

Schedule 4 – Natural Places

Respondent	Comments	Response
<p>Woodland Trust Scotland <i>Hannah Patterson</i></p>	<ul style="list-style-type: none"> - Notes that there are 16 SSSIs in West Lothian and that the assessment years for each varies significantly. Suggests that NatureScot’s website https://www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/site-condition-monitoring/how-we-monitor-features should be referenced to help inform monitoring intervals. - Notes that there are 51 Geodiversity Sites and 121 Biodiversity Sites in West Lothian and that there should similarly be information about how these sites are assessed and how often. - Notes that sites are liable to change over time depending on assessments. - Suggests that for clarity, ‘countryside’ should be given a definition. - Queries whether Figure 8 (Map showing the countryside of West Lothian in green) represents the designated countryside belt or the current coverage of ‘countryside’? If the latter, this needs to be allocated a specific timeframe as this is likely to change in response to wider development. - Notes the omission of a document reference number at para 2.8 - Suggests adding a clearer description of the difference between the ‘Countryside Belt’ and 	<p>Reference to NatureScot monitoring intervals added. Grouping of paragraphs 3.3 to 3.5 noted, clarified wording of 3.3 to avoid disrupting flow of existing paragraph order. All other comments noted. Referencing to be fixed as Evidence Report is finalised.</p>

	<p>the 'Green Belt' management and/or protection of these areas.</p> <ul style="list-style-type: none"> - Notes the omission of a document reference number at para 2.11 and suggest that hyperlinks to the studies are also provided. - Suggests adding a definition of greenfield sites at para 3.3. - Suggests moving para 3.3 to after para 3.5 so that all NPF4 references are grouped together and then followed by the WLC's guidance considering policy 5 (a) - Suggests a comparative figure is provided at para 4.4 to put the West Lothian emissions in context. 	
<p>Scottish Forestry <i>Will Chadwick</i></p>	<ul style="list-style-type: none"> - Agrees that the Schedule is sufficient. - Notes that this schedule cross-references the previously consulted Schedule 6, Forestry, Woodland and Trees and that schedule adequately outlined relevant policies, including NPF4 and the Scottish Government's Control of Woodland Removal Policy. 	Noted.
<p>Winchburgh Developments Limited (WDL) <i>Robin Matthew (PPCA)</i></p>	<ul style="list-style-type: none"> - Agrees that the Schedule is sufficient subject to the following comments. - Winchburgh Developments Limited has, as part of the ongoing strategic expansion for Winchburgh, delivered open space provision as part of the organic growth of the settlement including the restoration of Auldathie Park as well as a strategic landscape framework. Individual development blocks also provide for useable natural open space as does infrastructure such as the new M9 motorway junction. 	Noted.

<p>Key Agency - Scottish Water <i>Dave Bissett</i></p>	<ul style="list-style-type: none"> - Scottish Water is generally supportive of the evidence set out within this Topic Schedule and agrees that it provides an appropriate baseline for natural places and soils in West Lothian. - However, it recommends that the Proposed Plan strengthens the integration between soils, land use and the water environment, particularly in relation to Drinking Water Protected Areas, catchment management and diffuse pollution risks. Early consultation with Scottish Water should be emphasised where development may affect protected catchments or water infrastructure. 	<p>Noted.</p>
<p>Homes for Scotland <i>Finn Watkins</i></p>	<ul style="list-style-type: none"> - It is suggested that 'Updated Scottish Government Policy on 'Protecting Ramsar Sites' (2025) requires to be considered. - The respondent argues that the Council must balance environmental protections with its housing crisis when deciding where to build. It connects three critical planning elements: The Conflict: NPF4 Policy 4 strictly protects Local Nature Conservation sites unless development impacts are minor or overridden by national-level benefits. The Shift: Following the 2025 Chief Planner letter, the declaration of national and local housing emergencies means biodiversity policies no longer automatically override housing. Instead, there is a requirement for them to be weighed equally "in the round". The Solution: To meet its Minimum All Tenure Housing Land Requirement (MATHLR), the council must prioritize marketability and 	<p>Noted. The site appraisal methodology will be used to consider the impact of development of sites for housing on the natural environment. This is one element of the site appraisal that will be weighed alongside other impacts, constraints and the need to meet housing requirements.</p>

	<p>deliverability, choosing sites where developers can actually build and where people want to live, even if those sites border sensitive landscape areas.</p> <p>Landscape Designations</p> <ul style="list-style-type: none">- It is argued that landscape and biodiversity designations must not automatically block housing delivery in high-demand areas.- Strict landscape designation should not push development into low-demand areas where housing could sit unsold or unbuilt. A site in a protected landscape may still be the most viable (marketable) location to build if that is where the infrastructure exists and there is a demand from people wanting to live there. <p>Soils</p> <ul style="list-style-type: none">- It is suggested that a Construction Environmental Management Plan (CEMP) can enable a planning authority to mitigate development risks on peat and high organic rich soils through enforceable, planned controls. <p>Agricultural Land</p> <ul style="list-style-type: none">- The respondents reference the tensions in Scottish planning policy between protecting valuable agricultural land and recognising the significant economic benefits of home building.	
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	<p>NPF4 strictly controls development on prime agricultural land (or culturally/locally important lesser-quality land). It states that development proposals will only be supported if they meet three specific criteria:</p> <ol style="list-style-type: none">(1) Essential infrastructure: The project must be categorized as vital infrastructure.(2) Locational need: There must be a specific reason it has to be built in that exact location.(3) No alternative: No other suitable, lower-quality site must be available <p>- There is criticism of the Topic Schedule not identifying any scenarios where development would be supported and attention is drawn to the substantive socio-economic returns which housebuilding makes. According to the March 2022 Homes for Scotland (HFS) report, the sector's 2019 impact included demonstrated that house builders contribute millions of pounds annually to district-wide infrastructure., that every single home built supports 3.5 jobs in the economy, that the sector supported 79,200 jobs in 2019, which breaks down into 45,000 direct jobs, 24,750 indirect jobs and 9,450 induced jobs. Reference is made to the Homes for Scotland publication 'The Social and Economic Benefits of Home Building in Scotland'.</p> <p>https://homesforscotland.com/download/the-social-and-economic-benefits-of-home-building-in-scotland/</p>	
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Schedule 6 – Countryside Belts

Respondent	Comments	Response
<p>Rick Finc Associates <i>Rick Finc (Mr S Burnside and Cadzow Estates)</i></p>	<ul style="list-style-type: none"> - objects to the timing and completeness of the provided evidence while formally contesting the local application of national green belt policies. - This representation criticises the West Lothian Landscape and Countryside Belt Review, arguing that its baseline data is flawed and its policy distinctions are unclear. The client explicitly reserves their planning position until these fundamental methodological issues are resolved by West Lothian Council. - The respondent seeks assurance that the designation of countryside belts to Green Belts is clearly justified and notes that the findings of the review and any factual information of the countryside edge boundaries will be critical. 	<p>Comments noted. The aim of the West Lothian Landscape and Countryside Belt Review is to inform a review of the LDP1 landscape and countryside belts policies. The findings of the studies will be used to inform the proposed plan. Engagement at this stage is on the scope of the studies to be carried out.</p>
<p>Woodland Trust Scotland <i>Hannah Patterson</i></p>	<ul style="list-style-type: none"> - With regard to the statement ‘it is recognised that there is a difference between the two policies which needs to be resolved’ it is requested that the differences between Countryside Belts and Green Belt designation is provided. This should also outline the immediate and long-term impacts of the possible use of Green belts rather than countryside belts going forward. - At para 2.7 there is reference to two additional Landscape Sensitivity Studies but no mention of when they will be available and how they will be integrated into LDP2. - Suspects that there is a risk of confusion of a ‘Lothian’s Green Belt’ which already exists? 	<ul style="list-style-type: none"> - Noted, this has been added to the schedule. - These studies will support future Planning Guidance on Renewable Energy and the Forestry and Woodland Strategy. - Comment noted, text amended to clarify.

	Clarification as to whether West Lothian is incorporated within this or becomes an extension of rather than independent from?	
Scottish Forestry <i>Will Chadwick</i>	<ul style="list-style-type: none"> - Agrees that the Schedule is sufficient. - Notes that this schedule cross-references the previously consulted Schedule 6, Forestry, Woodland and Trees and that schedule adequately outlined relevant policies, including NPF4 and the Scottish Government's Control of Woodland Removal Policy. 	Comments noted.
Miller Homes <i>Michael Westwater (Geddes Consulting)</i>	<ul style="list-style-type: none"> - Disagrees that the Schedule is sufficient. - Welcomes the Landscape and Countryside Belt review but objects to the methodology, and requests the opportunity to comment on the finalised document, with the Council taking account of feedback. - It is suggested the framework contains fundamental flaws conflicting with national planning policy; the methodology should be revised so LDP2 is based on sound, comprehensive, legally compliant evidence. - Limiting the assessment to existing Countryside Belt boundaries is unjustified, lacking the holistic evidence needed for a new strategic designation under NPF4 and risking Green Belt on highly sustainable sites. - The "Pressure for Unsustainable Development" criteria fail to align with NPF4 Policy 15: penalising sustainable high-potential areas, relying on superficial indicators rather than strategic sustainability, and failing to review call for sites submissions against local living principles. 	<p>West Lothian does not currently have a green belt. The aim of the West Lothian Landscape and Countryside Belt Review is to inform a review of the LDP1 landscape and countryside belts policies to gather evidence on whether the landscape designations are up to date, and whether the countryside belts are in essence de-facto green belts and can be designated as such in the LDP2. There is no proposal to designate a strategic green belt across West Lothian.</p> <p>The findings of the studies will be used to inform the proposed plan. Engagement at this stage is on the scope of the studies being carried out.</p> <p>In relation to the criteria used to assess "Pressure for Unsustainable Development", NPF4 policy on green belt aims to ensure that 'Development is directed to the right locations, urban density is increased and unsustainable growth is prevented'. This criteria evaluates this. Assessment of local living is being carried out as part of a parallel process, the assessment of which will be compared</p>

	<ul style="list-style-type: none"> - The assessment criteria (pages 14–21) rely on a static landscape baseline, ignoring the potential of edge-of-settlement development and strategic master planning to deliver environmental enhancements. - The boundary criteria fail NPF4 requirements for strong, defensible boundaries; minor roads, walls, garden boundaries, tree lines, hedgerows, minor watercourses and topographic shifts are not robust enough. - Requests a more proactive, positive methodology: assessing the dynamic settlement–rural relationship, considering call for sites representations against local living/20-minute neighbourhood principles, and recognising that sensitive development under clear briefs can catalyse long-term improvement where landscapes underperform. 	<p>against the countryside belt/green belt assessment when carrying out the site appraisal methodology.</p> <p>Other comments on the methodology are noted in respect of housing developers promoting their sites which are currently either located on the edge of settlements and or within countryside belts as being locations for sustainable growth. The landscape assessment, green belt study, local living assessment, transport appraisal and other infrastructure appraisals will be used in combination to assess potential sites for the proposed plan.</p>
<p>Winchburgh Developments Limited (WDL) <i>Robin Matthew (PPCA)</i></p>	<ul style="list-style-type: none"> - The respondents are critical that no evidence has been provided to show that “there is a significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside” as required by National Planning Framework 4 Policy 8. - There is no evidence of that through planning applications or appeals in West Lothian. There is no need to use a Green Belt designation when existing designations have carried out their functions successfully. - The Landscape and Countryside Belt Review required to inform this process has not been completed so it is premature to suggest that a 	<ul style="list-style-type: none"> - NPF4 policy on green belt aims to ensure that ‘Development is directed to the right locations, urban density is increased and unsustainable growth is prevented’. Criteria 1 of the assessment evaluates this. - Comment noted. The assessment will evaluate the impact of planning appeals over the lifetime of LDP1. - There is currently no proposal to designate a green belt for West Lothian. The aim of the studies is to bring landscape evidence up to date and to provide evidence to assess whether the extant countryside belts could be designated as green belts.

	Green Belt designation is appropriate for the West Lothian Council area.	
Key Agency - Scottish Water <i>Dave Bissett</i>	<ul style="list-style-type: none"> - Scottish Water has no objection to the evidence base. - Scottish Water agree with the evidence presented in this Topic Schedule and considers that it provides an appropriate and proportionate baseline for understanding the current role of Countryside Belts and the potential for Green Belt designation in West Lothian. The schedule appropriately reflects the intent of NPF4 Policy 8, including the use of Green Belt (or equivalent designations) as a settlement management tool to guide spatial strategy and restrict unsustainable growth. 	<ul style="list-style-type: none"> - Noted
Barratt Redrow, Miller Homes and Taylor Wimpey <i>Joe Larner</i>	<ul style="list-style-type: none"> - Notes West Lothian does not currently have a Green Belt and, referencing NPF4 Policy 8 (Green Belts will not be necessary for most settlements), suggests maintaining the status quo. - The Council is charged with failing to clarify the policy difference between countryside belts and green belts; any consultation is premature in advance of sight of the complete, updated review documentation. - Contends Green Belts are a focused development management tool for managing development around cities, designated on this basis rather than any specific environmental qualities. - The Countryside Belt Review Methodology overextends its scope by incorporating land capability, flood mitigation and settlement boundaries into its green belt criteria, conflicting with the intended policy scope of NPF4. 	<ul style="list-style-type: none"> - Noted - Comment noted, text amended to clarify. - NPF4 policy on green belt states they are To encourage, promote and facilitate compact urban growth and use the land around our towns and cities sustainably. They are not just for use around cities. - Green Belt policy includes the policy aim of Nature networks are supported and land is managed to help tackle climate change. - Other comments on the methodology are noted in respect of housing developers promoting their sites which are currently either located on the edge of settlements and or within countryside belts as being locations for sustainable growth. The landscape assessment, green belt study, local living assessment, transport appraisal and other

	<ul style="list-style-type: none">- The LUC methodology is deemed overly expansive, unbalanced, and fails to consider opportunity costs, specifically how restricting housing where demand is highest negatively impacts sustainable development and national climate change objectives.- The LUC criteria rely on a flawed assumption that existing pressure for residential development is automatically "unsustainable", misinterpreting the policy intent of NPF4 and Local Development Planning Guidance.- Sustainable, well-connected locations can also attract development pressure that supports sustainable growth; Call for Ideas submissions should be reviewed on this basis, and suburban styles of development are irrelevant and should be removed from the assessment criteria.- Rigid Green Belt designation causes negative environmental and socioeconomic "leapfrog" effects, undermining Scotland's climate change goals by forcing development away from primary employment hubs; appropriate land release will be required.- Research in an English context shows restrictive approaches to new housing adversely affect affordability; given West Lothian's declared Housing Emergency, further restrictions likely to drive up prices are not considered desirable.- Suggests changing Countryside Belt to Green Belt is an admission that Countryside Belt has no basis in national policy, and the current designation should be entirely removed as NPF4 provides no basis for it.	<p>infrastructure appraisals will be used in combination to assess potential sites for the proposed plan.</p>
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<p>Homes for Scotland <i>Finn Watkins</i></p>	<ul style="list-style-type: none"> - While the respondents agree that the Schedule is sufficient they do nevertheless provide comments and additional evidence. - HFS welcomes the commission of the West Lothian Landscape and Countryside Belt Review but requests access to the draft before it is submitted to the Gate Check. - Concerns that the three studies being undertaken runs the risk of conflation between these distinct tools and policy matters. - Balancing sustainability and marketability is the only way a Spatial Strategy can successfully deliver homes and address the housing emergency. - It is argued that housing development acts as a major driver for local economic growth and community welfare and that housebuilders are essential financial contributors to local infrastructure, environmental sustainability, and overall social well-being. 	<ul style="list-style-type: none"> - Noted - The schedule sets out that the draft Landscape and Countryside Belt study is to be finalised for August 2026, to inform the proposed plan. - The three studies are being prepared in parallel. However, the updated landscape studies aim to inform countryside belt study by bringing landscape information up to date first. - Other comments on how housing development acts as a driver for growth are noted. -

Schedule 9 – Indicative Housing Land Requirement

Respondent	Comments	Response
<p>Homes for Scotland</p>	<p>Housing Need and Demand</p> <p>HFS are concerned the assessment of existing need in HNDA3 is too narrow. It is failing to pick up households in precarious situations who subsequently become homeless. A broader definition of existing unmet need is required. HFS note that the Tayside Authorities' HNDA was informed by survey data and produced an existing unmet need figure of over 7 times their initial HoTOC figure.</p> <p>The understanding of unmet need could be improved by also considering those living in homes that are physically unfit; households in homes that are not affordable to them; households in unsuitable homes (e.g. families without outdoor space); concealed households; overcrowded households; and those on waiting lists for affordable housing.</p> <p>It is understood an updated Housing Need & Demand Assessment (HNDA) methodology will be published in late June by the Centre for Housing Market Analysis and will include wider definitions of need. WLC is urged to review this once published and if a lower iLHLR is proposed at Gate Check, use the updated HNDA approach to inform the LHLR in the Proposed Plan. As with recent household projections the most recent evidence should be used to inform housing</p>	<p>The Gate Check Reporter raised concerns regarding the robustness of applying national overcrowding percentages directly to local circumstances.</p> <p>The Reporter concluded that:</p> <ul style="list-style-type: none"> • the application of a simple national percentage to West Lothian was not sufficiently robust or credible; and • reliance on such an approach would depart from established methodology without a sufficiently robust evidence base. <p>Scottish Government Evidence Report guidance (February 2026) similarly advises that care should be taken not to undermine established methodologies, particularly in relation to overcrowding.</p> <p>When the Council carries out a new HNDA, it can consider any new methodology.</p> <p>The response does not put forward a specific calculation that is transparent and understandable. Neither does the response include a clear source or a robust approach that meets the expectations of Scottish Ministers that can be incorporated into the Evidence Report.</p>

	<p>numbers on the emerging plan regardless of what stage of preparation the Council is at.</p>	
	<p>Delivery of Market Housing and Land Supply</p> <p>The draft Topic Paper refers to work undertaken by the Scottish Government which stated that there are approximately 164,000 unbuilt homes in Scotland which had been granted consent and across the Glasgow and Edinburgh City Regions, there are around 114,000 unbuilt homes. HFS has published analysis of housing land supply in March 2026 which found that of the 164,000 homes, 113,879 (69%) are in control of builders and 85,836 have detailed or approval of matters specified in condition consent. Of these 85,836, 64,532 are already under construction. The data behind HFS' analysis was shared with the Council on 3rd April 2026 and contains a West Lothian specific review of the deliverability of the current land supply. Forecast completions are detailed in the following graph:</p>	<p>Add analysis to evidence list.</p> <p>It is unclear how the evidence should inform the iLHLR, however, the methodology seems to deviate from Scottish Government guidance on Housing Land Audits and classifies (1) land not under the control of home builders and (2) homes have detailed or approval of matters specified in condition consent as constraints.</p> <p>This paints an unrealistic and over pessimistic picture that assumes that over the plan period there will be no land sales to home builders and detailed consents granted.</p>
	<p>Moreover, research recently published by Savills shows that land values in Scotland are increasing due to a lack of supply. If insufficient land is allocated in the emerging LDP for housing, land values will increase and by default the price of new homes. This will compound the housing emergency within West Lothian.</p>	<p>Land values are usually calculated on a residual basis, rather than the land value determining the house prices.</p>

	HFS support the use of the updated National Records of Scotland 2022-based household projections to inform the indicative Local Housing Land Requirement (iLHLR).	Noted.
	HFS do not support the indicative iLHLR being set at 10,825. The previous Evidence Report set an iLHLR of 12,500 which considered a wider definition of existing need by including all those households that fail the bedroom standard as defined in the Housing (overcrowding) Act 2003 as opposed to having to be both overcrowded and concealed. Whereas the updated evidence report does not include the same wider definition. HFS consider given the national and local housing emergencies, it is important that WLC retain the wider definition of need used to inform an iLHLR of 12,500.	See above of the reasoning the wider definition of need was not carried forward.
	As outlined above, the iLHLR of 12,500 was not disputed, rather the Reporter sought more justification for the figure. Since the previous Gate Check review, the Scottish Government has published guidance which outlines that policy ambitions can be used to determine the iLHLR alongside updated data and projections. HFS consider providing more context about WLC's policy ambition would help to justify a higher iLHLR	The Topic Schedule already sets out the Council's policy ambitions. Homes for Scotland does not identify any specific additional information that should be included.
	<i>Methodology</i> HFS note that the iLHLR has been informed by land supply data from the 2025 HLA. HFS are concerned	A 25% flexibility allowance is built into the baseline requirement. This represents a contingency of land to allow for changes in sites coming forward.

