

Issue 1	Vision, Spatial Strategy and Strategic Requirements	
Development plan reference:	<p>Vision (Volume 1, page 7)</p> <p>Spatial Strategy (Volume 1, pages 8-11)</p> <p>Strategic Context (Volume 1, pages 12-17)</p>	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Springfield Properties plc (10)</p> <p>Barratt North Scotland (15)</p> <p>NHS Grampian (300)</p> <p>Scottish Government (490)</p> <p>Crown Estate Scotland (861)</p> <p>Homes for Scotland (1035)</p> <p>Fred Olsen Renewables Ltd (1047)</p> <p>Christopher Moran Energy Ltd (2178)</p> <p>Airvolution Clean Energy (ACE) (2186)</p> <p>Dean Anderson (2204)</p>		
Provision of the development plan to which the issue relates:	<p>Vision- Volume 1 page 7</p> <p>Spatial Strategy- Volume 1 pages 8-11</p> <p>Housing Land Requirement- Volume 1 pages 12-14</p>	
Planning authority's summary of the representation(s):		
<p>Vision</p> <p><u>Fred Olsen Renewables Ltd (1047/3/1), Christopher Moran Energy Ltd (2178/1/1)</u></p> <p>Disappointing that there is no specific reference to the need to encourage renewable energy development, given the very significant support at Scottish Government level for further renewable energy development, in particular onshore wind energy and other technologies.</p> <p>Refer to other LDP's e.g. Dumfries and Galloway vision includes "a range of renewable energy developments" and Scottish Borders "encouraging renewable energy is seen to be a key part of the Government response to climate change and this supports the emphasis towards a low carbon economy" and a key aspiration is "the development of the area's full potential of electricity and heat from renewable sources, in line with national climate</p>		

change targets....” Proposed Plan is silent on this topic, which is unacceptable.

Airvolution Clean Energy (2186/1/1)

Concerned about the absence of reference to the presumption in favour of development that contributes to sustainable development” as set out on page 9 of Scottish Planning Policy. The Vision should refer to this presumption for the benefit of all stakeholders and subsequent decision making.

NHS Grampian (300/6/1)

NHS Grampian welcomes the placemaking approach and the inclusion of Healthcare infrastructure which is a fundamental component of a community which is reflected throughout the Plan.

Spatial Strategy

Barratt North Scotland (15/1/1)

Supports the Council’s Growth Strategy, with a focus on delivering existing designated sites which are in the development process or have stalled in tertiary areas.

NHS Grampian (300/6/1)

Support the Strategy and proposed changes to Lossiemouth and Keith from secondary to Tertiary Growth areas. Welcome the placemaking tool and inclusion of healthier living and wellbeing.

Crown Estate Scotland (CES) (861/6/7)

Object to non-inclusion of Mosstodloch and Fochabers as a tertiary or joint tertiary growth centre to deliver growth over the LDP period and beyond. CES has put forward 75 ha additional land for employment and mixed use at Mosstodloch and has development land at Fochabers, which are potential “game- changers” for the settlement.

Fred Olsen Renewables Ltd (1047/3/1), Christopher Moran Energy Ltd (2178/1/1)

The rural area is entirely empty of any indication of opportunities. This is a missed opportunity to identify the scope offered in Moray’s rural areas for renewable energy development, in particular onshore wind. If offshore is identified then why not onshore?

Springfield Properties plc (10/13/24)

Housing Land Distribution

Representation seeks designation of additional land for housing in Hopeman (see schedule 9).

Consider the distribution of housing land has not always ensured the most effective match between the distribution of sites and locations where there are opportunities for development to promote growth;

- It is contradictory to promote growth outside of Elgin but expect it to be delivered by

settlements in the hierarchy, which are constrained, or with low potential to deliver growth.

