

Formal Partner Responses to the Draft LHS 2024-2029

ELTRP Formal Response to the draft LHS 2024-2029

Whilst the draft strategy has captured many of the key housing issues ELTRP would like to highlight the following points:

- Not all tenants and residents agree with the flood protections scheme. East Lothian Council should be seeking the views of people living in the areas, not adopting a flawed scheme.
- East Lothian Council should be prioritising their current properties, ensuring every single property is wind and watertight.
- Engagement needs to be wide ranging, ongoing and meaningful. This means taking onboard what communities want.
- Affordable housing needs to be 'affordable'! There needs to be a clear formula in place that shows people what it means.
- Before East Lothian Council's allocation policy is reviewed their needs to be a rent restructure to make rents fairer for all tenants
- A review of the voids process should take place to reduce the number of current voids and turn around times. This will increase supply and increase income into the Housing Revenue Account

ELTRP agrees with the vision, prioritise and action plans set out in the strategy

Housing Strategy Team's Reply to ELTRP

Flood Protection Scheme

Regarding the flood protection scheme we are aware that there has been some controversy around the flood protection scheme. The LHS itself has no ability to influence flood protection schemes. In terms of opportunities to engage the Flood Protection Project Team consulted widely on the Scheme, consulting with various stakeholders including public stakeholders such as local interest groups and the public. Public exhibitions were held in Musselburgh during June 2023 providing an opportunity for people living within the area to provide their feedback and shape the outline design.

SHQS

In terms of prioritising current properties, the Scottish Housing Quality Standard (SHQS) safeguards tenants' homes and social landlords must ensure that these homes: are energy efficient; safe and secure; not seriously damaged; and have kitchens and bathrooms that are in good condition. As a landlord the Council have a duty to ensure that the house is, at the commencement of the tenancy, wind and watertight and in all other respects reasonably fit for human habitation, and to keep the house in such condition throughout the tenancy. At the end of 2022/23, 86.94% of Council owned properties met the SHQS. Energy Efficiency Standard for Social Housing (ESSH) failures account for the 9.14% of those non-compliant properties, which is on par with the national average (9.6%). Remaining non-compliant properties are made up of cases where improvement works were unable to be completed for technical and/or social reasons and these are classed as being exempt or in-abeyances. The LHS contains an action to develop a Council Housing Asset Strategy, this will ensure that the Council's homes remain sustainable and are fit for purpose over their lifecycle. Delivery of this Strategy will take place over two phases. The first phase will set out the framework for improving the Council's property portfolio economically over a five-year period, through annual investment plans. The second phase seeks to expand the Strategy towards taking a 'whole organisation' approach by adopting the principles of integrated asset management.

Engagement and Consultation

Regarding the statement that engagement should be wide-ranging, ongoing and meaningful, extensive engagement was undertaken in preparation for the draft LHS. We spoke to over 1,000 people over a period of one year. A number of focus groups were held and surveys were issued on the Council's website. Less traditional forms of engagement included Officers taking part in walking football, lunches, gardening, attending meetings with residents in sheltered housing and activities put on by youth clubs. This provided opportunities for those who might not have attended a formal consultation event to participate in the process. Further to this, consultation events on the draft LHS were held within each of the region's Area Partnerships allowing interested parties to provide feedback on the draft strategy and actions. An annual update to the LHS will be issued every year, there will be an opportunity for interested parties to engage with this process to ensure that communities have their say. We would welcome further input from ELTRP on the LHS and its actions at through-out the 5 year period.

Affordable Housing

In terms of the need for affordable housing to be 'affordable', there is currently no definition of affordable housing which makes having a formula problematic. NPF4 defines it as "Of a reasonable quality that is affordable to people on low incomes. This can include social rented, mid-market rented, shared ownership, shared equity, housing sold at a discount, self-build plots and low-cost housing without subsidy." Because 'affordable' is different for everyone depending on their income, if they have a disability, household size etc, the Council will continue to offer a wide range of affordable options to residents including mid-market rent to ensure that as many people as possible can access affordable housing. Rents within East Lothian Council properties have historically been low and remain amongst the cheapest in Scotland showing the Council's commitment to providing housing that is affordable.

Rent Restructure

In regard to the need for a rent restructure to make rents fairer to all tenants East Lothian Council consult with tenants, tenants and residents groups and East Lothian Tenants and Residents Panel (ELTRP) on any proposals to increase rents. Letters and questionnaires are sent out to all council tenants seeking their views. As previously noted, rents charged by East Lothian Council are some of the lowest in Scotland and represent excellent value for money.

Voids

The LHS recognises the impact that voids have on the housing system and the importance of reducing turnaround times for void properties. This is reflected in action 2.3 which states "In recognition of the impact voids have on homelessness, we will review the voids procedure and process."

Many thanks again for taking the time to engage with the process, we look forward to continuing to work with ELTRP as we develop the LHS.

MND Scotland Formal Response to the draft LHS 2024-2029

10% of the total supply of affordable housing will be wheelchair accessible, with a minimum of 100 units delivered over 5 years.

MND Scotland welcomes this proposal and is pleased to see it written as a commitment rather than a 'target'. This commitment is essential for people in East Lothian living with MND, a rapidly progressing and debilitating terminal illness. As part of our research for our housing report 'No time to lose: addressing the needs of people with MND' we found that East Lothian Council's wheelchair accessible housing stock was just 0.28%, based on a Freedom of Information request we made in 2021. Our research found that while some councils set a target to build accessible homes, many do not meet it. We would like East Lothian Council to ensure they put robust mechanisms in place to monitor progress on achieving this goal from the outset of the Local Housing Strategy

East Lothian Council establishing mechanisms to ensure a target of 5% of new build market housing is built to wheelchair accessible standards. We also welcome the above proposal. We do however hope that this target will not purely be aspirational and that the local authority will introduce robust mechanisms to ensure it is met. As well as East Lothian Council setting its own target, we would like to see a target of 5% being a condition of planning permission and land sale. We believe that local government has a crucial role to play not just in providing accessible homes to their communities but in influencing developers to do so too.

Review Scheme of Assistance including BTS properties and Recruit a Private Sector Housing Officer to deliver the Scheme of Assistance and enhance non-financial assistance on offer to residents living in the private sector. We very much welcome a review of the Scheme of Assistance. A Private Sector Housing Officer would be a valuable resource and we question if one would be enough. Improving the Scheme of Assistance is not just essential for disabled people but should also relieve pressure on social housing, if more people are enabled to stay in their homes. Our housing report explored adaptations and the Scheme of Assistance in detail for people living with MND. It is essential that people with an illness like MND receive their adaptations swiftly. Through an FOI request in 2021, East Lothian revealed average waiting times for adaptations:

Ramps: 475 days

Wet room: 273 days

Grab/hand rails: 29 days

Our housing report calls for a formal fast-tracking process for people with illnesses like MND.

Our report found also found a lack of clear and consistent information on adaptations. Many people living with MND didn't know the Scheme of Assistance was available and paid for adaptations

themselves. Others found navigating the application process very complex. Processes often fail to consider different communication needs eg for those who cannot speak on the phone, or easily navigate forms. We hope part of the role of a Private Sector Housing Officer would be to improve and visibly promote the Scheme of Assistance on the council's website and literature. In addition, we ask local authorities to work with health and social care at all points of adaptations processes. This includes working with OTs and specialist nurses who are well placed to advise on the speed of the disease and adaptation needs – typically ramps, grab/handrails and wet rooms. Input should be sought at the point of application.

Carry out a review of the Council's Allocations Policy We very much welcome the proposed review of the allocations policy and the recognition that systems can be too slow, and overly bureaucratic. We believe an allocations policy which recognises terminal illness as a priority group and fast-tracks people with MND for accessible housing should be introduced. We would be more than happy to provide input to this review, as we have worked closely with other local authorities who have implemented such changes to their Common Allocations Policy.

Carry out a review of the Council's Void policy We also very much welcome a review of the Council's Void policy and the proposed development of an Empty Homes Strategy. These should look at how many empty homes or void properties could be made 'wheelchair accessible' or suitable for adaptations. Our Advocacy team has had considerable success working closely with local housing officers who have identified suitable void properties, eg ground floor, which have been matched to people with MND who need them. The properties have then been made fully suitable for their needs.

Other comments Question 6 refers to the strategic vision. We disagreed with this vision because it did not recognise the important of accessible housing. While its importance is noted on the following page of the consultation document, we think it should have more prominence in the vision.

Housing Strategy Team's Reply to MND Scotland

Wheelchair Accessible Housing – Affordable

The Council recognises the shortfall in wheelchair housing that was identified through the HNDA and the ambitious target set within the LHS reflects this need. The Local Housing Strategy will be reviewed with progress monitored annually through an Outcome Action Plan per guidance issued by the Scottish Government. This will enable the council to monitor progress against targets on an annual basis.

