

# Integrated Impact Assessment – Summary Report

---

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

## 1. Title of proposal

Housing Revenue Account (HRA) Budget Strategy 2024-2034

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

The HRA Budget Strategy 2024-34 aims to continue the previous investment strategy to improve existing homes, deliver new affordable homes and net zero carbon emissions from Council housing. The capital investment is accompanied by the Housing Service Improvement Plan (HSIP) that aims to increase customer satisfaction, improve efficiency and reduce costs.

Each year the views of Council housing tenants are sought on the HRA budget strategy, investment plans, services and associated rent levels, which informs the 2024/25 one-year revenue budget, a five-year capital programme and ten-year investment plan.

This year's consultation sought to agree a five-year rent strategy and the associated investment that could be achieved. The last few years have provided a lot of uncertainty and financial instability for tenants. It has also made financial planning in the medium to long term very challenging. Most of the capital investment projects takes an average of 12-18 months to plan, design and consult, followed by another year or so for the construction work on site. It has been extremely challenging to plan and deliver such programmes, whilst responding to annual rent fluctuations. In response, it was proposed to consult tenants for three rent increase options as part of the five-year rent strategy:

- 4.1% p.a. for 5 years to deliver 2023/24 approved investment plan of 2,000 new social rented homes and upgrade c.5,200 to be modern and energy efficient as new homes over the next 10 years.
- 5% p.a. for 5 years to align the projected inflation in 2024/25 and to deliver 2,300 new social rented homes and upgrade c.5,800 to be modern and energy efficient as new homes over the next 10 years.
- 8.4% p.a. for 5 years to deliver the pre-Covid investment plan of 3,560 new social rented homes and upgrade c.12,400 to be modern and energy efficient as new homes over the next 10 years.

On 3 October 2023, Housing, Homelessness and Fair Work Committee considered the [Housing Revenue Account Budget Strategy 2024/2025](#) report in advance of the annual rent consultation with tenants. The report highlighted the significant increase in HRA expenditure since the 2023/24 budget was approved, reducing the financial capacity of the HRA substantially to fund long-term investment.

In addition to the three rent increase proposals, Committee agreed to consult with tenants on whether higher rents should be charged for newly built and/or newly

modernised homes that have been upgraded to EESSH2. Tenants were also asked about their experience of getting advice and help to pay their rent to help informing future policy and service development.

The proposals set out in the consultation took into account the increases in costs that were known at that time (September/October 2023). Following an up-to-date assessment of all expenditure and income drivers, and associated assumptions for 2024/25 (since Committee), this has resulted in changes to the position reflected in the consultation. The 8.4% rent increase over five years can still ensure 12,400 homes can be brought up to EESSH2 and 3,560 new social rented homes build over the next 10 years. The 4.1% and 5.0% rent increases now require the capital investment programmes to be elongated from 10 to 15 years to be able to bring 5,200 or 5,800 homes respectively up to EESSH2 and the delivery of 2,300 or 2,000 new social rent homes.

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

A brief summary for the consultation plan was discussed with members of the Edinburgh Tenants Federation (ETF) at a meeting on 15 September 2023. ETF members suggested ways to promote the rent consultation and content to be included in the rent consultation document/ booklet.

The consultation proposal was reviewed by the in-house Consultation Advisory Panel (on 19 September 2023) to ensure the consultation proposal is of a good practice standard and that the communication approach is appropriate.

The Housing Revenue Account Budget Strategy 2024/25 consultation report was considered by the Housing, Homelessness and Fair Work Committee on 3 October 2023.

This year's consultation ran between 9 October and 17 December 2023. A consultation booklet was posted to every tenant as part of the Tenants' Courier newsletter, where the tenant could respond to the postal survey printed on the back of the booklet using the freepost return envelope provided. Tenants could also respond to the consultation survey online through the Council's Consultation and Engagement Hub. The consultation was promoted by Housing Officers (in person and via email footers), targeted social media posts, press releases and leaflets in localities. Where an email address is available, tenants were sent an email reminder to complete the online consultation survey in the last week of the consultation period.