- Fochabers is the only other settlement in the Elgin Housing Market Area identified for any real level of growth. All the settlements in the tertiary growth tier Keith, Fochabers and Aberlour are recognised as having existing housing designations which will involve exploring how to overcome constraints on sites to take them forward because the designations are not considered by SPL to be credible, effective land.
- Hopeman is well placed within Elgin Housing Market Area and capable of delivering such growth.
- Consideration should also be given to the role that expansion of existing settlements can play in providing a solution, which would be more sustainable and achievable. The scale of the issue to be addressed does not immediately appear to justify the response of a new settlement. This approach is consistent with Scottish Planning Policy where development should generally be guided to locations within or adjacent to settlements and also with the preferred option for the growth strategy in the Main Issues Report to support existing services and communities outwith Elgin.
- Despite the importance of Lossiemouth, in terms of the spatial strategy, its size, level of services and employment, it is significantly constrained due to noise levels associated with the RAF base. The diminished role of Lossiemouth in the settlement strategy leaves a large gap to be filled, as it is one of the region's main service and employment centres outwith Elgin. A new settlement on the A96 corridor would not be well-located for access to the town. Hopeman could once again play an enhanced role in the proposed settlement strategy.
- The growth strategy states that new development in the smaller towns and villages (4th tier in hierarchy) "will be proportionate to their size and provision of services and facilities". However this approach is not consistent with the relationship of Hopeman to other settlements in the 4th tier of the hierarchy.
- Hopeman has sufficient capacity for a higher level of growth than is currently allocated to it, whilst several other settlements have seemingly high numbers of allocated sites that seem to be constrained and have no commercial marketability with no developer interest.
- The case for looking at Hopeman to accommodate growth is stronger in the context of the Elgin Local Housing Market Area where sites at Lhanbryde, Burghead, Mosstodloch and Lossiemouth are long standing designations, stalled sites, constrained due to marketability or have low completion rates.

Dean Anderson (2204/2/2)

Representation seeks designation of additional land for housing in Duffus (see Schedule 9).

- The proposed strategy will result in a perpetuation of the current pattern of growth and it is considered a more forward looking approach should be adopted which recognises the likely future demands for housing, as a result of anticipated investment and development in Moray, taking account of expansion at RAF

Lossiemouth and Kinloss Barracks becoming home to another army battalion.

- The spatial strategy should be reconsidered to reflect the real changes which are expected. Whilst constraints may prevent Lossiemouth from widespread expansion, smaller settlements within the vicinity would be able to accommodate growth to cater for demand. Duffus is not named within the Spatial Strategy and it is suggested that it be added to Smaller Towns and Villages. This would then facilitate an expansion to this settlement.

Strategic Context

NHS Grampian (300/6/1)

NHS Grampian will require a more flexible approach to infrastructure requirements to accommodate future service delivery. Rather than extending existing premises or providing new, NHS Grampian may wish to consider an alternative approach in some areas with care and treatment services being delivered in alternative locations. Table 5 Healthcare Infrastructure confirms the requirements are generally in line with information provided to the Council, however the works to increase capacity at Rothes are now complete, with works at Aberlour ongoing and due to complete May 2019.

Barratt North Scotland (15/1/1)

Housing Land Requirement. Barratt support addition of a 30% generosity allowance onto the baseline HNDA figure to calculate the housing land requirement.

Scottish Government (490/4/1)

The Plan should set out the Housing Supply Target, separated into affordable and market sector to accord with Para 120 of SPP.

Homes for Scotland (1035/9/1)

Homes for Scotland support the Council's chosen 30% generosity margin added to the housing supply target to reach its housing land requirement.

Terminology within the Proposed Plan (page 14) is confusing. Assume that the "annual housing completion target" is the Housing Supply Target as defined in Scottish Planning Policy and that the "annual average housing supply target" is the Housing Land Requirement from SPP.

Springfield Properties plc (10/13/24)

A Housing Review (RD03) has been prepared to support this objection and sets out that a significant amount of allocated sites in the Moray Local Development Plan (MLDP) 2020 are constrained due to marketability and other factors and cannot be relied upon to contribute to the land supply. Many of these sites are located in weak market areas where there is little or no real demand for new housing in significant numbers. These legacy sites have not been delivered and are being rolled forward from one plan to the next without deliverability being properly examined.

