Integrated Impact Assessment

STEP1 – INTEGRATED RELEVANCE ASSESSMENT (IRA)

Proposal title (include budget reference if applicable)	West Lothian Local Development Plan 2
Service Area (detail which service area and section this relates to	Planning Services – Development Planning and Environment
Lead officer	Kate Hopper, Development Planning and Environment Manager
Other people involved (list names, job titles and other organisations if applicable)	
Date relevance assessed	18 November 2026

Tick the boxes you think apply	**No**	**Maybe**	**Yes**
Will your proposal have an impact on groups with 'Protected Characteristics?		X	X
Will your proposal have an adverse impact on people experiencing socio economic disadvantage?	X		
Does your proposal impact on the human rights of people?	X		X
Does your proposal impact on the rights of children and young people?	X		X

IF YOU HAVE TICKED YES OR MAYBE TO ANY OF THE ABOVE PROCEED TO FULL IIA – STEP 2

DECISION RATIONALE

SIGN OFF IF NOT PROGRESSING TO A FULL IIA

Signature (Head of Service or Depute Chief Executive responsible for the proposal)	
Date	

A detailed summary of the decision rationale should be included in any council reports and a copy of the IRA included with the background papers.

STEP 2 - FULL INTEGRATED IMPACT ASSESSMENT [LINK].

SECTION 1 - ABOUT THE PROPOSAL
Describe the proposal, including the aims, objectives and intended outcomes. Is this a new proposal or change to current practice? Who will it affect and how will it operate? Provide information on alternative options that are being considered.

The proposal. West Lothian Council is preparing a new Local Development Plan (LDP2) to replace the West Lothian Local Development Plan adopted in 2018. Once adopted, LDP2 and National Planning Framework 4 (NPF4) will together form the statutory development plan against which planning applications in West Lothian are decided. Preparing the plan is a statutory duty under the Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019.

Aims, objectives and intended outcomes. LDP2 sets out a spatial strategy, planning policies and site proposals for the use and development of land across West Lothian for a ten-year period. In line with NPF4 it is intended to be a deliverable, place-based and people-focused plan that:

- responds to the climate and nature crises;
- protects and enhances the natural and historic environment;
- recognises the link between place and health in order to reduce social, economic and health inequalities;
- provides enough land for homes of the right type and tenure, including affordable, accessible and specialist housing (the indicative minimum all-tenure housing land requirement accepted at Gate Check is 10,825 homes for 2028 to 2038);
- supports local living, so that people can meet most daily needs close to home by walking, wheeling, cycling or public transport;
- aligns development with the infrastructure it relies on, including schools, healthcare, transport, open space and play; and
- supports business, employment and town centres.

New proposal or change to current practice. LDP2 replaces an existing plan but is prepared under the new system introduced by the 2019 Act. It differs in style and content from the 2018 plan: it does not repeat NPF4 policy, focuses on local policies, places and sites, and is be accompanied by a Delivery Programme.

Stage reached. This IIA accompanies the preparation of the Proposed Plan.

Who it will affect and how it will operate. LDP2 will affect all West Lothian residents, together with businesses, landowners, developers, infrastructure providers and visitors. It does not deliver development directly. It operates through decisions on planning applications, through the Delivery Programme, and through the investment decisions of the council, housing providers, key agencies and the private sector.

Alternative options. There is no reasonable alternative to preparing a Local Development Plan, as this is a statutory requirement. Alternatives are considered within the plan-making process:

- Housing land requirement: the national minimum figure (9,850 homes) and the revised, locally evidenced figure of 10,825 were both considered. The revised figure includes an uplift to help meet the council's affordable housing ambition.
- Sites and spatial strategy: 409 submissions were received through the Call for Ideas (March to May 2025). These are assessed against the published Site Appraisal Methodology and through Strategic Environmental Assessment, which is required to assess reasonable alternatives.

- Policy options: informed by the Evidence Report topic schedules and stakeholder feedback.

Will the proposal be carried out by contractors or suppliers? This includes fully or partially. If yes, how will you incorporate equality expectations into the contract?

LDP2 is being prepared in-house by the Development Planning and Environment team. Some specialist technical studies that inform the plan have been commissioned from external consultants (for example retail, transport and landscape work). Appointments were made through the council's corporate procurement procedures.

