

# MORAY LOCAL HOUSING STRATEGY 2025-2030





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## 1 Introduction to the Moray Local Housing Strategy

Moray Council is pleased to present this new five-year Local Housing Strategy (LHS) for Moray, covering the period 2025-2030.

This document takes the form of a consultative draft strategy document, detailing the evidence, stakeholder engagement, 5-year vision, strategic priorities and agreed actions that will form the basis of the final Local Housing Strategy document. In September 2025 Moray Council will be seeking approval for public consultation prior to the final LHS being finalised and launched

The Local Housing Strategy sets out the strategic direction, policies and plans that will enable Moray Council and partners to deliver high quality housing and housing services to meet the needs of local people in every housing tenure. The LHS also sets out the important contribution that housing makes to enabling economic growth, creating connected and sustainable places, improving health and wellbeing, tackling poverty and achieving climate change in Moray.

This Local Housing Strategy builds on the progress of the 2019-24 Local Housing Strategy and sits at the heart of all housing planning arrangements and partnership activities in Moray. It is an ambitious strategy, setting out what homes and communities should look and feel like over the next five years. The LHS vision ensures that housing successfully contributes towards the area's population and economic growth objectives, ensuring that people live in quality homes which are well connected to jobs and to thriving and sustainable local communities.

To maximise housing's contribution to Moray's strategic objectives, Local Housing Strategy outcomes must be elevated and firmly embedded into the corporate, community planning, health and economic development strategies of the area. To achieve this, the new Local Housing Strategy has been co-produced with strategic partners and stakeholders who will play an important part in implementation and delivery, making the case for housing investment, and housing system improvement over the next 5 years.

The 2019-24 LHS was delivered against a backdrop of global economic stress following the Covid-19 pandemic and war in Ukraine which led to rising inflation, interest rates and cost of living pressures. All these factors have and will continue to have an impact on the Moray economy, local housing system and local communities. Reflecting this starting point, the 2025-2030 Local Housing Strategy seeks to ensure that a sufficient supply of good quality, affordable, warm housing is available to meet the needs of households living and working in Moray, as well as those who wish to move to the area to take up the high-quality employment opportunities created as a result of the Moray Growth Deal.

### 1.1 Local Housing Strategy Purpose

The LHS sets out the vision of Moray Council and local partners to guide the delivery of housing supply across all tenures and types of housing provision, as well as the development of housing services to support local people to live independently and well in the community they choose. The strategy aligns with national and local housing priorities, including key objectives within Moray's economic development strategy. The main purpose of the Local Housing Strategy is to:

- set out a shared understanding of need and demand for all types of housing, and for housing services now and in the future
- provide clear strategic direction for housing investment including the development of new homes as well as investment in existing housing



- set out actions and targets to improve the quality, condition and energy efficiency of homes
- provide a strong contribution to the integration of housing, health and social care services to enable independent living and improved wellbeing outcomes
- set the framework to prevent homelessness wherever possible and to resolve homelessness quickly and effectively when it does occur
- focus on the priorities and outcomes required to achieve the LHS vision.

In meeting the requirements of the LHS Guidance (Scottish Government, 2019), the strategy must be:

 Informed by latest housing insight and evidence	 Clear on the links to previous LHS priorities
 Developed in collaboration with partners, stakeholders & residents	 Informed by extensive and inclusive consultation
 Forward looking and delivery focused	 Clear, concise & easy to read

## 1.2 Local Housing Strategy 2019-24 Outcomes and Achievements

This Local Housing Strategy builds on a strong foundation of positive housing outcomes delivered by the 2019-24 LHS. Key outcomes achieved over the last 5 years are as follows:

### Improve access to housing in all tenures and alleviate housing need



Delivery of 1,799 housing completions between 2019 and 2024 against the LHS Housing Supply Target of 1,179 units over 5 years

Delivery of 520 new affordable homes through the delivery of the Strategic Housing Investment Programme 2019-24

Delivery of 1,279 market homes by private house builders between 2019 and 2024

Attainment of 37 market properties for conversion to affordable housing through the Moray strategic acquisition programme

The Moray Growth Deal Housing mix delivery project business case was approved during Q4 2023/24, and the project has entered delivery. The project supports the delivery of up to 300 affordable houses and plots; 150 short-term construction jobs annually; stimulates the private housebuilding sector to deliver up to 500 market houses; supports town centre regeneration of brownfield sites; and the provision of housing in rural towns and villages.

84 new tenancies created as a result of the Moray Council downsizing scheme, which proactively addresses overcrowding and under-occupation by better matching households to homes.



### Prevent and alleviate homelessness



Delivery of housing options advice and assistance to 4,532 households concerned about homelessness between 2019 and 2024

1,607 households accessing housing options service whose homelessness was prevented

1,107 households receiving tenancy and housing support services to enable housing sustainment

12% reduction in the number of temporary accommodation units as a result of delivering the rapid rehousing transition plan

20% reduction in the number of days homeless households spend in temporary accommodation

27 households with severe and multiple disadvantage who have accessed Housing First services

The initial Rapid Rehousing Transition Plan (RRTP) was launched in 2019, but due to receiving only around 20% of the funding requested, the plan had to be revised to better align with the reduced allocation. The Covid -19 pandemic had a significant impact on the review of the plan but the updated RRTP was approved and now covers the period from 2022/23 to 2026/27.

### Assist people with specialist housing needs



Delivery of 11 new accessible homes specifically designed for wheelchair users

Delivery of 184 new accessible ambulant disabled homes

Delivery of 31 new accessible Extra Care/very sheltered tenancies.

Up to 1,860 households provided with telecare services to remain independent at home

Annual average investment of £386,000 on aids and adaptations to support tenants to remain at home.

Investment of just over £2M on 252 aids and adaptations in private housing sector between 2019-2024

### Improve the condition and energy efficiency of housing, and minimise fuel poverty



Investment of £9M in energy improvement works via Energy Efficient Scotland Area based Scheme (EES ABS), enabling over 782 private homes to improve energy performance

Investment of £808,000 in energy improvement works via ECO funding Programmes, enabling over 45 private homes to improve fabric, with this only been provided for the last year

Moray is now home to five recorded heat network sites which provide a sustainable and affordable source of heat to a variety of buildings, including residential properties.

Support, advice and assistance on property condition provided to over 1,600 residents in private housing per annum via the Scheme of Assistance.



### 1.3 Local Housing Strategy Consultation and Engagement

Local authorities are required by the Housing (Scotland) Act 2001 and The Equality Act 2010 to consult on their Local Housing Strategy, with a duty placed on public bodies to involve, consult and engage with as many local residents, tenants and communities of interest as possible.

An extensive consultation and engagement programme was delivered to support development of the new LHS, offering a range of opportunities for local people, communities and wider stakeholders to share their views on the most pressing housing challenges facing Moray, as well as potential ideas for change and improvement.

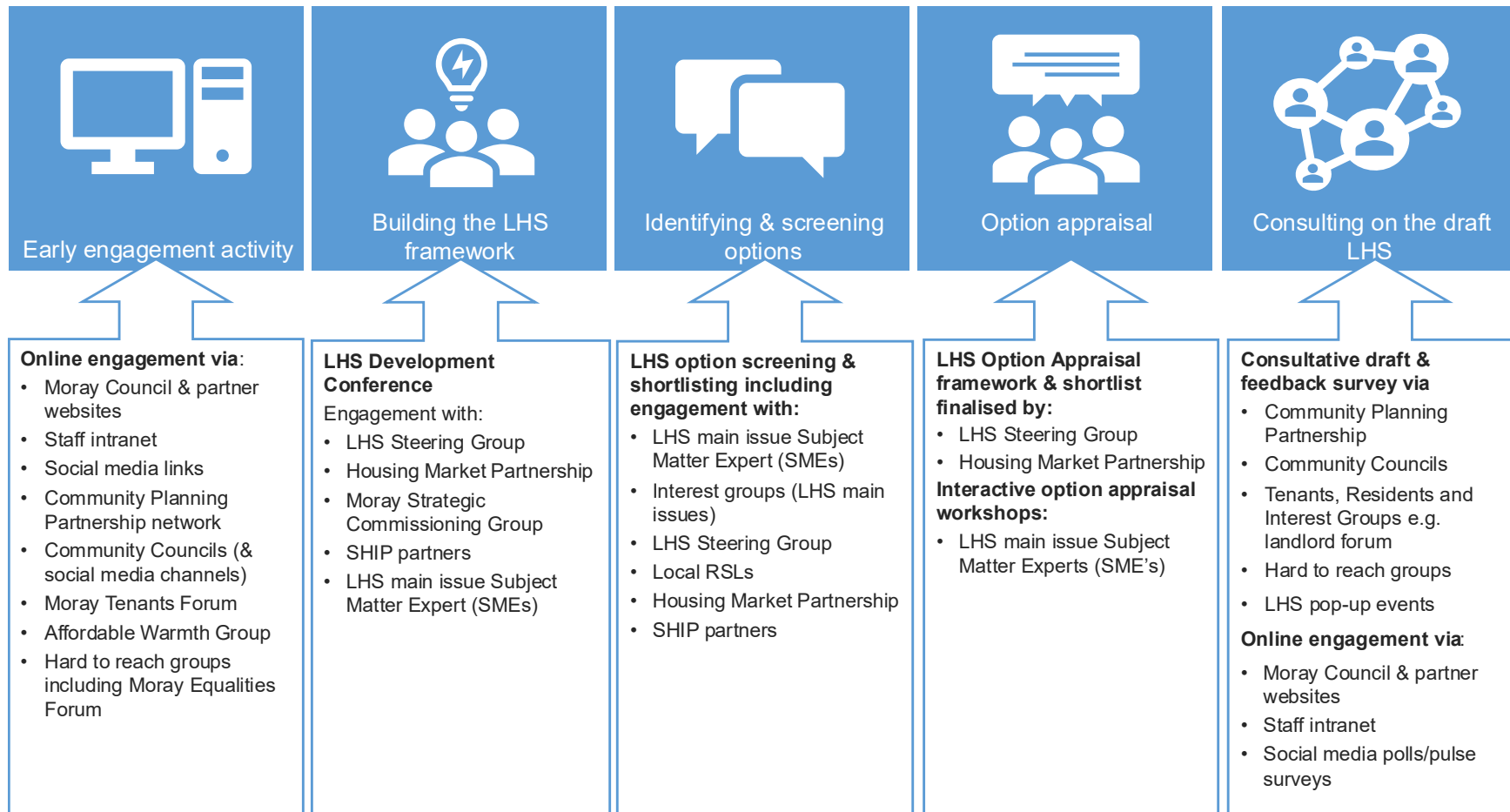
As a result, a diverse network of partners, stakeholders and subject matter experts participated in developing the new Local Housing Strategy. Consultation processes successfully assembled a range of views, enabling feedback to systematically inform the LHS development. These processes included the following opportunities:

- **LHS early engagement survey:** A survey to inform the priorities of the new Local Housing Strategy was made available to communities and all residents across Moray, enabling them to express their views on which local housing issues 'matter most'. The survey was open for six weeks from February to March 2025 and was completed by 360 local residents and community representatives. The early engagement survey was heavily promoted across Moray Council's digital and social media channels. It was also promoted via the local press, by Steering Group partners and marketed to employees in Moray Council and the Health and Social Care Partnership (HSCP). The survey was made available online with alternative survey formats including telephone and freepost options. This survey further boosted the 911 survey responses achieved by the Housing Need & Demand Assessment (HNDA) household survey carried out in 2023 to test the current circumstances, future intentions and housing aspirations of Moray households.
- **Stakeholder conference:** To encourage and enable widespread participation, a full day LHS development conference was held on the 20<sup>th</sup> of March 2025 via Microsoft Teams. Over 50 partners and stakeholders attended the event, including representatives from public, private, third and community sectors. The purpose of the conference was to co-produce an LHS vision, agree the main housing issues that should form the basis of LHS outcomes and generate ideas and innovations as a basis for LHS actions. A conference report summarising the outcomes from the day can be accessed in Appendix A.
- **Option identification workshops:** In May 2025, four half-day workshop sessions were held, to inform the definition of key LHS priorities, together with a range of viable options for addressing them. Workshop participants were specialist stakeholders and subject matter experts from across the Council and partner organisations including private housing developers, RSLs, Moray Council housing services, planners, homelessness and housing support officers, HSCP commissioning and client group managers, private sector housing team officers, building control and environmental health officers.
- **Option appraisal workshops:** In May 2025, four half-day workshop sessions were held to systematically appraise LHS options against pre-determined criteria. The outputs from these sessions form the basis of the LHS actions, detailed in Chapters 5-8.
- **Strategic engagement:** Mechanisms were put in place, as part of the LHS consultation plan to ensure the LHS is fully aligned with local strategies, policies and plans. These include partnership working with representatives from Moray Health and Social Care Partnership, Development Planning, Community Planning and local housing providers and developers



- **Strategic governance:** The Moray LHS development process has been led by the LHS Steering Group which provides a multi-agency governance framework for the development and implementation of the LHS. Representatives include partners from Moray Council, (Housing, Planning, Homelessness, Private Sector and LHEES teams), Registered Social Landlords and HSCP partners.

To maximise participation in the LHS Consultation Plan, a creative approach was deployed, offering a range of engagement and consultation opportunities. Where possible, digital platforms and channels were utilised to enable partners and stakeholders to take part, whilst offering alternative options for stakeholders who required person-led options. The advancement of virtual consultation methods has been effective in providing new ways to engage with partners and to expand the digital audience of the LHS. The extent and nature of the LHS Consultation Plan can be summarised as follows:



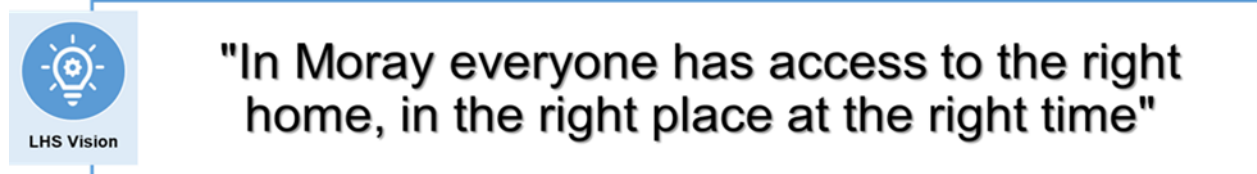
## 1.4 Local Housing Strategy Vision, Outcomes and Priorities

Housing to 2040 sets out the national vision for housing in Scotland and places housing firmly at the centre of other national objectives including tackling poverty and inequality, creating and supporting jobs, meeting energy efficiency and fuel poverty targets, tackling the climate emergency and creating connected, successful communities.

The LHS vision therefore places housing at the centre of strategic ambitions for Moray including the objectives to grow the economy and population, regenerate communities and reduce inequalities. The LHS vision includes:

- enabling people who want to live in Moray and support a growing economy to find suitable and affordable housing, whilst ensuring the needs of the current population are met effectively
- providing more homes in sustainable rural places where connectivity to jobs and local services is easy
- improving housing choice, easing housing affordability pressures and maximising the effectiveness of the existing housing stock
- supporting people to live independently and well at home, even if their needs change
- ensuring everyone finds it easy and affordable to heat and to maintain their home in a good state of repair

Co-produced with LHS delivery partners, stakeholders, local residents and communities, the 2025-2030 Local Housing Strategy vision for Moray is that:



To achieve this vision and tackle the main priorities for action identified by local residents, partners and stakeholders, the following four LHS priorities have been defined:

<b>Priority 1</b> Building more homes creates sustainable communities and enables economic growth	<b>Priority 2</b> Making better use of existing homes prevents homelessness and improves housing options and choice	<b>Priority 3</b> Partnership working maximises housing's role in improving health and wellbeing	<b>Priority 4</b> Improving property condition and achieving affordable warmth is enabled in all homes
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The evidence, key issues and actions for each LHS priority are set out in Chapters 5 to 8 of the LHS. Guiding the delivery of the LHS are the principles set out by the Christie Commission on the Delivery of Public Services in Scotland. These include commitments to collaboration, efficiency, innovation, prevention, and tackling inequality.



The LHS Steering Group will build on the strong partnerships already in place, recognising that achieving LHS priorities will require a collective effort from delivery partners, stakeholders, communities, and the people of Moray.

## 2 Local Housing Strategy Context

It is important that the LHS supports and helps deliver national housing outcomes and targets, whilst also reflecting the local needs and priorities set out in the Local Outcomes Improvement Plan (2017-27).

The LHS is therefore set within the wider Community Planning framework for the Council and its partners. On this basis, the LHS defines the housing contribution to local strategic priorities and provides a framework for meeting the targets set out in Scotland's first national Housing Strategy: 'Housing to 2040'. The national and local strategic framework that will support and enable LHS delivery is set out in more detail below.

### 2.1 Strategic Context for Housing in Scotland

#### Housing to 2040

Housing to 2040 is Scotland's first ever long-term national housing strategy providing a vision for what housing should look like and how it will be provided to the people of Scotland, no matter where they live and what point in their life they are at.

The strategy is developed around four themes which focus on increasing supply, enabling affordability and choice, decarbonising homes and enhancing housing quality.



