

Background Paper - General Housing Issues

Issue No 013

Context: NPF Spatial Strategy, NPF 4 Policy 16 Quality Homes, Policy 17 Rural Homes

This section deals with all housing matters with the exception of the setting of the Housing Land Requirement. All area or site-specific discussions on housing are dealt with under the spatial strategy or area partnership sections.

LINKS TO EVIDENCE

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| ELC 019 | ELC Statistics (ONS 2023) East Lothian (S12000010) - ONS |
| ELC 048 | HNDA3 (produced by ELC and other SE Scotland LAs) SES Regional Planning — The Edinburgh and South East Scotland City Region Deal (esescityregiondeal.org.uk) |
| ELC 091 | Local Housing Strategy (East Lothian Council 2024) Approved Local Housing Strategy (LHS) 2024-2029 East Lothian Council |
| ELC 366 | Strategic Housing Investment Plan (East Lothian Council 2023) Strategic Housing Investment Plan (SHIP) Strategic Housing Investment Plan East Lothian Council |
| ELC 046 | Housing 2040 (Scottish Government 2020) Housing to 2040 - gov.scot (www.gov.scot) |
| ELC 373 | Future Housing needs of older people (ELC 2022) |
| ELC 374 | Rural Housing Survey Analysis (ELC 2022) |
| ELC 375 | Older People Needs Assessment |
| ELC 376 | Young person's online engagement report (ELC 2022) |
| ELC 377 | Self-Build Housing Register (ELC) East Lothian Self-build Register 2024 East Lothian Council |
| ELC 365 | Existing Housing need in East Lothian (Homes for Scotland) |
| ELC 380 | Wheelchair Accessible Housing Assessment (ELC 2021) |
| ELC 383 | Local Housing Strategy 2023-28 – Engagement and Consultation Plan |
| ELC 381 | LHS Early Engagement Survey Report |

Views received on housing through summer engagement. (ELC 2023) Available in Evidence Report and in this Background Paper.

SUMMARY OF EVIDENCE

Housing Context

East Lothian has experienced, and will continue to, high population growth. This has been fuelled by recent Spatial Planning strategies and the general desirability of the area. The 2022 Census shows that East Lothian has had by far the biggest rise in population of any local authority area in Scotland from 2001 to 2022 – 24.6%, over three times higher than the % increase in Scottish population of 7.4%. Much of this change has been fuelled by in migration, brought about by unprecedented levels of housing growth, required by the dispersed housing strategy of SESplan 1.

Sites for over 16,000 houses were included in the LDP. This strategy has been successful in that over 90% of the sites allocated have planning permission and around half have been built.

East Lothian will face a high population increase, particularly in terms of people aged 65+. This will create greater demand for accessible and adaptable housing. Adaptation payment request by recipient show that older people account for a higher percentage of adaptations than 'disabled adult' (58.6% to 41.4%).

Housing needs of the population in the Area.

Along with the other former SESplan authorities, East Lothian carried out a HNDA exercise which concluded in 2022. The preferred scenario (steady growth) in HNDA3 shows a need and demand for 476 houses per annum. 2/3 of the need and demand figures in the Council area is for affordable housing.

Housing needs of those undertaking higher education

Queen Margaret university is currently undertaking a study, along with the other Lothian and Borders Universities to determine the need for those in further education. This study has not yet concluded but will be available for the production of the Proposed Plan. This has been identified as a gap in information.

Housing needs of older people

Surveys of older people show a range of views on their needs, with the needs for adaptable housing and options for downsizing high on the list.

Housing needs of disabled people

Affordable Housing provision currently delivers these requirements based on the needs of those on the list. At the moment, there is not a process in place which lets the Council encourage private developers to build these homes. Having a mix of accessible affordable and private homes will help make sure there enough options to meet these needs.

Affordable Housing

There is strong need for affordable housing in East Lothian. Affordable housing need makes up around 2/3rds of the HNDA total for East Lothian.

East Lothian has a successful track record in delivering affordable housing. As with most Councils the level delivered is dependent on government funding. The Council is developing its LHS alongside the LDP and it has an

ambitious programme of affordable housing delivery which unfortunately has been reduced recently due to a scaling back of national funding.

Availability of land in the district for housing

The 2023 Housing Land Audit shows that there is land for around 8,000 houses remaining in the land supply.

Availability of land for older and disabled people

Land is not identified specifically for these needs in the LDP but it is factored into the delivery of affordable housing. Moving to the Proposed Plan the LDP will look to bring in a requirement for disabled persons housing and adaptable housing into affordable and private housing.

Self-Build Housing

The Council has a register of those looking for land to self-build housing. There is a lack of self-build sites at present and this will be rectified through the development of settlement strategies in the Proposed Plan.

Adaptation of housing for older and disabled people

A survey was carried out on this subject to support the requirements of the LHS and the Planning Act Section 16B (3)(b)(i) *'actions taken by the planning authority to support and promote the construction and adaptation of housing.....'*

Wheelchair and Specialist Need

1.5% or 1,630 individuals in East Lothian's in 2021 were in receipt of an NHS Wheelchair. The Musselburgh area has the highest % of wheelchair users and Haddington the lowest.

19% (or 8,000) of all households in East Lothian report having adaptations for disabled occupants. However, 1% (or 1,000) of all households in East Lothian reported needing adaptations for disabled occupants.

There is estimated to be 430 who require wheelchair accessible homes in East Lothian which is unmet. There is a higher demand for properties in Musselburgh, Prestonpans, Haddington and Tranent for Social Care Clients.

To meet the demand of general needs housing, 20 wheelchair accessible homes should also be built. Using the HND A3 Housing Supply Target, this accounts for 10% of affordable housing per year.

It is recommended in the LHS that 5% of all future private homes are built to wheelchair accessible standards. Within this there should be a 60:40 split between smaller 2 bed properties and 3-4 family homes. Using current supply numbers, this would translate to around 17 wheelchair accessible homes built per annum with 10 smaller properties, and 7 family-sized homes per annum. This target should be reviewed annually.

