



West Lothian
Council

Council Executive

West Lothian Civic Centre
Howden South Road
LIVINGSTON
EH54 6FF

10 April 2014

A meeting of the **Council Executive** of West Lothian Council will be held within the **Council Chambers, West Lothian Civic Centre** on **Tuesday 15 April 2014** at **10:00am**.

For Chief Executive

BUSINESS

Public Session

1. Apologies for Absence
2. Order of Business, including notice of urgent business
3. Declarations of Interest - Members should declare any financial and non-financial interests they have in the items of business for consideration at the meeting, identifying the relevant agenda item and the nature of their interest.
4. Confirm Draft Minutes of Meeting of Council Executive held on 18 March 2014 (herewith).

Public Items for Decision

5. Twinning - Invitation to Visit Hochsauerlandkreis in 2014 - Report by Chief Executive (herewith)
6. 5th General Review of Local Government Electoral Arrangements - Proposal on Council Size - Report by Chief Executive (herewith)
7. General Services Capital Block Budget Allocations - Report by Head of Finance and Estates (herewith)

8. Chancellor's Budget 2014 - Report by Head of Finance and Estates (herewith)
9. Land at Alderstone Road, Livingston - Proposed Sale of 0.49ha to Lidl UK GMBH and Relinquishment of Rights over Adjoining Land - Report by Head of Finance and Estates (herewith)
10. 0.72ha Land at Hardie Road, Deans, Livingston - Proposed Sale to Jason Craig Daly - Report by Head of Finance and Estates (herewith)
11. Support to Credit Unions in West Lothian - Joint Report by Head of Finance and Estates and Head of Area Services (herewith)
12. East of Scotland Investment Fund - Report by Head of Planning and Economic Services (herewith)
13. Linlithgow 3rd Generation Synthetic Pitch Project - Report by Head of Area Services (herewith)
14. Scottish Government Consultation - Carers Legislation - Consultation on Proposals - Report by Head of Social Policy
15. Medication Policy - Social Policy - Report by Head of Social Policy (herewith)
16. 1,000 New Build Council Houses Programme - Report by Head of Housing, Construction and Building Services (herewith)
17. Housing Allocation Policy Review - Report by Head of Housing, Construction and Building Services (herewith)
18. Consultation on the Local Fire and Rescue Plan for West Lothian 2014-17 - Report by Head of Housing, Construction and Building Services (herewith)
19. West Lothian Local Policing Plan 2014-17 - Report by Head of Housing, Construction and Building Services (herewith)
20. Villages Improvement Fund Update - Report by Head of Planning and Economic Development (herewith)
21. SESPlan Supplementary Guidance for Housing - Report by Head of Planning and Economic Development (herewith)
22. Pentland Hills Regional Park - A Proposal to Extend the Regional Park Boundary - Report by Head of Planning and Economic Development (herewith)
23. Pest Control - Service Review - Report by Head of Planning and Economic Development (herewith)
24. Proposed Response to the Scottish Government Consultation on the

DATA LABEL: Public

Scottish Regulator Strategic Code of Practice - Report by Head of Planning and Economic Development (herewith)

25. Authorisation of Enforcement Staff - Environmental Health & Trading Standards - Report by Head of Planning and Economic Development (herewith)

Public Items for Information

26. West Lothian Community Health and Care Partnership - Report by Depute Chief Executive, Community Health & Care Partnership (herewith)
27. St John's Hospital Stakeholder Group - Report by Depute Chief Executive, Community Health and Care Partnership (herewith)
28. Action taken under Standing Order 31 (Urgent Business) - Note approval provided to commence the tendering procedure for the procurement of a 1 year framework agreement for the provision of local bus services as outlined in the Head of Finance and Estates (herewith)

NOTE **For further information please contact Val Johnston, Tel No.01506 281604 or email val.johnston@westlothian.gov.uk**

MINUTE of MEETING of the COUNCIL EXECUTIVE of WEST LoTHIAN COUNCIL held within COUNCIL CHAMBERS, WEST LoTHIAN CIVIC CENTRE, on 18 MARCH 2014.

Present – Councillors John McGinty (Chair), Cathy Muldoon, Frank Anderson, Tom Conn, Jim Dixon, Lawrence Fitzpatrick, Carl John (substituting for Peter Johnston), Dave King, Danny Logue, Anne McMillan, Angela Moohan and George Paul

Apologies – Councillor Peter Johnston

1. DECLARATIONS OF INTEREST

Agenda Item 16 (Steps N2 Work Resource Allocation) – Councillor Muldoon declared a non-financial interest in that her son was employed by the council as part of the graduate work experience programme;

Agenda Item 16 (Steps N2 Work Resource Allocation) – Councillor McMillan declared a non-financial interest in that her nephew was employed by the council as part of the graduate work experience programme; and

Agenda Item 6 (West Lothian Response regarding Health Inequalities and Early Years) – Councillor Logue declared a non-financial interest in that he was an NHS Lothian employee.

2. MINUTE

The Council Executive approved the Minute of its meeting held on 4 March 2014 as a correct record. The Minute was thereafter signed by the Chair.

3. MARY, QUEEN OF SCOTS STATUE

The Council Executive considered a report (copies of which had been circulated) by the Chief Executive concerning a request from the Marie Stuart Society to contribute to the costs of a project to erect a statue of Mary, Queen of Scots at Linlithgow Palace

The Chief Executive advised that the Marie Stuart Society was an international history society founded in Scotland in 1992 and was dedicated to the study of the life and times of Mary, Queen of Scots.

The society was embarking on a project to erect a statue to the Queen at the place of her birth at Linlithgow Palace. The Society was working in partnership with Historic Scotland who was supporting the plans. Historic Scotland had also donated a site beside the palace for a statue and was paying for the foundations, the upkeep and maintenance.

A copy of the request from the Marie Stuart Society was attached to the

report at Appendix A and the project was estimated to cost £80,000.

It was also noted that there was a statue of Mary, Queen of Scots located within the gardens of Annet House in Linlithgow.

Decision

Unanimously agreed to donate £1,000 to the Marie Stuart Society to contribute towards the erection of a statue of Mary, Queen of Scots.

4. WEST LOTHIAN REPOSE TO CALL FOR EVIDENCE FROM THE SCOTTISH PARLIAMENT HEALTH AND SPORT COMMITTEE REGARDING HEALTH INEQUALITIES AND EARLY YEARS

The Council Executive considered a report (copies of which had been circulated) by the Head of Social Policy seeking approval of a response to the call for evidence from the Scottish Parliament Health and Sport Committee regarding health inequalities and early years.

The report provided a summary of the questions that were being posed by the Health and Sport Committee and a proposed response was attached to the report at Appendix A.

The Council Executive was invited to approve the response for submission to the Scottish Parliament Health and Sport Committee.

Decision

To approve the terms of the report.

5. WEST LOTHIAN REPOSE TO CALL FOR INFORMATION FROM THE EQUAL OPPORTUNITIES COMMITTEE ON FATHERS AND PARENTING

The Council Executive considered a report (copies of which had been circulated) by the Head of Social Policy seeking approval of a response to the call for information from the Equal Opportunities Committee on Fathers and Parenting.

The Head of Social Policy explained that the Equal Opportunities Committee was keen to hear about the experiences of single fathers and fathers with shared residence of children, identifying the key challenges they faced in day-to-day life and the quality of support available.

The Equal Opportunities Committee was also keen to hear from statutory services and organisations that provided support to single fathers. Areas of interest included :-

- The provision of services and support groups;
- Societal attitudes towards lone/unmarried fathers; and
- Issues around parental responsibilities and rights for fathers.

Attached to the report at Appendix A was a proposed response and the Council Executive was invited to approve the response for submission to the Equal Opportunities Committee on Fathers and Parenting.

Decision

To approve the terms of the report.

6. SELF-DIRECTED SUPPORT UPDATE

The Council Executive considered a report (copies of which had been circulated) by the Head of Social Policy providing an update on progress being made to prepare for the introduction of the Social Care (Self-Directed Support) (Scotland) Act 2013 and the actions being taken to ensure compliance with the legislation when it came into force on 1 April 2014.

The Head of Social Policy explained that Self Directed Support (SDS) was the term that described the ways in which individuals and families could have informed choice about the way support was provided to them. The aim was to achieve improvements in the outcomes people could achieve by giving them greater choice and control over how their support needs were met and by whom.

The wider policy aims were to ensure that services and support became more flexible and responsive to meets people's needs and outcomes and to drive a cultural shift around the delivery of support that viewed people as equal citizens with rights and responsibilities rather than simply passive recipients of services.

The Social Care (Self Directed Support) (Scotland) Act 2013 would come into force on 1 April 2014 and therefore Local Authorities would be under a legal requirements to ensure that options for Self-Directed Support and the associated duties detailed in the Act were part of the assessment and review processes for every service user. The report provided a summary of the duties of the Act. Further details of the options which the local authority must offer in accordance with the Act were also summarised in the report.

The Head of Social Policy continued to explain that West Lothian recognised that Self-Directed Support could not be delivered in isolation but must take account of the wider public services landscape, including early intervention and prevention, working in partnership to maximise the use of available resources, building community capacity and developing

the market. Therefore West Lothian had chosen to implement the Self-Directed Support within a context of personalisation and outcome focussed support and the project had been developed to meet six objectives, details of which were outlined in the report.

The report concluded that the introduction of the Social Care (Self-Directed Support) Act on the 1 April 2014 would afford eligible service users with greater involvement and choice in relation to their assessment and the provision of support and services and that the introduction of new legislation placed statutory duties on the council with good progress being made to ensure that the council was ready by 1 April 2014.

It was recommended that the Council Executive :-

- Review the progress which was being made to deliver solutions to achieve the six key objectives for the implementation of the Self-Directed Support in West Lothian;
- Approve the budget and resource allocation arrangements proposed which had been designed with the objective that care and support needs could be provided to all eligible service users within available resources; and
- Note that an update report on the provisions being made under each of the Self-Directed Support options would be prepared for the Social Policy Policy Development Scrutiny Panel meeting in August 2014, when the Statutory Guidance, to be published on 1 April 2014, had been given further consideration.

Decision

To approve the terms of the report.

7. SCHEME OF ELECTED MEMBERS REMUNERATION, ALLOWANCES AND REIMBURSEMENT OF EXPENSES

The Council Executive considered a report (copies of which had been circulated) by the Head of Corporate Services seeking approval for the adoption of a Scheme of Elected Members Remuneration, Allowances and Reimbursement of Expenses for 2014-15.

The Head of Corporate Services advised that the council's Code of Corporate Governance required the Scheme of Elected Members Remuneration, Allowances and Reimbursement of Expenses (the Scheme) to be reviewed annually by committee.

The Scheme was based on the Local Government (Scotland) Act 2004 (Remuneration) Regulations and Amendment Regulations 2008 and the Local Government (Allowances and Expenses) (Scotland) Regulations 2007 and Amendment Regulations 2010, 2011 and 2013.

With regards to 2014-15 pay levels these were set by the Scottish Government and in accordance with the Local Government (Scotland) Act 2004 (Remuneration) Amendment Regulations 2013 which had recently come into force included a pay increase of 1% to basic levels from 1 April 2014.

With regards to the 2014-15 Scheme, a copy of which was attached to the report at Appendix 1, this had been updated to reflect the removal of the provisions that existed to remunerate conveners and vice-conveners of joint boards responsible for police and fire and rescue matters. In addition the claims procedure and guidance note contained in the scheme attached to the report at Appendix 1 had been updated to reflect the provision and use of iPads.

It was recommended that the Council Executive adopt the revised Scheme of Elected Members Remunerations, Allowances and Reimbursement of Expenses for 2014-15 as set out in Appendix 1 attached to the report.

Decision

To approve the terms of the report.

8. LOTHIAN BUSES - REGIONAL SUBCOMMITTEE MEMBERSHIP

The Council Executive considered a report (copies of which had been circulated) by the Head of Operational Services seeking approval to appoint representatives to the Lothian Buses Limited Regional Subcommittee.

The Head of Operational Services advised that the Council Executive had already approved a report authorising the council's Chief Solicitor to enter into a Minority Shareholder Agreement with Transport for Edinburgh Limited, Lothian Buses, The City of Edinburgh Council and the minority shareholders of Lothian Buses (East Lothian, West Lothian and Midlothian Councils).

The requirement to set up a Regional Subcommittee was a specific part of the Minority Shareholders Agreement as summarised in the report. In terms of the Minority Shareholder Agreement each minority shareholder was able to appoint at least one representative. Discussions had been held with representatives of other minority shareholders regarding the appropriate representation and accordingly it was proposed that each minority shareholder appoints an elected member.

It was recommended that the Council Executive :-

- Nominate the Executive Councillor for Development and Transportation and the Head of Operational Services to the Lothian Buses Limited Regional Subcommittee;

- Agree that the Vice Chair of the Development and Transport Policy Development and Scrutiny Panel and the council's Public Transport Manager were nominated deputies; and
- Requests that regular reports on the outcomes of the Regional Subcommittee and main Board meetings were submitted to the Development and Transport Policy Development Scrutiny Panel for their information.

Decision

To approve the terms of the report

9. CORPORATE COUNTER FRAUD ARRANGEMENTS

The Council Executive considered a report (copies of which had been circulated) by the Head of Finance and Estates advising of current best practice in relation to protecting the council's resources against the risk of fraud and to advise of proposed revisions to the council's corporate counter fraud arrangements.

The Head of Finance and Estates advised that the next few years would see significant reform within the welfare system with income related working age benefits and tax benefits being replaced by a Universal Credit and the introduction of the Department of Work and Pensions (DWP) Single Fraud Investigation Services (SFIS). Therefore with the impending transfer of responsibility for investigation of social security benefits to SFIS this provided the opportunity for the council to review its approach to investigating fraud across all areas of the council's services and to redeploy staff currently working in benefits fraud investigation to corporate counter fraud work.

The council had already invested in a counter fraud service resource for Housing Benefit purposes and it was proposed that this specialist investigative resource be transferred to the Audit and Risk Management Unit from April 2014, initially on a temporary basis for 2014-15. This would allow a more proactive approach in relation to tackling the risks of corporate fraud in areas including prevention, detection and investigation.

The counter fraud resources within the Revenues Unit were partly funded by DWP's administration subsidy paid to the council. The future amount of funding was set to be confirmed and would influence the scope of the counter fraud operation within the council. Additionally the DWP had confirmed that additional funding was to be made available to local authorities through the Scottish Government for non-benefit counter fraud work. However the overall amount of funding and the council's share of this had yet to be confirmed.

It was recommended that the Council Executive :-

- Approve the move of the counter fraud team to the Audit and Risk Management Unit as set out in the report;
- Approve the action plan attached to the report as an appendix; and
- Agree that the Audit and Governance Committee be advised of this report and be updated on progress against the action plan.

Decision

To approve the terms of the report

10. PROCUREMENT ARRANGEMENTS - PROVISION OF LOCAL BUS SERVICES

The Council Executive considered a report (copies of which had been circulated) by the Head of Finance and Estates seeking approval to commence tendering procedures for the procurement of a one year framework agreement, with an anticipated start date of 1 October 2014, with a possible three year extension for a council-wide local bus service.

The Head of Finance and Estates explained that the services being tendered, as detailed in Appendix 1 attached to the report, were a direct replacement of current council local bus which were due to expire on 30 September 2014. The tender represented an interim contract to allow for the re-aligning of all council wide local bus services so that they ended within the same timescales.

The Head of Finance and Estates further explained that historically the council had awarded passenger transport contracts on a “minimum subsidy” basis, whereby the council paid a fixed amount per month to the contractor and the contractor retained any fares revenue taken. However in this instance tenderers would be invited to submit bids on a “minimum cost” basis (whereby the tender price was the price required to operate the service and all fare revenues were submitted to the council) as well as the traditional minimum subsidy basis. This strategy had been used in previous tenders and had proven beneficial in delivering savings to the council.

The report continued to provide information on in-house capabilities, procurement issues, sustainability considerations and budget implications.

It was recommended that Council Executive approve :-

- The use of the Open Procedure whereby all suppliers expressing an interest in the council wide local bus services contract would be invited to tender; and
- The award criteria set out in the report.

Decision

To approve the terms of the report

11. DATA CENTRE, CAIRD STREET, HAMILTON - LICENCE OF USE OF SPACE FOR DISASTER RECOVERY OF IT SERVICES

The Council Executive considered a report (copies of which had been circulated) by the Head of Finance and Estates seeking approval to enter into a licence agreement with South Lanarkshire Council and to delegate powers to the Head of Finance and Estates to conclude negotiations in relation to a licence to access space within a shared data centre for the purpose of disaster recovery of IT Systems.

The Head of Finance and Estates advised that the council's existing agreement in relation to use of space for IT disaster recovery services terminated on 31 March 2014. Therefore it was imperative that a new agreement was in place from 1 April 2014 to ensure continuity in the event of any failure requiring recovery.

The proposed licence would commence on 1 April 2014 and expire on 31 March 2017. The council would have an option to renew the licence for two further periods of one year, beyond 31 March 2017. The main terms and conditions of the licence were summarised in the report.

It was recommended that the Council Executive :-

1. Approve the council entering into a licence agreement with South Lanarkshire Council for a period of three years, with an option to renew the licence for two further periods of one year, for the purpose outlined in the report, at an initial licence fee of £80,850 per annum (exclusive of VAT); and
2. Grant delegated powers in this instance to the Head of Finance and Estates to conclude negotiations and formalise the licence agreement.

Decision

To approve the terms of the report.

12. 3 YOUNGS ROAD, EAST MAINS INDUSTRIAL ESTATES, BROXBURN - PROPOSED LEASE TO GORDON BOW PLANT HIRE LTD

The Council Executive considered a report (copies of which had been circulated) by the Head of Finance and Estates seeking approval for a lease of 3 Youngs Road, East Mains Industrial Estate, Broxburn to

Gordon Bow Plant Hire Ltd.

The Head of Finance and Estates advised that 3 Youngs Road was a serviced yard extending approximately an acre in size and could be used for storage and distribution services. The property had recently been marketed for a number of weeks with an offer received from Gordon Bow Plant Hire Ltd by the closing date.

Gordon Bow Plant Hire Ltd was a highly successful local company established in 1981 specialising in the hire of plant machinery, structural engineering and blacksmith work. The business currently employed 140 staff and was seeking to expand their operations in East Mains Industrial Estates. Their existing site was full to capacity and in order to expand they required additional storage space.

The proposed new lease would provide the council with certainty of income at 3 Youngs Road through to 2019 and potentially through to the lease end in 2024. The main terms and conditions were outlined in the report.

It was recommended that the Council Executive approve a ten year lease of the one acre yard at 3 Youngs Road, East Mains Industrial Estate, Broxburn to Gordon Bow Plant Hire Ltd at an initial rental of £13,000 per annum.

Decision

To approve the terms of the report.

13. LAND AT WEST CALDER HIGH SCHOOL - PROPOSED GRANT OF SERVITUDE RIGHT TO SCHRODERS PROPERTY UNIT TRUST

The Council Executive considered a report (copies of which had been circulated) by the Head of Finance and Estates seeking approval to enter into a servitude agreement with Schrodgers Property Unit Trust to allow them access for a proposed residential development.

The Head of Finance and Estates explained that Schrodgers Property Unit Trust (SPUT) owned the majority of the Brucefield Industrial Estate, West Calder including the fields laying between the industrial estate and West Calder High School that were bounded by the railway line to the south and the tree belt fronting the A71 to the north. The tree belt was owned by The Woodland Trust.

SPUT proposed to develop the fields and had submitted a planning application for 180 residential units that the council was minded to grant with negotiations over the Section 75 agreement nearing completion. As part of the legal agreement, SPUT would, amongst other things, transfer land for affordable housing and land specifically for a proposed school extension. In order to make their development commercially viable, SPUT required access to the A71. Therefore SPUT had approached the council

with a view to agreeing a right of servitude across council land that would allow them and their successors in title, access to their site off the A71 via a shared access to the school.

In order to facilitate the proposed shared access, it was likely that a separate egress from the school would be required which may in turn necessitate the relocation of the bus stop/by-pass on the A71 that lay adjacent to the proposed egress. In creating the egress, it was considered that there would be an opportunity to upgrade and extend the school bus parking provision.

Following negotiations with SPUT it had been provisionally agreed that the council would grant SPUT a servitude right of access and egress over council land to allow access for the housing development. The granting of the servitude would be linked to requirements in relation to the construction of the enabling works. In return for being granted the servitude, SPUT would pay the council the sum of £625,000 of which approximately £260,000 could be required to pay for the enabling work for the new access.

It was recommended that the Council Executive :-

- Approve the granting of servitude rights to Schroder Property Unit Trust, the owners of the land adjacent to West Calder High School, for the sum of £625,000 subject to the terms and conditions outlined in the report;
- Agree to the council managing certain enabling works, as required, in connection with the granting of the servitude, the estimated costs of which were £260,000; and
- Authorise the Head of Finance and Estates to instruct the council's Chief Solicitor to enter into the aforementioned agreement on behalf of the council, on the basis that the terms and conditions outlined on the report represented the best outcome for the council.

Decision

To approve the terms of the report

14. STEPS N2 WORK RESOURCE ALLOCATION

The Council Executive considered a report (copies of which had been circulated) by the Head of Area Services providing an overview of the performance of the Steps N2 Work programme and detailing how the programme could be enhanced in 2014-15.

The Head of Area Services provided a summary of the various work streams that were being undertaken by the council to create additional

opportunities for young people to help address some of the employability challenges faced by this particular client group and included the Wage Subsidy Programme, West Lothian Jobs Fun, Modern Apprentices (Non Trade) and the Graduate Work Experience Programme details of which were summarised in a table within the report. It was noted that with the exception of the Voluntary Sector Wage Subsidy programme all elements of the programme had exceeded their targets.

The Voluntary Sector Wage Subsidy programme had proved challenging to deliver in terms of the uptake of places within the sector and feedback to date had indicated that organisations did not have the match funding for the positions. To address this issue it was recommended that £50,000 was diverted from the Voluntary Sector Wage Subsidy programme to the Social Economy Network for 2014-15.

The Head of Area Services continued to explain that officers had undertaken an evaluation of the Graduate Work Experience Programme after the creation of the 12 pilot places and number of positive points had been highlighted by the focus group which were summarised in the report. The possible improvements highlighted included (a) all opportunities to start around the same time and (b) the possibility of spending some time in other similar services. Therefore given the feedback it was proposed that the Steps N2 Work continue the Graduate Experience opportunities in 2014-15. Also given the uptake of the Voluntary Sector wage subsidy opportunities previously highlighted it was being recommended that £100,000 was made available from this area of the programme to create 12 places in the graduate work experience programme in 2014-15

It was further reported that the budget for the Voluntary Sector Wage Subsidy programme was £270,000 until March 2018 and that £36,000 had been committed up to February 2014. If the recommendations contained within the report were approved then the remaining spend for the Voluntary Sector Wage Subsidy Programme would be £84,000.

It was recommended that the Council Executive note the performance of the Steps N2 Work programme and approve the following :-

- £50,000 was diverted from the Voluntary Sector Wage Subsidy programme to the Social Enterprise Network to build the capacity of the sector to provide substantive employment for young people in future years; and
- £100,000 was diverted from the Voluntary Sector Wage Subsidy programme to create 12 Graduate Work Experience places in 2014-15

Decision

To approve the terms of the report.

15. WEST Lothian ANTI POVERTY STRATEGY 2014-2017

The Council Executive considered a report (copies of which had been circulated) by the Head of Area Services presenting the revised West Lothian Anti Poverty Strategy 2014-2017, a copy of which was attached to the report.

The revised strategy reflected the decision of the Council Executive on 29 October 2013 that the strategy be revised to include the actions in the council's welfare reform action plan, to outline actions to promote financial and digital inclusion amongst people in West Lothian in and at risk of poverty and to reflect growing concerns around in-work poverty.

The report provided the following appendices:-

Appendix 1	The revised Draft West Lothian Anti Poverty Strategy 2014-2017
Appendix 2	Anti Poverty Strategy: Proposed Governance: Terms of Reference and Membership
Appendix 3	Anti Poverty Strategy Action Plan 2013-2014
Appendix 4	Welfare Reform Action Plan
Appendix 5	Draft Anti Poverty Strategy Communication Plan 2014/17

The Council Executive was informed that the implementation of the strategy was dependent on good communication with all partners and the public.

The Head of Area Services concluded that the revised West Lothian Anti Poverty Strategy outlined the response of West Lothian Community Planning Partnership to reducing and alleviating poverty in West Lothian. The revised strategy:

- Allowed closer cooperation among local community planning partners.
- Incorporated the work being done within West Lothian Council on the local responses to welfare reforms.
- Recognised that poverty could be alleviated by helping people at risk of poverty become better financially and digitally included.

It was recommended that the Council Executive accepted the report and agreed to adopt the strategy as council policy.

Decision

To approve the terms of the report.

16. HOME ENERGY EFFICIENCY PROGRAMME FOR SCOTLAND (HEEP)

The Council Executive considered a report (copies of which had been circulated) by the Head of Housing, Construction and Building Services advising of available funding to West Lothian that would be used for insulation and other energy efficiency projects which would help with carbon savings and potentially reduce fuel poverty in private sector houses.

The Head of Housing, Construction and Building Services explained that in April 2013 the council had made a successful bid to the new Home Energy Efficiency Programmes for Scotland (HEEPS):Area Based Schemes (ABS) and had been awarded £1.13m. In addition the council had recently been awarded a further £1.082m for 2014/15. This funding remained conditional on being able to lever-in funding from the Energy Company Obligation (ECO).

Since April 2013 the council had engaged with Changeworks, a local environmental charity and social enterprise company, to prepare submissions for West Lothian and establish in general terms what work could be carried out on private sector housing. Work would focus on areas including Broxburn, Bathgate, Armadale, Whitburn, Fauldhouse and Livingston South and 400+ potential addresses had been identified in these areas.

On behalf of the council and as part of a consortium of local authorities Changeworks had prepared a tendering exercise based on experience and quality to identify suitable companies to carry out the works in West Lothian for the 2013-14 programme. Seven companies had been invited to tender for this work. Tenders were to be returned by 17 March 2014

In addition Almond Housing Association in Livingston had identified an area in Howden where the housing stock was of a “no-fines” construction and was of relatively poor levels of thermal insulation. Almond Housing Association envisaged that available funding would support work to around about 138 private houses however to ensure that the project was successful they were seeking £7,500 per private house from the HEEPS:ABS fund administered by the council.

The Head of Housing, Construction and Building Services continued to explain that an opportunity had also arisen for the HEEPS:ABS money to fund a feasibility study into the opportunity of introducing a gas supply into the community of Westfield. This was one of the few remaining areas of West Lothian which did not have a mains gas supply and to date had always been deemed too expensive to provide. It was proposed that the council should proceed with the study through Scottish Gas Networks and report back on the feasibility study. The study was expected to cost in the

region of £17,380.

The Head of Housing, Construction and Building Services concluded that there were significant opportunities offered by the HEEPS:ABS funding, primarily for private housing, and that from a council perspective it was better to be involved in the process, particularly in setting the strategic direction and in due course the council would have to carry out quality control checks on any work undertaken.

The Council Executive was invited to :-

1. Note the awards of £1.13m for 2013-14 and £1.82m for 2014-15 for the West Lothian local authority area under the government's Home Energy Efficiency Programme for Scotland (HEEPS);
2. Agree that procurement arrangements should continue for 2013-14 projects with a view to committing all of the available funding to :-
 - a) Identified area based insulation projects in West Lothian primarily in areas set out in the original proposal (Broxburn, Bathgate, Armadale, Polbeth, Fauldhouse, Whitburn and Livingston South) with the projects to be delivered after the completion of a mini tendering exercise;
 - b) External wall insulation work in the Howden area of Livingston as part of the 2013-14 project established by Almond Housing Association; and
 - c) A feasibility study on the provision of a gas supply to the village of Westfield in West Lothian;
3. Agree that the council should remain part of the consortium of local authorities working to deliver HEEPS projects and that negotiations be started with Changeworks to seek to appoint them to continue to manage the project on behalf of West Lothian Council in 2014-15 on a similar basis on which they had managed the 2013-14 project. This would include preparation of the submission to the Scottish Government due on 11 April 2014; and
4. Agree that the council should review its approach to energy efficiency projects, given that substantial resources were likely to be available over the medium term for investment in energy efficiency measures and help address fuel poverty.

Decision

To approve the terms of the report.

17. HIGH HEDGES (SCOTLAND) ACT 2013 - ADDITION TO THE COUNCIL'S SCHEME OF DELEGATION AND FEE SETTING

The Council Executive considered a report (copies of which had been circulated) by Head of Planning and Economic advising of the introduction of new legislation aimed at controlling high hedges as contained within the High Hedges (Scotland) Act 2013 and which would come into effect on 1 April 2014.

The report explained that, on 1 April 2014, the High hedges (Scotland) Act 2013 would come into force. The legislation was intended to deal with problems of loss of light which a householder believed was caused by a hedge over two metres in height on land owned by a neighbour. It was intended to be used when discussions between the two parties had failed to bring about a resolution.

Under the legislation, a householder would be able to apply to the council to serve a High Hedge Notice on a neighbour whose hedge was affecting the daylight reaching his/her property. The process to be carried out by the Council on receiving such an application was outlined in the report.

The Council Executive was informed that changes to the Scheme of Delegation were required to allow the processing determination of applications for High hedge Notices.

Additionally, the Act required the council to set its own fee for the applications submitted in respect of high hedges. The fee for a small scale planning application was currently £382 and it was recommended that the fee for a High Hedges Notice application was set at this level. The fee should be raised in line with other rises in planning fees as set by the Scottish Government.

The Head of Planning and Economic Development concluded that the proposed changes to the Scheme of Delegation were required to allow the processing and determination of applications for High hedge Notices, and the proposed fee was required in order to ensure that there was no additional cost to the council in dealing with the new legislation.

It was recommended that the Council Executive:

- Note the terms of the new legislation as set out in the report;
- Not that the legislation was being enacted earlier than previously anticipated;
- Approve the proposed changes to the Scheme of Delegation with immediate effect; and
- Approve the proposed fee for processing a High Hedge Notice.

Decision

To approve the terms of the report

18. PLANNING BRIEF - WEST CALDER WORK SPACE, SOCIETY PLACE, WEST CALDER

The Council Executive considered a report (copies of which had been circulated) by the Head of Planning and Economic Development seeking approval of a planning brief for West Calder Workspace, West Calder, a copy of which was attached to the report at Appendix 1.

The Head of Planning and Economic Development explained that West Calder Workspace was currently vacant following a decision by the Council Executive on 13 November 2012 to agree the acquisition of a site at Dickson Street to re-locate the businesses from the Workspace.

The workspace comprised one large brick built building to the east and a former stable block of traditional construction to the west all within a courtyard setting. There was a single access from Society Place. The buildings were not listed or within a conservation area.

Following the decision by the Council Executive a planning brief was prepared which indicated how the council, as planning authority, expected the site to be developed. The development would be consistent with the West Lothian Local Plan and as far as could be determined there was sufficient infrastructure to cope with redevelopment. The proposed use for the property included residential development, offices, nursery or assembly and leisure uses including a dance hall or gym.

Local members had been consulted on the terms of the planning brief and no comments had been received. Consultation with West Calder and Harburn Community Council, adjacent proprietors, Network Rail and West Calder and Harburn Community Development Trust in addition to statutory stakeholder was also undertaken which resulted in four responses being received from local residents. The response raised no direct objections but concern was expressed over the uncertainty of the outcome of the redevelopment of the site.

The report concluded that the draft planning brief had been prepared for the site at West Calder Workspace and that reuse of the site would provide a suitable development opportunity within West Calder as well as avoiding the potential of the site slipping into disuse and dereliction.

It was recommended that the Council Executive approve the terms of the report and planning brief.

Decision

To approve the terms of the report.

19. CONFERENCE & COURSES - ATTENDANCE AT LEADER CONFERENCE

The Council Executive approved attendance at the undernoted conference as follows :-

Scottish LEADER Conference Councillor David Dodds
2014 – “Inspire – Be Inspired”
on 20 March 2014, Glasgow

20. PRIVATE SESSION

The Council Executive resolved under Section 50(A)(4) of the Local Government (Scotland) Act 1973, that the public be excluded from the meeting during consideration of the following item of business on the grounds that they involved the likely disclosure of exempt information as defined in paragraph 3 of Schedule 7A of the Act.

21. LAND AT NORTH STREET, ARMADALE

The Council Executive considered a report (copies of which had been circulated) by the Head of Finance and Estates advising of an opportunity that had arisen for the council to purchase Volunteer Park in North Street, Armadale and to seek approval for the acquisition of the property on the terms set out in the report.

The Head of Finance and Estates advised that the ownership of Volunteer Park currently rested with Armadale Thistle Football Club Ltd (ATFCL). ATFCL was dissolved as a trading company some years ago, leaving behind Volunteer Park as its sole asset. However the company had recently been restored to the Register of Companies by Jackson Carmichael Liquidators Ltd (JCLL). The liquidators role was to raise capital from the disposal of any assets held by the failed company and in this instance were seeking to raise funds using the security held over Volunteer Park

JCLL had indicated that once a legal process had completed, the outcome of which would result in them securing a clear title to Volunteer Park, they had confirmed a willingness to sell it directly to the council. The main terms of the proposed acquisition were outlined in the report.

It was recommended that the Council Executive :-

1. Approve the acquisition of Volunteer Park in North Street, Armadale on the terms set out in the report; and
2. Authorise the Head of Finance and Estates to finalise the negotiations with the sellers and instruct the council's Chief Solicitor to conclude the transaction.

Decision

1. To approve the terms of the report;

2. Agreed that once the acquisition was complete the Head of Finance and Estates engage with the all of the footballing fraternity in Armadale on the future use of the facilities.



West Lothian
Council

COUNCIL EXECUTIVE

TWINNING: INVITATION TO VISIT HOCHSAUERLANDKREIS IN 2014

REPORT BY CHIEF EXECUTIVE

A. PURPOSE OF REPORT

To inform Council Executive that an invitation has been received from the Landrat, Hochsauerlandkreis for an official delegation from West Lothian to visit Hochsauerland from Thursday 23 to Sunday 26 October 2014.

B. RECOMMENDATION

It is recommended that:

1. consideration be given to responding to the invitation; and
2. if the invitation is accepted, consideration to be given to:
 - The size of the delegation
 - The composition of the delegation
 - The names of individuals taking part be remitted to the Chief Executive in consultation with the Provost and Leader of the Council

C. SUMMARY OF IMPLICATIONS

I	Council Values	Being honest, open and accountable Working in partnership
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Continuation of the development of the twinning partnership between Hochsauerland and West Lothian
III	Implications for Scheme of Delegations to Officers	None
IV	Impact on performance and performance Indicators	None
V	Relevance to Single Outcome Agreement	None
VI	Resources - (Financial, Staffing and Property)	The proposed level of contribution can be delivered from the existing Chief Executive Office revenue budget.
VII	Consideration at PDSP	None

VIII Other consultations

West Lothian Twinning Association.

D. TERMS OF REPORT

The council has received an invitation from the Landrat, Hochsauerlandkreis, who is inviting an official delegation from West Lothian to visit Hochsauerland in 2014. In line with established practice, it is customary for the council to receive such an invitation every four years.

In 2010, there were 8 people in the delegation: 4 Councillors, 1 Official and 3 representatives of the West Lothian Twinning Association.

E. CONCLUSION

The Council Executive is invited to consider responding to the invitation and if accepted, to consider the arrangements for the visit as outlined at section B in the recommendations.

F. BACKGROUND REFERENCES

Letter from the Landrat of Hochsauerlandkreis, received by the Chief Executive Office

Appendices/Attachments: None.

Contact Person: Carrie Heron, Executive Project Officer, Chief Executive Office
carrie.heron@westlothian.gov.uk; 01506 281675

Graham Hope
Chief Executive

Date of meeting: 15 April 2014



West Lothian
Council

COUNCIL EXECUTIVE

**5TH GENERAL REVIEW OF LOCAL GOVERNMENT ELECTORAL ARRANGEMENTS –
PROPOSAL ON COUNCIL SIZE**

REPORT BY CHIEF EXECUTIVE

A PURPOSE OF REPORT

To inform the Council Executive of the Local Government Boundary Commission for Scotland's (LGBCS) proposals for councillor numbers, which is part of the 5th Review of Local Government Electoral Arrangements

B RECOMMENDATION

That the Council Executive agree a response to the LGBCS on their proposal to increase the number of councillors in West Lothian by one, from 33 to 34.

C SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; working in partnership
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Local Government (Scotland) Act 1973
III Implications for Scheme of Delegations to Officers	None
IV Impact on performance and performance Indicators	None
V Relevance to Single Outcome Agreement	None
VI Resources - (Financial, Staffing and Property)	Additional councillors would incur additional costs in remuneration, optional membership of LGPS and reimbursement of expenses in carrying out official council business
VII Consideration at PDSP	Special Partnership and Resources PDSP on 14 th April 2014.
VIII Other consultations	None

D TERMS OF REPORT

D1 Background

The Local Government Boundary Commission for Scotland (LGBCS) has started their 5th General Review of local government electoral arrangements in Scotland. The review starts with recommendations being made for the number of councillors on each council, and will go on to review the number and boundaries of wards for the election of these councillors. They aim to report on this review by 2016 so that the resulting wards are available for the local government elections in Scotland which are planned for 2017.

D2 Number of Councillors

The LGBCS is proposing that the number of councillors in West Lothian increase from 33 to 34.

D3 Methodology

The proposal is based on a methodology that takes account of population distribution and levels of deprivation. The methodology provides 5 categories into which a council can fall. Each category has different ratio of electors to councillors.

Category	Criteria	Ratio
1	Less than 30% of the population living out-with settlements of 3000 or more AND 30% or more of the population living in the most deprived areas	2800
2	Less than 30% of the population living out-with settlements of 3000 or more AND 15% to 30% of the population living in the most deprived areas	3000
3	Less than 30% of the population living out-with settlements of 3000 or more AND less than 15% of the population living in the most deprived areas	3800
4	30% to 60% of the population living out-with settlements of 3000 or more AND less than 15% of the population living in the most deprived areas	2800
5	60% or more of the population living out-with settlements of 3000 or more AND less than 15% of the population living in the most deprived areas	800

Population density has been calculated using the mid-year population estimates from the National Records of Scotland and dry land area data from the Office for National Statistics. Previously the percentage of the population living out with settlements of 10000 was used, and the move to the percentage of the population living out with settlements of 3000 is to mirror the urban-rural classification used by the Scottish Government.

The Scottish Index of Multiple Deprivation (SIMD) has been used to assess deprivation. SIMD provides weighted scores based on seven different dimensions of deprivation (employment, income, access, crime, housing, health and education). This is the first time that deprivation has been included in the criteria for determining council size, and it is because the LGBCS believe that it is a reasonable indicator for a range of factors that impact on council services and the work of councillors.

For this review the minimum number of councillors determined as necessary for effective administration remains unchanged, but the maximum has increased from 80 to 85. The total number of councillors for any council will also not increase or decrease by more than 10%. The ratios determined for each of the categories ensures as far as possible that these conditions are met automatically, although this was not possible for all local authorities.

West Lothian is in Category 3, with less than 30% of the population living out-with settlements of 3000 or more AND less than 15% of the population living in the most deprived areas

With a total electorate of just over 130,000 as at September 2013, dividing the electorate by the number of electors per councillor for category 3 authorities of 3800, gives 34 councillors.

D4 Consultation Period

The LGBCS is consulting with councils on their recommendations on council size before carrying out a public consultation. The consultation with councils is for a statutory period of 2 months and all comments should be submitted by 23 April 2014

D5 Next Stages

The expected timetable for the review is:

Stage	Start	End
Consultation with councils on council size	Feb 14	April 14
Public consultation on council size	May 14	Aug 14
LGBCS considers responses and agrees council size	Sep 14	Dec 14
LGBCS develops proposals on ward boundaries	Sep 14	Dec 14
Consultation with councils on ward boundaries	Jan 15	Mar 15
Public consultation on ward boundaries	April 15	July 15
<i>(Optional) Development of revised proposals for wards, consultation on revised proposals, local inquiry</i>	Sep 15	Dec 15
LGBCS considers all representations and develops final recommendations before submitting reports to Scottish Ministers	Sep 15	May 16

Start and end dates are estimates at this time.

The change in councillor numbers is likely to mean significant changes to ward boundaries. However, it should be noted that even were there to be no change in councillor numbers, it is possible that ward boundaries would have to be redrawn to reflect changes in the distribution of electors within the local authority area and achieve parity. Parity is the first criteria set down in the Rules to Be Observed in Considering Electoral Arrangements contained in the Local Government Scotland Act 1973 (as amended) Schedule 6. The legislation states that the number of electors in each electoral ward divided by the number of councillors to be returned in that ward shall be, as nearly as may be, the same. Subject to this requirement, it is desirable to fix boundaries which are easily identifiable, and to respect local ties.

Further reports will be brought to the Partnership and Resources PDSP and Council Executive as required.

D4 Partnership & Resources PDSP

The consultation will be considered by a Special P&R PDSP on 14th April 2014. A verbal update will be provided.

D6 Issues for Consideration

In considering a response to the LGBCS, as well as considering the proposal itself, the Executive may wish to consider the methodology used by the LGBCS. This could include:

- Whether the Executive agrees with the inclusion of deprivation in the methodology given that no evidence has been provided to support a view that higher deprivation levels in an area have a significant impact on the workload of councillors.
- That the requirement for electoral parity means that an increase or decrease in councillor numbers will be reflected across a council area and not concentrated in areas of high or low deprivation

E. CONCLUSION

The LGBCS review of local government electoral arrangements has started with proposals on council size. These have been developed using a methodology which takes account of population density and deprivation. The proposal for West Lothian is that the council size increase by one.

Comments need to be submitted to the LGBCS by 23 April 2014.

The Council Executive is asked to agree a response to the LGBCS on their proposal on council size.

F. BACKGROUND REFERENCES

Meeting of the Partnership and Resources PDSP held on 16 August 2013 - Fifth Periodic Review of Electoral Arrangements in Scotland

Meeting of the Partnership and Resources PDSP held on 14 April 2014 - Fifth General Review of Electoral Arrangements in Scotland – Proposal on Council Size

Appendices/Attachments: None

Contact Person: Caroline Burton, EP/Elections Officer; caroline.burton@westlothian.gov.uk; 01506 281651

Graham Hope, Chief Executive

Date of meeting: 15th April 2014



**West Lothian
Council**

COUNCIL EXECUTIVE

GENERAL SERVICES CAPITAL BLOCK BUDGET ALLOCATIONS

REPORT BY HEAD OF FINANCE AND ESTATES

A. PURPOSE OF REPORT

To enable Council Executive to agree the allocation of block budgets to specific projects within the general services capital programme.

B. RECOMMENDATION

It is recommended that Council Executive:

1. Approves the allocation of capital block budgets to specific projects for 2015/16 to 2017/18;
2. Approves the revised block budget allocations for Roads and Related Assets for 2014/15, updated to take account of latest asset condition information.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Focusing on customers' needs, being honest, open and accountable, making best use of our resources, working in partnership.
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	The council's General Services Capital Programme is managed within the stringent requirements set out in the Prudential Code.
III	Implications for Scheme of Delegations to Officers	None.
IV	Impact on performance and performance Indicators	Effective capital implementation is vital to service performance.
V	Relevance to Single Outcome Agreement	None.
VI	Resources - (Financial, Staffing and Property)	There are proposed capital block budget allocations of £31.196 million in 2015/16 to 2017/18.
VII	Consideration at PDSP	Asset Lead Officers will provide asset performance management reports to relevant Policy Development and Scrutiny Panels.
VIII	Other consultations	Depute Chief Executives, Heads of Service, Asset Lead Officers and Local Area Committees.

D. TERMS OF REPORT

1. Background

The Council, on 29 January 2013, approved a five year asset management and general services capital programme for 2013/14 to 2017/18. This was a culmination of an exercise involving updated business cases for investment and a corporate prioritisation process. Block budgets were allocated to specific projects for 2013/14 and 2014/15 at this time, with a commitment that proposals for allocating remaining block budgets from the approved programme for 2015/16 to 2017/18 would be prepared and presented to Local Area Committees (LACs) for consultation.

This report sets out the proposed allocation of block budgets for 2015/16 to 2017/18, as well as proposed updates to the 2014/15 block budget programme for Roads and Related Assets.

