

Integrated Impact Assessment (IIA)

Please refer to the Integrated Impact Assessment (IIA) Guidance when completing this form.

Basic Details

1. Title of proposal (include budget reference if applicable)

Midlothian Strategic Housing Investment Plan 2027/28 – 2031/32

2. Service(s)

Place

3. Lead officer (name, job title and date of IIA training)

Kevin Divin, Programme Manager, 6th May 2026

4. Other officers/partners involved (name, job title and date of IIA training)

Fiona Clandillon – Head of Development
Lesley Connell - Housing Strategy Officer

5. Date IIA completed

21/08/2026

6. Nature of proposal

Technical, progress or procedural report

Other (please specify)

7. Brief description of proposal

What are its main aims and objectives? What, if anything, will change as a result of this proposal?

Midlothian Council's Strategic Housing Investment Plan (SHIP) 2026/27–2030/31 sets out the Council's priorities and investment programme for the delivery of affordable housing across Midlothian over a five-year period.

The SHIP identifies the Council's priorities for investment in new and improved affordable housing and provides the strategic framework for working with Registered Social Landlords, developers and other partners to maximise the delivery of affordable homes.

The Plan considers housing need and demand across Midlothian and identifies projects and programmes for potential investment, including new build, acquisition and other forms of affordable housing provision. It seeks to support the delivery of high-quality, energy-efficient and accessible homes, while contributing to wider Council priorities including reducing housing inequality, tackling homelessness, supporting sustainable communities and addressing climate change.

The SHIP is a strategic investment plan rather than an approval for every individual project identified within it. Individual developments and investment proposals will remain subject to the appropriate Council and partner approvals, funding availability, business cases, planning requirements and other relevant statutory processes.

The SHIP will be reviewed and updated annually to reflect changes in housing need, project progress, funding availability, development costs and emerging strategic priorities.

Equality and Rights

8. Could the proposal have an impact on any of the following groups with protected characteristics under the Equality Act 2010? (select all that apply)

Protected characteristics	
<u>Age</u> (older people, young people and children)	☒
<u>Disability</u> (people with disabilities)	☒
<u>Gender reassignment</u> (trans people, anyone whose gender identity differs from their sex assigned at birth)	☐
<u>Marriage and civil partnership</u> (people who are married or in a civil partnership)	☐
<u>Pregnancy and maternity</u> (women who are pregnant and/or on maternity leave)	☒
<u>Race</u> (people defined by their colour, ethnicity or nationality – e.g. Asian and black people)	☒
<u>Religion and belief</u> (people with different religions and beliefs, including no belief)	☐
<u>Sex</u> (men or women)	☐
<u>Sexual orientation</u> (lesbian, gay, bisexual, heterosexual/straight)	☐

9. Could the proposal have an impact on children and young people under the age of 18?

Yes

10. Could the proposal have an impact on human rights?

See pages 14-15 of the IIA Guidance.

Yes

11. Is the proposal a 'strategic decision' under the Fairer Scotland Duty to actively consider how to reduce socio-economic disadvantage (i.e. poverty)?

Please select from the list below. The proposal is strategic if it falls under any of the headings.

Plans for housing development

Yes



No ☐

Don't know ☐

If you answered yes to any of questions 8-11, you must also answer questions 12-15.

If you were unsure about any of questions 8-11, it is advised that you answer questions 12-15.

If you answered no to all of questions 8-11, please advance to **question 16 (Environment)**.

Equality and Rights

12. What kind of impact could the proposal have on groups with protected characteristics under the Equality Act? (please explain your answers)