	<p>that the draft Topic Paper does not consider the difference between programmed and actual housing completions in West Lothian.</p>	
	<p>HFS query whether the deliverability of the existing supply within the HLA or sites proposed through the Call for Sites exercise been considered? It may be appropriate to de-allocate some existing sites. The Council is urged to engage and work with the home building sector to ensure that all homes in LDP2 are deliverable.</p>	<p>Yes, deliverability will be a key consideration of the Site Appraisal Methodology.</p>
	<p>HFS do not support the methodology set out in this Topic Paper to address the affordable housing gap. The pressures in the affordable sector cannot be reasonably separated from those in the private sector and new market homes play a significant role in bringing forward land for affordable homes.</p> <p>Have the Council considered how the additional homes will be delivered if they are not part of an all-tenure consent? HFS note that the proposed methodology is not aligned with the all-tenure approach to the iLHLR outlined in NPF4. We also note that the methodology WLC have used is not consistent with other Councils' approaches and therefore has not been tested at Gate Check.</p> <p>HFS consider the affordable housing gap could be addressed through setting an iLHLR of at least 12,500 (as set in the 2025 WLC Evidence Report). A range and choice of deliverable sites across West Lothian</p>	<p>The schedule in the Benchmarking and Delivery section sets of the full range of delivery options for affordable homes. This includes sites purely for affordable homes and the role of mixed tenure sites in delivering affordable housing.</p> <p>The MATHLR, as set out in NPF4 is all tenure. There is no nationally agreed iLHLR methodology, or guidance that the iLHLR needs to take an all-tenure approach.</p> <p>Scottish Government advice (February 2026) explicitly sets out that policy ambitions, including those set out in Local Housing Strategies, Strategic Housing Investment Plans, and local housing emergency action plans, can support an iLHLR above the MATHLR. The advice acknowledges that such ambitions <i>"may be less directly quantifiable in terms of a precise number drawn from an established evidence source or primary data but may still support</i></p>

	<p>combined with an affordable housing policy would enable WLC to meet the affordable housing supply target of 310 units per annum from the Local Housing Strategy (LHS) and deliver necessary market housing to meet the all-tenure requirement. We note this approach to set the iLHLR based on the target within the LHS would be consistent with the approach used in the South Lanarkshire Council Evidence Report which has been approved.</p>	<p><i>an ambitious approach.</i>" This provides a clear policy basis for the Council to draw on its affordable housing emergency declaration and affordable housing delivery programme as drivers for an iLHLR above the MATHLR.</p> <p>The council's evidence base has identified a need for delivery of further affordable homes above the baseline supply. The council's approach is to apply an affordable housing uplift to the iLHLR purely with the aim of delivering more affordable homes, the uplift is applied after the flexibility allowance as including additional homes in the iLHLR that are not evidenced as necessary would commit the Council to identifying and delivering infrastructure capacity for market homes that the evidence base does not support.</p>
	<p>Conclusion</p> <p>HFS acknowledge the difficult timing of the WLC Evidence Report being rejected in November and new guidance coming out in February. However, the iLHLR set out in this Evidence Report is not ambitious enough to address both the local and national housing emergencies. HFS are also concerned that the methodology is not aligned with the all-tenure approach outlined in NPF4 and has not been used elsewhere or tested at Gate Check. HFS consider the West Lothian iLHLR should be set at 12,500 at minimum.</p>	<p>Conclusions noted.</p>

West Lothian Climate Action Network (WLCAN)	The revised Version 2 schedule provides a substantially expanded and more transparent evidence base regarding the proposed indicative Local Housing Land Requirement (iLHLR) for West Lothian.	Noted
	While the overall direction of the schedule is welcomed, several areas could still be strengthened.	The Evidence Report requires to take a proportionate approach. The respondent does not identify any specific inaccuracies within the evidence base nor identify any significant or specific additional evidence requirements. No changes made.

David Sutherland	<p>The evidence references healthcare provision and states “The assessment found that in nearly all practices there is sufficient capacity within current staffing levels to accommodate the housing growth proposed under LDP2”. However, it does not illustrate clearly enough that Winchburgh sits within a red zone for healthcare provision and therefore does not have any further capacity for housing allocation without this being addressed.</p> <p>It should be categorically made clear within the evidence that Winchburgh is at capacity, with no additional allocation for housing under LDP2 possible unless critical issues are addressed in healthcare provision, train station etc etc.</p> <p>Your evidence states “In 2 practices there is clearly a requirement for additional capacity while a further 2 practices require further investigation of service delivery and infrastructure availability to explore whether additional capacity is required. Some practices have capacity to accommodate additional housing allocations while in other areas this could only be supported with additional</p> <p>infrastructure investment.” It is crucial that LDP2 stands by this, and this means no additional housing allocation should be proposed in Winchburgh in LDP2.</p>	<p>Para. 3.114 sets out that Winchburgh has a RAG scoring of red.</p> <p>The representation does not identify any factual inaccuracies in the underlying Healthcare Capacity Assessment. Rather, it expresses a view on the planning implications of the evidence and the appropriateness of future housing allocations in Winchburgh. Decisions regarding the scale and location of future development will be considered through preparation of the Proposed Plan. No additional evidence sources have been identified. No changes made.</p>
Winchburgh Development Ltd	Whilst Winchburgh Developments Limited supports the fact that the proposed indicative Local Housing	Noted

	Land Requirement (IHLR) is larger than the Scottish Government MATHLR, it is lower than that originally proposed through Evidence Report	
	However, it would appear that the increase from the MATHLR to the IHLR is to be met by 100% affordable housing with an inference that there should be a limit on market housing delivery. There is no evidence provided to demonstrate that there is funding available for the delivery of that uplift without further market housing support.	Affordable housing also requires funding through market housing support.
	There is no evidence provided to show that any such affordable housing would make a contribution to all of the developer contributions imposed upon market housing developers leading to a detrimental impact on place making.	Affordable housing will pay the same as market tenure as per developer contribution policies.
	Furthermore, there should be no limit on total market housing numbers as market housing is the vehicle that enable affordable housing on the majority of sites that deliver affordable housing.	The Evidence Report outlines other delivery mechanisms that are available for affordable housing delivery.
	By the time of Proposed Plan consultation, HNDA 3 will be out of date and, if to be relied on, should be reviewed given change in circumstances.	HNDA3 is in date to 28 th July 2027. The Proposed Plan consultation is programmed for December 2026 – March 2027
	The list of references used must use the most up to date Housing Land Audit available at time of Local Development Plan Proposed Plan preparation. Housing Land Audit 2025 is referred to, but not listed as a Link to Evidence, in the Schedule.	HLA '25 to be added to the list of Evidence.

	<p>The Council must use the most up to date Housing Land Audit available to establish an accurate housing land requirement figure. This must be realistic and comply with the requirements and expectations of the Housing Land Audit Guidance and Template published by the Scottish Government in January 2025.</p>	<p>HLA '25 has been completed in compliance with the latest Scottish Government guidance on Housing Land Audits.</p>
	<p>Paragraph 3.99 of the Schedule states that there is an existing overall housing land supply at 2025 of 19,786 units. This is misleading. The deliverable element of that supply, i.e. the effective element, is only 12,862 units and that includes a significant number of “deliverable with constraints” sites.</p>	<p>The paragraph that this sentence is placed relates to infrastructure capacity. The sentence makes it clear that the 19,786 comes from all sources – deliverable, deliverable with constraints and undeliverable.</p>
	<p>It is considered that there has been no significant “clear out” of non-effective sites in the most up to date Audit. The “Removed” tab of the housing land audit is empty. Of the “Sites Deleted <2025” only one has been deleted due to a lapsed consent. The majority of deletions are due to site completion.</p> <p>From the Local Development Plan 2 Housing Workshop hosted by West Lothian Council in June 2024, the main problem faced by the Audit is the number of “effective” housing sites contained within it that are, clearly and without doubt, non-effective or, worse, have no prospect whatever of coming forward for residential development at all. This artificially inflates supply and gives a false impression of the reality of delivery.</p>	<p>The sites contained in the deliverable and non-deliverable tab for HLA'25 are there because they have been assessed accordingly. It is unclear which sites the responder is suggesting should be recategorised and the reasons for it.</p>

	<p>National Planning Framework 4 now directs allocations to be deliverable. It is considered that the Audit should include a supply that is, at least, 90% effective. To achieve that, it is imperative that the Council stands up to pressure to include sites within the Audit review process for inclusion's sake.</p> <p>Sites with no prospect of delivery (for a variety of reasons) should be excluded from the land supply calculation and, where required, deallocated. It would be simple to establish defensible criteria against which to test a site –</p> <ul style="list-style-type: none"> • Where a site has been in the Audit for two Development Plan cycles and there is no developer interest shown or there is no planning history for residential development on the site it should be removed. • Where there is a significant known constraint on the site preventing it coming forward for residential development (e.g. the eastern portion of East Broxburn) then it should be deallocated. 	<p>It is unclear where the 90% target for effective sites in the audit has been derived. The principles that define a sites inclusion in the housing land audit is set out in Scottish Government Guidance. The principles that allocations and deallocations will be assessed against in contained in the Site Methodology Assessment. No changes made.</p>
	<p>The advantages of allocating further land in Winchburgh are outlined.</p>	<p>These comments are noted, however they do not identify specific inaccuracies, omissions or deficiencies within the evidence schedule itself.</p>
	<p>Comments in relation to the viability implications of increasing affordable housing percentage is outlined.</p>	<p>These comments are noted, however they do not identify specific inaccuracies, omissions or deficiencies within the evidence schedule itself.</p>

RFA DEVELOPMENT PLANNING ON BEHALF OF MRS M CADZOW REGARDING LAND AT BURNSIDE BROXBURN	The relevance and importance of evidence links need to be clarified. Reference is not made to recent research from Homes for Scotland.	The responder has not specified what research is being referred to and provided a link to the said research for clarity. No changes made.
	Site Appraisal Methodology will be critical to the annual HLA and pipeline. Further clarity on this and its relationship to the National and Local Housing Crises is required	It is unclear what further clarification is required. No changes made.
	My client is not confident that the Schedule will facilitate an ambitious or effective plan led approach. Evidence presented in the Schedule is questioned and disputed on the following basis:	National strategy not being replicated at the West Lothian level is comments on a policy direction. It is unclear what national strategy is being referred to and how it should be replicated at West Lothian.
	- National strategy is not being replicated at the West Lothian level.	National strategy not being replicated at the West Lothian level is comments on a policy direction. It is unclear what national strategy is being referred to and how it should be replicated at West Lothian.
	- There is a lack of emphasis on accelerating the build out of potential housing sites in line with the Housing Emergency	Point 3 of the summary of the implications for the Proposed Plan reads3. Consider mechanisms to accelerate the build out of allocated housing sites.
	- Affordable housing targets are unlikely to be met under the current MATLHR/ LHRL	The council has set out that affordable housing targets are unlikely to be met under the current MATHLR, so applied an affordable housing uplift in reaching the iLHLR so the targets are met.
	- The iLHLR at 10825 homes is inadequate.	The reasoning behind the inadequate conclusion is unclear. No changes made.

	<ul style="list-style-type: none"> - We have reservations on how the HNDA 3, and Steady Growth Scenario has been interpreted and whether it is robust and credible 	HNDA3 was certified robust and credible by CHMA on 28 th July 2022.
	It is not clear that the affordable housing land gap will be addressed by the above approach and will result in shortfalls in both market and affordable housing supply. Flexibility requires to be reviewed.	The paper concludes there is sufficient land supply to meet market need and demand, but not land for affordable homes. An affordable housing uplift has been applied to the iLHLR. A 25% flexibility allowance has been applied to the base requirement. This is in line with the MATHLR methodology. No justification has been put forward to deviate from this approach.
	Delivery mechanisms appear to be poorly considered regarding their practical application. Further slippage in delivery is envisaged in the early plan period.	Comments are noted, however they do not identify specific inaccuracies, omissions or deficiencies within the evidence schedule itself.
	Part 8 of the Schedule requires further assessment and review as it is overly generalised in relation to transport, education, and health. The relationship with NPF4 Policy 18 Infrastructure First and the Site Appraisal Methodology is unclear.	Comments are noted, however they do not identify specific inaccuracies, omissions or deficiencies within the evidence schedule itself
	My client disagrees with the Summary and Conclusions Part 9 (specifically 1;3;5;7;8 and 9).	Comments are noted, however they do not identify specific inaccuracies, omissions or deficiencies within the evidence schedule itself
	We do not consider that a positive and ambitious approach has been taken to housing delivery or that the MATHLR or HLA provides a valid or robust baseline.	Noted. The reasoning behind the conclusion is unclear. No changes made.

<p>Scottish Water</p>	<p>Scottish Water agrees with the evidence and methodology set out in this Topic Schedule and considers that it provides a robust, transparent and evidence-led approach to establishing the Indicative Local Housing Land Requirement (iLHLR) for West Lothian.</p> <p>The proposed iLHLR of 10,825 homes (2028–2038) represents an appropriately ambitious, plan-led approach aligned with the requirements of:</p> <p>NPF4 Policy 16 (Quality Homes), and national guidance on exceeding the MATHLR.</p> <p>Scottish Water therefore has no objection to the evidence base or the proposed housing requirement.</p>	<p>Noted.</p>
<p>Ladywell Community Council</p>	<p>Housing delivery should be infrastructure-led and supported by clear evidence regarding healthcare, transport and community capacity. The evidence base would benefit from stronger consideration of cumulative infrastructure pressures and the importance of sustainable communities rather than focusing predominantly on housing numbers alone.</p>	<p>It is considered that the schedule assesses infrastructure capacity. Schedule 21 Infrastructure First and other relevant schedules cover the full range of infrastructure requirements</p>
	<p>Areas of concern:</p> <ul style="list-style-type: none"> • Housing pressure • Housing numbers alone is insufficient • Infrastructure-led development • Community sustainability 	<p>While this has been completed as a dispute, this relates to areas of concern rather than a disagreement with the evidence</p>

	<ul style="list-style-type: none"> • Green space provision • Avoiding commuter-only expansion <p>Overdevelopment concerns</p>	
Linlithgow and Linlithgow Bridge Community Council	<p>A major improvement is the clearer link between infrastructure and housing growth. RC criticised the earlier report for not explaining what housing growth would mean for transport, education and health. The updated ER responds by setting out an indicative local housing land requirement of 10,825 homes and assessing whether that growth can be supported by existing or committed infrastructure. It states that most supply is already identified, much of it has already been assessed, and only sites with available capacity or a credible route to delivery will be taken forward.</p> <p>The sites expected to contribute to the iLHLR are not anticipated to require strategic trunk road intervention beyond what was already assessed under LDP1. Where site-specific transport assessments are needed, these can be addressed through the normal development management process.</p>	Noted
Barratt Redrow, Miller Homes & Taylor Wimpey C/O LarnerMcGrath Ltd	<p>We were supportive to some extent of Option 2 in the previous Topic Paper consultation in February 2025. However, we felt that some further factors should have been considered, thus increasing the target.</p>	Noted.

	<p>The situation is now that West Lothian Council has approved an ILHLR of 12,500 homes in June 2025. This was rejected on a technicality by the DPEA in November 2025 relating to the count of overcrowded households. However, since that decision the Scottish Government has released new guidance on the Gate Check process (February 2026) which explains that Policy ambitions can be included, noting</p> <p><i>“It is recognised that such ambitions may be less directly quantifiable in terms of a precise number drawn from an established evidence source or primary data but may still support an ambitious approach.”</i></p>	Noted.
	<p>We don’t read the Reporter’s decision of November 2025 as a statement of principle that, in the midst of a Housing Emergency, the needs of families living in overcrowded housing ought to be expressly disregarded. Rather that they did not, at the time, consider that was consistent with the prevailing policy framework. That has now changed.</p>	Noted.
	<p>We object to the proposed ILHLR of 10,875 and would instead support returning to an ILHLR of 12,500 which the Council previously supported. We have provided a range of tried and tested methodologies and evidence which support the use of an ILHLR of at least 12,500. We consider that this would be more appropriate in facilitating the Council’s Local Housing Strategy (LHS) target of delivering 3,100 affordable homes over the period and address the Council’s longstanding concern</p>	Noted.

