

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

1. Title of proposal

Edinburgh's Local Housing Strategy (LHS) 2025-2030

2. What will change as a result of this proposal

The Housing Scotland Act 2001, requires that all Local Authorities prepare and submit a Local Housing Strategy to the Scottish Government every five years. The Local Housing Strategy is the key strategic document for housing and covers all tenures. Housing is relevant to all Edinburgh's citizens as well as a wide range of organisations working across the sector. An IIA is necessary as individual groups may be potentially adversely or positively affected by aspects of the strategy.

As a result of this proposal an updated Local Housing Strategy for Edinburgh (LHS) will be developed and published. The strategy includes the following chapters:

1. Deliver homes to provide choice & affordability for all
2. Support private renters, home-owners and landlords
3. Ensure homes are modern, warm and sustainable
4. Prevent and respond to homelessness
5. Provide suitable homes with the right support to meet people's needs
6. Develop vibrant, connected, safe and inclusive communities

The strategy will bring together existing strategies and policies with new actions also identified and taken forward through the development of the LHS. Progress will be monitored and reported on annually. Outcomes over the period of the LHS are anticipated to include;

- Increased affordable housing supply in Edinburgh
- A Private rented sector that increasingly provides good quality, affordable housing options to meet people's needs
- Communities that are vibrant and safe, with access to the services needed
- Homelessness is addressed through early intervention, prevention and housing options
- Specialist housing provision is increased to help meet need
- The impact of Climate change in Edinburgh is mitigated in line with the City of Edinburgh's Climate Change Strategy
- New build council housing will continue to move towards net zero
- The number of households in fuel poverty will be minimised; and
- House condition and quality will be improved in the social rented sector

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

The LHS has been developed in consultation with a wide range of stakeholders including departments across the City of Edinburgh Council, Registered Social Landlord (RSL) partners, third sector organisations, community groups, private sector representative organisations such as the Scottish Association of Landlords and Homes for Scotland and members of the public

including Council tenants. In total, over 1,100 people were engaged with and written responses were submitted from 34 organisations.

Public engagement took place in three phases, from May 2024 to April 2025. In Phase 1 a public survey was promoted in May/June 2024 to ascertain peoples housing priorities for Edinburgh. Phase 2 took place from July to October 2024 and involved participation in forums and partnership meetings along with community outreach sessions and targeted engagement for specific groups. Phase 3 included public consultation of the draft Local Housing Strategy for 8 weeks between February and April 2025. Reviews of the phase 2 engagement identified some gaps which were addressed through further engagement in phase 3 with minority ethnic groups and people with no recourse to public funds. Private sector organisations were encouraged to complete the online consultation, to comment on the draft LHS, with responses provided by a number of organisations including the Scottish Association of Landlords.

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

15th May 2025

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)

Interim IIA meeting attendees at 4 December 2024 meeting;

Name	Job Title	Date of IIA training
Jill Thompson	Housing and Homelessness Strategy Manager	Training completed
Sarah Burns	Head of Housing Operations	
Cath O'Shea (Facilitator)	Senior Housing Development Officer	
Robyn Barrie (Lead officer)	Senior Housing Development Officer	
Chris Glover (Report writer)	Housing Development Officer	

Apologies

Lindsay Robertson	Senior Planning Officer	
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IIA Final version was approved by email by those above by 15th May 2025