Land for Gypsy/Travellers and Travelling Showpeople

There are no such sites in East Lothian and no representative groups for the area. The joint site with Midlothian Council closed and there is no evidence of demand for it or another site to open. The Council has tried many avenues to gather information on demand and the results of this engagement are summarised as an Appendix to this background paper. This engagement will continue to be pursued alongside the Proposed Plan.

Short term lets

The last few years has seen an increase in the number of short term lets particularly in the East of the County. Concerns have been raised in communities about their impact on the character and amenity of some town centres. Studies to date have been inconclusive on the number of short term lets. A licencing scheme is currently

being introduced for short term lets and once this has concluded a more accurate view of their numbers and concentration will be available and policy will be developed.

Second Homes

Many of the towns in the East of the County are popular tourist destinations which also encourages second homes. There is little planning can do to address any issues this brings. National policy may have an impact on the prevalence of second homes through increases in Council Tax.

Rural Housing Analysis

East Lothian only contains pressured rural areas and there is no need to resettle the countryside due to decline. Surveys show that there is a need for small scale affordable housing in rural areas and a perception that rural areas are overlooked when housing decisions are made.

SUMMARY OF STAKEHOLDER CONSULTATION

As well as public wide consultation and general consultation information was also gathered from surveys with young people (of various ages), disabled groups, gypsy travellers and general consultation with key agencies, Homes for Scotland and other developers and the public.

Responses focused on the following issues:

The desirability of having additional housing allocations (both for and against), the level of new housing and the perceived lack of affordable and special needs housing. Design, associate services such as health and openspace, type of housing, over provision or large detached housing and a need for smaller sites in rural communities.

While most responses understood the need for new housing many thought that the new housing design and layout needed to improve, along with an improvement to local services.

Recognition of the changing demographic in the population was highlighted along with the need for housing to be more adaptable to cater for those with specialist needs.

Short term lets and second homes were raised as an issue, particularly in the East of the County in towns such as Dunbar and North Berwick.

WHAT THIS MEANS FOR THE PROPOSED PLAN? WHAT ARE THE KEY ISSUES FOR THE LDP TO ADDRESS, FROM POLICY ANALYSIS?

Affordability is an issue in the County as is the need for affordable housing. We will work with our housing colleagues to ensure that affordable contributions are gathered on all sites and assess whether there is a need to raise the affordable housing percentage above 25% in certain locations.

We currently have a list of those interested in self-build housing but no available land. The LDP will need to consider how best to achieve a self-build land supply through policy or allocation. Identification of land for self-build housing.

We will use Local Development Plan 2 to make sure that 5% of new private homes built are wheelchair accessible homes. This is a target that has already been set through our Local Housing Strategy.

With proportionately more elderly people in East Lothian we will look to require the delivery of smaller houses to allow for downsizing and also adaptable housing which can address the specialist needs of the population. The provision of smaller homes and flats can also help address the wider housing affordability issue the County is facing.

The last strategy primarily focussed on larger sites in the main settlements. To complement the remainder of LDP1 strategy it may be appropriate to consider the identification of some smaller site especially to address rural affordable need.

Alongside our housing colleagues we will pursue continued efforts to ascertain any need for gypsy and traveller sites.

Short term let controls and policy will be considered once the licencing scheme is implemented.

AREAS WHERE THERE IS AGREEMENT OR DISPUTE ON ISSUES AND POSSIBLE APPROACHES.

There are no disputes. Any changes to affordable housing levels, controls over short term lets or other requirements are policy decisions and outwith the scope of the Gatecheck.

There is agreement on the following:

- I. The need for new housing to be accompanied by appropriate levels of services.
- II. New Housing to reflect the character of East Lothian and not be 'standard'.
- III. A need to provide more housing for specialist needs such as the elderly and disabled.
- IV. The need to provide sufficient affordable housing.
- V. A desire to consider smaller scale sites, possibly in rural areas that could provide new housing opportunities in smaller communities and sustain local services.

All these issues will be addressed in the Proposed Plan.

Short terms lets is a very contentious issue but the need for control areas is being considered through a separate process and is not covered by this Evidence Report. The conclusions of this exercise will be reflected in the Proposed Plan.

LINKS TO EVIDENCE; Why it is intended for use in the development of the LDP.

Population trends (ONS 2023)

This information is produced nationally and gives data by local authority on the scale of population change. The information allows a national view to be taken on these areas of decline and development pressure and ensure the best use of Scotland's natural and physical infrastructure. It has been used to guide the LDP2 Housing Land Requirement and will be used to develop the Spatial Strategy in the Proposed Plan.

HNDA3 (produced by ELC and other SE Scotland LAs)

This HNDA exercise was carried out in 2021 with the other 5 South East Scotland Local Authorities. It was produced using the national HNDA methodology and confirmed to be robust and credible by the Centre of Housing Market Analysis (CHMA). It provides a reliable indication of need and demand over the East Lothian area to help in the production of the Housing Land Requirement and the Housing Supply targets and strategy in the Councils Local Housing Strategy (LHS) and its Strategic Housing Land Review (SHIP). It also covers off most of the requirement through the Section 15(5) of the Planning Act to 'identify the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people,'.

Housing 2040 (Scottish Government 2020)

As a National Strategy this must be reflected in the development of the LDP, LHS and SHIP. This document is referred to in the Local Development Plan Guidance (P 62) as a relevant source of information and will be used as context for the development of the LDP Housing Land Requirement.

Local Housing Strategy (East Lothian Council 2023), Strategic Housing Investment Plan (East Lothian Council 2023)

As a local authority, East Lothian Council has a legislative requirement to routinely produce a Local Housing Strategy (LHS), which outlines, over a 5 year period, how best to improve housing and its related services, specific to the challenges faced in the county.

This information will be used during the preparation of the Proposed Plan to identify the level of additional sites that require to be allocated. Use of this information cover the requirements of the Planning Act in Section 15(5) which cover the 'availability of land in the district for housing.....'