Wheelchair Accessible Housing – Private Sector

East Lothian Council establishing mechanisms to ensure a target of 5% of new build market housing is built to wheelchair accessible standards as stated in action 4.13. Although there is no mechanism currently in place it is the intention that East Lothian Council will establish mechanisms to ensure a target of 5% of new build market housing is built to wheelchair accessible standards through LDP2 by working alongside planning colleagues. In addition proposed changes brought about by the Scottish Government through “Enhancing the accessibility, adaptability and usability of Scotland's homes” should improve minimum standards and make homes more accessible. Under National Planning Framework 4 (NPF4) development proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision, will be supported. We are also in conversations with the Scottish Government about how to ensure that the target is met. There is significant push back from private developers across Scotland on this target. As such we will be required to work closely with Scottish Government colleagues.

Scheme of Assistance / BTS / Private Sector Housing Officer

We recognise that our Scheme of Assistance is in need of a refresh and that the intention to recruit a private sector officer will allow for a greater focus on the Scheme of Assistance, it is unlikely that more than one officer will be recruited. An important part of the role will be to update and improve literature that is available on the Council's website. The Care & Repair team offer help and advice to those in need of adaptations and should be able to assist anyone who is finding the process complicated. The Council are committed to allowing people to remain in their own homes where this is their preference and acknowledge the important role that adaptations play in this. There is significant pressure on the adaptations budget which is why Action 4.15 aims to explore alternative options of funding major adaptations in the private sector to ensure we meet our shared statutory obligations to provide additional funding for adaptations. Due to demand for the service and complexity of some cases waiting times are inevitable in some cases, additional funding enable a reduction in these times. Health and Social care are a key partner in delivering the scheme of assistance and the teams work closely together to deliver adaptations. Prioritising people with MND could be considered as part of the wider SoA review.

Allocations Policy

In terms of the Allocation Policy, we welcome your offer to provide input into the review and will be happy to contact you as part of our consultation process.

Void Policy

The Council recognises the importance that improving void times will have on housing supply and will attempt to look at whether void properties can be made wheelchair accessible. This would enable the Council to identify properties in areas where there is a need for more wheelchair accessible housing without the need for delivery as part of a new development. This would be on a case by case basis where there is an identified need for a particular property type and not all properties will be suitable. In terms of using empty homes to provide more wheelchair accessible housing this would rely on individuals purchasing the property or the current owner being willing to undertake the work. The Council may be able in some cases to identify properties which would be suitable for wheelchair user. It should be noted that this could only be undertaken with the permission of the property owner and where Council resource permits.

Strategic Vision

The strategic vision does state “People in East Lothian have access to warm, high quality, affordable homes **which meet their needs**” thus demonstrating a commitment to accessible housing. In addition Chapter 4’s Priority Outcome states “Housing and support services are effective, accessible to, and will meet the needs of those most vulnerable in the community” further demonstrates the importance the Council is placing on providing accessible housing for those who need it.

Sustaining North Berwick Formal Response to the draft LHS 2024-2029

1. Introduction

1.1 Sustaining North Berwick is a community-based group interested in sustainability and biodiversity that:

- raises awareness about the challenges posed by climate change, resource depletion, loss of biodiversity and environmental degradation.
- encourages activities from all sectors of the local community to create a locally resilient and sustainable, zero-carbon, zero-waste future.
- collaborates with other organisations to develop sustainable thinking and action.

1.2 We recognise the huge challenges that East Lothian Council faces due to the extent of housing need, the age of the housing stock, the expensive local housing market (especially in North Berwick Coastal) and the lack of resources to provide sufficient homes for people on low and modest incomes.

1.3 In North Berwick both home ownership and the Privately Rented Sector are beyond the reach of people on low incomes. This, combined with the high number of empty homes and Short Term Lets (STLs) means young people and key workers have little chance of finding homes here (as recognized on p39 of the Draft Strategy). This is a major threat to sustainability and contributes to staff shortages in essential services.

1.4 We support the Strategy's vision and priorities and agree with most of the proposed actions. We note that the Action Plan is ambitious and that a lack of resources will have impacted on the timescale chosen for completing them. However, ***we disagree strongly with the Action in relation to STLs and have concerns about the lack of priority and urgency given to some of the Actions in relation to Climate Change.***

2. Short Term Lets

2.1 We welcome that the Draft Strategy notes the challenges posed by the relatively high number of Short Term Lets (STLs) in North Berwick Coastal. According to the Supporting Paper 5 on Research into the Private Rented Sector (PRS) in East Lothian, about 60% of East Lothian's STLs are to be found in the ward, amounting to 222 out of 387.

2.2 We note that the Research Paper states on page 18 that 'short-term letting account for 22% of the lettings sector in North Berwick, suggesting that properties suitable as residential homes may have been taken out of the PRS to become STLs'. Furthermore, on page 16 the paper argues that 'in the areas where there are significantly higher proportions of STLs, it could be concluded that short-term letting may be restricting the PRS residential market. The impact of this aligned to limited social housing supply, means reduced housing options in these localities'.

2.3 We note that the Council will ‘work in partnership with local communities and the tourism sector to achieve a balance which meets the needs of distinctive communities in East Lothian’ (p63). We feel that there is already an imbalance in North Berwick in terms of there being an adverse impact on both the PRS (as argued above) and on the long-term neighbors of STLs who experience a loss of community and can feel an unfair burden is placed upon them for managing communal areas/gardens etc.

2.4 In view of this, we are disappointed with Action 2.11 which is limited to monitoring STLs ‘to investigate if they are negatively impacting on the PRS and the wider housing system’. Moreover, the proposed deadline of 2028 suggests that no action will be taken to address this, despite the conclusions of the Research. ***This is not acceptable for the North Berwick Coastal area*** because of the high number of STLs, the effects on key workers seeking homes as acknowledged in the Draft Strategy and the strong feelings within the community.

2.5 We believe that the Council has overstated the economic benefit of STLs whilst overlooking the costs in terms of the long-term residential lets lost and the negative impact on community cohesion. Council policy appears to be driven by a commitment to promoting tourism regardless of the consequences for long-term residents and those seeking affordable homes.

2.6 We note that research¹ carried out for Edinburgh City Council by MKA Economics Ltd shows that whilst ‘there are positive economic impacts from the use of properties for both residential use and short-term let use’, the gross value added (GVA) effects are ‘greater for residential uses than short-term lets across all property types and all areas’.

2.7 We believe that, for the reasons outlined above and in the interests of community cohesion and resilience in the face of the challenges posed by accelerating climate change during the period of the Strategy, ***it is time to limit the number of STLs in the North Berwick Coastal area***. We recognise that this may not be necessary in other areas of East Lothian with fewer STLs.

2.8 The Council should explore measures adopted by other Local Authorities with tourist hotspots where local people lack affordable housing choices, including imposing planning conditions on new homes to ensure that they are sold or rented as principal residences.

3. Climate change and the nature crisis

3.1 We welcome the key strategic aim of Enabling households to live in high quality and sustainable homes but believe there should be a presumption against development on greenfield sites and where any development will impact on biodiversity.

3.2 We note the massive challenges involved in achieving Net Zero across the range of housing tenures, together with the concerns about the costs involved and the need for a ‘Just transition’ for low-income households especially (p118). We suggest that retrofitting PV solar panels to council houses would mitigate the financial impact of heat pumps.

3.3 We welcome Action 5.5 - Low Carbon Housing Strategy and Action 5.8 - update your design guide to reflect net zero and sustainability ambitions. However, the timescales for these, together with Action 5.1 - Identify areas in East Lothian that are vulnerable to climate change, do not reflect

¹ The Economic Impact of Residential and Short-Term Let Properties in Edinburgh, MKA Economics Ltd, May 2023

the increasingly urgent need to address the interconnected climate and nature crises. In view of the declared Climate and Nature Emergencies, ***we urge the Council to bring forward all three actions for completion by the end of 2024.***

3.4 We ask the Council to add the following to the updated design guide, where they are not already included.

New homes should be:

- orientated to benefit as far as possible from passive solar warmth and to achieve maximum benefit from solar panels.
- optimally sited and equipped with solar panels & batteries, insulation, under floor heating, heat pumps and triple glazing.
- prepared for transition to zero carbon.
- provided with electric vehicle charge points to enable the transition away from petrol/diesel cars.
- supplied water butts and facilities for home composting.
- equipped to harvest rainwater and to recycle grey water waste to reduce the use of clean drinking water for washing machines, toilet flushing and irrigation.
- New housing developments should ensure nature is supported by:
 - planting trees (especially fruit & nut).
 - planting species, including wildflowers, that are appropriate for the geographic area, drought tolerant and enhance local wildlife.
 - making boundaries with hedges instead of fences, using native species.
 - creating wildlife corridors.
 - providing high quality green spaces (not just grass!) such as allotments, community gardens or orchards.

Those responsible for managing greenspaces within housing developments should abide by these guidelines and there should be a means of communication with residents that allows them a say in how these spaces are managed and, if wanted, to take over management.

Housing Strategy Team's Reply to Sustaining North Berwick

Short Term Lets

It is not within the Local Housing Strategies responsibilities to set a control zone or determine decisions of short term lets. This sits with the planning department and the Local Development Plan. The Housing Strategy team are consulted on Short Term Let applications as part of the planning process and object where there we can currently evidence that there will be a detrimental impact on housing as a result of the proposal. The Housing Strategy Team have objected to a number of short term let proposals, however, planning permission is outwith our control and is ultimately a decision for the planning department.

