countryside**

In the rural areas in south and east Moray, outwith the Cairngorms National Scenic Area, there will be a presumption in favour of housebuilding:

- i) within rural communities;
 - ii) where it involves the re-use, replacement or rehabilitation of existing buildings;
 - iii) on well located and designed sites in the open countryside,
- In the remaining rural area to the north and west of Moray housing opportunities will be restricted to**
- i) sites within rural communities or,
 - ii) the reuse, replacement, or rehabilitation of existing buildings.
 - iii) well located and designed sites in the open countryside where natural boundaries already exist as set out in Local Plan policy L/HC3.

All such development must conform with the provisions of policy S/IMP1.

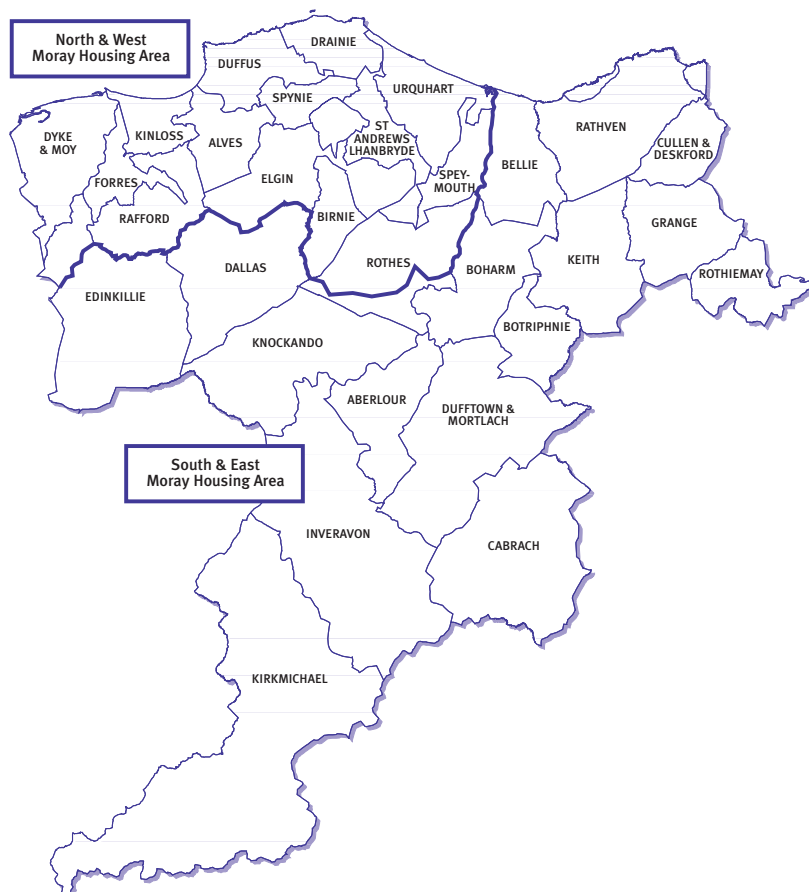
The Strategy

Structure Plan policy S/H4 operates a presumption in favour of housing opportunities within identified rural communities and involving the re-use, conversion or replacement of existing buildings. The policy also allows for the construction of individual new houses but this opportunity is more restricted in the north and west of Moray by more stringent siting and location policies.

The boundaries of these areas are indicated on Plan 2, however the area defined as South and East Moray refers to the majority of Edinkillie parish (to the line of the River Findhorn) and all of the parishes of Dallas, Knockando, Aberlour, part of Rothes, Inveravon, Kirkmichael, Cabrach, Dufftown and Mortlach, Boharm, Botriphnie, Keith, Grange, Rothiemay, Bellie, Rathven, Cullen and Deskford. The area defined as North and West Moray relates to the balance of the parishes of Edinkillie and Rothes (following the line of the Rothes Burn to the Spey), Speymouth, Elgin, Birnie, St. Andrews, Lhanbryde, Urquhart, Drainie, Duffus, Spynie, Kinloss, Rafford and Dyke and Moy.

The Council has produced a detailed planning policy guidance booklet which should be read in conjunction with this and other housing in the countryside policies.

Scottish Natural Heritage have also prepared a Moray Landscape Character Assessment which provides further guidance on locational impact.