Protected characteristic	Potential impact	Explanation
Age	Positive	Midlothian's rapidly aging population requires specialised housing. The SHIP funds adaptable amenity housing and cottage flats to allow older residents to safely downsize within their communities. Concurrently, increasing the volume of affordable social rentals provides long-term housing security for young adults and families priced out of the private rental sector.
Disability	Positive	There is an acute shortage of homes suited for physical and cognitive impairments. The SHIP addresses this by enforcing strict Wheelchair Accessible Housing Targets across all new-build developments. Capital spend is actively directed toward bespoke, adapted, and specialist builds, enabling independent living and reducing delayed hospital discharges.
Gender reassignment	Positive	Transgender individuals face disproportionately higher risks of social isolation, discrimination, and hidden homelessness. The provision of secure, regulated social housing through Midlothian Council and its RSL partners eliminates bias often encountered in the private sector, offering a safe, inclusive, and legally secure environment.
Marriage and civil partnership	Positive	The SHIP has a baseline positive impact by ensuring equal, non-discriminatory access to housing options. Midlothian's allocation policies treat married couples, civil partners, and cohabiting couples identically, ensuring seamless access to joint social tenancies and legal security of tenure.
Pregnancy and maternity	Positive	Expanding families face sudden overcrowding and financial strain during maternity phases. The SHIP prioritises larger multi-bedroom properties and utilises the Open Market Purchase Scheme to acquire family homes. Furthermore, high energy-

Protected characteristic	Potential impact	Explanation
		efficiency standards protect new mothers and infants from the health risks of fuel poverty and dampness.
Race	Positive	Evidence from the South-East Scotland Housing Need and Demand Assessment (HNDA3) shows that minority ethnic households experience higher rates of overcrowding. The SHIP expands multi-bedroom social housing to mitigate this disparity. It also secures capital funding specifically for the maintenance and structural improvement of local Gypsy/Traveller sites.
Religion or belief	Neutral	The SHIP applies an open, non-discriminatory asset-distribution model across Midlothian. Distributing affordable housing developments across diverse geographic areas avoids economic or cultural segregation, ensuring that residents of all faith backgrounds have equal access to high-quality housing.
Sex	Positive	Women face structural economic inequalities, earning less on average and heading the vast majority of single-parent households. Affordable social rents directly reduce this gendered poverty premium. Additionally, the SHIP provides the essential permanent housing stock required to deliver the local Rapid Rehousing Transition Plan (RRTP), which critically supports women fleeing domestic abuse.
Sexual orientation	Neutral	LGBTQ+ individuals experience elevated rates of familial rejection, leading to higher instances of youth homelessness. Expanding the availability of social housing, backed by a regulated and fair allocation system, ensures vulnerable individuals have immediate, non-discriminatory access to safe and secure tenancies..

Equality and Rights

13. What kind of impact could the proposal have on children and young people in terms of the requirements of the [UNCRC \(Scotland\) \(Incorporation\) Act 2023](#)?

A full list of the UNCRC Articles can be found on pages 12-13 of the IIA Guidance.

UNCRC Article	Particular groups of children affected	Potential impact	Explanation
Article 3 (best interests of the child)	- All children under 18 across Midlothian. - Children in	Positive	The UNCRC Act mandates that the best interests of children must be a primary consideration in public expenditure. The SHIP

	households experiencing acute economic crisis.		progresses this by aligning capital resources with local Child Poverty Action Plans, ensuring that the expansion of affordable tenures prioritises stable, healthy home environments for low-income families.
Article 6 (life, survival and development)	• Infants and toddlers vulnerable to poor environmental health. • Children in overcrowded housing.	Positive	A child's physical and cognitive development is directly dependent on the standard of their physical environment. By constructing energy-efficient social housing that complies with modern ventilation and zero-emission heating mandates, the SHIP protects children from the developmental health hazards of damp, structural mould, and fuel poverty.
Article 12 (respect for the views of the child)	• Young people under 18. • Care-experienced youth transitioning to early tenancies.	Positive	While the SHIP operates at a strategic planning level, its investment framework is legally steered by the wider Midlothian Local Housing Strategy (LHS). The LHS incorporates public consultations that gather input from young residents and youth advocacy boards regarding community design, safety, and active play spaces.
Article 19 (protection from violence, abuse and neglect)	• Children fleeing domestic abuse. • Children at risk of hidden neglect due to severe overcrowding or homelessness.	Positive	This article requires the state to protect children from all forms of physical or mental violence, injury, abuse, or neglect while in the care of parents or guardians. The SHIP directly supports this protection by funding permanent, secure social housing required to deliver Midlothian's Rapid Rehousing Transition Plan (RRTP). By providing immediate, safe, and confidential alternative accommodation pipelines, the plan allows families with children to permanently escape domestic abuse environments. Furthermore, increasing the supply of high-quality family homes removes children from the hidden neglect associated with unsafe, cold, or deeply overcrowded private spaces, establishing a secure physical foundation for child protection interventions.

