# Raising the roof

## Can Scotland's *Housing to 2040* Strategy help as an approach to reduce health inequalities?

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# Executive Summary

Reflecting national aspirations to address persistent health inequalities through joined up policymaking (1), this Scottish Health Equity Research Unit (SHERU) briefing examines which of the multiple commitments within *Housing to 2040* have the potential to contribute to health equity. Published in March 2021, *Housing to 2040* is Scotland's first long-term national housing strategy. In this briefing, we consider the potential for key actions within this strategy to contribute to reducing health inequalities in the context of what we know about implementation of the strategy so far. Implementation is occurring within the backdrop of a declared national housing emergency, multiple local authority housing emergencies, and ongoing fiscal and systemic pressures. At SHERU, we recognise that addressing health inequalities is a continually evolving challenge. Through this briefing, we aim to foster dialogue on how Scotland can more effectively tackle these inequalities, by acknowledging and responding to key social determinants of health, such as housing.

# Methods and Approach

This is the first stage in SHERU's policy focused analysis of efforts to improve housing and reduce homelessness in Scotland. The overarching aim of this programme of work is to understand policy intent at a national level, to examine operationalisation and implementation (much of which happens locally), and to explore community experiences. This briefing focuses specifically on understanding Scottish Government policy *intent* and assessing progress with *implementation* at a national level.

We undertook our analysis from a health equity perspective, focusing on assessing the potential for the 20 actions outlined within *Housing to 2040* to contribute to reducing health inequalities. This analysis was informed by the wider evidence base on health inequalities, housing and health, and by evidence of progress with implementation to date. While our analysis centres on *Housing to 2040,* we also consider related national policies to assess coherence that address related social determinants of health, including the child poverty delivery plan *Best Starts Bright Futures*, and the national employability strategy *No One Left Behind*. This was complemented by an examination of official government reports, parliamentary discussions, and a wide body of research and evidence from academic and third sector sources.

The findings highlight some of the challenges in achieving the effective realisation of national ambitions to improve housing and reduce health inequalities.

# Key findings

- The *Housing to 2040* strategy positions and recognises housing as a key social determinant of health in Scotland, emphasising its role in reducing health inequalities. It acknowledges the importance of providing Scotland with safe, affordable homes, fit for household needs, and recognises the social, cultural, and economic importance of housing for communities across Scotland. The strategy seeks to address systemic issues such as housing quality, security and affordability, which directly impact physical and mental health outcomes across the life course.

- Despite ambitious commitments, *Housing to 2040* faces significant implementation challenges. The national housing emergency declared in 2024, combined with funding constraints and diverse stakeholder interests, has complicated policy coherence and delivery, limiting progress on health equity. Local authority declarations have further highlighted systemic pressures, with responses and local context, impacting both immediate objectives within the housing system and to the short- and long-term trajectory of the strategy. The interplay between local implementation and national aims in Housing to 2040 highlights significant challenges in how integration is operationalised, understood, and evaluated.

- Several actions within the strategy, such as homelessness prevention, improving housing standards, and energy efficiency retrofit programmes, have clear potential to reduce health inequalities, especially if targeted at the most disadvantaged groups. However, high-potential actions to tackle health inequalities within *Housing to 2040* have all faced implementation challenges. Key examples include the planned Human Rights Bill not being introduced, revisions to the Heat in Buildings Bill, as well as differing political perspectives and financial interests complicating major policy changes such as taxation reform and rent controls. These factors may affect the pace and scope of implementation. The wider policy environment, including the *Public Sector Reform Strategy* (emphasising efficiency, integration, and fiscal sustainability) and *Scotland's Population Health Framework* provide new policy 'drivers' to shape implementation, creating opportunities to align housing with health and social care, and reinforcing a system-wide focus on prevention within and beyond the housing system.

- Some key concepts and targets also remain unhelpfully vague. For example, quantified affordable housing targets risk being undermined by a lack of a clear definition as to what is meant by 'affordable housing' although *Housing to 2040* did acknowledge and set an action to develop a working definition of this. As an accompanying briefing demonstrates this has resulted in substantial variation in how this aspect of *Housing to 2040* is being interpreted by local councils (2). In

addition to hampering monitoring efforts, this is crucial from an inequalities perspective because different definitions have implications for local-level decisions which, in turn, impact on the potential for ensuring that the lowest income households benefit most. The concept of affordable housing must also be acknowledged as an integral part of the right to adequate housing with the Office of the High Commissioner for Human Rights (OHCHR) and the Committee on Economic, Social and Cultural Rights (CESCR) ascribing that the affordability of housing is fundamental to the right to protection against poverty and social exclusion (3).

- In addition to the uncertainties around how affordable housing should be defined, implementation is being hampered by short-term budgets rather than sustained multi-year funding, adjustments to funding commitments, varying stakeholder interests, and difficulties related to the targeting and delivery of resources. The declaration of national and local housing emergencies has brought additional implementation challenges, on top of societal challenges, notably the ageing population. The Housing Emergency Action Plan, published earlier this month, commits up to £4.9 billion over four years to deliver approximately 36,000 affordable homes by 2029–30 (4). Despite this investment, concerns remain regarding the adequacy of funding, the transparency of new versus repurposed allocations, and the reliance on private finance, which may exacerbate affordability pressures.

- We also note actions within *Housing to 2040* that we believe have lower potential to help reduce health inequalities in the short to medium-term but will have increased importance over the longer-term. This includes green jobs, and approaches to planning and infrastructure. The direct impact of action in these areas may be slower to emerge but could play an important role in the impacts of climate change and a rapidly changing economy in coming decades. Here, we find that implementation progress has been uneven, with minimal short-term benefit for those facing poor housing or affordability issues. A key challenge remains balancing upstream, preventative strategies with urgent action to meet immediate housing needs and reduce existing inequalities in housing and health.

Overall, while *Housing to 2040* includes multiple welcome intentions, many of which have the potential to help reduce health inequalities, given the centrality of housing for people's mental and physical health, success depends on implementation as well as the longevity and resilience of a long-term housing strategy such as *Housing to 2040* to be effective across evolving political contexts and other contextual shifts or drivers (5). Its capacity to reduce health inequalities will depend less on its aspirational vision than on progress with implementation (embedding health outcomes into monitoring frameworks, ensuring prioritisation of disadvantaged populations, and supporting consistency across local

delivery). Balancing immediate crisis responses as well as longer-term objectives will be critical to achieving measurable improvements in population health and the reduction of inequalities over the coming decades. Here, our assessment is that there is a lot more work to do, if well-intentioned plans and the impact of the strategy are to effectively support the communities most in need of better housing and most at risk of poor health outcomes.

## Section 1

# Recognising housing as a social determinant of health

Housing is critical to the health of Scotland's population (6). There are multiple, interconnected pathways, from poor-quality housing that exacerbates respiratory conditions, to insecure housing adversely impacting mental health. The role of housing as a core social determinant of health is extensively evidenced in UK and international literature (7) (8) (9) (10).

