

Topic Paper - General Housing Issues

ELC 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 Infrastructure and Spatial Strategy Topic Paper or Area Partnership sections of the StoryMap.

LINKS TO EVIDENCE

ELC 047	ONS East Lothian Facts and Figures East Lothian (S12000010) - ONS
ELC 048	South East Scotland Housing Need and Demand Assessment SES Regional Planning — The Edinburgh and South East Scotland City Region Deal (esescityregiondeal.org.uk)
ELC 091	Local Housing Strategy 2024-2029 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 to 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
ELC 388	Student Living Report 2024

1. SUMMARY OF EVIDENCE

Housing Context

- 13.1 East Lothian has experienced, and will continue to, high population growth. This has been fuelled by recent Development Plan 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.
- 13.2 Sites for over 16,000 houses were included in the LDP. 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. Over 90% of the sites allocated have planning permission and around half have been built.
- 13.3 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.

Population and Demographic Change in East Lothian

- 13.4 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%.
- 13.5 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 the 2011 Census.
- 13.6 East Lothian will continue to face a high population increase, particularly in terms of people aged 65+. This will create greater demand for accessible and adaptable housing.

Housing needs of the population in the Area.

- 13.7 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,’.

- 13.8 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. The Steady Growth scenario was agreed by the SE Scotland Directors group in 2022 as representing the most realistic possible growth scenario over the next 20 years. The SE of Scotland experiences the most growth across the country and this is projected to continue. However, the Steady Growth scenario factors in probable economic fluctuations in a similar manner that have been seen over the last 20 years.

Housing needs of those undertaking higher education

- 13.9 Queen Margaret University has undertaken 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.
- 13.10 Another survey was carried out as part of the LDP/LHS development was the young person's online engagement report (ELC 376).
- 13.11 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)
- 13.12 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.

Housing needs of older people

- 13.13 The land identified through the LDP for housing 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.
- 13.14 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 their adaptation of standard house types has been refused by developers.
- 13.15 As part of the LHS/LDP development a survey was carried out on the future housing needs of older people (ELC 373). 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,.....'
- 13.16 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'.
- 13.17 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. Adaptation payment request by recipient show that older people account for a higher percentage of adaptations than 'disabled adult' (58.6% to 41.4%).
- 13.18 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.

13.19 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.

13.20 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.

13.21 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.

Housing needs of disabled people

13.22 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

13.23 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.

13.24 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.

13.25 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 level 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.

13.26 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.

- 13.27 The HLR 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 significant additional sites without knowing whether additional affordable housing would be delivered particularly as funding has recently been scaled back for affordable housebuilding across Scotland.
- 13.28 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.
- 13.29 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.
- 13.30 In 2024 the Council declared an affordable housing emergency due to the levels of need and the reductions in funding to deliver affordable sites. As set out in the Housing Land Requirement Topic Paper, adding an additional allocation to the HNDA plus generosity calculation will, along with the other options above, assist with providing more opportunities for the delivery of affordable housing towards the end of the LDP period, although this does inevitably rely on the availability of appropriate levels of finance.

Availability of land in the district for housing

- 13.31 The 2023 Housing Land Audit shows that there is land for around 8,000 houses remaining in the land supply. Over the last 11 years there has been an average of 700 homes built in East Lothian, including affordable homes.

Self-Build Housing

- 13.32 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.

Wheelchair and Specialist Need

- 13.33 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.....'
- 13.34 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.
- 13.35 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.
- 13.36 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.
- 13.37 To meet the demand of general needs housing, 20 wheelchair accessible homes should also be built. Using the HNDA3 Housing Supply Target, this accounts for 10% of affordable housing per year.
- 13.38 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.

- 13.39 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.
- 13.40 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.
- 13.41 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.
- 13.42 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.
- 13.43 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%).
- 13.44 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.
- 13.45 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

- 13.46 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.

Land for Gypsy/Travellers and Travelling Showpeople

- 13.47 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 Appendix 1 to this Topic Paper. 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*. This engagement will continue to be pursued alongside the Proposed Plan.