To ensure our evidence to base our consultation responses on is robust and thorough we will use data obtained via short term let licensing which came into force on 1st October 2023. Prior to this we did not have a robust data source for the number of STLs within East Lothian. The data that we obtain from licensing will allow us to paint a fuller picture of the STL situation within East Lothian, including North Berwick. Unfortunately, many owners of STLs waited until the last week or day to apply for a license and as such there is a significant delay in processing these applications and doing all the necessary checks. Once we have the data in full, we can start to analyse it alongside other housing market data. For example, we will be able to tell if the increase in STLs saw a decrease in private rented homes, or if the majority of STLs are also second homes.

We recognise the difficulties many on low incomes, including key workers, have finding suitable accommodation. The ambitious Housing Supply Target alongside a Local Investment Framework will ensure that housing is being delivered where it is most needed.

Development of Housing

East Lothian Council relies on private developers to provide the majority of the affordable housing that is delivered within the region. This is because the Council owns very little land. This means that for affordable housing we have to enter into negotiations with private developers to secure the right size and tenure of affordable housing we'd like to see coming forward. In terms of the development of market housing, policies which influence the size and make-up sits with the Local Development Plan.

If housing is to be equipped with solar panels and batteries, underfloor heating, heat pumps, electric charge points and triple glazing there would be significant cost implications. This would result in a higher specification of home, however, it would also impact on the number of units that could be delivered at a time when housing is in acute demand. Combined with the Cost of Living Crisis which has meant increased construction costs means that the cost of providing new housing units has increased significantly. A balance needs to be struck between the two to ensure that enough housing is being provided while also contributing towards net zero ambitions. The Council's commitment to meeting net zero is reinforced by the action to update the affordable housing specification and design guide to reflect net zero and sustainability ambitions. We will also

work closely with our colleagues developing the Local Heat and Energy Efficiency Strategy as this sets out the steps East Lothian will take to net zero.

Greenspace

We are supportive of the points made in relation to green spaces and this is something that the Council already aim for in developments, it is now also a requirement under the new Planning legislation and National Planning Framework 4 (NPF4). The LHS recognises the importance of green spaces and highlights the need for discussions with communities around their green space needs, in particular in the face of increasing budgetary constraints. "Community engagement, alongside collaboration with Countryside and Leisure, Amenities, Landscape and Planning are crucial to offer a coordinated delivery of well-maintained places". East Lothian Council have limited land of our own, therefore we are almost always reliant on developers to provide affordable housing as part of their developments. Within East Lothian there is a 'Nature Networks' project underway for the county's parks and greenspaces, these principles apply across new housing developments on private land as well as Council land. Many of the principles suggested in the response are included in the Council's Green Networks Strategy SPG and Design Standards for New Housing Areas and are requested by colleagues in Landscape Planning. Your response has been forwarded to colleagues in planning for their attention and colleagues are working with Planners on the next Local Development Plan process. This will incorporate greenspace enhancements for nature as a key aspect of development, to meet new NPF4 requirements around 'securing positive effects for biodiversity' and nature networks requirements.

Homes for Scotland Formal Response to the draft LHS 2024-2029

Home For Scotland (HFS) supports the delivery of affordable housing. A lack of affordable homes may negatively impact lower income families by reducing the amount of time and finances available to address other health and wellbeing needs.

Delivery of affordable and market homes

A greater volume of homes of all tenures requires to be delivered to address the current need and demand gap. The provision of affordable homes as part of a mix of tenures helps to create mixed and balanced communities.

HFS believes the draft Local Housing Strategy (LHS) should recognise the importance of delivering both affordable and market homes, as it is private developers that are predominantly responsible for delivering both.

In broader terms, the draft LHS should also acknowledge the wider socio-economic benefits of home building. This is in relation to job creation, delivering key infrastructure through developer contributions, and improvement in educational and health outcomes.

The draft LHS clearly promotes the delivery of affordable housing. It is important to consider that link between private and affordable housing delivery. A significant proportion of affordable homes that are built are delivered on private led housing sites via Section 75 contributions. It is vital this relationship is properly understood. Any contraction in the supply of private homes will have an inevitable knock-on effect with regards to the supply of affordable homes. It is not safe to assume all affordable homes will be delivered on all affordable tenure sites only.

It is positive that the draft LHS highlights that East Lothian is dependent on the supply of market housing, and land use policies to supply affordable housing. A lack of sites and suitable buildings owned by the Council mean that affordable housing is generally secured through Section 75 agreements. The importance of establishing an all-tenure approach cannot be understated.

Housing Supply Target

We note that the LHS sets an affordable homes target of 294 per annum. This is a positive and ambitious target. However, the role of private sector housing delivery must be recognised and optimised in order to achieve the required levels of affordable housing. Assuming these targets for affordable housing are carried forward into the next Local Development Plan (LDP), then the Minimum All Tenure Housing Land Requirement (MATHLR) will need to be exceeded considerably, considering a 25% contribution to affordable provision from housing allocations.

It is noted that National Planning Framework (NPF) 4 sets out that the current 25% requirement could be increased or decreased, depending upon local factors and available evidence. It is vital that

any uplift in this requirement fully considers viability factors. Robust evidence that any proposed uplift would not impact the deliverability of allocated sites is required, prior to any such policy mechanism being implemented.

Supporting Paper 4- Housing Supply Target, which accompanies the draft LHS, refers to the LHS Guidance (2019). This Guidance document states:

“Areas the Scottish Government would expect to see addressed in each LHS:

a) The local authority’s strategic vision and its priorities for housing across all tenures taking into account both national and local priorities.

b) A summary of the level and type of housing to be delivered over the period of the LHS together with an explanation around how the Housing Supply Target (split into market and affordable) has been determined and a web link or copy of any background paper explaining how it has been identified.

c) Demonstration of a good understanding of need and demand, housing supply, flows across the housing system, between tenures and how this is reflected in the LHS by size, type, tenure, accessibility together with any evidence on whether this has influenced or been affected by any amendments made to the LDP.” (Page. 25)“.

It is unclear, therefore, why the LHS only appears to set out an affordable tenure Housing Supply Target (HST). It is clear that the HST is required to be all tenure, split into market and affordable tenures.

Definition of the Housing Supply Target

Supporting Paper 4- Housing Supply Target defines the HST as being:

“The HST sets out a realistic amount and type of housing that will actually be delivered on the ground over the period of the plan(s). This can be higher or lower than the HNDA housing estimate. The HST should cover all tenures and set out the expected broad split between market and affordable housing. Factors such as housing policies, available finances and capacity of the construction sector are used to translate the HNDA estimates into the HST.” (Page. 1).

This is a confusing statement, in light of the requirements of NPF4, which states:

“Planning must also enable the delivery of good quality, affordable homes by allocating enough land in the right locations to meet current and future needs and aspirations.” (Page. 11).

It is unclear why; therefore, the Council considers it potentially appropriate in principle to set a target below the identified housing estimate outlined in the Housing Need and Demand Assessment (HNDA), which is confirmed as robust and credible. All need and demand outlined in the HNDA must be met in full, as set out in NPF4.

Housing Supply Target Figures

The Steady Growth HNDA3 scenario sets an all-tenure annual figure of 476 homes per annum across East Lothian (316 affordable, 160 market). HNDA2 sets out an estimate requirement of 553

new units per annum of which 476 should be affordable and 160 market housing. Affordable tenure HST is then set at 294 units per annum. The Scottish Government set out a final MATHLR of 6,500 for East Lothian. This the minimum number of units to be delivered. This equates to 650 homes for annum, as a minimum.

The HNDA3 all-tenure annual figure is well below this, suggesting significant work is required to uplift the projected HST to form an acceptable Local Housing Land Requirement (LHLR) figure.

Supporting Paper 4- Housing Supply Target inaccurately states that there is sufficient housing already identified through LDP1 to meet the MATHLR. The LHLR should begin from the adoption date of the LDP for a period of 10 years post adoption (not from 2023-2033). This would be 2026-2036, based on the most recent Development Plan Scheme (DPS) projections.

The draft 2023 Housing Land Audit (HLA) outlines that the total “deliverable” supply is currently 8,184 units. Expected completions from 23/24–25/26 are 3,347 units. These units require to be removed the assessment, as they will take place before the new plan is adopted. As such, the actual maximum deliverable supply which could contribute towards meeting the LHLR for the next LDP is at most 4,837 (i.e., the remaining figure from 26/27 onwards), assuming a best-case scenario that all remaining sites are deliverable.

There is currently a housing crisis in Scotland.

The draft LHS may risk failing to robustly address this crisis, by planning for the delivery of too few new homes, across all tenures, but particularly the private sector, unless specific issues are clarified.

It is vital that enough homes are delivered across all tenures to meet the need and demand within each local authority area and housing market area.