The following extracts are taken from a [layered systems map of housing and health](). Created as part of the UKPRP funded SIPHER research consortium, this map visually depicts the relationship between housing and health, combining published evidence with accounts from SIPHER's Community Panel members. The first extract, from Liam, vividly depicts the negative impacts on health and wellbeing of life home-caring for a disabled relative in an unsuitable privately rented home. He describes a housing system that not only fails to meet a person's needs but operates in a way that leaves people feeling disregarded and stigmatised. The second extract, from Christina, demonstrates the foundational role that good housing can play in improving people's health and broader circumstances (11):

> We're in a house with stairs. The toilet is upstairs. […] I spoke to council housing and said we could do with something on the level [due to changing health needs]. So I had to go down to the Council to fill out this form. So I filled out the form but, the housing situation being as chaotic as it is, to me they're more focused on building houses for folk that can afford to buy them, rather than rent them. It's like people that are, and I hate using this term, because I do come under it myself, and it's humiliating, but for people financially on the lower side, it's almost like you're invisible, like they're no' that bothered. People on the lower scale, it's almost like they would rather you would just go away. And it's horrible having to go to speak to these people, and try and be calm, knowing what they think of you. It is difficult. We were needing internal banisters put in for going up and down the stairs. And the landlord refused to do one. She said 'get the bloody council to do it'. Which shows how much they think of us. I mean we've paid them upwards of about £70,000 in the eleven years. It's madness. It seems to me that everybody's just got so greedy. So again, are you being pushed aside?
>
> *Male participant, 50s*

> After living with my parents for a year due to a significant break in my mental health, I was offered social housing. A one bed flat, in a new build scheme. My mental health had improved after a year of counselling, and this was a natural next step for me. I was signed off sick from work indefinitely - but during those first three years, my mental health continued to improve. This was in large part because of my housing and the independence it gave me, as living with my parents in my mid-20s affected my mental health. Living alone again was something I was immensely proud of. The new build I am in has great insulation, is less than three miles from my support system, and full of families and disabled people which gives me a sense of safety that my anxiety so needs. We have a Facebook page for things such as warnings of anti-social behaviour, lost pets, and other minor concerns like water issues. The bus routes that pass my flat are vital to my ability to work, and regularly. After three years, I secured a part-time job, my first in over five years. This was a huge step for me and was aided because I felt safe. Due to it being social housing, should any financial concerns come up, I am less anxious because it is the Council I report to, and my housing officer is very hands on. Now, I work full-time. And the day I paid full rent, after going full-time, was such a great accomplishment given where I was — no achievements and little hope. I will always be grateful for this flat.
>
> *Female participant, 20s*

At its core, as these extracts illustrate, a home that fails to meet people's needs due to being unaffordable or insecure, cold and damp, overcrowded, or which simply fails to meet occupant needs, impacts on a people's physical and mental health (12). So defined is this relationship that it can be demonstrated in adverse health impacts across the life course, from post-natal women and infant health outcomes (13) to older people, who are hospitalised more often for fall related injuries when homes are not adequately adapted (14).

## Framing of 'Housing to 2040'

It is against this understanding of housing as a core social determinant of health that we analyse and situate the Housing to 2040 strategy (15). This Scottish Government strategy, first published in March 2021, sets out a vision for housing across Scotland and related policy objectives and actions, and currently provides the main policy framework for housing.

The strategy has influence over a diverse range of stakeholders in Scotland's housing sector include government bodies, local authorities, housing associations, and commercial actors such as private developers, landlords, and investors. These actors influence not only the availability and quality of housing, but also broader social determinants of health such as stability, affordability, and environmental conditions. Given their influence on the social determinants of health, the role of these actors is closely connected to the ambitions of Scotland's long-term housing strategy.

Housing to 2040 was described by Scottish Government as

> "*a vision for housing in Scotland to 2040 and a route map to get there. It aims to deliver our ambition for everyone to have a safe, good quality and affordable home that meets their needs in the place they want to be*" (15).

It aimed to offer a 20-year, long-term approach to driving policy action to meet the housing needs of Scotland's population (15). The strategy was also framed as a key contributor to addressing and tackling child poverty (15).

Given the scale of the housing challenge in Scotland, *Housing to 2040* has the potential to play a pivotal role in improving the health of Scotland's population and reducing health inequalities. Mirroring the well-established evidence base that demonstrates housing is a key social determinant of health, housing policy is framed in the strategy as critical to addressing inequalities in life chances and social outcomes across Scotland.

> "*We want to ensure housing in 2040 will support people to live in homes they want to live in, which are affordable and meet their needs*"

> *"Homes have never been simply bricks and mortar – good housing and homes support our health, our wellbeing, our life chances and our job prospects. Everyone should have a home that brings them those chances and opportunities"* (15)

*Housing to 2040* also recognises the social importance that people subscribe to the idea of 'home', recognising factors such as social and cultural meanings people ascribe to their place of habitation well as the connection to other critical components of life such as education and employment (16).

It also recognises the importance of a well-functioning housing system required to support equality without explicitly defining what that means or the evaluation and monitoring framework required to understand the realisation of this objective.

> *"Ensure we deliver a robust and strong housing system that delivers fairness and equality for people and communities in Scotland over the next twenty years"* (15)

The strategy acknowledges that while some aspects of housing policy have the potential to reduce inequalities, this will only happen if implemented in a proportional way that takes account of people's varying circumstances. For example:

> "*Regulation will be introduced in a way that is proportionate, and which considers the health and wellbeing of Scotland's people, ensuring our actions have no detrimental impact on fuel poverty, unless additional mitigating measures can also be put in place*" (15)

Recognising unintended policy consequences in the strategy is a good first step, but the real test is whether implementation of actions within *Housing to 2040* can sufficiently mitigate against these risks in practice. While the strategy notes 'risks', it lacks clarity on the practical steps or structures that will be employed consistently across *Housing to 2040* to mitigate these risks. This also raises questions about the extent to which unintended consequences and harms are being considered (17,18).

As Karapin and Feldman (2016) note, unintended consequences abound because policymaking is complex, and no single actor or institution controls every political or economic variable (19). For *Housing to 2040* this complexity and interplay within the housing system is further compounded by the current context of the declared housing emergency. This context poses a critical challenge to the delivery of the strategy and its ambitions. In 2024, 13 Scottish local authorities declared a housing emergency. Whilst the drivers of these 'emergencies' varied across local authorities, these declarations have reinforced the myriad challenges across housing domains, such as housing access, housing quality and security that many households are facing, with consequent impacts on health and wellbeing across the Scottish population (20). Other local authorities have reported facing similar local contextual challenges and responding to wider systemic localised pressures without a

declared emergency status (21). The interplay in this context, between local implementation and national aims in *Housing to 2040*, raises important questions about how integration is operationalised and understood and evaluated in this context. However, the absence of a statutory basis for local authority plans in relation to the Scottish Government weakens the formal alignment and accountability between local and national levels, raising questions about the consistency and enforceability of delivery across Scotland.

The Scottish Parliament itself agreed a motion supporting the declaration of a National Housing Emergency in May 2024 (22). The resulting inquiry has echoed the complexity of Scotland's housing system and stressed the importance of coherent policy design and a focus on implementation. This enquiry also emphasised the need for a whole system approach to housing at the national level, with the committee recommending how different policy teams might collaborate to improve the impacts of national housing policy (21)

The Scottish Government has recently published its new *Housing Emergency Action Plan*, which acknowledges the ongoing pressure being faced within the housing system:

> *"Significant pressure remains on local authorities, partners and stakeholders to deliver Scotland's ambitious housing and homelessness services"* (4)

The *Housing Emergency Action Plan* includes a commitment to invest up to £4.9bn over the next four years, though how much of this investment represents new funds and how much is simply existing commitments being brought forward (or repackaged) is unclear. These action plan aims to deliver around 36,000 affordable homes by 2029-30 and providing a home for up to 24,000 children. It also confirms plans to implement 'Awaab's Law' (discussed further later in this report) from March 2026, to ensure landlords promptly address issues that are hazardous to tenants, with an initial focus on damp and mould (subject to parliamentary approval). The action plan also notes there will be a new £1m national 'fund to leave' to provide financial support for up to 1,200 women and their children to leave an abusive partner (4).

Reactions to this across the housing sector reactions have been mixed, with concerns being raised that these actions may not be of sufficient scale to meet projected need, and an evident desire for a clear approach to monitoring and evaluation to support delivery (23).