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	<p>South East Scotland Housing Need and Demand Assessment 3 (SESplan HNDA3)</p> <p>Number of households currently assessed as homeless; Council Homelessness data and Scottish Government Homelessness Statistics 2023/24.</p> <p>Number of households currently registered with EdIndex and average number of bids per property.</p> <p>EdIndex applicants by priority category, from Appendix 4 of the EdIndex during the Housing Emergency report to Housing, Homelessness and Fair Work Committee, 27 Aug 2024.</p>	<p>Edinburgh is a growing city with one of the most highly pressured housing markets in the country. The latest HNDA3 which received robust and credible status in July 2022, shows the need for between 36,000 to 52,000 new homes to be built in Edinburgh between 2021-2040. It is estimated that, over half, between 24,000 to 35,000 of those homes should be affordable.</p> <p>Households presenting as homeless, numbers in temporary accommodation and case lengths, all are rising.</p> <p>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.</p> <p>Around 290 households (on average) bid for homes advertised through Choice and over 24,500 households are currently registered with EdIndex (Nov 2024).</p> <p>Table 2: Applicants by Priority Category 31/03/24</p> <table> <tr> <th>Choice Priority Category</th><th>Number</th><th>%</th></tr> <tr> <td>Gold</td><td>497</td><td>1.97%</td></tr> <tr> <td>Silver - Homeless</td><td>6,545</td><td>25.95%</td></tr> <tr> <td>Demo & Officer Panel</td><td>242</td><td>0.96%</td></tr> <tr> <td>Overcrowding</td><td>1,038</td><td>4.11%</td></tr> <tr> <td>Underoccupation</td><td>155</td><td>0.61%</td></tr> <tr> <td>Waiting Time</td><td>16,749</td><td>66.40%</td></tr> <tr> <td>Total</td><td>25,226</td><td>100%</td></tr> </table>	Choice Priority Category	Number	%	Gold	497	1.97%	Silver - Homeless	6,545	25.95%	Demo & Officer Panel	242	0.96%	Overcrowding	1,038	4.11%	Underoccupation	155	0.61%	Waiting Time	16,749	66.40%	Total	25,226	100%
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Data on service uptake/access	<p>See above row</p> <p>Council Homelessness data</p> <p>End Poverty in Edinburgh Annual Progress Report – 2024</p>	<p>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.</p> <p>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.</p>
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	<p>Yes</p> <p>Scottish Index of Multiple Deprivation (SIMD)</p> <p>Council Homelessness data</p> <p>Scottish House Condition Survey (SHCS)</p>	<p>In many ways, Edinburgh is a flourishing, prosperous city. However, as with most major cities, wealth is not distributed equally. 17% of Edinburgh’s residents – and 20% of all children – are living in poverty across the city. The majority of people living in poverty in Edinburgh are of working age, in employment, living in rented accommodation. Around 29,500 people in Edinburgh live in the most deprived 10% of areas in Scotland. This represents around 5% of Edinburgh total population</p> <p>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.</p> <p>Homeless households tend to have low incomes with only around 15% being in full time employment (RRTP IIA)</p> <p>The SHCS data shows that social housing sector has the highest level of fuel poverty.</p>
Data on equality outcomes	Edinburgh Council City Plan 2030 IIA.	<p>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 in areas with low SIMD scores and supports regeneration in those areas.</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>Evidence and data sources are shown in the LHS</p> <p>The Council's Accessible Housing Study (2022)</p> <p>The SHIP 2025-30</p> <p>Rapid Rehousing Transition Plan (RRTP)</p> <p>The Council's Accessible Housing Study (2022)</p>	<p>People with Protected Characteristics The Equality Act 2010 brings together legislation covering race, disability, and gender to remove inconsistencies and harmonise the law into a single approach. There are nine protected characteristics defined in the 2010 Act. We have added gender reassignment to the list of nine protected characteristics below.</p> <p>The provision of quality affordable housing should have a positive impact on people with protected characteristics;</p> <ul style="list-style-type: none"> • Age Older people The LHS should have a positive impact on older people who are noted in the specialist housing section of the LHS and through IJB strategic planning. A third of the respondents to the Council's Accessible housing study (2022), with a health condition or disability, noted that they currently need adaptations to make their home more suitable for them. Actions in the LHS are linked to supporting people to stay in their own home as long as possible through adaptations and with the care support that they need. 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. Adaptations to Council homes are funded from the Housing Revenue Account Accessible housing provision is key to providing more choices for older people with limited mobility or who are wheelchair users. Accessible housing is also covered in the specialist housing section of the LHS Younger people are increasingly unable to enter the housing market and their routes to independent living are more difficult than 10 years ago due to increasing house prices and increasing rental and living costs. The percentage of 16-25 year olds in Edinburgh is 17% (Census 2022). Much of the work noted in the PRS section of the LHS will improve PRS housing conditions for anyone who is renting privately. The RRTP, which will now be mainstreamed into the LHS, includes ongoing commitments to support younger people at risk of, or experiencing, youth homelessness, including commissioned services, ongoing work to support care experienced young people and exploration into youth housing hub models.