2. 2015/16 to 2017/18 Proposed Block Budget Allocations

Proposed allocations of block budgets to individual schemes for 2015/16 to 2017/18 have been undertaken by officers on a needs basis to ensure that the council has appropriate assets for service delivery and attainment of priorities.

The total proposed investment from the allocation of the remaining block budgets is £31.196 million, split by asset type as follows:

Asset Type	Budget £'000
Property Assets	9,382
Roads & Other Related Assets	18,223
Open Space Assets	3,591
Total	31,196

The proposed allocations detailed in Appendix 1 have been presented to LACs for consultation throughout February to April 2014. A number of queries on specific projects were raised, to which Asset Lead Officers provided responses. The LACs have noted the content of the block budget allocations for each ward and have proposed no amendments.

Summary information on the block programmes is provided below.

Property Assets

The block budgets within the property asset group relate to planned improvements within council operational buildings. The goal of property asset management, and therefore the planned improvement programme, is to ensure that properties are in an appropriate condition and maintained effectively. The allocation of the planned improvement block budgets is based on the most up to date information regarding building condition and is a reflection of the works required to maintain the council's operational buildings. However, as there are a number of potential risks and uncertainties such as unforeseen construction risks, such as asbestos, additional works identified during construction and excessive construction inflation the budgets are subject to review annually.

Roads and Other Related Assets

Investment within the roads and other related assets grouping is aimed at maintaining key infrastructure assets and is based on most recent condition surveys. While the budgets have been allocated based on these surveys circumstances can change. Council agreed in December 2013 that a contingency amount should be retained within the roads and other related assets category, to allow budget holders to react to unexpected works that are identified during condition surveys without having to reprogramme other planned works.

A number of projects planned for 2014/15 were reprioritised due to updated condition information and were included in the information reported to LAC's, and are now proposed to be undertaken later in the programme. The projects to be rephased are as follows:

Project	Budget £'000
Rephased to 2015/16	
B9080 West of Boundary at M9 Overpass	53
C7 Armadale (Glenwood Drive)	40
C9 Bathgate – Uphall (Various Locations)	130
Hospital Interchange Bridge	65
Rephased to 2015/16 and 2016/17	
Camps Viaduct (Almondell Country Park)	582
Rephased to 2016/17	
Baptist Bridge	45
River Almond Bridge (Blackburn)	30
Rephased to 2017/18	
Crofthead Interchange East Bridge	75
Crofthead Interchange West Bridge	75

Open Space Assets

The block budgets identified within the open space asset group focus on open space and sports facilities planned improvements, parks drainage and children's play areas. The aim of any investment in open spaces is to ensure the improved quality, usability and content of the areas and the prioritisation basis is unchanged from previous block budget allocations. The largest risk to the scheduling of open space assets is weather conditions, and it is recognised that community needs and demands can change over time. A contingency amount has also been retained for these budgets to allow budget holders to react to unforeseen pressures.

3. 2014/15 Revised Block Budget Allocations – Roads and Related Assets

During the process of updating condition surveys to allocate the block budgets for 2015/16 to 2017/18, officers within roads and structures also reviewed the projects planned for 2014/15, to ensure that planned works were still appropriate based on most recent asset condition information. As a result, officers are proposing some amendments to the approved block budget allocations for 2014/15.

A number of new projects have been identified that have been prioritised based on updated condition surveys, and it is proposed that these be added to the programme for 2014/15. The projects to be added are as follows:

Project	Budget £'000
Roads	
B792 Torphichen	29
C24 West from B7008	130
Structures	
Bells Burn Tunnel	50
Deans Road Railway Bridge	85
Eliburn Road Bridge	185
Lochshot Burn Bridge	25
Ramsay Coven Footbridge	125
Skolieburn Bridge	65
Starlaw Armco Culvert	20
Total	714

Planned works at Linhouse Bridge have been reassessed, and the work required relates to a wall beside the bridge rather than the bridge itself. It is therefore proposed to remove the specific project allocation of £25,000 from the block budget for 2014/15 and complete the required works as part of the ongoing capital programme for improvements to retaining walls.

The current 2014/15 approved programme includes £75,000 for major improvement works at Williamston Interchange Bridge. However, concrete repairs have been undertaken on this structure during 2013/14 which have resulted in the bridge index increasing significantly. Therefore, it is proposed that the capital allocation for this project is removed from the programme as no further works are required.

A revised block budget allocation for Roads and Related Assets for 2014/15 is provided in Appendix 2.

E. CONCLUSION

This report sets out the proposed allocation of block budgets within the capital programme for 2015/16 to 2017/18 and amendments to the approved allocations for 2014/15. Approval of the programme will allow the ongoing implementation of the capital plan to proceed resulting in significant improvements to services provided by the council and to the overall asset infrastructure throughout West Lothian.

F. BACKGROUND REFERENCES

Asset Management and General Services Capital Programme 2013/14 to 2017/18 – report by Head of Finance and Estates to Council 29 January 2013

2013/14 and 2014/15 General Services Capital Programme – report by Head of Finance and Estates to Council Executive 25 June 2013

2014/15 to 2017/18 General Services Capital Programme Update – report by Head of Finance & Estates to Council 19 December 2013

General Services Capital Programme Update – reports by Head of Finance & Estates to Local Area Committees February and March 2014

Appendices/Attachments:

Appendix 1 – Proposed Capital Block Budget Allocations 2015/16 to 2017/18

Appendix 2 – Revised Capital Block Budget Allocations 2014/15 – Roads and Related Assets

Contact Person: Ailsa MacKerrow, Accountant

Email: ailsa.mackerrow@westlothian.gov.uk - Tel. No.: 01506 281282

Donald Forrest
Head of Finance and Estates
15 April 2014

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
PROPERTY ASSETS				
<u>Planned Improvements and Statutory Compliance</u>				
<u>Schools Planned Improvements</u>				
Nursery Schools				
Bathgate West Nursery - Render	0	0	70	70
Bonnyton Nursery - Clarifier and Roof	0	0	56	56
Boundary/Security Fence Upgrade Programme	0	0	5	5
Decoration/Floorcovering programme (Common Areas/Halls)	5	5	5	15
Eastertown Nursery - Toilets	0	15	0	15
Glenvue Nursery - Rewire and Heating	100	0	0	100
Internal Improvements/Minor Works	5	6	10	21
Inveralmond EYC - Boilers	10	0	0	10
Kirkhill Nursery - Toilets, Render & Windows	0	80	0	80
Ladywell Nursery - Windows and Lighting (fittings)	0	0	60	60
Rainwater Goods & Drainage Upgrade Programme	5	5	5	15
Woodlands Nursery - Boilers	3	0	0	3
Nursery Schools - Total	128	111	211	450
Primary Schools				
Addiewell / St Thomas PS - Electric Heating (school only)	0	0	70	70
Armada PS - Roof	0	100	0	100
Boundary/Security Fence Upgrade Programme	25	25	25	75
Deans PS - Lighting (fittings) and Windows	100	0	0	100
Decoration/Floorcovering programme (Common Areas/Halls)	50	50	25	125
Dedridge PS - Toilets	0	0	50	50
Fallaill PS - Lighting (fittings)	0	0	75	75
Internal Improvements/Minor Works	50	50	25	125
Livingston Village PS - DHW heaters	0	30	0	30
Mid Calder PS - Lighting (fittings)	0	0	75	75
Murrayfield PS - Roof	0	70	0	70
Our Lady of Lourdes (Blackburn) - Phase 3 (Roof) & Link corridor	250	0	0	250
Parkhead PS - Toilets and Lighting (fittings)	0	0	225	225
Polkemmet PS - Roof & Rewire	0	200	150	350
Rainwater Goods & Drainage Upgrade Programme	50	50	50	150
Springfield PS - Rooflights	30	0	0	30
St Anthony's PS - Toilets	0	0	50	50
St Nicholas PS - Roof	0	0	150	150
St Ninians PS - Boilers, Distribution Boards and Roof	45	0	200	245
Stoneyburn PS - Toilets	0	0	50	50
Torphichen PS - Entrance and Toilets	0	0	45	45
Primary Schools - Total	600	575	1,265	2,440
Secondary Schools				
Boundary/Security Fence Upgrade Programme	25	25	25	75
Decoration/Floorcovering programme (Common Areas/Halls)	50	50	50	150
Internal Improvements/Minor Works	50	50	28	128
Inveralmond HS - Emergency Lighting, Gas Proving and Fascia's	92	300	0	392
James Young Academy - Emergency Lighting, Gas Proving, Distribution Boards	140	0	0	140
Linlithgow Academy - Gas Proving, Distribution Boards, Windows and HE Classrooms	122	80	280	482
Rainwater Goods & Drainage Upgrade Programme	50	50	50	150
St Kentigerns - Emergency Lighting, Gas Proving and Roof	275	0	0	275
St Margaret's Academy - Boilers and Gas Proving	72	0	0	72
West Calder HS - Gas Proving	35	0	0	35
Secondary Schools - Total	911	555	433	1,899
Special Schools				
Boundary/Security Fence Upgrade Programme	20	20	20	60
Cedarbank - Roof & Rewire	225	75	0	300
Decoration/Floorcovering programme (Common Areas/Halls)	25	25	25	75
Internal Improvements/Minor Works	25	25	25	75
Ogilvie - Boilers	0	0	50	50
Pinewood Roof & Internal Works	200	85	0	285
Rainwater Goods & Drainage Upgrade Programme	25	25	25	75
Special Schools - Total	520	255	145	920
Schools Planned Improvements - Total	2,159	1,496	2,054	5,709

PROPOSED CAPITAL BLOCK BUDGET ALLOCATIONS 2015/16 TO 2017/18

Appendix 1

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
Operational Buildings Planned Improvements				
Arts Venues				
Howden Park Centre - External Painterwork	0	10	0	10
Minor Planned Improvements	5	5	5	15
Public Art - New School Breich	31	0	0	31
Arts Venues - Total	36	15	5	56
Care Homes				
Bathroom Upgrade Programme (Limecroft and Whitdale)	0	110	110	220
Brucefield House - Boilers	15	0	0	15
Burngrange - Compartmentation Upgrade	40	0	0	40
Cunnigar - Boilers, Sewage Pumps and Lighting	40	0	0	40
Limecroft - Windows and Sprinklers	50	120	0	170
Norvell Lodge - Rewire and Lighting (fittings to communal areas)	0	0	75	75
Whitdale House - Boilers and Lighting (fittings)	0	0	20	20
Care Homes - Total	145	230	205	580
Community Centre & Halls				
Craiginn CC - Boilers	10	0	0	10
Decoration/Floorcovering programme	20	20	20	60
Internal Improvements/Minor Works	40	40	40	120
Murieston Village Hall - Roof	50	0	0	50
Rainwater Goods & Drainage Upgrade Programme	40	40	40	120
Seafeld CC - Roof	100	0	0	100
Community Centre & Halls - Total	260	100	100	460
Country Parks				
Internal Improvements/Minor Works	10	10	10	30
Country Parks - Total	10	10	10	30
Disability Day Centres				
Carmondean Ability Centre - Boilers	0	12	0	12
Eliburn Resource Centre - Roof	50	0	0	50
Eliburn Workshop - Boilers	0	7	0	7
Internal Improvements/Minor Works	5	5	5	15
Disability Day Centres - Total	55	24	5	84
Family Centres				
Internal Improvements/Minor Works	5	5	5	15
Livingston Family Centre - Roof	0	70	0	70
Family Centres - Total	5	75	5	85
Libraries				
Carmondean - Boilers	10	0	0	10
Internal Improvements/Minor Works	10	10	10	30
Rainwater Goods & Drainage Upgrade Programme	0	0	5	5
Whitburn - Boilers	8	0	0	8
Libraries - Total	28	10	15	53
Operational Industrial / Business Units				
Internal Improvements/Minor Works	5	5	5	15
Operational Industrial / Business Units - Total	5	5	5	15
Partnership Centres				
Civic Centre - UPS	50	0	0	50
Internal Improvements/Minor Works	20	20	20	60
Partnership Centres - Total	70	20	20	110
Youth Residential Units				
Internal Improvements/Minor Works	5	5	5	15
Youth Residential Units - Total	5	5	5	15
Sports Pavilions				
Compliance Demolitions	25	25	25	75
Internal Improvements/Minor Works	5	5	10	20
Sports Pavilions - Total	30	30	35	95
Operational Offices Planned Improvements				
Decoration/Floorcovering programme	25	25	25	75
Internal Improvements/Minor Works	30	30	30	90
Rainwater Goods & Drainage Upgrade Programme	15	15	15	45
Operational Offices Planned Improvements - Total	70	70	70	210
Operational Buildings Planned Improvements - Total	719	594	480	1,793

PROPOSED CAPITAL BLOCK BUDGET ALLOCATIONS 2015/16 TO 2017/18

Appendix 1

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
Compliance				
Asbestos Removal Project Contingency	250	250	250	750
Fire Alarm Upgrade Programme	300	300	320	920
Intruder Alarm Upgrade Programme	50	50	50	150
Lift Upgrade Programme	20	20	20	60
Compliance - Total	620	620	640	1,880
TOTAL PROPERTY BLOCK BUDGETS	3,498	2,710	3,174	9,382

ROADS AND RELATED ASSETS

Roads and Footways

A Class Roads - Backlog and Lifecycle Investment

A70 Auchinoon	0	108	0	108
A70 The Beeches (2 Areas)	0	0	118	118
A70 Wester Causewayend	0	0	50	50
A706 East Carribber	0	0	56	56
A706 Linn Bridge (2 Areas)	0	140	0	140
A800 Bathgate near Race Road (2 Areas)	305	0	0	305
A800 Drehorn Cottage	0	127	0	127
A800 Nethermuir	74	0	0	74
A801 Dual Carriageway	0	0	30	30
A89 Tesco Bathgate (2 Areas)	0	0	75	75
A899 Livingston Rd	0	0	24	24
A899 Main St Broxburn	0	26	0	26
A904 16 Pardovan Holdings	41	0	0	41
Allowance for schemes identified from SCRIM results (10%)	50	50	44	144
Contingency - In-Year Response to Condition Surveys	30	49	39	118
A Class Roads - Backlog and Lifecycle Investment - Total	500	500	436	1,436

B Class Roads - Backlog and Lifecycle Investment

B7002 Whitburn Rd Bathgate	0	0	73	73
B7008 at X C24	0	181	0	181
B7008 Harburn	67	0	0	67
B7015 Bents	185	0	0	185
B7015 Jct A706	0	52	0	52
B7031 Kirknewton	0	0	41	41
B8020 Beattie Rd	0	48	0	48
B8020 Niddry Rd (2 Areas)	0	62	0	62
B8028 Balmuir	53	0	0	53
B8028 Barbauchlaw Lodge	0	0	74	74
B8028 Bridgehouse	0	0	68	68
B8028 Strathavon Terrace Westfield	40	0	0	40
B8028 Stratloanhead	0	0	74	74
B9080 West of boundary at M9 overpass	53	0	0	53
Contingency - In-Year Response to Condition Surveys	35	90	93	218
B Class Roads - Backlog and Lifecycle Investment - Total	433	433	423	1,289

C Class Roads - Backlog and Lifecycle Investment

C12 North of Drumcross farm	0	131	0	131
C14 Nr Bridgecastle House	52	0	0	52
C15 near Union Canal	18	0	0	18
C19 Faucheldean (2 Areas)	0	232	0	232
C7 Armadale (Glenwood Drive heading North)	40	0	0	40
C8 Croft Plantation	22	0	0	22
C8 North of Blackridge	22	0	0	22
C9 Bangour Farm Cottages	0	0	308	308
C9 Bathgate - Uphall (various locations)	130	0	0	130
C9 Mounteerie	0	0	43	43
C9 Wester Tartraven (2 Areas)	77	0	0	77
Contingency - In-Year Response to Condition Surveys	45	43	57	145
C Class Roads - Backlog and Lifecycle Investment - Total	406	406	408	1,220

U Class Roads - Backlog and Lifecycle Investment

Atholl Terrace, Bathgate	96	0	0	96
Avontoun Pk Linlithgow	0	0	19	19
Baird Rd Armadale	0	0	21	21
Blyth Rd Broxburn	0	0	24	24
Boghead Crescent / Falside Crescent, Bathgate (4 Areas)	118	0	0	118
Burns Avenue Armadale	0	0	20	20
Cochrane Street Bathgate	0	0	23	23
Drove Rd Armadale	0	0	30	30
Heather Pk Seafield	0	0	25	25

PROPOSED CAPITAL BLOCK BUDGET ALLOCATIONS 2015/16 TO 2017/18

Appendix 1

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
Irvine Crescent Bathgate	0	0	32	32
Jarvey Street Bathgate	0	26	0	26
Linhouse Road East Calder	0	23	0	23
Lothian St Bathgate	0	0	36	36
Main Street Bathgate	25	0	0	25
Newlands Avenue, Bathgate	0	20	0	20
Niddry View,Winchburgh	23	0	0	23
Preston Crescent Linlithgow	0	0	33	33
Shaw Avenue Armadale	0	0	22	22
Stewartfield Crescent Broxburn	0	18	0	18
Stewartfield Rd Broxburn	0	0	20	20
The Glebe West Calder	0	0	21	21
The Green Bathgate	0	0	18	18
Turner St Bathgate	0	20	0	20
U11 East of Torphican/East' Gorm	0	23	0	23
U11 East of Torphichen	32	0	0	32
U11 Easter Gormyre	0	47	0	47
U11 Easter Gormyre	0	0	56	56
U11 Westerwood Cottage	60	0	0	60
U11North of Torphichen	52	0	0	52
U12 Bathgate to Armadale	154	0	0	154
U14 north Beecraigs	0	0	45	45
U14 North of C18	37	0	0	37
U14 South Beecraigs	0	50	0	50
U15 Beecraigs	0	0	22	22
U15 Beecraigs	0	0	22	22
U15 Beecraigs Carpark	0	23	0	23
U15 Beecraigs Sawmill	33	0	0	33
U15 Blackcraig Farm	0	0	18	18
U15 South of Beecraigs Sawmill	0	39	0	39
U15, South mains farm	0	20	0	20
U16 Kingscavil	20	0	0	20
U16 Kingscavil	0	20	0	20
U16 Kingscavil	0	18	0	18
U16 South of Wester Ochiltree	0	18	0	18
U16 South of Wester Ochiltree	0	27	0	27
U18 Jct B8020 Braeview	0	35	0	35
U18 Winchburgh at Canal	0	105	0	105
U2 @ Newton	29	0	0	29
U2 Abercorn House	27	0	0	27
U2 Newton East of Parkhead	0	25	0	25
U29 AT Station House Harburn	0	23	0	23
U29 Broadshaw Harburn	0	0	32	32
U29 Skivo	0	0	70	70
U3 @ Newton	55	0	0	55
U31 Humble Holdings	0	0	18	18
U31 Knowetop	0	0	22	22
U31 Knowetop Kirknewton	0	18	0	18
U32 leyden Rd, Latch Farm ctt	0	54	0	54
U32 Leyden Road	0	29	0	29
U32 Leyden Road Ormiston Farm	0	0	30	30
U34 Morton Rd	0	20	0	20
U34 Morton rd Corston	0	0	32	32
U34 Morton Road	0	27	0	27
U34 Morton Road	0	29	0	29
U34 Morton Road over rail bridge	0	70	0	70
U38 Blackhall Harburn	0	0	27	27
U38 Camilty nr Blackhall frm	25	0	0	25
U38 Harburn	0	0	31	31
U38 Jct C24	0	0	26	26
U38 Sawmill Cottage Harburn	0	0	40	40
U9 Bridgehouse	41	0	0	41
Union Road Bathgate	0	20	0	20
West Burnside Broxburn	0	0	22	22
Contingency - In-Year Response to Condition Surveys	102	82	72	256
U Class Roads - Backlog and Lifecycle Investment - Total	929	929	929	2,787
Non Adopted Roads and Footways				
Addiewell/St Thomas PS, Addiewell - School Playground	33	0	0	33
Armadale PS, Armadale - School Playground	0	132	0	132
Balbardie PS, Bathgate - School Playground	0	50	0	50
Blackridge PS, Armadale - School Playground	176	0	0	176
Deans PS, Livingston - School Playground	0	17	0	17
East Calder PS, East Calder - School Playground	0	35	0	35
Eastertoun PS, Armadale - School Playground	0	27	0	27
Harrismuir PS, Livingston - School Playground	0	66	0	66

PROPOSED CAPITAL BLOCK BUDGET ALLOCATIONS 2015/16 TO 2017/18

Appendix 1

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
Howden St Andrew's PS, Livingston - School Playground	28	0	0	28
Inveralmond Community High - School Playground	0	0	83	83
James Young High - School Playground	0	0	83	83
Linlithgow Academy - School Playground	0	0	83	83
Longridge PS, Longridge - School Playground	36	0	0	36
Our Lady's PS, Stonyburn - School Playground	0	60	0	60
Peel PS, Livingston - School Playground	35	0	0	35
Riverside PS, East Livingston - School Playground	0	40	0	40
Seafield PS, Seafield - School Playground	0	19	0	19
St Anthony's PS, Armadale - School Playground	0	25	0	25
St John Ogilvie PS, Livingston - School Playground	42	0	0	42
St Joseph's PS, Linlithgow - School Playground	27	0	0	27
St Kentigern's Academy - School Playground	0	0	83	83
St Margaret's Academy - School Playground	0	0	83	83
St Ninian's PS, Livingston - School Playground	25	0	0	25
Stoneyburn PS, Stoneyburn - School Playground	44	0	0	44
Toronto PS, Livingston - School Playground	0	16	0	16
West Calder High - School Playground	0	0	85	85
Westfield PS, Westfield - School Playground	0	13	0	13
Williamston PS, Livingston - School Playground	58	0	0	58
Non Adopted Roads and Footways - Total	504	500	500	1,504
Adopted Footways - Backlog and Lifecycle Investment				
Addiewell - Various Locations	0	0	7	7
Almondvale - Various Locations	24	0	0	24
Bankton - Various Locations	0	23	0	23
Blackburn - Various Locations	0	25	0	25
Blackridge - Various Locations	0	235	0	235
Boghall - Various Locations	0	20	0	20
Breich - Various Locations	0	0	107	107
Broxburn Various Locations	24	0	0	24
Craigshill - Various Locations	63	0	0	63
Deans Various Locations	0	36	0	36
Dedridge - Various Locations	156	0	0	156
East Calder - Campus Road	0	0	9	9
Elburn Various Locations	7	0	0	7
Fauldhouse - Various Locations	0	120	0	120
Greenrigg - Various Locations	0	20	0	20
Houston Industrial Estate	0	0	44	44
Howden - Various Locations	0	0	10	10
Kirknewton - Braekirk Avenue	0	0	12	12
Knightsridge Various Locations	5	0	0	5
Ladywell - Various Locations	0	0	13	13
Linlithgow Various Locations	48	0	0	48
Livingston Village - Millfield	0	0	3	3
Longridge - Various Locations	0	0	55	55
Mid Calder - Pumpherston Road	0	6	0	6
Polbeth - Various Locations	0	0	21	21
Pumpherston - Harrysmuir South / Terrace	0	2	0	2
Seafield - Various Locations	0	5	0	5
West Calder - Various Locations	0	0	17	17
Westfield / Bridgehouse - Various Locations	0	0	68	68
Whitburn - Various Locations	214	0	0	214
Whitehill Industrial Estate	0	0	162	162
Winchburgh Various Locations	0	49	0	49
Contingency - In-Year Response to Condition Surveys	59	59	72	190
Adopted Footways - Backlog and Lifecycle Investment - Total	600	600	600	1,800
Roads and Footways Total	3,372	3,368	3,296	10,036
Road Lighting				
A7066, Boghall R/A to Pyramids R/A	67	0	0	67
Bells Burn / Huntburn / Carseknew, Linlithgow	0	0	103	103
Buchan/Hamilton/Monkland Rd/Traprain Cres. Bathgate	0	150	0	150
Church Place, Fauldhouse	64	0	0	64
Deans North Road	0	0	132	132
Deanswood Park, Deans	0	0	206	206
Eastfield Road, Fauldhouse	0	20	0	20
Farquhar Sq. Blackridge	0	0	34	34
Fleming Road, Kirkton	0	44	0	44
Glen Road / Main Street, Deans	0	61	0	61
Granby Avenue, Howden	0	0	191	191
Huron Avenue, Howden	0	174	0	174
Kirk Rd / Marjoribanks St, Bathgate	0	0	107	107
Kirkton North Road, Livingston Village	0	0	138	138

PROPOSED CAPITAL BLOCK BUDGET ALLOCATIONS 2015/16 TO 2017/18

Appendix 1

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
Knightsridge East Rd, Knightsridge	201	0	0	201
Lenzie Avenue, Deans	249	0	0	249
Manitoba Avenue, Howden	144	0	0	144
Marina Road, Boghall	0	71	0	71
McNeil/King/Watson/MacDonald, Armadale	94	0	0	94
Millfield / Burnfield, Livingston Village	0	103	0	103
Minor Works	68	59	65	192
Murieston Road (01NT to 40NT), Murieston	84	0	0	84
Shotts Road, Fauldhouse	0	0	34	34
Simpson Parkway (Mill R/A to Rosebank R/A), Kirkton	0	203	0	203
Tippetknowes Area, Winchburgh	0	0	147	147
Webster Ct/Hall Rd/Almondell Rd link f/paths Broxburn	0	57	0	57
West Muir Rd / The Glebe, West Calder	0	112	0	112
Westhall Rd/Alexander Pk/Joseph Gdns/Linn PI Broxburn	0	57	0	57
Whitburn Rd / South Bridge St, Bathgate	186	0	0	186
Wyndford Avenue, Uphall	0	46	0	46
Road Lighting - Total	1,157	1,157	1,157	3,471

Structures
Adopted Bridges - Assessment and Strengthening of Weak Bridges

Adopted Bridges - Assessment and Strengthening of Weak Bridges Block Budget

Adopted Bridges - Assessment and Strengthening of Weak Bridges - Total

25	25	25	75
25	25	25	75

Adopted and Non Adopted Bridges - Backlog and Lifecycle Investment

Almond Valley Bridge	50	0	250	300
Auchinoon Bridge	0	0	20	20
Baptist Bridge	0	45	0	45
Bathgate Branch Railway Bridge	250	0	0	250
Beeccraigs Reservoir Outlet Footbridge	0	0	15	15
Black Bridge	0	0	20	20
Blackburn Bridge (over River Almond)	0	20	0	20
Brunton Farm Bridge	0	0	10	10
Burnvale Bridge	0	175	0	175
Camps Viaduct (Almond Country Park)	242	340	0	582
Centre Interchange East Bridge	0	50	0	50
Cousland Footbridge (Painting)	120	0	0	120
Cousland Interchange Bridge	25	0	0	25
Crofthead Interchange East Bridge	0	0	75	75
Crofthead Interchange West Bridge	0	0	75	75
Cross Bridge	0	0	20	20
Cuthill Bridge	0	247	0	247
Dedridge North Overbridge	0	175	0	175
Drumcross Bridge	0	0	10	10
Easter Foulshiels Bridge	0	0	10	10
Easter Longridge Bridge	0	0	10	10
Easton Culvert	0	0	10	10
Eliburn /Kirkfield Footbridge	75	0	0	75
Guiltyhaugh Railway Bridge	250	0	0	250
Heatherlands Bridge	0	15	0	15
Hospital Interchange Bridge	65	0	0	65
Houstoun Footbridge (Painting)	0	0	100	100
Humbie Armco Culvert	0	15	0	15
Inchcross Place Culvert	15	0	0	15
Mid Calder Bridge	0	50	0	50
Moss Interchange Bridge	25	0	0	25
Muldron Armoc Culvert	35	0	0	35
Nettlehill Railway Bridge	25	75	0	100
New Farm Bridge	0	0	10	10
Queens Terrace Footbridge	0	0	25	25
Riccarton Bridge	0	0	10	10
River Almond Bridge (Blackburn)	0	30	0	30
Rusha Bridge	40	0	0	40
Skolieburn Bridge	0	0	610	610
Starlaw Over Railway	35	0	0	35
Strathloanhead Culvert	0	0	10	10
Underpass refurbishment (various locations in Livingston)	295	310	257	862
Adopted and Non Adopted Bridges - Backlog and Lifecycle Investment - Total	1,547	1,547	1,547	4,641

Structures - Total

1,572	1,572	1,572	4,716
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TOTAL ROADS AND RELATED ASSETS BLOCK BUDGETS

6,101	6,097	6,025	18,223
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PROPOSED CAPITAL BLOCK BUDGET ALLOCATIONS 2015/16 TO 2017/18

Appendix 1

	Proposed Budget 2015/16 £'000	Proposed Budget 2016/17 £'000	Proposed Budget 2017/18 £'000	Proposed Total Budget £'000
OPEN SPACE ASSETS				
Open Space and Sports Facility Planned Improvements				
Almondvale Park, Livingston (existing project)	87	0	0	87
Balbardie Park of Peace	0	0	116	116
Bankton Mains Park, Murieston	0	117	0	117
Central Recreation Park, Deans	0	54	0	54
Clement Rise Park, Dedridge	0	0	63	63
Country Parks Project Fund	20	20	20	60
Craigspark, Craigshill	0	0	63	63
Dickson Street Park, West Calder (existing project)	20	0	0	20
Douglas Avenue, Linlithgow (existing project)	20	0	0	20
Drumshoreland Park, Pumpherston	0	0	63	63
Fells Rigg Park, Carmondean	50	0	0	50
Glebe Park, Uphall	0	0	63	63
Hunter Grove Park, Whitburn	0	54	0	54
Learmonth Gardens, Linlithgow	60	0	0	60
Linlithgow Loch Park	0	0	85	85
Little Boghead Nature Park	18	0	0	18
Livingston Greenways	0	115	0	115
Marchwood Crescent Park, Bathgate	0	0	47	47
Marrfield Park, Uphall Station	0	0	63	63
Meadow Crescent Park, Fauldhouse	62	0	0	62
Park Furniture	0	27	27	54
Sommers Park, Mid Calder	60	0	0	60
St Anthony's Park, Armadale	45	0	0	45
Stonebank, Ladywell	0	0	63	63
Sutherland Way, Knightsridge	63	0	0	63
Torphichen Park	60	0	0	60
Watson Park, Armadale	0	0	76	76
Wildflower Meadows	7	6	0	13
Contingency - In-Year Response to Condition Surveys	48	44	83	175
Open Space and Sports Facility Planned Improvements - Total	620	437	832	1,889
Open Space Parks Drainage				
Drainage Efficiency Improvements	22	18	0	40
East Calder Park	0	0	54	54
Kettilstoun Mains, Linlithgow	135	0	0	135
Stewartfield Park, Broxburn	0	90	0	90
Contingency - In-Year Response to Condition Surveys	18	12	6	36
Open Space Parks Drainage	175	120	60	355
Children's Play Areas				
Adambrae, Livingston.	68	0	0	68
Badgers Brook Play Area & Skatepark, Broxburn.	0	0	81	81
Balbardie Park Skate Park, Bathgate.	0	69	0	69
Bellsquarry Public Park	63	0	0	63
Blaeberryhill Play Area & Skatepark, Whitburn.	0	134	0	134
Burghmuir Court, Linlithgow	41	0	0	41
Chestnut Grove, Craigshill.	0	0	36	36
Ecclesmachan	0	0	68	68
Falside, Bathgate.	0	36	0	36
Fells Road, Polbeth.	0	0	68	68
Glenmavis, Bathgate.	0	0	68	68
Hazelwood Park, Eliburn	0	36	0	36
Laverock Park, Linlithgow	0	68	0	68
Marchwood Crescent, Bathgate.	0	68	0	68
Millerfield, Linlithgow.	0	0	36	36
Northfield Meadow, Longridge	39	0	0	39
Puir Wives Brae, Bathgate	0	0	69	69
Queens Gardens, East Calder	41	0	0	41
Watson Park, Armadale	69	0	0	69
Windyknowe, Bathgate	69	0	0	69
Contingency - In-Year Response to Condition Surveys	38	41	41	120
Children's Play Areas - Total	428	452	467	1,347
TOTAL OPEN SPACE BLOCK BUDGETS	1,223	1,009	1,359	3,591
TOTAL BLOCK BUDGET ALLOCATION	10,822	9,816	10,558	31,196

31196

REVISED CAPITAL BLOCK BUDGET ALLOCATIONS 2014/15
ROADS AND RELATED ASSETS

Appendix 2

Revised
Budget
2014/15
£'000

Roads and Footways

A Class Roads - Backlog and Lifecycle Investment

A705 Cousland Road	78
A705 Redmill Cottages to Pretoria Cottages, East Whitburn	35
A705 West Main Street, Blackburn to bridge over Almond	39
A706 Whitdale Roundabout to Armadale Rd	65
A800 Balmuir Road to Millhouse Lane	78
A801 Feasibility	25
A89 Boghall Roundabout, Bathgate	150
A89 Moore House School to Bathgate Academy	51
A904 Newton Village to Queensferry	40

A Class Roads - Backlog and Lifecycle Investment - Total **561**

B Class Roads - Backlog and Lifecycle Investment

B792 Torphichen	29
B7015 From junction with Rosebank Rd to Simpson Parkway	60
B8020 Beattie Rd at M9 underpass	26
B8020 Greendykes Road @ Albyn Cottages, Broxburn	186
B8046 Approx. 200m north & south of Ecclesmachan	60
B8046 Pumpherston Road near 'South Village'	50
B8084 Junction with B8028, approx. 500m west of junction with A801	12
Contingency - In-Year Response to Condition Surveys	24

B Class Roads - Backlog and Lifecycle Investment - Total **447**

C Class Roads - Backlog and Lifecycle Investment

C12 Bathgate - Uphall (various locations)	125
C24 West from B7008	130
C27 Lanark Road Junction - Mid Calder	45
C9 Bathgate - Torphichen (s/dress whole road)	60
Contingency - In-Year Response to Condition Surveys	40

C Class Roads - Backlog and Lifecycle Investment - Total **400**

U Class Roads - Backlog and Lifecycle Investment

Ladywell East Road Phase 2	70
Almond West Road, Craigshill	94
Deans North Road	190
Station Road, Broxburn	67
Hartwood Road, West Calder	55
Marina Road, Boghall	75
Glenmore Cul-de-sacs, Whitburn	147
Raeburn Crescent, Whitburn	75
High Academy Street/Academy Street, Armadale	68
St. Margaret's Drive, Armadale	43
Eldrick Avenue/Eldrick Crescent, Fauldhouse	22
Pentland Avenue, Boghall	35

U Class Roads - Backlog and Lifecycle Investment - Total **941**

Non Adopted Roads and Footways

St. Columba's PS, Boghall - School Playground	69
Blackburn PS, Blackburn - School Playground	126
Dechmont Infant PS - School Playground	41
Knightsridge PS, Livingston - School Playground	58
St. Mary's PS, Bathgate - School Playground	9
St. Joseph's PS, Whitburn - School Playground	49
Mid Calder PS, Mid Calder - School Playground	55
Murrayfield PS, Blackburn - School Playground	43
Kirkhill PS, Uphall - School Playground	40
Croftmalloch PS, Whitburn - School Playground	37
Uphall PS, Uphall - School Playground	3
Non Adopted Roads and Footways General	82

Non Adopted Roads and Footways - Total **612**

REVISED CAPITAL BLOCK BUDGET ALLOCATIONS 2014/15
ROADS AND RELATED ASSETS

Appendix 2

**Revised
Budget
2014/15
£'000**

Adopted Footways - Backlog and Lifecycle Investment

Bathgate - Various Locations	110
Armada - Various Locations	375
Contingency - In-Year Response to Condition Surveys	37

Adopted Footways - Backlog and Lifecycle Investment - Total	522
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Road Lighting

Avon Rd / Balbardie Cres.Ave / Lothian.Dundas.Turner St, Bathgate	112
Belvedere Rd / Hillhouse Ave / Dykeside Rd, Bathgate	122
Byburn / Main St, Ecclesmachan	47
Cochrane St / Marmion Rd, Bathgate	36
Dedridge East Road, Dedridge	176
Harburn / Larbert Avenue, Deans	223
Knightsridge West Rd, Knightsridge	101
Minor Works	63
Nellburn / Deans South District Rd	99
Nelson Avenue, Howden	178

Road Lighting - Total	1,157
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Adopted and Non Adopted Bridges - Backlog and Lifecycle Investment Block Budget

Alderstone Bridge	50
Almond View Culvert	30
Bells Burn Tunnel	50
Brunton Culvert	25
Burnhouse Farm Armco Culvert	20
Burnside Way Bridge	35
Cleuchbrae Bridge	15
Deans Road Railway Bridge	85
Eliburn Road Bridge	185
Glendevon Footbridge	55
Haggarys Brig Footbridge	50
Knightsridge West Railway Bridge	50
Lighton F/B over Breich Water	50
Linhouse Arch Bridge	40
Linhouse Armco Underpass	35
Loaninghill Armco Culvert	25
Lochshot Burn Bridge	25
Naysmith Bridge (Almond Country Park)	15
Ramsay Coven Footbridge	125
Retaining Walls - Backlog lifecycle maintenance	91
Skoliesburn Bridge	65
Starlaw Armco Culvert	20
Underpass refurbishment (various locations in Livingston)	347
Wallace Mill Pipe Bridge	120
Woodend Bridge	30

Adopted and Non Adopted Bridges - Backlog and Lifecycle Investment - Total	1,638
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TOTAL ROADS AND RELATED ASSETS REVISED BLOCK BUDGETS 2014/15	6,278
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**West Lothian
Council**

COUNCIL EXECUTIVE

CHANCELLOR'S BUDGET 2014

REPORT BY HEAD OF FINANCE AND ESTATES

A. PURPOSE OF REPORT

To provide the Council Executive with an update in relation to the announcements contained in the Chancellor of the Exchequer's 2014 Budget, and to provide an indication of the measures that may have financial implications for the council.

B. RECOMMENDATION

It is recommended that the Council Executive:

- a) Notes the content of the report
- b) Agrees that the Head of Finance and Estates will take account of the measures which impact on the council.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Being honest, open and accountable Making the best use of our resources
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	None
III	Implications for Scheme of Delegations to Officers	None
IV	Impact on performance and performance Indicators	None
V	Relevance to Single Outcome Agreement	None
VI	Resources - (Financial, Staffing and Property)	Spending decisions made by the UK Government impact on the Scottish Government's budget via the Barnett formula. This in turn has implications for available resources for the council via the finance settlement received from the Scottish Government. The financial position outlined in the Budget emphasises the importance of proactive financial planning and forecasting which is linked to outcomes to address the public spending challenges.

VII	Consideration at PDSP	None
VIII	Other consultations	This report is part of the process of briefing and consultation with elected members on issues relating to future year funding and the council's financial strategy.

D. TERMS OF REPORT

1. Introduction

The Chancellor delivered his 2014 Budget Statement to the House of Commons on 19 March 2014. The statement builds on the measures previously set out in the 2013 Autumn statement. The 2014 Budget announcement provided further detail on the UK Government's deficit reduction plans and set out plans for economic growth. The Budget also included updated assessments from the Office for Budget Responsibility (OBR) on the forecasts for growth and borrowing.

The Chancellor outlined that the 2014 Budget would focus on securing recovery and building a resilient economy. The Budget highlights the key steps in the UK Government's long term economic plan – UK Economy and public finances, growth and fairness. The measures announced in the budget to support these objectives were considered to be fiscally neutral with a reduction in tax funded by a reduction in spending.

The OBR's March 2014 'Economic and Fiscal Outlook' shows that the government remains on course to meet the fiscal mandate one year early, in 2017/18. The Government's fiscal mandate is that policy should be consistent to balance the cyclically adjusted current budget (CACB). The CACB is the amount the Government borrows to finance non-investment adjusted for the level of the economy.

2. Overall Economic Position

The Government believes that the current long-term economic plan has provided the foundations for economic recovery. This Budget is intended to set out further action to secure the recovery, build a resilient economy and support businesses to invest, export, and create jobs.

OBR Projections

The Chancellor's 2014 Budget Statement included the OBR's updated forecasts for the economy, growth and government borrowing. The OBR have revised upward their projection for growth to 2.7% in 2014 and 2.3% in 2015, and forecasts GDP growth of 2.6% in 2016, 2.6% in 2017 and 2.5% in 2018. GDP is expected to return to its pre-crisis peak in the third quarter of 2014. The revised projections, compared to the Autumn Statement 2013, are summarised as follows:

Autumn Statement 2013	2014	2015	2016	2017	2018
Growth (GDP)	2.4%	2.2%	2.6%	2.7%	2.7%
Net Borrowing	£96bn	£79bn	£51bn	£23bn	-£2bn
Government Debt (% GDP)	78.3%	80.0%	79.9%	78.4%	75.9%
Inflation (CPI)	2.3%	2.1%	2.0%	2.0%	2.0%

Budget 2014	2014	2015	2016	2017	2018
Growth (GDP)	2.7%	2.3%	2.6%	2.6%	2.5%
Net Borrowing	£84bn	£68bn	£42bn	£18bn	-£1bn
Government Debt (% GDP)	77.3%	78.7%	78.3%	76.5%	74.2%
Inflation (CPI)	1.9%	2.0%	2.0%	2.0%	2.0%

The OBR have projected that the Public Sector Net Debt (PSND) will peak at 78.7% in

2015/16, before falling each year and reaching 74.2% of GDP in 2018/19.

General Economic Outlook

Recent UK growth has been positive. In the fourth quarter of 2013, the UK experienced the fastest growth of the G7 economies, jointly with Canada. In the International Monetary Fund's (IMF) latest 'World Economic Outlook Update', GDP growth forecasts for the UK were revised up by more than any other G7 economy in both 2014 and 2015.

The UK however, faces a number of external risks, including slowing growth and financial instability in some emerging markets, and on-going weakness in the euro area. The situation in Ukraine is a new risk, and any further deterioration is likely to have some impact on the UK.

Unemployment

In the three months to December 2013, the UK unemployment rate was 7.2%, the lowest rate for nearly five years. All nations and regions of the UK saw an increase in employment from the first quarter of 2010 to the third quarter of 2013. Scotland has the highest employment rate of the nations in the UK. The OBR has revised down its forecast for unemployment and expects a rate of 6.8% in 2014, falling to 5.4% in 2018.

3. Public Services

The following tables set out the changes to UK public spending in 2013/14 to 2018/19 compared to the March 2013 Budget:

Revenue Expenditure

Cash Figures	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
	£ billion	£ billion	£ billion	£ billion	£ billion	£ billion
Public Sector Current Expenditure – 2013 Budget Statement	672.9	680.0	694.2	703.7	713.0	Not reported
Public Sector Current Expenditure – 2014 Budget Statement	667.9	679.9	691.5	698.8	706.4	719.3
Difference	-5.0	-0.10	-2.70	-4.90	-6.60	

The Public Sector Current Expenditure (PSCE) is the total of the Revenue Annually Managed Expenditure (for example non-domestic rates and tax credits), Revenue Departmental Expenditure Limits (for example the Scottish Government Block Budget) and ring-fenced depreciation.

Capital Expenditure

Cash Figures	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
	£ billion	£ billion	£ billion	£ billion	£ billion	£ billion
Public Sector Gross Investment – 2013 Budget Statement	47.2	50.4	50.4	51.3	52.1	Not reported
Public Sector Gross Investment – 2014 Budget Statement	47.6	52.1	52.1	53.8	54.8	57.2
Difference	0.40	1.70	1.70	2.50	2.70	

The movement in the above Revenue and Capital expenditure will have implications for the available resources for the council via the finance settlement received from the Scottish Government.

The table below sets out the proposed movement in the Scottish Government Block Budgets compared with the March 2013 Budget Statement:

Scottish Government Block Budget

	2014/15			2015/16		
Cash Figures	Revenue	Capital	Total	Revenue	Capital	Total
	£ billion	£ billion	£ billion	£ billion	£ billion	£ billion
March 2013 Budget	25.3	2.9	28.2	-	-	-
March 2014 Budget	25.8	2.9	28.7	25.8	3.0	28.8
Movement	0.5	0.0	0.5	-	-	-

The March 2014 Budget is the first budget to include figures for 2015/16 so no comparisons can be made with previous budget announcements.

Pay Assumptions and Pay Progression Reviews

The Chancellor confirmed that pay awards for most public sector workers covered by the recent Pay Review Body recommendations will be limited to 1% in 2014/15, and that the intention is to limit awards to 1% in 2015/16.