*Alterations to Croy House, Pluscarden
by LDN Architects, Forres.*

Option Two Reuse/Replacement

The Council will presume to approve applications for residential development involving the re-use of existing buildings, including existing dwellings, farm steadings, mills, etc. where the renovation of the original building is sensitively designed and is to form the core of the new development. In general, most stone buildings in the countryside will be acceptable for re-use but some buildings, such as cattle sheds, temporary buildings or hill bothies may not be appropriate for re-use or replacement because of visual and environmental impact especially in certain sensitive locations. For the purposes of this policy, "existing buildings" are defined by the accompanying diagram.

In line with the Council's policy on local vernacular buildings (policy L/ENV16) the Council will normally seek restoration of an existing building in preference to demolition and re-development. Where a building is considered to be of some architectural merit locally (e.g. a substantial stone built farm building), and is considered structurally sound for residential use, the Council will resist proposals to replace it, and may insist on renovation and re-development. The Council may refuse a subsequent application if demolition is carried out without prior consultation.

The Council will only accept the principle of replacement of an existing building where there is visible evidence of the structure of the existing building to the equivalent of "level 4" as indicated in Diagram 1, i.e. window sill height - with the full extent and use of the building reasonably established.

Level 4 is defined as a structure which exists at any of the following stages:-

- i) the four walls are complete to at least window sill height - if window sill height cannot be determined, minimum height of all walls should be 700 mm above floor level; or
- ii) any two of the four walls are complete to wall head height; or
- iii) both gables are intact to a minimum height of 2 m above floor level.

Archaeological evidence, excavation, or the production of old maps will not be acceptable as evidence of a derelict site, for the purposes of this policy.

The siting of a new dwelling on a derelict site should be similar to that of the previous building in terms of orientation and distance from the road. Applicants should not presume that approval will be granted for a new dwelling sited at a significant distance from the original building, unless individual site conditions suggest potential improvement. The design of a new house will be subject to Policy L/HC3.

Although this Policy presumes to approve rehabilitation and replacements, there may be locations where re-establishment

L/HC2: Re-Use of Derelict Sites and Existing Buildings



*Bothy renovation at Wester Lawrenceton
by Edge Architecture and Design.
New roof structure of local douglas fir - breathing
roof insulated with "Warmcel" - (blown cellulose
insulation made from re-cycled newsprint).*

establishing additional boundaries which separate the site naturally from the surrounding ground. The remaining boundaries of the site can be formed by natural stone dykes, planting of indigenous hedgerows or groups of trees, by careful mounding of site material to enclose the site. New boundaries should follow the natural form of the land and be designed so as to integrate the proposal within its rural setting (straight lines may not always be appropriate for new boundaries).

Multiple House Sites

Although the Council wishes to enable housing opportunities in the open countryside it is anxious to avoid speculative development of multiple house sites unrelated to local needs and services. The Council will therefore direct this form of development to the identified Rural Communities where community services and facilities may be available and benefit more directly from the arrival of new households.

The Council will not normally approve multiple house applications (i.e. more than two houses) in the open countryside unless they form part of a development which involves the re-use or replacement of existing buildings.

Multiple house applications will be encouraged in the Rural Communities.

Design

New dwellings should be designed to compliment and enhance the local tradition of the countryside and the architectural character of rural communities. 'New Building Design' policy L/IMP3 will apply to all developments.

Detailed planning policy guidance covering siting, design, landscape impact and locational advice is published separately. Applicants are advised to consult this guidance before submitting an application.

For purposes of clarification the Council has adopted the following parameters as definitive guidance on the shape and proportions of gables and roof pitches on conventional new houses to be approved under policy L/IMP2 for the countryside and rural communities. The design of new houses will be assessed under the terms of policy L/IMP3 'New Building Design' in Chapter 8.

The overall width of the gable should not be less than the height of wall from ground to eaves level.

The overall width of a gable shall not be more than 2.5 times the height of wall from ground to eaves level.

The pitch of a roof shall be no less than 40° and no greater than 55°.

Definitions:

Ground - "A fixed external point measured 100 mm below the finished floor level of a house with a solid ground floor or 300 mm below the finished floor level of a house with a suspended ground floor."