Future Housing needs of older people (ELC 2022)

This survey was designed to understand the key challenges which are faced older people living within East Lothian, specifically the future housing needs of older people within the region. The survey was not age restricted and was designed to take into account the views of younger age groups in order to ascertain their views in regard to their likely future housing needs as they age. This survey was carried out to support the requirements of the LHS and the Planning Act Section 16B (3)(b)(i) 'actions taken by the planning authority to support and promote the construction and adaptation of housing needs of older people and disabled people in the authority's area,.....'

Rural Housing Survey Analysis (ELC 2022)

Covers requirements of Section 15(5) of the 2019 Planning Act which looks to check the desirability of allocating land for the purposes of resettlement and whether there is rural decline. Also considers the housing needs of rural areas including affordable provision.

Young person's online engagement report (ELC 2022)

This survey was carried out alongside the early preparation of the LDP and the LHS to address the requirements on the Evidence Report to consider the needs of the '*persons undertaking further and higher education...*' (Section 15(5) of the Planning Act)

Self-Build Housing list (ELC)

As required the Council has for some time kept a list of those interested in self-build housing. This is publicly available on the Council website. It has recently set up a formal register where interest can be recorded.

Wheelchair Accessible Housing Assessment (ELC)

In March 2019, the Scottish Government brought in a requirement for all local authorities to provide wheelchair accessible housing targets across all tenures and report annually on progress. The commitment came from the Scottish Government's Fairer Scotland for Disabled People Delivery Plan. This Assessment addresses this issue.

Research aimed at addressing needs of Gypsy/Traveller and Showpeople

This work is aimed at addressing section 16 B (3) of the 2019 Planning Act which requires Evidence Reports to set out— *(i) a summary of the action taken by the planning authority to meet the accommodation needs of Gypsies and Travellers in the authority's area.*

EVIDENCE

Population Change and Housing Delivery in East Lothian

The 2022 Census shows that East Lothian has had by far the biggest rise in population of any local authority area in Scotland from 2001 to 2022 – 24.6%. The next highest increase was 19.3% in Midlothian. Our % increase in population over these 21 years was over three times higher than the % increase in Scottish population, 7.4%.

Scotland's Census 2022 estimated the number of households (with at least one usual resident) in East Lothian to be 48,800; an increase of 5,900 (13.7%) from Census 2011

Together Edinburgh, South Lanarkshire, Fife, Highland, Aberdeen City, Aberdeenshire, and Perth & Kinross accounted for almost half (49%) of Scotland's new housing supply. New dwelling completions in East Lothian are close to many of these authorities and sit within the top ten authorities in terms of housing completions in 2020-21. The new LDP must take into account the trends and projections that are affecting East Central Scotland and wider Scottish society.

These trends and projections feed into other studies such as the Housing Needs and Demand Study which is discussed further in the Housing Land Requirement background paper and Evidence Report.

National projections show that East Lothian is projected to have the 2nd highest percentage change in population size out of the 32 council areas in Scotland (2018-28).

This will have a significant impact on the services in the County and will need to be carefully managed to ensure that infrastructure provision such as health facilities and schools can keep pace with this change. This will be set against increased council budget pressures.

Spatial Considerations

While the Evidence Report does not deal with the spatial strategy it is impossible to consider future levels of housing without having regard to the growth pressures on the County and the environmental constraints that it contains. This spatial information is important as it provides a context to the aim of National Planning Framework 4 of Rebalanced development which states, 'We will target development to create opportunities for communities and investment in areas of past decline and manage development sustainably in areas of high demand'. The information allows a national view to be taken on these areas of decline and development pressure and ensure the best use of Scotland's natural and physical infrastructure.

Managing Changing Population Demographics

The population in East Lothian will increase over the next 20 years but the proportion of older people will also increase. This will need to be addressed by the LDP.

Responses on behalf of the development industry refer to the Scottish Government strategy Housing 2040 and one of its aims which states '*Making the best use of our homes – As an older person wanting to move, I can get help to move to a home which better meets my needs; my current home is no longer right for me but would be ideal for a family.*'. This sentiment was reflected in the survey carried out as part of the Councils Local Housing Strategy and highlights the need for Councils to respond to the changing demographics of Scotland.

Our surveys point highlight that many older people wish to stay in their own homes for a variety of reasons and support could be improved by action beyond the realm of the planning system. However, there were a number of respondents who were interested in downsizing or living in communal establishments and the need for different types of housing was highlighted. This changing age profile does not mean that the overall level of housing needs to increase, more that some of it needs to be provided in a different manner.

Levels of Housing Land and impact on availability of Housing for older people and disabled people

The LDP1 strategy has been successful in as much as it has identified land to meet the SESplan requirement in locations that are viable. The housing has also been accompanied by a comprehensive range of community infrastructure.

The land has the capability to provide a range of housing to meet the needs of the population and every effort is made during the application process to ensure a mix of housing to address the issues raised in the Evidence Report.

However, there is currently no mechanism to require private housing to include specialist need such as wheelchair accessible housing and conversations during the engagement period highlight instances where there adaptation of standard house types has been refused by developers.

Engagement on the LHS also highlighted that there is a reluctance from parts of the development industry to deliver smaller units, bungalows or flats with the reason given that these house types are not what the market wants.

Housing needs of older people

From our survey, 17% felt that their home was unsuitable for their needs, this means that almost one in five feel that their accommodation is unsuitable. Older respondents were more likely to believe that their accommodation was not suitable, perhaps as they have aged their needs are greater, meaning they need more support. Preventative measures and early intervention would help to avoid situations such as this. Unsuitable accommodation can result in accidents such as falls resulting in hospital stays. Those in the private rented sector were most likely to be living in accommodation which they deemed unsuitable for their needs. The main issue centred around stairs, with many struggling as they are getting older or worrying that this will be an issue as they age. It highlights the importance of single-story accommodation for older people.

Adaptations that respondents had undertaken were mainly bathroom adaptations and grab-rails, again low-level interventions such as these can greatly improve quality of life for older people, as well as providing them with a safer home.

Looking to the future, there was a sizeable number of respondents who would like more information around downsizing or alternative housing models such as co-housing. It is important that any strategies look at the whole spectrum of potential housing options to ascertain whether or not there are any options or choices that could benefit the residents of East Lothian.