The UK Government has exercised firm restraint over public sector pay. By 2014/15, pay restraint will have reduced spending pressures by an estimated £12 billion. In the civil service, the Government is aiming to remove progression pay by 2015/16. Pay progression is a salary increase reflecting experience in a role and is based mainly on length of service. Proposals have now been agreed with departments covering 50% of the civil service workforce previously identified with progression pay.

Autumn Statement 2013 announced that the government will pilot pay bill control in a number of government organisations from 2014/15. This is a new method of pay restraint where the overall pay budget is controlled for the organisation, rather than the average pay awards.

Building a Stronger Economy

The UK Government first set out its plan for sustainable and long-term economic growth as part of The Plan for Growth and the National Infrastructure Plan.

The government's programme of structural reform is creating an environment for businesses to invest, export and grow. Budget 2014 announces further reforms to capital allowances, energy and housing to support investment and a sustained recovery across the UK. The government will:

- Support businesses across the UK to invest and expand by doubling the annual investment allowance to £500,000 until the end of 2015.
- Take action to boost housing supply by extending the Help to Buy: equity loan scheme and creating a £500 million Builders Finance Fund to provide loans to Small and Medium Enterprise (SME) housing developers.
- Ensure that UK businesses are able to take advantage of new global opportunities by offering the best export finance in Europe, doubling the UK's direct lending programme to £3 billion, cutting interest rates and reducing the cost of long-distance flights for exporters and visitors to the UK.
- Reduce business energy costs to ensure that the UK remains a competitive location for manufacturing, including capping the Carbon Price Support rate at £18 from 2016/17 to 2019/20.

4. Welfare Reform

The Government announced at Spending Round 2013 that a cap on welfare spending will be introduced to improve spending control. Budget 2014 caps welfare spending at £119 billion for 2015/16, rising in line with inflation to £127 billion in 2018/19. The cap includes child benefit, incapacity benefit, winter fuel payment and income support, but does not include state pension and Jobseeker's Allowance.

The welfare cap will be included in the 'Charter for Budget Responsibility' alongside the fiscal mandate. An updated 'Charter for Budget Responsibility' and motion for approval was laid before Parliament on 19 March 2014. MP's approved the Welfare Spending Cap on 26 March 2014 by 520 votes to 22. The OBR will make its first assessment of performance at Autumn Statement 2014.

The role of the OBR is to provide independent analysis of the UK's public finances. The OBR will make an updated assessment of whether the Government is on course to meet the medium term fiscal objectives it has set itself.

5. Pension Reforms

The government announced a fundamental reform to the way people access their pensions. All tax restrictions on pensioners' access to pension pots are to be removed meaning pensioners will no longer be required to purchase an annuity.

From April 2015, the Government will now allow those with a Defined Contribution pension to draw down from it after age 55 at the marginal rate of Income tax instead of the current rate of 55%.

From 27 March 2014, the total pension savings that people can take as a lump sum will be increased to £30,000.

From April 2015, the Government will ensure that all individuals with defined contribution pension pots are offered free and impartial face-to-face guidance at the point of retirement and will make up to £20 million available in the next two years to develop this initiative.

6. Main Implications for West Lothian Council

The Scottish Government will determine the distribution of revised departmental spending figures following the 2014 Budget announcement. Through the Barnett Formula, Scotland will receive an additional £63 million from the spending proposals included within the Budget; however discretionary funding from the UK Government has been reduced in real terms.

On 1 April 2014 John Swinney made an announcement which included the allocation of the UK Budget Barnett consequentials for Scotland. These allocations included; funding for councils over next two years to develop the capital infrastructure needed to increase early learning and childcare provision, funding to local government in 2015/16 to further fund the provision of free school meals for P1-P3 pupils, funding for Help to Buy (Scotland) in 2014/15, funding to further enhance existing measures to support youth employment and funding to provide further support for those affected by the UK Government's programme of welfare reform. COSLA are continuing to discuss a range of issues around funding with the Scottish Government. Further updates will be provided as more information is available.

The 2014 Budget confirms the UK Government's position regarding pay restraint. The review of pay progression and the investigation of savings arising from pay progression reform will continue. Any changes to public sector pay in Scotland will be determined by the Scottish Government for those bodies they control. Local authority pay awards will be

a matter for negotiation between councils and the trade unions.

The Council's 2015/16 funding allocation has still to be formally confirmed following the letter from the Cabinet Secretary for Finance, Employment and Sustainable Growth on 21 February 2014. I will report back to Council Executive once detailed allocations for individual authorities have been confirmed for 2015/16, including any subsequent announcements by the Scottish Government on the allocation of the Scottish Block.

7. Other Announcements

Fuel Duty

The fuel duty increase that was planned for September 2014 has been cancelled.

Tax Allowance

The Chancellor has announced an increase in the personal allowance. From April 2015, the personal allowance will rise by £500 to £10,500 meaning that people will not pay tax on the first £10,500 of earnings.

Alcohol Duty

The duty rates on spirits, Scotch Whisky and most ciders will be frozen in cash terms this year but the duty rates on wine and high strength sparkling cider will increase by Retail Price Index (RPI). General beer duty will reduce by 2% from 24 March 2014, worth 1 penny per pint of beer.

Coinage

A new £1 coin is to be introduced in 2017. The government expects the new coin to be bi-metallic with 12 sides. It will adopt new Royal Mint technology to protect against counterfeiting.

Savings

The starting rate for savings income tax will be set to 0%, instead of the current rate of 10%. The band to which this rate applies will be extended from £2,880 in 2014/15 to £5,000 as of 6 April 2015.

Individual Savings Accounts (ISAs) are to be reformed into a simpler product: the New ISA. The annual subscription limit will be increased to £15,000 from 1 July 2014, and this can be in cash or shares or any combination of the two.

Tax-free Childcare

The Tax-Free Childcare costs cap, against which eligible parents can claim 20% support, will be increased to £10,000 per year for each child. This is worth up to £2,000 per child from autumn 2015.

Corporation Tax

As announced previously, the main rate of Corporation tax will be reduced by 1% in April 2015 to 20%.

E. CONCLUSION

The Chancellor's 2014 Budget is intended to build on measures announced in previous budgets, the 2013 Autumn statement and the Plan for Growth. UK growth was positive in 2013 and forecasts for future growth have been revised upwards by the OBR, however the Government have confirmed their commitment to reducing the deficit. The budget focussed on securing a sustained recovery and building a resilient economy, providing further detail on deficit reduction plans.

Changes to public sector expenditure plans will be passed onto the Scottish Budget through the Barnett Formula and it is for the Scottish Government to decide how to

allocate the Total Scottish Block Budget. I will report back to the Council Executive on any changes to the council's resources following the 2014 Budget Statement.

The on-going commitment to reducing the UK deficit by 2017, means the financial outlook for public finances remains very challenging. Public finances will continue to be constrained and there is a continuing risk that geo-political instability could lead to further pressure on the UK economy. The overall financial position outlined in the 2014 Budget Statement reemphasises that the period ahead remains challenging to the public sector in Scotland, including local government.

F. BACKGROUND REFERENCES

Chancellor's Budget 2013 – report by Head of Finance and Estates to the Council Executive on 9 April 2013

Chancellor's 2013 Autumn Statement – report by Head of Finance and Estates to the Council Executive on 17 December 2013

Contact Person: Gillian Simpson, Accountant – Financial Management Unit
gillian.simpson@westlothian.gov.uk Tel No: 01506 283237

Donald Forrest
Head of Finance and Estates
Date: 15 April 2014



West Lothian
Council

COUNCIL EXECUTIVE

LAND AT ALDERSTONE ROAD, LIVINGSTON
PROPOSED SALE OF 0.49HA TO LIDL UK GMBH AND RELINQUISHMENT OF RIGHTS
OVER ADJOINING LAND

REPORT BY HEAD OF FINANCE AND ESTATES

A. PURPOSE OF REPORT

To seek Council Executive approval for the sale of 0.49Ha of land at Alderstone Road, Livingston to Lidl UK GmbH Ltd and the relinquishment by Lidl of rights over adjoining land.

B. RECOMMENDATION

It is recommended that Council Executive

1. Approves sale of land at Alderstone Road, Livingston to LIDL UK GMBH for £800,000, subject to the terms and conditions set out in the report,
2. Grants delegated powers to the Head of Finance and Estate Services to agree to any changes required to the current terms in order to conclude the transaction, on the basis that any revised terms and conditions still represent best value for the Council.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Being honest, open and accountable, Making best use of our resources,
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Disposal of property governed by S74 (2) of the Local Government (Scotland) Act 1973
III	Implications for Scheme of Delegations to Officers	None
IV	Impact on performance and performance Indicators	Will contribute towards the annual performance indicator for capital receipts
V	Relevance to Single Outcome Agreement	We make the most efficient and effective use of resources by minimising our impact on the built and natural environment.
VI	Resources - (Financial, Staffing and Property)	A capital receipt of £800,000 will be received during the financial year 2014/15, as part of the

	council's budgeted capital receipts programme.
VII Consideration at PDSP	Not applicable.
VIII Other consultations	The local elected members for the ward have been provided with a copy of the report for information.

D. TERMS OF REPORT

The subject land at Alderstone Road, which is shown hatched on the attached plan and which extends to a total of 0.49 Ha (1.22 acres) or thereby, formed part of an option agreement between Livingston Stadia Management Ltd (LSM) and the council. The Council Executive on 17 December 2013 agreed to the renunciation of the option agreement and the return of the land to council control with effect from 1 February 2014. Adjacent land was subject to a ground lease to LSM, and this will revert to the council on 1 July 2014.

Whilst discussions were taking place with LSM for the renunciation of the option agreement, Lidl UK GmbH Ltd (Lidl) approached the council with a proposal to purchase the subject land, between their existing unit and Alderstone Road. Lidl is proposing to develop a new superstore for circa 10,000sqft in their new format. Following completion, their existing store will be refurbished and reconfigured to facilitate a letting to a third party. The existing car parking is a good size and will be sufficient for utilisation by both the existing and proposed development.

Lidl is considered a special purchaser in this case as there is an element of marriage value between the subject property and their existing property by virtue of the existing car park, which will enable Lidl to use the subject property more extensively than other potential purchasers. Marriage Value is where an additional element of value is created by combining two or more interests, where the combined value is more than the sum of the separate values.

Given the specific property characteristics and that the Lidl proposals would increase economic activity in the area it was decided that it was appropriate, in this case, to negotiate directly with Lidl. As Lidl is considered a special purchaser, an external valuation has been obtained.

A review of the legal documentation relating to the land surrounding the Almondvale Stadium has been undertaken and it has been ascertained that Lidl has various rights over an area of land to the north east of their site. The area is shown cross hatched on the attached plan

This land is currently let to LSM under the terms of the ground lease but will be returned to the council on 1 July 2014. However, the rights that have been granted to Lidl make the land of limited use and as a consequence of little value to the council.

With the removal of these rights, the council will have an unencumbered site that is available for letting or sale and will therefore have a significantly higher value in the future. The renunciation of these rights can only occur with Lidl's agreement.

The purchase price of the subject land along with the relinquishment of Lidl's existing rights over the additional area of land, will provide an aggregated value to the council in line with the external valuation that has been obtained.

The proposed terms of the sale are as follows: -

Purchaser – Lidl UK GmbH Ltd (Lidl)

Subjects – 0.49Ha (1.22 acres) or thereby, at Alderstone Road, Livingston

Date of Entry – As soon as possible, following the receipt of planning consent

Purchase Price – £800,000

Use – Supermarket development

Legal Expenses – each party to meet their own legal costs

Special Conditions –

1. Subject to Lidl Executive approval
2. Lidl will relinquish its rights over the land to the rear of the current Lidl store. The area is shown cross hatched on the attached plan.
3. Subject to grant of planning consent to the satisfaction of Lidl
4. Subject to no abnormal ground conditions or the developer costs

E. CONCLUSION

Given the overall state of the property market and the specific circumstances of this case, it is considered to be in the Council's best interest to sell the site at Alderstone Road in accordance with the recommendation contained in this report.

F. BACKGROUND REFERENCES

None

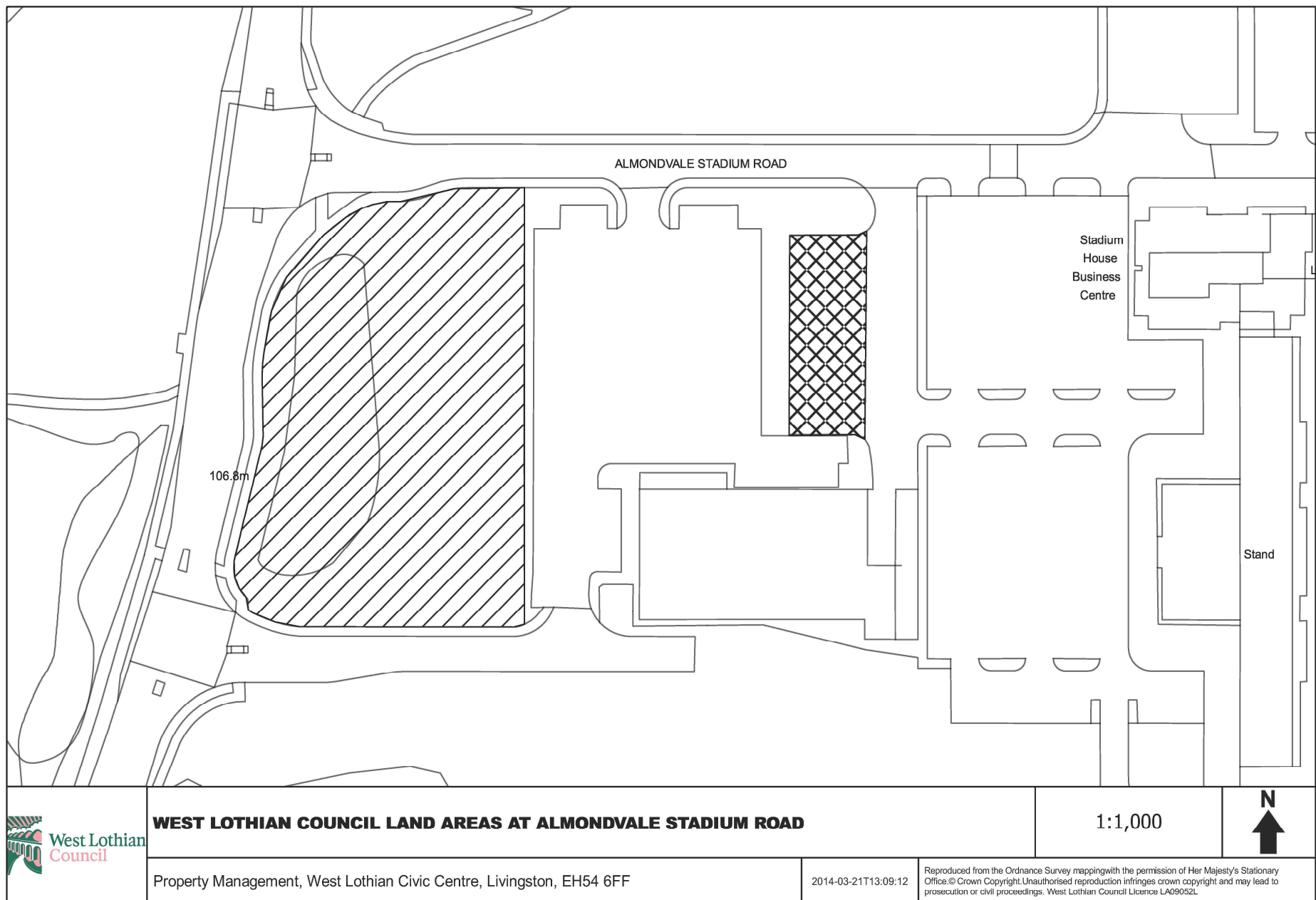
Appendices/Attachments: Location plan attached

Contact Person: Tracey Thomson, Commercial Property Surveyor Telephone 01506 281834

Email: tracey.thomson@westlothian.gov.uk

Donald Forrest, Head of Finance and Estates

Date: 15 April 2014





West Lothian
Council

COUNCIL EXECUTIVE

0.72HA LAND AT HARDIE ROAD, DEANS, LIVINGSTON
PROPOSED SALE TO JASON CRAIG DALY

REPORT BY HEAD OF FINANCE AND ESTATES

A. PURPOSE OF REPORT

The purpose of this report is to seek Council Executive approval for the sale of a residential development site for the development of four Eco dwelling houses.

B. RECOMMENDATION

It is recommended that the Council Executive:

1. Approves the sale of 0.72ha Land at Hardie Road, Livingston to Jason Craig Daly for £150,000, subject to the terms and conditions set out below, and,
2. Authorises the Head of Finance and Estates to carry out any further negotiations with the purchaser in respect of the sale of the site, on the basis that any revised terms and conditions still represent the best capital receipt for the council.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Making best use of our resources.
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	None
III	Implications for Scheme of Delegations to Officers	None
IV	Impact on performance and performance Indicators	Will contribute to capital receipts performance indicator.
V	Relevance to Single Outcome Agreement	Supporting local business and making the best use of resources by minimising our impact on the built environment
VI	Resources - (Financial, Staffing and Property)	The capital receipt of £150,000 will contribute to the council's capital receipt programme for the financial year 2014/15.

VII Consideration at PDSP

Not applicable

VIII Other consultations

The local elected members for the ward have received a copy of this report for their information.

D. TERMS OF REPORT

The subject land is a small gap site in Deans, Livingston which is bordered by a woodland strip to the west and Knowepark Caravans to the east. It is currently vacant and has generated no income for a number of years. Planning Services produced a detailed Planning Brief for the site with planning permission supporting up to four residential units.

The land was placed on the market for sale in December 2013 with a closing date of 14 February 2014. No offers were received at this point and it was remarketed without a closing date. As a result of this further marketing a formal offer was received, the main terms and conditions of which are outlined below.

1. The Purchaser is Jason Craig Daly. He runs a successful Building company, C&D Building Ltd alongside his other company C&D Plumbing Limited. The company specialise in new builds and alterations to existing properties.
2. The purchase price is £150,000 (inclusive of VAT if this is chargeable.)
3. Date of Entry will be 28 days after all suspensive conditions are accepted by the purchaser.
4. The offer is for the development of four Eco Dwelling Houses. The construction of these buildings will incorporate a mixture of technologies and techniques including possible use of recycled and sustainable materials; solar panels; high degree insulation; high efficiency boilers and the use of sustainable build practices to meet or exceed Section 7 of the current building standards.
5. The offer is subject to the Purchaser obtaining detailed Planning Permission as well as acceptable site investigation reports and build costs. These are to be in place by 31 August 2014 or the offer will be withdrawn.
6. Developer Contributions in the form of Cemetery Provisions will be applicable. Educational Planning will also require contributions.
7. There will be numerous other terms and conditions which are common in agreements of this type.

E. CONCLUSION

Given the length of time the land has been marketed for and the lack of offers received previously, it is considered to be in the best interests of the Council that the land is sold to Jason Craig Daly to be developed in accordance with the associated planning brief.

F. BACKGROUND REFERENCES

None

Appendices/Attachments: Location plan attached.

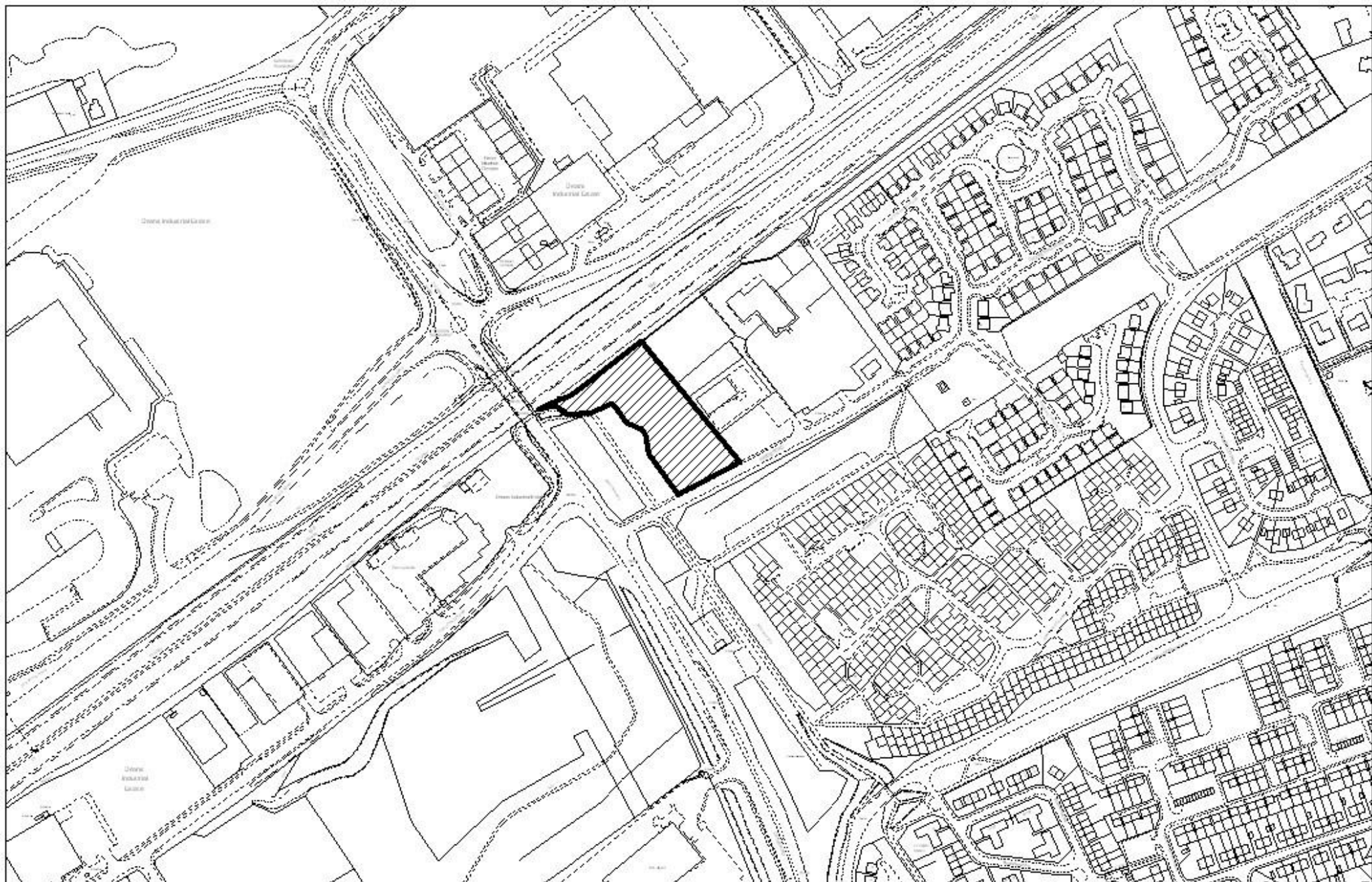
Contact Person: Hannah Sturgess, Graduate Surveyor

Telephone: 01506 283405

Email: Hannah.Sturgess@westlothian.gov.uk

Donald Forest, Head of Finance and Estates

Date: 15 April 2014



	<p>7220 Sq M at Hardie Road, DEANS, Livingston</p> <p>Property Management & Development, Civic Centre, Livingston, West Lothian, EH54 6FF.</p>	<p>1:4050</p> <p>12:02 11/08/2010</p>	
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**West Lothian
Council**

COUNCIL EXECUTIVE

SUPPORT TO CREDIT UNIONS IN WEST LoTHIAN

REPORT BY HEAD OF FINANCE AND ESTATES AND HEAD OF AREA SERVICES

A. PURPOSE OF REPORT

This report sets out for consideration by the Council Executive proposals for one off funding in 2014/15 for financial and other support to be provided to the two local credit unions in West Lothian: the West Lothian Credit Union and Blackburn, Seafield and District Credit Union.

B. RECOMMENDATION

It is recommended that the Council Executive:

1. Notes that officers are working with Blackburn, Seafield and District Credit Union on strategies to support their development which will be reported at a later date:
2. Agrees to grant West Lothian Credit Union £46,385 to support the development of their service:
3. Agrees to provide in kind support to the above credit unions and to Capital Credit Union to develop and promote their services to make them more accessible to potential customers in all council wards in West Lothian:
4. Agrees to provide West Lothian Credit Union with a one off grant of £20,000 to support the delivery of the Choices Loan project.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; providing equality of opportunities; making best use of our resources; and working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	None.
III Implications for Scheme of Delegations to Officers	None
IV Impact on performance and performance Indicators	None.
V Relevance to Single Outcome Agreement	The measures support the outcome 'People most at risk are protected and supported to achieve improved life chances'.

VI Resources - (Financial, Staffing and Property)	The report proposes funding to the credit unions from the funding for credit unions and wider financial inclusion services agreed by the Council Executive on 29 October 2013.
VII Consideration at PDSP	The report fulfils a commitment in the report 'Proposals in response to the impact of welfare reforms changes' approved by the Council Executive on 29 October 2013
VIII Other consultations	Consultation has taken place with partners in the West Lothian Anti-Poverty Strategy Board and with officers and board members of West Lothian Credit Union and Blackburn, Seafield and District Credit Union.

D. TERMS OF REPORT

It is recognised that credit unions are an extremely important mechanism to help people affected by financial exclusion and therefore at risk of poverty to save and borrow money to meet essential needs. Both locally managed credit unions (West Lothian Credit Union and Blackburn, Seafield And District Credit Union) are effective in helping people save and borrow. In addition, the Edinburgh based Capital Credit Union has a common bond that allows it to operate throughout West Lothian.

Officers have consulted separately and jointly with the credit unions to identify a package of support from West Lothian Council which will:

- increase adult membership;
- increase young persons' membership;
- increase the number of community access points; and
- expand the range of support and partnership working.

West Lothian Credit Union

West Lothian Credit Union will:

- increase the number of schools who have a collection by 25%;
- increase its adult membership by 260 (this work will be targeted at those who are 'unbanked', unemployed or in low waged employment); and
- train six volunteers to support new promotional work.

The credit union will have a presence in the following areas:

- Bathgate, Broxburn, East Calder, Linlithow and Bridgend, Livingston East, Livingston North, Livingston South, Uphall and Winchburgh.

In order to support this expansion, West Lothian Credit Union will introduce credEcards to attract new members who at present do not have a bank account. Small to medium businesses will be supported to encourage their staff to join through the payroll deduction scheme. The credit union will recruit, train and deploy six new volunteers to support this work. West Lothian Credit Union will expand its existing service to primary schools and include targeting secondary schools and West Lothian College. The total cost for this will be £46,385.

Blackburn and Seafield District Credit Union

Officers have held constructive discussions with the credit union on how to best support their organisation. The credit union has been extremely positive about working in partnership with both the Council and other credit unions to further expand membership within West Lothian.

A separate report will be presented to the Council Executive in June 2014 which will outline the support to Blackburn and Seafield District Credit Union.

General support from and partnership with West Lothian Council, Community Planning Partners and the credit unions

It is proposed that, through the Anti-Poverty Strategy Board, the council, community planning partners and the credit unions work in partnership to deliver services as follows:

1. Publicising credit union services. This would include a range of activities such as:
 - joint promotions/write ups in the Bulletin and on council Facebook and Twitter pages;
 - closer working with Advice Shop and other council services to promote credit union membership; and
 - promotion through payslips, on plasma screens and on public access computers.
2. Facilitating opportunities in a range of locations to enable new members to join credit unions.
 - By March 2015, one or both credit unions will have a significant presence in each of the nine council wards that will increase their accessibility to members and potential members. This will include regular open sessions in council facilities where people can access credit union services.
3. Facilitating staff in the council and community planning partners to join.
4. Training and information for staff in West Lothian Council and Community Planning Partners that will increase the number of membership referrals from customer facing staff.

At present Capital Credit Union is reassessing its strategy and may well wish to re-engage in West Lothian. It is proposed that officers will enter discussions with Capital Credit Union, focussing particularly on:

- its ability to support our intention to make credit union membership and access to the service accessible throughout West Lothian; and
- support from community planning partners that will enable Capital and the local credit unions to increase membership among partners' staff.

Choices Loan Project

West Lothian Credit Union has been successful in securing funding from the Scottish Government's Enterprise Ready Fund. The project will provide an ethical and affordable alternative to high cost credit whether in the form of payday or doorstep loans or high overdraft charges by high street banks. The loan will be offered both to members and non-members. The money to lend out to applicants will come from members money already held in the credit union and, once repaid, this will regenerate into a perpetuating pot of funds to loan out for this type of loan. The credit union understands the need to have a "loan guarantee fund" which will be used only in the event of non-repayment of the loan. Although some monies have been committed, it is clear that more money in the Fund, allows lending more money out. The Council is committed to reducing the impact of payday lending and will support the Choices Loan project through a one-off grant of £20,000.

E. CONCLUSION

Local credit unions have a valuable and valued part to play in alleviating poverty among vulnerable people in West Lothian, through helping them save and allowing them to borrow small amounts of money for essential needs. Both effectively help vulnerable people in their common bond areas.

Non-financial support from the Council and community planning partners will allow the two local credit unions and Capital Credit Union build membership in West Lothian and increase accessibility to potential members.

F. BACKGROUND REFERENCES

None.

Appendices / Attachments : None.

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Donald Forrest
Head of Finance and Estates

Steve Field
Head of Area Services

15 April 2014



West Lothian
Council

COUNCIL EXECUTIVE

EAST OF SCOTLAND INVESTMENT FUND

REPORT BY HEAD OF PLANNING & ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of this report is to update Council Executive on the performance of the East of Scotland Investment Fund (ESIF) and to seek authority to appoint the Head of Planning & Economic Development as a Director of ESIF.

B. RECOMMENDATION

It is recommended that Council Executive:-

1. Notes the performance of ESIF;
2. Approves the appointment of the Head of Planning & Economic Development as a Director of ESIF; and
3. Amends the Scheme of Delegation to allow for the appointment of the Head of Planning & Economic Development.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; Being honest, open and accountable; Making best use of our resources; Working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Legal guidance has been sought on Board membership. No other assessments were necessary.
III Implications for Scheme of Delegations to Officers	This report makes a specific recommendation with respect to the Scheme of Delegation.
IV Impact on performance and performance Indicators	None.

V	Relevance to Single Outcome Agreement	Outcome 3 – Our economy is diverse and dynamic. West Lothian is an attractive place for doing business.
VI	Resources - (Financial, Staffing and Property)	None.
VII	Consideration at PDSP	The appointment has not been considered at a PDSP.
VIII	Other consultations	Legal Services.

D. TERMS OF REPORT

The East of Scotland Investment Fund (ESIF) was formed in 2010/11 as a company limited by guarantee, with founding and subscribing members comprising ten local authorities. The funding model consists of loans from member authorities and matching European Regional Development Funding (ERDF). West Lothian Council loaned £400,000 to ESIF and an additional £324,000 of ERDF grant was secured by the council.

ESIF works by each local authority making secured loans to viable local businesses to help with investment and job creation. Lead by council's Business Gateway service, ESIF lending has helped lever in additional private funding of over £3.5 Million to date for local firms.

West Lothian was the first local member of ESIF to lend. In the past three years, the council has made loans totalling £673,000 to local firms. Average loan value is in the range £30,000 to £40,000. Loans are secured against company assets; personal guarantees are often taken for the duration of the loan which is typically three years.

The success of the council's involvement with ESIF has seen resulted in increase in the availability of ERDF grant funds from £324,000 to £754,250. This reflects the successful lending to support 337 jobs to date and ability to create a further 98 over the next 18 months with ESIF loans.

The participation in ESIF was supported by the Development & Transport PDSP and approved by Council Executive in 2010. An ESIF Members Agreement was concluded in 2010 for the ten founding local authorities. As a result of the recent appointment of the Head of Planning & Economic Development it is necessary to appoint the postholder as a Director of ESIF. No specific delegation for this appointment exists.

E. CONCLUSION

The Council Executive is asked to note the contribution of ESIF support for sustainable economic growth in West Lothian.

The appointment of the Head of Planning & Economic Development as a Director will allow the council to continue active participation on the ESIF Board. As this appointment is principally an operational matter it is suggested that the appointment in the future is dealt with as a delegated matter.

F. BACKGROUND REFERENCES

None.

Appendices/Attachments: None.

Contact Person: Jim Henderson, Business Development Manager, tel 01506 283084,
jim.henderson@westlothian.gov.uk

Craig McCorriston

Head of Planning & Economic Development

15 April 2014



**West Lothian
Council**

COUNCIL EXECUTIVE

LINLITHGOW 3RD GENERATION SYNTHETIC PITCH PROJECT

REPORT BY HEAD OF AREA SERVICES

A. PURPOSE OF REPORT

The purpose of this report is to seek Council Executive approval for the submission of a £300,000 Cashback for Communities funding application, to the Scottish Government, for a full-size 3rd generation synthetic turf pitch at Linlithgow Leisure Centre.

B. RECOMMENDATION

It is recommended that the Council Executive:

- 1) Approves submission of the Cashback for Communities funding application, for £300,000, enclosed as appendix1 to this report;
- 2) Approves the allocation of £200,000 within the Open Space Capital programme towards the cost of this project: and
- 3) Instructs the Head of Finance and Estates to progress discussion with West Lothian Leisure to agree suitable terms to include the proposed synthetic pitch within the West Lothian Leisure lease.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; being honest, open and accountable; providing equality of opportunities; making best use of our resources; and working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	West Lothian Outdoor Sports Facility Strategy, Scottish Rugby Union and Scottish FA Facility Strategies.
III Implications for Scheme of Delegations to Officers	None.
IV Impact on performance and performance Indicators	Proposed increase in participation numbers.
V Relevance to Single Outcome Agreement	SOA 4: We live in resilient, cohesive and safe communities. SOA 7: We live longer, healthier lives and have reduced health inequalities.

VI Resources - (Financial, Staffing and Property)	£200,000 allocation within the Open Space capital programme, as set out in section D.3 of this report.
VII Consideration at PDSP	N/A
VIII Other consultations	Scottish Football Association, Scottish Rugby Union, local sports clubs, West Lothian Leisure.

D. TERMS OF REPORT

D.1 Background

An opportunity has arisen for West Lothian Council to apply to the 'Cashback for Communities' scheme, administered via the Scottish Government, sportscotland, Scottish Football Association (SFA) and the Scottish Rugby Union (SRU) for £300,000 towards a full-size, fenced and floodlit 3rd Generation synthetic turf pitch which will accommodate football training, matches and full-contact rugby.

Initial discussions with the SFA and SRU lead to the recommendation that Linlithgow is the preferred locality to receive a submission to this fund due to the strength of the football and rugby clubs in the town and the number of active participants the clubs support. Linlithgow Rose Community Football Club, Linlithgow Thistle Amateur Football Club and Linlithgow Rugby Football Club all hold West Lothian Council and relevant Governing Body club accreditation and the three clubs have a cumulative membership of 1,400 people.

At present, there is no 3rd Generation Turf facility within Linlithgow, this restricts training and competitive opportunities for local people, particularly young people. As detailed in the West Lothian Outdoor Sports Facilities Strategy, Linlithgow also operates with a deficit of two full-size natural grass pitches.

This investment would help to address these shortfalls in facility provision and provide a much needed resource for a community with a growing and active population of sports club members.

D.2 Facility Operation

Given the expertise in leisure management and facility operation provided by West Lothian Leisure and the existing support facilities present on site, it is recommended that West Lothian Leisure manages the proposed facility. Further discussion will be progressed between West Lothian Leisure, West Lothian Council, the partner clubs and the relevant governing bodies over access and pricing arrangements to ensure the local partner clubs, and their members, receive the benefits of the capital investment as detailed in the funding application.

An amendment to the West Lothian Leisure lease would be required to include the site of the proposed project. The Head of Finance and Estates would progress discussions with West Lothian Leisure and their legal representatives over this, once the location of the project site is known.

D.3 Funding

The total budget requirement for this project is estimated to be £650,000, as detailed on page 8 of appendix 1.

The following funding summary details the known funding sources for the project:

- West Lothian Council - £200,000;
- Cashback for Communities fund - £300,000;
- Scottish Football Partnership - £50,000;
- **Total - £550,000.**

Further discussion is being progressed with the Scottish FA and sportscotland over the projected funding deficit and sources to address that. In addition, West Lothian Leisure has advised that an allocation to the project will be considered with a paper to be presented to the West Lothian Leisure Board for consideration on 24 April 2014.

The £200,000 West Lothian Council capital funding would be sourced from an existing, approved project in the Open Space Capital programme (the Doomsdale Park Project). This project aimed to deliver a full-size natural grass pitch on the Doomsdale Park site. Feasibility studies identify that ground conditions and topography at this site are unsuitable. An alternative site for the proposed pitch at the neighbouring Listloaning Park has also been the subject of a feasibility study. This option is also estimated to be unaffordable within the £200,000 budget allocation and the revenue consequence of investing in a pitch on a known flood plain does not represent value for money. It is concluded that a £200,000 investment to achieve a £650,000 synthetic turf facility, which provides significantly more hours of use represents better value for money for West Lothian Council and a better facility for local people.

E. CONCLUSION

An opportunity has arisen for West Lothian Council to apply to the 'Cashback for Communities' scheme, administered via the Scottish Government, sportscotland, Scottish Football Association (SFA) and the Scottish Rugby Union (SRU) for £300,000 towards a full-size, fenced and floodlit 3rd Generation synthetic turf pitch which will accommodate football training, matches and full-contact rugby.

It is proposed that West Lothian Council allocates £200,000 to this project from the existing Doomsdale Park project to achieve much better value for money for West Lothian Council and the local community.

There will be no revenue consequence for this project assuming Council Executive agrees that West Lothian Leisure should operate the facility under an amendment to the existing West Lothian Leisure Lease

F. BACKGROUND REFERENCES

None

Appendices/Attachments: One

Appendix 1 – Draft 'Cashback for Communities' application form.

Contact Person: Keir Stevenson – Sport and Outdoor Education Coordinator;

Tel – 01506 282775; E-mail – Keir.Stevenson@westlothian.gov.uk.

Steve Field
Head of Area Services

Date: 15 April 2014



Sport Facilities Fund Projects Over £100,000

Large Project Full Application

Applicant:

Project title:

Sport Facilities Fund: Projects Over £100,000

Large Project Full Application Form

Introduction

This full application form should be used for projects with a value over £100,000 which have successfully progressed from the Outline Application Stage. Before completing this application please refer to the current Sports Facilities Fund Guidelines document.

www.sportscotland.org.uk/FacilitiesGuidelines.

Contents

Section 1	Applicant details
Section 2	Project details
Section 3	Financial details
Section 4	Sports impact
Section 5	Operational details
Section 6	Documentation
Section 7	Certification
Additional notes	

Completing the application form

This form has been created as a fillable PDF form. In order to complete this document electronically you will need Adobe Reader (version 8.1) or newer. This file may then be completed and saved.

If you are not using the Adobe Reader, either on a Mac or a PC, please do so. The latest version can be downloaded from <http://get.adobe.com/uk/reader/>.

Mac users – please note: If you are using a Mac to complete the form, please ensure that you have opened the document in Adobe Reader (version 8.1) or newer and not the Mac default 'Preview' application.

If you have any problems with the form request a hard copy from facilities@sportscotland.org.uk.

Please submit your application via email by clicking the EMAIL button at the end of the form and sending it to facilities@sportscotland.org.uk including scanned copies of your supporting documents. You may alternatively post the full application to the address noted below.

sportscotland
Doges
Templeton on the Green
62 Templeton Street
GLASGOW
G40 1DA
Tel: 0141 534 6500
Fax: 0141534 6501
www.sportscotland.org.uk
Facilities@sportscotland.org.uk

Data Protection

sportscotland will use and process information provided in accordance with the requirements of the Data Protection Act 1998. The information you provide us with may be held on files, both paper and electronic. We will use this information to process applications and grants, to prepare statistics and to monitor and evaluate the effectiveness of investments. Please note that by signing the application form you are giving explicit consent for the data collected about you and/or your organisation to be recorded, processed and used for the purposes outlined above or for any other legitimate reason.

1. Advice notes

1.1 Please ensure that your organisation is eligible to apply for an award. See the Guidelines for eligibility criteria.

Please provide your normal business address.

1.2 Please attach a copy of your governing documents.

1 Applicant details

If these details are identical to those provided at the Outline Stage of your application please tick each section as appropriate or update the information in the boxes provided.

1.1 The applicant body

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

Name of the applicant organisation

Number of years organisation been in existence

Contact name

Position within organisation

Address for correspondence

Postcode

Tel no (Work)

Tel no (Home)

Tel no (Mobile)

E-mail address

Web address

1.2 What is the status of your organisation?

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

☐ Local voluntary or community sports club

☐ Community sports hub

☐ Trust

☐ National governing body of sport

☐ Community Amateur Sports Club

☐ Charity (please provide Scottish Charity Number):

☐ Other (please specify):

☐ Company limited by guarantee

☐ Company limited by shares

☐ Local Authority

☐ Statutory body

☐ Community Interest Company

1.3 Please note your relevant status within each organisation eg. Member, Affiliated, Chartered, Quality Mark, Club Mark, Community Club

1.3 Membership

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

Are you a member of any of the following?

- ☐ Scottish governing body
- ☐ Local Sports Council
- ☐ Other

If yes to any of the above, please specify name and status

1.4 Current membership numbers

	Male	Female	Total
Playing members under 16			
Playing members over 16			
Non playing members			
Total			

2. Advice notes	<div>2Project details</div> <div>2.1Is your project referred to in a Local Authority or Governing body Facility Strategy or any other strategic document?</div> <div>IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK</div> <div></div>
	<div>2.2Project Location</div> <div>WE ANTICIPATE THAT THE PROJECT LOCATION WILL BE IDENTICAL TO THAT PROVIDED AT THE OUTLINE STAGE OF YOUR APPLICATION – PLEASE TICK TO CONFIRM. IF THIS HAS ALTERED FROM YOUR OUTLINE APPLICATION WE REQUIRE A DIFFERENT OUTLINE APPLICATION AS THIS IS CONSIDERED A DIFFERENT PROJECT.</div>
	<div>2.3What is your project?</div> <div>WE ANTICIPATE THAT THE SCOPE OF YOUR PROJECT WILL BE IDENTICAL TO THAT PROVIDED AT THE OUTLINE STAGE OF YOUR APPLICATION – PLEASE TICK TO CONFIRM. IF THIS HAS ALTERED FROM YOUR OUTLINE APPLICATION WE REQUIRE A DIFFERENT OUTLINE APPLICATION AS THIS IS CONSIDERED A DIFFERENT PROJECT.</div>
	<div>2.4Description of all existing facilities</div> <div>WE ANTICIPATE THAT THE EXISTING FACILITIES WILL BE IDENTICAL TO THOSE DESCRIBED AT THE OUTLINE STAGE OF YOUR APPLICATION – PLEASE TICK TO CONFIRM.</div>
2.5 Please attach plans of your proposal and specification	<div>2.5Description of proposed facilities</div> <div>IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK</div> <div>We anticipate this will be identical to that provided at the Outline Stage of your application – please tick above to confirm. If the proposal has been refined or been developed with the assistance of the sportscotland facilities team please outline the new proposal below:</div> <div></div>

2.6 What timescale are you working to?

Proposed site start Month Year

Anticipated contract length Weeks

2.7 If yes, you must have planning in principle for your project before your application can be considered. If no, you must provide written confirmation from the local authority that planning permission is not required.

Please provide a copy of the consent.

2.7 Planning permission

Is planning permission required?

☐

Yes

☐

No

Please provide planning application reference number:

Is your project on the site of existing playing fields?

☐

Yes

☐

No

If yes, please provide details and confirm whether your project will result in a reduction in the number of pitches on the site.

2.8 We require a copy of a solicitor's letter confirming the applicants permission to build on the land/ownership of the facility.

2.8 Security of tenure of project site/facilities

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

Present arrangement (please indicate)

☐

Owned

☐

Leased

Lease expiry date

☐

Hired

Hire term

☐

Access agreement

Length

Expiry date

Proposed arrangement (please indicate)

☐

Owned

☐

Leased

Lease expiry date

☐

Hired

Hire term

☐

Access Agreement

Length

Expiry date

If you do not own the leasehold, licence or freehold for the existing/proposed facilities, who does/will and what is their connection to your organisation?