SECTION 2 – EQUALITY IMPACT [LINK].

Please outline any effect or difference (positive and negative) this proposal will have on people with protected characteristics.

Think about the needs and/or barriers which equality groups (people with Protected Characteristics) may have in relation to this proposal.

People includes – employees, volunteers, service users and members of the public.

AGE

Does the proposal impact on people of a specific age?

This can be any age group – a person belonging to a particular age (for example, 32 year olds) or range of ages (for example, 18 to 30 year olds).

What effect/difference will the proposal have:

Overall: moderate positive impact, with some risks to manage.

Older people. The 75+ population is projected to grow faster than any other age group. LDP2 requires a mix of house types and tenures that includes homes suitable for older people, supports the delivery of specialist and supported housing, and by locating development where shops, healthcare and public transport are close by. Local living, good-quality paths, seating and accessible green space support independence and reduce isolation.

Children and young people. Policies on play, open space, sport and recreation, safe walking and cycling routes to school, and alignment of new housing with school capacity directly benefit children. A larger supply of affordable homes benefits young adults and young families.

Potential negative impacts.

- If housing growth runs ahead of the delivery of school, early years or healthcare capacity, children and older people are the groups most affected. Of 20 GP practices, the evidence shows 16 can absorb growth from current allocations, two need additional capacity and two need further investigation.

How do you know that – what evidence and research have you used?

- West Lothian LDP2 Evidence Report: draft Topic Schedule 9 Health, Wellbeing and Equalities, and Annex 1 Record of Engagement (submitted with the Evidence Report on 15 July 2026).
- LDP2 Background Paper: Health and Wellbeing in West Lothian (August 2024): 75 and over age group projected to grow by 39.4% and 0 to 15 age group to fall by 5.4% between 2018 and 2028; households projected to rise by 9.9% over the same period, with one-adult households growing fastest (14.6%).

- Housing Need and Demand Assessment 3 (2021), as reported in Topic Schedule 9: West Lothian had the highest number of households in South East Scotland requiring older persons' housing (2,694).
- Strategic Housing Investment Plan 2024/25 to 2028/29, as reported in Topic Schedule 9: 201 (8%) of the 2,500 homes planned could be suitable for older people.
- Engagement (Development Plan Scheme 2026): two targeted "How Good is Your Place" surveys of children and young people (October 2023); Play Sufficiency Survey (June to October 2024, over 1,000 responses); engagement at Linlithgow Academy, James Young High School and Winchburgh Primary School (January 2025); consultation with the Senior People's Forum; Citizen Panel "Your Place" survey (over 500 responses in total).
- Healthcare Infrastructure Audit (March 2026) and Gate Check decision (14 October 2026).

DISABILITY

Does the proposal impact on people with a visible or non-visible disability?

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

What effect/difference will the proposal have:

Overall: positive impact, with some risks to manage.

Positive. LDP2 is the main means of increasing the supply of accessible and wheelchair-accessible homes across all tenures, including in private developments where supply is weakest. Locating homes close to services reduces the travel burden on disabled people, who are less likely to have access to a car.

The Local Development Plan is expected to have a positive impact on disabled people by promoting the development of inclusive, accessible, and sustainable communities. Through planning policies and development requirements, the Plan can help to reduce physical and social barriers that may otherwise limit participation in community life.

The Plan supports disabled people by:

- Encouraging the delivery of accessible and adaptable housing, including homes that support independent living and can be adapted to meet changing needs.
- Promoting inclusive design principles in the development of public spaces, community facilities, and infrastructure to improve accessibility for people with a range of disabilities.
- Supporting the provision of accessible transport networks, walking and wheeling routes, and connections to local services and amenities.
- Influencing the location of new development to improve access to employment, healthcare, education, and community services.
- Contributing to reduced social isolation by creating environments that enable disabled people to participate more fully in community and civic life.

Potential negative impacts.

- Local living standards based on walking distance can overlook people who cannot walk those distances, or who need to drive and park close to their destination.

- Current delivery of wheelchair-accessible housing is below target, so without a clear policy requirement the gap may persist.

How do you know that – what evidence and research have you used?

