



Moray Council
Strategic Housing Investment Plan
2024/25 – 2028/29

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1. Introduction

Moray Council's Strategic Housing Investment Plan (SHIP) has been prepared in accordance with the Scottish Government's Guidance Note MHDGN 2022/01 (June 2022).

Increasing supply of affordable housing is a key priority of both the LHS 2019-24 and Moray Local Improvement Plan (LOIP) as the key strategic planning documents of the Council and its partners.

In summary, the SHIP:

- sets out the Council's affordable housing investment priorities for achieving LHS outcomes, including reducing fuel poverty and meeting climate change targets;
- demonstrates how these outcomes will be delivered;
- identifies the resources required to deliver the investment priorities, including Scottish Government funding and other sources of public funding;
- enables the involvement of key local stakeholders in the development and implementation of proposals; and
- prioritises projects for inclusion in the Moray Affordable Housing Programme.

2. Moray Local Housing Strategy Priorities

The Council's current LHS covers the period 2019-2024, and was approved for implementation by Communities Committee on 2 April 2019. By delivering new affordable housing, the SHIP will contribute to the achievement of all 4 LHS Priorities which are:

Priority 1: To improve access to housing across all tenures and address housing need

Priority 2: To prevent and alleviate homelessness

Priority 3: To assist people requiring specialist housing

Priority 4: To improve the condition and energy efficiency of housing, and minimise fuel poverty

3. Affordable Housing Completions

Over the last 5 years i.e. 2019/20 – 2023/24, 592 units of affordable housing have been completed/acquired. The size, type and location of these properties are illustrated in the tables below:

| Affordable Housing Completions/Acquisitions 2019/20 – 2023/24, by location | | | | | | | | |
|--|----------------|--------------|--------------|--------------|-------------|--------------|-------------|-------------|
| Year | Landlord | Buckie HMA | Elgin HMA | Forres HMA | Keith HMA | Speyside HMA | CNP HMA | Total |
| 2019/20 | Moray Council | 28 | | | | | | 28 |
| | Hanover HA | | 46 | | | | | 46 |
| 2020/21 | Moray Council | | 102 | | | | | 102 |
| 2021/22 | Cairn HA | | 16 | | | | | 16 |
| | Hanover HA | 31 | 44 | | | | | 75 |
| | Moray Council | | 46 | | | | | 46 |
| | Osprey Housing | | 10 | | | | | 10 |
| 2022/23 | Cairn HA | | 28 | | | | | 28 |
| | GHA | | | 37 | | | | 37 |
| | Hanover HA | | 25 | | | | | 25 |
| | Moray Council | | 45 | | | | | 45 |
| | Osprey Housing | | 24 | | | | | 24 |
| 2023/24* | Cairn HA | | | 28 | | | | 28 |
| | GHA | | 41 | | | | | 41 |
| | Moray Council | | 8 | | 33 | | | 41 |
| Total | | 59 | 435 | 65 | 33 | 0 | 0 | 592 |
| | | 10.0% | 73.5% | 11.0% | 5.6% | 0.0% | 0.0% | 100% |