# Section 2
# The promises and progress of *Housing to 2040*'s contribution to reducing health inequalities

Recognising the systemic complexity of housing policy is critically important in housing policy since there are a diversity of stakeholders and interests seeking to shape the housing system, including commercial entities with financial interests, such as property developers and letting agencies. Whilst *Housing to 2040* recognises some of this complexity, there is only limited acknowledgement of the interaction of these competing interests within Scotland's housing system and little clarity on how these conflicts might be addressed. The examples below are indicative of the way this strategy expresses an awareness of potential tensions, and a desire to overcome these, but with little clarity as to what the right balance might be or *how* progress might be achieved:

> *"We are clear that the tension between tackling emissions and ending fuel poverty must be overcome and remain steadfast in our commitment to supporting those least able to pay in the net zero transition, and in protecting those who are most vulnerable to any increase in costs"* (15)

> *"Striking a better balance between local housing need and the concerns of residents with that of wider economic and tourism interests"* (15)

The strategy is vague about balancing immediate pressures with long-term aims. Since *Housing to 2040* is a 20-year strategy, it serves a dual purpose of trying to future-proof the housing system for 'known' national challenges, such as the ageing population and climate change, as well as addressing more uncertain challenges around the changing global economy and shifting political dynamics.

Reflecting these aspirations, this briefing examines which of the multiple commitments within *Housing to 2040* has potential to help reduce health inequalities, considers how these intersect with the way housing is discussed in related policies that are cross-referenced (e.g. policies focusing on reducing child poverty), assesses evidence of progress, and considers potential gaps and limitations (with reference to available health inequalities evidence).

## Our approach

In this part of our analysis, we focused on aspects of *Housing to 2040* that met at least one of the following criteria:

- Specifically referred to social inequalities

- Focused on households/people living on low incomes or in poverty

- Concerned housing differences between two or more areas or population groups

- Focused on a specific population group known to have worse health outcomes than the average population or those who face health risks (including SHERU's two population groups of interest: low-income households with young children and men aged 18-44)

- Concerned an idea or approach that has been explicitly linked by Scottish policymakers to efforts to reduce health inequalities in Scotland

In undertaking our analysis, we employed a tripartite framework in which we categorised actions as having high, medium or low potential to reduce health inequalities in Scotland. However, we have chosen to present the findings using a simpler categorisation of actions with greater or lesser potential to reduce health inequalities. This is because it was often hard to categorise actions with much precision or certainty. In many cases, for example, we identified plausible evidence that an action could, if achieved, help reduce health inequalities but limited evidence that the action was yet close to being realised. The highly pressurised housing policy environment also meant that commitments (including resources to support implementation efforts) changed rapidly, even as we were writing this report.

While an overarching commitment to ensuring housing contributes to reducing inequalities is evident within *Housing to 2040*, details regarding how specific investments and policy action might collectively contribute to reducing health inequalities is less clear. If housing policy is to make a measurable and demonstrable contribution to reducing health inequalities in Scotland, as the new *Population Health Framework* suggests, actions must prioritise and support households that are experiencing the greatest disadvantage, notably by focusing on support for those in the lowest income groups and providing more affordable housing, but also by recognising intersecting systemic inequalities (e.g. discrimination and racism) (1).

Nationally we have seen the recent inclusion of housing within the *National Performance Framework* in 2024 and the *Population and Health Framework* in 2025. These are important markers of Scottish Government recognition of the importance that housing plays for population health and wider sustainable development goals (24) (1).

Currently within Scotland, the need to improve housing experiences for communities is clear, with a growing body of evidence demonstrating the challenges in housing access and quality of housing within Scotland (25) (26) (27) (28) (29). This is mirrored in the policy landscape with declared national housing emergency and subsequent parliamentary inquiry (21).

## A Declared Housing Emergency and Policy Implementation

To assess whether *Housing to 2040* can reduce health inequalities in 2025 we need to consider how the current emergency is shaping both national housing priorities and local delivery. Research by Boin et al (2009) highlight that how a crisis is framed influences how it is understood and addressed. In their analysis, they suggest characteristics that can be observed within typical crisis scenarios: sense-making of an uncertain and dynamic threat; the need to get things done in response to the crisis, to form credible narratives around the crisis; and work towards the closure of the crisis (30). In the case of *Housing to 2040,* the sense of subsequent crisis has been driven by multiple local authorities declaring housing emergencies before a national housing emergency was acknowledged which, in itself, underlines the gap between the stated intent of *Housing to 2040* and the reality on the ground (31).

It is vital to examine the public and political narratives surrounding the housing emergency, including the solutions being proposed and their acceptability and effectiveness. Consideration must also be given to how responses can shift from immediate crisis management toward long-term prevention. This requires understanding the roles of various actors, including government bodies and the wider public, as well as the differences and needs within local authorities across Scotland, and across urban and rural geographies.

Given that housing is a key determinant of health, we must also assess whether the housing emergency, and responses to this emergency, are reducing or exacerbating health inequalities. This involves identifying the primary health impacts associated with the current framing of the housing emergency and understanding how these impacts affect disadvantaged groups such as older adults, people with disabilities, and ethnic minorities. Furthermore, it is critical to explore how the housing emergency interacts with other social factors including employment, income, and poverty.

The current emergency sets a challenging context that could impact the progress of the *Housing to 2040* strategy and influence how effectively its associated actions and legislation are implemented. The strategy's ability to remain agile and responsive will be crucial in navigating these challenges.

This backdrop of emergency will have implications for the *Housing to 2040* strategy and the implementation of actions and bills arising from it. At present, several bills being scrutinised within the Scottish Parliament are central mechanisms to some of the strategies wider objectives. Currently there is the [Community Wealth Building (Scotland) Bill](#), [Housing (Scotland) Bill](#), as well as the forthcoming revised of the [Heat in Buildings bill](#) and related bills such as the [Land Reform (Scotland) Bill.](#) The scrutiny of all these bills offers an opportunity to support the housing system within Scotland. Moreover, in the context of the forthcoming Scottish Election (likely May 2026), the ideas and commitments set out by

political parties on the housing system and wider related policy areas are of continual importance (32) (33) (34) (35).

Ultimately, *Housing to 2040* should be judged not by its long list of actions, but by how coherently these actions are implemented and whether they address Scotland's housing needs. If the ambition of using housing to help reduce health inequalities is to be achieved, then assessments of *Housing to 2040's* success must be informed by the needs of those who face the greatest challenge. Continuous scrutiny is required to ensure the many investments, regulatory reforms and data monitoring efforts work together to deliver tangible benefits that prioritise those with the greatest need. With the ambitious goals set for 2040, establishing well-defined milestones and indicators is essential for effective oversight and course correction. Without these, there is a risk of drift, missed opportunities, or failure to anticipate or respond to unintended consequences and risks.

## Assessing the potential impact of actions on health and health inequalities

The section assesses the 20 actions detailed in the *Housing to 2040* route map for their potential to reduce health inequalities. Our categorisation considered whether actions:

- Included explicit commitments to ensuring an action has an equalising impact; and/or

- Mapped to available evidence suggesting a likely impact on health inequalities at the population level (which was also informed by the size of affected population within Scotland).

Actions we categorised as 'higher potential' more fully met these conditions, whereas those we assessed as having less potential only partially met these conditions. Since the social, policy and research contexts are all evolving, it is important to note that these categorisations were undertaken in Spring-Summer 2025 and that implementation is rapidly evolving. Throughout this report, SHERU aims to stimulate discussion on the connections between housing and health inequalities, rather than present a fixed position or definitive set of proposals. The focus is on opening dialogue and exploring where policy and practice can better align to address these overlapping challenges. We will be following up this national level analysis with an in-depth dive into the implementation of *Housing to 2040* from a local delivery perspective.

# Actions with the potential to help
# improve health and reduce health inequalities

Of the 20 actions in Housing to 2040, we categorised 14 (i.e. the majority) as having potential to help reduce health inequalities. However, all of these remain a long way from being realised. In the next stage of this programme of work, we will delve into local experiences and perspectives of these 14 actions in more detail.

**Action 7: 'review the role of taxation in supporting our *Housing to 2040* Vision',** recognises its potential for taxes focusing on property to help redistribute wealth and reduce health inequalities by helping to reduce Scotland's wide inequalities in household income.

In Scotland, taxation operates across multiple levels, with some powers devolved to the Scottish Government, others remaining with the UK Government. Beyond this, local authorities have responsibility for some elements of council tax and non-domestic rates.