The rent consultation received a total of 1,159 postal and online responses. This was the highest number of responses ever received and was a 160% increase from the previous high of 445 responses received for the 2022/23 rent consultation.

The rent consultation was complemented by a phone survey with 1,000 tenants, carried out by an independent research company commissioned by the Council. The Council provided a random sample of tenants contact details to the research company, weighted by locality and property type to be an accurate representation of our tenant group.

After the removal of duplicated entries from tenants who responded through the online/ postal survey as well as the commissioned phone survey, just under 2,100 (c.10% of all tenants) responses were considered.

Of the three rent increase options consulted on, around two thirds of respondents (66%) voted for a 4.1% p.a. rent increase for five years, with 25% of respondents voting for a 5.0% p.a. and 9% voting for 8.4% p.a. for five years.

Comments from tenants showed that there was understanding of the need to increase rents to pay for the increased costs. However, financial pressure from the cost-of-living crisis and affordability remained a concern to some tenants. Some tenants felt that rent should only be increased if the standards of homes, repairs and services were improved.

Nearly 60% of the respondents agreed that the Council should consider charging a higher rent for new built homes (26%), newly modernised homes (3%) or both new built and newly modernised homes (29%). While there was general support for continuing investment on building new homes, tenants believed investment priority should be given to improving existing homes.

The rent consultation found that just over a third (34%) of the respondents had found it more difficult to pay their rent over the last 12 months, but only 42% of them had sought advice or help to assist with paying the rents. For those who had sought advice or help, the majority (55%) were very or fairly satisfied that the assistance they received met their needs, compared to 24% who were very or fairly dissatisfied. The remaining 21% were neither satisfied nor dissatisfied. Tenants commented that it was important to promote the advice and support available regularly and that the information needed to be more accessible.

On 11 January 2024, officers met with members of the Edinburgh Tenants Federation (ETF) Executive Committee to present the budget consultation and initial findings of the consultation outcomes. ETF members provided similar feedback as those found in the consultation survey, while expressing concerns that a five-year strategy was too long to be committed to and that the consulted rent increase options were too high.

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

Yes, the budget strategy includes the preparation of an annual budget for the HRA. The budget strategy aims to deliver the Council's commitments, including increasing the supply of new affordable homes, which helps to meet people's housing needs, including homeless households, and improving existing homes to meet Energy Efficiency Standard for Social Housing 2 (ESSH2) to help tackle fuel poverty/cost of living. The proposed continuation of the Tenant Hardship Fund (THF) aims to support tenants experiencing significant financial hardship due to the rent increase.

**5. Date of IIA**

The draft/interim IIA meeting was held on 21 September 2023.

The final IIA meeting was held on 8 February 2024 following the conclusion of the budget consultation.

**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)**

**For the Interim IIA meeting on 21 September 2023**

<b>Name</b>	<b>Job Title</b>	<b>Date of IIA training</b>
Ada Yiu (report writer)	Senior Housing Development Officer	
Andrew Gorus (facilitator)	Housing Development Officer	7 Sep 2022
Douglas Alexander	Senior Housing Development Officer	
George Norval	Housing Operations Manager	
Lisa Mallon (Lead Officer)	Enabling & Partnerships Operations Manager	
Samantha Reeves	Senior Housing Development Officer	

**For the final IIA meeting on 8 February 2024**

<b>Name</b>	<b>Job Title</b>	<b>Date of IIA training</b>
Ada Yiu (report writer)	Senior Housing Development Officer	
Andrew Gorus (facilitator)	Housing Development Officer	7 Sep 2022
Douglas Alexander	Senior Housing Development Officer	
Lisa Mallon (Lead Officer)	Enabling & Partnerships Operations Manager	
Massimo Fabbreschi	Housing Development Officer	
Samantha Reeves	Senior Housing Development Officer	