Article 23 (children with a disability)	• Disabled children and young people. • Neurodivergent children requiring sensory.	Positive	Disabled children have a right to enjoy a full and decent life in conditions that ensure dignity and promote self-reliance. The SHIP progresses this right by enforcing strict Wheelchair Accessible Housing Targets across all new-build footprints, allocating capital specifically for ground-floor layouts and bespoke structural adaptations.
Article 27 (adequate standard of living)	• Homeless children. • Children residing in temporary accommodation or B&Bs.	Positive	This is the most directly impacted article. Children have a fundamental right to a standard of living adequate for their physical, mental, spiritual, and social development. The SHIP actively expands permanent social housing stocks to directly support the local Rapid Rehousing Transition Plan (RRTP), systematically reducing a child's duration of stay in unstable temporary accommodation.
Article 29 (goals of education)	• School-aged children under 18. • Children from socio-economically disadvantaged families. • Neurodivergent or disabled children.	Positive	This article mandates that a child's education must develop their personality, talents, mental and physical abilities to their fullest potential, while fostering respect for the environment. The SHIP actively underpins this goal by providing the stable, high-quality home environments necessary for children to engage fully with their education outside the classroom. Delivering quiet, energy-efficient, and uncrowded living spaces directly improves a child's capacity to complete homework, study, and rest. Furthermore, building new homes to strict green energy-efficiency and zero-emission heating standards provides young residents with a tangible, everyday experience of sustainable living, directly reinforcing the environmental respect mandated by Article 29.
Article 31 (leisure, play and culture)	• All children and young people under 18. • Children residing in high-density	Positive	This article recognises the right of the child to rest, leisure, play, and recreational activities appropriate to their age. The SHIP directly supports this by

	urban developments. • Disabled children requiring accessible outdoor play spaces.		ensuring that all new-build affordable housing developments are planned alongside Midlothian's open space and green infrastructure standards. New housing footprints are actively integrated with safe active travel links, dedicated green corridors, and accessible communal play areas. Additionally, by delivering larger family homes with private or shared garden spaces, the SHIP directly provides young children with a safe, immediate physical environment for spontaneous play, which is critical for their physical and mental well-being.
Other (please specify): Children from disadvantaged households (Cross-cutting thematic impact across all articles)	• Children living in relative child poverty (after housing costs). • Children in workless or low-income households. • Care-experienced children and young people.	Positive	Children in disadvantaged households face compounded barriers to health, education, and social mobility. High private sector rents frequently deplete the household income available for food, clothing, and extracurricular development. The SHIP directly counteracts this structural disadvantage by massively expanding the supply of deeply subsidised social tenures. This intervention permanently reduces the housing cost burden on low-income families, effectively increasing disposable household income and lifting children out of relative poverty. Furthermore, the SHIP's emphasis on high energy-efficiency and zero-carbon heating protects these specific children from the disproportionate impact of fuel poverty, ensuring their families do not have to choose between heating their home or buying food.

Equality and Rights

14. What kind of impact could the proposal have in terms of the Articles of the European Convention on Human Rights (ECHR)?

See pages 14-15 of the IIA Guidance.

Article of ECHR	Particular groups of people affected	Potential impact	Explanation
Article 3 (Prohibition of inhuman or degrading treatment)	• Homeless individuals and families. • Households living in severely substandard, damp, or mould-infested properties.	Positive	Living in squalid, structurally unsafe, or chronically damp conditions that severely damage physical and mental health can cross the threshold of degrading treatment. The SHIP prevents this by delivering high-quality, modern social housing that complies with strict building standards. It expands the housing stock necessary to support the local Rapid Rehousing Transition Plan (RRTP), systematically removing vulnerable individuals from inadequate conditions and prolonged stays in temporary accommodation.
Article 8 (Right to respect for private and family life)	• Families living in severely overcrowded conditions. • Care-experienced individuals. • Vulnerable adults needing community-based independent living.	Positive	Severe overcrowding, frequent forced moves, and a lack of secure tenure directly disrupt stable family life and violate personal privacy. The SHIP directly promotes Article 8 by investing in multi-bedroom social housing and executing the Open Market Purchase Scheme to alleviate overcrowding. Providing long-term security of tenure establishes a stable, private environment where families can live with dignity without the constant threat of arbitrary eviction.
Article 14 (Prohibition of discrimination)	• Older people. • Disabled individuals. • Minority ethnic groups and	Positive	This article requires that all convention rights must be secured without discrimination. The SHIP is inherently designed to combat systemic housing

