

Short-term Let Control Area for Edinburgh - Proposed Designation

Integrated Impact Assessment

Summary Report

Interim report		Final report	x
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1. Title of proposal

Short-term Let Control Area - Proposed Designation

2. What will change as a result of this proposal?

Planning permission will be required for the change of use of a residential property to secondary letting within a designated short-term let control area.

3. Briefly describe public involvement in this proposal to date and planned

Choices for City Plan 2030 consultation in 2020 set out the preferred option to consult on an area of control. A draft proposal was published in August 2021. The consultation ran for a period of 9 weeks. A notice was published in the Evening News and Community Councils notified of the proposal. The statement of reasons, map of the proposed area of designation and background report were made available on the Council website, along with FAQs. Consultation materials were written in plain English and designed to be understood by a range of population groups.

The consultation was available on the Council consultation hub. It sought views on the principle of a control area for Edinburgh and the designation of the entire Council area.

The following activities were used to raise awareness and encourage people to have their say during the consultation:

- Press release on start date.
- Facebook, Twitter and LinkedIn
- Articles on the Planning Blog at start of consultation and towards end.
- E-mail to Planning Blog mailing list
- Notification to key stakeholders by e-mail

The proposal received national media attention with articles in many newspapers and radio coverage.

4. **Is the proposal considered strategic under the [Fairer Scotland Duty](#)?**

The relevance of the proposal has been assessed as high.

5. **Date of IIA**

12 July 2021 and 7 January 2022

6. **Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)**

Name	Job Title	Date of IIA training
Lindsay Robertson	Senior Planning Officer (Lead Officer & Facilitator)	25 April 2018
Jackie McInnes	Senior Planning Officer	25 April 2018 3 May 2018 20 June 2018 5 September 2018 8 November 2018
Keith Miller	Senior Planning Officer	25 April 2018
Kevin Ryan	Team Manager	
Alex Laidler	Planning Officer	

