

## Midlothian Council

# Wheelchair Accessible Housing Targets



### **Background information**

In March 2019, the Scottish Government issued a Guidance Note to Local Authorities on setting targets to support the delivery of wheelchair accessible housing. This Guidance Note<sup>1</sup> follows on from the action set out in the "A Fairer Scotland for Disabled People" delivery plan:

"To work with local authorities, disabled people and other stakeholders to ensure that each local authority sets a realistic target within its LHS for the delivery of wheelchair accessible housing across all tenures and report annually on progress".

It is a required action of the Midlothian Local Housing Strategy 2021-2026<sup>3</sup>.

The definition of 'wheelchair accessible housing' is contained within guidance note MHDGN 201902:

'the provision of targets to support the delivery of Wheelchair Accessible homes across all tenures means homes suitable for wheelchair users to live in and should as a minimum comply with the design criteria indicated as a 'basic' requirement for wheelchair users, as outlined in Housing for Varying Needs (HfVN) (column 'B' in 'Summary of Design Criteria'). as a minimum comply with the design criteria indicated as a 'basic' requirement for wheelchair users, as outlined in Housing for Varying Needs (HfVN) (column 'B' in 'Summary of Design Criteria').

Local authorities can choose to have a single target, setting out the requirement for housing across all tenures or can distinguish requirements by tenure and / or sub area where this can be evidenced.

The target(s) can be expressed as a number to be delivered over a period of time or as a percentage requirement of either the existing provision or as a percentage of all new housing provision within the area.

<sup>&</sup>lt;sup>1</sup> Wheelchair accessible housing target: guidance note: MHDGN 201902 - gov.scot (www.gov.scot)

<sup>&</sup>lt;sup>2</sup> https://www.gov.scot/publications/fairer-scotland-disabled-people-delivery-plan-2021-united-nations-convention/

<sup>&</sup>lt;sup>3</sup> Housing strategy and performance | Midlothian Local Housing Strategy 2021-2026

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### 1 Current Provision

- 1.1 Midlothian's Strategic Housing Investment Plan (SHIP) is an important document which sets out the strategic investment priorities for housing over a 5 year period, specifically affordable housing. The SHIP is updated annually with details of planned social housing new build sites. The most recent SHIP (2022/23-2026/27) highlights that there are currently 115 wheelchair accessible housing units either planned or in the process of being built between 2022 and 2027.
- 1.2 Table 1.1 below, shows existing Midlothian Council, Housing Association and charity organisation wheelchair accessible housing (in black) and planned/underway housing (in red)<sup>4</sup>.
- 1.3 The table illustrates that by the end of 2027, 66% of wheelchair accessible housing will have one bedroom, 20% will have two bedrooms, 6% will have three bedrooms and there will be 4% and 2% with four bedrooms and five or more bedrooms respectively. Furthermore, 76% (215) of wheelchair accessible social housing will be provided by Midlothian Council, 22% (61) will be Housing Association properties and the remaining 2% will be provided by charity organisations.
- 1.4 The highest number of wheelchair accessible homes will be in the Dalkeith area (68) followed by Bonnyrigg (65), Penicuik (45), Newtongrange (22) and Mayfield will have 20.

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<sup>&</sup>lt;sup>4</sup> As of May 2022

Table 1.1: Current and planned wheelchair accessible social housing in Midlothian

Area	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total by Area
Bilston		4 flats (Melville HA, unknown bedroom numbers, due 2026/27)		1 (Melville HA)		2022 = 1 2027 = 5
Bonnyrigg	8 (Chesters View, Midlothian Council)  1 (Castle Rock Edinvar HA)  39 (Midlothian Council, extra care flats due 2024)  1 (Midlothian Council, augmented flats due 2023)	6 (Chesters View, Midlothian Council)  1 (Castle Rock Edinvar HA)  7 (Midlothian Council, extra care flats due 2024)	(Burnbrae Road, Midlothian Council)      (Castle Rock Edinvar HA)			2022= 18 2024 = 65
Dalkeith	<ul> <li>supported flats due 2023)</li> <li>2 (Esk Place, Midlothian Council)</li> <li>5 (Castle Rock Edinvar HA)</li> <li>1 (Crystalmount retirement housing, Castle Rock Edinvar HA)</li> <li>40 (Midlothian Council, extra care flats, due February 2023)</li> </ul>	2 (Railway Cottages, Viewpoint HA)  5 (Castle Rock Edinvar HA)  8 (Midlothian Council, extra care bungalows, due February 2023)	1 (Salter's Road, Midlothian Council)	3 (1 x Salter's Road, 1 x Bill Russell Grove, Midlothian Council & 1 x Melville HA) 1 (Thera Trust)		2022 = 20 2023 = 68