Significant work is required to be undertaken to uplift the HST figure to form an appropriate LHLR figure, which is expected to exceed the MATHLR: “The MATHLR is expected to be exceeded in the local development plans Local Housing Land Requirement.” (NPF4, page. 143)

Evidencing Unmet Housing Need

The HNDA toolkit count is based on a very narrow definition of unmet need. Household projections are based on past trends and the HNDA often estimates that most of the demand for affordable housing is for social rent. This is due to the inherent inefficiencies in the model.

Due to these inefficiencies, it is important that future policies drive the delivery of a far greater number of new homes than accounted for in the HNDA.

Given the deficiencies of the HNDA toolkit and process, it is considered that the (nearly) completed primary research being undertaken by HFS regarding capturing existing unaccounted for need must be given great weight in forming housing land target and requirement figures.

This research is extensive and robust, and has been prepared, in part, in response to the Local Development Planning Guidance (2023), which states: “However, where more recent information is available this should be used as it enables the Evidence Report to be more up-to-date in looking to the future, for example updated household projections, local need figures or a relevant change in local, regional or national policy.” (Page. 63)

Consequently, given the close working relationship between the LHS and the LDP, it is considered that any new evidence of unmet housing need should be taken into account in an LHS prior to it being approved by the Council.

Rural Development

Additionally, NPF4, at various stages and through various levers, seeks to promote rural development. In particular, Policy 29 (Rural development) seeks to “encourage rural economic activity, innovation and diversification”, whilst also enabling a “balanced and sustainable rural population” where “rural communities and businesses are supported”.

Our ‘Social and Economic Benefits of Home Building in Scotland’ report evidences how key housing related indicators (inclusivity, quality of life, environmental sustainability and economic growth) generate positive social and economic outcomes in a number of key policy/strategy documents published by the Scottish Government including: Housing to 2040, the National Performance Framework and the Just Transition Commission Report.

Home building across Scotland makes significant contributions beyond the construction of the homes themselves that help to support new and existing residents by providing essential community infrastructure. Developer contributions are used towards facilities related to the proposed development – for example: payments towards new school classrooms, local highways improvements, public open space and other community facilities.

Home builders can, in certain circumstances, also make direct financial contributions to support affordable housing provision. Using data from 2019, it is estimated that Scottish home builders contributed a total of £179m through Section 75 agreements in 2019; the home building sector supported 79,200 direct and indirect jobs. This is equivalent to 3.5 jobs for every home built.

With the majority of Scotland’s SME home builders active in smaller and rural areas, this provides crucial employment and business opportunities to the local community, which not only sustains but helps them grow sustainably.

Energy Efficiency

Increasing the scale of well-designed, energy-efficient homes also plays a key role in delivering improvements to health, education, regeneration and carbon reduction outcomes as well as housing access for all.

Homes with poor insulation or inefficient heating can result in fuel poverty, causing stress for lower income families who may be unable to afford both fuel and food. On average, 89% of all new homes built by HFS members meet at least an EPC grade ‘B’ standard. In terms of carbon reduction, surveys show that, increasingly, home builders are embedding zero emissions heating systems and enhanced energy-efficiency measures into their developments.

The Climate Change Act 2019 commits Scotland to net-zero emissions of all greenhouse gases by 2045. New homes are measured against building standards which outline a number of criteria which all developments must meet in order to gain a building warrant. With respect to

environmental sustainability, home builders must comply with reducing carbon emissions through minimising both the waste of energy and the use of carbon-based energy systems. In addition to the expansive social and economic benefits of home building, the delivery of a higher number of new homes would provide increased environmental benefits.

Accessible Housing

The “Housing Supply & Affordability” section of the consultation survey states that, from the previous consultations and additional research that has been carried out, the Council have found the key challenges within housing stock and affordability include that 60.2% of lower quartile income (low income) households are unable to afford home ownership. The needs of local communities, and their ability to flourish, as set out in LHS Priority Outcome 1, includes the ability to purchase a home.

The LHS states the aim of ensuring 10% of the total supply of affordable housing is to be developed to wheelchair accessible standards, with a minimum of at least 100 units of wheelchair accessible housing to be delivered over the 5 years. The LHS also aims to establish mechanisms through LDP2 to ensure a target of 5% of new build market housing is built to wheelchair accessible standards.

The LHS references that need and demand for specialist housing was provided through SES HNDA3, although acknowledges that due to data limitations it cannot give an exact figure on expected demand by tenure. HNDA3 for specialist housing provision references some potentially inadequate evidence itself such as the Horizon Housing Association report ‘Still Minding the Step’ which uses English House Condition Survey data to estimate need in Scotland for wheelchair use.

The stated aims of the LHS make it unclear on the level of provision, i.e. is it 10% within Section 75 affordable housing provision plus 5% private sale housing is all wheelchair standard?

Furthermore, it is important to consider that the Scottish Government’s definition of what classes as wheelchair housing is likely to change following the Accessible Home Standard consultation.

Changing Population

In terms of general challenges to consider, it is vital to be cognisant of the projected increase in the total population, the ageing population and the number of households that are set to occur.

The LHS states:

“The county is expected to see the second largest population percentage change in Scotland from 2023-2033. In this period, it is predicted that the population will increase by 6.3%.” (Page. 18) and “65 to 74 will also have a significant increase in population of 23.2%, highlighting East Lothian’s ageing population.” (Page. 19)

These factors all require to be considered in the setting of local housing requirement figures.

Additionally, large-scale planned infrastructure projects are required to be considered in setting housing figures. These include the Blindwells development, the development of a new and fully accessible two platform station on the East Coast Main Line in East Linton, funded projects via the City Deal, and the Musselburgh Flood Protection Scheme.

Finally, it is important to consider the ongoing affordability issues in East Lothian. The LHS states: “House prices in East Lothian have increased by 22.6% over the past five years and were 40% higher than the Scottish average during 2021/22. The housing market within East Lothian is less affordable than in many other areas.” (Page. 60)

Housing Strategy Team's Reply to Homes for Scotland

Thank you for taking the time to respond to our draft consultation. We appreciate your comments and will take them into consideration when preparing the finalised strategy. We have reviewed your response and grouped replies into appropriate themes below.

Housing Across All Tenures

The draft LHS recognises the pressures impacting upon housing across all tenures as well as the importance of communities, priority outcome 1 states the intention that "Communities are supported to flourish, be distinctive and well connected." The LHS also acknowledges the important role that private developers play in the delivery of affordable housing, there is recognition that the majority of housing comes from private developments. The lack of sites under Council ownership is also recognised as a key reason for the importance of private development. The LHS also looks at infrastructure and during consultation one of the main areas of concern was the lack of infrastructure surrounding new housing developments.

Affordable Housing Contribution

The current Local Development Plan 2018 (LDP) sets out an affordable housing quota of 25%. It states that a 25% affordable housing contribution is required from developers of new housing developments consisting of five or more units. Currently two exceptions can be found in East Lothian, within the Blindwells development, where contributions lie at 30% and at Letham Mains, Haddington which is nearly at completion, where a 17% affordable housing contribution was made. Any decisions undertaken to increase or decrease the minimum affordable housing quota will be supported by robust evidence.

Delivery of Affordable Housing

The Council also supports the delivery of affordable housing and 995 affordable housing completions were delivered over the course of the last LHS. The draft LHS has set housing supply targets which will increase the provision of affordable housing throughout the county. The ambitious targets contained within the LHS will help to increase housing supply across the county. The creation of a local investment framework will direct strategic investment to deliver homes to ensure a balanced mix of house types and sizes across all areas to meet local needs.

Housing Supply Target

The ambitious targets set in the draft LHS will require the support of private housing developers. The updated version of the LHS will include an updated Housing Supply Target including a market housing supply target which has been arrived at following discussions with colleagues in the planning department. Both the MATHLR and Local Housing Land Requirement are set by the planning authority, however, under regulation 9 of the 2023 LDP guidance the LDP must “have regard to any local housing strategy (LHS).” Under LHS guidance consideration should be given when setting a housing supply target to “Economic factors which may impact on demand and supply”. It is well known that the Cost of Living Crisis has resulted in an increase in construction costs across the board and it is therefore entirely prudent of the Council to recognise this when setting what is a realistic target for the supply of housing within the county. The lack of sites in the Council’s ownership must also be given due weight, LHS guidance recognises the impact that “potential inter-dependency between delivery of market and affordable housing at the local level;” may have on the Housing Supply Target. This is particularly relevant in East Lothian where most of the affordable housing is delivered within larger market housing developments. The Housing Supply Target must be realistic and deliverable. This means that it is highly dependant on Scottish Government subsidy, which has yet to be confirmed at the time of writing. While Guidance does require the LHS to provide a market housing supply target, this feels outdated when considering planning colleagues are also setting a figure but at a different timescale. Our updated Market Housing Supply Target is based on the draft Housing Audit, and will be updated via the LHS annual updates to ensure that it aligns with our planning colleagues.

