

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

1. Title of proposal

Non-Statutory Guidance for Businesses – Short Term Let (STL) Further Guidance Update

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

The guidance is a material consideration in determining planning applications. This update expands on existing guidance provided in the document with further information on the considerations when assessing a planning application for STL use.

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

The guidance update has been subject to an online consultation for from 29 September to 22 December 2022. In addition to three focus groups with hosts/operators, community groups and amenity bodies, operators of Edinburgh Fringe Festival and an ‘in-person’ drop-in session.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

No

5. Date of IIA

01 March 2023

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Elizabeth McCarroll	Team Manager	25 August 2021
Jackie McInnes	Senior Planning Officer	25 April 2018 3 May 2018 20 June 2018

Name	Job Title	Date of IIA training
		5 September 2018 8 November 2018 18 May 2022 14 December 2022
Lynsey Townsend	Senior Planning Officer	
Damian McAfee	Senior 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 and to the environmental impacts of your proposal
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	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 – ASSC 	<p>Hosts/Operators - In 2016/17, Airbnb hosts were on average 48 years old in Scotland, five years older than the average age in the UK (Airbnb 2017b).</p> <p>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. The majority of hosts (76%) rented their primary or secondary homes and 41% relied on Airbnb income to make ends meet.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<ul style="list-style-type: none"> • Short-term Let Control Area Report of Consultation, December 2021 • STL Operators Focus Group 25.10.2022 • Residents/Neighbourhood Groups & Amenity Bodies Focus Group 27.10.2022 • Festival Organisations Focus Groups 01.11.2022 • Face to Face Drop-in Session 09.11.2022 • Guidance for Businesses: STL Update Consultation December 2022 	<p>Consultation responses indicate there are hosts/operators which need flexible work due to caring responsibilities and/or health issues making other employment difficult to sustain.</p> <p>Small, local businesses are a large part of those serving STLs.</p> <p>Families and those with specific needs (e.g employment purposes, accessing health services, require temporary accommodation) are key users of STLs.</p> <p>Accessible -main door housing is in very short supply and needs to be maximised. Different people experience STLs in different ways.</p> <p>Older people may feel more affected by different people coming and going from residential buildings. 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> <p>Vulnerable people and woman in the resident population may feel more affected by different people coming and going from residential buildings and this impacting on feeling of safety.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Research/literature evidence	<ul style="list-style-type: none"> • Report to Corporate Policy and Strategy Committee, 7 August 2018, Short-term Letting in Edinburgh • Report to Planning Committee, 2 September 2020, Short-term Letting in Edinburgh • Short-Term Lets Impacts on Communities, Scottish Government, October 2019. • 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 • Edinburgh Visitor Accommodation Sector Commercial Needs Study • Planning Committee Report 23 February 2022: Short Term Let Area of Control Designation, including Consultation Report, Statement of Reasons and Background Report 	<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>Reports highlight issues regarding personal and community safety of residents and STL guests due lack of regulation prior to introduction of the licensing scheme and the short-term let control area. Poorly maintained or managed STLs would affect all 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 identify any adverse impacts on children or people with protected characteristics.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<ul style="list-style-type: none"> • NPF 4 Final Business and Regulatory Impact Assessment • 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 • Housing Need and Demand Assessment 2 • Guidance for Businesses: STL Update Consultation December 2022 	
Public/patient/client experience information	<ul style="list-style-type: none"> • Short Term Lets Impacts on Communities, Scottish Government, October 2019 • Planning Committee Report 23 February 2022: Short Term Let Area of Control Designation, including Consultation Report, Statement of Reasons and Background Report • Guidance for Businesses: STL Update Consultation December 2022 	Views expressed through the consultation indicate that people with a disability, women, families, older people, and those employed in low income jobs may be affected.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Evidence of inclusive engagement of people who use the service and involvement findings	<ul style="list-style-type: none"> • STL Operators Focus Group 25.10.2022 • Residents/Neighbourhood Groups & Amenity Bodies Focus Group 27.10.2022 • Festival Organisations Focus Groups 01.11.2022 • Face to Face Drop-in Session 09.11.2022 • Guidance for Businesses: STL Update Consultation December 2022 	<p>Views expressed through the consultation indicate that people with a disability, women, families, older people, and those employed in low-income jobs may be affected by a reduction in STLs.</p> <p>Views expressed through the consultation indicate that people with a disability, women, families, older people, and those employed in low-income jobs may be affected by STLs impacting on housing availability and affordability</p>
Evidence of unmet need	N/A	N/A
Good practice guidelines		
Carbon emissions generated/reduced data	N/A	N/A
Environmental data	N/A	N/A
Risk from cumulative impacts	<ul style="list-style-type: none"> • Residents/Neighbourhood Groups & Amenity Bodies Focus Group 27.10.2022 • Festival Organisations Focus Groups 01.11.2022 • Face to Face Drop-in Session 09.11.2022 	Views expressed through the consultation indicate that cumulative impact of regulation on STLs will result in a reduction of STLs impacting on businesses, particularly those linked to the tourism industry. As identified above, this may affect woman, disabled, those on low-incomes and older people.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<ul style="list-style-type: none"> Guidance for Businesses: STL Update Consultation December 2022 	
Other (please specify)	N/A	N/A
Additional evidence required	N/A	N/A