- West Lothian LDP2 Evidence Report: draft Topic Schedule 9 Health, Wellbeing and Equalities, and Annex 1 Record of Engagement (submitted with the Evidence Report on 15 July 2026). It records a 10% wheelchair-accessible housing target against 136 wheelchair homes (5%) in the Strategic Housing Investment Plan 2024/25 to 2028/29, around 2,000 households lacking the adaptations or support they need, and asks whether a specific policy is needed to secure accessible private housing.
- Health and Wellbeing Background Paper (August 2024): around a third of residents report a limiting long-term condition; 14% provide regular unpaid care; 9,290 Adult Disability Payment and 3,725 Child Disability Payment recipients (2024).
- West Lothian Local Housing Strategy 2023 to 2028 and its Integrated Relevance Assessment.
- Engagement: workshop with disabled people through the West Lothian Disability Access Forum (February 2025); "How Good is Your Place" survey version for disabled people (October 2023).
- NPF4 Policy 14 (Design, quality and place), Policy 15 (Local living) and Policy 16 (Quality homes).

GENDER REASSIGNMENT

Does the proposal impact on people who have undergone or propose to undergo a process for the purpose of reassigning their gender to one which is different to that assigned at birth?

What effect/difference will the proposal have:

Overall: no differential impact identified

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How do you know that – what evidence and research have you used?

- West Lothian Council Equality and Diversity Framework 2025 to 2029 and the community engagement that informed it.
- No issues specific to this group were raised through LDP2 engagement to date.

MARRIAGE OR CIVIL PARTNERSHIP

Does the proposal impact on people who are married or in a civil partnership or those who are not?

Marriage is a union between a man and a woman or between a same-sex couple.

What effect/difference will the proposal have:

Overall: no differential impact identified.

LDP2 policies and proposals apply regardless of marital or civil partnership status. The plan will provide for a range of house sizes and types to suit different household structures, including the growing number of single-adult households, but this does not advantage or disadvantage people because they are, or are not, married or in a civil partnership.

How do you know that – what evidence and research have you used?

- Review of the scope of LDP2 against this characteristic.
- No issues raised through LDP2 engagement to date.

PREGNANCY AND MATERNITY

Does the proposal impact on people who pregnant or have recently had a baby?

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave.

What effect/difference will the proposal have:

Overall: positive impact.

Pregnant women and parents with babies and young children benefit from homes located close to healthcare, childcare, shops and public transport; from step-free, well-maintained and well-lit routes suitable for prams and buggies; from accessible green space and play space; and from healthcare capacity keeping pace with new housing. Family-sized and affordable homes help households whose space needs change.

Potential negative impact. Pressure on primary care and maternity-related services if development is not phased with healthcare capacity. Engagement events held only in the evening or without child-friendly arrangements can exclude new parents.

How do you know that – what evidence and research have you used?

- West Lothian LDP2 Evidence Report: draft Topic Schedule 9 Health, Wellbeing and Equalities, and Annex 1 Record of Engagement (submitted with the Evidence Report on 15 July 2026).
- Healthcare Infrastructure Audit (March 2026) and continuing joint work with NHS Lothian on capacity and developer contributions.
- Topic Schedule 25 Local Living and Community Infrastructure and the Local Living Background and Technical Note.

RACE

Does the proposal impact on people of a specific racial group or groups?

A race is a group of people defined by their colour, nationality (including citizenship) ethnicity or national origins.

What effect/difference will the proposal have:

Overall: potential positive impact for Gypsy/Travellers, dependent on action; no differential impact identified for other racial groups.

Gypsy/Travellers. Gypsy/Travellers are a recognised ethnic group and one of the groups whose views the 2019 Act specifically requires the council to seek. The council is exploring negotiated stopping places. LDP2 includes a policy framework for private sites, transit provision and negotiated stopping, in line with NPF4 Policy 16.

Minority ethnic communities. LDP2 policies apply equally to all. Affordable housing, access to employment land and good-quality local facilities benefit minority ethnic households, who nationally are more likely to live in overcrowded or private rented housing and to experience poverty.

How do you know that – what evidence and research have you used?