**7. Evidence available at the time of the IIA**

<b>Evidence</b>	<b>Available – detail source</b>	<b>Comments: what does the evidence tell you with regard to different groups who may be affected?</b>
Data on populations in need	Yes South East Scotland Housing Need and Demand Assessment 3 (SESplan HNDA3)	The latest HNDA3 which received robust and credible status in July 2022, shows the need for between 36,000 to 52,000 homes in Edinburgh between 2021-2040. It is estimated that between 24,000 to 35,000 of those homes should be affordable.
Data on service uptake/access	Yes EdIndex and Key to Choice data and Annual Return on the Charter 2022/23	In 2022/23, there were 23,516 applications on EdIndex, Edinburgh's common housing register. There is high demand for housing with an average of 197 households bidding for each available home advertised on the Key to Choice system.  In 2022/23, the Council let 946 homes (excluding mutual exchanges):

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"> <li>- 142 (15.0%) lets to existing tenants</li> <li>- 131 (13.8%) lets to housing list applicants; and</li> <li>- 673 (71.1%) lets to homeless applicants.</li> </ul> <p>There is a high demand for social rented homes in Edinburgh and a high percentage of available homes are let to homeless households.</p>
<p>Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.</p>	<p>Yes Scottish Index of Multiple Deprivation (SIMD)</p> <p>THF management data</p> <p>Scottish House Condition Survey (SHCS)</p>	<p>The SIMD data shows that many of the Council homes are situated in the most deprived areas in the City / Scotland. The rent increase options for consultation have considered the affordability of tenants.</p> <p>The Scottish Government’s ‘Rent affordability in the affordable housing sector’ report states that <i>‘Based on research, a rent can be considered affordable when housing costs do not consume more than 30-40% of households’ incomes’</i>. Taking into account the three consulted rent options and increases over the next five years and basing income on full time minimum wage (with 2% annual uplifts), all three rent options would be less than 35% (two bed average rent) of household income.</p> <p>About 70-80% of the tenants get help through Housing Benefits or the Universal Credit housing element to pay for their rents. A Tenant Hardship Fund (THF) was set up in April 2023 to help tenants facing financial difficulties, including those who cannot access benefits. In the first nine months (April to December 2023) of introduction, the THF received a total of 2,180 applications. Over £394,000 (c.60% of the budget) fund has been paid to tenants of approved applications.</p> <p>The SHCS data shows that the social housing sector has the highest level of fuel poverty. The budget strategy aims to improve the energy efficiency of Council</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>Energy Advice Service monthly monitoring</p> <p>Income Maximisation Service management data</p>	<p>homes by achieving EESSH2, which helps to tackle fuel poverty. The HRA funds a dedicated energy advice service which supported 1,538 tenants in 2023/24 (Feb 2023 to Jan 2024), resulting in c.£296,000 of financial savings to tenants.</p> <p>Between April 2023 and January 2024, there were 388 referrals from housing staff localities made to the Income Maximisation Service and in total this helped to bring in an extra c.£146,000 income to tenants.</p>
Data on equality outcomes	Accessible Housing Study 2022	<p>As part of the Accessible Housing Study, 92% of online and telephone survey respondents were very or fairly satisfied with their home and how it meets their needs, with other issues such as repairs/maintenance and affordability also playing a part in satisfaction. In a different question, 83% said their home was suitable or very suitable for meeting the needs of their household now, compared to a figure of 89% saying their home was suitable or very suitable for meeting their household needs when they first moved into their home.</p> <p>42% of households with a health condition or disability state that their current home does not meet the needs of the household. Furthermore, 53% of households with a health condition or disability are having trouble managing stairs at home.</p> <p>Based on self-assessment, at least a third of households with a health condition or disability currently need adaptations to make their home more suitable for the needs of their household; suggesting a key role for in-situ solutions in improving the accessibility of the homes in the city.</p>
Research/literature evidence	Yes	Data on existing stock condition, design principles and health and safety reviews on high rise blocks have been used to inform the budget and programme in