	Gypsy/Traveller communities.		inequalities by targeting public funds at groups facing the highest barriers. It does this by enforcing strict Wheelchair Accessible Housing Targets across new builds to protect disabled residents, and by allocating capital resources for the structural improvement of local Gypsy/Traveller sites.
Protocol 1, Article 1 (Protection of property / Peaceful enjoyment of possessions)	• Social housing tenants. • Low-income households facing high energy costs.	Positive	A person's home is a fundamental possession. While this article typically covers ownership, the right to peacefully enjoy one's home environment is severely undermined by fuel poverty and the inability to afford basic utility services. The SHIP builds all new properties to strict energy-efficiency and low-carbon standards, protecting tenants' budgets and ensuring they can peacefully and comfortably inhabit their homes without financial distress.
Protocol 1, Article 2(Right to education)	• School-aged children. • Disadvantaged families vulnerable to mid-term evictions.	Positive	Homelessness and housing insecurity within the private rental sector force frequent, disruptive residential moves that break educational continuity for children. By expanding permanent social housing, the SHIP ensures families remain securely embedded within their local school catchments. Furthermore, individual housing site developments are actively vetted alongside education departments to safeguard local school capacity.

15. What kind of impact could the proposal have on people experiencing or vulnerable to socio-economic disadvantage (i.e. poverty)?

An explanation of the different features of socio-economic disadvantage and information on vulnerable population groups can be found on page 18 of the IIA Guidance.

Socio-economic disadvantage	Potential impact	Explanation
Low income	Positive	Private rental sector costs in Midlothian place an unsustainable financial burden on low-income households. The SHIP directly reduces this inequality by significantly increasing the supply of social and

Socio-economic disadvantage	Potential impact	Explanation
		affordable tenures. Because social rents are capped at deeply subsidised rates, families experience an immediate increase in their net disposable income, directly reducing relative and absolute poverty rates.
Low and/or no wealth	Positive	Households with minimal savings or assets are highly vulnerable to economic shocks (e.g. sudden job loss, illness, or inflation). By providing long-term security of tenure and sub-market rents, the SHIP removes the threat of arbitrary eviction and prevents households from being forced into high-interest debt traps. The reduction in fixed living costs allows vulnerable individuals the financial breathing room to build emergency savings and long-term financial resilience.
Material deprivation	Positive	Income poverty restricts a household's ability to afford basic life essentials. By lowering fixed housing costs, the SHIP frees up vital household capital. This allows families to securely afford nutritious food, clothing, digital connectivity, and transport, effectively reducing material deprivation for adults and children alike. Additionally, high energy-efficiency insulation and zero-carbon heating protect tenants from the material impacts of fuel poverty.
Area deprivation	Positive	Concentrating low-income households in singular pockets can reinforce generational cycles of deprivation. The SHIP actively mitigates this via strategic site allocations and Section 75 developer agreements. By building mixed-tenure affordable housing across diverse, high-opportunity catchments, the council prevents economic segregation and ensures equal access to well-funded schools, jobs, public transport, and health services.
Socio-economic background	Positive	An individual's upbringing or generational family background shouldn't dictate their future life chances. Growing up in overcrowded, cold, or temporary accommodation heavily disrupts a child's health and educational attainment. The SHIP provides stable, high-quality, permanent family homes. This breaks the link between a disadvantaged background and poor life outcomes, narrowing the educational attainment gap and boosting social mobility.

Socio-economic disadvantage	Potential impact	Explanation
Other (Vulnerable Population Groups)	Positive	The SHIP's capital funding is intentionally targeted at specific cohorts who are disproportionately vulnerable to poverty in Midlothian. This includes lone-parent families (by expanding affordable options), large families (via the Open Market Purchase Scheme for 3+ bedroom homes), care-experienced young people (providing stable foundations for independent living), and disabled people (through strict wheelchair-accessible housing quotas).

