

Integrated Impact Assessment – Summary Report (Interim)

1. Title of proposal

Non-Statutory Student Accommodation Consultation Draft January 2025

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

It should be noted that the general policy requirement and principles are already set out in the statutory local development plan - City Plan 2030. This guidance is providing further detail on how the policies should be implemented. It sets out the Council's expectations for student accommodation development. It provides guidance for developers and planning officers in the assessment of planning applications. There is a focus on ensuring accessibility to universities and colleges by active travel and public transport, open space, living well locally and integration with existing communities

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

Guidance interprets policies set out in the statutory local development plan – City Plan 2030. The preparation of City Plan 2030 was subject to extensive engagement over several years with a wide range of participants.

A public engagement exercise will be undertaken in line with the Council's Consultation Policy. The engagement period will last for 12 weeks commencing in early February 2025. This will focus on a series of in-person and online workshops with a range of stakeholders. This will include engagement with universities, colleges, Purpose Built Student Accommodation (PBSA) providers, planning consultants, students and the community at large. These will be supported by a questionnaire on the Council's Consultation and Engagement Hub.

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

Yes

5. Date of IIA

An IIA was carried out on 4 December 2024. A further workshop will be held following the public consultation to take into account engagement findings.

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
Lindsay Robertson	Senior Planning Officer (Report Writer and Facilitator)	6 December 2023
Lynne McMenemy	Development Planning Programme Manager (Lead Officer)	6 December 2023
Anna Grant	Team Manager	25 October 2022
Anika Taylor	Student Planner	30 October 2024
Jackie McInnes	Team Manager	6 December 2023
Chris Sillick	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 – where available use disaggregated data	Evidence base for City Plan 2030	<p>Over the last ten years, Edinburgh’s population has grown by more than 57,000 – an increase of 13%.</p> <p>Growth is projected to continue at an annual average of almost 3,500 per year in the period to 2032 taking the total population to 563,600. The growth is not projected to be uniform across all age groups. The greatest increase in population is projected for older people with the number of people aged over 65. School age children are projected to experience a moderate increase numerically with a growth of 1,500 primary age children and 3,700 secondary school age.</p> <p>By 2032, the average household size in Edinburgh is projected to fall to 2.0. The decreasing household size in the City means that household growth will even higher than the population growth. By 2032, the number of households is projected to increase by 18% - a growth of 41,000.</p> <p>There are disparities across the city with pockets of poverty, low income and multiple deprivation. Around 29,500 people in Edinburgh live in the most deprived 10% of areas in Scotland. This represents around 5% of Edinburgh total population. Public transport accessibility</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
		<p>varies across the city. Overall, 25% of Edinburgh’s population live in areas classed in the highest accessibility levels whilst 42% live in the lowest accessibility levels.</p> <p>In general, the population of Edinburgh enjoys a high standard of health. Life expectancy is high with females living 81.1 years and males living to 77.1 years. However, there are significant inequalities in general health and mortality rates between different neighbourhoods within the city.</p> <p>SESPlan Housing Need and Demand Study (HNDA) provides evidence of housing need within the Edinburgh Housing Market area.</p> <p>The needs of families, older people, households containing persons with a disability and gypsies and travellers have been considered in the HNDA.</p> <p>Evidence indicates building affordable and sustainable housing is a priority, with a variety of house types and sizes to promote and encourage mobility in the housing system.</p> <p>The social, economic and physical environmental conditions in Edinburgh are variable and therefore do not provide a consistent quality of environment adequate to ensure good standards of public health across all areas and communities.</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
	<p>The Higher Education Statistics Agency (HESA).</p>	<p>The latest data released shows that in 2022/23 there were 73,045 students enrolled in Edinburgh universities (University of Edinburgh, Edinburgh Napier University, Heriot-Watt University and Queen Margaret University), 63,640 were full-time students. 47,885 were undergraduates and 25,160 were postgraduates.</p> <p>A further 29,342 students were enrolled in Edinburgh College (Edinburgh by Numbers 2022).</p> <p>Student numbers in higher education in Edinburgh increased 29% over the period 2014/15-2021/22. In the academic year 2022/23, the number fell from 74,705 to 73,045.</p> <p>The number of first year undergraduate students peaked in 2021/22, numbers have fallen back to pre-2020.</p> <p>The overall number of international students increased between 2014/15 and 2021/22. In the year 2022/23 the number has fallen from 27,005 to 26,660.</p> <p>In 2022/23 17% of students enrolled in Scottish universities had a disability. 59% were female, 61% were below 24 years old, 11% were minority ethnic people.</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
Data on service uptake/access	N/A	
