

Supporting Paper 1: East Lothian Local Housing Strategy 2018-23 - Consultation and Engagement

1. Introduction

East Lothian Council is committed to ensuring that key stakeholders and the local community have a genuine role to play in developing the Local Housing Strategy (LHS) 2018-23. This is critical to ensuring the Strategy reflects local concerns, needs and aspirations.

The purpose of this paper is to:

- evidence that wide consultation has taken place in preparing the East Lothian LHS 2018-23
- provide an explanation of how all relevant corporate and external stakeholders and local communities were consulted
- show that all responses to the consultation have been considered and where appropriate, influenced the LHS

This paper summarises partnership working, consultation and engagement undertaken with key stakeholders and the local community in relation to:

- Informal consultation undertaken to inform preparation of the Consultative Draft East Lothian LHS 2018-23 (July 2014 to December 2017)
- Formal consultation undertaken during the formal consultation period (January to March 2018)

2. Background

In accordance with the **Housing (Scotland) Act 2001**, local authorities must consult on their proposed LHS. A wide range of methods require to be adopted to ensure that individuals and communities have an opportunity to be involved in the process.

Local authorities must also take cognisance of statutory public sector equality duties, set out in the UK Government's **Equality Act 2010**. This requires public authorities to involve, consult and engage with communities as widely as possible, with *Principles of Inclusive Communication* considered a useful reference:

<http://www.gov.scot/Publications/2011/09/14082209/17>

National Standards for Community Engagement were launched in 2005. The Standards are good practice principles, designed to inform and support community engagement and user involvement. Since then, the Scottish Government has made an explicit commitment to support and develop community empowerment, through a range of actions including the passing of the Community Empowerment (Scotland) Act 2015. Work in relation to the Act included a review and updating of the Standards during 2015/16. The review aimed to reflect developing policy and legislation with regard to community empowerment across Scotland and to build on the range of growing practice.

The Standards set out ten statements of commitment that can be used to develop and support better working relationships between communities and agencies delivering public services. They are underpinned by principles of good practice that have been highlighted by community and agency representatives across Scotland to promote equality and fairness.

Each Standard has a series of indicators that can be collated in order to assess performance. The Standards can be used to ensure good practice and hold communities and partners to account.

The Standards aim to transform the quality of community engagement by providing measurable performance statements that can be used by everyone involved to achieve the highest quality processes and results. The goal is for community engagement that is:

- Effective in achievement of the shared purposes of the participants;
- Efficient by being well informed, rational, considered and focused on purpose; and
- Equitable by giving a fair voice to all communities and tackling any barriers that may exclude them

The Council is committed to ensuring compliance with good practice and improving community engagement and the National Standards provide a framework for consultation and engagement on the East Lothian LHS 2018-23. The Standards as these relate to preparation of the LHS are as follows:

1. **INVOLVEMENT:** We will identify and involve the people and organisations who have an interest in the LHS;
2. **SUPPORT:** We will identify and overcome any barriers to consultation and involvement in relation to developing the LHS;
3. **PLANNING:** We will gather evidence of the needs and available resources and use this evidence to agree the purpose, scope and timescale of the engagement and the actions to be taken;
4. **METHODS:** We will agree and use methods of consultation and engagement that are fit for purpose;
5. **WORKING TOGETHER:** We will agree and use clear procedures that enable the participants to work together efficiently and effectively;
6. **SHARING INFORMATION:** We will ensure that necessary information is communicated between the participants;
7. **WORKING WITH OTHERS:** We will work effectively with others with an interest in the LHS;
8. **IMPROVEMENT:** We will actively develop the skills, knowledge and confidence of all the participants;
9. **FEEDBACK:** We will feedback the results of consultation and engagement to the wider community and organisations affected; and
10. **MONITORING AND EVALUATION:** We will monitor and evaluate whether the consultation and engagement achieves its purposes and meets the national standards for community engagement.

In accordance with the National Standards for Community Engagement, partnership working, consultation and engagement in relation to the East Lothian LHS 2018-23 is based on the following principles:

- Fairness, equality and inclusion underpin all aspects of community consultation and engagement on the LHS;
- Consultation and engagement on the LHS has clear and agreed purposes and methods that achieve these purposes;

- All participants are encouraged to build on their knowledge and skills when being consulted on the LHS; and
- Accurate, timely information is provided to enable effective consultation and engagement on the LHS.

3. Consultation Undertaken to Inform Preparation of Consultative Draft East Lothian LHS 2018-23

32 events were held during the period June 2014 to December 2017 and feedback from these events was used to inform preparation of the Consultative Draft East Lothian LHS. Events were held in a variety of locations across East Lothian. These comprised large scale formal events, small focus groups tailored to the needs of individuals, full day drop in events, day and evening events etc. The events broadly covered four themes, including:

- **Housing Forums** – Three large scale full day Housing Forum events were held, to which over 200 stakeholders and their service users were invited. One event considered key housing issues and challenges across the county. Two events focussed on drafting priority outcomes and actions and a vision for housing in the LHS. An interactive options appraisal was carried out, with attendees encouraged to agree potential actions for the draft LHS, on the basis of identified issues and challenges. Two of the three events were advertised to the general public.
- **Vulnerable Groups** – Approximately 20 focus groups were held to consider the key housing issues and challenges in relation to vulnerable groups and potential actions for inclusion in the LHS. The events were widely publicised to the general public, carers, the third sector etc. targeting specific particular needs groups.
- **Community Planning** - Engagement with Community Planning is emphasised in Guidance, with a requirement for Community Planning Partners to agree to both the strategic direction of the LHS and their role in the delivery of key outcomes. A Community Planning event was held mid-2017 to raise awareness and consult with key stakeholders in relation to the Draft LHS.
- **Consultation on SESplan Housing Need and Demand Assessment 2 (SESplan HNDA2)** - Local Housing Strategy Guidance (2014) specifies joint working on certain aspects of LHS development. The Scottish Government and COSLA require Housing Market Partnerships to be established to consider how housing need and demand can best be met over housing market areas and across all tenures through consultation and engagement with partner local authorities. In 2014 a wider Housing Market Partnership was established comprising of around 300 organisations and groups across South East Scotland. A series of five large scale consultation events were held, to consult with the Partnership on housing need and demand, in addition to virtual events / surveys. Feedback received from the events was used to inform need and demand figures in SESplan HNDA2, the setting of Housing Supply Targets and Chapter Six of the Consultative Draft East Lothian LHS.

A comprehensive list of consultation events is set out at Appendix 1 of this paper.

4. Consultation and Engagement During Formal Consultation Period

The formal consultation period ran for a seven week period from Friday 19 January until Friday 9 March 2018. The Consultative Draft East Lothian LHS 2018-23 was highly publicised

and made available on the Council's website at the Consultation HUB. Survey questions were attached as follows, although respondents did not require to respond in this format:

1. Does the Consultative Draft LHS capture the key housing issues and challenges that we face across East Lothian? These are set out at the end of Chapters 5, 6, 7, 8, 9 and 10.
2. Do you have any comments on the draft vision for East Lothian? This is set out at Section 1.2 of the Consultative Draft LHS
3. Do you consider the six priority outcomes to be appropriate? These are set out at Section 1.2 of the Consultative Draft LHS
4. Do you consider the draft actions to be suitable in addressing identified issues? The actions are set out at the end of each Chapter (Chapters 5, 6, 7, 8, 9 and 10 and in the Action Plan, at Appendix 6
5. Do you have any comments on the Integrated Assessment? This is set out at Appendix 5 of the Consultative Draft LHS
6. Do you have any comments on the consultation process?
7. Do you have any other comments?

A link to the consultation was promoted via the Council's Facebook and Twitter accounts. An invitation to respond to the Consultative Draft East Lothian LHS was sent to members of the East Lothian Housing Forum (circa 200 members) and their service users. This comprises of a diverse range of statutory organisations, third sector organisations, tenants and residents etc.

Three informal drop-in events (see Table 1) were held across the key towns of Musselburgh, Prestonpans and Tranent, aimed at local communities, covering lunchtime, afternoons and early evening.

5. How Responses to the Draft LHS Have Influenced the Final LHS

All responses received through the formal consultation have been systematically considered and where appropriate, used to influence the LHS. This is set out at Appendix 2 'You Said... We Did'.

Appendix 1: Partnership Working, Consultation and Engagement to Inform the East Lothian LHS 2018-23

Date	Nature of Consultation / Engagement	Purpose	Attendees
Formal Consultation – Feedback Used to Inform Final LHS			
22 Feb 2018	Informal drop-in session, Tranent	Local residents invited to give their feedback on the draft Strategy	Not confirmed
20 Feb 2018	Informal drop-in session, Musselburgh	Local residents invited to give their feedback on the draft Strategy	Not confirmed
6 Feb 2018	Informal drop-in session, Prestonpans	Local residents invited to give their feedback on the draft Strategy	Not confirmed
Informal Consultation – Feedback Used to Inform Draft LHS			
25 Sept 2017	Housing Forum	Consultation event on draft priority outcomes / actions in LHS	28
21 Sept 2017	Housing Forum	Consultation event on draft priority outcomes / actions in LHS, to coincide with national Housing Day	12
29 Aug 2017	Area Partnership annual gathering	Presentation and discussion to raise awareness of the LHS, provide an update on the progress of the LHS 2018-23 and consider key issues	28
28 March 2017	Focus Group - Carers of East Lothian Port Seton – Mental Health	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for carers of individuals with mental health issues.	8
17 March 2017	Transforming Affordable Housing in East Lothian	Discussion session to consider innovation in delivery / alternative approaches, to inform strategic approach to affordable housing	20
22 Feb 2017	Focus Group - Carers of East Lothian	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for carers in Musselburgh.	9
22 Feb 2017	Meeting North Berwick Health and Wellbeing Network	Attendance at the North Berwick Health and Wellbeing Network to give an update on the progression of the LHS 2017-2022 and discuss potential consultations with the forum.	12
30 Jan 2017	Meeting - Looked After Young People	Meeting to provide an update on the progress of the LHS 2018-23 and discuss input from 'in-care' team.	1

24 Jan 2017	Focus Group - North Berwick Day Centre	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for older people.	16
11 Jan 2017	Focus Group - Action for Children, New Horizons Project	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for young adults experiencing homelessness & young adults who identify as LGBT.	6
17 Dec 2016	Focus Group - The Bridges Project	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for vulnerable young people.	6
12 Dec 2016	Focus Group - Criminal Justice Clients	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for adults with CPOs.	8
2 Dec 2016	Focus Group - CAPS	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for adults experiencing mental health issues.	7
30 Nov 2016	Focus Group Criminal Justice East Lothian Council Staff	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for criminal justice clients.	6
30 Nov 2016	Focus Group DFeL Peer Support Group	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for carers and individuals experiencing Alzheimer's.	5
25 Nov 2016	Meeting LGBT Youth Scotland	To gather information about the key challenges and issues with the housing system in East Lothian for young people who identify as LGBT.	1
25 Nov 2016	Meeting CAPS	Discussion to gather information and experiences of the key challenges and issues with the housing system in East Lothian for adults with mental health issues.	1
24 Nov 2016	Meeting – Dementia Friendly Scotland	To provide an update on the progression of the LHS 2018-23 and discuss potential consultation links with Dementia Friendly East Lothian.	1
24 Nov 2016	Focus Group - Blue Triangle (Wemyss House)	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for adults with complex needs experiencing homelessness.	6
23 Nov 2016	Focus Group - PASDA	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for carers of individuals with autism.	6
23 Nov 2016	Focus Group - Gypsy/Travellers	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian in relation to Gypsy/Travellers.	2
22 Nov 2016	Meeting - Autism Initiatives	Meeting to discuss the key housing challenges faced by individuals with autism and the best way to engage with the group for consultation.	1

21 Nov 2016	Focus Group - Alzheimer's Scotland	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for carers and individuals with Alzheimer's	10
10 Nov 2016	Focus Group - Action for Children New Horizons	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for young people experiencing homelessness.	4
9 Nov 2016	Focus Group – Blue Triangle (Milhill)	Discussion session to gather information and experiences of the key challenges and issues with the housing system in East Lothian for young people experiencing homelessness	8
26 Oct 2016	Housing Forum	Consultation event to consider key housing issues and challenges	35
25 Oct 2016	Rural Housing Event	Presentation and discussion session to consider key issues and challenges in relation to the delivery of affordable housing in rural areas	20
6 Oct 2016	Poverty event	Presentation and discussion session to consider key issues and challenges in relation to poverty in East Lothian and relationship with Housing	Not confirmed
Aug 2014	SESplan HNDA2 Consultation event	Consultation event to consider emerging issues and challenges and data in relation to housing need and demand	25
Jul 2014	SESplan HNDA2 Consultation event	Consultation event to consider emerging issues and challenges and data in relation to housing need and demand	40
Jul 2014	SESplan HNDA2 Consultation event	Consultation event to consider emerging issues and challenges and data in relation to housing need and demand	35
Jun 2014	SESplan HNDA2 Consultation event	Consultation event to consider emerging issues and challenges and data in relation to housing need and demand	30

Appendix 2: You Said, We Did...

Consultation Response	Action Taken / How Used to Influence Final LHS	Change to LHS
<p>1. We commend the significant dialogue between East Lothian Council and NHS Lothian’s public health professionals in developing the LHS and welcome the stated intention that the Council will undertake a Health Impact Assessment on the LHS. We recommend further engagement takes place with NHS Lothian to inform the forthcoming Health Impact Assessment before the final LHS is signed off.</p>	<p>Health Impact Assessment completed in conjunction with NHS Lothian and published as appendix of final LHS.</p>	<p>Yes</p>
<p>2. In advance of the Health Impact Assessment, further consideration takes place regarding how the LHS can influence health inequalities and promoting good health outcomes i.e. by expanding all the LHS strategic outcomes to highlight their anticipated impact on improving health or reducing health inequalities.</p>	<p>Consideration has been given to the LHS priority outcomes and their anticipated on improving health and / or reducing health inequalities highlighted. This has been used to inform a health impact assessment, which can be accessed at East Lothian Local Housing Strategy 2018-23, Supporting Paper 4 – Health Impact Assessment.</p>	<p>Yes</p>
<p>3. From a health perspective, we very much welcome the vision stated in the LHS which reads ‘healthy sustainable homes in vibrant communities that meet increasing levels of need, reduce inequalities and improve wellbeing across all stages of people’s lives’</p>	<p>N/A</p>	<p>No</p>
<p>4. We are really pleased to see the stated principles in the LHS that recognise that there is a critical link between good quality housing and good health and positively this recognition has been reflected throughout the whole LHS, not just in chapters relating to health and social care.</p>	<p>N/A</p>	<p>No</p>
<p>5. Strategic Outcome 3 regarding homelessness refers to good health outcomes. We would suggest that there are opportunities though for all the strategic outcomes and actions in the LHS to be expanded so that they describe their anticipated impact on improving health outcomes or reducing health inequalities. For example in the chapter regarding house</p>	<p>Consideration has been given to the LHS priority outcomes and their anticipated on improving health and / or reducing health inequalities highlighted. This has been used to inform a health impact assessment, which can be accessed at East Lothian Local Housing Strategy 2018-23, Supporting Paper 4 – Health Impact Assessment.</p>	<p>Yes</p>

condition, there could be some discussion about the negative impact that poor house conditions pose for health and health inequalities that may arise as a consequence of people and particular groups through their greater exposure to dwellings in poor conditions.		
6. We applaud the actions outlined in the LHS re the 'East Lothian Service for Integrated Care for the Elderly' to prevent hospital admission and reduce delayed discharge. We also welcome the aims to develop housing that meets varying needs and for there to be a more proactive culture in identifying adaptations.	N/A	No
7. The LHS demonstrates good understanding of the health and care needs of people with certain mental health conditions, learning disabilities and autism, and we welcome the LHS providing for small clusters of housing with support, in the community, to meet the housing and support needs of these groups.	N/A	No
8. We note the intention to develop a housing protocol between the Council and Scottish Prison Service and we would recommend that this plans for and provides access to tenancies for prisoners upon liberation. The LHS references the negative impact that unfurnished accommodations have on liberated prisoners and we would therefore recommend that access to temporary furnished accommodation is made available.	This will be a key component of the housing protocol, although no action required to LHS document	No
9. A specific section on women at risk of or experiencing domestic violence should be added.	Section added to LHS document	Yes
10. The needs of veterans are not considered	Section added to LHS document	Yes
11. Work on empty homes can achieve positive outcomes with regard to some themes which have been identified in the LHS as pertinent to East Lothian: <ul style="list-style-type: none"> • Bringing empty town centre properties back into use for affordable housing 	Information added to LHS document	Yes

<ul style="list-style-type: none"> • Increasing the supply of affordable housing in rural areas • Unlocking housing supply across all tenures • Helping improve the condition, energy efficiency and management of existing stock • Reducing carbon emissions through reuse of existing stock rather than new-build 		
<p>12. It is estimated there are approximately 375 long-term empty homes in East Lothian</p>	<p>Noted and reference to this added to the LHS document.</p>	<p>Yes</p>
<p>13. Recommendation to employ a permanent and dedicated Empty Homes Officer within the Council to tackle long-term empty homes within the East Lothian area.</p>	<p>There are currently limited resources available to employ a full-time Empty Homes Officer within East Lothian Council. However the Council does acknowledge that work on empty homes could be improved by taking a more strategic approach and this has been formally acknowledged in the LHS document as a key issue / challenge. A corresponding action has been included to 'prepare / implement a survey in relation to empty homes, analyse responses and provide recommendations' by December 2020.</p>	<p>Yes</p>
<p>14. The issues of lack of supply of affordable and social housing and 1/2 bedroom dwelling is made clear.</p>	<p>No action required</p>	<p>No</p>
<p>15. Very disappointed to see that the only mention of veterans gets an N/A response - no consideration at all of housing for veterans.</p>	<p>A section on veterans has been included.</p>	<p>Yes</p>
<p>16. Demand to housing is linked to supply, rather than accept a disproportionate population rise in the county, focussing on meeting current need would reduce future demand.</p> <p>The reason that East Lothian is a desirable county is due to the rural nature of much of the area and small, distinctive developments. Building all over the county will destroy this aspect of East Lothian. The large housing developments that are being proposed remove all distinctiveness from small settlements. East Lothian should have more affordable and social housing to meet the gaps currently identified, not large</p>	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p> <p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and</p>	<p>No</p>

<p>developments of 4 and 5 bed dormitory houses for people who work and socialise in the City of Edinburgh.</p>	<p>circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <p>The LDP allocates land where the principle of housing development would be acceptable. The LDP adopts a compact spatial strategy meaning housing land allocations are primarily concentrated within or close to existing settlements in the west of East Lothian. This is where the most accessible locations are found, these being closest to public transport routes, educational establishments, local amenities such as health care and retail, and infrastructure such as water and drainage. The LDP represents the settled view of the Council as to how East Lothian can and should grow sustainably in the next few years whilst complying with national policy.</p> <p>As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian.</p>	
<p>17. The strategy highlights the need for affordable housing and smaller homes, yet it is clear from current and forthcoming developments that 4,5 and 6 bedroom homes are the majority of those being built around the county. these are mainly edge</p>	<p>The draft LHS sets out an affordable housing target of 189 additional units per annum, recognising the importance of increasing affordable housing supply, given high levels of existing need and future projected demand. Recognising the importance of balanced communities, a market target is also set out of</p>	<p>No</p>

<p>of town/village developments which encourage car use. Unless the strategy is implemented it will be of no use whatsoever.</p>	<p>330 additional units per annum, equating to an affordable housing target of 36%.</p> <p>The LHS states that the primary requirement in relation to affordable housing is for social rented housing, although it is recognised that other affordable housing models are also required to meet need.</p> <p>A key action in the draft LHS is to 'Complete Supplementary Planning Guidance for Affordable Housing'. This states that a 25% affordable housing contribution will be sought from developers in relation to new housing developments consisting of five or more units as a minimum.</p> <p>The draft LHS also sets out an action 'maximise opportunities to accelerate affordable housing'.</p>	
<p>18. There is a disappointing lack of reference to the natural environment throughout the document. Wildlife are not taken into account in the strategy at all with reference to wildlife corridors or threats to habitats through development.</p>	<p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <p>The LDP was prepared with significant involvement from key agencies and infrastructure providers who, in general, endorsed the spatial strategy of the plan, subject to the delivery of key interventions identified. These agencies include Scottish Water, Transport Scotland, Network Rail and NHS Lothian. It was also informed by responses received during the various stages of public engagement in the process.</p> <p>The LDP was informed by Strategic Environmental Assessment (SEA) of sites put forward as proposals, the results of which led (in part) to site selection. Whilst there will be some loss of agricultural land through development, the majority of East Lothian remains undeveloped. There are also specific policies</p>	<p>No</p>

	<p>in the LDP to protect the unspoilt countryside and coast and to ensure that the landscape character of East Lothian is retained.</p> <p>The LDP includes a wide range of policies that, at project level, will inform decision making on individual planning applications. These include design policies to ensure that an appropriate range and choice of house types will be delivered on a site, with achieving the right tenure mix a key consideration. There are also policies covering the natural environment that will be used to maximise opportunities for green networks and habitats, and policies for the protection and enhancement of the historic environment.</p> <p>An East Lothian Climate Change Mitigation and Adaptation Strategy is currently being developed for the period 2018-28, which will address the impacts of housing development upon the natural environment.</p>	
<p>19. Building for the rich! Should be affordable housing for locals and first time buyers not for people coming from Edinburgh etc. to live more cheaply in E Lothian!!</p>	<p>The LHS acknowledges that house prices in East Lothian are expensive relative to other areas and that affordability is a key issue for many households. Priority Outcome 2 in the draft LHS is ‘The supply of housing is increased and access to housing improved across all tenures’. To reaffirm the commitment to increasing affordable housing, Priority Outcome 2 has been amended to read ‘The supply of housing is increased (including affordable housing) and access to housing improved across all tenures’.</p> <p>The LHS states that the primary requirement in relation to affordable housing is for social rented housing, although it is recognised that other affordable housing models are also required to meet need, such as mid-market rent and various models of low cost home ownership. Eligibility criteria is set for all tenures and a higher priority is given to those who live locally or have a local connection. Table 6.8 sets out new affordable housing completions during the previous five years, totalling 628 units, including 510 for social rent.</p> <p>The draft LHS also sets out an affordable housing target of 189 additional units per annum, recognising the importance of increasing affordable housing supply, given high levels of existing need and future projected demand.</p>	<p>No</p>

	<p>A key action in the draft LHS is to 'Complete Supplementary Planning Guidance for Affordable Housing'. This states that a 25% affordable housing contribution will be sought from developers in relation to new housing developments consisting of five or more units as a minimum.</p> <p>The draft LHS also sets out an action 'maximise opportunities to accelerate affordable housing'.</p> <p>In relation to the development of affordable housing for local people, applicants are required to submit evidence of their local connection to East Lothian to allow their application to progress.</p>	
<p>20. What a farce! Reduce inequalities! So why are houses costing over £250,000!! There are more expensive houses being built than affordable!! Disgrace!</p>	<p>Average house prices are set out in Table 6.13, with the North Berwick Coastal area showing average house prices at over £250,000 and other areas below £250,000.</p> <p>The LHS acknowledges that house prices in East Lothian are expensive relative to other areas and that affordability is a key issue for many households. Priority Outcome 2 in the draft LHS is 'The supply of housing is increased and access to housing improved across all tenures'. To reaffirm the commitment to increasing affordable housing, Priority Outcome 2 has been amended to read 'The supply of housing is increased (including affordable housing) and access to housing improved across all tenures. This includes different affordable housing tenures and East Lothian has recently delivered a number of discounted housing for sale ranging from £109,000 unit for a 2bed property to £159,000 a unit for a 3bed property. There are other models of low cost home ownership also being delivered by other affordable housing providers operating in East Lothian.</p> <p>The LHS states that the primary requirement in relation to affordable housing is for social rented housing, although it is recognised that other affordable housing models are also required to meet need. Table 6.8 sets out new affordable housing completions during the previous five years, totalling 628 units, including 510 for social rent.</p>	<p>No</p>

	<p>The draft LHS also sets out an affordable housing target of 189 additional units per annum, recognising the importance of increasing affordable housing supply, given high levels of existing need and future projected demand.</p> <p>A key action in the draft LHS is to 'Complete Supplementary Planning Guidance for Affordable Housing'. This states that a 25% affordable housing contribution will be sought from developers in relation to new housing developments consisting of five or more units as a minimum. The mix, form and type of affordable housing must be agreed with the council to ensure it is appropriate and meets the need.</p> <p>The draft LHS also sets out an action 'maximise opportunities to accelerate affordable housing'.</p>	
<p>21. As stated previous more housing for the rich!! Need more affordable housing but also need better infrastructure and public sector facilities- cannot keep building housing and it not having impact on local roads, GP surgeries, schools, parking etc...no one seems to care about these factors!!</p>	<p>The LHS acknowledges that house prices in East Lothian are expensive relative to other areas and that affordability is a key issue for many households. Priority Outcome 2 in the draft LHS is 'The supply of housing is increased and access to housing improved across all tenures'. To reaffirm the commitment to increasing affordable housing, Priority Outcome 2 has been amended to read 'The supply of housing is increased (including affordable housing) and access to housing improved across all tenures'.</p> <p>The LHS states that the primary requirement in relation to affordable housing is for social rented housing, although it is recognised that other affordable housing models are also required to meet need. Table 6.8 sets out new affordable housing completions during the previous five years, totalling 628 units, including 510 for social rent.</p> <p>The draft LHS also sets out an affordable housing target of 189 additional units per annum, recognising the importance of increasing affordable housing supply, given high levels of existing need and future projected demand.</p>	<p>No</p>

	<p>A key action in the draft LHS is to 'Complete Supplementary Planning Guidance for Affordable Housing'. This states that a 25% affordable housing contribution will be sought from developers in relation to new housing developments consisting of five or more units as a minimum. The draft LHS also sets out an action 'maximise opportunities to accelerate affordable housing'.</p> <p>With regard to infrastructure, consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each local authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes. The LDP was prepared with significant involvement from key agencies and infrastructure providers who, in general, endorsed the spatial strategy of the plan, subject to the delivery of key interventions identified. These agencies include Scottish Water, Transport Scotland, Network Rail and NHS Lothian. The effect of the planned new housing development on the transport network, education facilities, recreation facilities and healthcare facilities was examined in detail with these agencies and plans for appropriate additional facilities put in place. This process was examined by independent Reporters appointed by Scottish Government and this has concluded that a) the overall amount of land allocated for housing was sufficient with the exception of three small sites at Humbie, East Saltoun and Musselburgh</p>	
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	(Howe Mire) which were deleted, b) the Council's approach to planning a series of interventions to transport infrastructure and putting in place a system for collection of developer contributions towards these works, was the correct approach to planning for the transport infrastructure requirement of new development and c) the plan's role to identify where future development of health facilities are required was adequately dealt with.	
22. No easy to move around!! Roads are more congested, no thought out parking areas in town centres!! Towns becoming more congested with cars especially Haddington! Small towns cannot cope with increased volume of traffic!! A1 bad enough in the mornings now!!	<p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p> <p>As part of the preparation of its Local Development Plan the Council undertook a detailed transport appraisal to assess the impact of traffic on both strategic and local roads throughout East Lothian, including within Haddington. This study recommended a series of interventions to mitigate these impacts and these are planned for in association with the new development. Developers will contribute on a proportionate basis towards the cost of implementation of these measures.</p>	No
23. Need to stop building and spoiling E Lothian we have more than enough housing now!! No more!!	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p> <p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS</p>	No

	<p>recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <p>The LDP allocates land where the principle of housing development would be acceptable. The LDP adopts a compact spatial strategy meaning housing land allocations are primarily concentrated within or close to existing settlements in the west of East Lothian. This is where the most accessible locations are found, these being closest to public transport routes, educational establishments, local amenities such as health care and retail, and infrastructure such as water and drainage. The LDP represents the settled view of the Council as to how East Lothian can and should grow sustainably in the next few years whilst complying with national policy.</p> <p>As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian.</p>	
<p>24. There is no information on how this will affect public transport and what solutions will be put in place to improve an already creaking service.</p>	<p>As part of the preparation of its Local Development Plan the Council undertook a detailed transport appraisal to assess the impact of traffic on both strategic and local roads throughout East Lothian and on public transport. This study recommended a series of interventions to mitigate</p>	<p>No</p>

	<p>these impacts and these are planned for in association with the new development. Developers will contribute on a proportionate basis towards the cost of implementation of these measures.</p> <p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p> <p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p>	
25. Public transport needs to be included	As part of the preparation of its Local Development Plan the Council undertook a detailed transport appraisal to assess the impact of traffic on both strategic and local roads throughout East Lothian and on public transport. This study recommended a series of interventions to mitigate these impacts and these are planned for in association with the new development. Developers will contribute on a proportionate basis towards the cost of implementation of these measures.	No

<p>26. Much is required to support all of these new houses which will obviously equal an increased surge in population numbers.</p> <p>Infrastructure to support number of new houses.</p> <p>Medical centres & Dental practices very much needed to support increasing population.</p> <p>New Schools are essential & need to become priority if all these houses are being built.</p>	<p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <ul style="list-style-type: none"> • The LDP was prepared with significant involvement from key agencies and infrastructure providers who, in general, endorsed the spatial strategy of the plan, subject to the delivery of key interventions identified. These agencies include Scottish Water, Transport Scotland, Network Rail and NHS Lothian. The effect of the planned new housing development on the transport network, education facilities, recreation facilities and healthcare facilities was examined in detail with these agencies and plans for appropriate additional facilities put in place. This process was examined by independent Reporters appointed by Scottish Government and this has concluded that a) the overall amount of land allocated for housing was sufficient with the exception of three small sites at Humble, East Saltoun and Musselburgh (Howe Mire) which were deleted, b) the Reporters accepted the proposals in the LDP for planned expansion of educational infrastructure to cope with the forecast additional school rolls • c) the Council's approach to planning a series of interventions to transport infrastructure and putting in place a system for collection of developer contributions towards these works, was the correct approach to planning for the transport infrastructure requirement of new 	<p>No</p>
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	<p>development and d) the plan’s role to identify where future development of health facilities are required was adequately dealt with.</p> <p>The finalised LDP will be accompanied by an Action Programme to be regularly updated, to ensure the timeous delivery of infrastructure necessary to deliver housing allocations.</p>	
<p>27. Consideration of green space, not everyone wants to live in concrete jungles.</p>	<p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each local authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <p>The LDP allocates land where the principle of housing development would be acceptable. The LDP adopts a compact spatial strategy meaning housing land allocations are primarily concentrated within or close to existing settlements in the west of East Lothian. This is where the most accessible locations are found, these being closest to public transport routes, educational establishments, local amenities such as health care and retail, and infrastructure such as water and drainage. The LDP represents the settled view of the Council as to how East Lothian can and should grow sustainably in the next few years whilst complying with national policy.</p> <p>As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian. Planning Policies are also in place within the LDP to protect areas of open space within towns. Within new developments there are standards that must be adhered to for the provision of public open space and play and park facilities proportionate to the size of the proposed development.</p>	<p>No</p>

<p>28. In hand with increased housing other factors must be included such as infrastructure, schools, health & dental care provision for an increasing population.</p> <p>What's the point of providing housing if there are no provisions to support it?</p>	<p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <ul style="list-style-type: none"> • The LDP was prepared with significant involvement from key agencies and infrastructure providers who, in general, endorsed the spatial strategy of the plan, subject to the delivery of key interventions identified. These agencies include Scottish Water, Transport Scotland, Network Rail and NHS Lothian. The effect of the planned new housing development on the transport network, education facilities, recreation facilities and healthcare facilities was examined in detail with these agencies and plans for appropriate additional facilities put in place. This process was examined by independent Reporters appointed by Scottish Government and this has concluded that a) the overall amount of land allocated for housing was sufficient with the exception of three small sites at Humbie, East Saltoun and Musselburgh (Howe Mire) which were deleted, b) the Reporters accepted the proposals in the LDP for planned expansion of educational infrastructure to cope with the forecast additional school rolls • c) the Council's approach to planning a series of interventions to transport infrastructure and putting in place a system for collection of developer contributions towards these works, was the correct approach to planning for the transport infrastructure requirement of new 	<p>No</p>
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	<p>development and d) the plan's role to identify where future development of health facilities are required was adequately dealt with.</p> <p>The finalised LDP will be accompanied by an Action Programme to be regularly updated, to ensure the timeous delivery of infrastructure necessary to deliver housing allocations.</p>	
<p>29. Consultation could be wider spread over East Lothian rather than the 3 events listed.</p>	<p>A co-production approach was taken to developing the draft LHS and prior to the formal consultation, consisting of 3 drop in events, 32 events were held and used to inform preparation of the Consultative Draft East Lothian LHS, during the period June 2014 to December 2017. Events were held in a variety of locations across East Lothian. These comprised large scale formal events, small focus groups tailored to the needs of individuals, full day drop in events, day and evening events etc.</p> <p>No action required.</p>	<p>No</p>
<p>30. You have put in hundreds and hundreds of new houses. These residents are in the main commuting into Edinburgh. I sent you an FOI asking about what meetings have taken place between ELC and CEC. What I got back was bobildygook. You and CEC have done absolutely nothing to improve road links into Edinburgh. The North Berwick train is often so busy you cannot get on it at Musselburgh. My feedback would be you have made even worse the commute into Edinburgh and completely abrogated any responsibility for this. Your decisions have been reckless and irresponsible.</p>	<p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <p>The LDP was prepared with significant involvement from key agencies and infrastructure providers who, in general, endorsed the spatial strategy of the plan, subject to the delivery of key interventions identified. These agencies include Scottish Water, Transport Scotland, Network Rail and NHS Lothian. It was also informed by responses received during the various stages of public engagement in the process.</p> <p>The LDP allocates land where the principle of housing development would be acceptable. The LDP adopts a compact spatial strategy meaning housing land allocations are primarily concentrated within or close to existing settlements in the west of East Lothian. This is where the most accessible locations are found, these being closest to public transport routes, educational</p>	<p>No</p>

	<p>establishments, local amenities such as health care and retail, and infrastructure such as water and drainage. The LDP represents the settled view of the Council as to how East Lothian can and should grow sustainably in the next few years whilst complying with national policy.</p> <p>It recognises that East Lothian has geographic and economic linkages to the City of Edinburgh and that in some cases, people will choose to commute out of East Lothian for employment. However, the LDP also allocates land for employment use across the area as part of the overall upcoming growth. The provision of employment land aims to create local jobs and to reduce the need to commute.</p> <p>As part of the preparation of its Local Development Plan the Council undertook a detailed transport appraisal to assess the impact of traffic on both strategic and local roads throughout East Lothian and on public transport. This study recommended a series of interventions to mitigate these impacts and these are planned for in association with the new development. Developers will contribute on a proportionate basis towards the cost of implementation of these measures. Included among these transport interventions are planning for longer station platforms to support longer trains and planning for a series of transportation improvements at Musselburgh town centre. A study is ongoing at present into planning a network of active travel routes within Musselburgh to encourage a greater proportion of journeys to be made by walking and cycling within the town and a strategic cycle network is planned to encourage cycling between towns.</p>	
<p>31. I moved to East Lothian 10 years ago, and in general I think as a council you operate to a reasonable standard. In terms of these recent developments I think they have been irresponsible. You have ignored the transport / commuting implications of your additional house building. You have done nothing to improve the transport implications of your decisions.</p>	<p>As part of the preparation of its Local Development Plan the Council undertook a detailed transport appraisal to assess the impact of traffic on both strategic and local roads throughout East Lothian, including within Haddington. This study recommended a series of interventions to mitigate these impacts and these are planned for in association with the new development. Developers will contribute on a proportionate basis towards the cost of implementation of these measures at the time of their development.</p>	<p>No</p>

	<p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p>	
<p>32. In terms of the planning process around the redevelopment of Smeaton Bing / Carberry I would welcome a detailed review of this process by the council or the police. Starting with the original residents objects going 'missing' at council offices, and the refusal to reconsider the decision to redesignate the bing from green to brown allowing residents objections to be considered.</p>	<p>This is not considered to be a comment on the draft Local Housing Strategy, rather it refers to a planning application at Smeaton Bing / Carberry and has been forwarded to Council Heads of Service as appropriate.</p>	<p>No</p>
<p>33. The houses in most areas are already build, bit late?</p>	<p>The LHS covers existing housing in relation to energy efficiency; house condition and management of stock, where appropriate. The LHS also covers new housing supply, to meet our growing population and corresponding increase in need and demand for housing. There is still a significant amount of new build to be delivered across the county and the council will continue to secure the relevant contributions and ensure the most appropriate type of affordable housing is delivered.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes. While many of these houses have been built more are still to be constructed. The rates of construction are monitored by the Council and included on an annual housing land audit that is available on the Council's website.</p>	<p>No</p>

<p>34. Being born and brought up in East Lothian and still living and working here, this includes being a Director of a successful business , employing local people and attracting visitors into the area, I have strong concerns about the proposed growth of housing in our Council over the next decade.</p> <p>We are already witnessing large scale housing development in our existing towns and this whether we like it or not is changing the face of our landscape. I do not doubt the need for more housing in Scotland and East Lothian has to share its responsibility in this.</p> <p>My concerns lie in the stresses we can already see in our infrastructure, landscape and resources. To me there needs to be absolute consideration and study and investment made into key factors like , our road and transport networks, especially where large scale development are made in towns villages away from key road networks. The ability for Schools, Doctor surgeries, town high streets , parking ,drainage, sewage treatment community centres and rural public areas to handle of whats going to be an above national average housing growth.I agree Towns and Villages are designed to grow , but not at the exponential rate we have seen , or are going to see in the future.These large scale housing developments are characterless and offer little in architectural merit.</p> <p>I feel there is a huge shortfall in analysis and planning of the side affects of mass housing and this has to be a primary factor. The large developers should be forced to invest in the infracture their house developments are putting stain on. We also need to consider other industries that rely on our environment. As an example tourism is East Lothian is an under utilised industry with huge potential to develop. What will be the effect of mass house housing on our landscape, will our sea</p>	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as ‘robust and credible’ has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p> <p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p> <p>Consideration is being given to setting up a regional infrastructure forum to provide effective co-ordination of infrastructure planning at a regional level. The forum would bring together the six local authorities across South East Scotland (City of Edinburgh, the Lothian authorities, Scottish Borders and Fife Councils) and key infrastructure and utility providers including Scottish Water, SEPA, Transport Scotland, National Grid and more. The aim of the forum would be to collaborate to minimise disruption, align investment plans and to maximise the investment and economic impacts of development projects.</p> <p>The East Lothian Economic Strategy outlines the role of partners and the Council in supporting local businesses to start-up and growth, in generating inward investment and in promoting and marketing East Lothian as a destination for day and overnight visitors. East Lothian has a superb tourism offering, coast and countryside, that is actively promoted by the Council and</p>	<p>No</p>
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<p>side/market towns be desirable in the future to visit, or will they have lost their character. At the moment our Council is struggling to cope with the population we have, and cannot afford employ staff to do the simplest of actions like clearing litter from our verges.</p> <p>I worry about the future of our county and feel if the proposed housing pan goes ahead , the face our County and its towns has a good chance of being lost forever.</p>	<p>partners with increasing numbers of visitors shown. East Lothian’s town centres benefit from increasing numbers of residents accessing services and supporting the offering.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes.</p> <p>The LDP was prepared with significant involvement from key agencies and infrastructure providers who, in general, endorsed the spatial strategy of the plan, subject to the delivery of key interventions identified. These agencies include Scottish Water, Transport Scotland, Network Rail and NHS Lothian. It was also informed by responses received during the various stages of public engagement in the process.</p> <p>The LDP allocates land where the principle of housing development would be acceptable. The LDP adopts a compact spatial strategy meaning housing land allocations are primarily concentrated within or close to existing settlements in the west of East Lothian. This is where the most accessible locations are found, these being closest to public transport routes, educational establishments, local amenities such as health care and retail, and infrastructure such as water and drainage. The LDP represents the settled view of the Council as to how East Lothian can and should grow sustainably in the next few years whilst complying with national policy.</p> <p>It recognises that East Lothian has geographic and economic linkages to the City of Edinburgh and that in some cases, people will choose to commute out of East Lothian for employment. However, the LDP also allocates land for employment use across the area as part of the overall upcoming growth. The</p>	
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	<p>provision of employment land aims to create local jobs and to reduce the need to commute.</p> <p>All 441 unresolved representations to the LDP were submitted for examination by Scottish Ministers. This examination, broadly grouped into 34 issues, has now been completed and subject to some modifications, there are no outstanding/unresolved issues with the LDP including those previously raised in representations from key agencies. These included concern over the overall volume and location of housing and the infrastructure required to support this, including education, road and rail infrastructure. A number of representations raised the issue of capacity of medical facilities for the future planned development.</p> <p>The examination report can be viewed on the DPEA website (link) or on the Council's website (link). The Reporter concluded the following:</p> <ul style="list-style-type: none"> • The Reporter supported the compact growth strategy proposed in the LDP; • The overall amount of land allocated for housing was found to be sufficient with the exception of three small sites at Humble, East Saltoun and Musselburgh (Howe Mire) which were removed from the plan. A further site was added at Dunbar (Newtonlees); • Following examination of the detailed appraisals of the impact on transport infrastructure (road and rail) the Reporters concluded that the Council's approach to planning a series of improvements to this infrastructure and putting in place a system for collection of developer contributions towards these improvements, was the correct approach to planning for the infrastructure requirement of new development; • The Reporter accepted the proposals in the LDP for planned expansion of educational infrastructure • The Reporter agreed that the role of the LDP is to identify where future development of health facilities might be required, not to actually deliver the activities of NHS Lothian and found that the LDP contains sufficient 	
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	<p>detail to ensure NHS Lothian has sufficient space to accommodate projected population growth. With regard to health care provision the plan does this, as far as it can, through Proposal HSC2.</p> <p>This early engagement with key agencies and infrastructure providers during the LDP preparation allowed for the Council to have advance knowledge of where there would be pressure on existing infrastructure. Also, as part of the technical work which supports the LDP, various modelling was carried out to ensure that the development of sites allocated in the LDP (through intervention where required) was deliverable. These interventions include upgrades of key strategic/local road networks and public transport provision, new or extended educational facilities, and new or upgraded services such as health care. In some cases the Council will be directly responsible for the provision of additional facilities, and others will be delivered by external agencies. The Planning Service has worked closely with other Council Services to ensure that through collaborative working, existing communities will benefit directly and indirectly as a result of new housing provision. All proposals for housing development of five or more dwellings will be required to make financial contributions towards infrastructure provision in order for development to be considered acceptable. As previously noted, these contributions will include improvements to transport, education and community facilities. Whilst the exact contribution levels will be determined by the finalised Developer Contribution Framework Supplementary Guidance, these will each be agreed on a case-by-case basis including their delivery mechanisms.</p> <p>The examination of the LDP by Scottish Ministers concluded that the LDP allocates sufficient land to meet the SDP requirement and to ensure intervention and investment through S75 agreements can be delivered. In some cases, infrastructure providers were able to frontload funding of some infrastructure in the knowledge that costs could be recovered through planning obligations as part of the Development Management process. The</p>	
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	<p>use of Section 75 agreements will not however be used to address existing deficiencies in infrastructure.</p> <p>The housing land requirement set by the SDP does mean that there will be some change to the East Lothian landscape in the next few years. This is as a result of projected population increases creating a resultant demand for housing and associated services. The development of brownfield land was prioritised during the plan preparation process and the LDP supports conversions to existing buildings partly through the carry-forward of sites with live planning permission. However it must be recognised that East Lothian is constrained in terms of the amount of brownfield land remaining to be developed. Consequently, greenfield land was required in order for the LDP to meet the SDP housing land requirement.</p> <p>The LDP was informed by Strategic Environmental Assessment (SEA) of sites put forward as proposals, the results of which led (in part) to site selection. Whilst there will be some loss of agricultural land through development, the majority of East Lothian remains undeveloped. There are also specific policies in the LDP to protect the unspoilt countryside and coast and to ensure that the landscape character of East Lothian is retained.</p> <p>The LDP includes a wide range of policies that, at project level, will inform decision making on individual planning applications. These include design policies to ensure that an appropriate range and choice of house types will be delivered on a site, with achieving the right tenure mix a key consideration. There are also policies covering the natural environment that will be used to maximise opportunities for green networks and habitats, and policies for the protection and enhancement of the historic environment.</p> <p>All proposals for five or more dwellings will be required to provide a proportion of affordable homes, set at 25% of the total number of units. The LDP takes into account the wide range of housing tenures that can be considered affordable and the mechanisms used to secure their delivery. The aim is therefore to ensure that housing needs for all market sectors can be</p>	
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	<p>met. The acceptability of developer proposals for affordable housing will be assessed at project level through the Development Management process.</p> <p>As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian. Planning Policies are also in place within the LDP to protect areas of open space within towns. Within new developments, there are standards that must be adhered to for the provision of public open space and play and park facilities proportionate to the size of the proposed development.</p>	
<p>35. I disagree with outcome two, I feel the county cannot cope with the proposed scale of development and will be changed forever if it goes ahead. We are already seeing housing on a scale never seen before in East Lothian. I agreed with the other priorities.</p>	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p> <p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local</p>	<p>No</p>

	Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes. As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian. Planning Policies are also in place within the LDP to protect areas of open space within towns. Within new developments, there are standards that must be adhered to for the provision of public open space and play and park facilities proportionate to the size of the proposed development.	
36. Not enough attention is being given to housing for people with special needs and the abdication of responsibility to private landlords is costly and carries risk	The draft LHS action plan sets out approximately 100 actions, of which around 25% sit under Priority Outcome 4 – A wider range of specialist housing is provided to enable independent living where appropriate. This reflects the importance given to housing for people with special needs. No actions in relation to this group relate specifically to private rented housing.	No
37. Theme 3 is short in numbers in terms of 8 units. These units should be under Council control and not out sourced to private companies with the risk of another carrilion.	A comprehensive needs assessment has been carried out, to assess the housing needs of particular needs groups and the figure of 8 units per annum (total of 40 over the lifetime of the LHS) is considered to be appropriate in accordance with this evidence base. It has not been confirmed who will control these units, although at present it is likely units will be managed by the Council / East Lothian Health and Social Care Partnership.	No
38. The integrated assessment does not take into account the needs of special needs people in East Lothian, it does make mention but the council use of out sourcing always leaves an element of risk in private landlords withdrawing	The integrated assessment does take account of the needs of particular needs groups across the county and a specific health impact assessment has also been completed, emphasising the importance of this. The LHS sets out actions which are anticipated to improve relations with private landlords.	No
39. The use of private landlords to provide housing is expensive and at risk of businesses going wrong. Surely the Council can build houses that are adapted and can be shared and make best use of rent allowances.	The LHS states that the use of the Rent Deposit Scheme has decreased over recent years. One action of the draft LHS is to ‘conduct a scoping exercise to consider effective use of the private rented sector in preventing and alleviating homelessness, to include a review of rent deposit scheme and private sector leasing’.	No

<p>For example three people sharing a home on maximum rent allowance pay a private landlord some £22,000 in rent per annum even allowing for buying a house and running a business over a 30 year tenancy (easily achievable this is a £643,500 budget).</p> <p>A number of council owned houses would easily be run on this budget.</p> <p>Surely it is time for the council to take ownership and responsibility rather than outsourcing.</p>		
<p>40. The Council has a good understanding of housing demand in the area and consults well with partners on this issue. We note the following:</p> <p>Section 6.6. does not note the one form of tenure that is genuinely affordable - affordable rented homes. We have concerns that some of the other "affordable" tenures noted are affordable only to some, have limited or niche demand, and can create housing traps for people who are unable to move on from these types of tenures when their circumstances change. We are also concerned that tenures such as shared ownership can create future maintenance obligations for occupiers that they are unable to afford.</p> <p>We are concerned that the strategic partnership between the Council and ELHA is not being fully utilised to deliver new affordable homes. New RSL developers, including RSLs based in Dundee and Glasgow, are taking forward projects that could (and should) have been delivered by ELHA. Whilst any new affordable development is welcome, it is clearly preferable for their long term management to be as local to the area as possible, with priority being given to developments being taken</p>	<p>Social rented housing has been added to Section 6.6. The overarching priority for East Lothian Council is the delivery of social rent, although it is acknowledged that there is a need to deliver alternative tenures also.</p> <p>Eligibility criteria has been set to ensure that applicants for these alternative tenures as assessed to ensure affordability.</p> <p>There is no longer a formal strategic partnership in place between the Council and the RSLs, however Developers are required to discuss and agree the affordable housing requirement for individual sites with the council including the affordable housing provider. The Council will always prioritise local RSLs. Quarterly programme meetings are held with RSL partners operating in East Lothian and the Council consults on the SHIP and often seeks interest from those RSLs in relation to any new sites coming forward. Local RSLs also have a responsibility to bring forward new opportunities.</p>	<p>Yes</p>

forwards by the Council or ELHA, and not developer led, as appears to be the situation at present.		
41. As noted in the previous answer, the vision should include the local management of completed affordable homes wherever possible, and only consider new homes managed from further afield when there is no mechanism to develop them locally. This should be considered at the initial stages of planning and be clear in planning consents.	Agreed and this does happen. The new Supplementary Planning Guidance for Affordable Housing also clearly sets out the method for developers to agree their affordable housing contribution.	No
42. Again, as noted in previous answers, this should include an aspiration for affordable homes to be managed locally - in many ways this is more important for sustainability and community development than just chasing numbers or allowing the highest bidder to succeed.	The Council will always prioritise local RSLs. Quarterly programme meetings are held with RSL partners operating in East Lothian and the Council consults on the SHIP and often seeks interest from those RSLs in relation to any new sites coming forward. Local RSLs also have a responsibility to bring forward new opportunities.	No
43. Action Plan, page 144 - engagement with stakeholders - priority should be given to engaging with stakeholders who are able to demonstrate long term local management of new affordable homes Action Plan, page 150 - housing for older people - ELHA are keen to engage with ELC on the development of this strategy, again to ensure that provision is not unnecessarily developed by geographically distant RSLs An Action Plan task could be included to look at how joint work between ELC and East Lothian Care & Repair could improve the delivery and management of adaptations across all tenures	The Council will always prioritise local RSLs. Quarterly programme meetings are held with RSL partners operating in East Lothian and the Council consults on the SHIP and often seeks interest from those RSLs in relation to any new sites coming forward. Local RSLs also have a responsibility to bring forward new opportunities. East Lothian Council would welcome further discussion with ELHA. A Housing Thematic Group will be set up during 2018/19 to enable delivery of the East Lothian LHS 2018-23 in relation to specialist provision and key staff from ELHA will be invited to attend this group. The LHS includes an action to 'Review existing adaptations processes to ensure they are efficient and effective'. East Lothian Council would welcome a joint working approach to this and further discussion with East Lothian Care & Repair.	No
44. This appears to be a comprehensive assessment.	No action required	No
45. We have some concerns about the tone of language used in the document towards Universal Credit. Whilst we share concerns about some aspects of the administration of the UC service (and in particular recognise the hardship this has	East Lothian Council recognises that Universal Credit is an evolving benefit and does not seek to take a view regarding whether it is a negative or positive system. What the LHS does present is evidence of the effects that Universal Credit has had on tenants, residents and the housing system in East Lothian.	No

<p>resulted in in some individual cases), there are many positive aspects of the new system, particularly in a rural area like East Lothian with changing income levels and individual circumstances.</p> <p>Like the Council, ELHA continues to work closely with the DWP who we have found to react positively to issues we have raised and are proactively developing solutions. UC is not going to disappear and it is important that we continue to work constructively with the DWP on its development, and to recognise too that it is replacing a benefits system that is no longer fit for purpose and also causes hardship in individual cases.</p> <p>ELHA has continually opposed welfare benefit cuts, but these should not be confused with the reform of the benefits system and the introduction of Universal Credit as a service.</p>	<p>The LHS promotes continued engagement with the DWP and council departments to mitigate any negative effects from UC and support tenants as they adapt to the new benefit.</p>	
<p>46. The process is structured and well organised.</p>	<p>No action required</p>	<p>No</p>
<p>47. Too many houses planned on greenfield land. We should be using brownfield land or knocking down old buildings to build new houses.</p>	<p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes. As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian. Planning Policies are also in place within the LDP to protect areas of open space within towns. Within new developments, there are standards that must be adhered to for the provision of public open space and play and park facilities proportionate to the size of the proposed development.</p>	<p>No</p>

	<p>The housing land requirement set by the SDP does mean that there will be some change to the East Lothian landscape in the next few years. This is as a result of projected population increases creating a resultant demand for housing and associated services. The development of brownfield land was prioritised during the plan preparation process and the LDP supports conversions to existing buildings partly through the carry-forward of sites with live planning permission. However it must be recognised that East Lothian is constrained in terms of the amount of brownfield land remaining to be developed. Consequently, greenfield land was required in order for the LDP to meet the SDP housing land requirement.</p> <p>The LDP was informed by Strategic Environmental Assessment (SEA) of sites put forward as proposals, the results of which led (in part) to site selection. Whilst there will be some loss of agricultural land through development, the majority of East Lothian remains undeveloped. There are also specific policies in the LDP to protect the unspoilt countryside and coast and to ensure that the landscape character of East Lothian is retained.</p> <p>The LDP includes a wide range of policies that, at project level, will inform decision making on individual planning applications. These include design policies to ensure that an appropriate range and choice of house types will be delivered on a site, with achieving the right tenure mix a key consideration. There are also policies covering the natural environment that will be used to maximise opportunities for green networks and habitats, and policies for the protection and enhancement of the historic environment.</p>	
<p>48. We should not need to build as many houses on land which has a much better use currently</p>	<p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes. As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network</p>	<p>No</p>

	<p>throughout East Lothian. Planning Policies are also in place within the LDP to protect areas of open space within towns. Within new developments, there are standards that must be adhered to for the provision of public open space and play and park facilities proportionate to the size of the proposed development.</p> <p>The housing land requirement set by the SDP does mean that there will be some change to the East Lothian landscape in the next few years. This is as a result of projected population increases creating a resultant demand for housing and associated services. The development of brownfield land was prioritised during the plan preparation process and the LDP supports conversions to existing buildings partly through the carry-forward of sites with live planning permission. However it must be recognised that East Lothian is constrained in terms of the amount of brownfield land remaining to be developed. Consequently, greenfield land was required in order for the LDP to meet the SDP housing land requirement.</p> <p>The LDP was informed by Strategic Environmental Assessment (SEA) of sites put forward as proposals, the results of which led (in part) to site selection. Whilst there will be some loss of agricultural land through development, the majority of East Lothian remains undeveloped. There are also specific policies in the LDP to protect the unspoilt countryside and coast and to ensure that the landscape character of East Lothian is retained.</p> <p>The LDP includes a wide range of policies that, at project level, will inform decision making on individual planning applications. These include design policies to ensure that an appropriate range and choice of house types will be delivered on a site, with achieving the right tenure mix a key consideration. There are also policies covering the natural environment that will be used to maximise opportunities for green networks and habitats, and policies for the protection and enhancement of the historic environment.</p>	
49. Sounds good but will the reality be anywhere near this?	The LHS sets out the vision for housing by 2023 and a number of actions are set out in order to achieve this. An annual review will be carried out to assess	No

	progress in relation to actions, priority outcomes and the overall vision. No action required	
50. I think the danger of too much building will be swamping the local communities into a huge Edinburgh conurbation. Where are the jobs for the people in these houses?	The economic strategy of East Lothian is to create and grow businesses, with local jobs a key target. There will be job creation as a result of house building whether directly in construction or indirectly through servicing and improving the build. The Council will continue to work with investors to bring new jobs to the county and with existing businesses to support their growth.	No
51. My worry is that the plans are too big. Too many houses being built so existing communities overwhelmed. Not enough jobs to support people living in the houses.	The economic strategy of East Lothian is to create and grow businesses, with local jobs a key target. There will be job creation as a result of house building whether directly in construction or indirectly through servicing and improving the build. The Council will continue to work with investors to bring new jobs to the county and with existing businesses to support their growth. No action required	No
52. You appear to have decided already on building vast numbers of houses. Some building is needed and refurbishment of existing properties is a priority. However, building houses in huge numbers filling swathes of East Lothian is not justified by the jobs available in the area. Where are these people going to work?	A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum. At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016. It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.	No

	The economic strategy of East Lothian is to create and grow businesses, with local jobs a key target. There will be job creation as a result of house building whether directly in construction or indirectly through servicing and improving the build. The Council will continue to work with investors to bring new jobs to the county and with existing businesses to support their growth.	
53. Skims over the massive issue of private sector renting. Also hints that this is a suitable alternative to social renting.	<p>The LHS acknowledges that there has been a sizeable increase in the private rented sector and that effects of a constrained housing systems has resulted in low income households accessing the PRS as a long term option. The LHS states that this has implications on poverty levels throughout the country.</p> <p>‘Key Issues and Challenges’ in relation to Priority Outcome 2 recognises the issues associated with the private rented sector, particularly issues around affordability.</p>	No
54. A single parent will have to earn over 30k to be non-reliant of benefits to be afford a 2 bed private rent. Are there many of these in East Lothian?	<p>The LHS acknowledges the expensive nature of the Private Rented Sector and the challenges that changes to the welfare system has brought in terms of affordability.</p> <p>In a bid to address this, a key action in the draft LHS is to ‘consider applying to Scottish Ministers for the designation of a rent pressure zone’.</p> <p>Priority Outcome 2 in the draft LHS is ‘the supply of housing is increased (including affordable housing) and access to housing improved across all tenures’. An affordable housing target of 189 additional units per annum is set out, which recognises the importance of increasing affordable housing supply in the county.</p>	No
55. An ex-convict fresh out of jail has more priority to social housing than a family private renting living in poverty as they are paying 60% of income on huge rents.	<p>The LHS recognises that there is an increasing demand on the housing register from homeless applicants. However, no specific group defined as homeless has priority over social housing.</p> <p>The LHS states that East Lothian Council’s housing allocations policy is currently being reviewed to help address homelessness and housing pressures.</p> <p>The LHS also acknowledges issues of affordability and the implications in the Private Rented Sector. Priority Outcome 2 in the draft LHS is ‘the supply of</p>	No

	housing is increased (including affordable housing) and access to housing improved across all tenures'. In a bid to address issues of affordability, a key action in the draft LHS is to 'consider applying to Scottish Ministers for the designation of a rent pressure zone'.	
56. Build more social homes. Private renting isn't the answer affordable housing isn't the answer.	<p>The LHS acknowledges that house prices in East Lothian are expensive relative to other areas and that affordability is a key issue for many households. Priority Outcome 2 in the draft LHS is 'The supply of housing is increased and access to housing improved across all tenures'. To reaffirm the commitment to increasing affordable housing, Priority Outcome 2 has been amended to read 'The supply of housing is increased (including affordable housing) and access to housing improved across all tenures'.</p> <p>The LHS states that the primary requirement in relation to affordable housing is for social rented housing, although it is recognised that other affordable housing models are also required to meet need. Table 6.8 sets out new affordable housing completions during the previous five years, totalling 628 units, including 510 for social rent.</p> <p>The draft LHS sets out an affordable housing target of 189 additional units per annum, recognising the importance of increasing affordable housing supply, given high levels of existing need and future projected demand.</p> <p>A key action in the draft LHS is to 'Complete Supplementary Planning Guidance for Affordable Housing'. This states that a 25% affordable housing contribution will be sought from developers in relation to new housing developments consisting of five or more units as a minimum.</p> <p>The draft LHS also sets out an action 'maximise opportunities to accelerate affordable housing'.</p>	No
57. Sounds good, but is just meaningless dribble. Define a healthy home or a sustainable home in terms that the majority of people would recognise and agree on.	The draft LHS sets out a commitment to carrying out a health impact assessment, prior to publication. This ensures that positive and negative impacts of the proposed actions are given appropriate consideration. Around 50 health aspects are identified and considered through this exercise in	Yes

<p>What a vibrant community is to an 18 year old or an 88 year old is likely to be completely different.</p> <p>In fact the only meaningful phrase is that it "meet increasing levels of need".</p>	<p>relation to 'healthy homes', many of which people would recognise and agree on i.e. heating affordability; warmer and safer homes; physical activity; physical health and mental health; winter mortality; falls, hazards and home safety; respiratory health; environmental quality; greenspace and play facilities.</p> <p>East Lothian Council and its partners seek to promote sustainable and mixed communities, developing a range of affordable housing to match local needs. The draft LHS includes an action to 'Develop a Local Investment Framework to improve knowledge and understanding of local areas. This information will be used to ensure a balance of affordable tenures / house types is delivered on all new proposed developments'. It is anticipated the Local Investment Framework will help to create a balanced mix of different household types, taking age into account and also including vulnerable groups.</p>	
<p>58. Priority 1 - Is meaningless and cannot be measured. Sustainability in housing, lies mainly with the Building Regulations, in that they determine the energy efficiency, thermal values, and even whether or not the building materials are from sustainable and local sources.</p> <p>Responsibility for minimising environmental impact and for communities is with Planning.</p>	<p>The Environmental Assessment (Scotland) Act 2005 requires local authorities to carry out a strategic environmental assessment (SEA) for certain strategies and plans. This enables consideration of potential impacts upon the environment, promoting sustainable development.</p> <p>While it was formally determined that a SEA was not required for the LHS following a screening exercise in 2016, the Climate Change (Scotland) Act 2009 requires public bodies to work towards incorporating the principles of sustainability into their decisions and actions. The Council and its partners recognise the importance of adhering to the principles of sustainability and this is reflected accordingly in the LHS. The potential environmental impacts of the LHS upon the wider community have been considered within the Integrated Impact Assessment, promoting equality, human rights and sustainability, located at East Lothian Local Housing Strategy 2018-23: Supporting Paper 3 – Integrated Impact Assessment. This ensures the principle of sustainability underpins all aspects of the LHS.</p> <p>Local authorities have a statutory duty to prepare a Local Housing Strategy, comprising the sole strategic document for housing. This must include issues</p>	No

	<p>and challenges; the strategic approach and actions in relation to energy efficiency and housing standards.</p> <p>Scottish Government LHS Guidance (2014) states ‘it is important that the LHS supports and helps to deliver national outcomes and targets i.e. the Regeneration Outcomes Framework. One of the four outcomes of this document is ‘sustainable communities’.</p> <p>http://www.gov.scot/About/Performance/scotPerforms/partnerstories/HARO</p>	
<p>59. There are far, far too few affordable housing units. I believe that current figures is supposed to be 17.5%, although other Councils set far higher targets. In addition, while great emphasis is placed on social need. If you wish to help create and maintain "vibrant" communities, you need to set targets for the right mix of young and old; poor, middle and wealthy households; along with those that have special needs. Currently, the private sector are only delivering homes for middle and wealthy. There is a desperate need for homes suitable for the many single people (young and old).</p>	<p>The LHS acknowledges that house prices in East Lothian are expensive relative to other areas and that affordability is a key issue for many households. Priority Outcome 2 in the draft LHS is ‘The supply of housing is increased and access to housing improved across all tenures’. To reaffirm the commitment to increasing affordable housing, Priority Outcome 2 has been amended to read ‘The supply of housing is increased (including affordable housing) and access to housing improved across all tenures’.</p> <p>The LHS states that the primary requirement in relation to affordable housing is for social rented housing, although it is recognised that other affordable housing models are also required to meet need. Table 6.8 sets out new affordable housing completions during the previous five years, totalling 628 units, including 510 for social rent.</p> <p>The draft LHS also sets out an affordable housing target of 189 additional units per annum, recognising the importance of increasing affordable housing supply, given high levels of existing need and future projected demand. With a corresponding market housing target of 330 units, this equates to an affordable housing target of 36%.</p> <p>East Lothian Council and its partners seek to promote sustainable and mixed communities, developing a range of affordable housing to match local needs. The draft LHS also includes an action to ‘Develop a Local Investment Framework to improve knowledge and understanding of local areas. This</p>	<p>No</p>

	information will be used to ensure a balance of affordable tenures / house types is delivered on all new proposed developments'. It is anticipated the Local Investment Framework will help to create a balanced mix of different household types, including vulnerable groups.	
60. Like the Consultation Hub, but was unable to navigate from the Council's own website to it.	Comments have been passed onto the appropriate Council Team, dealing with the website although no action required in relation to the LHS document.	No

<p>61. At a high level the draft captures some of the critically important housing issues and challenges. In particular place making, infrastructure, inequalities and related services. You identify the importance of increasing numbers of very old people; rural and transport issues, workforce and care provision and numbers of couples and so on. It also identifies the shortage of appropriate housing options for older people and people with particular care needs.</p> <p>Recognition of the importance of the Planning Framework and place making is also very welcome as it is essential to ensuring the houses play their full role in our lives and policy and planning priorities and support Ageing in Place approaches.</p> <p>My particular concerns are round the need for a better analysis of dementia and the implications of an ageing population, particularly longer term. The analysis around age and ageing and in particular older people and people with dementia and care-partners requires urgent attention and further development if it is to support effective and appropriate decision-making and planning round housing and 'related services'. These issues are under-developed.</p> <p>Also, whilst the strategy acknowledges that it is more than housing, it must more clearly recognise the critical psychological, social and economic importance of houses as homes, and home as a resource and asset for people over the life course. Home and housing are critical in supporting wider aims of prevention and promoting independence, social health and quality of life. These issues are not addressed in the strategy, even though it is described as the 'sole strategic document for housing'. Accessing and utilising personal and community assets is critical to prevention and reducing</p>	<p>This consultation response has seven key themes which express concern for;</p> <ol style="list-style-type: none"> 1) A strategy that last 5 years and does not give a long term vision. 2) The lack of attention to dementia in the strategy 3) Older people being rendered to a 'particular needs category' and not considered through-out the strategy. 4) That the use of technology is not given ample attention 5) Concerned that Ageing in Place is not considered enough. 6) The consultation which the response felt was lacking when concerned with dementia. 7) The town centre section not connecting to communities and how local people are able to utilise them. <p>These seven statements are addressed as follows:</p> <ol style="list-style-type: none"> 1) The Local Housing Strategy is a 5 year document which brings together a wide range of housing related priorities into one place to enable a co-ordinated response. It is a statutory duty to publish a five-year Strategy for housing and review annually. This limits the extent to which the LHS can produce a longer term strategy. The actions noted in the LHS will inform future direction, and the outcomes they produce along with new evidence (which is constantly changing and improving) will ensure housing strategies stay up to date and continue to be informed by evidence. The LHS does not sit in isolation and links to many East Lothian Council strategy documents which provide longer term visions for East Lothian. This includes the East Lothian Plan 2017-27, which has a particular focus on inequalities and the Local Development Plan (2016). 2) It is acknowledged that the Local Housing Strategy does not give adequate attention to people with dementia. The draft LHS has been updated to include 'people with dementia' within the older people section of the 'particular needs/ section. Within this section, it 	<p>Yes</p>
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demand on public services longer term. It is the key culture change issue for ELC staff and communities.

The draft has the potential to be a very effective framework if aspects are developed. It needs further analysis and development round these issues and a clearer link between the vision and actions, it's not always clear how an action will deliver the desired outcomes.

I am focussing on where I think the strategy can be strengthened, please don't take this as being negative, just lack of time!

1. Lack of inclusion of people with dementia and carers
I am particularly disappointed at the lack of coverage of dementia and housing. Despite the growing number of people living with dementia, many of whom will be older and cared for by equally old partners, dementia is only partly addressed as an issue. The strategy ignores the importance of the rights of people with dementia as citizens to access suitable housing options to meet their needs and impairments. There is a focus on physical issues and not housing designed for and/or adapted for cognitive housing, assistive technology, visual impairment. Many and possibly increasing numbers of people with dementia and of course many carers are not old or 'retirement age' but are working and have families they care for.

2. Concept of ageing needs more development
There is a more general problem with how ageing is understood in the draft strategy and the implications this has for identifying and addressing housing issues and opportunities round an ageing demography. This is fundamental to building homes for a changing society and to recognise that we are building for future generations and their old age too. This

touches on the experience of carers and housing. Accordingly, specific actions have been added / amendments made to existing actions

3) Older people's housing is addressed in two ways within the LHS. The LHS recognises that the proportion of older people in East Lothian is expected to rise significantly over the next two decades, that older people are living for longer, with a corresponding rise in healthy life expectancy and that more older couples is projected to be a trend in future. The LHS has thus incorporated an ageing society into all key themes. There are two ways in which this is achieved:

The first is by stating all mainstream housing should be future-proofed and a culture of pro-active preventative approach to adaptations should be promoted. The LHS does not intend to imply that all older people will require 'specialist housing'. A key action of the LHS is to 'ensure mainstream accommodation is future proofed as far as possible, built to a standard to accommodate wheelchair users and capable of being adapted to suit a range of needs.'

Secondly, by including 'older people' in the 'particular needs' chapter, the LHS is acknowledging that a proportion of older people in East Lothian will require specialist care in later life due to factors dementia, disabilities and other conditions whose prevalence tends to increase with age.

4) The final LHS includes a specific section on technology enabled care.

5) 'Ageing in Place' is a concept which can be defined in a number of different ways; it is the process of 'ageing at home rather than in a home' and/or 'the desire to remain in one's own dwelling'. The LHS seeks to promote home living as much as possible for older people as well as people with older physical and mental health needs. It is recognised that the ability to 'age in place' also has implications on

obviously links to the vision.

A major problem in identifying housing issues in the draft is lumping everyone over 60 as an older person in most of the analysis, talking about 'retirement age' and describing all housing options for older people as 'specialist housing'. A changing demographic doesn't just mean more older people, it means a transformation in the structure and culture of society. There will be a significant increase in very old people many of whom are living with long term conditions, disabilities etc. Describing everyone over 60 as older is like lumping together 1 - 40 year olds. Whilst there is some recognition of the need to look at different ages in the strategy, planning housing for a growing number of people aged 75 plus, 85 plus and 95 plus needs to link to an analysis of what housing options and choices and 'related services' they might require. There are significant differences between the aspiration of different cohorts - digital access will be more essential than a landline for future older people. There is an Age UK report on this which looks at evidence base for a range of options on services for the oldest old.

Stop talking about specialist housing for older people
An ageing population means that meeting the needs of very old people is not specialist, it is the norm. We need innovative solutions not different types of sheltered housing, again linking back to the vision. We also need to be looking at housing which meets the Ageing in Place standards, this will also help to make the link between housing and place making which the strategy aspires too much clearer and more concrete. I cannot see this link manifest in the draft strategy or the options proposed.

Support self-management and planning ahead

other aspects of community and society i.e. local transport options, access to shops and activities. This is in part the reasoning why for the first time, the LHS has included a chapter on strategic priorities of creating 'Sustainable and Vibrant Communities' in East Lothian.

- 6) The following consultations were held with regards to older people, dementia and carers.
 - Focus group with Carers of Musselburgh (which included carers of people with dementia, physical disabilities and mental health problems)
 - Focus group with Alzheimer's Scotland. Participants included individuals with dementia and their carers
 - Meeting with Dementia Friendly East Lothian
- 7) It is considered that this is covered under existing actions.

<p>Recognised in plan but needs more development and emphasis. Housing issues include the need to support people to plan ahead over the life stages and to offer viable options, research shows that people plan ahead if they can. For current older people there is basically a cliff edge before you go into a care home or sheltered housing, few people have viable options for managing their decisions about home ahead, yet they want to. The need for housing advice is recognised, this is critical, people need help to know and navigate choices. It needs developed further and resourced. The point about couples needs further thought, requiring more bedrooms (carers cannot always share rooms) and the potential for live in care and support from family carers who live some distance away and need to stay over, especially at critical an crisis times.</p> <p>Utilise Digital and AT resources - mainstream not as care. There is a particular role for assistive technology and adaptations which is partly recognised in the draft but needs developed. Adaptations and AT enable people not just to stay physically in their house but psychologically attached to their home, relationships and community. This is critical in ensuring people live independently, reducing 'carer strain or burden' and so QOL and prevention. Dementia Friendly East Lothian is currently working with a local designer to look at how design solutions can help people adapt their homes to changing needs and retain a sense of home.</p> <p>If adaptation and AT are to work they need to be done in ways that do not stigmatise or undermine a sense of home. They need to focus in helping people live the lives they want and making their own choices not just offering clunky badly designed and ugly aids that people are embarrassed about, sometimes ever not letting friends visit because of the stigma.</p>		
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This needs to be take forward in partnership with people of all ages and innovators, local authorise and health nee to draw on the important contribution of designers and others. The strategy sets out a really important vision for housing and related services with important links and values. The link with planning and place making is essential for housing to enable people to live quality independent lives at all ages for as long as possible, it's what people want and essential if we are to manage the opportunities and challenges of longer living humans. Plus the vision places housing in the wider context of transport, place making etc. I was also pleased to see attention to inequality, intergenerational thinking, collaboration and a life stages approach and reference to community connections, healthy ageing and social health

However the vision needs to be more explicit and ensure there is a very clear longer term framework within which this 5 year strategy sits. The vision needs to be explicitly longer than 5 years and recognise we are building for future generations and the older people and children of the future. The vision needs to address the needs and interests of our future older people who won't have the finances or house owning experience they will need. Social isolation should also be addressed in anticipation of the future strategy.

As is acknowledged, it is critical we change mindset and culture and look at housing in a completely new way. We're in a process of adapting to the convex and transformative challenge of an ageing population and the Vision could go further in promoting and inspiring new thinking and innovation.

The way we plan and build houses now creates problems, including social isolation, inequality, reduced physical,

psychological and social health; poor access to amenities and services unless you have a car etc. These exacerbate and enhance the negative impact and symptoms of dementia creating demand for services and carer-burn out. ie creating preventable demand and costs.

The vision could spell out more strongly the fundamental importance of housing to the quality of life for everyone and as a strategic policy that supports prevention, quality of life and helps manage demands for services. There needs to be more emphasis on peacemaking as part of the strategy - and linking to decisions about transport, greenspace, services, work ec. Locating housing policy in an Ageing in Place framework enables you to make those links in a coherent way.

A clearer future focus in the vision section would help. For example how does this 5 year strategy help us develop longer term solutions, eg Cognitive and agile housing, innovative and diverse housing choices for for older living, enabling people to age well at home. And more on digital solutions, including AT, retro fitting, with healthy living for life technology as the norm. There is considerable stigma round the use of AT provided through social services when these are increasingly tools we all use to manage life as we get older. This needs to be clearer in the strategy so people can live at home longer and manage resources and save money long term.

The vision should also make reference to the fact that ageing is changing, Different cohorts have very different expectations and aspirations. They will make different decisions about work, retirement (many cannot retire at 60 due to changes in state pension) family responsibilities and role; inter-generational (IG) contracts are changing too. Agile housing is also key- there are estimates that downsizing and reduced mobility and

participation costs the NHS billions, plus H&SC costs - these costs could be prevented by a more effective approach to housing. The vision should include these types of issues and the plan should have some actions that start to move us in this direction.

Excellent to see inequalities recognised, would be strengthened by a long term, preventative focus. Inequalities of all types are built up over a life time and transmit to future generations. Inclusive growth managing public services longer term require firm attention to inequality and housing access is critical to long term physical psychological social and economic health.

Need to consider how the town centre fits policy meets the needs of older people and people with dementia and their ability to access community resources. Especially if 'specialist housing' means people are housed in age-specific provision on the outskirts of towns with limited access and likely to be excluded from the full life of the community. If you are going to have 1 town centre and in NB there seems to be no scope for former specialist housing in the centre, transport has to be addressed. Many people with dementia will eventually give up driving as will want of our oldest old. How will they benefit?

1. Community is critical good to see, but not addressed in strategy so don't see how proposals will achieve this. Need to have an Age In Place and better link to Placemaking in the strategy so the link is clear. How will this strategy create and maintain sustainable and vibrant communities? For older people and people with dementia and carers, especially they seem to be dealt with separately and not seen as citizens with rights to housing options should work for them. Just building houses can undermine communities without due consideration

of transport, amenities, town centres etc.

2. The critical thing is what is supplied and who is able to access housing. Here supply for older people and people with dementia is designated as specialist housing rather than creating housing options for the new norm of an ageing population and looking beyond physical access to cognitive and agile housing that truly delivers the benefits of housing for people, social health and resilient communities. Affordability is addressed but only with respect to first time buyers, there is no discussion of what affordability means for people making important housing choices at different life stages. Need to look at supply and access housing and adaptations over the life cycle as families change and move and people adapt to what life brings. We need creative housing options and choices so people can manage their sense of home over life cycle wherever they actually live. They need viable options that enable them to have QOL as active members of the community etc. Houses are a means to an end not the end in themselves and this needs to be a core part of assessing supply and access.

3. Homeless is really important but need to accept that as for younger people, older people in inadequate or unadapted housing is not acceptable.

4. Specialist Housing - I have made the point above that thinking of housing for 60 plus and older as specialist misses the point about an ageing demographic, there is a new norm and we need innovative housing solutions to meet it now and for future generations. Obviously too much to do in the short term ie 5 years but this strategy should start us off on that journey and look at doing something innovative and the vision should be clear about this. There is lots of new build going on,

lots of opportunities to learn and begin to test and develop models. We need a wider range of housing and care options, innovative and creative solutions that develop housing options and choices for all ages. I am not specialist in YP but wonder how their needs are being met by this strategy.

5. Stock - see above about agile and cognitive housing, digital and AT, need for retro fit; adaptations, getting people to plan ahead and have the tools to do so. A lot of this can be done by community and local business, help get us to a mindset where we plan ahead. Good to see link to housing advice etc targeted at 50/60 where evidence suggests that many folk are looking at options. Strategy should get us started and change the mindset here - not just community alarms etc. what happened to Well Wynd?

6. Of course fuel and energy - all the above apply here too. Getting people out and active in later years is a good way to save energy too. another benefit of community.

There is a gap between vision and action and the need for the vision to provide a clearer long term and innovative framework for the proposals for the next 5 years in the strategy. There is a major omission leaving out people with dementia other than offenders and people with learning difficulties.

Digital - get experts involved - and children and young people! There is research showing that the skills to exploit and develop the benefits of digital etc do not lie in public sector. This must be done collaboratively and co-designed with 'service users' for max impact. Please don't waste the opportunities here.

Building etc. - the strategy does not address issues for our

<p>oldest older people and people with dementia. This is a major omission. Please think beyond wheelchairs and physical access - cognitive, sensory. The physical and social environment is critical to people with dementia and care-partners. It can enable or disable and a bad environment can lead to service demand and care home admission and can be preventable or delayed.. There are lots of tools and it can be embedded in ways that doesn't look like its a care home as that will put people off. Please talk to me about out Design for Life project. Homelessness - is someone living in a house that doesn't meet their cognitive or sensory needs homeless? They are still disabled. Dementia is a disability and people have the double whammy of ageism.</p> <p>Stop talking about specialist provision and start developing innovative solutions. Look at what's happening elsewhere and start thinking how to make it work here. Use the large evidence and practice bases.</p> <p>Definitely need to look at sheltered housing but as one of the range of housing options. Yes to housing advice, thinking ahead, culture change - though many people want to do it, the evidence suggest that lack of advice and desirable options holds them back. Usual point about wheelchairs and accessibility.</p> <p>Yes to adaptations but see above about doing them with style not adding stigma. Doesn't need to cost more and many people choose to pay to get nicer stuff leaving people with less nice stuff. Think NHS glasses before they got trendy! Yes to earlier housing advice but same stuff applies.</p> <p>Supporting people to live in communities is not just about services it is about accessible communities - libraries, shops,</p>		
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transport, pavements etc etc., This is the really sustainable and prevention-packed area. If you help people stay connected to their communities and promote good quality communities, they are less reliant on services that we can't afford to run or maintain and which are often resisted until people have to use them. This is part of new thinking required to address demographic, we can't afford communities where people have to be befriended, we need communities where people are connected. This is why AiP is so important and Place-making and community empowerment.

Stock - see above about fit for life, digital, cognitive, agile, Intergenerational etc. What does quality mean for someone who's 95?

Age not fully developed - Doesn't seem to have drawn on considerable body of work on housing and ageing and dementia, yet ageing is identified as a major issue for the strategy.

Dementia a major disability with a significant impact on housing policy is more or less ignored.

Couples - Sweden they have a right to live together in all settings.

People should be consulted as citizens not as service users.

LGBT? Need a fuller assessment especially given comment about couples.

I am very disappointed that dementia is largely ignored. This excludes people with significant housing needs that are not

being addressed in East Lothian. There are some really innovative approaches to housing and support for dementia that can benefit many other groups and stimulate the culture change and mindset we need. People are inspired and excited for example by intergenerational housing approaches. You have to think differently about dementia, it can't be addressed by the usual approaches. The strategy should at very least start to make steps in these directions, there is scope in the plan but given the invisibility of dementia it is not clear if this will happen.

The vision needs to be forward looking, inspiring and place housing more clearly in the wider context of place making, ageing in place, transport, economic development and social care. It needs to show how the right decisions about housing deliver QOL and better use of resources now and in future. And an action to get us started.

It is not good enough to relegate all discussion of older people's housing to 'specialist' option and it is critical to look beyond physical impairment as an issue for older people, especially our oldest old. This approach will make problems worse and create new ones.

The strategy needs to show more clearly how actions will deliver outcomes, or at least take us in the right direction. Many of the really good things in the vision need more than just building more houses. The way we're building houses just now without the wider picture is creating problems, including social isolation. This exacerbates and enhances the negative impact and symptoms of dementia creating demand for services and carer -burn out.

<p>Consultation - could have been much better, I did make some points of contact and it looked promising then staff changed and it all disappeared.</p> <p>I could have done lots to support the participation of people with dementia. I offered an event, could have circulated material to the many people with dementia and care-partners I work with directly, especially people at the point of diagnosis which is a critical time to plan ahead. Could have done focus groups or case studies.</p> <p>Have a look at Post diagnostic support in dementia strategy. Support for planning at this stage is recognised through Dementia Strategy and PDS. We could do more round housing options especially adaptations. Life Changes Trust has funded great projects.</p> <p>If you have consulted with people with dementia and care-partners their views and opinions remain invisible.</p>		
<p>62. Too many houses being built</p>	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p> <p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a</p>	<p>No</p>

	<p>sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p>	
<p>63. Stop the building, you are spoiling a stunning area of Scotland.</p>	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p> <p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p>	<p>No</p>
<p>64. STOP RUINING OUT COUNTY!</p>	<p>A comprehensive housing need and demand assessment approved by the Scottish Government as 'robust and credible' has informed the draft LHS. The assessment estimates that 183 households will require market housing and 370 households will require affordable housing in East Lothian each year until 2032. This is a total of 553 households per annum.</p> <p>At the time of writing the draft LHS, there were 3,700 households on the housing list, with only 403 allocations made during 2016.</p>	<p>No</p>

	<p>It is clear that need and demand for housing far exceeds available supply. However while the scale of need is evident across the county, the LHS recognises it is critical that investment responds to local need and circumstances at town and village level. The challenge is to ensure there is a sufficient number of homes of the right types in appropriate locations, to accommodate anticipated growth in the number of households living across the county. A key action for the LHS is to prepare a local investment framework, to identify need at a local level, within the context of local circumstances and ensure investment in the right places.</p> <p>The Strategic Development Plan for Edinburgh and South East Scotland (SDP) sets the requirement for each Local Authority in this region to prepare a Local Development Plan (LDP) to deliver new homes. Each LDP is required by legislation to comply with the requirements of the SDP. The housing requirement for East Lothian in the period 2012-2024 is for 10,050 new homes. As well as planning for growth the plan mitigates the impact of new development by introducing new landscape designations to protect the character and identity of East Lothian including Special Landscape Areas and Countryside around Towns areas as well as developing a Green Network throughout East Lothian. Planning Policies are also in place within the LDP to protect areas of open space within towns.</p>	
<p>65.</p> <ul style="list-style-type: none"> • The 2020 target to have all ELC properties surveyed is very optimistic based on what the surveyors have achieved so far. These surveys are vital as they will be identify future programmes and the measures that will be required to meet EESSH. • The 2011 private sector stock survey is coming up for 7 years old and some of this information may now be out of date and incorrect. 	<p>It is acknowledged that some aspects of the private sector stock condition survey are out of date, however the broad themes emerging are considered to still remain relevant. The results from this survey are also triangulated with other data sources where appropriate i.e. Home Analytics data; Scottish House Condition Survey data and HEED data.</p>	<p>No</p>
<p>66.</p>	<p>The LHS document contains an action to ‘develop a Council Housing Asset Strategy’, which will address the key points noted.</p>	<p>No</p>

<ul style="list-style-type: none"> • We are continuing to invest in our stock but the ELC standards for these (kitchens, rewires, bathrooms & heating) have not been looked at for some years and with the population demographic changing with more elderly tenants this needs to be addressed so that properties can be made easier to adapt. • These standards could also feed into our new builds • We could look at the use of solar power rather than just installing it to tick a box for planning & building control. • For communal properties where we may struggle to meet EESSH, solar and low energy lighting could help • Pilot projects could be initiated for both retro-fitting and new build to look at the benefits of all energy efficiency measures both for the tenant and for ELC. 		
<p>67.</p> <ul style="list-style-type: none"> • Meeting EESSH by 2020 will be an achievement but we may end up carrying out energy efficiency measures to meet this target but then have to revisit the property to then meet EESSH 2032 which is now being discussed. • The SEEP transition programme guidance 2018/19 states that the Local Heat & Energy Efficiency Strategy (LHEES) may replace the LHS for prioritisation of funding. 	<p>The point re EESSH is acknowledged, however no action is required.</p> <p>At present the LHS covers the strategic approach to fuel poverty, energy efficiency and some aspects of climate change. The Scottish Government is considering proposals in accordance with two recent consultations to remove the existing statutory duty to tackle fuel poverty within the LHS and for this to be covered within the new Local Heat and Energy Efficiency Strategy (LHEES). The LHEES is likely to become a statutory duty for local authorities to develop from 2018.</p> <p>The LHS does not currently form a basis for the provision of funding.</p>	No
<p>68. Sadly, the majority of individuals who require specialist provision and support to achieve independent living will be recipients of welfare benefits and not in employment. It is suggested that the LHS recognises that housing to meet the needs of these individuals is within towns, villages and the more urban areas within the count. This would also assist in</p>	<p>A comprehensive housing need and demand assessment of particular needs groups has been carried out to inform the LHS. This recognises that further work requires to be carried out in relation to future proofing the workforce and ensuring the rural nature of East Lothian is considered in relation to ensuring efficient and effective care delivery. However this action sits within the Health and Social Care Strategic Plan as opposed to the LHS. Joint working</p>	No

<p>addressing the difficulty of recruitment and retention of the social care workforce. Developing specialist provision in areas ill supported by public transport networks makes recruitment and retention inordinately more difficult, expensive and therefore undermines the opportunity for the successful support of the individuals these developments are aimed at.</p>	<p>between the Housing Strategy Team and the Health and Social Care Partnership will enable communication around this area.</p>	
<p>69. As the document is currently written, it suggests that those with MH, Autism or Learning Disability, who require core and cluster specialist provision, could be accommodated within the same development. This makes an assumption that the support needed to live successfully within a community is interchangeable. It also presents a level of risk, not least to the health and wellbeing of the individuals receiving support, but also in terms of ghetto-isation of the development and the lack of personalisation of support within such developments.</p>	<p>A comprehensive needs assessment has been completed, taking account of the levels and nature of the needs of vulnerable groups. On this basis, it has been decided that core and cluster housing is the preferred model for this group, with some flexibility built in to allow for a range of needs.</p> <p>Core and cluster housing, comprising a staff presence and additional units of housing in close proximity, is considered to provide residents with the confidence and security of knowing staff are on hand if required, while fostering independent living where appropriate. It is anticipated this will promote health and wellbeing and reduce risk.</p>	<p>No</p>
<p>70. We would suggest that the LHS, within this section, recognises the need for specially designed environments, in small numbers for people with complex needs, e.g. people referred to within the document as “complex hospital discharges”. Married together with the number of out of area placements that have had to be secured due to lack of local options, we would recommend that this is captured as an additional need, above the identified requirement for care and cluster housing development.</p>	<p>Complex hospital discharges and out of area placements have been captured within the comprehensive needs assessment and inform the outputs of the study i.e. the requirement for 8 units of core and cluster housing per annum.</p>	<p>No</p>
<p>71. It should also be noted that the core and cluster requirements require to be barrier free as many people with mental health needs and/or learning disability also have an associated physical disability/ limited mobility.</p>	<p>It is considered appropriate for core and cluster housing to be barrier free.</p>	<p>No</p>
<p>72. People with a conviction: Use of B&B: person must leave their room in the morning, and with little routine, meaningful</p>	<p>The draft LHS acknowledges that it is not beneficial for individuals to be accommodated in B&B accommodation. Further in depth work will be carried</p>	<p>No</p>

<p>day activity or support, has much reduced changes of successful engagement in the community or rehabilitation. There are currently no arrangements to house people on release from prison.</p>	<p>out as part of the Temporary Accommodation Strategy to address this and reduce the use of B&B accommodation, which is a key action of the LHS.</p> <p>Scottish Quality Standards, Housing Advice, Information and Support for People in and Leaving Prison (SHORE standards - Sustainable Housing on Release for Everyone) was published in 2016. The SHORE standards are key to preparing people in and leaving prison for successful reintegration into the community, ensuring their housing needs are identified at the earliest opportunity throughout their sentence and as part of the preparation for their release and that their need are then met in a timely fashion. A training toolkit currently being produced by Housing Options HUBS will be an invaluable resource nationally in terms of supporting SHORE standards in practice. This will be used to train staff across East Lothian as appropriate. The LHS includes an action to 'Work with Reducing Re-offending Group and the SPS to implement the Sustainable Housing on Release for Everyone (SHORE) standards'.</p>	
<p>73. The issues and impacts of Welfare Reform, poverty and fuel poverty are recognised as having a cumulative effect on all of the population groups considered in Chapter 8. We would advocate that consideration of housing tenure and support for these groups takes full consideration and attempts to mitigate the impact of these life stressors.</p>	<p>Full consideration will be given to reducing fuel poverty and mitigating welfare reform impacts for all of the population groups set out in Chapter 8 where possible. The definition of fuel poverty will change during 2018 in accordance with the revised Scottish Government Strategy and targets, with vulnerable groups likely to be identified as experiencing high levels of fuel poverty. Reducing fuel poverty for the most vulnerable groups is a key priority for the LHS.</p>	
<p>74. Some of the statistics quoted within the document are perhaps not wholly accurate. For example, the statement that the number of people with learning disability is growing faster than the population overall is incorrect. The issue is one of increased life expectancy for people with LD, therefore for the first time we have a developing population of older people with LD, alongside the general 2% incidence within overall society.</p>	<p>Statement removed</p>	<p>Yes</p>
<p>75. At page 72, the LHS makes reference to the difficulty in engaging people with mental health support needs, and thus the low level of care packages. This presents a skewed picture.</p>	<p>The draft LHS has been updated to include the provision of support via other means for individuals with mental health support needs.</p>	<p>Yes</p>

<p>High numbers of people with MH support needs receive their support through other services, e.g. Community Nursing, not necessarily care packages. It would be inaccurate to use the provision of care packages as an indicator of the numbers of people in receipt of support.</p>		
<p>76. Section 8.5; the incidence of autism has for some time been recognised as 1:90 across the general population. It is reported that 4 in 10 people with autism will also have learning disability. The high rate of epilepsy is recognised within the Learning Disability population, not people with autism.</p>	<p>The statistics in the LHS have used the East Lothian Autism Strategy as a starting point, which states 'In East Lothian it is estimated (based on the prevalence rate of 90 in 10,000) that there are 835 people with autism across the lifespan). This has been updated to take account of changing demographics, resulting in a figure in the LHS of 850. The reference to epilepsy has been removed.</p>	<p>Yes</p>
<p>77. Page 75: We would suggest that the statement indicating that complex hospital discharges are mainly as a result of hospital remodelling, is reworded to acknowledge that the hospital remodelling is Scottish Government policy.</p>	<p>The draft LHS states 'The integration of health and social care agenda puts more emphasis on enabling people to stay in their own homes or a more 'homely' setting. This builds on more than a decade of Scottish Government policy aiming to 'shift the balance of care' from hospital and institutional settings, to care in the home and community'. This wording remains in the final LHS document and has been emphasised as appropriate.</p>	<p>Yes</p>
<p>78. We would welcome the opportunity to work more collaboratively, for example develop more robust links between the ELC SLAB project and Mental Health/ Disability services.</p>	<p>East Lothian Council would welcome the opportunity to work more collaboratively i.e. develop more robust links between ELC SLAB project and mental health / disability services.</p>	<p>No</p>
<p>79. Whilst the issue of transport is recognised throughout the document, it is suggested that more emphasis is given to the development of public transport routes to support in particular, development within the social rented market. It would be helpful to acknowledge that many people affected by poverty or other additional needs may have limited access to private transportation. Lack of action to address this issue will exacerbate social isolation and drive up living expenses.</p>	<p>While the issue of transport is recognised throughout the document where appropriate, this is not a requirement of the statutory LHS in accordance with Guidance. East Lothian Council is consulting on a new revised Local Transport Strategy which will be published in 2018/19 and this will link to the final LHS.</p>	<p>No</p>
<p>80. There is a concern that the standard of temporary accommodation on offer remains very poor and contributes to</p>	<p>Additional text has been included in the LHS to reflect concerns in relation to the standard of temporary accommodation.</p>	<p>Yes</p>

<p>further social isolation. If the accommodation is separate to the individual's key support networks, it can also increase poverty and loneliness through inability to access ones family / usual supports.</p> <p>There is much research that indicates the housing first approach is far more effective in addressing issues of mental health, substance misuse etc. as, with secure tenancies, the individual is approaching support from a position of increased security. We would recommend that the housing first approach is given increased visibility within the LHS and expanded beyond actions to address homelessness.</p> <p>We would also like to reinforce the detrimental impact of the increasing length of time spent in temporary accommodation, stated within the LHS as being 374 days in 2016/17, on the mental wellbeing of individuals within this situation.</p>	<p>The LHS includes an action to 'explore the 'Housing First' model to ensure appropriate specialist support is available for homeless people with complex needs'. Additional text has been included in the LHS document to give the Housing First approach more visibility.</p> <p>The detrimental impact of lengthy periods in temporary accommodation and increasing length of time in temporary accommodation is recognised within the LHS. Reducing time spent in temporary accommodation will be a key priority of the action to prepare a temporary accommodation strategy.</p> <p>Additional text has been included within the LHS document to reinforce that the length of time some households spend in temporary accommodation is unacceptable and addressing this is a key priority.</p>	
<p>81. We wonder if there might be an opportunity to mention the housing first approach more strongly in the homelessness section. There is growing evidence that is the most effective preventative measure to address chronic homelessness. Obviously this has some resource implications but we can think that through.</p> <p>We might also think about how housing and health and social care colleagues could work together better to address homelessness as part of a combined approach for the most excluded groups.</p> <p>We also wondered about adding some text in the older people section that highlights issues relating to the working age population, multi-morbidity, and population ageing. This would re-iterate the importance of prevention and healthy ageing.</p>	<p>The LHS includes an action to 'explore the 'Housing First' model to ensure appropriate specialist support is available for homeless people with complex needs'. Additional text has been included in the LHS document to give the Housing First approach more emphasis.</p> <p>The Housing Contribution Statement acts as a bridge between the Local Housing Strategy and the Health and Social Care Strategic Plan. A revised Housing Contribution Statement requires to be published in 2019 and this will have a focus on addressing the most excluded homelessness groups.</p>	Yes

<p>82. I am writing to commend the draft strategy and in particular the emphasis on affordability as a function not of 'price' but of income. Affordability needs to be evaluated in relation to what the purchaser might reasonably afford - not what the developer thinks is simply 'cheaper than... very expensive'.</p> <p>I wish to further commend the way in which the strategy understands and expresses 'equalities'. This is a strength of the consultation but it needs to be fully supported by public sector housing. I would encourage all the creative opportunities ELC envisages for providing safe, warm, amenable homes for those on lower incomes.</p> <p>I have only one comment to make that might offer something new.</p> <p>Increasing human longevity is a feature of the projections and raises an issue not addressed - as far as I can see - in the planning.</p> <p>As people live longer those to whom they might wish to leave an inheritance also grow older. Childless couples or individuals or those whose children are already well provided for have to decide how their assets should be dispersed after death. Single people, in particular, face hefty inheritance tax charges. Given the value of property in parts of East Lothian many people will face 'losing' 40 percent of the value of their estate in IHT.</p> <p>Have Councils considered the possibility of 'pre-death agreements' whereby inheritance tax could be avoided? Property owners may choose to agree that, on their death, their property would be sold to the Council at below market</p>	<p>It is unclear how this proposal would be perceived by the tax authorities, given the fine line between legitimate tax avoidance and illegal tax evasion. It is considered that anyone considering such an arrangement should obtain specialist independent tax advice, which is not something the Council can become involved in.</p> <p>In many cases a person's estate, even including the house, will still fall below the IHT threshold, especially if the household comprises a couple and the new reliefs are aimed at making it more workable to leave the family home to the children without attracting excessive tax liabilities. It is considered there are unlikely to be a large number of estates that would potentially be in a position to benefit from such an arrangement in any event.</p> <p>For those that might be in a position to benefit from such an arrangement, it would be for the owner to carefully consider the situation with the benefit of specialist tax advice and for any such arrangement to be entered into on a case by case basis rather than as a set scheme / policy.</p> <p>In relation to the question 'is there a way to rethink IHT as bricks and mortar?', this is not a question that East Lothian Council can answer, this is more for the tax authorities / Scottish Government to consider.</p>	
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<p>value on condition that it was then used to enhance the social housing stock.</p> <p>Effectively the vendor's estate would be paying IHT but in the form of a 'bricks and mortar' contribution for the benefit of the community. Beneficiaries of the deceased's Will would get the (reduced) inheritance free of IHT; Councils would enhance the housing stock; the Scottish Government or HMRC would receive less IHT but the housing stock would be improved.</p> <p>My comment is prompted by having observed numerous instances where inheritances - though welcome and appreciated - are not in fact 'needed' by the recipients. Is there a way to re-think IHT as 'bricks and mortar' to make affordable housing more available for rent?</p>		
<p>83. It is pleasing to see that Health and Wellbeing has been made an underpinning principle of the draft strategy and we would particularly support this approach. We also support the emphasis in the document on the importance of place-making.</p> <p>Demographic changes in relation to East Lothian's population is clear and there is clear analysis and understanding of the differences within East Lothian's communities. The balance of numbers and projected rate of change amongst the older population is well understood and should help prioritise interventions required to deliver maximum impact.</p> <p>There is good understanding of the priorities for action to support an ageing population in both urban and rural places</p> <p>It is pleasing to see the emphasis on the importance of digital infrastructure to support future service delivery, in particular,</p>	<p>Work has been undertaken at the time of LHS publication (June 2018) to assess the requirements for hospital / care home re-provision in East Lothian (the IJB paper referred to here) and public consultation is ongoing in relation to this. Separate to this, the 300 units specified as being required in the LHS have been identified on the basis of detailed analysis of demographic change / projections. While there are recognised links between three workstreams, namely housing needs assessment of older people; work around hospital re-provision and review of sheltered housing, any requirement for accommodation arising as a result of hospital re-provision is considered to be over and above the requirements set out in the LHS 2018-23. This has been emphasised for clarity in the final LHS 2018-23 document.</p> <p>The 300 units of accommodation proposed for older people is in response to research into projected demographic change and growth. While there are recognised links between these work-streams, any need for housing / specialist provision identified as a result of anticipated hospital / care home re-provision, is considered to be over and above the 300 units. This has been emphasised in the final LHS.</p>	<p>Yes</p>

<p>to vulnerable groups in rural areas. We believe this should be an area of particular priority.</p> <p>We are supportive of the emphasis on future proofing mainstream property and building in maximum flexibility to adapt to ensure that future needs are met. We are of the view that this also requires particular focus to translate to delivery 'on the ground'.</p> <p>300 units of specialist accommodation are proposed for older people to meet demographic changes. How does this relate to the paper taken to the IJB recently regarding the draft proposals for the re-provision of hospitals and care homes – does the figure of 300 include this, or is it in addition to?</p> <p>We can't see specific reference to dementia in relation to the section of older people – we understand this will be in the underpinning analysis which has been carried out but it would be useful to reference in the LHS although it is implicit in some of the language used.</p> <p>There doesn't appear to be a resourcing element attached to the action plan and it is assumed that not all actions identified will, in reality, be able to be taken forward. It would be useful at this stage to undertake this resource requirement analysis and ensure that the finalised action plan can be delivered and actions identified have the maximum impact.</p> <p>There is reference in the document to East Lothian Health and Social Care and LHS Planning Structures and going forward, we would like to engage in these processes. We believe that Viewpoint could positively contribute to the delivery of the East</p>	<p>A specific section on dementia has been added to the final LHS.</p> <p>A resourcing element has not been attached to the action plan in relation to finances, which is considered likely to change throughout the lifetime of the LHS. Resources have been set out in relation to teams / organisations identified to take forward specific actions. It is anticipated that although ambitious, the actions are all identified as being required at time of LHS publication (June 2018) in order to achieve priority outcomes and the overall vision. An LHS review will be completed annually to assess progress against actions, with a detailed monitoring framework setting out key indicators and milestones. This will enable early identification of actions in danger of not completing and allow mitigating / remedial action to be put in place to address this.</p> <p>East Lothian Council would welcome further discussion with Viewpoint. A Housing Thematic Group will be set up during 2018/19 to enable delivery of the East Lothian LHS 2018-23 in relation to specialist provision and key staff from Viewpoint will be invited to attend this group.</p>	
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<p>Lothian LHS and we would be keen to have a further discussion in this regard.</p>		
<p>84. In terms of specialist provision and independent living, the draft does not mention the oversight group which involves senior managers from the Health and Social Care Partnership and housing and the operational group which has been established to gather local intelligence about need and demand and respond with provision.</p> <p>There is no mention of housing for people with drug and alcohol issues or veterans in the particular needs section. Is it assumed that they are covered in some of the other groups? We would suggest that they should be identified separately.</p> <p>Specialist housing should incorporate respite / short breaks options as we know that this is a particular pressure area for most client groups specifically older people and people with mental health issues. If these services were attached to developments this would also support clustering of care and support. Transitional care should also be considered as part of the overall housing need given the IJB direction to provide care closer to home and within a homely setting.</p>	<p>The LHS is wide ranging and it is not considered appropriate to mention all of the groups involved in contributing to specific areas of work as this is estimated to equate in excess of 200 groups.</p> <p>A section on veterans will be added to the LHS.</p> <p>Consideration of housing for people with drug and alcohol issues as a separate group has been considered, however a decision has been made not to include this as a specific separate group, given that cover is provided within the other groups. The draft LHS is currently heavily weighted towards vulnerable groups / specialist provision and while the LHS would like to cover all groups, this is not always possible, given other areas which require to be covered.</p> <p>The Housing Strategy Team is not averse to considering respite units / short breaks options, with specific mention made of the need for short-term accommodation for people with a learning disability in the LHS. A corresponding action is to 'investigate the feasibility of developing short stay accommodation to enable people with a learning disability to gain independent living skills'. However the LHS is primarily about homes as opposed to short breaks and respite, therefore no targets are included in the LHS for this type of accommodation.</p>	<p>Yes</p>
<p>85. The draft actions appear to cover the identified issues. In relation to the proposed 8 units per annum for people with mental health, learning disability and physical disability, we feel that there needs to be further work in relation to whether this will provide enough housing for this group.</p> <p>We welcome the broad use of the term 'units' and trust this will include various models including residential care.</p>	<p>A significant amount of work has been involved in the joint production of a housing needs assessment for particular needs groups across East Lothian. This work was led by the Council's Housing Strategy Team, with significant input from the East Lothian Health and Social Care Partnership. The needs assessment covers a wide range of vulnerable groups including those specified here, with joint agreement that 8 units per annum would be more than sufficient. Given this, no further work is planned at present.</p>	<p>No</p>

<p>In terms of the proposed 300 units over the five years for older people can you please confirm that this is in addition to ongoing plans to redevelop Belhaven, Edington, Abbey and Eskgreen. It is our understanding that the 300 units would be in addition to this piece of work, recognising that there will be some overlap.</p> <p>There is reference to workforce required to support the specialist housing. There are some strategic plans in place, however more in depth work needs to be done in relation to the growing pressure and potential lack of work force.</p> <p>We are aware of ongoing work in relation to young people with mental health issues and feel this is a specific area of work that needs to be considered within the strategy as the housing needs / model for this group may look different over the next five years.</p> <p>We are aware through use of the way finder model that we locally lack a transitional housing response for people who are ready to leave hospital but need something more than housing with care and support. Within the strategy there is no mention of working in partnership with a neighbouring authority and wondered if this could be considered.</p> <p>While we appreciate that the LHS needs to cover a number of key areas, the length of the document may make it difficult for the public to fully engage in the consultation process. An accessible or summary version would have been helpful to compliment the feedback already gathered through the various focus groups.</p>	<p>The term 'units' is used in the LHS to mean units of housing i.e. one unit equals one individual property or spaces within a larger property i.e. bed spaces within a larger residential unit or care home. For clarity, one unit would not be taken to equate to a sixty bed care home, rather this would be viewed as sixty units.</p> <p>The proposed 300 units of housing over five years for older people is in addition to any provision deemed to be required to address the re-provision of existing hospital sites. The 300 units are identified as being required simply to address projected demographic change / growth. It is recognised that there will be some overlap / links between the requirement to develop additional housing for older people and hospital re-provision.</p> <p>It is recognised that more work requires to be done in relation to the potential lack of workforce. This was recognised in the housing needs assessment of particular needs groups. However it is considered that further work in this area relates to Health and Social Care and the corresponding Strategic Plan and does not fall within the scope of the LHS.</p> <p>People with mental health issues, including young people are given due consideration within the LHS. A housing needs assessment of particular needs groups has been completed, covering people with a mental health condition, with planning carried out over the next five years to 2023, the lifetime of the LHS. Further modelling of need is likely to be carried out for the next LHS 2024-29.</p> <p>The LHS covers housing with care and support. Consideration of accommodation requiring more than this would fall under the remit of the East Lothian Health and Social Care Partnership and corresponding Strategic Plan.</p> <p>It is acknowledged that the length of the document may make it difficult for the public to fully engage in the consultation process. To compliment the 20</p>	
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	supported focus groups held across the county, 3 sessions were organised for the general public to engage with the LHS in an informal, unthreatening and supported environment, which were widely publicised, although there was no attendance at any of the three events. An easy read guide and executive summary of the final LHS will be produced.	
<p>86. Provide a reference to the SESplan area, specifying what this is and the council areas covered.</p> <p>The reference to GVA should be included in the glossary or explained in the text.</p> <p>Social rent is not defined under the different tenures listed.</p> <p>The section headed mid-market housing should perhaps be amended to mid-market rent.</p> <p>The SHIP bid should be cross-referenced to housing supply targets.</p> <p>Some errors have been noted with regard to completion figures for East Lothian Council.</p> <p>Should there be a reference for the comprehensive needs assessment?</p> <p>Mechanical cooling systems may not be needed if the possibility of overheating is considered at design stage.</p> <p>Housing in Civic Square is considered to be ambitious in relation to timing.</p>	<p>All references have been included in glossary and / or in text as appropriate and references added / changed with regard to social rent and mid-market rent.</p> <p>Errors with regard to completion figures have been noted and changed.</p> <p>A reference has not been included for the comprehensive needs assessment as all appropriate information has been set out in some detail in the LHS document.</p> <p>It is acknowledged that mechanical cooling systems may not be required although this is considered to be a matter for delivery rather than the LHS.</p> <p>Dates for Civic Square have been changed from 2020/21 to 2023.</p> <p>It is noted in the final LHS that new build housing is generally much more efficient than older housing.</p> <p>Reference to construction framework removed.</p>	Yes

<p>New build housing is generally much more energy efficient than older housing as the current regulations are quite demanding in this respect.</p> <p>East Lothian Council has a construction framework for new build housing in place and this has been in operation since January 2018</p>		
<p>87. Thank you for the opportunity to comment on the recently published Local Housing Strategy (LHS).</p> <p>We are puzzled regarding the timing of this consultation. Reporters are currently preparing to make known their recommendations on the draft East Lothian Local Development Plan and it seems a curious moment to go public on a closely related document and difficult to understand how a consultation on the draft LHS can be meaningful in the absence of the Reporters' recommendations on the LDP.</p> <p>It is surely <u>not</u> the case that "the LHS is the sole strategic document for housing" as you state in your Foreword to the LHS. The role of the LDP is, or should be, fundamental in identifying and allocating suitable land for meeting locally generated and other housing requirements.</p> <p>In your Foreword you state, quite correctly in our view, that "getting housing right is about supporting place-making to ensure new housebuilding fosters good community relations and promotes health impacts". This objective however is also vested in the LDP and this again illustrates our concern regarding the timing of your consultation.</p> <p>We find sections 5.4 and 8.3, Sustainable Places and Older People respectively, unconvincing and we feel that this is likely</p>	<p>The LHS is the sole strategic document for housing. Scottish Government Local Housing Strategy Guidance (2014) states '<i>The LHS is a local authority's sole strategic document for housing. The Housing (Scotland) Act 2001 places a statutory requirement on local authorities to prepare an LHS which sets out its strategy, priorities and plans for the delivery of housing and related services</i>'. The LHS and LDP are complimentary, with the LDP identifying and allocating land to meet identified housing requirements.</p> <p>Local authorities, as both the statutory housing and planning authority, are responsible for assessing housing requirements, ensuring a generous supply of housing land and enabling the delivery of both market and affordable housing. The LHS is closely aligned to the Strategic Development Plan (SDP) and LDP through the housing development planning framework. The Housing Need and Demand Assessment (HNDA) is a key part of the evidence base for both the LHS and Strategic and Local Development Plans and forms a starting point for setting Housing Supply Targets in both the LHS and development plans. The HNDA provides a robust, shared and agreed evidence base for housing policy and land use planning and ensures that the LHS and development plans are based upon a common understanding of existing and future housing requirements. In accordance with this, Housing and Planning functions within the Council have worked closely together to take forward the processes that underpin effective housing planning and the delivery of positive housing outcomes. Joint working in line with Local Housing Strategy Guidance (2014); Housing Need and Demand Assessment Guidance (2014) and Scottish Planning Policy (2014) has ensured appropriate integration and synchronisation, in relation to the preparation of a HNDA, setting housing</p>	<p>No</p>

<p>to be because of the apparent lack of integration and synchronization between the forward planning and housing functions within the Council.</p>	<p>supply targets and preparation of the LHS and Development Plans. Development Plans support the strategic direction of the LHS and vice-versa.</p> <p>Given that the HNDA is used to inform the Development Plan Main Issues Report and LHS, it is important that these documents are timetabled to take account of HNDA findings. Housing and Planning functions of the Council have worked together to ensure the findings from HNDA2 inform the LHS and the main issues report of SDP2.</p> <p>Place-making and sustainable places are critical underlying principles of the LHS, reflected in LHS Guidance. Well-designed, sustainable places increase both physical and mental well-being and housing has a key role to play. Housing helps to shape, maintain and support sustainable places, through both the provision of high quality development and the provision of effective services that assist in maintaining and supporting communities. In accordance with LHS Guidance (2014), the LHS must 'Explain the local authority's overall approach to supporting the development and maintenance of sustainable communities, including through the delivery of good quality, sustainable housing'. In relation to the policy agenda around place-making and sustainable places, the LHS and LDP can be seen as complimentary.</p> <p>In relation to the section on older people, the LDP supports the principle of making provision for specialist housing to address need, with identified requirements set out in detail in the LHS. Again, the LHS and LDP are complimentary in this respect.</p> <p>LHS Guidance sets out the relationship between the LHS and LDP. http://www.gov.scot/Publications/2014/08/3070</p> <p>The Housing Planning Framework Diagram illustrates each stage and sequence of the Scottish Government Housing Planning Framework from HNDAs to LHSs to development plans.</p>	
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	<p>http://www.gov.scot/Topics/Built-Environment/Housing/supply-demand/chma/hnda/DraftingArea/housingplanningframework</p> <p>The SPP diagram shows the requirements for LHSs and LDPs, showing key areas of alignment.</p> <p>http://www.gov.scot/Topics/Built-Environment/Housing/supply-demand/chma/hnda/DraftingArea/SPPDiagram</p>	
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