Request that these sites are removed and state that Hopeman HP4 is well placed to

accommodate a proportion of the land supply in a revised growth strategy, in a viable, sustainable and well-located settlement that has good infrastructure capacity within the Elgin Housing Market Area.

This representation seeks to make more effective use of land, which is part of the established land supply but has not come forward for development through successive Development Plans.

Contend that a number of non-effective stalled sites are not contributing to the land supply requirements for Moray. A total of 42 sites and 2,209 plots are constrained, owing to marketability and other factors and therefore will not contribute to the effective land supply. A redistribution of a small part of this housing land to Hopeman from within such a large capacity would not undermine the settlement hierarchy whilst at the same time directing an allocation to a location which can deliver viable, marketable and sustainable growth.

A total of 42 sites with capacity for 1,184 homes are identified as being constrained due to marketability in the 2018 Housing Land Audit (HLA), approximately 9% of the established housing land supply. This shows a substantial mismatch between the location of housing land designations and those readily capable of promoting marketable growth to support the proposed growth strategy for the LDP 2020.

A number of sites (587 homes) have been in successive Development Plans and have not come forward. Many of these designations were promoted speculatively and were not housebuilder led and there has been little housebuilder interest in taking them forward. The 2018 Housing Land Audit (HLA) constrains all of these sites on marketability grounds, therefore they could reasonably be assumed to not be capable of being brought forward and contributing to the effective land supply.

The Main Issues Report responses suggested that sites included within the Proposed Plan have been subject to detailed scrutiny regarding their effectiveness, reflecting aspirations for delivery set out in the emerging reforms to the planning system. This is strongly refuted, as SPL consider it is clear to see that a large number of constrained sites have been taken forward from successive plans.

The Proposed Plan continues to promote a range of constrained sites that ultimately fail to contribute to the effective land supply. In the Housing Land Audit 2018 (HLA) 9,210 units are constrained, approximately 3,433 of these are constrained predominately for marketability/physical reasons, but with the balance of this 5,777 being LONG land within a total established supply of 12,848. Many of these sites have been brought into the LDP 2020 and will continue to stagnate and require LONG land to be brought forward to deliver sufficient number of homes.

LONG Sites

LONG sites have been brought forward into the MLDP2020 such as Hopeman R1 Manse Road, R2/R4 Fochabers, R9 Keith where the existing allocated sites themselves are yet to be commenced. Some indication of progress should be required to support this.

The initial phase at R1 Manse Road Hopeman has not progressed, despite this a further area of the site has been released. Lochyhill in Forres is a significant release allocated since 2008, with a capacity for 850 units and an additional area of LONG. It has not progressed and development stalled in 2009 when the developer withdrew from the site, despite putting a Masterplan in place for part of the site

The continued focus of the bulk of development for Moray, 1200 additional units in the Elgin Housing Market Area, predominantly within Elgin itself will serve to apply significant pressure to its already strained infrastructure, transport networks and facilities. An approach where alternative locations are considered, with more dispersal of housing sites outwith Elgin but within its Housing Market Area is promoted.

Viability

At the time of submitting Call for Sites bids, further viability information was sought by the Council regarding effectiveness/viability testing in relation to sites. At Main Issues Report (MIR) a number of existing and potential sites were being identified as requiring further information to demonstrate effectiveness/viability. Despite this intention this was never put in place. Therefore, viability and deliverability of these sites has not been verified.

The significant increase in Developer Obligations in Moray has probably further jeopardised the viability of these sites. Remain concerned continuously ineffective sites are indicative of a wider failing to promote sites in a range of locations where there remains a buoyant and commercial market for new homes.