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation	Research on purpose-built student accommodation student housing in Scotland, Scottish Government, December 2022.	<p>Qualitative data collected suggests that many students believe that housing costs relative to their financial resources are a problem.</p> <p>Students from lower socioeconomic backgrounds expect to struggle financially during and after university.</p> <p>Unipol and NUS (2021) estimates that the average PBSA rent now accounts for over 70% of the maximum student loan, leaving such students with less than £70 per week to live on unless they have other sources of income. Identify a lack of affordable student accommodation.</p> <p>Likely that some students will experience homelessness during their studies. Students who can be at heightened risk for homelessness are those who are estranged from their families and care experienced students.</p> <p>Accessible rooms are often more abundant in the more expensive PBSA buildings, compounding financial problems that many disabled students already face.</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
Data on equality outcomes	City Plan 2030 Integrated Impact Assessment June 2024	<p>An Integrated Impact Assessment prepared for City Plan 2030 provides further evidence. No negative impacts were identified.</p> <p>See also data on populations in need.</p>
Research/literature evidence	Research on purpose-built student accommodation student housing in Scotland, Scottish Government, December 2022.	<p>The study has highlighted a range of student preferences and concerns in relation to the design and layout of accommodation, including proximity to neighbouring buildings, internal design and suitability for students with disabilities, access to natural light and outdoor space, and provision of common spaces</p> <p>Disabled students and those with long-term health conditions highlighted challenges in finding suitable PBSA, often due to issues of access or expectations over the level of shared amenities and space.</p> <p>Unipol argues that there is ‘not enough accommodation to meet the needs of disabled students’.</p> <p>Students with different household types, such as families, also reported difficulties in finding suitable accommodation.</p> <p>It is likely that there are others who are even less represented in the current evidence base but who find themselves disadvantaged in relation to accommodation. Such groups may include students with dependents and caring responsibilities, those with mental</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
		<p>health issues, LGBTQ+ students and those from ethnic minority groups.</p> <p>Living with strangers presented difficulties for some LGBTQ+ students in relation to ability to express self-identity.</p> <p>Some students highlighted that their cultural needs were not always met in their accommodation, for example the necessity of a shared bathroom.</p>
Public/patient/client experience information	City Plan 2030 Engagement	<p>The preparation of City Plan 2030 was subject to extensive engagement over a number of years with a wide range of participants.</p> <p>A review of this Interim IIA will be carried out following the engagement on the draft guidance to take account of findings. This will include engagement with students.</p>
Evidence of inclusive engagement of people who use the service and involvement findings	N/A	
Evidence of unmet need	Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing	In June 2023, the City of Edinburgh Council passed a motion titled ‘Student Homelessness Crisis’, in which it recognised the scale of housing insecurity and homelessness among students in

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
		<p>Edinburgh, as demonstrated in research undertaken by Slurp, Its analysis of 1,350 survey responses suggests that up to 16% of Edinburgh’s student population experienced homelessness at the start of semester 1 in 2023/24 as they struggled to find suitable accommodation (Slurp, 2023). NUS Scotland research found that 12% of students in Scotland experienced homelessness during their studies, which is higher than the rate of homelessness among the general Scottish population (NUS, 2024).</p>
Good practice guidelines	<p>Licensing of Houses in Multiple Occupation: Statutory Guidance for Local Authorities, 2012</p> <p>Building Standards Technical Handbook 4.2.9 April 2024</p> <p>Local living and 20 minute neighbourhoods: planning guidance, April 2024</p> <p>PAN 75 Planning for Transport, Scottish Government</p> <p>Secured by Design 2023</p>	
Carbon emissions generated/reduced data	<p>Air Quality Action Plan, February 2024</p> <p>Climate Strategy 2030</p>	<p>In 2020, the city’s baseline carbon emissions comprised: transport (31%), housing/domestic (29%), public and commercial buildings (23%), industry (17%).</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
		<p>The City Mobility Plan and City Plan 2030 support Edinburgh’s 2030 net zero target.</p> <p>Poor air quality, primarily caused by road transport emissions of gases such as nitrogen oxides (NOx) and particulate matter (PM2.5 and PM10) can have significant impacts on health. Some individuals may be more affected than others.</p> <p>The physical environmental conditions in Edinburgh are variable and therefore do not provide a consistent quality of environment adequate to ensure good standards of public health across all areas and communities.</p>
Environmental data	City Plan 2030: Environmental Report	City Plan 2030 is a qualifying plan in accordance with Section 5(3) of the Environmental Assessment (Scotland) Act 2005. A SEA has been prepared. This includes an assessment of policies including Hou 5, Env 31,33 and Econ 2 which are of particular relevance to this guidance. No significant environmental impacts were identified in the assessment of these policies.
Risk from cumulative impacts		The guidance has been prepared to align with City Plan 2030 which takes account of national and local strategies.
Other (please specify)		
Additional evidence required	Information gathered from future engagement.	Engagement on the draft guidance will follow.