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 data-bbox="483 715 931 778">The Strategic Housing Investment Plan (SHIP) 2025-30</p> <p data-bbox="483 919 931 983">Edinburgh LHS Consultation and Engagement Report 2025</p> <p data-bbox="483 1123 931 1187">City of Edinburgh Council Homelessness data</p>	<ul style="list-style-type: none"> <li data-bbox="954 212 2096 667"> <p>Disability</p> <p>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.</p> <p>Providing accessible affordable housing for people with disabilities is referred to in the specialist housing section of the LHS. In addition the SHIP notes actions being taken by the Council and RSLs to support provision for people who are disabled. Sites have been completed recently through the AHSP with good levels of wheelchair access and for people with learning disabilities to live in core and cluster arrangements where support is available nearby.</p> <p>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. It is assumed this is due to current economic challenges in delivering larger accessible affordable homes with no additional grant funding available through the AHSP to cover the additional build costs.</p> <li data-bbox="954 922 2096 1225"> <p>Marriage or Civil Partnership</p> <p>People who are married or in civil partnerships have strong housing rights, will be treated equally and will not be impacted adversely by the implementation of the LHS.</p> <p>Single adults can face difficulties in affording rent and deposits or mortgage payments, in comparison to couples. This was mentioned in various LHS targeted engagement sessions. The further challenges for single parents in meeting housing costs were also highlighted. Implementation of the LHS will not lead to specific negative effects for people who are single.</p> <li data-bbox="954 1228 2096 1393"> <p>Pregnancy and maternity</p> <p>The provision of a range of house types to meet housing need is a key theme of the LHS and this is relevant to the provision of family housing. The need for larger housing with 3+ bedrooms, is taken into account on all sites when planning new affordable housing.</p>

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	Edinburgh LHS Consultation and Engagement Report 2025	<p>The number of children living in temporary accommodation in the capital is 148% higher than five years ago (March 2024). On 31 March 2024 there were 3,127 children living in temporary accommodation in Edinburgh, compared to 1,260 on 31st March 2019. Households with children also spend longer in the homelessness system than those without, with single parent households spending on average 600 days in temporary accommodation.</p> <p>The council shares information with education services whenever a child moves into temporary accommodation to encourage further support to be provided.</p> <p>478 pregnant women made homeless applications in Edinburgh between April 2021 and March 2024.</p> <ul style="list-style-type: none"> • Race The Council and its partners, in relation to new house building and house acquisitions, continue to attempt to take account of issues relating to minority ethnic people. These include particular demand issues, such as household size and age distribution as well as accessibility and support where language and communication may be an issue. The council and RSL partners are committed to providing housing and support for asylum seekers and refugees. The LHS Consultation and Engagement report covers key areas of concern raised by various groups including; from minority ethnic people and from refugees from Afghanistan, Syria and Ukraine. Participants of targeted engagement sessions, for example, highlighted that minority ethnic people in Scotland are generally in lower paid jobs and this means many face greater financial challenges. In addition, it was highlighted that in many cases, the Covid pandemic had a greater impact on minority ethnic peoples health. • Religion or belief There are no specific religion or belief, equality issues that apply to the Local Housing Strategy • Sex Edinburgh's Local Housing Strategy includes reference to women's safety issues in relation to tackling anti-social behaviour in Chapter 4 on Neighbourhoods. The development of the Community Safety and Antisocial Behaviour Strategy for 2024-2025 is captured as an action within the LHS. The LHS Homelessness Chapter 2 also reviews different strands of support for women experiencing domestic abuse and refers to the Council's Domestic Abuse Policy. • Sexual Orientation (LGBT+)