There are many who will prefer to remain in their own property, for reasons such as location, family and support systems in the area and they should be supported to do so across all tenures where feasible.

Delivery of Affordable Housing

The LHS has an ambitious target for delivery of affordable housing. This was originally set higher but reductions in government funding have forced these figures to be paired back. There are several issues that will additionally restrict the ability to delivery affordable housing of any type:

- The lack of land owned by the Council ownership restricts housing provision.
- Interest rates continue to rise. This makes borrowing more expensive.
- Increase in construction cost and higher new build standards will reduce the number of homes we can build.
- 60.2% of lower quartile income (low income) households are unable to afford home ownership.
- House prices are generally higher in rural areas and smaller communities.
- The number of affordable housing isn't equal across areas in East Lothian.
- Property sizes for affordable homes vary. Low numbers of 4+ bed homes result in overcrowding.
- Housing list numbers for those needing a social home have increased by 700 households within a year.

- Based on our research, 57 % of residents are unable to afford to rent within the PRS.

The delivery figures in the SHIP which accompanies the LHS are only over the next 5 years and will cross over with the HLR of the next LDP by potentially only 2 years. It is also based on the land becoming available through the delivery of existing allocations and finance from the Scottish Government. Therefore, the new HLR will not have a significant impact on the delivery of the SHIP.

The LHLR could deliver additional affordable housing but, given the lead in times for new sites, the new allocations would mainly be delivered in the middle and final third of the housing delivery pipeline. Both these timeframes are outside the scope of the new LHS and SHIP and sits within a timeframe where funding for affordable housing is unknown. It would not be prudent to allocate additional sites without knowing whether additional affordable housing would be delivered particularly as funding has recently been scaled back for affordable housebuilding across Scotland.

The allocation of additional housing could in theory deliver more affordable housing at a higher rate if the % was increased to 30 or 35%. However, the issue of site viability would need to be considered as part of this discussion as well as the availability of finance to deliver the sites.

Also, NPF4 has an exceptions policy that allows for small scale affordable site to come forward during the LDP period and this would allow for more sites to be delivered if additional finance did become available.

Wheelchair Accessible Housing

Quantifying the current needs and future projected demand of those require wheelchair accessible housing and specialist housing provision with social care support is not a simple task. Not all people with long term conditions choose to access support from services within the Council. The data presented in the Needs Assessment primarily relate to individuals who are known to services, whether that be via East Lothian's Council's housing list, using Care & Repair Services or receiving social care or support via the H&SCP.

There is currently no mechanism to record the number of private homes which are wheelchair accessible. New build properties are not built to Housing for Varying Needs (HfVN) standards or wheelchair accessible standards. As a result, any accessibility provisions found in private sector homes is often the result of the owner adapting the property.

Just under 19% of Council properties had adaptations fitted. Musselburgh had the most adaptations, at 31%. Safety rails (including external, internal and grab rails) and wet floor showers are the most common adaptations within all tenures of housing.

There were 385 households on the Council Housing List requiring a property with an adaptation. 80% of these were households with a pensioner, 16% were adult households under 60 and 4% were households with children. Of these, 2.6% required a fully wheelchair accessible home.

Of those on the Housing List, 63% were eligible for a one bed property, 17% for a two bed and 3% for a three bed. The highest demand for properties were in Musselburgh, accounting for 44.7%, followed by Haddington and Lammermuir (13.5%).

To meet the needs of those receiving care and support from H&SCP, a total of 25 units of general needs tenancies and four x 12 unit core and cluster developments are required over the following 5 years for. This translates to roughly 17 units per annum for the lifetime of the LHS 2023-28. Using the current Housing Supply Target (HST), this accounts for 8% of affordable housing per year.

Apart from the units above, to meet the demand of general needs housing, 20 wheelchair accessible homes should also be built. Using the HNDA2 Housing Supply Target, this accounts for 10% of affordable housing per year.

Other Affordable Tenures

There are no legislative requirements for MMR homes to be HFVN, and are therefore not included within the targets above for wheelchair accessible homes. Should legislation change, for example, via NPF4, it is suggested that an additional % is applied to MMR.

Private Homes

Over the last 11 years there has been an average of 700 homes built in East Lothian, including affordable homes. A HST of 189 affordable homes, takes the average number of private sector homes to 339 per annum.

It is recommended that 5% of all future private homes are built to wheelchair accessible standards. Within this there should be a 60:40 split between smaller 2 bed properties and 3-4 family homes. Using current supply numbers, this would translate to around 17 wheelchair accessible homes built per annum with 10 smaller properties, and 7 family-sized homes per annum. This target should be reviewed annually.

Housing for Young Persons

There is consensus across different teams that there is a lack housing in general, meaning young people (YP) are waiting for long periods of time. In addition, there is a perceived shortage in the amount of supported accommodation that is available. Supported accommodation is seen as necessary as many YP do not have the necessary skills to sustain a tenancy.

Conversely, the information received through the online engagement showed that young people were less worried about paying for accommodation as running it, with cost of energy being a concern along with house maintenance.

Access to transport was a big issue with responses being impacted by the proximity to train stations. However, generally young people thought that there was good access to public transport.

There was a desire for larger properties and to be able to live alone but the information is inconclusive as to whether this was a realistic possibility based on income or circumstances.

Rural Housing Availability and Need

East Lothian is a pressured rural area due to its proximity to Edinburgh. As such it has not experienced any decline in rural population and there is no need to consider policy for resettlement.

The policies in the LDP encourage appropriate housing in the countryside, particularly the redevelopment of building of architectural merit such as old steadings. This policy has been a success with many properties being repurposed in this way.

The Strategy of LDP1 was to focus most housing allocations into the main settlements due to their proximity to services. There was less focus on rural areas. Notwithstanding the aim in NPF and the next LDP to focus new development in areas within 20-minute neighbourhoods, studies have shown there is a demand for affordable housing in rural areas and it is important to allow communities to

growth at an appropriate and scale. With a considerable level of housing still to be delivered in main settlements this land supply could be augmented by some smaller sites in smaller communities.

