

**Supporting Good Decisions**

**Promoting Equality & Human Rights, Reducing Inequality and Protecting the Environment**

**Integrated Impact Assessment Form**

**Integrated Impact Assessment Form**

**Promoting Equality, Human Rights and Sustainability**

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| **Title of Policy/ Proposal** | Strategic Housing Investment Plan 2025/26-2029/30 |
| **Timescale for Implementation**  | 2025/26 – 2029/30 |
| **IIA Completion Date** | 06/11/2024 |
| **Completed by** | Rebecca Pringle, Team Manager – Housing Strategy  |
|  **Lead officer** | Wendy McGuire – Head of Housing  |

**Section 1: Screening**

**1.1 Briefly describe the policy/proposal/activity you are assessing.**

Set out a clear understanding of the purpose of the policy/ proposal/ activity being developed or reviewed (e.g. objectives, aims) including the context within which it will operate.

This SHIP covers the 5-year period 2025/26 – 2029/30 and has been prepared in accordance with revised Scottish Government Guidance, ‘*Preparing Strategic Housing Investment Plans’* (20 June 2024).

The purpose of the SHIP is to set out East Lothian’s strategic housing investment priorities for the next five years. The SHIP contributes towards achieving the outcomes set out in the Local Housing Strategy (LHS) and demonstrates how they will be delivered through a range of funding streams. It is an operational working tool to improve long-term strategic planning and investment and identifies the strategic housing projects and investment required to help achieve the Scottish Government’s targets within Housing to 2040.

The SHIP ensures that the priorities set out nationally align with the priorities identified within the local authority’s LHS, and prioritises developments around need and deliverability.

This year’s SHIP has been prepared in another challenging year with construction costs rising, increasing demand together with local and national budget constraints and all within the context of the Scottish Government’s Housing Emergency which was declared in May 2024.

The ability to deliver our extensive and ambitious programme is dependent on many factors such as land supply, construction costs, the labour market and the investment from the Scottish Government.

This IIA is primarily concerned with the reduction in Scottish Government Affordable Housing Supply Programme budget which will see the permanent loss of affordable housing in East Lothian. It is recognised that the affordable housing which is able to be delivered by this SHIP will contribute to the alleviation of poverty and homelessness for some households. But the overall loss of funding and units, will outweigh the positive impacts the SHIP could contribute to the households and communities in East Lothian.

* 1. **What will change as a result of this policy?**

Based on the resource allocation from the Scottish Government received to 2028, we can only achieve 281 site starts and 340 completions through the Scottish Government’s Affordable Housing Supply Programme (this includes an additional 27% slippage). The impact of the recent reduction is significant with the potential loss of 1,266 units over the period of this SHIP and we are at risk of losing 793 units based on those unconstrained sites that could realistically come forward.

The impact of this is already live with four sites where developers are in a position to enter into contracts with a site start planned for this financial year. Officers are exploring all options to secure sites through exploration of land acquisitions, swapping of sites, intermediate tenures, innovative finance, however even after exploring these alternative options, two sites are at a stage where the only likely option will be to take a commuted sum. These commuted sums will only provide the Council with a land value and will not allow the Council to deliver the same number of units elsewhere. The impact of this option is the risk of a permanent loss of affordable units in areas where there is high need.

* 1. **Deciding if a full Impact Assessment is needed.**

Please answer the following questions:

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| --- | --- | --- |
|  | **Yes** | **No** |
| 1. The policy/ proposal has consequences for or affects people e.g. how they can access a service?
 | x |  |
| 1. The policy/proposal has potential to make a significant impact on equality?
 | x |  |
| 1. The policy/proposal is likely to have a significant environmental impact?
 |  | x |
| 1. The policy/ proposal has implications for the storage/ collection of personal data?
 |  | x |

* If you have answered yes to questions 1 and 2 above, please proceed to complete the Integrated Impact Assessment. If you have answered No then an IIA does not need to be completed. Please keep a copy of the screening paperwork.
* If you have identified that your project will have a significant environmental impact, please proceed to complete the Integrated Impact Assessment. You will also need to consider whether you need to complete a Strategic Environmental Assessment.
* If you have answered yes to question 4, please seek further advice from the Data Protection Officer.

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**Section 2: Integrated Impact Assessment**

* 1. **Have those who are affected by the policy had the opportunity to comment on new proposals?**

The Strategic Housing Investment Plan (SHIP) is not a public facing consultative document. The Local Housing Strategy 2024-29 (LHS 24-29) sets out the required investment in affordable housing via the Housing Supply Target (HST). This is then subject to wide consultation and engagement. Information of Engagement and Consultation events as well as the methodology behind setting the HST can be found [here](https://www.eastlothian.gov.uk/downloads/download/13895/lhs_supporting_documents). The SHIP is then the operational document which sets out how Scottish Government subsidy will be used to deliver affordable housing, with the aim of meeting the Housing Supply Target. Further information on the relationship between the Local Housing Strategy, Housing Supply Target and Strategic Housing Investment Plan can be found [here.](https://www.eastlothian.gov.uk/downloads/download/13895/lhs_supporting_documents)

* 1. **What information/data have you used to inform the development of the policy to date?**

The development of the SHIP aligns with the Council’s adopted Local Housing Strategy 2024-29 and the most up to date Housing Land Audit, demonstrating how investment in affordable housing will be targeted. It is reviewed and updated annually. It is the key document for identifying the strategic housing projects, which also help to inform the preparation of Council budgets, RSL borrowing and funding support through the Scottish Government’s Strategic Local Programme Agreement. As such, a wide range of information and data I used to inform the SHIP. This includes council housing list data, Housing Revenue Account (HRA) data, information on need and demand from Health and Social Care Partnership (HSCP) and existing Council Policies and Plans. The development of the SHIP also includes a review of the existing SHIP, taking into account projects already committed by partners and the Scottish Government.

* 1. **What does the evidence/ research suggest about the policy’s actual or likely impact on equality groups and those vulnerable/ or experiencing socio-economic disadvantage?**

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| --- | --- |
| **Evidence**  | **Comment** |
| Which groups are in in particular need of this service? | The SHIP sets out the delivery of all affordable housing in the county. This includes homes for social rent, mid-market rent, low-cost home ownership, shared equity etc. East Lothian has a constrained housing market, with a small and expensive private rented sector, large owner-occupied sector with costs approaching that of Edinburgh, and a small but increasing social rented sector. The combination of an already pressurised housing system, where demand for affordable housing outstrips supply, and a reduction in the affordable housing budget, will ultimately affect those in poverty, with the greatest housing need the most. This includes households who are homeless and living in temporary accommodation, women and children fleeing domestic abuse and those with limited or no entitlement to social security such as refugees and unaccompanied asylum-seeking children and young people. It will also affect those who are already in housing need and may be living in overcrowded or unsuitable housing. While the reduction of affordable housing budget, will inevitably impact everyone in the county seeking a home, those who are already subject to some form of inequality or poverty will inevitably be at most risk. The East Lothian Council housing list currently has approximately 2,280 applicants with a turnover of around 500 units per annum. In last year, East Lothian Council new build properties accounted for 22.6% of homeless allocations made by the Council in the last financial year. The reduction in grant funding, and therefore the reduction on the number of new affordable homes will therefore have a significant impact on the Council’s ability to meet its statutory duty to accommodate homeless households. It is also likely to increase the number of households we see seeking homeless applications. A decline in affordable homes has a knock-on effect on the entire housing system, resulting in a shrinking of options which may lead those with the least options to seek support form the Council via the housing list.  |
| What level of service uptake/ access is there from protected and vulnerable groups? |
| Can you identify positive outcomes for service users |
| What is the service user experience of those from protected or vulnerable groups? |
| What opportunity have those from protected groups had to co-produce or comment on the service/ plans? |

* 1. **How does the policy meet the different needs of groups in the community?**

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| **Equality Groups*** Older people, people in the middle years

