

**REPORT TO:** Cabinet

**MEETING DATE:** 22 January 2019

**BY:** Depute Chief Executive (Partnerships and Community Services)

**SUBJECT:** Draft East Lothian Rapid Rehousing Transition Plan 2019/20–2023/24

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## **1 PURPOSE**

- 1.1 To advise Cabinet of the newly titled strategic policy objective ‘rapid rehousing’ and present the draft East Lothian Rapid Rehousing Transition Plan (RRTP) 2019/20–2023/24 prior to Scottish Government assessment and evaluation.

## **2 RECOMMENDATIONS**

- 2.1 Cabinet is recommended to approve the draft East Lothian RRTP 2019/20-2023/24 as submitted to the Scottish Government, including the aims of the draft RRTP, associated work required to achieve these aims and corresponding request for additional resources totalling £7.221m if East Lothian Council is to achieve own aims under rapid rehousing by 31 March 2024 (£5.225m capital funding and £1.996m revenue funding).

## **3 BACKGROUND**

- 3.1 The Homelessness and Rough Sleeping Action Group (HARSAG) was established by the Scottish Government in October 2017 to consider solutions to end homelessness and rough sleeping. Four suites of recommendations were made in December 2017 and in February, May and June 2018, with the majority of final recommendations accepted by Scottish Ministers across the spectrum of Parliament and welcomed in principle by ALACHO and COSLA in June 2018. The swift transition to a ‘Rapid Rehousing’ approach, to include an element of ‘*Housing First*’ comprises the cornerstone of recommendations.
- 3.2 The key aims of rapid rehousing are to end rough sleeping; transform the use of temporary accommodation and contribute to ending

homelessness across Scotland. Where homelessness cannot be prevented, rapid rehousing refers to:

- A settled, mainstream housing outcome as quickly as possible;
- Time spent in any form of temporary accommodation reduced to a minimum, with the fewer transitions the better; and
- When temporary accommodation is needed, the optimum type is mainstream, furnished and within a community.

3.3 While rehousing is expected to be 'rapid', it must also be appropriate, with support in place for households with multiple and complex needs. It is anticipated RRTPs will include an element of '*Housing First*', which refers to a specific model of combined accommodation and support. Housing First places vulnerable homeless people in permanent tenancies from the outset with a comprehensive package of support, as opposed to homeless people starting in temporary accommodation and gradually progressing through services towards independent living. For homeless people with multiple needs beyond housing, Housing First:

- Comprises the first response for people with complex needs and facing multiple disadvantages.
- Recognises a safe and secure home as the best base for recovery and offers personalised, open-ended flexible support for people to end their experience of homelessness and address wider needs.
- Separates the provision of housing and support, offers choice and control to tenants and works to the principles of harm reduction.
- Advocates the use of highly specialist provision within small, shared, supported and trauma informed accommodation, if mainstream housing is not possible or preferable.

In accordance with Housing First, Health and Social Care Partnerships should consider whether housing support and supported accommodation options continue to be part of a local homelessness response or whether their specialist nature aligns them to the health and social care strategic plan and corresponding commissioning frameworks.

3.4 The Council has made some good progress in respect of tackling homelessness in recent years. The homeless prevention approach continues to provide multi-tenure tenancy support to around 425 applicants a year with a 90% success rate in preventing homelessness. As a result of this intervention there has been a reduction in homeless presentations of around 35% since changes to homelessness legislation in 2012. The Cabinet approved a Homelessness Action Plan in November 2017, to ensure legal obligations continue to be met towards homeless clients and enable mitigating actions to be put in place in

respect of the impact of the amendment to the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014. A number of successful outcomes have been achieved to date in respect of the Action Plan, including permanent housing of a number of long-standing cases. Progress is also being made with the Allocations Policy review and void turnover performance.

- 3.5 1,597 new affordable homes have been delivered within East Lothian since 2007, of which 752 are new council homes for social rent. 708 have been delivered through our Housing Association partners again for social rent, with a further 137 intermediate tenures such as discounted sale and mid-market rent delivered through other financial models.
- 3.6 The adopted ELLDP sets out substantial housing land supply that presents an unprecedented opportunity to provide new affordable housing at pace and scale. The Draft Strategic Housing Investment Plan (SHIP) 2019/20 - 2023/24 sets out an ambition to deliver a further 1,000 new affordable homes including 489 new socially rented Council homes. These will be delivered through the Scottish Government's Housing Supply Programme including the council's new-build programme, the housing association's programme and other financial models, over the next five years.
- 3.7 The Council is also developing its supporting Supplementary Guidance on Affordable Housing and its Local Investment Framework on the back of ELLDP 2018 adoption and is engaged with Scottish Government on its review of Housing Beyond 2021.
- 3.8 Notwithstanding this, the Council continues to face significant homelessness challenges including increasing applications; continuing dependence on B&B for temporary accommodation; provision of support for vulnerable households with complex needs; and wider demand pressures on socially rented affordable homes within East Lothian, as detailed in SESplan HNDA2<sup>1</sup>. It will be important to carefully manage expectations against the delivery of the HARSAG recommendations as accepted by Scottish Ministers.
- 3.9 HARSAG recommends a five year timescale for the transition to Rapid Rehousing (2019/20 to 2023/24), with costed draft Plans submitted to the Scottish Government by 31 December 2018, for subsequent assessment and evaluation. Circa £19m will subsequently be distributed across the 32 local authorities, taking cognisance of costed RRTPs.

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<sup>1</sup> <https://sesplan.gov.uk/assets/images/HNDA/FINAL%20SESPLAN%20HNDA2.pdf>

3.10 A draft East Lothian RRTP 2019/20 to 2023/24 has been prepared and submitted to the Scottish Government for assessment and evaluation (attached as Appendix 1). It aims to:

- create 860 new tenancies (over and above 2017/18 levels)
- create an additional 102 units of new affordable housing supply
- re-designate 150 temporary units as permanent accommodation
- reduce temporary furnished flats from 332 to 182
- reduce length of stay in B&B to a maximum of 7 days for all households
- reduce length of stay to a maximum of 9 months in temporary accommodation
- create 50 Housing First placements

The RRTP will aim to make a meaningful, although realistic impact by 2023/24, with a recognition that further ongoing action will be required to work towards more ambitious aspirations to end homelessness across the county in the longer term.

3.11 To assist local authorities and key partners to take a consistent approach to developing RRTPs across Scotland, HARSAG commissioned the preparation of a planning and implementation framework for Rapid Rehousing, with '*Scotland's Transition to Rapid Rehousing: Market Area Analysis, Legislative and Culture Review*' published in June 2018. The framework sits alongside *Scotland's Transition to Rapid Rehousing: Guidance for Local Authorities and Partners* (2018) and a *Rapid Rehousing Transition Tool*, to assist Plans to be calculated and costed. A link to the framework, Guidance and tool is available at 7.2 of this report.

3.12 Following completion of the Scottish Government assessment and evaluation and corresponding resource allocation, amendments will be made to the draft RRTP and the final East Lothian RRTP will then be presented to Cabinet and the Integrated Joint Board (IJB) in May for formal approval.

## **4 POLICY IMPLICATIONS**

4.1 There are no policy implications directly arising from preparation of the draft East Lothian RRTP 2019/20 – 2023/24. Key aims, priority outcomes and actions set out in the Plan complement and / or align with the wider objectives of the Council Plan 2017-22; East Lothian Local Outcome Improvement Plan 2017-27 and the East Lothian Local Housing Strategy 2018-23.

## **5 INTEGRATED IMPACT ASSESSMENT**

5.1 The subject of this report has been through the Integrated Impact Assessment process and where negative impacts have been identified,

mitigating actions will be put in place. The Integrated Impact Assessment process will be reviewed prior to publication of the final Plan.

## **6 RESOURCE IMPLICATIONS**

- 6.1 Financial – The draft RRTP sets out a requirement for £7.221m to achieve rapid rehousing by 31 March 2024 (£5.225m capital funding and £1.996m revenue funding). In addition, meeting the aspirations of the RRTP is dependent on increasing the supply of affordable housing. Accordingly the draft RRTP clearly states that the resource allocation of £57.871m set out in the draft East Lothian SHIP 2019/20-2023/24 for the delivery of 1,070 units to 2023/24 is critical. The draft RRTP also acknowledges that continuation of the Scottish Government resource allocation of £785k (to fund the provision of homelessness prevention and services during 2017/18 and 2018/19 following the abolition by the DWP of the management fee for temporary accommodation) in 2019/20 is also key, to provide stability and minimise risk as the Council transitions towards a rapid rehousing approach.

The Scottish Government confirmed in December 2018 that it will distribute up to £2million across the 32 local authorities in March 2019 for the preparation of RRTPs, albeit that these have now been prepared, with £40k to be allocated to East Lothian Council.

The remaining £19m from the Ending Homelessness Together Fund will be allocated to local authorities on the basis of assessment and evaluation of costed RRTPs by the Scottish Government in Spring 2019. Criteria for assessment and evaluation is currently being developed by the Scottish Government. Resources allocated by Scottish Government to meet costed interventions identified through RRTPs will be for the 5 year period 2019/20 – 2024/25. There will need to be greater clarity provided from the Scottish Government in respect of longer term financial planning commitments and resource allocation for ongoing revenue interventions identified within RRTPs.

Actions set out in the draft RRTP are predicated on the requirement of £7.221m being met in full, within the wider context of a SHIP resource allocation of £57.871m and continuation of £785k homelessness funding in 2019/20. Any departure from this will require the RRTP to be amended when it is presented to Cabinet in May for formal approval.

- 6.2 Personnel – None

- 6.3 Other – None

## **7 BACKGROUND PAPERS**

- 7.1 Appendix 1: Draft East Lothian RRTP



East Lothian RRT  
submission.pdf

7.2 Rapid Rehousing Transition Plan Guidance, framework and transition tool  
<http://www.ghn.org.uk/rapid-rehousing-transition-plan/>

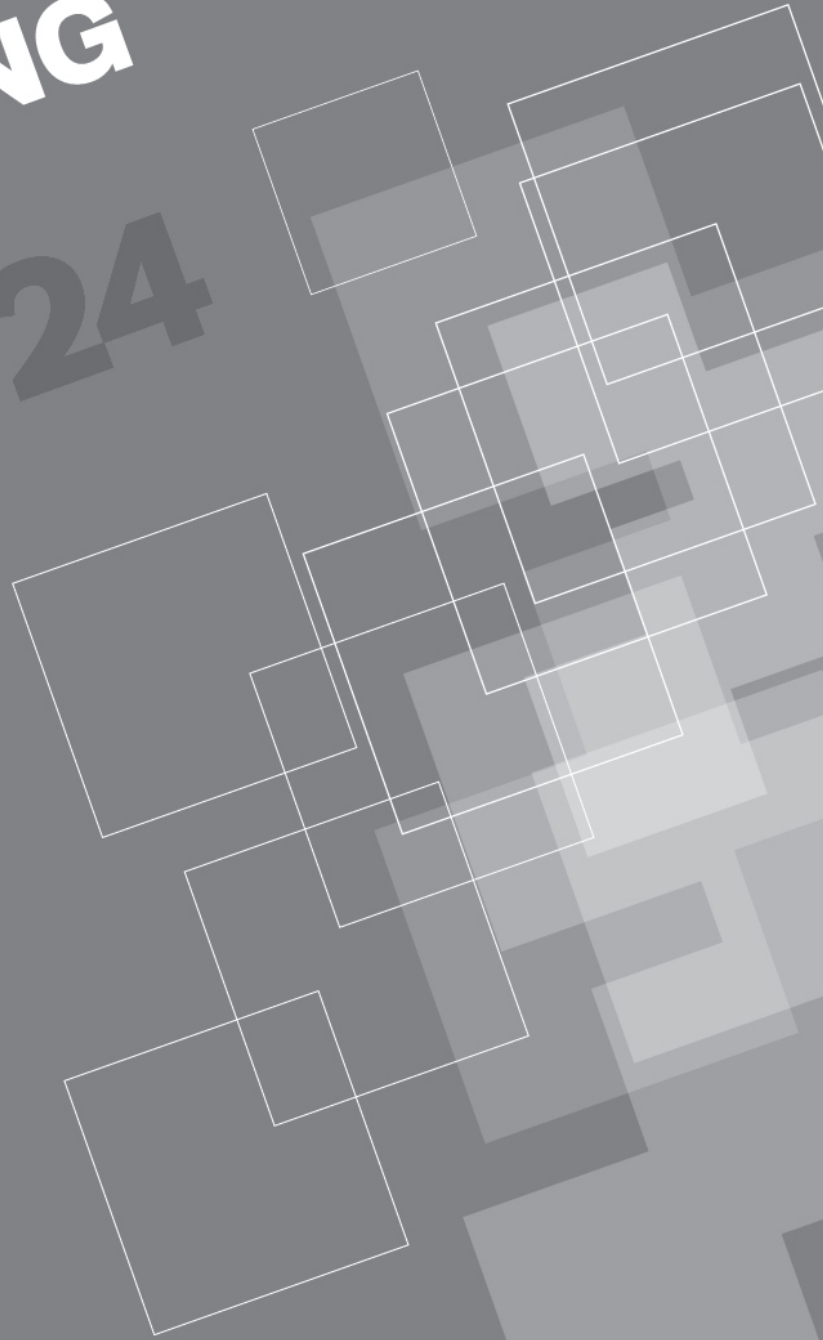
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East Lothian  
Council

EAST LOTHIAN  
**RAPID  
REHOUSING**  
TRANSITION PLAN

**2019-24**







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# The East Lothian Position

**Our Challenge:** East Lothian is part of the highly pressured South East Scotland housing market. There are 3,700 applicants on the Council's housing list with 493 allocations made in 2017/18. 370 additional units of affordable housing are required each year over a 20 year period to meet identified need & demand<sup>1</sup>. Against this backdrop, homeless presentations are rising & average length of stay in temporary accommodation has increased to 377 days. Around 300 households were accommodated in B&B in 2017/18. This RRTP estimates a shortfall of **216 units** per annum for homeless households to 2024.

A recent report commissioned by the Social Bite states:

*'Temporary accommodation pressure is extraordinarily high in East Lothian with 71% of those owed a duty during the year remaining in temporary accommodation at the end of the year, suggesting acute blockages in the 'flow' of households through temporary accommodation... The very long lengths of stay are due to the local housing market, specifically high demand for and low turnover within social housing, a relatively small, expensive and high demand private rented sector and the low level of local authority rents which mean those in temporary accommodation are often unwilling to consider other housing options'<sup>2</sup>.*

**Our Resource Requirements:** This RRTP sets out a requirement for **£7.221m** to achieve Rapid Rehousing by 31 March 2024 (£5.225m capital funding and £1.996m revenue funding). In addition, meeting the aspirations of this RRTP is dependent on increasing the supply of affordable housing. Accordingly, the resource allocation of £57.871m set out in the Strategic Housing Investment Plan (SHIP) for the delivery of 1,070 units to 2023/24 is critical. Continuation of the Scottish Government £785k resource allocation during 2019/20 is also key, to provide stability and minimise risk as we transition to a Rapid Rehousing approach.

**Our Vision:** *'A fresh, new partnership arrangement enables a holistic approach to housing options, ensuring everyone has a home that meets their needs and a commitment to work towards ending homelessness in the longer term'* by 2024.

## Our Aims:

- Create 860 new tenancies (over and above 2017/18 levels)
- Create an additional 102 units of new affordable housing supply
- Re-designate 150 temporary units as permanent accommodation
- Reduce temporary furnished flats from 332 to 182
- Reduce length of stay in B&B to a maximum of 7 days for all households
- Reduce length of stay to a maximum of 9 months in temporary accommodation
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The RRTP will aim to make a meaningful, although realistic impact by 2023/24, with a recognition that further ongoing action will be required to work towards more ambitious aspirations to end homelessness across the county in the longer term.

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<sup>1</sup> <https://sesplan.gov.uk/assets/images/HNDA/FINAL%20SESPLAN%20HNDA2.pdf>

<sup>2</sup>

[file:///C:/Users/sandn/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/5AZZS73F/SB\\_TempAcommReport\\_FinalReport.pdf](file:///C:/Users/sandn/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/5AZZS73F/SB_TempAcommReport_FinalReport.pdf)

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# SECTION 1

Introduction



# 1 Introduction

This section of the RRTP explains the background to the new strategic policy objective 'Rapid Rehousing'. It describes the purpose of this Plan and how it has been developed; outlines the strategic alignment with other key plans and strategies and sets out a vision and corresponding priority outcomes to enable a Rapid Rehousing approach to be achieved by 2024.

## 1.1 Purpose of the Rapid Rehousing Transition Plan

This Rapid Rehousing Transition Plan (RRTP) sets out how East Lothian Council and key partners anticipate making the transition from the current position in respect of homelessness to a Rapid Rehousing approach, over a five year period from 1 April 2019 to 31 March 2024. It sets out proposals to rebalance the local housing system to support improved outcomes for homeless and potentially homeless people, with a focus on increasing prevention and early intervention; reducing length of stay in temporary accommodation and temporary accommodation stock, in favour of providing permanent accommodation and improving flow through the system, increasing access to housing across all tenures.

It provides:

- a detailed evidence base in respect of the current and projected homelessness pressures, temporary accommodation position and balance between housing need and demand and supply
- a vision / priority outcomes for 2024
- a route map showing how the Council and partners intend to achieve the vision
- an estimate of financial support / resources required to achieve transformation

## 1.2 National Strategic and Policy Context

- **Programme for Government / Beyond 2021**

The Scottish Government wants everyone to have a home that is warm, affordable and accessible; to support our most disadvantaged communities and promote wellbeing. In September 2018 the Programme for Government was announced and alongside this, a commitment was set out to work on a vision for how our homes and communities should look and feel in 2040 and consider the options and choices to get there. The proposal is to develop a new approach encompassing the whole housing system across all tenures, including consideration of government expenditure, planning and infrastructure delivery and the interface with other policy areas such as economy, health, social care and the environment. The formal discussion paper states that the delivery of more affordable homes is essential to meeting a host of growing challenges i.e. ending homelessness and tackling child poverty. The discussion runs in parallel with the preparation of RRTPs and it is important to take cognisance of the changing policy context when developing and implementing the RRTP.

- **Homelessness and Rough Sleeping Action Group and Requirement for RRTP's**

The Homelessness and Rough Sleeping Action Group (HARSAG) was established by the Scottish Government in October 2017, to consider solutions to end homelessness and rough sleeping. Four suites of recommendations were made in December 2017, February and May 2018 and final recommendations received and accepted by Scottish Ministers in June 2018. A wide range of legislative / policy change is proposed i.e. in relation to the Homeless Persons (Unsuitable

Accommodation Order) (Scotland); intentionality; local connection; and establishing temporary accommodation standards, providing a challenging context for local authorities to transition towards ending homelessness. *'Rapid Rehousing'* and *'Housing First'* comprise the cornerstone of recommendations, with local authorities asked to prepare a five year 'Rapid Rehousing Transition Plan (RRTP)' and submit to the Scottish Government by 31 December 2018.

The evidence supporting Rapid Rehousing models, including Housing First, is considered to be 'overwhelming'. The HRSAG Interim Report (March 2018) states *'it has international evidence backing it to be the most successful intervention for people sleeping rough and with complex needs. It was also the core recommendation of the Scottish Parliament's cross party Local Government & Communities Report on Homelessness (February 2018)'*.

The key aims of Rapid Rehousing are to end rough sleeping; transform the use of temporary accommodation and contribute to ending homelessness across Scotland. Where homelessness cannot be prevented, the approach refers to:

- A settled, mainstream housing outcome as quickly as possible;
- Time spent in any form of temporary accommodation reduced to a minimum, with fewer transitions the better; and
- When temporary accommodation is needed, the optimum type is mainstream, furnished and within a community.

'Housing First', refers to a specific model within a Rapid Rehousing approach, placing vulnerable homeless people in permanent tenancies from the outset with a comprehensive package of support, as opposed to homeless people starting in temporary accommodation and gradually progressing through services towards independent living. For homeless people with multiple needs beyond housing, Housing First:

- Comprises the first response for people with complex needs and facing multiple disadvantages;
- Recognises a safe and secure home as the best base for recovery and offers personalised, open-ended flexible support for people to end their experience of homelessness and address wider needs;
- Separates the provision of housing and support, offers choice and control to tenants and works to the principles of harm reduction; and
- Advocates the use of highly specialist provision within small, shared, supported and trauma informed accommodation, if mainstream housing is not possible or preferable.

Following submission of the RRTP to the Scottish Government, Plans will be assessed and evaluated and a resource allocation determined for individual authorities to assist delivery. Investment of £21m was announced in June 2018, to support a move towards Rapid Rehousing as part of the £50m Ending Homelessness Together Fund.

The new planning and implementation framework to support local authorities and partners to transition to a Rapid Rehousing approach comprises three elements: *'Scotland's Transition to Rapid Rehousing: Market Area Analysis, Legislative and Culture Review'* published in June 2018, to assist local authorities and key partners to develop RRTPs; *Scotland's Transition to Rapid Rehousing: Guidance for Local Authorities and Partners (2018)* and a *Rapid Rehousing Transition Tool*, consisting of a detailed excel spreadsheet to enable Plans to be consistently calculated and costed<sup>3</sup>.

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<sup>3</sup> <http://www.ghn.org.uk/rapid-rehousing-transition-plan/>

In November 2018, 'Ending Homelessness Together: High Level Action Plan'<sup>4</sup> was published by the Scottish Government, setting out a national vision for homelessness:

**National Homelessness Vision:**

**'Everyone has a home that meets their needs' and 'Homelessness is ended'**

- Homelessness is only ever rare, brief and non-recurrent due to effective prevention and rapid response when people have become homeless or are at risk of homelessness
- Homelessness is not caused by policies that impact on the people of Scotland
- Where temporary accommodation is required it is for emergency or very specific reasons only; it is of a high standard and it is fit for the specific purpose required
- Nobody sleeps rough

The Action Plan states 'To end homelessness together we will **ensure a person-centred approach** is embedded across strategy and services; **increase our focus on preventing homelessness** from happening in the first place; **prioritise settled homes for all**; **increase investment to respond quickly** and effectively whenever homelessness happens; and **join up planning and resources** to tackle and prevent homelessness.

This RRTP takes cognisance of the steps set out in the Action Plan to achieve the vision and corresponds with this at a local level.

### **1.3 Alignment with Local Strategies and Plans**

East Lothian Council is actively engaging with the Scottish Government in respect of the Housing Beyond 2021 agenda, working towards the national ambition 'everyone to have a home that is warm, affordable and accessible; to support our most disadvantaged communities and promote wellbeing'. This is reflected in key local strategies and plans.

The RRTP aligns with the wider priorities of the **East Lothian Local Outcome Improvement Plan 2017-27** and the **East Lothian Council Plan 2017-22**, in particular the overarching objective of the Council Plan '*reducing inequalities within and across our communities*' and the strategic goal to '*improve the life chances of the most vulnerable people in our society*'.

The **Local Housing Strategy (LHS)** sets out the strategic approach, priorities and plans for the delivery of housing and related services across a local authority area. This RRTP links to and sits within the wider context of the East Lothian LHS 2018-23, which outlines a vision for '*Healthy, sustainable homes in vibrant communities, that meet increasing levels of need, reduce inequalities and improve wellbeing across all stages of people's lives*'. This RRTP builds on priority outcome 3 of the East Lothian LHS 2018-23 '*Homelessness is prevented as far as possible, with appropriate support in place to promote positive health outcomes and tenancy sustainment*'.

The East Lothian LHS 2018-23 was published recently (June 2018), which is timely in ensuring strategic fit with the RRTP. The LHS states:

*'East Lothian Council recognises the current drive towards 'Housing First' models and the need to provide direct access to settled accommodation as quickly as possible, with support... We will explore*

<sup>4</sup> <https://www.gov.scot/publications/ending-homelessness-together-high-level-action-plan/>



*the Housing First approach further and continue to work with the Scottish Government in the development of a Rapid Rehousing Framework’.*

Enhancing the LHS, the requirement to prepare a RRTP provides a further opportunity to re-assess in more detail how well the local housing system is functioning for homeless and potentially homeless households and enable improved outcomes. The RRTP will be published as a formal supplementary document of the LHS and progress towards the RRTP vision and priority outcomes will form a critical component of the LHS annual review.

The **Strategic Housing Investment Plan (SHIP)** specifies the strategic investment priorities for affordable housing over a five year period to achieve the outcomes set out in the LHS and identify resources required to deliver these priorities. A draft East Lothian SHIP for the period 2019/20 - 2023/24 is currently being consulted on and will be published in spring 2019. Following assessment and evaluation of this initial RRTP, a resource allocation will be determined for East Lothian and implementation of the Plan will commence thereafter. It is anticipated that the RRTP will be an integral part of the SHIP in future, with the RRTP reviewed annually as part of the SHIP process.

At the time of preparing this RRTP, work is ongoing in parallel to develop a new East Lothian **Health and Social Care Strategic Plan** for the period 2019-22, with a corresponding **Housing Contribution Statement**. There is an in-principle agreement with Health and Social Care partners that the final documents will reinforce and support the vision of the East Lothian RRTP.

**Table 1.1: Strategic Documents Aligning with the RRTP**

<b>Strategy / Plan</b>	<b>Purpose</b>	<b>Relationship to RRTP</b>
East Lothian Local Outcomes Improvement Plan (LOIP) 2017-27	Overarching plan setting out how Community Planning Partners will contribute to the 16 national outcomes; local needs & priorities.	Provides strategic direction for RRTP
East Lothian Council Plan 2017-22	Supports LOIP priorities / sets out how the Council will deliver local priorities.	Provides strategic direction for RRTP
Area Partnership plans	Presents a shared vision for local areas, reflecting local community aspirations.	Informs the RRTP at local level
East Lothian Council Equalities Plan 2017-21	Sets out how the Council will ensure people are not discriminated against.	Provides a strategic equalities framework for the RRTP
Strategic Housing Investment Plan (SHIP) 2019/20 – 2023/24	Sets out housing investment priorities for a five-year period. It demonstrates how affordable housing priorities will be delivered / identifies resources to deliver.	Provides a delivery framework for affordable housing, critical to the RRTP
Health & Social Care Strategic Plan 2019-22	Sets out changes / improvements in relation to health & social care.	Provides strategic direction / aligns with the RRTP in respect of housing support
Housing Contribution Statement 2019-22	Sets out the role of housing providers to achieve health & social care outcomes.	Acts as a bridge between LHS & Strategic Plan providing strategic direction / aligning with RRTP in respect of housing support
East Lothian Children & Young People’s Plan 2017-20	Seeks to ensure children & young people are integrated into the community.	Informs the RRTP

Community Justice Local Outcome Improvement Plan 2017-20	Seeks to deliver improvements in crime reduction.	Informs the RRTP
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Source: East Lothian Council, 2018

## 1.4 Developing the Rapid Rehousing Transition Plan

Statutory public sector equality duties set out in the UK Government’s Equality Act 2010, require involvement, consultation and engagement with as wide a range of local people as possible. Accordingly, East Lothian Council has prepared this Plan through extensive discussion with partners i.e. the East Lothian Health and Social Care Partnership; housing providers; support providers; East Lothian Tenants and Residents Panel and voluntary sector organisations.

A large scale event was held in November 2018, to consult on a wider vision for Rapid Rehousing in 2024 and the steps we all need to take to get there. Partners were invited to consider and input to the development of a vision; priority outcomes; actions; Integrated Impact Assessment and how we can best work together over the next five years to implement the RRTP and achieve the vision. Partners were also asked to reflect on how we can work towards Rapid Rehousing within the wider context of future change and uncertainty in respect of the ‘*Housing Beyond 2021*’ agenda. A number of smaller meetings were also held with key partners during autumn / winter 2018 to inform the development of the RRTP.

## 1.5 Vision and Priority Outcomes

It is recognised that a substantial shift in culture will be required to make the transition to a Rapid Rehousing approach. Ultimately, the goal will be to remove the concept of ‘homelessness’ in East Lothian altogether, although it is recognised this will not be achievable in a five year period, particularly within a context of substantive legislative and policy change. Over the period to 2024, we aim to make a realistic and meaningful impact in working towards more ambitious long-term aspirations to end homelessness across the county. With this in mind and taking account of the key issues and challenges identified, changing strategic planning framework and local context, the strategic vision in East Lothian is that by 2024:

***‘A fresh, new partnership arrangement enables a holistic approach to housing options, ensuring everyone has a home that meets their needs and a commitment to work towards ending homelessness in the longer term’.***

Five priority outcomes are identified to inform this vision:

**Priority Outcome 1: Homelessness is prevented as far as possible**

**Priority Outcome 2: Access to existing housing for homeless households is improved across all tenures**

**Priority Outcome 3: The homelessness system is more efficient and effective**

**Priority Outcome 4: Access to support is improved for homeless people with complex needs, where appropriate.**

**Priority Outcome 5: Supply of new permanent /settled housing is increased across all tenures**

# SECTION 2

Housing Market



## 2 Local Housing Market

This section of the RRTP provides commentary on the local housing market as evidenced in detail in the Housing Need and Demand Assessment (HNDA) and Local Housing Strategy (LHS), placing the homelessness position in context<sup>5</sup>.

### 2.1 Housing Need and Demand

A Housing Need and Demand Assessment (HNDA) estimates the future number of additional housing units required to meet existing and future housing need and demand. East Lothian is part of the South-East Scotland housing market area and accordingly, a HNDA is prepared to cover the South-East Scotland Strategic Development Planning Area or 'SESplan' area.

The HNDA provides a statistical estimate of how much additional housing would be required to meet all future housing need and demand. The most recent HNDA (SESplan HNDA2) evidences a need for 553 additional units of housing each year in East Lothian, over a twenty year period. This equates to 67% affordable housing and 33% market housing.

	<b>Market</b>	<b>Affordable</b>	<b>Total</b>
<b>City of Edinburgh</b>	1,496	2,412	3,908
<b>East Lothian</b>	183	370	553
<b>Fife</b>	347	457	804
<b>Midlothian</b>	117	325	442
<b>Scottish Borders</b>	113	165	278
<b>West Lothian</b>	250	380	630
<b>Total</b>	2,506	4,109	6,615
<b>%</b>	37.9	62.1	-

Source: SESplan HNDA2, March 2015

**Housing Need and Demand Balance:** The most recent Housing Need and Demand Assessment estimates 370 affordable units are required per annum, from 2012-32.

The Housing Supply Target (HST) builds on the HNDA, providing an estimate of how much additional housing can actually be delivered in practice. The HNDA is the starting point for setting a HST, with further consideration given to those factors which may have a material impact on the pace and scale of housing delivery including:

- Economic factors which may impact upon demand and supply
- Capacity within the construction sector
- The potential interdependency between delivery of market and affordable housing
- Availability of resources
- Likely pace and scale of delivery based on recent development levels
- Planned demolitions, new and replacement housing and housing brought back into effective use

<sup>5</sup> The full SESplan HNDA2 can be accessed here at: <http://sesplan.gov.uk/housing-need-and-demand-assessment/30/>

The full East Lothian LHS 2018-23 and supporting documents can be accessed at: [https://www.eastlothian.gov.uk/downloads/download/13022/local\\_housing\\_strategy\\_2018-23\\_papers](https://www.eastlothian.gov.uk/downloads/download/13022/local_housing_strategy_2018-23_papers)

Following Guidance<sup>6</sup>, a detailed process was undertaken by the SESplan authorities in 2016, to translate the HNDA into HSTs at local authority level. An affordable HST of 189 units per annum (36%) and a market HST of 330 units per annum (64%) were determined for East Lothian in partnership with SESplan authorities<sup>7</sup>, leading to a combined target of 519 units, for 2018-30<sup>8</sup>.

	Market	Affordable	Total
City of Edinburgh	1,220	1,200	2,420
East Lothian	330	189	519
Fife	605	262	867
Midlothian	369	165	534
Scottish Borders	220	128	248
West Lothian	333	300	633
<b>Total</b>	<b>3,077</b>	<b>2,244</b>	<b>5,321</b>

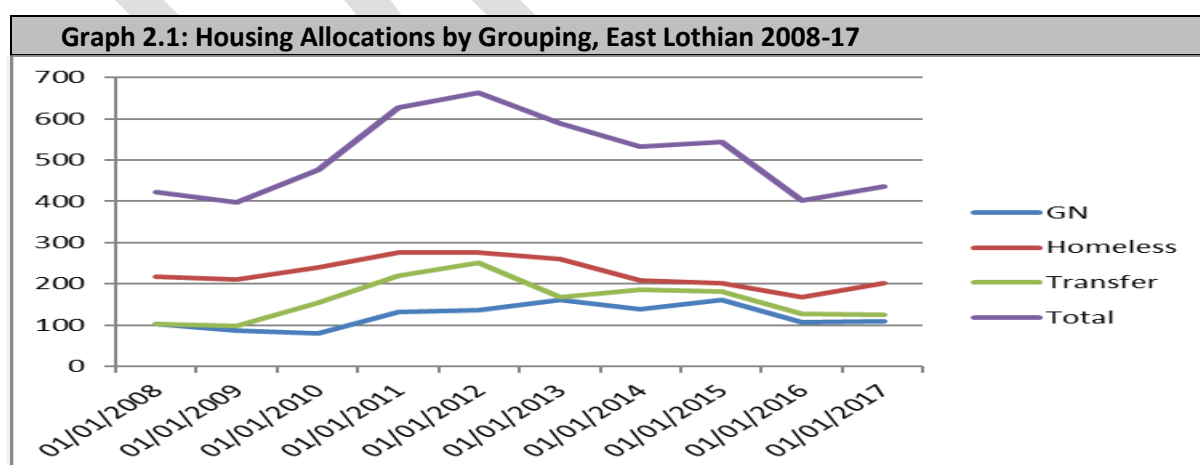
Source: SESplan, unpublished 2016

**Need for Affordable Housing as per Housing Supply Target:** The affordable HST for East Lothian is 189 units per annum from 2018-30.

## 2.2 Local Housing Pressure

While the number of households on the Council’s housing list has fallen in recent years, 3,700 households remain on the list<sup>9</sup>. The number of Council homes becoming available to let has been declining generally since a peak of 664 in 2012, despite significant new build activity and other policy interventions. 436 allocations were made in 2016/17 including 201 (46%) to homeless households and 493 allocations were made in 2017/18, including 237 (48%) to homelessness.

Graph 2.1 shows the total number of allocations made each year and highlights the proportion of these made to general needs households, homeless households and transfers. A higher proportion of allocations is made to homeless households than to general needs households or transfers.



Source: East Lothian Council, 2017

<sup>6</sup> Local Housing Strategy Guidance 2014

<sup>7</sup> The HNDA identified three alternative futures based on different demographic and economic assumptions, each showing numerical estimates of need and demand. Following analysis, SESplan concluded the most likely outcome will fall between ‘steady recovery’ and ‘wealth distribution’ alternative futures. The former is based on low economic growth future with low migration. The latter is based on a higher level of economic growth than steady recovery, with higher migration, reducing income inequalities and wider distribution of wealth across the region. Wealth distribution estimates have been used to inform HSTs.

<sup>8</sup> Formally approved by East Lothian Council on 23 August 2017

<sup>9</sup> 31 November 2018

Table 2.3 shows the number of homeless households, to whom the Council has a full re-housing duty at 30 November 2018 compared with total allocations in 2017/18. It is clear that homelessness need for housing is high, relative to available supply, particularly in relation to one / two apt properties.

<b>Table 2.3: Homeless Households on Housing List, 30 November 2018</b>		
	<b>Total allocations 2017/18</b>	<b>Homeless applicants on housing list</b>
<b>1-2 apt</b>	100	287
<b>1-2 apt sheltered / amenity</b>	70	7
<b>3 apt</b>	221	195
<b>4-5 apt</b>	102	62
<b>Total</b>	493	551

Source: East Lothian Council, November 2018

**Extent of Housing Pressure:** Approximately 3,700 households are currently on the housing list, including 551 homeless applicants. 493 allocations were made in 2017/18 including 237 (48%) to homeless households.

## 2.3 Housing Affordability

Expensive private housing in East Lothian, combined with limitations on borrowing, can make it difficult to access owner occupation, particularly for first time buyers. Comparing the ratio of house prices with income levels across the South-East Scotland (SESplan) area provides a key indicator of the relative affordability of owner-occupation. Assessing the ratio of lower quartile house prices to lower quartile earnings enables consideration of whether households with the lowest incomes can afford lower cost housing. The lower quartile ratio across the SESplan area is 7.50 compared with 6.72 nationally. Lower quartile ratios are higher in East Lothian (8.64), followed by City of Edinburgh (8.34) and lowest in Fife (5.70). This means that the average house price paid by a first-time buyer is less affordable for a person on a low to average income in East Lothian than in other areas.

<b>Table 2.4: Ratio of House Prices to Income, SESplan Authority Areas (£000), 2013</b>				
	<b>Lower quartile</b>	<b>Lower quartile house prices</b>	<b>Median</b>	<b>Upper quartile</b>
<b>East Lothian</b>	8.64	123,000	5.76	4.92
<b>City of Edinburgh</b>	8.34	127,314	5.90	5.30
<b>Fife<sup>10</sup></b>	5.70	76,250	4.48	3.79
<b>Midlothian</b>	8.28	115,000	5.34	4.41
<b>Scottish Borders</b>	7.61	97,500	5.98	5.06
<b>West Lothian</b>	6.40	92,500	4.26	3.65
<b>SESplan</b>	7.50	105,261	5.29	4.52
<b>Scotland</b>	6.72	90,000	5.12	4.33

Source: SESplan HNDA2, 2015

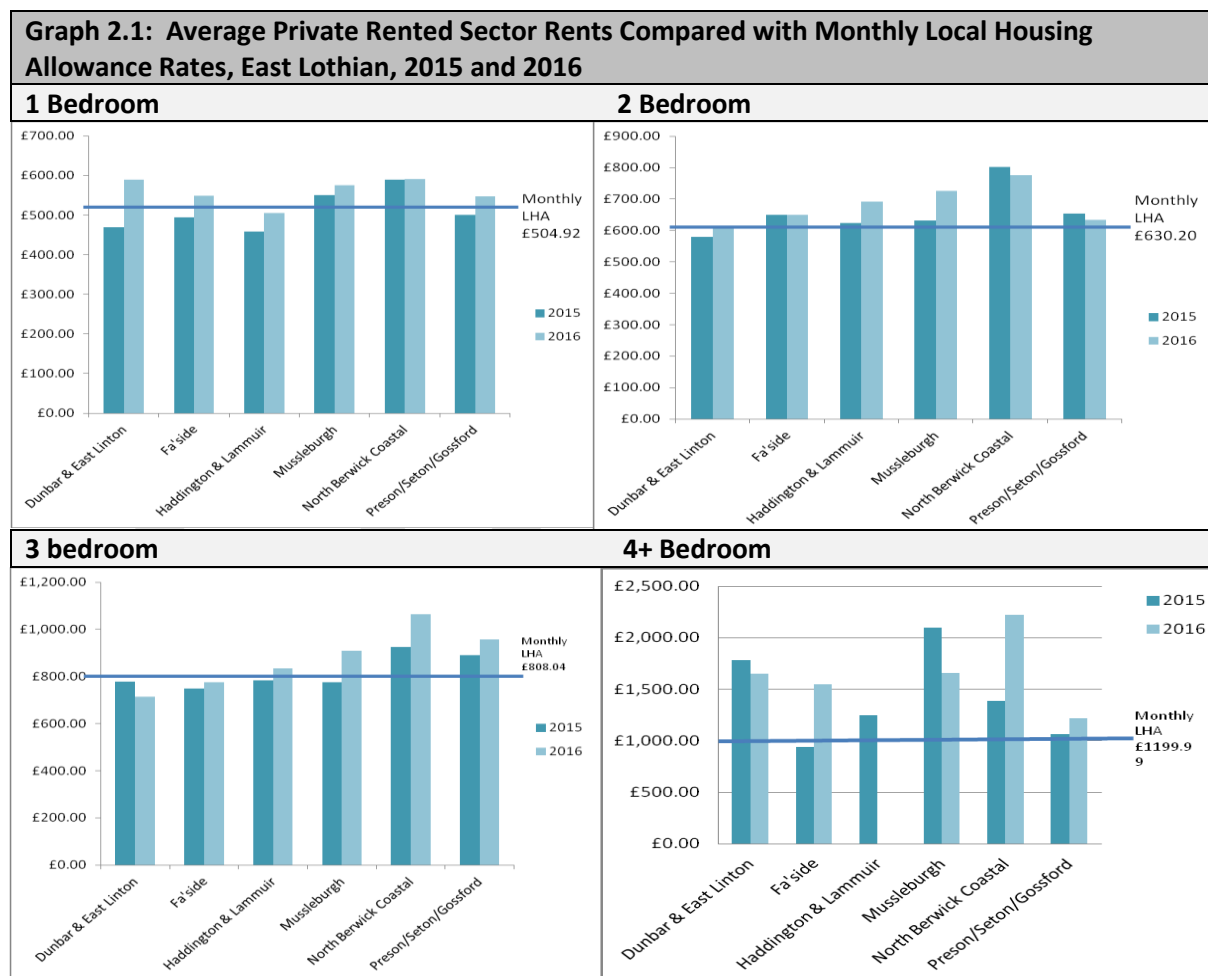
In respect of private rented housing, landlords with one or two properties provide most lets and 44% of accommodation available for rent consists of two-bedroom properties. There is a shortage of one-bedroom properties in particular, with demand far outstripping supply. With major difficulties accessing mortgage finance & shortages in affordable housing, the private rented sector has become

<sup>10</sup> For SESplan purposes in accordance with defined boundaries, 'Fife' refers to the southern part of the administrative area of Fife.

a permanent option for low to medium income households who cannot afford to buy & cannot access social rented housing over the short to medium term.

The difference between rent levels and Local Housing Allowance (LHA) rates provide an indication of affordability in the private rented sector. LHA is Housing Benefit for people renting a home from a private landlord. People under 35 and single usually only receive the shared room rate of LHA, even when living in self-contained accommodation. If rent is higher than LHA, the tenant must pay the difference or find alternative accommodation. Changes to LHA have resulted in additional challenges for those in the private rented sector. The LHA rate was reduced as part of the coalition government welfare reform changes, to the 30<sup>th</sup> percentile of market rents and has remained frozen since 2015.

Graph 2.1 shows average rents in East Lothian compared to LHA rates. In 2015, average rents for one bed properties were below LHA in all areas excluding Musselburgh and North Berwick Coastal, however in 2016 only properties in Haddington and Lammermuir remained below LHA rate. Rents were above LHA for two bed properties in all areas of East Lothian in 2016. Three bed properties were only affordable in Dunbar & East Linton and Fa'side and average rents for four bed properties were not below LHA rates in any area. It is clear there is a lack of private rented accommodation in East Lothian below LHA rates. With high numbers of households in the sector, either through choice or constraint, this has implications for homelessness, housing need and poverty across the county.



Source: East Lothian Council 2017

Having average rents above LHA levels can place a significant strain on individual households, leaving many seriously exposed and with limited means of meeting shortfalls in rent. The impact on

individual private sector landlords of one or more of their tenants falling into arrears may be substantial, especially where properties are let with a mortgage in place and as such failure of tenants to pay rent may influence the ability of a landlord to maintain their own mortgage payments<sup>11</sup>. This can lead to private landlords taking steps to protect their income streams, including taking eviction action against tenants in rent arrears and seeking to avoid taking on tenants in receipt of benefits to meet their housing costs. This impacts upon the housing list, increasing demand for social rented housing and affects homelessness, with ‘action by landlord’ typically one of the most common reasons for homelessness at around 18%.

A recent report shows the most limited market in Scotland is the Lothian housing market rental area (including East Lothian) one bedroom rate, with fewer than 5% of advertised tenancies accessible at LHA rate. The monthly shortfall between LHA and real 30<sup>th</sup> percentile is set out in Table 2.5.

Property size	Shared	1 bed	2 bed	3 bed	4+ bed
<b>Shortfall (£)</b>	9.98	23.82	32.93	32.16	33.76

Source: Scottish Government 2018<sup>12</sup>

**Average private rented sector monthly costs relative to LHA:** Average rents are well in excess of LHA rates in respect of almost all property sizes, in almost all areas of the county<sup>13</sup>.

While it is clear that privately owned and privately rented housing is generally expensive in East Lothian compared with the national picture, social rents are relatively inexpensive in comparison. Average weekly Council rents are £62.47 in 2017/18, compared with £76.20 nationally<sup>14</sup> and average RSL rents are £85.58 compared to £74.44 nationally<sup>15</sup>. Relatively low Council rents in comparison with higher costs for other tenures can result in Council housing being the preferred option for some households, restricting housing options.

## 2.4 Affordable Housing Completions

During the period 2012/13 to 2016/17 inclusive, there were 628 completions of affordable housing including 510 social rent; 44 mid-market and 74 low cost home ownership. During 2017/18, there were 292 completions comprising 205 social rent; 60 mid-market and 27 low cost home ownership.

East Lothian Council has produced a Strategic Housing Investment Plan (SHIP) for the period 2019/20 to 2023/24. The SHIP sets out East Lothian’s housing investment aspirations and priorities for the next five years. It contributes towards achieving the outcomes set out in the LHS and demonstrates how investment in affordable housing will be targeted to meet these objectives. The focus for the SHIP is the delivery of social rented housing, however it also includes a range of other affordable tenures i.e. homes for mid-market rent and different forms of low cost home ownership. The SHIP shows potential site starts of 1,454 new affordable homes with 1,567 completions over the period of

<sup>11</sup> <https://www.publicfinance.co.uk/news/2018/05/welfare-reform-pushes-rent-arrears-scottish-tenants>

<sup>12</sup>

[file:///C:/Users/sandn/AppData/Local/Packages/Microsoft.MicrosoftEdge\\_8wekyb3d8bbwe/TempState/Downloads/Annual%20Report%20follow%20up%20paper%20-%20Housing%20and%20Social%20Security%20\(1\).pdf](file:///C:/Users/sandn/AppData/Local/Packages/Microsoft.MicrosoftEdge_8wekyb3d8bbwe/TempState/Downloads/Annual%20Report%20follow%20up%20paper%20-%20Housing%20and%20Social%20Security%20(1).pdf)

<sup>13</sup> With the exception of one bed properties in Haddington and three bed properties in Dunbar & East Linton and Fa’side (2016 figures).

<sup>14</sup> Source: Scotland’s Housing Network

<sup>15</sup> ARC data



the Plan (excluding completions of 159 unsubsidised units), however this is aspirational and dependent on a range of factors i.e. infrastructure constraints; reliance on delivery via the private sector and ground conditions. The Council projects £57.871m of subsidy will be required for a programme of 1,070 units which are anticipated to be deliverable on the ground<sup>16</sup>. Where there is the ability to develop additional units over and above these 'deliverable' sites, a further £27.203m to develop a total of 1,567 completed units will be required (excluding 159 unsubsidised units). The Scottish Government, Council and partners will collectively look at those projects that can deliver over this period and allocate resources in the best way to maximise delivery and funding. Table 2.6 sets out site starts and completions that the Council considers are deliverable over the five year period, with a breakdown of completions by tenure in Table 2.7.

**Table 2.6: Affordable Housing Site Starts and Completions (Deliverable), East Lothian, 2019/20 – 2023/24**

	Site starts	Completions	Unsubsidised starts	Unsubsidised completions
<b>2019/20</b>	299	172	137	107
<b>2020/21</b>	334	367	10	52
<b>2021/22</b>	100	351	0	0
<b>2022/23</b>	98	112	0	0
<b>2023/24</b>	35	68	0	0
<b>Total</b>	866	1,070	147	159

Source: East Lothian Council 2018

**Table 2.7: Affordable Housing Site Completions by Tenure (Deliverable), East Lothian, 2019/20 – 2023/24**

	Housing Association (Rent)	Local Authority (Rent)	Mid-Market Rent	Low Cost Home Ownership	Total
<b>2019/20</b>	48	97	27	0	172
<b>2020/21</b>	163	124	80	0	367
<b>2021/22</b>	106	175	50	20	351
<b>2022/23</b>	52	50	10	0	112
<b>2023/24</b>	25	43	0	0	68
<b>Total</b>	394	489	167	20	1,070

Table 2.8 sets out an aspirational overview of site starts and completions, should further funding be available / development constraints be lifted.

**Table 2.8: Affordable Housing Site Starts and Completions (Aspirational), East Lothian, 2019/20 – 2023/24**

	Site starts	Completions	Unsubsidised starts	Unsubsidised completions
<b>2019/20</b>	327	172	137	107
<b>2020/21</b>	469	395	10	52
<b>2021/22</b>	308	505	0	0
<b>2022/23</b>	235	332	0	0
<b>2023/24</b>	115	163	0	0
<b>Total</b>	1454	1567	147	159

Source: East Lothian Council 2018

<sup>16</sup> The SHIP refers to those projects which are further advanced in respect of deliverability as 'high priority projects'.

The SHIP does not include new supply via open market acquisitions, although required subsidy is incorporated. Open market acquisitions refers to the Council purchasing properties on the open market, bringing these up to standard and using as Council social rented affordable housing, with a significant proportion provided for homeless households. During 2017/18, the Council secured subsidy of £400k per annum for 10 open market acquisitions. In addition, 12 off the shelf purchases will be acquired, for which £50k subsidy has been secured per property. During the period 2019/20-2023/24, the Council is seeking to purchase 10 open market acquisitions per annum, using £400k subsidy per annum.

While the East Lothian Council SHIP includes the above resource allocation and covers the period to 2023/24, there is currently uncertainty in respect of subsidy levels beyond 2021. The Scottish Government anticipates changing the way public money is spent to support housing services and delivery, including consideration of new sources of funding for, and innovative ways of building homes. The current level of spend nationally is becoming challenging to sustain and a further 50,000 affordable homes target for the next Parliament would cost in the region of £4 billion, with this level of investment still not meeting identified levels of housing need across Scotland. In accordance with this, the Scottish Government has launched a formal discussion on the creation of a vision for housing for 2040, 'Housing Beyond 2021', which will extend to formal consultation in Spring 2019. Key decisions must be reached on future funding as part of the Housing Beyond 2021 agenda, which could have a considerable impact upon whether the aspirations of this RRTP are realised in practice. The delivery of more affordable homes is critical to meeting high levels of estimated housing need in East Lothian, including homelessness pressures and the Council will continue to work closely with the Scottish Government over the coming months to explore innovative financial models to maximise the delivery of social rent and other intermediate tenures.

## **2.5 Financial Innovation – Affordable Housing Supply**

- **City Region Deal**

The Council is part of the Regional Housing Programme within the East of Scotland and is working hard to collaborate around the successful delivery of 7 significant regional sites including Greater Blindwells in East Lothian. The focus is on delivery of the following key outcomes:

- Accelerated delivery of 7 strategic housing sites with capacity for over 40,000 homes;
- Housing infrastructure delivery and funding solutions;
- Land to develop a robust affordable housing pipeline;
- An affordable housing programme (with a commitment to maximise certainty over future public funding levels for the regional housing programme);
- A pipeline of mid-market rent and low cost market rent homes;
- Accelerated delivery through innovation and supporting regional SME growth;
- Jobs, learning and progression opportunities, meeting current and future industry skills requirements;
- Supporting the development of a consistent all partner approach to community benefits; and
- A strengthened relationship between public, private, and third sector stakeholders.

- **Alternative Funding Models**

The Council is reliant on its land use planning policy for affordable housing to deliver land on which to provide affordable housing. As part of this policy, all new housing developments of 5 or more units must make an affordable housing contribution of 25%. The policy seeks to deliver a broad tenure mix of 80% social rent and 20% other tenures. The policy sets out a range of affordable

housing 'definitions' which are acceptable and which comply with national planning policy, ranging from social rent to unsubsidised housing for sale.

The Council is working innovatively to identify alternative funding models and has recently agreed a model for a development whereby the building of the homes will be funded by a pension fund and leased to an SPV set up by the Council over a period, with the option for the units to be sold to the Council for £1 each at the end of the 40 year period.

Delivering models such as this without subsidy is an attractive proposition. Moving forward, given the extent of housing growth levels, not all of the affordable units which we will seek to deliver or indeed see delivered, can be done so through subsidy and innovation in funding models should be encouraged. This model, or similar models could allow subsidy to be targeted to deliver social rented housing in areas where the greatest pressure exists.

**Projected completions of affordable housing to 2023/24:** 1,070 completions are considered likely to be delivered over the period 2023/24. Subsidy levels for affordable housing are yet to be agreed beyond 2021.

## 2.6 Empty Homes

It is estimated there are 870 empty homes in East Lothian, with around 375 of these consisting of long-term empty homes (vacant for six-months or more). East Lothian has a lower proportion of empty homes (1.9%) compared to the national average of 3.1% in 2016. East Lothian's housing stock also includes 1.1% second homes, just above the national average of 1.0% in 2016.

Research commenced mid-2018, to improve knowledge and understanding around the reasons for empty homes and how home owners can be supported to bring empty homes back into use. The findings of this research will inform a strategic approach to tackling empty homes and delivery priorities going forward, with consideration given to how empty homes brought back into housing stock may be used for homelessness prevention and / or to accommodate homeless households.



# SECTION 3

Homelessness Context



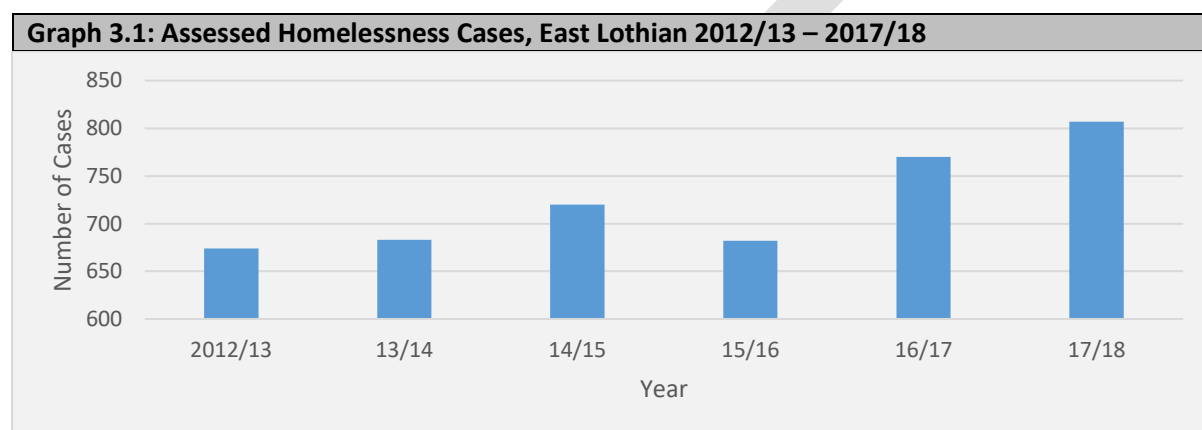
# 3 Homelessness Context

## 3.1 Homelessness Position

This section of the RRTP sets out evidence on the current position, key issues and challenges in respect of homelessness in East Lothian.

- **Applications / Assessments**

Homeless applications have been rising in East Lothian since 2015/16, with 807 households assessed as homeless during 2017/18.



Source: East Lothian Council 2018

The main reasons for homelessness in East Lothian are ‘asked to leave’ (comprising the main reason at 39%); ‘relationship breakdown’; ‘domestic abuse’ and ‘action by landlord’, which together account for around 75% of homeless applications.

‘Asked to leave’ predominantly relates to young people asked to leave the parental home and East Lothian has the 6<sup>th</sup> highest level of youth homelessness nationally at 15.7% compared to 11.7% across Scotland.

**Table 3.1: Youth Homelessness, East Lothian , 2016/17-2017/18**

	16-24 population	Youth homelessness 2017-18	Rate of youth homelessness per 1,000	Change 2016/17-2017/18	
				No.	%
<b>E. Lothian</b>	10,429	164	15.7	-43	-21
<b>Scotland</b>	593,361	6,954	11.7	-605	-8

Source: The Scottish Government, 2018

Domestic abuse is a major cause of homelessness in East Lothian. Around 950 incidents of domestic abuse have been recorded by the police per annum since 2014. Between April and September 2018, police officers in East Lothian attended 576 domestic related incidents – 21.5% more than the same period in 2017, which is concerning. Women’s Aid East and Midlothian received 140 refuge requests and accommodated 43 women and 41 children in supported accommodation in 2016/17 across East and Midlothian, with refuge requests increasing by 31% from the previous year. Average waiting time for refuge accommodation was 90 days. In 2019 the Domestic Abuse (Scotland) Act 2018 will be brought into force, criminalising abusive, coercive and controlling behaviours.

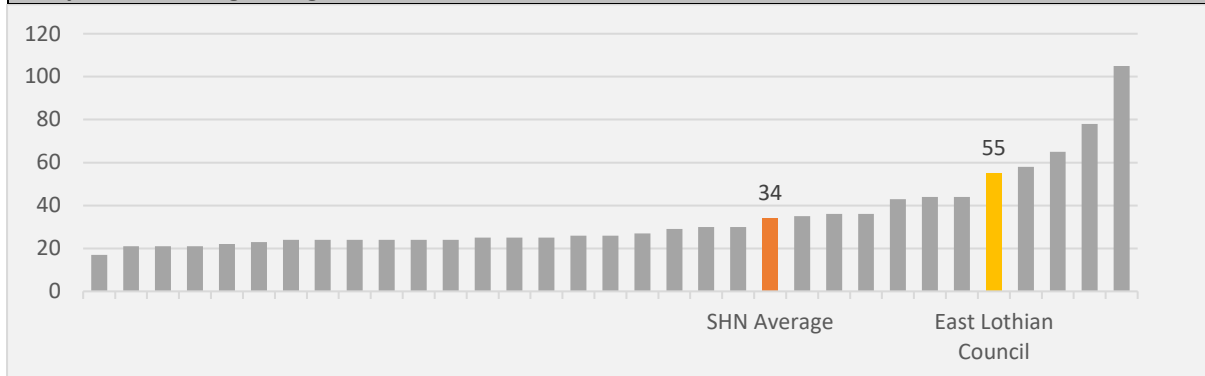
East Lothian Council had a duty to find settled accommodation for 573 households assessed as homeless in 2017/18 and at 1 April 2018, there were 593 open homelessness cases, with a duty to find settled accommodation.

- **Length of Time to Complete Cases**

Approximately 79% of assessments are completed within 28 days.

Recent analysis shows that East Lothian Council takes an average of 55 weeks to close a case, compared to 34 weeks nationally.

**Graph 3.2: Average Length of Case for Cases Closed, East Lothian, 2017/18**

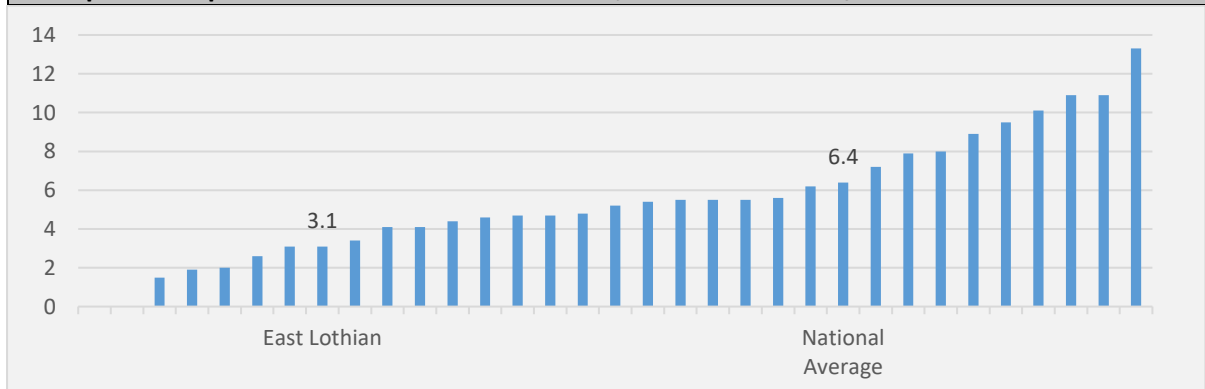


Source: Scotland’s Housing Network, 2018

- **Repeat Homelessness**

East Lothian has a low proportion of repeat homelessness at 3.1% compared with the national average of 6.4%. This reflects homelessness as predominantly a structural issue in East Lothian, with the majority of households simply requiring accommodation.

**Graph 3.3: Repeat Homelessness Presentations, East Lothian 2017/18**



Source: Scotland’s Housing Network, 2018

- **Rough Sleeping**

The number of applications where a household member has reported sleeping rough the night before applying for assistance is 15 in East Lothian (2017/18). This equates to 1.9% of applications, a slight decrease from 2.1% the previous year. Nationally, the average figure is 4%.

- **Severe and Multiple Disadvantage**

The term ‘severe and multiple disadvantage’ (SMD) is used to signify the problems faced by adults involved in the homelessness, substance misuse and criminal justice systems, with poverty an almost universal and mental-ill health a common complicating factor. Recent national research suggests that there are 49 households experiencing severe and multiple disadvantage in East Lothian<sup>17</sup>.

**Total homelessness assessments: 807**

**Total new assessments in 2017/18 where the local authority has a duty to find settled accommodation: 573**

**Open homelessness cases at 31 March 2018: 593**

**Average length of case in 2017/18: 55 days**

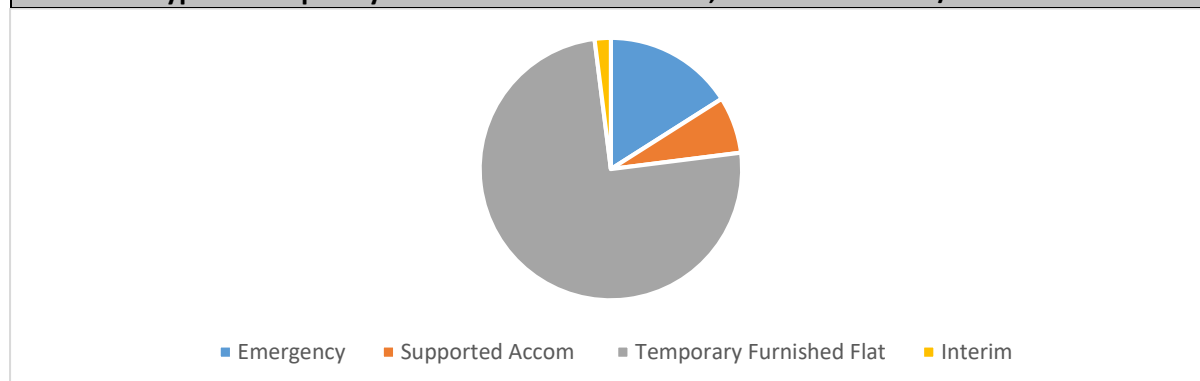
**Total households sleeping rough in 2017/18: 15**

**Prevalence of severe and multiple disadvantage: 49 households**

### 3.2 Temporary Accommodation

East Lothian Council has access to a total of 444 temporary accommodation units, with a breakdown set out in Chart 3.1. Temporary furnished flats are used predominantly (332 units, equating to 75%) although heavy reliance remains also on emergency B&B accommodation (70 places, equating to 16%). There are 32 supported accommodation places and 10 interim places comprising 7% and 2% respectively. 50% of temporary accommodation stock is provided by East Lothian Council, 30% is provided through the private sector leasing scheme, 10% is provided by local Housing Associations and the remaining 10% is provided by other housing providers as supported accommodation. The vast majority of temporary accommodation is located in the west of the county (Musselburgh, Prestonpans and Tranent).

**Chart 3.1: Type of Temporary Accommodation Provision, East Lothian 2017/18**



Source: East Lothian Council 2018

The Council has increased the provision of temporary accommodation stock by around 45% since 2012, however despite this increase, the level of demand for temporary accommodation is such that the Council remains dependent on B&B. A total of 404 households were living in temporary accommodation at 31 March 2018, including approximately 70 in B&B.

<sup>17</sup> Heriot Watt University: Developing a Profile of Severe and Multiple Disadvantage in Scotland – Working Paper, Homelessness Data Sources (draft v2, 17 April 2018)



It is evident from Table 3.2 that length of stay in temporary accommodation has increased each year since 2012/13. This is for the most part, due to structural pressures within the system i.e. lack of affordable move-on accommodation, low levels of allocations generally and difficulties in relation to accessing the private rented sector. The upwards trend also reflects the changing legislative context, with the Council being unable to discharge its legal duty until settled housing has been secured, for an increasing number of homeless people assessed as being unintentionally homeless. A recent report commissioned by the Social Bite on behalf of the Homelessness and Rough Sleeping Action Group states:

*‘The very long lengths of stay in East Lothian are due to the local housing market, specifically high demand for and low turnover within social housing, a relatively small, expensive and high demand private rented sector and the low level of local authority rents which mean those in temporary accommodation are often unwilling to consider other housing options... East Lothian is also the highest user of social sector temporary accommodation in which stays tend to be longer’<sup>18</sup>.*

Year	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18
<b>Total applications</b>	1,193	774	674	683	720	661	770	807
<b>Average stay</b>	199	212	176	255	260	334	374	377

Source: East Lothian Council, 2018

Length of stay by type of accommodation is set out in Table 3.3. A recent report states B&B stays are 36 days on average nationally, with the highest levels of 70 days recorded in East Lothian<sup>19</sup>.

Accommodation Type	No. Days
Local authority dwelling	416
Housing association dwelling	455
Hostel accommodation	226
B&B	70
Private sector leasing	470
Other	497

Source: ARC Return, 2018

Table 3.4 shows stays in temporary accommodation are particularly lengthy for single adults.

Household Type	2014	2015	2016	2017	Total	Turnover of stock excluding 2+ years
<b>All adults</b>	193.6	295.9	335.1	321.8	287.7	1.27
<b>Households with children</b>	199.5	301.6	312.5	322.6	281.4	1.30

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<b>Single adults</b>	321.3	388.7	423.6	445.3	390.8	0.93
<b>Total</b>	260.7	341.6	373.4	380.5	336.6	1.08

Source: East Lothian Council, 2018

More in-depth analysis shows the length of stay in temporary accommodation excluding / including households in temporary accommodation for over one year. In 2016/17, 121 households were in temporary accommodation for over one year, of which 50 had been in temporary accommodation for over two years.

<b>Table 3.5: Average Length of Stay in Temporary Accommodation, Taking Account of Stays 1+ Years</b>				
<b>Year</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18<sup>20</sup></b>
<b>Average length of stay (excluding those ≥1)</b>	261	341	373	381
<b>% increase from previous year</b>	-	31%	9%	2%
<b>Average length of stay (including those ≥1)</b>	261	342	373	526
<b>% increase from previous year</b>	-	31%	9%	41%

Source: Arneil Johnston, 2018

Table 3.6 shows the turnover rates of temporary accommodation by East Lothian area. It is clear that the turnover rates in Musselburgh and Tranent reduce significantly when excluding those in temporary accommodation for more than two years.

<b>Table 3.6: Turnover of Temporary Stock by East Lothian Area, 2016-17</b>				
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>Total</b>	<b>Turnover all stock</b>
<b>Dunbar</b>	271.9	426.8	336.7	1.08
<b>Haddington</b>	310.2	477.4	392.7	0.93
<b>Musselburgh</b>	422.5	625.8	539.6	0.68
<b>North Berwick</b>	334.0	190.8	270.3	1.35
<b>Prestonpans</b>	401.3	513.6	463.3	0.79
<b>Tranent</b>	367.0	450.9	411.4	0.89
<b>Total</b>	<b>373.4</b>	<b>526.1</b>	<b>455.2</b>	<b>0.80</b>
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>Total</b>	<b>Turnover excluding 2 + years</b>
<b>Dunbar</b>	271.9	426.8	336.7	1.08
<b>Haddington</b>	310.2	436.5	369.1	0.99
<b>Musselburgh</b>	422.5	465.9	445.0	0.82
<b>North Berwick</b>	334.0	190.8	270.3	1.35
<b>Prestonpans</b>	401.3	427.6	414.9	0.88
<b>Tranent</b>	367.0	327.9	348.3	1.05
<b>Total</b>	<b>373.4</b>	<b>415.7</b>	<b>394.2</b>	<b>0.93</b>

Source: Arneil Johnston, 2018

As well as having a significant pool of temporary units, the Council remains reliant on B&B accommodation. The Council placed 305 households in B&B during 2017/18, an increase from 294 the previous year, which is of concern. The Council faces a significant focus on compliance with the Homeless Persons (Unsuitable Accommodation Order) (Scotland) and between 2004 and 2015/16, there were no breaches, however there were 6 breaches during 2016/17 and 13 breaches during

<sup>20</sup> This does not analyse a full year of data. The last end of accommodation date is 13 September 2017/18, therefore the average length of stay could be longer by the end of this year.

2017/18. Also of concern is the increase in children in B&B, with 61 children accommodated in B&B during 2017/18. This figure has not risen above 40 in previous years.

Given the need to reduce length of stay in both B&B and temporary accommodation, it is critical to ensure that void times in temporary accommodation are minimised. The year-end outcome for 2017/18 was an average void time of 19 days.

### 3.3 Costs of Temporary Accommodation

The costs of providing temporary furnished accommodation are generally met by rent payments for the properties, although the implementation of Universal Credit has seen an increase in rent arrears within temporary accommodation tenancies, similar to the increase in rent arrears for mainstream social rented tenancies. Universal Credit has caused the recovery rate to reduce to 27% and future spend remains a significant concern. The fortnightly charge to homeless households varies, dependent on the type and size of accommodation, with costs set out at Table 3.7. Council temporary accommodation rents are generally the least expensive, including a service charge of around £20. Leased property rents include a service charge of around £25; and private sector leased properties are typically the most expensive, inclusive of £110 service charge.

	<b>Council Temporary Accommodation</b>	<b>RSL Leased Properties</b>	<b>Private Sector Leased</b>
<b>2 apt</b>	148	388	335
<b>3 apt</b>	153	377	455
<b>4 apt</b>	160	332	467

Source: East Lothian Council, 2018

Also of concern is the impact of Universal Credit on the costs of B&B accommodation for homeless households. In accordance with the system, a household in receipt of housing costs through Universal Credit must be resident in that accommodation at the time their payment is made. If a household moves into B&B and subsequently moves into alternative accommodation prior to a Universal Credit payment being made, no payment will be made for the period in B&B, leaving the Council with a shortfall to meet. In addition the level of income received by the Council for payment for B&B accommodation has been significantly reduced under Universal Credit.

Costs of B&B range from £44 per night in contracted accommodation to £82 per night in non-contracted B&B accommodation. Households in employment pay the full contribution of £67 per week plus a £15 weekly service charge.

A key component of the HARSAG recommendations is a proposal to change the funding structure for temporary accommodation nationally although it is unclear when this will happen and what this is likely to entail. East Lothian Council intends to carry out a full independent financial appraisal of the current costs associated with temporary accommodation provision and impacts of Rapid Rehousing, to ensure due diligence in respect of decisions around the continued use / ceasing use of temporary accommodation / B&B. This will be a key priority for the Council prior to implementing this RRTP, with a further appraisal carried out, once proposals for the new funding structure become clearer.

**Total no. households living in temporary accommodation at 31 March 2018:** 404 including 70 in B&B

**Type of provision:** emergency (70); supported accommodation (32); temporary furnished flats (332) ; interim (10)

**Capacity of provision:** 12 emergency B&B – 70 rooms; 3 young person supported accommodation projects – 32 rooms; interim - 1 older 25's project – 7 rooms and 3 scatter flats; 332 temporary furnished flats

**Average length of stay in temporary accommodation:** 377 days

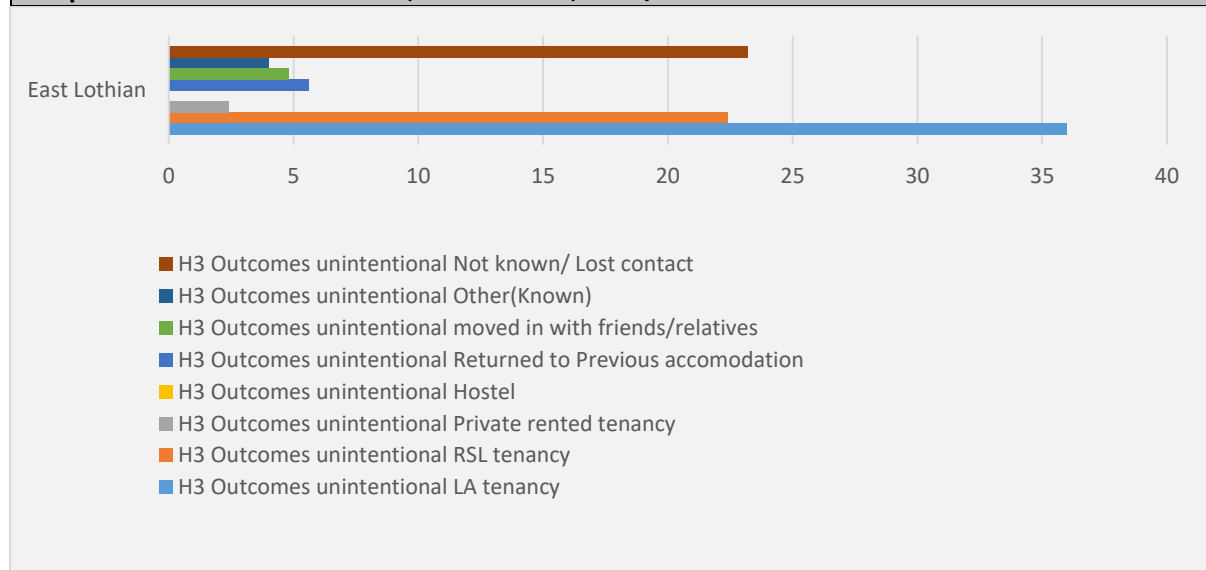
**Type of households:** Length of stay is considerably longer for single adult households

**Weekly Charge including rent / service charges:** This varies significantly from £74 to £234 inclusive of service charge

### 3.4 Rehousing Outcomes

It is clear from Graph 3.4 that the most common outcome for homeless households is a local authority tenancy, with 237 lets (36%) made to homeless households in the social rented sector in 2017/18. Total lets to homeless households in the private rented sector are considerably lower at 25 (3%).

**Graph 3.4: Homeless Outcomes, East Lothian, 2017/18**



Source: Scotland's Housing Network, 2018

Over the past five years, the Council has allocated between 40 and 45% of its vacant housing supply to homeless households, increasing to 48% in 2017/18. RSL's allocate around 50% of their general needs properties to homeless households. The proportion of allocations made to homeless households increased as a result of changes to allocations targets in 2016, however despite this, waiting times for re-housing continued to increase and accordingly, there has been a corresponding increase in time spent in temporary accommodation. The proportion of allocations to homeless applicants was reviewed in 2017/18 and by autumn 2018, allocations made to homeless applicants had increased to 62%.

**Total lets to statutory homeless households in the social rented sector:** 237

**Total lets to statutory homeless households in the private rented sector:** 13 (2.4%)

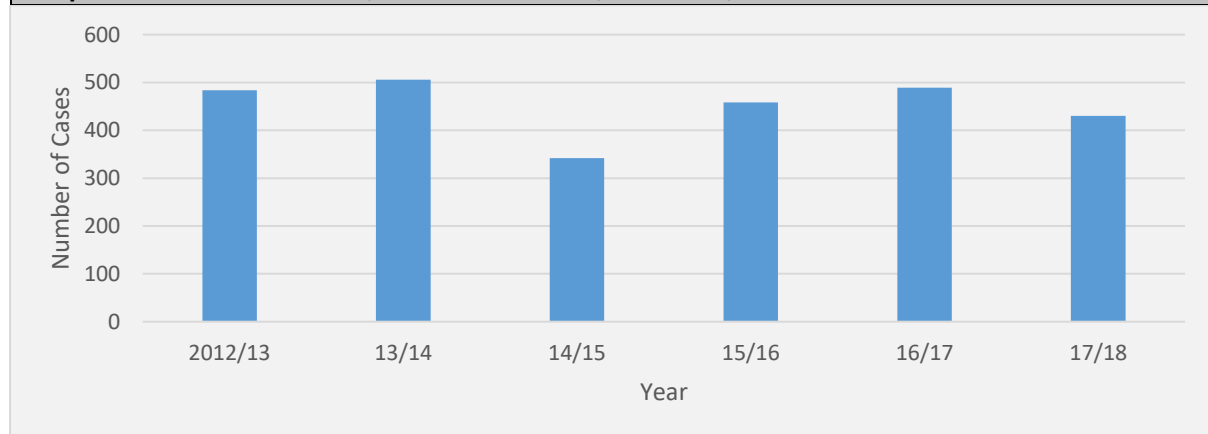
**Proportion of social lets made to statutory homeless households by type of landlord (LA and RSL):** LA 48% / RSL 50%

**All social and private lets made to statutory homeless households as a proportion of new homeless demand i.e. new assessments where there is a duty to house in a year:** 41%

### 3.4 Prevention

East Lothian Council provides a range of prevention activities for households at risk of homelessness, including the provision of advice; assistance to secure accommodation and assessing support needs, with mortgage advice also a significant area. The referral rate from the Council's Prevention Team to the Homelessness Service is around 20-25%, with 23% of cases being able to remain in their current accommodation. Graph 3.5 shows prevention activity in East Lothian since 2012/13.

**Graph 3.5: Prevention Cases, East Lothian 2012/13 – 2017/18**



Source: East Lothian Council 2018

Typically, prevention activity is delivered in circumstances where individuals are two months away from becoming statutorily homeless. Examples of prevention projects with external partners include:

- **East Lothian's SLAB project** - Supports East Lothian Council to employ two tenancy support workers, to provide support to social housing tenants with regard to welfare reform issues
- **Bridges Project** – Provides direct services to disadvantaged and / or at risk young people
- **Recycling First** – assists families in receipt of benefits to access necessary furniture items and collects second-hand furniture to distribute to disadvantaged household
- **Edinburgh Cyrenians, Asked to Leave / Conflict Resolution** – Supports families where a young person has been asked to leave the home due to relationship breakdown

There has been an increase in the number of households seeking prevention work since 2014/15, with a 7.7% increase between 2015/16 and 2016/17. Recent trends are as follows:

- Demand for the service is maintained at the expected level
- Activities undertaken in prevention cover a range of areas, predominantly the provision of advice, assistance to secure accommodation and assessing support needs
- Mortgage advice and assistance continues to be a significant area in terms of prevention activities

- With regard to outcomes, around 17% of closed prevention cases are closed on the basis of a referral to the Response Team
- Around 83% of cases are closed on the basis that homelessness is avoided and the applicant remained in existing accommodation or found alternative secure accommodation

Rent deposit activity has reduced dramatically from approximately 90-100 per annum from 2010-14 to 16 during 2017/18, which is predominantly due to landlord concerns in relation to Universal Credit, a decline in available property and landlords unwilling to accept homeless referrals from the Council. It will be important to work closely with landlords to improve rent deposit activity where possible.

East Lothian has a Private Sector Leasing (PSL) scheme, through which properties are released from the private rented sector to the Council, via a contracted provider, who is responsible for housing and property management functions. The properties provide an alternative to B&B accommodation for homeless households. The contract requires to be retendered while the Council considers the long term strategy with regard to PSL, given aspirations to reduce temporary accommodation.

East Lothian Council works with the Scottish Government in relation to the national Mortgage to Rent Scheme. This Scheme aims to help people whose homes are in danger of being repossessed to remain in their homes, with the Council buying their home and renting it back to them. One property was purchased through the Scheme in East Lothian in 2015/16, two properties in 2016/17 and two properties in 2017/18.

### 3.5 Support

The provision of housing support to homeless households is a requirement as per the Housing Support Duty 2013. Local authorities have a legal duty to provide housing support to those assessed as unintentionally homeless and in need of support. While the Housing Support Duty is legally only applicable to homeless households, the intention is to assist with homelessness prevention, therefore where possible, housing support and prevention activities are aimed at all households approaching the Council's housing service. It is clear from Table 3.8 that the provision of support is a key component of the Homelessness Prevention Service.

<b>Prevention Type</b>	<b>No. Provided</b>
<b>Assessment of Support Needs</b>	<b>280</b>
Assistance Alternative Accommodations	250
Assistance Claiming Benefits	189
Assistance Finding Employment Education Training	11
Assistance with Any Addictions	12
Assistance with Costs Essential Goods	26
Assistance with Landlords Mortgage Providers	140
<b>Basic Housing Support</b>	<b>46</b>
Direct Financial Assistance	28
Involvement Social Work Care Services	58
Other Services	16
Provision of Independent Financial/Legal Housing Advice	277
Use of Rent Deposit Guarantee Scheme	81

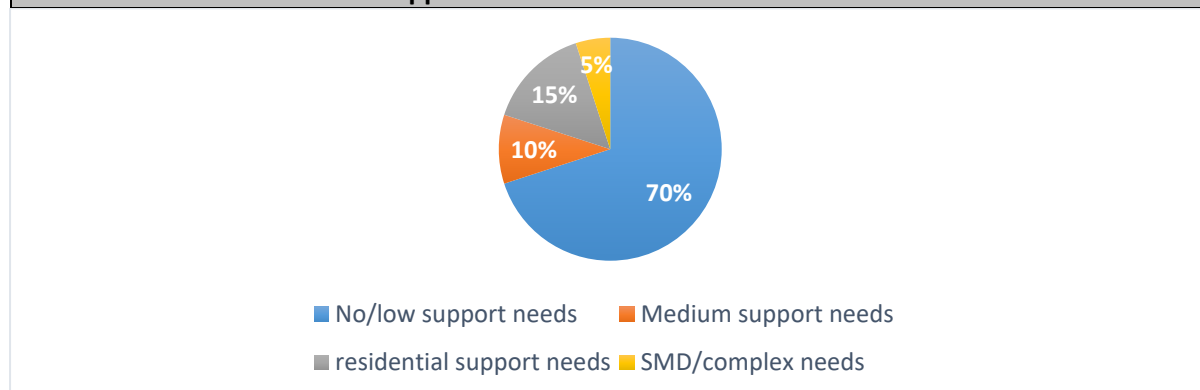
Source: East Lothian Council 2018

East Lothian Council also provides resettlement support. Between 2015/16 and 2016/17, there was a 93% increase in the number of individuals requiring resettlement assistance. In addition, a range of supported accommodation is provided for young vulnerable people at risk of homelessness and for individuals with complex needs, through providers such as Action for Children and Blue Triangle Housing Association.

Housing First provides mainstream settled housing as a first response for people with complex needs. It recognises a safe and secure home as the best base for recovery and offers flexible, open ended support, tailored to the needs of the individual. The model separates the provision of housing and support, offering choice and control to tenants and works to the principles of harm reduction. East Lothian Council recognises the current drive towards a 'Housing First' model and the need to provide direct access to settled accommodation as quickly as possible, with support. The Council acknowledges the significant body of research that indicates the Housing First approach is effective in addressing issues of mental health, substance misuse etc. as the individual is approaching support from a position of increased security in relation to tenure. Evidence to date also shows the Housing First approach to be an effective preventative measure to address chronic homelessness.

Local analysis of a snapshot of households in temporary accommodation at November 2018, suggests there are 415 current homelessness cases (70%) with no or very low support requirements who will easily move into mainstream settled housing with no need for specific support other than signposting and low level housing management support. There are 89 current homelessness cases with medium support needs (15%), whether visiting housing support or multi-professional wrap around support to enable people to live independently in mainstream housing. There are an estimated 59 current homeless cases (10%) with severe and multiple disadvantage or complex needs, who would benefit from intensive wrap around support and a Housing First approach to rehousing. Lastly, there are 30 current homeless cases (5%) where independent living in the community is not possible or preferable for whatever reason (i.e. choice, safety, risk to self and / or others) and for whom shared and supported accommodation is the preferred housing option.

**Chart 3.2: Estimated Current Support Needs 2018**



Source: East Lothian Council 2018

**Estimate of current no / low support needs:** 415 (70%)

**Estimate of current medium support needs:** 89 (15%)

**Estimate of current levels of SMD / complex needs:** 59 (10%)

**Estimate of current need for residential support:** 30 (5%)

DRAFT



# SECTION 4

Gap Analysis/ Projecting Future Need & Demand



# 4 Gap Analysis / Projecting Future Need and Demand

This section of the RRTP sets out an analysis of the gap between demand and supply, to show the scale of the issues in respect of homelessness and levels of pressure on temporary and permanent housing stock.

## 4.1 Methodology

Using triangulation (the use of two or more methods in a study to check the results) provides a test of validity, enables corroboration of findings and ensures this RRTP is well developed, having a deeper understanding of the issues. Where two different methods led to the same or a similar result, there can be increased confidence in the findings, leading to a robust and credible approach and quality outputs. This RRTP firstly uses the method set out in the RRTP transition tool<sup>21</sup>, with validation of this data achieved through cross verification with a second method, comprising independent modelling of temporary accommodation carried out by Arneil Johnston.

Use of the transition tool and secondary data enables a move away from number crunching and promotes a focus on analytical thinking, exploration and reasoning with regard to homelessness and temporary accommodation, within the context of the East Lothian housing market. Following the outlining of data outputs, assumptions and judgements are subsequently made in respect of the East Lothian housing system on the basis of evidence, focussing on reasons for the gap.

- **Method 1: Transition Tool – Baseline Position**

Using the structure provided in the Rapid Rehousing transition tool, a comparison of the current backlog (current caseload where there is a duty to house) plus projected new demand (taken as an average from the last three years of cases with a duty to house) is compared to most recent rehousing history (private rented sector and social rented sector) to statutory homeless households. Allowances are made for lost contacts and refusals. This provides a guide to the gap / scale of the issue between supply and demand and any proportional increase in lets required across housing sectors to meet new and backlog demand over the five year RRTP period.

Running the transition tool on the basis of the current position (Scenario 2: Current Position), the gap between demand and supply is 216 units of accommodation. This figure represents an indication of the level of annual increase required to meet annual homeless demand over the five year period. Over the five year period of the RRTP, the total shortfall is 1,080 units.

It is clear that the tool provides a basic indication of homelessness need i.e. in comparison with the Scottish Government tool for assessing housing need and demand. To use the tool to its full potential, further modelling is carried out to consider potential scenarios of change, given the current policy focus on homelessness and anticipated work towards meeting aspirations. This provides an indication of the likely gap within a different context. For example, the 'current position' reflecting the 2017/18 baseline shown in Table 4.1 uses 48% as a proportion of social lets that are let to statutory homeless households by local authorities, however we know that this has since increased to 62%. In respect of demographic change, there has been a 10.9% increase in population

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<sup>21</sup> <http://www.ghn.org.uk/rapid-rehousing-transition-plan/>

in East Lothian over the last ten years compared to 5.3% across Scotland. This is the second largest increase nationally, behind the City of Edinburgh. Population projections show East Lothian is projected to have the second largest population increase nationally at 8.6%, from 2016-26 (8.3% due to in-migration)<sup>22</sup>, which is likely to be reflected in higher levels of homelessness. However population change is not part of the RRTP transition tool and it is helpful to factor this in. We are also aware that at present, the outcome of Brexit negotiations is unclear and it is difficult to forecast the potential impact on the economy, although we know this could change dramatically over the next few months as major decisions are reached. Three further scenarios are run using the tool, to show the East Lothian position within a changing context.

- **Method 1: Transition Tool – Scenario Planning**

The RRTP aligns with the wider priorities of the **East Lothian Local Outcome Improvement Plan 2017-27** and the **East Lothian Council Plan 2017-22**, in particular the overarching objective of the Council Plan *‘reducing inequalities within and across our communities’* and the strategic goal to *‘improve the life chances of the most vulnerable people in our society’*. In accordance with this, the East Lothian Partnership is focused on reducing inequalities, tackling poverty and early intervention / prevention, through the East Lothian Local Outcome Improvement Plan. The **Local Housing Strategy (LHS)** sets out the following vision *‘Homelessness is prevented as far as possible, with appropriate support in place to promote positive health outcomes and tenancy sustainment’*.

This RRTP links to and sits within the wider context of these Strategies and Plans and accordingly, the three scenarios reflect the extent to which we could be meeting our strategic objectives:

**Scenario 1: Poverty and Inequality** – Despite concerted efforts to reduce inequalities, political discontent in respect of Brexit pervades and economic upheaval results in a continuation of austerity, with poverty and unemployment intensifying. Delivery of affordable housing is slow, with reduced capacity in the construction sector and LHS Housing Targets are not met. There is an increase in families in receipt of Universal Credit living in poverty and significant numbers of families experiencing in work poverty, having incomes topped up by Universal Credit. Landlords begin to sell property on the open market, as increased regulation of standards comes into effect and with a declining sector, already expensive rents continue to rise. In accordance with increasing poverty and inequality, homeless applications increase, assessed homelessness cases rise and overall demand for the service grows due to factors such as Universal Credit, within a context of wider population growth. Households remain in temporary accommodation, some for extensive periods, due to ongoing shortages of affordable housing and blockages in the system as the Council struggles to comply with statutory duties in respect of changes to the Homeless Persons (Unsuitable Accommodation Order) (Scotland). Allocations to homelessness reduce slightly below 2017/18 levels as demand on the housing list intensifies and competing priorities remain for smaller properties in particular, with low stock turnover and limited availability of new-build affordable housing.

**Scenario 2: Current Position** - This sets out the current position, using 2017/18 figures.

**Scenario 3: Limited Improvement** - Projected high priority affordable housing completions are realised in accordance with the SHIP and Housing Supply Targets in the LHS are met. The DWP, UK government and the Scottish Government consider the implications of the current administration of universal credit and other benefit changes on vulnerable people and make adjustments to ensure a fairer and more just approach, ensuring people have information and support to avoid sanctions. The impacts of austerity begin to reduce, in part due to ongoing work to reduce inequalities within

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<sup>22</sup> NRS Population change and projections 2016 based <https://www.nrscotland.gov.uk/files//statistics/population-projections/sub-national-pp-16/pop-proj-principal-2016-tab-publication.pdf>

and across our communities and the Council’s Welfare Rights Team see a higher rate of income gain for families in poverty. Homeless applications reduce slightly and the current level of allocations to homelessness is maintained as pressures on the housing list begin to subside. Some progress is made to clear the backlog of households in temporary accommodation, particularly in areas of new build affordable housing activity, although other areas across the county remain challenging in respect of homelessness pressures.

**Scenario 4: Prosperity and Growth** - Projected affordable housing completions are realised in full in accordance with the aspirations of the SHIP, with increased subsidy available. Housing Supply Targets in the LHS are exceeded and the City Region Deal delivers real, tangible opportunities for residents across the region. Embarking on a journey towards accelerating economic and inclusive growth, employment opportunities are opened up and there is a decline in ‘in work poverty’. With ample additional supply, allocations to homelessness are increased and the backlog is reduced, enabling a focus on ‘current’ flow through the system. The Council is able to provide direct access to settled accommodation quickly, with Housing First support in place for those who require this.

The results of Scenarios 1-4 are shown in Table 4.1. It is clear that with Scenario 1, there is potential for the gap between demand and supply to worsen to an estimated 292 units per annum and mitigating action must be put in place to minimise this risk. It is also evident that even with ‘Limited Improvement’ and ‘Prosperity and Growth’ scenarios, significant shortfalls of 150 and 91 respectively still remain.

<b>Table 4.1: East Lothian Annual Gap Between Homelessness Demand and Supply, 2017/18</b>				
<b>Transition Tool Variables</b>	<b>Scenarios</b>			
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
Total homeless applications	888	<b>807</b>	767	726
Total new assessments in the financial year where LA has duty to find settled accommodation	630	<b>573</b>	544	516
Open homeless cases where there is a duty to house at 31 March	593	<b>593</b>	534	475
Average length of case (cases closed in financial year - no. of days)	424	<b>385</b>	366	347
Total no. cases in temporary accommodation at 31 March	404	<b>404</b>	384	404
Average length of stay in temporary accommodation	238	<b>216</b>	205	194
Total lets to statutory homeless in the social rented sector	220	<b>237</b>	270	290
Total lets to statutory homeless in the private rented sector	10	<b>25</b>	30	40
Proportion of social lets to statutory homeless households by LAs	43%	<b>48%</b>	62%	65%
Proportion of social lets to statutory homeless households by RSLs	43%	<b>50%</b>	55%	60%
New homelessness demand (i.e. new assessments where duty to house – unintentionally homeless)	630	<b>573</b>	544	516
All lets as a proportion of new homelessness demand	35%	<b>41%</b>	50%	64%
Backlog (current caseload where there is a duty to house)	652	<b>593</b>	534	475
Projected new demand based on average annual caseload (unintentionally homeless) in previous 3 years	545	<b>495</b>	470	445
Lost contacts in most recent financial year	143	<b>130</b>	123	117
Refusals in most recent financial year	9	<b>6</b>	4	2
Demand <sup>23</sup>	512	<b>478</b>	450	421
Supply	220	<b>237</b>	270	290
<b>Gap Between Demand and Supply</b>	<b>292</b>	<b>216</b>	<b>150</b>	<b>91</b>

<sup>23</sup> Demand comprises current backlog divided by 5 to represent the R RTP period plus new annual demand. This is compared to current supply of lets to statutory homeless households to provide a total gap (or surplus) between demand and supply and represents an indication of the level of annual increase required to meet annual homeless demand over the five year period.

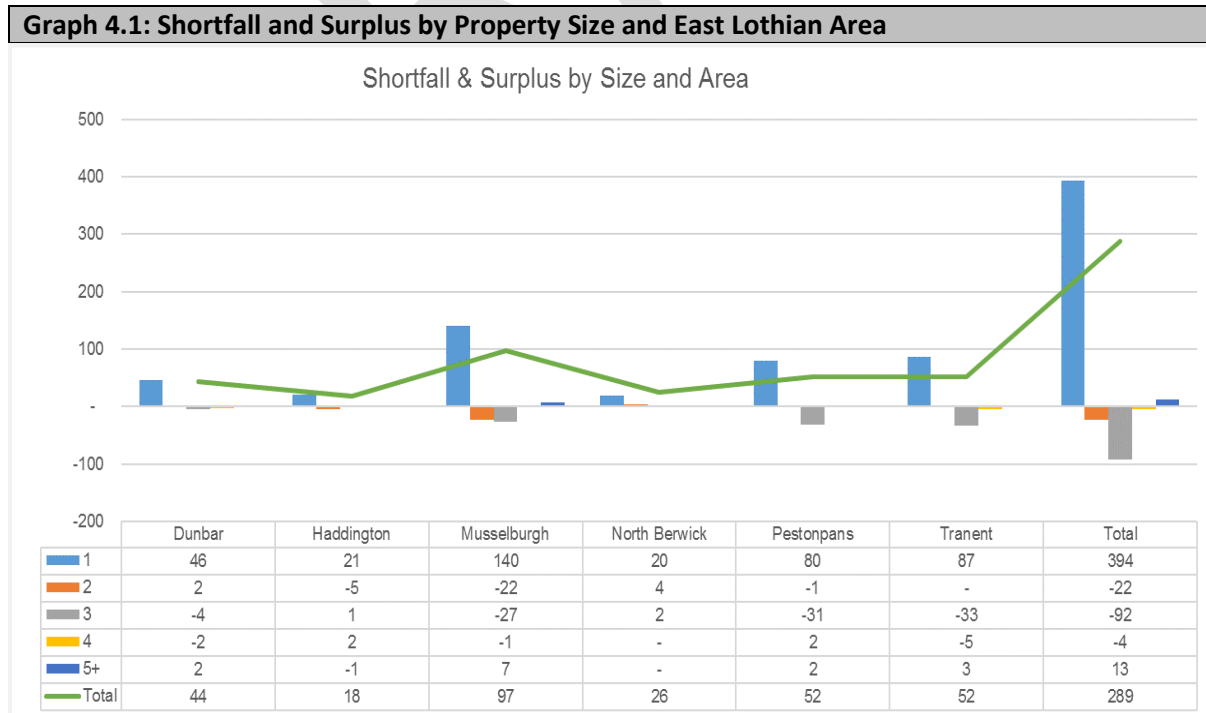
- **Method 2: Temporary Accommodation Modelling**

Independent temporary accommodation modelling completed by Arneil Johnston in March 2018 considered a snapshot of demand in comparison with supply by East Lothian sub-area based on 2016/17 data.

<b>Table 4.2: Homelessness Demand and Supply, East Lothian Sub-Areas, 2016/17</b>							
<b>Demand – 746 Applicants Adjusted for Lost Contact (9%) &amp; 81% Acceptance Rate &amp; 455 Days LOS (0.8x Turnover)</b>							
Size	Dunbar	Haddington	Musselburgh	N.Berwick	Prestonpans	Tranent	Total
1	51	42	153	20	93	88	447
2	12	12	35	5	21	27	112
3	5	14	28	4	16	15	82
4	0	3	10	0	11	3	27
5+	3	0	7	0	3	3	16
<b>Total</b>	<b>71</b>	<b>71</b>	<b>233</b>	<b>29</b>	<b>144</b>	<b>136</b>	<b>684</b>
<b>Current Stock Available by Size and Area (All Stock)</b>							
Size	Dunbar	Haddington	Musselburgh	N.Berwick	Prestonpans	Tranent	Total
1	5	21	13	0	13	1	53
2	10	17	57	1	22	27	134
3	9	13	55	2	47	48	174
4	2	1	11	0	9	8	31
5+	1	1	0	0	1	0	3
<b>Total</b>	<b>27</b>	<b>53</b>	<b>136</b>	<b>3</b>	<b>92</b>	<b>84</b>	<b>395</b>

Source: Arneil Johnston, 2018

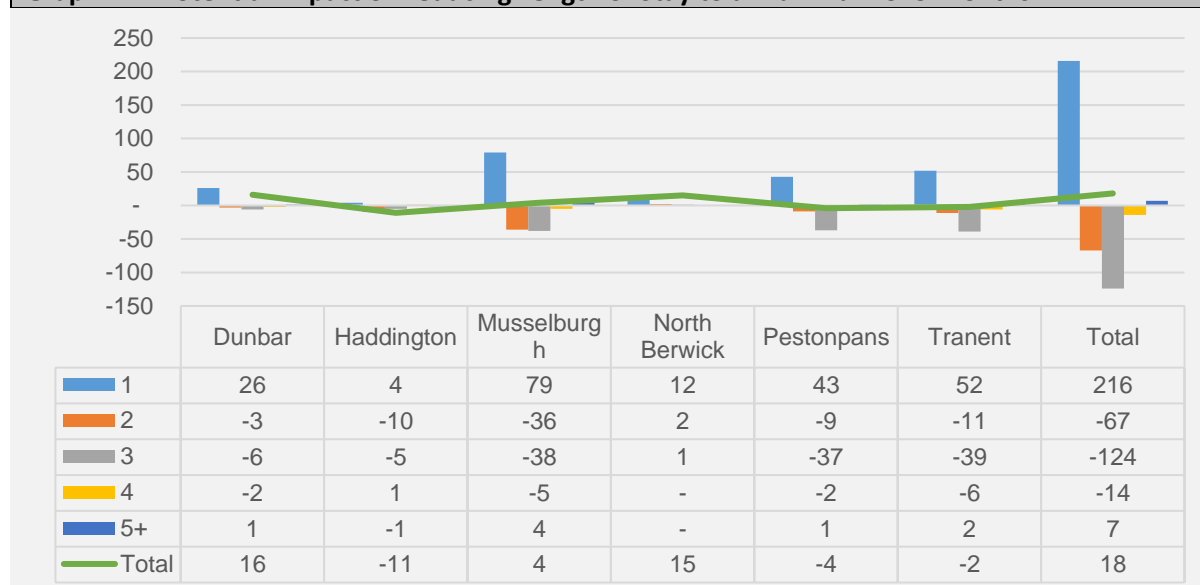
The analysis evidenced a net shortfall of 289 units of accommodation across all areas although the shortfall is highest in Musselburgh (140 units), followed by Tranent (87 units) and Prestonpans (80 units). The shortfall predominantly relates to one bed properties.



Source: Arneil Johnston, 2018

Taking this a stage further, analysis was carried out to consider the potential impact upon the shortfall of reducing length of stay in temporary accommodation to a maximum of 9 months. It is clear that even if this could be realised in practice, shortfalls of accommodation are still evident in the west of the county.

**Graph 4.2: Potential Impact of Reducing Length of Stay to a Maximum of 9 Months**



Source: Arneil Johnston, 2018

## 4.2 Bringing the Evidence Together

The RRTP transition tool estimates new demand and potential new supply each year for five years and incorporates a facility to clear the backlog over a five year period. Based on a 2017/18 baseline position, the tool estimates an annual deficit of **216 units**. In contrast, independent temporary accommodation modelling completed by Arneil Johnston in March 2018 considered a snapshot of demand in comparison with supply by East Lothian sub-area based on 2016/17 data and estimated a deficit of **289 units**. While it is acknowledged the differences in methodology are more complex, as a very basic comparison, method 1 provides an annual estimate spread over a five year period and method 2 provides a snapshot at a point in time, (which largely represents year one), with the two outputs broadly similar<sup>24</sup>. On this basis, recognising that the comparison is not strictly speaking 'robust and credible', it does provide East Lothian Council with further confidence that the figure of 216 units per annum as per the RRTP transition tool comprises a broadly accurate estimate of the gap between demand and supply in respect of accommodation for homelessness.

**Table 4.3: Outputs from Methods 1 and 2 – Gap Between Demand and Supply**

Method	Gap
RRTP Transition Tool Scenario 1	292
RRTP Transition Tool Scenario 2	216
RRTP Transition Tool Scenario 3	150
RRTP Transition Tool Scenario 4	91
Arneil Johnston	289

Source: East Lothian Council, 2018

<sup>24</sup> Taking cognisance of increased supply in 2017/18 relative to 2016/17

Bringing together the evidence set out in respect of the East Lothian housing market and homelessness pressures, it is clear that East Lothian has a unique and challenging set of circumstances, which result in a highly pressured local housing system, difficulties accessing suitable temporary accommodation with continued use of B&B as well as a significant pool of temporary units and limited / slow movement from temporary to permanent accommodation.

A recent independent report commissioned by Social Bite on behalf of the Homelessness and Rough Sleeping Action Group analysed the number of households in temporary accommodation at 31 March 2018 as a proportion of the total applicants in 2017/18 owed a duty to find settled accommodation. The report states:

*‘Temporary accommodation pressure is extraordinarily high in East Lothian with 71% of those owed a duty during the year remaining in temporary accommodation at the end of the year, suggesting acute blockages in the ‘flow’ of households through temporary accommodation’.*

Mirroring this, a recent report by Crisis focuses on the seven Scottish Council areas with the highest use of ‘unsuitable temporary accommodation’, which includes East Lothian<sup>25</sup>. With a continuing trend of increasing use of temporary accommodation year on year, extensive length of stay in B&B, increasing assessed homelessness cases and relatively low levels of lets generally, it is considered likely that the demand for temporary accommodation is still rising and levels have not yet begun to reach a peak. Key features of homelessness include:

- The decline in homeless presentations from 2010 has levelled off and appears to be moving into a position where applications are increasing.
- The level of demand for temporary accommodation is such that the Council remains dependent on B&B for temporary accommodation, with increasing use of such accommodation and households staying in B&B for longer periods. The Council placed 305 households in B&B during 2017/18, an increase from 294 the previous year, which is of concern. There has also been a significant increase in children in B&B, with 61 children accommodated in B&B during 2017/18. This figure has not risen above 40 in previous years.
- The Scottish Government’s Homeless Persons (Unsuitable Accommodation Order) (Scotland) has been amended to reduce the time that households subject to the Order (households with children or a pregnant family member) can remain in B&B accommodation from 14 to 7 days. This is likely to be extended to all groups, in accordance with HARSAG recommendations and will place additional pressure on the Council to ensure that families are moved on quickly from B&B accommodation. Between 2004 and 2015/16, there were no breaches, however there were 6 breaches during 2016/17 and 13 breaches during 2017/18.
- Despite higher levels of housing allocations to homeless households, waiting times for re-housing are increasing significantly and as a result, the length of time spent in temporary accommodation is increasing. Turnover in temporary accommodation has slowed down as homeless households await an offer of permanent housing, creating a backlog in the system.

It is evident that homelessness in East Lothian is predominantly a structural issue, with a lack of affordable housing supply across the county, exacerbated by limited land supply and substantial costs required for infrastructure. 1,597 new affordable homes have been delivered within East Lothian since 2007, of which 752 are new council homes for social rent. 708 have been delivered through our Housing Association partners again for social rent, with a further 137 intermediate

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[https://www.crisis.org.uk/media/239523/i\\_wont\\_last\\_long\\_in\\_here\\_experiences\\_of\\_unsuitable\\_temporary\\_accommodation\\_in\\_scotland\\_-pdf.pdf](https://www.crisis.org.uk/media/239523/i_wont_last_long_in_here_experiences_of_unsuitable_temporary_accommodation_in_scotland_-pdf.pdf)

tenures such as discounted sale and mid-market rent delivered through other financial models. Despite an ambitious new build programme, maximizing opportunities to accelerate affordable housing and actively taking forward a range of innovative solutions with key partners to increase the supply of affordable housing, housing need remains high at an estimated 370 affordable units per annum over a 20 year period<sup>26</sup>. These structural issues are further exacerbated by the impact of the roll out of full service Universal Credit, which has significantly reduced housing opportunities for homeless households.

**It is evident that success with regard to Rapid Rehousing will be premised to a significant extent on increasing the supply of affordable housing. Preparing a five year RRTP within the context of uncertainty around subsidy for affordable housing beyond 2021 is therefore a significant concern for East Lothian Council.**

**It is acknowledged that it is in the interests of all parties to reduce the use of temporary accommodation and make permanent housing available as quickly as possible, with support provided where appropriate. Within this challenging context, the East Lothian Council RRTP will aim to make a meaningful, although realistic impact by 2023/24, with a recognition that further ongoing action will be required to work towards more ambitious aspirations to end homelessness across the county in the longer term. Achieving these aspirations however, is dependent on increasing the supply of affordable housing in East Lothian and ensuring funding for adequate levels of support.**

### **4.3 Re-Housing Targets**

On the basis of evidence in this report, the gap between demand and supply is estimated at circa **216 units per annum**. The housing need / demand figure for homelessness requires to be subsequently refined as a re-housing target, with the need / demand estimate considered a starting point for determining a re-housing target, which in some respects is a policy decision<sup>27</sup>. Several factors such as the level of finance allocated to deliver the RRTP, housing policies and the capacity of the Council, its housing partners and the construction sector to deliver new affordable housing require to be considered, to inform a realistic interpretation of what can be achieved in practice. In accordance with RRTP Guidance, the proportions and numbers for rehousing / support should include existing backlog cases and likely new case requirements over 5 years, presented as an annual requirement for 5 years.

**Table 4.4 sets out how the Council anticipates meeting the shortfall, with proposals set out in this RRTP for 860 new tenancies, over and above 2017/18 levels. This is an average of 172 new tenancies per annum. While this will not meet estimated need of 216 units per annum, it is considered that this will make a meaningful difference in addressing homelessness over the five year period, with further work required beyond 2024. An additional 102 units of new affordable housing supply will be created. Furthermore, 150 temporary units will be re-designated as permanent accommodation over the five year period, reducing the existing pool of temporary furnished flats from 332 to 182.**

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<sup>26</sup> <https://sesplan.gov.uk/assets/images/HNDA/FINAL%20SESPLAN%20HNDA2.pdf>

<sup>27</sup> This approach aligns with the Scottish Government Guidance on translating a HNDA figure into a Housing Supply Target.



<b>Table 4.4: Meeting the Shortfall – New Tenancies Additional to 2017/18 Levels, East Lothian</b>						
	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>Total</b>
<b>Allocations</b>	70	70	70	70	70	350
<b>Open Market Acquisitions / Off the Shelf</b>	20	6	6	10	10	52
<b>Home &amp; Belonging Project</b>	4	8	8	8	8	36
<b>Rent Deposit Scheme</b>	24	24	24	24	24	120
<b>PRS Investment Model</b>	16	15	15	15	15	76
<b>Discharge into Private Residential Tenancies</b>	25	25	25	25	25	125
<b>Shared accommodation</b>	4	6	8	10	12	40
<b>Veterans Project</b>	-	6	-	-	-	6
<b>New Build Project</b>	-	-	-	-	30	30
<b>Empty homes</b>	5	5	5	5	5	25
<b>Sub-Total</b>	<b>168</b>	<b>165</b>	<b>161</b>	<b>167</b>	<b>199</b>	<b>860</b>
<b>Re-designate temporary units as permanent accommodation</b>	20	30	30	30	40	150
<b>Total</b>	<b>188</b>	<b>195</b>	<b>191</b>	<b>197</b>	<b>239</b>	<b>1,010</b>

Source: East Lothian Council 2018

A locally agreed target is also required in respect of the maximum time that homeless households will be living in temporary accommodation to be achieved within 5 years. Using modelling carried out by Arneil Johnson as a guide and assuming re-housing targets are met, the Council is aiming to achieve a position whereby homeless households will spend a maximum time of **9 months** in temporary accommodation by 2024. In accordance with proposed legislative change, the Council will also aim to achieve a position whereby all homeless households will spend a maximum time of 7 days in B&B.

**Gap between demand and supply:** 216 units per annum (total 1,010 over 5 years)

**Re-housing Target:** 172 units per annum (total 860 over 5 years) – over and above 2017/18 levels

**Re-designation of temporary units:** 30 units per annum (total 150 over 5 years)

**Maximum length of stay in temporary accommodation by 2024:** 9 months

## 4.4 Housing First Targets

East Lothian has a high rate of tenancy sustainment generally, with 91.3% of new tenancies sustained for more than a year in 2017/18 compared with 88.7% nationally. For homeless households, the percentage of new tenancies sustained for more than a year was 91.5% in 2017/18 compared with 88.2% nationally. This reflects homelessness as primarily a structural problem in East Lothian, with the majority of households simply requiring accommodation. Repeat homelessness is also relatively low at 3.1% compared with 6.4% nationally.

Section 3.5 of this RRTP sets out a snapshot of support needs in respect of households in temporary accommodation at November 2018, shown in Table 4.5. The proportions of households requiring different levels of support remains unchanged over a number of years and it is anticipated that while homelessness applications / assessed homelessness may increase, the trends in respect of support

requirements are likely to continue. On this basis it is considered that with a 10% increase in applications, taking cognisance of improved flow through the system and a reduction in temporary accommodation, there is likely to be a maximum of 65 households in the homelessness system at any one point in time who could potentially benefit from Housing First. This broadly correlates with recent national research which suggests that there are 49 households experiencing severe and multiple disadvantage in East Lothian. On this basis, provision is set out in this RRTP for 50 Housing First placements by 2023, with further provision made for additional tenancy support.

<b>Housing</b>	<b>Level of Support</b>	<b>No. Current Cases</b>	<b>Proportion Current Cases (%)</b>	<b>No. Current Cases + new need</b>
<b>Mainstream housing</b>	None low (housing management based)	415	70	457
<b>Mainstream housing</b>	Medium (individual housing support wrap around multi-service)	89	15	98
<b>Mainstream housing – Housing First</b>	High level wrap around support	59	10	65
<b>Supported accommodation</b>	Residential support	30	5	33
<b>Total</b>	-	593	100	653

Source: East Lothian Council 2018

# SECTION 5

Action plan to achieve Rapid Rehousing



# 5 Action Plan to Achieve Rapid Rehousing

This section of the RRTP sets out how transformation can be achieved in practice, moving from the current position to achieving a Rapid Rehousing approach. Building on consultation and engagement with a wide range of stakeholders and detailed consideration of what is required to make this approach work, the five priority outcomes are set out with corresponding actions.

## Priority Outcome 1: Homelessness is prevented as far as possible

- **Widening and Extending Housing Options**

The homelessness prevention approach provides a range of services including multi-tenure tenancy support to around 425 applicants per annum with a 90% success rate in preventing homelessness. As a result of this intervention, there has been a reduction in homeless presentations of around 35% since 2012. We will continue to take a person-centred approach that focuses on prevention, to work towards ending homelessness and implement a preventative approach on a wider scale. Preventing homelessness is just as important as how we respond and it will be important to work towards targeting resources at prevention and early intervention activities as opposed to crisis response. **We will review and evaluate prevention and early intervention activities.** The Housing Options Hubs are collectively seeking to develop a range of training materials to support local authority staff to obtain the appropriate skills, attitudes and competencies required to implement a preventative approach. Preparation of a 'Housing Options Training Toolkit' will support internal training delivery through e-learning and facilitated training sessions. Working in partnership as part of the East Hub, **we will implement the national housing options training toolkit.** A 'spend to save' prevention fund could form part of the 'toolkit' of options to assist with the prevention of homelessness, with a discretionary scheme available to enable the Council to make relatively small payments in order to prevent homelessness, saving money that could have been spent on temporary accommodation or B&B. **We will implement a 'spend to save' prevention fund** to improve and extend housing options for homeless households.

- **Early Targeted Intervention**

We know we should be targeting interventions at services coming into contact with vulnerable households in advance of homelessness and housing services i.e. Education is well placed to identify those chaotic households which are likely to include young people who may be 'asked to leave'. Acknowledging this, **we will strengthen links with Education and Employability services** and seek to work closely with Job Centre Plus; the Council's Children's Services Team etc. It is recognised that protocols in respect of young people leaving care require clarity and in accordance with this, **we will review again protocol arrangements for young people leaving care to enable a planned approach** and ensure appropriate access to housing including supported accommodation. The Council and its partners understand the importance of a safe home for everyone and acknowledge that individuals leaving custody often face a series of barriers and difficulties in adapting to life outside of prison. Having a secure address can often be the difference between re-entry to the prison system and progress towards desistance. The Council and partners have taken a number of key steps towards achieving SHORE 'Sustainable Housing on Release for Everyone' principles and are committed to **implementing the SHORE standards.** Work is also underway in partnership with the East Hub to **scope the potential provision of a homelessness assessment and advice service in HMYOI Polmont.**

We will **implement pre-tenancy checks** in respect of social rented allocations for early identification of vulnerabilities and **monitor the effects of Welfare Reform / Universal Credit, introducing mitigating measures where possible to ensure no one becomes homeless as a result.**

- **Improve Prevention Activity in the Private Rented Sector**

Recognising that a significant proportion of households become homeless from the private rented sector, **we will develop an information and advice pack for private landlords and tenants.** Acknowledging that we could significantly improve links with private landlords, **we will re-establish mechanisms for private landlord and tenant engagement.** A dedicated resource will be required to proactively improve prevention activity in the private rented sector, focussing on improving links with letting agents, promoting use of the rent deposit scheme, considering options around flat-share, hosting families etc. and **we will recruit a Private Sector Development Officer** to lead on this.

## Priority Outcome 2: Access to existing housing is improved across all tenures

- **Improving Access from Temporary to Permanent Accommodation**

The Council has increased the provision of temporary accommodation by around 45% since 2012, ensuring that where homelessness has been unavoidable, we have been able to provide temporary accommodation in accordance with our statutory duties. It is clear from evidence that the principle means of rehousing from temporary accommodation is the allocation of a Council or RSL tenancy. However, with a significant pool of 332 temporary furnished flats, this has removed permanent housing options from the system and in some respects contributed to a backlog in temporary accommodation as homeless households face longer waiting times in temporary accommodation. Congestion in temporary accommodation subsequently results in a build-up of pressure on the Council's housing list, with increasing numbers of homeless households on the priority list for rehousing. It is a risk to the Council that unless action is taken to improve throughput from temporary accommodation it is extremely unlikely that we will be in a position to continue to meet legal responsibilities in relation to the Homeless Persons (Unsuitable Accommodation Order) (Scotland), particularly with proposed changes to a 7 day maximum stay for all households. It is critical that **we carry out a whole systems review of temporary accommodation and implement recommendations** where possible and where this is appropriate. **We will implement a rolling programme to re-designate temporary accommodation as permanent tenancies,** again where this is possible and appropriate. Some households have been in temporary accommodation for lengthy periods of time and we will continue to focus on targeting these households first. It is imperative that we reduce temporary stock and accommodate households in mainstream permanent housing quickly and efficiently. We must work towards rebalancing the housing system in order that we can refocus resources away from the dealing with the backlog of households in temporary accommodation and concentrate on dealing with immediate flow and throughput.

- **Improving Access to Social Rented Housing**

The proportion of housing allocation to homeless households increased in 2016, however waiting times for rehousing continued to increase significantly and in parallel with this, the length of time in temporary accommodation continued to rise. We will continue to **review the proportion of allocations to homeless applicants** and seek prioritisation of preference, to ensure targets appropriately reflect demand while ensuring balanced communities. This will focus turnover within the homeless allocations process ensuring that optimum levels of temporary accommodation is available to support eradication of the use of B&B accommodation for households other than in emergency situations. The Council will continue to reduce the time to rehouse applicants. Aligned to this, where we have households who have been living in temporary accommodation for lengthy periods of time, **we will refer long-term cases to the re-housing panel for additional points.** We are

undertaking a comprehensive **review of the existing Council Allocations Policy** with a focus on addressing urgent homelessness pressures i.e. removal of temporary accommodation points, award flat rate of homeless points prioritised by homeless assessment date and review choice options (areas and house types), following detailed consideration in respect of effective approaches to allocations policies within a pressured housing context. The Scottish Government is currently reviewing the effectiveness of Section 5 referrals within the context of a wider review of Allocations Guidance. At present around 50% of RSL lets are made to homeless households. Working in collaboration with our RSL partners, **we will explore options re increasing the proportion of RSL allocations to homeless applicants.**

In part, difficulties from accessing social rented housing arise due to limited numbers of smaller size properties. To make best use of available stock, taking cognisance of good practice examples across Scotland, **we will explore flat-share arrangements for single people in temporary accommodation and B&B** with regard to potential opportunities for temporary and / or settled accommodation.

- **Improving Access to Private Rented Housing**

East Lothian is lacking in respect of a strong and affordable private rented sector, however it is recognised that we could be making better use of private rented housing. Discharge of duty into the private rented sector is currently limited in East Lothian. At present there is some uncertainty around the ability to discharge duty to an unintentionally homeless household into a private residential tenancy. We will clarify our legal responsibilities and actively encourage **discharging duties into the private rented sector** where this is deemed appropriate i.e. affordable and sustainable in the longer-term. We will work collaboratively with landlords to **maximise use of the rent deposit scheme**, providing deposits as opposed to rent guarantees and **retender the private sector leasing contract**, to make best use of the private rented sector and improve access for homeless households. We will also work with owners of empty homes, considering how we can best support owners to bring properties into use for affordable housing to alleviate pressure on the housing list. Exploring examples of best practice nationally, **we will review empty homes initiatives and increase lets to homeless households**

- **Improving Access to Alternative Tenures**

Mid-market renting is a form of affordable housing, enabling people to pay below standard private rent levels in their area. Rents are typically higher than in Council housing. Mid-market rent is currently targeted at households who are struggling to afford or cannot find private rented housing and cannot afford home ownership, but are unlikely to be given priority on the Council's housing list. Over the period of the LHS 2012-17, 44 units of mid-market housing were delivered and the Council is currently in discussions around setting up a Special Purpose Vehicle to help deliver additional units for mid-market rent. This should provide further opportunities to increase the delivery of intermediate tenures, expanding options for those on lower incomes and alleviating pressure on the private rented sector. It will be important for the criteria for the allocation of mid-market rent properties to **promote and enable access into mid-market housing for homeless households in employment**. This should link to improved marketing of mid-market rent housing to low income households generally.

### Priority Outcome 3: The homelessness system is more efficient and effective

- **Homeless Operations Policy and Associated Processes**

The Homelessness Operations Policy sets out the approach and process for dealing with casework. Currently, East Lothian Council spends an average of 55 weeks on closing cases compared to 34

weeks nationally. While this may simply reflect a high quality service, it is critical that we can demonstrate we are operating efficiently and effectively and actively driving flow through the system. **We will review the Homelessness Operations Policy** in accordance with the updated Code of Guidance and updated Code of Practice Addendum to ensure efficient and effective working practices. This will provide confidence that case management processes undertaken by Council staff meet the objectives of increased homelessness prevention activities and provide a more effective response when homelessness does occur. We will also use this opportunity to try and reduce levels of 'lost contact', currently at 23% compared with a national average of 10%. Aligned to this, **we will review roles and processes across the Council and streamline where appropriate**. This is likely to include mapping processes for open market acquisitions. Processes in respect of rent arrears will be reviewed, to ensure efficient and effective rent collection that is personalised and takes account of individual circumstances, which can often be challenging within the wider context of poverty and Universal Credit. The provision of furnished temporary tenancies has been highlighted through engagement with partners as further compounding loneliness and isolation, with a view that furniture should only be provided when needed, enabling temporary accommodation to feel more homely, with families surrounded by their own possessions and also potentially leading to savings in respect of the furniture budget. Processes for furnishing temporary accommodation will be reviewed. **We will implement a void policy, process review & prioritisation re homelessness** to improve timescales and prioritise void turnaround, i.e. in relation to cleaning, redecoration etc. employing a temporary Homelessness Voids Officer to focus on the transformation to Rapid Rehousing.

- **Embedding a Culture Change**

In order to support efficient and effective working practices across a wide range of teams, **we will carry out training and awareness raising sessions across the Council** to encourage a shared 'one council' approach. Promoting a culture of compassion and supporting our workforce to uphold the values of respect, understanding and being approachable, sessions will align with the Scottish Government approach to frontline staff and the wider public perception campaign. We will take an innovative approach to training, enabling staff to be actively involved in Rapid Rehousing and working together to end homelessness. We will also review procedures and protocols with partner organisations to embed a culture change and ensure efficient and effective working practices. Recognising a high proportion of households become homeless as a result of domestic abuse and understanding the importance of getting this right, **we will review procedures to ensure a more efficient & effective response to women experiencing domestic abuse**.

**Priority Outcome 4: Tenancy sustainment is increased, with improved access to appropriate support for people with complex needs**

- **Implementing a Housing First Approach**

Housing First provides mainstream settled housing as a first response for people with complex needs. A critical element of achieving a shift to Rapid Rehousing will be ensuring Housing First support is available to those who need it. **We will implement a Housing First initiative** and secure 50 Housing First placements by 2023, taking cognisance of the formal evaluation of the Housing First pathfinder projects. We recognise the value in working with the East Lothian Health and Social Care Partnership / Integrated Joint Board to jointly consider the resources for health and social care services that could assist households to live independently in their own homes, or where this is not possible, consider what specialist services are required from broader health and social care responses. **We will explore opportunities for collaborative working with public health / East Lothian Health & Social Care Partnership** to ensure a successful approach to Housing First across the

county. To enhance Housing First, we will **ensure targeted support to households in temporary and permanent accommodation** i.e. maximising use of Crisis services and work with local communities to **consider how local communities can reduce social isolation**, i.e. hosting communities. It is also important that we take cognisance of children in temporary accommodation, particularly given the growing numbers of children in B&B. Links must be established with 'Getting it Right for Every Child' (GIRFEC) to ensure a wellbeing assessment is undertaken in relation to each child in the household to make certain that any additional learning and / or social support is put in place to improve outcomes for children and families. **We will make formal consideration of the wellbeing needs of accompanying children (with a focus on domestic abuse) using a trauma informed approach and implement recommendations as appropriate.**

- **Improving Supported Accommodation**

A range of supported accommodation is provided locally i.e. by Blue Triangle Housing Association and Action for Children which is invaluable in supporting our most vulnerable people. The accommodation and support elements are of a high standard and key to achieving priority outcome 4. Notwithstanding this, it is important to ensure services are aligned to achieving Rapid Rehousing / Housing First and **we will review supported accommodation, address recommendations where possible and appropriate and support the development of psychologically informed environments.** In doing so, we will work with East Lothian Health and Social Care Partnership to consider whether supported accommodation continues to be part of a homelessness response or whether its specialist nature aligns it to the broader Health and Social Care Strategic Plan and commissioning frameworks.

- **Ensuring Appropriate Goods and Services for Tenancy Sustainment**

East Lothian has a relatively high rate of tenancy sustainment and low levels of repeat homelessness, evidencing that many homeless applicants simply require a home to call their own. Notwithstanding this, we recognise the value of ensuring households have suitable household goods and access to appropriate services i.e. painting and decorating when setting up a tenancy, to help them rebuild their lives, particularly within the wider context of poverty, deprivation and welfare reform. **We will establish a starter pack scheme, optimising support from local churches.** Alongside this, **we will explore opportunities in respect of the Council's Sustainable Procurement Policy and associated community benefits**, to ascertain the scope for provision of goods and services for homeless people when establishing a tenancy.

- **Ensuring Appropriate Skills for Tenancy Sustainment**

Ensuring people are well skilled for maintaining tenancies will be critical and **we will link with employability and training services, including digital skills development and pre-tenancy training** to help improve sustainment i.e. strengthening links with East Lothian Works and Community Learning and Development. A digital skills training programme commenced February 2018 and the Council's Corporate Policy Team is leading on a wider review of digital skills support services, which will link to homelessness and Rapid Rehousing aspirations. The Council funds the Bridges Project to deliver the highly acclaimed SQA accredited Tenancy Award, working in partnership with Borders College. **We will explore the potential for increased numbers of vulnerable young people including care experienced young people to receive support to attain SQA's accredited Tenancy Award.**

### **Priority Outcome 5: Supply of new permanent /settled housing is increased across all tenures**

- **Ensuring Appropriate Levels of Funding to Meet Targets**

Increasing the supply of affordable housing is critical to achieving Rapid Rehousing and taking cognisance of this, **we will meet Housing Supply Targets set out in the LHS** of 189 affordable units



per annum. Over the period 2018-23 we will ensure that the levels of affordable housing and the housing supply mix helps to support a Rapid Rehousing approach and ensure Rapid Rehousing is a critical component of LHS annual reviews. Levels of subsidy for affordable housing are uncertain beyond 2021 and we recognise that our Rapid Rehousing aspirations are largely dependent on increasing the supply of affordable housing. Within the context of 'Housing Beyond 2021', **we will work with the Scottish Government to consider innovative financial models and ensure continued subsidy for affordable housing** as per required levels set out in the 2018/19 SHIP and maximise subsidy where possible. Linked to this, **we will explore further potential funding opportunities via the City Region Deal & Inclusive Growth agenda.**

- **Incorporating Homelessness into the Development Planning Framework**

We consider that homelessness equates to the high end of housing need and with this in mind, will **seek to influence and incorporate a focus on homelessness into SESplan HNDA3** as appropriate, while ensuring alignment with Guidance and still adhering firmly to robust and credible criteria. Following on from comprehensive needs assessment, **we will agree and include rehousing targets for homelessness in the LHS / SHIP** to meet identified need and ensure homelessness is embedded firmly within the basis of the development planning framework. In parallel with this, we will also produce an East Lothian Local Investment Framework to improve the knowledge and understanding of need and demand in local areas. This information will be used to ensure a balance of affordable tenures and house types is delivered on all new proposed developments. **We will include homelessness analysis in the Local Investment Framework.** This work will aid improved and more effective **targeting in respect of Open Market Acquisitions**, through the SHIP, either for homeless households directly or to assist flow through the system / supply of affordable housing supply generally.

- **Implementing Innovative Models**

Creative approaches and joint working are key to meeting Rapid Rehousing aspirations. **We will seek to implement an innovative PRS investment model**, developed in partnership with Cyrenians and the National Homelessness Property Fund which could potentially provide 35 units in East Lothian and 30 in Midlothian. The model involves investment being made by East and Midlothian Councils, the Scottish Government and the National Homelessness Property Fund to purchase units on the open market and let to households at risk of homelessness or living in temporary accommodation, at LHA rate. Tenancy support would be provided by Cyrenians. This model could make effective use of the PRS to widen housing options and reduce the use of temporary accommodation / B&B. In addition, the Council is exploring the potential of a 'Home and Belonging – 'My Place, My Space' project. This would accommodate 20 care experienced young people in 10 three bed properties, supported by a 'live in' Queen Margaret University student, acting as mentor and providing an element of peer support. It is anticipated the project will reduce isolation and promote a positive environment for care experienced young people, with both students and care experienced young people receiving support via an independent support provider. The model would make effective use of stock, given the shortage of one bed properties in the west of the county. **We will explore the potential of a Home and Belonging project for care experienced young people and implement this.**

- **Targeting Increased Supply at Vulnerable Groups**

Recognising the importance of developing preventative pathways for groups at highest risk of rough sleeping and homelessness, we will also target our efforts in respect of increased supply at these groups. East Lothian Council has joined a commitment made in the East of Scotland to strengthen the public services and support available to the Armed Forces and Veterans Community and to raise awareness of the Armed Forces Covenant. In partnership with Scottish Veterans Garden City Association (SVGA), **we will develop 6 new build units for veterans** including disabled veterans, with corresponding support. Acknowledging the high proportion of young people who become homeless

in East Lothian, **we will commission / develop a supported accommodation service for vulnerable young people** with Blue Triangle Housing Association (BTHA) to provide 4 units of supported accommodation in close proximity to existing BTHA supported accommodation. In response to the high proportion of people who become homeless as a result of domestic abuse in East Lothian, we will **provide 4 additional units of refuge accommodation**, bringing the total to 14. Alongside this, **we will explore best practice models of accommodation for women presenting with co-occurring substance misuse complex mental health issues & domestic abuse & implement recommendations** where appropriate / possible. We will **acquire 12 off the shelf units and bring up to standard for use as permanent / supported accommodation for homeless households**. We will also **develop one or two new build sites in high demand areas, providing circa 30 units of smaller properties** for homeless households requiring support.

DRAFT

# SECTIONS 6 & 7

6: Resources 7: Monitoring & Evaluation



## 6 Resources

This section sets out the additional financial support required to achieve a Rapid Rehousing approach by 31 March 2024. It provides a summary of what the RRTP is articulating in terms of transformation and what this is estimated to cost, i.e. in respect of increasing the supply of affordable housing; reducing temporary accommodation stock and implementing Housing First.

This RRTP sets out **a requirement for a total of £7.221m, comprising £5.225m capital funding and £1.996m revenue funding to achieve Rapid Rehousing and the corresponding actions set out within the action plan by 31 March 2024. The detail of this is set out below in Table 6.1.** The additional financial support will enable the provision of 860 new tenancies, additional to 2017/18 levels, over the five year period of the RRTP, with corresponding new supply of 102 units for homelessness / prevention of homelessness. 150 temporary accommodation units will also be re-designated as permanent accommodation over the five year period.

East Lothian is in a unique position, as the first local authority in Scotland to experience full roll out of Universal Credit. This has significantly reduced housing opportunities for homeless households. Currently, a proportion of individual claimants are migrating back from Universal Credit to Housing Benefit due to a change in circumstances and it is anticipated a rent increase in Spring 2019 should provide a catalyst for further migration on a larger scale. However it is recognised that these cases will attract a lower level of subsidy than they previously did, resulting in a potential subsidy loss for the Council.

An additional funding allocation of £784,559 for East Lothian Council was agreed in April 2017 for the funding of provision of homelessness prevention and services for a two year period (2017/18 and 2018/19) following the abolition by the DWP of the 'management fee' for temporary accommodation. The Council apportioned £350k of this to Discretionary Housing Payments (DHP) administered by the Benefits Service. This enabled continuation of cover with regard to the temporary accommodation management fee for private sector leasing units, with the balance used for the prevention of homelessness. The Council requires this funding to be maintained at current levels as the success of Rapid Rehousing will include the re-designation of a number of temporary units as permanent accommodation. This will provide a trigger for these households to migrate / re-migrate back to Universal Credit (Housing Costs). Whilst they would no longer be entitled to receive Housing Benefit, single person households could be subject to size criteria / under occupancy under Universal Credit, which would require the Council to award DHP by way of an under occupancy top up. Given this, DHP awards in respect of temporary accommodation management fees may reduce, if only to be replaced by DHP awards for under occupancy. Given the anticipated loss of subsidy; ambiguity in relation to migration / re-migration and uncertainty around private sector leasing (the Council anticipates re-tendering and subsequently appointing an external contractor to manage the private sector leasing scheme for a two year period, while the transition to Rapid Rehousing takes place), the Council will require continuation of the above two year funding allocation of circa £785k in 2019/20, to provide a degree of stability and minimise risk. Further funding levels beyond 2019/20 will require to be reviewed going forward, to enable continued work towards Rapid Rehousing.

It is evidenced in this RRTP that success with regard to Rapid Rehousing will be premised to a significant extent on increasing the supply of affordable housing across the county. Preparing a five year RRTP within the context of uncertainty around subsidy for affordable housing beyond 2021 is of significant concern for East Lothian Council. Given that achieving the aspirations of this RRTP is largely dependent on increasing the supply of affordable housing in East Lothian, in accordance with

this, the resource allocation of £57.871m of subsidy set out in the SHIP for the delivery of 1,070 units to 2023/24 is critical.

**This RRTP sets out a requirement for a total of £7.221m to achieve Rapid Rehousing by 31 March 2024, comprising £5.225m capital funding and £1.996m revenue funding. This sum is requested within the wider context of continuation of £785k resource allocation during 2019/20, to provide a degree of stability and minimise risk as the Council transitions to a Rapid Rehousing approach and securing £57.871m subsidy as per the SHIP for the delivery of 1,070 units to 2023/24.**

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<b>Table 6.1: Resources Required to Achieve Rapid Rehousing by 2024</b>								
	<b>Funding Partners</b>	<b>Year 1 2019/20</b>	<b>Year 2 2020/21</b>	<b>Year 3 2021/22</b>	<b>Year 4 2022/23</b>	<b>Year 5 2023/24</b>	<b>Total Capital Funding</b>	<b>Total Revenue Funding</b>
Implement national housing options training toolkit	East Hub	0.009						0.009
Implement a spend to save prevention fund	N/A	0.040	0.040	0.040	0.040	0.040	-	0.200
Scope the potential provision of a homeless assessment and advice service in HMYOI Polmont & implement	East Hub	0.003	0.003	0.004	0.004	0.004	-	0.018
Monitor the effects of Welfare Reform / UC, introducing mitigating measures where possible to ensure no one becomes homeless as a result	SG	0.785	-	-	-	-	-	0.785 <sup>28</sup>
Develop an information & advice pack for private landlords / tenants	TBC	-	-	0.005	-	-	-	0.005
Re-establish mechanisms for private landlord / tenant engagement	N/A	-	0.001	0.001	0.001	0.002	-	0.005
Recruit a Private Sector Development Officer	N/A	0.060	0.060	-	-	-	-	0.120
Explore flat-share arrangements for single people in temporary accommodation / B&B & implement	TBC	-	0.020	0.010	0.010	0.005	-	0.045
Maximise use of rent deposit scheme	N/A	0.030	0.030	0.030	0.030	0.030	-	0.150
Review empty homes initiatives & increase lets to homeless households	N/A	-	0.040	0.040	0.040	-	-	0.120
Implement void policy, process review & prioritisation re homelessness	N/A	0.040	0.040	0.020	0.020	-	-	0.120
Carry out training and awareness raising sessions	N/A	-	-	0.002	0.002	0.002	-	0.006
Implement a Housing First Initiative	N/A	0.040	0.050	0.050	0.050	0.050	-	0.240
Ensure targeted support to households in temporary and permanent accommodation	N/A	-	0.040	0.040	0.040	-	-	0.120
Consider how local communities can reduce social isolation & implement scheme	N/A	0.020	0.040	0.040	0.020	-	-	0.120

<sup>28</sup> In 2017/18, an additional funding allocation of £784,559 was provided to the Council of which £350k was allocated to Discretionary Housing Payments administered by the Benefits Service. This enabled continuation of cover with regard to the temporary accommodation management fee for private sector leasing units, with the balance used for the prevention of homelessness.

Review supported accommodation, address recommendations where possible & appropriate & support the development of PIE	N/A	-	0.020	-	-	-	-	0.020
Establish a starter pack scheme, optimising support from local churches	N/A	-	0.025	0.025	0.025	-	-	0.075
Meet Housing Supply Targets set out in the LHS	To be secured via SHIP	57.871	-	-	-	-	57.871 <sup>29</sup>	-
Implement innovative private rented sector investment model	SG, MLC, Cyrenians	1.833	0.070	0.097	0.097	0.097	1.795 <sup>30</sup>	0.399
Explore the potential of a Home and Belonging project for care experienced young people and implement	Bid circa £300k to Life Changes Trust yr1-3	-	-	-	0.100	0.100	-	0.200
Commission / develop a supported accommodation service for vulnerable young people	BTHA	0.008	-	-	-	-	-	0.008
Provide 4 additional units of refuge accommodation	N/A	0.016	-	-	-	-	-	0.016
Acquire 12 off the shelf units & bring up to standard for use as permanent / supported accommodation	SG	0.700	-	-	-	-	0.700	-
Develop one or two new build sites in high demand areas, providing circa 30 units of smaller properties	SG	2.730	-	-	-	-	2.730	-
<b>Total finance required to achieve Rapid Rehousing by 2024<sup>31</sup> - £7.221m</b>							<b>£5.225</b>	<b>£1.996</b>
<b>Total finance required to achieve Rapid Rehousing by 2024<sup>32</sup> - £65.8778m</b>							<b>£63.096</b>	<b>£2.781</b>

<sup>29</sup> To be secured via SHIP

<sup>30</sup>(grant funding and / or loan to be considered)

<sup>31</sup> Total finance excluding Scottish Government funding to be secured through the SHIP and Scottish Government additional resource allocation - as per 2017/18 level

<sup>32</sup> Total finance including Scottish Government funding to be secured through the SHIP and Scottish Government additional resource allocation - as per 2017/18 level

## 7 Monitoring / Evaluation

The LHS is the overarching statutory strategic document for housing, with the current Strategy covering a five year period from 2018-23. The RRTP will be published as a formal supplementary document of the LHS and progress towards the RRTP vision and priority outcomes will form a critical component of the LHS annual review.

Sitting alongside the LHS, the SHIP specifies the strategic investment priorities for affordable housing over a five year period to achieve the outcomes set out in the LHS and identify resources required to deliver these priorities. A draft East Lothian SHIP for the period 2019/20 - 2023/24 is currently being consulted on and will be published in Spring 2019. Following assessment and evaluation of this initial RRTP, a resource allocation will be determined for East Lothian and implementation of the Plan will commence thereafter. It is anticipated that the RRTP will be an integral part of the SHIP in future, with the RRTP reviewed annually as part of the SHIP process.

The Council considers the RRTP is a critical workstream and monthly meetings with appropriate Council staff have been set up until December 2021 in the first instance to monitor progress against the action plan. In addition, through consultation and engagement with partners, a key theme was a requirement for improved communication between agencies working with homeless households, with a perceived lack of cohesion in some respects about 'who does what'. Value was recognised in bringing together different perspectives, ideas and new ways of working etc. and a number of partners suggested an RRTP working group could be established to drive forward action. A group role and remit; terms of reference and responsibilities of members will be agreed in Spring 2019 and quarterly meeting dates agreed in advance for members. A wider virtual group will also be established, with information on progress distributed on a quarterly basis and the opportunity to input as and when required. Joint working with neighbouring authorities and through the East Hub will also be used as a vehicle to drive forward progress of RRTP actions, particularly in instances of shared services.

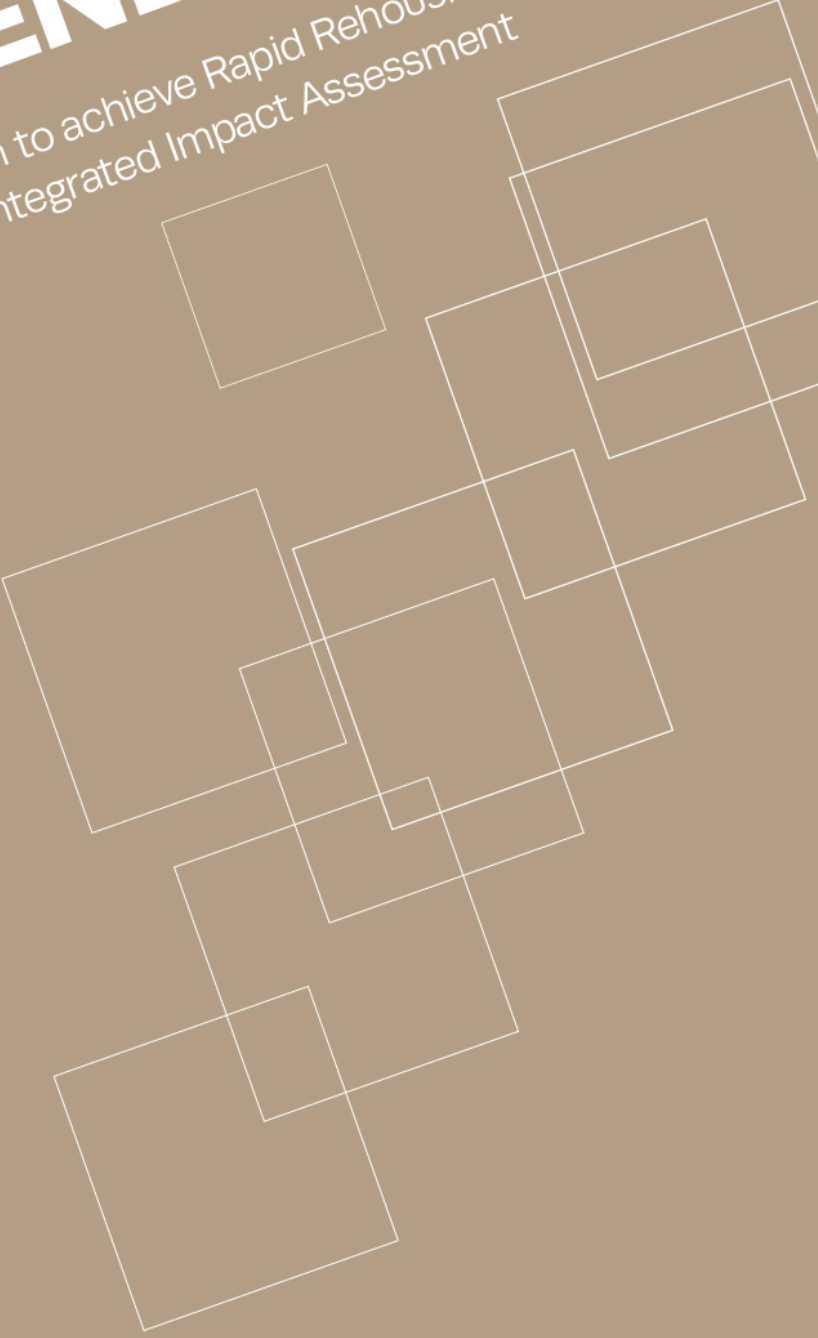
It is recognised that service user engagement will be critical in driving forward progress in relation to the RRTP. A review of homeless service user consultation and engagement will commence in Spring 2019 and mechanisms subsequently formalised for homeless service users to make a valued contribution to working towards ending homelessness and assist with monitoring and evaluation of the RRTP. It is likely that service user engagement will link to wider mechanisms already established in respect of corporate parenting and poverty.



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# APPENDICES

- 1: Action plan to achieve Rapid Rehousing
- 2: Integrated Impact Assessment



## Appendix One: Action Plan

Action	Timescale	Key Partners	Baseline	Target	Resources Required
<b>Priority Outcome 1: Homelessness is prevented as far as possible</b>					
Review & evaluate prevention / early intervention activities	June 2019	ELC Housing Options	No review in place	Review complete	N/A
Implement national housing options training toolkit	Dec 2019	East Hub	Toolkit development underway	In place by Dec 2019	£9k
Implement a spend to save prevention fund	April 2019	ELC Housing Options	No scheme in place	Scheme operational – Targets TBC	£200k
Strengthen links with Education / Employability services	Ongoing	Skills development Scotland	Limited links in place	TBC	N/A
Review protocol arrangements for young people leaving care to enable a planned approach	April 2019	ELC Housing Options; ELC Children’s Services	Protocol drafted & consultation underway	Protocol in place	N/A
Implement SHORE standards	Dec 2019	ELC; SPS; Four Square	SHORE standards under development	SHORE standards implemented & embedded	TBC
Scope the potential provision of a homeless assessment and advice service in HMYOI Polmont & implement	Dec 2019	East HUB; HMYOI Polmont	No resource	Resource in place	£18k
Implement pre-tenancy checks for early identification of vulnerabilities	Dec 2020	ELC Community Housing	Systems in place	Targets TBC	N/A
Monitor the effects of Welfare Reform / UC, introducing mitigating measures where possible to ensure no one becomes homeless as a result	Ongoing	One Council	Working Groups established	Various monitoring regimes in place – rent arrears, homelessness caseload etc.	£785k

Develop an information & advice pack for private landlords / tenants	Dec 2022	ELC Strategic Investment; ELC Licensing; Private Landlord Forum	No resource in place	Resource in place	£5k
Re-establish mechanisms for private landlord / tenant engagement	Dec 2020	ELC Strategic Investment; ELC Licensing; Private Landlord Forum	No mechanisms in place	Mechanisms in place	£5k
Recruit a Private Sector Development Officer	Oct 2019	ELC Strategic Investment; Housing Options	No resource in place	Resource in place	£120k
<b>Priority Outcome 2: Access to existing housing for homeless households is improved across all tenures</b>					
Carry out a whole systems review of temporary accommodation & implement recommendations	Dec 2019	ELC Housing Options; ELC Strategic Investment	No review underway	Review complete	N/A
Implement a rolling programme to re-designate temporary accommodation as permanent tenancies	Ongoing	ELC Housing Options; ELC Community Housing	0	30 per annum	N/A
Review the proportion of allocations to homeless applicants	April 2019	ELC Community Housing	48% (2017/18)	ELC Cabinet Approval re new targets	N/A
Refer long-term cases to re-housing panel for additional points	Ongoing	ELC Housing Options; ELC Community Housing	0	Targets TBC	N/A
Review existing Council Allocations Policy with a focus on addressing urgent homelessness pressures	March 2019	ELC Community Housing	Review underway	Review complete	N/A
Explore options re increasing proportion of RSL allocations to homeless applicants	Ongoing	ELC Community Housing; RSLs	Discussions underway	Agreement in place	N/A
Explore flat-share arrangements for single people in temporary accommodation / B&B & implement	Dec 2021	ELC Housing Options; ELC Strategic Investment	No arrangements in place	Scheme in place Target 40 tenancies	£45k
Discharge duties into the private rented sector	Ongoing	ELC Housing Options	0	125	N/A
Maximise use of rent deposit scheme	Dec 2021	ELC Housing Options; ELC Strategic Investment	16 (2017/18)	30 per annum	£150k
Re-tender private sector leasing contract	Dec 2019	ELC Community Housing; ELC Housing Options	No contract in place	Contract in place	N/A
Review empty homes initiatives & increase lets to homeless households	March 2023	ELC Strategic Investment	Review underway	Review complete Target 25 tenancies	£120k

Promote & enable access into mid-market rent housing for homeless households in employment	March 2023	ELC Strategic Investment	No review of criteria underway	Review complete (25% target)	N/A
<b>Priority Outcome 3: Homelessness systems and processes are more efficient and effective</b>					
Review Homelessness Operations Policy	Dec 2019	ELC Housing Options; ELC Community Housing	No review	Review complete	N/A
Review roles & processes across the Council & streamline where appropriate	Ongoing	ELC Community Housing	No review	Review complete	N/A
Implement void policy, process review & prioritisation re homelessness	July 2019	ELC Community Housing; ELC Property Maintenance	Review underway	Review complete Target 10 days	£120k
Carry out training and awareness raising sessions across the Council	Ongoing	ELC Strategic Investment; ELC Housing Options	0	150	£6k
Review procedures to ensure a more efficient & effective response to women experiencing domestic abuse	Dec 2020	ELC Strategic Investment; ELC Housing Options; Mid & East Lothian Women's Aid	No review	Review complete	N/A
<b>Priority Outcome 4: Access to support is improved for homeless people where appropriate</b>					
Implement a Housing First initiative	April 2023	ELC Housing Options	0	50 HF tenancies	£240k
Explore opportunities for collaborative working with public health / East Lothian Health & Social Care Partnership	Ongoing	ELHSCP, ELC Strategic Investment; Housing Options	Limited collaborative working in place	Projects operational	TBC
Ensure targeted support to households in temporary and permanent accommodation	Ongoing	ELC Strategic Investment; Housing Options			£120k
Consider how local communities can reduce social isolation & implement schemes	Ongoing	ELC Strategic Investment; Housing Options	Limited projects in place	Projects operational	£120k
Make formal consideration of the wellbeing needs of accompanying children (with a focus on domestic abuse) using a trauma informed approach & implement recommendations	Dec 2019	ELHSCP, ELC Strategic Investment; Housing Options; Children's Services, EMWA	No formal consideration	Recommendations implemented	TBC
Review supported accommodation, address recommendations where possible & appropriate & support the development of PIE	Dec 2019	ELHSCP, ELC Strategic Investment; Housing Options; BTHA; AFC	Review underway	Review complete / recommendations implemented	£20k

Establish a starter pack scheme, optimising support from local churches	March 2019	Housing Options; local churches; ELVON; Fresh Start	Protocols / procedures in draft	Scheme in place	£75k
Explore opportunities in respect of the Council's Sustainable Procurement Policy & associated community benefits	Dec 2019	ELC Strategic Investment; Procurement; Housing Options	No Policy in place	Policy agreed	N/A
Link with employability & training services i.e. digital skills development & pre-tenancy training	Ongoing	ELC Strategic Investment; Housing Options	No projects in place	Projects in place	N/A
Explore potential for increased numbers of vulnerable young people including care experienced young people to receive support to attain SQA's accredited Tenancy Award	March 2020	ELC Children's Services; Housing Options; SQA	0	Targets TBC	TBC
<b>Priority Outcome 6: Supply of new permanent housing is increased across all tenures</b>					
Meet Housing Supply Targets set out in the LHS	Annually	ELC Strategic Investment	0	189 per annum	£57.871m
Work with the Scottish Government to consider innovative financial models & ensure continued subsidy for affordable housing as per levels set out in 2018/19 SHIP	March 2020	ELC Strategic Investment; the Scottish Government	No certainty re subsidy beyond 2021	Continuation / certainty re subsidy levels	N/A
Explore further potential funding opportunities via City Region Deal & Inclusive Growth agenda	Ongoing	ELC Strategic Investment	No opportunities identified	Opportunities identified	N/A
Seek to influence and incorporate a focus on homelessness into SESplan HNDA3	Dec 2020	6 SESplan authorities (housing & planning) & SESplan	Development of HNDA3 under consideration	Robust & credible HNDA3	N/A
Agree & include rehousing targets for homelessness in LHS / SHIP to meet identified need	Nov 2019	ELC Strategic Investment	No HST for homelessness	Rehousing targets in SHIP / LHS	N/A
Include homelessness analysis in Local Housing Investment Framework	June 2019	ELC Strategic Investment; Housing Options	No LIF in place	LIF in place	N/A
Targeted purchasing of Open Market Acquisitions	Annually	ELC Strategic Investment & Housing Options	0	52 units	TBC
Implement innovative private rented sector investment model	Dec 2021	ELC Strategic Investment, Housing Options & Finance; Midlothian	0	76 tenancies	£2.194m (grant funding and /

		Council; Cyrenians; National Homelessness Property Fund; SG			or loan to be considered)
Explore the potential of developing a 'Home and Belonging – My Space My Place' project for care experienced young people and implement	Oct 2019	ELC Strategic Investment; Housing Options & Children's Services	Application submitted for 3 years funding to Life Changes Trust	36 tenancies	£200k
Develop 6 new build units for veterans with corresponding support	Dec 2021	ELC Strategic Investment	0	6 units	N/A <sup>33</sup>
Commission / develop a supported accommodation service for vulnerable young people	April 2019	ELC Housing Options & Children's Services; BTHA	0	4 units	£8k
Provide 4 additional units of refuge accommodation	June 2019	ELC Strategic Investment; Mid & East Lothian Women's Aid	10	14 units	£16k
Explore best practice models of accommodation for women presenting with co-occurring substance misuse complex mental health issues & domestic abuse & implement recommendations	Dec 2019	ELC Strategic Investment, Housing Options, ELHSCP, Public protection; Mid & East Lothian Women's Aid	No progress	Report complete / Recommendations implemented.	TBC
Acquire 12 off the shelf units & bring up to standard for use as permanent / supported accommodation	Dec 2019	ELC Strategic Investment	Approval to acquire	12 units	£700k
Develop one or two new build sites in high demand areas, providing circa 30 units of smaller properties	Dec 2019	ELC Strategic Investment	Investigation of appropriate sites	30 units	£2.7m

<sup>33</sup> Funding included within SHIP

## Appendix Two: Integrated Impact Assessment (Promoting Equality, Human Rights and Sustainability)



<b>Title of Policy/ Proposal</b>	East Lothian Rapid Rehousing Transition Plan 2019-24
<b>Completion Date</b>	Final Rapid Rehousing Transition Plan anticipated to be published Spring 2019
<b>Completed by</b>	Nicky Sandford, Senior Strategy Officer
<b>Lead officer</b>	Nicky Sandford, Senior Strategy Officer

### Type of Initiative:

- Policy/Strategy   
 Programme/Plan x       New or Proposed x   
 Project                       Changing/Updated   
 Service                       Review or existing   
 Function   
 Other .....

### 1. Briefly describe the policy/proposal you are assessing.

This Rapid Rehousing Transition Plan (RRTP) sets out the evidence base, strategy, priorities and plans to achieve Rapid Rehousing across East Lothian by 31 March 2024.



**2. Set out a clear understanding of the purpose of the policy being developed or reviewed i.e. objectives, aims, including the context within which it will operate**

This RRTP sets out how East Lothian Council and key partners anticipate making the transition from the current position in respect of homelessness to a Rapid Rehousing approach, over a five year period from 1 April 2019 to 31 March 2024. It sets out proposals to rebalance the local housing system to support improved outcomes for homeless and potentially homeless people, with a focus on increasing prevention and early intervention; reducing length of stay in temporary accommodation and temporary accommodation stock, in favour of providing permanent accommodation and improving flow through the system, increasing access to housing across all tenures.

It provides:

- A detailed evidence base in respect of the current and projected homelessness pressures, temporary accommodation position and balance between housing need and supply
- A vision / priority outcomes for 2024
- A route map showing how the Council and partners intend to achieve the vision
- Estimated costs / resources required to achieve transformation

### 3. What will change as a result of this policy?

The Rapid Rehousing Transition Plan 2019-24 sets out a wide range of housing related actions, which once implemented will lead to the overall vision being met and five priority outcomes being achieved. The strategic vision for housing is that by 2024 we will have:  
*'A fresh, new partnership arrangement enables a holistic approach to housing options, ensuring everyone has a home that meets their needs and a commitment to work towards ending homelessness in the longer term'.*

Five priority outcomes are identified to inform this vision:

- Priority Outcome 1: Homelessness is prevented as far as possible
- Priority Outcome 2: Access to existing housing for homeless households is improved across all tenures
- Priority Outcome 3: The homelessness system is more efficient and effective
- Priority Outcome 4: Access to support is improved for homeless people with complex needs, where appropriate.
- Priority Outcome 5: Supply of new permanent /settled housing is increased across all tenures

### 4. Do I need to undertake an Integrated Impact Assessment?

High Relevance	Yes / No
1. The policy/ proposal has consequences for or affects people	Yes
2. The policy/proposal has potential to make a significant impact on equality	Yes
3. The policy/ proposal has the potential to make a significant impact on the economy and the delivery of economic outcomes	Yes
4. The policy/proposal is likely to have a significant environmental impact	No
Low Relevance	

5. The policy/proposal has little relevance to equality	No
6. The policy/proposal has negligible impact on the economy	No
7. The policy/proposal has no/ minimal impact on the environment	Yes
<b>If you have identified low relevance please give a brief description of your reasoning here and send it to your Head of Service to record.</b>	
No / minimal impact upon the environment, identified through Strategic Environmental Assessments in accordance with the Local Housing Strategy (LHS). Environmental impacts are contained within the Local Development Plan as opposed to the LHS / RRTP.	

**If you have answered yes to 1, 2, or 3 above, please proceed to complete the Integrated Impact Assessment.**

**If you have identified that your project will have a significant environmental impact (4), you will need to consider whether you need to complete a Strategic Environmental Assessment.**

**5. What information/data/ consultation have you used to inform the policy to date?**

<b>Evidence</b>	<b>Comments: what does the evidence tell you?</b>
Data on populations in need	<p>Two <b>SESplan Housing Need and Demand Assessments</b> (SESplan HNDA1 and SESplan HNDA2) have been undertaken, published in 2011 and 2015, providing detailed evidence on housing need across the county. The assessments analyse key housing market drivers in order to estimate future demand for housing and provide a shared evidence base for the LHS and Local Development Plan. The evidence in HNDAs sets out the scale, nature, tenure and location of housing need and demand for affordable and market housing, broken down by four distinct tenures: Market housing comprising private (owner occupied) and private rented sector housing and affordable housing comprising intermediate tenures i.e. mid-market rent and social rented housing.</p> <p>The evidence provided in the HNDAs is wide ranging, with some key points from HNDA2 as follows:</p> <ul style="list-style-type: none"> <li>• It is estimated that around 11,400 units of housing are required in East Lothian during the period 2012-32.</li> <li>• Housing need and demand for market housing is 183 units per annum and for affordable housing is 370 units per annum.</li> <li>• Affordability issues are more pronounced in East Lothian relative to other areas in South East Scotland.</li> </ul> <p>A <b>Housing Need and Demand Assessment of Particular Needs Groups / Specialist Provision</b> provides estimates of need and demand for specialist provision for a range of particular needs groups, including homeless households, with a particular focus on care experienced young people; veterans and women and their children experiencing or at risk of domestic violence.</p>

	<p>Key points: Homelessness is increasing and demand is rising in respect of a wide range of smaller households i.e. single homeless households, with competing priorities for smaller house types.</p> <p><b>Local Housing Systems Analysis (LHSA)</b> analyses key elements of the housing system within the wider housing strategy landscape and economic and demographic context. It highlights key emerging trends, projections, issues and challenges, providing a detailed understanding of the local housing system and to what extent it is working well or 'in balance'. It provides evidence on the populations in need in relation to different housing tenures.</p> <ul style="list-style-type: none"> <li>• Key points: There is an acute shortage of affordable housing, particularly social rented housing, with high demand from both general needs and homeless households. As mid-market options are developed, the need and demand for alternative tenures is also likely to increase, with potential demand from homeless households in employment. As increased regulation is enacted in relation to the private rented sector (in relation to condition standards, energy efficiency, tenancy management and rent pressure zones), this sector is considered likely to decrease, with figures showing the sector is starting to level off, which is likely to have a negative impact on homelessness.</li> </ul>
Data on service uptake / access	Consideration is given to homelessness service reviews, which provide data on service uptake and outcomes. Consideration is also given to the ability of groups to access homelessness services through individual service related IIAs.
Data on quality / outcomes	Data on quality / outcomes is derived from a range of sources. The Scottish Social Housing Charter sets out key data in relation to social housing outcomes. This enables some consideration of households in need i.e. through analysis of data on homelessness and housing support. Further information is available through HL1; HL2; HL3; Prevent 1 and the East Lothian AVD database.
Research / literature evidence	<ul style="list-style-type: none"> <li>• A range of research / literature evidence informs and underpins the Draft RRTP. This includes wide ranging policy documents i.e. <b>Homes Fit for the 21<sup>st</sup> Century</b>, the Scottish Government's Strategy and Action Plan for the period 2011- 20; the Scottish Government Discussion Paper <b>Housing Beyond 2021</b> and the Scottish Government <b>High Level Action Plan on Ending Homelessness</b>. It also includes subject specific literature i.e. the Crisis report '<b>I Won't Last Long in Here</b>', looks at the experience of people in temporary accommodation, covering the seven most poorly performing authorities in respect of use of unsuitable accommodation (including East Lothian); the Social Bite '<b>Temporary Accommodation in Scotland</b>' report covers six local authority case studies including East Lothian and sets out some of the pressures that we face locally; and '<b>Housing Supply Requirements across Great Britain for Low Income Households and Homeless People</b>' could provide a useful starting point for consideration in relation to how homelessness could be better integrated into HNDAs.</li> </ul>
Service user experience information	East Lothian Council recognises the value of service user experience / information in informing the RRTP and the importance of mainstreaming equalities. Understanding that some people's views may not readily be heard via the use of traditional engagement methods, 20 focus groups were held during 2016-17 to inform preparation of the Local Housing Strategy. These enabled service user experience (in relation to vulnerable groups) to influence the LHS, promoting an inclusive approach to consultation from the

	<p>start of the development process. The groups had a focus on homeless people and vulnerable households i.e. people leaving prison; young care leavers and young vulnerable people asked to leave.</p> <p>The focus groups provided evidence on the key housing issues and challenges as perceived by vulnerable groups. Attendees at focus groups considered housing related priorities / outcomes; proposed a range of actions to meet those outcomes and contributed towards developing the strategic vision for the LHS. Feedback obtained was also used to inform this RRTP and Integrated Impact Assessment.</p> <p>Two large scale events were also held as part of the draft LHS development process, covering 3 days, which provided a further opportunity for service users to get involved and for the Council to take account of their experiences, with information received on homelessness informing this RRTP. A large scale event on Rapid Rehousing was also held in November 2018, to which around 200 service providers were invited and asked to input views on behalf of service users. One service user was asked to present at this event, to put forward their experience of temporary accommodation as a care experienced young person and influence the policy agenda in respect of Rapid Rehousing.</p>
Consultation and involvement findings	<p>Findings from consultation and engagement in respect of homelessness to inform the LHS are set out in 'East Lothian Local Housing Strategy 2018-23: Supporting Paper 1 – Consultation and Engagement', <a href="https://www.eastlothian.gov.uk/downloads/file/27332/proposed_supporting_paper_1_east_lothian_local_housing_strategy_2018-23_-_consultation_and_engagement">https://www.eastlothian.gov.uk/downloads/file/27332/proposed_supporting_paper_1_east_lothian_local_housing_strategy_2018-23 - consultation and engagement</a></p> <p>This evidences all feedback obtained through the formal LHS consultation process and how this has been used to influence the final LHS. Similarly, a large scale consultation event was held early November 2018 to inform the RRTP and findings have been considered and used to inform the RRTP. Comments are currently being collated and an attachment will be available setting out feedback as part of the final RRTP.</p>
Good practice guidelines	The RRTP is informed by Rapid Rehousing Transition Plan Guidance (2018) published by the Scottish Government.
Other (please specify)	N/A
Is any further information required? How will you gather this?	N/A

## 6. How does the policy meet the different needs of groups in the community?



<ul style="list-style-type: none"> <li>• Women, men and transgender people (includes issues relating to pregnancy and maternity)</li> <li>• Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems)</li> <li>• Minority ethnic people (includes Gypsy/Travellers, migrant workers, non-English speakers)</li> </ul>	<ul style="list-style-type: none"> <li>• Review protocol arrangements for young people leaving care to enable a planned approach</li> <li>• Scope the potential provision of a homeless assessment and advice service in HMYOI Polmont &amp; implement</li> </ul> <p>Research was previously carried out to inform the LHS 2012-17 on LGBT people and housing inequalities, which included consideration of homelessness issues. It is considered the findings of this research are relevant for the RRTTP and the study does not require to be updated.</p> <p>Some actions in the RRTTP are focussed on women i.e. Explore best practice models of accommodation for women presenting with co-occurring substance misuse complex mental health issues &amp; domestic abuse &amp; implement recommendations. It is acknowledged that there are no such actions for men and this needs to be addressed.</p> <p>A Housing Needs Assessment of People with Particular Needs was carried out in 2017/18 to inform the Local Housing Strategy which is the overarching strategy for housing, providing strategic context for Rapid Rehousing. It sets out the housing needs of people with a physical disability; people with a learning disability; people with autism and people with a mental health condition in some detail. All new build social rented housing is built to Housing for Varying Needs (HVN) Standard and any new supply in place to enable Rapid Rehousing will align with HVN.</p> <p>There are currently good links in place between the LHS and Health and Social Care Strategic Plan, via the Housing Contribution Statement. Building on this, a new Health and Social Care Strategic Plan requires to be in place by Spring 2019, with a Housing Contribution Statement as an integral part of this, which will include Rapid Rehousing, to ensure alignment across all strategies and plans. Within this, disabled homeless people including those with mental health conditions will be recognised and the implementation of Housing First will ensure that homeless people with a disability are not discriminated against and indeed benefit from a Rapid Rehousing approach.</p> <p>ODS Consulting was commissioned by Communities Scotland in 2007 to assess the housing needs of minority ethnic communities across six local authority areas including East Lothian. The study aimed to explore the housing circumstances, needs and preferences of minority ethnic communities, in accordance with Communities Scotland Guidance (2005). This detailed research is considered to remain relevant for the RRTTP, being updated i.e. with 2011 Census information.</p>
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<ul style="list-style-type: none"> <li>• Refugees and asylum seekers</li>   <li>• People with different religions or beliefs (includes people with no religion or belief)</li>   <li>• Lesbian, gay, bisexual and heterosexual people</li>   <li>• People who are unmarried, married or in a civil partnership</li> </ul>	<p>Ethnic minorities are four times more likely to live in overcrowded housing (and therefore be at risk of homelessness), with Polish, Bangladeshi and African people experiencing the highest levels of overcrowding (Source: 2011 Census). The LHS sets out the proposed delivery of a range of house sizes including larger house sizes, potentially suitable for ethnic minority families, which should have a positive impact upon homelessness in respect of minority ethnic people.</p> <p>The housing needs of refugees and asylum seekers has been considered at national level although no studies have been carried out in respect of refugees and asylum seekers and the homelessness experience. While Rapid Rehousing is considered likely to have a positive effect upon refugees in providing accommodation and intensive support as quickly as possible, it is recognised that it would be helpful to improve our understanding of housing need and the extent to which our approach is positive and could be improved.</p> <p>Research was carried out on different religions and housing to inform the East Lothian LHS 2012-17. It is not considered appropriate to repeat this study again although it is evident that knowledge of people with different religions or beliefs is limited. Work has been carried out recently with local churches to consider their potential involvement in alleviating homelessness and the RRTP includes an action to establish a starter pack scheme, optimising support from local churches, which would be utilised across the county. Rapid Rehousing, with an associated Housing First approach should ensure that people with different religions or beliefs are accommodated quickly with the appropriate supports in place, however the Council acknowledges that the experience of people with different religions and beliefs in respect of the homelessness process is not well understood. The Council will seek to improve the understanding of this and address any concerns. There could be merit in building on the Starter Pack Scheme and work with local churches to ensure that people with different religions or beliefs are not negatively impacted upon in any way through policies / procedures etc.</p> <p>Research was previously carried out to inform the LHS 2012-17 on LGBT people and housing inequalities, which included consideration of homelessness issues. It is considered the findings of this research are relevant for the RRTP and the study does not require to be updated.</p> <p>Homelessness data shows that one of the key reasons for homelessness is breakdown of a relationship and this will be positively addressed through Rapid Rehousing and Housing First i.e. through actions such as mediation and exploring flat-share arrangements for single people in temporary and / or permanent accommodation.</p>
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<p><b>Those vulnerable to falling into poverty</b></p> <ul style="list-style-type: none"> <li>• Unemployed</li> <li>• People on benefits</li> <li>• Single Parents and vulnerable families</li> <li>• Pensioners</li> <li>• Those living in the most deprived communities (bottom 20% SIMD areas)</li> <li>• Looked after children / Those leaving care settings (including children and young people and those with illness)</li> <li>• Homeless people</li> <li>• Carers (including young carers)</li> <li>• Those involved in the community justice system</li> <li>• Others e.g. veterans,</li> </ul>	<p>The RRTP is focussed on homeless people, who are typically more vulnerable to falling into poverty compared with the general population. While this is not the case for all homeless households, research shows a direct correlation between economic disadvantage / multiple deprivation and homelessness. In East Lothian there is an identified link between higher rates of homelessness per population in the more deprived west of the county and lower rates of homelessness per population in the more affluent east of the county. The RRTP seeks to reduce inequalities and includes a number of actions to mitigate against poverty and deprivation, recognising the links between ending homelessness and tackling poverty, particularly child poverty and the associated Delivery Plan.</p> <p>In relation to unemployed households, households on benefits and those living in the most deprived communities, the RRTP acknowledges that Welfare reform is further exacerbating inequalities, particularly in relation to Universal Credit. Issues also exist for people under age 35 in relation to single room rent regulations. The RRTP seeks to mitigate the impacts of Welfare Reform where appropriate / where possible and investigate alternative housing options i.e. flat sharing, build to rent and the Home and Belonging project. It includes actions to link to employability &amp; training services i.e. digital skills development &amp; pre-tenancy training</p> <p>The RRTP sets out an action to review again the existing protocol in respect of care experienced young people and includes an innovative proposed project to accommodate 36 care experienced young people alongside students from Queen Margaret University, providing an element of peer support, with all parties receiving support also from a housing support provider. It is anticipated this will provide additional housing options, with relatively inexpensive rents and a reduction in social isolation and tenancy failure for this vulnerable group, with assistance to save for future housing costs.</p> <p>The RRTP acknowledges that people involved in the community justice system, particularly people leaving prison are at high risk of homelessness and to mitigate this, a key action is to implement the SHORE standards to ensure suitable pathways for people leaving prison, alongside appropriate support provision. The RRTP also includes a proposal to establish a housing advice service at Polmont Young Offenders Institution to prevent homelessness.</p> <p>The RRTP acknowledges that veterans are at high risk of becoming homeless and are vulnerable to falling into poverty. To address this, six units of supported accommodation for veterans are proposed, which will also provide a potential base for further support for veterans.</p> <p>While it is widely acknowledged that there has been a significant amount of work carried out in relation to young homeless people in East Lothian, there remains a lack of services for young people with very complex needs,</p>
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	particularly with regard to accommodation with support. Young people are often required to go to Edinburgh for this, which is costly. A review of existing supported accommodation services has commenced, with recommendations to be taken forward as part of the RRTP and a further 4 units of supported accommodation will be developed in 2019.
<b>Geographical communities</b> <ul style="list-style-type: none"> <li>• Rural/ semi-rural communities</li> <li>• Urban Communities</li> <li>• Coastal communities</li> </ul>	The RRTP acknowledges the wider East Lothian context of relative affluence in the rural east of the county compared with relative deprivation in the urban west, although it is acknowledged there are small pockets of deprivation in the east. This correlates with higher levels of homelessness in the west per population and the corresponding higher demand for services. The RRTP takes cognisance of this in respect of new service development and new supply.

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

No

**8. 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?

The final RRTP will set out lead Council officers responsible for individual actions. However, where individual actions are carried out in part by contractors, this would be subject to procurement processes as appropriate. Commissioned contractors would require to tender for work and as part of this process, be able to demonstrate how equality and human rights considerations have been addressed.

**9. 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 RRTP will be available in different formats and languages upon request.

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

Objectives	Comments
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<b>Equality and Human rights</b>	
Promotes / advances equality of opportunity e.g. improves access to and quality of services, status	<p>The RRTP promotes equality of opportunity in numerous ways i.e. with a focus on preventing, reducing and alleviating homelessness, which includes consideration of access to services for homeless people, takes account of existing processes, policies and procedures and where these could be improved and generally improving the quality of life for people who become homeless.</p> <p>The RRTP seeks to advance equality of opportunity for a range of vulnerable groups i.e. care experienced young people, women experiencing domestic violence and veterans, recognising that their particular housing circumstances lend to inequalities. The RRTP includes an action plan, which sets out a wide range of actions to mitigate against identified inequalities.</p>
Promotes good relations within and between people with protected characteristics and tackles harassment	N/A
Promotes participation, inclusion, dignity and self-control over decisions	<p>Consultation and engagement on the wider LHS (which included homelessness) has promoted participation from stakeholders, service users and vulnerable groups, taking a co-production approach to developing the LHS where possible and the LHS aims to promote the dignity and inclusion of all groups; i.e. older people and housing health checks from age 55, to ensure older people can make their own housing related decisions where possible. A further example is covering community empowerment in relation to self-build and custom build.</p> <p>This approach is also reflected in the RRTP, with active service user participation in the large scale consultation event. Service users will actively shape the Care and Belonging Project and be consulted on in respect of key decisions going forward. The overall approach to service user consultation will be reviewed and improved during 2019/20.</p>
Builds family support networks, resilience and community capacity	The RRTP aims to build family support networks in respect of mediation for young people asked to leave the family home / threatened with homelessness. It aims to build resilience and community capacity to alleviate homelessness i.e. hosting communities.
Reduces crime and fear of crime	'Secured by Design' and 'Designing for Streets' standards for all new build housing developments will contribute towards a feeling of safety in respect of new supply and a Housing First approach will provide appropriate support for vulnerable households in permanent tenancies.

<p>Promotes healthier lifestyles including</p> <ul style="list-style-type: none"> <li>• diet and nutrition,</li> <li>• sexual health,</li> <li>• substance misuse</li> <li>• Exercise and physical activity.</li> <li>• Life-skills</li> </ul>	<p>The RRTP will seek to promote healthier lifestyles for homeless people, who are generally identified as having poor health relative to the general population. A reduction of temporary accommodation, rapid rehousing and reducing length of stay in temporary accommodation will promote positive mental health. The promotion of psychologically informed environments (PIE) in supported accommodation will also support positive mental health.</p>
<p><b>Environmental</b></p>	
<p>Reduce greenhouse gas (GHG) emissions in East Lothian (including carbon management)</p>	<p>The LHS recognises the importance of the need for ‘place-making’ in relation to new housing developments, particularly to ensure social inclusion of vulnerable groups i.e. homeless people. In accordance with Guidance, this RRTP will seek to ensure housing for homeless people is mainstream and located within existing communities where possible.</p> <p>The LHS aims to improve the physical environment of housing through increasing good quality, energy efficient housing stock, with appropriate green space, play areas for children etc. It includes reference to estate inspections, housing renewal areas etc. This is also applicable to Rapid Rehousing and homelessness, to promote tenancy sustainment.</p>
<p>Plan for future climate change</p>	
<p>Pollution: air/ water/ soil/ noise</p>	
<p>Protect coastal and inland waters</p>	
<p>Enhance biodiversity</p>	
<p>Encourage resource efficiency (energy, water, materials and minerals)</p>	
<p>Public Safety: Minimise waste generation/ infection control/ accidental injury /fire risk</p>	
<p>Reduce need to travel / promote sustainable forms or transport</p>	
<p>Improves the physical environment e.g. housing quality, public and green space</p>	
<p><b>Economic</b></p>	

Maximises income and /or reduces income inequality	The RRTP supports projects / organisations which help young people into positive destinations i.e. Bridges Project; Blue Triangle Housing Association and Action for Children. It includes actions such as 'link with employability & training services i.e. digital skills development & pre-tenancy training' and 'explore potential for increased numbers of vulnerable young people including care experienced young people to receive support to attain SQA's accredited Tenancy Award'.
Helps young people into positive destinations	
Supports local business	
Helps people to access jobs (both paid and unpaid)	The RRTP includes ambitious rehousing targets for homelessness and incorporates specific new supply affordable housing projects, which should increase employment in relation to lower paid jobs i.e. construction and reduce income inequality / boost the local economy. The RRTP also proposes new posts in relation to Housing First; empty homes and the private sector.
Improving literacy and numeracy	
Improves working conditions, including equal pay	With all contracted services undergoing a procurement process in relation to RRTP actions i.e. private sector leasing, this ensures good working conditions and supports the Living Wage.
Improves local employment opportunities	The RRTP includes ambitious rehousing targets for homelessness and targets for Housing First, which should increase employment in relation to lower paid jobs i.e. construction / support and reduce income inequality / boost the local economy.

### 11. Action Plan

Identified negative impact	Mitigating circumstances	Mitigating actions	Timeline	Responsible person
Welfare reform is having a negative impact upon a large number of vulnerable individuals. In particular, young people under age 35 face inequalities with regard to the single room rent regulations.	N/A	Mitigate Welfare Reform where appropriate / possible and explore housing options i.e. build to rent, flatshare etc.	March 2024	Nicky Sandford, Housing Strategy
The RRTP sets out a number of actions in relation to women and accompanying children experiencing domestic violence, however there are no similar actions included for men.	N/A	Review service provision	March 2024	Nicky Sandford, Housing Strategy
The RRTP focusses on homelessness i.e. increasing allocations to homeless households and targeting specific new supply projects at vulnerable groups. This is	N/A	Review allocations targets and re-evaluate the IIA on an annual basis to ensure negative impacts are minimised. Prepare	Ongoing	Nicky Sandford, Housing Strategy

likely to have a negative impact upon people with general needs, with no vulnerability.		a Local Investment Framework to ensure identified needs / competing priorities are considered and responded to appropriately, with new supply at local level focussed on targeted areas / households in need while also being mindful of longer term goals around sustainable communities.		
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Through annual reviews of the RRTP, ongoing monitoring of service delivery to equality groups will be carried out, outcomes for equality groups taken cognisance of and any issues addressed where the RRTP is not considered to be meeting the needs of equality groups.

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