R1 Manse Road, Hopeman

The Proposed Plan states that R1 Manse Road is effective and programmed for commencement in 2019. To date no proposals have been forthcoming in the form of a Proposal of Application Notice (PAN) or pre-application enquiry despite its allocation in the MLDP2015. Given historic landfill gas emission issues, it is a valid concern whether this site is both commercially developable and safe to do so. There is a question over whether the site is deliverable. Even if developed it does not appear that R1 Manse Road will make any significant contribution to the growth strategy over the term of the LDP2020. Furthermore, there is a lack of explanation as to why an additional area of LONG land is to be released when no clear indicators of the site progressing have occurred.

Dean Anderson (2204/2/2)

There is a large reliance on existing sites and given the lack of progress which has been made in the delivery of these units during the current lifetime of the plan there must be a danger that these sites are not viable or deliverable, thereby constraining the housing land supply. The Council has attempted to avoid this scenario by the introduction of policies requiring annual delivery strategy/updates and compulsory purchase to assist sites in being developed. This is laudable however it must be recognised there are few examples of compulsory purchase powers being successfully used to unlock housing sites and accelerate the delivery of housing units. A more effective method would be to allocate more sites to broaden the range for developers. A range of sites including the one at Duffus (see schedule 9) could be allocated.

Modifications sought by those submitting representations:

Vision

Fred Olsen Renewables Ltd (1047/3/1), Christopher Moran Energy Ltd (2178/1/1)

Vision, aims and objectives to be amended to reflect the current intensification of policy support for renewable energy development since SPP was published in 2014.

Airvolution Clean Energy (ACE) (2186/1/2)

Vision to refer to the presumption in favour of development that contributes to sustainable development” as set out on page 9 of Scottish Planning Policy.

NHS Grampian (300/6/1)

No change sought.

Spatial Strategy

Barratt North Scotland (15/1/1)

No change sought.

NHS Grampian (300/6/1)

No change sought.

Crown Estate Scotland (CES) (861/6/7)

Mosstodloch and Fochabers should be listed as a tertiary growth centre, whether standalone or combined with Fochabers.

Fred Olsen Renewables Ltd (1047/3/1), Christopher Moran Energy Ltd (2178/1/1)

Spatial strategy to indicate opportunities for onshore wind energy development.

Springfield Properties plc (10/13/24)

Identification of additional growth in Elgin Local Housing Market Area, specifically Hopeman.

Dean Anderson (2204/2/2)

Identification of additional growth in Elgin Local Housing Market Area, specifically Duffus.

Strategic Context

NHS Grampian (300/6/1)

Amend Table 5 Healthcare Infrastructure to reflect works to increase capacity at Rothes is now complete, with works at Aberlour due to complete in May 2019.

Scottish Government (490/4/1)

Plan to set out the Housing Supply Target, separated into affordable and market sector.

Homes for Scotland (1035/9/001)

Amend terminology to be more consistent with Scottish Planning Policy, annual housing completion target should be Housing Supply Target and the annual average housing

supply target is the Housing Land Requirement.

Springfield Properties plc (10/13/24)

Identification of additional growth in Elgin Local Housing Market Area, specifically Hopeman

Dean Anderson (2204/2/2))

Identification of additional growth in Elgin Local Housing Market Area, specifically Duffus.

Summary of responses (including reasons) by planning authority:

Vision

Fred Olsen Renewables Ltd (1047/3/1), Christopher Moran Energy Ltd (2178/1/1), Airvolution Clean Energy (ACE) (2186/1/1)

While not specifically stating “renewable energy”, the Council considers that the Vision set out on page 7 of the Proposed Plan (CD01) provides several positive statements regarding sustainable development in support of Scottish Planning Policy to support the right development in the right place, including;

- Bullet point 1 refers to creating “sustainable, welcoming, well connected and distinctive places.....”
- Bullet point 4 refers to “identify and provide for new or upgraded social and physical infrastructure to support the expanding population....”
- Bullet point 6 refers to “.....and promote low carbon and sustainable development.”
- Bullet point 8 refers to “improve resilience of the natural and built environment to climate change”.