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		relation to improving the condition of existing homes and estates.
Public/patient/client experience information	<p>Yes</p> <p>2024/25 rent consultation</p> <p>Accessible Housing Study 2022</p>	<p>Information from an extensive programme of consultation and engagement with tenants - including the annual survey, focus groups, tenant panels, tenant led service inspection and scrutiny, resident and community meetings – confirms that tenants have consistently demonstrated strong support for the investment plan.</p> <p>Comments from tenants who took part in the rent consultation survey showed that there was understanding of the need to increase rents to pay for the increased costs. However, financial pressure from the cost-of-living crisis and affordability remained a concern to some tenants. Some tenants felt that rent should only be increased if the standards of homes, repairs and services were improved.</p> <p>While there was general support for continuing investment on building new homes, tenants who responded to the rent consultation survey believed investment priority should be given to improving existing homes.</p> <p>Tenants also commented that it was important to promote the advice and support available regularly and that the information needed to be more accessible.</p> <p>On 11 January 2024, officers met with members of the Edinburgh Tenants Federation (ETF) Executive Committee to present the budget consultation and initial findings of the consultation outcomes. ETF members provided similar feedback as those found in the consultation survey, while expressing concerns that a five-year strategy was too long to be committed to and that the consulted rent increase options were too high.</p> <p>The Accessible Housing Study was informed by primary research of 400</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>telephone interviews and an online survey with 266 valid responses. It was also complemented by a service user consultation by interviewing nine service users and stakeholder engagement feedback.</p>
<p>Evidence of inclusive engagement of people who use the service and involvement findings</p>	<p>Yes</p> <p>2024/25 rent consultation</p>	<p>Information from an extensive programme of consultation and engagement with tenants – including the annual survey, focus groups, tenant panels, tenant led service inspection and scrutiny, resident and community meetings – confirms that tenants have consistently demonstrated strong support for building new homes, and improving homes and services that reduce their cost of living.</p> <p>For this year’s rent consultation, a consultation booklet was posted to every tenant as part of the Tenants’ Courier newsletter, where the tenant could respond to the postal survey printed on the back of the booklet using the freepost return envelope provided. Tenants could also respond to the consultation survey online through the Council’s Consultation and Engagement Hub. It ensures every tenant has an opportunity to participate and respond to rent consultation.</p> <p>As part of the rent consultation, a telephone survey was conducted with 1,000 randomly chosen tenants. The survey questions were read out to participants and therefore there were no concerns regarding literacy. In the event that a tenant did not speak English, the market research company would ask if there was anyone in the home who could interpret on their behalf and if not, they would call back with an interpreter. However, this is not an issue regularly encountered in carrying out the survey.</p> <p>The consultation was promoted by Housing Officers (in person and via email footers), targeted social media posts, press releases and leaflets in localities.</p>



Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>Tenant Survey 2021</p> <p>Accessible Housing Study 2022</p>	<p>Where an email address was available, tenants were sent an email reminder to complete the online consultation survey in the last week of the consultation period.</p> <p>According to the Tenant Survey 2021, 99% of tenants were satisfied with the opportunities given to them to participate in the Council’s decision-making process (as a landlord).</p> <p>All communication materials meet accessibility standards. Printed information includes “Happy to Translate” reference numbers for tenants who wish to access information in other languages and/or formats. Online information is also accessible for those who are sight impaired through the “Read Aloud” function.</p> <p>As part of the Accessible Housing Study, the consultant carrying out the research worked with partners delivering health, social care and housing services to encourage participation in the research, as well as third sector disability support and advocacy groups. In total nine service users were interviewed. In advance of the interviews a short video was issued to participants to explain the background to the project and the aims and objectives of the study.</p>
Evidence of unmet need	<p>Yes</p> <p><a href="#">Homelessness in Scotland: 2022-23</a></p> <p>Energy Advice Service monthly monitoring</p> <p>EdIndex and Key to Choice data</p>	<p>The Council received 3,506 homelessness application in 2022/23; the first increase following the pandemic and back to the pre-Covid level of 3,567 in 2019/20.</p> <p>The Energy Advice Service had a waiting list of 91 households as of 1 February 2024. The service has received an additional £158,000 funding at start of 2023 from the HRA to increase capacity as demand has increased.</p> <p>In 2022/23, there were 23,516 applications on EdIndex, Edinburgh’s common housing register, of which 567</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>applicants were awarded with Gold priority and 5,892 applicants with Silver - Homeless priority. There is high demand for housing with an average of 197 households bidding for each available home advertised on the Key to Choice system.</p>
Good practice guidelines	Yes Scotland Housing Network, HouseMark and Housing Quality Network	<p>Information and practice exchange forum to inform good practice on new housing developments and housing asset management, as well as business planning and budget setting.</p> <p>When developing options for this year's rent consultation, a survey with SHN members was carried out in relation to new build premium rents.</p> <p>The Council took part in the SHN's survey on rent increase proposals/ consultation options and received the output report for the survey, including information from 19 local authority landlords (inc. CEC) and 45 Registered Social Landlords.</p> <p>There are regular discussions with other landlords, through forums such as Development Directors Forum or one-to-one discussion on specific issues.</p>
Carbon emissions generated/reduced data	Yes	<p>Since November 2020, all new build Council homes have been designed to achieve net zero carbon. Also, pilots are underway in two new build developments using offsite construction principles which have the potential to reduce construction site emissions.</p> <p>A significant level of intervention in existing homes is required to deliver advanced whole house retrofit to meet statutory requirements for energy efficiency and net zero carbon. The whole house retrofit pilot will focus on ten of the most common building types across the Council estate. Phase 1 of the whole house retrofit pilot programme commenced construction at the end of October 2023, including sites at Gilmerton</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>Dykes Crescent, Southhouse Avenue and Burdiehouse Drive.</p> <p>The Sustainable Procurement Strategy (revised in September 2023) supports the delivery of the Council’s Business Plan. In addition to drive forward the focus on Fair Work First, local spend and community benefits, it aims to help reach the net zero 2030 target through embracing new technologies and ways of delivering services through close working with key partners.</p> <p>Scottish Government is consulting on a new Social Housing Net Zero Standard (SHNZS) in Scotland between 28 November 2023 and 8 March 2024. This new standard will replace the EESSH2. It includes a proposal for a “fabric efficiency rating”, which measures space heating (and hot water demand) in kWh/m<sup>2</sup>/year, which is equivalent to current EPC rating between B and C. The proposed investment programme aims to bring existing homes to meet the “current” EESSH2, a minimum EPC B, and would help to deliver significant carbon reductions.</p> <p>All of the above measures for both new build and existing homes will also have a positive impact on tenants lives and will help to ensure homes are better ventilated and thus have improved indoor air quality, reduced heating demand and reduced energy costs and more comfortable living conditions.</p> <p>An Energy Advice Service is also in place and will continue to be provided to all Council tenants. The current EAS which has been running since 2018 and every year has engaged with approx.1,200 Council tenants. The service was expanded in February 2023 with an additional £158,000 in funding, which increased the capacity of the service so that it could help to support even more</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>tenants through the current energy crisis and beyond. Between February 2023 and January 2024, the service supported 1,529 tenants, and helped to deliver c.£296,000 financial savings to tenants and c.300,000 kg of carbon savings.</p>
Environmental data	Yes	<p>As a result of the pandemic, EESSH1 compliance was significantly disrupted due to site closures and an inability to access tenants' homes for internal works. Despite this, almost 80% of Council homes now meet the EESSH1 standard, and over 12% of homes now meet the much more ambitious EESSH2 standard.</p> <p>Over the last 12 years, over 800 mostly small scale locally nominated Neighbourhood Environment Projects (NEPs) have been delivered throughout the city on housing account land. Investment has helped improve under-utilised open space and thoroughfares, tired fencing and prepared land for community growing. Following extensive engagement with community partners, Ward Councillors and Council officers during 2022, a new approach to delivering small to medium scale local estate improvement projects has been developed. The new approach will deliver quicker, more responsive improvements and a more comprehensive approach to larger scale improvements.</p> <p>The Housing Operations Estates Improvement Programme (EIP) focuses on investment to both soft and hard landscaping, improvements to communal gardens, preparation for community growing areas and upgrades to housing facilities and public realm.</p> <p>As part of the EIP, the Council will harness opportunities to deliver greener, more climate friendly and biodiverse projects, using natural materials and improved drainage. We will also work with our communities and partners to</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>increase the numbers of native tree varieties including fruit trees throughout our Housing land assets.</p> <p>The Community Gardens project is into its third year, with its first full growing happening in 2023. In the time since its inception, support has been provided to the 40+ existing community gardens across the city, with a further three new community gardens being set up in the Hutchison, Muirhouse and Craigmillar areas. Project achievements include getting over 100 new people involved in community growing, providing new facilities to allow the harvesting of 7,000 litres of rainwater, providing 10 new composting facilities, building and/or replaced 92 raised beds, and giving work experience opportunities to both younger and older volunteers.</p>
Risk from cumulative impacts	Yes	<p>The costs-of-living crisis means that tenants are facing increasing costs in all aspects of their daily lives. In additions, Council Tax and service charges are also likely to increase.</p> <p>However, 70% to 80% of tenants each year receive assistance with their rent payment responsibilities through Housing Benefit or the housing element of Universal Credit. Any increase in the rent charge is proportionately covered by a corresponding increase in the benefit received if there are no other changes in the household circumstances.</p> <p>Fees and charges for additional services provided as part of tenancies (e.g. stair cleaning, communal heating, furnished tenancies, etc) have been frozen for seven years prior to the increase in 2023/24. The majority of these charges cannot be covered by benefits and therefore provide a direct financial saving to tenants. Fees and charges, except for the communal heating and heat with rent charges, will be increased at the same</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>rate as the rent increase agreed by Council, but capped at 5.0%, which is the default increase for Council’s general fund service charges. Heating charges will be frozen in 2024/25 while a detailed review is being carried out.</p> <p>Three annual rent increase options for each of the following five years were consulted with tenants: 4.1% p.a. to deliver the 2023/24 approved investment plan; 5.0% p.a. to align to an inflationary increase; and 8.4% p.a. to deliver the pre-COVID investment plan.</p> <p>The Scottish Government’s ‘Rent affordability in the affordable housing sector’ report states that <i>‘Based on research, a rent can be considered affordable when housing costs do not consume more than 30-40% of households’ incomes’</i>. Taking into account the three consulted rent options and increases over the next five years and basing income on full time minimum wage (with 2% annual uplifts), all three rent options would be less than 35% (two bed average rent) of household income.</p> <p>The rent increase would support different levels of capital investment regarding building more affordable homes and bringing existing homes to meeting ESSH2 standards. Without the rent increase (or significant increase from government grant funding), the capital investment would have to be elongated and reduced significantly.</p> <p>As part of a mitigation to the proposed rent increase, officers proposed to continue the Tenant Hardship Fund to help tenants experiencing financial hardship; including those who cannot access benefits.</p>
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?**