Affordability

Affordability of housing is a key concern for many within East Lothian. This is reflected by the Priority Outcome “Housing Supply is accessible, affordable and provides a range of choices to meet the needs of households across East Lothian.” The strategy recognises the steep increases in house prices and the affect that this has on potential homeowners, particularly those would be first time buyers who often must leave the area to obtain more affordable housing. Affordability is not just an issue for homeowners it is also something that many in the private rented sector (where rents have risen steeply) struggle with. We hope that the measures taken in this LHS will improve affordability for East Lothian’s residents and our commitment is reflected in the priority outcome with the aim that “Housing Supply is accessible, affordable and provides a range of choices to meet the needs of households across East Lothian.”

Low Cost Home Ownership

Although it is the preference for many, the strategy covers all tenures and not everyone will want to purchase a home, some will prefer rented accommodation. The LHS contains action 2.5 stating “we will continue to explore options for affordable home ownership and investigate whether schemes such as OMSE and NSSE can be viable within the East Lothian context”. This underlines the Council’s commitment to affordable home ownership for those who wish to purchase a house.

Rural housing

The LHS contains an action to “Explore the Scottish Government’s Rural Housing Fund to see where it could allow for innovative rural developments to take place.” We would welcome your input into ways in which private developers can provide sustainable rural development that enhances our rural areas.

Economy

We recognise the benefits that housebuilding can bring to communities. The strategy recognises that the majority of affordable housing comes from wider market housing developments, without which levels of affordable housing would be much lower. The increase in population in recent years has placed increasing demands on infrastructure and housing and significant inequalities exist within and between communities. It is therefore important too that developers contribute to improve local infrastructure, particularly as new developments increase pressure on already strained services. East Lothian Council recognise the importance of a skilled local workforce which is why the LHS contains an action to “Engage with local colleges, universities and East Lothian Works, in the provision of training and education in sustainable construction.”

Wheelchair Accessible Housing

As noted in your response East Lothian has an aging population, this means that more wheelchair accessible housing will be required. It is important that homeowners also can live in properties that meet their requirements and that developers build housing that reflects this, doing so will enable the needs of an aging population to be better met. As you note earlier in your response the HNDA was signed off as robust and credible and therefore provides a credible source of evidence on which to base the need for wheelchair accessible housing. The strategy team are aware of Scottish Government consultation and shaped the East Lothian Council response to the “Enhancing the accessibility, adaptability and usability of Scotland's homes” consultation. Any outcomes will be noted and used to shape further policy in this area. The aim is for both 5% of market housing and 10% of affordable housing to be wheelchair accessible.

Large Scale Infrastructure

Any decisions on large scale infrastructure are outwith the scope of this LHS.

East Lothian Local Housing Strategy (LHS)
2024-2029

Consultation Response from
East Lothian Partnership and Place Team
*(NHS Lothian Directorate of Public Health and Policy)
and Housing Strategy Team's Response*

(Housing Strategy replied to public health through
comments on the report. These comments are
marked in red)

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Introduction

This response to *East Lothian's Local Housing Strategy 2024-2029* has been produced by the East Lothian Partnership and Place team (EL P&P), which sits within the Directorate of Public Health and Health Policy (NHS Lothian). It should be read together with the paper produced from the multi-agency workshop led by the Partnership and Place team which looked at the potential health impacts of the housing strategy on the population of East Lothian.

It is widely accepted that health outcomes are shaped by a multitude of aspects that go beyond access to quality health care.^{1,2,3} Health is more largely impacted by social, cultural, political, economic, and environmental factors that shape the conditions in which people are born, grow, live, work and age.^{Error! Bookmark not defined.} Homelessness and poor housing conditions have been identified as drivers of health inequalities, meaning that the right to housing is intrinsically linked with the right to health.^{5,1,2} The recent housing strategy for Scotland (Housing to 2040)⁴ recognises the role that good quality housing can play in tackling inequality and advancing equality for those experiencing disadvantage and people with protected characteristics.

For the purposes of this consultation, we have reviewed each priority outcome and associated actions against the headline messages of: *Healthy Housing for Scotland: A Briefing Paper*, which sets out the fundamental link between housing and public health, outlining key 'mechanisms and pathways for how housing can influence health and wellbeing'⁵ and was published to support the implementation of Housing 2040. This has provided a helpful reference point to consider how the LHS reflects and strives to meet the housing needs of the local population.

Further information or clarification on any points can be sought by contacting Philip Conaglen, Public Health Consultant philip.conaglen@nhslothian.scot.nhs.uk or Claire Glen, Strategic Programme Manager claire.glen@nhslothian.scot.nhs.uk.

LHS Vision

The *Local Housing Strategy 2024-2029* outlined the following vision:

'People in East Lothian have access to warm, high quality, affordable homes which meet their needs and enables them to live in communities with the support and services they require.'

EL P&P supports this vision, as it aligns with the key points and conditions that Public Health Scotland highlight as crucial to applying a population health lens to housing policy. According to *Healthy Housing for Scotland: A Briefing Paper*, ensuring that everyone has access to a warm, dry, safe, and affordable home that meets their needs is essential to improving physical health and mental wellbeing, as well as tackling health inequalities that exist within and across communities in Scotland.^{Error! Bookmark not defined.}**Error! Bookmark not defined.**

Strengths of the LHS Draft

1. East Lothian Council appears to have met its legislative duty to consult on the LHS with key stakeholders and the wider community. A range of proactive approaches were used to reach and engage different population groups to capture voices and views that represent the overall population of the county.
2. It is apparent that inequalities across the county, and within each ward, are well understood, which is evidenced by the inclusion of a comprehensive 'East Lothian Profile' and ward profiles. The LHS

identifies the importance of place and the social environment, as well as how the type and condition of housing impacts the health and wellbeing of the population, all of which was clearly considered in the creation of the LHS Action Plan.

3. As a team that values partnership and placed-based approaches, EL P&P appreciates the clear recognition of the benefits and need to adopt improved collaborative working and creative solutions to increasing resources across East Lothian based on local needs and strengths.

General Recommendations for Improvement

1. Meeting the demand for housing, particularly affordable housing, is a challenge. However, EL P&P feels there should be a clearer statement of recognition within the LHS that the current demand for housing in East Lothian is not being met, particularly in relation to social housing (as outlined in the PRS needs assessment conducted in 2022).⁶ While the unmet need is seen in the data, a direct narrative statement highlighting the council's recognition that housing needs are not being met is missing. **Noted and updated.**
2. While the LHS successfully references the achievements of the previous housing strategy, it fails to provide proper benchmarks to assist the reader in understanding how far these actions have gone to meeting unmet need. For example, the LHS 2018-2023 achievements table states (p. 11) that 643 units for social rent were added to the housing market in the five years this strategy was active without referencing the council's target during this period. **We acknowledge this comment, however, have various places where benchmarks are provided in external documents, including the annual LHS update. In the future, we will include hyperlinks to these documents.**
3. Linkages to legislation, policy, and strategy around children and young people is limited throughout the strategy. It would be beneficial to connect housing strategy to other areas of the East Lothian Partnership, including the Local Child Poverty Action Report and UNCRC work. The LHS clearly recognises that housing is one part of a bigger structure. There would be benefit in highlighting how housing ties into other priority areas for community planning. **We have, where possible, accepted these recommendations and added further links to children and young people. However, we would like to note that this is the first LHS to carry out a comprehensive Children's Rights and Wellbeing Impact Assessment.**
4. It is a very comprehensive document with a large number of actions. It would be helpful to number the actions listed at the bottom of each Priority Outcome section rather than using a checkmark shaped bullet. This would make it easier for readers to refer to the subsection which evidences the need for each action. **Noted and updated.**

Feedback by priority outcome

1. Communities are supported to flourish, be distinctive and well connected.

EL P&P supports East Lothian's commitment to creating and maintaining resilient and sustainable communities in which people can access the physical, environmental, and social resources they need.

The connection between housing and health is well encapsulated into the LHS 2024-2029. The first priority outcome strongly highlights how the housing strategy accounts for the external environment (e.g., open spaces, walking/cycling routes, access to community resources, etc.) as well as traditional housing infrastructure. For example, this was noted with the commitment to town centre regeneration and the fostering of '20-minute neighbourhoods,' wherever possible.

Another component of this section was digital inclusion. While EL P&P recognises the value that increased access to digital services, such as the proposed new Housing Management IT System can have, especially for those with mobility barriers. It is important for the council to consider the challenges that arise for those with low digital literacy and connection issues. A Scottish Government report on rural inequalities identified issues with internet access in rural areas of Scotland.⁷ The rurality of East Lothian may leave many disconnected and unable to access the new Housing Management IT system. If services move completely online, this may inhibit segments of the population from having equitable access to crucial housing information and support. **We acknowledge the challenges that may arise from digital connectivity and want to reassure that service will not move completely online as we recognise that this does not serve everyone in the community. We will continue working in partnership with East Lothian Works, the Rural Economy Group and Connected Communities to ensure that we promote and advocate for digital literacy.**

There is strong evidence that place, which is defined as ‘where people, location and resources combine to create a sense of identity and purpose,’ has an important impact on health and wellbeing.^{5,8} Referencing both *Housing to 2040* and the *National Planning Framework 4*, the LHS highlights how placemaking and place-based approaches promote people’s health, happiness, and wellbeing. This strategy makes clear linkages to the six qualities of ‘place’ as defined by NPF4. In addition, Priority Outcome 1 connects strongly to the four of the five *Place and Wellbeing Outcomes* (Spaces, Resources, Civic, and Movement), as established by the Improvement Service.⁹

A major focus of this section of the LHS revolved around the wider external environment beyond brick-and-mortar housing. For example, Section 1.7 emphasised the importance of open spaces in the life of communities and their ability to provide places for reflection, physical activity, sport, and fun. The strategy references the 2018 Open Space Strategy, yet it does not commit to any specific actions to support the maintenance, improvement, and expansion of open spaces in East Lothian. We recommend including an action that directly addresses open spaces in the LHS Action Plan, as the benefits of these spaces to population health and wellbeing are clearly laid out. **The Local Housing Strategy supports the use of open spaces; however it is not within the LHS’ remit to be able to action open space. This sits with the Local Development Plan and the Open Space Strategy.**

2. Housing supply is accessible, affordable and provides a range of choices to meet the needs of households in East Lothian.