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		<p>Multi-agency support is needed to ensure the inclusion, well-being, and safety of the LGBT+ community across the city. The Equality Network's Response to the Human Rights Bill for Scotland Consultation, highlighted that housing conditions are one of the issues experienced as an LGBT+ person. An estimated 24% of homeless young people identify as LGBT+ and 77% of these young people identify coming out to their parents as the main factor in becoming homeless. The LGBT+ Health and Wellbeing Fit for Purpose report highlights the specific needs of the older members of the LGBT+ community too, in regards to housing and social care.</p> <ul style="list-style-type: none"> • Gender reassignment – trans/ transgender identity Discrimination may also be faced by people who are transgender or are going through gender reassignment. This might include difficulties in securing a PRS home due to discrimination. Multi-agency support is also required to support this group. Access to affordable housing is provided through the Council's allocation policy which follows equalities legislation and best practice. • Other vulnerable groups; The following vulnerable groups will benefit from implementation of the LHS in providing more affordable homes and sustained support for people who may become or are homeless; Unemployed • Single parents and vulnerable families • People on benefits • Those involved in the criminal justice system • People in the most deprived communities (lowest 20% SIMD areas) • pensioners • Looked After Children • Carers including young carers • People misusing substances • Others e.g. Veterans • Students • Single adult households • People who have experienced the asylum system • Those leaving the care setting including children and young people • those with illness • Homeless people • People with low literacy/numeracy • People with lower educational qualifications • People in low paid work • People with one or more Protected Characteristics
Research/literature evidence	<ol style="list-style-type: none"> 1. Edinburgh Council's Housing Emergency Action Plan (HEAP) 2. Scottish Index of Multiple Deprivation (SIMD) 	<ol style="list-style-type: none"> 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 aimed at addressing the current crisis. 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.

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	<ul style="list-style-type: none"> 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. The joint Scottish Government and CoSLA Prevention Duty consultation paper 7. The Youth homelessness Prevention Pathway published by A Way Home Scotland 8. The Scottish Government consultation on "A New Deal for Tenants" draft rental strategy. 9. Climate Strategy 2030 	<ul style="list-style-type: none"> 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. All these reports evidence the need to change the mix of temporary accommodation, reduce the number of households in temporary accommodation and prevent homelessness wherever possible. 6. identified the ways in which prevention of homelessness as a legal duty may be achieved and defines homelessness prevention as a shared responsibility across public bodies. 7. lays out a pathway to ending youth homelessness and identifies issues that more commonly arise for young people. 8. Considers potential establishment of a new housing standard, in support of good outcomes for tenants. 9. 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. <p>Over 100 data sources e.g. reports/ literature is referred to and referenced in the LHS. See the reference list at the end of the LHS.</p>
Public/patient/client experience information	LHS Consultation and engagement Report, May 2025.	In total over 1,100 people and 34 organisations were involved in LHS consultation and engagement activity.

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>Engagement carried out May 2024 – April 2025.</p> <p>Engagement with Council tenants includes annual survey, focus groups, tenant panels, tenant led service inspection and scrutiny, resident and community meetings.</p>	<p>The LHS is informed by; Phase 1 - public survey (May 2024) to ascertain peoples housing priorities for Edinburgh, with 345 responses. The top priority out of 10 choices for respondents was Housing Supply.</p> <p>LHS Phase 2 – Targeted engagement (July – Oct 2024) including participation in forums and partnership meetings along with delivering community outreach sessions for residents and specific groups. Through these methods over 550 people participated. Top responses to the housing priorities question here remained as housing supply apart from U16s who were more concerned to live in safe areas.</p> <p>LHS Phase 3 consultation and engagement included and on-line public consultation on the draft LHS and targeted engagement sessions with minority ethnic groups and organisations working with people with no recourse to public funds. Private sector organisations were encouraged to complete the online consultation on the draft LHS with a response provided by the Scottish Association of Landlords.</p> <p>Tenant surveys since 2015 have shown delivering more affordable housing to be tenants’ top priority with 90% believing it should be a core investment priority.</p>
Evidence of inclusive engagement of people who use the service and involvement findings	LHS Consultation and engagement Report, May 2025. Engagement carried out May 2024 – April 2025.	<p>In promoting and carrying out LHS engagement opportunities a mix of digital and non-digital platforms were used. This included the Council’s website, social media platforms and e-footers, as well as advertising via partner organisations to reach their networks through their webpages, social media platforms, newsletters and word-of-mouth. Posters were displayed in community buildings across the city, a dedicated telephone line was set up and paper copies were available for all materials. Printed information included a “Happy to Translate” reference number for people wishing 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>A range of engagement opportunities were carried out to offer choice and flexibility, in a bid to make the engagement as accessible and inclusive as possible.</p>