1. More homes at the heart of great places
2. Affordability and choice
3. Affordable warmth and zero emissions
4. Improving the quality of all homes

Housing to 2040 makes a commitment to increase housing supply by setting an ambitious target to deliver 100,000 affordable homes by 2032, with at least 70% of these for social rent. The strategy sets out a specific vision for achieving:

- A well-functioning housing system
- High quality, sustainable homes
- Sustainable communities
- Homes that meet people's needs

#### National Performance Framework

The Scottish Government's National Performance Framework provides a vision for 'A Scotland that is *wealthier and fairer, smarter, healthier, safer and stronger and greener*'.

It provides a framework which includes seven high level targets for public services to work towards including:

1. Growth
2. Productivity
3. Participation
4. Population
5. Solidarity
6. Cohesion
7. Sustainability



LHS outcomes in Moray align well to the National Performance Framework Vision and make strong contributions to the targets set under the growth, participation, population, cohesion and sustainability elements of the framework.



## Fourth National Planning Framework (NPF4)

In January 2023, the Scottish Government approved a new spatial plan for Scotland that will look ahead to 2050. The fourth National Planning Framework (NPF4) sets out a vision for what Scotland, as a place, could and should look like in 2050. This includes national planning policies and provides a plan for future development in Scotland.

**Driven by the overarching goal of addressing climate change, this long-term strategy will focus on achieving four key outcomes:**

1. Net zero emissions
2. A wellbeing economy
3. Resilient communities
4. Better, greener places



The LHS has been informed by the themes and aims set out in NPF4. Concepts such as 20-minute neighbourhoods, the Place Principle, prioritising brownfield development and a fabric first approach to decarbonising homes and communities; all feature within action points to deliver Moray LHS outcomes.

Furthermore, the LHS has been informed by evidence from the 2023 Housing Need & Demand Assessment. The 2023 HNDA provides housing estimates for each of the six Housing Market Areas that operate across Moray as the basis for setting Housing Supply Targets in the LHS and Housing Land Requirements in the Local Development Plan (LDP).

In implementing the new National Planning Framework for Scotland, Moray Council set a 'minimum all tenure housing land requirement' (MATHLR) in June 2021, following Scottish Government consultation on the spatial strategy for NPF4. The MATHLR took into consideration:

- housing system evidence including estimates of existing housing need
- housing delivery targets aligned to Strategic Housing Investment Plans (SHIP)
- Local strategic drivers for housing delivery, as well as historic evidence of the rate of housing completions in Moray.

MATHLR targets set a minimum threshold for housing land allocations within the next Moray Local Development Plan.

**The proposed Minimum All Tenure Housing Land Requirement set for Moray for the next 10 years is 3,450 units.**

Setting the MATHLR does not impact on the requirement to develop Housing Supply Targets within the LHS using the housing estimates produced by the HNDA as a starting point. In preparing this LHS there has been close partnership working between housing and planning colleagues to ensure that housing delivery and land use planning principles are informed and well aligned.

## 2.2 Strategic Context for Housing in Moray

It is important that the LHS should be closely aligned with Moray Local Outcomes Improvement Plan (2017-27), as well as supporting a range of other local plans and



strategies which set ambitions for the people of Moray. Key strategic plans and documents which align to LHS priorities are set out below.

### The Moray Local Outcome Improvement Plan

Moray's Local Outcome Improvement Plan (LOIP) provides a framework for community planning partners to address key priorities and improve outcomes for people in Moray. The LOIP focuses on areas where Moray faces the poorest outcomes, ensuring these are central to partners' corporate plans, strategies, and policies. The LOIP's vision for Moray is:



**“Raising Aspirations through Expanded Choices,  
Improved Livelihoods and Wellbeing”**

The partnership identified the following four main priority areas to guide their work and deliver this vision:

- Developing a diverse, inclusive and sustainable economy
- Building a better future for our children and young people in Moray
- Empowering and connecting communities
- Improving wellbeing of our population.

The LHS sets the delivery framework for contributing to community planning partners' ambitions by:

- Tackling fuel poverty to improve livelihoods
- Building more homes in connected places to support a growing economy
- Providing increased housing options for older people and people with disabilities where people can live well.

### Moray Council Corporate Plan 2024-29

The Moray Council Corporate Plan was adopted in February 2024 and sets out what the Council wants to achieve for Moray. The vision in the Moray Council Corporate plan is **“a Moray where people prosper, free from poverty and inequality”**.

The Plan details how the priorities set out in the Local Outcomes Improvement Plan, will be brought to life by Moray Council through the priorities to:

- Tackle priorities and inequality
- Build a stronger, greener and vibrant economy
- Build thriving, resilient, empowered communities.

Key actions include reducing child poverty and health inequalities, delivering the Moray Growth Deal and shaping places that people want to live in, visit and invest in.



### Moray Economic Development Strategy 2022-32

The Moray Economic Partnership developed a 10-year strategy to allow Moray to take advantage of the opportunities that exist and build an increasingly prosperous and resilient economy along with communities that are strong, sustainable and more equal. The strategy's vision is to see Moray as:



**“A distinctive and attractive place to live, work, operate a business or social enterprise, study and visit”**

The strategy identifies seven strategic outcomes that need to be achieved to transform Moray's economy over the 10 years and includes:

- delivery of the Moray Growth Deal
- maximising the environmental, social and economic benefits of the transition to net zero and Community Wealth Building.
- a labour market that provides the required numbers of workers to take advantage of available opportunities-notably attraction and retention of those aged 16-29.
- increased productivity leading to growing wages and contributing to closing the gender pay gap.
- ensuring alignment between skills provision and the changing economy.
- increasing employment levels and number of companies.

The LHS will play a pivotal role in the delivery of the ambitions of the economic strategy through supporting a growing labour market by the provision of new homes, increasing housing solutions for key workers, promoting career opportunities in the construction sector as well as increasing the capacity of this vital sector, encouraging apprenticeship opportunities for young people to aid retention of this demographic and promoting the benefits of net zero home improvements.

### Moray Growth Deal and Economic Strategy

The Moray Economic Strategy 2022 – 2032 projects the impact of the Moray Growth Deal initiatives. The main objectives of the Moray Economic Strategy are to grow and diversify the economy with a focus on 4 outcomes:

- **Outcome 1:** Qualification Levels – An increase across all ages and genders in qualifications relevant to growth sectors
- **Outcome 2:** Small Business Growth – More small and medium-sized businesses employing between 10 and 100 people
- **Outcome 3:** Talent Attraction, Retention and Return – More skilled, higher paid jobs that deliver net in-migration in the 16-29 age range
- **Outcome 4:** Business Competitiveness – An increase in capital investment and focused workforce development to strengthen competitiveness.



### Moray Local Development Plan

Work on the new Moray Local Development Plan (LDP) has started and is expected to be adopted in 2027. The LDP will shape how land and buildings are used over the next 10-20 years which impacts on people's lives including work, travel, access to open space, play and health.

The first key stage of preparing the new Moray Local Development Plan 2027 was met with Moray Council agreeing the Evidence Report in April 2024. The Evidence Report was subsequently submitted to Scottish Ministers and subject to the new Gate Check procedure. Notification was received from the Reporter, appointed by Scottish Ministers, in August 2024 that the Evidence Report was sufficient to enable the Council to prepare its LDP.

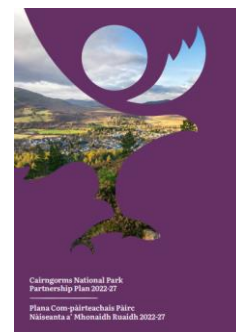
The Housing Section of the LDP Evidence Report was informed by the Moray Housing Need & Demand Assessment, which was signed off as robust and credible by the Scottish Government's Centre for Housing Market Analysis (CHMA) in December 2023. HNDA evidence was to underpin a Local Housing Land Requirement (HLR) for Moray, which passed the reporters Gate Check at first submission, providing a starting point for land-use planning for housing in the new LDP.

The Evidence Report for the Moray LDP 2027 set out housing delivery and HLR targets based on the HNDA 'genuine growth scenario', with 4,500 housing units to be delivered over the next 10 years. On this basis, the following annual targets have been set:




### Cairngorms National Partnership Plan 2022 - 2027

[The Cairngorms National Partnership Plan 2022–2027](#) sets a strong focus on increasing affordable housing within the National Park, particularly for key workers and to address local affordability pressures. The Plan includes an ambition that by 2030, 75% of new homes will be delivered as affordable housing across a range of tenures. As a statutory plan approved by Scottish Ministers, it shapes the policy framework for all public bodies operating in the Park and therefore forms an important part of the strategic context for Moray's Local Housing Strategy.



## Moray Health and Social Care Partnership Strategic Plan – Partners in Care 2022-2032

Moray's Strategic Plan for Health and Social Care sets this vision for the next ten years:



**“We come together as equal & valued partners in care to achieve the best Health & Wellbeing possible for everyone in Moray throughout their lives”**

The vision is underpinned by three strategic themes: Building Resilience; Home First; and Partners in Care, where effort will be directed and the following seven objectives are aligned to these themes:


- We focus on prevention and tackling inequality
- We nurture and are part of communities that care for each other
- We work together to give you the right care in the right place at the right time
- We help build communities where people are safe
- We are an ambitious and effective partnership
- We are transparent and listen to you
- We make a positive impact beyond the services we deliver



These objectives align well to the LHS which will focus on reducing inequality by enabling affordable warmth and economic growth, by preventing homelessness and maximising housing's role in improving health and wellbeing.

## Local Heat & Energy Efficiency Strategy 2023-28

The Local Heat and Energy Efficiency Strategy (LHEES) 2023-28 is at the heart of a place based, locally led and tailored approach to the decarbonisation of heat in buildings. This strategy underpins an area-based approach to heat and energy efficiency planning and delivery. It was developed in collaboration with key stakeholders across Moray and sets out the long-term plan for decarbonising heat in buildings and improving their energy efficiency. The vision for this strategy is to:



**“Support Moray’s just transition to a sustainable and climate resilient community by improving building energy efficiency and decarbonising heat sources”**



Seven priorities form the basis of the strategy and delivery plan:

- building sustainable and climate resilient communities
- maximising knowledge and awareness and ensuring certainty of success
- a just transition for the energy system
- supporting a wellbeing economy, jobs and skills
- tackling fuel poverty and improving health
- improving the energy efficiency of buildings
- decarbonising building heat sources

20% of Moray's CO<sub>2</sub> emissions are estimated to come from the domestic sector, where there has already been a 46% reduction since 2005, largely from reductions in domestic electricity. The LHS will support the LHEES through continuing the work to improve energy efficiency in homes, improve property condition, achieve affordable warmth and decarbonise domestic heat sources.



### 3 Equalities Impact and other Assessments

The Council has a statutory obligation to ensure that all its functions and activities are exercised in full compliance with the requirements of the Equalities Act 2010 and the Fairer Scotland Duty. Equality is at the heart of Moray's Local Housing Strategy, with a commitment to equality and an understanding of diversity at the heart of delivering LHS priorities and actions outcomes. The Council aims to ensure that all services meet the needs of everyone who lives, works or visits Moray and will continue to work with communities to ensure this can be achieved.

The LHS [Integrated Impact Assessment \(IIA\)](#) sets out how the Council has addressed and seeks to mainstream issues of equality in delivering the LHS. This assessment confirms that the LHS has been developed in full accordance with the principles of equality and diversity and actively promotes inclusion. It acknowledges the crucial role of housing and housing services in the delivery of improved outcomes to all people and communities in Moray.

#### Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) is a systematic method of considering the effects on the environment of a plan or programme with the aim of helping to reduce or avoid environmental impacts. An SEA is a requirement of the Environmental Assessment (Scotland) Act 2005. The objective is to provide a high level of protection for the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

Given the LHS and the Development Plan are aligned, notification is required to be submitted to the SEA Gateway. This states that the LHS is not required to undergo SEA. This is because decisions relating to HSTs and associated land allocations, have already been considered through the Evidence Report supporting the development of the new Moray Local Development Plan. The Development Plan has been the subject of a SEA and it concluded it does not contain policy options, or proposals, that will have a significant adverse environmental impact.



## 4 The Housing System in Moray

Moray is located in the north-east of Scotland and is the eighth largest of 32 local authorities in Scotland by geographical area, covering approximately 2,200 square kilometres incorporating the Moray Firth coastline, the broad lowlands further south, and the more mountainous area that is part of the Cairngorms National Park. Moray has a low population density of 39 persons per square km, ranking the 7<sup>th</sup> smallest local authority for population.

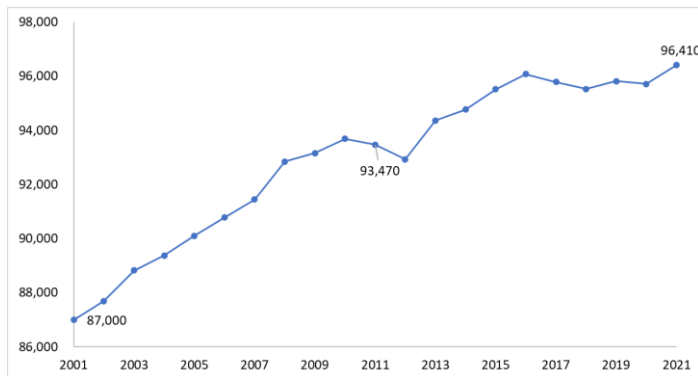
A complex mix of factors and issues influence the operation of the housing system in Moray. Informed by analysis of the local housing system, the LHS develops a framework for improving housing outcomes for everyone in Moray by tackling housing system imbalances. Key drivers which influence how the housing system is operating, such as population change, household projections and the performance of the Moray economy are set out in more detail below.

### 4.1 Population and Households

#### Population and Households

Between 2001 and 2011, there was a sustained increase in the Moray population of 7%, from 87,000 in 2001 to 93,470 people in 2011.

**Chart 1: Moray Population 2001-2011 (NRS Mid-Year Population Estimates (June 2021))**



Over the last 20 years, population growth in Moray (11%) has outstripped increases in the Scottish population over the same period (7%).

However, the rate of population growth has slowed since 2011 to 3.1%, which is closer to the national increase of 3.4% over the same period.

Despite these trends, Moray’s population growth is expected to reverse between 2018 and 2043 with a projected decline in the population of -2.7%, which is an average annual decrease of 102 people. This compares to a projected increase in Scotland’s population of 2.5% over the same period.

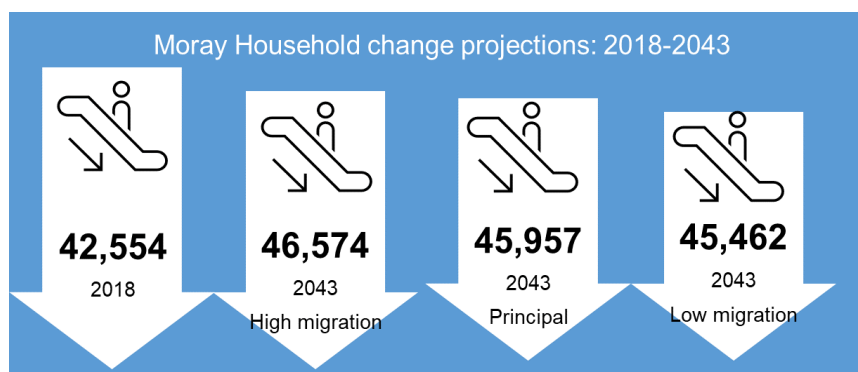
In 2023, the population of Moray was estimated at

**94,670**  
people

Alongside population trends in Moray, the LHS analyses the potential housing impacts of changes in the number and types of households living in the area aligned to future household projections. In 2023, there were an estimated 43,891 households living in Moray, an increase of 7.7% since 2013. This growth is higher than the national rate, with households increasing by 5.9% across Scotland over the same period.

In September 2020, National Records of Scotland (NRS) published household projections for every local authority, based on 2018 population estimates. The projections include a principal scenario and variants based on alternative assumptions about migration trends (both high and low).

All three scenarios show a projected increase in the number of households in Moray between 2018 and 2043 ranging from an increase of 6.8% under a low migration scenario (42,554 to 45,462 households), to 7.9% under the principal scenario (42,554 to 45,957 households) and a 9.4% increase under a high migration scenario (42,554 to 46,574 households).



Under the principal scenario, during the life of the LHS (2025-2030), the number of households in Moray is projected to increase by 1.4% from 44,228 to 44,848. Over the next decade (2025-2035) household numbers will increase by almost 2.5% from 44,228 to 45,313.

### The Ageing Population in Moray

Although the population of Moray is expected to decline over the next ten years, this is against the backdrop of an ageing population. Between 2023 and 2033, the older population is expected to grow substantially as people live longer, whilst younger and working age populations are expected to decline. The working age population is projected to decrease by -6% between 2023 and 2033 whilst the 65+ age cohorts will increase by 21% overall.

**Table 1: Moray Population Change 2023 – 2033 by Age**

	2023	2033	Moray % Change	Scotland % Change
Children <16	15,224	13,117	-14%	-8%
Working Age Population 16-24	57,971	54,228	-6%	-2%
Pension Age 65-85+	22,554	27,370	21%	20%
Total Population	95,749	94,715	-1%	1%

**Source: Population Projections (NRS) 2018-Based**

The declining working age population could have a major impact on the sustainability of local communities in Moray. Undoubtedly, the reversal of economic decline and depopulation will depend on Moray’s ability to attract and retain a working population, aligned to the delivery framework of the Moray Growth Deal.

Moray has a higher life expectancy than the rest of Scotland, and it is projected that the rate of increase in the older population will continue with the 85 and over age group expected to increase by 87% between 2023 and 2043 in Moray. As a result, the ageing population of Moray will require housing, health and social care interventions that enable the growing older population to live independently.