*completion expected

| Affordable Housing Completions/Acquisitions 2019/20 – 2023/24, by house size and type | | | | | | | | | | | | |
|--|-----------------|----------------------------|--------------------------------|----------------------------|--------------------------|--------------------------------|----------------------------|----------------------------|--------------------------|----------------------------|-----------------------------------|--------------|
| Year | Landlord | 1 bed general needs | 2 bed ambulant disabled | 2 bed general needs | 2 bed WC bungalow | 3 bed ambulant disabled | 3 bed general needs | 4 bed general needs | 4 Bed WC bungalow | 5 bed general needs | Extra Care/ Very sheltered | Total |
| 2019/20 | Moray Council | 8 | | | 2 | 1 | 6 | 10 | | 1 | | 28 |
| | Hanover HA | | 14 | | | | | 1 | | | 31 | 46 |
| 2020/21 | Moray Council | 32 | 32 | | 2 | 2 | 18 | 14 | 1 | 1 | | 102 |
| 2021/22 | Cairn HA | 14 | | | | | 2 | | | | | 16 |
| | Hanover HA | 22 | 11 | | 1 | 5 | 23 | 13 | | | | 75 |
| | Moray Council | 12 | 8 | 6 | | | 18 | 2 | | | | 46 |
| | Osprey Housing | 4 | | | | | 6 | | | | | 10 |
| 2022/23 | Cairn HA | 8 | 12 | | | | 4 | 4 | | | | 28 |
| | GHA | 8 | 13 | 8 | 2 | 1 | | 4 | | 1 | | 37 |
| | Hanover HA | 4 | 6 | | 2 | | 8 | 4 | | 1 | | 25 |
| | Moray Council | 8 | 1 | | | | 26 | 9 | | 1 | | 45 |
| | Osprey Housing | 8 | | | | 1 | 8 | 6 | | 1 | | 24 |
| 2023/24 * | Cairn HA | 12 | 8 | | | | 6 | 2 | | | | 28 |
| | GHA | 16 | 11 | | | | 6 | 7 | | 1 | | 41 |
| | Moray Council | 16 | 16 | | | 2 | 4 | | 1 | 2 | | 41 |
| Total | | 160 | 172 | 14 | 9 | 12 | 135 | 76 | 2 | 9 | 31 | 592 |
| | | 29.1% | 22.3% | 2.4% | 1.5% | 2.0% | 22.8% | 12.8% | 0.3% | 1.5% | 5.2% | 100% |

* completion expected

4. Affordable Housing Supply Target

The LHS 2019-2024 uses the Housing Need and Demand Assessment (HNDA) 2017 as its key evidence base. The HNDA was appraised as “robust and credible” by the Centre for Housing Market Research on 17 April 2018 and the LHS was approved by Communities Committee on 2 April 2019. The LHS Affordable Housing Supply Target states that 1,179 new affordable houses will be required over 5 years to meet housing need in Moray, on average **236 units per year**.

The targets shown in the table below are used to prioritise investment proposals contained in the SHIP, across the 6 Housing Market Areas in Moray. The targets aim to ensure proportionate investment to the areas as far as practicable within development constraints. Although the LHS Affordable Housing Supply Target states that 12% of units could be delivered as intermediate tenure housing, either mid-market rent or shared equity properties, previous experience has shown that development of intermediate tenure can be constrained and is not appropriate in all locations, due to comparatively low market rent levels.

| Moray Housing Supply Target (5 years) | | | | | | | | | |
|--|---------------------|----------------|------------|------------|-----------|-----------|--------------|------------------|-------|
| Tenure | Housing Market Area | | | | | | Moray | Average per year | |
| | Buckie | Cairn gorms NP | Elgin | Forres | Keith | Spey side | | | |
| Social Rent | 165 | 8.2 | 549 | 167 | 78 | 66 | 1,034 | 207 | 87.7% |
| Below market Rent/ Intermediate tenure | 26 | 1.3 | 68 | 24 | 13 | 12 | 145 | 29 | 12.3% |
| Total affordable housing | 191 | 10 | 618 | 191 | 91 | 78 | 1,179 | 236 | 100% |
| | 16.2% | 0.8% | 52.4% | 16.2% | 7.8% | 6.6% | 100% | | |

Figures may not sum due to rounding

Intermediate tenures

Intermediate tenure housing can form part of mixed tenure developments and can help to establish successful, sustainable new communities.

The LHS states that we will encourage proposals for delivery of:

- Mid-market rent in locations where they are most likely to be financially viable, in larger towns, close to centres of employment i.e. **Elgin, Forres**.
- Shared equity for first time buyers as part of larger developments (i.e. 50+ affordable units) where they provide an opportunity for **tenure diversification** and delivery of sustainable neighbourhoods, as well as an opportunity to alleviate overcrowding and free up social rented housing.
- Shared equity for older owner occupiers, as a trial, as part of larger developments (50+ affordable units) built to accessible design standards, as an

opportunity to promote both tenure and **generational diversification**, deliver sustainable neighbourhoods, as well as to facilitate downsizing and to provide **greater tenure choice** to our increasing older population.