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		<p>These included workshops held online and in-person, attendance at a range of different partnerships/ forums as well as a selection of community outreach events. The community outreach events proved particularly effective in reaching out to people who may otherwise not have participated such as; a Learning disabilities group, older adult groups; (Newhaven knitters, Leith Men's shed and a day-care centre for older people in Gracemount), refugees and asylum seekers, Mwamba Conversation café - a minority ethnic group, a primary school and a youth music group in Muirhouse.</p> <p>Engagement findings</p> <p>The full findings from the above are noted in the LHS Consultation and Engagement Report. The report lists key findings and challenges.</p> <p>The key themes that arose across all phases of the LHS engagement were:</p> <ul style="list-style-type: none"> • Housing Supply – this was by far the most frequently recurring theme • Questions around what is meant by affordable housing/ is affordable housing truly affordable? • Lack of funding and competing priorities such building homes vs the costs of energy efficiency standards • High housing costs across all tenures • Comments on specific types of housing: short-term lets, Purpose-Built Student Accommodation and the private rented sector more broadly • Potential impacts of the Housing (Scotland) Bill • New build housing developments and required infrastructure • The need for more accessible housing • The quality of existing homes, especially issues with mould and damp • Requests for better/increased provision of information about housing rights and responsibilities • Neighbourhood safety/ anti-social behaviour
Evidence of unmet need	Yes Homelessness in Scotland update to 30 September 2022	Over the last ten years, Edinburgh's population has grown by more than 57,000 – an increase of 13%. 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 increasing by 28,000.

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	<p data-bbox="483 722 909 786">The Rapid Rehousing Transition Plan (RRTP) 2024</p> <p data-bbox="483 1098 920 1265">Number of households currently registered with EdIndex and average number of bids per property (based on Qtr1 and 2 of 24/25)</p> <p data-bbox="483 1305 909 1369">Housing Emergency Action Plan (HEAP)</p>	<p data-bbox="954 212 2103 339">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 be 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 data-bbox="954 379 2069 515">3,303 households were assessed as homeless, or threatened with homelessness in 2022/23, an increase of 30% on the previous year (2,540). This represents a return to pre-covid levels (3,365 in 2019/20) following a significant reduction during 2020/21 (1,958) (RRTP)</p> <p data-bbox="954 563 2092 659">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 data-bbox="954 715 2103 1018">RRTP provides evidence of pressures in Edinburgh due to lack of settled accommodation for people to move to. Supporting evidence comes from Housing Need and Demand Assessment 2. The RRTP and annual updates sets out position relating to number of homeless households to whom the Council had a duty to find a settled home in 2017/18 vs. number of social rented homes available each year. This highlights lack of social rented homes to meet all needs The RRTP and updates also provides information on the number of people in temporary accommodation and the increase in length of stay in temporary accommodation.</p> <p data-bbox="954 1090 2092 1153">290 households (on average) bid for each home advertised through Key to Choice and 25,633 households are currently registered with EdIndex (Nov 2024 Council data)</p> <p data-bbox="954 1273 2103 1369">As part of the Council's 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).</p>

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		<p>On 25 April 2025, the Council took the decision to suspend the Council House Allocation Policy, to at least 13 June 2025, other than for people who have been awarded Gold Priority or those awaiting discharge from hospital, until the Council is compliant with:</p> <ul style="list-style-type: none"> • The Housing Scotland Act 1987 (as amended), and • The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2022. <p>This urgent action is required to meet unprecedented demand and fulfil the Council's legal responsibilities.</p>
Good practice guidelines	Scottish Government LHS Guidance 2019	Scottish Government LHS Guidance (2019) was followed in the preparation of Edinburgh's LHS.
Carbon emissions generated/reduced data	2019 Carbon Modelling study	<p>In 2019 Edinburgh Council commissioned Napier university to carry out 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 green house gas emissions by +9%, whilst increasing the number of affordable homes by 50%. However, in reality this increase would be lessened because . since November 2020 all new build Council homes have been designed to achieve net zero carbon.</p> <p>The Council's Fourth Quarter Granton Demonstrator Housing development project completed in October 2024. It used offsite construction principles which has the potential to reduce construction site emissions further.</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.</p> <p>A new Social Housing Net Zero Standard (SHNZS) in Scotland will replace the EESSH2. It includes a proposal for a “fabric efficiency rating” equivalent to current EPC rating between B and C.</p> <p>The above measures for new build and existing Social rent homes will have a positive impact on the lives of tenants reducing heating demand and energy costs and improving indoor air quality and comfort.</p>