Innovative solutions will be required to enable older households to 'Age in Place'. The report "Housing and Ageing: Linking Strategy to future delivery for Scotland, Wales and England 2030", recommends that housing should play a central role in the provision of services for older people. It also calls for new adaptable and affordable housing to be built; investment in early intervention; and meaningful consultation with older people to ensure there is suitable housing and services for individuals to continue living independently at home, whilst maintaining their connections with people and place.

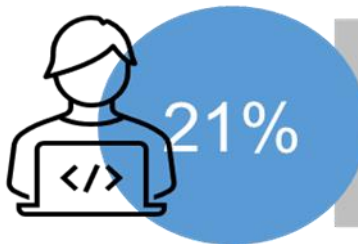


There is increasing recognition that planning for housing in later life is about ageing in place and staying in the home of your choice for as long as possible. Increasing the supply of accessible and adapted housing in Moray will be a fundamental part of promoting independence, flexibility and social inclusion. This can only be achieved by building accessible dwellings or by adapting the existing housing stock to meet the needs of Moray's older people as they age.

## 4.2 The Moray Economy

### Economic Profile

The Moray economy is characterised by higher employment rates than Scotland (79.3% compared to 76.6% in September 2024), with unemployment rates slightly lower (2.4%) than is the case nationally (3.1%). Lower numbers of the workforce in Moray are in full time employment (61%), when compared with Scotland (67%), with 39% working part-time.



of the Moray population are economically inactive, lower than for Scotland at 23% (Sept 2024)


Rates of long-term sick households (23%) are lower than in Scotland (35%), with the proportion of retired households (24%) significantly higher than Scotland (14%)

The Moray economy relies predominately on micro businesses, with 87% of local businesses employing less than 10 people with large employers (organisations employing 250+ employees) accounting for just 0.5% of the local economy. A significant proportion of Moray's workforce are engaged in public sector employment (33%), with the largest economic sectors including health and social work and manufacturing (16.7% respectively), followed by wholesale and retail jobs (13.9%).

Economic output in Moray has historically been lower than the wider Scottish economy. In 2022, Gross Value Added (GVA) in Moray was £58,963 per head, 13% lower than the Scottish average of £67,476. Having said this, GVA has fluctuated in Moray and Scotland over the last decade, with an 8% growth in Moray over the last decade in comparison to a

34% increase across Scotland. However, despite recent growth in productivity over the last decade, current projections anticipate GVA to stagnate with an 0.8% growth between 2024 and 2031, compared to Scotland at 1.2% across the same period.

There is evidence of low household incomes in Moray, with poorer paid local employment impacting on the ability of local households to meet housing costs. Incomes and weekly wages in Moray and lower than the Scottish equivalents.

<p><b>Whilst the Moray economy is characterised by low unemployment levels, income inequalities are evident, with 32% of the household population earning less than £25k per annum and 46% earning more than £40k</b></p>	 <p>The average annual median income in Moray (£37,277) is 5% lower than in Scotland (£39,386) Source: CACI 2024.</p> <p>Full-time weekly wages across Moray (£688) are notably lower than Scotland (£739).</p>
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Over the last decade, Moray's economy has faced significant disruption due to events such as the pandemic, Brexit, the war in Ukraine, and the cost-of-living crisis. To address this, the UK Government's 'Levelling Up in Moray' fund focuses on investing in high value local infrastructure and building stronger, more resilient local economies and communities. Moray Council successfully applied for funding in the third round of the Levelling Up Fund for the Elgin City Masterplan, receiving notification in November 2023 that Moray had been awarded £18M. One of the five projects supported by this funding, has a strong housing component – The South Street Regeneration Project. This mixed-use project will see the transformation of redundant commercial buildings in Elgin town centre and the creation of 38 1 and 2 bed flats, a business enterprise hub and retail units, and high-quality public realm.

Furthermore, to mitigate the economic challenges faced by the Moray economy, the £100M Moray Growth Deal announced by the UK and Scottish Governments in 2021 sets a blueprint for economic transformation and growth. The deal will deliver transformational investment to grow the Moray economy by investing over £100M in eight strategic projects that will maximise Moray's future economic competitiveness. The Growth Deal will promote activity to address key growth challenges to:

- retain and attract young people/families (16-29yrs) to live and work in the area
- address occupational segregation and gender inequality in employment including the significant gender pay gap, and under-employment issues for women
- create new high-quality jobs in existing sector and diversify the region's economy into new high value areas
- create opportunities across Moray which will help secure the future prosperity of its many communities

It is estimated that the Moray Growth Deal will:

- directly and indirectly create over 3500 jobs associated with the economic benefits accrued from growth deal projects, with 450 jobs will be directly created as part of growth deal project delivery
- attract an additional 50,000 tourists
- construct over 300 affordable new homes



- support 450 businesses to scale up to increase the value of the Moray economy by £82M
- create new and improve existing facilities for businesses
- create an enhanced culture and leisure offering for local people to make Moray a more attractive place to live and work.

Full details available at [The Moray Growth Deal | MyMoray](#)

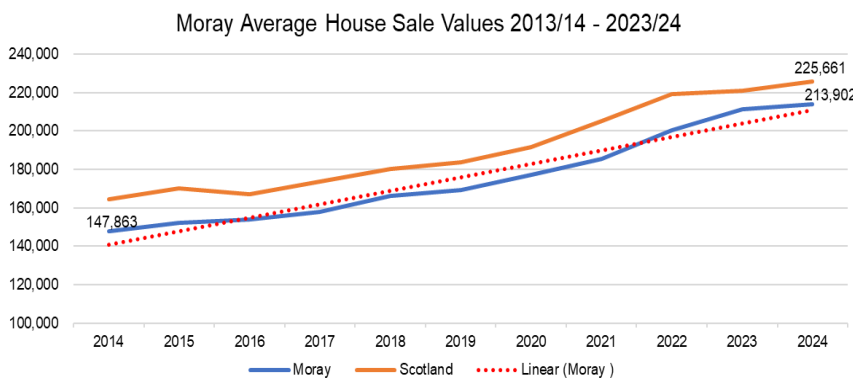
It is important that housing investment is maximised as part of the wider economic development strategy for Moray. Housing and economic growth are inextricably linked, and a lack of suitable housing can be a barrier to key sectors of the economy being able to recruit and retain staff to grow their businesses and in turn grow the local economy.

The creation of 3,500 jobs as part of the Moray Growth Deal will necessitate a growth in housing supply to enable business recruitment and in-migration into Moray, ensuring that the essential incoming workers can access suitable, affordable accommodation. The capacity of the housing construction sector and appetite of private developers will also have a major impact on the ability to achieve Moray’s economic ambitions.

### The Moray Housing Market

Moray has experienced significant fluctuations in housing market activity rates in the last decade. Overall, sales have decreased by 10% in the last 10 years from 1,777 sales in 2014 to 1,599 in 2024. This contrasts with a national growth in house sales of 5% over the last decade.

#### Chart 2: Average House Sale Values in Moray



In 2024, the average house price in Moray was £213,902, which is 5% below the Scottish average at £225,661. Having said this, between 2014 and 2024, house price inflation grew at a faster rate across Moray (31%) than Scotland at 27%.


Analysis of housing affordability in Moray reveals that there are clear affordability pressures locally, particularly for those on low household incomes. The average income in Moray in 2024 was £45,307 per annum, 7% below the Scottish average at £48,657. In fact, 32% of Moray households earn less than £25,000 per annum with lower quartile incomes of £21,221. Benchmarking local incomes to housing market values, suggest that households must spend up to 4.7 times the average income to afford the average Moray house price. This is well in excess of the typical 3.9 X's multiplier typically used for lending purposes.



Moray (2024 CACI & ROS Data)	Income	House Price	Affordability Ratio
Average house price/income	£45,307	£213,902	4.7
Median house price/income	£37,277	£190,000	5.1
Lower quartile house price/income	£21,221	£133,000	6.3

**Table 2: Moray Mortgage Affordability Ratio 2024**

For households on lower incomes, housing affordability is particularly challenging with analysis revealing that households must spend 6 times lower quartile incomes to purchase a home at the market entry level price in Moray.



**Affordability is extremely challenging at market entry level**

Using the Scottish Government's methodology to test market entry (benchmarking lower quartile incomes to lower quartile house prices), reveals that households must spend over **6.3 times** their income to purchase a home.

Home ownership is out with the reach of local households on lower incomes, which is particularly challenging given the dominance of home ownership in the area.

Housing system evidence of poor housing market accessibility in Moray is echoed by local residents. As part of the LHS early engagement survey, residents were asked to rank the top housing challenges currently facing households in the Moray area. The top ranking challenge defined by respondents relates to the lack of affordable housing options in Moray, with 57% selecting the statement 'local people are unable to afford either to buy or rent the type of housing they want'. This was followed by 46% suggesting that the housing shortage was a catalyst for poor housing affordability, with 46% suggesting that 'there is not a good supply of housing available to meet the needs of local people'.

57%

Local people are unable to afford either to buy or rent the type of housing they want

### 4.3 Moray Housing Stock

There are approximately 43,000 residential homes in Moray to meet the needs of the local population.

The housing system in Moray is dominated by owner occupation, with a greater proportion of homes in this tenure (67%) than is the case nationally (63%). In contrast, the social housing sector accommodates just 19% of local households, lower than the Scottish average at 22%.

	Moray	Scotland
Owner Occupied	67%	63%
Private Rented Sector	14%	14%
Social Housing	19%	22%
Total	100%	100%

Census 2022: Housing Tenure analysis

The value of household incomes in Moray makes affordable housing options central to meeting housing need, and particularly so for working age households who have no eligibility for social housing. Demographic projections which project a decline in the working age population in Moray, make it increasingly important that a wide range of quality housing options are available for working people to realise Moray's economic regeneration and growth strategy.

The private rented sector (PRS) in Moray accounts for 14% of the housing stock, which is consistent with the Scottish average (14%). There are currently approximately 5,000 properties registered under the private landlord registration scheme (March 2025). However, in the last 18 months, the PRS in Moray has shrunk by up to 4%, slightly less than Scotland (9%) over the same period. National research by the Scottish Association of Landlords suggests that landlords are leaving the sector due to rent controls and new investment and tenancy standards. A shrinking private rented sector in Moray risks a further reduction in rented accommodation options for those who cannot access the housing market, with potential PRS rental inflation a further negative consequence.

There is evidence that the cost of private renting is already out of reach for low-income households in Moray. A household will require to earn up to £32,900 to be able to afford the average PRS rent if they devote 30% of their income to housing costs, with 42% of Moray households unable to afford on this basis. This is significantly beyond lower quartile incomes in Moray (£21k) rendering PRS rents out of reach for low-income households.

The PRS is an important translational and flexible tenure option to those who are not eligible for social housing and cannot afford access to the housing market. Whilst the PRS in Moray could play an important role in meeting housing need if investment to secure growth and improvement can be achieved; there are questions regarding the extent to which the PRS reforms may influence future investment in this sector. As the PRS plays a key role in the Moray housing system, the new LHS will consider how to enhance PRS housing options including the potential to deliver more key worker housing as the basis of economic growth.

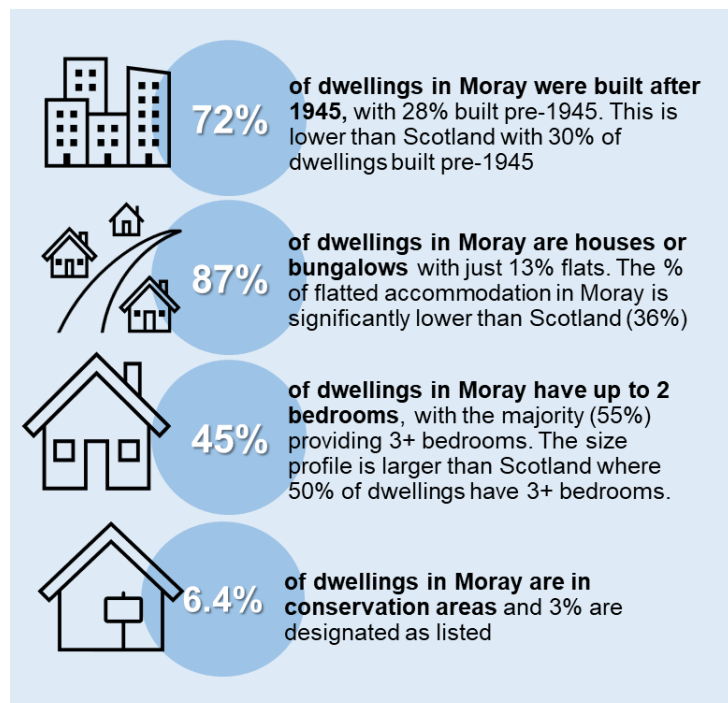
### Moray Dwelling Profile

**There are approximately 43,000 residential homes across Moray.**

The dwelling profile in Moray is characterised by properties that are newer, low rise and bigger in size than is typically the case across Scotland.

The age profile of the current housing stock is relatively new with 72% of dwellings in Moray built after 1945, higher than the Scottish profile at 70%. The proportion of Moray's older homes varies considerably across housing market areas (HMAs) with the Cairngorms National Park having 45% of properties built pre-1919, in comparison to just 17% in Elgin.

87% of all dwellings in Moray are houses or bungalows, with just 13% flats. This is a significantly lower proportion than is the case in Scotland where 36% of dwellings are flatted. Furthermore, 45% of dwellings in Moray





have up to 2 bedrooms which is a slightly lower proportion than is the case for Scotland at 50%.

There is a growing mismatch between the needs and aspirations of local households and the profile of homes available in Moray. Whilst 55% of homes across Moray offer 3+ bedrooms, the growing population of smaller and single person households across Moray raises questions over a growing mismatch of households to homes by property size.

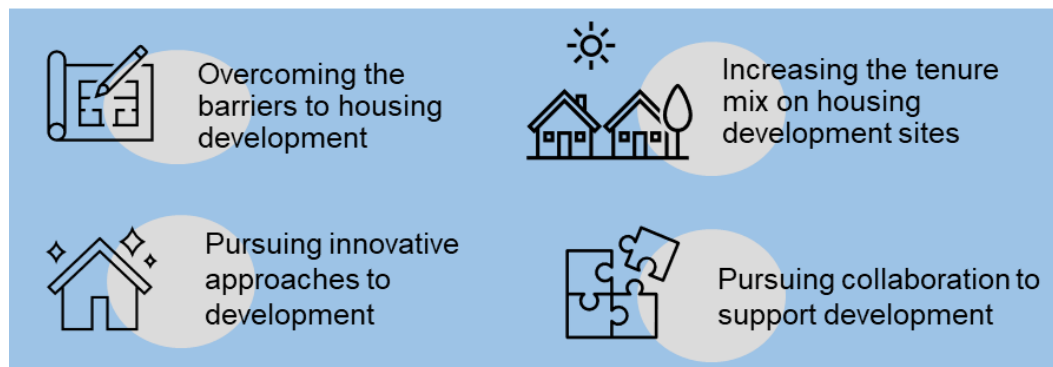
## 5 LHS Priority 1: Building more homes creates sustainable communities and enables economic growth

The LHS is an all-tenure strategy which considers current and future housing need, setting a strategic vision for housing across both public and private sectors. Providing a better profile of housing by size, type and tenure, in sustainable, well-connected places is a fundamental aim of the Local Housing Strategy and crucial to the delivery of the Local Outcomes Improvement Plan and ambitious economic development agenda.

Aligned to providing quality homes in connected places, the LHS is required to provide evidence and policy direction in relation to:

- the extent and nature of housing need and demand across Moray
- defining a generous supply of effective housing land to enable the delivery of Housing Supply Targets
- the strategic direction for housing investment in Moray, including the Strategic Housing Investment Plan and wider regeneration activity
- efficient and innovative ways of financing the development of new housing delivery models
- the creation of connected and sustainable local places which are well connected to jobs, amenity, community infrastructure and quality green space.

Informed by analysis of the main issues and housing system drivers, LHS Priority 1 focuses on **‘Building more homes to create sustainable communities and enable economic growth’** in Moray by:



Chapter 5 sets out the evidence base and outlines what Moray Council and partners will do to address the main challenges to enhance housing supply, tenure diversity and promote placemaking. It concludes with LHS priority actions for partnership, investment and delivery activity.

### 5.1 LHS Priority 1: What’s our Starting Point?

A detailed briefing which sets out the housing system evidence underpinning LHS Outcome 1 can be accessed here: [Priority 1 Interactive Briefing](#)

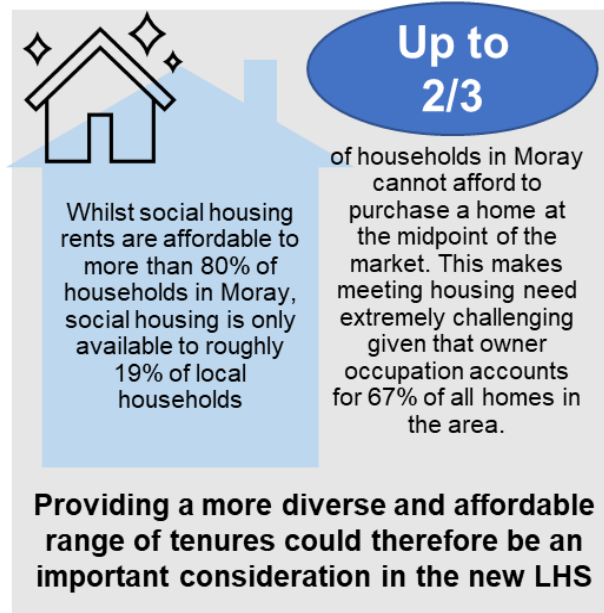


There are over 9,000 units of affordable housing across the Moray area, 8% of which (699 units) become available for letting every year.