Housing tax reform presents a strategic opportunity to shape the housing market and improve its efficiency through fiscal levers. It also responds to growing concerns about housing wealth as a driver of inequality, highlighting the need for more progressive use of property taxation (36). Within *Housing to 2040*, taxation is approached exploratorily, with limited legislative or delivery components, which reduces its implementation potential. Recent research suggests that housing tax reform is a crucial element of the broader *Housing to 2040* programme goals, yet it has seen little substantive progress so far (36). Policy conversations and dialogue around tax continues to be challenging both within Scotland and within Westminster with recent debates on property tax and tax as whole within the UK (37, 38).

In term of implementation within Scotland, one tangible action has been the recent legislation, of new powers for local authorities to vary council tax on second homes (39). This serves as an important action, recognising the numbers second homes 21,606 recorded in Scotland (40).

More broadly, recent council tax rates have been the subject of increased attention in the context of rising costs for households and increased fiscal challenges within Scotland. Council tax hasn't been reformed for over 30 years; this brings both challenge and opportunity in addressing inequalities (36). Recent research on council tax reform, by the Institute of Fiscal Studies, suggested that previous reforms of the council tax system within Scotland have not been sufficient to tackle regressivity (41). The Fraser of Allander Institute have proposed several options for council tax reforms, such as a proportional property value tax, which was identified as the preferred approach by both the 2015 Commission and the 2006 Burt Commission (33) (42) (43). This analysis suggests that the current approach to

council tax remains 'regressive' with respect to property value where more expensive properties pay a smaller share of their value in taxes (44). This combined with wider exemptions results in inequities as well as challenges in the overcrowding and under occupancy in the usage of residential property (41) (44). In a Scottish Parliament committee session in February 2025, the Fraser of Allander Institute highlighted challenges faced within Scotland on introducing and implementing council tax reform, and the critical need to understand the political barriers to give the Scottish Government and Parliament the confidence to proceed with revaluation (45).

The Scottish Government has recently published their Tax Strategy in December 2024 which has no direct reference to *Housing to 2040* (46). However, the strategy flags property taxation and valuations as key areas and notes an intention to begin discussion of Council Tax Reform, Land and Buildings Transaction Tax (LBTT) in 2025. The Scottish Budget, published in December 2024, introduced an immediate increase for surcharge in land and buildings transaction tax (LBTT) on the purchase of second and rental homes, from 6% to 8% (47).

The Additional Dwelling Supplement (ADS) is an extra charge added to the Land and Buildings Transaction Tax (LBTT) when you buy a second home in Scotland. Taxation on second homes is generally considered progressive and might, therefore, make a small contribution to reducing inequalities in household income. However, this move was criticised by the Scottish Association of Landlords (48) and the Institute of Fiscal Studies, which suggested it was likely to pose challenges for the rental sector (47). This highlights a key challenge facing the Scottish Government as it intervenes in a system in which strong financial interests are at play. The proportion of households in the private rental sector has grown rapidly in the past two decades (49) which means there is an increasing housing policy dependence on private sector landlords. Predicting how landlords will respond to measures that increase their costs (including via taxation) is extremely difficult. Robust evaluation is essential here to understand not only the differential impacts of housing this will have on addressing inequalities, but also how this intervention is impacting and shaping the functioning and outcomes of the housing system. Overall, while broadly welcomed, the tax strategy has been criticised for being insufficiently clear about the *'long-term direction of tax policy itself'* (47).

**Action 8: 'Realise the right to an adequate home in Scotland and deliver equality in the housing system**' is a commitment that clearly centres the ambition of this strategy to address inequalities in housing. The rights-based framing implicitly links this action to the UN Declaration of Human Rights. The UN Committee on Economic, Social and Cultural Rights outlines seven core standards for the right to adequate housing: security of tenure, habitability, access to services, affordability, accessibility, location, and cultural adequacy (50).

Housing is a fundamental human right that affects everyone across the life course and, like other rights, is considered indivisible to other rights, such as the right to health. A rights-based housing policy requires that people not only know and understand their rights but also have meaningful access to justice alongside mechanisms to hold public authorities accountable. Crucially, this also demands sustained investment and capacity-building for duty-bearers to deliver on these rights in practice, preventing violations and ensuring housing systems serve all citizens fairly and effectively (51). Housing is a shared human rights responsibility, meaning that while the Scottish Government plays a central role, local authorities and housing providers also have important duties and obligations to promote and deliver adequate housing. From an implementation perspective this raises vital questions about how to advance housing as a human right via policies that are fair, practical, and capable of securing adequate housing for everyone (3, 50, 51).

The right to housing includes a focus on affordability of housing as well as housing that can help support other rights realisation, such as employment. This focus on rights reflects the broader ambitions of the *Housing to 2040* strategy but it remains far from clear how this action will be achieved.

Within the 2024/2025 *Programme for Government* the intended timeline for the introduction of Human Rights Bill focusing on economic, social and cultural rights was delayed (52). This bill would have brought minimum legal standards linked to UN treaties such as the International Covenant on Economic, Social and Cultural Rights (ICESCR). Civil society actors have expressed concern about these delays and the importance of integrating human rights into decision-making (53). The Scottish Government delayed the bill in September 2024 in the context of the Supreme Court's ruling that the 2021 UNCRC (Incorporation) (Scotland) Bill included sections that went beyond the legislative competence of the Scottish Parliament. The Scottish Government recently published a discussion paper to outline next steps in development and implementation of the bill (54). As this progresses, it will be important to see a clear articulation not only of how a right to an adequate home might be legislated for but how this right will be achieved in practice, in the context of the current housing emergency.

**Action 9:** '**Prevent and end homelessness and eradicate rough sleeping',** offers a significant number of interconnected actions with the potential to contribute to reducing health inequalities. Rough sleepers remain a relatively small sub-section of the Scottish population, with recent figures on homeless applications showing that 1,785 applicants reported rough sleeping during the three months prior to their application (9% of all applications). However, a much larger population is (or may become) at risk of homelessness (42). In the year 2023/24, there were 40,685 homeless applications made to local authorities. Of these, 33,619 households were assessed as being homeless or threatened with homelessness (43). A wider analysis by Engender and Shelter (2024)

highlighted the complex experiences of women facing or at risk of homelessness in Scotland and the need for more effective, inclusive data (28). International evidence also pointed to flaws in how hidden homelessness is measured, noting limited data on key at-risk groups such as LGBTI people, rural communities, and asylum seekers or refugees (26).

The focus on prevention within this action provides a clear upstream approach which, if effective, would reduce inequalities in a key social determinant of health for low-income households. It also addresses an acute need in Scotland, where there are continued increases highlighted in statistics of increases in homelessness applications, families and children in temporary accommodation, and the volume of open cases (55). The multitude of housing emergency declarations as well as these wider trends, further underlines the widespread risk of homelessness and systemic problems being faced in the housing system by low-income households across Scotland.

A core mechanism to achieve this action within the strategy is the introduction of the Housing (Scotland) bill. This bill was underpinned by work through the Homelessness Prevention Task and Finish Group (2023) which highlighted the need for leadership, cultural change, resources, and more housing supply to support its implementation (56). The proposed Housing (Scotland) Bill includes duties to 'Ask and Act' which would extend the duty to prevent homelessness across wider public sector bodies (57). This would look to provide an upstream approach by considering different actors within the system who could support and prevent homelessness. The principle of this approach, which supports broader efforts and consideration as well as shared responsibility of homelessness prevention is important as tool to tackle inequalities and at-risk populations. However, its practical application needs to be effective across the housing system to avoid it becoming a referral approach that further pressurises already underfunded local authority homelessness services, as well as recognising the scale of need currently within wider housing waiting lists (58).