Short term lets

- 13.48 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 terms lets and once this has concluded a more accurate view of their numbers and concentration will be available and policy will be developed.

13.49 Development Plan Guidance states: *'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'.*

13.50 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 at 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.

Second Homes

13.51 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

13.52 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.

13.53 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. Consequently, there is no need for further analysis to 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.

13.54 However, a study was undertaken to understand the views of residents on the availability of rural housing. The Rural Housing Survey Analysis (ELC 374) also considers the housing needs of rural areas including affordable provision.

13.55 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.

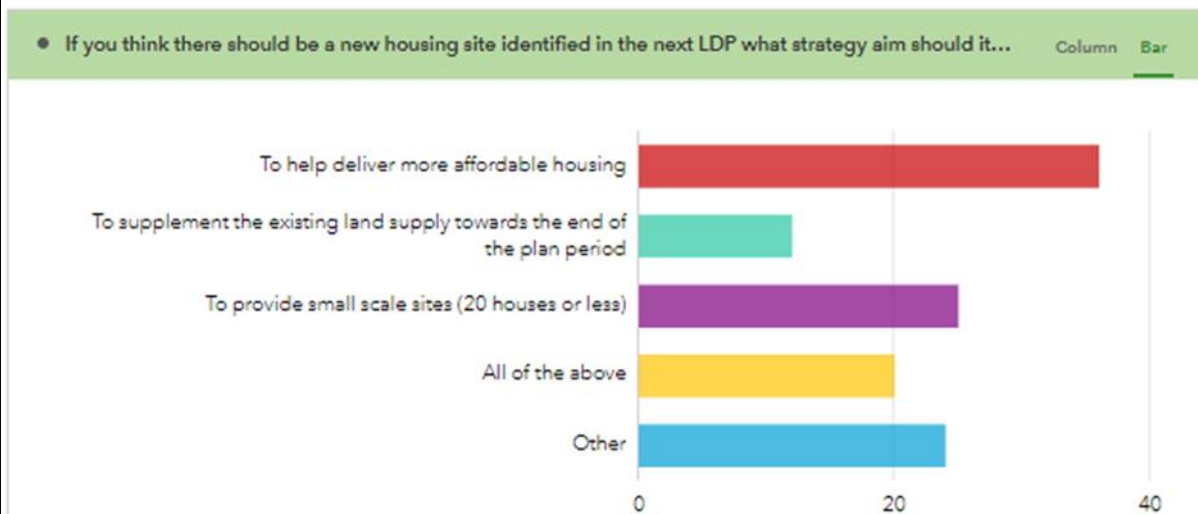
13.56 The Strategy of LDP1 was to focus most housing allocations into the main settlements due to their proximity to services. There was less focus on rural areas. Notwithstanding the aim in NPF and the next LDP to focus new development in areas within 20-minute neighbourhoods, studies have shown there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

13.57 The Site Assessment Methodology (ELC 059) that accompanies this Evidence Report states that in smaller settlements sites will normally be limited to 5% of the existing number of dwellings.

SUMMARY OF STAKEHOLDER CONSULTATION

13.58 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.

13.59 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.



13.60 Much of the Housing engagement for the Evidence Report was carried out as part of the development of the Local Housing Strategy. This approach was more efficient and ensures synergy between the planning and housing functions of the Council. More details on this joint consultation with other Council services and involving other housing related public bodies can be found in the Summary of Evidence Report Engagement Topic Paper (ELC 060). 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.

13.61 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 open space, type of housing, over provision or large detached housing and a need for smaller sites in rural communities.

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

13.63 Responses on behalf of the development industry collectively 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.

13.64 Our surveys 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 few 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.

13.65 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. Some respondent thought that control areas should be introduced in these areas.

13.66 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.

13.67 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 regard to affordability were:

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

13.68 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.

13.69 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.

13.70 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.

13.71 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.

13.72 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.

13.73 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. Further information on this response can be found on the Housing Land Requirement Topic Paper (ELC 012).

13.74 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.

13.75 Growth in rural areas is often a contentious issue, highlighted within comments within the survey regarding recent growth.

13.76 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.

- 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.

13.77 Some engagement on the issue of rural housing 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.

13.78 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?

13.79 One of the aims of increasing the final Housing Land Requirement is to encourage more affordable housing. The Council has declared an affordable housing emergency and actions to address this issue will be a key focus of the next LDP.

13.80 The spatial impacts of the HLR are not yet known but they will not affect the delivery of affordable housing which will be required on all sites as need exists across the County.

13.81 As part of the development of the Proposed Plan a review will be undertaken of the affordable housing policy to ensure it can deliver the requirements set out in this Topic Paper and the LHS. This will also involve a review of the Supplementary Planning Guidance on Affordable Housing. Joint working between planning and housing will progress throughout remainder of 2025 and will focus on the overall affordable requirement and whether alternative percentages provisions are required for separate parts of the County. We will also review the mechanisms through which land is provided for affordable housing to combat the challenges of a decrease in grant finding for the delivery of projects. The process through which the Guidance will be reviewed will generally progress in the following manner:

- Working Group to review current practice is formed.
- Work on Local Investment Framework is complete (HNDA at an area partnership level)
- Affordable Housing Policy & associated documents drafted
- Elected member briefing
- Consultation with RSLs & Local Authority staff
- Revise AH Policy based on consultation
- Affordable Housing Policy & associated documents go out to consultation along with the proposed LDP2, allowing partners such as Homes for Scotland to respond.

13.82 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.

13.83 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.

13.84 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. Working groups have already been set up with the East Lothian Social Care Partnership and NHS Lothian to ensure that new provision is located in the right places.

13.85 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. 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.

13.86 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.

13.87 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 sites especially to address rural affordable need. The Proposed Plan will need to consider whether small allocations in tier three settlements (see 20 Minute Neighbourhood Topic Paper (ELC 018)) is appropriate to allow small scale expansion, support local facilities or provide affordable housing. There is no evident need for large scale rural allocations, and this would work against the sustainability principles set out in NPF4.

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

13.89 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 the licencing process will be used to determine actual numbers of short term lets in specific areas. In parallel with the development of the Proposed Plan, and working with our licencing colleagues, we will determine whether the impacts of STLs on the housing stock or amenity of an area is sufficient to require the setting up of control areas. Providers and local communities will be consulted on any proposals before they are confirmed in the LDP. The conclusions of this exercise will be reflected in the Proposed Plan.

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

13.90 There are no disputes on these issues and the Evidence Report has been co-written and engaged on with the Councils Housing Service. Any changes to affordable housing levels, controls over short term lets or other requirements are policy decisions and outwith the scope of the Gatecheck.

13.91 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.

13.92 All these issues will be addressed in the Proposed Plan.

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 MECCOP.</p> <p>Contact with MECOPP August 2023.</p> <p>Email from MECOPP December 2023</p>	<p>The meeting was about how ELC could engage with the Gypsy/Traveller community. MECCOP 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>

	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> <p><i>"Female aged 78, living in a social rented property in Haddington. Left the site at Whitecraig when she decided she</i></p>

	<p><i>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

	<p>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.</p> <ul style="list-style-type: none"> 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. <p>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.</p> <ul style="list-style-type: none"> 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. <p><u>General Comments:</u> 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.</p> <p>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.</p>
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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?
<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>	Concerns about rubbish / mess that can be left behind.	<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>
ELC should enable/support gypsy travellers to live the way they want.	Concern about negative impact on nature land e.g. lagoons and bird reserve in Musselburgh.	Cockenzie or Torness
Yes, site needed since other site has closed so there are no options.	Unofficial sites have a reputation of being used irresponsibly and at a cost to landowners and local community.	Nowhere too remote
Yes, need to provide adequate appropriate housing sites.	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.	Green near Polson Park
Properly serviced areas are required (toilet & washing provision).	If facilities are provided, they should be paid for.	Strathern Avenue North Berwick
Identifying a site may encourage use of legal site reducing antisocial occupation of areas.	Other negative comments were received.	Brownfield sites.

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