# 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

Strategic Housing Investment Plan (SHIP) 2025/26 – 2029/30

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

SHIPs are submitted to the Scottish Government annually and identify the projects which will be included in the Affordable Housing Supply Programme annual Strategic Local Programme Agreements. This is a requirement for all local authorities and the SHIP is subject to approval at Housing, Homelessness and Fair Work Committee.

The SHIP identifies a potential development programme of around 9,000 new affordable homes over a five-year period, with around 8,000 of these requiring grant funding through the Affordable Housing Supply Programme (AHSP). The SHIP would be funded through a mix of grant funding, RSLs’ private borrowing, finance raised by private developers, institutional investment, developer contributions and Housing Revenue Account (HRA) funding.

These would require an additional £416m of grant funding over five years, assuming grant funding remains at current levels, c£34m per year.

**Updates – change in numbers from last year’s ship to this year’s ship.**

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

The 2025/26 Budget Consultation is currently underway and current results show the delivery of more, new social rented homes alongside investment in existing stock are the two highest priorities for Council tenants.

All projects within the SHIP are subject to consultation with the local community through the Planning process. The delivery of more affordable homes in Edinburgh will have a positive impact on communities.

The consultation with the community on proposed new housing developments is published and the feedback is taken into account when Development Management Sub Committee determine whether to approve or refuse a planning application.

All developing RSLs have been involved in producing the SHIP and will be prominent in delivering the housing projects contained within.

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

Yes.

The Fairer Scotland Duty came into force in April 2018 (Equality Act 2010, Part 1). This duty places a responsibility on the public sector to reduce inequalities of outcome, caused by socio-economic disadvantage, when making strategic decisions and to have due regard to the need to eliminate discrimination, harassment, victimisation and advance equality of opportunity for people with protected characteristics (as defined in the Act) i.e. Age, Disability, Sex, Pregnancy and Maternity, Gender reassignment, Sexual orientation, Race, Religion and Belief, and Marriage and Civil Partnership.

## 5. Date of IIA

**29 November 2024**

## 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 |
| Jamie Ramsay | Senior Housing Development Officer  (Project Lead) |  |
| Ada Yiu | Senior Housing Development Officer | 22 May 2019 |
| Mhairi Chapman | Housing Development Officer (Report Writer) |  |
| Christopher Glover | Housing Development Officer |  |
| Alex Blyth | Senior Housing Development Officer (Facilitator) |  |