Environment

16. What impact could the proposal have on the environment?

Considerations relating to the environment, climate change and sustainability are described on pages 19-20 of the IIA Guidance.

Potential impact	Affected populations	Explanation
Positive	• Social housing tenants. • General Midlothian population. • Future generations. • Low-income families. • Elderly and vulnerable tenants. • Children in social housing. • Local communities adjacent to new sites. • The global environment. • Local wildlife species. • Residents utilising outdoor amenities. • Commuters and families. • Public transport users.	All new-build affordable homes delivered under the SHIP are built to strict Scottish building regulations and zero-direct-emissions heating standard mandates. Incorporating high levels of fabric insulation, triple-glazing, and renewable tech (e.g. heat pumps) significantly lowers the operational carbon footprint of Midlothian's housing sector compared to older, fossil-fuel-reliant housing stock. Evolving climate patterns increase the frequency of extreme weather events, which disproportionately penalise poorer households. By removing fossil fuels and maximising thermal performance, these homes are structurally resilient to climate change. This lowers space-heating demands, protecting vulnerable populations from seasonal temperature extremes and removing them from fuel poverty. communities adjacent to new sites.

Potential impact	Affected populations	Explanation
		The physical development of the planned 1,099 affordable homes over the five-year cycle requires heavy machinery, transport, and raw materials (concrete, steel, timber). This creates localized noise and air pollution during building phases and adds significant embodied carbon to the atmosphere. Mitigation: Procurement policies require Registered Social Landlord (RSL) partners and contractors to use locally sourced, sustainable materials and low-carbon construction methods wherever feasible. Building on greenfield or brownfield plots inevitably alters existing local ecosystems, plant life, and natural water drainage. However, this is heavily countered by statutory planning constraints. The SHIP works alongside modern placemaking frameworks, such as the Lingerwood 20-minute neighbourhood model, ensuring new layouts integrate sustainable drainage systems (SuDS), native woodland planting, and meadows to actively support urban biodiversity net gain. Expanding housing developments into key growth areas (like Midlothian East and the Borders Rail Corridor) can increase regional traffic and emissions if residents remain dependent on private cars. Mitigation: Site selections within the SHIP prioritize locations near existing public transport hubs and include integrated walking, wheeling, and cycling links. This design cuts car dependency and supports the council's net-zero active travel mandates.

If the proposal is likely to have a significant impact on the environment (positive or negative), it is advised that you undertake a Strategic Environmental Assessment (SEA). Further information on when an SEA is required can be found on page 19 of the IIA Guidance and on the [Scottish Government website](#).

If you have identified any impact (positive, negative or neutral) on protected characteristic groups, children and young people, human rights, socio-economic disadvantage or the environment, you must complete all of the remaining sections.

If you have not identified any potential impact on protected characteristic groups, children and young people, human rights, socio-economic disadvantage or the environment, please advance directly to **question 29 (Recommendation)**.

Evidence

17. What data, research and other evidence informed the proposal?

Evidence can include, for instance, surveys, databases, census and population figures, focus groups, in-depth interviews, pilot projects, reviews of complaints, user feedback, academic publication and consulting reports.

Evidence source	Explanation (what does the evidence tell us about nature and scale of the potential impact?)
South East Scotland Housing Need and Demand Assessment (HNDA3)	This key regional data framework provides the audited, quantitative baseline for housing demand across all tenures. It confirms an acute, systemic shortfall in affordable housing supply relative to Midlothian's population growth. This evidence dictates the required volume, size, and geographic placement of the 1,099 new homes targeted in the SHIP to directly reduce local waitlists.
Midlothian Local Housing Strategy (LHS) 2026/27 – 2030/31 Consultation	Developed using extensive local community focus groups, tenant surveys, and public stakeholder input. The user feedback highlighted clear, urgent priorities: tackling hidden homelessness, supporting independent living, improving thermal energy efficiency, and expanding affordable options near transport links. This directly shaped the SHIP's balanced delivery model across Council and Registered Social Landlord (RSL) targets.
Midlothian Local Child Poverty Action Report (LCPAR)	Local databases show that high private sector housing costs are a major cause of relative child poverty in Midlothian. The LCPAR highlights a distinct need for larger family properties to alleviate overcrowding. This evidence directly informed the design of the Open Market Purchase Scheme, which shifts capital resources to buy back 3+ bedroom properties specifically to protect vulnerable children.
Midlothian Rapid Rehousing Transition Plan (RRTP)	Local statistical tracking and homelessness databases demonstrate a high volume of households (particularly single parents and care-experienced youth) spending long periods in temporary accommodation. The RRTP data demands an expansion of permanent social tenures to reduce these waiting times and provide safe, immediate pipelines out of domestic abuse situations.
Midlothian Health and Social Care Partnership Data / Adaptations Audit	Local social care databases and hospital discharge figures show an aging population and a growing number of individuals with long-term physical or cognitive disabilities. The data explicitly links delayed hospital discharges to a lack of suitable homes. This evidence directly led to the implementation of strict, mandatory Wheelchair Accessible Housing Targets across the new-build program.