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

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
<p>Positive</p> <p>Provision of accommodation to meet the needs of students.</p> <p>Guiding student accommodation to accessible locations may reduce travel costs which will be particularly beneficial to those on low incomes. It encourages active travel which will have health benefits.</p> <p>Guidance seeks routes that are suitable for all, including those with mobility issues. This will be particularly beneficial to those with mobility issues.</p> <p>It also requires that routes to universities and colleges are safe. Those groups particularly experiencing more fear and discomfort relating to violence and harassment in public spaces due to their protected characteristics should also particularly benefit from design advice seeking to make spaces safer and more secure.</p> <p>It is expected that the development of student accommodation incorporates design measures that promote personal safety and security and reduce the risk of crime and the fear of crime.</p>	<p>Students, including those with protected characteristics and those vulnerable to poverty.</p> <p>Students, including those with protected characteristics and those vulnerable to poverty</p> <p>Students, particularly those with mobility issues.</p> <p>All including women, disabled people, LGBTQ+, Refugees and asylum seekers, people with different religions and minority ethnic people.</p> <p>Students, including those with protected characteristics.</p> <p>All including students.</p>

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
<p>Local living, providing access to facilities needed for daily living within a short walking/wheeling distance of proposed student accommodation, will benefit all residents of the accommodation and improve health and well being by providing access to green space and health facilities.</p> <p>Suitable amenity to provide a healthy living environment is required. This should have positive benefits for all by ensuring that the design of student accommodation provides a good living environment for both those living in the accommodation and existing residents.</p> <p>Guidance promotes cluster flat living over studio accommodation. Cluster flats foster social interaction and are generally more affordable than studio accommodation. This will have positive impacts on health and wellbeing and affordability.</p> <p>Guidance requires good quality open space and promotes spaces designed for social interaction which are accessible to users of all abilities, including wheelchair users.</p> <p>Guidance on integrating PBSA with the neighbourhood should help foster good relations between students and other residents. Guidance encourages the provision of publicly accessible uses within developments to help ensure integration of student accommodation with the local community. This could benefit students and the wider community by providing services.</p> <p>Design should provide for the needs of people with a range of disabilities within bedrooms and within the accommodation overall. This should have positive benefits for both resident and visitors of all abilities.</p>	<p>All including students.</p> <p>Students including those vulnerable to poverty.</p> <p>All, including students.</p> <p>All.</p> <p>Disabled people.</p>

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
<p>The requirement for housing, including affordable housing will help to ensure different accommodation needs are balanced across an area, and that neighbourhoods are overall more able to meet a range of needs. This will have positive effects for all.</p>	<p>All, including those vulnerable to poverty</p>
<p>Negative</p> <p>The requirements of the guidance could make student accommodation more unviable which would result in less student accommodation being provided.</p> <p>Development may increase pressure on existing local facilities. However, the guidance advises that development should provide the necessary infrastructure as set out in City Plan policy. This should avoid any adverse impacts. Development could support new facilities in areas which are lacking.</p> <p>Introduction of student accommodation could have potential to undermine existing community. Guidance requires integration and an assessment of the impact on the areas character which should mitigate against negative effects.</p> <p>May be negative perceptions of impact of student's lifestyle on amenity. However, guidance requires that adequate amenity is provided to occupants and existing residents.</p> <p>Guidance promotes cluster flats which may not meet the needs of all students who may either as a lifestyle choice or for medical, cultural or other reasons prefer self-contained studio living. However, provision of a limited</p>	<p>All students especially those vulnerable to homelessness and those with certain accommodation requirements which is met through this sector.</p> <p>All</p> <p>All</p> <p>All</p> <p>All students including those with protected characteristics and those vulnerable to poverty</p>

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
number of studios allows for this choice. Guidance does not preclude any other format of accommodation.	