## 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 | Housing Need and Demand Assessment (HNDA3)  Rapid Rehousing Transition Plan (RRTP) Update Reports  Number of households currently registered with EdIndex and average number of bids per property  End Poverty in Edinburgh Annual Progress Report – 2024 | Edinburgh is a growing city and one of the most highly pressured housing markets in the country.  The latest Housing Need and Demand Assessment (HNDA3), 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.  Edinburgh has the highest number of homeless households in Scotland, with over 7,600 open homeless cases in November 2024, the highest of any local authority in Scotland.  The number of households in temporary accommodation in Edinburgh has increased by 50% from 3,570 in March 2020 to 5,316 households in November 2024.  Around 290 households (on average) bid for homes advertised through Choice and approximately 24,500 households are currently registered with EdIndex.  Homelessness and access to affordable housing continues to be the biggest and most visible driver of poverty in Edinburgh in 2024, as illustrated by the Council’s declaration of a Housing Emergency in 2023.  The Edinburgh Poverty Commissions Final Report (2020) noted that “There is no pathway to ending poverty in Edinburgh without resolving the city’s housing crisis.”, re-affirming the key role that access to good quality social housing plays in tackling inequality, poverty and social exclusion. |
| Data on service uptake/access | Y | As outlined above, there is a high demand for permanent, affordable homes for those households in need. |
| Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation | Scottish Index of Multiple Deprivation (SIMD) | 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  The SIMD data shows that many of the Council’s homes are situated in the most deprived areas in the City / Scotland. About 70-80% of the Council’s tenants get help through Housing Benefits or Universal Credit housing element to pay for their rents. |
| Data on equality outcomes | City Plan 2030 IIA  Accessible Housing Study (2022)  Edinburgh Council’s Rapid Rehousing Transition Plan (RRTP) | The social, economic and physical environmental conditions in Edinburgh are variable. In general, the population of Edinburgh enjoys a high standard of health. Average 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. (City Plan 2030 IIA). The majority of affordable housing provision in Edinburgh is areas with low SIMD scores and supports regeneration in those areas.  As part of the Accessible Housing Study (2022), 92% of survey respondents were very or fairly satisfied with their home and how it meets their needs. In the same study, 42% of households who noted they have a health condition or disability stated that their current home does not meet the needs of their household. Furthermore, 53% of households with a health condition or disability are having trouble managing stairs at home.  Edinburgh’s Rapid Rehousing Transition Plan (RRTP) annual update was agreed at H,H&FW Committee on 8 August 2023. This highlighted trends in homelessness assessments that were similar to pre-Covid levels, with an increase of 30% in the number of households at risk of homelessness. The report also highlighted almost 6000 cases where the Council has a duty to secure settled housing. |
| Research/literature evidence | 1. Edinburgh Council’s Housing Emergency Action Plan (HEAP) 2. Scottish Index of Multiple Deprivation (SIMD) 3. Edinburgh Council City Plan 2030 4. South East Scotland Housing Need and Demand Assessment 3 (HNDA) 5. HARSAG recommendations, Scottish Government Ending Homelessness Together Action Plan (Nov 2018) and CEC’s Rapid Rehousing Transition Plan (RRTP). 6. Climate Strategy 2030 | 1. This report highlights the unprecedented economic situation and challenges facing Edinburgh’s citizens, particularly the poorest, with regards to finding appropriate and affordable housing. The report proposes actions to mitigate current difficulties where possible. 2. Shows clearly where people with the highest multiple deprivation factors are living. This is taken into account when new housing developments or improvement of existing affordable homes is planned. 3. Extensive data on Edinburgh’s population now and into the future and the location of proposed areas of land where housing development is supported. 4. The purpose of the HNDA is to estimate the future number of additional housing units to meet existing and future housing need and demand based on a range of scenarios. The latest HNDA (HNDA 3) states that there is demand for between 36,000 and 52,000 new homes in Edinburgh between 2021 to 2040 with between 24,000 to 35,000 of these homes needing to be affordable. 5. HARSAG recommendations, Scottish Government Ending Homelessness Together Action Plan (Nov 2018) and CEC’s Rapid Rehousing Transition Plan (RRTP). 6. Reviews the climate situation and calls for reduction in climate damaging emissions along with planning for the impacts of climate change and mitigating against its impacts. Consideration of mitigation of flood risk is considered in the planning process. Further notes on climate considerations are made in the Environmental and Sustainability impacts section further on in this IIA. |
| Public/patient/client experience information | Data available on Planning Portal detailing consultation responses for individual planning applications that include affordable housing provision.  2025/26 Budget Consultation Survey | The consultation with the community on proposed new housing developments is published and the feedback is taken into account when Development Management Sub Committee determine whether to approve or refuse a planning application.  The delivery of more affordable homes has been a consistent priority issue for tenants. The 2025/26 Budget Consultation is currently underway and current results show the delivery of more, new social rented homes alongside investment in existing stock are the two highest priorities for Council tenants. |
| Evidence of inclusive engagement of people who use the service and involvement findings | 2025/26 Budget Consultation Survey  RSL Delivery Partner Engagement on SHIP Sites  Engagement undertaken as part of Local Housing Strategy (LHS) | The delivery of more affordable homes has been a consistent priority issue for tenants. The 2025/26 Budget Consultation is currently underway and current results show the delivery of more, new social rented homes alongside investment in existing stock are the two highest priorities for Council tenants  All developing RSLs have been involved in producing the SHIP and will be prominent in delivering the housing projects contained within. Regular programme meetings are undertaken with delivery partners to monitor specific project progress and a quarterly meeting with Development Directors takes place to share best practice and ideas.  A number of engagement events, along with an early engagement survey, have been undertaken to help inform the development of Edinburgh’s Local Housing Strategy (LHS). Whilst individual events were focused on a variety of topics, the issue of affordable housing supply and funding mechanisms was a prevailing subject raised by stakeholders across the sessions. |
| Evidence of unmet need | Edinburgh Council’s Rapid Rehousing Transition Plan (RRTP)  Housing Emergency Action Plan (HEAP) | There is a high demand for social rented housing with an average of 290 households bidding for every social rented home that becomes available for let. Edinburgh has one of the lowest proportions of social housing in Scotland with only 15% of homes for social rent compared to the national average of 23%. The Council has a target to rehouse homeless households in around 70% of all available social lets and around 50% of lets from RSL partners. Work is underway with partners to seek to increase this percentage in the coming months. In 2023/24, 68% of Council and 52% of RSL homes were let to homeless households, including 22 Edinburgh Living properties. Edinburgh Living has committed to continue to target working homeless households for mid-market rent and to date have helped 164 working homeless households secure a home.  As part of the Housing Emergency Action Plan the target percentage of lets to homeless households has increased from 71% to 76% (Council social rented homes) and 55% to 65% (RSL social rented homes). |
| Good practice guidelines | Scottish Government Strategic Housing Investment Plan guidance note MHDGN 2024/01 | Guidance for all Local Authorities in Scotland on preparing SHIP reports.  The SHIP is updated annually and submitted to the Scottish Government once approved by Housing, Homelessness & Fair Work Committee. |
| Carbon emissions generated/reduced data | 2019 Carbon Modelling Study | In 2019 Edinburgh Council commissioned Napier university to do carbon modelling in relation to existing and new homes. It was estimated that the addition of 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 achieve net zero carbon. |
| Environmental data | Y | As above |
| Risk from cumulative impacts |  | n/a |
| Other (please specify) |  | n/a |
| Additional evidence required |  | n/a |