The Council’s position on renewable energy is clearly set out in Policy DP9. The Vision sets out broad principles and it is not considered necessary or appropriate to set out in detail all technologies, businesses or scenarios for development which are more appropriately covered by individual, and more detailed policies in support of Scottish Planning Policy.

No modification is proposed.

NHS Grampian (300/6/1)

Support noted.

Spatial Strategy

Barratt North Scotland (15/1/1), NHS Grampian (300/6/1)

Support noted.

Crown Estate Scotland (CES) (861/6/7)

Development rates in Mosstodloch have historically been very low. However, a planning

application for a first phase of 30 affordable homes has recently been approved, with construction planned to commence in 2019/20 financial year. The preferred route of the A96 dualling has been published, which will run immediately south and in close proximity to Mosstodloch and immediately north of Fochabers and given the existing services and scale of new land releases identified in the Proposed Plan, there is some merit in identifying Mosstodloch and Fochabers as tertiary centres forming a Growth area in the spatial strategy diagram and associated text, with plans added in the section identifying growth areas (page 9 of Proposed Plan). Mosstodloch and to a lesser extent Fochabers also has longer term growth opportunities beyond the Plan period.

If the Reporter is so minded, the Council would have no objection to the modification as outlined above, to include Mosstodloch and Fochabers as tertiary centres forming a Growth area in the Spatial Strategy and associated text.

Fred Olsen Renewables Ltd (1047/3/1), Christopher Moran Energy Ltd (2178/1/1)

The reference to offshore wind on the Spatial Strategy diagram of the Proposed Plan (Vol 1, page 11) is to highlight the potential opportunities at Buckie harbour for operation and maintenance related activities to support offshore wind energy.

It is not considered necessary or appropriate to identify onshore wind opportunities on page 11, when there is a specific spatial framework and more detailed policy guidance maps on pages 63, 65, 67 and 69 of Volume 1. Policy ED9 provides a positive framework for considering a wide range of renewable energy technologies, not just onshore wind.

No modification is proposed.

Springfield Properties plc (10/13/24), Dean Anderson (2204/2/2)

Spatial Strategy

Historically the spatial strategy in Moray has revolved around concentrating development in the primary centre of Elgin, with secondary centres of Forres, Buckie, Keith and Lossiemouth, with some growth in smaller towns, villages and Rural Groupings and no growth in some towns, villages and Rural groupings because of constraints or sensitivities such as historic character, flooding, limited services or access restrictions.

However, while an excellent effective housing land supply is available in Elgin, Forres and Buckie, opportunities in Lossiemouth beyond the consented development at Sunbank (278 units) are limited and in Keith, despite several designated housing sites, growth and interest in developing in the town are limited, with only the site for affordable housing at Banff Road showing signs of progressing since adoption of the Moray Local Development Plan 2015.

To address the need for a slightly different approach to the Spatial Strategy, the Topic Paper on Housing Land, Policies and Creating Quality Places (CD28 page 8), which was published in support of the Main Issues Report in January 2018 proposed that the Spatial Strategy for housing land be to;

- Reinforce and strengthen the primary role of Elgin in the settlement hierarchy, followed by Forres and Buckie, with growth areas at Aberlour and Fochabers promoted through the Plan period. Aberlour and Fochabers are viable local centres

with a range of services and facilities, including secondary schools and while growth to date has been slow, the Plan will aim to deliver development in these centres.

- Address a lack of effective housing sites in the Keith and Speyside LHMA's by exploring alternative approaches to delivery, including a more restrictive housing in the countryside policy.

The smaller settlements are expected to grow in proportion to their current size and land designations have been made at smaller, proportionate levels and in accordance with existing supply, previous development rates etc. However, some towns and villages have been proposed for no, or very limited growth, due to infrastructure capacity, environmental or character issues.”

The objections by Springfield Properties plc and Dean Anderson should be read in conjunction with their settlement specific objections seeking land designations for housing development in Hopeman and Duffus (see schedule 9).