Demand for affordable housing in Moray clearly outstrips supply with roughly 5 applicants for every social tenancy that becomes available. There are clear pressures for 1 bedroom and 4+ bedroom homes across most housing market areas with up to 8 applicants for every tenancy. Ratios of waiting list applicants to available homes shows clear pressures in the Elgin and Forres HMAs. Whilst 3,500

households have expressed demand for social housing, 25% are assessed as having no housing need.

As part of the insight to inform the LHS, the Council carried out housing affordability analysis to test the value of local incomes to meet housing costs across a range of housing tenures. The analysis evidences the affordability pressures faced by local households when devoting 30% of household income to housing costs.



**Up to 2/3**

of households in Moray cannot afford to purchase a home at the midpoint of the market. This makes meeting housing need extremely challenging given that owner occupation accounts for 67% of all homes in the area.

Whilst social housing rents are affordable to more than 80% of households in Moray, social housing is only available to roughly 19% of local households

**Providing a more diverse and affordable range of tenures could therefore be an important consideration in the new LHS**

The average income in Moray is £45,307, which is 7% lower than the Scottish average (£48,657). It was also found that 32% of households earn less than £25k per annum with lower quartile incomes at £21,221. In November 2024, the average house price in Moray was £198,000.

A household requires to earn up to £32,900 to be able to afford the average PRS rent if they devote 30% of their income to housing costs, with 42% unable to afford these market rents. Furthermore, households require to earn £37,406 to afford the lower quartile house price (£133,000) with 48% able to afford these market entry prices. This is extremely problematic given the dominance of owner occupation as a housing option in the Moray area.

During the life of the LHS, a need for approximately 3,500 new homes is estimated across Moray. Over 40% of this requirement is for market housing options, with up to 60% of housing estimates focused on the delivery of affordable housing. It is estimated that roughly 6,700 new homes will be needed in the next 20 years



To produce the evidence required to calculate local housing and land requirements over the next 20 years, Moray Council has produced a Housing Need & Demand Assessment (HNDA) which was signed off as robust and credible by the Scottish Government's Centre for Housing Market Analysis in December 2023.

The HNDA tool works by projecting forward the number of new households who will require housing in Moray. This is based on household projections produced by the National Records of

Scotland (NRS). The number of existing households who need to move to more suitable housing is also included. Economic scenarios are then applied to calculate housing affordability so that total housing estimates can be split into housing tenures.

The baseline projections for Moray assume the number of households will grow by 6% under the NRS high migration scenario over the next 20 years, which is in contrast to a 22% growth over the last 20 years and a transformational economic development strategy that could generate up to 3,500 new jobs. To address this, housing estimates are based on a 10% growth scenario over the next 20 years and an increase of over 4,500 households. Total housing estimates up to 2042 are calculated at 6,730 homes.

Over 40% of this housing requirement is for market housing options, with around 60% of housing estimates focused on the delivery of affordable housing, including 44% on social housing and a further 13% on below market rent options such as shared ownership/equity and mid-market rent.



**6,730** New homes required in the next 20 years

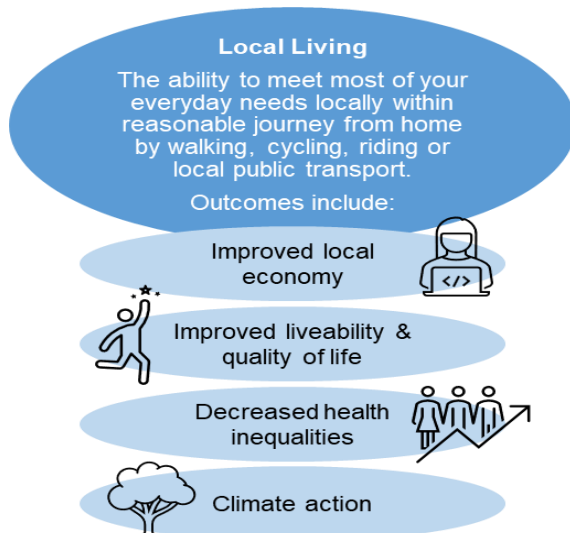
HNSA estimates provide evidence to inform local decision making on setting Housing Supply Targets in the Local Housing Strategies. This will guide decisions in the Local Development Plan on ensuring there is a generous supply of land for housing.



Local Living aims to enable people to meet most of their daily needs within a reasonable walking, wheeling or cycling distance of their home, to help places become healthy, sustainable and resilient. The Local Development plan encourages the delivery of Local Place Plans (LPPs) produced by communities can help to express local aspirations and ambitions for the future. LPPs are intended to identify gaps in local services, develop local connections, improve health and wellbeing, tackle inequalities, and form a response to the climate emergency.

Realising local living in Moray will involve creating a sustainable and community focused approach that considers the unique challenges and opportunities of both urban and rural communities.

A tailored approach will therefore be required to make Local Living a reality, for example, by looking holistically at rural settlements and the need to cluster services across wider areas. This approach will allow for gaps to be identified regarding service provision to meet the needs of local communities. The concept of local living is therefore not limited to urban areas, with the local development planning framework committed to delivering specific community led solutions for residents in rural areas. By improving transport options and developing more integrated services, including digital connections and amenities, Moray communities (both urban and rural) can create more sustainable and liveable communities that meet the needs of their residents.



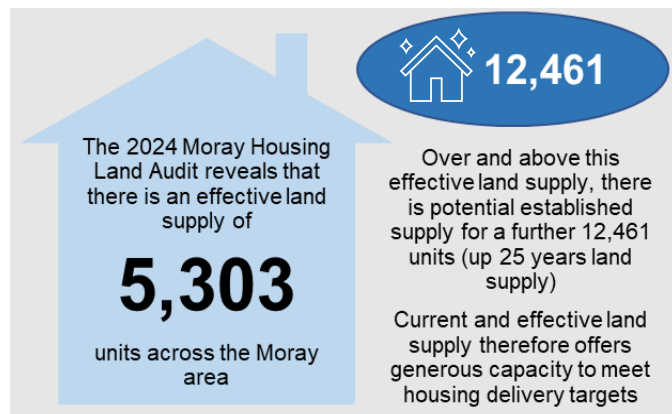


The Strategic Housing Investment Programme (SHIP) in Moray has the capacity to deliver 785 affordable homes if funding from the Scottish Government is made available. The SHIP sets out the investment priorities for affordable housing over a 5-year period. Developed in partnership between the Council, the Scottish Government and local RSLs, it details the housing projects which require funding from the Scottish Government’s Affordable Housing Supply Programme.

Moray Council have a very strong track record of enhancing the annual funding provided by the Scottish Government by attracting slippage funding from other local authority areas in the national Affordable Housing Supply Programme. Over the last 5 years, Moray Council have been allocated £42.7M of Affordable Housing Supply Programme funding through the Resource Planning Assumption process. Over the same period, Moray Council have been successful in boosting this allocation by 18%, with investment of £50.3M achieved in affordable housing development projects. The Council will continue to maintain a healthy programme of deliverable projects in order to continue this additionality to grant funding during the course of the 2025-30 LHS.

The Evidence Report for the Moray Local Development Plan 2027 sets out an indicative Housing Land Requirement (HLR) based on the outcomes of the 2023 HNDA. The HLR is based on the HNDA ‘growth scenario’, with the number of housing units to be delivered over the next 10 years (approximately 4,500). On this basis, an annual target of 440 housing completions and 500 effective housing land supply have been set.

Scottish Planning Policy and the Local Development Plan requires Moray Council to maintain a ‘5-year effective’ supply of housing land. This means having a sufficient supply of sites which are free from significant constraints and capable of development in the next 5 years. The 2024 Housing Land Audit reveals that there is an effective land supply of 5,303 units across Moray in the next 5 years. Current, effective land supply therefore offers generous capacity, over and above the Housing Land Requirement to meet targeted housing delivery levels.



To meet future targets, enabling house building at historically peak delivery rates will be essential. Housing completions in Moray over the last 5 years shows that average annual housing delivery has been 384 units, peaking in 2023/24 at 459.

## 5.2 LHS Priority 1: What do Residents, Partners and Stakeholders Think?

Informed by resident feedback and housing system analysis, partners and stakeholders came together to define the major barriers that should be overcome in the Moray LHS to enable the delivery of more homes which support economic growth and enables sustainable



communities. Key local challenges which drive the need for future partnership, investment and delivery activity include the following:

<p><b>Stakeholder and partner consultation outcomes</b></p>	<p><b>Key issue:</b> New NPF4 developer obligations and requirements are squeezing commercial margins for developers, especially with rising construction costs. Developers now favour larger sites, making small rural builds in Moray harder to deliver.</p>	<p><b>Key issue:</b> Limited local construction capacity is a barrier to small-scale development. Volume builders focus on larger town sites, with little interest in rural areas. More collaboration is needed to boost viability and scale</p>	<p><b>Key issue:</b> Land supply is a barrier, with a few landowners controlling when sites are released. Despite large allocations, legacy sites often remain unused.</p>
<p><b>Key issue:</b> Whilst better coordination between landowners, developers, and infrastructure providers is needed, grants are also required to offset high infrastructure costs, especially in rural areas.</p>	<p><b>Key issue:</b> A diverse mix of housing tenures, including 'tenure neutral' developments, is key to reducing development risk and building sustainable communities. More focus is needed on Mid-Market Rent, with SSEN's legacy programme offering potential for mixed-tenure projects.</p>	<p><b>Key issue:</b> While affordable housing is a priority, rising costs limit social landlords' ability to lead on new builds. Many rely on Section 75 contributions which often focus development in urban centres where private developers have higher margins.</p>	<p><b>Key issue:</b> Stakeholders acknowledged the need for the new LHS to ensure that investment in placemaking supports the creation of sustainable communities. The importance of place in growing the population, particularly in rural areas should not be overlooked</p>

### 5.3 LHS Priority 1: Our Actions

Partners and stakeholders co-produced a range of options and ideas to proactively address the challenges associated with building more homes in Moray. Each priority is supported by a set of actions that will enable the Council and its partners to deliver LHS Priority 1 Outcomes over the next 5 years. [View the LHS Action Plan here.](#)



## 5.4 Setting Housing Supply Targets

Moray Council completed a Housing Need and Demand Assessment (HNDA) which was signed off as robust and credible by the Centre for Housing Market Analysis in December 2023. The HNDA provides a statistical estimate of how much additional housing will be required to meet all future housing need and demand in the region. The housing estimates produced by the HNDA provide the starting point for setting a Housing Supply Target (HST) within the Local Housing Strategy.

The HST has been derived from HNDA housing estimates and takes into consideration the full range of factors that may influence housing delivery on the ground including historic completions, available resources and policy considerations. The HST therefore provides a strong starting point for determining the Housing Land Requirement within the new Moray Local Development Plan.

Analysis of the practical and policy factors that may impact on the scale and pace of housing delivery across Moray, acknowledges a positive delivery context for both market and affordable housing including a generous supply of effective and established land resources, positive housebuilder appetite and infrastructure investment to improve site effectiveness and delivery. This analysis has shaped the tenure delivery balance of the Housing Supply targets set.

The Housing Supply Target (HST) sets out the estimated level of additional housing that can be delivered on the ground and informs the definition of the Local Housing Land Requirement within the new Local Development Plan (LDP). An annual Housing Supply Target (HST) for Moray has been set at 520 units per annum with a 36% target for affordable housing (190 units) and a 64% target for market housing units (330 units).

An evidence paper setting out the approach to setting Housing Supply Targets in Moray is available in Appendix B.

## 6 LHS Priority 2: Making better use of existing homes prevents homelessness and improves housing options and choice

The Local Housing Strategy (LHS) provides the overarching framework to mitigate the impact of housing affordability pressures on the ability of local households to access suitable housing options. It sets out housing's role in improving housing choice across all housing tenures and the LHS contribution to tackling housing-induced poverty and child poverty.

The LHS also provides the framework for the delivery of the Council's Rapid Rehousing Transition Plan (RRTP), building on national principles which seek to transform the delivery of homelessness services across Scotland.

Tackling and preventing homelessness is an ongoing housing priority both nationally and in Moray. Ensuring local households have good awareness of housing options and are empowered to find the right home to meet their needs is at the centre of a proactive and preventative model of improving housing access. In Moray this also means finding opportunities to extend the range of housing options and choices available where they may be limited, by maximising the effectiveness of the existing housing stock.

Equally, enabling households to keep their current home through the provision of person-centred housing support services is at the heart of LHS ambitions around improving housing sustainment and independent living.

Furthermore, the LHS is required to provide evidence and policy direction in relation to:

- improving the range of housing tenures and the accessibility of housing options
- supporting the operation of the private rented sector
- delivering proactive housing information, advice and assistance within a preventative housing options framework
- providing support services, which meet housing and underlying needs to enable housing sustainment
- improving housing affordability and enhancing housing's role in tackling child poverty.

Informed by analysis of the main issues and housing system drivers, LHS Priority 2 focuses on **'making better use of existing homes to prevent homelessness and improve housing options and choices'** by:



Chapter 6 sets out the evidence base and outlines what Moray Council and partners are doing to address the main challenges in improving existing housing options, choice and affordability. It concludes with LHS priority actions for partnership, investment and delivery activity.

## 6.1 LHS Priority 2: What's our Starting Point?

A detailed briefing which sets out the housing system evidence underpinning LHS Priority 2 can be accessed here: [LHS Priority 2 Interactive Briefing](#)

LHS analysis suggests that the key issues which drive the need for action, investment and partnership to improve the range of quality, accessible, affordable and sustainable housing options in Moray is as follows:



The housing system in Moray is dominated by owner occupation with a greater proportion of homes in this tenure (67%) than is the case nationally (63%). In contrast, the social housing sector accommodates 19% of local households, lower than the Scottish average at 22%.

The scale of home ownership in Moray potentially limits the range of housing options available to meet housing need. Furthermore, it could be the case that a more limited range of affordable housing options in the Moray area is driving housing affordability pressures at a local level, with clear evidence of demand pressure on affordable housing.

Across dwellings in Moray, there is a high occupancy rate (93%) with the vast majority of residential properties being used as principle homes which meet housing need. Occupancy levels range from 97% in Elgin to 75% in Cairngorms, where there are high levels of empty, second and holiday homes.

The 2023 Housing Need & Demand Assessment estimates that over 6,000 new homes will be needed in the next 20 years across Moray. Based on the application of the affordability calculation, the HNDA identified the need for a more diverse range of housing tenure options. This includes more homes for rent including the PRS and intermediate housing tenures such as shared ownership, shared equity and mid-market rent.



There are approximately 9,000 units of affordable housing across the Moray area, 8% of which (699 units) become available for letting each year.

As of November 2024, 3,499 households are currently registered on Moray social housing waiting lists, equating to approximately 5 applicants for every property that becomes available.

Demand is particularly high for 1-bedroom and 4+ bedroom homes, with up to 8 applicants for every available tenancy. The highest demand on the waiting list is for the Elgin HMA at 57% of applicants, followed by Forres with 16%. The lowest demand is in the Cairngorms NP HMA representing 1% of the waiting list.

Published data sources suggest that 1% of households are both concealed and overcrowded (CHMA) as well as 2% of households overcrowded (Scottish House Condition Survey 2017-19). According to the Moray 2023 HNDA survey, the numbers are notably higher with 4% of households sharing amenities with another household, and more than 8% overcrowded and living with fewer bedrooms than they need. Whilst these statistics for concealed households and overcrowding are higher than published secondary data sources, respondents from the survey who are both overcrowded and sharing amenities with other households (1%) validate exactly to national statistics.

Up to 25% of households applying for social housing in Moray are assessed as having no need under the housing allocations policy. Of those with points, 19% of households are under-occupying their homes, 18% are overcrowded and 17% are sharing amenities. This suggests that an improvement in matching households to homes by property size could make a significant difference to meeting housing need within the social housing sector in Moray.



In 2023/24, 582 households made applications for assistance under the homeless legislation in Moray, which equates to a 14% increase in the last two years. On average, over the past 5 years, 528 households made homeless applications in Moray.

The majority of homeless applicants are aged between 25-69 (68%), with 21% aged between 18-25. In 2023/24, 13% of applicants reported sleeping rough in the 3 months prior to their application, a 50% increase from the previous year and higher than the rate for Scotland (7%).

On average, 15% of homeless applications in Moray come from applicants living outwith the area. Over the last 3 years, on average 48% of applications from within the local area came from Elgin, followed by Forres (15%) and Buckie (10%). The highest incidence of homelessness is found in Elgin with 1.3% of local households making an application. This compares to 1.2% of households across Moray and just 0.5% of households in Cairngorms National Park. Reasons for homelessness, assessment outcomes and housing outcomes can vary significantly across the different Housing Market Areas in Moray.

Based on the average over the past three years, the most common reason for homelessness was being 'asked to leave' current accommodation, affecting a third of applicants. Beyond the main reason, 13% experienced a violent dispute within their household followed by 9% facing non-violent disputes.