- Gate Check decision (14 October 2026): advisory on Gypsy/Traveller accommodation needs.
- Strategic Housing Investment Plan 2026 to 2031: no dedicated Gypsy/Traveller site; matter to be considered further in LDP2.
- Scotland's Census 2022: 70 people identified as White Gypsy/Traveller (recognised as an under-count).
- Development Plan Scheme and Participation Statement 2026: engagement through the council's Travellers Forum and the Lothian Gypsy Traveller Forum.
- Local Housing Strategy 2023 to 2028 Integrated Relevance Assessment, which identified a need for further engagement with Gypsy/Travellers on housing options.

RELIGION OR BELIEF

Does the proposal impact on people of a specific religion or belief?

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief.

What effect/difference will the proposal have:

Overall: no significant differential impact identified

How do you know that – what evidence and research have you used?

- Cultural Facilities Audit (June 2026) and Topic Schedule 25 Local Living and Community Infrastructure.
- No issues specific to religion or belief were raised through LDP2 engagement to date.

SEX

Does the proposal have a specific impact on men or women?

What effect/difference will the proposal have:

Overall: positive impact, particularly for women and girls.

Women and girls.

The Local Development Plan is expected to have a positive impact on women by supporting the creation of safe, accessible, and inclusive communities that reflect the needs of women and girls. Women often experience places differently due to caring responsibilities, personal safety concerns, patterns of employment, and access to services. Local living, a better choice of affordable homes, local employment land and accessible childcare, schools and healthcare can have a positive effect on women.

The Plan supports women by:

 Promoting the delivery of housing in locations with good access to schools, childcare, healthcare, employment opportunities, and community facilities, helping to reduce travel burdens often associated with caring responsibilities.

 Supporting the development of safe, well-lit public spaces, walking routes, and transport connections that can improve perceptions of safety and encourage participation in community life.

 Encouraging mixed-use and well-connected neighbourhoods that provide access to services and amenities within reasonable travelling distance.

 Supporting access to affordable housing, which can be particularly beneficial for women who are more likely to experience economic inequality, lone parenthood, or housing insecurity.

 Promoting access to employment land and economic development opportunities, helping to support women's participation in the labour market.

 Enhancing access to green spaces, recreation facilities, and community infrastructure that contribute to health, wellbeing, and social connectedness.

Men. Men have lower life expectancy and higher rates of drug-related death and suicide. Policies that improve access to green space, active travel, good housing and employment, and that tackle vacant and derelict land, support better health outcomes.

How do you know that – what evidence and research have you used?

- Health and Wellbeing Background Paper (August 2024): 23.5% of women feel "very safe" in their community compared with 43.2% of men; women report higher rates of anxiety or depression (57.6% compared with 49%); life expectancy 80.5 years for women and 77.1 for men; the paper recommends spaces designed with girls in mind.
- West Lothian LDP2 Evidence Report: draft Topic Schedule 9 Health, Wellbeing and Equalities, and Annex 1 Record of Engagement (submitted with the Evidence Report on 15 July 2026).
- NPF4 Policy 14 and the six qualities of successful places

SEXUAL ORIENTATION

Does the proposal have a specific impact on people who are LGBTQ+?

Sexual orientation refers to whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

What effect/difference will the proposal have:

Overall: no differential impact identifieed.

How do you know that – what evidence and research have you used?

- West Lothian Council Equality and Diversity Framework 2025 to 2029.
- No issues specific to this group were raised through LDP2 engagement to date.

SECTION 3 - HUMAN RIGHTS [LINK].

There is a distinction in the Human Rights Act between absolute and qualified rights. Absolute rights cannot be lawfully restricted. Absolute rights include the right to life and the right not to be tortured or treated in an inhuman or degrading way. Qualified rights include:-

- The right to respect for private and family life, home and correspondence
- The right to freedom of thought, conscience and religion
- The right to freedom of expression
- The right to freedom of assembly and association
- The right to protection of property

To consider whether a restriction to a qualified right is justified, please consider the following questions:

- **Is there a legal basis for the restriction of the right? Is it lawful?**
- **Is there a legitimate aim or justification for the restriction, such as the protection of other people's human rights, public safety, and health?**
- **Is the action proportionate - is it the minimum necessary restriction of the right?**

Please provide your response here:

LDP2 does not affect any absolute right. It engages the following qualified rights:

- **Article 1 of Protocol 1 (protection of property).** Allocating land for development, or designating land for protection (for example countryside belt, open space or nature network), affects what owners can do with their land and its value.
- **Article 8 (private and family life and home).** New development can affect the amenity of neighbouring homes. For Gypsy/Travellers, Article 8 includes respect for a traditional way of life, which is relevant to how the plan addresses sites and stopping places.
- **Article 6 (fair hearing)** and **Article 14 (non-discrimination)** are relevant to how the plan is prepared and examined.