Following consultation on the Main Issues Report, the approach to the Spatial Strategy was included in the Proposed Plan (CD01 page 8) with Primary, Secondary and Tertiary Growth areas expected to experience the most development during the lifetime of the Plan, concentrated on masterplanned areas in Elgin South; Findrassie, Elgin; Bilbohall, Elgin; Dallas Dhu, Forres and new growth areas (CD01 page 9) at Lochyhill, Forres; south west Buckie; Speyview, Aberlour and Fochabers.

The Proposed Plan clearly states that in the tertiary growth areas of Lossiemouth, Keith, Fochabers and Aberlour, the focus will be upon delivering already designated sites.

The objectors state that Moray's established land supply contains sites which are constrained. However, the objectors do not acknowledge that these sites do not form part of the effective housing land supply and that some sites can very easily become effective simply through a change in ownership or an infrastructure constraint being addressed or through inclusion in the Council Strategic Housing Investment Programme (SHIP) (CD44). Examples of where this change has happened include the sites at Stynie Road, Mosstodloch and Banff Road, Keith, which have both been constrained, but have recently come forward and have planning consent and are now included within the SHIP as a clear route to being delivered. Similarly site R1 St Andrews Road, Lhanbryde had been considered constrained but is now progressing towards a planning application. It is noted that these three proposals in Mosstodloch, Keith and Lhanbryde are all being progressed through the planning system by Springfield Properties plc.

The Council also intends to take a more proactive approach to delivery of housing sites where need is not being met and sites aren't coming forward and by addressing constrained sites. This involves closer working with partners including the Council's Housing services, NHS Grampian and exploring innovative models of delivery and funding such as the Housing Mix project which is one of several projects the Council hopes to progress through the Moray Growth Deal bid.

The objectors have not acknowledged that Moray has provided an effective housing land supply in compliance with Scottish Planning Policy since adopting the 2008 Moray Local Plan and the introduction of LONG sites, which won an award at the Scottish Awards for Quality in Planning. LONG sites add a reserve (otherwise effective) supply of land which can be brought forward if required and the agreed triggers for release (set out in the

Housing Land Audit) are met.

The Spatial Strategy approach set out in the Proposed Plan is considered to be the most sustainable, directing development to the main service centres with the best public transport and active travel connections. This is considered to support the SPP (CD53 page 13, para 40) principle of directing the right development to the right place. The Spatial Strategy is also considered to comply with SPP para 50 which requires planning authorities to identify the most sustainable locations for longer term development. Taking account of opportunities and constraints, the Council considers the spatial strategy represents the most sustainable approach during the period of the Plan. This is recognised in the Strategic Environmental Assessment, which discounts other options for growth, in preference to the Spatial Strategy set out within the Proposed Plan.

The objector suggests that sites should be in the control of a developer in order for the site to be included in the Proposed Plan. However, this approach is unlikely to result in the most sustainable approach or to meet housing need and demand across Moray. It also fails to reflect that sites such as St Andrews Road, Lhanbryde; Stynie Road, Mosstodloch; Speyview, Aberlour and Banff Road, Keith have all recently come forward (by Springfield Properties plc) or are in the process of coming forward through the planning system, despite not being in a developers control at the time of designation

The Council has taken full account of the increase in military personnel, family and additional employment opportunities at RAF Lossiemouth and the potential for increased personnel at Kinloss Barracks. This was factored into the housing land requirement generosity allowance of 30% and in the land releases in Elgin and Forres, notably at Findrassie and Elgin South and at Lochyhill, Forres. Close communication has been ongoing between the Ministry of Defence and the Council regarding housing needs associated with military and support personnel coming to Moray. The Ministry of Defence also controls substantial numbers of currently empty properties which in association with current and proposed housing available on the market can absorb much of the planned growth at both military bases. Details of all local developers and current housing availability of housing stock has been discussed regularly with the Ministry of Defence.