Critical to delivery is a coherent approach to conceptualising and measuring both homelessness and 'prevention' and sufficient resources to implement prevention plans. It is important, therefore, to acknowledge the recent allocation of funding through the Upstream Prevention fund, ahead of the implementation of ask and act duties (59). More cautiously, however, we note that a Finance and Public Administration (FPA) Committee consultation found that the costs of homelessness prevention duties may be significantly underestimated (60). SHERU's local level work to examine the implementation of actions with the potential to reduce health inequalities will be paying close attention to the resources supporting this commitment. Whilst the commitment to ask and act is important for health equity, it is important to note that the continued pressure on housing waiting lists in Scotland. In 2023, approximately one in ten households living in social or private rented

accommodation were on a housing list to move or access a social rented property, according to data from the Scottish Household Survey (49).

The Housing (Scotland) Bill also includes provisions on rental rights, such as having a pet within a property (60). Evidence shows that lack of pet-friendly housing within the private sector can be a major challenge to homelessness prevention since it limits the types of accommodation households with pets can access (61). This issue can particularly affect specific groups, such as women and children fleeing unsafe homes, as noted by Scottish Women's Aid (62). More broadly, provision of pet-friendly housing options may also support people's mental health, following the negative mental health impacts of homelessness (63) as well as evidence that partially suggest pets provide wider benefits for wellbeing (64).

The Bill also proposes stronger tenant rights, including amendments to introduce rent controls and improve accommodation standards. The area of rent controls remains one of the more contested areas of the bill with recent evidence of a 26% reduction in the number of Build-to-Rent (BtR) units over a 12-month period (65). Currently within the Bill, Rent Controlled Areas (RCA's) rents can rise with inflation plus 1%, capped at 6%, with a current consultation on exemptions underway (66). Despite this, rental costs remain a core economic driver of income inequality and create an upward flow of wealth transfer that contributes to economic inequalities and to the increasingly high proportion of household income that private sector rents account for (67). Wider policy interactions such as the freezes on Local Housing Allowance (LHA) rates by the UK Government over the past few years (68) has had wider implications for Scotland. This approach has led to wealth flowing from low-income households to private landlords, with over 40,000 households in Scotland facing rent shortfalls in the final year of the freeze (69). Those on Universal Credit experienced an average annual gap of nearly £1,500, reducing the effectiveness of housing support and increasing financial strain (69). While the Scottish Government continues to provide support within devolved powers, re-linking Local Housing Allowance rates to the 30th percentile of local rents would help ensure they more accurately reflect housing costs. Research indicates that this change could reduce child poverty, with an estimated 75,000 fewer children in poverty by the end of the UK Parliament (69).

The Housing (Scotland) Bill is currently at Stage 3 within the Scottish Parliament, following a record number of amendments (nearly 700) being lodged within the Stage 2 scrutiny process (70). The scale of the bill as it stands offers much opportunity in moving towards a more upstream approach to tackling homelessness within Scotland, with the potential to make a positive contribution to reducing health inequalities. Passing legislation alone, however, will not be sufficient; the impact of the Housing (Scotland) Bill will depend on adequately designed, sufficiently resourced delivery mechanisms to ensure effective implementation to allow the realisation of improved health outcomes.

**Action 1: 'Continue to invest in the supply of affordable homes'** is necessary to realising many of the actions that we categorised as having high potential to reduce health inequalities. However, we have categorised this action as having only 'medium' potential, for now, since its success is contingent on the definition of 'affordable homes', as well as on the actions taken not only to increase the availability of affordable homes across Scotland, nationally, but to ensure their distribution helps address inequalities.

The importance of a home that is affordable is critical for low-income households. Within Housing to 2040 this sees clear quantified commitments (complete 50,000 affordable homes in 2021/22, deliver 50,000 affordable homes by 2027, with a further 50,000 by 2032, with at least 70% of these to be for social rent) (15). This has subsequently been emphasised in the publication of the new *Housing Emergency Action Plan* in September 2025, which discusses a commitment to invest up to £4.9 billion over the next four years, delivering around 36,000 affordable homes by 2029-30 and providing a home for up to 24,000 children (4). This funding is a critical response to the ongoing crisis being faced across Scotland. While this provides some certainty in the funding context, many argue the funding still falls short in relation to need in Scotland. A recent report published by SFHA, Shelter Scotland, and CIH Scotland finds that £8.2 billion would be needed over the next five years to achieve a minimum of 15,693 affordable homes, exceeding what current proposals are intended to deliver (71). Their evidence highlights drivers within the housing system including rising homelessness, more households living in unsuitable private sector accommodation, sharp increases in rent, ongoing affordability challenges, and a reduction in the number of homes becoming vacant within the existing housing stock.

There remains limited transparency regarding the extent to which current funding outlined in the *Housing Emergency Action Plan* represents new allocations versus the reconfiguration of existing Affordable Housing Supply Programme (AHSP) resources, as well as the relative proportions of public and private investment. While Registered Social Landlords (RSLs) have a well-established capacity to attract private finance, the requirement for investor returns can place upward pressure on rents (72). In this context, delivering the scale of social housing required will depend on a sustained and multi-year commitment to increased public investment.

However, without an agreed definition of what an 'affordable home' is, it is hard to track progress with these targets (73) or to consider how much of a contribution this action might make towards reducing inequalities in housing and health. A Scottish Government Housing Affordability Working Group has been established, with the aim of building consensus across a group of stakeholders, and we await the publication of their final report (74). As we set out in a linked publication (2), affordable housing can be understood in different ways, the two most popular of which internationally and in Scotland are house-price-to-income ratio and a ratio based on the proportion-of-income-spent-on-housing (75). Both are

relatively simple measures, and both have important limitations. The first approach, for example, overlooks housing costs for renters, who make up a large share of low-income households in Scotland and face multiple disadvantages. Evidence from the Scottish Government (2020–2023) shows that 44% of individuals in social rented housing and 34% in private rented housing were in relative poverty after housing costs (76). While the second fails to consider the varying size of households or the money required for essential costs, after housing costs are covered. Neither incorporates any measure of housing quality and it's clear that the ambition of *Housing to 2040* is not only to ensure everyone has access to an affordable home but also to ensure that these homes are decent quality.

Another reason for some caution regarding the potential for Action 1 to help reduce health inequalities relates to reductions in the accompanying budget and the inability currently to meet their target. In 2023, cuts to the affordable housing budget were widely criticised and have been linked to delays in delivering around 1,800 new homes (77). The Council of Scottish Local Authorities (COSLA) calculated that a £163 million cut to the Affordable Housing Supply Programme since 2023/24 equated to a 22% real-terms reduction (78). Although the original budget has recently been reinstated, there are concerns that the initial decision to cut the affordable housing budget has damaged long-term confidence. This is evident in a review of the programme, originally scheduled for 2027, which the Scottish Government brought forward to 2024-2025, to assess delivery challenges in the context of 'disruptive socio-economic uncertainty and macro-economic shocks' (79). In this review, stakeholders stressed that reductions across capital budgets had impacted on delivery and confidence with the housing sector (80).

Recent data on quarterly housing building statistics have indicated the scale of the challenge. The latest figures show a sharp decline in the Affordable Housing Supply Programme in 2024–25, with completions down 22%, approvals down 31%, and starts down 21%. These drops mean there is now a high risk that the Scottish Government will not meet its target of delivering 110,000 affordable homes by 2032 or the linked targets on homes for social rent (79, 81, 82).

**Action 4: 'support more community involvement in place-making'** incorporates a commitment to embedding 'community wealth building' in the approach and practices of social housing providers across Scotland by 2025. Community wealth building aims to retain local wealth within communities through initiatives like social enterprises, local procurement, and community ownership of land and assets. A Public Health Scotland-led health impact assessment highlights the potential value of community wealth building as a positive public health intervention that can help reduce inequalities, including by improving access to affordable housing, improving housing quality, and employment opportunities (83). A recent mixed-methods evaluation of community wealth building in Preston likewise finds that this approach has the potential 'to achieve material and social

benefits for local populations through its focus on social determinants (e.g. the economy) and structural health determinants (e.g. redistributing wealth)' (84). However, it also notes that some stakeholders noted a risk of inequalities widening, 'if some groups were more able to benefit than others from the economic opportunities that community wealth building offered' (84). Considering uncertainty about how community wealth building will be rolled out in Scotland, and who it will most benefit, we are cautious about the potential for Action 4 to help reduce health inequalities. While there is clear potential for positive health impacts, without careful design, there is also a risk of inadvertently widening some inequalities.