2.8 We recommend that you consult your legal advisors to check that there are no burdens or covenants over the project site that may affect the proposed development.

2.9 Are there any burdens or conditions over the project site?

Please provide details

2.9 Please provide details of the person responsible for managing the project.

2.10 Project management

Please provide details of the person responsible for managing the project

Name

Organisation

Professional qualification (if any)

Relationship with club/employed professional

Phone number

E-mail address

2.11 Please provide details and describe the services you are using. For instance, the services of an architect, quantity surveyor, civil/structural engineer, Pitch or Leisure Consultant.

2.11 Professional and technical services

Please provide details and describe the services you are using. For instance, the services of an architect, quantity surveyor, civil/structural engineer, Pitch or Leisure Consultant

Name

Organisation

Professional qualification (if any)

Relationship with club / employed professional

Phone number

E-mail address

Name

Organisation

Professional qualification (if any)

Relationship with club / employed professional

Phone number

E-mail address

Name

Organisation

Professional qualification (if any)

Relationship with club / employed professional

Phone number

E-mail address

Name

Organisation

Professional qualification (if any)

Relationship with club / employed professional

Phone number

E-mail address

3. Advice notes

3.1 Before applying we strongly recommend that you seek the advice of Customs and Excise to determine the extent (if any) of VAT recovery.

3.3 Remember to include VAT charges if you cannot recover or avoid them. Please also attach a full breakdown of the project contract costs.

3.4 Please provide a copy of any quotations or estimates you have obtained for your project. Please do not formally tender your project until an award is offered.

3 Financial details

3.1 Is your organisation registered for VAT?

☐

Yes

☐

No

If yes, please provide VAT registration number:

3.2 VAT recovery

What % VAT recovery will be applicable to your project?

 %

3.3 Cost breakdown

Please summarise the costs below in as much detail as you consider appropriate.

Category	Cost (£)	% of TCC
New build		
Improving/upgrading/extending existing facility		
Floodlighting		
Major items of non-personal sporting equipment		
Total contract cost		
Professional fees and expenses		
Other (please specify)		
Contingency		
Inflation		
VAT		
Total project cost		

3.4 How did you arrive at the above cost?

☐

Detailed costing

☐

Quotation(s)

☐

Other (please specify)

3.5 How much sportscotland funding are you applying for?

In this application

£

3.6 Please enter amounts in appropriate columns and attach a letter of support, or other documentary evidence, for every confirmed source of funding.

3.6 Funding summary

Funding sources	Grant (G) Loan (L)	Funding in place £	Promised £	Applied for £	Total £
Organisation's cash					
Organisation's in kind					
sportscotland					
Others:					
Shortfall					
Total					

3.7 If you plan to contribute in-kind, for example by providing voluntary labour, please describe the type of contribution(s) to be made and you estimate of its (their) value.

3.7 Your in-kind contribution

Type of contribution in-kind	Estimated value
	£
	£
	£
	£
	£
Total	£

Has the value of the work relating to any contribution(s) in-kind been included in the project costs?

☐

Yes

☐

No

3.8 Please provide figures relating to your organisation's financial position as shown in its most recent balance sheet.

Please provide a copy of your latest and last two years annual accounts and a copy of a current bank statement(s).

3.8 Financial position (not required from statutory authorities)

(a) Fixed assets	£
(b) Current assets	£
(c) Current liabilities	£
(d) Net current assets/(liabilities) (b - c)	£
(e) Long term liabilities	£
(f) Net assets (a + d - e) Total	£

3.9 Details should include amount of loan(s), lender(s), length of security period.

3.9 Security

Is your existing facility (or part thereof) used as security for an existing loan(s)?

☐ Yes ☐ No

If YES, please provide details

Will the new/enhanced facility be used as security for a loan(s)?

☐ Yes ☐ No

If YES, please provide details

3.10 Please complete summary of funding from all sources, taking care to ensure that the total agrees with the estimated total costs.

3.10 If the project is to be part-funded by loans and mortgages:

Is the organisation empowered to borrow to the extent planned?

☐ Yes ☐ No

Is your property already subject to a mortgage or similar charge?

☐ Yes ☐ No

3.11 Cost of borrowing

	Loan repayment (£)	Interest (£)
Year 1		
Year 2		
Year 3		

3.12 Please indicate the last two years and current income and expenditure position (where appropriate) as shown in your annual accounts, and summarise your forecasts for the first three years of operation. Please include loan repayments and interest but exclude all capital costs and funding.

3.12 Operating income & expenditure

	Income (£)	Expenditure (£)	Net (£)
2 years ago			
Last year			
Current position			
Year 1			
Year 2			
Year 3			

3.13 What assumptions have been made in preparing your forecast?

--

4. Advice notes

4 Sports impact

If these details are identical to those provided at the Outline Stage of your application please tick each section as appropriate or update the information in the boxes provided.

4.1 How does your project fit with the objectives of sportscotland to meet the demands of your sport?

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

- ☐ To increase capacity of the facility
- ☐ To increase quality of the facility
- ☐ To increase the availability
- ☐ To develop performance sport facilities

4.2 Please provide details of youth, active schools, development programmes or initiatives that support this facility development.

4.2 What programmes do you have in place to develop your organisation?

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

How will this facility development support these?

Please attached this as an appendix if you require more space.

Proposed profile of your club(s)

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

Please indicate above if these remain identical to those provided at the Outline Stage of your application.

If any of this information has changed please update that information below:

Sport(s)	No. of Teams	Age Groups of Teams	Level	No. in each team	Hours per week

4.4 Please record the number of uses per week. If 1 member uses the facility three times a week count this as 3 uses each week.

4.4 Number of uses

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

How many active participants per week do/did use your facility? How many do you anticipate will use your facility in years 1, 2 and 3?

	Previous	Last year	Current	Year 1	Year 2	Year 3
Under 16 – Male						
Under 16 – Female						
Adult – Male						
Adult – Female						

How many days per week will the proposed facility be available for sports participation?

How many weeks per annum will the proposed facility be available for sports participation?

4.5 Please ensure you identify the level of each group of coaches.

4.5 Number of coaches

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

	Previous	Last year	Current	Year 1	Year 2	Year 3
Unqualified						
Qualified Level:						
Qualified Level:						
Qualified Level:						
Qualified Level:						

4.6 On average, how many coaching hours per week are offered, and/or are likely to be offered to, adults (ie 16+) and also Under-16s?

4.6 Average coaching hours per week

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

	Current	Future
Adults		
Under-16s		

4.7 Proposed programme of use

Please summarise thenumber of hours allocated to each user group. ie: club use, school use, pay and play, womens development and youth developmentclasses, individual coaching, and provide full details in support of your application.

	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
6am							
7am							
8am							
9am							
10am							
11am							
12am							
1pm							
2pm							
3pm							
4pm							
5pm							
6pm							
7pm							
8pm							
9pm							
10pm							

4.8 What categories of use apply/will apply?

	Current	Future
Pay & Play		
Bookings in advance by individuals		
School		
Community		
Single bookings by any club		
Regular bookings by any club		
Bookings by a limited number of clubs		
Restricted to members of one club only		

4.9 Programme

Number of hours	Current weekdays	Current weekend	Future weekdays	Future weekends
Club use				
Schools				
Development work/classes				
Pay & Play				

What is your rationale for this allocation of facility time? If you have an agreed bookings policy setting out, for example, priorities, restrictions, etc; please provide brief details.

4.10 Please describe what links you plan to establish/ have established with the sports programmes and initiatives operated by the Local Authority/ Governing Body and its associates/ partners and provide the name(s) and department(s) of your contact(s) in the Local Authority/Governing Body.

4.10 Project Integration

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

What are your links with your Local Authority/National Governing Body for Sport?

☐ Local Authority ☐ Governing Body

Please specify & contact details:

5 Operational details

5.1 Current and proposed charges

IF THE DETAILS BELOW ARE IDENTICAL TO THOSE PROVIDED AT THE OUTLINE STAGE PLEASE TICK ☐

Please indicate above if these remain identical to those provided at the Outline Stage of your application. If any of this information has changed please update that information below:

	Current			Future		
	Male adult	Female adult	Junior U16	Male adult	Female adult	Junior U16
Entrance fee/admission charge						
Joining fee (for membership)						
Annual subscription						
Playing charge						
Other subs/levies (specify below)						

Other subs/levies:

5.2 We need to be satisfied that equality of opportunity is observed in all respects ie access, pricing policy & voting rights. Your constitution should include an 'open to all clause'.

5.2 Does your club operate an equal opportunities policy?

☐ Yes ☐ No

If no, please give details:

5.3 Do you, for example, limit the number of juniors (U-16)?

5.3 Are there any restrictions on the numbers of members in each category of membership?

☐ Yes ☐ No

If yes, please give details:

5.4 Protected groups under legislation include: age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership, political or other opinion.

5.4 What initiatives do you have in place to actively seek members from under represented groups of your community?

5.5 Adjustments may include those to cater for: Ambulant Disabled; Wheelchair users; Visually impaired; Hearing impairment; Learning disabilities.

5.5 Adjustments/provision for disabled participants

As the service provider of a public facility you have a duty under the 2010 Equity & Inclusion Act to make reasonable adjustments/provision to ensure that disabled participants are able to use your facility. What steps have you taken to comply with this legislation?

5.6 Please include details of posts, numbers and shifts, e.g. 8 x leisure attendants, weekdays 0800-1500 hours.

5.6 Management and staffing structure

Please provide details of your organisation's management and staffing numbers.

5.7 For example Quest, ISO 9000, Chartermark, Investors in People.

5.7 Quality procedures

Please provide details of operational procedural documentation/systems currently in operation or proposed, such as quality management systems, booking procedures, letting policy, fitness room policies and guidelines, etc.



6 Documentation

Please confirm that you are enclosing the following documents in support of this application

- ☐ **List of names & full contact details of office bearers**
- 2 ☐ **Dimensioned design drawings**
 - ☐ **Accommodation schedules**
 - ☐ **Project brief (for projects costing over £250,000)**
 - ☐ **Planning in principle or full planning consent & stamped approved drawings**
 - ☐ **Evidence of security of tenure of project site**

Owned sites require copy of title deed documentation and solicitors letter confirming ownership. Or evidence of fully-signed lease, rental or access agreement
- 3 ☐ **Quotations or estimates**
 - ☐ **BCIS specification of works**
 - ☐ **Income and expenditure projection for the first three years of the facility**
 - ☐ **Latest & previous two years annual accounts**
 - ☐ **Current bank statement**
 - ☐ **Business plan**
- 4 ☐ **Programme of use**
- 5 ☐ **Management or access agreements**
 - ☐ **Child protection policy**

Please note that we will not be liable, nor will we accept any liability, for any costs incurred by the applicant, either on the project or in making this application, irrespective of its outcome.

7.1 Endorsement

Your application must be endorsed and countersigned by an authorised representative of your organisation (e.g. President, Treasurer, Secretary) other than the main contact person referred to in Section 1.1, page 1, or the signatory to the applicant's statement on this page.

I endorse this application, confirm that it has been authorised by the organisation, and certify that to the best of my knowledge, the information provided is truthful and accurate.

Signature

Name

Position

Date

Contact tel no.

Email address

7.2 Applicant's statement

Read and sign this statement. This is a legally binding declaration.

I confirm and certify on behalf of this applicant that:

*I am completing this application on behalf of the organisation named in question 1.1 and that is has read the Guidelines, including **sportscotland's** obligations under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 and formally authorised this application to **sportscotland**.*

The project which is the subject of this application has not been commenced by way of letting a contract or start on site

On completion of the project on-one will be denied the right to equal access to our facilities on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex; sexual orientation, political or other opinion.

*To the best of my knowledge all information provided in this application and its supporting documentation is truthful and accurate. I understand that any misleading statements given at any time will render this application invalid. I undertake to inform **sportscotland** fully and immediately if any changes in circumstances require us to amend the application or the supporting material.*

I certify that I have made full and complete disclosure of all relevant facts relating to the application, or its subject matter, whether supportive of the application or otherwise.

Signature

Name

Position

Date

Home tel no.

Business tel no.

Mobile no.

The completed form and supporting documentation should be sent to:
sportscotland, Doges, Templeton on the Green, 62 Templeton Street, Glasgow, G40 1DA

Additional notes

Please use the section and question numbers for our reference.

Additional notes

Please use this section if you could not fit all relevant information in the boxes provided.



West Lothian
Council

COUNCIL EXECUTIVE

SCOTTISH GOVERNMENT CONSULTATION - CARERS LEGISLATION: CONSULTATION ON PROPOSALS

REPORT BY HEAD OF SOCIAL POLICY

A. PURPOSE OF REPORT

To advise the Council Executive of the consultation relating to the Scottish Government's proposal for the development of Carers Legislation.

B. RECOMMENDATION

It is recommended that the Council Executive:

1. Notes the current consultation relating to the development of Carers Legislation;
2. Considers the draft response and agrees that it is submitted to the Scottish Government.

C. SUMMARY OF IMPLICATIONS

I Council Values	<ul style="list-style-type: none">• Focusing on our customers' needs• Being honest, open and accountable• Providing equality of opportunity• Making best use of resources• Working in partnership
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	<ul style="list-style-type: none">• The Social Care (Self-directed Support) (Scotland) Act 2013• Caring Together and Getting it Right for Young Carers.• Children and Young People (Scotland) Bill• The Public Bodies (Joint Working) Scotland Bill• Talking Points, Personal Outcomes Approach, Joint Improvement Team, 2012• Getting it Right for Every Child Education (Additional Support for Learning)(Scotland) Act 2004
III Implications for Scheme of Delegations to Officers	None

IV	Impact on performance and performance Indicators	Performance indicators have been determined in the Carers and Young Carers' Strategies and will be reviewed in light of findings of the consultation.
V	Relevance to Single Outcome Agreement	Our children have the best start in life and are ready to succeed Older people are able to live independently in the community with an improved quality of life We live longer, healthier lives and have reduced health inequalities
VI	Resources - (Financial, Staffing and Property)	
VII	Consideration at PDSP	The draft response was considered by Social Policy PDSP on 6 th March, 2014 when it was agreed that the policy be submitted to the Council Executive for approval.
VIII	Other consultations	This consultation has been distributed to interested parties across the council, the community and third sector partners.

D. TERMS OF REPORT

D1 Background

The Scottish Government has committed to supporting unpaid carers and young carers through the national carers and young carers' strategies, Caring Together and Getting it Right for Young Carers.

According to the 2011 Census, over 9% of people in Scotland identify themselves as carers providing unpaid care to family or friends. The care provided by unpaid carers is estimated to save the health and social care services over £10 billion every year in Scotland.

Ministers have made it clear that they plan to accelerate the pace of change so that both adult carers and young carers are fully supported and achieve better outcomes as a result. They have indicated that they see a crucial role for new carers' legislation in raising the bar and providing further impetus to this important agenda.

D2 Consultation Overview

A consultation has been launched which sets out the Scottish Government's proposals on how to improve outcomes for carers and young carers across Scotland.

It seeks the views of carers, young carers, local authorities, health boards and the Third Sector on proposed legislative measures that will provide further support to carers, young carers and the people they care for.

This consultation provides a general overview of the proposed legislation but does not, nor does it aim to, provide a comprehensive description of the policy development and practical implementation that will be required to underpin change.

Should the legislation proposed in this consultation pass through the Scottish Parliament the Scottish Government will, with input from a wide range of stakeholders, develop statutory guidance to support the changes that will be enabled by the new legislation set out here. The guidance will provide further important detail to the provisions in the new carers' legislation.

It is the aim of the Carers' Legislation to accelerate the pace of change in supporting carers and to bring a more consistent approach across all local authority and health board areas.

The following areas are explored in the consultation document:

- The Carer's Assessment (the Carer's Support Plan)
- Information and Advice
- Support to Carers (other than information and advice)
- Stages and Transitions
- Carer Involvement:
 - Service Design and Delivery
 - Care Planning and Support
- Planning and Delivery:
 - Carers Strategies
 - Diversity and Equality in Provision

D3 Consultation Process

In formulating the draft response Council Officers have engaged with Carers of West Lothian, West Lothian Council staff, carers and young carers.

E. CONCLUSION

West Lothian Council is committed to supporting Carers and Young Carers, this is demonstrated by the development and implementation of the West Lothian Carers and Young Carers Strategies. In framing this consultation response consideration has also be given to the Carers Rights Charter due to be published mid-year and the duties already placed on the council.

F. BACKGROUND REFERENCES

Link to Scottish Government consultation

www.scotland.gov.uk/Resource/0044/00442248.pdf

Appendix : Appendix A – Draft Consultation Response

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Jennifer Scott

Head of Social Policy

Date:

15th April 2014

Consultation on Carers Legislation



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

West Lothian Council

Title Mr ☐ Ms ☒ Mrs ☐ Miss ☐ Dr ☐ **Please tick as appropriate**

Surname

Scott

Forename

Jennifer

2. Postal Address

West Lothian Council

West Lothian Civic Centre

Almond South Road

Livingston,

Postcode EH54 6FF

Phone

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

☐

Please tick as appropriate

☒

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

☒ **Yes** ☐ **No**

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick ONE of the following boxes

Please tick as appropriate

☒ Yes ☐ No

Yes, make my response, name and address all available ☒

or

Yes, make my response available, but not my name and address ☐

or

Yes, make my response and name available, but not my address ☐

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

☒ Yes

CONSULTATION QUESTIONS

The Carer's Assessment: Carer's Support Plan

Question 1: Should we change the name of the carer's assessment to the Carer's Support Plan?

☐ Yes

☒ No

Comments:

We acknowledge that the use of the term Carers' Assessment could be perceived as having negative connotations however, we would have concerns about changing the name of Carers Support Plan.

Our key concerns include:

- The proposed change in name of the document not reflecting its function, an assessment would still be required as the Council will still have a duty to assess
- The name would appear to predetermine the outcome, i.e. that support will be

provided when in fact the completion of a Carers Support Plan as described in the consultation document would still be an assessment and part of this process would have to be to determine eligibility.

Rather than changing the name of the document we would suggest that priority should be given to finding ways to engage with carers to discuss with them the purpose of assessment and to undertake this in partnership. In West Lothian we have recently adopted an outcomes focused approach to assessment in which we seek work in partnership with the people who use our services with a view to assessing and identifying their own needs and outcomes. .

West Lothian remains committed to supporting carers and finding ways to promote access to services and support in their caring role.

Question 2: Should we remove the substantial and regular test so that all carers will be eligible for the Carer's Support Plan?

☐ Yes

☒ No

Comments:

We believed that the substantial and regular test should not be removed to ensure that all carers eligible for the Carers' Support Plan.

West Lothian Carers' Strategy currently uses broad criteria to determine whether carers are eligible for a Carers' Support Plan. These have been developed in consultation with carers, health and voluntary sector colleagues and include the following:

- Are you the main or only carer?
- Is the cared for person at risk if you were unable to provide the support?
- Do you have regular (daily/weekly) contact with the person you care for?
- Do you require support to sustain your caring role?
- Do you live with/care for a vulnerable adult. A vulnerable adult is a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or explanation.

It is anticipated that the worker would discuss these indicators/criteria with the carer and that the carer would be able to discern their own eligibility for an assessment. This would hopefully encourage a greater level of involvement and flexibility for carers.

Question 3: Should we remove that part of the existing carer assessment process whereby the cared-for person is a person for whom the local authority must or may provide community care services/children's services?

☐ Yes

☒ No

Comments:

In West Lothian, in line with the National Carers' Strategy, we recognise the important role that carers undertake and are committed to ensuring that there is an opportunity for all carers to access suitable resources and support.

Question 4: Should we introduce two routes through to the Carer's Support Plan – at the carer's request and by the local authority making an offer?

☐ Yes

☐ No

Comments:

From a West Lothian perspective this is not applicable as there are currently two routes through to the Carer's Assessment/Support Plan – at the carer's request and by Council making an offer.

The West Lothian Carers Strategy 2013-2015 highlights Council's commitment to improving the uptake of carer assessments/ support plans and working to ensure that health and social care staff understand the purpose and value of a carers assessment/ support plan, eligibility, barriers to uptake and the local referral process.

As part of the Revised Shared Assessment, there is an option to refer carers to Carers Of West Lothian for information and support

It is hoped this initiative should lead to an uptake in the number of carers' assessments/support plans.

Question 5: Should we remove from statute the wording about the carer's ability to provide care?

☐ Yes

☒ No

Comments:

We believe that the wording about the carer's ability to provide care should not be removed from the statute. West Lothian Council's performance management indicator is defined as "is the carer willing and able to continue caring?" This terminology is used to determine the carer's wellbeing not their capability and focuses on ensuring that the carers is both mentally and physically able to continue caring.

Question 6: Should we introduce a duty for local authorities to inform the carer of the length of time it is likely to take to receive the Carer's Support Plan and if it exceeds this time, to be advised of the reasons?

☐ Yes

☒ No

Comments:

In West Lothian we do not believe that there needs to be a duty imposed on local authorities to inform carers of the length of time it is likely to take to receive the Carers' Assessment/ Support Plan.

It is currently custom and practice that carers are informed of the length of time it is likely to take to receive carers' support.

It should be noted that there is no additional resource provision to cover this and if the uptake was considerable, this would have a direct effect on resources and would make it difficult to determine the lead time to assessment.

Question 7: How significant an issue is portability of assessment for service users and carers?

Comments:

We acknowledge that the portability of assessment could be an issue for service users and carers. We would suggest that there should be consistency across all authorities in relation to this matter.

Question 8: Should the Scottish Government and COSLA with relevant interests work together to take forward improvements to the portability of assessment?

☒ Yes

☐ No

Comments:

Yes, we agree that the Scottish Government and COSLA should work together to give guidance on how to improve the portability of assessment.

Information and Advice

Question 9: Should we introduce a duty for local authorities to establish and maintain a service for providing people with information and advice relating to the Carer's Support Plan and support for carers and young carers?

☐ Yes

☒ No

Comments:

We do not agree that a duty should be placed on local authorities to establish and maintain a service for providing people with information and advice relating to the Carers Assessment/Support Plan and support for carers and young carers.

We recognise the importance of ensuring that carers have access to the appropriate information and commission Carers of West Lothian to deliver this service. Council is also committed to the development and endorsement of the Carers Rights Charter is part of the West Lothian Carers Strategy.

Question 10: Should we repeal section 12 of the Community Care and Health (Scotland) Act 2002 about the submission of Carer information Strategies to Scottish

Ministers, subject to reassurances, which are subject in turn to Spending Review decisions, about the continuation of funding to Health Boards for support to carers and young carers?

☐ Yes

☒ No

Comments:

We expect that this issue will be resolved by the integration of health and social care.

Support to Carers (other than information and advice)

Question 11: Should we introduce a duty to support carers and young carers, linked to an eligibility framework?

☐ Yes

☒ No

Comments:

We accept that there is a responsibility on local authorities to support carers and young carers linked to an eligibility framework, however we do not believe that this should be a duty to be placed on Local Authorities.

There is already an eligibility framework in place for carers linked to The West Lothian Carers Strategy and the Young Carers Strategy, which was developed by a multi-agency partnership which represented the interests of carers and young carers.

Question 12: Alternatively, should we retain the existing discretionary power to support carers and young carers?

☒ Yes

☐ No

Comments:

We believe that the existing discretionary powers to support carers and young carers should be retained.

Question 13: Should we introduce a duty to provide short breaks?

☐ Yes

☒ No

Comments:

We recognise that short breaks from caring can be part of the overall support that families and carers need to help them care for a family member, partner or friend. Following a consultation with carers of people with dementia, a flexible short breaks scheme has been implemented, providing a mechanism for allowing carers to arrange short breaks which

best suit their needs as well as those for the person they care for. It should be noted that not all carers sought to access short breaks from care instead finding that other intervention provided them with the appropriate support.

However we do not believe that there should be a duty to provide short breaks but that it should be part of a menu of support available to carers.

Stages and Transitions

Question 14: Should we issue statutory guidance on the Carer's Support Plan which will include guidance for those undertaking the Carer's Support Plan on managing stages of caring? This would apply to adult carers only. (For young carers, practice guidance will be developed to support management of a Child's Plan through the stages of caring).

☒ Yes

☐ No

Comments:

This practice is already in place in West Lothian.

Question 15: Should new carers' legislation provide for young carers to have a Carer's Support Plan if they seem likely to become an adult carer? Any agreed support recorded in the Carer's Support Plan would be put in place after the young carer becomes a (young) adult carer.

☒ Yes

☐ No

Comments:

This practice is already in place in West Lothian.

Carer Involvement

Question 16: Should there be carer involvement in the planning, shaping and delivery of services for the people they care for and support for carers in areas outwith the scope of integration?

☒ Yes

☐ No

Comments:

This is the current practice in West Lothian.

Question 17: Should we make provision for the involvement of carers' organisations in the planning, shaping and delivery of services and support falling outwith the scope of integration?

☒ Yes

☐ No

Comments:

This is the current practice in West Lothian

Question 18: Should we establish a principle about carer and young carer involvement in care planning for service users (subject to consent) and support for themselves in areas not covered in existing legislation?

☒ Yes

☐ No

Comments:

Carer and young carer involvement in care planning for service users is a principle already imbedded in practice in West Lothian.

Question 19: What are your views on making provision for young carer involvement in the planning, shaping and delivery of services for cared-for people and support for young carers?

Comments:

We believe that this is essential and is therefore the current practice in West Lothian.

Planning and Delivery

Question 20: Should we introduce statutory provision to the effect that a local authority and each relevant Health Board must collaborate and involve relevant organisations and carers in the development of local carers strategies which must be kept under review and updated every three years?

☐ Yes

☒ No

Comments:

West Lothian Council already works collaboratively with relevant organisations and carers in the development of our local carers strategies – this is evidence in the development of both the Carers and Young Carers Strategy. We therefore believe that this does not need to be a statutory provision.

Question 21: Should we introduce statutory provision to the effect that local authorities with Health Boards must take steps to ensure, in so far as is reasonably practicable, that a sufficient range of services is available for meeting the needs for support to carers and young carers in the area?

☐ Yes

☒ No

Comments:

We recognise that Carers and Young Carers require a range of support to meet their individual needs and strive to ensure that this is available however we do not agreed that a statutory provision should be made in this instance.

Identification

Question 22: Should there be no legislative provision for GPs or local authorities to maintain a Carers Register in order to support the identification of carers?

☒ Yes

☐ No

Comments:

West Lothian Council already maintains a Carers Register and will continue to do so.

Question 23: Should the Scottish Government ensure that good practice is widely spread amongst Health Boards about the proactive use of Registers of Carers within GP practices?

☒ Yes

☐ No

Comments:

N/A

Question 24: Should the Scottish Government ask Health Boards to monitor compliance with the core contractual elements of the GP contract?

☒ Yes

☐ No

Comments:

N/A

Carer and Cared-for Person(s) in Different Local Authority Areas

Question 25: What are the views of respondents on the lead local authority for undertaking the Carer's Support Plan and agreeing support to the carer where the carer lives in a different local authority area to the cared-for person(s)?

Comments:

We believe that this lead local authority should be that in which the cared for person(s)

lives.

Question 26: What are the views of respondents on which local authority should cover the costs of support to the carer in these circumstances?

Comments:

We believe that the lead local authority should meet the costs of the support to the carer.

Question 27: Should the Scottish Government with COSLA produce guidance for local authorities?

☒ Yes

☐ No

Comments:

West Lothian Council would welcome the production of guidance.



West Lothian
Council

COUNCIL EXECUTIVE

MEDICATION POLICY; SOCIAL POLICY

REPORT BY HEAD OF SOCIAL POLICY

A. PURPOSE OF REPORT

To advise Council Executive of revisions to the policy on the Management of Medication in social care services in West Lothian.

B. RECOMMENDATION

The Council Executive is asked to:

1. Approve the revised policy on the Management of Medication.
2. Agree that the policy will be reviewed every three years

C. SUMMARY OF IMPLICATIONS

I Council Values

- Focusing on our customers' needs
- Being honest, open and accountable;
- Making best use of our resources
- Working in partnership

II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)

- Public Services Reform (Scotland) Act 2010
- Adults with Incapacity (Scotland) Act 2000
- Corporate Plan 2013 – 17: Delivering Positive Outcomes and Early Interventions for Early Years; Improving the quality of Life for Older People; Delivering Positive Outcomes on Health

III Implications for Scheme of Delegations to Officers Nil

IV Impact on performance and performance Indicators

% children and YP feeling safe

% children and YP feeling cared for

% community Care service users feeling safe

V	Relevance to Single Outcome Agreement	Linked to SOA: We live longer healthier lives.
VI	Resources - (Financial, Staffing and Property)	Nil
VII	Consideration at PDSP	The Medication Management Policy was considered by Social Policy PDSP on 6 th March, 2014 when it was agreed that the policy be submitted to the Council Executive for approval.
VIII	Other consultations	Medication Advisory Group NHS Lothian Unison Operational Managers Relevant Trade Unions

D. TERMS OF REPORT

Background

The previous Community Care Medication Management Policy was approved by the Council and implemented in January 2009. The approved policy recommended the establishment of a Medication Advisory Group, (MAG) comprising representation from operational managers within the Council and related professionals from Health. The remit of that group was to oversee practice developments and ensure continuing compliance with the policy.

While the policy outlines the overarching principles for all service areas it is also supported by detailed operational guidance which requires to be customised for different services areas depending on the delivery model. This structure supports an approach which allows for operational guidance to be developed and revised responsively, while still remaining compliant with the overarching policy framework.

Nevertheless there have been some key developments since the policy was first approved;

Further guidance was issued by the Care Inspectorate in relation to Medication Management in registered care settings for Children and young People in 2011 and again for adult care settings in 2012.

The council's insurer's commissioned an independent audit of Medication Management, the scope of which included not only the content of the policy and procedural guidance but also overall deployment and compliance. The report was presented to the Council's Governance and Risk Board in November 2013, where it was noted that there were no requirements and that the overall score for compliance with policy and procedure was 94%. No areas of high risk were identified.

The revised policy framework takes account of new guidance and audit recommendations as well as recommendations from key professionals in health. The key changes are;

- The overarching medication policies for Children and Families and Community Care services have been combined to better facilitate document control
- The inclusion in the policy of a list of key roles and responsibilities particularly in relation to the operational hierarchy within the council
- Standardising the language used across health and social care to facilitate joint working and integration
- Clearer statements in relation to the standards and timescales for document review.
- Clearer statements in relation to the requirement to initiate internal audit and quality assurance processes.
- Specific reference to the minimum standard for review of the overarching policy now being a three year cycle.

The remaining recommendations in relation to the independent audit were applied to the procedural guidance and have been included in a timetabled action plan which was submitted to the council's risk and governance board as outlined above.

E. CONCLUSION

The council has robust arrangements in place for medication management and this has been confirmed by independent audit. A process of continuous improvement, overseen by the Medication Advisory Group, ensures that operational guidance is up to date. It is anticipated that the overarching policy framework should be subject to review at least every three years

F. BACKGROUND REFERENCES

Nil

Appendices/Attachments: Medication Management Policy – Social Policy

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Community Care Assessment and Prevention
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Jennifer Scott
Head of Social Policy

Date of meeting:

15th April, 2014



WEST LOTHIAN COUNCIL

SOCIAL POLICY

MEDICATION MANAGEMENT POLICY

Date	Version	Considered By	Outcome	Review Date
6 TH March 14	1.2	Social Policy PDSP	Recommend Approval to Council Executive	

CONTENTS	PAGE
1. Introduction	3
2. Policy Objectives	3
3. Roles and Responsibilities	4
4. Assessment, Care Planning and Support Planning	5
5. Responsibility for Medication	5
6. Refusal to take Medication	7
7. Covert Medication	7
8. Record Keeping	8
9. Over the Counter Medication/ Alternative Remedies	8
10. PRN ('as required') Medication	9
11. Invasive Treatments	9
12. Other Procedures	10
13. Excursions and Outings	11
14. Rectal Diazepam/ Buccal Midazolam	11
15. Secondary Dispensing	12
16. Controlled Drugs	13
17. Errors and Near Misses	13
18. Medication Advisory Group	14
19. Capacity and Incapacity	14
20. Contracted Services	16
21. Training	16
22. Policy Monitoring	17
23. Review Arrangements	17

1. INTRODUCTION

Assistance with the management of medication is a key aspect for service users in a wide range of care and support services. **Where the service user is able to order/ store/ administer/ dispose of their own medication independently, they should be encouraged to do so.**

For those service users who do require staff intervention in some or all of the areas of managing their medication, this policy and the associated procedures have been designed to provide clear guidance for staff.

For the purposes of this policy, West Lothian Council (WLC) adopts the operating definition of medication used by the Care Inspectorate:

“Any substance or combination of substances presented as having properties for treating or preventing disease in human beings;

Any substance or combination of substances which may be used in or administered to human beings either with a view to restoring, correcting or modifying physiological functions by exerting a pharmacological, immunological or metabolic action, or to making a medical diagnosis.”

It should be understood that such diagnosis can only be determined by a qualified medical practitioner. Similarly, the question of mental capacity/ incapacity must be determined by a medical practitioner and, where incapacity is established, particular arrangements must be put in place to manage medication. These are outlined later in this Policy and the Service Procedure.

Additionally, the Policy and Procedures also address some medical *procedures* that may be undertaken by social care staff.

The Procedure is intended to encompass most medication issues arising in social care settings, but it cannot predict every situation that might arise. If in doubt about the right course of action to take, staff should always consult their line manager, the GP and/or pharmacist.

Additionally, the policy is agreed with the council’s insurers and all staff must be aware of the list of treatments and the conditions specified to ensure that no location is working outside the policy cover. Insurance cover for specific tasks out with the terms of the overarching policy can be negotiated by separate arrangement.

2. POLICY OBJECTIVES

The primary objective of the Policy and associated Procedure is to promote best practice in meeting the needs of service users through compliance with current guidance and the legislative framework.

The National Care Standards indicate that service users should be confident that staff in services will: *keep accurate, up-to-date records of all the medicines that have been ordered, taken or not taken, and disposed of; monitor medication and the condition for which it has been prescribed; seek the service user's permission to get medical advice if there are any changes or concerns about the medication, including side effects, or the service user's condition*

For the purposes of service delivery, this Policy and the supporting Procedures are structured to address each successive stage of staff involvement in the management of service users' medication and will seek to;

- Ensure medication **ordering** is efficient and effective
- Promote **storage** arrangements that are safe and secure
- Support medication **administration** arrangements that deliver the best possible care to service users
- Provide staff with clear guidance on **recording** practice requirements
- Ensure that the **disposal** of unwanted medicines is undertaken safely and lawfully
- Advise staff on **legal requirements** in relation to the administration of medicines for service users unable or unwilling to give consent

3. ROLES AND RESPONSIBILITIES

CHIEF EXECUTIVE AND DEPUTY CHIEF EXECUTIVE

To oversee the strategic approach of the Policy and Framework Procedure for the management of medication in Social Policy services in West Lothian Council (WLC) and in services contracted to WLC and to approve the arrangements in place. To ensure that sufficient resourcing is available to implement the strategy.

HEAD OF SOCIAL POLICY

To oversee the development and implementation of the Policy and Framework Procedure for the management of medication in Social Policy services in WLC and in services contracted to WLC and to approve the arrangements in place.

SENIOR MANAGERS

To oversee the development and implementation of the Policy and Framework Procedure for the management of medication within their field of responsibility in Social Policy and in those services contracted to their field of responsibility and approve the arrangements in place.

GROUP MANAGERS

To oversee the implementation of the Policy and the development of Service Procedures for the management of medication for those services within their field of responsibility and approve the arrangements in place.

SERVICE MANAGERS

To oversee the implementation of the Policy by service staff and to take the lead in the development of a Service Procedure for the management of medication their service. This oversight is to be exercised by a routine of planned auditing of the ordering/ storage/ administration/ recording/ disposal arrangements within the service. Service managers should ensure that all staff with a supervisory responsibility are aware of how they can access specialist information, including access to current British National Formulary (BNF) / Mimms reference literature.

CARE STAFF

To implement the Policy and Service Procedure for the management of medication, in line with their training and direction.

4. ASSESSMENT, CARE AND SUPPORT PLANNING

The assessment of the need for medication must be undertaken by staff employed by the Health Board. Staff employed in social care settings are not authorised to determine whether medicines can or should be administered (please also see section 9 below on Over the Counter Medicines and Alternative Remedies).

Social care staff should include the management of medication or medical procedures in the care plan only when medically trained staff have determined their use. In most cases, the planning of medication management will be pre-determined (e.g. a prescription will describe what the medicine is, the dosage level, and when it should be applied). In these circumstances the task for social care staff will be to administer the medication as directed.

Where there is an arrangement for Anticipatory Care Planning with local Health services, service staff will engage with health colleagues to review existing care arrangements, including current medication arrangements, and pro-actively to consider service users' health requirements. This may happen on an ad-hoc basis, where the existing arrangements may need to be altered due to a change in circumstances, or it may happen on a planned basis, even where there have been no changes over the previous twelve month period.

Where an Anticipatory Care Plan does not exist, and service users have been taking medication regularly, social care staff are still encouraged to seek a review of that medication on at least an annual basis.

Please see Appendix A for details of the Treatment Table of current procedures and the appropriate level of Insurer cover.

5. RESPONSIBILITY FOR MEDICATION

Medication is the legal property of the person for whom it has been prescribed and dispensed. Consequently it cannot be shared with other service users, even where the medicines are identical. Care staff have a responsibility to manage the service user's medicine for the service user's benefit and in line with the Council's practice guidance.

HEALTH CARE PROFESSIONALS with the appropriate qualifications have responsibility for prescribing medication, the form in which it comes, and assessing the interaction with other medicines. They will also be responsible for some procedures that require health training to administer (e.g. injections). They also have responsibility for determining questions of capacity/ incapacity and issuing s.47 certificates where appropriate.

The supplying PHARMACIST has legal and ethical responsibilities relating to the safe supply of medicines. These include, but are not restricted to accurate dispensing of medication and medicinal products. All dispensed items should detail: the medication including name, strength and form; the frequency of administration; any cautions or warnings. Labelling requirements also include the name of the service user; dispensing date and the details of the supplying community pharmacist. Where the supplying community pharmacy is contracted to NHS Lothian's Primary Care Contractors Organisation through a locally negotiated service to provide support and advice on the safe storage and administration of medicines, there is a requirement for the pharmacist to visit the service at least quarterly to review the arrangements for medication management.

CARE STAFF have the responsibility to administer medication in line with the prescribed/ labelled instructions and to ensure that the administration is recorded appropriately. Medication must also be administered in a way that respects the autonomy, human rights, privacy, and cultural and spiritual beliefs of the service user and takes full account, where appropriate, of the wishes of their family and carers. People with capacity must give consent (which may be written, verbal or non-verbal) before medicine is administered.

Care Plans and/or Medication Administration Records (MAR) sheets should include clear guidance on the applications of creams and ointments. The instruction should provide dosage instructions, the site of application (arms, legs etc) and a review date for treatment.

Council employees must not make clinical decisions/judgements regarding the administration of medication. The service user's doctor, and the carer or proxy (nominated person) should always be consulted. Some employees within the council are qualified nurses but are not employed within this role (with very few specific exceptions). Council insurance cover does not apply to making clinical decisions, unless staff have been explicitly employed to undertake such nursing tasks and these tasks are outlined in their job description. It is the expectation of the professional body, the Nursing and Midwifery Council, that their members have a responsibility for their own accountability. Staff should seek further advice should they be unsure of their position in this matter.

Contacts with the GP and pharmacist can be made by staff designated to do so in the Service Procedure to discuss whether different prescribing decisions, or forms of medication, are suitable for the service user that might remove or reduce need for assistance in e.g. respite care and day support services.

West Lothian Council employees must only administer medication prescribed or approved by a medical practitioner. Medication may be dispensed in a monitored dosage compliance aid (e.g. Nomad or Dosette), which may help the safe and accurate management of medication, particularly in cases where significant quantities of medication are prescribed. In other cases, the supplying pharmacist may dispense the medication in individually labelled original packs with a calendar marking. This arrangement is explicitly approved by the Care Inspectorate and will help ensure that essential medicines are received in a container that assists staff to chart how many doses have been received and how many dispensed, giving an early alert to possible problems.

6. REFUSAL TO TAKE MEDICATION

Any refusal to take medication should be recorded and appropriate advice sought from the GP and/or the supplying pharmacist. Council employees, when involved in providing support and assistance to service users, must only carry out duties in accordance with their authority and training.

A service user with capacity may refuse medication and that decision must be respected by care staff, although we would seek to persuade them to accept medication prescribed for their benefit. If a service user without capacity refuses the administration of medication, the following steps should be followed:

- Social Work employees must not force individuals to take their medication
- Staff have a duty to preserve life using the least restrictive means possible
- Consultation should be undertaken with an appropriate medical practitioner about the consequences of the failure to take the medication and, if required, this should be recorded in the care plan.
- The person **who has legal authority** to consent on the service user's behalf must be contacted and informed of the situation
- In an emergency, staff should phone 999.

Where possible, Protocols should be agreed in advance with the service user's medical practitioner with regards to what to do when medication is refused. The Protocol should be clearly set out in the care plan.

7. COVERT MEDICATION

Medication administered covertly could be considered an assault on the service users and should not be disguised unless on the specific instruction and guidance of the medical practitioner with the agreement of the carer and the multi-disciplinary team. Staff must have regard to the fact that some medication loses effectiveness when its form is changed – e.g. some tablets are unsuitable for crushing.

There may be circumstances in which there has been a determination for a Compulsory Treatment Order to be in place. Implementation of such an order must comply strictly with the legislation and the advice of staff in council mental health services should be sought.

The administration of covert medication is only compatible with the existence of a certificate issued by a qualified medical practitioner under Section 47 (s.47) of the Adults with Incapacity Act (see also Section 19 below on Capacity/ Incapacity) and therefore medication should not be administered covertly except where such authority pre-exists.

8. RECORD KEEPING

Each service must have clear systems for maintenance of records and their eventual safe destruction to maintain confidentiality.

Personal medicine records should be incorporated into, or appended to, the service user's file. Day to day medication management records (including Kardex/ Medication Administration Records (MAR's) should be easily accessible for care staff to use daily. Both sets of records must be stored in a secure unit. Computerised records should be backed up at least weekly according to a schedule and method agreed with Information Services and stored off site.

Care services are advised to retain a copy of every prescription (GP10) that is presented to the pharmacy in order to cross reference, should the need arise. Similarly, any medicines that are returned to the community pharmacy for disposal should always be receipted by the pharmacist and the receipt retained by the care service for the appropriate length of time.

Fridge temperatures must be monitored and recorded where medicines need to be stored in chilled conditions. The temperature should be in the range 2 – 8 degrees Celsius and staff should be aware of the escalation process if temperatures are outwith these parameters.

Obsolete personal records and unit medication records should be removed to the area social work office or approved depository, archived for the appropriate length of time, then treated as confidential waste and destroyed.

Where the service user requires help with medication and, subject to their consent, current medication lists can be requested from GPs if required. GP's print the list from their computer records, so the request should not generate a significant workload.

For the purposes of service development and improvement, services should also record 'near misses'. A 'near miss' can be defined as 'an unplanned event, situation or error which took place but due to timely intervention did not result in any actual injury, illness or harm.

Some examples might include: Drugs found to be stored under wrong conditions; Stock drugs found to be passed expiry date; Error noted in drug labelling; Failure to record allergy to medication identified; Failure to document medication administration identified; Drug Trolley found to have been left unlocked'

9. OVER THE COUNTER (OTC) MEDICATION/ ALTERNATIVE REMEDIES

Some non-prescription OTC medicines are readily available and can be obtained from pharmacies, shops, supermarket or local garage without a prescription, such as paracetamol and aspirin containing pain killers, cough mixtures, indigestion remedies, herbal and homeopathic remedies etc. People with capacity, and who are mobile, can purchase and consume these products at their own discretion. Care staff are advised to encourage such service users to seek medical or pharmaceutical advice when doing so in addition to taking prescribed medication.

However, West Lothian Council employees should not purchase, recommend, assist with, or administer OTC medication to service users (with or without capacity) without seeking medical advice. The risks involved in doing so include:

- Issues with dosage
- Effects upon any other medication taken by a service user
- Unknown allergies
- Possible side effects

Unless prescribed by a medical practitioner, West Lothian Council employees should not administer such medication and this may include preparations that use alternative medicinal approaches (e.g. homeopathic remedies). There can be problems distinguishing between the effect of an error in administration and an unexpected side effect of a drug. In light of this, social care staff should avoid the potential for uncertainty and ensure that they only administer medication that has either been prescribed or approved for use following medical or pharmaceutical advice. These arrangements would *not* include preparations made with some household ingredients (e.g. a hot drink made with honey and lemons) and if staff are uncertain, they should consult with their manager in the first instance.