Role of Hopeman and Duffus in the Spatial Strategy

Hopeman

In terms of Hopeman's position in the Spatial Strategy, the Council does not consider there to be scope to extend the village beyond the sites identified in the Proposed Plan due to a number of constraints, including the character of the village, the Special Landscape Area, the limited services available and local road network constraints. Large scale expansion of the village has twice been rejected through Local Plan Public Local Inquiry in 2007 and Local Development Plan Examination in 2014 (CD 34 pages 123-141 and CD14 pages 314-316).

There is an effective housing land supply in Hopeman of 47 units identified in the housing land audit 2019 (CD41 page 31), consisting of 22 units at Forsyth Street and 25 units at R1 Manse Road. This will be added to through the "release" of the current LONG site at Manse Road in the new Plan for 50 units and the new site R2 at Hopeman Golf Club for a further 8 units, bringing the total housing land supply for Hopeman for the period of the Plan to 47 units plus 58, providing a total effective supply of 105 units. This is considered to meet needs within the plan period and beyond through the development of these "plan-

led” sites, beyond which the Council considers that Hopeman has reached the limits of its “physical” growth.

Duffus

In terms of Duffus’ position in the Spatial Strategy, the Council has not proposed any growth of the village in successive plans due to the character of the village and access constraints to the east.

There has been no significant change in circumstances to alter the approach for either Hopeman or Duffus and given the proactive approach to managing housing land supply in Moray, discussed below, the need within the Plan period will be met through the agreed Strategy in a Plan led and most sustainable approach. Further detail is provided in Schedule 9.

New Town and Effective Land Supply

The reference to exploring the need for a new town in the Proposed Plan states;

“.....taking a longer term view of future development, a longer term action to undertake preliminary investigations into suitable locations for a new town has been included in the Action/ Delivery Programme.”

The reference in the Proposed Plan to a search for sites for a new town is simply a preliminary investigation as to suitable sites should this become a much longer (2035+) option to explore, upon completion of the A96 dualling project. Springfield Properties plc object to the “over reliance on a new settlement”, when the Proposed Plan places no reliance, within the plan period, on a new town to meet housing land requirements.

The Council considers that through the effective, effective 5 years + and LONG term sites, that there is a housing land supply which is available for development and free of constraint of approximately 28 years supply when using the annual housing land supply target of 395 units. This does not include new sites within the Proposed Plan or currently constrained (other than LONG) sites which the Council will be working to address during the plan period.

It is notable that Homes for Scotland has not objected to the spatial strategy and that there has been no contest/ dispute to sites within the Housing Land Audit 2017 (CD39) or 2018 (CD40). Reference is made below to comments made in relation to the Housing Land Audit 2019 (CD41), which resulted in minor changes being made before the audit was agreed by Springfield Properties plc (CD42).

No modification is proposed.

Strategic Context

NHS Grampian (300/6/1)

NHS Grampian has requested that some of the information in Table 5 (Volume 1, page 17) be updated relating to Rothes and Aberlour, specifically that the works at Rothes are complete and that works at Aberlour will be complete in May 2019.

Table 5 in the Proposed Plan recognises that the works at Rothes are complete and could be updated to reflect that the works at Aberlour have also been completed since publication of the Proposed Plan.

If the Reporter is so minded, the Council would have no objection to the modification as outlined above.

Scottish Government (490/4/1), Homes for Scotland (1035/9/1)

Scottish Planning Policy (CD53) para 120 requires local development plans to set out the housing supply target separated into affordable and market sector) and the housing land requirement for each housing market area in the plan area.

Pages 12 and 13 of the Proposed Plan (CD01) identifies the Housing Targets as required by Scottish Planning Policy and the additional housing land requirement by Local Housing Market Area to meet targets. This is consistent with the approach taken in the Moray Local Development Plan 2015. For clarification/ consistency purposes, these could be modified to read;

“Housing targets

- Annual housing supply (completion) target 2018-2035 304 units (split 56% affordable/ 44% market).
- Annual housing supply (completion) target 2018-2023 424 units (split 56% affordable/ 44% market).
- Additional housing land requirement 2018-2035 1700 units
- Annual housing land requirement 2018-2035 395 units
- Annual housing land requirement 2018-2023 470 units.”