Legal basis. Yes. LDP2 is prepared under the Town and Country Planning (Scotland) Act 1997 as amended, and associated regulations. The planning system as a whole has been held to be compatible with the Convention.

Legitimate aim. Yes. Planning regulates the use of land in the long-term public interest, including the economic wellbeing of the area, the protection of health and the environment, and the rights of others to housing and services.

Proportionality. Yes. Policies and allocations are based on a published evidence base that has passed Gate Check; landowners, neighbours and communities can make

representations at Proposed Plan stage; unresolved representations are considered by an independent Reporter at Examination; there is a statutory right of legal challenge; and individual proposals remain subject to planning applications with neighbour notification and rights of appeal.

Positive impacts. The plan supports the progressive realisation of economic, social and cultural rights, including adequate housing, health and a healthy environment. Plan preparation is set out in the Participation Statement, public reporting to council, this IIA, support for Local Place Plans.

How do you know that – what evidence and research have you used?

- Human Rights Act 1998 and European Convention on Human Rights.
- Town and Country Planning (Scotland) Act 1997, Planning (Scotland) Act 2019, the Town and Country Planning (Development Planning) (Scotland) Regulations 2023 and Local Development Planning Guidance (2023).
- Development Plan Scheme and Participation Statement 2026; draft Participation Statement (consultation to 20 November 2026).
- Topic Schedule 9, which sets out the PANEL principles; Gate Check decision (14 October 2026).
- Eight registered Local Place Plans, with seven further community groups interested.

SECTION 4 - CHILDREN'S RIGHTS [LINK].

Please outline any effect or difference (positive and negative) this proposal will have on children's rights under the United Nations Convention of the Rights of the Child (UNCRC)

Describe, where applicable, how specific children's rights are impacted. Which articles of the UNCRC does the proposal impact on? Here is a link to a Plain English version - The Convention on the Rights of the Child - UNICEF

Overall: positive impact. LDP2 shapes the homes, streets, schools and spaces in which children grow up. The following UNCRC articles are affected:

- **Article 3 (best interests of the child).** Children's needs are considered in policies on housing, play, open space, education infrastructure and safe travel.
- **Article 12 (respect for the views of the child).** Children and young people are a statutory consultee group for the Evidence Report. Their views were gathered through dedicated surveys, the play survey and school engagement, and will be sought again on the Proposed Plan.
- **Article 15 (freedom of association).** Provision of public spaces, parks and community facilities where young people can meet.
- **Article 23 (children with a disability).** Inclusive and accessible play space, schools, homes and routes.
- **Article 24 (health and health services).** Access to green space, active travel, clean air, healthy food environments and healthcare capacity. Children in the most deprived communities are almost twice as likely to be at risk of obesity on entering Primary 1.
- **Article 27 (adequate standard of living).** More affordable, warm and suitably sized homes; 24.1% of West Lothian children live in poverty.
- **Articles 28 and 29 (education).** Matching housing growth to school and early years capacity, and safe routes to school.
- **Article 31 (leisure, play and culture).** The Play Sufficiency Assessment, open space strategy and policies protecting and requiring play, sport and recreation space.

Potential negative impacts. Development on land that children use informally for play; school capacity pressure if infrastructure is not phased with housing.These are addressed in Section 9.

How do you know that – what evidence and research have you used?

- Children's and Young Person's "How Good is Your Place" surveys (October 2023).
- Open Space and Play Questionnaire for Children and Young People / Play Sufficiency Survey (June to October 2024): over 1,000 responses; school engagement (January 2025).
- Evidence Report topic schedule on play, recreation and sport; Topic Schedule 26 Blue Green Infrastructure Open Space; Open Space Strategy Database (September 2026).
- West Lothian Poverty Profile 2026 and Local Child Poverty Action Report.
- Topic Schedule 9 and the Health and Wellbeing Background Paper.
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024; Scottish Government guidance on taking a children's human rights approach.