Some engagement responses stated that the geography of East Lothian has an impact upon service provision. Comments were made that that provision “adversely affects those living in rural areas” and it was believed that there is a need to make rural community councils aware of resources and link up with other community councils in different rural areas. It was also felt that population density will impact upon where services are provided, leading to gaps in provision.

The affordability of housing was a thread which ran through many of the responses to the engagement process. Some of the key concerns raised in regards to affordability were:

- A lack of affordable housing options.
- Increasing costs of private housing, both to rent and purchase.

Another area that respondents highlighted was the supply of housing within rural areas.

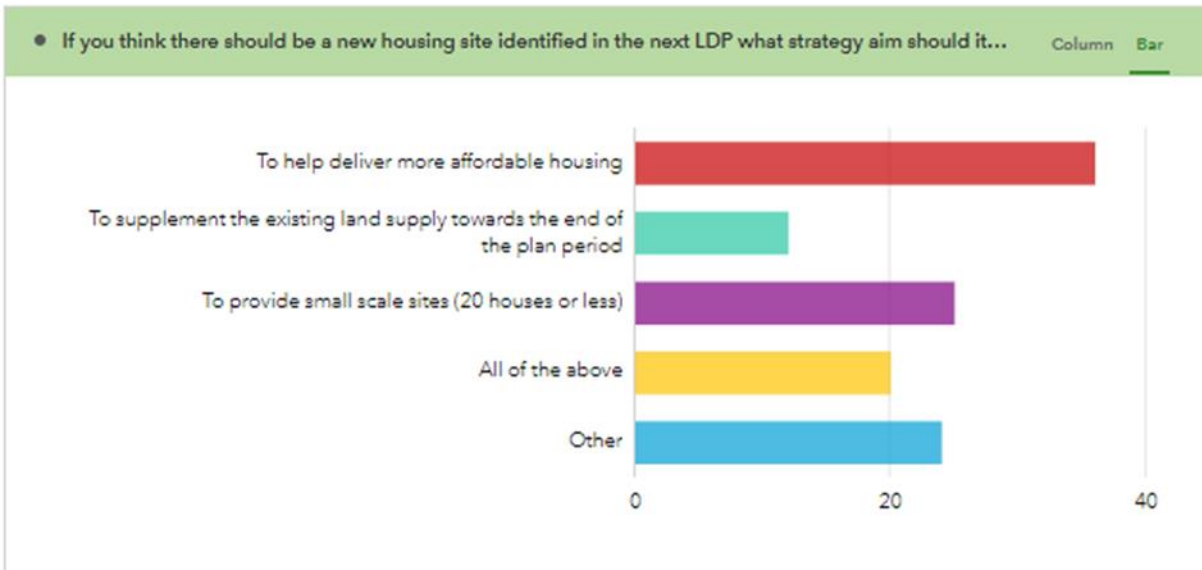
- Respondents voiced an imbalance between the type of houses, in terms of design, size and affordability, built by developers and the perceived needs of the local population.
- The need to increase the availability of affordable including social homes.
- Regarding recent high levels of development within East Lothian, respondents observed a need to prioritise those on a smaller scale over those of larger proportions.

Growth in rural areas is often a contentious issue, highlighted within comments within the survey regarding recent growth. A summary is provided below.

- Most participants (78%) had seen growth within their area in the last five years.
- The amount of growth tended to be greater in more urban areas with those residing in rural areas generally less likely to have seen growth.

STAKEHOLDER INVOLVEMENT

Through engagement the need for more affordable housing was the paramount issue raised. This was added to by a desire for more smaller sites in rural areas both for market and affordable housing.



Through the LHS engagement the key messages were:

- Undersupply of affordable housing.
- Lack of suitable affordable housing for larger families.
- Lack of suitable affordable housing for single people.
- Planning of developments to ensure that social housing and private housing are viewed equally.
- Location of housing, ensuring that provision meets demand in particular for those who wish to remain in the west of the county.
- Affordability of housing

In terms of the supply of housing within East Lothian, there was a general consensus that there is not enough variety of housing to meet demand. Specific examples raised within the engagement included a lack of suitable housing for both families and single people. There was also a feeling that the location of housing is important, and that development needs to be where demand is highest. It was also felt that there is a need to ensure that private and social housing are viewed equally when planning new developments.

Concerns around affordability were also raised across all tenures. Within the private sector concerns centred on the cost of purchasing a home and the affordability of rent in the PRS. Within the social rented sector, the issue of RSL rents being more expensive and the unaffordability of temporary accommodation for those who work was also a talking point.

Information was submitted to the engagement promoting a higher housing land requirement than that presented by the Council based on several premises including the need to address affordability, the benefit to the local economy.

Homes for Scotland commissioned research to investigate the levels of concealed need across most Scottish Local Authorities. It concluded that there is a substantial level of unmet need which could be addressed through additional land release.

Surveys were carried out focussing on the needs of disabled residents. People with disabilities are often bound to their home, and most likely to one specific room due to the lack of accessibility in and around their property. The make-up of existing stock and infrastructure means that individuals often have to compromise on accessibility and remaining in their home which they have emotional ties to. ELC needs to make sure that houses can adapt to the needs of the person rather than a person having to adapt to the limitations of their home.

More context and details of the Engagement with Gypsies and Travellers is provided in Appendix 1 to this document.

WHAT THIS MEANS FOR THE PROPOSED PLAN

Affordable Housing levels

The need for affordable housing will continue to be a key theme in the Proposed Plan and NPF Policy 16 will be implemented through providing a minimum of 25% affordable units on development sites. Given the demand for affordable housing work leading up to the Proposed Plan will investigate the possibility of raising the affordable site percentage contribution, either in specific towns or across the County. We will also investigate the most appropriate manner to ensure a greater delivery of smaller units to address affordability and the needs of the changing population.

Land Availability for Housing

There remain around 8000 houses to be built from the allocations in LDP1. This is around half of the LDP1 total. Over 90% of these sites have permission and are under construction meaning they can be relied on to deliver housing supply during the lifetime of the LDP. As a precursor to the Proposed Plan, sites not under construction will be assessed using the same site assessment methodology as will be used for new sites. Within this mix there is a standard 25% affordable housing which will deliver a range of tenures and types of housing as identified through the LHS.