10. PRN (AS REQUIRED) MEDICATION

Some medications are prescribed to be used on an occasional basis. Pro Re Nata (*“as the thing is needed”*) medications require particular attention because care staff will need to make a judgement about when that need has arisen. In order to ensure a degree of consistency in approach, care services should prepare a Protocol for the use of PRN medications. The Protocol should outline explicit guidance for staff to address three stages:

1. The circumstances under which the PRN meds should be administered, including description of the dose/ frequency. This may require setting out triggers that describe physical or behavioural conditions.
2. The expected consequence of the administration of the medication: what should happen and how long that should take
3. What action should be taken if the desired outcome has not been achieved.

11. INVASIVE TREATMENTS

Some medications require administration inside the body, such as the administration of diazepam per rectum. West Lothian Council employees must not administer invasive treatments to a service user unless:

- a clear negotiated care and support plan is in place detailing such a requirement
- care staff have undergone relevant training
- their training is up to date, authorised by their service manager and documented

Most social care staff are not able to administer injections, although some may, *if they have been trained and are qualified to do so*. The management of Diabetes can involve the use of a Glucometer, which can provide a reading of blood/ sugar levels. Where appropriate training has been provided, social care staff may be able to use such equipment for monitoring purposes to help determine whether medical assistance needs to be sought. There are no circumstances under which social care staff will be able independently to determine a clinical response to a given situation.

Other, potentially life-saving emergency procedures have been granted approval by the Councils insurers, subject to strict conditions: The approved procedures include:

- adrenaline emergency treatment(e.g. EpiPen or Jext)
- rectal diazepam
- oral (buccal) midazolam

These procedures are used in accordance with a client's care plan provided that the member of staff has been properly trained. The service should retain records of the training sessions including who provided the training, who attended the training, the signatures of those involved and the date by which refresher training is needed. Refresher training should be carried out at intervals in accordance with best practice and similar records held.

Some treatments are presently considered too risky, rare or complex for social care staff to administer. Service users who need help with these therapies are unable to fully access certain community activities or services without the presence of a nurse.

The council shall continue to keep under review the provision by social care staff of other therapies that are currently provided by health care staff in West Lothian and by social care staff in some other agencies.

12. OTHER PROCEDURES

Certain care processes and procedures do not involve the use of medication but require varying degrees of precaution and training, such as the change of stoma bags or assistance with prostheses. The policy for infection control outlines general precautions.

The use of Oxygen Therapy can be supported in social care settings, if staff have been trained to do so. Such training can include a demonstration in use by either medically qualified staff or equipment technicians. The application/use of oxygen would include social care staff assisting in regulating and monitoring the flow of oxygen, as well as adjusting and fitting the mask. Administration of oxygen is allowed subject to written guidelines and provided it does not breach pre-prescribed medical advice.

Approval by the unit manager and instruction by an appropriately qualified health professional is required for all staff required to carry out any task involving unfamiliar procedures, complex equipment, intimate care or contact with bodily fluids. This should be supported with a written care plan, including a protocol outlining the tasks and precautions to be undertaken.

Managers and staff need to be alert to service users who may have received radiotherapy treatment and the potential for exposure to themselves. Although the likelihood of occurrence of exposure is low, the consequences, particularly where there is repeated exposure, for the individual carer and Council may be high.

13. EXCURSIONS AND OUTINGS

Planning for the management of medication during excursions and outings should always be done in advance. Where possible, staff should take medication in the original container with full labelling. Staff may want to consider taking copies of Care Plans (or extracts of care plans) for individuals for reference and guidance purposes. Mobile phones can be pre-programmed with local clinic numbers at destination and knowledge of location of clinics/hospitals may be pre-planned depending on risk.

During transportation, although the need for emergency administration is unlikely to occur, there is always a possibility. Depending on the criteria provided by the prescribing GP every effort must be made by the driver and escort to call on the assistance of the emergency service.

A risk assessment will serve to demonstrate which service users are likely to require emergency treatment and under what circumstances. The outcome must inform management action to ensure that staff are available and suitably trained to provide treatment. Escorts must be provided during transportation where there is a significant likelihood of emergency action being required.

14. RECTAL DIAZEPAM/ ORAL (BUCCAL) MIDAZOLAM

For the safety of the service user and the guidance of staff, it is essential that a Protocol is established for the use of these medications (see also Section 10 PRN Medication above and take into account the occasional need for medications). The prescribing practitioner should provide clear instructions setting out when they should be used, how much should be given and any precautions necessary. Those instructions should form the basis for the Protocol and the use for these medicines.

Only members of staff trained and competent in carrying out the procedures are permitted to make the judgement as to whether it is an emergency. If there is no approved or suitably trained member of staff available the emergency services must be called. The service user's privacy and dignity must be protected as far as possible in all circumstances.

It is the responsibility of the senior care worker on duty to ensure that the service user is placed in safe and well-supervised surroundings and that any urgent medical / nursing intervention is easily accessible if necessary.

Written consent must be sought from the service user (if they have capacity) or the relative/ representative of a person likely to require emergency medication to control convulsions, setting out their agreement for social care staff to undertake the procedure as necessary. In the case of rectal administration, information about the preferred gender of the staff member undertaking the procedure should also be sought. For those not able to express a preference, same sex administration should apply. In an emergency, the absence of the appropriate gender staff should not delay administration.

It shall always be preferable for two staff to be present when emergency administration is being carried out. Again, however, the absence of a second member of staff should not delay the administration.

In a public place, removed from the establishment, the emergency services (ambulance) should be called out. If due to unforeseen circumstances, the situation becomes potentially life threatening, administration of rectal diazepam may be conducted within the criteria set by the GP while providing the maximum privacy possible.

At all times the necessary universal precaution (protective clothing, gloves etc) must be worn to minimise the risk of any infection.

15. SECONDARY DISPENSING

Under no circumstances will 'secondary dispensing' be undertaken by staff in any service.

For the avoidance of doubt, secondary dispensing occurs where staff have *pre-potted* medication into a single container, ready for provision to the service user. Usually this arrangement can happen where staff 'pre-pot' for several service users at the same time, or pre-pot for medication to be left with the service user to take at a later time. Secondary dispensing is *not the same* as staff collating several medicines into a single container immediately before handing that pot to the service user for ease of handling and instant consumption.

Where possible, services should consider whether the service user is able to store and administer the medication independently. This may include the use of a monitored dosage system for storing and dispensing tablets. Systems are also available to manage liquid medication in this way too. As

well as enhancing the service user's independence, this approach reduces the need for dispensing and stock control/auditing.

Monitored Dosage Systems (MDS) can be helpful to staff in services or in the service user's own domestic premises and support staff to reduce the need for unnecessary storage or handling arrangements.

16. CONTROLLED DRUGS

Controlled Drugs, by their nature, require more careful management and staff are advised to ensure that all steps in the process of managing CD's are managed jointly with a colleague wherever possible. The requirement for control is based on the potential for significant impact through use of these drugs (e.g. to induce a dependency) and/ or on their toxicity. Consequently, there are special arrangements in place for the storage/ administration/ recording/ disposal of Controlled Drugs. These are set out in the Medication Procedure.

Activities that control the manufacture, supply and possession of controlled drugs are governed by the Misuse of Drugs Act 1971. Penalties applied to offences involving different drugs are graded according to the harmfulness attributable to a drug when it is misused. The drugs are legally defined into three classes; Class A, Class B and Class C and are medically defined into Schedules 1 - 5. Drugs included in these classes are listed in the current *British National Formulary* (BNF).

People who are authorised to supply and possess Controlled Drugs while acting in their professional capacity, and the conditions under which these activities may be carried out, are defined in the Misuse of Drugs Regulations 2001. The drugs within each schedule, and an overview of the requirements that apply, are also identified in the *BNF*.

See Appendix B for a list of Controlled Drugs. **Please note that this list is subject to change and staff should therefore be alert to the need to ensure current information is accurate.** A link to a current list is included on Appendix B.

17. ERRORS AND NEAR MISSES

In seeking emergency medical support (e.g. where it is suspected that medicine has been wrongly administered), staff can seek advice and assistance from: the service user's GP; NHS 24 (if out of hours); the supplying pharmacist; local NHS nurse or using the 999 system.

Mistakes and/or adverse reactions may occasionally happen for various reasons. Every employee has a duty to report any breach of this policy and the associated procedures or untoward incidents. Managers should encourage staff to report/ record all incidents, however minor. They should be dealt with in a constructive manner that addresses the underlying reason for the incident and prevents recurrence.

Health and safety Incident Report forms should be used to report all incidents of error in the management, control and administration of medication and medical processes, including near

misses. In addition to meeting the Health & Safety reporting requirement, these details are fed into centrally held computer systems and will provide information to managers to assist them to take any necessary action to reduce future risks. Records should be completed as soon as possible after the event and, in all cases, before staff finish their shift.

The circumstances relating to errors should always be investigated, the level being proportionate to the individual circumstance and context. This will assist managers to differentiate between those cases where there was a genuine mistake, where the error may have resulted due to pressure of work or where reckless practice was undertaken and concealed. With regard to near misses, all instances should be recorded. Regular analysis of the outcomes of error investigations and review of near misses will assist the service to identify trends and consider what supportive or corrective interventions are required.

18. MEDICATION ADVISORY GROUP

This Policy has been prepared in conjunction with a Framework Procedure. That Framework Procedure is intended to guide all WLC social care services about the way in which the Medication Procedure for that service should be structured in order to implement the policy.

In order to maintain oversight of the Policy/ Framework Procedure/ local procedures, a Medication Advisory Group will be convened on a regular basis by a nominated Senior Manager to review the efficacy of current guidance, best practice developments and any practice issues that might benefit from detailed discussion.

19. CAPACITY AND INCAPACITY

Where a service user is managing and self administering their prescribed medication and is clearly able to do so without assistance (in any setting), there is no requirement for the intervention of West Lothian Council staff. However, there is an expectation that keyworkers will monitor the continuing ability of the service user to cope with their medicines.

If the person has the capacity but not the physical ability, the key worker should record this and provide instruction(s) with regards their medical needs. By doing this, potential risks to service users, employees and the council will be reduced.

Service users with capacity should be given information about granting a Power of Attorney to a named person or persons in the event that their condition may deteriorate, in order that their Financial or Welfare interests can be protected even when their own capacity to do so may reduce. This is normally a fairly simple process requiring input from a solicitor, and can be done at the same time as a will. Most people would prefer to name people they know and trust to take responsibility for their welfare and finances rather than leave it to the Courts to appoint someone.

Where service users have capacity and are able to provide or withhold informed consent to treatment being provided, those views and wishes of those service users must be respected.

Many of the service users in social care settings may be unable to give informed consent to medical treatment due to their condition (e.g. those suffering from a significant level of dementia). In these circumstances, the administration of medical treatment without consent may constitute an offence. The *Adults with Incapacity Act* (AWI Act) sets out in Part 5 detailed guidance regarding medical treatment and incapacity.

In circumstances where a service user is unable to give informed consent, arrangements need to be made in order for that treatment to be administered. These arrangements may include the designation of someone authorised to give consent on the service user's behalf (e.g. a Welfare Guardian or a Welfare Power of Attorney) and the arrangements may include the issuing of a certificate under Section 47 (s.47) of the AWI Act. S.47 certificates can only be issued by a qualified medical practitioner who has determined that the service user requires treatment and is unable to make an independent and informed decision about giving or withholding consent.

Any treatment administered under the AWI Act must be able to meet the principles attaching to that legislation:

- The intervention must be of **benefit** to the individual
- The intervention must be to the **minimum level** to achieve the desired outcome
- It must take account of the adult's **wishes and feelings**
- It must have involved **consultation** with significant others
- It must encourage **exercise of residual capacity** in the individual

Treatment under Part 5 is subject to exceptions. It cannot authorise certain treatments and can only authorise others subject to additional requirements. There is a standard appeals procedure under Part 5 for resolving disputes. This can be invoked by any person who is directly involved.

The service user is deemed incapable of giving consent, if he or she is incapable of:-

- acting; or
- making decisions; or
- communicating decisions; or
- understanding decisions; or
- retaining the memory of decisions

to safeguard or promote his/her interests in, his/her property, financial affairs or personal welfare, and is likely to continue to be so incapable.

Incapacity may be by reason of mental disorder or (following the exploration of all alternative forms of communication) of inability to communicate because of physical disability.

A wide range of sources can inform assessments of incapacity. Doctors have principal responsibility for assessments of capacity where formal interventions under the Act are being considered, but any assessment should involve all key members of the multi-disciplinary Team.

If a member of staff believes that an adult has areas of their life where they do not have full capacity, then they will need to examine what measures are in place to address these issues. Where there appear to be gaps this should be discussed with their appropriate line manager. Consideration should be given to the need to seek advice from the AWI/MHO team.

The AWI Act allows for intervention only in matters where the adult lacks capacity. It is necessary to consider whether the adult lacks capacity in relation to the relevant matter each time a decision or action falls to be taken.

Assessing the capability of people with *fluctuating* capacity (for example resulting from delirium or hypomanic conditions) will present particular issues. In such cases, it may be best that a s.47 certificate of incapacity should be of short duration to ensure that the patient's freedom is not restricted more than necessary. If a decision can reasonably be deferred until the adult is likely to regain sufficient capacity then in accordance with the principles of implementation set out above, it must be deferred.

Issues regarding the matter of capacity can be discussed with the AWI Team.

Social work staff should obtain a copy of the Court Order granting the Guardianship Order or Intervention Order. In the case of Welfare Attorneys, social work staff should request an authorised copy of the document conferring the power of attorney.

20. CONTRACTED SERVICES

All Service Providers (SP) contracted to work on behalf of WLC have their policies and procedures scrutinised during the set-up of the contractual arrangements and in line with the current best practice.

WLC will provide relevant medication information to SP's contracting with WLC to provide care and support to service users who require assistance to manage their medication.

Complaints or concerns regarding the service provided will be channelled through the Council's formal complaints procedure. Where this involves a contracting SP, it would be passed to them for actioning. The SP will be required to provide a concluding statement outlining how the situation has been investigated and where necessary improvements made.

Services must ensure that the arrangements with contracted services for the disposal of products arising from medical treatment, including clinical waste and radioactive products ensures the safety of service users, service staff and contracted staff. Additional advice should be sought as necessary from Health services.

21. TRAINING

There are significant training and supervision implications for managers and staff in implementing the Policy and associated Procedures and achieving full compliance. A suitably experienced pharmacist should be involved in the design and delivery of all medication training. The following training needs have been identified:

ALL STAFF

General staff induction should incorporate basic medicine awareness, and an introduction to the medication procedures. A copy of this policy should be made available as part of the induction pack. Unit induction shall include a hands-on introduction to unit level documentation, protocols, and procedures appropriate for that service setting.

Staff authorised and trained to carry out specific high risk procedures: e.g. controlled drugs administration, rectal diazepam, shall receive close on-the-job supervision by their manager or trainer for the first three months following training. If they have not carried out the procedure for 12 months, they shall be required to undergo a refresher course or further close supervision as appropriate, and this shall be recorded in their personal development plan.

MANAGERS, SUPERVISORY STAFF AND STAFF IN SOLE CHARGE

Advanced practitioner training in these procedures, followed by close supervision by the line manager for at least three months, is required for any staff member likely to be in a position of responsibility or sole charge, including night staff and outreach workers.

CONTINUOUS LEARNING

There should be top-up training provided in the event of any significant changes in procedures or new medications. Medicine administration, including a full discussion of areas for improvement, should form a regular agenda item at individual supervision and staff team meetings.

TRAINING DOCUMENTATION

All training should be properly documented with copies in the individual staff file and in the unit training file.

22. POLICY MONITORING AND REVIEW ARRANGEMENTS

The monitoring arrangements for the various aspects of this policy are set out above at Section 3 (Roles and Responsibilities).

The Head of Social Policy will have responsibility for ensuring that the policy and the associated Framework Procedure are reviewed and revised where necessary at intervals not exceeding three years. Subordinate to those arrangements, Group Managers will have responsibility for ensuring that Service Procedures are reviewed and revised where necessary at intervals also not exceeding three years.

All services will undertake a programme of internal and peer practice audit, at intervals to be agreed between the Group Manager and the Senior Manager. The audit will consider all steps in the process of acquiring, storing, administering, recording and disposal of medicines.

23. NEXT REVIEW DATE: COMPLETION BY NOT LATER THAN MARCH 2017

Appendix A

TREATMENT TABLE

Procedure/Activity/Use of	Cover Available
Acupuncture	No
Anal plugs	No
Apnea monitoring	Yes – in respect of monitoring via a machine following written guidelines. There is no cover available in respect of visual monitoring
Bathing	Yes – following training and in accordance with written guidelines
Blood samples	Yes – but only by Glucometer following written guidelines
Buccal medazolam	Yes – following written guidelines
Bladder wash out	No
Catheters	Yes – following written guidelines for the changing of bags and the cleaning of tubes. There is no cover available for the insertion of tubes
Colostomy/Stoma care	Yes – following written guidelines in respect of both cleaning and changing of bags
Chest drainage exercise	Yes – following written health care plan provided under the direction of a medical practitioner
Dressings	Yes – following written health care plan for both application and replacement of dressings
Defibrillators/First Aid only	Yes – following written instructions and appropriate documented training
Denture cleansing	Yes – following appropriate training
Ear syringe	No
Ear/Nose drops	Yes following written guidelines
Enema suppositories	No
Eye care	Yes – following written guidelines for persons unable to close eyes
First Aid	Yes – Should be qualified first aiders and applies during the course of the business for the benefit of employees and others
Gastronomy tube – Peg feeding	Yes – cover available in respect of feeding and cleaning following written guidelines but no cover available for tube insertion
Hearing aids	Yes – for assistance in fitting/replacement of hearing aids following written guidelines
Inhalers, and nebulisers	Yes – for both mechanical and held following written guidelines
Injectors	Yes but only for the administering of pre packaged does on a regular basis pre prescribed by a medical practitioner and written guidelines
Medipens	Yes – following written guidelines with a preassembled epipen
Mouth toilet	Yes
Naso-gastric tube feeding	Yes following written guidelines but cover is only available for feeding and cleaning of the tube. There is no cover available for tube insertion or reinsertion which should be carried out by a medical practitioner.
Occupational therapy	No

Oral medication	Yes - subject to being pre-prescribed by a medical practitioner and written guidelines. Where this involves children, wherever possible Parents/Guardians should provide the medication prior to the child leaving home. A written consent form will be required from Parent/Guardian and this should be in accordance with LEA procedure on medicines in schools etc
Oxygen – administration of	Similar consideration should be given when asked to administer “over the counter” medicines.
Pessaries	Yes – but only in respect of assisting user following written guidelines, i.e. applying a mask
Reiki	No
Physiotherapy	Yes
Pressure bandages	No
Rectal medazalam in prepackaged dose	Yes – following written guidelines
Rectal diazepam in prepackaged dose	Yes – following written guidelines and 2 members of staff must be present
Rectal Paraldehyde	Yes – following written guidelines and 2 members of staff must be present
Splints	No
Suction machine	Yes – as directed by a medical practitioner
Syringe drivers- programming of	No
Suppositories	No
Swabs - External	No other than rectal diazepam and medazalam.
Swabs - Internal	Yes – following written guidelines
Toe nail cutting	No – other than oral following written guidelines
Tracheostomy	Yes – following written guidelines
Ventilators	No – Cover is only available for cleaning around the edges of the tube only following written guidelines Yes – following written guidelines

Appendix B

An extensive (not exhaustive) list of drugs controlled under the misuse of drugs legislation and their respective classifications under both the Misuse of Drugs Act 1971 and the Misuse of Drugs Regulations 2001 can be found at

<https://www.gov.uk/government/publications/controlled-drugs-list>

There are legal requirements for the receipts, storage, recording and administration of these medicines. These requirements do not apply to every care setting and do not apply when a person looks after and takes their own medicines.

The Controlled Drug (CD) Schedules

- | | |
|--------------------|--|
| Schedule 1: | No recognised medicinal use. Possession and supply prohibited except in accordance with Home Office authority |
| Schedule 2: | For example; methadone, diamorphine, morphine, pethidine, fentanyl.
Schedule 2 Controlled Drugs are subject to safe storage requirements and should be returned to a community pharmacy for destruction |
| Schedule 3: | For example; midazolam and temazepam. Schedule 3 drugs are subject to safe storage requirements. |
| Schedule 4: | For example; diazepam. |
| Schedule 5: | For example; dihydrocodeine, co-codamol and codeine linctus |



West Lothian
Council

COUNCIL EXECUTIVE

1,000 NEW BUILD COUNCIL HOUSES PROGRAMME

REPORT BY HEAD OF HOUSING, CONSTRUCTION AND BUILDING SERVICES

A. PURPOSE OF REPORT

The purpose of this report is to update Council Executive on progress with the 1,000 New Build Council Houses Programme.

B. RECOMMENDATION

It is recommended that Council Executive:

1. Notes the progress with Lots 1 and 2 and the indicative timescale for progressing Lots 3 - 5;
2. Approves the proposed changes to the list of sites to be included in the New Build Council Housing Programme.
3. Approves the transfer of the sites required for the new build programme from General Services to HRA and notes that Scottish Government approval for such transfers will be required; and
4. Notes the financial matters highlighted in the report and that at this stage the new build programme remains affordable.

C. SUMMARY OF IMPLICATIONS

I Council Values

- Focusing on our customers' needs;
- Being honest, open and accountable;
- Providing equality of opportunity;
- Making best use of our resources; and
- Working in partnership.

II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)

The policy of building new council houses is covered in the West Lothian Local Housing Strategy.

Some of the sites proposed for new build council housing are allocated for residential development in the adopted West Lothian Local Plan. Specialist legal advice has been sought on the procurement process.

	Environmental and equality assessments will be carried out as appropriate.
III Implications for Scheme of Delegation to Officers	None.
IV Impact on performance indicators	None.
V Relevance to Single Outcome Agreement	<p>Our economy is diverse and dynamic and West Lothian is an attractive place to do business.</p> <p>We live in resilient, cohesive and safe communities.</p> <p>We make the most efficient use of our resources by minimising our impacts on the built and natural environment.</p>
VI Resources - (Financial, Staffing and Property)	<p>The Housing Capital Programme 2013/14 to 2017/18 approved by West Lothian Council on 29 January 2013 approved £90 million for the New Build Council Housing Programme.</p> <p>Taking account of Government Grant and other sources of funding, a total budget of £104.728m has been identified.</p> <p>Capital budget provision of £6.066m has been identified for the transfer of land from General Services to HRA to support the new build programme. If the changes to the sites recommended in this report are agreed, the value of the land being transferred to HRA would increase to £8.346m.</p>
VII Consideration at PDSP	The proposals set out in this report were considered by Services for the Community PDSP on 8 April 2014.
VIII Other consultations	Planning & Economic Development, Finance and Estates, Legal Services

D. TERMS OF REPORT

D.1 Background

The council's Corporate Plan 2013 to 2017 commits the council to increasing the number of council houses available for rent through the New Build Council Housing Programme.

Council Executive approved an initial list of eight sites on 26 February 2013 with potential to accommodate 603 houses (see List A in Appendix 1)

On 25 June 2013, Council Executive approved a further list of 14 sites capable of accommodating 371 houses (see List B in Appendix 1). A further four sites (see List C in Appendix 1) were identified as potential sites for inclusion in the project should there be any ground stability or other problems with the sites identified in List A and/or List B.

D.2 Lots 1 & 2

Lot 1 comprises sites in Bathgate, Pumpherston and Blackburn. In total, 195 houses are proposed across the three sites. Tenders were returned on 13 February 2014 and are currently being assessed. It is anticipated that the preferred contractor will be identified by mid April 2014.

Lot 2 is a large site at Kirkhill, Broxburn. Tenders were returned on 27 February 2014 and are currently being assessed. The number of houses proposed for this site has been reduced from 250 to 230. This change was necessary following feedback from potential contractors that it was proving difficult to accommodate 250 houses on the site. It is anticipated that the preferred contractor for Lot 2 will be identified by the end of April 2014.

The anticipated start date for Lots 1 and 2 is January 2015.

D.3 Lots 3 - 5

It is proposed to tender for the final three Lots later this year. The indicative timescale is as follows:

Lot	Invitation to tender	Submission of tenders
3	26 May 2014	27 August 2014
4	4 August 2014	5 November 2014
5	8 September 2014	10 December 2014

It is essential that the final Lot is tendered no later than the end of September 2014 to provide sufficient time for all houses to be completed by April 2017.

It is recommended that some changes are made to the sites to be included in the programme to reflect changed circumstances.

D.4 Proposed changes to sites

A revised list of sites is attached as Appendix 2. This remains an indicative list as there continues to be some uncertainty about the availability/deliverability of a number of the sites.

From the list of 22 sites previously approved by Council Executive, it is recommended that two sites are removed and that four sites are moved to the reserve list:

- (1) **James Young High School (20 units)** – it is proposed to remove this site as it has not been possible to secure a servitude right of access from a third party landowner.

- (2) **Former Depot, East Calder (30 units)** – it is proposed to remove this site as the site investigations have revealed ground problems that will result in high abnormal costs. Furthermore, there are land ownership issues.
- (3) **Armadale CDA (40 units)** – it is recommended that this site is moved to the reserve list as the site is not currently in the control of the council and there is uncertainty about the timescale for the affordable housing land being secured by the council.
- (4) **Former Bowling Green, Philpstoun (5 units)** – it is recommended that this site is moved to the reserve list as a larger site is available within the Linlithgow ward in Linlithgow Bridge which will be more cost effective to develop.
- (5) **Glen Road, Deans (20 units)** – it is recommended that this site is moved to the reserve list as larger sites are available elsewhere in Livingston which will be more cost effective to develop.
- (6) **Rear of new Deans House (10 units)** – it is recommended that this site is moved to the reserve list as larger sites are available elsewhere in Livingston which will be more cost effective to develop.

It is also recommended that the site at Drove Road, Armadale (80 units) is removed from the reserve list as there are school capacity constraints which are unlikely to be resolved in the short term. Furthermore, it is recommended that the Candleworks site in Broxburn is removed from the reserve list as Tesco has recently decided not to go ahead with its proposed supermarket in this location and as a result of this decision the proposed distributor road and site remediation works which are necessary to develop the council land at Candleworks will not be implemented during 2014/15.

Seven new sites are recommended for inclusion in the programme:

- (1) **Land at Appleton Parkway, Eliburn (10 units)** – this site is expected to be transferred to the council by October 2015 following the recent conclusion of a planning obligation.
- (2) **Land at Almondvale Stadium, Livingston (40 units)** – land at this location has recently come back under council control and is now available for inclusion in the programme.
- (3) **Trim Track, Almondvale, Livingston (45 units)** – this is a council owned site and Council Executive has approved a planning brief for the site which permits housing development.
- (4) **Mill Road, Linlithgow Bridge (30 units)** – this is a council owned site. The housing mix will require to be agreed with Education Planning to ensure that the development does not result in school capacity problems.
- (5) **Adelaide Street, Craigshill, Livingston (6 units)** – planning permission has been granted for change of use from office to six flats. The project is already included in the Housing Capital Programme.

- (6) **Former Day Centre, Winchburgh (8 units)** – this listed building is surplus to requirements and is suitable for conversion to one bedroom units. If this site is included in the programme, it would not be progressed as a design and build contract through the new build Framework Agreement and would instead be progressed to tender once a design has been approved.
- (7) **Deans South (40 units)** – There has been a good level of interest from the remaining owners at Deans South in the Government's Open Market Shared Equity Scheme (OMSE), thus improving the prospects of the proposed redevelopment of the area being successful. In December 2013, there were 47 owners at Deans South. Since December 2013, the council has acquired 13 houses and a further 12 houses are expected to be purchased by the council by the end of April 2014.

Negotiations on a number of other properties are also on-going. A full update on the Deans South situation will be reported to Council Executive in April or May 2014. Subject to further satisfactory progress being made on land assembly, it is recommended that part of Deans South be included in the list of sites to be included in the new build programme.

With the exception of Deans South, plans of the proposed new sites are included in Appendix 3. The precise boundaries for the proposed Deans South site will be established in the next few months once the land assembly position becomes clearer.

Appendix 4 shows how each ward is affected by the proposed changes.

D.5 Funding

The financial model for the programme continues to be updated to reflect changed circumstances. At this stage, the programme remains affordable.

Capital budget provision of £6.066m has been identified for the transfer of land from General Services from HRA to support the new build programme. The value of the land to be transferred to HRA has been re-assessed having regard to the proposed changes to the sites outlined in this report. The value of the land that is proposed to be transferred to HRA is now £8.346m. Council Executive approval for this change will be necessary. Scottish Government will also require to approve the transfer of land from General Services to HRA. The General Services sites are identified in Appendix 2.

D.6 Other matters

The refurbishment/new build project at Bathville Cross, Armadale is planned to be implemented in five phases. There are no owner occupiers within phases 1 and 2 but there is a need to reach agreement with five owners in other blocks before phases 3 - 5 can be implemented. Further consultation with owners and tenants will be undertaken as the proposals evolve.

Development of the proposed 18 flats for older people at West Main Street, Broxburn, is expected to commence later this month.

There continues to be a number of risks associated with the new build council housing programme. These risks are regularly monitored by officers with various actions being taken to mitigate the risks.

E. CONCLUSION

The proposed change in sites will enable the council to meet the 1000 new build programme, with all wards continuing to be represented in the proposed programme. The timescales for procurement and delivery of the new build programme remain challenging and early Council Executive approval for the new sites will enable the programme to progress.

F. BACKGROUND REFERENCES

New Build Council Housing Programme – Council Executive report 25 June 2013.

New Build Council Housing Programme – Council Executive report 26 February 2013

New Build Council Housing Programme – Services for the Community PDSP 17 June 2013

Funding for Phase 3 of Council new build houses for rent – Services for the Community PDSP report 7 February 2012

2014/15 to 2017/18 General Services Capital Programme update

New Build Council Housing Programme – Services for the Community PDSP report 8 April 2014

Appendices/Attachments: Four

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Alistair Shaw

Head of Housing, Construction and Building Services

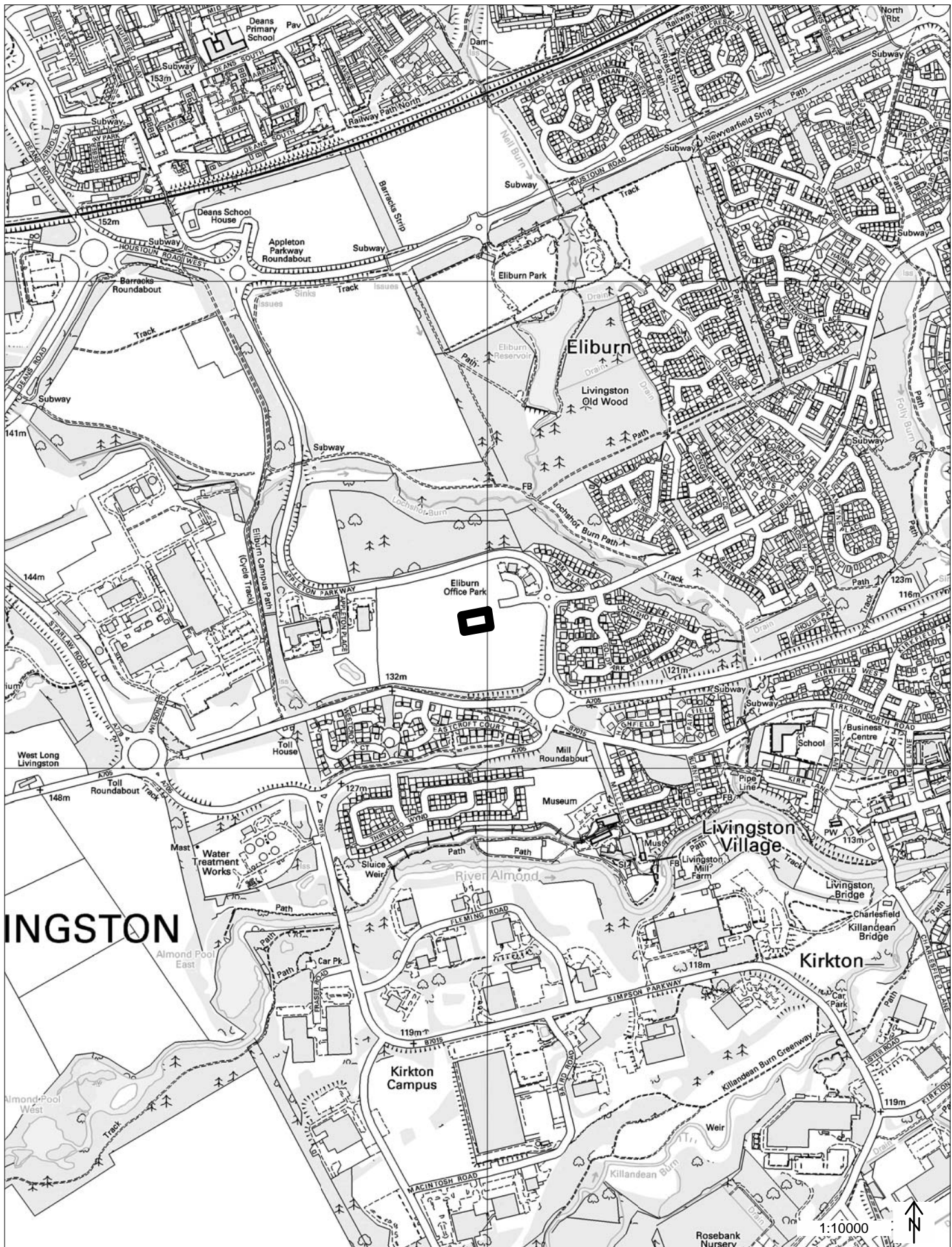
15 April 2014

List A – Sites approved 26 February 2013	Appendix 1
1. Wester Inch	80
2. Redhouse West	100
3. Kirkhill	250
4. Former Lammermuir House	80
5. Old School & CC Pumpherston	15
6. Easterfield, Fauldhouse	30
7. Former Depot, East Calder	30
8. Broxburn Old School site	18
Total	603
List B – Sites approved 25 June 2013	
1. Bathville Cross, Armadale	21
2. Armadale CDA	40
3. Nelson Park, Armadale	33
4. Windyknowe, Bathgate	14
5. Civic Centre Junction, Livingston	35
6. Glen Road, Deans	20
7. Rear of New Deans House	10
8. Land adjacent to James Young HS	20
9. Winchburgh CDA	41
10. Drumshoreland	82
11. Auldhill, Bridgend	5
12. Philpstoun Bowling Green site	5
13. Calderwood CDA	36
14. Walker Homes site, East Calder	9
Total	371
List C – Reserve sites approved by Council Executive 25 June 2013	
1. Community Centre, Bathgate	6
2. Drove Road, Armadale	80
3. Deans South, Livingston	250-300
4. Candleworks	100

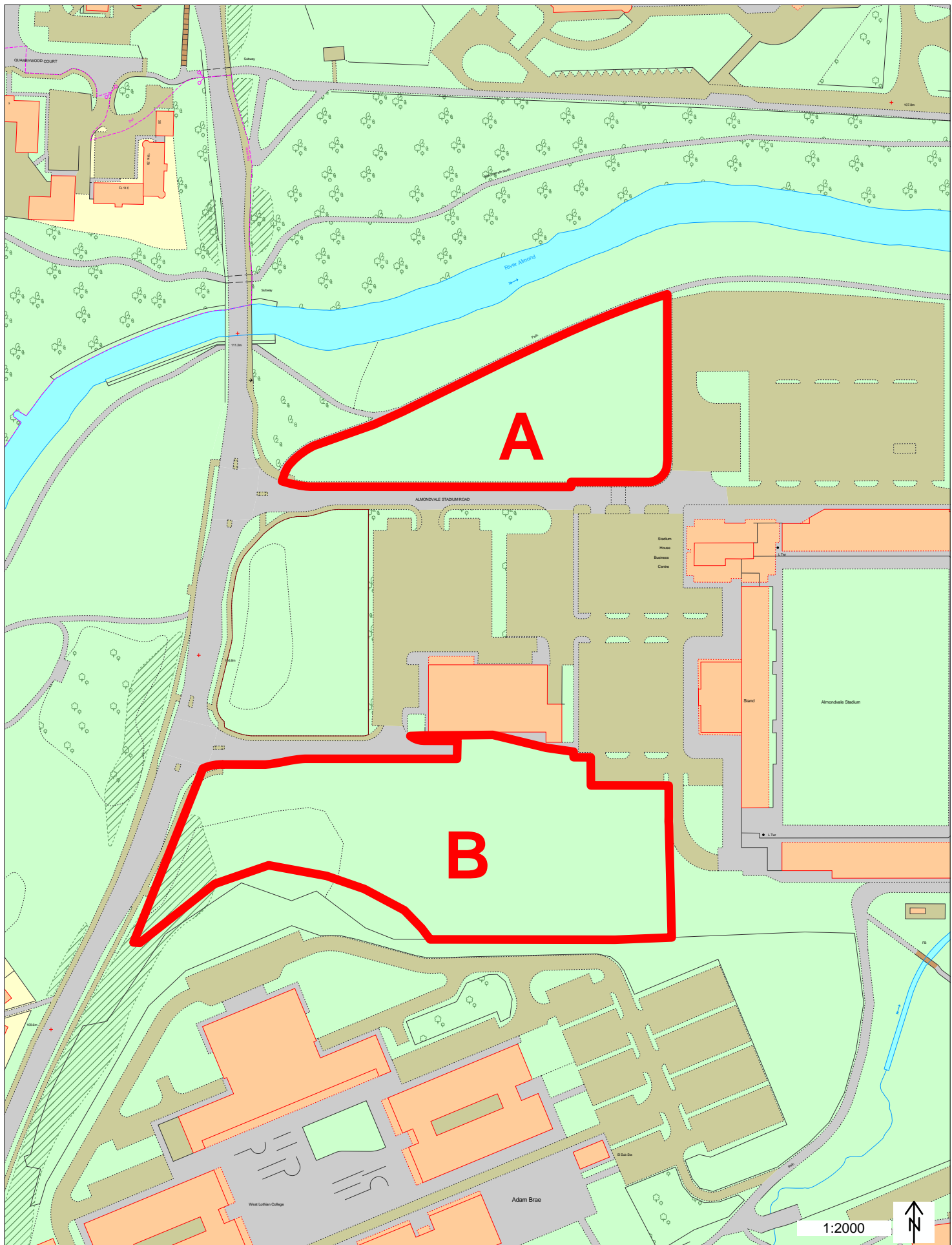
List of new build sites – Updated April 2014	Appendix 2	
	Account	No. houses
1. Wester Inch	General Services	80
2. Redhouse West	General Services	100
3. Kirkhill	HRA	230
4. Former Lammermuir House	General Services	80
5. Former School & Institute site, Pumpherston	General Services	15
6. Eastfield, Fauldhouse	General Services	30
7. West Main Street (Old School site), Broxburn	General Services	18
8. Bathville Cross, Armadale	HRA	21
9. Nelson Park, Armadale	HRA	26
10. Glasgow Road (Windyknowe), Bathgate	HRA	10
11. Almond Link Road (Civic Centre Junction), Livingston	General Services	30
12. Winchburgh CDA	Developer	41
13. Drumshoreland, Pumpherston	General Services	82
14. Mill Road, Linlithgow Bridge	General Services	30
15. Almondell (Calderwood CDA), East Calder	Developer	36
16. Raw Holdings (Walker Group), East Calder	Developer	17
17. Deans South, Livingston*	HRA/Private/RSL	40
18. Almondvale Stadium (Sites A & B), Livingston	General Services	40
19. Appleton Parkway, Eliburn	Developer	10
20. Adelaide Street, Livingston	HRA	6
21. Former Day Centre, Winchburgh	General Services	8
22. Trim Track, Almondvale, Livingston	General Services	45
23. Auldhill, Bridgend	HRA	5
Total		1,000
Reserve sites		
1. Community Centre, Bathgate	General Services	6
2. Glen Road, Deans, Livingston	General Services	20
3. Rear of new Deans House, Livingston	General Services	10
4. Armadale CDA	Developer	40
5. Philpstoun Bowling Green	General Services	5
6. Deans South, Livingston	HRA/Private/RSL	64 - 200
Total		145 - 281
*Inclusion of Deans South in the programme is dependent on further consideration of the progress with land assembly in May/June .		