Size and type of new affordable housing

There is a mismatch between demand for, and supply of, different sizes and types of affordable rented housing across Moray. Since 2011, we have been using a **model** to identify imbalances in supply in each Housing Market Area.

Over the last 14 years, Moray Council has been using the Scottish Government's More Homes Division investment to rebalance supply with demand, by investing in the types and sizes of housing which will reduce the imbalance through delivery of the SHIP.

There much higher than average pressure on 1 bed and 4+bed housing and considerably less pressure on 2 bed general needs housing. The LHS 2019-24 states that Moray will operate a **presumption against inclusion of 2 bed general needs** properties in our SHIP. We will only include 2 bed general needs housing in the SHIP where:

- they will form part of a larger (50+ affordable units) housing development where their inclusion will contribute to the establishment of a balanced and diverse new community and where their inclusion will provide opportunities for residents to move within their community over the long term; or,
- where their inclusion is justified by the model described above. This is most likely to occur in rural settlements which where the range of housing options is more limited.

Rapid Rehousing Transition Plan

The Council's Housing and Community Safety Committee considered Version 2 of Moray's Rapid Rehousing Transition Plan (RRTP) on 6 September 2022¹. Trends in Moray's homeless presentations shows that approximately 60% of homeless households are younger, single person households. As a result, the RRTP states that an increased supply of 1 bed flats for social rent is required to provide permanent housing options for statutorily homeless households.

The SHIP will contribute to the delivery of the RRTP by including 20-30% of new supply social rent units built in the form of 1 bed general needs flats. RSL partners are expected to play their part in achieving this.

¹ Rapid Rehousing Transition Plan available at http://www.moray.gov.uk/moray_standard/page_1917.html

5. Provision of Specialist Housing

Moray Health and Social Care Strategic Plan sets out the Integration Joint Board's approach to adult health and social care services in Moray. The affordable investment priorities of the LHS, delivered through the SHIP, are closely aligned with the priorities of the Strategic Plan.

The LHS seeks to address the needs of the ageing population in Moray through the provision of appropriately designed, appropriately supported, affordable housing for older and/or vulnerable people using a combination of ambulant disabled housing; wheelchair accessible housing and very sheltered/ extra care housing. Successive Moray SHIPs have included approximately 20% ambulant disabled housing for social rent across all developments in an effort to meet this need, and this SHIP adopts the same approach. This approach complements Health and Social Care Moray's policy on provision of retrofit disabled adaptations.

Housing for older people

The LHS 2019-24 states that Moray will operate a **presumption against inclusion of 1 bed ambulant disabled housing in our SHIP**. Alternatively we will promote delivery of ambulant disabled housing with a minimum of 2 bedrooms. This approach provides a more flexible house type, more able to meet the health and care needs of the likely occupant(s). This approach is complemented by the Council's Allocations Policy, whereby all single person households assessed as requiring ambulant disabled or wheelchair accessible housing are considered for 2 bed housing on an equal basis with couples, to maximise the likelihood of receiving an offer of rehousing.

Similarly, given the reducing demand for sheltered housing, we will not approve any new supply sheltered housing for inclusion in our SHIP. However we **will include new supply extra care housing**.