Top 3 Reasons for Homelessness  
(Annual average 2021/22-2023/24)

1. **Asked to leave (33%)** ranges from 21% of those seeking to leave Moray region – 39% in Buckie
2. **Dispute with household (violent/abusive)(13%)** ranges from 11% in Elgin to 18% in Speyside
3. **Dispute with household (non-violent) (9%)** ranges from 5% of those seeking to leave Moray – 19% in Keith

In Moray, 56% of all homeless applicants are assessed as unintentionally homeless and in priority need. This is notably lower than the proportion of unintentionally homeless applicants in Scotland (78%). A further 12% of applicants were assessed to be potentially homeless with 9% resolving their homelessness prior to an assessment decision and 8% either losing contact or (2%) withdrawing their applications.

86% of homeless households secured settled housing as an outcome of their application. This is higher than is the case for Scotland at 83%. This included 60% of homeless applications accessing social housing either via a local authority tenancy (45%) or RSL tenancy (15%). Almost 1 in 5 homeless applicants (19%) returned to their previous accommodation.



**Top 3 Housing Outcomes**  
(Annual average 2021/22-2023/24)

1. **LA tenancy (45%)** ranges from 38% in Keith - 47% in Elgin and Forres
2. **Returned to previous accommodation (19%)** from 13% in Speyside - 24% in Keith
3. **RSL tenancy (15%)** ranges from 12% of those seeking to leave area - 20% in Forres

The average time to discharge the homeless duty from application to outcome in 2023/24 was 20 weeks, which is notably lower than the Scottish average at 40 weeks. This reflects improvements in the length of time taken to resolve homelessness in Moray from 26 weeks in 2020/21 to 20 weeks in 2023/24, a 23% reduction.



In 2023/24, 895 households approached the housing options service in Moray for assistance, 3% lower than the previous year. In contrast, Scottish housing options approaches have gone up by 5%. Overall annual approaches for homelessness prevention advice in Moray have reduced over the last 3 years, however, households going on to make homeless applications have increased by 17% between 2021/22 to 2023/24.

This could be driven by 94% rate of prevention activity focused on advice and information to the client rather than the more tangible actions. Scotland overall had a far lower percentage of advice and information actions (73%), with a greater focus on tangible actions such as repairs and negotiations with landlord (12%).

Currently, there are approximately 122 units of temporary accommodation across Moray. In 2023/24, the average length of stay in temporary accommodation was 17 weeks. This is substantially lower than the Scottish average (32 weeks).

The Council has continued to reconfigure its supply of temporary accommodation since 2010/11. It has reduced or stopped using a number of expensive units (i.e. private sector leasing, RSL accommodation, Service Family Accommodation etc.). This was to lessen the costs both for homeless households and the Council. The fit between supply of, and demand for, temporary accommodation is subject to continuous monitoring, re-assessment and reconfiguration. This flexible approach allows the Council to minimise the cost of temporary accommodation and ensure stock is provided in required locations as well as creating efficiencies which has reduced the number of temporary accommodation units and the amount of time homeless applicants spend in temporary accommodation.

**RRTP objective outcomes:**



reduction in temporary accommodation units



Decrease in average time spent in Temporary accommodation since 20/21



Bed and Breakfast accommodation is no longer used and would only be considered in a dire emergency situation.

Prevention is the cornerstone of the Rapid-Rehousing model in Moray. The review of Homelessness Services in 2022 led to the redesign of the service framework to prioritise homelessness prevention as a first priority. The plan provides a framework of activity founded on the principle of partnership across public sector agencies to prevent homelessness whenever possible.

Rapid rehousing plan priorities are set across the following 5 themes:

- **Health and homelessness:** pushing for improving awareness and upskilling staff
- **Housing Support:** ensuring this is provided at varying levels to those who need it most

- **Poverty:** pushing for improvements in awareness and upskilling staff
- **Housing Options:** aiming to review policies and procedures by consulting with key partners
- **Housing First:** pushing partnership working with Registered Social Landlords to ensure accommodation provision.

### Housing Support and Sustainment



Housing support is a vital component in preventing homelessness and ensuring that households are able to move into permanent suitable accommodation as quick as possible. When a need is identified, support staff can work with the tenant to either address the issue or ensure any situation is contained and does not deteriorate to an extent where the household's tenancy is at risk.

There were 351 housing support cases in Moray in 2023/24, with each client receiving on average 1 hour of support per week.

Almost 50% of households with housing support needs lack independent living skills which could impact on the sustainment on their tenancy. Despite this high figure, tenancy sustainment levels for homeless households moving to permanent accommodation and sustaining for more than 12 months, has increased from 89.8% to 93.5% in the last 5 years.

Almost ½ of cases lack independent living skills

Support initiatives from the RRTP in place to aid sustainment include:

- Partnership with Moray Integration Joint Board – enabling fast track specialist support which is not always available within the housing service
- Moray Fresh Start – offering starter packs for homeless households enabling them to move into their own accommodation quicker
- Moray Food Plus – providing food parcels direct to homeless hostels

The rapid rehousing model therefore places the delivery of person centred and proactive housing support services at the heart of the Moray strategy to achieve housing sustainment and homelessness prevention.

### Tackling Housing Induced Poverty



Analysis of housing affordability in Moray reveals that there are clear affordability pressures locally, particularly for those on low household incomes. A significant proportion of households in Moray (32%) earn less than £25,000 per annum. Furthermore, the average income in Moray (£45,307) is 7% lower than the Scottish average.

Between 2014 and 2022, Moray saw an increase in children living in poverty, up by 3.2% to 24.1%. This is above the Scottish national increase of 2.9%.

Across multiple Moray Council plans and strategies there is a cohesion and a holistic approach surrounding the issue of poverty. The interlinked nature of a low wage economy and demographic/geographic imbalances such as the gender pay gap, ageing populations, suitable roles and rural deprivation is recognised and largely focused on as the route to improving household poverty. The role of housing is to contribute to the achievement of these priorities by prioritising delivery of energy efficient, affordable housing of a size and type suitable for all households.

Strategy	Priorities
<b>Local Outcome Improvement Plan V2 (2016-26)</b>	<ul style="list-style-type: none"> <li>Inequalities in educational attainment will reduce.</li> <li>Access to employment opportunities will improve and low pay will reduce</li> <li>Health and social inequalities will reduce.</li> </ul>
<b>Corporate Plan (2024-29)</b>	<ul style="list-style-type: none"> <li>Tackle Poverty and Inequality</li> <li>Build Stronger, Greener, Vibrant Economy</li> <li>Build thriving, resilient, empowered communities</li> </ul>

Across multiple Moray Council plans there is cohesion and a holistic approach surrounding the issue of poverty. The interlinked nature of a low wage economy and demographic/geographic imbalances such as gender pay gap, aging populations, suitable roles and rural deprivation is recognised and largely focused on as the route to improving household poverty.



Ineffective housing stock is a term used to describe housing which is not used as a principal home in Moray either because it is empty or used for a different purpose. 5% of dwellings in Moray are ineffective (2,405), slightly above the rate for Scotland at 4.1%.

Whilst ineffective stock in Moray is close to the rate in Scotland, it is not proportionately balanced throughout the area. Whilst the Cairngorms HMA has a particularly acute issue with almost a quarter of its housing stock not currently being used as a principal home (26%), this comprises a relatively small number of properties in overall terms (140). In contrast, whilst just 3% of the housing stock in Elgin is ineffective, this accounts for 727 homes.

In December 2023, the Scottish Government introduced new legislation to allow all local authorities in Scotland to increase the charge levied on Second Homes by an additional 100%. In January 2024, elected members of Moray Council agreed to introduce a double levy on all second homes from April 2024. The introduction of this levy provides the Council with more resources to make the best use of housing stock in the area and to influence the operation of the local housing system.

A recent audit by Moray Council has mapped the extent and nature of second homes and short term lets across each Housing Market Area, to identify if hotspots exist and assess the need for targeted policy interventions to support local communities to meet housing need. Ineffective stock in the Cairngorms HMA is driven by notable levels of second homes (61) and short-term lets (53), reflecting its status as a tourism destination offering a high quality natural environment.

Whilst further hotspots of second homes and short-term lets can be identified in the Cullen, Findhorn and South Speyside settlements; these areas form an important part of the Moray tourism sector. Whilst a careful balance should be struck between housing system operation and managing ineffective stock, analysis suggests that clusters of second homes and short term lets are confined to a small number of areas which operate as important parts of the Moray tourism economy.



Homes become empty for a number of reasons but in Moray, most only remain empty for a short period of time whilst awaiting relet, or sale, or repairs/ improvements. These are known as transitional vacancies. However there are also homes which remain vacant for longer.

The reasons for this are diverse but can be:

- The property is used as a second home, or holiday let
- The property is undergoing major renovation
- The property has been marketed for sale and but remains unsold
- The property is in very poor physical condition and not fit for occupation
- The owner is in hospital or has moved into a long term care setting
- The owner is deceased

Long term vacancies can cause several problems, both for the owner and the wider community. Empty homes can attract criminal activity and anti-social behaviour. If empty homes are neglected, they can cause physical damage to adjacent properties, can reduce the marketability of properties in the vicinity, and can deter investors and hamper economic development.

Bringing long-term empty homes back into use provides key opportunities to enhance housing options in Moray. Investing in long-term empty properties not only increases the supply of local housing but improves the condition of housing stock and helps to regenerate communities.

The Council Tax Register is the most comprehensive source of available data on empty homes. The Register as at 17 July 2018 has been analysed to quantify Moray’s empty homes and to inform the Council’s approach to bringing empty homes back into occupation. At that time there were 2,612 Council Tax accounts in receipt of a discount, or exemption, or liable for the Council Tax Levy.

As of July 2025, there were 997 empty homes across Moray including 767 long term empty properties and 230 unoccupied exemptions. The proportion of empty homes varies by housing market area, ranging from 5% of all homes in the Cairngorms HMA (26 properties) to 2% in Elgin (350), Buckie (176), and Forres (175).

Empty properties	Buckie	Cairngorms NP	Elgin	Forres	Keith	Speyside	Total
Total Dwellings	7817	545	22652	8651	3821	3644	47130
Long-Term Empty	128	24	261	121	103	130	767
Empty	48	2	89	54	16	21	230
Total Empty	176	26	350	175	119	151	997
% of total properties	2%	5%	2%	2%	3%	4%	2%

In July 2018, there were 2,612 empty properties. HNDA 2017 reported 2,212 as at 1 April 2017. Although numbers fluctuate, these represent approximately 4-5% of Moray’s total housing stock.

Mapping analysis concludes that there are no specific concentrations of empty homes across Moray, and whilst there are some pockets in more rural areas, these tend to be small in terms of numbers, and in areas of low housing demand.

In 2025, Moray Council and Aberdeenshire Council established a shared approach to empty homes interventions, with the support of the Scottish Empty Homes Partnership, which is

facilitated by Shelter Scotland. SHEP will fund an Empty Homes Officer for a shared project hosted by Aberdeenshire Council, which builds on their well established approach. The project is governed by an Empty Homes Board which has representation from both Councils.

In line with the **Scottish Empty Homes Partnership (SEHP) Strategic Framework**, our approach is structured around eight key steps that guide the development and delivery of a robust approach:

1. **Policy and Legislative Context**  
We align our activity with national policy objectives, including the Scottish Government's commitment to increasing affordable housing supply and reducing housing inequality. Empty homes work is embedded within our Local Housing Strategy and contributes to wider community planning outcomes.
2. **Data and Evidence Gathering**  
Using Council Tax records, Housing Need and Demand Assessment (HNDA), and local intelligence, we identify concentrations of long-term empty homes, prioritising those within LDP Settlement boundaries where housing pressure is most acute.
3. **Strategic Prioritisation**  
We focus resources on properties that have been vacant for over 12 months and are located in areas with demonstrable housing need. This includes urban centres, regeneration zones, and rural settlements where housing options are limited.
4. **Engagement and Partnership Working**  
We work collaboratively with owners, housing associations, developers, and community groups to explore options for reuse. This includes offering advice, support, and access to financial assistance where appropriate.
5. **Intervention and Incentives**  
The Council utilises a range of tools including:
  - o Buy-back schemes for social housing
  - o Enforcement powers where necessary (e.g. Compulsory Purchase Orders)
6. **Action Planning and Delivery**  
Each identified property is assessed for its potential to be brought back into use. Tailored action plans are developed, setting out the steps required, timescales, and responsible parties.
7. **Monitoring and Evaluation**  
We track progress through key performance indicators such as the number of homes returned to use, reduction in long-term empty properties, and impact on local housing supply.
8. **Community Impact and Sustainability**  
Bringing empty homes back into use supports town centre regeneration, improves neighbourhood safety, and contributes to environmental goals through retrofit and reuse. It also helps reduce reliance on new build development, preserving greenfield land and supporting net-zero ambitions.

By adopting a strategic and targeted approach, the Council aims to unlock the potential of long-term empty homes as part of a wider housing solution. However, Aberdeenshire Council's Local Housing Strategy states that "engaging with empty homeowners can also be challenging. Targeted emails are sent to empty homeowners biannually, in line with General Data Protection Regulations (GDPR), to make them aware of the Empty Homes Service and the advice and support that can be provided to assist owners to bring their empty property back into use. However, the response rate is low, with some requesting that the team do not contact them again. In addition to this, the housing service work closely with Council Tax to ensure details of the empty homes service is included in correspondence. This allows homeowners with no email addresses to be made aware of the advice and assistance available."

The Empty Homes Framework developed by the Scottish Empty Homes Partnership (SEHP) is embedded in our commitment to bring empty homes back into use, via our collaboration with Aberdeenshire Council. We will encourage and support empty homeowners to do so using the resources and initiatives available via the dedicated Empty Homes Service to provide individualised advice:

Further information on Moray Council’s approach to empty homes is set out on the Council’s website at [www.moray.gov.uk/emptyhomes](http://www.moray.gov.uk/emptyhomes).

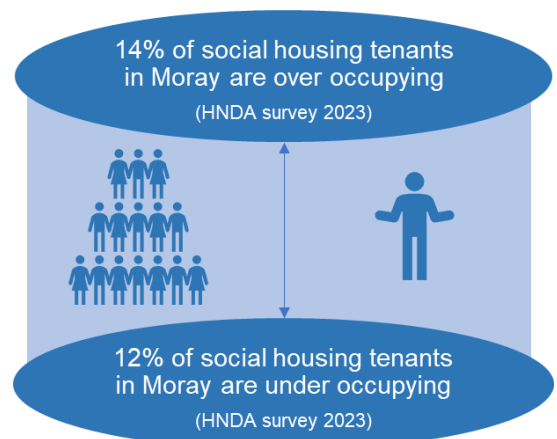


The 2023 HNDA survey shows that there are almost equal levels of overcrowding and under occupation in social housing in Moray.

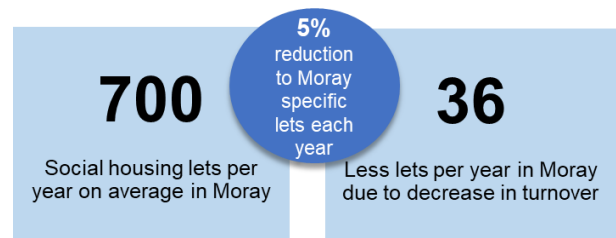
Housing market area analysis of stock imbalances, shows that in the Elgin and Keith HMAs there is exactly the same percentage of households requiring 1 extra bedroom as the number requiring 1 bedroom fewer. There is significant potential for existing social housing stock to be utilised more effectively to meet the needs of current tenants without having to build more homes. To better

match households to homes in the social housing sector, Moray Council is exploring strategies to make more effective use of its housing stock including:

- financial incentives to downsize
- priority access to smaller properties
- moving assistance and support
- social and emotional support
- property refurbishment and customisation
- campaigns for mutual exchange.



The current incentive scheme offers payments of up to £2,300 for eligible tenants in 3-bedroom homes to move, but it is limited to 25 households per year and has a strict eligibility criteria. Further reviewing of this incentive to offer more flexibility and increasing the budget could help maximise the effectiveness of the existing stock held by Moray Council.



Aligned to wider national trends since the pandemic, the turnover of social housing in Moray has declined by around 5% over the past two years, dropping by an average of 36 lets per year.

To address this, there is a need to make better use of existing stock by improving allocation policies and the proportion of lets made to transfer applicants, expanding eligibility for downsizing schemes, increasing the use of private and shared housing options, and bringing empty homes back into use.

Regular analysis of local demand and smarter matching of homes to both existing tenants and new applicants are positive mechanisms to increase social housing availability without relying solely on the delivery of new social housing.