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		An Energy Advice Service is in place for Council tenants. Between February 2023 and January 2024, the service supported 1,529 tenants, and helped to deliver c.£296k financial savings to tenants and c.300,000 kg of carbon savings.
Environmental data	Internal Edinburgh Council data sources	<p>All new build homes must meet current Scottish Building Standards. In addition RSL social house build and Council social house building requirements are higher than general build standards.</p> <p>All local authorities are required to create a Local Heat and Energy Efficiency Strategy (LHEES) and Delivery Plan. Edinburgh LHEES, approved in Dec 2023, covers a 20-year journey to decarbonisation. The LHEES focuses on improving energy efficiency and reducing carbon emissions in different building types, in both residential sector (housing of all tenures) and services sector (all non-domestic buildings in the public and commercial sector), and heat networks across the city.</p> <p>Over the last 12 years, to 2024, over 800 mostly small scale locally nominated projects have been delivered throughout the city on housing account land through the Estates Improvement Programme (EIP) formerly known as Neighbourhood Environment Projects (NEPs). Engagement with Council tenants in 2022 led to a new approach to delivering small to medium scale local estate improvement projects which are now quicker, more responsive and more comprehensive. The programme focuses on landscaping investment, improvements to communal gardens and preparation for community growing areas, delivering greener, more climate friendly and biodiverse projects.</p> <p>The Community Gardens project is into its fourth year, with support provided to 40+ existing community gardens and three new community gardens more recently established.</p> <p>The LHS references and supports wider corporate activities to improve and maintain greenspaces, recognising the twin challenge of the Biodiversity Crisis and Climate Change. The strategy reaffirms the Council's declaration of a Nature Emergency and sets out a commitment for increasing collaboration across Housing and Parks and Greenspaces.</p>
Risk from cumulative impacts	Yes	Private sector rents and private houses for sale are at the highest levels ever recorded in the City. (City lets data 2025).

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 Scottish Government's 'Rent affordability in the affordable housing sector' report (June 2019) states that, 'Based on research, a rent can be considered affordable when housing costs do not consume more than 30-40% of households' incomes'.</p> <p>Affordability calculations for the private rented sector, based on the average gross household income for Edinburgh and average new rental costs in Edinburgh, show that, almost one third (28%) of average monthly gross household income is spent on rental costs. (This is based on average monthly gross household income of £4,861 (CACI 2023/24) and average monthly rent for a 2-bedroom apartment of £1,370 (CityLets Optilet 2023/24).</p> <p>In addition, the 'cost-of-living crisis' means that residents across Edinburgh are all facing increasing costs, in all aspects of their daily lives.</p> <p>Most Council tenants (70% to 80%) are supported by receiving assistance with their rent through Housing Benefit or the housing element of Universal Credit. For Council tenants heating charges will be frozen in 2024/25 while a detailed review is being carried out.</p> <p>In February 2024, councillors agreed to increase rent by 7% every year, for five years, starting in April 2024. This longer-term strategy aims to give tenants more certainty about the rent they'll pay and help the Council to better plan spending to improve homes and services. If Council tenant's rents were not increased, then planned capital investment to improve properties would need to be significantly reduced. Tenants experiencing financial hardship can apply for support from the Council's Tenant Hardship Fund.</p>
Other (please specify)		
Additional evidence required		<p>At the conclusion of the first two phases of LHS engagement, some opportunities to further strengthen engagement were identified. As a result phase 3 included dedicated engagement with a minority ethnic group, refugees and practitioners who work with individuals with no recourse to public funds. Further organisational responses were also received during phase 3, including from from the private sector; the Scottish Association of Landlords and Homes for Scotland.</p>

