

### **INTRODUCTION**

#### Introduction

This paper is one of a number of core background papers prepared to support the Moray Local Development Plan 2020.

The paper sets out the background and evidence base for the development of a revised policy approach for the delivery of high quality rural housing.

#### **National Policy Context**

Scottish Planning Policy (SPP) seeks to promote a pattern of development that is appropriate to the character of an area, the challenges it faces and a policy approach tailored to local circumstances. Policies should protect against the growth of unsustainable car based commuting and the suburbanisation of the countryside and most new development should be guided to locations within or adjacent to settlements.

#### Moray 2026 - A Plan for the Future

Moray 2026 seeks to promote Moray as an area of diverse natural beauty where people choose to live, learn, work and enjoy. The provision of high quality rural housing that does not impact on our landscape, promotes sustainable growth and helps provide a choice of housing options is considered to contribute to achieving this ambition.

#### **Context**

Moray has experienced a significant level of housebuilding in the open countryside, particularly around Elgin, Forres and Buckie. The current housing in the countryside policy is relatively permissive and the criteria set out within it easy to achieve. As a result a significant number of houses in the countryside have been permitted and constructed.

The current housing in the countryside policy and supporting supplementary guidance sets out design criteria. Design is a key aspect of the impact of a new development in a given location. The current design criteria are not delivering the quality of design expected.

Key issues with the current policy have been identified based on work undertaken in preparing the rural groupings review, cumulative build up guidance note and experience from the Moray Local Review Body. A number of presentations have been given to Elected Members, raising awareness of housing in the countryside issues.

An Elected Member session was held in December 2016, the outcome of which was agreement to formulate a policy approach to address the key challenges set out below.

- Reinforcing the settlement hierarchy by directing development to rural groupings.
- Addressing the unsustainable pattern of growth.
- Addressing the landscape and visual impacts associated with the cumulative build-up of houses in the countryside.
- Raising standards of rural design.

These issues cannot be addressed through a minor amendment of the current policy. Instead a comprehensive review of the policy and understanding of the reasons underlying the identified issues was required. A working group of Development Management and Development Plan officers was set up to formulate a revised policy position.





#### **Reinforcing the Settlement Hierarchy**

The settlement hierarchy is not operating as intended, in particular in the rural context. The spatial strategy set out within the current LDP seeks to direct development to the main towns, smaller towns and villages, rural groupings and lastly to locations in the open countryside. What is actually happening, as evidenced by the statistics below, is that there are more houses in the countryside completed each year, than there are houses built in all of the third tier settlements combined (this is all towns and villages with the exception of Elgin, Buckie, Forres, Keith and Lossiemouth).

Rural groupings are performing poorly and are not accommodating the majority of rural development as envisaged. The effect of this is evident in areas like Speyside where there has been a significant number of houses in the countryside approved, with little or no development on designated sites within the towns and villages.

Rafford is an example of an area that has experienced significant levels of housing in the open countryside but the designated site within the village remains undeveloped.

In order to try and rectify this, it is proposed to reinforce the settlement hierarchy. To assist in achieving this, it is proposed to merge the current rural groupings, re-use and replacement and housing in the open countryside policies into a single rural housing policy. This policy will explicitly set out the hierarchy for development in rural areas, with housing in the countryside accommodating only a small proportion of development and the majority of development being directed to rural groupings. This is discussed in more detail later.

	Average annual completions (2009-2015)
Elgin	146
Forres, Keith, Buckie and Lossiemouth	119
Aberlour, Alves, Archiestown, Burghead, Craigellachie, Cullen, Cummingston, Dallas, Dufftown, Duffus, Dyke, Findhorn, Findochty, Fochabers, Garmouth, Hopeman, Kingston, Kinloss, Lhanbryde, Mosstodloch, Newmill, Portgordon, Portknockie, Rafford, Rothes, Rothiemay, Urquhart	34
Rural Groupings (i.e. Brodie, Upper Dallachy)	10
Houses in the Open Countryside	42



#### Unsustainable pattern of growth

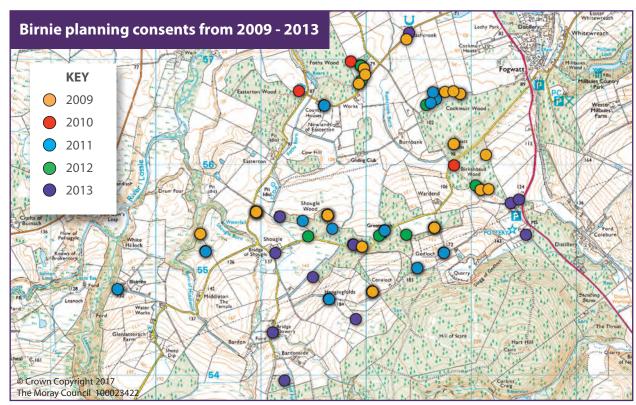
There is a clear relationship between the current permissive policy and the creation of identifiable areas of cumulative build-up of houses in the countryside in specific areas across Moray. Mapping for the Birnie area close to Elgin evidences this with 55 planning consents for new housing in a 5 year period.