In contrast to some other actions, concrete steps have been taken to help realise this action, including the recently introduced Community Wealth Building Bill, which is currently at Stage 1 of the Scottish Parliament process (32). If passed, this Bill would place a statutory duty on Scottish Ministers to publish a community wealth building statement, setting out the measures they will take to facilitate community wealth building as well as requiring local authorities and 'relevant public bodies' to publish and implement a community wealth building plan for their area. Furthermore, it would require 'specified public bodies' to have due regard to community wealth building guidance when developing their corporate plans and associated delivery strategies (32).

Whilst this is a useful step in implementation, there has also been emphasis placed on the need for sustained resourcing for local authorities in recognition of the pressures they are already facing (85), which vary by area. There also appears to be a need for more work to engage key stakeholders in the housing sector. Within a Scottish Government consultation prior to the inception of the Community Wealth Building Bill, only 5 of the 148 organisations that responded were social housing providers (86). This suggests that further work is needed to engage key housing system organisations in efforts to develop community wealth building measures that help address inequalities in housing and health. More critically infrastructure for community wealth building varies across types of tenure. Social housing providers have a model of governance that is mandated whereas there are no equivalent governance model or mechanisms for owner occupiers or the private rented sector. While social housing providers in Scotland benefit from the oversight of the independent Scottish Housing Regulator, which enforces standards, accountability, and tenant representation, the private rented sector lacks equivalent governance infrastructure, there is no comparable regulator (87,88). This creates a gap in housing governance, where large parts of the housing system operate without the same level of scrutiny or community representation (89). At the same time, landlords, housebuilders, and landowners are often well-organised and represented through established lobbying networks, further reinforcing imbalances in influence and decision-making across the housing system (90).

**Action 6: 'support housing development in rural and island communities, helping to stem rural depopulation and supporting communities to thrive'** directly addresses the inequalities facing some of Scotland's rural communities. It is underpinned by a targeted £30 million investment in the Rural and Islands Housing Fund and includes a requirement for 10% of the overall affordable homes target to be within rural and island areas (15). Specific housing challenges in rural areas include higher build costs, a loss of properties through second home ownership and empty dwellings, concerns around access to amenities and employment, as well as demographic complexities, including an ageing population (91). More broadly, the provision of healthcare has been identified as one of several challenges linked to rural infrastructure, particularly in relation to the recruitment and retention of qualified staff in these areas (92).

Currently, approximately 17% of Scotland population reside in rural areas but this categorisation is diverse, encompassing both accessible and remote rural areas, with variable challenges for housing (93). In April 2024 secondary legislation was introduced to help councils charge extra council tax on secondary homes, with 29 of Scotland's 32 local authorities applying these charges (39). While this has some potential to contribute to reducing inequalities, the additional charges are currently limited, and data is not yet available to allow us to assess the implementation, and equity impacts of this approach.

In 2023, the Rural and Islands Housing Action Plan (RIHAP) was published, with the aim of helping to drive forward policy commitments for rural areas. Despite the quantified investment to support affordable rural housing, there have been concerns around the allocation of funding and delivery of commitments in practice. Evidence within the Housing Inquiry highlighted implementation challenges with the Rural Housing Key Worker Fund, which were limiting its uptake (21). Evidence from 2024 suggests that just 17 homes have been approved through the demand-led Rural Affordable Homes for Key Workers Fund (7 in the Highlands, 7 in Orkney, 2 in Moray and 1 in North Ayrshire) (94). Concerns have been raised that the definitions of 'rural' currently being applied in national housing funding mechanisms may not adequately reflect the characteristics or needs of rural communities, with some rural areas being excluded or under-prioritized (95).

**Action 10: 'improve accessibility, affordability and standards across the rented sector'** is critical for considering inequalities across both the private and social rented sector. Currently it is estimated around 320,000 households (approximately 13% of households) in Scotland live in private rented accommodation. This represents a reduction in numbers from 2019 (96) but is a large increase from the 120,000 (approximately 5% of households) living in private rented accommodation in 1999 (97).  Related to this is the quality of the stock within this sector posing other risk in health. Private rented sector tenants are the most likely across all tenures to inhabit a property that is in a state of disrepair in relation to

critical elements which are essential to weather tightness, structural stability, and preventing deterioration of the property (98).

Those reliant on the private sector are a diverse population, including families with children, low-income and other vulnerable groups, many of whom face difficulties in accessing other tenures (99). Much of the approach within this action falls within the introduction of the Housing Bill discussed previously. The Bill proposes to remove the rent pressure zone provisions from an earlier Private Housing (Tenancies) (Scotland) Act 2016 (100) and replace them with rent control area (RCA) provisions.

Within a Rent Control Area, rent increases for certain existing and new tenants would be limited, with the aim of improving affordability and protecting tenants from being priced out. This reflects evidence that, when controlling for income, private tenants spend a significantly higher proportion of their income on housing costs compared to other tenures (101,102). The Scottish Government is currently legislating to introduce a permanent rent cap through the Scottish Housing Bill. This will give local authorities the power to cap rent increases to CPI +1% at a maximum of 6%, will not come into force until sometime in 2027 (103).

This follows previous policy interventions around capping rent as a response to the recent cost-of-living crisis, in which the Scottish Government introduced a temporary rent cap, alongside eviction moratorium protections, through the Cost of Living (Tenant Protection) Act 2022, which ended in April 2024 (102). Following this, rent adjudication measures were put in place to support this transition period (102). Subsequent analysis found an eightfold increase in applications to challenge rent increases since the previous year, with the highest number of cases occurring in Edinburgh, Glasgow and Aberdeen (103).

Rent caps have the potential to contribute to ensuring housing is more affordable for low-income renters (104). Given the well-established evidence-base demonstrating that both housing insecurity and living on very low incomes has negative health impacts (105, 106) rent caps also have the potential to help reduce health inequalities. However, concerns have been raised by the Regulatory Review Group that rent controls may have a negative operating impact on landlords which could, in turn, lead to a reduction in the supply of homes for rent and/or landlord disinvestment, which could undermine other policy ambitions, such as the Heat in Building[1] strategy (107). Recognition of wider economic interactions within the housing system, such as rates of local housing allowance (108), are vital to the success of this action for low-income households.  The evidence base for rent controls and market interactions underlines that implementation is context specific so it will be important to monitor and evaluate the impacts of rent control (107, 109).

As a policy solution and approach, rent controls remain a challenging area of policy in terms of both policy design and the implementation in practice. Their long-term effectiveness

depends heavily on thoughtful policy design and clarity around their duration and integration with broader housing system ambitions. Even if limited in scope, rent controls may serve a valuable supporting role within a more comprehensive framework for housing reform.

**Action 11: 'Take action to ensure the housing market operates more fairly across Scotland, providing affordable housing options and choices in all communities'** is an action linked to several policy approaches intended to help improve housing supply and the flow of housing in Scotland. This includes the creation of support packages to help homeowners remain in their homes, to prevent disrepair or empty homes, as well as phasing out the Help to Buy Scheme, and shifting the approach to focus on renovation or adaptation to help improve the energy efficiency of existing homes. The focus of these activities targets homeowners in Scotland, who are significant population group, with home ownership being the most common form of tenure in Scotland, with an estimated 61% of dwellings being owner occupied (110). Actions focusing on the renovation of existing homes in Scotland are important given the known links between poor quality housing and health outcomes (111). Given the size of the cohort of owner occupiers in Scotland (61%), there is significant potential for these measures to support addressing of health inequalities, particularly if they are implemented in ways that support households facing challenges with rising living costs (112).