Appendix 3

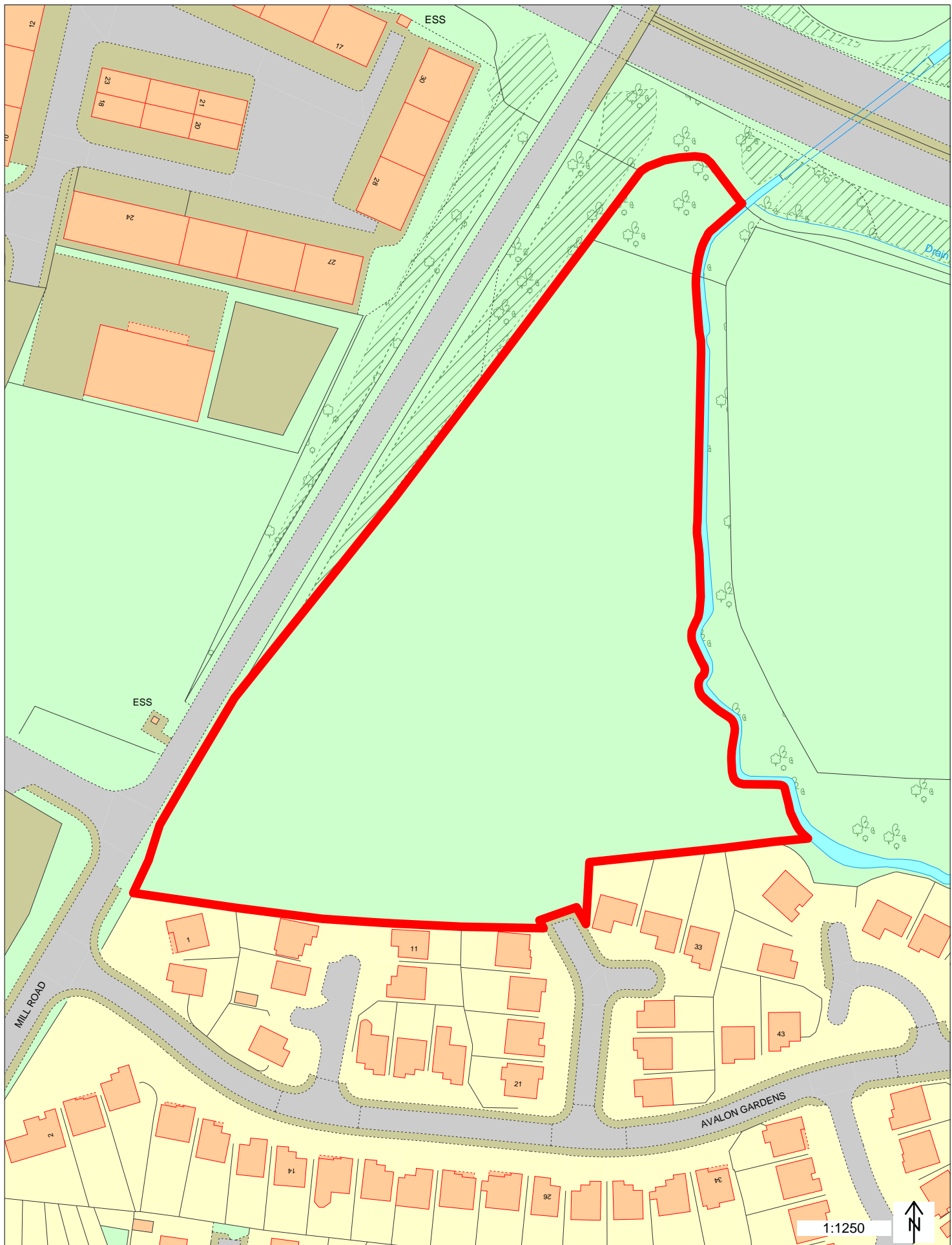
1. Appleton Parkway, Eliburn	-	10 units
2. Almondvale Stadium, Livingston	-	40 units
3. Trim Track, Almondvale, Livingston	-	46 units
4. Mill Road, Linlithgow Bridge	-	30 units
5. Adelaide Street, Craigshill	-	6 units
6. Former Day Centre, Winchburgh	-	8 units



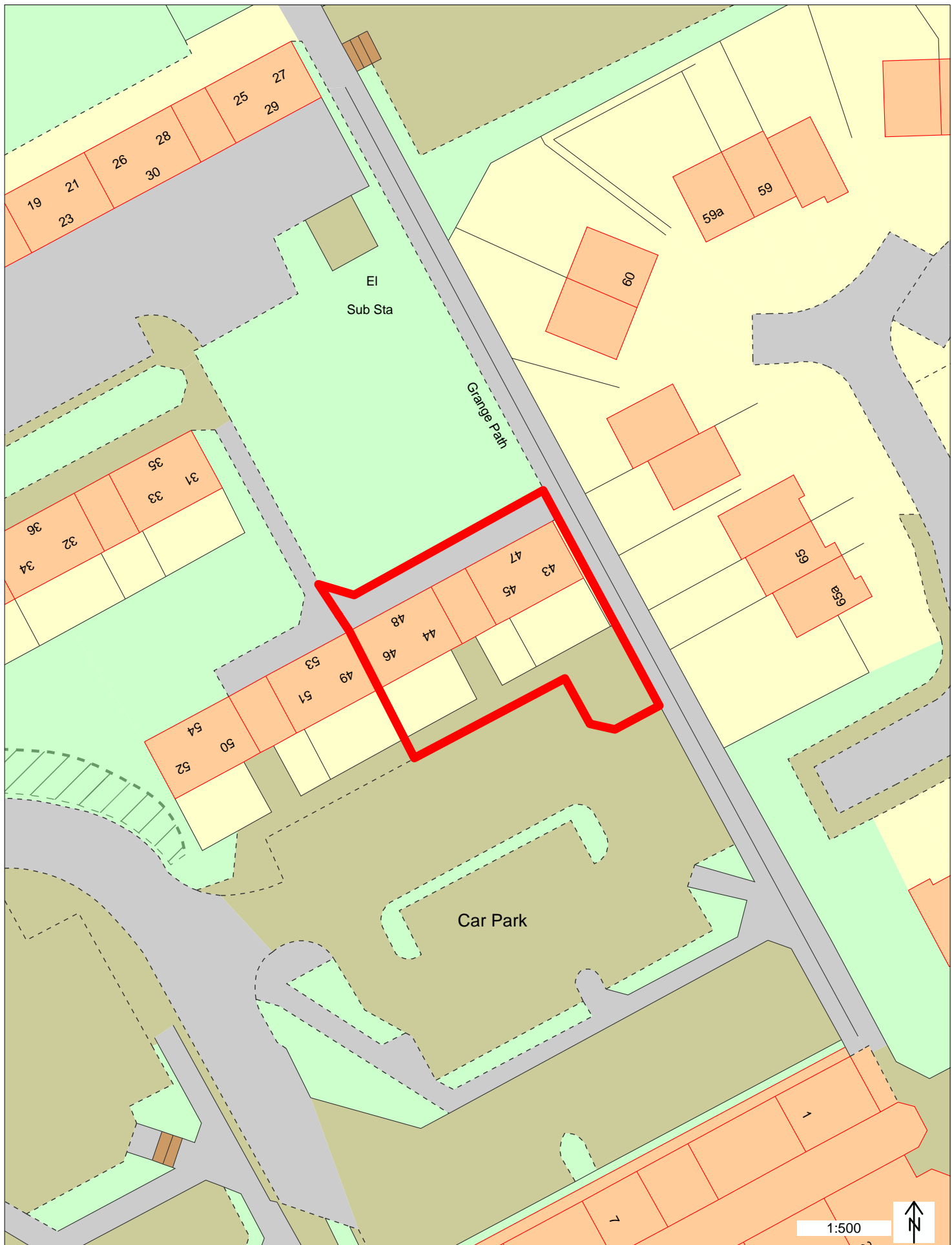
Appleton Parkway



Almondvale Stadium (sites A & B), Livingston.



Mill Road, Linlithgow Bridge.



43-48 Adelaide Street, Livingston.



Former Day Centre, Winchburgh.

Appendix 4

Ward	Current	Proposed	Change
Linlithgow	10	35	25
Broxburn, Uphall & Winchburgh	309	297	(12)
Livingston North	30	50	20
Livingston South	135	195	60
East Livingston & East Calder	172	156	(16)
Fauldhouse & Breich Valley	30	30	-
Whitburn & Blackburn	100	100	-
Bathgate	94	90	(4)
Armadaile & Blackridge	94	47	(47)
Total	974	1,000	26



West Lothian
Council

COUNCIL EXECUTIVE

HOUSING ALLOCATION POLICY REVIEW

REPORT BY HEAD OF HOUSING, CONSTRUCTION AND BUILDING SERVICES

A. PURPOSE OF REPORT

The purpose of this report is to provide the Council Executive with an update on the progress of the review of the Council's Housing Allocation Policy and Points framework and present proposals for change.

B. RECOMMENDATION

It is recommended that the Council Executive endorses the proposals to change to the Housing Allocations Policy, and agrees that the report proceeds to an agreed period of consultation.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Focusing on our customers' needs Providing equality of opportunities Making best use of our resources Working in partnership
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Housing (Scotland) Act 2001
III	Implications for Scheme of Delegations to Officers	None
IV	Impact on performance and performance Indicators	None
V	Relevance to Single Outcome Agreement	Outcome 7 – We have tackled the significant inequalities in West Lothian Society
VI	Resources - (Financial, Staffing and Property)	None
VII	Consideration at PDSP	Considered at PDSP 8 th April 2014 where it was agreed to refer the report to the Council Executive for agreement to proceed to consultation.

To note that the Panel supported the proposals for consultation, but that Danny Mullen (Tenants Panel Representative) and Councillor Anderson did not support amending the Council's policy in line with DWP (i.e. that children of same sex could share a bedroom up until the age of 16 and opposite sex children up to aged 10).

To note that the proposed Allocation Policy would be subject to an Equality Impact Assessment and that the outcome of the consultation would be reported back to the Services for the Community Panel in due course.

VIII Other consultations

None

D. TERMS OF REPORT

D.1 Background

The Housing Allocation Policy is a strategic policy document that explains how the council addresses a wide range of housing needs in the area. It has a crucial part to play in promoting sustainable and inclusive communities, promotes equal opportunities, incorporates good practice guidance and adheres to legislative requirements in accordance with the Housing (Scotland) Act 1987 as amended by other law, in particular the Housing (Scotland) Act 2001, which determines the council's statutory duty in relation to Allocations and Homelessness.

The policy is aligned to a wide range of other council strategies and policies. For example, the Housing Allocation Policy aims to promote objectives contained in the council's Local Housing Strategy as well as its Homelessness Strategy. This policy is, therefore, part of a holistic approach to addressing housing need in the local area.

D.2 Current Housing Allocation Policy

The existing Housing Allocation Policy has successfully focussed on assisting those applicants with a wide range of housing needs, taking account of best practice and legislative requirements. The policy recognises the five legally recognised priority groups also known as reasonable preference categories, these include, applicants who are, Homeless, Overcrowding, have Large Families, or live in properties that are unsuitable or are below tolerable standard.

However, it is recognised that the way in which we categorised applicants historically and the system used to allocate our houses does not mean that we give these groups a reasonable chance of being offered housing.

There are currently 9,378 applicants on the housing list and annually the council has a turnover of 853 properties that become available for allocation. Applicants are categorised over three groups, Homeless Applicant, General Needs Applicant and Transfer List Applicant. Of this number 457(5%) are Homeless Applicants, 7,322 (78%) are General Applicants and 1,599 (17%) are Transfer List Applicants. The existing policy favours homeless applicants above all other categories with 60% of lets being allocated to this category.

Allocations to council tenants through the Transfer Led lettings approach when allocating new build housing means 24% of lets are being allocated to this category. This in turn has resulted in the opportunity for the other reasonable preference categories, to be allocated housing, to be further reduced. By adjusting the way in which we allocate our housing we will achieve a better balance and give greater opportunity to all categories being considered for housing.

D.3 Housing Allocations Policy Review

The aim of the Housing Allocations Policy review therefore, is to build on and further enhance the council's approach through continued promotion of good practice and the introduction of innovative solutions to meet people's needs and sustain communities.

Any review must also recognise and take account of any other factors that may influence the design of future policy. There are four main areas which should be considered as part of the Housing Allocations Review, these are;

- Welfare Reform - how changes in Welfare Reform will impact choices that people make regarding housing including size criteria and under occupation
- Homeless Prevention – ensuring the Housing Allocation Policy supports our housing options approach and supports early intervention and prevention
- Legislative Change – ensure the Housing Allocations Policy takes account of legislative change and is flexible to adapt to any future change
- 1000 New Houses – ensure demand for housing is met and properties allocated appropriately

The Housing Allocation Policy review will ensure that the council;

- Allocates its housing in a way that is fair and promotes equal opportunities
- Remains compliant with allocation law and promotes good practice
- Continues to improve its approach to meeting people's needs
- Delivers a range of Housing Options and choice that will prevent homelessness, recognises other factors and promotes balanced and sustainable communities

Examination of the existing Housing Allocation Policy has identified a range of areas for consideration for change.

- Introduce a new system to allocate housing

It is proposed that we move away from the existing Housing Allocation Letting system which is Points Based and introduce a Group plus Points approach. This would mean the introduction of a range of applicant groups which would take account of legal reasonable preference categories such as:

- **Homeless**
- **Overcrowding/large families,**
- **Unsuitable accommodation/ below tolerable standard**
- **Transfer**
- **General needs**
- **Out-with West Lothian**

Targets would be established against each group and houses would be allocated in order through a target based approach. Applicants would also receive housing need points to which they are entitled.

- Review the Points Framework

Existing points categories will require review in order to ensure points levels are appropriate and continue to meet legal priorities and local needs. Consideration is also required to address gaps in the points framework with the inclusion of additional categories such as mental health, armed forces, preferred area and under occupation. Any review will also require to take account of other areas for consideration such as Homelessness Prevention and Welfare Reform for example, the current policy allows for children aged 8 and over to be listed for their own bedroom, DWP states children of same sex can share a bedroom up until the age of 16 and opposite sex children up to aged 10, the proposal is to amend the age group to bring it in line with DWP.

- Review allocation approach for Homeless applicants

It is proposed that consideration be given to removing the current process of affording two offers of housing to homeless applicants and returning to the statutory position of one offer. It is also proposed that more choice of areas be given to homeless applicants to avoid tenancy failure and further promote sustainable outcomes. The proposed changes would allow homeless applicants the choice of area/areas, house type and heating for a period of 9 months. If there has been no offer within the 9 month period, areas would then be opened up to either the East or West of West Lothian, depending on the applicant's selection. The benefit of allowing applicants their own selection would allow them to be housed in the area of their choice, more tenancies would be sustained and communities would be settled. Giving one offer of housing in the community of choice would significantly reduce the number of appeals received. The majority of appeals are due to areas being offered that applicants do not want to live in. Further, it is proposed to incorporate a preventative approach through the allocation policy and related procedures to try to prevent homelessness occurring. This will be done through promoting housing options, allocating houses as far as possible based on applicant need and preference and through points allocations.

- Promoting Re-housing of Transfer Applicants

The new Groups plus Points Letting System enables us to set and review annual targets of lets to all the different groups. This will include setting a target of lets to be allocated to transfer applicants as the transfer category constitutes a separate group. For example, we can set a reasonably high target to ensure that transfer applicants with a range of needs are re-housed.

This will include tenants who are overcrowded, living in unsatisfactory housing and persons under-occupying their homes. This promotes, in turn, meeting our legal obligations as these needs are covered in law. This approach will include the 100% allocation of new build accommodation to transfers applicants as per the current policy.

For example, by releasing a reasonable target of new build accommodation to transfer applicants, then this will serve to meet two objectives, firstly, meeting the needs of tenants and, secondly, enabling other applicant needs to be met from houses released through transfers. One instance of this could be a transfer moving from under-occupied accommodation to a new build and releasing a larger house or flat to a housing list family that is currently overcrowded. This strategy, it is emphasised, will also promote our strategic objective of developing balanced communities.

- Lettings Plan

The revised Housing Allocation Policy will set the principles for the way in which the council will assess housing need and allocate housing. Targets will be set within the new Groups plus Points Letting System and detail of targets set will be contained within an annual Lettings Plan.

The lettings plan is a practical document that is used to set targets of lets to all applicant groups. The plan assesses the factors that comprise demand (current applicants, future applicants etc) and supply (re-lets, new build etc) for housing to ascertain what targets should be set for each group. The plan is applied to promote sustainable communities by regulating targets to avoid a preponderance of specific applicant groups in certain areas.

Each year there will be a review of targets of lets to all different groups based on review of demand and letting trends from the previous financial year. Proposed targets will be presented to PDSP and Council Executive for approval and implementation.

Sensitive Letting Approach

The proposed Housing Bill will allow social landlords to be more flexible in applying a sensitive let approach to properties. This can be done as and when a property becomes available and will allow a case to be put forward to apply “restrictions” when looking for a suitable tenant. This approach will help in sustainability and should give settled communities the assurance that as a social landlord we take long-term residents needs into account.

In general all aspects of Housing Allocation Policy will require review with any additional areas for consideration forming overall proposals for policy change which will then be incorporated into future consultation on proposed changes.

A summary of the advantages and disadvantages of the proposals are set out below:

Advantages	Disadvantages
<ul style="list-style-type: none"> • Improve existing policy 	<ul style="list-style-type: none"> • Changes in approach for Homeless Applicants may result in increased length of stay in temporary accommodation
<ul style="list-style-type: none"> • Allocate houses to all reasonable preference groups as well as meeting the needs of other groups with needs not covered in law 	<ul style="list-style-type: none"> • Developing a new way of understanding the allocation system, for both staff and applicants; this issue will be addressed, though, through the allocation implementation action plan.
<ul style="list-style-type: none"> • Promote preference and choice of applicants 	
<ul style="list-style-type: none"> • Promote a system that is transparent, easy to understand, fair and equitable 	
<ul style="list-style-type: none"> • Promote balanced and sustainable communities locally 	

It should also be noted that the new policy can be easily adapted in the event of the current Housing Bill becoming law and, indeed, the present policy will presage this by incorporating commitments to meeting the needs of under-occupying tenants.

The results from consultation will be reported back to PDSP and Council Executive, with a detailed final policy document presented for consideration and approval.

D.4 Next Steps

The next steps in the approval process are set out below:

Commence Consultation	May- August 2014
Report outcome of consultation and finalise policy document	September/ October 2014
Review Housing List	November 2014 – March 2015
Implement New Policy	April 2015

It is anticipated that the new Allocation Policy will be introduced from Spring 2015.

E. CONCLUSION

Assessment of the existing Housing Allocation Policy has identified pressures and gaps in process which highlight the need for change.

The areas identified and proposals for change will build on and further enhance the council's approach and develop innovative solutions to meet the needs of a greater proportion of people seeking housing in West Lothian whilst, at the same time promoting balanced and sustainable communities.

F. BACKGROUND REFERENCES

Appendices/Attachments: Appendix 1 -- Housing Allocation Policy

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Alistair Shaw - Head of Housing, Construction and Building Services
15th April 2014

West Lothian Council
Housing Allocation Policy

This document is available, on request, in a range of different formats such as in larger print, audio-format and Braille and in different languages, as appropriate.

Contents

Page

Section 1: Background issues	3 - 4
Section 2: Allocation objectives	5 - 6
Section 3: Legal and good practice framework	7 - 11
Section 4: Other related policies	12 - 14
Section 5: Allocation system: key elements	15 - 25
Section 6: Promoting equal opportunities	26- 27
Section 7: Training and development	28
Section 8: Managing our allocation performance	29 - 31
Section 9: Our appeal and complaints system	32
Section 10: Reviewing the allocation policy	33
Appendices	34
Appendix 1: Guidance: law and good practice	
Appendix 2: List of policies to which allocation policy is linked	
Appendix 3: Useful contacts	

Section 1: Background issues

This section describes the context that explains why the allocation policy has been developed. This section also describes how this policy is structured.

1.1. Context

The allocation policy is a strategic policy document that explains how we address a wide range of housing needs in the West Lothian area. Although this policy is part of housing management practice, allocation practice has a crucial part to play in promoting sustainable and inclusive communities. Sustainable and inclusive communities are areas in which people want to live and work. These areas foster social justice and the elimination of all forms of discrimination.

This policy is based mainly on allocation law but also promotes other legislative provisions, for example, those relating to equal opportunities. The policy also incorporates good practice guidance, including guidance issued by the Scottish Government.

Allocation policy is also aligned to a wide range of other council strategies and policies. For example, the allocation policy aims to promote objectives contained in the council's local housing strategy, as well as its homelessness strategy. This policy is, therefore, part of a holistic or unified approach to addressing housing need in the local area.

Notes

The term "allocation" is a technical term and refers simply to the policy and practices concerning the **letting** of houses.

West Lothian Council will generally be referred to as "we" throughout this document.

The word "house" is used in the Scottish sense and is intended to refer to all house types unless this is otherwise stated.

1.2. Structure

This policy is divided into a number of sections to make the document more accessible; this also enables us to update the document more easily as required, for example, due to changes in allocation or housing law. The main issues covered by each section are summarised below.

Section 2 is a very important section as it describes the key allocation objectives of this policy. These objectives are the framework on which all of our practices are based, for example, commitments to meeting law.

Section 3 sets out, in plain language, the main law and good practice guidance that the allocation policy must satisfy. This is essential as the policy is based on allocation law and good practice guidance.

Section 4 summarises other organisational policies that are linked to allocation practice. This is to explain clearly that allocation policy does not operate in isolation from our other services.

Section 5 explains how we let houses to applicants. This also explains important technical terms such as housing need. Applicants may be either existing tenants or applicants on the common housing register.

Section 6 covers our commitments to promoting equal opportunities through allocation practice. This includes a full explanation of the important principle known as positive action.

Section 7 outlines the types and variety of training that we carry out to ensure that our allocation policy objectives are implemented effectively.

Section 8 describes how we manage our allocation performance. This is achieved through having a range of performance indicators that allow us to monitor practice on an ongoing basis.

Section 9 explains the process for appealing allocation decisions and/or using our complaints system.

Section 10 covers our commitment to consultation on allocation policy review and describes how we review the policy.

Finally, the appendices provide general information for tenants and service users to allow them to check sources or make contacts with other organisations.

Section 2: Allocation objectives

2.1. General

This section is very important as it describes our main allocation objectives, that is, our practical commitments. These objectives are incorporated throughout the allocation system that covers the following parts:

- allocation policy;
- allocation procedures;
- allocation documentation, for example, our summary allocation policy; and
- other policies that are linked to allocations, for example, mutual exchanges.

2.2. Our allocation objectives

Our allocation objectives cover **twelve** core commitments; these are described below.

Objective 1: Law and good practice guidance

We meet all appropriate legal and good practice guidance standards.

Objective 2: Promoting equal opportunities

We promote services to ensure that there is no unlawful or unfair discrimination on any of the issues covered by equality law.

Objective 3: Addressing housing need

We define housing need comprehensively in our policy and use this definition to address a wide range of housing needs.

Objective 4: Developing sustainable and inclusive communities

We implement allocation practices to develop sustainable and inclusive communities in which people want to live and work.

Objective 5: Making appropriate use of our housing stock

We make appropriate use of our housing by promoting tenants' rights such as mutual exchanges and by reducing under-occupation.

Objective 6: Establishing effective partnerships

We establish partnerships, at local and national levels, to address the needs of individual service users, as well as community needs.

Objective 7: Minimising lost income

We let empty houses in line with set time scales to avoid unnecessary loss of rental income; these time scales are contained in our void policy (empty house policy).

Objective 8: Providing advice and information

We provide service users with comprehensive advice and information about our allocation services; this includes assisting applicants with information on their housing options.

Objective 9: Providing training and development programmes

We provide comprehensive training to our housing staff to ensure that allocation services are delivered effectively and efficiently. Training is also provided to tenant groups through our tenant participation strategy.

Objective 10: Managing allocation practices

We manage allocation practices through an internal audit system that is based mainly on performance indicators and appropriate satisfaction surveys.

Objective 11: Dealing with appeals and complaints

We deal with appeals and complaints fairly in line our organisational policy, including dealing with issues within set time-scales.

Objective 12: Consulting on the policy and its review

We review the allocation policy every three years or sooner, if appropriate; we do this in consultation with service users and other relevant partner organisations.

Section 3: Legal and good practice framework

3.1. General

This section summarises, in plain language, the main legal provisions that this policy includes. This covers both allocation law and other law. The section also refers to the main guidance that our policy promotes. Appendix 1 refers to the relevant law and good practice guidance.

3.2. Allocation law

This section summarises the main law on allocations that form the basis of the allocation policy. These provisions cover:

- access to our common housing register;
- groups to be given reasonable preference when letting houses;
- matters to disregard when selecting tenants;
- publicity; and
- access rights to information relating to the housing application.

(a) Access to our common housing register

People who are **sixteen** years or more can apply to join our common housing register. It is emphasised this does not give applicants a right to receive an offer of housing; offers of housing will depend on priority given to applications.

As part of our commitment to promoting equal opportunities, we offer to provide applicants with guidance as to how to complete our application form; we also offer support to applicants to assist them to complete this form, as appropriate. This includes meeting the legal duty of making reasonable adjustments in service provision when providing information to disabled applicants.

We also provide a wide range of information about our housing stock and housing options locally, as well as details of where further information can be obtained.

(b) Reasonable preference groups

We must give reasonable preference to certain groups when letting houses. The groups to which we must give reasonable preference are:

- homeless persons and people threatened with homelessness;
- people living in overcrowded houses or in large families;
- people living in housing that fails to meet the tolerable standard; and
- people living in unsatisfactory housing conditions.

Although these are the main needs with which our policy is concerned, there are various other housing needs that can arise. As recommended by good practice guidance, our policy also addresses these other types of needs (see section 3.4.).

It is also emphasised that there is separate law in relation to dealing with applicants from people affected by homelessness. We have, therefore, established a

homelessness policy to promote our legal duties and good practice guidance relating to homelessness. This policy is based on prevention and is aligned closely to our allocation system. This is explained in section 4.

(c) Matters to disregard when selecting tenants

We must disregard certain matters when we select tenants; these matters are as follows:

- the length of time that applicants have resided in our area;
- any debt related to a tenancy not owed by the applicant, or any housing debt since paid back;
- debt that is not related to housing, for instance, council tax arrears;
- the age of applicants unless housing has been designed or substantially adapted for (a) persons of a particular age or (b) persons to be in receipt of housing support services; and
- income of applicants or any property owned by them, including income or property of other household members.

When letting houses, we must also take no account of whether or not an applicant resides in our area if she/he:

- is employed, or has been offered employment in our area;
- wants to move into our area to look for employment and we are satisfied that this is their purpose;
- wants to move into our area to be close to a relative or carer;
- has special social or medical reasons for being re-housed in our area; and
- wants to live in our area to avoid harassment or the risk of domestic violence, or runs the risk of domestic abuse and wishes to move into the area.

In law, there are three main conditions that we cannot impose, namely that:

- applications must be active for a minimum period before considering applicants for housing;
- a judicial separation order should be obtained; or
- applicants should no longer be living with, or in the same house, as someone else before they can be considered for housing.

When letting houses, we must also disregard any arrears of rent less than one month's rent. This means that the rent arrear will not stop an offer of housing being made. If an applicant is re-housed who owes us rent, we make appropriate repayment arrangements before the offer is made. This procedure is incorporated into our rent arrears policy.

If rent arrears are more than one month's rent, this will not stop an offer of housing being made if applicants:

- agree an arrangement with us to repay the debt;
- pay the amount as agreed for at least **three** months; and
- continue to pay this amount.

As noted, this is incorporated into our rent arrears policy and repayments are linked to what are affordable to the person in arrears.

Note

Councillors (Elected Members) are not permitted to take part in allocation decisions (a) involving local authority housing within their ward or (b) applications for housing that is part of their ward. This also extends to other housing to which the council can nominate applicants, for example, housing of local housing associations. Elected Members can, however, make representations to appropriate committees regarding their views on these matters.

(d) Publicity

In law, we must both make and publish an allocation policy. This includes information governing:

- prioritising our allocation of houses among different applicant groups;
- transfer applicants, that is, how we deal with transfer applications; and
- mutual exchanges that are concerned with existing tenants who want to exchange tenancies (“swap homes”).

We must publish alterations to these rules within six months of making any alterations.

We keep copies of our allocation policy at our principal offices and at all of our housing offices. This is a legal requirement. These rules are available for checking at all reasonable times. For instance, summary rules can be obtained during working hours, or available on our website. We provide a copy of the allocation policy to all applicants in summary form free of charge. Applicants are also given a copy of the full policy free of charge, on request.

In order to promote access to our common housing register, we also keep copies of our allocation rules at a wide range of other offices and organisations. Examples of these are local libraries and other organisational offices.

(e) Access rights to information relating to the housing application

Applicants may access information that they have supplied as part of their application. This information must be provided free of charge.

Applicants may also apply to access personal information that we process in line with the **Data Protection Act 1998**. We may refuse any requests to access personal information only as permitted by this Act. We are entitled to charge for this information and details are contained in our policy relating to data protection.

3.3. Other law

Our allocation policy is based on (and largely determined by) housing law that covers legal provisions relating to allocating housing and homelessness. Our policy is also influenced by a wide range of other laws. Examples of these laws are summarised by reference to the key issues of:

- data protection;
- equality opportunity; and
- family law.

Note

Other law is also relevant such as law relating to immigration and asylum seekers and law concerning offenders. Appendix 1 provides a more detailed reference of a wider range of law that we take into account when developing this policy.

(a) Data protection

We include data protection principles throughout allocation practice so that information gathered is processed in accordance with law. For example, information that is gathered is only shared with the express consent of applicants, or as otherwise permitted or required in law.

(b) Equal opportunity

Allocation policy is a key document for promoting council commitments to promoting equal opportunity, including taking steps to eliminate unlawful or unfair forms of discrimination. This commitment covers all of the grounds in law (now known as “protected characteristics”), as well as other possible forms of discrimination such as discrimination on social origin or class. Further information on how we do this is contained in sections 6 and 8.

One example of how we promote equality matters is to have housing application forms available at all principal council offices, as well as at housing offices and on our website. Our application can be made available in different languages and in other formats such as larger print.

In order to explain the questions in our application form, we can also arrange appropriate services to make it accessible to other people such as:

- arranging for interpreting services to disabled people or persons who require information in another language; and
- providing the information in other formats, for example, in audio-format or Braille.

(c) Family law

Family law is extremely important to protect the rights of individuals. For instance, we provide information to people involved in relationship breakdown to ensure that appropriate housing options are considered. This includes information to spouses, civil partners and cohabiting partners (of the same or opposite sex). Advice and information concerning housing options is also made available, it should be noted, to single people.

3.4. Good practice

Good practice guidance to ensure that allocation practice meets quality standards is contained in a diverse range of documentation. Two key documents whose principles are embedded into allocation policy and practice are:

- the Scottish Social Housing Charter standards; and
- the Scottish Government guidance on allocations.

The Scottish Social Housing Charter standards

We embed the Scottish Social Housing Charter standards into this policy. Full information is provided in Appendix 1.

The Scottish Government Guidance

The Scottish Government has produced a Guide (Social Housing Allocations: A Practice Guide, 2011) that describes what social landlords are required to do to promote good practice. This includes social landlords being aware of local issues through a robust analysis of housing needs' information and to use their allocation policy to address such issues. Our policy takes account of the Guide's recommendations and has incorporated many of these into our overall allocation system (allocation policy and/or allocation procedures).

3.5. Summary

Our allocation policy and its related procedures are based on allocation law, other law and good practice guidance. This is very important for two reasons. Firstly, this enables us to meet our statutory duties. Secondly, this ensures that we promote allocation services that contribute to meeting our corporate goal of developing inclusive and sustainable communities.

Section 4: Other related policies

This section describes three policies of specific relevance to allocations; while Appendix 2 lists the full range of policies to which allocation policy is closely linked. This includes a wide range of council policies, both at organisational level and within housing services itself.

The policies summarised below are:

- harassment;
- mutual exchanges; and
- suspension of offers.

The section below summarises only the main aspects of each policy; full details are available publicly in separate policies and related procedures.

We have also noted beside each heading what policy objectives these address.

4.1. Harassment (Policy objectives: 1 and 2)

We regard harassment on any grounds as being inappropriate and we have established a comprehensive harassment policy to explain what harassment is; and how incidents of harassment are addressed through our specific housing policies. The harassment policy recognises that harassment can take many forms and so each incident must be assessed separately and dealt with using the appropriate remedy.

Allocation policy may be used, for example, to move those affected by harassment away from the area in which it is taking place (see section 5).

Examples of other policies that we use to address harassment are:

- our anti-social behaviour policy; and
- our estate management policy.

The harassment policy also enables us to address harassment on specific grounds contained in the Equality Act 2010. These grounds that are known, in law, as protected characteristics are:

- age;
- disability;
- gender re-assignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

We may also address harassment that could occur on other grounds such as harassment on grounds of someone's social origin or class, their personal characteristics or language.

A key objective that we promote is to adopt a supportive approach to people experiencing harassment; this includes providing them with access to information to consider and seek appropriate remedies.

4.2. Mutual exchanges (Policy objectives: 1, 3, 4 and 5)

Scottish secure tenants are entitled to apply to exchange their tenancies ("swap homes") with other Scottish secure tenancies anywhere in Scotland.

Although tenants must first obtain our written consent before the exchanging homes, we can refuse consent only if it is reasonable to do so.

We take account of reasons contained in law when considering applications, as well as other grounds that might be relevant. Each case is assessed individually taking account of the particular circumstances of the case. Full details are contained in our separate mutual exchange policy and its related procedures.

After we receive an application to exchange homes, we must provide our written decision within **one month**. If we don't formally reply within this time scale, consent is deemed to have granted. If we refuse an application to exchange homes, we must provide reasons in writing. This is important to enable tenants to consider our written response and to prepare an appeal against our decision. This appeal is to the sheriff court. In line with our commitments to a fair hearing under the Human Rights Act 1998, we provide tenants with their appeal rights when informing them of our decisions.

4.3. Suspension of offers (Policy objective 1)

We have established a separate suspension policy that sets out when we might suspend making offers to applicants who remain on our common housing register. There are three main reasons for suspending offers that relate to:

- an applicant's conduct;
- an applicant's eligibility; or
- deferred or delayed applications.

An applicant's conduct

We may suspend offers of housing to applicants if they are not complying with their tenancy conditions. For instance, we could suspend offering housing to a transfer applicant due to their anti-social behaviour that is causing a nuisance to other tenants.

In the case of rent arrears, we may suspend offers only if arrangements to repay are not made and kept to as discussed in section 3.

If we suspend offers to applicants, this is subject to time scales as set out in our suspension policy.

In line with our commitments to a fair hearing, applicants can appeal our decision as

explained in section 9.

An applicant's eligibility

We may suspend offers of housing to applicants who fail to qualify for housing due to particular allocation policy rules. For instance, offers might be suspended if applicants do not meet the age or support criteria required to access specific housing types such as sheltered housing.

Deferred or delayed applications

An application could be deferred if an applicant wants to register on the common housing register, but does not want to housing at present.

An application can be delayed if an applicant supplies insufficient information to enable us to process the application.

4.4. Summary

This section explains how we have established a number of specific policies and procedures to cover particular aspects of allocation practice. An overview of the diverse range of policies to which allocation policy is connected is given in Appendix 2.

Section 5: Allocation system: key elements

5.1. Introduction

This is a very important section of the allocation policy as it sets out our rules on:

- housing need;
- assessing housing need;
- our allocation system, including key procedures;
- our points system;
- local lettings initiatives; and
- partnerships with other social landlords.

5.2. Housing need

Housing need refers to standards that we use to assess an applicant's housing circumstances. For example, it was shown how allocation law already defines certain housing need factors such as overcrowding or unsatisfactory housing (see section 3, 3.2. (b))

This section describes the various standards that we use to define housing need and covers a wider range of factors contained in allocation law. This is in line with good practice that recognises that housing need is also related to environmental and social factors, not simply housing conditions.

The standards that we use to define housing need are now explained by reference to standards that include legal, professional, socio-environmental and socio-economic standards.

Legal standards

Legal standards that we use to assess housing need exist in respect of homelessness, overcrowding and the tolerable standard. These standards are defined in law and we must meet such standards in practice, for example, we are required to deal with housing that does not meet the tolerable standard.

Professional standards

Professional standards relate to our own internal standards that can be higher than the legal standards. For example, in assessing overcrowding we consider a family that has to use their living room for sleeping accommodation as being overcrowded.

Socio-environmental standards

We recognise that people may be dissatisfied with their housing situation if the general environment in which they live is considered to be inadequate. This could include local infrastructure such as a lack of facilities, shops, schools, places of worship and/or transport links. For example, a person's house may be in good condition, but an applicant who is isolated due to lack of local amenities and inadequate transport systems may prefer to move to other areas. This type of housing need is closely connected to individual applicants' choices and preferences.

Socio-economic standards

This relates to housing need linked to affordability of housing. Applicants who cannot afford to pay for their accommodation costs may be in housing need. For example, a tenant may want to transfer to other housing as she/he under-occupies their accommodation and housing benefit does not cover the full rental costs.

5.3. Assessing housing need

We assess the various forms of housing need on an ongoing basis. We do this for three main reasons. Firstly, it is our statutory duty to evaluate levels and types of housing need in West Lothian. This also includes the needs of particular households for housing such as disabled people. Secondly, we use this information to amend our allocation practices, as appropriate, for example, to amend how we prioritise applications. Finally, we use information that we gather on housing need to inform applicants of their housing options. In practice we do this through our internal Lettings Plan. A Lettings Plan is our internal system to assess:

- the likely number of houses available for letting; and
- the number of applicants seeking access to that housing.

The Lettings Plan is used to set targets of lets to be made to our groups on a yearly basis.

5.4. Our allocation system, including key procedures

This section describes the type of allocation system that we have established to meet our allocation policy objectives. The second part of this section summarises key procedures to inform applicants of our practice. This section covers:

- groups plus points system and policy objectives;
- groups plus points system in practice; and
- key allocation procedures.

5.4.1. Groups plus points system and policy objectives

The groups plus points system has been selected as it enables us to promote our policy objectives effectively. This is now explained below by reference to policy objectives 1 to 5; the other policy objectives form specific sections.

Objective 1: Law and good practice guidance

We meet legal requirements by including the reasonable preference needs as separate groups within our groups plus points system. We also meet good practice guidance by establishing groups that take account of the wider forms of housing need described in section 5.2.

Objective 2: Promoting equal opportunities

We promote equal opportunities through a variety of ways, for example, we regard housing that is not accessible for disabled people as being unsatisfactory housing. This recognises that the barrier that disabled people experience relates to inadequacies of the housing in which they live. This approach also promotes the social model of disability in line with good practice guidance.

Objective 3: Addressing housing need

Our system has clearly defined housing need and uses this information to address a wide range of housing needs. By using groups, this enables us to ensure that targets of lets can be made to any of these groups and amended as housing need patterns change.

Objective 4: Developing sustainable and inclusive communities

Our system promotes this objective by spreading lets among a diverse range of groups that include different household types; this includes meeting the needs of existing tenants who may want to move house for a variety of reasons. This objective is also furthered as we align housing offers to applicant choice, whenever possible.

For example, we set an annual target of lets for all properties (new build and re-let accommodation) to transfer applicants to ensure that transfer applicants with a range of needs are re-housed. This will include tenants who are overcrowded, living in unsatisfactory housing and tenants who are under-occupying their homes. This promotes, in turn, meeting our legal obligations as these needs are covered in law.

This approach is also justified by our allocation policy principles of making best use of the housing stock as well as developing sustainable communities.

For instance, by enabling tenants who are **under-occupying** their present homes to move to new build accommodation, then this meets several objectives.

Firstly, tenants who are re-housed in housing that is not under-occupied may be more affordable, for example, due to housing benefit not being reduced due to under-occupation.

Secondly, re-housing existing tenants enables other applicants' needs to be met as they can be re-housed in the accommodation released through transfers. For example, overcrowded families moving into the under-occupied accommodation can address their overcrowded conditions.

Finally, it is emphasised, this approach promotes our strategic objective of considering the preferences of applicants when allocating houses.

Objective 5: Making appropriate use of our housing stock

We use the groups plus points system to include housing point factors that enable best use of our housing stock. For instance, we give under-occupation points to applicants who seek to move from council housing that is too large for their needs.

5.4.2. Groups plus points system in practice

Our system works by dividing applications into a number of appropriate groups. We then set a target of houses to be let to each group taking account of our policy objectives explained above. This target is assessed using our Lettings Plan as described above.

Applications are pointed individually using our points system and placed within one of the groups (see 5.5. below).

The priority that an application receives is not based solely on the level of points awarded, but on the priority given to each of the groups. This point is explained within the information pack that we give to all individual applicants.

Note

If applicants in the same group have the same points level, then priority is given to the applicant who registers first on the common housing register.

5.4.3. Key allocation procedures

This section summarises, in plain language, what happens once an application is completed and returned to us. It is noted that we also have established detailed organisational procedures that our staff apply so that applications are processed consistently and against set time scales. Applicants can access these procedures, on request.

This section covers the following issues:

- admission to the common housing register;
- processing housing applications;
- offers and allocating houses;
- reviewing applications; and
- information.

(a) Admission to the common housing register

We admit all applications from people who are sixteen or over onto our common housing register. This is in line with allocation law discussed above. This is not the same thing, though, as being offered housing that is determined by our allocation points system (see 5.5.).

(b) Processing housing applications

We provide applicants with a standard application form that we ask them to complete and return to us. This form is available at a wide range of locations, including our principal offices, housing offices and on our website. After receipt of the application, we assess details within and notify applicants of their details (points awarded and so on). This is done within five days. We provide applicants with information, in writing, unless otherwise agreed due to an applicant's specific access needs.

If applicants do not provide us with sufficient information to process their application, this may affect their re-housing prospects, or lead to the application being "delayed" in line with our suspension policy.

As part of our commitment to equal opportunities, we ask applicants of their access needs and liaise with them about any support services that may be needed. For instance, we may employ interpreters (or signers) to provide information to hearing impaired applicants.

We process personal information received in line with data protection legal requirements. For example, we only share applicants' information with other organisations if they have given written consent, or if this is allowed or required in law.

If we contact other landlords or lenders (in the case of home owners) to confirm application details, we will also first seek applicants' consent. If applicants do not provide consent to contact other landlords, and this information is relevant to an allocation, the application could be subject to suspension.

Home visits to check application details may be carried out before an offer is made. Such visits will be arranged in advance with applicants at appropriate times. This is in line with individuals' rights under human rights law, for instance, their right to privacy. If applicants live outside West Lothian, we may ask other landlords and/or agencies to check details.

Applicants can apply for a sole or a joint tenancy with someone else who is either staying with them, or is intending to stay with them. In order to promote information about tenants' rights, we can advise applicants of advantages and disadvantages of both tenancy forms.

(c) Offers and allocating houses

After we confirm application details, we point application forms and put the application into one of our specific groups. If offers can then be made, we base these offers on an applicant's priority and her/his stated preferences, whenever possible.

Our allocation system – in line with good practice – is based essentially on applicant preference or choice. For instance, when selecting tenants for housing, we consider their stated preferences in the application form covering things such as:

- area of choice from a list:
- type of housing and floor levels in the case of flats; and
- types of heating system.

We divide West Lothian into specific letting areas that applicants can refer to in selecting their areas of choice.

Specific information about local amenities can also be provided, on request. For example, applicants may not want to live in an area that is not easily accessible by public transport.

In order to ensure that applicants can make an informed selection, we also provide applicants with information on their re-housing prospects for different areas. For example, we use information gleaned through our Lettings Plan to inform applicants of numbers of houses likely to become available for let each year in different areas.

An important part of this process is to encourage applicants to adopt a realistic approach as widening their areas of choice may increase their re-housing prospects.

Certain types of housing are let only to meet specified needs. For example, we restrict allocations to sheltered housing to older people. This refers to housing specially designed and/or adapted for a particular age group. Similarly, we may restrict lets only to disabled people for housing that has been designed for disabled people. We also ensure that existing tenants receive priority when transferring to new build properties as based on their housing needs, including preference.

We have established a policy that covers access to housing with care, as well as a policy on the allocation of adapted housing. Information on these policies is available, on request.

(d) Reviewing applications

The purpose of reviewing applications is to find out if applicants still want to be re-housed by us. This enables us to keep the common housing register up to date and reduce unnecessary offers. This is an important part of our best value duty to provide services that are efficient and effective.

If you have not had contact with us within a twelve month period we will write out to you on the date of registration. For example, if someone joins our common housing register in March one year and has not updated or amended their application within the following twelve months, the application will be reviewed the following March.

Applicants are requested to advise us, in writing or other appropriate means within fifteen working days if they want their application kept on the common housing register.

A reminder letter is then sent out if we get no response; this allows the applicant another seven working days to reply. If no reply is given, we remove the application from the common housing register and a cancellation letter is sent advising of this.

Applicants whose applications have been removed because of failure to respond can have their original applications re-instated by writing a letter of appeal explaining the reasons for failing to respond. This must be done within six months of the application being removed from the common housing register.

After this six month period, applicants are requested to complete a new application form.

(e) Information

We provide all applicants with a standard information pack that is produced using plain language. This pack can be made available in different formats and/or in different languages, as appropriate. Applicants are responsible for notifying us of any changes in their circumstances. This is important as such changes may improve – or affect – their prospects of re-housing.

The information pack contains the following information:

- a summary of the allocation policy;
- application form and a guide how to complete it;
- information on particular rules, for example, applications involving accessibility or medical issues;
- details of our housing stock and its turnover;
- information on any lettings initiatives;
- details of where to get assistance; and
- details of where to return the form.

5.5. Our points system

Our points system is a groups plus system that is based on allocation law, the reasonable preference groups, and also good practice guidance. Our six main groups are people who:

- are homeless (see below about being threatened with homelessness);
- live in overcrowded houses (or large families);
- live in houses below the tolerable standard, or houses that are unsatisfactory;
- are on our transfer list;
- have general needs; and
- applicants outside West Lothian.

The points that we set for individual needs is given at the end of this section. (5.5.1)

Note

The phrase “threatened with homelessness” applies to applicants who are likely to become homeless in two months. We seek to prevent applicants becoming homeless provide detailed advice to applicants about their housing options.

5.5.1. The groups explained

This section explains each group and their relative priority within the system. Before doing so, **three** general points are made.

Firstly, an applicant can only be placed in one group. This is done to ensure that applicants can easily understand the system and avoid confusion. For example, if an applicant is overcrowded then her/his application is placed in the overcrowding group.

Secondly, although applicants are placed in one group, applications are awarded all relevant points to which they are entitled.

Thirdly, the priority that an application will receive will depend mainly on the priority afforded to each group, not simply the point level that individual applicants receive. We set a target of lets to be allocated to each group that is subject to ongoing review as needs change locally.

More information about this is provided in the application pack that is sent to each applicant.

Group 1: People who are affected by homelessness

Applicants in this group are assessed through the West Lothian Council homelessness policy and procedures. If an application is accepted onto Group 1 following the statutory homelessness assessment, then the application is registered from date of application.

Application priority is determined by date of registration and no further points are awarded.

Group 2: People who live in overcrowded houses (or large families)

Applicants in this group consist of people whose homes either fail to meet the statutory overcrowding standard (appendix 1), or our occupancy standard (Table 1).

Our occupancy standard is more progressive than overcrowding law as it:

- excludes the living room as being viewed as suitable for use as sleeping accommodation; and
- considers that children should have separate bedrooms over **Ten** (see below). (children of same sex would be expected to share a room up until the age of **Sixteen**)

Notes

Applicants whose homes are legally overcrowded and that this is causing ill-health could be eligible to apply for housing as homeless persons.

Our occupancy standard explains how many rooms are needed by households of different sizes. Applicants are granted points if their present house is deemed to be too small to meet their needs. The occupancy standard is also used to assess if a house is being under-occupied (see Group 5 below).