Wheelchair accessible housing

All housing delivered by the SHIP is expected to comply with Housing for Varying Needs (HfVN) standards. However, HfVN is silent on the definition of minimum internal space standards and local experience has shown that compliance with HfVN does not necessarily provide the level of internal circulation space required to meet the needs of full-time wheelchair users. This issue has been the subject of ongoing consultation with Health and Social Care Moray's Occupational Therapy department, and this SHIP benefits from the extensive learning acquired over the last 12+ years in delivery of appropriately designed wheelchair accessible housing in numbers and in locations which are sensitive to the needs of wheelchair users and their carers. Within the Council's own new build programme, these properties will include enhanced internal space standards, enhanced door widths and hall widths, level access showers, variable height kitchens, car ports and powered door entry systems; all intended to minimise the requirement for Stage 2 and/or Stage 3 disabled adaptations. Many developing RSLs have their own Design Guides which achieve similar standards resulting in successful long term outcomes for wheelchair users where Stage 3 disabled adaptations are much less likely and/or where the need for further house moves are minimised. All local development partners are

encouraged to adopt this approach. Moray Council will support provision of funding for Stage 2 adaptations to facilitate this approach to design and delivery.

The forthcoming Housing Need and Demand Assessment 2023 has not yet achieved “robust and credible” status, but is intended to provide the evidence base to set a **target** for provision of new wheelchair accessible housing, in accordance with Scottish Government guidance². Pending its approval, the SHIP will continue to respond to this need on a site by site basis and will consider factors including current housing list data (demand), current provision and current re-let rates (supply), in an effort to minimise the risk of over-provision and under-use in any given settlement.

During the period 2015 to 2019 the Council had been implementing a LDP policy which required a modest quota of wheelchair accessible units built in bungalow form, for open market sale. This policy had formed part of the LDP 2020 but the requirement for bungalows was removed from the policy by the Reporter.

It will be challenging to achieve delivery of wheelchair accessible housing in the private sector, as required by the Guidance, without the associated planning system levers.

Housing with support for people with learning disabilities

Health and Social Care Moray Learning Disability (LD) Service have implemented a “progression model” of specialist housing for their service users, as the result of an extensive LD Accommodation Review. The LHS states that to be successful, the progression model will require an increased range of housing options suitable for persons with a learning disability, provided with differing levels of care and this will require some new build provision. This range of options must include:

- core and cluster models
- extra-care housing
- housing provided with assistive technology

As a principle, Moray’s SHIP will award a **high priority** to all developments which include specialist housing for people with learning disabilities and so assists Health and Social Care Moray to implement the progression model, until such time as this housing need has been satisfied.

Moray’s investment programme has already delivered housing for people with learning disabilities at Highland Way, Buckie and Greenfield Circle, Elgin.

This SHIP includes developments at Bilbohall, Elgin; Garmouth Road, Lhanbryde and Western Village, Elgin South which will help to meet this specialist housing need.

² <https://www.gov.scot/publications/wheelchair-accessible-housing-target-guidance-note-mhdgn-201902/>

Affordable housing for key workers

The forthcoming Housing Need and Demand Assessment 2023 has not yet achieved “robust and credible” status, but its development has included consultation with local public and private sector partners to provide better understanding of housing needs in this area. The details of these findings will form part of the next Local Housing Strategy.

In advance of this, indications from HNDA development are that the NHS has been experiencing shortages of housing provision across several needs groups, and that this is an obstacle to recruitment, retention and service delivery affecting primary and secondary care settings in Moray. In advance of publication of the final HNDA, this SHIP has included projects which have potential for NHS key worker provision i.e. Bilbohall and High Street, Elgin, though these projects will require further direct and detailed discussion with the NHS in order to gain commitment and so progress.

In addition, the Council’s review of its Allocations Policy has included provision for NHS clinical staff to be granted additional priority for allocation of Council housing on a temporary (SSST) basis.

Gypsy/Travellers

At present Moray does not have any permanent, temporary or halting sites for gypsy/travellers.

Housing to 2040 includes a commitment for the Scottish Government to make up to £20 million available, over five years, starting in 2021/22. Information on the fund has been published³ and it is intended for both site improvements and additional accommodation.

The forthcoming Housing Need and Demand Assessment 2023 has not yet achieved “robust and credible” status, but has included an assessment of the housing needs of the gypsy/traveller and will inform the next Local Housing Strategy and Local Development Plan.

In the meantime, the Council is ready to progress delivery of housing for gypsy/travellers, should an opportunity arise.

³ <https://www.gov.scot/news/improving-accommodation-for-gypsytraveller-communities/>

6. Energy efficiency, fuel poverty and climate change

In the context of the Council's recently declared Climate Change Emergency, we expect that affordable housing providers will contribute to the LHS's Fuel Poverty and Climate Change outcomes by maximising the energy efficiency of housing funded through this SHIP and so reducing carbon emissions from housing.

To achieve the LHS fuel poverty outcomes, the Council expects that, as a minimum, all housing delivered by the Moray programme will achieve the Scottish Government's aspirations for zero carbon heating and EV charging, as set out in Housing to 2040. Going further, the Council encourages local development partners to work together to make the best use of innovative construction methods and emerging technologies to deliver passivhaus and district heating systems in Moray. These aims are aligned with those set out in the LHEES.

7. Moray's Child Poverty Action Plan

The role of housing is critical in helping to reduce child poverty. Moray's Child Poverty Action Plan Outcome 4 includes affordable housing and energy efficient homes in its priorities. This SHIP and the LHS 2019-24 will contribute to delivery of these priorities. In addition the Action Plan identifies maximisation of educational attainment as a priority. This SHIP will deliver affordable housing of a size and type intended to alleviate overcrowding (3+ beds), most prevalent in the social sector, and this in turn will play a part in increasing the potential to raise educational attainment and life chances for under-privileged children.

8. Individual open market purchase

This SHIP makes grant funding provision for 5 units of open market purchases per year. In addition, there is an option to pursue other open market opportunities where funding is available.

Moray Council will consider open market purchases if the following criteria are met:

- There is a need for the size and type of housing offered in the town/settlement, (the approaches detailed in Section 4 above will apply)
- The purchase will not result in homelessness
- The purchase price reflects the statutory condition requirements placed upon Council housing (SHQS/ESSH or similar standard)

Open market purchases will be prioritised as follows:

1. Where the purchase will assist the Council with delivery of SHQS/ESSH/ capital improvements
2. Where the purchase will assist the Council to meet housing need and/or where new affordable housing development is constrained
3. Where the purchase will assist the Council to meet specialist housing need
4. Where the purchase will bring an empty property back into occupation

Each property considered will be subject to a valuation and condition survey completed by the District Valuer or other RICS Chartered Surveyor. Vendors must pay their own costs.

In addition each property must be subject to a Value for Money assessment to ensure that the capital costs for acquisition and required upgrades/improvements can be met through the rental stream of the property without a negative impact on the Housing Revenue Account. Each property will require a property condition report by the Council's Housing and Property officers. Purchases must be approved by the Head of Housing and Property.

All properties purchased will become part of the Council's housing stock. Allocations will be made to Housing List applicants in accordance with the Council's Allocations Policy.

This SHIP makes provision for 12 properties per year to be purchased from the open market and brought into Council ownership for use as affordable housing for rent.

9. Resources

Resource Planning Assumptions

On 15 July 2021, the Scottish Government provided the Council with a Resource Planning Assumption (RPA) of £46.2m for 2021/22 to 2025/26.

| Year | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | Total |
|-------|----------|---------|---------|---------|---------|----------|
| Moray | £10.357m | £8.927m | £8.902m | £8.933m | £9.981m | £46.200m |

Although the RPA will provide the substantive budget for the SHIP proposals, funding will be also be available from **other sources** to help deliver the programme:

Council Tax levy on Empty Homes

We will continue to use ring-fenced monies raised from the [Council Tax levy on empty homes](#) as an additional source of programme funding. It is estimated that this contribution will be around £600k per annum. This income is set against the prudential borrowing associated with the Council's own new build programme.

Moray Council is developing an Empty Homes Strategy which will set out the levers available to enable home owners to bring their properties back into use, including available support and resources.