If the Reporter is so minded, the Council would have no objection to the modification as outlined above.

Springfield Properties plc (10/13/24), Dean Anderson (480)

Effectiveness of sites within Elgin LHMA

The objectors contest the effectiveness of sites within the Elgin LHMA and the need for additional sites to be identified in Hopeman and Duffus to meet demand. The Proposed Plan directs the majority of development to Elgin itself, but, contrary to the claims of the objectors, there are a number of development sites identified in other towns and villages in the market area which are progressing, including;

- R1 West of St Andrews Road (capacity 65 units), Lhanbryde- planning application from Springfield Properties plc anticipated summer 2019, early design discussions have taken place in April 2019.
- R1 Manse Road, Hopeman-(capacity 75 units) planning application from Tulloch of Cummington anticipated summer 2019, evidence provided by developer (CD13).
- R1 Stynie Road, Mosstodloch- planning application by Springfield Properties plc for first phase of 30 units approved by Planning and Regulatory Services Committee on 26 March 2019. Planning application by Springfield Properties plc for phase 2 and 3 remix of existing consent for 46 affordable houses was submitted in May 2019 (ref 19/00517/APP).
- Sunbank, Lossiemouth- site has planning consent for 278 units and is currently

under construction with 10 completions by the end of 2018 recorded in the housing land audit 2019 and a projected 20 units annually thereafter.

- Burghead- R2 and LONG Clarkly Hill- developer interest, development brief approved by the Council.
- OPP1 West Foreshore, Burghead- the Council and developer are discussing how to progress the site.

Effectiveness of sites in other LHMA's

Outwith the Elgin LHMA, the effectiveness of sites in Aberlour and Keith have been questioned by objectors;

* R1 Speyview, Aberlour- 1st phase of affordable housing and layout for the remainder of the site is subject to a planning application submitted by Springfield Properties Ltd, which is currently being determined.

* R4 Banff Road, Keith- a planning application by Springfield Properties plc for 122 affordable houses is currently being determined by the Council.

This clearly demonstrates that sites outwith Elgin are coming forward for development within the Elgin LHMA and that across Moray, the Council is exploring and finding ways of bringing constrained sites into the effective housing land supply. The Council has also evidenced sites being developed which were not in the control of a developer at the time of being designated in the Local Development Plan.

Springfield Properties plc also contest inclusion of the Lochyhill, Forres site within the Plan. A planning application for 229 units on this site has lapsed, however, through the housing land audit process and several meetings with the developer in early 2019, a Masterplanned approach is being progressed for this extensive designation, following a similar approach as Findrassie and Elgin South. While details of progress are commercially confidential, the Council considers this to be the primary Growth Area for Forres upon completion of the expansion south along the Grantown Road.

In terms of the viability of sites included in the Plan, the Council requested further detail and evidence of viability and deliverability as part of the bid submission process. The intention is to continue to seek this information through the DEL1 and DEL2 policies to ensure sites do come forward, that there is a greater focus on delivery and that resources can be targeted at sites which are stalling. While some sites will remain as constrained in the annual housing land audit, the Council is actively exploring innovative ways of developing these sites such as the Moray Growth Deal Housing Mix project.

Conclusions

The Council considers that the housing land designations made in the Proposed Plan reflect the Spatial Strategy, which takes account of a wide range of constraints and opportunities. The Council has managed the housing land supply in Moray successfully to maintain a very generous supply, twice releasing small areas of LONG reserves through the annual housing land audit to meet Scottish Planning Policy requirements.

No objection has been received from Homes for Scotland to the Housing Land Audits in 2017, 2018 or 2019, or to the housing land requirement set out in the Proposed Plan.

No modification is proposed.

Reporter's conclusions:

Reporter's recommendations: