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20 December 2018

**RE: East Lothian Design Standards for New Housing Areas**

Dear Sir / Madam,

Homes for Scotland is the voice of the home building industry in Scotland, representing some 200 organisations who together support the delivery of around 95% of all new homes for sale each year as well as a significant proportion of affordable housing.

While HFS recognises that the proposed East Lothian Design Standards for New Housing Areas (design standards) is fairly consistent with previous versions, our members have highlighted some concerns surrounding the interpretation and implementation of some aspects of this guidance. In that context, rather than provide a response to the set consultation questions we wish to provide more constructive feedback on the specific issues raised by our members.

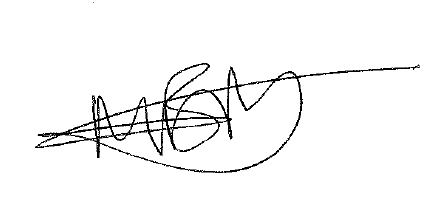
A core concern centres around the principle that “parking must…be provided to the rear of buildings where it is out of sight”. Whilst we acknowledge the fundamental principle of reducing the visual and physical impact of motor vehicles from the residential streetscape, we question whether this aligns with the expectations of current and future home buyers, and ultimately the aim of meeting the needs of the customer and creating high-quality places where people want to live. However, this standard is prohibitive of the incorporation of integral garages, which we understand to be a key feature of many new house types and a growing trend amongst customer expectations. Furthermore, when considered alongside wider associated guidance we see the following possible conflicts:

1. The 3.5m depth limitation on front gardens also implies that driveways will not be acceptable and is prohibitive of front of building parking. When considered within the context of the required 18m distance between adjacent windows, a considerable amount of hard landscaping would be required to fill any void between building facades.
2. The provision of visitor bays will, more often than not, be utilised by occupiers where possible, defeating the purpose of the proposed design intention and aims of the guidance.
3. Such prescriptive standards fail to accommodate the need for alternative parking solutions which seek to meet the varying needs of occupants across a range of housing tenures. This may simply not be appropriate for particular developments.
4. There is the potential that such a standard would have an impact on user accessibility, security and surveillance.
5. With policy initiatives seeking to mainstream electric vehicles by 2032, the standard limits the potential for occupiers to accommodate affordable charging infrastructure within their properties/garages.

More generally, members are keen to ensure that the design standards align with the wider principles contained within associated national guidance such as Designing Streets and the SCOTS National Roads Design Guide to ensure there is a level of consistency in implementation across Scotland. For example, the requirement of ‘primary streets’ or the co-location of footpaths in addition to ‘shared surfaces’ is seen as being unnecessary and one that hinders the intent behind Designing Streets. Subsequently, these standards should be fully adopted by all stakeholders within the process, helping ensure there is no conflict between the design principles and what can be approved by highways departments/roads engineers. However, standards and guidance must also provide flexibility to be able to draw out the unique qualities of individual sites. Whilst prescriptive guidance offers consistency in interpretation and application, scope to deviate beyond the scope of the guidance can also provide opportunity to draw out particular features of a site. In that context, embedded flexibility can enable high-quality design and place-making.

Whilst the above concerns have been raised by our members, there is general sentiment that development in East Lothian has been of a good standard, improving in terms of design and quality quite significantly over the last few decades, and have aligned with what we understand to be market needs and expectations. Should this be debated, it would be helpful if wider market research was undertaken to better inform the design standards which will guide both industry and local authorities in enabling the creation of high-quality places.

Yours faithfully,



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