Commuted Payments

The Council will also use commuted payments derived through the LDP Affordable Housing Policy to fund SHIP projects but it is likely that sums collected from this source will be marginal. The LDP Affordable Housing Policy DP2(d) Guidance notes state that “*affordable housing should be provided on site and as part of a mixed development of private and affordable units*”, rather than the collection of commuted payments. As a result, the Council does not accumulate a significant pot of commuted payments. During 2022/23, £217,462 was collected in commuted sums, with more monies expected in future as development triggers are reached.

The [LDP 2020](#) Affordable Housing Policy (DP2) requires an affordable housing contribution from every unit of housing built, including single unit planning consents. Commuted payments required are secured through legal agreements (S75) often including development triggers, and when collected, are used to support affordable housing development within the Local Housing Market Area they are derived from. Whilst it is likely that the sums involved will continue to form a **relatively small** proportion of the SHIP’s resources, it is possible that the use of commuted payments could support the viability of individual projects, particularly those in rural areas, those with high infrastructure costs, or on brownfield sites. These projects will be identified during the term of the SHIP.

In implementing the Affordable Housing Policy, Council’s preference is for a minimum of 25% affordable housing units are provided on each site, using a housing mix of types and tenures determined by the Head of Housing and Property. A commuted payment will be sought from developers where:

- planning proposals are located in a (usually rural) area where there is **no evidence of housing need**, i.e. very few households registered on the Council’s Housing List, or where social housing tenants would have **limited access to services** e.g. public transport, health services, shops etc.
- the affordable housing requirement is **too small to be viable** for RSL partners to deliver, and/or provide a landlord service to.
- the planning proposals would require multi tenure/multi use provision under **one communal roof structure** e.g. a block of flats or mixed residential/commercial buildings. These proposals can present an increased investment risk to affordable housing providers due to the potential complications of communal repairs and maintenance throughout the life of the building. Each social housing landlord will make their own assessment of the business risks associated with communal repairs and maintenance.

10. Prioritising Investment

Prioritising investment proposals has been an important part of the SHIP preparation process. In prioritising the available development options, the Council and its partners have taken account of a range of factors, including:

- *the investment priorities set out in Local Housing Strategy (LHS)*
- *the deliverability of sites in terms of land ownership and planning consent and infrastructure constraints* – sites that are in the local affordable housing landbank have been prioritised, as have those that are not constrained or where there are firm plans to remove the constraint
- *joint strategic priorities* - priority has been given to sites that support the aims of strategic partners such as Health and Social Care Moray
- *the balance of the investment across Housing Market Areas* – the programme aims to reflect the sub-area housing supply targets set out in the LHS over the long term, as detailed in Section 4
- *the development plans and capacity of strategic partners* – priority has been given to sites for which partners have firm plans to develop during the life of the SHIP

During the development of the SHIP, we have engaged with a wide range of partners, including the locally-active Registered Social Landlords (RSLs), private developers and Health and Social Care Moray. The approach to preparing the SHIP has therefore been a collaborative process, which has sought to align the plans and aspirations of partners with the Council's strategic affordable housing priorities.

Officers in Housing meet, individually and collectively, with RSL and private developer partners to discuss their contribution to the delivery of the Moray affordable housing programme on an ongoing basis. Following a round of consultations and meetings, a draft of the SHIP tables were issued to RSL partners for comment and their views incorporated in the final proposals.

The LHS and Moray Local Development Plan are developed in tandem, and share common priorities relating to affordable housing, accessible housing and public health, reducing carbon emissions and creating sustainable communities. We expect that projects funded through the affordable housing programme will comply with design guidance set out in local planning policy.

Health and Social Care Moray has been consulted on the proposals for specialist housing provision and have identified needs in relation to older households and people with learning disabilities. The SHIP identifies sites where these specialist needs can be met.

The Heads of Terms for **Moray's Growth Deal** was signed on 24 August 2020. The Moray Growth Deal⁴ is a regional deal designed to boost economic growth and represents a combined investment of over £100m. The Growth Deal includes 8 projects, one of which is a **Housing Mix Delivery project** which aims to enable delivery of more homes in Moray (including affordable homes) through proactive

⁴ <https://www.mymoray.co.uk/moray-growth-deal>

public sector intervention to address market failure and overcome barriers, stimulating housing development in town centres, unlocking constrained sites, delivering affordable homes in rural towns and villages, and promoting pilot exemplar sustainable design and construction projects. The Moray Growth Deal Housing Mix Board includes representatives from the Council's housing and planning services and have ensured priorities are aligned.

