



**Moray Council
Strategic Housing Investment Plan
2020/21 – 2024/25**

31 October 2019

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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 2019/04 (August 2019).

Increasing supply of affordable housing is a key priority of both the LHS 2019-24 and Moray 2027 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 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 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 10 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 Communities Committee considered the second iteration of Moray's Rapid Rehousing Transition Plan (RRTP) on 28 May 2019. Trends in Moray's homeless presentations shows that approximately 50% of homeless 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 social rent units built in the form of 1 bed general needs flats. RSL partners are expected to play their part in achieving this.

4. 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 Strategic Plan includes a Housing Contribution Statement describing how the local housing sector will help achieve the local and national health and wellbeing outcomes¹. The statement provides a linkage between the affordable investment priorities of the LHS, delivered through the SHIP, and the priorities of the Strategic Plan. As a key joint priority, the statement reaffirms the LHS commitment to allocate funding for affordable housing to meet the housing needs of older and disabled people.

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 amenity/ medium dependency 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 in the SHIP. This approach provides a more flexible house type, more able to meet the health needs of the likely occupant(s). This approach is complemented by amendments to the Council's Allocations Policy implemented in 2013, 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 10 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

¹ Moray Health and social care Strategic Plan available at http://www.moray.gov.uk/moray_standard/page_101207.html

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 local development partners have already implemented their own Design Guides which result 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.

Rather than set an arbitrary **target** for provision of new wheelchair accessible housing, the SHIP will 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.

As a principle, all but the smallest developments in the SHIP will include a small number of specialist bungalows intended to better meet the needs of wheelchair users.

Housing with support for people with learning disabilities

Health and Social Care Moray Learning Disability Service have implemented a “progression model” of specialist housing for their service users. Moray Council Housing and Property have participated in the Accommodation Review over the last 2 years. 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.

This SHIP includes developments at Highland Yard, Buckie; Garmouth Road, Lhanbryde and Pinegrove, Elgin as well as provision for specialist housing to be included in development of the Bilbohall Masterplan area.

5. Moray's Child Poverty Action Plan

The role of housing is critical in helping to reduce child poverty. Moray's Child Poverty Action Plan 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 skills and qualifications as a primary driver of poverty. This SHIP will deliver affordable housing of a size and type intended to alleviate overcrowding, which is 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.

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 "greener" standard. 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 zero carbon housing in Moray.

All housing developers are expected to maximise the subsidies available to deliver sustainable and energy efficient housing. The SHIP assumes that the higher Scottish Government subsidy rate for greener standards would be required for all projects.

7. Resources

Resource Planning Assumptions

On 30 April 2019, the Scottish Government provided the Council with a Resource Planning Assumption (RPA) of £9.633m for 2020/21. The Government has not provided a RPA for beyond 2021, but we have assumed the same RPA in future years for planning purposes.

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

Housing Infrastructure Fund

The SHIP has included provision for support from the Scottish Government's Housing Infrastructure Fund as a means of unlocking constrained sites for affordable housing delivery. The SHIP identifies the strategically important sites at Bilbohall South in Elgin as requiring support from the fund to address transport infrastructure constraints.

Council Tax levy on Empty Homes

We will continue to use ring-fenced monies raised from the **Council Tax levy on empty homes**² 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 Council's prudential borrowing associated with its own new build programme.

Commuted Payments

The Council will also use **commuted payments** derived through the Local Development Plan (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 prioritises the provision of housing units on site, rather than the collection of commuted payments. As a result, the Council does not accumulate a significant pot of commuted payments. During 2018/19, £44k in commuted sums were collected, with more monies expected in future as development triggers are reached.

The Proposed LDP 2020 expands the scope of the Affordable Housing Policy by removing the qualifying threshold number of units (previously 4 units). In effect, this change will seek a proportionate affordable housing requirement from every dwelling proposed. It is likely that this will result in an increase the number of commuted payments required. 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 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 funding plan, it is possible that the use of

² Details of the Council's Council Tax Levy on Empty homes is available here: http://www.moray.gov.uk/moray_standard/page_95176.html

commuted payments could support the viability of individual projects, particularly those in rural areas. These projects will be identified during the life 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 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.

8. 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 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 the 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 as detailed in Section 3
- *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 have met, both individually and collectively, with RSL and private developer partners to discuss their contribution to the delivery of the Moray affordable housing programme. Following a round of consultations and meetings, a draft of the SHIP tables were issued to 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, 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 and will achieve a “green” standard in the Quality Audit carried out as part of the planning application process.

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.

9. Programme Delivery Challenges

The Council is committed to making the best use of the enhanced 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 target to build 50,000 new affordable houses.

As well as opportunities, the higher resources will also present the Council and its partners with programme delivery challenges. The key challenges are around the scope for accelerating the Moray programme in line with the RPA, the resolution of **infrastructure constraints** on key sites and the expansion of RSL involvement in delivering the programme.

As in previous years, the programme is driven to a large extent by opportunities presented by affordable housing requirements under Local Development Plan policy. During the life of the SHIP, the Council will ensure that planning policy is applied equitably and in accordance with the approaches set out in Section 3. The preferred arrangement for LDP affordable housing policy requirements will continue to be **delivery on-site**.

The LDP makes **generous land supply** allocations across all HMAs. 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.