Specialist Housing including Wheelchair Accessible Housing

Within this affordable element and private housing, we will need to address the needs of specialist groups, and this will be carried out in coordination with our housing colleagues and the Local Housing Strategy and Strategic Housing Investment Plan.

The requirement for disabled housing will be incorporated into the Proposed Plan with the set out in this include a requirement for disabled housing and ensure that a proportion of sites are adaptable for disabled residents. The need to introduce a wheelchair accessible requirement on private housing and to reflect the content of the Local Housing Strategy in Affordable Housing Supplementary Planning Guidance.

East Lothian is projected to have a proportionate increase in the number of older residents. While many of these people will not need specialist housing there will still be demand for assisted living. The Proposed Plan will need to consider how best to provide the flexibility for care homes or similar developments to progress in the right locations.

The Proposed Plan will also have to investigate options for ensuring a greater mix of housing on private and affordable sites to cater for older people wishing to downsize or move to more accessible housing.

Self-Build Housing

Self-build housing will also require to be addressed with the possibility of sites being identified in settlement statements for self-build. We already have a register so the challenge for the Proposed Plan is to provide suitable land.

Gypsies and Travellers

Finding evidence of the need for gypsy and travellers' sites has proved challenging through the development of the Evidence Report. The Council will continue to work with other neighbouring authorities to assess the housing needs of these groups. The Proposed Plan will be sufficiently flexible and reflect NPF4 Policy 16(d) to ensure that future need and opportunities can be addressed in appropriate locations.

More context and details of the Engagement with Gypsies and Travellers is provided in Appendix 1 to this document.

Short Term Lets

Identifying accurate figures for the levels of short term lets is challenging. There have been several counts carried out all with different results. The Council is currently implementing the short term let licencing scheme and this will give a more definitive figure of the numbers of lets. Alongside the Proposed Plan the Council will have to make a decision on whether short term lets in sufficient numbers to merit identifying control areas. Many of these short term lets are already being considered through the planning process. Decisions on control areas will need to be factored into the settlement strategies for the LDP.

Impact of Short term lets and second homes

'An authority may wish to take account of the proportion of ineffective stock relating to second homes, vacant properties and housing used for short-term letting (holiday accommodation) within their area. This can be a locationally concentrated issue within an authority area and does not generally accommodate existing housing need. It could therefore be a local factor for increasing the LHLR'.

The highest concentration of second homes and short term lets are in the East of the County, in Dunbar and North Berwick. There are no housing need figures are such a local level so it is not possible to ascertain whether the concentrations of short term lets is proving to be an issue in restricting the housing stock to meet local needs. It should be noted that the North Berwick Trust intend to carry out their own assessment of need and demand for housing which could inadvertently feed into this debate.

Rural Housing

The Proposed Plan will need to consider whether small allocations in tier three settlements (see 20 Minute Neighbourhood Background Paper) is appropriate to allow small scale expansion, support local facilities or provide affordable housing. There is no evident need for large scale rural allocations.

AREAS WHERE THERE IS AGREEMENT OR DISPUTE

There is no dispute on the level of housing change that has and will continue to take place in East Lothian. The evidence clearly shows there will be more demand for affordable and specialist housing and a need for a greater mix of housing with more smaller properties. There was no dispute on these points, but differences will emerge at the Proposed Plan stage when policy interventions are considered.

Appendix 1

EAST LoTHIAN LOCAL DEVELOPMENT PLAN 2

Gypsies and Travellers Engagement

INTRODUCTION

The Planning (Scotland) Act 2019 introduced the requirement to seek the views of, and have regard to any views expressed by Gypsies and Travellers in the evidence report for preparation of the Local Development Plan (section 16B), in particular:

Section 16B (3)(c) set out—

- (i) a summary of the action taken by the planning authority to meet the accommodation needs of Gypsies and Travellers in the authority's area,
- (ii) an analysis of the extent to which the action has helped to meet those needs.

Section 16B(4)The evidence report must also include a statement on -

- (a) the steps taken by the planning authority in preparing the report to seek the views of gypsies and travellers in the authority's area.

Section 16B (14) –

In this section— “accommodation needs” includes, but is not limited to, needs with respect to the provision of sites on which mobile homes may be stationed.

Annex D Local Development Planning Guidance (May 2023)

Preparation of evidence report

For the purposes of section 16B of the Act “Gypsies and Travellers” means persons, whatever their race or origin, who are—

- (a) of or from a nomadic cultural tradition including—
 - (i) members of Gypsy, Romany and Traveller ethnic groups including Roma Gypsies, Scottish Gypsy Travellers and Irish Travellers,
 - (ii) persons who have ceased to travel temporarily or permanently,
- (b) members of an organised group of Travelling Showpeople or circus people (whether or not travelling together as such).

GYPSY/TRAVELLER SITE WHITECRAIG

The site for Gypsy/Travellers in Midlothian at Whitecraig (between Musselburgh and Dalkeith) is currently closed following extensive damage to the site. The former site had been managed by East Lothian Council and consisted of 20 pitches with each pitch including:

- its own hard standing for parking a caravan and one other motor vehicle.
- an amenity block with a toilet and shower/bath, kitchen area
- a hook-up facility to provide electricity to your caravan.


A conditions survey report concluded that extensive works would be necessary to bring the site up to minimum standards. However, it has been concluded that overall, the site's location is not suitable for the Gypsy/Traveller community and that the reinstatement of the site would not be appropriate. There are also two private sites in East Lothian.

TRAVELLING SHOWPEOPLE

There is very little quantitative and qualitative information available on Travelling Showpeople and their accommodation needs in East Lothian. There are currently no private or public sites for Travelling Showpeople within East Lothian, the nearest public site lies within the City of Edinburgh.