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>Non-statutory guidance provides applicants and the public with information on the amenity factors taken into consideration when determining a planning application. The Report of Handling will detail the justification for the decision. This increases the level transparency in the decision-making process.</p> <p>Guidance could improve residential amenity, well-being, personal and community safety.</p> <p>May improve the feeling of community within areas and sustainable communities.</p> <p>Guidance could have a positive impact on the availability of homes if operators move from STL use to long-term residential use. This may impact on affordability of housing.</p>	<p>All groups and all geographic communities</p> <p>All groups within the resident population</p> <p>Those vulnerable to falling into poverty and in low-income employment</p>
<p>Negative</p> <p>Potential for a reduced number of STLs which could impact on the requirements for services in relation to STLs and affect local employment and well-being.</p> <p>There may be financial impacts for operators.</p>	<p>Businesses community/ those vulnerable into poverty</p> <p>Operators/owners</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Potential to impact on people's ability to utilise their property in a particular manner.</p> <p>Reduces choice and flexibility of accommodation available to visitors and tourists across the city.</p>	<p>Property owners/ economically disadvantage</p> <p>Those in low-income employment/ business community/ low income (guests)/ those with disabilities.</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive</p> <p>Could result in less travel to Edinburgh by visitors/tourists.</p> <p>Potential increase in long-term housing availability may have a positive impact in housing need and demand resulting in less land being required for development.</p> <p>May provide a more pleasure residential environment</p> <p>May encourage more local living from residents, improving communities and local services.</p>	<p>All groups</p> <p>All groups</p> <p>All groups</p> <p>All groups</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>STL users/ business community/ those in low-income employment</p> <p>Those in low-income employment/ residents</p>

Economic	Affected populations
<p>Positive</p> <p>Could increase availability of housing and improve affordability.</p>	<p>Those experiencing deprivation/ in low-income employment/ those vulnerable to falling into poverty.</p>

Economic	Affected populations
<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>If there is an increase in residential accommodation in the city, this may have a positive impact on employment opportunities within areas other than tourism within the Edinburgh economy.</p>	<p>Those experience deprivation.</p> <p>Business community/ those in low-income employment/ residents</p>
<p>Negative</p> <p>Could increase cost for those using STLs if supply was reduced and there was high demand.</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.</p> <p>Could have an impact on demand for local services (e.g schools, health care services) if STLs are returned to residential use.</p>	<p>STL users/ families/ disabled/ those in low-income employment</p> <p>Business community/ tourism sector/ those in low-income employment</p> <p>Local businesses</p> <p>Local Authority/ NHS/ All residents</p>

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.

The guidance provides information to applicants and members of the public on how policy is applied to a planning application for STL use. The Council’s website will be updated and communicated through a Planning Blog post.

- 11. Is the plan, programme, strategy or 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. See section 2.10 in the Guidance for further information.**

No significant environmental effect is expected from the proposal. The policy which will be applied to such decisions has been subject to a SEA as part of the development plan process.

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
Monitor decisions and appeal outcomes insofar as the guidance being applied.	Elizabeth McCarroll Planning Team Manager	Ongoing	In line with non-statutory guidance review – Feb 2024

- 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, non-statutory guidance is reviewed on an annual basis, feedback and the outcome of planning appeal decisions form part of that review.

16. Sign off by Service Director



Name Peter Watton

Date 20 March 2023

17. Publication

Completed and signed IIAs should be sent to:

integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care

sarah.bryson@edinburgh.gov.uk to be published at www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/