Landbanking activities by the Council and affordable housing partners have helped to address historic issues around the pace of delivery. Key landbanked sites to be delivered during the life of the SHIP include Banff Road, Keith; Bilbohall, Elgin; Stynie Road, Mosstodloch. With development not dependant on the plans of a

private developer, housing delivery can be planned on these sites with a greater degree of control and certainty.

Further affordable housing landbanking 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 for affordable housing. This protocol has enabled the purchase of The Firs site, Elgin and the forthcoming purchase of the former Spynie Hospital site, Elgin, both from NHS Grampian, and Garmouth Road, Lhanbryde from the Council's General Needs Account.

In recent years, the level of RSL development in Moray has been limited due to funding issues and the Council has been the main provider of new affordable housing. However, with increased subsidy rates, the SHIP expects that RSLs will make a much greater contribution to the Moray programme. The Council Housing Business Plan provides for development of 50 houses per annum until 2023/24, but the contribution of RSL partners is essential in ensuring that the Moray programme takes advantage of the increased resources. 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 the local division of More Homes Scotland 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 the programme agreements with the Scottish Government.

10. 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 an over-programming factor of more than 25% to allow projects to be brought forward in the event of slippage or should additional funding become available.

In line with LHS Affordable Housing Supply Targets, the SHIP allocates the highest proportion of investment to the Elgin Housing Market Area. The key sites forming the spine of the programme are Bilbohall, Spynie/Hamilton Gardens, Findrassie and the Spynie Hospital site, Elgin. However, the SHIP aims to address housing need across Moray and investment priorities are also identified in Buckie, Forres, Keith and Speyside.

A development masterplan for Bilbohall was approved by the Council as planning Supplementary Guidance in November 2018. With support from the Housing Infrastructure Fund to address ongoing site constraints, the SHIP makes provision for the delivery of more than 275 affordable houses at Bilbohall on sites owned by Grampian Housing Association and the Council.

A development masterplan for Elgin South, proposing 2,500 homes, has been approved as planning Supplementary Guidance. A first phase of development of 870 houses with an affordable housing contribution of 217 units obtained planning consent in June 2017. Construction of 50 affordable units at Elgin South Phase 1 is expected to complete during 2020/21.

Also included are proposals for phased development of the large sites at Banff Road, Keith with planning consent for 122 units and Stynie Road, Mosstodloch with planning consent for 76 units, both landbanked by the Council. It is anticipated that these sites will be developed in phases of 30-40 houses over a number of years with both the Council and RSL partners involved in the development. Each will include a proportion of intermediate tenure, in accordance with LHS Affordable Housing Supply Targets.

Projects in Speyside have been included but delivery continues to be affected by infrastructure constraints. Although the SHIP makes provision for investment in Speyside, the programmes for delivery take account of anticipated timescales for resolving infrastructure and other site development constraints.

With an approved masterplan for 1,500 houses, Findrassie is a key strategic land designation supporting the expansion to the north of Elgin over the next 20 years. Detailed proposals and phasing for the affordable housing contribution have yet to be finalised by the developer and the proposals identified in the SHIP are indicative at this stage.

The programme for Sunbank/Kinneddar in Lossiemouth reflects the developer's phasing of the affordable housing requirement. This site has a contribution of 72 units but the proposals identified in the SHIP are indicative at this stage.

In line with LHS priorities, the SHIP aims to deliver mainly social rented housing. The programme also makes provision for an element of intermediate tenure including mid-market rent and low cost home ownership through the New Supply Share Equity initiative. As well as improving tenure choice, the inclusion of intermediate tenure promotes community sustainability aspirations as well as meeting local planning policy on urban design in terms of housing mix, tenure integration, housing choice and opportunity. The principles for inclusion of intermediate tenure are set out in Section 3.

11. Equalities

The Equality Act 2010 replaces the need for public bodies to have separate equalities schemes. The Council's Single Equality Scheme³ covers all equality strands and forms the basis of the Council's approach to prioritising equality and diversity. The Housing Strategy Group has completed an Equalities Impact Assessment (EqIA) as part of the development of this LHS. The LHS EqIA was considered by Communities Committee on 5 February 2019, and has been subject to consultation with equality groups and stakeholders⁴. Equality issues relating to homeless households have been considered further in the RRTP EqIA.⁵

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. This group is dispersed throughout Moray. The SHIP has not identified specific housing provision in relation to this group.

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.

³ Moray Council's Single Equality Scheme is available at http://www.moray.gov.uk/moray_standard/page_43740.html

⁴ Moray's LHS EQIA is available here http://www.moray.gov.uk/moray_standard/page_95565.html

⁵ Moray's RRTB EqIA is available here http://www.moray.gov.uk/moray_standard/page_1917.html (Appendix 2)

12. 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.

13. 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's Communities Committee is provided with regular reports on progress with the delivery of the SHIP and the Strategic Programme Agreement. Details of the SHIP will be presented to the Committee in December 2019.

During the consultation period, the Council published the draft SHIP on its website. 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 SHIP is available on the Council's website⁶ and publicised via the Council's social media channels.

14. Monitoring and Review

The delivery of the SHIP will be monitored as part of ongoing programme management arrangements with the Scottish Government. At a local level, progress on the delivery of the LHS is monitored through the Communities Committee and Housing Strategy Group. The Communities Committee receives regular reports on progress with the delivery of the Strategic Local Programme.

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