Birnie is an identified hotspot in the current Housing in the Countryside Supplementary Guidance where there has been a significant growth in the number of new houses. Development in this location promotes an unsustainable pattern of growth based on commuting to access work, leisure and services. It has also led to the suburbanisation of areas in the countryside and this is discussed in more detail in a separate section.

There is a resource implication for the Council related to delivery of services including waste collection, school transport and homecare provision. The continuation of this unsustainable growth pattern as opposed to directing development to existing groupings and clusters will inevitably increase the costs associated with service delivery.

It has not been possible to attribute costs associated with this, however it is acknowledged that there will inevitably be an impact i.e. increased journeys, additional demand in rural locations and an inability to complete defined routes within allotted times.

Reinforcing the settlement hierarchy will assist in directing development to groupings. It is accepted however that work needs to be undertaken to identify and address issues that are preventing sites in rural groupings from coming forward for development. In addition to this it is proposed to identify more rural groupings to direct development to. This is especially important in areas identified as development hotspots where there is obvious market demand for rural plots. It is therefore proposed to create development opportunities within areas of high demand like Birnie and Rafford through the identification of more rural groupings. At present there are 80 rural groupings and an additional 8 rural groupings are proposed.





#### **Re-use and Replacement**

The reuse and replacement policy also forms an important element of the hierarchy. It is proposed to revise the policy based on experience of issues encountered trying to implement it. It is expected that reinforcing the settlement hierarchy will create pressure on the reuse and replacement of existing buildings and the revised policy needs to be able to respond to this. In particular there is a need to avoid the creation of suburban style cul-de-sacs that are out of scale and character with the rural setting.



# Landscape and visual impacts associated with cumulative build-up of housing in the countryside

As already mentioned there are identifiable hotspots of development across Moray, where there is an unacceptable cumulative build-up of housing in the countryside. It was decided that this was an issue that needed to be addressed in the short term and in advance of a new policy being developed. On that basis a Guidance Note on the Landscape and Visual Impacts of Cumulative Build up of Housing in the Countryside has been prepared.

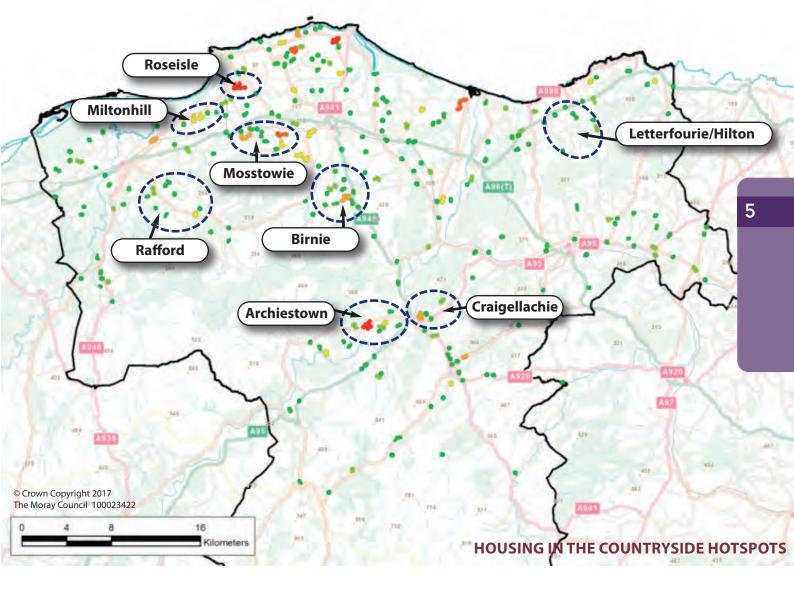
The guidance note focuses on 8 study areas across Moray where cumulative build-up of housing is most pronounced. A landscape report was commissioned to support the preparation of the guidance note. The landscape report identified in some areas the density and increased size of new houses has resulted in them being a prominent feature and overwhelming other landscape features. Significant change has occurred in the traditional settlement pattern and its setting. In some locations new houses are so numerous and prominent they have imposed a more suburban character in the countryside.