Evidence source	Explanation (what does the evidence tell us about nature and scale of the potential impact?)
Strategic Needs Assessment for Gypsy/Traveller Accommodation in Midlothian	A targeted local review combining direct interviews and site assessments within the Gypsy/Traveller community. It established specific structural gaps in culturally appropriate accommodation options and site conditions. This evidence ensures that capital funding is ring-fenced within the SHIP for local site upgrades.
Scottish House Condition Survey (SHCS) for Midlothian	Regional datasets track the energy performance, heating sources, and dampness levels of Midlothian's current housing stock. The survey highlights that low-income and pensioner households are highly vulnerable to fuel poverty due to poorly insulated homes. This evidence informed the SHIP's strict mandate that all builds must exceed basic building regulations and feature zero-direct-emissions heating networks.
Midlothian Council Rent Setting Strategy Consultation	Feedback from recent online tenant surveys and face-to-face drop-in sessions regarding rent affordability. The data confirms that escalating cost-of-living challenges require social rents to remain capped at deeply subsidised rates. This ensures the capital build plan remains financially viable without imposing unmanageable rental costs on tenants.

Consultation and Engagement

18. How has the proposal been informed by consultation and engagement?

Please explain who was consulted/engaged during the development of the proposal, the extent of their involvement, what their views were and how these have been taken into account.

The Strategic Housing Investment Plan (SHIP) is built upon a continuous cycle of public engagement and co-production. Rather than designing investment plans in isolation, Midlothian Council utilized the extensive public findings of the Local Housing Strategy (LHS) consultations to dictate the scale and focus of capital expenditure. Every major element of the SHIP responds directly to community views: tenants' financial fears drove the commitment to subsidised social rents and net-zero thermal efficiency; health partnership evidence mandated the strict implementation of wheelchair quotas; and direct engagement with the Gypsy/Traveller and homeless support sectors ensured resource distribution actively protects the region's most marginalized populations. This continuous engagement guarantees the proposal remains accountable, transparent, and directly reflective of community need.

Mitigating Actions

19. Could the proposal, in its current form, discriminate against people in a protected characteristic group? No
20. Could the proposal, in its current form, violate the rights of children and young people under the UNCRC Act? No
21. Could the proposal, in its current form, violate human rights under the European Convention on Human Rights (ECHR)? No
22. Could the proposal, in its current form, entrench or increase inequality of outcome due to poverty? No

23. If applicable, please describe any actions which could be taken to remove or mitigate the potential negative impact of the proposal.

Please provide estimates of the resource implications of adopting these actions.

While the overarching strategic impact of the SHIP is profoundly positive across all vectors, the physical scale of delivering 1,000+ homes over a five-year cycle introduces localised, short-term negative environmental, economic, and practical pressures. To remove or mitigate these potential negative impacts, Midlothian Council has integrated a series of targeted, proactive actions into the plan.

Firstly, to address the embodied carbon and construction emissions generated by heavy transit and raw building materials during the physical build phase, the council will enforce low-carbon procurement frameworks for all Registered Social Landlord (RSL) partners. Contractors will be mandated to use sustainable, locally sourced materials and to prioritize off-site modern methods of construction (MMC) where feasible to cut waste. The resource implications for this action are neutral and absorbed, as they are managed entirely within existing capital procurement budgets with no additional revenue requirements, though slight variations in early-stage tender pricing may occur.