## 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** |
| --- | --- |
| Positive  On [5 October 2021](https://democracy.edinburgh.gov.uk/documents/s37970/Item%207.9%20-%20End%20Poverty%20in%20Edinburgh%20Annual%20Report.pdf), the Council’s Policy and Sustainability Committee considered the first annual progress report against the Council's End Poverty in Edinburgh Delivery Plan, developed in response to the Edinburgh Poverty Commission’s calls to action. The latest annual update report was considered by Policy and Sustainability Committee on [22 October 2024](https://democracy.edinburgh.gov.uk/ieListDocuments.aspx?CId=135&MId=7344&Ver=4).  The latest available data show that an estimated 17% of people in Edinburgh were living in poverty in the period to spring 2023, accounting for over 87,000 individuals. This included over 17,200 children, or 20% of all children in the city. 10% of all residents (including 14% of all children) had been living in poverty for three of the past four years  Households in key priority groups show a heightened risk of poverty and destitution. Two thirds of all people in destitution have a long term chronic health condition or disability, while around 40% of all lone parent or minority ethnic households are in poverty  The delivery of high quality, affordable homes is essential in helping to end poverty and tackle homelessness.  Edinburgh has the highest average private sector rent in Scotland, with a 2-bedroom property costing around £1,500, which is £400 higher than the national average. In November 2023, the Council declared a housing emergency, with more than 5,000 homeless households in the city. Edinburgh has an estimated 60,000 private rented properties and around 43,000 landlords. This makers the provision of new affordable homes essential to help address the Housing Crisis in Edinburgh.  The average household income figure for Edinburgh has been updated from £45,443 per annum to £58,331 per annum.  [ESPC](https://espc.com/news/post/house-price-report) reported the average house price in Edinburgh in September 2024 to be £290,259, which is roughly five times average household income.  Both [Scottish Government](https://www.gov.scot/publications/rent-affordability-affordable-housing-sector-literature-review/pages/4/) and [Shelter Scotland](https://blog.shelter.org.uk/what-is-affordable-housing/) research states that paying more than 30% to 40% of household income on housing is considered unaffordable, although affordability does vary depending on personal circumstances. [Citylets](https://www.citylets.co.uk/research/reports/pdf/Citylets-Quarterly-Report-Q2-2024.pdf) reported that, in the second quarter of 2024, the average rent across all property sizes in Edinburgh is £1,574 per calendar month. However, rents for family housing are even higher; the average rent for a three bedroom home is £2,058 per month  By providing homes that are built to strict energy efficiency standards and building standards, this will help to provide secure, well insulated properties that reduce heating and energy costs for tenants. Increased access to affordable housing and well-designed, safer and cleaner communities will contribute to improved health and provide homes which are physically accessible.  The majority of new build properties delivered by the Council and its housing association partners are accessible for people of limited mobility, meaning particular needs and housing requirements can often be met through allocation of a standard general needs property (Housing for Varying Needs standards are currently being reviewed with work being led by the Scottish Government).  The proposed introduction of a new Scottish Accessible Homes Standard could help to streamline accessibility standards across tenures, although it would not necessarily lead to an increase in the provision of wheelchair homes in the private sector. The Council House Building team responded to the Scottish Government’s consultation in December 2023 as part of a wider response on proposed updates to Housing for Varying Needs guidance. The responses are being reviewed by the Scottish Government.  The commissioned Accessible Housing Study (2022) findings were used to inform an indicative, cross tenure wheelchair accessible homes target of 7% annually for all completions. The current, long-standing, target of 10% for affordable housing has been retained as this is well understood by partners and reflects the fact that the affordable sector currently delivers more wheelchair housing than the private sector.  The SHIP 2025-30 pipeline includes 5% fully wheelchair accessible homes (5% of the grant funded programme) that could be approved over the next five years. These figures are below the long-standing target of 10% provision for affordable housing however there are reasons for this. Many of the projects proposed in the SHIP are in varying stages of the planning process and as such, the housing mix, form type and design features are yet to be determined. Further to this, two delivery partners pausing their development programmes has further impacted the numbers. One of these in particular were a specialist provider focussing on the provision of wheelchair units.  In addition to building new homes to meet changing and varying needs, the SHIP includes grant funding for RSLs to carry out adaptations to homes. This enables people to remain in their own homes and live independently. Adaptations continue to be a strategic housing investment priority. Each year a budget in the region of £900,000 supports over 400 adaptations within RSL homes. This budget has been retained at previous levels despite the 24% cut to the AHSP budget, demonstrating an ongoing commitment to supporting works crucial to tenants and their families. Adaptations to Council homes are funded from the Housing Revenue Account. | Homeseekers with general needs, varying and complex needs and different economic status.  People with protected characteristics |
| **Negative** |  |