OUTREACH, ENGAGEMENT & INFORMATION

The table below sets out the outreach, engagement and information gathered by East Lothian Council to seek the views of Gypsies and Travellers.

| Outreach & Engagement | Information |
|---|---|
| Attendance at Gypsy Traveller Roma Forum – ongoing | Raised issue with difficulty in gathering information on accommodation needs particularly following the closure of the Whitecraig site. |
| Attendance at the ROMA Network. | <p>In January 2023, Community Renewal Trust and Rom Romeha in partnership with MECOPP commissioned Red Lynx Limited to undertake a research programme around Roma in Edinburgh.</p> <p>A report was published which provides some good primary research however further work would need to be undertaken to understand need at a local level.</p> <p>Next steps noted in the report:</p> <p>A formal mapping exercise may be undertaken following publication of emerging census data in 2024.</p> <div style="text-align: center;">  <p>Roma Network Edinburgh Research Mar 2023.pdf</p> </div> |
| <p>Housing Strategy and Planning Policy Teams met with the Scottish Government Gypsy/Traveller Accommodation & Residential Mobile Homes Team in <u>March 2023</u> alongside MECOPP.</p> <p>Contact with MECOPP August 2023.</p> | <p>The meeting was about how ELC could engage with the Gypsy/Traveller community. MECOPP said engagement through them was likely to be difficult due to lack of capacity. Engagement with Gypsy/Travellers at the Edinburgh Cairntow site were suggested but put on hold until redevelopment was completed and residents had had time to settle in properly.</p> <p>MECOPP engaged with a former resident on the site at Whitecraig who currently resides in settled accommodation in East Lothian.</p> <p>Follow up email to MECOPP to see if there are any other avenues we can explore to engage and gather evidence on need across the East Lothian Council Area.</p> |

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| Email from MECOPP December 2023 | Invited to have a stall at a forthcoming Edinburgh & Lothians Health Rally January 2024. |
| Evidence report engagement - storymap June 2023 - | The story map included a question around need for a site in East Lothian – responses are highlighted in table below. |
| Scottish Showman’s Guild – October 2023 | ELC phone conversation with the Chairman of the Scottish Showman’s Guild about site requirements for Travelling Showpeople in East Lothian whether this is for a yard for storage and/or accommodation. |
| Edinburgh and Lothians Health Rally – Fisherrow Centre Musselburgh, Friday 19 th January 2024. | <p>MECOPP extended an invite to both East Lothian & Midlothian Council, Planning and Housing departments, to attend.</p> <p>The event was for Gypsy/Traveller families and focussed on promoting the health and wellbeing for people of all ages in the community. We are inviting relevant service providers to have a stall at the event to promote their services and meet members of the community.</p> |
| Site Visit Cairntow, Edinburgh – 25 th January 2024 | East Lothian and Midlothian Council were shown around the existing site at Cairntow, Edinburgh by the site Manager and MECOPP and were able to speak to residents about the site and wider community accommodation need. |
| Scotland’s Census 2022 – ongoing | <p>Gypsy/Traveller – data gathered at recent site visit indicated that the census number is very low and probably about 2 - 3 times what was recorded (4,000 people).</p> <p>Scotland’s Census included a showman and showwoman option for the first time.</p> <p>The census output release schedule May 2024 will provide information on ethnic minorities in the area which may assist in better understanding local need.</p> |

STAKEHOLDER VIEWS

The following sets out evidence gathered through engagement with a range of stakeholders at the Evidence gathering stage of the preparation of the East Lothian Local Development Plan. It should be noted that a lot of this evidence has been shared through lived experience.

| Engagement | Stakeholder Views |
|------------------------------------|---|
| The Scottish Showmen's Guild | <p>The Chairman of the Scottish Showmen's Guild explained that there is currently no site provision for Travelling Showpeople in East Lothian.</p> <p>He explained that some members have settled in and around the North Berwick/Dunbar areas. A move into bricks and mortar accommodation is often linked to settlements with amusement arcades and can be for a variety of reasons. There was a shift around 10 years ago to settled accommodation, but the Showmen's Guild have seen a move away from this. This is particularly due to the loss of community feel from not being on a site. There are two members who have mentioned looking for sites in the East Lothian area through the AGM though no specific settlements.</p> <p>Sites would be for parking homes and/or storage of equipment – provision for both would enable equipment to be safely stored and maintained in close proximity of their home.</p> |
| Evidence from Lothian Health Event | <p><i>"Discussion a lady who is looking to be relocated from social rented accommodation in Edinburgh. She would like to relocate to West Lothian so she can support her daughter who lives there just now and is a full-time carer for her child. She says that she is often faced with prejudice if people know she is a gypsy traveller and is concerned that that is why she has not managed to be relocated to date. She has been on the waiting list for 4 years".</i></p> <p><i>"Conversation with a young boy, 15 years old. He currently lives in social rented accommodation with his grandparents. His grandparents do not travel anymore due to health conditions. He has lived there for most of his life. He would like to get his driving license in the next few years and indicated that he would like to travel however he said that younger people find it very difficult to do so as there are not enough sites for them to stay on".</i></p> |

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| | <p><i>“Female aged 78, living in a social rented property in Haddington. Left the site at Whitecraig when she decided she was too old for roaming. She said that her daughter also decided to settle since with her two children, they live in a social rented property in Musselburgh.</i></p> <p><i>The person said that the site was never a nice site. The pylon was intimidating, access to the site was really bad. They always had to organise each other, and get one car down to do a food bank run for the whole site at once as there were no bus connections. Likewise getting people to GPs and schools was always very tricky from that site.</i></p> <p><i>She was talking about the stigma travellers face. There are a few Travellers in EL, but they don’t make themselves known. Because of the stigma travellers try and stop at dedicated sites most of the time. So, when there is no site available, they don’t stop. So, it is hard for her to tell if anyone would stop in East Lothian just now, she thinks if a site would be available then people would stop in East Lothian. She said the site in Edinburgh is really nice. She said Travellers refer to it as the Duddingston site”.</i></p> |
| <p>Cairntow Site, Duddingston, Edinburgh Show round and Invitation to One Pot Cooking Club – Thursday 25th January</p> | <p><u>Site Manager (Gordon Thomson):</u> The refurbishment of the site at North Cairntow was completed in December 2023. Several of the residents lived locally while the refurb was being undertaken. The residents have been there for a long time and there is a very low site turnover. There are twenty pitches on the site (Ambleside type – 2 bed caravans) each pitch has a separate toilet/storage building, this was considered to be a really important feature for each of the pitches which the community members pushed for during design stage. A hardstanding area provides space for caravans and other vehicles to park on. The site includes a community unit and site managers office. The community block is a great hub for residents to meet and events like the One Pot Cooking Club are held there monthly along with a food bank. Gordon explained that they owned more land towards the railway line which would be great for expansion of the site however funding was an issue. There was little objection to redevelopment of the current site and some of the surrounding residents/adjoining properties are members of the community.</p> <p><u>Discussion with residents:</u></p> <ul style="list-style-type: none"> • One of the current residents explained that her daughter would be interested in a local site if one was available. Although she can visit it would be good to be able to be nearer her family as the site in Edinburgh full. |