<b>Equality, Health and Wellbeing and Human Rights</b>	<b>Affected populations</b>
<p><b>Positive</b>            Prioritising investment in services and improvements that reduce the cost of living for tenants will have a significant financial benefit for tenants who are under financial pressure.</p> <p>Investing in existing homes and neighbourhoods means that tenants benefit from improvements to their homes, regardless of where they live in the city.</p> <p>Investment in Community Gardens will help to maintain and create quality spaces for local communities to use, in turn helping to improve health and wellbeing by encouraging tenants to get outdoors, get active, to develop new skills, and to grow their own fruit and vegetables.</p> <p>Investment in new homes and partnership working as part of Health and Social Care integration will help increase the supply of homes built specifically for older people or people with complex health needs.</p> <p>The grant funding affordable housing supply programme (AHSP), including the Council house building programme, ensures 10% of all new homes will be built to wheelchair accessible standards. A proportion of new homes will be built specifically for older people and people with complex health needs. The Council continues to provide medical adaptations to the homes of tenants who require them.</p> <p>In recent months, the Council has made improvements to the management of dampness, mould and condensation cases, including a more robust process for reporting, response times, repairs and communication from Housing Operations.</p>	<p>Council tenants</p> <p>People seeking affordable housing</p> <p>Older and/or disabled people requiring adaptation to their current homes; or to move to a specially adapted/designed homes.</p> <p>City-wide</p> <p>Tenants affected by dampness, mould and condensation</p>
<p><b>Negative</b>            The proposed rent increase may have a disproportionate impact on tenants not receiving assistance with their rent, increasing the financial challenge faced by the tenants, and the associated the stress/ anxiety, affecting their mental health. As part of the mitigation to any rent increase, officers are proposing to continue the Tenant</p>	<p>Tenants not in receipt of benefits to help with paying their rent</p>