## 6.2 LHS Priority 2: What do Residents, Partners and Stakeholders Think?

Informed by resident feedback and housing system analysis, partners and stakeholders came together to define the major barriers that need to be overcome in the new Moray LHS to maximise the use of existing stock, prevent homelessness and improve housing choice. Key local challenges which drive the need for future partnership, investment and delivery activity include:

<p><b>Stakeholder and partner consultation outcomes</b></p>	<p><b>Key issue:</b> Homelessness responses in Moray are improving, with fewer presentations and quicker resolutions. However, relationship and family conflict remain key drivers, and a rise in youth homelessness is an emerging concern.</p>	<p><b>Key issue:</b> Stakeholders noted that commissioned services had played a significant role in supporting and helping vulnerable households to maintain their housing status, but that these had been severely impacted by reductions in funding.</p>	<p><b>Key issue:</b> Stigma around social housing and homelessness services may contribute to hidden homelessness, as some avoid seeking help. It can also hinder placing people in areas suited to sustaining tenancies, though most communities are supportive of integration.</p>
<p><b>Key issue:</b> High owner-occupation in Moray is clogging both social and private rented sectors, driving up demand and reducing supply. Poor property conditions, unclear private rental practices, and elderly owners struggling with upkeep add to pressures.</p>	<p><b>Key issue:</b> Empty homes are seen as less of an issue in Moray overall, though some exist across housing areas. Second homes and short-term lets create pressures in specific areas like the Cairngorms and Cullen, with stakeholders supporting better management while protecting tourism.</p>	<p><b>Key issue:</b> Stakeholders noted Moray's complex housing market, with rural-urban differences, dominant owner-occupation, shifting homelessness trends and a PRS that is not fully understood. Growth Deal impacts on key worker housing needs add to the complexity, highlighting the need for further research.</p>	<p><b>Key issue:</b> Current partnership working within the social housing sector in Moray was seen as a strength, but stakeholders felt that this should be developed further to be more strategic and widened to include more input support agencies.</p>

## 6.3 LHS Priority 2: Our Actions:

Partners and stakeholders co-produced a range of options and ideas to proactively address the challenges associated with building more homes in Moray. Each priority is supported by a set of actions that will enable the Council and its partners to deliver LHS Priority 2 Outcomes over the next 5 years. [View the LHS Action Plan here.](#)

## 7 LHS Priority 3: Partnership working maximises housing's role in improving health and wellbeing

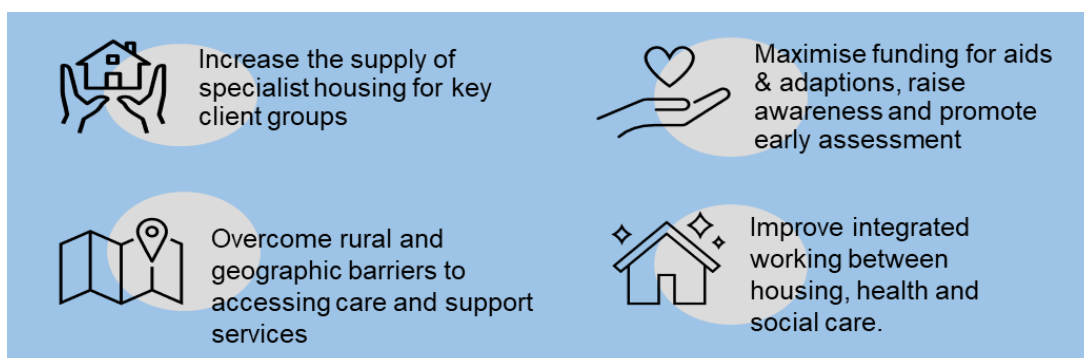
Through the delivery of the Housing Contribution Statement (HCS), the LHS has a key role to play in meeting national health and wellbeing outcomes in Moray. The HCS sets out housing's contribution to achieving Moray's Health and Social Care Partnership's Strategic Plan to support more people to live at home or within a homely setting and to promote independent living.

The LHS plays a significant role in supporting people to live independently and well at home by setting the framework for delivering accessible homes, wheelchair homes and specialist forms of provision such as supported accommodation for key client groups. The LHS also sets the framework for enabling people to live independently and well for as long as possible through investment in new build properties, property adaptations, technology, care and support services.

Aligned to improving access to specialist housing and enabling independent living, the LHS is required to provide evidence and policy direction in relation to:

- targets for delivering wheelchair, accessible and specifically designed homes
- mechanisms to enable existing homes to be adapted to meet the changing needs of households via the Scheme of Assistance and the investment programmes of social landlords
- need for specialist housing provision across key client groups
- the delivery of preventative housing support services to promote independent living
- maximising the use of technology enabled care in homes across Moray.

Informed by analysis of the main issues and housing system drivers, LHS Priority 3 focuses on ensuring **partnership working maximises housing's role in improving health and wellbeing** by:



Chapter 7 sets out the evidence base and outlines what Moray Council and partners are doing to address the main challenges in maximising housing's roles in improving health and wellbeing. It concludes with LHS priority actions for partnership, investment and delivery activity.

### 7.1 LHS Priority 3: What's our Starting Point?

A detailed briefing which sets out the housing system evidence underpinning LHS Priority 3 can be accessed here: [LHS Priority 3 Interactive Briefing](#)

LHS analysis suggests that the key issues which drive the need for maximising housing's role in improving health and wellbeing in Moray are as follows:

#### Specialist housing needs profile



In Moray, over half of all households (52%) include at least one person with a long-term health condition or disability, a proportion that notably exceeds the Scottish national average of 44%. This prevalence is even higher within the social housing sector, where 66% of households report having someone with a health condition or disability. This highlights the important role that social housing plays in supporting vulnerable people in the area.

Data from the 2023 Moray Housing Need and Demand Assessment survey further illustrates the diversity and scale of health challenges faced by residents. The survey found that 18% of households reported a long-term illness, 17% had a physical disability, and 16% experienced mental health conditions, underscoring the broad range of needs within the community.

Among those respondents living with a health condition or disability, 22% reported that their current housing situation either did not meet their needs well or failed to meet them entirely. This finding points to significant gaps in the adequacy and accessibility of housing stock, with potential implications for the wellbeing and independence of these households. It highlights the urgent need for targeted housing adaptations, improved accessibility, and tailored support services to better align housing provision with the specific needs of people with health conditions and disabilities in Moray.

#### Specialist housing requirements



Social landlords across Moray manage 4,074 units of specialist housing, accounting for 45% of the total social housing stock. Of these, 81% are designated as amenity or ambulant disabled housing for individuals with mobility needs, while 16% offer supported accommodation, including sheltered housing. Only 3% of the specialist housing is fully wheelchair accessible.

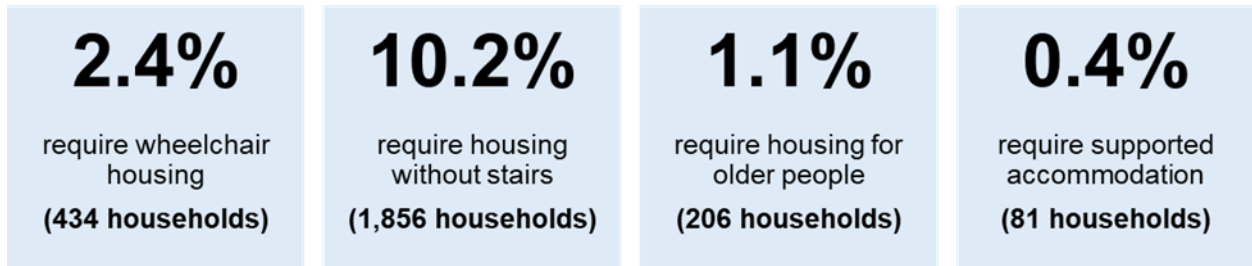
Over the past three years, an average of 8% of specialist housing stock became available for letting each year, resulting in 343 new tenancies, only nine of which were wheelchair accessible units. Data from the Moray Housing Register indicates that nearly 1 in 5 applicants (19%) are seeking specialist housing, including 36 applicants for wheelchair accessible homes and an additional 617 applicants in need of accessible, ground-floor accommodation.

Over and above expressed demand for social housing, the 2023 HNDA survey reveals that 16% of all Moray households with a health condition or disability, require specialist housing to meet their long-term housing need.

16%

of Moray households with a health condition or disability problem require specialist housing (2,577 households)

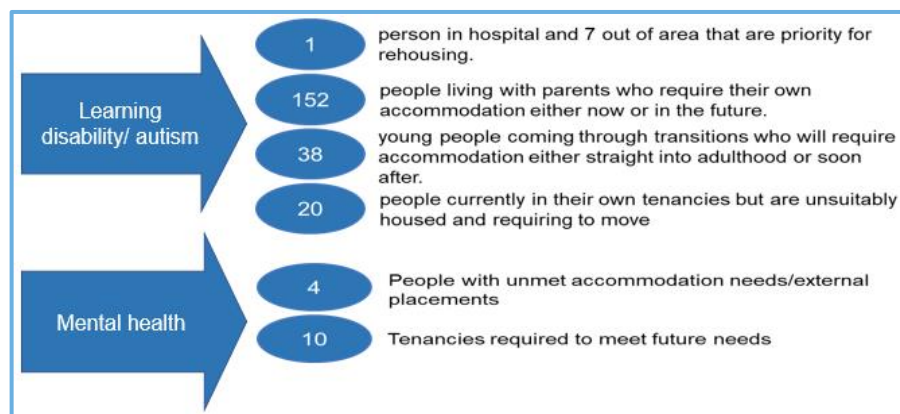
The largest number of households (1,856) require accessible housing without stairs, with 434 households requiring wheelchair housing.



The Moray Health & Social Care Partnership commission supported housing services for a range of client groups living in the Moray area, including:

- 682 care home or supported housing places
- 249 commissioned care packages for households with health conditions or disabilities
- 131 housing support packages for households with learning disabilities
- 53 support packages for households with mental health conditions.

In addition to this, a further 14 people with mental health conditions have been assessed as needing supported housing. These individuals require environments that not only provide a safe and stable place to live but also offer access to specialist mental health support services that can help them manage their conditions and prevent crises.



Combined, these figures represent a total of 225 people in Moray whose complex needs are not currently being met by the existing housing provision. The shortage of appropriate supported accommodation not only impacts the quality of life and wellbeing of these individuals but also places additional pressure on health and social care systems. Without the right support, many may face unnecessary hospital admissions, prolonged stays in unsuitable placements, or increased dependency on family carers who may themselves require support. Addressing this gap in provision is a strategic priority for integrated health and social care planning in Moray.

There is a lower rate of care home places in Moray (29 per 1,000 population aged 65+) than in Scotland (39 per 1,000). According to national statistics, 536 households in Moray were living in care homes in 2021, with average occupancy levels at 90%. The 'Home First' agenda is a key aspect of the Moray Integrated Joint Board Strategic Plan (2022-2032), which aims to support people to live at home or in a homely setting for as long as possible. Pursuing this model of community-based care and support provision, should result in a future reduction in the use of care home places across Moray.

Health and Social Care Moray have been implementing a "progression model" of provision of housing and associated support for people with learning disabilities. The Progression Model assumes that people with learning disabilities will not occupy the same housing throughout

their lives, but in common with other people, will move from setting to setting as their life skills and support needs change over time.

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.

Over the term of this LHS Health and Social Care Moray intend to consider the best model of provision of supported housing for people with mental health conditions.

In principle, Moray Council will award **high priority** in the SHIP for Scottish Government funding to developments which will deliver housing with on-site support, in partnership with Health and Social Care Moray.

#### Wheelchair housing target



Scottish Government Guidance published in 2019, set a requirement to define wheelchair accessible housing targets across tenure as part of the Local Housing Strategy framework. This target will guide delivery planning, including the development of the Strategic Housing Investment Programme for affordable housing, as well as local planning policy for market developers.

As part of the HNDA evidence base, a specific calculation has been assembled to provide estimates of the requirement for accessible housing in Moray over the next 5 years. The calculation works on the same basis as the HNDA toolkit and uses a combined measure of existing need and newly arising need to provide annual estimates. Existing need for accessible housing was derived by analysing local evidence unmet need as well as the outcomes of the 2022 HNDA survey. Newly arising need for accessible housing was derived by applying the Mind the Step methodology to demographic projections in Moray. Finally, the existing supply of accessible housing in both the affordable and market sectors was considered to derive net estimates of accessible homes.

Assuming that a 5-year projections period is utilised to meet the need for wheelchair accessible market housing (40 units), when benchmarked against average annual market supply in Moray (15); it shows a net shortfall of 25 wheelchair accessible units per annum. This analysis suggests that the current planning policy in place is not sufficient to meet the requirement for wheelchair accessible homes.

Assuming that a 5-year projections period is utilised to meet the need for wheelchair accessible affordable housing (72 units), when benchmarked against projected annual SHIP completions in Moray as well as the turnover of existing stock (7), an overall shortfall of 65 units per annum is evident. Wheelchair accessible housing estimates therefore suggest a need for 90 homes each year for the next 5 years.

**Based on average annual all tenure completion rates, (c. 370 units), an all tenure target of 10% wheelchair accessible housing has been set for the life of the LHS. This level of delivery is considered to be feasible and will reduce backlog need for wheelchair housing by 40% over the next 5 years.**

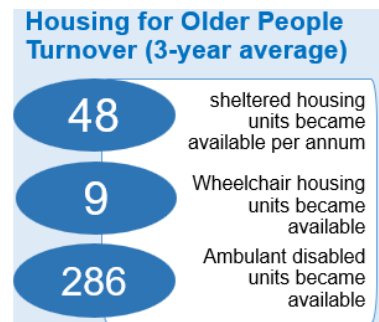
Housing for older people



National household projections show that the population in Moray is ageing at a much higher rate than is the case in Scotland. By 2043, it is projected that the 65-84 age group will increase by almost 24% with the 85+ group increasing by 85%. These increases are higher than the projected national rate of 22% and 64% respectively. A growing population of older people in Moray will necessitate housing, care and support interventions that enable households to live independently and well in their homes and communities, the central principle of the IJB's Home First agenda.

Partnership working between housing, health and social care professionals to plan, commission and deliver specialist housing and support services for older people will therefore be a key priority for the new Local Housing Strategy.

There are 591 units of social housing specifically designed for older people in Moray, which generate an average turnover of 48 sheltered housing properties per annum. The housing list in Moray has 62 applicants who require sheltered accommodation and the 2023 HNDA survey suggests that approximately 200 households in Moray have an unmet need for retirement or sheltered housing.



In response to the significantly ageing population in Moray, which is projected to surpass national trends, the Local Housing Strategy will prioritise the development and delivery of specialist housing and support services for older people.

A key outcome will be to address the current shortfall in suitable housing and to ensure that supply and turnover of existing stock, such as the 591 social housing units for older people, are managed effectively to meet growing demand.

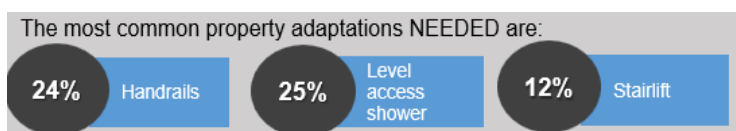
Aids and adaptations



The 2023 HNDA survey suggests that 46% of households with a health condition and/or disability in Moray currently live in properties which have been adapted to meet their needs. However, a further 48% (6,129 households) need adaptations to their property to improve day to day living.

Whilst there is clear evidence of unmet need and a requirement for further investment in aids and adaptations, in 2023/24, £717k was invested in property adaptations by Moray Council with a further £687k of investment to households in home ownership or the PRS via Private Sector Housing Grant. Since 2019/20, investment in aids and adaptations has increased by £300k, likely reflecting both increased demand for services and the increased costs in the construction sector post Covid-19.

In Moray, the most common property adaptations needed are level access showers, handrails, and stairlifts. These modifications are critical in supporting individuals with reduced mobility, ensuring safer navigation of the home environment and promoting independence. The high demand for level access showers reflects the necessity for accessible personal care facilities, particularly among older adults and individuals with physical impairments.



To address the high levels of need for level access showers, Moray Council, in collaboration with Occupational Therapists, have approved the installation of shower cubicles in smaller

ground floor properties in order to improve the accessibility of the Council's housing stock in parallel with mobility equipment. This preventative intervention will promote independence at home for longer as the needs of older and chronically ill households progress.

The Scottish Social Care Survey in 2017 revealed there was a population of just under 3,000 households engaging with social care services across the Moray area. The top 3 social care services which enable independent living in Moray include (i) social work support (39%); (ii) community alarm or telecare (25%) and (iii) self-directed support services (18%).

Technology Enabled Care (TEC), particularly through the use of Telecare systems, plays a vital role in supporting independent living across Moray. Currently, over 1,800 households benefit from these services, which include a range of devices such as personal alarms, fall detectors, bed leaving sensors, flood detectors, and property exit detectors.



Over 1,860 households across Moray are supported to live independently as a result of using assistive technology (Telecare)

- 74% of this population are 75+
- 74% do not rely on Homecare services to meet their needs

These technologies are designed to provide immediate alerts and responses in the event of an emergency, thereby enhancing safety and providing reassurance to both service users and their families.

The Rural Centre of Excellence for Digital Health and Care (RCE), funded through the Moray Growth Deal, aims to advance Scotland's digital health agenda and support economic recovery. It includes a Demonstration & Simulation Environment in Elgin and Living Labs for innovation collaboration across Moray. The active participation in this project offers substantial value to Moray Council housing, both in terms of day-to-day service delivery and longer-term strategic development. These benefits include the access to training, workshops, and learning resources developed through the RCE's skills strand. Opportunities to build digital literacy and confidence in emerging technologies relevant to housing as well as engaging in multi-agency working and broadening staff skill sets. It could also introduce new digital tools i.e. referral systems that could streamline processes like assessments and adaptations and the collaboration with health and care partners could enhance the team's understanding of vulnerable tenants' needs, especially around ageing, disability, and mental health.

Gypsy traveller community



Until authorised halting sites are established in Moray, the Council will continue to implement its *Protocol and Guidelines for the Response to Unauthorised Camping in Moray*. This protocol affirms that "Public Agencies in Moray recognise and respect the fact that Gypsies/Travellers may wish to maintain a travelling way of life, whether due to family tradition, economic necessity, or a personal preference for mobility. Camping is regarded as a legitimate expression of Gypsy/Traveller cultural identity. Agencies

acknowledge that there should be no discrimination against Gypsies/Travellers on the basis of their lifestyle or cultural background."