SECTION 5 - SOCIO ECONOMIC DISADVANTAGE [LINK].

Please outline any effect or difference (positive and negative) this proposal which may affect people who are vulnerable to experiencing poverty and disadvantage.

What effect/difference will the proposal have:

Overall: moderate positive impact. No adverse impact on people experiencing socio-economic disadvantage has been identified.

Low income and low wealth. The housing land requirement includes an uplift to support the council's ambition of 310 affordable homes a year, against an identified shortfall of 944 homes over ten years. Affordable housing policy, and a wider mix of house sizes and tenures, benefits households on low incomes, people on the housing list and homeless households.

Material deprivation. Local living and better walking, wheeling, cycling and public transport links reduce the cost of reaching work, school, food shops and healthcare for households without a car. Safeguarding and allocating employment land supports access to local jobs.

Area deprivation. LDP2 can prioritise brownfield and vacant and derelict land, town centre regeneration, open space quality and community infrastructure in these places, and can limit clustering of uses that harm health.

Communities of interest. Carers, single parents, care-experienced young people, disabled people and pensioners on low incomes benefit most from affordable, accessible homes close to services.

Potential negative impacts.

- Rural and smaller communities with poor public transport may not gain the benefits of local living.

How do you know that – what evidence and research have you used?

- Health and Wellbeing Background Paper: a 13-year gap in male life expectancy and an 11-year gap in female life expectancy between the least and most deprived areas.
- Revised Evidence Report and Gate Check decision (14 October 2026): housing land requirement of 10,825 homes; affordable need, supply and the 944-home gap.

- Topic Schedule 9, which sets out the Fairer Scotland Duty and the implication that LDP2 should reduce social, economic and health inequalities.

SECTION 6 – OTHER ASSESSMENT REQUIREMENTS [LINK].

Depending on the extent of any potential impact on Children's Rights, it may be necessary for you to complete a Child Rights and Wellbeing Impact Assessment See IIA Guidance for more information.

Response: Children's rights have been assessed in Section 4 and the impact is positive. A separate full Child Rights and Wellbeing Impact Assessment is not considered necessary at this stage. This will be re-screened once the Proposed Plan policies and sites are finalised, drawing on the Play Sufficiency Assessment.

Many of the disadvantages faced by equality groups includes poor health and health inequalities. Consider whether it is necessary to complete a Health Inequalities Impact Assessment.

Response: Health and health inequalities have been considered through the Health and Wellbeing Background Paper (August 2024), Topic Schedule 9 and the Healthcare Infrastructure Audit.

The environment in which you live can have a significant impact on your life chances. Consider whether the proposal is likely to impact on the environment and whether it is necessary to complete a Strategic Environmental Assessment.

Response: Yes. LDP2 is a qualifying plan under the Environmental Assessment (Scotland) Act 2005. An SEA Scoping Report has been prepared and consulted on, and an Environmental Report will be published for consultation alongside the Proposed Plan. A Habitats Regulations Appraisal will also be carried out, and a Strategic Flood Risk Assessment forms Annex 3 of the Evidence Report.

SECTION 7 – ACTIONS TO ENABLE COMPLETION OF IIA [LINK].

If there is insufficient evidence for any of the above then agree actions in order to complete the IIA and reconvene the group.

List each action, the target completion date and the actioner:

- .Finalise the Participation Statement after consultation closes on 20 November 2026, building in the accessibility measures in Section 9. **Target:** for inclusion in the Development Plan Scheme 2027. **Actioner:** Development Planning.
- Agree with NHS Lothian Public Health whether a Health Inequalities Impact Assessment is needed, and re-screen for a Child Rights and Wellbeing Impact Assessment. **Target:** before publication of the Proposed Plan. **Actioner:** Development Planning.
- Update the IIA to reflect consultation responses on the Proposed Plan. **Target:** before submission for Examination. **Actioner:** Development Planning and Environment Manager.