Occupancy standard

Household Size	Bedrooms required
Single person	One
Couple (of same or opposite sex)	One
Anyone else in applicant's household who is/are:	
Aged ten or over (Opposite sex)	One
Two people under Ten/same sex people up to sixteen	One
Any other person	One

Notes

A household refers to any person who wants to live on their own (or with someone else) For example, a family member wanting to apply for housing on their own would be a separate household.

Table 1 entails that, as soon as one child reaches Ten years of age, overcrowding points will be granted if the child has no separate bedroom and has to share with the opposite sex (aged Ten and over) same sex children up to aged Sixteen would be expected to share a bedroom. This is our professional assessment of overcrowding.

Other policy provisions relating to overcrowding

Any applicant could apply to move to other housing that does not reduce their overcrowding but could meet other needs. For example, they might want to live in another area for social reasons that are recognised in this policy as a form of housing need. In such cases, no overcrowding points would be granted.

We take account of people who normally live with the applicant but who are away temporarily when assessing overcrowding. This might include people working away, or in some institutional setting.

In the case of shared custody, the size of house that is offered to applicants will be determined by the terms of the actual arrangement. This is covered within our staff procedures and information is provided to applicants concerned.

Group 3: People who live in houses below the tolerable standard (BTS) or houses that are unsatisfactory

The BTS is a statutory standard and a house fails to meet this standard if it is defective regarding any of the relevant provisions (see Appendix 1 that describes this standard).

The term “unsatisfactory” is not defined in law. We use this term to refer to housing that is not suitable for disabled applicants due to their accessibility needs. For example, a house may not be accessible to a wheelchair user if it has not been adapted to meet their needs. Such housing is a barrier to meeting someone’s needs and is, therefore, unsatisfactory. Applicants with medical conditions are also placed in this group if their house does not meet their particular needs. Applications are assessed through our internal procedures and applicants are notified of this process through their information pack.

Group 4: People who are on our transfer list

We have established a transfer list that consists of existing West Lothian Council tenants applying to move to another house. This is very important to meet the following allocation policy objectives:

- meeting the housing needs of tenants in terms of their preferences since “wanting to move” home is a form of need;

- promoting sustainable and inclusive local communities by meeting tenants' preference needs; and
- making appropriate use of our stock by reducing under-occupation and also releasing housing for other applicants who require larger housing.

A range of points can be granted to tenants such as overcrowding points, unsatisfactory housing points and points for under-occupation. Only West Lothian Council tenants qualify for under-occupation points.

Group 5: People with general needs

This group consists of people with other housing needs in relation to:

- applicants whose houses face modernisation, closure or demolition;
- applicants to be re-housed through local support and care programmes; and
- other particular needs.

Houses facing modernisation, closure or demolition

If West Lothian Council require people to move homes due to their modernisation, closure or demolition programmes, then applicants are awarded points. Applicants may be able to return to their homes following modernisation works.

Re-housing involving support and care programmes

We work in partnership with a range of agencies, both statutory and voluntary, to provide local support and care programmes. In order to prevent homelessness, we grant applicants being re-housed through these programmes points.

Other particular needs

Other needs recognised within our policy include applicants:

- in insecure accommodation;
- in tied accommodation;
- in the armed forces;
- with shared amenities;
- wanting to move for affordability, social and employment reasons.

In the case of applicants fleeing harassment, we have established a separate harassment policy as discussed in section 4.1. This policy seeks to provide those affected by harassment with quality advice to enable them to make an informed decision regarding re-housing options. A point award may be made to applicants who seek to move house if – following detailed investigations – this appears to be the appropriate remedy. This serves to prevent homelessness and thus accords with one of key objectives. Harassment situations could include applicants fleeing domestic violence.

Note: Not covered in Allocations Policy

In allocation practice, it is possible that a situation arises that is not dealt with by our policy, for example, management transfers. In these cases, a point award may be granted following assessment of the particular circumstances. In order to ensure public accountability, such cases can only be authorised by the Head of Housing, Construction and Building Services or delegated senior manager. Following this allocation, the principles must then be adopted into the policy as part of its ongoing policy review.

Group 6: Applicants outside West Lothian

Applicants living outside West Lothian will be placed in one of the above groups if they satisfy the relevant legal rules. For example, residence in West Lothian must be disregarded when selecting tenants if any of the criteria below apply.

Local residence must be ignored if an applicant:

- is employed or has been offered employment in the area;
- wishes to move into the area to seek employment and we are satisfied that this applies;
- wishes to move into the area to be near a relative or carer;
- has special social or medical reasons for needing to be re-housed in the area;
- is subject to harassment and therefore wishes to move into the area; or
- runs the risk of domestic violence and therefore wishes to move into the area.

If an applicant lives outside of the West Lothian area and does not meet any of the above, the application will be placed in Group 7.

If an applicant lives outside of the West Lothian area and meets any of the above, then the application will be placed in one of other Groups.

Points are added for each application to ensure that priority is assessed on overall housing circumstances of each application.

5.5.1 The Points Framework

Homeless		
	Assessment of applicant as being statutorily homeless	Nil points: assessment of need based on date of presentation
Unsatisfactory Housing		
Below tolerable standard	Property does not meet the legal standard	200
Property need assessment A	Property does not meet applicant needs and there is an urgent need to move	200
Property need assessment B	Property does not fully meet applicant needs	150
Overcrowding/Large Families		
Overcrowding	Based on bedroom deficiency in line with family composition, including age on who can share a bedroom	100 (for each room required)
General Needs		
Under-occupation	Based on each bedroom that is unoccupied (social housing tenants only)	200 (for each bedroom under-occupied)
Sharing	Based on applicant's household composition and amenities shared with other households	100 per person
Support	Based on applicant's need to give or receive support	100
Mental Health	Based on applicant's need to move for mental health reasons	100
Threatened with Homelessness and Insecurity of Tenure		
	Leaving hospital, forces, or care ("looked after children"); Rehabilitation, Forced Sale/Notice to Quit, Harassment	250
Preferred area		
	1 area can be selected by applicant as their preferred area of choice to reside in	100

Local Lettings Initiatives

These are promoted under good practice guidance and can be used to address:

- anti-social behaviour;
- low demand housing; and
- unemployment.

Unemployment levels are assessed using internal data that is gathered from various sources, including:

- applicant information forms;
- census information; and
- housing benefit information.

We publish details of any initiative that we seek to so that tenants and other residents understand how the initiative meets legal rules, as well as processes involved.

Before we initiate a lettings initiative, we will:

- base its proposals on a sound rationale using clear statistical data sources;
- consult with tenants to obtain their agreement;
- discuss issues with our partners;
- implement a quality monitoring system; and
- review any initiative on an ongoing basis.

5.7. Partnerships with other social landlords

We have established partnership arrangements with other social landlords through our common housing register. Details of how these partnerships operate are contained in:

- information that we supply to applicants through the information pack; and
- internal organisational protocols that govern the partnership working arrangements.

5.8. Summary

This section explains that we operate a groups plus points allocation system. This system is most appropriate for ensuring that we promote law and good practice guidance effectively.

Section 6: Promoting equal opportunities

6.1. Promoting equal opportunities: general

We promote equal opportunities throughout all of our housing services, including allocation practice. As allocation policy objective 2 states, we seek to ensure that allocation practice does not discriminate either unlawfully or unfairly.

We promote equal opportunities in our allocation policy in a range of ways by:

- providing information about the policy and related services in accessible ways, for instance, producing a summary allocation leaflet in plain language;
- working in partnership with other agencies to promote sustainable tenancies, for example, delivering appropriate support services tailored to individuals' needs;
- monitoring service provision to evaluate that allocation practice is not discriminatory, for instance, through our performance indicators; and
- implementing positive action programmes to promote access to our services (see below).

6.2. Positive action programmes

Positive action programmes are different from positive discrimination that is, generally, unlawful. Positive action refers to initiatives that are undertaken to address historic forms of discrimination against particular groups. For example, disabled people and people from black and minority ethnic groups have traditionally experienced various forms of discrimination in housing. It should be noted that these are examples only and other people affected by discrimination include gay men and lesbian women.

Our positive action programmes are developed continually to address locally identified needs and present initiatives include:

- publishing the allocation policy in other formats and other languages, as appropriate;
- auditing the allocation policy against corporate equality standards (plain language, accessible formats and so on) to ensure that we promote equality objectives;
- publicising the allocation policy widely to promote access to the common housing register, as well as increasing awareness of its content and objectives;
- establishing active partnerships to promote awareness of barriers to accessing housing, for instance, promoting awareness of the social model of disability; and
- monitoring services so that there is no unlawful or unfair discrimination on any of the grounds covered in the Equality Act 2010 or the Scotland Act 1998.

Note

The Scotland Act 1998 defines equal opportunity as follows:

“Equal opportunities” means the prevention, elimination or regulation of discrimination between persons on the grounds of sex or marital status, or racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions such as religious beliefs or political opinions”

(The Scotland Act 1998, Schedule 5, L2)

6.3. Summary

We are required, as a public body, to take steps to eliminate unlawful forms of discrimination and promote equality of opportunity.

We do this in allocations by developing accessible services and seeking to address the needs of a wide range of households, including those that have traditionally experienced discrimination in service delivery.

Section 7: Training and development

7.1. Our training programmes

We provide comprehensive training so that allocation services are delivered both effectively and efficiently. This means that we must provide services that meet quality standards and offer value for money.

In order to meet this objective, we provide a range of training that is tailored to the jobs of individual staff and their role in allocation services.

Different types of training should be provided, for instance, to cover activities such as:

- advising people affected by harassment of how this might be addressed through allocation policy;
- administrative tasks such as in-putting application data onto the computer;
- advising applicants of their housing options; and
- assessing and monitoring regular reports on allocations made to ensure that there is no discrimination in our services.

In order to implement our training objectives effectively, we have established a range of training programmes that are also used to promote tenant participation (see section 10).

Examples of these training programmes are:

- legal training on issues related to allocation and housing law and other relevant law such as law on harassment;
- allocation policy and procedures training;
- training on using information technology systems;
- monitoring and assessing data collected as part of allocation practice; and
- general skills development for staff dealing with the public, for example, conducting effective interviews and quality customer care training.

7.2. Summary

We recognise that training should be seen as a developmental activity and our staff receive a wide range of training that is tailored to their particular job needs.

Section 8: Managing our allocation performance

8.1. Managing performance: general information

In order to manage allocation performance effectively, we have established management measures as follows:

- data gathering and assessment;
- feedback from tenants and other service users;
- consultation;
- performance indicators; and
- reporting systems.

8.2. Data gathering and assessment

We gather a wide range of data as part of the allocation service, for example, numbers of applicants and lets to different applicant groups. In order to evaluate these data in an evaluative way, we assess data both quantitatively and qualitatively. This is explained below.

Quantitative monitoring involves measuring data by reference to numbers. For example, we monitor additions and cancellations of applications to our common housing register to assess demand for housing.

Qualitative monitoring is concerned with quality issues and would include things such as (a) accuracy of advice that we provide to applicants, or (b) quality of written documentation that we provide.

The issues that we monitor in practice are shown below in 8.4.

8.3. Feedback from tenants and other service users

We also gather information on our allocation service through our tenants and service users. For example, we carry out regular satisfaction surveys to ascertain tenant views on the quality of our services.

8.4. Consultation

We use information that we gather to produce reports whose data can also be passed to tenants' groups, individual tenants and other service users such as housing applicants, as appropriate. This information, including data on performance indicators, is then used to inform active tenant consultation relating to policy review. For example, by providing tenants with accurate information about local housing needs' trends, this can inform debates on targets of lets to be afforded to the various housing groups (see section 5).

8.5. Our performance indicators

Our performance indicators measure issues both quantitatively and qualitatively.

(a) Quantitative monitoring

We monitor numbers of the following issues under the headings below.

Access to the common housing register

- applicants on the common housing register, including tenants seeking to transfer or exchange houses;
- new applications to the common housing register, including dealing with against set scales; and
- deletions from the common housing register.

Offers and lets of accommodation

- offers to applicants, including information on accepted and refused offers;
- offers suspended and reasons;
- allocations to each housing against targets; and
- tenancies by length of tenancies following allocation.

Equality monitoring

- equality information to identify applications, offers and lets by reference to factors such as age, disability, ethnicity and race and gender.

Note

Full information on the extent of equality monitoring is contained in our internal reports; these are available publicly.

Appeals and complaints

- appeals and complaints, including outcomes.

(b) Qualitative monitoring

This type of monitoring includes activities such as:

- the quality of our verbal advice and information about allocation matters; and
- the quality of our public information relating to written and electronic formats.

This includes meeting corporate quality standards such as producing information, as appropriate, that is:

- accurate;
- in plain language; and
- accessible to the needs of individual service users.

We also monitor specific issues to inform practice such as:

- reasons why tenants are seeking to transfer to other houses, or to exchange homes with other tenants; and
- reasons for offers being refused.

8.6. Consulting

We present information on allocation practice to Council committee in line with set time scales.

We also provide information on allocation matters to tenants and other service users through methods agreed as part of our tenant participation strategy.

8.7. Summary

Managing performance is an important part of our allocation policy and practice. Information that we gather is used to improve our services, as well as addressing any practices that could be discriminatory. Information on performance is also used to inform consultation with tenants and service users as part of allocation policy reviews.

Section 9: Our appeal and complaints system

We adhere to the Council complaints system that is based on a two stage system of complaints.

The Council also applies the statutory appeal system in relation to homelessness applications.

Section 10: Reviewing the allocation policy

The allocation policy is reviewed on an ongoing basis in line with Council procedures. The review of the policy is linked to our tenant participation strategy to ensure comprehensive consultation with tenants and other service users.

Appendices

Appendix 1: Guidance: law and good practice

Appendix 2: List of policies to which allocation policy is linked

Appendix 3: Useful contacts

(all to be inserted in due course)



West Lothian
Council

COUNCIL EXECUTIVE

CONSULTATION ON THE LOCAL FIRE AND RESCUE PLAN FOR WEST LoTHIAN 2014/2017.

REPORT BY HEAD OF HOUSING, CONSTRUCTION AND BUILDING SERVICES

A. PURPOSE OF REPORT

This report asks Council Executive to approve the West Lothian Local Fire and Rescue Plan for 2014/17.

B. RECOMMENDATION

Council Executive is recommended to give approval for the West Lothian Local Fire and Rescue Plan 2014/17.

C. SUMMARY OF IMPLICATIONS

I Council Values	<ul style="list-style-type: none">• Being honest, open and accountable• Focusing on our customers' needs• Making best use of our resources• Working in partnership
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	The production and Council approval of the Local Fire and Rescue Plan is a statutory requirement of the Police and Fire Reform (Scotland) Act 2012.
III Implications for Scheme of Delegations to Officers	None at this stage.
IV Impact on performance and performance Indicators	A suite of performance indicators will be established following final approval of the plan
V Relevance to Single Outcome Agreement	These measures support the outcome – We live in resilient, cohesive and safe communities.
VI Resources - (Financial, Staffing and Property)	The council contributes to directly and in partnership to the delivery of the plan
VII Consideration at PDSP	Services for the Community PDSP on the 5 February 2014 and 8 April 2014
VIII Consultations	None

D. TERMS OF REPORT

D.1 Background

Under the Police and Fire Reform (Scotland) Act 2012 Section 41E, the Scottish Fire and Rescue Service (SFRS) must prepare a Local Fire and Rescue Plan for each local authority area and submit it for approval to the local authority for which the plan relates.

At the time of the establishment of the new Fire and Rescue Service for Scotland a one year interim Local Fire Plan for each Local Authority area covering the period 2013/14 was developed and this was considered by the Services for the Community PDSP, and then approved by the Council Executive.

D.2 Scottish Fire and Rescue Service (SFRS) Local Fire and Rescue Plan for West Lothian 2014 – 2017

Following the publication of the SFRS Strategic Plan 2013-2016 and identification of national priorities within this, the Local Senior Officer for Falkirk and West Lothian has drafted the Local Fire and Rescue Plan for West Lothian 2014-2017.

In accordance with the Police and Fire Reform (Scotland) Act 2012, the plan sets out the following:

- Priorities and objectives for SFRS in connection with the carrying out duties in West Lothian of SFRS's functions
- The reasons for selecting each of those priorities and objectives
- How SFRS proposes to deliver those priorities and objectives
- In so far as is reasonably practicable, outcomes by reference to which delivery of those priorities and objectives can be measured
- How those priorities and objectives are expected to contribute to the delivery of any other relevant local outcomes which are identified by community planning
- Such other matters relating to the carrying out of SFRS's functions in West Lothian as SFRS thinks fit.

There are seven priorities identified within the Local Fire and Rescue Plan for West Lothian 2014 – 2017, these being:

- Local Risk Management and Preparedness
- Reduction of Dwelling Fires
- Reduction in Fire Fatalities and Casualties
- Reduction of Deliberate Fire Setting
- Reduction of Fires in Non-Domestic Property
- Reduction in Casualties from Non-Fire Emergencies
- Reduction of Unwanted Fire Alarm Signals.

D.3 Amendments to Local Fire and Rescue Plan for West Lothian 2014 – 2017

The West Lothian Local Fire and Rescue Plan recognises the strong and positive contribution that partnership working and community planning has on the direction and implementation of the plan. At the Services for the Community PDSP on the 5 February, the Scottish Fire and Rescue Service were asked to make a number of additional amendments to the draft Plan.

These were to demonstrate enhanced alignment to the priorities of the Single Outcome Agreement. The inclusion of specific and measurable improvement targets for West Lothian, to allow Panel Members to exercise their scrutiny function and to outline the summary of resources available to deliver the Fire and Rescue Plan. The revised plan was then recommended for approval by Council Executive by the Services for the Community PDSP on the 8th of April 2014.

E. CONCLUSION

This report provides Council Executive with the opportunity to consider the West Lothian Local Fire and Rescue Plan 2014/17 as a statutory requirement of the Police and Fire Reform (Scotland) Act 2012.

The Plan aligns to the priorities of the West Lothian Strategic Assessment on Community Safety and continues with the excellent partnership working on Community Safety which is evident in West Lothian.

With the addition of the amendments the Plan has been strengthened to ensure a strong local emphasis on partnership, delivery and adequate scrutiny.

F. BACKGROUND REFERENCES

Services for Community PDSP – 19 March 2013

Council Executive – 23 April 2013

Services for the Community PDSP – 5 February 2014

Services for the Community PDSP – 8 April 2014

Appendix: Two

Appendix 1 - Local Fire and Rescue Plan for West Lothian 2014-2017.

Appendix 2 – Consultation response on draft local Fire And Rescue Plan for West Lothian

Contact Person: Alistair Shaw

Alistair Shaw
Head of Housing, Building and Construction Services
15 April 2014



SCOTTISH
FIRE AND RESCUE SERVICE
Working together for a safer Scotland

LOCAL FIRE AND RESCUE PLAN FOR WEST LoTHIAN

2014-2017



**Working together
for a safer Scotland**



**West Lothian
Council**

Contents

Foreword

West Lothian Ward Profile

Introduction

Strategic Assessment

West Lothian Risk Profile

Local Operational Assessment

Priorities, Actions and Outcomes

1. Local Risk Management and Preparedness
2. Reduction of Accidental Dwelling Fires
3. Reduction in Fire Casualties and Fatalities
4. Reduction of Deliberate Fire Setting
5. Reduction of Fires in Non Domestic Property
6. Reduction in Casualties from Non Fire Emergencies
7. Reduction of Unwanted Fire Alarm Signals

Achieving Local Outcomes

Review

Contact Us

Glossary of Terms

Abbreviations

References

Foreword

Ensuring that all our citizens can live their lives safer is a high priority for West Lothian Council and that is why we welcome the Local Fire and Rescue Plan for West Lothian covering the period 2014 - 2017.

West Lothian Council and our Community Planning Partners have an excellent record of working in partnership with the Scottish Fire and Rescue Service to improve the safety of our communities and it is vital that this work continues during a period of change for the service. Much progress has been made over the last year and I am confident this will continue over the lifetime of this plan and beyond.

The service has set ambitious targets for improvement over the plan period, which we welcome. The targets will only be achieved through effective partnership working between the Fire and Rescue Service, the Council and the wider partnership working with our communities.

George Paul

Executive Councillor Services for the Community

Welcome to the Scottish Fire and Rescue Services (SFRS) Local Fire and Rescue Plan for West Lothian 2014 - 2017. This plan is the mechanism through which the aims of the [SFRS's Strategic Plan 2013 – 2016](#) are delivered to meet the agreed needs of the West Lothian communities.

The Local Fire and Rescue Plan sets out my priorities and objectives for the SFRS within West Lothian for 2014 – 2017 and allows local authority partners to scrutinise the performance outcomes of these priorities. SFRS will continue to work closely with partners in West Lothian to ensure we are all “Working together for a safer Scotland” through targeting the risks to our communities at a local level.

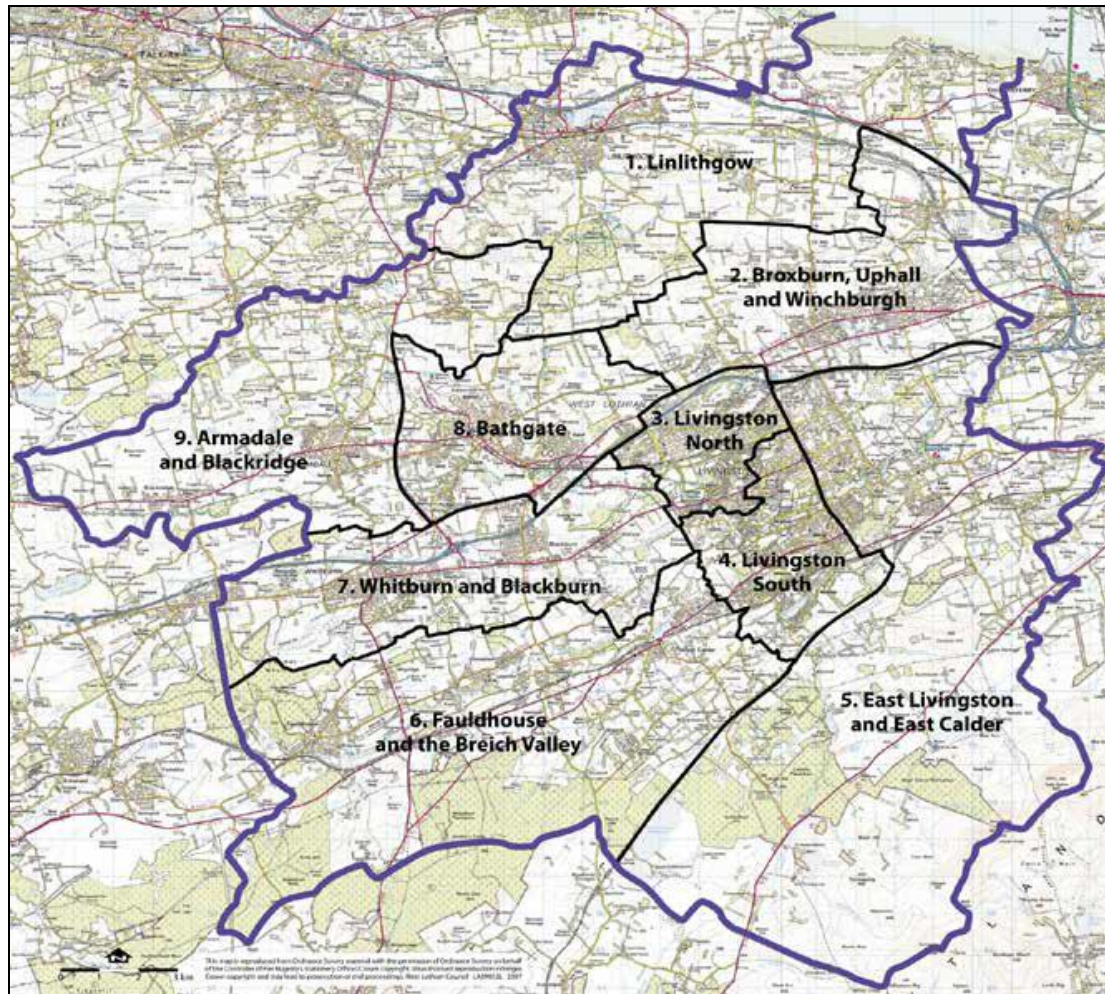
The Local Fire and Rescue Plan and its associated action plans are aligned to the Community Planning Partnership structures within West Lothian. Through partnership working, I aim to deliver continuous improvement in performance and effective service delivery in SFRS's area of operations.

The SFRS will continue to use data analysis techniques to identify risk and to ensure resources are allocated to the point of need within West Lothian communities. While considering the strategic priorities of the SFRS we will develop local solutions to local needs, and ensure equitable access to Fire and Rescue resources. Through our on-going involvement with local community safety groups in West Lothian, we will continue to develop our understanding of local needs and proactively seek out consultation opportunities with all sections of the community. Using this approach we will ensure that the service we deliver is driven by consultation, in line with public expectations and helps to build strong, safe and resilient communities.

Gary Laing

Local Senior Officer for Falkirk and West Lothian

West Lothian Ward Profile



Ward Area	Fire Station Locations
Ward 1 – Linlithgow	Linlithgow
Ward 2 – Broxburn, Uphall and Winchburgh	Broxburn
Ward 3 – Livingston North	Livingston
Ward 4 – Livingston South	West Calder (Polbeth)
Ward 5 – East Livingston and East Calder	Whitburn
Ward 6 – Fauldhouse and the Breich Valley	Bathgate
Ward 7 – Whitburn and Blackburn	
Ward 8 – Bathgate	
Ward 9 – Armadale and Blackridge.	

SFRS Resources Based in West Lothian

Two fire appliances are located at Bathgate Community Fire Station which is staffed by a mixture of Whole-time firefighters who are located at the station 24 hours a day, seven days a week, and Retained Duty System (RDS) firefighters who provide a 24 hours a day, seven days a week emergency on call response.

Two fire appliances are based at Livingston Community Fire Station which is staffed by mixture of Whole-time firefighters who are located at the station 24 hours a day, seven days a week; Day Duty firefighters who are located at the station Monday to Friday, during day periods, and RDS firefighters who provide emergency on call response outside of the working hours of the Day Duty firefighters.

One fire appliance is based in each of the remaining four Community Fire Stations; Linlithgow, West Calder, Whitburn, Broxburn. Each of these stations are staffed by RDS firefighters who provide a 24 hours a day, seven days a week emergency on call response.

RDS firefighters are employed on a part time basis and provide a vital service to the community in which they live or work. Most of our RDS firefighters are women and men who have primary employment in another field, but in addition to their full time job, they provide the same range of emergency services as their Whole-time colleagues.

A team of community safety engagement staff work across West Lothian to support their station based colleagues in delivering the wide range of preventative, awareness and engagement activities. Coordinating this activity is a Local Authority Liaison Officer (LALO), who is based at West Lothian Civic Centre and provides a direct link between West Lothian Council, Community Planning Partners and the Fire and Rescue Service.

Supporting the enforcement of fire safety legislation, within buildings other than domestic premises, are a team of highly trained Fire Safety Enforcement Officers who provide advice on fire safety matters, actively conduct fire safety audits of buildings, consult on building warrant plans and enforce compliance with fire safety legislation.

A management team has responsibility for service delivery and community engagement/enforcement across West Lothian. These officers are responsible for the effective service delivery across the area.

SFRS resources employed across West Lothian will aim to work in partnership and collaboration with other community resources to deliver better outcomes for communities. Sharing of information will be a key enabler in this process and will ensure that duplication of services is reduced and that community focused outcomes are aligned and delivered.

In addition to day-to-day resources based within West Lothian, it is a Strategic Aim of the SFRS that, as a single service, communities will have access to specialist skills and resources from across Scotland.

We will work with the other emergency services and voluntary groups within West Lothian that have an interest in emergency response and specialist rescue. This will allow us to identify resources, such as skills and equipment that are available nationally.

The table below indicates the staffing arrangements that support the delivery of the objectives detailed in the West Lothian Local Fire and Rescue Plan.

Whole-time Duty System Firefighter Establishment *	77
Day Shift Duty System Firefighter Establishment*	6
Retained Duty System Firefighter Establishment *	67
Prevention and Protection (Enforcement and Engagement) Staff Establishment ~	9
LSO Management Team Establishment~	10

Notes

**Based on antecedent Lothian and Borders Fire and Rescue Service Establishment levels.*

~ Based on SFRS interim working structure establishment.

The establishment levels indicated in the table above are subject to amendments and revisions as SFRS introduces revised staffing and crewing models.

Introduction

The Scottish Government provides an overarching vision for public services that focuses on the creation of a more successful country, with opportunities for all through a sustainable increase in economic growth.

This direction is supported by Strategic Objectives to make Scotland a wealthier & fairer, smarter, healthier, safer & stronger and greener place. Through a Concordat between the Scottish Government and the Convention for Scottish Local Authorities (COSLA), the Strategic Objectives have been expanded into [Local Single Outcome \(SOA\) Agreements](#), which include indicators and targets that provide the framework for how local authorities and their Community Planning Partners such as the SFRS will deliver services.

The [Fire \(Scotland\) Act 2005](#), amended by Part 2 of the [Police and Fire Reform \(Scotland\) Act 2012](#) provides the statutory basis for the SFRS to deliver a range of core services and functions that means while the service is ready to respond to fire and other emergencies, it also maintains a strong focus on prevention and protection arrangements to ensure the safety of our communities. The associated [Fire and Rescue Framework for Scotland 2013](#) sets the overarching strategic direction for the SFRS in the delivery of its services to the communities of West Lothian.

The Police and Fire Reform (Scotland) Act 2012 requires Local Fire and Rescue Plans to contain:

- Priorities and objectives for the SFRS in connection with the carrying out of its duties in the local authority's area of SFRS's functions
- The reasons for selecting each of those priorities and objectives
- How SFRS proposes to deliver those priorities and objectives
- In so far as is reasonably practicable, outcomes by reference to which delivery of those priorities and objectives can be measured
- How those priorities and objectives are expected to contribute to the delivery of any other relevant local outcomes which are identified by community planning,
- Such other matters relating to the carrying out of the SFRS's functions in the local authority's area as SFRS thinks fit.

Strategic Assessment

A strategic assessment for the SFRS's activities in Scotland established the type, frequency and impact of incidents that we attend. With this assessment in place, the Local Senior Officer (LSO) for West Lothian can effectively identify key priority areas for the SFRS to target its resources at a local level.

National Assessment

The Scottish Government, within their [National Performance Framework](#), have identified [16 National Outcomes](#) they wish to achieve. Through delivery of this Local Fire and Rescue Plan, the SFRS in particular will contribute to the following Outcomes:

- **National Outcome 1:** We live in a Scotland that is the most attractive place for doing business in Europe.
- **National Outcome 4:** Our young people are successful learners, confident individuals, effective contributors and responsible citizens.
- **National Outcome 6:** We live longer healthier lives.
- **National Outcome 8:** We have improved the life chances for children, young people and families at risk.
- **National Outcome 9:** We live our lives safe from crime disorder and danger.
- **National Outcome 11:** We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- **National Outcome 12:** We value and enjoy our built and natural environment and protect it and enhance it for future generations.
- **National Outcome 14:** We reduce the local and global environmental impact of our consumption and production.
- **National Outcome 15:** Our people are able to maintain their independence as they get older and are able to access appropriate support when they need it.
- **National Outcome 16:** Our public services are high quality, continually improving, efficient and responsive to local people's needs.

SFRS Strategy

The priorities for the SFRS have been laid out in the Fire and Rescue Framework for Scotland 2013 with the following Strategic Aims defined within the Strategic Plan 2013-2016:

- **Strategic Aim 1:** Improve safety of our communities and staff.
- **Strategic Aim 2:** More equitable access to Fire and Rescue Services.
- **Strategic Aim 3:** Improved outcomes through partnership.
- **Strategic Aim 4:** Develop a culture of continuous improvement.

Equality Assessment

On 30 April 2013, the SFRS published its [Equality Outcomes](#), in compliance with the [Equality Act 2010](#) (Specific Duties) (Scotland) Regulations 2012. The SFRS Equality Outcomes are:

- **Outcome 1:** People from all Scotland's community groups feel confident in contacting the SFRS for advice and information on relevant non-emergency issues.
- **Outcome 2:** Disabled, LGBT, BME, older people and people from minority faiths are aware of the services provided by the SFRS, particularly how these can be adapted to meet their own individual needs.
- **Outcome 3:** People from all Scotland's community groups feel safer in their homes and on our roads.
- **Outcome 4:** Establish the SFRS as an employer of choice for people across protected characteristics.
- **Outcome 5:** Provide a positive and healthy workplace culture that welcomes, embraces and develops people from across all protected characteristics.
- **Outcome 6:** People from across all communities are enabled to live lives free from hate crime, harassment and domestic abuse/violence.
- **Outcome 7:** Gypsy travellers and migrant workers are safer, better informed and confident in SFRS engagement.

Although fire statistics provide actual and historical data relating to fires, the profile of a community is of vital importance in helping us to identify the steps needed to achieve these outcomes and ensure everyone has the opportunity to access our services and reduce their risk from fire and other injuries.

SFRS values

Our values framework sets out what we believe to be important in supporting how we deliver our services to the communities and support our own staff. At the core of this, is the safety of the communities we serve and we will do our utmost to enhance and support community safety and place a high value on the safety of our firefighters.

The communities of West Lothian can rightly expect to receive a first class service from the SFRS grounded in our commitment to actively pursue our values in support of better outcomes.



West Lothian Risk Profile

Understanding West Lothian and the profile of the community is of vital importance in helping the SFRS to develop this Local Fire and Rescue Plan and identify priorities and objectives to ensure everyone has the opportunity to access our service and reduce their risk from fire.

This Local Fire and Rescue Plan has been prepared within the wider context of the West Lothian Community Planning Partnership and sets out the local priorities for delivering local fire service priorities for West Lothian. Underlying this plan are the key principles of community planning namely; prevention and early intervention; integration of public services around the whole systems approach; transparency, accountability and innovation in our approaches to fire service provision.

West Lothian covers a geographical area of approximately 425 square kilometres and is situated between the two main cities in Scotland, Edinburgh and Glasgow. It has a growing population that, according to the preliminary results of the 2011 Census, is now 175,000. The rate of increase in population in West Lothian from 1991 to 2011 is around 22% the highest of all Scottish local authority areas. The population for West Lothian is projected to increase to 196,000 by 2024 that is anticipated to be the fastest growing area in Scotland.

West Lothian enjoys a diverse community that is growing. In 2001, there were 4,900 people from minority ethnic communities living in West Lothian, this represented 3.1% of West Lothian's population. Since the 2001 census there has been an increase in the minority ethnic population through an increase in net in-migration. People from ethnic backgrounds can be more vulnerable due to feeling isolated within communities because of a number of reasons, including language barriers and cultural differences.

West Lothian's population is relatively young in comparison to other local authorities in the rest of Scotland, and a high proportion of under 16s. West Lothian's projected population change is also different to most other comparator local authorities, and the Scottish average, in that most of this projected change is estimated to be through natural change e.g. the birth rate being higher than the mortality rate. The educational activities outlined in this Local Fire and Rescue Plan are designed to target young people in the area as part of a preventative strategy.

It is anticipated that West Lothian will see an increase in the proportion of older people living in the area, in common with the rest of the Scotland, as people live longer. Risk to people is increased when age is combined with other factors, such as living alone, living in poverty and in isolation. Physical and mental health issues associated with aging can also contribute to an increase in risk.

Community Planning Partners put significant emphasis on reducing health inequalities across West Lothian and recognise that inequalities can lead to earlier death and poorer health. There is a correlation between health inequalities such as smoking and alcohol/drugs misuse and the increased vulnerability to the risks of fire. This Local Fire and Rescue Plan recognises these links and sets out activities that are aimed at reducing these risks.

West Lothian is important to the Scottish economy and provides a base for a wide variety of businesses and organisations that have located or developed in the area. In 2009, there were 4,120 VAT and PAYE registered businesses in the area. The predominant business sectors in the area are; food and drink, life sciences, financial services, tourism, energy and electronics.

The number of households in West Lothian is predicted to grow significantly. In 2010, there were around 72,500 households in West Lothian and around 74,500 houses. By 2033 there are expected to be 97,100 households in West Lothian, an increase of around 34%. This Local Fire and Rescue Plan takes into consideration the need to ensure the SFRS can respond to the predicted growth of households in the area.

The 2012 Scottish Index of Multiple Deprivation (SIMD) shows that West Lothian has 13 data zones out of 211 (6.2%) in the 15% most deprived data zones in Scotland. Historical SIMD data indicates that there will be an increase in fire related activity in areas of deprivation. This Local Fire and Rescue Plan allows the SFRS sufficient flexibility to target our resources in areas of the most need.

Local Operational Assessment

Identified local key priority areas for West Lothian are monitored through the gathering and analysis of operational activity data.

The Local Fire and Rescue Service activity table below provides a historical indication of the incident types, and the number of incidents, that SFRS attended in West Lothian. The Red/Amber/Green (RAG) Trend column provides an indication whether the number of incidents, per incident type, in the year 2012/13 was higher or lower than in the previous year (2011/12).

Local Fire and Rescue Activity data source SFRS, Incident Recording System (IRS)

Incident Type	2010/11	2011/12	2012/13	3 year average	Trend
All deliberate primary fires	215	186	96	165.7	↓
All deliberate other building fires	51	47	28	42	↓
All deliberate secondary fires	823	683	402	636	↓
All accidental dwelling fires	176	150	179	168.3	↑
All accidental other building fires	47	56	47	50	↓
All fatal fire casualties	1	4	2	2.3	↓
Non-fatal casualties excl. precautionary checks	49	60	57	55.3	↓
Non-fatal casualties incl. precautionary checks	53	76	60	63	↓
Special Service (Road Traffic Collision RTC)	71	70	82	74.3	↑
Special Service flooding	8	6	5	6.3	↓
Special Service extrication	33	21	29	27.6	↑
Special Service 'others'	106	90	84	93.3	↓
False Alarm (Unwanted Fire Alarm Signals UFAS)	1401	1417	1570	1463	↑
False Alarm: Good intent	495	505	362	454	↓
False Alarm: Malicious	76	71	50	65.6	↓

Local Assessment

The local assessment addresses issues relevant to West Lothian. Through analysis of local operational assessment, Community Planning Partners priorities and the needs of the community, local improvement and demand reduction plans can be developed to ensure positive outcomes and results are achieved.

The local assessment has been developed taking cognisance of the outcomes of the public consultation on the draft West Lothian Local Fire and Rescue Plan, local data analysis, SFRS Strategic Aims, National Outcomes, outcomes identified in the West Lothian Single Outcome Agreement 2013-2023, West Lothian Community Planning Partnership: Community Plan 'Towards 2020', West Lothian Community Planning Partnership: Strategic Assessment 2013 and West Lothian Community Safety Partnership: Strategic Assessment 2012-15.

The key priority areas in West Lothian that are considered in the Local Assessment and those that action plans will be developed for are:

- Priority 1 Local Risk Management and Preparedness
- Priority 2 Reduction of Accidental Dwelling Fires
- Priority 3 Reduction in Fire Fatalities and Casualties
- Priority 4 Reduction of Deliberate Fire Setting
- Priority 5 Reduction of Fires in Non-Domestic Property
- Priority 6 Reduction in Casualties from Non-Fire Emergencies
- Priority 7 Reduction of Unwanted Fire Alarm Signals.

The table below depicts the links between the Local Fire and Rescue Plan for West Lothian key priorities and the West Lothian Community Planning Partners SOA outcomes.

	Local Fire and Rescue Plan for West Lothian Priorities						
West Lothian SOA Outcomes	Priority 1	Priority 2	Priority 3	Priority 4	Priority 5	Priority 6	Priority 7
1) Our children have the best start in life and are ready to succeed		√	√				
2) We are better educated and have access to increased and better quality learning and employment opportunities		√	√	√		√	
3) Our economy is diverse and dynamic, and West Lothian is an attractive place for doing Business	√	√		√	√		√
4) We live in resilient, cohesive and safe Communities	√	√	√	√	√	√	√
5) People most at risk are protected and supported to achieve improved life chances.		√	√				
6) Older people are able to live independently in the community with an improved quality of life		√	√				
7) We live longer, healthier lives and have reduced health inequalities.	√	√	√				
8) We make the most efficient and effective use of resources by minimising our impact on the built and natural environment.	√	√		√	√		√

Priorities, Actions and Outcomes

1. Local Risk Management and Preparedness

The SFRS has a statutory duty to reduce the risks to our communities to make certain that they receive the best possible service. The management of risk within our community means:

- Identifying the risks to the community that fall within the scope of responsibility of the SFRS.
- Undertaking a process to prioritise these risks.
- Ensuring that appropriate Local and National resource capability and trained Fire Service personnel are in place to address them.

The SFRS monitors existing risks and emerging threats in terms of the natural and built environment, as per the Lothian and Borders Community Risk Register, to identify areas that require risk management and preparation initiatives. Examples of such risks identified in West Lothian are:

- Forest or moorland fire
- Local accident on motorways and major trunk roads
- Localised flash flooding up to 200 properties
- Fire or explosion at a gas terminal or involving a gas pipeline.

The SFRS is committed to working in partnership with all relevant stakeholders to ensure emergency planning and preparedness arrangements are in place and tested. An element of our partnership working includes empowering and supporting communities to build community resilience and cohesion. Through this work, we will work with communities to harness their resources and expertise. Examples of this work includes; making communities aware of the risks that they face, simple steps to improve their own safety.

Aligns to:

National Outcomes:

- 6: We live longer healthier lives.
- 8: We have improved the life chances for children, young people and families at risk.
- 9: We live our lives safe from crime disorder and danger.
- 11: We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- 12: We value and enjoy our built and natural environment and protect it and enhance it for future generations.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 2: More equitable access to fire and rescue services.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' No's 3,4,7 and 8
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15
- East Service Delivery Area Regional Resilience Partnership \ [Lothian and Borders Local Resilience Partnership Community Risk Register](#)
- [The Civil Contingencies Act 2004 \(Scotland\) Regulations 2005](#).

We will achieve it by:

- Ensuring our training, staff development and equipment is fit for purpose to meet our current risk profile and adaptable to changing circumstances.
- Ensure all known risk information is obtained, communicated and tested.
- Working locally with partner organisations and agencies to ensure effective response plans are developed for identified risks.
- Fulfilling our statutory duties in relation to the Civil Contingencies Act.

In doing so we will add value by:

- Keeping our staff and members of the public safe, should any incident occur.
- Reducing the financial burden and disruption caused to our communities when emergencies occur.
- The wealth and prosperity of our area will increase
- Proactively helping the wider community by preventing emergencies and planning to mitigate their effects when they occur.

2. Reduction of Accidental Dwelling Fires

Throughout West Lothian, accidental dwelling fires have occurred within a wide variety of locations. There are direct links to areas of social deprivation and those who are most vulnerable to fire within the community.

Alcohol consumption and/or drugs misuse continue to be identified as a contributory factor in a number of serious injury/fatal fires, due to the affect that they have upon the occupant's ability to react appropriately in a fire situation. In addition, cigarettes and smoking materials continue to be identified as the primary ignition source in a number of serious injury/fatal fires.

House fires can have a significant negative impact on both individuals and the community, in relation to the human, social and economic cost of fire.

Through our Home Fire Safety Visit programme, Community Engagement and Education activities, we aim to reduce the risk and impact of fire and the associated losses.

Aligns to:

National Outcomes:

- 6: We live longer healthier lives.
- 8: We have improved the life chances for children, young people and families at risk.
- 9: We live our lives safe from crime disorder and danger.
- 11: We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- 12: We value and enjoy our built and natural environment and protect it and enhance it for future generations.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 2: More equitable access to fire and rescue services.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' No's 1,2,3,4,5,6,7 and 8 (SOA1304 -14 indicator)
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15

We will achieve it by:

- Active participation in West Lothian Community Planning arrangements and adopting a partnership approach to risk reduction.
- Sharing information with Health Care, Social Work and relevant partners to help protect the most vulnerable.
- Developing new partnerships to identify and support at risk groups.
- Identifying opportunities for engagement with all members of our community to promote fire safety and good citizenship.
- Delivery of fire safety related educational programmes and community engagement activities.