At present, Moray Council does not operate any Council-managed short-stay sites, and there is only minimal private provision available. In the absence of authorised sites, the Council has focused its efforts on managing unauthorised encampments. This work is supported by a part-time Gypsy/Traveller Liaison Officer, based within the Housing Service.



Unauthorised encampments typically occur in a limited number of frequently used locations, often situated on publicly owned land such as that held by Moray Council or Highlands and Islands Enterprise (HIE) and are commonly found in industrial areas.

Looking ahead, the Moray Local Development Plan provides a critical mechanism for addressing this long-standing shortfall. National planning policy requires local authorities to identify suitable land for Gypsy/Traveller sites within their development plans. The next Moray LDP should therefore include the allocation of land for both permanent and short-stay Gypsy/Traveller sites as part of a planned and inclusive approach to housing provision.

In addition, the development of such sites could be supported through the Strategic Housing Investment Plan (SHIP), which identifies priorities for affordable housing investment.

### 7.2 LHS Priority 3: What do Residents, Partners and Stakeholders Think?

Informed by resident feedback and housing system analysis, partners and stakeholders came together to define the major barriers that should be overcome in the Moray LHS to ensure partnership working maximises housing’s role in improving health and wellbeing. Key local challenges which drive the need for future partnership, investment and delivery activity include:

<p><b>Stakeholder and partner consultation outcomes</b></p>	<p><b>Key issue:</b> A shortage of accessible and specialist housing is a major issue however Moray’s rural geography poses challenges for support and connectivity. Isolation impacts health and wellbeing, with many struggling to reach services or town centres</p>	<p><b>Key issue:</b> Moray’s rural geography poses challenges for support and connectivity. Isolation impacts health and wellbeing, with many struggling to reach services or town centres.</p>	<p><b>Key issue:</b> Falling affordable housing funding is limiting what can be built and to what standard. With less funding per unit, it’s hard to meet specific needs - fewer bungalows are built in favour of other house/flat types, which may not suit those with health conditions or disabilities.</p>
<p><b>Key issue:</b> Delayed home adaptations impact those in need or leaving hospital, often triggered too late in a crisis, highlighting the need for earlier, proactive planning.</p>	<p><b>Key issue:</b> Concerns were raised about low public awareness, recent guidance changes, and limited community involvement. Care is focused on high-need cases, leaving gaps for those with lower support needs—especially in rural Moray, where resourcing is limited.</p>	<p><b>Key issue:</b> A strong Housing Contribution Statement is needed to reflect housing’s role in improving health and wellbeing. It should align with outcomes from the Housing Need and Demand Assessment</p>	<p><b>Key issue:</b> Effective partnership working is limited by stretched resources and differing priorities. Data sharing is also a challenge, with fragmented systems and confidentiality barriers frustrating both staff and service users.</p>

### 7.3 LHS Priority 3: Our Actions:

Partners and stakeholders co-produced a range of options and ideas to proactively address the challenges associated with building more homes in Moray. Each priority is supported by a set of actions that will enable the Council and its partners to deliver LHS Priority 3 Outcomes over the next 5 years. [View the LHS Action Plan here.](#)

## 8 LHS Priority 4: Improving property condition and achieving affordable warmth is enabled in all homes

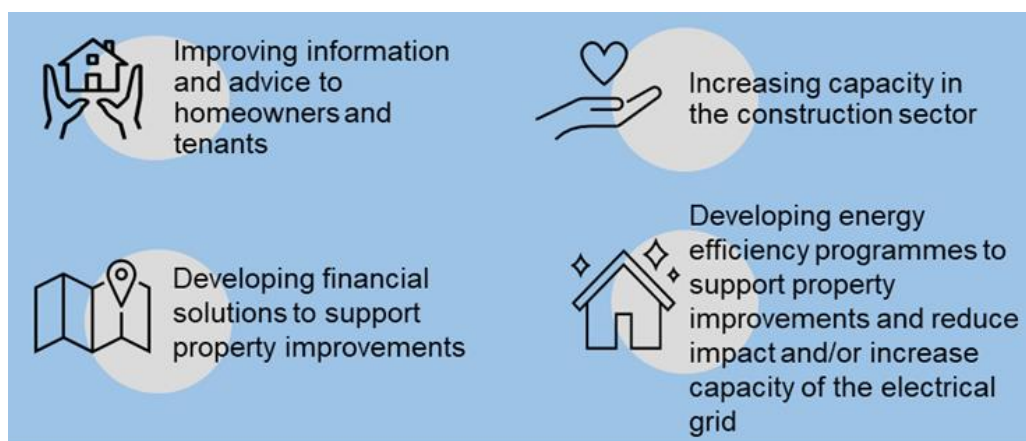
The Local Housing Strategy (LHS) provides the strategic framework for improving the quality and energy efficiency of homes across Moray, driving improvement in housing induced poverty and proactively tackling fuel poverty.

The LHS has a significant role to play in enabling the Moray area to meet the ambitious energy efficiency, climate change and housing quality targets set by the Scottish Government. It sets out how affordable warmth can be delivered through investment in housing condition and energy improvements, and details key partnership approaches for reducing domestic carbon emissions. The LHS also details the framework for improving the condition and quality of housing across all tenures, setting out the mechanisms and support to encourage private landlords and homeowners across Moray to invest in repair and maintenance.

Aligned to improving housing condition, energy efficiency and reducing carbon emissions, the LHS is required to provide evidence and policy direction in relation to:

- the strategy for delivering energy efficiency standards including the Energy Efficiency Standard for Social Housing (EESH2), targets for private sector homes set in the Heat and Buildings Strategy and future approach to delivering the proposed Scottish Social Housing Net Zero Standard
- delivering affordable warmth and driving housing's contribution to climate change
- improving the condition of all homes by meeting housing quality and repairing standards
- supporting private owners and landlords to invest in housing repair and maintenance through the Scheme of Assistance

Informed by analysis of the main issues and housing system drivers, LHS Priority 4 focuses on ensuring **'Improving property condition and achieving affordable warmth is enabled in all homes'** in Moray by:



### 8.1 LHS Priority 4: What's our Starting Point?

A detailed briefing which sets out the housing system evidence underpinning LHS Priority 4 can be accessed here: [LHS Priority 4 Interactive Briefing](#)

LHS analysis suggests that the key issues which drive the need for action, investment and partnership to improve housing condition, energy efficiency, and reduce carbon emissions in Moray are as follows:

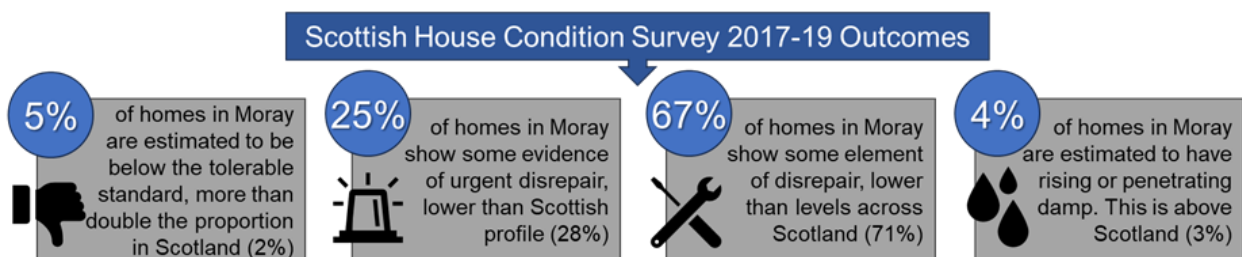
There are approximately 43,000 residential homes across Moray to meet the needs of the local population. Moray has a slightly newer housing stock compared to the national average, with only 28% of its homes constructed before 1945. This contrasts with the broader Scottish profile where 30% of residential properties are pre 1945.



The proportion of older properties in Moray shows significant variation across the different Housing Market Areas, highlighting significant contrasts in the age of the local housing stock. In the Cairngorms National Park, 45% of homes were built before 1919, reflecting the area's historical development patterns and the presence of long-established rural settlements. In contrast, Elgin has a comparatively lower proportion of older housing, with just 17% of properties dating back to the pre-1919 period. This likely reflects more recent urban expansion and a greater prevalence of modern housing developments within the town. These differences underline the diverse nature of Moray's housing stock and the varying challenges and opportunities for heritage conservation and housing renewal across the region.

Moray's housing stock is also predominantly composed of houses, which account for 87% of all homes across the region, this is substantially higher than the Scottish average of 64%. In contrast, flats represent just 13% of homes in the area, reflecting Moray's more rural settlement pattern and lower-density residential development.

Findings from the Scottish House Condition Survey (2017–2019) indicate that overall levels of disrepair in Moray (67%) are slightly below the Scottish average (71%). However, the proportion of properties classified as below tolerable standard (BTS) is significantly higher in Moray at 5%, compared to the national average of 2%. This presents a considerable challenge, particularly given that the majority of homes in the area are owner-occupied, with a further 12% in the private rented sector, these are both tenures where responsibility for repairs and improvements often falls directly on individual property owners or private landlords.



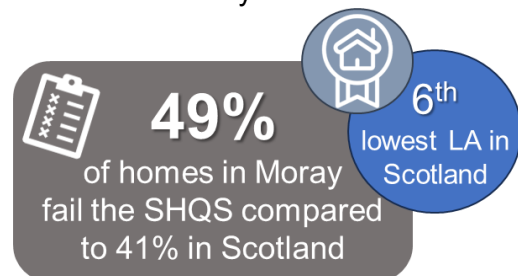
Findings also show that Moray has a higher proportion of dwellings affected by rising or penetrating damp, with 4% of homes impacted compared to the Scottish average of 3%. While the difference may appear small, it is significant in the context of housing quality and health. Damp conditions can contribute to a range of problems, including structural deterioration, poor energy efficiency, and negative health outcomes for residents, particularly those who are vulnerable. The higher incidence in Moray may reflect the age and condition of the housing stock in certain areas and suggests a need for focused maintenance efforts and potential support for homeowners and landlords, particularly in areas where housing is older or where resources for repair may be limited.

Similarly, household survey findings from the 2023 Housing Need and Demand Assessment revealed that 8% of all properties in Moray experience significant levels of dampness. However, the issue is more pronounced within certain tenures, it rises to 11% in the social rented sector and reaches a concerning 21% in the private rented sector. In addition, 13% of

all households reported issues with condensation, a common indicator of inadequate ventilation or insulation. This figure rises steeply to 40% in the private rented sector, suggesting widespread problems with energy efficiency and thermal comfort in this tenure. These findings again reiterate the pressing need for targeted investment in property condition improvements, particularly within the private rented sector, to ensure all homes meet acceptable standards of health and habitability.

Despite these challenges, the Scottish Government's Scheme of Assistance (SoA) statistics show that Moray Council's housing-related expenditure, totalling £687,000, has been largely focused on property adaptations to support independent living, with £485,000 allocated to disabled adaptations and £101,000 to administrative costs. This indicates that SoA activity and investment in Moray is primarily directed toward adapting homes for accessibility rather than addressing wider issues of disrepair and poor housing conditions in the private sector. Given the prevalence of dampness, condensation, and substandard conditions, particularly in the private rented sector, there is a clear case for rebalancing resources to support property condition improvement alongside essential adaptations

In terms of housing quality, Moray ranks as the 6th lowest local authority area in Scotland for compliance with the Scottish Housing Quality Standard (SHQS). According to the Scottish House Condition Survey, 49% of all homes across tenures in Moray fail to meet the SHQS, which is notably higher than the national average failure rate of 41%. This disparity is further reflected when considering the age of properties, for example, older homes, particularly those built before 1945, have a significantly higher failure rate, with 61% not meeting the standard. In contrast, 45% of homes constructed post-1945 fail the SHQS, highlighting the ongoing challenges posed by the maintenance and upgrading of Moray's older housing stock.



Fuel poverty in Scotland is defined by two key criteria: firstly, a household must spend more than 10% of its income on fuel costs; secondly, after accounting for these fuel expenses, the household's remaining income must be insufficient to maintain an adequate standard of living. This definition highlights both the financial burden of energy costs and the broader impact on household wellbeing.

Data from the Scottish Housing Condition Survey (2017–2019) reveals that fuel poverty affects 32% of households in Moray, a figure notably higher than the Scottish national average of 24%. This indicates that nearly one in three households in Moray struggle to afford adequate heating and energy, placing considerable strain on household budgets and potentially impacting health and comfort.



Extreme fuel poverty is defined more stringently as households spending more than 20% (1/5) of their income on fuel costs. In Moray, 19% of households fall into this category, again exceeding the national average of 12%. This elevated level of extreme fuel poverty suggests a significant proportion of residents face severe financial hardship related to energy expenses, which may be influenced by factors such as the age and energy efficiency of the housing stock, local income levels, and fuel prices.

Survey findings further identified specific dwelling characteristics and household types that are disproportionately affected by fuel poverty in Moray. Notably, 43% of households with older residents, those likely to be pensioners or retired, experience fuel poverty, which is

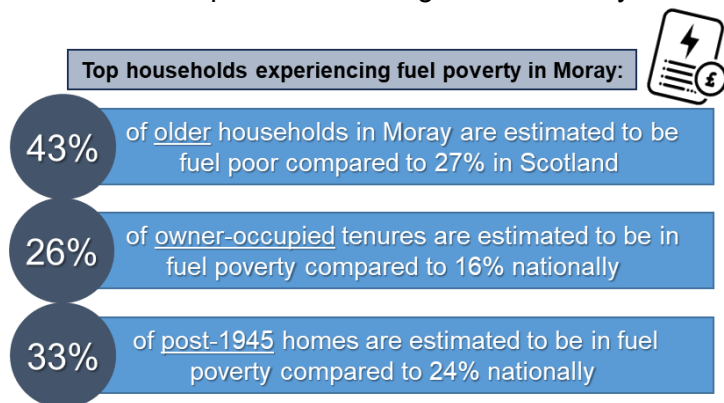
significantly higher than the Scottish average of 27%. This suggests that older populations in Moray face greater challenges in affording adequate heating, potentially due to fixed incomes and the health risks associated with cold homes.

In terms of tenure, 26% of owner-occupied households in Moray live in fuel poverty, compared to just 16% nationally. This elevated figure indicates that many homeowners in the area, who might typically be expected to have a more stable financial situation, still struggle with the cost of fuel, possibly reflecting the condition and energy efficiency of older privately-owned properties.

Additionally, 33% of homes built post-1945 in Moray are affected by fuel poverty, which is 9% higher than the national average of 24% for similarly aged properties. This points to ongoing issues with the energy performance of the post-war housing stock in Moray, which may lack adequate insulation or modern heating systems.

Overall, these findings highlight the varied and complex nature of fuel poverty across different household types and property characteristics in Moray, emphasising the need for targeted strategies to address the specific vulnerabilities of older residents, owner-occupiers, and those living in older homes.

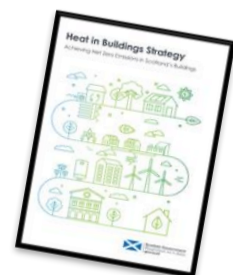
Consideration must also be given to the fact that more than half of the population reside in remote or rural settlements, alongside 30% of homes being off the gas grid and 23% having been built over 100 years ago.

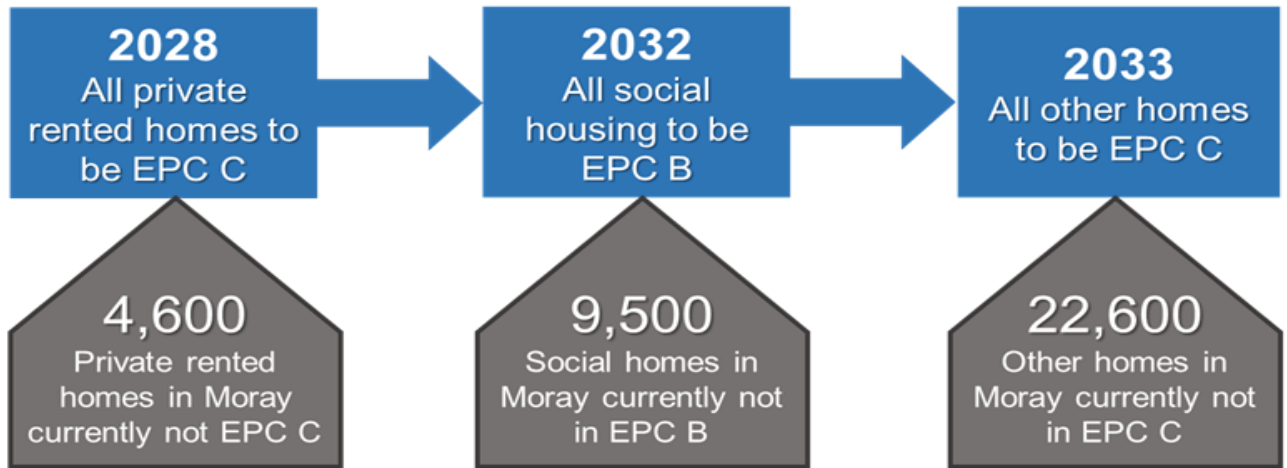


Changeworks has estimated that between 67% and 76% of all homes in Moray currently have an EPC rating of D or lower. This highlights a significant challenge for the region in meeting national energy efficiency and climate targets.