11. Programme Delivery Challenges

The Council is committed to making the best use of available resources provided by the Scottish Government not just to maximise the number of affordable houses that can be delivered in Moray, but also to gain the best value for money from the investment, and maximise the positive outcomes gained for Moray's households. This commitment will support the Government's affordable housing targets.

The scope for maintaining/accelerating the Moray programme in line with the RPA, will be hampered without the resolution of **infrastructure constraints** on key sites. Therefore, the Council and RSL partners welcome the publication of the Scottish Government's Infrastructure Investment Plan 2021/22 to 2025/26, where the commitment to facilitating development is clear.

Current macro-economic factors including high inflation, higher cost of borrowing, and workforce shortages, continue to adversely impacted on the cost of development. Given the constraints on RSL and Council prudential borrowing, and the structure of Scottish Government More Homes Division funding, this pressure on costs presents a significant risk to progress on delivery.

Historically opportunities for development of affordable housing have been driven by implementation of LDP policy on affordable housing. During the term of the SHIP, the Council will ensure that planning policy is applied equitably and in accordance with the approaches set out in Section 4. The preferred arrangement for LDP affordable housing policy requirements (Policy DP2) will continue to be **affordable housing for rent, delivered on-site**.

The LDP makes an already **generous land supply** allocations across all HMAs and this will be reviewed and enhanced in the light of the forthcoming HNDA. The phasing of the SHIP programme reflects the Council's consultations with Planning Officers and private developer partners on the timescales and phasing of construction.

Land-banking activities by the Council and RSL partners have helped to address historic issues around the pace of delivery. Key land-banked sites to be delivered during the life of the SHIP are Banff Road, Keith; Bilbohall, Elgin, Speyview, Aberlour and Garmouth Road, Lhanbryde. With the pace of development not set by a private developer, housing delivery can be planned on these sites with a greater degree of control and certainty, but where conditions within the current construction market referred to above remain a significant risk to viability.

Further affordable housing land-banking proposals are contained in the SHIP including the purchase of sites from other public agency partners as part of

protocols to dispose of surplus public sector land and property for affordable housing. This protocol has enabled the purchase of The Firs site (part of Bilbohall), Elgin and former MOD properties at Pinegrove, Elgin.

The Council's Housing Revenue Account Business Plan provides for development of 50 houses per annum which falls short of the number required by some margin. Therefore the **contribution of RSL partners is essential** in ensuring that the Moray programme takes advantage of all available resources. Moray Council welcomes the participation of RSLs in the delivery programme. The investment proposals set out in the SHIP reflect the investment plans of partner RSLs but the Council will continue to work closely with the RSLs and Scottish Government's More Homes Division to address any funding or capacity constraints that could impact on programme delivery.

The Council and its RSL partners will continue to work closely with private developers to ensure that the sites with affordable housing contributions are delivered in line with Programme Agreements made with the Scottish Government.

12. Programme Proposals

The Council and its partners have set out a realistic investment programme which takes account of the delivery challenges detailed in the previous section. The proposals for Years 1 and 2 reflect the profile of the indicative Resource Planning Assumption for that period, but also include a generous shadow programme, of more than 25%, to allow projects to be brought forward in the event of delay, slippage or should additional funding become available.

The Council and Grampian Housing Association proposals at **Bilbohall**, Elgin will take up a significant proportion of available grant funding but continue to experience financial viability issues and delay. It is unlikely that this project will be viable without the support of the Scottish Government to address known infrastructure constraints.