<p>Hardship Fund to help tenants experiencing financial hardship; including those who cannot access benefits.</p> <p>In addition, the Income Maximisation Service helps tenants to check their welfare entitlements. Between April 2023 and January 2024, the service received 388 referrals from housing officers in the localities and helped to generate c.£146,000 extra income for tenants.</p> <p>The Energy Advice Service supported 1,538 tenants in 2023/24 (Feb 2023 to Jan 2024), resulting in c.£296,000 of financial savings to tenants.</p> <p>The Council has worked with key agencies to deliver a network of crisis support to tackle the impacts of the cost of living crisis. It also adopted a cash-first approach for people facing financial hardship, whilst also offering a range of holistic support and advice.</p>	
---	--

<p><b>Environment and Sustainability including climate change emissions and impacts</b></p> <p><b>Positive</b></p> <p>The Whole House Retrofit programme will ensure all existing homes achieve high energy efficiency standards (e.g. EESSH2), meeting the Council’s net zero commitment.</p> <p>The Mixed Tenure Improvement Service aims to improve the common area of mixed tenure blocks, including the external fabric which helps to improve the energy efficiency of the buildings.</p> <p>The Council led house-building programme seeks to maximise delivery of homes on brownfield sites, reducing pressure on Edinburgh’s green belt. New homes are built to high standards in terms of energy efficiency and sustainability.</p> <p>The Energy Advice Service provides advice and information to Council tenants to operate heating systems efficiently, applying for grants and loans which help to alleviate fuel poverty and reduce carbon emissions.</p> <p>Investment in community gardens will encourage sustainable food growing and community cohesion.</p> <p>There are positive impacts on adaptations, carbon emissions and sustainable development arising from the investment programme.</p> <p>As part of the Housing Operations, Estate Management Services review, opportunities have arisen to work with</p>	<p><b>Affected populations</b></p> <p>Council tenants and relevant owners, e.g. owners in mixed tenure blocks</p> <p>City-wide</p>
--	--



both Edinburgh Council's Thriving Greenspace Team and the Million Tree Project to ensure that housing land in proximity of park open space is also considered for essential investment and that increasing numbers of community trees remains at the forefront in our designs for wider estate improvements as part of EIP.

The Sustainable Procurement Strategy supports the Council's business plan, with one of its key objectives being contributing to the Council's 2030 net zero target. Council officers and external partners will work together to deliver opportunities that help address the climate and nature emergency and the circular economy agenda.

**Negative**

Building more homes will inevitably produce more carbon, however, the Council aims to build homes as energy efficiently and sustainable as possible. Since November 2020 all new build Council homes have been designed to achieve net zero carbon.

The Council's approach is designed to deliver most benefit to tenants, while mitigating capital cost uplift and maintenance implications as follows:

- Fabric first principles, to minimise energy demand and losses for example by setting minimum u-values and air-tightness levels to be achieved.
- Provision of low carbon/ renewable heating such as an air-source heat pumps.
- Level of on-site renewable electricity generation that can be achieved with photo-voltaic panels based on the available roof area / type and orientation etc.
- The balance of energy demand and emission is calculated to determine the level of offset required.
- Within the above approach the design guide requires designers to undertake an energy options appraisal to determine the best low carbon/renewable heating option for the specific development based on a number of parameters including cost for tenants to run and cost to install and maintain for the Council.