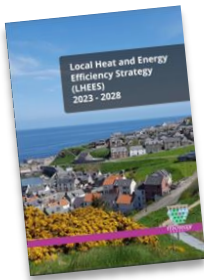
The Scottish Government has set ambitious goals for improving the energy efficiency of homes across the country. By 2033, the target is for all homes, regardless of tenure, to achieve at least an EPC rating of band C. For social housing, the targets are even more demanding: by 2032, these homes should meet a minimum standard of EPC band B. These standards are part of wider efforts to reduce carbon emissions, address fuel poverty, and improve housing quality.

The Scottish Government's Heat in Buildings Strategy was published on 7<sup>th</sup> October 2021. The plan outlines a pathway to net-zero emission homes and buildings in Scotland by 2045. In addition to the goal for all homes to reach EPC band C by 2033, the strategy also sets interim targets which includes all privately rented homes must achieve EPC band C by 2028, and all homes affected by fuel poverty should reach EPC band B by 2040.





This situation points to a significant gap between current performance and future expectations, underscoring the need for accelerated investment, retrofitting programmes, and targeted support for social landlords to upgrade properties.



The Local Heat and Energy Efficiency Strategy (LHEES) for Moray, covering the period from 2023 to 2028, outlines a strategic approach to support the region’s ‘just transition’ toward a more sustainable, low-carbon, and climate-resilient future. The LHEES aims to enhance building energy efficiency and promote the decarbonisation of heat sources across Moray’s housing stock. This aligns with national climate objectives and looks to ensure that the benefits of the transition, such as lower energy costs, warmer homes, and reduced emissions, are shared equally across communities.

The LHEES acknowledges the links between key national policies, particularly the Scottish Government’s Heat in Buildings Strategy and the Energy Efficiency Standard for Social Housing 2 (ESSH2). Together, these frameworks set out the expectation that Scotland’s homes will transition to zero-emissions heating systems and meet ambitious energy efficiency standards, specifically EPC band B for social housing by 2032, and band C for all homes by 2033.

**12,720**

of Moray homes are off-gas and rely on high-emission fuels, this represents 30% of all Moray homes

**30,850**

homes in Moray will require transition to zero emission heating

In relation to Moray’s current housing profile and the scale of the challenge, the LHEES provides several key data points:

- 12,720 homes in Moray are currently off the gas grid, meaning they are likely reliant on higher-emission or more expensive heating fuels such as oil, LPG, or electricity. These properties will require particular focus in the transition to zero direct emissions heating.
- An additional 30,850 homes across the region are identified as needing to transition to zero-emissions heating systems to align with national targets and climate obligations.
- There are approximately 4,600 private rented homes, 9,500 social rented homes, and 22,600 other housing types in Moray that currently do not meet the future EPC requirements set by the Scottish Government.

These figures highlight the significant retrofit challenge ahead for Moray. Delivering on the LHEES will involve not only technological changes, such as the installation of heat pumps, insulation upgrades, and renewable energy solutions but also coordinated action across local authorities, housing providers, landlords, homeowners, and energy providers. The strategy emphasises the importance of planning, funding, and community engagement in order to achieve a smooth and fair transition that supports economic development, reduces fuel poverty, and contributes meaningfully to Scotland's net zero ambitions.



A 'fabric first' approach to asset investment involves maximising the performance of the components and materials that make up the building fabric, before relying on energy saving products or renewable technology to meet energy standards. Whilst a fabric first approach can reduce capital and operational cost, it can frontload retrofitting expenditure without an immediate return in investment.

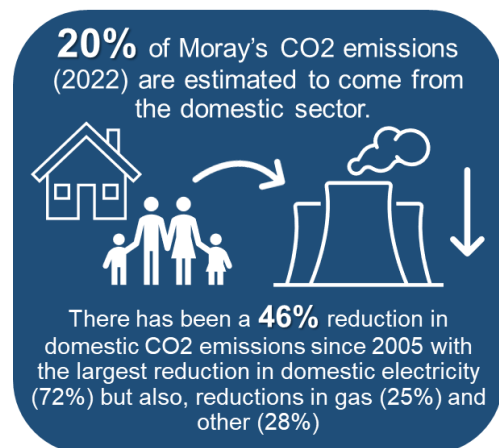


With the energy sector having led the way on decarbonisation thus far, retrofitting Moray homes could now represent the next major step in sustainably meeting energy efficiency targets set during the life of the LHS and beyond.

Moray Council declared a climate emergency on 27<sup>th</sup> June 2019. There followed the publication of Moray Council's Climate Change Strategy covering the period 2020-2030. The strategy is intended as a foundation for considering how Council policies, plans and strategies can contribute to the Council's main climate change agenda. There are nine aims within the Climate Change Strategy, which include supporting a 'just transition' to a low carbon economy and a carbon neutral council by 2030.



In 2022, it was estimated that approximately 20% of Moray's total CO<sub>2</sub> emissions originated from the domestic sector, which includes emissions from heating, lighting, and powering homes. This makes residential energy use a significant contributor to the region's overall carbon footprint, underscoring the critical role that housing improvements must play in meeting both local and national climate targets.



Despite this ongoing impact, notable progress has been made in reducing domestic emissions over the past two decades. Since 2005, Moray has achieved a 46% reduction in CO<sub>2</sub> emissions from the domestic sector.

Domestic electricity emissions have seen the most dramatic decrease, falling by 72%, while domestic gas emissions have dropped by 25%, this is likely due to a combination of more efficient gas boilers and better insulation. Other domestic emissions, including those from oil, solid fuels, and biomass, have declined by 28%, however, these fuels still represent a considerable challenge, particularly for homes in rural and off-gas areas.



Moray is home to five recorded heat network sites which provide a sustainable and affordable source of heat to a variety of buildings, including residential properties. The LHEES acknowledges there is significant potential to develop further heat networks in Moray. Several locations in Moray have been identified as potentially suitable including Buckie, Burghead, Elgin, Forres, Keith and Lossiemouth.

Moray currently has a heat network project taking place in Elgin Town Centre which is being supported through Scotland's Heat Network Fund, the Low Carbon Infrastructure Transition Programme, the Social Housing Net Zero Heat Fund and the Heat Network Support Unit. The project has received grant funding of £49k and is looking at combining two potential heat network areas in the town centre of Elgin and the adjacent area around the Moray Leisure Centre and Elgin Academy. Despite these advancements, the LHEES recognises that most domestic properties in Moray will not be in areas suitable for heat networks and will instead require individual heating solutions.

### 8.2 LHS Priority 4: What do Residents, Partners and Stakeholders Think?

Informed by resident feedback and housing system analysis, partners and stakeholders came together to define the major barriers that need to be overcome in the Moray LHS to improve housing condition, energy efficiency and carbon emissions. Key local challenges which drive the need for future partnership, investment and delivery activity include:

<p>Stakeholder and partner consultation outcomes</p>	<p><b>Key issue:</b> Tight budgets and high upgrade costs block property improvements - especially in Moray's low-wage economy. Landlords also struggle to fund works without increasing rents.</p>	<p><b>Key issue:</b> Tenants and homeowners are often reluctant to allow intrusive home improvements, even with funding in place. This is especially challenging for older households or those who have lived in their homes for years.</p>	<p><b>Key issue:</b> Knowledge gap of renewable and low-carbon options. Without trusted guidance, households unsure what to install or how to operate renewables miss out on benefits and even create new maintenance issues.</p>
	<p><b>Key issue:</b> Moray's rural nature and older housing stock, that are mostly houses rather than flats, makes retrofitting harder and drives up the cost of achieving affordable warmth.</p>	<p><b>Key issue:</b> Meeting energy standards in Moray is a major challenge, with higher fuel poverty, poorer stock, and limited construction capacity—all worsened by affordability pressures.</p>	<p><b>Key issue:</b> Whilst achieving affordable warmth and moving to low carbon heat sources was agreed as priorities for the LHS both groups were concerned about the electricity network's capacity to accommodate this transition.</p>

### 8.3 LHS Priority 4: Our Actions

Partners and stakeholders co-produced a range of options and ideas to proactively address the challenges associated with building more homes in Moray. Each priority is supported by a set of actions that will enable the Council and its partners to deliver LHS Priority 4 outcomes over the next five years. [View the LHS Action Plan here.](#)

## 9 Delivering Local Housing Strategy Outcomes

### 9.1 LHS Implementation Framework

The actions set under each LHS Priority, will be developed into a series of detailed action plans which set specific, timescales, resources and partner responsibilities to guide implementation and delivery and to provide a strong basis for monitoring LHS progress.

Aligned to each LHS Priority Action plan, a range of LHS Outcome measures will be developed to track change over time including baseline indicators and delivery actions. The LHS Outcome framework will provide a strong basis for evaluating LHS impact across Moray over the next 5 years.

Given that LHS Outcomes often extend in reach far beyond direct housing activity, they are best delivered through a strong partnership network. The LHS Implementation Group is a new mechanism to stimulate and co-ordinate this partnership activity based on the LHS Steering Group assembled to coordinate LHS Development. The LHS Implementation Group includes partners from Housing Strategy, Housing Operations, Private Sector Housing Team, Homelessness Team, locally operating RSLs including Grampian Housing Association and Osprey Housing, and the Moray Health & Social Care Partnership.

The objectives of the Group are as follows:

- to track progress and measure impact of the LHS Action Plan via the LHS Monitoring and Evaluation Framework
- to ensure that LHS outcomes are linked effectively into other strategic plans across the Moray Community Planning framework
- to consider investment priorities and maximise shared resources
- to exchange information and planning data
- to review outputs from housing related research and insight, making recommendations to inform LHS implementation.

The LHS Implementation Group will link into a number of existing partnership forums which plan, implement and deliver housing related investment and activity. The activity across this network will be coordinated by the LHS Implementation Group to ensure partnership, investment and collaboration maximise opportunities to deliver LHS outcomes.

### 9.2 LHS Monitoring & Evaluation

The LHS evaluation framework will clearly set outcome targets for each LHS priority, together with the high level inputs, indicators and timescales that will underpin successful delivery. Following the launch of the LHS, a set of Action Plans will be developed. The Action Plans will set out in detail the delivery programme required to achieve each of the outcomes in the LHS; to drive implementation and facilitate monitoring and review against milestones.

The LHS will be monitored annually against each Action Plan, tracking progress, enabling remedial actions to be pursued if necessary and offering assurance to Moray Council Elected Members that services/partners are on track to deliver specific LHS workstreams.

The LHS Action Plans will be reviewed annually by the LHS Implementation Group. In addition to strategic monitoring, partners will be responsible for monitoring the progress of related housing plans including the SHIP, the Local Heat and Energy Efficiency Strategy, the Housing Contribution Statement and the Rapid Rehousing Transition Plan.



### 9.3 Resources

This is an ambitious Local Housing Strategy with considerable investment required to deliver each LHS priority. However, LHS delivery is set within a changing economic environment, not only in Moray but across Scotland and the UK. This uncertain financial and resource context reflects a backdrop of increasing need for housing services and demand for affordable housing. There is therefore a real need to ensure that LHS resources are maximised through partnership, innovation and targeting preventative activity over the next 5 years.

There is a wide range of resources dedicated to Local Housing Strategy activity in Moray, as outlined for each LHS Priority below.

**Table 9.1: Main Resource & Funding Sources for each LHS Priority**

Priority 1: Building more homes creates sustainable communities and enables economic growth	Priority 2: Making better use of existing homes prevents homelessness and improve housing choice	Priority 3: Partnership working maximises housing's role in improving health and wellbeing	Priority 4: Improving property condition and achieving affordable warmth is enabled in all homes
Scottish Government Affordable Housing Supply Programme Moray Growth Deal Funding UK Government Levelling up Funding UK Government Plans for Neighbourhoods Funding Just Transition Funding Housing Legacy Funding from Renewables Sector Scottish Land Fund Key Worker Housing Fund Council Tax 2 <sup>nd</sup> Homes funding Affordable Housing Policy contributions RSL borrowing and investment Private Developers borrowing and investment	Moray General Fund (homelessness and housing support services) Homelessness prevention funding Empty Homes Partnership funding Private Sector landlords Private Developers Voluntary Organisations RRTP	HSCP funding NHS funding Third sector funding Private Sector Housing Grant (aids & adaptations) Private Sector Housing Grant (aids & adaptations) Stage 3 funding (RSL aids & adaptations)	HEEPS (ABS) funding ECO funding Public Utilities Private Sector owners and landlords RSL borrowing and investment Moray General Fund (private sector housing team) Private Sector owners and landlords Private Sector lenders

In addition to dedicated resources delivering LHS priorities, LHS implementation is supported by a wider resource framework of staff, land resources and the existing housing stock.



## Affordable Housing Supply Programme

Moray’s Strategic Housing Investment Plan is supported by grant subsidy from the Scottish Governments Affordable Housing Supply Programme. Based on SHIP Projections for 2025/26-2029/30, total investment in affordable housing will be approximately £115m over the lifetime of the Local Housing Strategy, with £45M of grant funding the programme anticipated, and the remaining funding comprised of:

- £3.5M of Council Tax Second Homes discount money (see below)
- £0.25M of Developer Contributions (from Section 75 Agreements)
- £65M of private finance from Moray Council and RSLs.

The Resource Planning Assumption (RPA) for the Council’s strategic local programme for 2025/26 was £8.9M, with outturn spending estimated to be £11.2M. This reflects the very strong track record in Moray of enhancing the annual RPA by attracting slippage funding from other local authority areas in the national programme.

Over the last 5 years, through the RPA process, Moray Council have been allocated £42.7M of Affordable Housing Supply Programme grant funding. Over the same period, Moray Council have been successful in boosting this allocation by 18%, with investment of £50.3M achieved in affordable housing development projects. The Council will continue to maintain a healthy programme of deliverable projects in order to maintain this additionality during the course of the 2025-30 LHS.

**Table 9.2: SHIP Programme Resource Planning Assumptions 2024/25 – 2027/28**

Financial Year	Resource Planning Assumptions	Final outturn
2022/23	£8.927M	£11.332M
2023/24	£8.902M	£7.091M
2024/25	£7.120M	£10,512M
2025/26	£8.995M	£11.249M

Prudential borrowing by Moray Council’s Housing Revenue Account and private lending by Registered Social Landlords is the key funding component used in addition to Scottish Government Housing Subsidy to support the delivery of new affordable homes in Moray.

The estimated number of completions for SHIP Period is 2025/26 – 2029/30 is 785 units.



## Council Tax Reserve Income from Reduction of Discount for Empty and Second Homes

Moray Council have funding available through income raised each financial year from the Council Tax levy associated with Empty Homes and Second Homes. This funding assists in supporting the delivery of the affordable housing programme, funding both new build activity and empty homes activity. Furthermore, in 2025, Moray Council and Aberdeenshire Council agreed to collaborate on a shared approach to empty homes interventions. The Scottish Empty Homes Partnership have funded a shared Empty Homes Officer to build on Aberdeenshire Council's well established approach.

## LHS Resource Projections

Lead partners who have responsibility for providing resources to support delivery of LHS actions include the Scottish Government, Moray Council, local RSLs, NHS Grampian as well as the independent and private housing sectors and other public bodies.

Whilst it is difficult to predict the level of Scottish Government Funding to be allocated to local authorities over the next five years, the 2025/26 baselines position provides an indication of potential funding availability.

The General Fund housing budget for Moray Council is outlined in Table 9.3 below. Over £2.5M pounds of housing related expenditure will be invested over the next five years to support services such as homelessness and temporary accommodation, housing support services, and private sector disabled adaptations.

**Table 9.4: Moray Council General Fund Expenditure 2025/26**

Council General Fund Spend by Category	Total projected expenditure (2025/26) (£)
Homelessness and Temporary Accommodation, Homeless Assessment and Housing Options, Temporary Accommodation including commissioned projects	£446k
Gypsy/Traveller Officer	£11k
Private Sector Disabled Adaptations	£45k
<b>Total General Fund Housing Resources</b>	<b>£502k</b>

Furthermore, analysis of the Housing Revenue Account reveals that over the period of the Local Housing Strategy 2025-30, Moray Council will invest £147.5M in the Council's housing stock and the delivery of housing services. This includes £85.2M on management and maintenance services, and £62.3M on existing stock improvement through capital funding.

In total, over the next 5 years, total Moray Council spending on housing services will total £150M.

This substantial investment does not include the financial commitment of the three major social landlords (Grampian HA, Langstane HA and Osprey Housing) or the private housebuilding industry operating in Moray. The resource impact of Local Housing Strategy therefore stretches far beyond meeting housing need. The delivery of housing and related services supports the Moray economy and construction sectors, employment in the public, private and independent sectors alongside the valuable impact of preventative investment in housing on meeting health and social care needs.



## 10 Local Housing Strategy Action Plan

LHS Priorities address the main housing issues which need action, investment and partnership over the next 5 years and have been co-produced with partners and stakeholders from public, private and independent sectors.

A full option appraisal was undertaken as part of the LHS development process which systematically assessed and prioritised the actions required to deliver LHS Priorities in terms of impact, deliverability and maximising resources. Full details are included in the [LHS Priority Action Plan](#). Based on the outcomes of the option appraisal process, LHS Actions have been sequenced in order of importance.

The Action Plan, activities and targets will be reviewed annually to ensure partners are able to respond flexibly to changes in planning, policy and housing need across the Moray area.