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Data on populations in need	<ul style="list-style-type: none"> • Short-term Lets Impacts on Communities, Scottish Government, October 2019. • Housing Need and Demand Assessment 2 	There is a high level of need and demand for housing across Edinburgh. Impacts on affordability and availability of housing could affect those on lower incomes more.
Data on service uptake/access		N/A
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	<ul style="list-style-type: none"> • Scottish Index of Multiple Deprivation (SIMD) 	<p>Around 29,500 people in Edinburgh live in the most deprived 10% of areas in Scotland.</p> <p>The most deprived communities are in the peripheral areas of the city however the City Centre includes some communities which fall within the most deprived in the city (such as the Old Town and Holyrood) and others which are among the least deprived (such as Queen Street and the West End) in Edinburgh.</p>
Data on equality outcomes	<ul style="list-style-type: none"> • Equal Opportunities: Impact of Short-Term Regulations on Women - ASSC • Frontline (2017). Self-catering in Scotland: the Economic Impact of Short-term Letting on the Scottish Economy. Association of Scotland's Self-Caterers. • Short-term Let Control Area Report of Consultation, December 2021 	<p>Women may be more likely to be involved in short-term letting than men.</p> <p>Those employed in the tourism and related services may be impacted economically.</p> <p>Small, local businesses are a large part of those serving STLs.</p> <p>Families and those with specific needs are key users of STLs.</p> <p>In 2016/17, Airbnb hosts were on average 48 years old in Scotland, five years older than</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<ul style="list-style-type: none"> • Host and Operator Focus Group, 14 October 2021 • Visitor Focus Group, 29 October 2021 • Community Groups Focus Group, 1 November 2021 	<p>the average age in the UK (Airbnb 2017b). Based on the same report, more women operated as Airbnb hosts than men (62% and 38% respectively) and 32% of hosts were self-employed, while 29% were in full-time employment and 15% retired.</p> <p>The majority of hosts (76%) rented their primary or secondary homes and 41% relied on Airbnb income to make ends meet.</p> <p>Accessible -main door housing is in very short supply and needs to be maximised.</p> <p>Different people experience STLs in different ways. Older people may feel more affected by different people coming and going from residential buildings.</p> <p>Elderly people and those who rely on more support within their community may be more affected by impact of STLs on resident population and neighbour support networks.</p>
Research/literature evidence	<ul style="list-style-type: none"> • Report to Planning Committee, 2 March 2017, Short Stay Commercial Visitor Accommodation • Report to Corporate Policy and Strategy Committee, 7 August 2018, Short-term Letting in Edinburgh • Report to Planning Committee, 2 	<p>Reports highlight issues with STLs. This includes impacts on affordability and availability of housing which would affect those on lower incomes more.</p> <p>A Business and Regulatory Impact Assessment prepared by the Scottish Government for the regulations which allow for short-term let control areas has been</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>September 2020, Short-term Letting in Edinburgh</p> <ul style="list-style-type: none"> • Rettie and Co – Analysis of the Impact of the Edinburgh Short Term Rental Market– 16 July 2018 • The City of Edinburgh Council’s Response to the Scottish Government’s Consultation on Short Term Lets 2019 • Short Term Lets Impacts on Communities, Scottish Government, October 2019. • Housing Need and Demand Assessment 2 • Short-term lets: licensing scheme and planning control area legislation Business and Regulatory Impact Assessment (BRIA), Scottish Government, November 2021. • Consultation report on proposals for a licensing scheme and planning control areas for short-term lets in • Scotland 	<p>carried out and identifies costs and benefits for groups.</p> <p>An equalities impact assessment, Children’s Rights and Wellbeing Impact Assessment and assessment against the Fairer Scotland Duty were carried out for the Scottish Government Consultation in planning control areas did not identified any adverse impacts on children or people with protected characteristics.</p>
Public/patient/client experience information	<ul style="list-style-type: none"> • Short Term Lets Impacts on Communities, Scottish Government, October 2019. • Short-term Let Control Area Report of Consultation, December 2021 	Views expressed through the consultation indicate that people with a disability, women, families and those employed in low income jobs may be affected.
Evidence of inclusive engagement of people		N/A

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
who use the service and involvement findings		
Evidence of unmet need	N/A	N/A
Good practice guidelines	Planning Circular 1/2021	No particular group affected.
Carbon emissions generated/reduced data	N/A	N/A
Environmental data	N/A	N/A
Risk from cumulative impacts		No cumulative impacts identified.
Other (please specify)		
Additional evidence required		None

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive</p> <p>Designation of the STL Control Area would bring the use of dwellings for STLs into the planning system, allowing participation of all groups.</p> <p>Would provide a transparent decision making process and improve feeling of control over what happens in communities.</p> <p>Would allow approved policy to be applied to determine acceptability of STLs.</p> <p>Could improve residential amenity and well-being by allowing consideration of impacts through the planning system.</p> <p>Could benefit isolation and improve support network for residents</p> <p>Could improve feelings of personal safety (e.g. unknown and frequently changing occupants) through knowledge that full consideration of impacts would be provided through the planning application process.</p> <p>Could increase housing availability and may make housing more affordable.</p> <p>Would bring STLs onto a similar footing as other types of visitor accommodation in terms of requirement for planning permission.</p>	<p>All groups and all geographic communities. The prevalence of STLs is greatest in more urban areas and could affect urban communities more, however rural semi-rural communities also experience impacts from STLs.</p> <p>Those vulnerable to falling into poverty</p> <p>Visitor accommodation providers.</p>