More recently, to support people to achieve home ownership, the Scottish Government have introduced the Open Market Shared Equity Scheme, which is open to priority access groups. The priority groups include people aged 60 and over, social renters, disabled people, current and recent members of the armed forces, as well as bereaved partners of service personnel within two years of their loss. This allows households to buy a property, with Scottish Government offering a defined contribution percentage share of the cost (113). This approach is intended to make home ownership more accessible. An evaluation conducted on Shared Equity Schemes within Scotland in 2020 found that similar schemes had some level of success in supporting lower income households with home ownership, but concerns were raised about wider beneficiaries who might have purchased without this financial support (114). Whilst there has not yet been any assessment of the health impacts of this specific scheme, wider studies have reported health benefits from home ownership as well as improved health outcomes related to experiences such as affordability and quality of housing and location of housing (131). Recent questions have been asked within the Scottish Parliament about equity of ownership within Scotland and in particular access for young people (21).

**Action 14: 'Adapt and retrofit existing homes to improve their energy efficiency and decarbonise their heating systems'** focuses on a quantified investment of £1.8 billion to improve energy efficiency and decarbonise buildings. This is to be achieved through work to boost housing quality and standards and via clean energy.

In Scotland, there is clear policy focus on decarbonisation with national climate change targets to achieve net zero by 2045, 5 years ahead of the rest of the UK (115). Despite this, progress has been challenging with the interim targets for 2030 of a 75 % reduction being declared by the Climate Change Committee that the Scottish Government would not meet its statutory 2030 goal to reduce emissions (116). The importance of achieving net zero is vital for addressing health inequalities. Current models assessing the health impacts of emission reduction strategies in sectors like energy, transport, food, and buildings often highlight their substantial and well-documented health co-benefits (117). These measures also have the potential to enable more people to live in warm homes that are affordable to heat. This is crucial for health, with a longstanding evidence-base demonstrating that cold housing conditions impact negatively on people's lungs and airways, contributing to illnesses such as pneumonia, as well as negatively impacting on stress, anxiety and mental health (7, 8, 9, 10). This action therefore has clear potential to contribute to improving the health of households that are subject to such improvement.

Work to help achieve this action via retrofit and decarbonising efforts builds on previous energy efficiency work. There has, for example, already been significant efforts to improve the quality of social housing through the Energy Efficiency Standard for Social Housing, which requires homes to reach EPC Band B by 2032 and prevents re-letting below Band D after 2025 (118). This is to be replaced by a new Social Housing Net Zero Standard (SHNZS) which was consulted on in 2023 (119) but is yet to be published (120).

Implementing this action still faces major challenges, particularly around funding and support for work on social homes. The SFHA has raised concerns about the primary funding route for social and existing homes. At present, the Social Housing Net Zero Heat Fund is the main source of grant support, with the Scottish Government covering 50–60% of capital costs for energy-efficiency and clean-heating upgrades. Of the £200 million allocated for the current parliamentary term, only £75 million has been awarded so far, across 80 projects (120). Wider implementation evidence from the Scottish Futures Trust has identified several challenges limiting the ability of social landlords to advance net zero measures. Key barriers include limited grant funding, the need to maintain rent affordability for tenants, and capacity constraints within both landlords and the supply chain. Challenges also relate to tenant perceptions, data gaps on housing stock, and uncertainty around the effectiveness and costs of retrofit technologies (121). In the private sector progress with decarbonising homes is being hindered by ongoing uncertainty around the standards that social landlords and other housing tenures will be required to meet. There is a legislative component to this

action, to be introduced via a Heat in Buildings Bill before May 2026 (123). This will set a target for decarbonising heating systems by 2045 (but will not make replacing heating systems a legal requirement) and will set minimum energy efficiency standards for owner-occupier properties (124, 125).

Since recent data show that 31% of households in Scotland are in fuel poverty, there is clear potential for this action to help reduce health inequalities. However, the fact that the plan is for the minimum energy efficiency standards within the Heat in Buildings Bill to be restricted to owner-occupiers means the impacts are likely to centre on this tenure group, who are more likely to report managing financially well than tenure groups who rent (126, 127). SHERU will therefore be paying close attention to Scottish Government plans to improve the energy efficiency of homes in the private rental sector properties and in social housing.

**Action 12: 'Align the work set out in *Housing to 2040* with the draft Heat in Buildings Strategy so both work together to deliver our targets for climate change and fuel poverty, and the milestones in between, in a fair and just way.'**

**Action 13: 'Aim for all new homes delivered by Registered Social Landlords and local authorities to be zero emissions by 2026'**

These two actions link to Action 14, further illustrating the focus on achieving Net Zero in ways that recognise inequalities. Effective implementation of these measures must be aligned and coherent with other strategic priorities, including addressing the housing emergency through the delivery of new homes, and other core housing challenges. Evidence from Scottish Government has indicted that, from 1 December 2023, all new build or conversion projects by local authorities and Registered Social Landlords (RSLs) applying for grant funding through the Affordable Housing Supply Programme are expected to include a zero direct emissions heating system. Exceptions may be made where there are compelling reasons deemed appropriate by the housing provider, or where a valid building warrant application was submitted before this date (122). Understanding the scope and justification for exemptions is vital to fully assessing the impact and effectiveness of this policy. Clarity on when and why zero direct emissions heating systems may not be required is essential to ensure consistent implementation, support planning decisions, and evaluate progress towards net zero targets. Crucially, this must also be underpinned by a focus on tackling inequalities, ensuring that the transition to net zero does not exacerbate existing disparities but instead contributes to improved outcomes for disadvantaged communities. Aligning decarbonisation with these wider social goals is essential for delivering a fair and inclusive transition.

**Action 18: 'Set tenure-neutral standards so that everyone can live with dignity and in comfort, no matter what tenure they live in'** is intended to apply to both new and existing

properties and designed to ensure that there "would be no margins of tolerance, no exemptions and no "acceptable levels" of sub-standard homes in urban, rural or island communities, deprived communities or in tenements" (123). Whilst this action has a whole of population ethos, there is strong potential for actions to improve living standards to have an equalising impact, given so many poorer households in Scotland are currently living in accommodation that is a long way from dignified or comfortable. For example, Shelter Scotland recently reported that families living in temporary accommodation were experiencing exacerbated existing health conditions due to quality issues with the accommodation (25). However, we are cautious about the potential of this action to contribute to reducing health inequalities in practice, given the scale of the task and the limited progress made so far.

The complexity of the work needed to realise this action, including via enforcement, has resulted in scoping work to better understand the role that housing standards can play, alongside other core areas such as financial support and enforcement. The scale of investment needed to tackle and maintain standards across all forms of tenure is significant and given the long timelines required, it would be helpful to see clearer prioritisation of disadvantaged groups who are most in need of action to be able to live in dignity and comfort.

One aspect of this action that has progressed involves setting timeframes for landlords to address disrepair in the properties they own. In 2025, the Scottish Government announced that it would be supporting regulations to extend Awaab's Law (in England) to Scotland, as part of an amendment to the Housing (Scotland) Bill. Awaab's Law developed in response to the tragic case of Awaab Ishak in England, who died in 2020 from mould exposure in the house he was living in. This legislation will impose timeframes on social landlords to investigate disrepair and start repairs (124). This has been subsequently updated within the Housing Emergency Action Plan with the intention to start this in March 2026 subject to parliamentary approval (4). This will extend existing legal protections for social tenants such as the Scottish Housing Quality Standard and the Right to Repair Scheme. Whilst this is an important step, evidence from Citizen Advice Scotland 2025 suggests that enforcing repairs based on existing standards and regulations can be challenging and the need for measures to be applied jointly across the social and private rented sector, therefore raising some key challenges in relation to this law its design and implementation.

Earley et al (2025) highlight important implementation challenges, noting that while many tenants are aware of their legal rights, concerns about limited housing options and potential negative consequences can make it difficult to engage with enforcement processes. Responsibility for addressing non-compliance often falls to local authorities, whose limited resources constrain effective oversight, despite the existence of tools such as licensing and civil penalties. These mechanisms remain underused, even though they are designed to be

self-financing. The authors argue for a more proactive approach that complements enforcement with quality assurance measures, requiring coordinated action at both the policy design and implementation levels (125).

**Action 19: 'Bring digital connectivity to homes, tackling the digital divide'** reflects the increasingly critical role that digital platforms play in people's ability to access core public services and participate fully in key aspects of daily life, including employment. Inadequate access to digital infrastructure and services can exacerbate health inequalities by limiting low-income households' ability to access and engage with essential resources such housing services and support, education, healthcare, social security, and labour market opportunities (126, 127). Evidence of implementation in this area has found that requirements for digital connectivity has been incorporated as a grant condition and the guidance of the Affordable Housing Social Supply programme (122). However, infrastructure is only one component of achieving meaningful digital connectivity. To enable low-income households in Scotland to fully benefit from digital connectivity, these infrastructure changes need to be accompanied by support with digital literacy, confidence in using technology, and the availability of appropriate devices (126).

**Action 20: 'Ensure that everyone who wants to, is enabled to live independently in a home of their own'** recognises the importance of housing for people with disabilities and long-term health conditions, as well as Scotland's ageing population. This action involves vital planning for the infrastructure developments needed to address changing population needs, which includes altering the types of houses available. Underpinning sub actions include the introduction of a Scottish Accessible Home Standard and further integration of housing within health and social care, including the implementation of a joint outcome and accountability framework. Given the scale of people living with disabilities and long-term health conditions in Scotland, as well as demographic ageing, this action has clear potential to help reduce health inequalities. Evidence from the 2022 census in Scotland found that the percentage of people within this survey reporting a long-term illness, disease or condition increased from 18.7% in 2011 to 21.4% (128).

However, we remain cautious about the potential for this action to contribute to reducing health inequalities because of uncertainties around resourcing the necessary changes. In 2024, the housing adaptations budget faced reductions, which have inevitably had adverse consequences for the realisation of this action, and seem likely to have exacerbated the challenge of long-term hospital stays that are leading to pressures within the health service (129). Whilst the budget on adaptations has been subsequently restored (130), as with the affordable homes budget, the reduction has creating uncertainty for stakeholders working in this space. If the Scottish Government is to achieve its ambition of ensuring everyone who wants to live independently can do so, then the investment and sustainability of secure funding to support the scale of work required will be essential.

# The potential of other actions in *Housing to 2040* to contribute to reducing health inequalities

We categorised the remaining six actions as having lower potential to help reduce population level health inequalities. All six actions are important for improving Scotland's housing system, through addressing broader infrastructural systems and longer-term planning, including of the supply chains and construction skills needed to achieve some of the earlier actions. However, while all could positively benefit health, the impact of each of these actions on health inequalities is less certain and, at the very least, may take a long time to be realised. While several actions offer potential benefits to low-income groups, generally across these actions there is little sense that the lowest income deciles will be prioritised and/or limited evidence of progress with implementation:

> **Action 2: 'Develop approaches and test new models to attract and accelerate private investment in housing programmes and projects and in the transition to decarbonised heat'** [not quantified]
>
> **Action 3: 'Support the delivery of homes in town centres and at the heart of communities by developing vacant and derelict land'**
>
> **Action 5: 'Shift the planning system to be more directive about the quality of places, including where new development should happen and how those developments can deliver more for new and existing communities, including for 20-minute neighbourhoods'**
>
> **Action 15: 'Modernise housing construction, particularly through offsite construction'**
>
> **Action 16: 'Build the strong local supply chains needed to decarbonise Scotland's homes' and contribute to green recovery.**
>
> **Action 17: 'Grow the skills needed to deliver energy efficiency and zero emissions heating systems and support an increase in the use of offsite construction'.**

Measures such as modernising construction, aligning national strategies, and strengthening planning systems are important upstream interventions that contribute to prevention and have a role to play in addressing health inequalities over time. However, their short-medium term impact on those already living in poor housing or facing challenges in access or affordability of housing remain less clear.

Efforts to increase housing supply remain vital, with value in the reuse of vacant and derelict land to improve local environments and support public health. However, implementation

has faced persistent challenges, particularly around funding. For 2024/25, a 27% reduction in capital funding for community-led regeneration to £45.8 million has led Ministers to pause both the Regeneration Capital Grant Fund (RCGF) and the Vacant and Derelict Land Investment Programme (VDLIP), suspending new project approvals and limiting delivery capacity (122).

## Policy coherence within *Housing to 2040* and beyond

The 20 actions set out in *Housing to 2040* all offer some potential to improve housing experiences in Scotland and, therefore, to improve the multiple health outcomes linked to housing. Between them, these actions constitute ambitious plans to transform Scotland's housing system, improving the access and affordability of housing, addressing the needs of specific populations, and supporting the transition to a greener Scotland. There is also clear potential, and intent, to ensure housing system improvements help reduce health inequalities. However, these achievements all depend on effective, sufficiently resourced implementation. Whilst all the actions have the potential to improve housing experiences in Scotland, and many are intended to help reduce inequalities, the potential for contributing to reducing health inequalities at the population level depends not only on effective implementation but also on a consistent prioritisation of those with the greatest need.

Since there are multiple, intersecting social determinants of health, there is also an ongoing need to ensure broader policy coherence (e.g. ensuring improvements in housing also support employment policy goals). Examining how *Housing to 2040* is reflected in other Scottish Government strategies that are shaping key social determinants of health, such as employability and poverty, highlights the importance of policy alignment. Our analysis suggests that *Housing to 2040* is currently referenced inconsistently across strategies addressing these other social determinants. For example, *No One Left Behind: Employability Strategic Plan 2024–2027* only briefly mentions housing and does not directly reference *Housing to 2040* (132). In contrast, the *Child Poverty Delivery Plan 2022–2026*, underpinned by the Child Poverty Act 2017, integrates *Housing to 2040* more fully, recognising housing as a key factor in tackling poverty (133). Work being conducted within SHERU will explore these connections in more detail, including in relation to local implementation, with a view to better understanding how major Scottish Government policies are collectively shaping the social determinants of health in Scotland.

# Conclusion

*Housing to 2040* is an ambitious policy strategy that sets out a positive vision of a housing system, with clear potential to contribute positively to population health and wellbeing. However, its delivery is taking place in a highly pressurised context. This includes a declared national housing emergency in Scotland, 13 locally declared housing emergencies, and extensive scrutiny of key legislative developments, such the Housing (Scotland) Bill, the Community Wealth Building Bill, and the forthcoming revised Heat in Buildings Bill. The wider context of the Scottish Government's Public Sector Reform Strategy, with its emphasis on efficiency, integration, and fiscal sustainability and the Population and Health Framework, also shapes the implementation environment, creating both opportunities for closer alignment of housing with health and social care and a focus on prevention.

Our analysis suggests there is an inconsistent approach to prioritising inequalities in action on housing, despite the strategy's stated ambition to do so. While there is a focus on the lowest-income groups for some actions, there is often a lack clarity as to how prioritisation will be achieved in practice. In addition, all actions that we categorised as having higher potential to contribute to reducing health inequalities are facing implementation challenges. Clearer measures and definitions are essential for monitoring, evaluation, and implementation, especially around the definition of affordable housing, where there is currently substantial in practice variation as we discuss in our linked publication (2).

Overall, the evidence suggests a welcome ambition to radically improve housing in Scotland but paints an uneven picture of progress. This reinforces the recent call in the Scottish Parliament's Housing Inquiry 2025 for a clear implementation plan for *Housing to 2040*. A more critical examination of current housing objectives and delivery is needed to fully assess their likely impact on health and the persistent inequalities currently shaping lives across Scotland.

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# Scottish Health Equity Research Unit

Insights, analysis and action on the socio-economic factors that shape health

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