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>The Local Housing Strategy should have a positive impact on tackling inequality through investment in new affordable tenure homes for people on low to medium incomes. It was highlighted within the LHS engagement that inequality is experienced more acutely for certain groups who are highlighted in section 7 above.</p> <p>Increased access to affordable housing and well-designed, safer and cleaner neighbourhoods will contribute to improved health, reduce fuel poverty and provide homes which are physically accessible.</p> <p>The majority of new build properties delivered by the Council and its housing association partners are accessible for people of limited mobility, meaning limited mobility needs housing requirements can often be met through allocation of a standard property.</p> <p>Each year the AHSP allocates around £1,000,000 for adaptations made by RSLs for tenants to enable people to remain in their own homes and to live independently. In addition to this, the Council funds adaptations to Council homes through the HRA.</p> <p>The Rapid Rehousing Transition Plan (RRTP) had many goals including; preventing homelessness, seeking to reduce the amount of time that homeless people spend in temporary accommodation, ensure homeless households have access to settled, mainstream housing as quickly as possible and increasing access to the PRS by developing a dedicated team of housing officers to assist with this.</p> <p>In addition the RRTP details how the care leavers housing protocol's aim is to avoid care leavers having to go through the homeless route to secure accommodation, instead they will be supported and awarded Exceptional Housing Need priority, which will give them a reasonable preference when bidding for social rented accommodation. This remains an ongoing area of work to strengthen support for these individuals.</p> <p>Pathways for people leaving prison or hospital will improve access to homelessness services and other supports.</p> <p>The RRTP aims to eliminate the use of unsuitable accommodation such as bed and breakfast accommodation for vulnerable children and adults. Work is underway at present to accelerate this process and to develop a long-term strategy to change the mix of temporary accommodation in the city.</p> <p>The Multi-Disciplinary Team (MDT) improve access to services for hard to reach people who would not normally engage with services. Vulnerable children and adults are impacted positively through new and additional resource to support them. The team support vulnerable</p>	<p>City-wide All Edinburgh's residents living in all tenures of housing across the City, including people who are homeless.</p> <p>Homeseekers and people who are homeless with general, varying and complex needs and different economic status.</p> <p>Young people leaving care settings</p> <p>Those leaving prison</p> <p>Homeless Households and children and vulnerable adults</p> <p>Vulnerable families Vulnerable due to age People impacted due to Poverty</p>

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
<p>adults and children to prevent homelessness and offer joined up support to do so. In addition innovative models of temporary accommodation will be developed including increasing the number of temporary furnished flats, supporting those with no funds to furnish a flat.</p> <p>Improved support and increases housing levels for women and families fleeing from domestic violence through work detailed in the LHS Homelessness Chapter.</p> <p>The RRTP is being mainstreamed into the LHS and ongoing actions will continue to be delivered.</p>	<p>Women and families affected by domestic violence</p>
<p>Negative</p> <p>Building activities may cause disruption to existing residents through noise or congestion from construction vehicles. The Council enforces 'commercial and construction noise' guidance to enforce time restrictions over evenings and weekends to minimise disruption to local residents.</p> <p>By prioritising support for homeless households, other vulnerable groups may be adversely impacted as more lets may go to homeless households</p> <p>The RRTP may foster negative relations between people with protected characteristics due to the volume of social housing lets being allocated to this group.</p>	<p>City-wide</p> <p>This includes but is not limited to people who are vulnerable due to Age, Sex, Race and Disability</p> <p>People who are recently homeless</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive</p> <p>New homes are built to high standards in terms of resource efficiency (energy/materials etc.) and sustainability.</p> <p>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 and implementation of the new Edinburgh Local Heat and Energy Efficiency Strategy (LHEES) by reducing poor energy efficiency as a driver for fuel poverty.</p> <p>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.</p> <p>Priority is given to developing homes on brownfield sites and therefore avoiding development on greenfield land.</p>	<p>City-wide</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>The physical environment of brownfield sites will be improved e.g. quality of housing & public space.</p> <p>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.</p> <p>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 be 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.</p> <p>Protecting, restoring and encouraging nature will also be considered in the design of the buildings</p>	
<p>Negative</p> <p>Building new homes inevitably creates embodied carbon dioxide emissions through the creation and transport of building materials to the site, transporting of waste away from building sites and demolition can also cause pollution to the land and the air. Carbon emissions are also created by tenants and residents when they heat and light their homes. All builders have sustainability policies and environmental impact assessments are carried out to protect the environment as much as possible in the construction phase. In addition 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</p>	City-wide