	<p>that the MATHLR is insufficient to deliver these affordable homes.</p>	
	<p>We understand the situation the Council finds itself in and are frustrated that the previous ILHLR of 12,500 was rejected in November only for new guidance to come out in February which in all likelihood would have rendered it acceptable. This has needlessly delayed the adoption of the plan and release of new sites for development.</p>	<p>Noted.</p>
	<p>However, we consider that the newly proposed ILHLR methodology is flawed:</p> <ul style="list-style-type: none"> • The methodology is unlike what has been used elsewhere and so is untested at Gate Check. • It is contrary to the NPF4 focus upon an all-tenure approach. • It relies on projections of affordable housing 12 years into the future and muddles up supply and demand in a manner which makes it unreliable. • It relies on unrealistic delivery assumptions for the affordable homes. 	<p>There is no nationally agreed ILHLR methodology, or guidance that the iLHLR needs to take an all-tenure approach.</p> <p>Scottish Government advice (February 2026) explicitly sets out that policy ambitions, including those set out in Local Housing Strategies, Strategic Housing Investment Plans, and local housing emergency action plans, can support an iLHLR above the MATHLR. The advice acknowledges that such ambitions <i>"may be less directly quantifiable in terms of a precise number drawn from an established evidence source or primary data but may still support an ambitious approach."</i> This provides a clear policy basis for the Council to draw on its affordable housing emergency declaration and affordable housing delivery programme as drivers for an iLHLR above the MATHLR.</p>

	<p>The proposed approach of comparing future affordable housing supply to affordable need and adding the shortfall of supply to the MATHLR is a new approach to calculating an ILHLR which has not previously been tested at Gate Check. We consider that such an approach is inconsistent with the LDP Guidance and other Guidance.</p>	<p>There is no nationally agreed ILHLR methodology, or guidance and a range of approaches have been agreed at gate check in setting an ILHLR. The MATHLR and the establishing an ILHR are two separate processes. The council's approach to setting its ILHLR is consistent with the advice published in February 2026, which sets out a step by step approach which considers evidence available to the council to set an iLHLR above the MATHLR.</p>
	<p>The proposed approach to setting the ILHLR is based upon a snapshot of land supply in 2025 and makes predictions on the delivery of the land supply up until 2038. It relies upon these assumptions to calculate the uplift of 950 dwellings. On average actual completions have been significantly lower than forecast with delivery being 72% of what was programmed.</p> <p>The current programming, on which the ILHLR is based, will inevitably change over time and is likely (based on the date in Table 1) to be an overestimate of actual delivery. It is for this reason that the ILHLR should be independent of assumptions on the delivery of the current land supply.</p>	<p>The available land supply for affordable homes is set out both in the agree Housing Land Audit 2025, and in the council's approved Strategic Housing Investment Plan (SHIP) which both identify land for 2167 homes. This evidence, alongside the affordable housing declaration is considered to be sufficient to justify the affordable housing uplift in the iLHLR calculation.</p>
	<p>As far as we are aware no other local authority has put forward an ILHLR which subsumes within it, assumptions about the delivery of the land supply. The clear problem with this approach is that need/demand and supply are separate concepts. Need/demand</p>	<p>Comments noted. The schedule has been amended to clarify the difference between the need for affordable homes in West Lothian (as set out in the Affordable Housing Emergency Declaration, the targets in the HNDA and the Local Housing Strategy</p>

	<p>should dictate the supply response. An ILHLR which would change with each new housing land audit, as this one would, blurs the concepts. Keeping them as separate variables will make the plan making process much more straightforward.</p>	<p>of 310 homes a year (3100 total) and the land supply available to deliver these homes.</p> <p>The schedule has been amended to move the options for delivery to a distinct section to sign post the options to deliver the undersupply of affordable housing land through the proposed plan.</p>
	<p>The 950 dwelling uplift proposed to the MATHLR relies on two unrealistic assumptions: that 100% affordable housing delivery on sites will be possible and that no flexibility is required to account for slippage in the programming.</p>	<p>The schedule has been amended to move the options for delivery to a distinct section to sign post the options to deliver the undersupply of affordable housing land through the proposed plan.</p>
	<p>The assumption that there would be no slippage and that no flexibility is required is not realistic as Table 1 demonstrates. Flexibility is essential as delays occur with planning, sites can turn out to have problems post planning or be unviable.</p>	<p>A 25% flexibility allowance has been added to the baseline requirement.</p>
	<p>The assumption that 100% affordable delivery would be possible is unrealistic. 23 affordable homes for every 100 all tenure homes over the last 15 years on average¹ have been built in the West Lothian Council area. If anything, this ratio has reduced over time. The analysis of the HLA included in the Topic paper shows a ratio of around 22 affordable homes for every 100 in the current housing land supply over the 2028-38 period.</p>	<p>The schedule has been amended to move the options for delivery to a distinct section to sign post the options to deliver the undersupply of affordable housing land through the proposed plan.</p>

	<p>There has been a general policy drive from central and local government to focus on delivering affordable housing for over a decade. We understand the Council has been working hard to deliver as many affordable homes as possible for some time. No credible evidence has been presented to suggest that such a radical change in delivery is achievable</p>	<p>Noted. The schedule has been amended to move the options for delivery to a distinct section to sign post the options to deliver the undersupply of affordable housing land through the proposed plan.</p>
	<p>The Topic Paper effectively claims that only land for 950 affordable homes would be required. 100% affordable housing is not commercially viable. The Topic Paper seems to imply it would look for public sector land. However, that does raise important questions over the fairness of the process. If the Council were to devise a strategy which systematically favours the allocation of its own land despite such sites potentially being worse sites from a planning perspective, this would raise questions about the proper administration of the planning system. The Council's planning and estates sections should be separate. It would also fail to align with the clear all-tenure focus in NPF4.</p>	<p>Noted. The council has a programme of delivering 100% affordable sites through the Strategic Housing Investment Programme (SHIP) subject to Scottish Government funding.</p> <p>The council's priority is to ensure the delivery of quality homes for a range of needs, not to favour its own land or instill unfairness against market house builders.</p> <p>The approach set out in NPF4 is for an all tenure MATHLR. This is not the same for the iLHLR which can consider local evidence.</p>
	<p>Even if the Council could identify deliverable sites on public sector land to bring forward the 950 affordable homes, any disposal would be subject to a Best Value assessment. It's not clear that foregoing a receipt for the sale of the land would pass any assessment at the time. Furthermore, if the Council were instead to seek to deliver the 950 affordable homes in partnership</p>	<p>The option of delivering affordable homes through partnerships is set out in the schedule.</p>

	<p>with the private sector it would have a more robust and flexible land supply and support and create a lot more jobs. There is infrastructure capacity for such an approach and it would be tried and tested and evidenced.</p>	
	<p>Delivering 950 affordable homes with enabling private sector homes at ratios similar to those above would support around 1,400 jobs per annum² over the plan period compared with just 333 if only the affordable homes were delivered. Furthermore, the private homes would bring positive benefits in their own right. Most people still aspire to owning their own home and new houses would improve choice and competition in the market. New housing also stimulates activity in the second hand market (as most moves are local) freeing up existing, cheaper properties and giving families greater options to find a property which suits their requirements.</p>	<p>Noted.</p>
	<p>It is clear that the HNDA 3 estimates referred to have significantly underestimated market demand. The HNDA 3, using the Council's preferred scenario estimated that between 2021 and 2025 (five whole years), market demand would be 454 homes per annum. In fact, according to Scottish Government statistics, private completions have averaged 935 dwellings per annum in the calendar years 2021-2025, over double what the HNDA predicted and close to all tenure MATHLR. We therefore don't consider that the market demand is adequately catered for by the</p>	<p>The Council's Housing Land Audit records lower levels of private housing completions than those reported in the Scottish Government statistics. As a result, the extent to which recent private sector completions have exceeded HNDA market demand estimates is less pronounced than suggested by the respondent.</p>

	<p>MATHLR as the Topic Paper states. However, we do consider that market housing could help facilitate the Council's 310 affordable housing target as well as supporting jobs and competition in the market.</p>	
	<p>The description of the existing land supply between paras. 3.21 and 3.28 is vague and would benefit from a table showing how the deliverable supply has been derived from the 2025 HLA (given it only covers up to 2035) and how the other adjustments referred to have been made. We would not also that the latest HLA does include Homes for Scotland disputes</p>	<p>Comments noted. The schedule has been amended from the draft to be clear that the council's land supply issue is an affordable one. All of the land available in the HLA25 will be reassessed as part of the preparation of the proposed plan.</p>
	<p><i>Open Market Acquisition Scheme (OMAS)</i></p> <p>The Council notes that this would be an option for primary delivery of the new affordable housing required. However, unlike new build affordable housing buying up existing market homes does not create net new homes. The HNDA, MATHLR etc show need and demand for net new homes by subtracting the amount, of households at the start of the period from the amount at the end, plus extra for existing need, not gross need or gross demand. Gross figures would be much higher.</p>	<p>The use of OMAS moves homes from private ownership to council ownership, changing the tenure of the homes.</p>
	<p><i>Increasing Affordable Requirement</i></p> <p>21. No evidence has been put forward to justify that this would be achievable. We would seek to understand what the parameters of the Council's instructions to the District Valuer are. City of Edinburgh Council did this to inform City Plan 2030 but</p>	<p>The DV report is available to view as document WLC 027 DVS Valuation Report: Affordable Housing Viability and Commuted Sum Exercise. Paragraph 2.2 outlines the purpose of the report.</p>

	used a series of unrealistic site assumptions and even then, the heavily redacted report did not appear to give clear support for the 35% threshold they chose.	
	<p><i>100% Affordable Allocation</i></p> <p>As set out above we do not consider that this is a plausible or desirable strategy.</p>	Noted, comments above on delivery mechanisms.
	<p><i>Programming slippage from pre-plan period delivery</i></p> <p>This strategy would make the setting of the ILHLR even more complex and ultimately circular. It amounts to hoping that the programming assumptions which inform the currently proposed ILHLR are wrong so that the slippage (between 2025-28) can be counted as part of the deliverable supply from 2028 onwards. Obviously, if programming over the next three years slips, programming over the next 13 years will also slip, so this is not actually a net gain in supply. This approach would be like accountant preparing accounts by only counting the income and ignoring the expenditure. The Council should simply set an ILHLR which is independent of programming assumptions and work out the gap between the ILHLR and the deliverable land supply based upon the most up-to-date HLA available at the time of the Proposed LDP preparation</p>	Comments noted. The reference to programme slippage has been removed as an option for delivery in the final schedule. Availability of land will be assessed at the point of the preparation of the proposed plan.
	<i>Densities</i>	Noted. Availability of land will be assessed at the point of the preparation of the proposed plan.

	<p>This is one-sided accounting again. Other sites may be deliver less than allocated for. If sites obtain planning permission for more than they've been allocated for, then that will be reflected in future HLAs.</p>	
	<p><i>Stalled Sites</i></p> <p>25. Again, this approach risks being one sided. The land supply changes from year to year. Some sites currently deemed effective become constrained stalled while others which have been constrained find a solution. It is unreasonable to assume that this will only be one way traffic from constrained to deliverable.</p>	<p>Availability of land will be assessed at the point of the preparation of the proposed plan.</p>
	<p><i>Brownfield Sites</i></p> <p>26. The planning system has favoured brownfield development for decades. There will therefore be clear limits to what is achievable over and above existing allocations</p>	<p>Noted.</p>
	<p><i>Windfall</i></p> <p>27. NPF4 is much less favourable for windfall development, so delivery in the future is likely to be much lower. We do not consider it would be appropriate to include a windfall allowance</p>	<p>However, windfall still contributes to the overall supply of land on an annual basis. It is not included in the pipeline until consent is granted.</p>
	<p><i>Range of Outlets</i></p> <p>28. We strongly agree with the points being made on having a variety of outlets and agree in principle that increasing the ILHLR above the MATHLR supports this</p>	<p>Noted.</p>

	<p>objective. However, if the Council were to rely largely upon the existing land supply then there would be a serious shortage of active sites by the end of the LDP period.</p>	
	<p>Even though it is likely that completions will be less than programming, particularly in years 3-5, the Council would be left with very little deliverable land by the second half of the plan period. This would give it very little flexibility to respond to stronger demand than anticipated or stronger need for affordable housing than expected. The Council would also be in a weak position to bid for SHIP funding in the latter part of the plan period as it would have very few shovel ready sites. This could lead to it missing out on funding to local authorities with a more robust longer term pipeline of deliverable sites</p>	<p>The council approves its SHIP in order to bid for funding for sites. The sites are prioritised within the SHIP. One of the aims of adding additional affordable land is to ensure that there is a pipeline for delivery over the plan period.</p>
	<p>The respondent puts forward two calculations to achieve a iLHLR of 12,500.</p> <ol style="list-style-type: none"> 1) Local Housing Strategy approach 2) Updated unmet need evidence from the 2022 census. 	<p>Noted</p>
	<p>The Council has a longstanding concern that the MATHLR is insufficient to facilitate the delivery of its affordable housing aspirations. Setting a ILHLR which enables the delivery of the LHS is a legitimate</p>	<p>Noted.</p>

	<p>approach having regard to both the 2023 LDP Guidance and the February 2026 Advice.</p>	
	<p>The Council has delivered 23 affordable homes for every 100 all tenure completions over the last 15 years and expects to deliver around 22 for every 100 all tenure completions over the period 2028-38. While it may be possible to achieve a marginal increase in this ratio, we don't consider that it is plausible to pivot to a 1:1 (or close ratio). It is not as if maximising affordable housing delivery hasn't been a core focus of the Council for many years. Therefore, something in the region of 20-25 per 100 is likely to be a robust assumption. Using these ratios gives a target of 1,350 and 1,410 per annum. Although there would be a case for adding generosity to this. Adding together private completions in recent years to the 310 affordable target gives a target of around 1,250 per annum as a benchmark against recent delivery</p>	<p>The LHS aims to deliver 3100 new affordable homes over the plan period. The council has focused on delivering homes for social rent as this is the core function of the council. The council is also investigating the potential to deliver further BMR / MMR properties in partnership with affordable housing providers, OPAS and purchasing homes directly from housebuilders.</p>
	<p>Alternatively using a mixture of the 2022-household projections, homelessness data and NRS information on concealed and overcrowded households with double counting sipped out gives a target of 1,250 per annum. This substitutes a broader definition of unmet need, which is methodologically robust and in line with robust and credible adjustments made in other HNDAs into the MATHLR methodology. It closely tracks the policy aspirations set out in the previous iteration of the ILHLR and so is a legitimate policy adjustment</p>	<p>Scottish Government Evidence Reports and Gatechecks Action Plan and Advice, February 2026 cautions 'Care should be taken, however, not to undermine established methodologies, for instance on overcrowding, and authorities should be as clear as possible as to the sources and robustness of the approach'.</p>

	<p>having regard to February 2026 guidance which uses 2022 census data and addresses previous concerns.</p>	
	<p>The Council has already approved a target of 1,250 per annum. We consider that the previous approach would now likely be considered acceptable due to the revised guidance of February 2026. However, the above two methods could also be used to support a figure of 1,250 per annum or 12,500 over the 10 year period. This approach would be a more realistic strategy to realise the Council's longstanding ambitions to deliver over 300 affordable homes per annum.</p>	<p>The Gate Check Reporter raised concerns regarding the robustness of applying national overcrowding percentages directly to local circumstances.</p> <p>The Reporter concluded that:</p> <ul style="list-style-type: none"> • the application of a simple national percentage to West Lothian was not sufficiently robust or credible; and • reliance on such an approach would depart from established methodology without a sufficiently robust evidence base. <p>Scottish Government Evidence Report guidance (February 2026) similarly advises that care should be taken not to undermine established methodologies, particularly in relation to overcrowding.</p> <p>When the Council carries out a new HNDA, it can consider any new methodology.</p> <p>The response does not put forward a specific calculation that is transparent and understandable. Neither does the response include a clear source or a robust approach that meets the expectations of Scottish Ministers that can be incorporated into the Evidence Report.</p>

Schedule 10 – Affordable Housing and Specialised Housing

Respondent	Comments	Response
HFS	Agree the topic paper is sufficient	Noted.
	<p>Affordable Housing</p> <p>HFS welcomes the Council’s inclusion of Homes for Scotland Briefing Paper: Barriers to Housing</p> <p>Delivery in the list of evidence under WLC 042.</p> <p>The draft Schedule references the Housing Need and Demand Assessment (HNDA) and posits a need figure for West Lothian. The HFS-commissioned report, Existing Housing Need in West Lothian, is included in the evidence list under WLC 044 but requires to be fully considered in assessing levels of need. A more comprehensive analysis of these matters is included within our response to the draft LHLR Schedule.</p> <p>It is noted that the Council is seeking to ensure that sufficient housing land supply will be available for 310 affordable homes per year – our comments on this are contained within our response to the draft LHLR Schedule.</p>	The remaining comments are noted.

Specialist and accessible housing

On page 9 the Council recognises that that there is:

“a fundamental gap in understanding private sector accessible and wheelchair housing with no robust data being available.”

Despite this the Council states that they will consider the LHS proposal of 10% of all new build homes to be wheelchair accessible. No policy can be justified where the evidence base explicitly concedes it is inadequate and is not representative of the current situation. HFS recommends that a comprehensive survey is carried out to obtain a quality, representative evidence base.

It would also be worth understanding what current building warrants and regulations are in terms of delivering accessible housing, for example HFS is aware that Building Regulation requirements ensure that all homes have level access for wheelchairs or are adaptable for the needs of changing populations through, for example, downstairs toilets that can be converted to shower rooms or stairs that can accommodate stairlifts. Additionally, whilst homebuilders can build adaptable homes there is no guarantee that they will be purchased by households with specific accessibility requirements.

	<p>Given the ongoing national and local Housing Emergencies, the Council must ensure that affordable and specialist housing requirements are not increased to a level which would hamper the viability of otherwise deliverable sites. If the overall sites are rendered inviable, there will be fewer accessible homes delivered across the Council area.</p> <p>Care Homes</p> <p>It is important to note that care homes do not contribute to total housing numbers under the revised <i>Class Use Order</i> as they fall under Class 8 Residential Institutions rather than Class 9 Houses.</p> <p>Nevertheless, HFS welcomes the Council's commitment to credit care home proposals in the call for ideas stage. It is positive that the Council recognises the importance of addressing the shortfall of provision of care homes, especially in light of the demographic change that the NRS projection population change data shows, where more of the population will be made up of pensioners and those who need high levels of care. A suitable provision of care homes should free up housing elsewhere.</p>	
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Ladywell Community Council	<p>The evidence base should place greater emphasis on the delivery of genuinely affordable and accessible housing, including accommodation suitable for older residents, disabled residents and young families. Housing mix and quality of place should be considered alongside overall housing delivery targets.</p>	<p>The Evidence Report contains a Housing Needs and Demands Assessment and the West Lothian Local Housing Strategy. The respondent does not identify any specific deficiencies in the evidence base, dispute the findings presented within the schedule, or provide additional evidence sources that should be considered.</p>
	<p>Areas of concern:</p> <ul style="list-style-type: none"> • Genuinely affordable homes • Housing mix for older residents and young families • Quality of place • Accessible housing needs 	<p>While this has been completed as a dispute, this relates to areas of concern rather than a disagreement with the evidence</p>
	<p>Comments from our community include asking what research is carried out before development takes place, does our area really need 4,5,6 bedroom houses or do we need more 1,2 & 3 bedroom homes? What consideration is given to accessibility when planning? Has the level of income in the areas been considered when private developers are granted permission? It seems that it is not and it is yet another aspect that is outwith the reach of people of Ladywell.</p>	<p>Noted.</p>

Winchburgh Developments Ltd	<p>It would appear that the increase from the MATHLR to the IHLR is to be met by 100% affordable housing with an inference that there should be a limit on market housing delivery. There is no evidence provided to demonstrate that there is funding available for the delivery of that uplift without further market housing support. There is no evidence provided to show that any such affordable housing would make a contribution to all of the developer contributions imposed upon market housing developers leading to a detrimental impact on place making. Furthermore, there should be no limit on total market housing numbers as market housing is the vehicle that enable affordable housing on the majority of sites that deliver affordable housing.</p>	<p>No evidence of funding.</p> <p>Affordable housing also requires funding through market housing support. Affordable housing will pay the same as market tenure as per developer contribution polices.</p> <p>The council has no insight into future Scottish Government Affordable Housing budgets to enable such an analysis to be possible.</p>
	<p>On the matter of affordable housing delivery and percentage requirements, there is a balance to be met between the ability to deliver taking account of commercial considerations, land availability, funding and infrastructure capacity / extension / provision) and the need for such housing. The Council should take a realistic approach to identifying as wide a range of affordable housing tenures as possible and increases the effective housing land supply through the Local Development Plan review, then it will see a proportional increase in delivery of affordable housing units. Simply increasing the affordable housing</p>	<p>Comment relates to policy development rather identify specific inaccuracies, omissions or deficiencies within the evidence schedule itself.</p>

	percentage on a deliberately constrained additional housing land supply only puts pressure on site viability. The Council should encourage innovative funding delivery of affordable housing as well to make up for / plug any gaps or shortfalls in Scottish Government funding	
	The Council must use the most up to date Housing Land Audit as a baseline document – that will, be Housing Land Audit 2025 by the time the Proposed Plan is published. Housing Land Audit 2025 will help to establish an accurate housing land requirement figure. This must be realistic and comply with the requirements and expectations of the Housing Land Audit Guidance and Template published by the Scottish Government in January 2025.	HLA '25 is listed as evidence and has been completed in compliance with the latest Scottish Government guidance on Housing Land Audits.
	By the time of Proposed Plan consultation, HNDA 3 will be out of date and, if to be relied on, should be reviewed given change in circumstances.	HNDA3 is in date to 28 th July 2027. The Proposed Plan consultation is programmed for December 2026 – March 2027
	The National Context notes a real time reduction in Scottish Government funding for affordable housing. The Council requires to calculate if there is Scottish Government funding availability to deliver the 310 units per annum that it identifies as being needed	The council has no insight into future Scottish Government Affordable Housing budgets to enable such a calculation to be possible.