<p>Negative</p> <p>Potential for a reduced number of STLs which could impact on the requirements for services and affect local employment and well being.</p> <p>Requirement to engage in statutory planning system may be seen as a barrier to some people.</p> <p>There may be financial impacts for operators.</p> <p>Potential to impact on people's ability to utilise their property in a particular manner.</p>	<p>Business community/ Those vulnerable to falling into poverty</p> <p>People with low literacy, English not first language, low income.</p> <p>Property owners/ Economically disadvantaged</p> <p>Property owners</p>
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<p>Environment and Sustainability including climate change emissions and impacts</p> <p>Positive</p> <p>Could result in less air travel to Edinburgh.</p> <p>Could have positive effects on noise through planning application process and consideration of impacts.</p> <p>May provide a more pleasant residential environment</p> <p>Negative</p> <p>Could push STLs outwith the Council area and increase travel into the city.</p> <p>Could impact on quality of housing and appearance of areas if owners no longer generating income from STL use and lack of incentive for them to maintain.</p>	<p>Affected populations</p> <p>All groups.</p> <p>All groups</p> <p>All groups</p> <p>All groups</p>
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<p>Economic including socio-economic disadvantage</p> <p>Positive</p> <p>Could increase availability of housing and improve affordability.</p>	<p>Affected populations</p> <p>Those on low income and in housing need.</p>
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<p>Through reduction in visitor numbers there may be potential for services to be more focussed on meeting needs of residents in the local area.</p> <p>Could increase cost for those using STLs if supply was reduced and there was high demand.</p> <p>Requirement for planning permission could increase the demand for planning consultancy services from the business community.</p> <p>Through clarification of commercial status of STLs could have positive impact on council waste services.</p> <p>Negative Could result in some people no longer able to rent out properties for short-term letting impacting on their income.</p> <p>Potential to impact on tourism and economy if it results in a reduction in needed accommodation which affects tourism numbers or employment opportunities which may affect the amount of money being spent in local area by residents and visitors.</p> <p>Any reduction in the number of STLs could potentially result in a reduction in demand from local businesses. Demand from an increase in residents replacing visitors could result in a neutral impact.</p> <p>Could have an impact on demand for schools if STLs were returned to residential use.</p>	<p>Those experiencing deprivation.</p> <p>STL users.</p> <p>Business Community</p> <p>All residents</p> <p>Property Owners</p> <p>Tourism sector and those employed in that sector or in supporting services. Local businesses</p> <p>Local business</p> <p>Local Authority</p>
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9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

N/A

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

A consultation action plan was prepared for the proposal. Section 3 above sets out the consultation/communication that has taken place to date. An update of this will be prepared should designation be taken forward. This will include statutory advertising and notification to stakeholders and residents.

11. Is the policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a [Strategic Environmental Assessment](#) (SEA) will be required and the impacts identified in the IIA should be included in this.

No significant environmental effect is expected from the proposal. The proposal would remove the ambiguity over whether planning permission is required. The policy which will be applied to such decisions has been subject to SEA as part of the local development plan process.

In relation to the introduction of the powers to designate a short-term let area of control a pre-screening notification was issued to the Scottish Government on 9 October 2020 with the following brief summary of the likely environmental consequences:

These new powers provide local authority with the means to manage short-term lets in order to improve safety and to try to provide a quality experience for visitors. It is our view that new powers would have no impact on most environmental receptors. Those receptors such as Human Health, Population and material assets which are likely to experience some positive effects from these new powers are still considered to be safely within the minimal threshold and therefore exempt from Strategic Environmental Assessment as per Section 7 of the Environmental Assessment (Scotland) Act 2005.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

No further evidence required.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Develop a communications plan should designation proceed.	Lindsay Robertson, Senior Planning Officer.	In line with any designation timescale	Feb 2023

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

Should the proposal be implemented it will be open to review the designation at a future date. Scottish Government Circular 1/2021 suggest that this should be aligned with any review of a local development plan.

16. Sign off by Service Director

Name Peter Watton

A handwritten signature in cursive script that reads "Peter Watton". The signature is written in black ink on a white background.

Date 23 February 2022

17. Publication

Completed and signed IIAs should be sent to strategyandbusinessplanning@edinburgh.gov.uk to be published on the IIA directory on the Council website www.edinburgh.gov.uk/impactassessments