 * Children and young people
* Women, men and transgender people (includes issues relating to pregnancy and maternity)
* Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems)
* Minority ethnic people (includes Gypsy/Travellers, migrant workers)
* Refugees and asylum seekers
* People with different religions or beliefs (includes people with no religion or belief)
* Lesbian, gay, bisexual and heterosexual people
* People who are unmarried, married or in a civil partnership
 | The reduction in grant does not meet the different needs of groups in the community. Despite the fact that people are living for longer, healthy life expectancy is not increasing. Meaning that while people live for longer, they do so with multiple health conditions. This has a knock-on effect on the types of homes that are required. This is especially true for East Lothian which has the second fastest growing population in Scotland, and a significant aging population. Legislation requires social housing to be compliant with Housing for Varying Needs (HfVN) standards – unlike housing in the private sector. This means that those who are unable to afford to make major adaptations to their home to meet their needs such as households with one or more member of the family with a disability, rely on social housing to meet their needs. East Lothian Council already has a limited stock of properties which are adaptable and are reliant on the new build program to increase the number of wheelchair accessible homes. The reduction in grant will mean that households with disabilities or health conditions, who require accessible homes, needs will not be met. This has a knock-on effect to a range of other areas. For example, if an individual is unable to get around their home sufficiently to meet their basic needs such as washing and cleaning themselves, they may need formal or informal care. The reduction in the number of wheelchair accessible homes and homes built to HfVN standards, also affects children and young people with disabilities. There is a rising number of families where one or more children have multiple needs. To ensure their needs are met, East Lothian Council will be required to extend existing homes, a costly and inefficient method. The Local Housing Strategy 2024-29 sets out a commitment with HSCP to delivery 50 units of core and cluster housing for individuals with learning disabilities or mental health conditions over the period of the LHS. This is a highly effective model, providing either high quality temporary accommodation for rehabilitation or permanent housing for those who require over 20+ hours of social care per week. Providing regular tenancies with allocated care and support provides a vital service for individuals who may have been placed out of area due to otherwise limited resources. Thus, core and cluster models provide a significant cost saving for HSCP as well as meeting the needs of some of the most vulnerable residents in East Lothian. With the reduction in affordable housing, there will be a requirement to re-calculate the number of core & cluster homes we are able to provide. This has the potential to leave individuals out with area, in hospital for longer, or in an unsuitable environment. Refugees and Asylum seekers including Unaccompanied Children and Young People will also be adversely impacted by the reduction in funding for affordable housing. It is estimated that around 150 Ukrainian households have been accommodated in East Lothian, plus around 500 households living in the County. This additional number of households in housing need has a knock-on effect on the entire housing system, limiting already scarce properties in the private sector even further. Additional households are anticipated via the Asylum Dispersal Scheme/Afghan Refugee Scheme in 2025/26 and beyond. The reduction in grant funding for affordable homes will ultimately mean that these vulnerable households could be placed in unsuitable accommodation. There is a growing need for suitable housing for UASC, especially those arriving over the age of 16 who can be placed outwith foster and residential homes. At present, East Lothian Council has utilised flatshare with support for this purpose. However, the lack of ability to plan for the numbers of UASC arriving to East Lothian coupled with the reduction in budget for affordable homes, is likely to mean that UASC will be placed out of area in expensive unsuitable accommodation. This could serve to re-traumatize young people, leaving them open to further exploitation. Women and children who are subjected to domestic abuse are also at risk of suffering the severe consequences of the reduction in grant funding. Where woman seek refuge via Women’s Aid, a bottleneck will arise as women cannot move on to permanent homes as quickly. This leaves women and children with little choice but to remain with an abuser until a place in refuge becomes available. We know from previous consultations, that moving to unknown temporary accommodation which doesn’t provide the same levels of support and security as refuge is a daunting prospect for women, often leaving them at higher risk than when living with the perpetrator.  |
| **Those vulnerable to falling into poverty*** Unemployed
* People on benefits
* Lone Parents
* Care experienced children and young people
* Carers (including young carers)
* Homeless people
* Those involved in the community justice system
* People with low literacy/numeracy
* Families with 3 or more children
* Those with a child/ children under 1
 | Access to affordable housing is widely recognised as a key resource to lifting people out of, and preventing, poverty. Therefore, the reduction of affordable housing in the county will only serve to increase poverty, especially amongst all of those most at risk. This will be especially true for groups such as single person households or families with children or more due to the lack of 1 bed properties and larger social homes across the County. The reduction in funding and subsequent reduction in new affordable homes will increase the Council’s risk of breaching our legal obligations under the Housing (Scotland) Act 2001, the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 (as amended) and the Homelessness (Scotland) Act 2003. Homelessness is likely to increase as the local housing system becomes even more constrained. Those most vulnerable to falling into poverty (as named at the side) will also be most at risk of experiencing homelessness.  |
| **Geographical communities*** Rural/ semi rural communities
* Urban Communities
* Coastal communities
* Those living in the most deprived communities (bottom 20% SIMD areas)
 | The reduction in affordable housing grant will mean that ELC is unable to balance the housing system in East Lothian. This results in Urban areas such as Musselburgh facing high levels of deprivation as poverty and housing need is concentrated. It will be harder to meet the needs of households in rural and semi-rural homes with the reduction in budget. Homes in rural areas are more expensive to build, especially as we seek to be sensitive to the local area, looking at small scale developments.  |
| **Communication Needs:*** Gaelic Language Speakers
* BSL users
* English as a Second Language
* Other e.g. DeafBlind, Plain English, Large Print
 | n/a  |

* 1. **Are there any other factors which will affect the way this policy impacts on the community or staff groups?**

A reduction in the number of affordable homes available to rent will result in an increased demand for a range of services including as households seek to find housing solutions:

* Advocacy
* Housing Support
* Homelessness
* Financial Inclusion
* Charities and Third Sector Groups who are providing support to households I the community.

Housing is a highly emotive subject, given that our lives revolve around a home to live in and support us as children and adults. As such, there will be an increased need for services to take a trauma informed approach when working with those in housing need especially as housing options decrease.

This is also likely to put strain on frontline staff as they face pressures of service users and advocacy and support organisations to help individuals find solutions. This applies to not only housing and homelessness staff, but others who rely on housing to help meet statutory duties. For example, Children’s Services duties to care experienced young people. Consideration should be given to ensure burnout and stress levels do not increase.

* 1. **Is any part of this policy/ service to be carried out wholly or partly by contractors?**

If yes, how have you included equality and human rights considerations into the contract?

Not applicable

* 1. **Have you considered how you will communicate information about this policy or policy change to those affected e.g. to those with hearing loss, speech impairment or English as a second language?**

The SHIP will be made available on the Council’s online website. The website offers accessibility options through the Recite Me translation service allowing people to translate, change contrast and colours and read the website aloud.

The council offers a Translation and Interpretation Service and will respond to requests for the plan to be available in the requested language including BSL. Services arranged include:

• Interpretation in a wide range of world languages.

• Phone interpretation.

• Translation.

• BSL signing.

• Lip-speaking.

• Note-taking.

• Braille.

The service is provided by accredited interpreters and translators. All frontline staff are provided with language charts, which help clients with no English to identify their own language, so that interpretation support can be arranged. Service requests can be also made by emailing translation@eastlothian.gov.uk .

* 1. **Please consider how your policy will impact on each of the following?**

|  |
| --- |
| **Equality and Human rights*** Promotes / advances equality of opportunity e.g. improves access to and quality of services
* Promotes good relations within and between people with protected characteristics and tackles harassment
* Promotes participation, is inclusive and gives people control over decisions which affect them
* Preserves dignity and self-respect of individuals (does not lead to degrading treatment or stigma)
* Builds support networks, resilience, community capacity
 |
| Comments:A reduced budget to deliver affordable homes will impact equality and human rights negatively in East Lothian. When essentials such as Housing are in limited supply it reduces the control individuals have over their own lives. This can lead to feelings of worthlessness as well as anger – reducing personal resilience as well as capacity to respond to other stresses and strains in life. Community tensions can increase as judgements are made about those who are “deserving”. The reduction in affordable housing will also mean that some developments are 100% market housing. This does not reflect inclusive and welcoming communities, and risks vulnerable groups being isolated and stigmatised.  |
| **Reduces Poverty*** Maximises income and/or reduces income inequality
* Helps young people into positive destinations
* Aids those returning to and those progressing within the labour market
* Improves employability skills, including literacy and numeracy
* Reduces the costs of taking part in activities and opportunities
* Reduces the cost of living
 |
| Comments :A reduction in the number of affordable housing units the Council is able to build, will result in an overall loss of affordable housing as the number of market housing increases over the same period. This means that the demand for homes to rent or buy in the lower quartile rent/mortgage will be higher. This will likely lead to individuals having to pay a larger amount of their income on housing, a luxury that many cannot afford within the current cost of living crisis. This will increase inequalities within the county and limit the extent to which people can progress in their lives. It will reduce individuals overall surplus income leading to a reduction in taking part of activities and opportunities. It is also likely to go even further to that and contribute to higher levels of fuel poverty as people cannot afford to put their heating on, and higher levels of food poverty.  |
| **Protecting the Environment and Improving Sustainability**:* Reduces the need to travel or increases access to sustainable forms of transport
* Minimises waste / encourages resource efficiency / contributes to the circular economy
* Ensures goods / services are from ethical, responsible and sustainable sources
* Improves energy efficiency / uses low carbon energy sources
* Protects and/or enhances natural environments / habitats / biodiversity
* Promotes the transition to a low carbon economy
* Prepares and/or adapts communities for climate change impacts
 |
| Comments:n/a |

**Section 3. Action Plan**

What, if any changes will be made to the proposal/ policy as a result of the assessment?

There are limited changes which can be made to the SHIP. Changes which would mitigate what has been set out in this report, rely fully on additional Scottish Government Funding.

A range of actions including writing to the UK and Scottish Government to seek additional funding will be made following relevant papers being presented to Council.

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| --- | --- | --- | --- | --- |
| **Changes to be made** | **Expected outcome of the change** | **Resources Required** | **Timeline** | **Responsible person** |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

**Sign off by Head of Service**

Name Wendy McGuire

Date 06.11.24