	<p>without adversely affecting development viability in general.</p>	
	<p>On the matter of affordable housing delivery and percentage requirements, there is a balance to be met between the ability to deliver taking account of land availability, funding and infrastructure capacity / extension / provision) and the need for such housing. The Council should take a realistic approach to identifying as wide a range of affordable housing tenures as possible and increases the effective housing land supply through the Local Development Plan review, then it will see a proportional increase in delivery of affordable housing units. The Council needs to formally confirm, within the Local Development Plan review itself, the range and choice of types of affordable housing that it considers appropriate to meet housing need.</p>	<p>Noted, comments relate to policy development and LDP2 spatial strategy rather than specific inaccuracies, omissions or deficiencies within the evidence schedule itself.</p>
	<p>Simply increasing the affordable housing percentage on a deliberately constrained additional housing land supply only puts pressure on site viability. The Council should encourage innovative funding delivery of affordable housing as well to make up for / plug any gaps or shortfalls in Scottish Government funding.</p>	<p>Noted, comments relate to policy development and LDP2 spatial strategy rather than specific inaccuracies, omissions or deficiencies within the evidence schedule itself.</p>

West Lothian Climate Action Network (WLCAN)	<p>The revised Version 2 schedule provides a significantly more detailed and evidence-based assessment of affordable and specialised housing needs across West Lothian.</p>	Noted.
	<p>While the overall direction of the schedule is welcomed, several important issues require further strengthening</p>	<p>The majority of the issues raised under Questions 4 and 5 relate to policy outcomes and priorities for the Proposed Plan. These comments are noted and will be considered during preparation of the Proposed Plan and associated strategies.</p> <p>The respondent does not identify any specific inaccuracies within the evidence base nor identify any significant additional evidence requirements.</p> <p>No changes made.</p>
Scottish Water	<p>Scottish Water agrees with the evidence presented within this Topic Schedule and considers that it provides a robust and comprehensive assessment of affordable and specialised housing needs within West Lothian.</p> <p>The schedule appropriately reflects:</p>	Noted.

	<p>the requirements of the Town and Country Planning (Scotland) Act 1997, and</p> <p>NPF4 Policy 16 (Quality Homes),</p> <p>particularly in relation to affordable housing delivery, demographic change, and the need to provide housing that meets a wide range of needs.</p> <p>Scottish Water therefore has no objection to the evidence base.</p>	
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Schedule 11 – Brownfield

Respondent	Comments	Response
Ecology&Biodiversity -WLC	https://www.nature.scot/sites/default/files/2025-06/naturescot-commissioned-report-606.pdf	Additional reference added.
	Slight concern over the sites where it is listed as “bing”. These are part of the cultural heritage of West Lothian and may be known landmarks, or important for geo/biodiversity. Perhaps addition of wording around the cultural aspect of the bing areas to be considered at planning stages etc.	Bing is referenced as addresses as part of the vacant and derelict land survey. These are factual address names. Topic schedule 14 deals with tourism and culture. No changes made
	<p>Section 1.2: Phrasing used infers that brownfield sites are not worthy of/ requiring environmental impact assessment/ protections. Suggested amendment:</p> <ul style="list-style-type: none"> - Recording both brownfield and greenfield sites is essential for sustainable land-use planning and management. Brownfield sites, often rich in biodiversity due to their varied habitats, provide opportunities for thoughtful redevelopment and ecological enhancement. Greenfield sites, as undeveloped land, require careful consideration to balance development needs with the protection of natural habitats. Documenting both types of sites enables the Council and developers to make informed decisions, supporting responsible 	Text added.

	development and the preservation of valuable ecosystems across the landscape.	
Ladywell Community Council	<p>Brownfield and previously developed land should be prioritised wherever possible before additional greenfield expansion is considered. The evidence base should more clearly reflect the role of brownfield regeneration in supporting sustainable growth while protecting existing green infrastructure.</p> <p>We will fully support the prioritisation of brownfield before greenfield and to reuse vacant/disused sites before green spaces.</p>	It is considered the brownfield topic schedule alongside the Site Appraisal Methodology topic paper prioritises the redevelopment of brownfield land before greenfield land wherever possible. No changes made.
RFA Development Planning on behalf of Land at Craigrigg Brickworks Westfield and Whiteside Steading Bathgate	In the light of generic additional information, a holding objection is submitted pending more site-specific information and site appraisal.	Noted. No changes made.
	Both Craigrigg Brickworks and Whiteside Steading provide viable and sustainable opportunities for housing re-development subject to site appraisal.	The Call for Ideas process deals with site specific proposals. No changes made.
	In relation to Policy ENV2 and ENV3 Proposals should make the best use of resources, integrate with services and facilities, and demonstrate the highest standards in design and environmental quality to	Noted. Policy ENV2 and ENV3 are existing LDP policies. No changes made

	protect and enhance the established landscape character.	
	In terms of the Councils SPG development would secure the removal of inappropriate buildings; and improve visual and environmental amenity of the countryside. Re-development would have a positive effect on the effect upon the countryside.	Noted. No changes made.
	The evidence does not sufficiently explain how the Council would seek to deliver vacant and derelict land opportunities in accordance with NPF4 Policy 9.	No alternative text proposed. Site Appraisal Methodology / Spatial Strategy / Call for ideas / existing NPF4 policies provide a framework to bring forward proposals for the redevelopment of vacant and derelict land opportunities. No changes made.
	The Council has not always followed its own policy or guidance in relation to planning applications often resulting in counterproductive outcomes.	Noted. No changes made.
	The former Westfield Paper Mill is incapable of being effectively delivered due to legal and viability constraints.	The site will be considered as part of the Site Appraisal Methodology. No changes made.
	My clients would agree that the LDP review should set out opportunities for the sustainable reuse of brownfield land including vacant and derelict land and empty buildings. We await further advice in relation to biodiversity, brownfield, and landscape findings in relation to sites on the LVDL Register as well as the Open Mosaic Guidance.	Noted. No changes made.

Scottish Water	<p>We agree with the evidence presented within this Topic Schedule and supports the strong emphasis on the reuse of brownfield, vacant and derelict land, in line with NPF4 Policy 9.</p> <p>The approach is supported in principle as:</p> <p>redevelopment of brownfield land can reduce pressure on greenfield sites, and</p> <p>can support sustainable, compact growth within existing settlements.</p> <p>Scottish Water therefore has no objection to the evidence base.</p>	Noted.
The Coal Authority (trading as the Mining Remediation Authority)	We are pleased to see reference made to unstable land in 1.3 Contamination. We do however consider that this could be made clearer by amending the heading of 1.3 to 'Contamination and Unstable Land'.	Heading changed from contamination to contamination and unstable land.
Woodland Trust	1.3- '...an exception to development in the countryside where a proposal provides for the restoration of a brownfield site where there is no realistic prospect of it being returned to agriculture or woodland use ...' is	1.3 relates to existing LDP policy. This is factual and should not be confused with future policy suggestions.

	<p>it only for agricultural or woodland use? What about other important habitats such as species-rich grassland or wetlands that could also be essential contributors of existing or future nature networks?</p> <p>2.17 'Derelict and vacant land can have an adverse impact of people's health and wellbeing,...' please outline relevant examples.</p>	<p>2.17 The Evidence Report should be proportionate and it is not considered necessary to outline examples of the adverse impact of vacant and derelict land on people's health and wellbeing. Further no examples have been put forward.</p>
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Schedule 12 – Rural Homes

Respondent	Comments	Response
Scottish Water	<p>Scottish Water agrees with the evidence presented within this Topic Schedule and considers that it provides a proportionate and evidence-based assessment of rural housing across West Lothian.</p> <p>Scottish Water therefore has no objection to the evidence base or overall policy direction.</p>	Noted.
HFS	Agree Evidence Base is sufficient	Noted.
	<p>It is important to recognise that whilst new development in rural areas may not be of a scale to deliver improvements to local facilities, services and infrastructure but it can help sustain existing services where changes in demographics mean that they are underutilised. New homes can make a positive contribution to local living.</p> <p>A stated aim of NPF4 is to encourage rural development. Care must be taken in seeking to constrain any form of residential development, given the ongoing national Housing Emergency, but also not to over allocate housing allocations in rural areas at the expense of the main settlements in West Lothian where existing infrastructure can be utilised. Traditionally, the</p>	<p>Noted.</p> <p>The respondent does not identify any specific inaccuracies within the evidence base nor identify any significant additional evidence requirements.</p> <p>No changes made.</p>

	<p>SME sector are more likely to develop in the more rural areas of West Lothian however, recent HFS research titled Scotland's SME Home Builders 2024 and Scotland's SME Home Builders 2025 (link previously provide) highlights the decline in homes delivered nationally and locally by SMEs. Whilst sufficient sites require to be allocated in rural areas to sustain local populations and services there is a risk that overallocation at the expense of allocations in main settlements will reduce the Council's ability to meet the future LHLR and Spatial Strategy, especially given declining numbers of SME home builders to implement these sites.</p>	
<p>West Lothian Climate Action Network (WLCAN)</p>	<p>The revised Version 2 schedule provides a clearer and more evidence-based assessment of rural housing issues within West Lothian and appropriately recognises the distinction between areas experiencing rural population decline elsewhere in Scotland and the development pressures affecting West Lothian's accessible rural areas.</p>	<p>Noted.</p>
	<p>While the overall direction of the schedule is welcomed, we consider several areas could be strengthened further.</p>	<p>The Evidence Report requires to take a proportionate approach. The respondent does not identify any specific inaccuracies within the evidence base nor identify any significant or specific additional evidence requirements. No changes made.</p>

	We support the review and proposed removal of the Lowland Crofting Policy where it is no longer consistent with climate objectives, sustainable travel principles and contemporary planning policy.	Noted.
RFA Development Planning on behalf of Whiteside Farm, Bathgate; Craigrigg, Westfield and Longridge EH47 8AG.	General criticism of existing LDP1 policies.	The comments relate to the merits and operation of existing planning policy and will be considered through preparation of the Proposed Plan. They do not identify a deficiency in the evidence presented within the Topic Schedule. No changes made.
	Outlines Proposals at Whiteside farm and Craigrigg	The merits of specific proposals will be dealt with under the call for ideas process. No changes made.
	We have reservations about the revocation of the Council's Lowland Crofting policy and consider that this may still have a purpose in stimulating development. This requires to be justified.	The topic schedule considers compatibility between the Lowland Croft Policy and NPF4. Evidence WLC 105 West Lothian 'Lowland Crofting' and farm diversification research project is considered sufficient to justify the removal of the policy. No changes made.
	Historically there has been a lack of effective and attractive self-build serviced plot opportunities that can contribute to the housing land requirement and rural development.	The respondent has not supplied any evidence to back up that assertion, except for quoting the number of notes of interest on the Council's self-build housing register (15) which is a modest amount.

Schedule 15 – Play, Recreation and Sport

Respondent	Comments	Response
WLC Ecology and Biodiversity Team	Suggested wording	Suggested wording incorporated.
Ladywell Community Council	<p>Parks, play areas and recreational spaces form an important part of community wellbeing and social infrastructure. The evidence base should give greater consideration to maintenance standards, accessibility, provision for young people and the long-term quality of recreational spaces across Livingston neighbourhoods.</p>	<p>The respondent does not identify any specific deficiencies in the evidence base, dispute the findings presented within the schedule, or provide additional evidence sources that should be considered.</p> <p>The matters raised are recognised as important considerations for the Council's ongoing work on the Open Space Strategy and Play Sufficiency Assessment. The comments are therefore considered to relate primarily to future policy development and service provision rather than the sufficiency of the evidence presented within the Evidence Report schedule.</p> <p>No additional evidence requirements have been identified through this representation.</p>
	<p>Areas of concern:</p> <ul style="list-style-type: none"> • Maintenance of parks/playparks • Youth facilities (lack thereof) • Informal gathering spaces • Anti-social behaviour hotspots 	<p>While this has been completed as a dispute, this relates to areas of concern rather than a disagreement with the evidence</p>

	<ul style="list-style-type: none"> • Recreation space quality 	
	In Ladywell we have issues with eScooters and eBikes, these are recorded and reported but we often hear the cry that this happens as there is nothing else for them to do.	Noted.
Michael Philpott	<p>I sent in an application under the Request for New Ideas regarding the 're-designation of use' of my land in Loganlea to revert to that prior to LDP1 owing to an error caused by the previous Consultants. Whilst now being fed with loads of information I cannot establish where this has been addressed – if at all.</p> <p>I assume that it may be part of 1.17 Updated of Audit Open Spaces. It seems then that 1.18- Engagement with Internal and External Stake Holders - is not being followed as I've heard nothing. I want to ensure that my interests are not being overlooked.</p>	Comment does not relate to the sufficiency of the evidence report and is being dealt with as part of the 'Call for ideas' process.
Winchburgh Development Ltd	In the absence of an up-to-date Open Space Strategy, highlighted as an issue by the Scottish Government in its response to the first Evidence Report, Winchburgh Developments Limited is unable to make any substantive comments. However, it is noted that the ongoing strategic expansion of Winchburgh is providing a full range of open space	The respondent notes that the absence of an up-to-date Open Space Strategy limited their ability to comment substantively on the sufficiency of the evidence. This matter is being addressed through the preparation of the updated Open Space Strategy, which will inform the Proposed Plan.

	<p>including a new District Park, Town Park and neighbourhood parks as well as a wide range of leisure uses. Further to that , the new marina on the Union Canal is open and a programme of water sports activities is being provided by Winchburgh Community Development Trust. A range of sports uses are also available as part of the new learning campus at Block L of the masterplan to the west of the village. This will serve the expanded settlement and any future development as proposed by the Winchburgh 2035 Vision document submitted as part of the Local Development Plan review process.</p>	<p>The representation also highlights a range of open space, recreation and sporting facilities delivered as part of the ongoing expansion of Winchburgh. These comments are noted. However, the respondent does not identify any specific inaccuracies, omissions or deficiencies within the evidence schedule itself. Relevant information on open space and recreation provision will be considered through the Open Space Strategy and associated evidence base.</p>
<p>Scottish Water</p>	<p>Scottish Water agrees with the evidence presented within this Topic Schedule and supports the emphasis on:</p> <p>play sufficiency,</p> <p>open space provision, and</p> <p>sport and recreation infrastructure, in line with statutory requirements and NPF4 Policy 21.</p> <p>Scottish Water also supports the role of:</p> <p>open space in health and wellbeing, and its contribution to blue and green infrastructure networks.</p> <p>Scottish Water therefore has no objection to the evidence base.</p>	<p>Noted.</p>

SportsScotland	Yes – comments raised by sportscotland in our previous response have been reflected within the updated evidence report document. We note the council’s continued commitment to understanding the community need and addressing the supply and demand of places for sport. sportscotland also welcome the council’s intention to create an ‘Open Space Strategy workplan’, and are happy to provide further guidance and collaboration.	Noted.
West Lothian Climate Action Network (WLCAN)	The revised Version 2 schedule provides a significantly broader & more integrated evidence base relating to play, recreation, sport and open space provision across West Lothian.	Noted.
	While the overall direction of the schedule is welcomed, several important issues require further strengthening.	<p>The majority of the issues raised under Questions 4 and 5 relate to policy outcomes and priorities for the Proposed Plan. These comments are noted and will be considered during preparation of the Proposed Plan and associated strategies.</p> <p>The respondent does not identify any specific inaccuracies within the evidence base nor identify any significant additional evidence requirements.</p>

		No changes made.
Woodland Trust	<p>What is the scheduled timeline for the completion of the West Lothian Forestry and Woodlands Strategy?</p> <p>The design and delivery of food growing spaces within development areas may be achievable by the developers. However, how will these areas be managed appropriately and sustainably over the long-term? A comprehensive plan for the responsibility of their upkeep and managing the public use of these areas would be required as part of the planning process. These responsibilities are beyond the standard 'factor' agreements. Is there an expectation that the Council will adopt these spaces? In any case, how will there appropriate funding allocated for these areas to ensure appropriate maintenance?</p>	<p>The timescale of the Forestry and Woodland Strategy is to inform the Proposed Plan.</p> <p>The remaining comments relate to queries related to future policy and council funding. The respondent does not identify any specific inaccuracies, omissions or deficiencies within the evidence schedule itself.</p> <p>No changes made.</p>