There are 3 strategic land designations progressing. These are:

- Findrassie, Elgin - the first phase is complete with proposals for 3 further phases included in the SHIP.
- Elgin South - Moray Council has completed 2 phases with a further 4 phases of development included in the SHIP.
- Kinneddar Meadows, Lossiemouth - the first phase is complete with proposals for 2 further phases included in the SHIP.

The SHIP includes proposals for phased development of the large site at Banff Road, Keith with planning consent for 122 units and land-banked by the Council. Phase 1 (33 units) is complete and Phase 2 is under construction. It is anticipated that the remaining units will be completed over 2-3 phases over the next 5 years.

The SHIP aims to address housing need across Moray and investment priorities are identified in Forres, Keith, Speyside and Buckie. Across the 5 year term of this SHIP, the geographical distribution of proposals is consistent with the Housing Supply Targets set out in Section 4 and in the Local Housing Strategy 2019-24.

In line with LHS priorities, the SHIP aims to deliver predominantly affordable housing for rent via a social landlord. The programme also makes provision for an element of intermediate tenure including mid-market rent and/or low cost home ownership through the New Supply Shared Equity initiative in accordance with HNDA findings. The principles for inclusion of intermediate tenure in the SHIP are set out in Section 4.

13. Equalities

The Equality Act 2010 replaces the need for public bodies to have separate equalities schemes. An Equalities Impact Assessment (EqIA) was completed as part of the development of the LHS 2019-24⁵, was subject to consultation with equality groups and stakeholders, and was considered by Communities Committee on 5 February 2019. Equality issues relating homeless households have been considered further in the RRTP EqIA⁵.

The SHIP takes account of the available information on the specific housing needs of different communities and households in Moray collected as part of the HNDA. The ethnic minority population in Moray comprises less than 1% of the total population and is significantly lower than the Scottish average. The ethnic minority population is dispersed throughout Moray. The SHIP has not identified specific housing provision in relation to this group. This position will be reviewed in the light of the findings of the next HNDA.

The investment proposed for the provision of new affordable housing will seek to address socio-economic inequality by addressing homelessness, alleviating overcrowding and meeting the housing needs of low income households and other vulnerable groups.

14. Strategic Environmental Assessment

The SHIP does not determine where development is to take place nor the Council's investment priorities and targets for affordable housing. As these priorities are contained in the LHS, to which the SHIP is a supporting document, the Council considers that the most appropriate level for the Strategic Environmental Assessment (SEA) is the LHS.

The Scottish Government's SEA Gateway have confirmed that a SEA of the LHS is not required as it does not identify land for new housing and because the impact of new affordable housing development would be determined through the SEA of the Local Development Plan.

⁵ http://www.moray.gov.uk/moray_standard/page_1917.html

15. Consultation and Stakeholder Engagement

As the HNDA 2017 considers the Moray Housing Market Area to be highly self-contained, neighbouring local authorities have not been consulted as part of the preparation of the LHS nor the SHIP.

The Council consulted members of the Housing Strategy Group as part of the preparation of the LHS. This Group is a forum for engaging the broad range of public agency and private sector partners in the development and implementation of the LHS. Members of the group include interested Council services, such as housing, planning, community care and health as well as the Scottish Government, the locally active Registered Social Landlords (RSLs) and Homes for Scotland. The Cairngorm National Park Authority (CNPA) is also represented.

The Council, Scottish Government and RSLs actively developing in Moray meet regularly to discuss their plans and share information. This SHIP is the result of those ongoing discussions. The finalised tables have been the subject of consultation with all partners throughout summer/autumn 2023.

Moray Council tenants receive details of the investment proposals set out in the SHIP via the “Tenants Voice” newsletter. Partner RSLs are expected to use their own methods of communication to publicise SHIP proposals to their tenants. This SHIP⁶ is available on the Council’s website and publicised via the Council’s social media channels.

16. Monitoring and Review

The delivery of the SHIP will be monitored as part of ongoing programme management arrangements with the Scottish Government.

Elected Members are provided with regular reports on progress on the SHIP and delivery of the affordable housing programme.

⁶ http://www.moray.gov.uk/moray_standard/page_95565.html