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive The <u>Edinburgh Design Guidance</u> will provide detailed guidance in relation to net carbon zero and climate adaption with regard to buildings. Whole life use of buildings promoted.</p> <p>The layout of buildings will seek to respond to the climate and harness solar energy/ gain, natural ventilation, encourage renewable energy and therefore reduce use of fossil fuels.</p> <p>The guidance requires that student accommodation is located to provide accessibility to universities and colleges by public transport and active travel. It also promotes local living. This avoids the need for journeys by car and should have a positive impact.</p> <p>Minimising emissions from vehicles will be particularly beneficial to young people and older people and those with respiratory conditions.</p> <p>Guidance requires buildings to be adaptable to future use which will maximise the building lifespan thereby avoiding new building. This will impact positively on sustainability and carbon generation.</p> <p>Open space is required which should have positive impacts on climate change adaptation.</p>	<p>All</p> <p>All, including older people, younger people.</p> <p>All, particularly young people and older people</p> <p>All</p> <p>All</p> <p>All</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>More emphasis on the use of Sustainable Urban Drainage (SUDs), green roofs and new tree canopy standards to adapt to changing climate.</p> <p>Encourage water management at plot scale and promoting approached with support mitigation of the impacts of climate change</p> <p>Increase in positive effect for biodiversity as part of development design and the related landscape.</p>	<p>All</p> <p>All</p> <p>All</p>
<p>Negative</p> <p>There are no expected significant negative environmental or sustainable impacts</p>	

Economic	Affected populations
<p>Positive</p> <p>Provision of student accommodation contributes in terms of direct construction jobs and training opportunities, supply chains and support for local businesses i.e. shops, cafes etc.</p> <p>The guidance encourages other commercial uses as part of developments which could provide opportunities for new businesses and employment opportunities. Role in community wealth building.</p>	<p>All including those vulnerable to poverty, along with other people with protected characteristics and the business community</p> <p>All and the business community.</p>

Economic	Affected populations
The running and management of student accommodation provides job opportunities.	All including students
<p>Negative</p> <p>The design requirements and cost of the developer contributions could make some student accommodation development within Edinburgh unviable – failure to capitalise on economic benefits of a strong construction industry and the associated benefits of new development and businesses.</p> <p>Could potentially result in a lack of population to support local services outwith term times.</p> <p>Requirements of the guidance could impact on viability of development and restrict development. This could impact on availability and affordability.</p> <p>Requirements could increase cost of student accommodation for students.</p>	<p>All including local business community</p> <p>Students</p> <p>Students</p> <p>Students</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?

Yes. It is possible that some or part of the actions in the plan would be undertaken by contractors. Equality, human rights and environmental and sustainability issues would be addressed though the general terms and conditions of the Council’s contract requirements.

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 range of communication methods, including social media will be used to reach out to different types of people ensuring a broad audience reach and opportunities for interaction.

Residents are encouraged to use our translation service if they have language/visual requirements. This will benefit non-English speakers including migrant workers, refugees and asylum seekers.

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.

A SEA screening report was undertaken and submitted to the SEPA Gateway for consideration. The report considered that an SEA was not required. The deadline for response from the Consultation Authorities is 23 December 2024. Should the response require an SEA this will be carried out.

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.

This IIA is interim. Engagement will be carried out on the draft guidance. Following this the IIA will be updated.

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
Engagement with groups and stakeholders – engagement to support finalisation of guidance.	Anna Grant, Team Manager	June 2025	June 2025

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

Yes. Requirements of the guidance could impact on viability of development and restrict development. This could impact on availability and affordability. Requirements could increase cost of student accommodation for students. Could potentially result in a lack of population to support local services outwith term times.

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

The IIA will be subject to review following the engagement exercise.

16. Sign off by Head of Service

Name: David Givan

Date: 17 January 2025

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/