| **Environment and Sustainability including climate change emissions and impacts** | **Affected populations** |
| --- | --- |
| **Positive**  The affordable house-building programme seeks to maximise delivery of homes on brownfield sites, reducing pressure on Edinburgh’s green belt. Building more homes will inevitably produce more carbon, however, all new developments are required to meet minimum Building Regulations, which contain stringent targets for meeting certain energy efficiency standards. Since November 2020, all new build Council homes have been designed to achieve net zero operational emissions. These energy efficiency standards are crucial in moving Edinburgh towards a net zero city by 2030, along with reducing heating and energy costs for tenants. This plays a key role in meeting statutory EESH2 targets by 2032 by reducing poor energy efficiency as a driver for fuel poverty.  Council and RSL house building partners are working to sustainability principles which promote local material sourcing, recycling, insulation standards, and renewable energy. The environmental impact of individual projects is currently assessed through the planning process.  The Scottish Government has made a commitment that all new homes which are granted consent from 2024 must use heating systems that produce zero direct emissions at the point of use. This means that new homes will not be able to use fossil fuels such as gas or oil and could involve the installation of low or zero-emissions systems for individual homes or connection to a local heat network.  The Council’s declaration of Climate and Nature Emergencies has placed sustainability, climate change and nature recovery at the centre of strategic and policy discussions.  The recent adoption of the City Plan 2030 with the National Planning Framework 4 provides a policy framework that ensures buildings, and the surrounding landscapes are designed to support these emergencies. The future designs will help mitigate the impact of carbon through sequestration and the landscape design will checked through the planning process to ensure consideration of climate adaptation challenges e.g surface water flooding, increasing intensity and volume of water, drought tolerant species etc. The buildings will also be designed to take account of heat and drainage challenges that the changing climate is creating.  Protecting, restoring and encouraging nature will also be considered in the design of the buildings (for example swift bricks) and the surrounding landscape. The planning process also considers the selection and structure of the proposed landscape design to maximise the future habitat provision, whilst creating a safe, attractive place for future residents to enjoy.  Energy efficiency standards are already in place for new affordable housing in Scotland. All new developments are required to meet minimum Building Regulations, which contain stringent targets for meeting certain energy efficiency standards. The Council’s own house building programme is leading by example in terms of sustainable development. A design brief has been produced that will ensure all new build homes are designed to achieve net zero carbon operational emissions. The net zero carbon design brief has been in place since November 2020 and follows a fabric first approach, allowing the design and construction to be tailored to meet the requirements of the site and to select the most appropriate low carbon heating solution. | **City Wide** |
| **Negative**  The SHIP 2025-30 outlines some potential development on greenfield sites despite priority being for brownfield development.  Domestic sector emissions account for 30% of Edinburgh's overall emissions (2022). Council housing represents 8.6% of homes but only 5.3% of domestic sector emissions or 1.9% of Edinburgh’s overall emissions (as of 2021).  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 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 achieve net zero carbon. | **City Wide** |