The degree of cumulative build up has resulted in the landscape being changed so much that in some areas of Moray the rural environment can no longer be described as being of high quality. The guidance note offers an interim solution to try and control continued build up in specific locations but it is acknowledged that new areas of build-up are continuing to emerge.





The guidance note also contains cumulative build up indicators and these are based on the conditions that presented themselves at the 8 study areas. It has become apparent that there are different types of build up across Moray, including sequential build up when travelling through an area, a concentration of new houses in an area that overwhelms traditional buildings and concentrated development that creates suburbanised cul-de-sacs. The conditions for build-up differ depending on the characteristics of a particular location and it has not been possible to provide a singular definition of what constitutes unacceptable build up.

In an effort to address unacceptable cumulative build up, a spatial approach is proposed based upon the principles in Scottish Planning Policy (SPP). There are identified pressurised areas proposed where new houses in the countryside will be restricted and areas of intermediate pressure where stricter criteria than the current policy will be applied to direct development to appropriate sites.

The purpose of this approach is to direct new housing in the open countryside to the least environmentally sensitive locations in Moray. The siting criteria have been revised to have a sharper focus on containment/backdrop/enclosure and to ensure that sites integrate sensitively into the landscape. This approach should reduce the number of plots being approved and reinforce the settlement hierarchy.



#### Raising standards of rural design

Identified design issues include the increasing size of houses, the form and proportion of building elements, choice of materials and the excessive use of glazing.

The simplest way to reduce impact is to minimise the scale of the house and on this basis it is proposed to limit the height of new houses to 6.75 metres. It has been established that this height will comfortably accommodate a 1.5 storey property. The height restriction when combined with the gable pitch formula will prevent houses being artificially raised to comply with the policy. Architects/designers have used this technique and this has resulted in an increase in the overall height of the dwellings and inevitably impact. The intention is to achieve simple well-proportioned traditional building forms.

Materials are important and within the revised design criteria it is proposed to achieve appropriate finishes, by specifying the use of natural slate, the avoidance of decorative stone and limiting materials to no more than 2 primary finishes (i.e. timber and wet dash harl). Detailing also influences appearance of houses and the revised criteria will make explicit reference to the avoidance of excessive glazing, horizontal windows and inappropriate suburban detailing.

To support raising design standards a number of good examples of rural design have been identified and it is proposed to create an online resource of good practice.

Exceptions to the design criteria have moved away from reference to justification based on innovative design and instead set out criteria that must be met as follows.

Exceptions to design criteria must be based upon a design that is an exemplar in terms of architecture, the use of materials, methods of sustainable construction and a design which responds to the setting. Proposals must be supported by a design statement setting out why an exception to the design criteria is warranted.









#### Conclusion

The draft rural housing policy has been formulated to address the identified challenges affecting new housing in the countryside. This policy involves the merger of the current rural groupings, reuse and replacement and new housing in the open countryside policies and supporting supplementary guidance. It is proposed to significantly reduce the content of the supplementary guidance and focus on key issues which will be embedded in the Local Development Plan itself.

It is proposed to tighten the rural housing policy to reinforce the settlement hierarchy by directing new development to rural groupings in the first instance, followed by reuse and replacement and lastly to sites in the open countryside.

This approach will promote a more sustainable pattern of growth and seek to limit the suburbanisation of the countryside. The siting criteria are intended to ensure that sites have appropriate backdrop and enclosure to provide containment and ensure new houses can fit sensitively into the landscape. Finally, the design criteria promotes simple traditional forms of housing with a palette of appropriate materials and the avoidance of excessive detailing.



## LDP2020 OUTCOME

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Key Issues	Assessment	Outcomes for LDP 2020
Reinforcing the settlement hierarchy	Rural housing is not being directed to rural groupings as intended. There has been a significant growth in the number of new houses in the open countryside in specific areas of Moray. This has led to an unsustainable pattern of growth and increase in car based commuting. These identifiable areas of cumulative build-up are also creating significant adverse landscape and visual impacts.	Identify pressurised areas where further housing development will be restricted.  Reinforce settlement hierarchy to direct the majority of new rural housing to rural groupings.  Identify new groupings around existing clusters within pressurised areas to direct development to more appropriate locations and promote sustainable growth.  Investigate why sites in rural grouping are not coming forward for development.
Landscape and visual impacts due to cumulative build up	The current policy is not always delivering houses that sit sensitively in the landscape.	Set out more stringent requirements for containment/backdrop/enclosure to ensure development integrates sensitively.
Raising siting and design standards	Some houses are suburban in appearance, increasing in scale and have excessive glazing.	Revise design criteria specifying new development "must" as opposed to "should" to deliver traditional well-proportioned, simple designs with high quality materials.