- Donna from MECOPP spoke to a father and son on the phone. The father lives on the site and the son off site in rented accommodation. They both said that they felt there was a need for more site options as there are already around twenty people on the waiting list for Cairntow. There is a definite demand for more sites. They said that relatives (daughter/sister) would consider a site if it was in East/Mid Lothian. Temporary sites would also be good.

- One of the residents we spoke to explained that she used to live on the site near Whitecraig however, does not miss it due to the condition the site was in. It was in a remote location and did not like that it was sited underneath electricity pylons. You had to walk along an unlit road to get to the site and it was extremely difficult to go anywhere unless you had a car. It was not a great place to live, and she felt it had a negative impact on her wellbeing.

She is happy to have her pitch at Cairntow and showed us round her home and outbuilding but did say she preferred living in her van. At present her caravan is in the West of Scotland as she was there looking after her father who had been unwell and sadly passed away. She said it was good to be able to keep her caravan on site next to her on Cairntow.

- Younger Gypsy/Travellers have been struggling to find accommodation and as a result have had to declare themselves homeless as could not get anywhere and are now in private rentals. There is a want amongst the younger community to travel however, the reality is there are very few site options. A lack of temporary sites makes this very difficult and more permanent sites are full.
- Resident explained that more options are needed to pull on and off for visiting and travelling around. The Edinburgh site is really the only available one on the east coast and that there are far more sites in the west of Scotland.

General Comments:

Those who had been on the Whitecraig site were all in agreement that it was not a great place to stay due to the condition of the site and the remote location.

We talked about the Innerleithen site in the borders which is a private shared facility as a public campsite and Gypsy/Traveller site. It is a mixture of grass pitches and hardstanding.

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| | <p>Gypsy/Travellers are restricted to the hardstanding pitches where they used to be able to choose before. It is considered a good secure site however it is not open all year round.</p> <p>The private site in East Lothian at Muirpark Steading Tranent was specifically for extended family members to visit and had capacity for several caravans. This has now been sold on and there have been recent planning applications to convert the utility block to a house and build a second home on the site as accommodation for settled Gypsy/Travellers.</p> <p>If creating a new site involvement of the community for the outset is encouraged as it helped shape the design at Cairntow. The old site at Cairntow and Whitecraig had playparks with some equipment however the new site does not. There is space for play within each individual pitch ground, but this is hardstanding.</p> <p>The monthly cooking club and regular food bank are well used by residents.</p> <p>We talked about the last census count and the ladies we were speaking to said there is still so much the stigma faced by Gypsy/Travellers that many would not fill in the box on the census. As a result, they thought the number was probably around 2 - 3 times more than the reported figure of 4,000 people.</p> |
| <p>MECOPP Site Visits – (This information is gathered and forwarded to us by MECOPP)</p> | <p><i>“I was with a Gypsy/Traveller man today, he lives alone in a flat in Edinburgh. He is very keen to get out of the flat and onto a site. He said he ‘doesn’t have a chance’ of getting on Edinburgh so there is no point. He would be keen to move somewhere with chalets, but also an option for trailers”.</i></p> <p><i>“I had a conversation with family at a roadside encampment. The families would be keen to see a site they could move on to. They know they won’t get on Edinburgh as it’s full. And that the site on the ‘other side of Edinburgh’ (they mean Dalkeith) is now closed. They are talking about having to go into bricks and mortar, although that isn’t what they want. The group was made up of an older couple, their adult sons and their partners and children (3 households)”.</i></p> |

General Public Consultation Responses

49 responses (Breakdown 18 Yes/ 27 No / 2 Maybe / 2 Don't know).

Main issues arising:

| Need for New housing sites: | | Site identified? |
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| <p>Consultation is needed to establish what service want / need.</p> <p>Note that the population are difficult to engage with so consultation is hard.</p> | <p>Concerns about rubbish / mess that can be left behind.</p> | <p>North Berwick on route to Drem</p> <p>Dunbar south side of A1 at bear roundabout</p> <p>Haddington at old A1 Council yard</p> <p>East Linton to the east of Pencraig</p> |
| <p>ELC should enable/support gypsy travellers to live the way they want.</p> | <p>Concern about negative impact on nature land e.g. lagoons and bird reserve in Musselburgh.</p> | <p>Cockenzie or Torness</p> |
| <p>Yes, site needed since other site has closed so there are no options.</p> | <p>Unofficial sites have a reputation of being used irresponsibly and at a cost to landowners and local community.</p> | <p>Nowhere too remote</p> |
| <p>Yes, need to provide adequate appropriate housing sites.</p> | <p>Question is meaningless unless considered in much wider context of transient people and visitors to East Lothian, for which the council seems to have no coherent approach.</p> | <p>Green near Polson Park</p> |
| <p>Properly serviced areas are required (toilet & washing provision).</p> | <p>If facilities are provided, they should be paid for.</p> | <p>Strathern Avenue North Berwick</p> |
| <p>Identifying a site may encourage use of legal site reducing antisocial occupation of areas.</p> | <p>Other negative comments were received.</p> | <p>Brownfield sites.</p> |

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| | | Yes, but in consultation with Gypsy/Travellers and local community. |
| | | Within existing caravan sites |
| | | Not public green areas due to clean up costs. |