Area	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total by Area
Danderhall	5 (Angres Court, Midlothian Council)	2 (Angres Court, Midlothian Council)				2022 = 7
Easthouses	9 (Easthouses Court, Midlothian Council)	<b>3</b> (Easthouses Court, Midlothian Council)				2022= 12
Gorebridge	1 (Castle Rock Edinvar HA)  10 (Midlothian Council, extra care bungalows, due 2023/24)	2 (Midlothian Council, extra care bungalows, due 2023/24)	1 (Robert Franks Avenue, Midlothian Council)	1 (Robert Franks Gardens, Midlothian Council)		2022 = 3 2024 = 15
Loanhead	1 (Hawthorn Gardens intermediate care, Trust HA)      1 (Castle Rock Edinvar HA)      12 (Canmore Court, amenity housing, Midlothian Council)		2 (Edgefield Court, Midlothian Council) 1 (Melville HA)	1 (Academy Court, Midlothian Council)		2022= 18
Mayfield	1 (Salisbury View, retirement housing, Castle Rock Edinvar HA)  2 (Castle Rock Edinvar HA)	1 (Salisbury View, retirement housing, Castle Rock Edinvar HA) 3 (Melville HA) 1 (Thera Trust)	(Westhouses Road, Midlothian Council)      (Melville HA)      (Castle Rock Edinvar HA)      (Melville HA bungalows, unknown bedroom numbers, due 2024/25)	3 (Melville HA)  1 (Blackcot Road, Midlothian Council)	2 (Melville HA)	2022= 18 2025= 20

Area	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total by Area
Newtongrange	7 (Deanpark Court, Midlothian Council)	2 (Deanpark Court, Midlothian Council)	1 (Redwoods Caring Foundation)		1 (Redwoods Caring Foundation)	2022 = 21
	1 (St Anne's retirement housing, Castle Rock Edinvar HA)	4 (Castle Rock Edinvar HA) 2 (Thera Trust)	1 (Midlothian Council, due 2022)		, sandanony	End of 2022 = 22
	3 (Castle Rock Edinvar HA)					
Pathhead	2 (Castle Rock Edinvar HA)					2022 = 2
Penicuik	28 (Cowan Court extra care flats, Midlothian Council)  1 (retirement housing, Castle Rock Edinvar HA)	4 (Vaucluse Place, Blackwood Homes)  4 (Cowan Court extra care flats, Midlothian Council)	1 (Pavilion Court, Midlothian Council)	1 (Eastfield Farm Road, Midlothian Council)	2 (Pentland Way, Midlothian Council)	
	2 (Teviot Court complex care housing, Midlothian Council)					2022=45
Poltonhall	2 (Castle Rock Edinvar HA)		1 (Andy Kelly View,		1 (Royal	
			Midlothian Council)  1 (Melville HA)		Scots Medway, Midlothian Council)	2022= 3
Rosewell			1 (Melville HA bungalow, unknown no. of bedrooms, due		1 (Thera Trust)	2022 = 1 2025 = 2
Roslin	1 (Ross Glen Court retirement housing, Castle Rock Edinvar HA)		2024/25)			2022= 1

Area	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total by Area
Total by Property Size	2022= 96 End of 2022 = 136 End of SHIP period (2027) = 186	2022 = 40 End of 2022 = 48 End of SHIP period (2027) = 57	2022 = 15 End of 2022 = 16 End of SHIP period (2027) = 16	2022= 12 End of SHIP period (2027) = 12	2022 = 7 End of SHIP period (2027) = 7	Total no. of properties 2022= 170 End of 2022 = 258 End of SHIP period (2027) = 283 (7 properties do not have a confirmed no. of bedrooms)

### 2. Midlothian Local Development Plan

- 2.1 The current Midlothian Local Development Plan<sup>5</sup> (2017) sets an affordable housing requirement. In principle, the Council will consider provision of specialist housing as contributing towards the affordable housing requirement (paragraph 3.2.5).
- 2.2 Midlothian Council is preparing a new local development plan for Midlothian. It is expected to be in place by 2026. The Council will develop the approach of the adopted plan, so that the affordable housing policy is sufficiently detailed and specific to support delivery of the wheelchair accessible housing targets.

### 3. Unmet need

3.1 Midlothian Council's Occupational Therapy Service work with adults, older people and children who have a physical, mental or learning disability, are frail or unable to manage activities of daily living, and their carers. The service helps people to remain independent in the community which may be required on a temporary basis or as a more permanent solution to long-standing difficulties. The type of help provided ranges from simple requests for information, equipment, minor adaptations to more major adaptations. The service works with people regardless of tenure type e.g. owner occupiers, Midlothian Council tenants etc. Chart 3.1 below, illustrates the current tenure of Occupational Therapy Service clients who require the use of a wheelchair and who are inappropriately housed. It should be noted that the clients live in towns and villages across the Midlothian area.

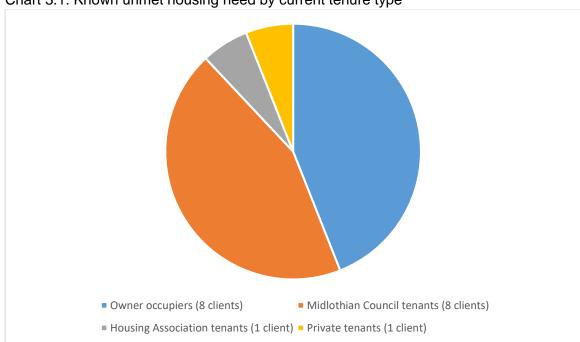


Chart 3.1: Known unmet housing need by current tenure type

3.2 It is clear from chart 3.1 that properties of different sizes and tenures are required across Midlothian.

<sup>&</sup>lt;sup>5</sup> The current development plan for Midlothian | Development plans and policies | Midlothian Council

3.3 It should be noted that these findings are limited given low client numbers and the knowledge that many wheelchair users in Midlothian don't require the Occupational Therapy Service and their needs are therefore unknown. The results of the wheelchair accessible housing consultation, below, contains further information on current need.



### 4. Consultation

4.1 Our public consultation was carried out between Monday 28 February and Friday 25 March 2022. Midlothian residents were asked to complete an online survey and if interested, attend online Microsoft Teams or Zoom discussion sessions. Paper copies were available to those who requested them and were made available in libraries and leisure centres.

### Discussion sessions were held on:

- Tuesday 22 February 2022, 10am-11am
- Wednesday 23 February 2022, 12:30pm-13:30pm
- Thursday 24 February 2022, 11am-12noon
- Monday 28 February 2022, 10am-11am
- Wednesday 2 March 2022, 12:30pm-13:30pm
- 4.2 105 residents completed the online survey and four residents attended the discussion sessions.

### 5. Consultation results

### Profile of Respondents

Residents were asked for their current postcode. 30% of respondents were from the Bonnyrigg/Lasswade area, 29% were from the Dalkeith area, 11% were from the Penicuik area and 10% were from the Gorebridge area. The remaining 21% of responses is comprised of small numbers of residents from Lasswade, Loanhead, Rosewell and Roslin. Two responses were from out with Midlothian.

In terms of their current house type, the majority (67%) stated they lived in houses. Just 13% stay in flats and single storey/bungalows respectively and 7% live in four in a block properties.

Table 5.1

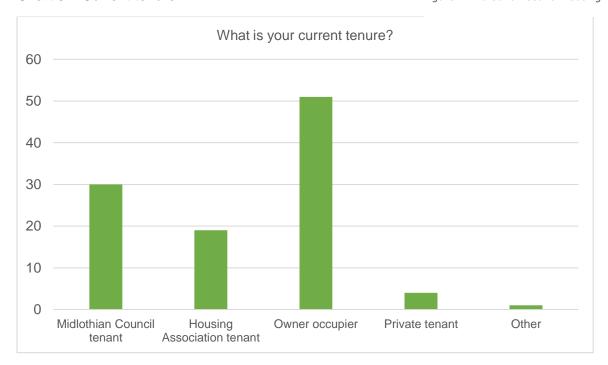
Current house type	No. of responses
House	70
Flat	14
Single storey/bungalow	14
Four in a block	7
Other	0

In addition, 49% of respondents were owner occupiers, 29% were Midlothian Council tenants, 18% were Housing Association tenants, 4% were private sector tenants and 1% were living with parents.

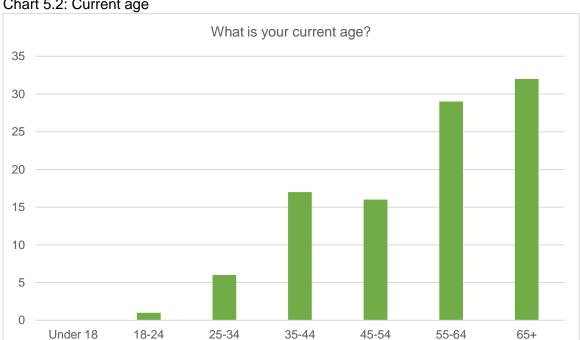


Chart 5.1 Current tenure

Figure 1: Midlothian Council housing in Dalkeith



Finally, residents were asked for their current age. 32% were 65 years old and above, 29% were aged between 55 and 64, 17% were aged between 35 and 44, 16% were aged between 45 and 54, 6% were aged between 25 and 34 and 1% were aged between 18 and 24 years old. No respondents were under 18 years old.



### Chart 5.2: Current age

### Accessibility of Housing

Residents were asked if they, or anyone living with them, currently require the use of a wheelchair. The responses were split evenly with 50% answering yes and 50% answering no.

In relation to the accessibility of their current home, 48% of respondents answered that their homes are partly accessible, 39% reported that their homes are very accessible and 14% stated that their homes are not accessible.

Is your home currently accessible for everyone in your household?

50

40

30

20

Very accessible Partly accessible Not accessible

Chart 5.3: Current home accessible

Residents were asked whether there is anything in their current homes which limits their household's day to day activities. Respondents were able to choose multiple answers. Out of the 97 responses received the most common issues were steps outside of home (24%), the design/layout of their homes (11%), internal steps (10%), difficult to access bath/shower (9%) and 8% reported that their doors are too narrow. Of the remaining restrictions, between 5% and 2% of respondents reported issues with them.

Table 5.2: Is there anything about your current home which limits your household's day to day activities?

Restriction	No. of responses
Steps inside of home	10
Steps outside of home	23
Restricted movement due to design/layout of home	11
Doors too narrow	8
Rooms too small	5
Bath/shower difficult to access/use	9
Toilet difficult to access/use	4
Electric lights/sockets are difficult to reach	2
Heating controls are difficult to reach	3
Can't open windows	2
Difficulty answering door	3
Kitchen cupboards/shelves are difficult to	5
reach	
Cooker hob/oven is difficult to reach	4
Can't access garden	2
Can't use garden due to its layout	4

Can't access local amenities (public	2
transport/GP/shops etc.)	

Residents were asked whether someone using a wheelchair could visit their home (access the property and move around without difficulty). 67% of respondents reported that this wouldn't be possible whereas 33% believe a wheelchair user could visit and access their properties without difficulty.



Residents were asked whether their homes had been adapted to make it accessible for their household. 51% of households have not had adaptations carried out, 35% reported that their homes have been partly adapted and 14% have had adaptations carried out which have made their homes accessible.

Table 5.3: Has your home been adapted to make it more accessible for you/your household?

Have adaptations been carried out?	No. of responses
Yes	14
Yes – partly	34
No	50

# Sample of adaptations detailed in comments: 'When my daughter who had a stroke lived with us we had down stair shower and toilet put in as she could not get in out of bath' 'I had a ramp installed myself and have had to build an extension' 'Stair lift, wet room, ramp' 'Stair lift inside. Shower chair. Outside graded steps but no good for wheelchair' 'Extra railing on the stairs, shower' 'Bathroom has been adapted' 'Widening of some doorways and wet room installed' 'Walk in shower'

'Internal doors - have had the lower threshold lowered'

'Ground floor bedroom, wet room'

'High sockets. Partial walk in shower'

'Stair lift, toilet frames and shower stool, perching stool, hand rail outside'

Residents were asked how many bedrooms their current home has. 35% of respondents have 2 bedroom and 3 bedroom properties respectively, 15% have 4 bedrooms, 11% have one bedroom and the remaining 3% have 5 bedrooms or more.

Table 5.4

No. of bedrooms	No. of responses
1	12
2	37
3	37
4	16
5+	3

The majority of respondents (75%) reported that the number of bedrooms is right for their household, with 14% stating they have too few bedrooms and the remaining 11% reported having too many bedrooms.

One respondent highlighted that the number of bedrooms was sufficient unless a full time carer was needed. Another stated that their third bedroom was needed for the storage of their disabled son's equipment.

### **Future Housing Needs**

Residents were asked whether they knew of any changes to their mobility which would require the use of a wheelchair in the future. 61% do not know of any changes whereas 39% are aware that they will require the use of a wheelchair in the future. Comments highlighted a number of respondents with degenerative conditions such as MS and auto immune illnesses which made future wheelchair use a possibility.

Table 5.5

Do you know of any changes to your mobility which will require the use of a wheelchair in the future?	No. of responses
Yes	37
No	58

Residents were asked when considering their future housing needs, which area of Midlothian they would choose to stay in. 25% of respondents would choose to stay in Bonnyrigg in the future, 15% would choose Dalkeith, 12% would choose Penicuik and 11% would like to stay in Gorebridge. Of the remaining areas, between 8% and 1% would opt to live in them.

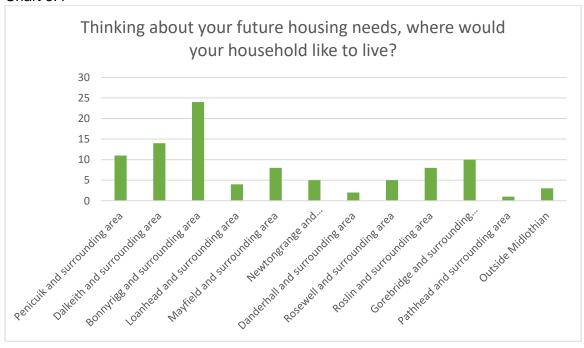
It is of note that 30% of respondents were from the Bonnyrigg/Lasswade area and 29% were from Dalkeith which shows that small numbers of residents would choose to live elsewhere if given the option. The statistics show support for small numbers of wheelchair accessible homes in the smaller



Figure 2: Midlothian Council housing in Bonnyrigg

villages and towns and larger numbers of wheelchair accessible housing in the larger towns such as Bonnyrigg, Dalkeith, Penicuik and Gorebridge.

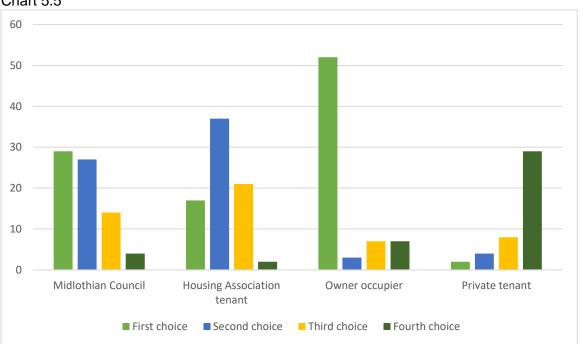
Chart 5.4



Respondents were asked to consider their future housing needs and choose their preferred tenure (and rank their choices in order of first choice, second choice etc.). When considering the first choice findings 52% of respondents would opt for home ownership, 29% would choose to be Midlothian Council tenants, 17% would choose to be housing association tenants and just 2% would like to be private sector tenants. As a second choice 52% would choose to be housing association tenants, 38% would choose to be Midlothian Council tenants with very small numbers opting for owner occupancy and private rented tenancies.

It is of note that these statistics, when viewed in context with the current home tenure details earlier, show that very few people wish to change their tenure in the future and that approximately half of all requirements will emerge from owner occupiers.

Chart 5.5



In their comments, respondents stated that the reasons for this were a mix of financial (cannot afford to buy a home or cannot access a mortgage) and security (wishing for security of tenure; the need for adaptations and repairs to their homes)

'I am happy being a tenant with Bield Housing. Main reason feeling safe and secure in my building. No worries about repairs etc. Everything I need is here for me'

> 'Security though ongoing repair and maintenance is an issue - care and repair service in Midlothian would be a help'

'For security of tenancy. I am terrified my private landlord will sell this property and I will be homeless'

> 'I like to have my own home and know that I am paying my mortgage in order that I will one day own the property to help support my daughter when she is older'

"I would prefer to stay where I currently live and have the ramp I need for access. It's been a long time now since applying for help with a grant - too long. I haven't been able to leave my home for a fortnight due to my husband's ill health to put the portable ramp down for me. As it is, it isn't even one I could drive my chair down. This needs improving in the length of time it takes to obtain help'

'I'm not fit to take care of any adjustments needed for my house'

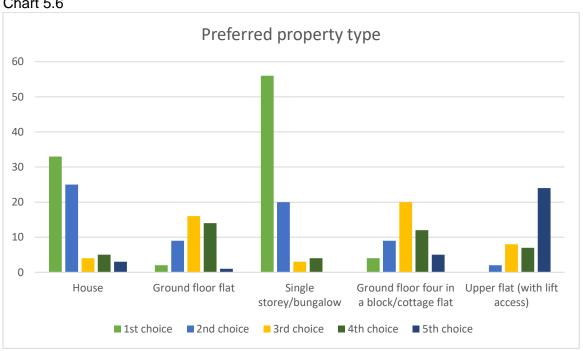
'We would love to have the opportunity to buy our home as it is designed for a wheelchair user. However if the wheelchair user passed away I would need to move out. Lack of suitable affordable housing for disabled people means lack of opportunity'

"I would much prefer to stay in my own home and if need be have things adapted in order I can

Residents were asked to consider their future housing needs and choose their preferred type of home (and rank in order of first choice, second choice etc.). 59% of respondents chose a single storey/bungalow as their first choice, 35% chose a house, 4% chose a ground floor four in a block/cottage flat, 2% chose a ground floor flat and no-one chose an upper flat (with lift access). As a second choice 38% would choose a house, 31% would choose a single storey/bungalow, 14% chose ground floor flats and ground floor four in a block/cottage flats and 3% chose an upper flat.

It is significant to note that whilst 81% of respondents currently live in either houses or single storey/bungalows; 94% of respondents would choose to live in these property types in the future.

Chart 5.6



Residents were asked if they had any comments they would like to make about wheelchair accessible housing in Midlothian. The comments contained a mixture of different points including the importance of wheelchair/equipment storage, parking, the lack of affordable market homes and the necessity of having wheelchair users on planning committees.

'My daughter has a disability and needs a wheelchair from time to time, she is in a private let and only went for the house she's in because she could access the shower on her own, not for the house or the area'

'Would like to see new housing by private builders to build more bungalows, like how there is affordable housing. There should be so many bungalows included too'

'There is not enough / any new build houses on one storey / new bungalows being built. Currently, for the size of bungalow my family need, it is so expensive to buy or the bungalows need a lot of work done to them as they are very dated. Please build some new build bungalows for house owners to buy!'

'Being disabled and owning home - spent £25,000 to convert for wheelchair. Makes you think about people who couldn't afford to do this and how restricting life in a wheelchair is'

'Space is needed to store the wheelchair when not in use'

'Parking access is vital to any person with a disability, whether a wheelchair user or not Please add this to your deliberations'

'All homes should have doorways wide enough to accommodate a wheelchair. Floorplans should be logical where movement within the home is with ease. Downstairs WC/bathroom should be compulsory'

'Most new built areas have had very little or no disabled properties available to me, while there is a demand for larger houses I can't move as nowhere is suitable for me'

### 6. Online chats

- 6.1 Interested residents were asked to join online chat sessions with staff from Housing, Planning and the Health and Social Care Partnership. The sessions allowed a greater understanding of the accessibility issues wheelchair users face, informative discussions around private development restrictions and the opportunity to consider issues not included in the survey.
- 6.2 Four residents attended the sessions and the following points were noted:

'Midlothian Council installed ramps are hideous and highlight the disability.'

'Through floor lifts are expensive and take up lots of space.'

'Priority areas for future housing should be in areas where the Council knows the families are' 'All new builds should have wide doors so wheelchair users can visit others. No steps if possible. Right angle turns (in wheelchairs) are very difficult. '

'Wheelchair accessible housing should have flat surfaces everywhere. No carpets as they make manoeuvring difficult. Ramp inclines can be steep. You have to think flat, wide doorways with open spaces.'

'Wherever these houses are built in Midlothian, there will be a demand.'

- 7. Setting a Wheelchair Accessible Housing Target
- 7.1 To enhance the supply of wheelchair accessible housing, Midlothian Council can choose to have a single target, setting out the requirement for housing across all tenures or can distinguish requirements by tenure and / or sub area. The target(s) can be expressed as a number to be delivered over a period of time or as a percentage requirement of either the existing provision or as a percentage of all new housing provision within the area.

### Tenure

7.2 The consultation found that 52% of respondents would choose to buy their own home whereas 46% would choose social rented housing.

### Sub area

7.3 There is evidence to suggest that wheelchair accessible targets could be set by sub area. 25% of respondents would choose to live in the Bonnyrigg area with 15% opting for Dalkeith, 12% wishing to live in Penicuik and 11% opting for Gorebridge.

There is also evidence to suggest that small numbers of wheelchair accessible homes are required in the smaller towns in Midlothian.

### Future need

- 7.4 The evidence collated found that 50% of respondents (and/or their household members) currently require the use of a wheelchair and 50% do not. The percentage of households who know they will require the use of a wheelchair in the future sits at 39%.
- 7.5 Table 7.1 below combines the data from respondents who currently require the use of a wheelchair with those who foresee needing one in the future. Both percentages and numbers have been provided in order to enable the wheelchair accessible targets to be set.

Table 7.1

	No. of respondents	% of respondents
Household currently requires the use of a	50	50%
wheelchair		
Household is aware of changes to mobility	37	39%
which will require the use of a wheelchair in		
the future		
Total	87	88% <sup>6</sup>

- 7.6 The wheelchair accessible housing targets will cover the five year period from 2022/23 2027/28. If the targets were restricted to responses received for the consultation, there is evidence to suggest that building 17 homes per annum over the next five years would satisfy current and known foreseeable need<sup>7</sup>. This does not include the unknown e.g. families moving into Midlothian, life changing accidents, Midlothian residents who did not take part in the consultation etc. Further evidence from the consultation suggests that 52% of these should be built by the private sector.
- 7.7 Setting a wheelchair accessible housing target of 20 per annum for the next five years would be a realistic target to address current and potential future shortfalls in the provision of wheelchair accessible homes. It is suggested that 10 will be social housing delivered by Midlothian Council/RSL partners and 10 should be provided by private sector developers.
- 7.8 In order to address constraints within the private sector the wheelchair accessible housing target will be set over the five year period and therefore 100 homes will be built between 2022/23 and 2027/28.
- 7.9 This target will be examined at the end of the 5 year period in order to account for Midlothian's growth and ageing population.
- 7.10 The Midlothian Strategic Housing Investment Plan 2022/23-2026/27 contains details of 115 social housing units which are either planned or in the process of being built between 2022 and 2027.

<sup>&</sup>lt;sup>6</sup> Average total respondent number used (98.5) due to differing respondent numbers and percentages in questions 5 and 12

<sup>&</sup>lt;sup>7</sup> 87 divided by 5

- 7.11 In order to assist with the development of wheelchair accessible homes in the private sector, Midlothian Council's Planning Department propose using the second Local Development Plan to allocate sites and contain policy provision to meet the Wheelchair Accessible Housing Target.
- 7.12 Further governance from the Scottish Government may be required to assist with the development of wheelchair accessible homes in the private sector.
- 7.12 It should be noted that there are additional actions Midlothian Council can employ in order to make best use of existing wheelchair accessible and adapted housing stock across all tenures. The proposed actions cover adaptations of existing homes, personal needs assessments, information and advice, education, RSL allocations and development of an evidence base in order to inform future wheelchair accessible targets. It is proposed that these actions will be consolidated within the LHS 2021-26 action plan, and will be reported annually to Council as part of the existing LHS monitoring, implementation, and reporting process.