	<ul style="list-style-type: none"> • whole-life carbon impacts associated with employment land and infrastructure; • emissions arising from commuting and freight transport patterns; • climate resilience of employment areas; • circular economy principles; and • energy efficiency and renewable energy integration within industrial and commercial development. <p>The Proposed Plan should ensure that future employment growth supports climate mitigation and adaptation objectives and does not reinforce unsustainable car dependent development patterns.</p> <p>Oversupply of employment land and spatial strategy implications</p> <p>WLCAN note the schedule identifies a substantial oversupply of employment land, including sites that have remained undeveloped for extended periods despite longstanding allocation. The respondent welcomes the acknowledgement that some employment land may be reassessed through the Site Appraisal Methodology.</p>	<p>Comments noted and support for the revision welcomed.</p> <p>The Council shares the view that employment growth must be achieved with due regard to climate change and the climate emergency. This is explicitly referenced and accounted for in the Scottish Government’s National Strategy for Economic Transformation (WLC 458) and it is not therefore considered necessary for any textual change to be made to the Schedule.</p> <p>The goals and outcomes of the Proposed Plan are noted and will be taken account of at the</p>
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	<p>However:</p> <ul style="list-style-type: none"> • stronger emphasis should be placed on brownfield-first regeneration principles; • compact urban development and mixed-use regeneration opportunities should be prioritised; and • long-term vacant employment land should be assessed in relation to biodiversity, climate resilience, local living and housing needs. <p>Where employment land is no longer realistically marketable, opportunities should be explored for:</p> <ul style="list-style-type: none"> • community uses; • green infrastructure; • affordable housing; • urban greening;biodiversity enhancement; and • local food growing. <p>Sustainable transport and accessibility</p> <p>The schedule would benefit from stronger emphasis on:</p>	<p>appropriate time when the Proposed Plan is being drafted.</p> <p>The concept of ‘brownfield first’ regeneration is one which permeates national planning policy and the council shares the respondents’ support for. However, as the reuse of brownfield land is already referenced at paras 2.4 no addition to the Schedule is considered necessary.</p> <p>The view that compact urban development and mixed-use regeneration opportunities should be prioritised is similarly noted but is more of a policy consideration than a matter for the evidence base and an addition to the Schedule is therefore considered inappropriate.</p> <p>The Council has already, and pro-actively reviewed employment land designations in LDP1 and has been mindful of the factors identified by the respondent when reaching a decision on whether to allocate these sites in the new LDP.</p> <p>The suggested alternative and potential uses of non-viable employment land are noted and represent a not unreasonable list of options but their appropriateness would be dependent on site specific circumstances. This is in any event primarily a policy consideration and can be more appropriately addressed at the Proposed Plan stage. No revision to the Schedule is therefore proposed.</p>
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	<ul style="list-style-type: none"> • reducing car dependency associated with employment growth; • locating employment opportunities within accessible locations; • integration with active travel and public transport infrastructure; and • supporting local employment opportunities within Local Living frameworks. <p>Future business and industrial development should prioritise:</p> <ul style="list-style-type: none"> • sustainable transport accessibility; • proximity to existing settlements; and • lower-carbon travel patterns. <p>Community Wealth Building implementation</p> <p>While the schedule strongly references Community Wealth Building principles, greater clarity is needed regarding how these principles will influence:</p> <ul style="list-style-type: none"> • land allocation decisions; 	<p>The four objectives which have been identified are consistent with national planning policy and the council does not disagree with the suggested ‘priorities’ which business and industrial development should adhere to. However, these are more of a policy consideration than a matter for the evidence base and an addition to the Schedule is not considered appropriate or necessary.</p> <p>Noted and will be considered as part of the preparation of the proposed plan.</p> <p>Noted. That section of the Schedule which references community wealth building, Part 3, has also been expanded in response to another representation see paras 3.3 to 3.4</p>
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	<ul style="list-style-type: none"> • procurement and development outcomes; • use of public land and assets; and • long-term ownership and stewardship models. <p>We support stronger emphasis on:</p> <ul style="list-style-type: none"> • community-led development; • cooperative and social enterprise models; • community asset transfer opportunities; and • retention of wealth within local communities. <p>Rural development and countryside protection</p> <p>WLCAN welcomes support for rural economic diversification and sustainable Rural development. However, stronger safeguards are required to ensure that rural economic development:</p> <ul style="list-style-type: none"> • protects landscape character, biodiversity and productive agricultural land; • avoids dispersed and car-dependent development patterns; 	<p>Noted</p> <p>Noted. The safeguards which have been suggested are not unreasonable and are consistent with national planning policy and the Schedule has been augmented at para 4.4 to reflect this.</p>
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	<ul style="list-style-type: none"> • aligns with countryside belt / green belt objectives; and • prioritises reuse of existing buildings and brownfield land before new-build countryside development. <p>The schedule should place greater emphasis on balancing rural economic development with climate obligations, sustainable transport and environmental protection.</p> <ul style="list-style-type: none"> - WLCAN strongly supports an economic strategy that aligns employment growth with climate action, social justice and sustainable placemaking. <p>WLCAN recommend that future evidence gathering and policy development should also consider:</p> <ul style="list-style-type: none"> • whole-life carbon assessment of employment land and economic growth scenarios; • freight transport emissions and logistics impacts; 	<p>Noted.</p> <p>Suggestions for policy development are noted and will be taken account of at the more appropriate juncture which is when the Proposed Plan is being drafted.</p>
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	<ul style="list-style-type: none">• affordable housing and community infrastructure planning; and• countryside belt / green belt objectives relating to sustainable settlement patterns. <p>- WLCAN welcomes the inclusion of Community Wealth Building as a central component of the schedule and support stronger recognition that planning policy can help reduce inequality, support resilient local economies and improve long-term community wellbeing.</p> <p>- Finally, WLCAN believe the Proposed Plan presents an important opportunity to support a genuinely sustainable and inclusive economy that:</p> <ul style="list-style-type: none">• creates local employment opportunities;• reduces poverty and inequality;• supports climate resilience and biodiversity recovery; and• strengthens community ownership, participation and local economic resilience.	
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<p>Key Agency – Scottish Enterprise</p> <p><i>Peter Noad</i></p>	<ul style="list-style-type: none"> - Requested explicit reference made to Scotland’s National Strategy for Economic Transformation 2022. 	<p>Noted. This has been Included as part of the ‘Links to Evidence ‘and referenced at para 2.1</p>
<p>Key Agency – HES</p> <p><i>Ginny Sharp</i></p>	<ul style="list-style-type: none"> - HES had no comment to make on the Schedule. 	<p>Satisfaction with the evidence base noted.</p>
<p>Key Agency - Scottish Water</p> <p><i>Dave Bissett</i></p>	<ul style="list-style-type: none"> - Scottish Water had no objection to the evidence base or overall policy direction. - Scottish Water agrees with the evidence presented within this Topic Schedule and supports the overall approach to: <ul style="list-style-type: none"> • supporting a diverse and resilient local economy, • ensuring an adequate supply of employment land, and • aligning with Community Wealth Building (CWB) priorities and regional strategies, in line with • NPF4 Policies 25, 26 and 29. 	<p>Satisfaction with the evidence base noted.</p>

	<ul style="list-style-type: none"> - Scottish Water also supports: <ul style="list-style-type: none"> • the emphasis on regeneration and reuse of land; and • aligning economic development with wider sustainability and net zero objectives. 	
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<p>Homes for Scotland</p> <p><i>Finn Watkins</i></p>	<p>HfS agreed that the evidence set out in the schedule was sufficient but nevertheless had comments to make.</p> <ul style="list-style-type: none"> - It is suggested that the following additional evidence is also considered by the Council: <ul style="list-style-type: none"> • Homes for Scotland (HFS) Existing Housing Need in West Lothian 2024 (undertaken by Retties and the Diffley Partnership) • The Economic Footprint of Housebuilding in England and Wales July 2018 (Lichfield's for Home Building Federation) 	<p>The publication 'Homes for Scotland (HFS) Existing Housing Need in West Lothian 2024' is already referenced as document WLC 044 in Topic Schedule 09 'Indicative Housing Land Requirement' and therefore does not require to be replicated.</p> <p>'The Economic Footprint of Housebuilding in England and Wales' and 'The Social and Economic</p>
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	<ul style="list-style-type: none"> • The Social and Economic Benefits of Homebuilding in Scotland (Lichfield's for Homes for Scotland) • Community Wealth Building (Scotland) Bill (Scottish Parliament Website) <p>- As we move to a plan-led system there is a need to ensure that sufficient land is allocated for rural housing.</p>	<p>Benefits of Homebuilding in Scotland' provide pertinent information and have been included as evidence documents WLC 618 and WLC 045) and are referenced at para 3.4.</p> <p>With regard to the Community Wealth Building (Scotland) Bill, it is noted that this has since received Royal Assent and was brought into force on 25 March 2026. For the sake clarity, the Community Wealth Building (Scotland) Act 2026 has been referenced instead (document WLC 617)</p> <p>'Moving to a plan-led system' in the context of allocating land for rural housing infers that this is something new, but Scotland has of course operated a plan-led planning system for decades.</p> <p>By law, all planning decisions must be made in accordance with the area's statutory development plan, unless significant material considerations indicate otherwise. While the nature of development plans has certainly evolved over time, a consistent framework has nevertheless endured and provides certainty, ensuring that long-term public interest dictates where development should—and should not—occur.</p>
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	<ul style="list-style-type: none"> - In the context of addressing the local and national housing emergencies, Homes for Scotland (HFS) would be happy to share details of a future call for sites with members, including SME builders, to support the delivery of rural homes. HFS members are likely to oversee the delivery of smaller rural developments. - In considering Community Wealth Building approaches, it is important to consider that each home builder is structured differently. Some will have direct labour and there could be little opportunity for direct local 	<p>The Council recognises that the delivery of rural homes, where deemed to be appropriate and consistent with National Planning Policy Framework (NPF4), may be more readily executed by local building companies and the Council welcomes the readiness of Homes for Scotland and its SME members to participate in any such projects that may arise in West Lothian.</p> <p>House building is recognised as a cornerstone of Community Wealth Building, and in addition to just providing shelter, it can be used as a powerful economic lever to generate, circulate, and retain wealth within local areas.</p> <p>Local companies can help to keep wealth circulating within the community by employing local workers and sourcing materials from nearby suppliers.</p> <p>Localised expenditure also creates a powerful multiplier effect, ensuring every pound spent supports local families and independent businesses rather than leaving the area.</p> <p>Local builders are also likely to be more responsive to specific local housing needs (such as sensitive renovations or small-scale infill developments) and can bring nuance and innovation to their products</p>
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	<p>employment opportunities whilst others will utilise sub-contractors. The latter will rely on sub-contractors, such as plumbers, joiners etc. tendering for work or being approached directly by the home builder.</p> <p>Residential developments, even in the short-term, will generate indirect local employment through use of local services, such as retail provision. It must also be recognised that some companies will have tried and tested procurement arrangements and suppliers, especially if they are part of a larger company. Where this is not the case developers may go out to tender or approach local companies directly. It is, however, important to understand that local businesses may not have sufficient resources and/or output to meet the requirements of major housing developments, and the delivery of new homes should not be unduly delayed at a time of a national and local Housing Emergency through delays in the local supply chain.</p>	<p>which is not always possible for national housebuilders to achieve at scale.</p> <p>The council appreciates that there is however no 'one size fits all' for the procurement of housing in rural areas and that there will inevitably be variations in how it is organised and managed and that a pragmatic approach will be taken</p> <p>A series of textual revisions have been made at paras 3.1 to 3.4 and at para 4.6 to reflect the above.</p>
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Schedule 21 – Infrastructure First

Respondent	Comments	Response
<p>Walk Wheel Cycle Trust (formerly Sustrans)</p> <p><i>Mel Newbould</i></p>	<ul style="list-style-type: none"> - Recognises that Sustainable Transport is a key consideration for the <i>Infrastructure First</i> approach to development - Affirms WWCT support for site allocations which support the delivery of planned strategic transport infrastructure, especially those contributing to active travel infrastructure and supporting multi-modal journeys via active travel and public transport. - Keen to ensure that the full Network Development Plan, rather than just the current National Cycle Network, is captured in LDP2 to ensure opportunities are maximised to work together to fix and grow the network. Suggests that this could be included as an Arc GIS layer and would be happy to work with the Council to embed the NDP into settlement statements, design briefs and masterplans etc. - Suggests the inclusion of cycle routes in policies and also proposes examples of policy wording. 	<p>Comments noted, amendments made to the Sustainable Transport schedule in response. Other comments relate to policy and will be considered as part of the preparation of the proposed plan.</p>

	<ul style="list-style-type: none"> - suggests the use of planning gain to improve cycle infrastructure. 	
<p>Ladywell Community Council</p> <p><i>Caroline Nicol</i></p>	<ul style="list-style-type: none"> - The Infrastructure First schedule provides a clear, high-level strategic overview of West Lothian's capacity, yet fails to provide necessary localised detail for established communities like Ladywell. While useful for broad planning, the evidence overlooks specific service gaps, active travel connectivity, and infrastructure needs within smaller neighbourhoods. Further localised analysis is recommended to ensure established areas are not underserved in favour of larger growth projects. - Feedback on local evidence indicates that some data fails to accurately reflect the experience of Ladywell residents, particularly regarding transport, 20-minute neighbourhood assessments, and infrastructure capacity. Specific concerns include declining bus reliability, limited local services, and the need for investment in green corridors, highlighting a disconnect between reported metrics and reality. For more details, refer to the original feedback document. - There is a risk of overstating the extent to which Ladywell currently functions as a 20-minute neighbourhood. 	<p>Comments noted and will be considered as part of the Local Living Assessment being carried out.</p>

	<ul style="list-style-type: none"> - The respondents suggest five targeted improvements to enhance infrastructure planning for the Ladywell community in Livingston: <ul style="list-style-type: none"> • Neighbourhood level transport and Active Travel Audits • Service accessibility mapping • Workforce capacity in healthcare • Condition surveys of Green Network • Clearer linkage between infrastructure evidence and future housing allocations 	
<p>Winchburgh Developments Limited (WDL) <i>Robin Matthew (PPCA)</i></p>	<ul style="list-style-type: none"> - Winchburgh Developments Limited welcomes the recognition given to Winchburgh within the Schedule. - Winchburgh Developments Limited agrees with the evidence set out in the Schedule subject to the following comments. - The strategic expansion of Winchburgh successfully demonstrates the Council's "Infrastructure First" Policy by integrating public amenities with residential growth. - Regarding healthcare, and whilst noting that the Almond Practice is red under current RAG 	<ul style="list-style-type: none"> - Comments noted. Healthcare comments will be taken account of in the Healthcare Schedule.

	<p>scoring, Winchburgh Developments Limited is actively working with partners to establish new healthcare facilities in Winchburgh to meet local planning requirements (circa 4,000 and 5,800 additional homes and should not be considered a blockage to future Local Development Plan land allocations.</p>	
<p>Key Agency - Scottish Water <i>Dave Bissett</i></p>	<p>- Scottish Water has no objection to the evidence base or proposed approach</p>	<p>- Noted.</p>
<p>Joint Forum of Community Councils in West Lothian</p>	<ul style="list-style-type: none"> • The respondents only partially agree the evidence is sufficient. • The Joint Forum strongly backs the core principle (NPF4, Policy 18) and insists houses must not be built before supporting roads, schools, GP surgeries and public transport are in place. Capacity should dictate development locations, moving away from reactive, developer-led planning. A broader definition of infrastructure that includes blue and green assets (parks, rivers, natural flood barriers). The need to assess operational capacity and actual service delivery/staffing, not just physical buildings. <p>Other comments</p> <ul style="list-style-type: none"> • <i>Staffing vs. empty buildings</i> – No data on workforce pressures. Developers often build a shell school or medical centre with no 	<ul style="list-style-type: none"> - Noted - Noted - Agreed, the Council must work with NHS Lothian on staffing of healthcare centres. - Cumulative impact will be considered as part of infrastructure appraisals for the proposed LDP2. - Comments on greenfield sprawl noted. The use of infrastructure capacity is a key art of the infrastructure policy, however, the location of new developments needs to be considered in the wider context of local living, reuse of land and sustainable development. - Comments on developer contributions noted. - Comments on maintenance noted.

	<p>funds or staff to run it; the Council must work with NHS Lothian and education providers to guarantee facilities can be staffed before approving major housing.</p> <ul style="list-style-type: none">• <i>Cumulative impacts</i> – Site-by-site capacity assessment is a major flaw; five or six smaller developments can overwhelm a school or drainage network even if one won't. Evaluations should account for combined and cross-boundary impacts.• <i>Greenfield sprawl</i> – Strong objection to using local infrastructure capacity to justify greenfield development or settlement expansion. Spare capacity isn't a justification to build; Infrastructure First should support urban regeneration and prioritise vacant, derelict and urban land. Opposes Infrastructure First being used to create car-dependent, isolated commuter estates; infrastructure should build healthier, lower-carbon, resilient communities in line with NPF4.• <i>Holding developers to account</i> – LDP2 should establish legally watertight safeguards for developer contributions, ending the practice of promising community infrastructure to secure permission then later removing it by claiming unviability.	
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	<ul style="list-style-type: none"> The plan should show how the Council will fund long-term upkeep of expanded roads, paths and spaces, so sprawling developments don't burden taxpayers. 	
<p>Barratt Redrow, Miller Homes and Taylor Wimpey <i>Joe Larner</i></p>	<ul style="list-style-type: none"> The respondents consider the Council's assumption that the ILHLR is fixed at this stage is premature and introduces severe procedural risk. By failing to model alternative delivery scenarios, the Council creates a rigid framework that cannot adapt to evolving evidence, ultimately threatening the Local Development Plan (LDP) preparation timescale. Allocating new homes in locations with spare capacity will help to maintain efficient operation ensuring that the existing infrastructure is used effectively and is sustainable in the long run. It will also allow the Council to realise the job creation benefits of new homes and fiscal benefits through an increased Council Tax base. Response included additional comments on the council having spare capacity in infrastructure for additional development 	<p>The ILHLR at the Evidence Report stage is indicative and is based on the assessed need for new housing in West Lothian. The delivery of the iLHLR will be considered through the preparation of the proposed plan.</p> <p>Other comments in relation to the deliverability of the ILHLR / locations for new housing allocation are considered with the ILHLR Schedule and will be considered as part of the preparation of the proposed plan.</p>

	and that development can deliver new infrastructure.	
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<p>Linlithgow and Linlithgow Bridge Community Council</p> <p><i>Dr John Kelly</i></p>	<p>The community council welcome the significant improvements made to establish a more robust, "infrastructure-first" framework that effectively links housing growth to delivery capacity, particularly regarding updated school roll forecasts and developer obligations. The overall position is materially more robust than the one previously criticised by the reporters.</p> <p>Other comments</p> <ul style="list-style-type: none"> • The West Lothian-wide assessment risks masking distinct local pressures, characteristics and service gaps within individual settlements. • The Council is urged to structure the LDP in two parts: a strategic policy/governance framework, then community plans for the nine ward areas using the Local Living work programme. • Supports the 2026 workflow to map local living service gaps and align development sites to close them through September 2026. 	<p>Comments noted. Additional comments are not in relation to the evidence base and will be considered as part of the preparation of the proposed plan.</p>
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	<ul style="list-style-type: none"> • Despite no strategic trunk road interventions being needed beyond M9 Junction 3, significant local road upgrades are still required to support housing that would arrest population decline. In line with appeal decision PPA-400-2093, cumulative traffic and air quality impacts must be resolved strategically at the plan stage, not deferred to individual developer applications. 	
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<p>West Lothian Climate Action Network <i>Rosslyn Barr</i></p>	<ul style="list-style-type: none"> - The revised Version 2 schedule offers a more comprehensive, transparent evidence base on infrastructure planning, capacity and developer contributions across West Lothian. <p>Other comments</p> <ul style="list-style-type: none"> - Use infrastructure-first principles to support compact urban development, brownfield regeneration and sustainable settlement patterns — not continued greenfield expansion. - Greater recognition of climate and biodiversity implications, especially where investment enables car-dependent development. 	<p>Comments noted. Additional comments are not in relation to the evidence base and will be considered as part of the preparation of the proposed plan.</p>
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	<ul style="list-style-type: none">- More emphasis on reducing infrastructure demand through local living, retrofit, reuse and efficient use of existing urban land.- Clearer assessment of cumulative impacts across multiple allocations and neighbouring authorities.- Stronger coordination between the Council, NHS Lothian and education providers to ensure facilities have both physical infrastructure *and* staffing before major developments are approved. Planning should address the long-term ability to recruit, retain and fund staff, not just buildings and floorspace. Greater transparency on how assessments account for workforce pressures, service constraints and cumulative impacts.- Stronger safeguards so developer contributions are sufficient, enforceable and delivered on time.- More emphasis on nature-based solutions, climate adaptation and ecosystem resilience as core infrastructure.- Further consideration of long-term operational and maintenance costs, especially where dispersed development increases public burdens.	
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	<ul style="list-style-type: none">- Identified existing/committed capacity should not justify large-scale greenfield expansion where brownfield, regeneration and compact growth options remain. Infrastructure-first should be an opportunity to shape lower-carbon, healthier, more resilient settlements, not just to accommodate development.	
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Schedule 22 – Sustainable Transport

Respondent	Comments	Response
<p>David Sutherland</p>	<ul style="list-style-type: none"> - It is suggested that any additional allocation of land for housing in Winchburgh should be deferred until sustainable transport provision is in place and that too much reliance is being placed on the proposed railway station. 	<p>Comment noted, development at Winchburgh is being managed through the development management process, any additional development will be considered through the proposed plan.</p>
<p>Key Agency – Transport Scotland <i>Deborah Livingstone</i></p>	<ul style="list-style-type: none"> - Notes that there is no reference to a West Lothian LTS in the Schedule - Notes that a revised car km reduction policy is published this within the Climate Change Plan update 2026 and should be referenced within the Schedule. - Notes that the ESES STPR2 case for change document which has been referenced is becoming out of date and recommends this data is supplemented or checked by more recent traffic count data from Transport Scotland. Additionally, notes that there is no information provided explaining why M8 Junction 3 is a particular congestion hotspot. - While noting that speed data is provided for a location on the M8 there is no comparative date for the M9. 	<p>The schedule has been updated to include all the missing evidence identified by Transport Scotland.</p>

	<ul style="list-style-type: none"> - Notes omission of information on road safety relating to the trunk road network and no information provided on trunk road condition but suggests that data is available from Transport Scotland to remedy this. - Identifies a text error which mistakenly affords trunk road status to some roads. - Recommends further detail to be provided on important strategic infrastructure projects including Winchburgh station and the M9 junction 3 slips in order to further understanding on their deliverability and implications for the Proposed Plan. - Indicates a willingness to work constructively with the Council to address the matters highlighted and with a view to providing a positive endorsement for Gatecheck submission. 	
<p>Walk Wheel Cycle Trust (formerly Sustrans)</p> <p><i>Mel Newbould</i></p>	<ol style="list-style-type: none"> 1. National Cycle Network, there are 3 routes and detailing their location and length. 2. Notes that National Planning Framework (NPF4) identifies the National Cycling, Walking & Wheeling Network as a national development and should be appropriately referenced in LDP2. 3. Keen to ensure that the full Network Development Plan, rather than just the 	<ol style="list-style-type: none"> 1. Reference added to Link Route 76 2. Reference added 3. Data noted, added to GIS database 4. Noted and agreed. 5. Noted and added.