| **Economic** | **Affected populations** |
| --- | --- |
| **Positive**  The aspiration to deliver 25,000 affordable homes by 2027 would generate additional investment in the local and national economy.  The Council has a policy for sustainable procurement, this is a process whereby organisations meet their needs for goods, services and works in a way that accomplishes good value for money on a whole life basis and provides benefits not only for the organisation but also for the society, economy and the environment  The terms of AHSP grant offers require grant applicants to adhere to the Fair Work First guidelines as set out by the Scottish Government. These include appropriate channels for effective voice, such as trade union recognition, investment in workforce development and offer flexible and family friendly working practices for all workers from day one of their employment. There should be no inappropriate use of zero hours contracts, action should be taken to tackle the gender pay gap and create a more diverse and inclusive workplace, payment of the real Living Wage and opposing the use of fire and rehire practice. Supporting evidence of Fair Work First adherence must be provided by grant applicants before an offer of grant can be considered. | **City Wide** |
| **Negative** |  |

## 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?

Terms of grant offers to developers for affordable housing include providing community benefits. If any element requires procurement to be undertaken for the programme, an acknowledgement of equality and human rights, sustainability and environmental impacts is already built into the Council’s procurement framework and protocol.

Terms of grant offers also require grant applicants to adhere to the Fair Work First guidelines as set out by the Scottish Government. These include appropriate channels for effective voice, such as trade union recognition, investment in workforce development and offer flexible and family friendly working practices for all workers from day one of their employment. There should be no inappropriate use of zero hours contracts, action should be taken to tackle the gender pay gap and create a more diverse and inclusive workplace, payment of the real Living Wage and opposing the use of fire and rehire practice.

## 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 will be published on the Council’s website for the public and stakeholders to view subject to approval.

The Council is a member of ‘Happy to Translate’ supporting engagement with

customers who have little or no written English. All communication is provided in the format requested.

The consultation with the community on proposed new housing developments is published and the feedback is taken into account when Development Management Sub Committee determine whether to approve or refuse a planning application.

## 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](https://www.gov.scot/policies/environmental-assessment/strategic-environmental-assessment-sea/) (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 Strategic Environmental Assessment ([SEA](http://www.edinburgh.gov.uk/downloads/file/9684/sea_post_adoption_statement_july_2017)) has been completed as part of City Plan 2030 which presents the housing development sites in the city.

## 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.

## 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** |
| --- | --- | --- | --- |
| To continue discussions with the Convention of Scottish Local Authorities (COSLA) and Scottish Government seeking a review of the TMDF allocation, seeking to increase Edinburgh’s allocation of funding to support affordable housing delivery. | Housing Strategy & Development team | Ongoing | Ongoing |
| To maintain a regular dialogue with Scottish Government to continue to seek additional funding to support the pipeline of development projects within the SHIP | Housing Strategy & Development team | Ongoing | Ongoing |
|  |  |  |  |

## 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?

The SHIP is reviewed annually and the AHSP is monitored continuously through discussions with delivery partners, planning colleagues and the Scottish Government.

## 16. Sign off by Head of Service

**Name: Derek McGowan**

**Date: 11 March 2025**

## 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)

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