As aforementioned, an inadequate supply of housing and poor housing conditions have been identified as drivers of health inequalities.^{5,1,2} As such, EL P&P supports East Lothian’s commitment to providing accessible and affordable housing across a range of housing types to meet the needs of the population. Section 2 of the LHS clearly sets out the national and local context underpinning the 2024-2029 strategy, including reference to the *National Planning Framework 4*, City Region Deal, and *Strategic Housing Investment Plan*. Furthermore, the council has drawn on various sources in conducting a housing needs assessment, such as leveraging the South East Scotland Housing Need and Demand Assessment tool and local council data.

The data shared in the LHS highlights how East Lothian Council is not currently meeting the need for accessible and affordable housing. It does, however, provide an in-depth overview of the many challenges to achieving this in the current political and economic environment. In line with EL P&P and council aims to reduce inequalities, the strategy importantly identifies housing inequalities

both within and across wards, which is crucial to meeting the housing needs of the most disadvantaged populations.

Section 2.4 on Social Rent describes the issue of overcrowding and the detrimental impact this can have on physical and psychological health and wellbeing for people of all ages. Four policies/actions that can work to alleviate overcrowding are highlighted, but apart from the allocation policy (Action 2.2) and increasing mid-market rent properties (Action 2.4), these are not included as part of the Action Plan. It would be beneficial to see commitments to providing incentives for households to downsize, open market acquisitions to increase council stock, and increasing the number of larger social rent properties explicitly outlined in the LHS Action Plan so they are not unintentionally overlooked. **The LHS does not provide an action on incentives to downsize as this is standard policy. Open Market Acquisitions are monitored via the Strategic Housing Investment Plan which is submitted yearly to the Scottish Government. They are also reported on yearly via the LHS Update which will report on all building via the Affordable Housing Programme. Commits to increasing the number of larger social rent properties will be picked up in Affordable Housing Supplementary Planning Guidance.** This section should also reference where the cost of living may increase multigenerational households, therefore contributing to overcrowding. **We welcome this suggestion and have added to the LHS action plan as something we can monitor and assess the extent to which it is happening in East Lothian.** It is common for young people to remain in the family home for longer because of the challenges to buy their own properties and being less able to afford to live alone due to high housing costs. Furthermore, younger people commonly take on carer roles for older people who are unable to live alone due to inadequate housing and support services for this population.

Housing costs constitute one of the largest categories of disposable income expenditure. Those living in poverty often spend a disproportionate percentage of their income on housing than those in higher income brackets, which effectively reduces the amount individuals and families can spend on other health- and wellbeing-promoting factors, such as nutritious food, educational and training opportunities, and leisure time.^{5,10} High housing costs (e.g., rent, mortgage, and fuel costs) combined with the cost-of-living crisis, have increased the number of people struggling with their finances in East Lothian and across Scotland. Living in poverty is linked to poorer health status and early death, so it follows that the affordability of housing is a key driver of health inequalities.

Section 2.8 describes how the private rented sector (PRS) makes an important contribution to housing in East Lothian. Across wards, PRS housing makes up 11 to 28% of total registered properties.⁶ Despite this, over 50% of households in each ward, except for in Dunbar & East Linton (40%), cannot afford the PRS if they conform with standard financial guidance to cap housing costs at 30% of total disposable income. The PRS is increasingly becoming more unaffordable, particularly for those at lower SIMD quintiles. In recognition of this, the LHS states the council could provide support and advice to PRS tenants, such as through income maximisation, but this is not explicitly included in the LHS Action Plan. Where PRS options are reduced there are concerns about the impact on homelessness in East Lothian and people unable to move from temporary accommodation.

3. Homelessness is prevented as far as possible, and where unavoidable a rapid response with appropriate support is provided.

EL P&P recognises the links between homelessness and poor health outcomes and the importance of adequate and quality housing in reducing health inequalities. We fully understand the socio-economic impact on people and the tension between providing appropriate accommodation that meets peoples needs and the existing and growing pressures within the housing system which increases the risk of homelessness across the county.

Action 3.1 is key as we know that women experience inequalities disproportionately. The Scottish Women's Budget Group (SWBG) have worked with Women and Girls in East Lothian to use gender budgeting tools to look at how the current cost of living crisis is impacting women and girls in the local area and how gender blind approaches to decision making are impacting disproportionately on women and girls. The current cost-of-living crisis does not impact everyone equally. Issues such as austerity, wage stagnation, rising inflation, and the impact of the Covid-19 pandemic, all impact women due to pre-existing structural inequalities. Rising costs have hit individuals on the lowest incomes the hardest. This disproportionately impacts women as they are more likely to experience poverty throughout their lifetime with lower levels of savings and wealth in comparison to men as well as being unable to increase paid work due to caring responsibilities.

Action 3.2 would benefit by incorporating some financial literacy and budgeting advice. **This is not something that the LHS would monitor, it will be picked up within the R RTP and through a Tenancy Support Officers workload.** This would support the prevention of homelessness agenda as well as the wider poverty agenda. There are opportunities to develop and deliver this in partnership with other agencies linked to the East Lothian Financial Inclusion Network. Learning from previous course evaluations would helpfully inform this work too if available.

The introduction of the Prevention of Homelessness Duty will strengthen preventative action and will require strong leadership, collaborative and innovative approaches. Although it will take some time to embed, this approach will help to identify people at an earlier stage and ensure fewer people end up in crisis. Collaborative working is key. The pressures are acknowledged with the increasing homeless applications yet there have been successes that can be learned from the substance use field who had to implement the Scottish Government medication assisted treatment standards. Similarly, this meant an increase in complex cases accessing already pressurised services. A quality improvement approach was used to map pathways and identify areas for improvement.

Section 3.6 and the actions 3.3, 3.4 and 3.5 would benefit from being informed by local data, both quantitative and experiential data. This is key to better understand the needs from people who have experience of being homeless, what the triggers were and their experience of current pathways. Input from professionals and volunteers who work with the different groups is also key. Early identification before it gets to crisis point also fits with anticipatory care type pathways that were developed for people at high risk of drug harm. Public health can provide examples of how this worked. This also links to 3.7 where having wider partnerships trained to recognise and ask about housing and homelessness situations will help to ensure people are identified and appropriate support can be provided. This should be wider than just council staff. **We agree that it should be wider than just the Council, the Prevention Duties will apply to all public bodies including Police, Health and Social Care Partnerships and GPs.**

Section 3.8 gives good background on the demographics of people who are applying as homeless, and it is no coincidence that these are often the same groups at higher risk of poor health. It would be helpful to explore the data further and breakdown to determine how the homeless presentations relate to the priority family groups linked to child poverty.

The LHS does not state whether there is targeted prevention is focused on the groups at higher risk of homelessness and if work is being done to mitigate the common reasons people are presenting as homeless. Targeted prevention is focused on higher risks groups and is mentioned in the LHS. This includes those in prison through SHORE. This was reflected in Suitable Housing & Support Chapter. More detail will be available in the upcoming refresh of the RRTP. Similarly, although the strategy highlights the impact of COVID-19, the cost-of-living crisis and improved recording of homelessness and rough sleeping, it is unclear what actions will be taken to mitigate these impacts, particularly regarding the substantial increase in the number of rough sleepers. This will be picked up in the updated RRTP where necessary. This may be part of the plan once the homelessness prevention duty is in place.

The LHS provides helpful background on children and young people and their right to an adequate standard of housing conditions as a contributing factor to getting the best start in life. Action 3.6 mentions the wellbeing of children. Given there is still a considerable number of children living in temporary accommodation, EL P&P supports the need for action to reduce health inequalities for children and young people. It would be beneficial to see more collaborative working between housing and education, the Children's Strategic Partnership, and the Poverty Action group to create an environment in which children can thrive. We welcome this suggestion and have added it to the LHS as a key action within chapter 4.

Action 3.6 is helpful in response to the use of emergency and temporary accommodation, but a trauma informed approach should underpin all of the LHS work, not just in relation to children and domestic abuse. We agree that a trauma informed approach should underpin all of the LHS work, it is a guiding principle of the LHS. However, we wanted to highlight its importance within this specific action.