	<p>current National Cycle Network, is captured in LDP2 to ensure opportunities are maximised to work together to fix and grow the network. Suggests that this could be included as an Arc GIS layer</p> <p>4. Suggests that the WWCT strategy supports many of the themes in LDP2 and incorporates many of the plans for Active Travel improvements within the West Lothian area and across the SESTran region, and that there is an opportunity to synthesis the approach.</p> <p>5. Requests that the WWCT's strategy and Network Development Plan are referenced in the <i>Links to Evidence</i> section in the Schedule.</p>	
<p>Ladywell Community Council <i>Caroline Nicol</i></p>	<ul style="list-style-type: none"> • The evidence base should place greater emphasis on the importance of the long-term maintenance, safety and accessibility of Livingston's active travel network in order to sustain its use. • The respondent argues that the infrastructure now needs upgrading and maintenance and identifies the following areas of concern: <ul style="list-style-type: none"> • underpass safety • lighting/CCTV 	<p>Comments noted. Safety of cycle routes is considered as part of the West Lothian Active Travel Plan, and through their design.</p>

	<ul style="list-style-type: none"> • accessibility for disabled users • maintenance standards (in particular the paths) • bus reliability • safe school cycling routes <ul style="list-style-type: none"> - There is concern that the Ladywell area is neglected with regard to maintenance and repair of active travel related infrastructure - General concerns are expressed about the traffic and environmental impact of current and future development. 	
<p>Network Rail <i>Catherine Stewart</i></p>	<ul style="list-style-type: none"> - Network Rail agrees that the evidence set out in the schedule is sufficient subject to the following comments. - Requests the removal of reference to Edinburgh Waverley Western Approaches project: at para 2.3 as there is no update on this and it is out of date. - The respondent suggests two pieces of additional evidence should be referenced: A "Railway for Everyone" is Scotland's Railway strategy designed to remove barriers and enhance accessibility across its network, 	<ul style="list-style-type: none"> - Noted - Reference removed - Reference added - Noted

	<p>supporting both sustainable travel and climate goals. The initiative utilizes four pillars—reaching the station, moving around, accessing platforms, and finding space—guided by data to prioritize improvements. The Strategy is available at A-Railway-for-Everyone Accessibility-Strategy.pdf.</p> <ul style="list-style-type: none"> - The Climate Action Plan for Scotland’s Railway (2024–2029) outlines a partnership between Network Rail Scotland and ScotRail to address climate change through emissions mitigation and adaptation. The strategy aims to enhance local biodiversity and deliver social benefits for Scotland over the next five years. 	
<p>Winchburgh Developments Limited (WDL) <i>Robin Matthew (PPCA)</i></p>	<ul style="list-style-type: none"> • Winchburgh Developments Limited agrees with the evidence set out in the Schedule subject to the following comments. • There are several references to provision of a Winchburgh Rail Station with an associated mobility hub and this is welcomed. It is noted that this now has planning permission and is progressing through the funding application process. This is regarded as the key sustainable transport intervention for the eastern part of West Lothian. • The respondents welcome the support given to Winchburgh within the Regional Spatial Strategy for the development of the settlement. The rail station and motorway 	<p>Comments noted, these comments are in respect of a specific development, not the Transport Evidence base.</p>

	<p>junction increases the accessibility of the settlement.</p> <ul style="list-style-type: none"> • As a result of new development, the expanding Winchburgh is also now served by a sub-regional bus service linking the settlement to locations elsewhere within West Lothian, Edinburgh and beyond delivered in partnership between Winchburgh Developments Limited, West Lothian Council and public transport providers. • The mix of new local development, including parks and open space provision, has greatly increased the scope for active travel and local living. As an example of that, Winchburgh now has a very successful weekly “bike bus” in place to allow local school pupils to ride to school. • Future growth of Winchburgh beyond the current planning permission in principle as identified within the Winchburgh 2035 Vision document will extend active travel and local living opportunities further in line with national and Council policy on the subject. 	
<p>Key Agency - Scottish Water <i>Dave Bissett</i></p>	<ul style="list-style-type: none"> • Scottish Water has no objection to the evidence base or overall policy direction. 	<p>Comments noted</p>

	<ul style="list-style-type: none"> • Scottish Water agrees with the evidence presented within this Topic Schedule and supports the overall direction to: promote sustainable transport modes, reduce reliance on private car use, and align development with the sustainable travel hierarchy and wider climate and placemaking objectives, in line with NPF4 Policies 13 and 18. 	
<p>SPOKES <i>Dave du Feu</i></p>	<ul style="list-style-type: none"> - Undelivered items – Several transport commitments haven't been delivered; explanations are sought. - Climate targets (1.3) – The text should state <i>why</i> the target was missed (the necessary steps weren't taken), not just that it was "out of reach." Strong demand management is essential to cutting car use, yet it isn't mentioned. Government-commissioned (AECOM) research showed even the "20% by 2030" cut was achievable with demand management — important evidence that should be cited. - Active Travel (2.1–2.10) – Past provision favoured recreational routes (e.g. disused rail lines). More emphasis is needed on <i>utility</i> routes that are direct, level and segregated along main 	<ul style="list-style-type: none"> - Updates on site specific projects are provided in the council's Delivery Programme. All current transport projects are being reviewed as part of the preparation of the proposed plan. - Noted, this section has changed to reflect the new Climate Change Plan. - Comments on Active Travel noted. The council plans cycling infrastructure in its Active Travel Plan which will inform the proposed plan. - The routes are defined by the Council's approved Active Travel Plan. The section being referred to sets out the infrastructure available, as required by the Evidence Report rather than the policy behind it. - Noted

	<p>roads, citing Edinburgh's shift to a segregated "Primary Cycle Network."</p> <ul style="list-style-type: none"> - Suggestions– In the three bullets of para 2.9, add a sentence describing the infrastructure type for each tier (Primary = segregated on main roads; Secondary = mix of segregated/quiet roads/offroad; final = quiet residential, traffic-reduced areas). Begin Active Travel with the Council's overall philosophy (paras 2.4 onwards); move the largely recreational paras 2.2–2.3 to the end. - Bus network (2.16) – Falkirk–Linlithgow–Edinburgh is listed as a primary route (2.13), so its appearance as a secondary route is unclear. - St John's Hospital – A Linlithgow connection to the hospital is essential and should be added to the Linlithgow–Livingston entry (mirroring the Fauldhouse–Livingston entry). - Road Travel (2.39–2.57) – Only "carrots" (better public transport, Local Living) are proposed; these won't reduce car use without demand management. Should reference the AECOM research and SEStran 2035 RTS commitment on road-user charging, and the Council should publicly commit to working with SEStran and Edinburgh on such measures. - Parking Strategy (2.64/2.65) – Say more about the harms of pavement and kerbside parking, 	<ul style="list-style-type: none"> - Comment on St John's noted, and will be considered / assessed as part of the transport requirements for the LDP2 strategy - The council approach to reducing the impact of road travel on West Lothian is set out in Part 3, a place-based approach to reducing road dominance. - Noted, this will be considered within the Parking Strategy which will inform the proposed plan. - Comment noted. Reference to Scotland's Railway "Railway for Everyone" added. - Noted.
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	<p>using Linlithgow town centre as an example of a hostile pedestrian/cycling environment.</p> <ul style="list-style-type: none"> - Station car parking (2.66) – Where demand exceeds supply, apply charges so spaces go to those most in need (Linlithgow example). Seek ScotRail evidence on affected stations and work with them to introduce charging. Station access – Reference Scotland's Railway "Railway for Everyone" materials on improving walking/cycling access to stations. - Place-based approach (3.1–3.4) – Strong support, especially the Development Planning Guidance in 3.4, but it should run <i>in parallel</i> with the demand management policies noted above, not as a substitute. 	
<p>SportScotland <i>Craig Zirmer</i></p>	<p>SportScotland has no objection to the evidence base. SportScotland is satisfied that comments raised in their previous response have been reflected within the updated evidence report document. The respondents note the council's continued commitment to understanding the community need and addressing the supply and demand of places for sport. SportScotland also welcome the council's intention to create an 'Open Space Strategy workplan' and are happy to provide further guidance and collaboration.</p>	<p>Noted</p>

<p>Joint Forum of Community Councils in West Lothian</p>	<p>The respondents partially agree that the evidence is sufficient. The Joint Forum is pleased to see that Version 2 of this schedule is much more thorough and strongly supports the Council's acknowledgment that the reliance on private cars must be reduced and public transport improved to meet climate targets. Other comments include:</p> <ul style="list-style-type: none"> - EVs aren't enough – The schedule leans too heavily on the switch to electric vehicles. EVs are positive but don't ease congestion, fix damaged roads, or help those who can't afford the higher cost. - Prioritise public transport – LDP2 should focus more on protecting and improving bus and train connectivity, as ongoing cuts to local bus services are isolating villages. The evidence base must address how the Council will deliver this. - Proper active travel, not just paint – The respondents want a commitment to physically segregated cycle infrastructure, rejecting painted lines on busy roads as ineffective and unsafe. Many existing paths are poorly lit, disconnected, or unmapped; to be a real choice, routes must be high-quality, physically safe, and fully linked to town centres. - Stop car-dependent sprawl – Despite West Lothian's geography making public transport 	<p>Noted.</p> <p>Other comments are policy related and will be considered during the preparation of the proposed plan.</p>
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	<p>hard to provide, development keeps being permitted on greenfield land in hard-to-reach places, undermining local living principles.</p> <ul style="list-style-type: none">- Brownfield-first – The Council is urged to use LDP2 to enforce a strict brownfield-first approach, building on vacant or underused land within existing town centres to reduce commuting.- Recommended planning policies:<ul style="list-style-type: none">• <i>Rural transport</i> – better evidence and support for community-led and on-demand bus services for isolated villages.• <i>Safe routes to schools and services</i> – all paths connecting homes to schools, shops and GP surgeries fully separated from busy main roads.• <i>Tougher developer obligations</i> – require housing developers to fully fund and deliver high-quality public transport and walking networks before residents move in.- Equality - Transport is fundamentally about equality and isolation; if people can't move around West Lothian easily, safely and affordably without a car, the planning system is failing them.	
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<p>West Lothian Climate Action Network <i>Rosslyn Barr</i></p>	<p>The revised Version 2 schedule provides a significantly expanded and more evidence-rich assessment of sustainable transport infrastructure across West Lothian. We particularly welcome the strong alignment with National Planning Framework 4, National Transport Strategy 2 and wider climate policy objectives.</p> <ul style="list-style-type: none"> • Stronger emphasis on the sustainable travel and investment hierarchies. • Recognition that cutting car dependency and achieving modal shift are essential to climate targets. • Better integration of transport planning with local living and 20-minute neighbourhood principles. • Expanded evidence on active travel, public transport accessibility and regional connectivity. • Treating transport accessibility as key to siting future development. • Inclusion of data on transport inequalities, bus accessibility and commuting. • Commitment to transport appraisal work, and closer transport/land-use integration. 	<p>Noted.</p> <p>Other comments are policy related and will be considered during the preparation of the proposed plan.</p>

	<p>☐ Areas to strengthen:</p> <ul style="list-style-type: none">• Stronger policy direction to steer development to locations accessible by sustainable modes.• More emphasis on reducing the need to travel via compact development, brownfield-first principles and local living.• Clearer links between transport infrastructure and countryside/green belt objectives to prevent car-dependent sprawl.• Firmer commitments on delivery, funding and long-term maintenance of active travel infrastructure.• Greater recognition of the health, equality and social justice implications of transport inequality.• More focus on accessibility for disabled people, older people and those without a car.• Clearer acknowledgement that EV transition alone won't deliver the needed emissions cuts without significant modal shift. <p>Transport policy must be more explicitly tied to a spatial strategy prioritising compact urban growth, regeneration and brownfield redevelopment while protecting countryside and green belt from unsustainable, car-dependent expansion.</p>	
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Schedule 24 – Healthcare Infrastructure

Respondent	Comments	Response
<p>David Sutherland</p>	<ul style="list-style-type: none"> - While welcoming the ‘red’ status of health practices having been identified there is criticism that insufficient information has been provided as to how this will be addressed within the new LDP2. It is suggested that any additional allocation of land for housing in Winchburgh should be deferred until matching healthcare facilities are provided. 	<p>Noted. Summary of NHS Lothian practice methodology to be published. Future strategy for Almond practice to be identified.</p>
<p>Ladywell Community Council <i>Caroline Nicol</i></p>	<ul style="list-style-type: none"> - It is suggested that the evidence base should more fully assess the cumulative impact of housing growth on GP, dental and wider healthcare capacity within Livingston. - New allocations should be supported by clear evidence that healthcare infrastructure can expand in parallel with population growth. - The respondents believe that this has not been the case in the past and are sceptical that it will be any different for LDP2. - The respondents believe that the NHS is not failing, but it is overworked. - The evidence base should better assess whether healthcare provision is keeping pace with population growth as lived experience suggests 	<p>Noted. Cumulative impact already assessed by NHS Lothian in practice methodology</p> <p>Noted. RAG scoring reflects existing and future population growth.</p> <p>Noted. Past LDP contained provision for Healthcare Infrastructure but has been constrained by lack of evidence.</p> <p>Noted. However staffing of Primary Care is not a matter for Planning.</p> <p>Noted. However staffing of Primary Care is not a matter for Planning.</p>

	<p>that it is not, evidenced by being unable to obtain medical appointments and long waits for treatment.</p>	
<p>Winchburgh Developments Limited (WDL) <i>Robin Matthew (PPCA)</i></p>	<ul style="list-style-type: none"> - Winchburgh Developments Limited agrees that the evidence set out in the schedule is sufficient subject to the following comments. - The respondents welcome the exclusion of City of Edinburgh Council patient figures from the Almond Practice statistics. - Whilst noting that the Almond Practice is red under current RAG scoring, Winchburgh Developments Limited is actively working with partners to establish new healthcare facilities in Winchburgh to meet local planning requirements (circa 4,000 and 5,800 additional homes and should not be considered a blockage to future Local Development Plan land allocations. Two options to be examined are – <ul style="list-style-type: none"> • The separation of the 1,500sqm partnership building site into a 900sqm commercial leisure / community use building and a separate 600sqm healthcare building (footprint requirement as 	<p>Noted.</p> <p>Noted.</p> <p>Noted. This is a helpful approach.</p>

	<p>confirmed in discussions with the NHS).</p> <ul style="list-style-type: none"> • Subject to technical appraisal, expansion of the current Almond Practice GP surgery. This would deliver additional healthcare requirements at this location with commercial leisure / community use delivered as part of the currently identified partnership centre site. <p>- It is noted that under a 2012 agreement, landowners agreed to give land to West Lothian Council for a 1,500-sqm Winchburgh Partnership Centre to house community services. However, the Council has since stopped funding partnership centres, the police no longer need space there, and a new pharmacy has already opened nearby. Despite these changes, the owners are still legally required to pay over £692,250 in library contributions to fund a community library facility in Winchburgh.</p> <p>- The owners are proposing to split a designated "Town Centre Partnership Centre" site into two specific components:</p>	<p>Noted</p> <p>Noted.</p>
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	<ul style="list-style-type: none"> • Primary Healthcare Facility: A site of up to 600 square metres gross internal floor area. • Community Wellbeing Facility: A site of up to 900 square metres to host a library, café, health and fitness suite, and gym. <p>The owners explicitly commit to ongoing discussions with the local council and NHS Lothian to help fund/support the capital costs of building the healthcare facility.</p>	
<p>Key Agency - Scottish Water</p> <p><i>Dave Bissett</i></p>	<ul style="list-style-type: none"> - Scottish Water has no objection to the evidence base or overall policy direction. - Scottish Water agrees with the evidence presented within this Topic Schedule. 	<p>All comments are noted.</p>
<p>Key Agency - NHS Lothian</p>	<ul style="list-style-type: none"> - Agreement on the evidence base with comments for information. - The mention of 'Ghost Patients'. GP Practices cannot de register a patient unless notified that the patient is deceased, or the patient has re-registered elsewhere. West Lothian carries the load for patients where no such notification is received. - Table 1.3 could be misleading in respect to 'Total Rooms available (including community 	<p>Noted. Schedule to be updated to note any current capacity issues relate to active patients.</p>

	<p>services)'. Admin areas have been captured in the total figure, it may be more representative for the table to break this down, as it could be assumed that the figure noted purely relates to clinical space.</p> <ul style="list-style-type: none"> - In the Audit there was some pressure forecast for the Strathbrock Practices in the medium to longer term. This is not included in the Evidence Schedule. 	<p>Noted. There is a need to include these. Current figures are based on clinical staff using non-clinical rooms to deliver services.</p> <p>Noted. Current figures provided by NHS Lothian do not show capacity pressure at Strathbrock with housebuilding to 2035. Continued discussions required during the preparation of LDP2 to ensure sufficient capacity from proposed developments.</p>
<p>Joint Forum of Community Councils in West Lothian</p>	<ul style="list-style-type: none"> - The respondents partially agree that the evidence is sufficient. - The Joint Forum welcomes the fact that Version2 of this schedule is much more detailed than previously and welcome the closer co-ordination between the Council and NHS Lothian. It specifically welcomes: <ul style="list-style-type: none"> • recognition that healthcare capacity must shape where houses are built, rather than the Council simply approving houses and trying to fix the healthcare deficiencies later. • the detailed audit of GP practice list sizes and building capacities. • the explicit recognition that high-growth areas like Winchburgh and 	<p>Noted.</p> <p>Noted. Existing and future infrastructure will be assessed as part of the emerging LDP2.</p>

