

National Planning Framework 4

Moray

Minimum All-Tenure Housing Land Requirement

ASSESSMENT REPORT

Scottish Government

Planning & Architecture Division and Housing & Social Justice

September 2021

CORE OUTPUTS ASSESSMENT

1 Locally Adjusted Estimate

	Initial Default Estimate	Locally Adjusted Estimate
Moray	1,800	3,450

The locally adjusted estimate is primarily driven by newly forming households. It has been increased to 3,450 units from an initial default estimate of 1,800. This moves the estimate closer to the 10-year completions of 4,514 (Scottish Government - [Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot \(www.gov.scot\)](http://www.gov.scot)) and is described as realistic.

2 Household Projections (Newly-Forming Households)

The Council has proposed an alternative household projection which is equal to 2,180 households over 10 years as against the National Records of Scotland (NRS) principal migration variant of 1,250. In discussion, the Council indicated the high migration variant wasn't considered representative of the likely growth in the area.

The Council has taken the Council Tax records to establish the number of households, estimated to be 43,600 in 2021, and increased this by 5 per cent, which is referred to as a 'national forecast'. The Council were invited to apply a 15 year timeframe (10 years annualised) but this was not undertaken.

Household Projection: Default Compared to Adjusted Estimates

	Default	Adjusted
Moray	1,200	2,200

3 Existing Housing Need

Existing Housing Need: Default Compared to Adjusted Estimates

	Default	Adjusted
Moray	200	500

Whilst the initial response from the Council does not specifically state how they arrived at the figure of 480, they have subsequently confirmed that it is arrived at using the same criteria as their previous Housing Need and Demand

	<p>Assessment (HNDA) in 2017 but applied to the current housing list. This includes:</p> <ul style="list-style-type: none"> • Statutorily homeless households of any age, including those in temporary accommodation • Households aged 30+ that are <i>both</i> concealed <i>and</i> overcrowded. Most applicants aged under 30 have been excluded to avoid double counting with household formation • Households of any age who have significant (usually medical) housing needs i.e. those whose needs are best met through new build provision, usually of wheelchair accessible standard
4	<p>Flexibility Allowance</p> <p>Moray Council have used the default 30% flexibility rural classification.</p>

CORE PROCESSES ASSESSMENT	
1	<p>Using the Response Template and Excel Calculator</p> <p>The Council has not used the Response Template or provided Excel Calculator. Their alternative submission of six pages, however, does not exceed the word limit.</p>
2	<p>Housing Market Partnership and Stakeholders Involvement</p> <p>There is an intention noted to consult the Housing Market Partnership and report any points of disagreement. Discussions with the Council confirmed engagement with HMP but noted a limited response.</p> <p>Correspondence with Homes for Scotland set out that higher household projection and need was promoted by them. With regard to the adjusted estimate there was insufficient information available to allow HfS to fully review them.</p>
3	<p>Joint Housing and Planning Senior Official Sign-Off</p> <p>The response was agreed by the Planning and Regulatory Services Committee on 18 May 2021. This was a report by the Depute Chief Executive (Economy, Environment And Finance) who has line management responsibility for Planning and Housing.</p>

4	<p>Statistical Evidence</p> <p>The council uses some recognised source of statistical data including:</p> <ul style="list-style-type: none"> • Council Tax Records • Housing Need and Demand Assessment
5	<p>Policy Evidence</p> <p>Increased household projections are based upon the Council's economic growth aspirations, supporting a number of high profile Growth Deal projects, the increase of personnel and support roles at RAF Lossiemouth, aspirations to retain young people, attract talent and also reflecting stronger in-migration and higher house sales being experienced arising from Covid-19. The additional investment from Scottish Government to fund affordable housing is also referred to.</p>

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)	
For the reasons specified above, the proposed MATHLR is:	
	MATHLR
Moray	3,450