Housing First and the STRENGTH model provides useful evidence and learning that more intensive working with some of the most vulnerable groups can in the long term prevent homelessness and reduce costs across wider services. Is there a fit with wider services where a partnership approach to funding might be beneficial? Should Housing First, in its most accurate form, be implemented in East Lothian it would require significant multi-agency input, buy-in and funding. It would also require necessary changes within the housing allocations policy. At present there is such a shortage of social housing in East Lothian it is not viable to move an individual directly into a permanent tenancy that meets their needs when they become homeless.

4. Suitable housing support services are effective, accessible to, and will meet the needs of those most vulnerable in the community.

EL P&P supports East Lothian developing a variety of services and housing types to meet the needs of a diverse population. As the LHS outlined, housing is a critical enabler to promoting health and wellbeing. The actions laid out in Section 4 aim to reduce inequalities in relation to groups in deemed as vulnerable based on protected characteristics. This is in direct alignment with EL P&P, NHS Lothian Public Health, and East Lothian Council priorities.^{11,12}

The impact that housing has on health and wellbeing is not equal across all segments of the population. Communities that have historically and systemically been marginalised and excluded are disproportionately impacted.⁵ It is thus necessary for housing strategy and policy to be

examined using an intersectional lens. Intersectionality refers to how various aspects of identity intersect and overlap to influence how individuals and communities experience, and are treated, on interpersonal and systemic levels.¹³

Section 4.3 outlines the unique housing needs of children and young people belonging to vulnerable groups. It would be worthwhile to also refer to the general link between housing and health for all children, particularly considering local and national efforts to integrate UNCRC rights into legislation, policy, and service delivery. For example, high or rising housing costs can push families into poverty, which then impacts access to other basic activities and health-promoting opportunities for children and young people, such as nutritious foods and play. Furthermore, housing quality also has an impact on children's health. For example, cold, damp housing is associated with a higher prevalence of respiratory conditions, such as asthma. Although mentioned in section 5, EL P&P recommends that the LHS expands on these general impacts. This would not necessarily require additional actions, as aspects of the existing action plan would positively impact children and young people. **We welcome this suggestion and have expanded it within the LHS.**

The strategy highlights *My Place*, an innovative approach to housing care-experienced young people in flat shares rather than in independent tenancies. Upon leaving care, care-experienced young people are frequently housed independently, even though young people often do not feel ready to live alone and despite flat sharing being a normal experience for those in this age group that are not care-experienced. Action 1.1 calls for reviewing supported accommodation for young people and developing options to meet housing and support gaps, but the plan does not comment on if/how the council can replicate the *My Place* model to better meet the needs of care-experienced young people. **The My Place/ flat-share model of housing is included in the overall review of accommodation for young people experiencing homelessness.**

The LHS also discussed the specific housing needs of older people. Unaffordable housing is an influencing factor behind the ongoing staff shortages in health and social care. These shortages have a negative impact on older people as a lack of home-based care reduces people's ability to stay in their homes rather than enter supported accommodation. The council should consider what actions the LHS could commit to around the provision of affordable homes for these staff groups. This would help older people stay at home longer, provide employment opportunities, and improve housing options for local people, all of which align with the East Lothian Council Plan priorities.¹¹ Additionally, it would be beneficial to reference the new strategy being developed for the provision of services for older people since part of this plan is to improve intermediate care and care at home, which will have significant impacts on housing. **We agree with this suggestion and were aware that we were missing around an action to define 'key workers' in East Lothian and prepare a subsequent needs assessment. This has now been added to the LHS.** Inadequate housing is currently one of the major barriers to this form of care. Relatedly, it would be beneficial to lay out the existing availability of adapted accommodation compared to need. **Adapted housing across all tenures is difficult to keep data on due to the changes which can easily be made without a landlord or owner monitoring it and reporting it to a central database. What has been provided in the LHS is the need for wheelchair housing and the need for adaptations.**

In Section 4.13, the LHS acknowledges that East Lothian has limited data on race and ethnicity. EL P&P encourages the council to commit to using 2021 census results to better understand how race and ethnicity impact housing and health inequalities to ensure we are not unintentionally ignoring

the needs of populations who have historically and systematically been marginalised. **We welcome this suggestion and added it as an additional action within the LHS.**

5. All homes are *updated and* maintained to a high standard, are energy efficient and contribute to meeting East Lothian's climate change targets.

Section 5 acknowledges that the impact of climate change is often felt worst by those who are most vulnerable. This echoes evidence that some people and communities are more likely to be exposed to, vulnerable to, and less able to respond and recover from, climate impacts.¹⁴ Extreme temperature changes and flooding are well outlined in the strategy along with the communities that are most likely to be affected.

Geography and concentrations of deprivation in the west of the county are identified as important factors, but it is also key to consider individual factors, like age, gender, and existing health problems, which may increase the likelihood of health-related climate impacts. For some, the inequality is multi-dimensional, meaning that some individuals will have less ability to cope and recover. The risk of flooding for coastal towns and rising sea levels could impact significantly on people's mental health. This will likely present the greatest burden in areas where people's homes are at risk or are damaged/lost completely to floods.

Action 5.1 is essential to prevent and mitigate against climate change and ensure any action taken is proportionate to need for different populations.

The LHS recognises that strategies to upgrade homes often rely on homeowners' own initiative, which is, in turn, reliant on their understanding of, and engagement with the climate change agenda as well as having an ability to act. Climate change must be presented in a way that is set in context for all residents of East Lothian. This change would support engagement and improve understanding of how climate change will impact residents and how adapting homes to be more sustainable will benefit them in the long term. Where homes must be adapted consideration should also be given to how the benefits are shared widely and that any costs associated with actions against climate change do not unfairly burden those least able to pay.

The LHS presents the housing related contributors to fuel poverty and those most likely to experience it. EL P&P agree that local intelligence and data sets are key to addressing fuel poverty, and therefore Action 5.2 is essential to monitor and understand the needs of the population. According to the UK Fuel Poverty Monitor, households using prepayment meters are at acute risk due to self-disconnection.¹⁵Error! Bookmark not defined. As there is no reference to housing with pre-payment meters in the LHS, it would be helpful to understand how many properties across the area have these and what actions can be taken to mitigate the risks for these households. **The number of pre-payment meters in East Lothian is very difficult to quantify as they are put in by an energy provider and are not reported on centrally. Pre-payment meters are not installed as standard in Council tenancies.**

EL P&P supports the statement that 'the transition to net zero must be just, with no adverse impact upon the most vulnerable communities.' This will help to ensure that the inequalities gap is not widened, and that people have equitable access to support and home improvements. As stated in Action 5.3, the move towards net zero will provide education, training, and employment opportunities for residents which will link into the community wealth building agenda, improve the

local economy, and contribute to a sustainable and inclusive economy. If done equitably, all these actions have the potential to lift some families out of poverty. Under Action 5.4, an integrated impact assessment of the energy efficiency policy should be completed to help to identify the positive and negative impacts of the transition to net zero and ensure that no groups are impacted disproportionately. **We agree, as standard an integrated impact assessment is carried out on all housing policies.**

Evidence shows that while the cost of poor housing to the NHS varies depending on different situations. Health risks and treatment provision could likely be reduced if improvements to housing are made.⁵ For example, improving the energy efficiency of homes and removing health hazards, could thereby prevent poor physical and mental health, reduce fuel poverty, reduce mortality, and reduce inequalities, particularly amongst low income groups, such as older adults and people living with existing health conditions or disabilities.

The LHS identifies key risks to health, including condensation, dampness, dwellings that fall below a tolerable standard requiring repair, and poor social housing quality. Further detail of how these risks can be addressed and what supports are provided for vulnerable households facing these challenges should be included in the strategy. Especially since we know that these properties are more likely to be occupied by more vulnerable individuals or priority family groups (as outlined in the child poverty strategy). Where children experience poor housing conditions, evidence shows that this carries health risks into adulthood and poor standards of housing have negative effects right across the life course. **We agree that further detail is needed on how the risks can be addressed and what supports are to be provided for vulnerable households. The LHS notes a recently formed Damp and Mould Group led by East Lothian Council to explore proactive measures. Once this groups findings are report, the LHS will be updated to reflect any additional support or mitigations being put in place.**

EL P&P acknowledge the acute financial pressures and tensions that exist with the cost of bringing properties up to standard and therefore supports looking at maximising opportunities to provide collaborative approaches to improvements and conditions (Action 5.9). This approach fits well with the East Lothian Community Wealth Building agenda, specifically around the pillars of local procurement and employment. Upgrades to prepare homes for climate change impacts and for those in disrepair could also provide numerous training and employment opportunities within local businesses and trades (which links to Action 5.3).