	<p>East Calder need urgent, specific infrastructure attention.</p> <p>However, while this represents a step in the right direction, it does not go far enough to protect communities from the current healthcare crisis.</p> <ul style="list-style-type: none">- The respondents believe the evidence base has several omissions that must be remedied before LDP2 is finalised. <p>Staffing and Reality vs. Physical Buildings</p> <p>The schedule states that GP staffing shortages and recruitment issues ‘do not form relevant planning considerations’ but the Joint Forum strongly objects to this view, pointing out that a new medical facility is useless to a community if there are no doctors or nurses to staff it.</p> <p>The respondents are adamant that planning cannot be carried out in a vacuum and that the Council and NHS Lothian must ensure healthcare facilities that can function safely and have the necessary capacity to take on new patients before allowing major new housing development to be built in their catchment.</p>	<p>Noted. However staffing of Primary Care is not a matter for Planning.</p>
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	<p style="text-align: center;">Healthcare Access and Public Transport</p> <p>The schedule fails to properly connect healthcare to how people actually travel and concludes that it is a failure of the planning system if a resident has to take two buses or drive for 45 minutes to see a doctor. New housing must therefore be directed to areas where healthcare is already within easy walking, wheeling, cycling, or bus distance. It is noted that dispersed, car-dependent housing estates isolate vulnerable patients and worsen health inequalities.</p> <p style="text-align: center;">Cumulative Impacts</p> <p>The evidence looks at developments too much in isolation. While a single estate might only add a few hundred patients to a local GP practice, five or six small developments approved incrementally over time completely overwhelm local services. LDP2 must explicitly calculate the total cumulative impact of all housing allocations on local surgeries.</p> <p style="text-align: center;">Climate & Community Resilience</p> <p>Healthcare facilities are critical emergency infrastructure. The evidence base lacks focus on Making these buildings climate-resilient (such as</p>	<p>The Proposed Plan will examine the spatial requirements alongside infrastructure requirements.</p> <p>Noted. Cumulative impact already assessed by NHS Lothian in practice methodology</p> <p>Noted.</p>
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	<p>ensuring they have adequate flood protections, Solar/energy backups, and green spaces) so that vulnerable and elderly people can safely access medical care during extreme weather events.</p> <ul style="list-style-type: none"> - The Joint Forum urges the Council to treat healthcare not just as a box-ticking exercise, but as a mandatory foundation for any future growth. - It recommends that the Council adopts a strict Brownfield-First and Infrastructure-First approach. - It wishes to see priority being given to upgrading existing town centres and regenerating old sites where healthcare infrastructure already exists, rather than enabling green field development and creating isolated communities with no medical support. - The respondents conclude by stating that a community cannot thrive without accessible healthcare. The LDP2 must protect the well-being of residents by ensuring that medical services expand before or alongside new housing and never after. 	<p>Noted.</p> <p>A full assessment of Local Place Plans is being carried out to inform the Proposed Plan.</p> <p>Noted.</p> <p>Noted. RAG scoring reflects existing and future population growth and infrastructure needs.</p>
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<p>Linlithgow and Linlithgow Bridge Community Council</p> <p><i>Dr John Kelly</i></p>	<ul style="list-style-type: none"> - The healthcare section shows one of the clearest advances. The Reporter at Gatecheck said the earlier work relied on outdated NHS information, lacked current practice and building data, did not deal adequately with cross-boundary issues and provided no timetable for further work. The updated ER states that primary care capacity has now been assessed across West Lothian GP practices with NHS Lothian, explains the clinical room methodology, reports that 16 of 20 practices have sufficient capacity, identifies those needing added capacity or further investigation, and introduces a RAG assessment in which Linlithgow is classed as amber. It also commits to continuing work with NHS Lothian as the proposed plan develops. Uncertainty remains, but the response is far stronger and more current than before. It is however a concern that Linlithgow is flagged as “amber”. 	<p>Noted. RAG scoring reflects existing and future population growth and infrastructure needs.</p> <p>Linlithgow Amber scoring is primarily based on existing capacity issues rather than a significant list size growth.</p>
<p>West Lothian Climate Action Network</p> <p><i>Rosslyn Barr</i></p>	<ul style="list-style-type: none"> • We particularly welcome: <ul style="list-style-type: none"> • the stronger alignment with NPF4 Policy 23 – Health and Safety and Infrastructure First principles; 	<p>Noted.</p>

	<ul style="list-style-type: none">• the detailed audit work undertaken by NHS Lothian regarding GP practice list sizes, staffing and building capacity;• the recognition that healthcare infrastructure capacity should be a significant factor in site selection and spatial strategy decisions;• the acknowledgement that healthcare infrastructure must be considered alongside population growth and housing allocations;• the evidence-based identification of practices where future capacity pressures are likely to arise;• the recognition that East Calder and Winchburgh require additional infrastructure consideration;• the commitment to continued collaboration between the council and NHS Lothian regarding healthcare infrastructure contributions; and• the stronger integration between healthcare infrastructure, local living and sustainable communities.	
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	<ul style="list-style-type: none"> • We also welcome: <ul style="list-style-type: none"> • the recognition that healthcare infrastructure is linked to wider community wellbeing and health inequalities; • the acknowledgement of the role of healthcare infrastructure within sustainable placemaking; and • the recognition that future growth must be aligned with infrastructure availability and delivery. <p>The revised schedule demonstrates a much stronger understanding that healthcare infrastructure planning should help shape the spatial strategy and not simply react to development after allocations have already been made.</p> <ul style="list-style-type: none"> • While the overall direction of the schedule is welcomed, we consider several important issues require further strengthening. <p>- Additional clarity is required regarding:</p>	<p>Noted</p> <p>Noted. RAG scoring reflects existing and future population growth.</p> <p>Noted. Cumulative impact already assessed by NHS Lothian in practice methodology</p>
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	<ul style="list-style-type: none"> • cumulative impacts arising from multiple housing allocations; • cross-boundary healthcare demand; and • long-term infrastructure funding and delivery responsibilities. <p>There is a risk that incremental development approvals may collectively place significant pressure on healthcare services even where individual developments appear manageable in isolation.</p> <p>- West Lothian Climate Action Network strongly supports the principle that healthcare infrastructure planning should be integrated with sustainable spatial planning, climate resilience and Local Living objectives. We recommend that future evidence gathering and policy development should also consider:</p> <ul style="list-style-type: none"> • healthcare accessibility by active travel and public transport; 	<p>Noted. RAG scoring reflects existing and future population growth and infrastructure needs.</p> <p>Noted.</p>
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	<ul style="list-style-type: none">• whole-life carbon impacts associated with healthcare infrastructure;• climate adaptation and resilience planning for healthcare facilities;• links between healthcare infrastructure and biodiversity / blue-green infrastructure;• demographic ageing and long-term care demand; and• cumulative infrastructure impacts associated with housing growth scenarios. <p>- We also encourage stronger integration between healthcare infrastructure planning and:</p> <ul style="list-style-type: none">• compact urban development and regeneration priorities;• brownfield-first development principles;• sustainable transport and accessibility objectives;• affordable and specialised housing delivery; and	<p>Noted</p>
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	<ul style="list-style-type: none"> • countryside belt / green belt objectives relating to sustainable settlement patterns. - We welcome the commitment to ongoing partnership working between the council and NHS Lothian. However, future planning policy should ensure that healthcare infrastructure is planned proactively, transparently and at a scale capable of supporting both existing and future communities. - Finally, we believe healthcare infrastructure should be understood not only as a service provision issue, but also as a climate resilience, equality and sustainable development issue. The Proposed Plan presents an important opportunity to align healthcare planning with wider goals relating to community wellbeing, emissions reduction and healthier place-making. 	<p>Noted</p> <p>Noted. All of these factors will be taken into account when developing the Proposed Plan, as a whole.</p>
<p>Homes for Scotland <i>Finn Watkins</i></p>	<ul style="list-style-type: none"> - The respondents do not agree that the evidence set out in the schedule is sufficient. <p>The updated Topic Paper notes that NHS Lothian have identified a requirement for 1.62 clinical spaces</p>	<p>The council does not agree with Homes for Scotland that there is insufficient evidence of future need to assess the requirement for additional infrastructure interventions.</p>

	<p>for every 1,000 patients on a GP Practice list. HFS would welcome sight of the report supporting this suggested ratio along with details of the number of current full-time equivalent healthcare professionals under each Primary Care staffing type (GP/ANP, Primary Care Improvement Plan staff and Health and Social Care Partnership staff) by GP practice as well as the number of staff employed in April 2022 around the time of the previous NRS population estimates. HFS shared evidence regarding staff shortages within the health service when responding to the previous Healthcare Infrastructure topic paper. Gaps in staffing resources need to be considered and understood by the Council alongside spatial constraints. Understanding staffing levels by practice will aid this.</p> <p>HFS welcomes the intention to support local living and aid certainty for developers by detailing any future requirements (including potential contributions) for development sites in Delivery Programmes. Developer contributions towards transport infrastructure to aid local living should also be set out in and justified through the emerging LDP process.</p>	<p>Indeed the lead developer (Winchburgh Developments Limited) in one of the areas identified as a “red practice” agrees with the council’s approach and commits to addressing any future capacity shortages.</p> <p>Summary of NHS Lothian practice methodology to be published. The primary care infrastructure requirement however is not defined by West Lothian Council but by NHS Lothian as the Key Agency responsible for healthcare.</p>
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Schedule 25 – Local Living and Community Infrastructure

Respondent	Comments	Response
<p>Walk Wheel Cycle Trust (formerly Sustrans)</p> <p><i>Mel Newbould</i></p>	<ul style="list-style-type: none"> - Welcomes the emphasis placed on Active travel throughout the Schedule - WWCT supports the review of West Lothian and SESTran’s strategic active travel network. - Keen to ensure that the full Network Development Plan, rather than just the current National Cycle Network, is captured in LDP2 to ensure opportunities are maximised to work together to fix and grow the network. Suggests that this could be included as an Arc GIS layer and would be happy to work with the Council to embed the NDP into settlement statements, design briefs and masterplans etc. - Suggests the inclusion of cycle routes in policies and also proposes examples of policy wording. - suggests the use of planning gain to improve cycle infrastructure. 	<p>All points noted. This evidence has been covered by other schedules, such as Schedule 26 on blue green infrastructure.</p>
<p>Ladywell Community Council</p> <p><i>Caroline Nicol</i></p>	<ul style="list-style-type: none"> - Suggests that the evidence base should more fully reflect the decline in local services and community facilities within individual neighbourhoods. - Notes that physical proximity to services does not always equate to accessible local living where 	<p>Noted. The Local Living Analysis will consider accessibility to services where they are not located within a 20 minute round trip by foot. This will include GP services.</p>

	<p>service provision, transport links, or community infrastructure are limited.</p> <ul style="list-style-type: none"> - While broadly agreeing with the evidence base it is nevertheless concluded that it underrepresents the weakening of neighbourhood-level facilities and community identity in parts of Livingston such as Ladywell. - Queries whether it currently fits with the walkability concept such as: <ul style="list-style-type: none"> • reduction/loss of local facilities • pressure on local community centres • varying accessibility between neighbourhoods • dependence on Almondvale rather than truly local provision. - The respondents identify the following areas of concern: <ul style="list-style-type: none"> • the loss of community infrastructure over time • safety of the underpasses/paths at night • Isolation of some areas despite physical proximity 	<p>Noted and understood. The Local Living analysis will note facilities an area lacks within a 20 minute round trip by foot and examine if these can be delivered through LDP2.</p> <p>Noted and understood. The schedule on Local Living sets out a flexible approach and acknowledges that a '20 minute neighbourhood'</p>
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	<ul style="list-style-type: none"> • concerns about accessibility to GP/dental services, • whether current “20-minute neighbourhood” assumptions reflect lived experience 	<p>will not always be feasible in all parts of West Lothian.</p>
<p>Woodland Trust Scotland <i>Hannah Patterson</i></p>	<p>- Notes the omission of document reference numbers relative to:</p> <ul style="list-style-type: none"> • WLC XXX LDP2 – Local Living Mapping • Circular 4/2025 • West Lothian Economic Investment Plan 2025-2035 • Para 2.5 - Background and Technical Note on Local Living • Annex X) classified through use of the Scottish Government’s Urban Rural Classification 2022 • West Lothian Retail Survey 2025’ • Table x – Local Living Tasks Timetable’ 	<p>Noted. Referencing to be fixed as Evidence Report is finalised.</p>

	<ul style="list-style-type: none"> • References to 2018 retail unit survey for local neighbourhood centres • References to retail capacity study in order to address the requirements of NPF4 Policy 28 • Reference to NPF4 Policy18' <ul style="list-style-type: none"> - the colouration on Figure 55 is unclear and should be clarified. - At para 2.18 it states that 'the Core Development Areas that have developed have had varied success in being able to deliver facilities that could contribute towards Local Living.'- The measurements for success should be explained. - Are best-practice cases to highlight for guidance? Any lessons to be learned to prevent future schemes being less successful? - It is stated that 'Winchburgh has delivered a new town centre, two primary schools and two secondary schools. - East Calder has delivered one new and one extended primary school, but not a local centre yet.' The respondent asks when is it expected? Is it delayed or is it on-schedule within a later phase of 	<p>Noted. The evidence base is higher level and there are a variety of reasons why certain have not delivered certain facilities.</p>
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	<p>the development? If it has been delayed, what are the reasons?</p> <ul style="list-style-type: none"> - It is stated that ‘Currently the council has four public toilet...’ and the respondent asks whether there is any standard requirement or any existing guidance for the availability of public toilets within urban areas? They note that facilities appear to be limited throughout West Lothian which is a significant barrier for many to engage with local community activities, use active travel routes or access other services. The respondent asks what the existing policy is in LDP1 and how this is expected to be amended? 	<p>There is no LDP1 policy on public toilet facilities. LDP2 is required by planning law to set out any policies and proposals on public conveniences.</p>
<p>Winchburgh Developments Limited (WDL) <i>Robin Matthew (PPCA)</i></p>	<ul style="list-style-type: none"> - Winchburgh Developments Limited agrees that the evidence set out in the Schedule is sufficient subject to the following comments. - The Council acknowledges that there is not a one size fits all approach and that is welcomed. The ongoing expansion of Winchburgh is delivering development in line with local Scottish Government Place Principles, living principles, active travel and Development Plan requirements and creating new communities. - The Winchburgh 2035 Vision document continues to promote development in areas that complies with the above principles. - With regards to para 2.18 of the Schedule, Winchburgh has also delivered a marina, 	<p>Noted. The facilities and amenities delivered at Winchburgh to date will be recognised in the Local Living Analysis, where applicable.</p>

	<p>sustainable transport options and new district and neighbourhood park provision and these should be recognised as contributing to local living principles.</p>	
<p>Key Agency - Scottish Water <i>Dave Bissett</i></p>	<ul style="list-style-type: none"> - Scottish Water has no objection to the evidence base or overall policy direction. - Scottish Water agrees with the evidence presented within this Topic Schedule and supports the overall approach to: <ul style="list-style-type: none"> • promoting Local Living and place-based planning, • strengthening community infrastructure and accessibility, and • aligning development with NPF4 Policy 15 (Local Living) and Policy 18 (Infrastructure First). - Scottish Water particularly supports: <ul style="list-style-type: none"> • the focus on town and local centres as key hubs, • the integration of housing, services, and transport, and 	<p>All comments are noted.</p>

	<ul style="list-style-type: none"> the recognition of the need for cross-service and cross-agency collaboration. 	
<p>LCP Retail Properties Ltd <i>Owen Brown (JLL)</i></p>	<ul style="list-style-type: none"> - LCP Retail Properties Ltd (LCP) are the owners of The Centre and surrounding land in Livingston and have previously engaged with the Council as part of the Evidence Gathering stage, providing information that has inputted to the Topic Papers. - In addition to the previous, LCP recognises transport connectivity and active travel infrastructure as fundamental considerations for town centre developments and endorses further investigation into identified connectivity gaps. - LCP supports the flexibility of uses allowed within the town centre. - Mobile banking hubs represent important community services and these uses should be supported within town centres. - LCP are committed to engaging with the Council for this important stage in the process for delivering the new West Lothian LDP2. 	All comments are noted.
<p>Joint Forum of Community Councils in West Lothian</p>	<ul style="list-style-type: none"> - The respondents do not agree that the evidence is sufficient. 	Noted.

	<ul style="list-style-type: none">- While the Joint Forum strongly supports the idea of Local Living (ensuring residents can access shops, schools, and healthcare near their homes), the evidence gathered is not yet sufficient to make this a reality. - The Joint Forum welcome the fact that Version 2 acknowledges:<ul style="list-style-type: none">• Local Living must look different in rural villages compared to larger towns.• Successful communities require joined-up working between housing, transport, and NHS Lothian.• Local Place Plans created by communities themselves must be respected. <p>However, the Council admits in this document that a full analysis of West Lothian’s towns and villages for Local Living has not yet been done. Leaving this analysis incomplete while continuing to draft the LDP2 is regarded as a major oversight.</p>	<p>A timetable for completing the Local Living Analysis is set on in the schedule. The analysis will also examine how sites chosen for the Proposed Plan can potentially plug gaps in Local Living.</p>
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	<p>The respondents argue that the evidence base completely ignores several harsh realities that currently prevent Local Living in West Lothian:</p> <p>The Urban vs. Rural Divide (Transport Poverty)</p> <p>The schedule notes that rural communities will always rely on cars, but it fails to gather evidence on the real-world impact of this.</p> <p>With ongoing cuts to local bus services, rural residents who do not drive are being completely cut off from basic services.</p> <p>Without mapping bus frequencies, safe walking routes between villages, and the cost of travel, Local Living policies will completely fail our rural areas and worsen local inequalities.</p> <p>Crumbling and Unstaffed Community Infrastructure</p> <p>While the schedule talks about community hubs it simultaneously lacks an honest assessment of the state of current community assets. Many existing community centres, libraries, and halls are in poor condition, underfunded, or facing closure.</p>	<p>Bus routes and frequencies have been mapped as part of setting up the Local Living Analysis. The cost of bus travel is set by transport operators.</p> <p>The Proposed Plan will examine the infrastructure required to support the LDP2 spatial strategy. The staffing of community facilities and GP surgeries are not matters the Proposed Plan is able to consider regarding infrastructure.</p>
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	<p>Furthermore, as stated in our responses to other schedules, a community hub or GP surgery cannot support Local Living if it does not have the staffing capacity to operate. Infrastructure requires people, not just buildings.</p> <p>Allowing Housing Sprawl Instead of Compact Growth</p> <p>Local Living works best when communities are compact. However, the current planning system allows developers to build massive, sprawling estates on green fields at the edges of our towns. Such development swallow up the countryside and force people to drive for everyday tasks. LDP2 must gather firmer evidence on how to prioritise Brownfield-First (building on derelict or underused land) to regenerate existing town centres where services already exist.</p> <p>Lack of Green Spaces and Climate Safety</p> <p>Access to nature, safe parks, and community spaces is vital for public mental and physical health. However, the respondents feel that the evidence base treats green spaces as an afterthought rather than a core part of a liveable community. It also fails to account for how local infrastructure will cope with climate impacts like localised flooding.</p>	<p>Access to open space forms a key part of Local Living. The council is separately developing an Open Space Strategy. The analysis of the quality and quantity of green space within the Open Space Strategy will help inform Local Living.</p>
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	<p>The Joint Forum believes that Local Living should not just be a buzzword used to approve more housing. It must mean a better quality of life for existing and future residents.</p> <p>To make the LDP2 robust, we recommend the Council enforces policies that:</p> <ul style="list-style-type: none">• Protect Social Spaces: Give heavy weight to protecting and upgrading local libraries, community centres, and sports facilities.• Support Local Resilience: Include space for community-led initiatives like allotments, community food growing, and local energy projects.• Upgrade before expanding, focussing on fixing, retrofitting, and filling empty shops and buildings in existing town centres before giving developers permission to develop green fields.• Take genuine note of the Local Place plans which are created by Community Councils who know are much closer to knowing what local communities lack.	<p>Community food growing is supported and is covered further under Schedule 26 Blue Green Infrastructure.</p> <p>A full assessment of Local Place Plans is being carried out to inform the Proposed Plan.</p>
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	<ul style="list-style-type: none"> - The respondents conclude by stating that Local Living will be impossible to realise if residents are forced to leave their towns and villages just to access basic, everyday necessities. The LDP2 must use real evidence to fix current infrastructure deficits before sanctioning further growth. 	
<p>West Lothian Climate Action Network <i>Rosslyn Barr</i></p>	<ul style="list-style-type: none"> - We welcome the breadth of evidence included within Topic Schedule 25 and strongly support the recognition of Local Living as a key principle for the emerging Local Development Plan. In particular, we welcome: <ul style="list-style-type: none"> • the acknowledgement that local living must reflect West Lothian’s varied urban and rural character; • the strong links made between local living, climate resilience, health, active travel, housing and economic development; • the emphasis placed on active travel and reducing car dependency; • the recognition of the importance of brownfield redevelopment and reuse of vacant and derelict land; 	<p>Noted.</p>