Priority is given to developing homes on brownfield sites and therefore reducing pressure on Edinburgh's greenbelt. All sites are within the Local Development Plan.

Based on modelling carried out by Napier University in 2019 (during the creation of the Council's Housing Suitability Strategy), it was estimated that the addition of

<p>10,000 new affordable homes (to silver standard), would increase overall CEC housing emissions by +9%, whilst increasing the number of overall homes by 50%. However, in reality this increase would be less as the Council is seeking to go beyond silver and work to deliver a net zero city by 2030 as in Council's Business Plan.</p>	
--	--

<b>Economic including socio-economic disadvantage</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <p>The Energy Advice Service, which was further expanded in February 2023, provides advice and information to Council tenants to operate heating systems efficiently, applying grants and loans, accessing suitable tariffs, and referring tenants to the Income Maximisation Service where appropriate, which helps to alleviate fuel poverty.</p> <p>Investment in Community Gardens will help to maintain and create quality spaces for local communities to use, in turn helping to improve health and wellbeing by encouraging tenants to get outdoors, get active, to develop new skills, and to grow their own fruit and vegetables.</p> <p>The Income Maximisation Services helps tenants to check their welfare benefits entitlements to maximise household incomes.</p> <p>The Tenants' Courier provides comprehensive information on how to get financial help and advice. Recent issues have covered topics on energy efficiency, dampness, mould and condensation, repairs, Changeworks opportunities.</p> <p>The Council has worked with key agencies to deliver a network of crisis support to tackle the impacts of the cost of living crisis. It also adopted a cash-first approach for people facing financial hardship, whilst also offering a range of holistic support and advice.</p> <p><b>Negative</b></p> <p>Any rent increase may have a disproportionate impact on tenants not receiving assistance with their rent. As part of the mitigation to any rent increase, officers are proposing the continuation of the Tenant Hardship Fund.</p>	<p>City-wide</p> <p>Tenants not in receipt of benefits to help with paying their rent</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?**

Any element of the capital programme and wider repair service, which arises from the budget strategy and requires procurement to be undertaken, will follow the Council's Sustainable Procurement Strategy, as well as the procurement framework and protocol, which already has built-in acknowledgement of equality and human rights, fair work, sustainability and environmental impacts.

**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 report and all tenant communication can be provided by ITS in different community languages, Braille and audio for citizens that require this assistance. The consultation material on the Consultation and Engagement Hub is compatible with the Read-Aloud functionality.

**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.**

Not directly.

A SEA has been completed as part of the Local Development Plan which directs the housing development sites for new build housing in the city.

Any new service/ project arising from the investment programme will have its impact assessment carried out individually.

**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.

N/A

**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:**

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>
Promotion of Tenant Hardship Fund to maximise spend of the allocated budget for 2023/24	George Norval, Housing Operations Manager, working with localities	By 31 March 2024	6 months / September 2024
Promote community garden fund in Tenants' Courier	George Norval, Housing Operations Manager	By 31 May 2024	6 months after publication of Tenants' Courier
Further consultation with tenants on charging higher rents for newly built/ newly modernised homes	Lisa Mallon, Housing Operations Manager	30 September 2024	31 December 2024

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

N/A

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

On-going performance monitoring through monthly monitoring meeting and quarterly reporting to the Council's Finance and Resources Committee.

**16. Sign off by Head of Service**

**Name** Derek McGowan, Service Director, Housing and Homelessness

**Date** 22/02/2024

**17. Publication**

Completed and signed IIAs should be sent to: [integratedimpactassessments@edinburgh.gov.uk](mailto:integratedimpactassessments@edinburgh.gov.uk) to be published on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)

**Edinburgh Integration Joint Board/Health and Social Care**

[sarah.bryson@edinburgh.gov.uk](mailto:sarah.bryson@edinburgh.gov.uk) to be published at [www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/](http://www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/)