SECTION 8 - CONSULTATION AND ENGAGEMENT [LINK].

It is a legal requirement to engage with communities and services users when assessing the impact of a proposal.

State which groups were involved in this process and describe their involvement.

Engagement on LDP2 began in 2023 and is recorded in Annex 1 of the Evidence Report (Record of Engagement). Groups involved to date:

- **General public:** ten "We Need to Talk About LDP2" drop-in events across West Lothian (October 2023); four online "How Good is Your Place" surveys; Citizens Panel "Your Place" survey (over 500 responses); formal engagement on draft topic schedules (January to February 2025, over 50 responses) and on updated topic schedules (April to May 2026).
- **Children and young people:** dedicated children's and young person's surveys (October 2023); Open Space and Play survey (June to October 2024, over 1,000 responses); school engagement (January 2025).
- **Disabled people:** a dedicated workshop through the West Lothian Disability Access Forum (February 2025).
- **Gypsy/Travellers:** engagement through the council's Travellers Forum and the Lothian Gypsy Traveller Forum.
- **Older people:** Senior People's Forum and Citizens Panel.
- **Community councils and community bodies:** West Lothian Joint Forum of Community Councils (August 2024, January 2025, March 2025); support for Local Place Plans (eight registered).
- **Key agencies, NHS Lothian, landowners and developers:** workshop and direct engagement; Call for Ideas (March to May 2025, 409 submissions).
- **Planned:** consultation on the draft Participation Statement (to 20 November 2026), followed by a 12-week consultation on the Proposed Plan with drop-in events, neighbour notification, copies in all libraries, social media, mailing list notification and officer attendance at group meetings.

Describe the results of the involvement and how you have taken this into account.

Engagement responses were used to prepare and then revise the Evidence Report, which sets out for each topic the views expressed and any areas of dispute. Main ways in which involvement has shaped the proposal:

- Following the first Gate Check, the housing land requirement was revised from 12,500 to 10,825 homes, with an uplift linked to affordable housing need.
- A Healthcare Infrastructure Audit (March 2026) was added to the evidence base after the first Gate Check, and joint work with NHS Lothian on healthcare capacity is continuing.
- Children's and young people's responses inform the Play Sufficiency Assessment and open space strategy that will underpin Proposed Plan policy.
- Evidence on accessible and older persons' housing led to the stated implication that LDP2 should ensure housing caters for a wide range of needs in both affordable and private developments.
- Progress on exploring negotiated stopping places for Gypsy/Travellers was noted at Gate Check, with further consideration of accommodation needs required.

SECTION 9 - MITIGATING ACTIONS [LINK].

If the proposal has a negative/adverse impact on a particular group/s, but is still to be implemented, please provide justification for this.
Note: If the proposal is unlawfully discriminatory under the Equality Act 2010 and/or is having a negative impact on poverty and socioeconomic disadvantage under the Fairer Scotland Duty, you MUST identify, how the proposal can be amended or justified so the Council acts lawfully.

How could you modify the proposal to eliminate discrimination or to reduce any identified negative impacts? If necessary, consider other ways in which you could meet the aims and objectives.

No unlawful discrimination and no adverse impact under the Fairer Scotland Duty has been identified.

How could you modify the proposal to create or maximise the positive aspects of the proposals and to increase equality and reduce poverty and socioeconomic disadvantage.

- Maximise affordable housing delivery within what is viable, with a mix that reflects need (family homes, smaller homes, accessible homes).
- Require inclusive, accessible play provision and protect valued informal play space.
- Use health evidence to shape policy on healthy food environments, green space and air quality.
- Support communities in more deprived areas to prepare Local Place Plans.

Describe any modifications which you can make without further delay (for example, easy, few resource implications).

- Publish the Proposed Plan with a plain-English summary, and offer large print, easy read, BSL and translated versions on request.
- Use accessible venues on public transport routes, hold events at a mix of daytime and evening times, and avoid dates of religious observance.
- Notify the Disability Access Forum, Senior People's Forum, Travellers Forum, Lothian Gypsy Traveller Forum, schools and youth groups directly, and offer to attend their meetings.
- Provide a child-friendly summary and schools material for the Proposed Plan consultation.
- Carry out equalities monitoring of consultation respondents on a voluntary basis.
-

If you propose to make any of the modifications shown above, describe any potential new negative impacts on other groups in society or on the ability to achieve the aims and how you will minimise these.