Economic	Affected populations
<p>Positive</p> <p>Driving poverty downwards can only be achieved by providing sufficient levels of affordable housing.</p> <p>There is a council-wide commitment to ending poverty in Edinburgh with targets set by the Edinburgh Poverty Commission. There is a focus on delivering new prevention service models and intervening before the point of crisis to prevent homelessness where possible.</p> <p>Delivering more affordable homes will generate additional investment in the local and national economy and should improve affordability, reduce income inequality, boost jobs, reduce benefit expenditure and impact positively on the growth of GDP.</p> <p>Income maximisation is being provided through tenant and homelessness support activities.</p> <p>Affordable housing delivery is essential to attracting and retaining a skills base that would encourage inward investment and inclusive neighbourhoods.</p>	<p>City-wide including;</p> <p>Homeless households, People affected by poverty and inequality,</p> <p>Young and older people and all people with protected characteristics affected by homelessness</p> <p>Vulnerable families including women affected by domestic abuse</p>

Economic	Affected populations
Maximise income and /or reduce income inequality through the RRTP, including promotion of employability services.	Homeless households People affected by Poverty and Inequality
Negative None identified	City-wide

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?

Through house-building work the procurement processes consider sustainability and environmental impacts. Contractors are also required to comply with The Equalities Act 2010, which legally protects people from discrimination and concerns human rights.

Affordable Housing Supply Programme 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.

Some services commissioned via the Council's Rapid Rehousing Transition Plan (RRTP) are provided by the third sector. The third sector are required to have up to date equality policies and will be monitored to ensure that they are open to all protected characteristics or when not have the correct exemptions in law (e.g. single sex services)

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.

Edinburgh's finalised Local Housing Strategy will be made available online. A summary of the final report will also be produced using simplified accessible language.

The communication routes to promote the strategy will be varied using a mix of digital and non-digital platforms. This will include use of the Council's website, social media platforms and e-footers, as well as advertising via partner organisations to reach their networks through their webpages, social media platforms, newsletters and word-of-mouth. Posters will be displayed in community buildings across the city, a dedicated telephone line is available if anyone would like to request paper copies which will be available.

The Council is a member of 'Happy to Translate' supporting engagement with customers who have little or no written English.

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 Strategic Environmental Assessment ([SEA](#)) 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.

Further evidence was gathered, as part of phase 3 of the engagement, from the private sector, minority ethnic people, refugees/ asylum seekers and people with no recourse to public funds. Information from this further engagement has been included in the LHS consultation and engagement report and in this IIA.

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:

Actions were identified in the draft IIA to carry out further targeted engagement. This engagement has been completed as part of phase 3. There will be ongoing monitoring of the Local Housing Strategy to ensure that all actions are progressed.

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 date to progress	Review date
LHS Performance and progress monitoring The LHS is a live document. An annual review of the action plan milestones and measures will be carried out. Actions will be altered or added to as required, to meet emerging issues over the duration of the strategy.	Housing and Homelessness Strategy Team	Annual	May 2026 for first annual review and ongoing
Updating the LHS IIA Carry out an annual review of the LHS Integrated Impact Assessment (IIA)	Housing and Homelessness Strategy Team	Annual	May 2026

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?

There will be ongoing monitoring of the LHS and the action plan, with a comprehensive annual update process including an annual review of the LHS IIA.

16. Sign off by Head of Service

Name: Lisa Mallon, Head of Strategy, Commissioning & Service Improvement

Name: Derek McGowan, Service Director for Housing and Homelessness

Date: 15/05/2025

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/