	<ul style="list-style-type: none">• the integration with Local Place Plans and community priorities;• the inclusion of local living mapping methodologies and accessibility analysis;• the recognition that successful local living can contribute positively to health, wellbeing and zero carbon communities;• the acknowledgement that infrastructure, education and healthcare capacity are important components of successful local living; and• the recognition that town and local centres should form focal points for local living. <p>We also welcome the commitment to cross-service working involving planning, housing, roads, public transport, climate change and NHS Lothian Public Health.</p> <ul style="list-style-type: none">- The revised Version 2 schedule provides a significantly more developed and evidence-rich framework than earlier versions and demonstrates a stronger understanding of the relationship between local living, sustainable	
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	<p>transport, infrastructure planning and climate objectives.</p> <ul style="list-style-type: none"> - However, while the schedule provides a useful overview of the policy context and planned methodology, we do not consider the evidence base to yet be fully sufficient for informing future spatial strategy decisions. A number of important evidence gaps remain, particularly regarding climate impacts, transport inequality, energy resilience and accessibility for vulnerable groups. - The schedule acknowledges that a “full analysis of all towns and villages in West Lothian for Local Living has yet to be undertaken” and that further work will continue through 2026. We consider this a significant evidence gap given the importance Local Living will have within the Proposed Plan. - In particular, we believe additional evidence is required in the following areas: <p>1. Climate and carbon assessment</p>	<p>A timetable for completing the Local Living Analysis is set on in the schedule. The analysis will also examine how sites chosen for the Proposed Plan can potentially plug gaps in Local Living.</p>
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	<ul style="list-style-type: none"> - The schedule refers to climate change and zero carbon communities but does not include measurable evidence regarding: <ul style="list-style-type: none"> • carbon emissions associated with transport patterns; • potential emissions reductions from Local Living interventions; • climate resilience of settlements; • energy efficiency and renewable energy integration within communities; and • whole-life carbon implications of different spatial growth patterns. - The Proposed Plan should be informed by clear carbon reduction modelling aligned with West Lothian’s climate targets and Scotland’s net zero commitments. <p>2. Rural transport disadvantage</p>	<p>Schedule 1 on climate change and Schedule 22 on sustainable transport references carbon emissions and emissions from transport.</p> <p>Schedule 1 on climate change states the Proposed Plan should support a modal shift from petrol and diesel car use to support emissions reduction.</p>
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	<ul style="list-style-type: none"> - The schedule correctly notes that some rural communities will continue to rely on cars. However, more evidence is required on: <ul style="list-style-type: none"> • public transport frequency and affordability; • accessibility for non-drivers; • rural fuel poverty and transport poverty; • safe active travel routes between settlements; and • connectivity to employment, education and healthcare. <p>Without this evidence there is a risk that Local Living policies unintentionally reinforce inequalities between urban and rural communities.</p> <p>3. Community infrastructure and resilience</p> <ul style="list-style-type: none"> - The schedule references community hubs and facilities but lacks detailed assessment of: 	<p>Bus routes and frequencies have been mapped as part of setting up the Local Living Analysis.</p> <p>The cost of bus travel is set by transport operators and the staffing of community facilities is not something the Proposed Plan can consider.</p> <p>Community facilities have been mapped for accessibility in setting up the Local Living analysis. The Proposed Plan is not able to determine staff</p>
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	<ul style="list-style-type: none"> • existing community asset condition and accessibility; • resilience infrastructure such as warm hubs, local energy generation and flood resilience; • availability of accessible community spaces; and • long-term viability and staffing capacity of local services. <p>Stronger coordination is also required between the council, NHS Lothian, education providers and infrastructure agencies to ensure that schools, GP practices, dentists, healthcare facilities and community services have both the physical infrastructure and staffing capacity required before major development is approved.</p> <p>Climate-resilient community infrastructure should be considered a core component of Local Living.</p> <p>4. Nature and biodiversity integration</p> <ul style="list-style-type: none"> - While open space is referenced, the schedule could more strongly address: 	<p>resourcing of community facilities and local services.</p>
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	<ul style="list-style-type: none"> • nature recovery; • biodiversity connectivity; • urban greening; • sustainable drainage; • countryside belt and green belt integration; and • access to nature as part of Local Living. <p>Green infrastructure should not be treated separately from Local Living but integrated into the core methodology and spatial strategy.</p> <p>5. Compact urban development</p> <ul style="list-style-type: none"> - The schedule would benefit from stronger recognition that Local Living principles are most effectively delivered through compact urban development, regeneration and brownfield first approaches rather than continued outward expansion and dispersed car-dependent growth patterns. - Stronger links should therefore be made between Local Living objectives and: 	<p>Access to open space forms part of Local Living. The council is separately developing an Open Space Strategy. The analysis of the quality and quantity of green space within the Open Space Strategy will help inform Local Living. Green infrastructure will form part of Local Living in this context.</p> <p>Para 2.16 notes the wide range of open spaces mapped as part of the council’s evidence base and that the development of Local Living in LDP2 will require to take account of the Open Space Strategy being developed. Site selection for LDP2 will require to take account of surface water (pluvial) and watercourse (fluvial) flood risk.</p> <p>Noted. Development that is closer to existing services will reduce car dependency and be more accessible by walk, wheel and cycling. The site appraisal will take account of accessibility to town, local and neighbourhood centres.</p> <p>Noted. All of these factors will be taken into account when developing the Proposed Plan, as a whole.</p>
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	<ul style="list-style-type: none">• brownfield redevelopment;• sustainable transport accessibility;• town centre regeneration; and• countryside belt / green belt objectives relating to settlement containment and prevention of coalescence. <p>- West Lothian Climate Action Network strongly supports the principle that Local Living should reduce the need to travel and improve quality of life while supporting climate goals.</p> <p>To strengthen the Proposed Plan we recommend:</p> <ul style="list-style-type: none">• embedding climate mitigation and adaptation objectives directly within Local Living assessment criteria;• prioritising investment in safe walking, wheeling and cycling infrastructure between settlements and local centres;• ensuring all new developments include accessible green space, biodiversity	
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	<p>enhancement and climate-resilient design;</p> <ul style="list-style-type: none">• supporting retrofit and reuse of existing buildings and town centres before greenfield expansion;• including stronger references to community energy, food growing and circular economy initiatives;• giving greater weight to social infrastructure such as libraries, community centres, repair hubs and local cultural facilities• ensuring communities are actively involved in shaping Local Living priorities through Local Place Plans and ongoing participatory engagement;• integrating Local Living objectives with compact urban growth, brownfield-first development and sustainable transport strategies; and• ensuring local living principles are aligned with biodiversity, blue-green infrastructure and countryside belt / green belt objectives	
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	<ul style="list-style-type: none"> - We also encourage the Council to ensure that Local Living is monitored through measurable indicators, including: <ul style="list-style-type: none"> • active travel uptake; • access to services; • emissions reduction; • public health outcomes; • accessibility for vulnerable groups; and • infrastructure delivery performance. - Finally, we support the intention to align Local Living with the Local Outcomes Improvement Plan and wider sustainability objectives. We believe this presents a significant opportunity for West Lothian to deliver healthier, lower-carbon and more resilient communities if supported by robust evidence, strong infrastructure planning and ambitious implementation. 	
Homes for Scotland	New housing has the potential to support local living through sustainable transport initiatives and the infrastructure first approach. The Councils recognition that the context across West Lothian varies and	All comments are noted.

	<p>preference for a local living rather than 20-minute neighbourhood approach is supported.</p> <p>Homes for Scotland (HFS) welcomes the Councils commitment to analyse local living across the council area and to identify gaps and potential solutions to plug these gaps. HFS would encourage the Council to engage with site promoters in the vicinity of gaps in provision to see what could reasonably be incorporated into future housing proposals.</p> <p>HFS welcomes the intention to support local living and aid certainty for developers by detailing any future requirements (including potential contributions) for development sites in Delivery Programmes. Developer contributions towards transport infrastructure to aid local living should also be set out in and justified through the emerging LDP process.</p> <p>It is noted that the Council have both updated their retail unit survey for local centres and undertaken a retail capacity study. The latter has identified a small floorspace requirement for convenience floorspace across the council area. Large scale residential proposals of circa 500 homes may be able to incorporate retail provision to support local living for new and existing residents of a community. When</p>	
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	<p>scoring sites promoted for housing the council is urged to discuss whether gaps in retail provision can be addressed as part of a housing allocation.</p> <p>HFS welcomes the Councils recognition that evidence of need is required, for example community hubs, and that any contributions must comply with the tests within Circular 4/2025 and NPF4 Policy 18. When considering deliverability of a proposed housing allocation the Council should consider the collective burden of potential contributions to ensure that a proposal remains viable and that housing can be delivered and the positive impacts on health and wellbeing realised.</p>	
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Schedule 26 – Blue Green Infrastructure and Open Space

Respondent	Comments	Response
Key Agency – SEPA <i>Alasdair Milne</i>	<ul style="list-style-type: none"> - Confirms satisfaction with the sufficiency of version 2 of the Topic Schedule – No change sought. 	Noted.
Michael Philpott	<ul style="list-style-type: none"> - References his ‘Call for Ideas’ submission and his wish for the allocation of a site as open space to be removed. 	Noted – this will be considered in the preparation of the new Open Space Strategy.
Walk Wheel Cycle Trust (formerly Sustrans) <i>Mel Newbould</i>	<ul style="list-style-type: none"> - Welcomes reference to NCN 75 and NCN 76 mentioned, alongside the Union Canal but would also wish to see NCN 754 mentioned as this largely follows the canal towpath, and is an important linear Blue Green space. - Similarly, notes that NCN 75 is mentioned in the Core Paths and Active Travel Section, but there’s no mention of NCN 754 in this context. NCN 76 also follows a core path through West Lothian between South Queensferry and Blackness. - WWCT invite the Council to recognise the potential contribution that their Network Development Plan can make towards creating and strengthening green networks, for access to greenspace, active travel and recreational and biodiversity improvements. - Advise that aspart of their Biodiversity Action Plan (BAP), they are keen to explore opportunities to map existing habitats present along the National Cycle Network and understand what quantifiable improvements could be made to those habitats. 	The additional NCN routes have been included in the Topic Schedule where referenced in the response. All other comments noted.

	<ul style="list-style-type: none"> - Welcomes the fact that Scottish Rights of Way and Access Society (ScotWays) are standard consultee, and the West Lothian Local Access Forum will be consulted on blue and green infrastructure proposals. - Notes that WWCT welcomes opportunities to collaborate and explore synergy between regional scale and local scale blue and green infrastructure networks and their Network Development Plan. 	
<p>Ladywell Community Council <i>Caroline Nicol</i></p>	<ul style="list-style-type: none"> - Blue and green infrastructure must be treated as essential to support the environment, climate resilience, and public health. Specifically, Livingston’s signature networks of paths and green spaces must be protected and enhanced as the area undergoes future development. - The respondents identify the following areas of concern: <ul style="list-style-type: none"> • Overgrown Tree Cover: High density causes poor night visibility and safety anxieties. • Unkept Biodiversity Zones: Nature initiatives are welcome but must not compromise local neatness. • Frequent Flooding: Specific areas in Ladywell suffer from recurring drainage failures. - Open Spaces: Green areas risk being misclassified as surplus land for development. 	<p>Noted.</p>
<p>Woodland Trust Scotland <i>Hannah Patterson</i></p>	<ul style="list-style-type: none"> - Reference required for the ‘River recovery potential - prioritises passive river restoration actions’ 	<p>Noted. Added reference for ‘River recovery potential’. NatureScot’s biodiversity metric will be</p>

	<ul style="list-style-type: none"> - Although Scotland does not have a specific agreed legal metric- it would be beneficial to reference Biodiversity Net Gain within the schedules and note that NatureScot is in the process of actively developing a tailored Scottish biodiversity metric to better account for distinct Scottish habitats which aren't fully accommodated in the existing metric used in England. This concept will be particularly important when considering developer contributions to support local projects to enable 20-minute neighbourhoods and green/blue infrastructure. - All the references to Open space have also been noted in part 1 of schedule 15 play, recreation and sport- Perhaps it should only be referenced in schedule 15 as schedule 26 is specifically focused on Open Space to avoid repetition. 	<p>considered for the proposed plan when it has been finalised.</p>
<p>Scottish Forestry <i>Will Chadwick</i></p>	<ul style="list-style-type: none"> - Agrees that the Schedule is sufficient. Notes that this schedule cross-references the previously consulted Schedule 6, Forestry, Woodland and Trees and that schedule adequately outlined relevant policies, including NPF4 and the Scottish Government's Control of Woodland Removal Policy. 	<p>Noted.</p>
<p>Key Agency - Scottish Water <i>Dave Bissett</i></p>	<ul style="list-style-type: none"> - Scottish Water has no objection to the evidence base or overall policy direction. - Scottish Water strongly supports the evidence and approach set out within this Topic Schedule and welcomes the clear recognition that: 	<p>Noted.</p>

	<ul style="list-style-type: none"> • blue and green infrastructure (BGI) is essential infrastructure, it plays a fundamental role in managing surface water, reducing flood risk and improving water quality, and it contributes significantly to climate resilience, biodiversity and placemaking, in line with NPF4 Policy 20 and Policy 18 (Infrastructure First). - Scottish Water particularly supports: <ul style="list-style-type: none"> • the multi-functional approach to BGI, • the requirement for Sustainable Drainage Systems (SuDS), and the emphasis on natural flood management (NFM) and integrated networks. 	
<p>Linlithgow and Linlithgow Bridge Community Council <i>Dr John Kelly</i></p>	<ul style="list-style-type: none"> - The updated ER does not answer reporter’s criticism at first gatecheck in the same form, but it does strengthen the wider evidence base by treating blue and green infrastructure, open space and local living or community hubs as formal topic areas. The Local Living background note provides a method for identifying service accessibility and gaps, while the infrastructure topic schedule explains that open space and blue-green actions are to be taken forward through the proposed plan and delivery programme. The strategic response is therefore stronger, although some play and sport evidence may still need more explicit updating. 	<p>Noted – as part of the preparation of the proposed plan, a Play Sufficiency Assessment is also being prepared which aims to present an updated analysis of West Lothian’s play spaces, and the Open Space Strategy also being prepared will include analysis of sports spaces.</p>
<p>West Lothian Climate Action Network <i>Rosslyn Barr</i></p>	<ul style="list-style-type: none"> - The revised Version 2 schedule is substantially improved and provides a much more 	<p>All comments and suggestions noted.</p>

	<p>comprehensive and integrated evidence base for blue and green infrastructure, open space and active travel across West Lothian.</p> <ul style="list-style-type: none">- Particularly welcomes:<ul style="list-style-type: none">• the stronger emphasis on multifunctional blue and green infrastructure;• the integration of climate resilience, biodiversity enhancement and natural flood management;• the extensive GIS-based audit and mapping work;• the stronger treatment of accessibility, active travel and core path connectivity;• the recognition of ecosystem services and natural capital assessment;• the commitment to prepare a new comprehensive Open Space Strategy;• the expanded support for food growing, community gardens and allotments.- Welcomes the clearer recognition that blue and green infrastructure is essential infrastructure and not simply an environmental add-on.- Strongly welcomes overall direction of schedule and suggests several areas to be strengthened:<ul style="list-style-type: none">• the proposed plan should move beyond guidance and establish clearer policy requirements and minimum standards for	
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	<p>blue and green infrastructure integration within new development;</p> <ul style="list-style-type: none">• accessibility and inclusive design should be embedded consistently throughout all infrastructure planning and delivery mechanisms;• stronger commitments are needed regarding long-term maintenance, stewardship and funding for blue and green infrastructure assets;• the schedule should place greater emphasis on retrofitting blue and green infrastructure within existing urban areas, particularly in more deprived communities; and• the stakeholder engagement section remains incomplete, limiting transparency regarding how stakeholder views have informed the revised evidence base. <p>- Encourages stronger integration between this schedule and:</p> <ul style="list-style-type: none">• biodiversity and nature network delivery;• active travel and local living objectives;• climate adaptation and heat resilience planning; and• community wealth building and food resilience strategies. <p>- Welcomes the continued support for:</p> <ul style="list-style-type: none">• community gardens;• allotments;• local food growing initiatives; and• projects that improve biodiversity, soil health and public engagement with nature.	
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	<ul style="list-style-type: none"> - WLCAN members are involved in practical community initiatives including community growing projects, small-scale food growing beds, soil improvement and public education around soil health and composting systems. - We recommend that further evidence and future policy work should also consider: <ul style="list-style-type: none"> • urban greening and canopy targets; • biodiversity net gain and habitat connectivity metrics; • community stewardship models for open spaces; • opportunities for nature-based solutions in deprived communities; and • stronger monitoring frameworks for accessibility, open space quality and blue/green infrastructure delivery outcomes. - We support the continued development of integrated blue and green infrastructure networks as a core part of West Lothian’s climate resilience and wellbeing strategy. 	
<p>Homes for Scotland <i>Finn Watkins</i></p>	<ul style="list-style-type: none"> - While the respondents agree that the Schedule is sufficient, they do provide additional comments. <p>Blue and Green Infrastructure (BGI)</p> <ul style="list-style-type: none"> - The delivery of high quality BGI is a priority for HFS members with significant investment often made in incorporating green spaces into new developments. This includes biodiversity improvement measures such as wildflower meadows and tree planting, helping to make 	<p>All comments noted.</p>

	<p>homes more nature friendly and provide assets for the local community. Furthermore, home building has the ability to manage, maintain and enhance BGI whilst also creating connections and helping to strengthen habitat connectivity to allow safe movement for nature.</p> <ul style="list-style-type: none">- The schedule notes what the proposed plan will be required to do, which includes integrating BGI and open space in new developments. Significant investment is often made by HFS members in incorporating green spaces into new developments, this includes play provision which is made accessible to existing communities who may otherwise not have access to play space, sports provision or quality greenspaces. However, biodiversity requirements can have a detrimental impact on the cost of maintaining these open spaces for residents <p>Open Space Strategy</p> <ul style="list-style-type: none">- The Schedule states that the Open Space Plan 2020–2024 and the draft Open Space Plan 2025–2034 will not be taken forward and work for a new Open Space Strategy has been initiated and is programmed for completion in August 2026. This date is close to when the Council plans to share their proposed plan, therefore, HFS requests that the draft plan is made available for review before submission to the Gate Check to allow ample time for said review of the strategy by HFS and its members.	
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	<p>Developer Contributions Policy</p> <ul style="list-style-type: none">- The Council state in the implications for the proposed plan section in point 5 that they will: “Consider a specific policy requiring developer contributions towards blue and green infrastructure and open space.” Any policy must be based in evidence and consider marketability and deliverability to ensure Scotland’s housing needs are met, as we seek to address the National and Housing Emergency. Enabling HFS members to build homes in marketable locations is key to not only assisting in meeting housing targets, but that people have access to high quality housing in the areas in which they want to live in. <p>Play Sufficiency Assessment</p> <ul style="list-style-type: none">- The draft schedule states that the: “The Play Sufficiency Assessment will remain in draft form until the Open Space Strategy is finalised, at which point both documents will be aligned and finalised in tandem”. HFS request that the Play Sufficiency Assessment is made available for review. The Council should ensure that periods of consultation are adequate for meaningful feedback by stakeholders, especially when the results of assessments may impact upon stakeholders. As previously mentioned HFS members make significant investment into facilities such as play provision for communities.	
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	<p>SuDS Evidence Gap</p> <ul style="list-style-type: none">- The Council note that: “Currently there is no register of the number and location of SUDs schemes in operation in West Lothian. The Council believes that it would be desirable to identify SuDs schemes.” HFS agrees that it would be beneficial to identify the schemes, especially those that have come about due to new development. SuDS requirements can impact development viability, therefore, any evidence that will feed into potential policies or requirements needs to be up-to-date and credible. Scottish Water may be able to assist in identifying SuDs schemes where these have been or are in the process of being adopted by them.	
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