Eaves - "The point at which the front face of the external wall and the uppermost point of the roofline intersect."

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L/HC4:

Multiple House Applications in the Countryside

L/HC5:

Gable/Roof Pitch Parameters

Agreement with Scottish Homes. The effects of the Community Care Legislation and the hospital closure programme have increased the pressure on special needs housing, and the demand for private residential homes.

The Council will seek to secure affordable and/or special needs housing within new housing developments by agreement with private developers and housing agencies in areas of need identified by the Community Services Department.

Affordable Housing

Developers should expect to provide an element of affordable housing on any sizeable site designated in the Local Plan for housing, and on any sizeable 'brownfield' or opportunity redevelopment. Town and Village Plans may have identified appropriate sites, but developers should consult with the Community Services Department of the Council to establish local needs. To provide an indication of demand for rented and special needs housing, by housing area, and extract from the Council's database for applications for local authority housing is contained in Appendix 4.

Proposals submitted for housing (on designated or undesignated sites) which are above the threshold for consideration of developer contributions as described in Policy L/F1 (i.e. 10 houses or more), will be assessed for an 'affordable housing' element. The proportion of a site which the Council will expect to be used to satisfy local affordable housing needs will be commensurate with the site size and the specific extent and nature of the local needs for affordable housing.

The Council will endeavour to provide affordable housing so that the benefits are passed on to serve the community in future years. The range of mechanisms under which this will be achieved may include but not be limited to:-

- i) that part of the site or development proposed for affordable housing use being transferred to the Council, Scottish Homes or a similar management body;**
- ii) through the use of planning agreements and conditions; and**
- iii) a partnership, joint venture and or other innovative arrangement between developers and the Housing Authority.**

The Council's Community Services Department, is to produce detailed guidance on the implementation of these mechanisms.

Special Needs Housing

In accordance with the objectives of securing housing for special sectors of the population, as outlined in the strategies of the Structure Plan, the Housing Plan and the Community Care Plan, appropriate locations for mixed and specialist housing uses are specifically designated in Town and Village Maps.

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**Policy S/H5:
Affordable and Special
Needs Housing**



**Policy L/H7:
Affordable
Housing Provision**

RESIDENTIAL CARAVANS

Aim: To reduce dependency on caravans as permanent homes

- 4.31 While special arrangements may be made to accommodate temporary use of caravans, for full-time residence, and travelling people, those for use as permanent homes do not normally provide a satisfactory living environment and are therefore not encouraged.
- 4.32 Within Moray almost 300 residential caravans continue in use. It is a strategic objective to reduce the areas dependency on caravans for permanent housing.

Proposals to replace residential caravans, or to redevelop existing sites, will be encouraged as set out in Local Plan policy L/H10.

In attempting to achieve the Structure Plan aim of reducing the area's dependency on residential caravan accommodation the Council will aim to encourage the conversion of the five main residential caravan sites at Mundole, Seapark, Findhorn, Sheriffmill and Ashgrove for either holiday accommodation or redevelopment for permanent dwellings.

The Housing Plan makes provision for progressive replacement of residential caravans over a 5 year period. While this should remain an objective, it is also important to prevent any increase in new residential caravans, or caravan sites. The Plans for Kinloss, Findhorn and Elgin identify the sites.

No new residential caravan sites (except for a new caravan on the basis of temporary necessity) nor any extension to an existing site, nor any permanent extension to an existing residential caravan, will be permitted. Applications to redevelop the sites at Mundole, Kinloss, Findhorn and Sheriffmill for holiday accommodation will be favourably considered; the sites at Kinloss, Sheriffmill and Ashgrove will also be favourably considered for permanent dwellings on the basis of at maximum a one-for-one replacement. The Council will seek the assistance of Scottish Homes for any schemes involving the total replacement of any of the above five residential sites, in order to offer suitable re-housing opportunities.

For the purposes of this policy 'temporary necessity' will normally apply only to emergency situations where re-housing is urgently required as a result of unforeseen circumstances such as fire, flood or storm damage to a principal residence or for a fixed time period relating to the on site construction of a new house.

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**Policy S/H6:
Residential Caravans**

**Policy L/H10:
Residential
Caravans and Sites**