More detail of the Passivhaus standard and what the implications might be for East Lothian are needed in the LHS, such as the impact on affordability and the benefits that the standard will bring in relation to energy efficiency impacts on health and inequalities. **We agree that the Passivhaus standard will have implications for the LHS, not least in the delivery of affordable housing. However, this will be explored in greater detail in the Local Heat and Energy Efficiency Strategy. It may also be covered in the yearly update on the LHS when EESSH2 is published by the Scottish Government.**

Additionally, since the PRS is important due to low stock of social housing, Action 5.11 should support and maintain positive relationships with PRS landlords to prevent or identify issues earlier, as well as help to mitigate any negative impacts for tenants. **This is picked up via 5.12 regarding landlord engagement. While the Private Sector Housing Officer will cover some private rented**

sector landlord engagement, their primary duty will be on delivering the Scheme of Assistance and the Below Tolerable Standards Policy in both the owner-occupied and private rented sectors.

In summary

Overall, the LHS is structured well and sets out a comprehensive approach to addressing housing challenges in East Lothian. It has made a strong start to identify issues that relate to inequality and how changes to the housing system might address them within current practical and financial limitations. The EL P&P team are happy to work strategically to support the collaborative approaches outlined in the feedback.

Additional Comments & Questions

This section contains questions and comments around the terms and language used, as well as suggestions for simple content/context additions.

Section	Page(s)	Comment
Introduction, Key Principles	5	The Health and Wellbeing section should be updated to reflect that the workshop on the draft LHS was conducted. Additionally, we recommend adding the following line: 'EL P&P Public Health colleagues will facilitate another workshop with key stakeholders to explore the potential impacts the LHS may have on population health.' Amended and updated.
Introduction, Engagement & Consultation	9	The term 'lived experience' is used in the table without sufficient context. Lived experience of what? Poverty? Homelessness? Noted and updated.
Introduction, Governance	9	The acronym RSL is used without explanation. The full term should be used with (RSL) following it as this is the first time the term appears in the strategy. Noted and updated.
Strategic & Policy Context	12-14	Should the human rights bill be added here? It is set to pass soon and includes within it the right to adequate housing. We have taken the decision to not include the Human Rights Bill, as although it will be important, the Bill is still in very early stages of development and is unlikely to be passed into legislation before the end of the LHS.
Strategic & Policy Context	15	Should the East Lothian Dementia Strategy 2023-2028 and the forthcoming Youth Vision and plans for older people's service provision be added to the table? Noted and updated within the Suitable Housing & Support Chapter. Any linkages to the Youth Vision will be added to the LHS once it is published via LHS Annual Updates.
East Lothian Profile, Geographic Profile	17	Why were area partnerships not updated to reflect the ward changes in 2011? This adds avoidable complexity to strategic planning and resource distribution. A Corporate decision was made by East Lothian Council not to update the area partnerships to reflect the ward changes in 2011.
East Lothian Profile, Population Demographics	18-19	It would be helpful to include a caveat to the NRS data to highlight how the current projections do not include the new housing developments in East Lothian (e.g., Blindwells). It is widely accepted that NRS population projections are simply projections and not accurate measures. However, while NRS population projections may not take into account housing development coming forward, planning and housing authorities both use NRS projections and estimates when planning for new housing and development. Population data is the starting point for estimating housing need – rather than housing being the starting point for estimating population.
East Lothian Profile, Population Demographics	19	Providing a comparison of life expectancy in East Lothian versus Scotland is useful, but the higher life expectancy does mask inequalities, as some areas within East Lothian have significantly lower life expectancy. It would be worth including one sentence to acknowledge these discrepancies. Noted and amended.
East Lothian Profile,	21	In the first bullet, 'considerable' should be used in place of 'considerate.' Noted and amended.

Economic Profile		
East Lothian Profile, Economic Profile	21-25	<p>The upcoming council tax freeze will impact council funding which will have a knock-on effect on housing. It would be worth mentioning how the council tax freeze may impact housing and the ability of the council to follow through on the LHS Action Plan.</p> <p>The upcoming council tax freeze is most likely to have a knock-on effect on the services which are provided by the Council rather than anything directly funded for Housing. This is funded through the Housing Revenue Account. It is more likely that decisions on the rent review will have a larger impact on the LHS Action Plan. Any impact will be monitored and reported on annually via the LHS Action Plan Updates.</p>
1.4 Community Engagement	32	<p>‘Change Collective’ should be ‘Working for Change Collective.’ – Noted and amended.</p> <p>To note that WFCC is still in the very early stages of development and only has two volunteers. EL P&P also is under the impression that the group has not been consulted on potential involvement regarding housing, which should be done if they are to be mentioned in the LHS.</p> <p>...Or does ‘Change Collective’ refer to all the VCEL work streams that they are leading on?</p>
1.5 Communities of East Lothian	38	<p>The LHS says that Musselburgh (18,826) is the most populated area partnership, but other area partnerships have a larger population (e.g., Haddington & Lammermuir, 20,079). Was this point supposed to say most <i>densely</i> populated?</p> <p>Noted and amended.</p>
2.3 Affordable Housing	49	<p>You may need to double-check some data. Table 2.1 states that 995 affordable houses were delivered between 2018-2023, but Action 2.1 (p.129) states this number was >1000.</p> <p>Table 2.1 refers to the number of affordable homes delivered between 2018-2023 and Action 2.1 is referring to the number of affordable homes that will be delivered between 2024-29.</p>
2.11 Empty Properties...	63	<p>It would be useful for Action 2.8 to reference the council tax freeze.</p> <p>Noted and amended.</p>
3.5	79	<p>Section numbers are incorrect from this page. Section 3.5 is repeated here and then followed by further incorrect section numbers.</p> <p>Noted and amended.</p>
5. Suitable Housing and Support	68-87	<p>The gypsy traveller community is often hard to reach and can often be worst affected by health inequalities^{xvi}. While the closing of the travelling site in East/Mid Lothian was mentioned in Section 4, it also has key impacts in terms of homelessness. How will this group continued to be supported after the closure and what actions will be taken to further support the traveller community going forward.</p> <p>The site is currently closed due to the level of disrepair on the site. No decision has been taken forward not to reopen at the site. All the previous tenants of the site had vacated prior to the closure of the site. An action has been added to the LHS to conduct a needs assessment alongside Midlothian Council to determine whether a Gypsy/Traveller Site is needed in East and</p>

		Mid Lothian Council areas. This will also pick up any further support required by the community going forward.
3.7 Supported Accommodation	83-84	The last paragraph of p. 83 is repeated as the first paragraph on p. 84. Noted and amended.
5.9 Moving forward	125-126	The list of actions does not include the one that relates to action 5.2 about data collection over the course of the LHS. Noted and amended.

References

¹ Jo Bibby and Natalie Lovell, "What makes us healthy? An introduction to the social determinants of health" (Quick guide, Health Foundation, 2018), www.health.org.uk/publications/what-makes-us-healthy

² "Social Determinants of Health," World Health Organisations, accessed November 27, 2023, https://www.who.int/health-topics/social-determinants-of-health#tab=tab_1

³ Jo Bibby, "Health care only accounts for 10% of a population's health," (Blog, Health Foundation, 2017), <https://www.health.org.uk/blogs/health-care-only-accounts-for-10-of-a-population%E2%80%99s-health>

⁴ Scottish Government, Housing to 2040, <https://www.gov.scot/publications/housing-2040>

⁵ Public Health Scotland. *Healthy Housing for Scotland: A Briefing Paper Setting out the Fundamental Link Between Housing and Public Health* (Edinburgh, Public Health Scotland, 2023), <https://publichealthscotland.scot/publications/healthy-housing-for-scotland/>

⁶ Research into the Private Rented Sector in East Lothian: Final Report.

⁷ Scottish Government, "Rural Scotland Key Facts 2021" (Report, Scottish Government, 2021). <https://www.gov.scot/publications/rural-scotland-key-facts-2021/>

⁸ Scottish Government, “Place Principle: Introduction” (Factsheet, Scottish Government, 2019)

<https://www.gov.scot/publications/place-principle-introduction/>

⁹ Improvement Service, “Place and Wellbeing Outcomes” (Briefing, iHub, 2022).

https://www.improvementservice.org.uk/_data/assets/pdf_file/0020/30719/PWO-briefing-paper.pdf

¹⁰ Scottish Government, “The Cost of Living Crisis in Scotland: An Analytical Report” (Social Research Series, Scottish Government, 2022), <https://www.gov.scot/publications/cost-living-crisis-scotland-analytical-report/documents/>

¹¹ East Lothian Council Plan 2022 to 2027

¹² Philip Conaglen, Katie Dee, Martin Higgins, Dona Milne & Ross Whitehead, “Director of Public Health Annual Report,” (EL P&P, 2022), <https://services.nhslothian.scot/publichealth/annualreport/>

¹³ Kimberlé Crenshaw, *On Intersectionality: Essential Writings*, (New York: The New Press, 2017).

¹⁴ Public Health Scotland, “PHS climate change and sustainability strategic approach 2023–2026,” (Report, PHS, 2023), <https://publichealthscotland.scot/publications/phs-climate-change-and-sustainability-strategic-plan/>

¹⁵ World Health Organization. Housing and health guideline. Geneva: World Health Organization; 2018. <http://apps.who.int/iris/bitstream/handle/10665/276001/9789241550376-eng.pdf>

^{xvi} [Tackling inequalities faced by Gypsy, Roma and Traveller communities - Women and Equalities Committee \(parliament.uk\)](#) (UK Government, 2019)