Secondly, regarding the localized infrastructure strain where rapid residential expansion can overwhelm local school capacities, GP surgeries, and public transport links, the council will formally align individual site allocations with the Midlothian Local Development Plan (LDP), the draft Midlothian Plan (LDP2) and Education Services. Section 75 developer contributions will be actively utilised to mitigate the impact of development, including funding towards local school expansions and upgrades to active travel pathways alongside new estates. The resource implication is that these measures are only part-funded by developers; their capital payments serve as a contribution toward the overall provision via Section 75 agreements, thereby minimising direct financial pressure on core council funds. Thirdly, to prevent geographic separation and social segregation, which occurs when concentrating too many social homes in a singular pocket and risking the accidental creation of areas of deprivation, the council will seek to implement Midlothian's Mixed Tenure Strategy across new housing developments. This policy ensures that new housing estates seamlessly blend council houses, housing association units, and mid-market rentals to foster balanced, vibrant, and integrated communities. This action carries no additional cost, as it is administered through routine strategic land-use planning and existing partnership frameworks.

Finally, to address the disruption to local communities and eco-systems caused by building on greenfield or brownfield plots—which naturally impacts local biodiversity, noise levels, and natural water drainage—the council mandates the integration of Sustainable Drainage Systems (SuDS), native woodland tree planting, and green corridors across all housing footprints. This will actively secure local biodiversity net gain and prevent regional flood risks. The resource implication for this action is completely absorbed in capital spend, as these features are integrated directly into individual site project budgets as standard civil engineering and planning requirements.

Commented [FC1]: and draft Midlothian LDP2

Commented [FC2]: It's a strategy rather than document for enforcement so more will seek to implement the strategy to...

24. If you have identified any potential negative impact which cannot be removed or mitigated, please clearly state your justification for continuing with the proposal.

No permanent, unmitigated negative impacts have been identified. The short-term environmental and community disruptions caused by the construction phase (such as localised emissions, traffic, and noise) are temporary, heavily managed, and vastly outweighed by the long-term, positive socio-economic outcomes of the project. Continuing with the proposal is entirely justified. The SHIP is an essential tool for lifting families out of deep income and fuel poverty, permanently reducing housing waitlists, and fulfilling Midlothian Council's statutory anti-poverty duties under the Fairer Scotland Duty, the Human Rights Act, and the UNCRC (Scotland) Act. Halting the plan would cause severe, systemic harm to vulnerable children and protected groups by trapping them in insecure, overcrowded, or financially crippling private sector arrangements.

NOTE: If the proposal could be deemed discriminatory under the Equality Act, UNCRC or ECHR, you must revise the proposal to ensure that the Council acts lawfully.

Monitoring and Review

25. How will the implementation and impact of the proposal be monitored? How frequently and by whom?

The implementation and impact of the SHIP will be subjected to a rigorous, multi-layered governance framework to ensure all capital allocations match their intended socio-economic and environmental targets. Progress against affordable housing delivery numbers, wheelchair-accessible unit targets, and funding drawdowns is monitored on a continuous basis by the Midlothian Council Housing Strategy Team. Formally, a comprehensive review is conducted annually in partnership with Registered Social Landlords (RSLs) and the Scottish Government's More Homes Division. Furthermore, key performance metrics—including impacts on local child poverty reduction, waiting list times, and homelessness presentations—are reported quarterly to the Midlothian Council Cabinet and reviewed by the cross-party Performance Review and Scrutiny Committee.

26. How will the results of this monitoring be used to develop future proposals?

The empirical data collected from ongoing monitoring will serve as the primary evidence base for designing future housing investment cycles. If annual data reveals a persistent shortfall in specific geographic areas or a bottleneck in delivering larger family units, capital allocations will be dynamically rebalanced in the subsequent year's rolling plan. Similarly, post-occupancy evaluations tracking tenant utility bills will prove the real-world efficiency of new low-carbon heating systems, directly shaping future building fabric specifications. This continuous feedback loop ensures that future SHIP proposals adapt to changing demographic pressures, shifting economic constraints, and emerging legislative requirements, maintaining total alignment with the Fairer Scotland Duty.