No new negative impacts on other groups are expected. Two tensions will need to be managed:

- Higher requirements for affordable, accessible and specialist housing and for infrastructure contributions affect development viability and could slow delivery in lower-value areas. This will be tested through viability evidence and applied flexibly where justified.
- Directing development to accessible, brownfield and regeneration locations may conflict with landowner and developer preferences elsewhere. This is addressed through transparent site appraisal and the Examination process.

Please describe the resource implications of any proposed modifications taking into account financial, people and property issues.

- **Financial:** costs of accessible formats, translation, venue hire and targeted engagement are modest and expected to be met from the existing LDP2 budget.
- **People:** officer time from Development Planning for targeted engagement and for updating the IIA, with input from Housing, Education, the Anti-Poverty Service, the equality lead and NHS Lothian.
- **Property:** no direct implications. Any council-owned sites proposed in the plan will be subject to separate decisions.

Please list mitigating actions:

- Gypsy/Traveller policy and further engagement on accommodation needs.

- Accessible, wheelchair-accessible and older persons' housing requirements across tenures.
- Infrastructure-first phasing for schools and healthcare through the Delivery Programme.
- Accessible and inclusive Proposed Plan consultation, with equalities monitoring.
- IIA reviewed at each stage of plan preparation.

SECTION 10 - MONITORING AND REVIEW [LINK].

Please state how implementation and impact of the proposal be monitored, including implementation of any amendments. What type of monitoring will there be? How frequent?

Details on monitoring and reviewing impacts and mitigating actions:

- **IIA review:** this IIA will be reviewed after the Proposed Plan consultation, before submission for Examination, and at adoption. A review will take place no later than 12 months from the date of this assessment.
- **Engagement monitoring:** participation in the Proposed Plan consultation will be recorded by group and reported in the Statement of Conformity with the Participation Statement and in the annual Development Plan Scheme.
- **Delivery Programme:** to be published with the plan and reviewed at least every two years, tracking delivery of infrastructure including schools, healthcare, open space and play.
- **Housing Land Audit (annual):** completions by tenure, including affordable homes and, where data allows, wheelchair-accessible and specialist homes.
- **Corporate reporting:** relevant indicators reported through the Planning Performance Framework, Local Housing Strategy and Strategic Housing Investment Plan monitoring, the Local Child Poverty Action Report and Equality Mainstreaming reports.
- **Responsibility:** Development Planning and Environment Manager, reporting to the relevant Policy Development and Scrutiny Panel and Council Executive or full council as required.

SECTION 11 – RECOMMENDATIONS [LINK].

It is recommended that the proposal is (Please tick one of the actions below):

• Implemented with no amendments;	
• Implemented taking account of mitigating actions (as outlined above); or	**X**
• Rejected due to disproportionate impact on equality, poverty and socioeconomic disadvantage, human rights and children's rights.	

Reason for Recommendation:

The assessment finds that LDP2 is expected to have a predominantly positive impact on people with protected characteristics, on children's rights and on people experiencing socio-economic disadvantage, particularly through affordable and accessible housing, local living, play and open space, and infrastructure aligned with growth. No unlawful discrimination and no disproportionate adverse impact has been identified, and any interference with qualified human rights is lawful, pursues a legitimate aim and is proportionate.

A number of risks have been identified, mainly for Gypsy/Travellers, disabled people, older people, children and the most deprived communities. It is therefore recommended

that LDP2 proceeds taking account of the mitigating actions in Section 9 and the actions in Section 7, and that this IIA is kept under review as the plan progresses.

SECTION 12 – APPROVAL [LINK].	
Signed by Lead Officer:	Kate Hopper
Designation:	Development Planning and Environment Manager
Date:	19/11/2026
Counter Signature (Head of Service or Depute Chief Executive responsible for the proposal):	Craig McCorriston
Date:	19/11/2026

The completed IIA must be published on the Council's website [HERE] once the decision to implement has been agreed.

A link to the completed IIA must be included in 'Background References' section of relevant committee/management reports.