27. When will the proposal be reviewed?

The Strategic Housing Investment Plan is a rolling five-year document that undergoes a mandatory statutory review every 12 months. The next formal review and update cycle will culminate in late autumn, ahead of the annual submission deadline to the Scottish Government. This regular review schedule ensures the plan remains agile, allowing the council to adjust to sudden shifts in national grant funding, changes in construction market inflation, or localized updates to the Local Development Plan.

28. If the proposal is to be delivered wholly or partly by contractors, what arrangements are in place to ensure equality, human rights and environmental issues are properly considered?

Because the physical delivery of the housing stock relies heavily on external contractors and RSL partners, Midlothian Council embeds strict compliance mandates directly into the procurement and tendering process. All framework agreements and individual construction contracts are subject to public procurement regulations that require strict adherence to the Equality Act 2010 and fair work practices. Contractors are legally bound to uphold non-discriminatory hiring and on-site practices, protecting workers' human rights. Additionally, community benefit clauses are written into all major capital contracts, legally requiring builders to deliver local apprenticeships and economic support to disadvantaged young people in Midlothian. On environmental issues, contract specifications mandate strict site waste management plans, localised pollution controls, and the use of sustainable, low-embodied-carbon materials. Compliance is actively monitored throughout the lifetime of the project by council clerk of works and procurement officers, with non-compliance triggering formal contractual penalties.

Recommendation

29. What is your recommendation for the proposal?

- Adopt proposal with no amendments ☐
- Adopt proposal with mitigating actions (outlined above) ☒
- Reject proposal due to disproportionately negative impact on equality, human rights or the environment ☐

30. Please give the reasoning behind your recommendation

- Include reference to any potential impact you have identified during the IIA process.
- **If you have not conducted a full impact assessment by completing all sections of this form, please explain why.**

The recommendation to adopt the Strategic Housing Investment Plan (SHIP) with the specified mitigating actions is grounded in a comprehensive, evidence-driven evaluation of its long-term socio-economic, human rights, and environmental impacts. A full impact assessment has been conducted across all sections of this form, drawing on data from the South East Scotland Housing Need and Demand Assessment (HNDA3) and local child poverty tracking. The assessment demonstrates that the proposal serves as a vital structural mechanism for reducing systemic inequalities across Midlothian. By expanding deeply subsidised social housing, the SHIP directly targets the root causes of income poverty, material deprivation, and housing insecurity, while fulfilling the council's statutory obligations under the Fairer Scotland Duty.

Throughout the assessment process, profound positive impacts were identified across multiple protected characteristic groups, particularly regarding age, disability, and sex. The plan actively safeguards the rights of children and young people under the UNCRC Act by lowering child poverty, alleviating overcrowding, and supporting educational continuity. Furthermore, it upholds European Convention on Human Rights (ECHR) principles—specifically Article 3 and Article 8—by providing vulnerable individuals with safe, permanent,

and dignified homes, moving them out of inadequate private arrangements or extended stays in temporary accommodation. From an environmental perspective, the operational phase of the completed housing stock is highly positive, utilising strict zero-direct-emissions heating standards and advanced insulation to structurally eradicate fuel poverty and reduce the local authority's carbon footprint.

The justification for incorporating mitigating actions, rather than adopting the proposal without amendments, rests on managing the temporary challenges inherent in large-scale capital construction. The physical development of 1,000+ homes inevitably introduces localised short-term disruption, including embodied carbon emissions, threat to greenfield biodiversity, and pressure on local school and transport capacities. Adopting the proposal alongside the specified mitigations guarantees that these issues are explicitly controlled. By legally binding contractors to low-carbon procurement frameworks, mandating the inclusion of Sustainable Drainage Systems (SuDS) and green infrastructure, and utilising Section 75 developer contributions to expand school and active travel capacity, the council effectively neutralises short-term risks. Consequently, proceeding with the proposal is entirely justified, as the temporary construction impacts are heavily managed and vastly outweighed by the permanent, life-changing socio-economic and environmental benefits delivered to the residents of Midlothian.

Authorisation by Director/Chief Officer/Head of Service

Name and job title

Fiona Clandillon

Date

28/08/2026

Click or tap to enter a date.

Signature