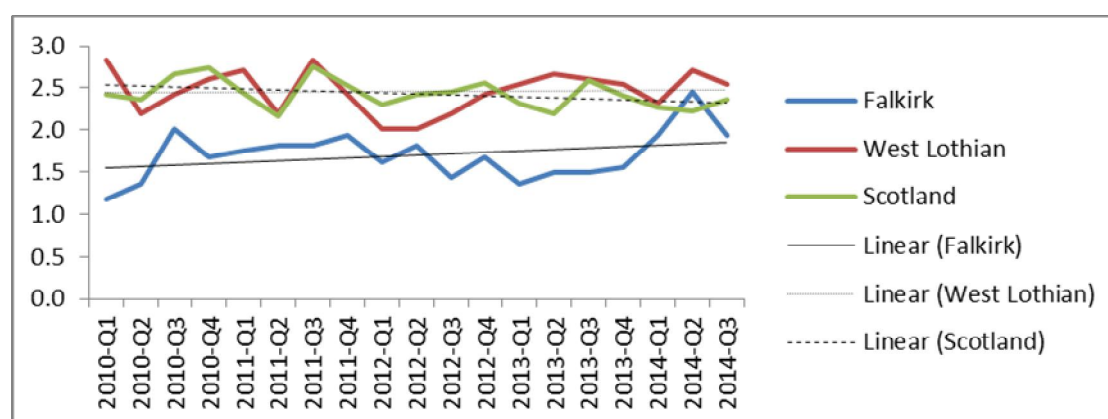
In doing so we will also add value by:

- Promoting confident and safe communities where residents feel positive about where they live.
- Our citizens will be protected.
- Our communities will be safer.
- Reducing the potential financial burden on society through the education of residents.

We aim to reduce Accidental Dwelling Fires in West Lothian by 2% per year, which contributes towards the SFRS target of reducing Accidental Dwelling Fires by 10% per year, over a three-year rolling period.

Performance

The graph below provides empirical incident data on performance in relation to Accidental Dwelling Fires. (data source SFRS, IRS)



The graph depicts the occurrence of Accidental Dwelling Fires per 10,000 population*. For benchmarking purposes, comparative trend data from a comparable local authority area (Falkirk) and Scotland has been included.

*Source: - General Register Office for Scotland (GROS)

3. Reduction in Fire Fatalities and Casualties

Fire casualties tend to occur in accidental dwelling fires. Evidence suggests that where occupants of a dwelling misuse alcohol and/or drugs or are elderly or infirm, there is an increased likelihood of becoming a fire casualty/fatality. The absence of a working smoke detector can greatly increase the vulnerability of these individuals.

The human and financial costs associated with fire casualties/fatalities are high due to potentially significant trauma/loss of life to individuals, and societal costs.

The SFRS in West Lothian aims to target a reduction in these casualties by adopting a partnership approach to reduce the risk to individuals, particularly those that are most vulnerable.

Aligns to:

National Outcomes:

- 6: We live longer, healthier lives.
- 8: We have improved the life chances for children, young people and families at risk.
- 9: We live our lives safe from crime, disorder and danger.
- 11: We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- 15: Our people are able to maintain their independence as they get older and are able to access appropriate support when they need it.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 2: More equitable access to fire and rescue services.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' We live in resilient, cohesive and safe
- Communities No's 1,2,4,5,6 and 7 (SOA1304_13 & SOA1304_14 indicators)
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15

We will achieve it by:

- Active participation in West Lothian Council Community Planning arrangements and adopting a partnership approach to risk reduction.
- Continued delivery of the Home Fire Safety Visit programme to households within West Lothian, with particular emphasis on the most vulnerable in our community.
- Targeted Home Fire Safety Visit referrals from partner agencies.
- Promoting healthier lifestyles through encouraging a reduction in alcohol, drugs and cigarette use.
- Ensuring our community safety strategy considers all persons at risk from fire.

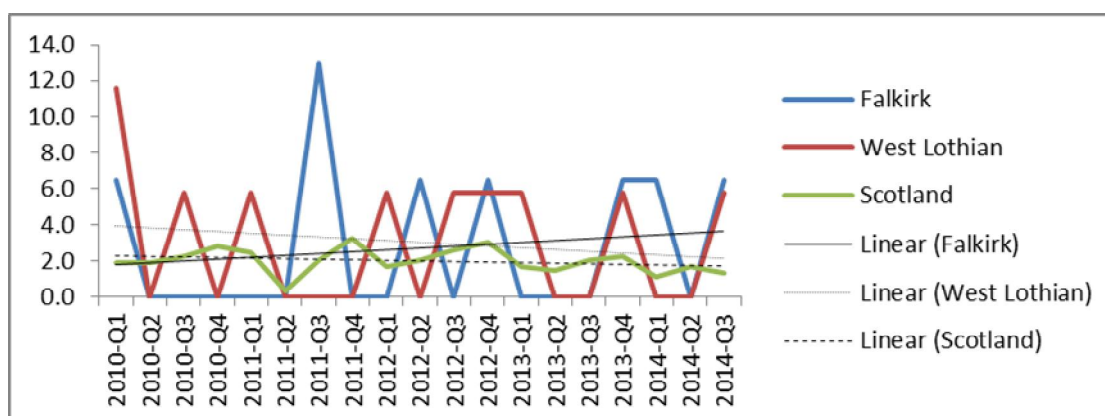
In doing so we will also add value by:

- Our citizens will be protected.
- Our communities will be safer.
- Reducing demand on other partner services such as local health care and social work partners.
- Reducing fire casualty hospitalisation times.

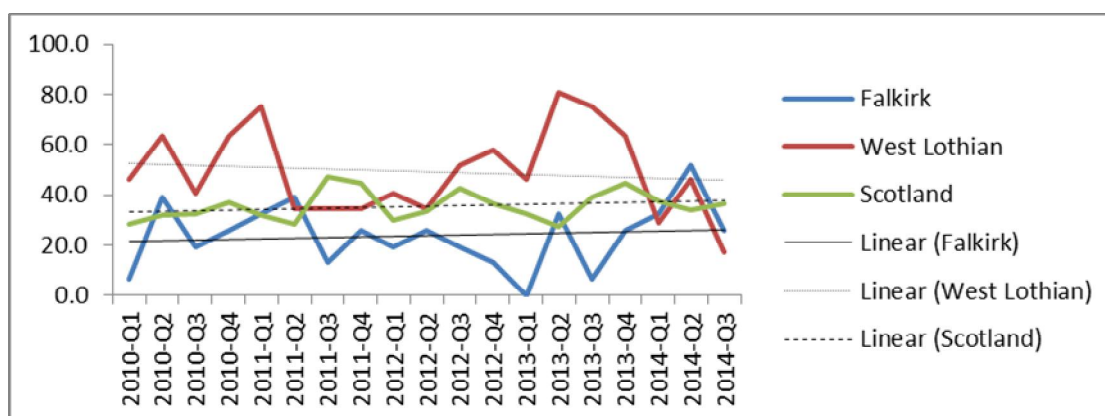
We aim to reduce Fire Casualties in West Lothian by 5% per year, which contributes towards the SFRS target of reducing Fire Casualties by 5% per year, over a three-year rolling period.

Performance

The graph below provides empirical incident data on performance in relation to Fire Fatalities (data source SFRS, IRS)



The graph below provides empirical incident data on performance in relation to Non-Fatal Fire Casualties (excl. precautionary check-ups) (data source SFRS, IRS)



The graphs above depict the number of Fatal and Non-Fatal Fire Casualties per 1,000,000 population*. For benchmarking purposes, comparative trend data from a comparable local authority area (Falkirk) and Scotland has been included.

*Source: GROS

4. Reduction in Deliberate Fire Setting

Deliberate fire setting is a significant problem for the SFRS and is responsible for a significant number of secondary fires that are attended across West Lothian. In the main, secondary fire categories are refuse, grassland and derelict buildings incidents. In addition deliberate fire setting is responsible for a number of primary fires that involve property loss and potential injury/loss of life.

There is a close link between deliberate secondary fires and other forms of anti-social behaviour. By continuing to focus our attention on deliberate fires this will reduce the demand on the SFRS and the burden upon partners and in turn enhance community wellbeing and the environmental impact.

Aligns to:

National Outcomes:

- 4: Our young people are successful learners, confident individuals, effective contributors and responsible citizens.
- 8: We have improved the life chances for children, young people and families at risk.
- 9: We live our lives safe from crime, disorder and danger.
- 11: We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- 12: We value and enjoy our built and natural environment and protect it and enhance it for future generations.
- 14: We reduce the local and global environmental impact of our consumption and production.
- 16: Our public services are high quality, continually improving, efficient and responsive to local people's needs.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 2: More equitable access to fire and rescue services.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' We live in resilient, cohesive and safe
- Communities No's 2,3,4 and 8 (SOA1304_13 indicator)
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15

We will achieve it by:

- Engaging in a multi-agency approach to tackle deliberate fire setting and fire related anti-social behaviour by the targeting resources to areas of demand.
- Deliver youth engagement programmes to reduce anti-social behaviour through diversionary activities and education.
- Identify and develop partnerships with organisations who engage with young people.

- Providing an enhanced level of Fire Investigation within West Lothian.

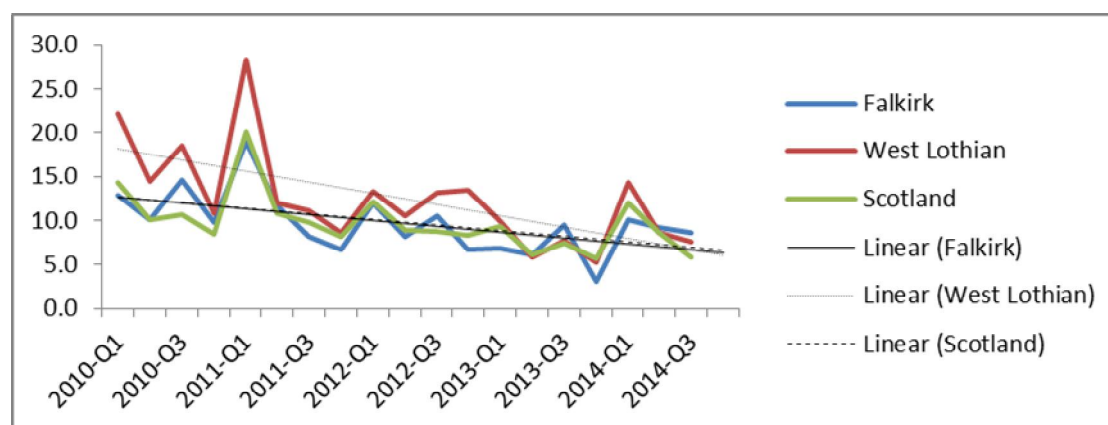
In doing so we will also add value by:

- Promoting safe and attractive communities in which people want to live.
- Diverting those persons away from anti-social behaviour by encouraging them to be good citizens.
- Reducing the adverse effects that deliberate fire setting has on peoples' lives within West Lothian.
- Supporting the national focus towards early and effective intervention.

We aim to reduce Deliberate Fire Setting in West Lothian by 5% per year.

Performance

The graph below provides empirical incident data on performance in relation to All Deliberate Fires (data source SFRS, IRS)



The graph depicts the occurrence of All Deliberate Fires per 10,000 population*. For benchmarking purposes, comparative trend data from a comparable local authority area (Falkirk) and Scotland has been included.

*Source: GROS

5. Reduction of Fires in Non-Domestic Properties

All fires in workplaces and business premises are classed as Non-Domestic Fires and come under the scope of the Fire (Scotland) Act 2005.

Fire Safety Enforcement Officers carry out audits to ensure statutory responsibilities are met and provide advice to businesses on fire safety. The types of premises encompassed by the Act can be wide-ranging and include industrial, commercial and those premises providing sleeping accommodation such as residential care premises.

In addition to the costs associated with fires in commercial properties, many businesses that experience a significant fire do not reopen afterwards.

We proactively work as part of a partnership, with local industry to ensure that Businesses Continuity Planning and Emergency Preparedness Arrangements are appropriate, to ensure we can mitigate the impact of fires and other emergencies on business and that we are prepared to respond to adverse safety events.

Aligns to:

National Outcomes:

- 1: We live in a Scotland that is the most attractive place for doing business in Europe.
- 6: We live longer, healthier lives.
- 9: We live our lives safe from crime, disorder and danger.
- 12: We value and enjoy our built and natural environment and protect it and enhance it for future generations.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 2: More equitable access to fire and rescue services.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' We live in resilient, cohesive and safe
- Communities No's 3,4 and 8 (SOA1304_13 indicator)
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15

We will achieve it by:

- The audit of business and commercial premises by Fire Safety Enforcement Officers using a risk based approach.
- Work with the West Lothian Council licensing department to ensure all multiple occupation houses comply with the required standards in relation to Fire Safety.
- Carrying out Post Fire Audits following any fire within relevant premises.

- Consultation with West Lothian Council Building Standards Officers and architects.
- Participation in major incident preparedness and exercising.

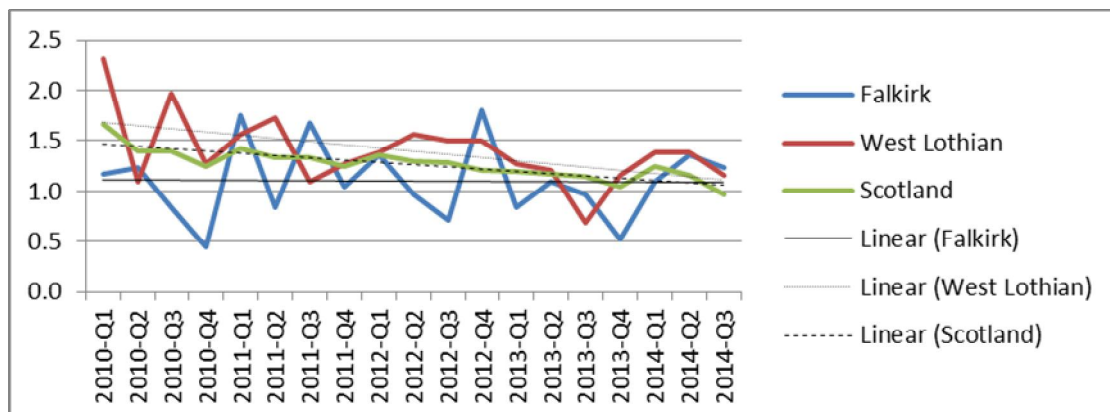
In doing so we will also add value by:

- The wealth and prosperity in our area will increase.
- The quality of our infrastructure will help promote growth of the local economy.
- Safeguarding the wellbeing of residents and employees within relevant premises.
- Supporting business continuity and employment within West Lothian.
- Our citizens will be protected.
- Our communities will be safer.

We aim to reduce Non-Domestic Premises Fires in West Lothian by 3% per year, which contributes to the SFRS target of continually reducing Non-Domestic Premises Fires.

Performance

The graph below provides empirical incident data on performance in relation to fires in Non-Domestic Premises (data source SFRS, IRS)



The graph depicts the occurrence of all fires in Non-Domestic Other Buildings per 10,000 population* For benchmarking purposes comparative trend data from a comparable local authority area (Falkirk) and Scotland has been included.

*Source: GROS

6. Reduction in Fatalities and Casualties from Non-Fire Emergencies

A central part of the SFRS's role is responding to non-fire emergencies such as Road Traffic Collisions (RTCs) and other rescue situations such as; rescue from water, from height or from entrapment. Operational fire fighters are trained to a high standard and have at their disposal the most modern equipment for extricating people in rescue situations and administering first aid to casualties.

Attendance at RTCs is a core role for the SFRS but primary responsibility for road safety lies with Transport Scotland, Police Scotland and local authorities. The SFRS has a crucial role in support of these organisations activities at a local level and can provide access to hard-hitting education programmes aimed at the most at risk groups to highlight the consequences of RTCs and dangerous driving. National statistics identify that the most at risk group is young drivers who are targeted through the multi-agency initiative "Westdrive", which is aimed at 4th year school pupils and supports [Go Safe, Scotland's Road Safety Framework for 2020](#).

The educational road safety activities that we deliver are designed to increase driver awareness in relation to the consequences of dangerous driving. Particular focus continues to be on young and new drivers.

Aligns to:

National Outcomes;

- 4: Our young people are successful learners, confident individuals, effective contributors and responsible citizens.
- 6: We have improved the life chances for children, young people and families at risk.
- 9: We live our lives safe from crime, disorder and danger.
- 15: Our public services are high quality, continually improving, efficient and responsive to other people's needs.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 2: More equitable access to fire and rescue services.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' We live in resilient, cohesive and safe
- Communities No's 2 and 4 (SOA1307_04)
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15
- West Lothian Community Safety Partnership: Road Casualty Reduction Plan 2012 – 15.

We will achieve it by:

- Continuing our educational programmes, such as Westdrive, particularly aimed at high risk groups within our communities.
- Develop innovative ways of delivering the road safety agenda in collaboration with partners.
- Working with our partners within West Lothian to ensure that all agencies can map road incident hotspots.

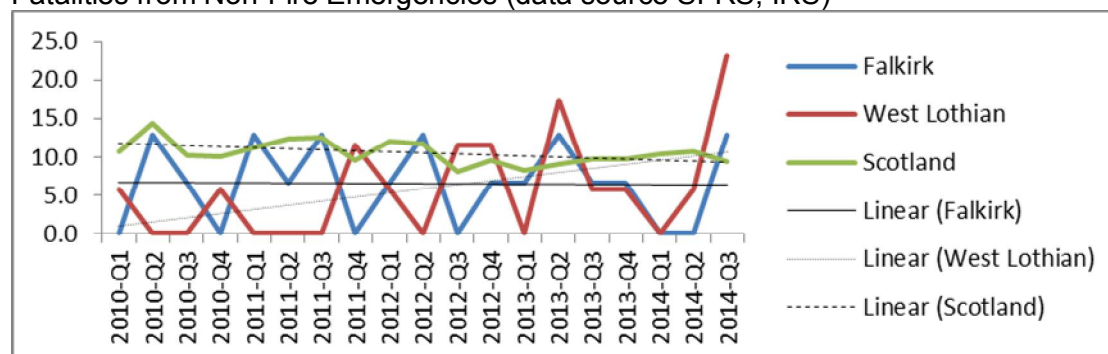
In doing so we will also add value by:

- Our citizens will be protected.
- Our communities will be safer.
- Reducing the number of hospital admissions, and the associated costs to the NHS and other organisations due to RTC related injuries.
- Encouraging young drivers and other groups to be responsible road users through active engagement and education.

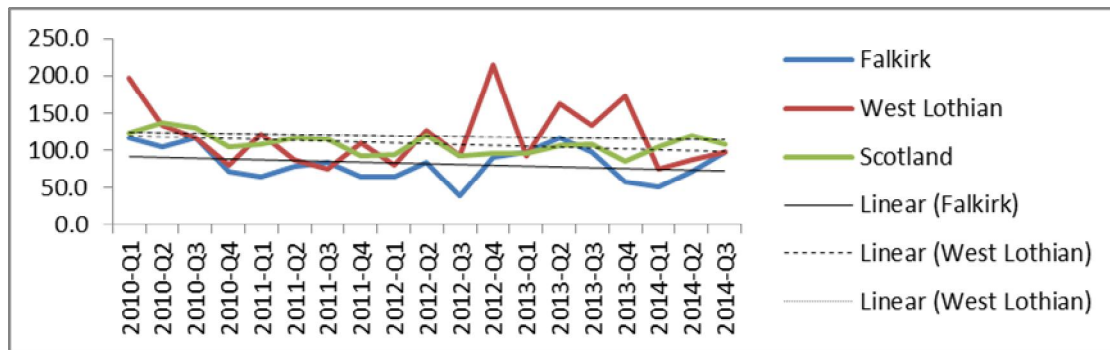
We aim to reduce Casualties from Non-Fire Emergencies in West Lothian by 4% per year, which contributes to the SFRS target of reducing Casualties from Non-Fire Emergencies per year, over a three-year rolling period.

Performance

The graph below provides empirical incident data on performance in relation to Fatalities from Non-Fire Emergencies (data source SFRS, IRS)



The graph below provides empirical incident data on performance in relation to Non-Fatal casualties from Non-Fire Emergencies (excl. precautionary check-ups) (data source SFRS, IRS)



The graphs above depict the number of Fatal and Non-Fatal Non-Fire Emergency Casualties per 1,000,000 population*. For benchmarking purposes, comparative trend data from a comparable local authority area (Falkirk) and Scotland has been included.

*Source: GROS

7. Reduction of Unwanted Fire Alarm Signals

Unwanted Fire Alarm Signals (UFAS) are those occasions when an automated fire alarm system activates and results in the mobilisation of SFRS resources, when the reason for that alarm turns out to be something other than a fire emergency.

UFAS are categorised into three main categories: False Alarm Good Intent, False Alarm Malicious or False Alarm Equipment Failure.

Within West Lothian UFAS incidents in non-domestic properties account for a significant amount of the total calls attended.

UFAS has a negative impact on the SFRS through the deployment of resources to incidents where their life saving services are not required. This negative impact is also experienced by businesses through loss of production, business continuity or service delivery.

Attendance at UFAS creates a negative financial burden upon SFRS as well as increasing the road risk and environmental impact within West Lothian.

Aligns to:

National Outcomes;

- 1: We live in a Scotland that is the most attractive place for doing business in Europe.
- 6: We live longer, healthier lives.
- 8: We have improved the life chances for children, young people and families at risk.
- 9: We live our lives safe from crime, disorder and danger.
- 12: We value and enjoy our built and natural environment and protect it and enhance it for future generations.
- 14: We reduce the local and global environmental impact of our consumption and production.

Scottish Fire and Rescue Service Strategic Aims:

- 1: Improve safety of our communities and staff.
- 3: Improved outcomes through partnership.
- 4: Develop a culture of continuous improvement.

West Lothian Priority:

- West Lothian Community Planning Partnership: Community Plan 'Towards 2020'
- West Lothian Community Planning Partnership: Single Outcome Agreement 2013-23 'achieving positive outcomes' No's 3, 4 and 8.
- West Lothian Community Planning Partnership: Strategic Assessment 2013
- West Lothian Community Safety Partnership: Strategic Assessment 2012-15

We will achieve it by:

- Working with the business and commercial sector to provide advice and guidance in relation to the management of unwanted fire alarm signals.
- Ensure premises with unwanted fire alarm signal occurrences comply with the British Standard 5839 Part 1 & 6: current editions.
- Implementation of SFRS UFAS policy.

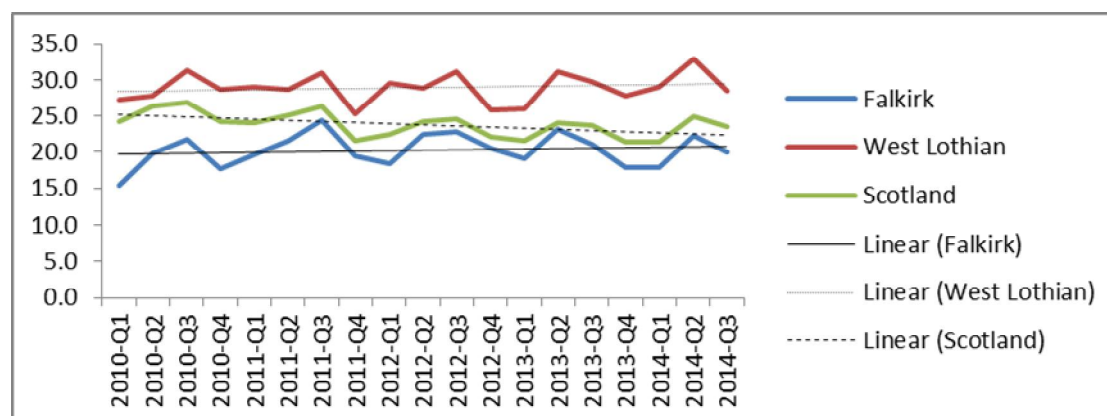
In doing so we will also add value by:

- The wealth and prosperity in our area will increase.
- The negative impact of UFAS on local business will reduce.

We aim to reduce Unwanted Fire Alarm Signals in West Lothian by 5% per year.

Performance

The graph below provides empirical incident data on performance in relation to All False Alarms (data source SFRS, IRS)

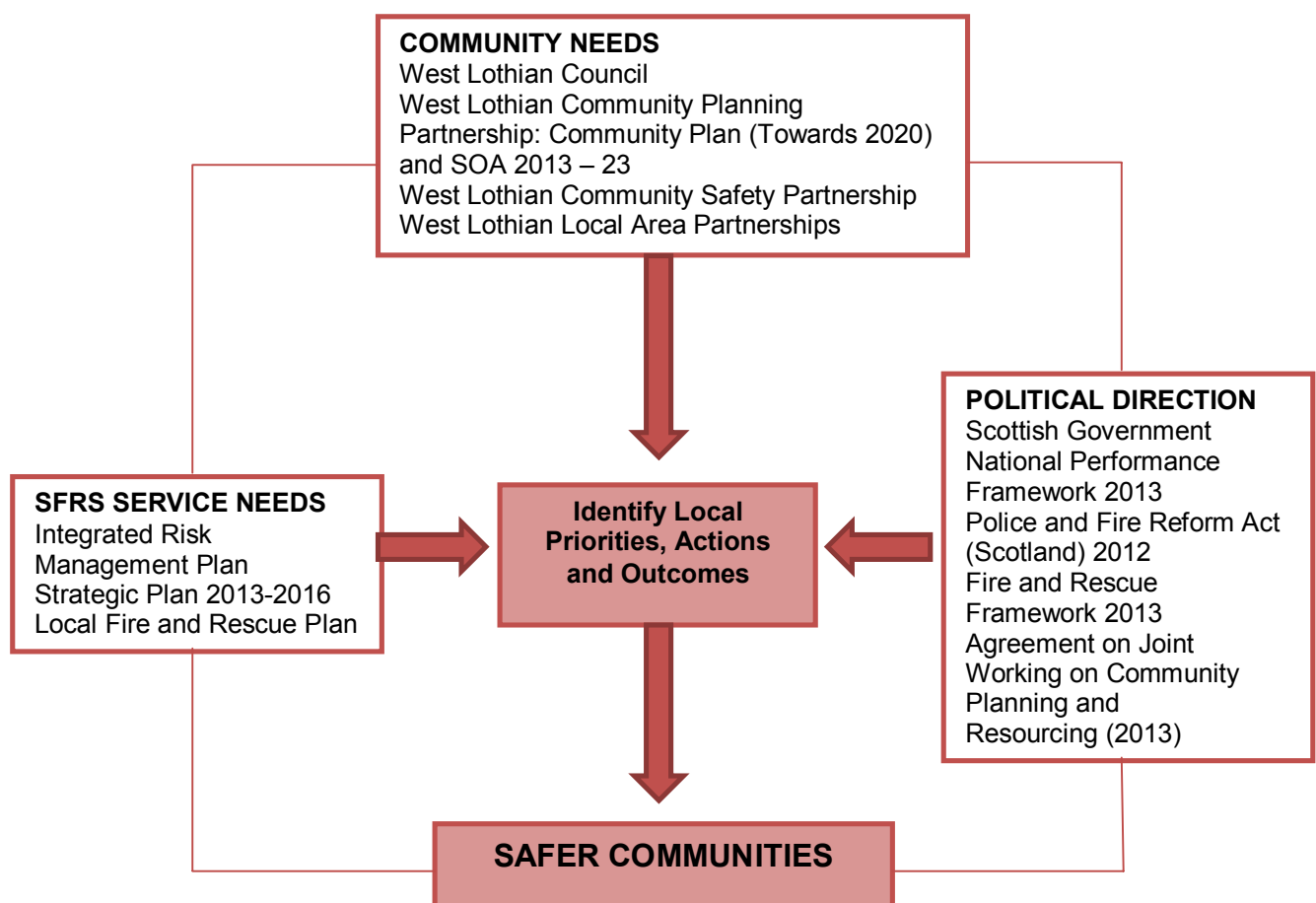


The graph depicts the occurrence of All False Alarms per 10,000 population*. For benchmarking purposes, comparative trend data from a comparable local authority area (Falkirk) and Scotland has been included.

*Source: GROS

Achieving Local Outcomes

Following a process of identifying local risks within West Lothian, priority actions to address them and expected outcomes have been set within this Local Fire and Rescue Plan. Local risks were identified following considerations of political direction set by the Scottish Government, community needs identified through consultation and the operational resources and capacity of the SFRS.



OUTCOMES

The Police and Fire Reform (Scotland) Act 2012 includes a framework for local scrutiny and engagement arrangements between local authorities and the Scottish Fire and Rescue Service.

Across West Lothian, local scrutiny of the performance of the Fire and Rescue Service takes place at the West Lothian Council Services for Communities

Review

To ensure this Local Fire and Rescue Plan remains flexible to emerging local or national priorities a review may be carried out at any time but will be reviewed at least once in its lifetime. A review may also be carried out if the Scottish Minister directs it or if a new Strategic Plan is approved.

Contact Us

If you have something you would like to share with us, you can get in touch in a number of ways:

- Use the feedback form on our website to send an email - www.firescotland.gov.uk
- Contact your local Community Fire Station - details are listed on our website or in your local telephone directory.
- Contact Falkirk & West Lothian LSO Area Headquarters on 01324 629121.
- Write to us at the address at the bottom of this page.

We are fully committed to continually improving the service we provide to our communities and recognise that to achieve this goal we must listen and respond to the views of the public.

We use all feedback we receive to monitor our performance and incorporate this information into our planning and governance processes in order to continually improve our service.

We are proud to say that the majority of the feedback we receive is positive, and we are keen to hear examples of good practice and quality service delivery that exemplifies the standards of care that we strive to provide for the communities of Scotland.

In instances where our standards of service are questioned, we welcome the opportunity to investigate the circumstances, and are committed to correcting any lapses and using the learning outcomes to improve our future service delivery.

If you would like a copy of this document in a different format or a version in another language, please contact:

Scottish Fire and Rescue Service, Service Delivery Area East HQ, Main Street, Maddiston FK2 0LG

Tel 01324 710220 Fax 01324 715353 or alternatively visit our website
www.firescotland.gov.uk

Glossary of Terms

Accidental: Caused by accident or carelessness. Includes fires that accidentally get out of control.

Casualty: consists of persons requiring medical treatment beyond first aid given at the scene of the incident, those sent to hospital or advised to see a doctor for a check-up or observation (whether or not they actually do). People sent to hospital or advised to see a doctor as a precaution, having no obvious injury, are recorded as 'precautionary check-ups'. Casualty figures do not include fatalities.

Deliberate: covers fires where deliberate ignition is suspected

Unwanted Fire Alarm Signals: an event in which the Fire and Rescue Service believes they are called to a reportable fire and then find there is no such incident. These can be Malicious, of Good Intent or caused by Equipment.

Fatality: a casualty whose death is attributed to a fire is counted as a fatality even if the death occurred later. Fatalities associated with Other Incidents can include attendance to assist Police or Ambulance colleagues when a person has been found who has committed suicide, for example. Often there is little we can do as a Service to influence this particular figure.

Primary Fires: includes all fires in buildings, vehicles and most outdoor structures or any fire involving casualties, rescues or fire attended by five or more pumping appliances.

Secondary Fires: These cover the majority of outdoor fires including grassland and refuse fires unless they involve casualties or rescues, property loss or if five or more appliances attend. They include fires in derelict buildings but not chimney fires.

Incident Recording System: Department of Communities and Local Government Fire and Rescue Service Directorate, web-enabled Incident Recording System for collection and subsequent statistical handling and publication of incident data from United Kingdom Fire and Rescue Services.

Abbreviations

AFA - Automatic Fire Alarm

UFAS - Unwanted Fire Alarm Signals

RTC - Road Traffic Collision

LGBT - Lesbian Gay Bisexual Transgender

BME - Black Minority Ethnic

COMAH - Control of Major Accident and Hazards

IRS - Incident Recording System

References

The Scottish Fire and Rescue Service Strategic Plan for 2013-2016.

<http://www.firescotland.gov.uk/about-us/strategic-plan.aspx>

Police and Fire Reform (Scotland) Act 2012.

<http://www.legislation.gov.uk/asp/2012/8/contents/enacted>

Fire (Scotland) Act 2005.

<http://www.legislation.gov.uk/asp/2005/5/contents>

The Scottish Government National Performance Framework.

<http://www.scotland.gov.uk/About/Performance/scotPerforms>

The Scottish Government National Outcomes.

<http://www.scotland.gov.uk/About/Performance/scotPerforms/outcome>

The Scottish Fire and Rescue Service Equality Outcomes.

http://www.firescotland.gov.uk/media/340295/equality_outcomes.pdf

The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012.

<http://www.legislation.gov.uk/sdsi/2012/9780111016718/contents>

Fire and Rescue Framework for Scotland 2013.

<http://www.scotland.gov.uk/Resource/0041/00416181.pdf>

West Lothian's Community Plan and Single Outcome Agreement 2013-2023.

<http://www.westlothian.gov.uk/media/downloadoc/1799465/lcp/SOA2013>

West Lothian Community Planning Partnership: Community Plan 'Towards 2020'.

http://www.westlothian.gov.uk/media/downloadoc/1799465/lcp/CommunityPlan_2010-2020

West Lothian Community Planning Partnership, Strategic Assessment.

http://www.westlothian.gov.uk/media/downloadoc/1799465/lcp/CPStrategic_Assessment

West Lothian Community Safety Partnership, Strategic Assessment

<http://www.westlothian.gov.uk/Community-life-and-leisure/396/>

Lothian and Borders Local Resilience Partnership Community Risk Register

http://alcoholisnotanexcuse.co.uk/files/Information/Strategic%20Plans/Community-Risk-Register_2012.pdf

The Civil Contingencies Act 2004 (Scotland) Regulations 2005

<http://www.scotland.gov.uk/Publications/2005/02/20630/51567>

Scotland's Road Safety Framework to 2020

<http://www.roadsafetyobservatory.com/Pdf/SCOTLAND%20RS%20FRAMEWORK%202020.pdf>



SCOTTISH
FIRE AND RESCUE SERVICE

Working together for a safer Scotland

Report to:

West Lothian Council Services for Communities Policy Development and Scrutiny Panel

***SUBJECT: OUTCOME OF CONSULTATION PROCESS ON THE SCOTTISH FIRE
AND RESCUE SERVICE LOCAL FIRE AND RESCUE PLAN FOR WEST
LOTHIAN 2014 – 2017***

1. INTRODUCTION

- 1.1 This report provides members of the West Lothian Council, Services for Communities, Policy Development and Scrutiny Panel (PDSP) with an overview of the responses and outcomes to the consultation on the Scottish Fire and Rescue Service (SFRS) Local Fire and Rescue Plan for West Lothian 2014 – 2017.

2. BACKGROUND

- 2.1 Under the Police and Fire Reform (Scotland) Act 2012 Section 41E, the SFRS must prepare a Local Fire and Rescue Plan for each local authority area and submit it for approval to the local authority for which the Local Fire and Rescue Plan relates to.
- 2.2 The Local Senior Officer (LSO) is responsible for developing, for the approval of West Lothian Council, the West Lothian Local Fire and Rescue Plan. The plan by mutual agreement, should be integrated in the wider plans of the Community Planning Partnership and the West Lothian Single Outcome Agreement (SOA).

3. LOCAL FIRE AND RESCUE PLAN FOR WEST LoTHIAN 2014-2017

3.1 Following the publication of the SFRS Strategic Plan 2013-2016 and identification of national priorities within this, the LSO for Falkirk and West Lothian has drafted the Local Fire and Rescue Plan for West Lothian 2014-2017.

3.2 There are seven priorities identified within the Local Fire and Rescue Plan for West Lothian 2014 – 2017, these being:

- Local Risk Management and Preparedness
- Reduction of Accidental Dwelling Fires
- Reduction in Fire Fatalities and Casualties
- Reduction of Deliberate Fire Setting
- Reduction of Fires in Non-Domestic Property
- Reduction in Fatalities and Casualties from Non-Fire Emergencies
- Reduction of Unwanted Fire Alarm Signals.

3.3 Also contained within the Police and Fire Reform (Scotland) Act 2012, is the requirement for the LSO to consult with key stakeholders on the content of the Local Fire and Rescue Plan, and to take into consideration views of stakeholders in developing the plan.

4. CONSULTATION PROCESS

4.1 Where practical, best practice in public consultation has been followed during the consultation process.¹

4.2 Consultation with key stakeholders and members of the community in West Lothian commenced in December 2013 and concluded on 14th February 2014.

4.3 The consultation was undertaken through a range of methodologies including;

- Face to face meetings,
- Presentations at stakeholder meetings,
- Invitations to access an electronic survey toolkit, and
- Distribution of hard copy consultation questionnaires.

¹ Scottish Government, Consultation Good Practice Guidance, May 2008

- 4.4 During the consultation process, responses were received via hard copy questionnaire responses, electronic survey toolkit responses, verbal and written communications, stakeholder written responses and direct feedback from stakeholders.
- 4.5 On completion of the consultation period, all responses were collated and evaluated by staff within the West Lothian LSO area. The evaluation that was undertaken took the format of quantitative and qualitative analysis of responses and comments received during the consultation period. Section 5 below outlines the findings of the evaluation of the consultation responses.
- 4.6 Where the analysis of responses or comments concluded that the Local Fire and Rescue Plan could be enhanced through accepting the response/s or comments, the plan was amended. Where the analysis of responses or comments concluded that the plan would not be enhanced, the comment or response was not reflected through an amendment to the plan.
- 4.7 In certain circumstances, responses and comments were screened and deemed not to be considered in the evaluation of the consultation, due to reasons linked to defamation, inappropriate language, or lack of pertinence to the Local Fire and Rescue Plan.
- 4.8 In addition to receiving responses from stakeholders in West Lothian on the West Lothian Fire and Rescue Local Plan, specific and generic responses and comments have been made by stakeholders on the Local Plans developed for all 32 local authority areas. Where relevant and appropriate these responses and comments have been taken into consideration and the West Lothian Fire and Rescue Plan has been amended.

5. CONSULTAION EVALUATION

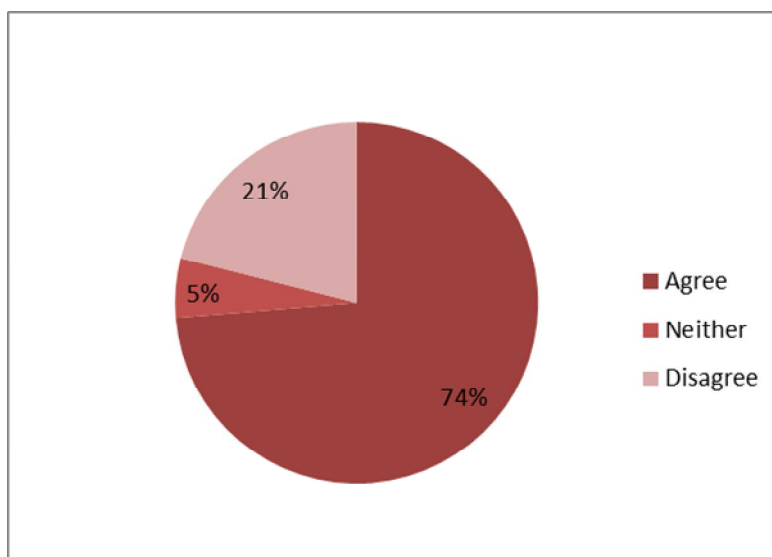
5.1 Responses

A breakdown of the responses received that relate to the West Lothian Fire and Rescue Local Plan is indicated below;

Total Responses	38	
Individuals	30	79%
Organisations	8	21%

5.2 Content and formatting (Quantitative Evaluation)

5.2.1 Q1. The language is clear and understandable

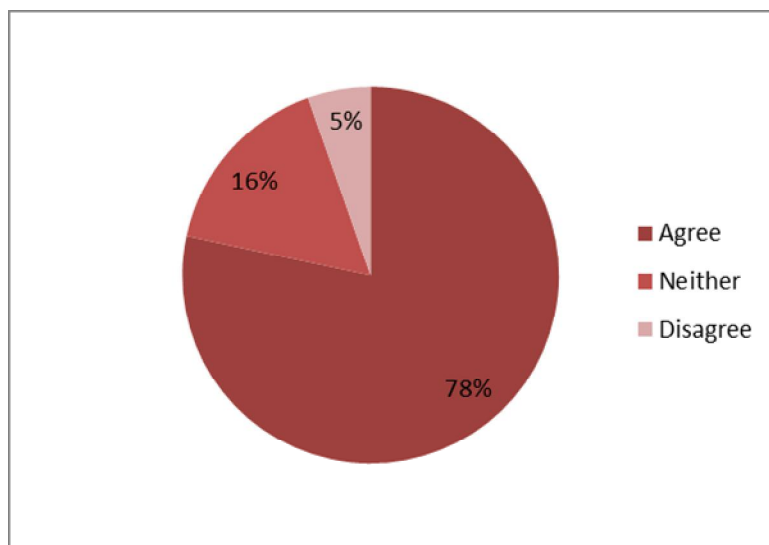


SFRS Comment/Action

Whilst a high proportion of respondents indicated that the language is clear and understandable, there are sufficient negative responses to conclude that the language could be clearer and more understandable.

The plan has been reviewed and where possible language, terminology and abbreviations have been made easier to understand.

5.2.2 Q2. There is a logical progression throughout the plan clearly explaining the plan and context.

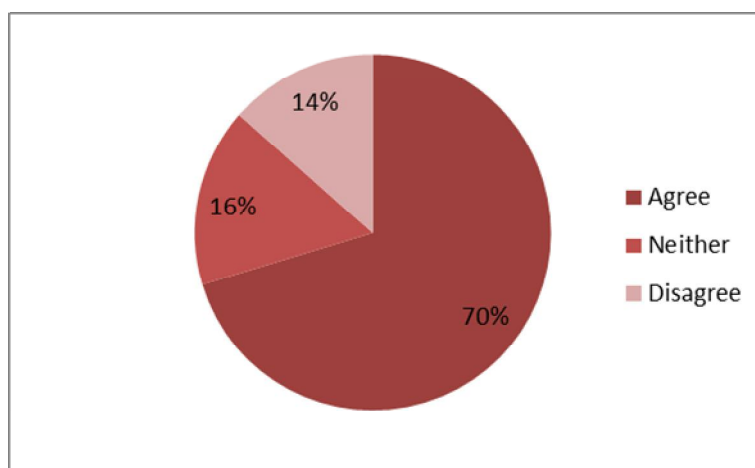


SFRS Comment/Action

Whilst a high proportion of respondents indicated that there is a logical progression throughout the plan there a sufficient negative responses to conclude that the plan could be clearer.

The plan has been revised to include flow charts to assist understanding of the logical progression throughout the plan and explaining the plan in context.

5.2.3 Q3. The glossary of terms explains language and terms used fully.

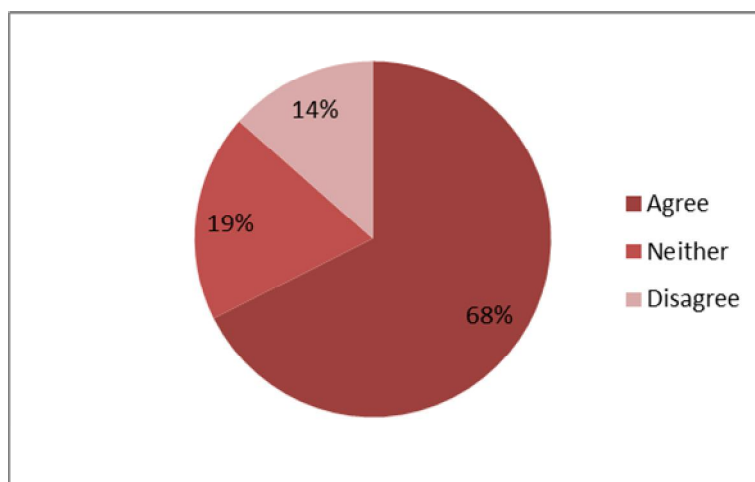


SFRS Comment/Action

The proportion of disagree (or neither agree or disagree) responses leads to the conclusion that better use could have been made of the glossary.

The glossary in the revised plan has been expanded upon.

5.2.4 Q4. Where abbreviations are used, these are explained.



SFRS Comment/Action

The high proportion of disagree (or neither agree or disagree) responses leads to the conclusion that where abbreviations have been used, they have not been fully explained. The plan has been revised to ensure all abbreviations have been explained.

5.3 Content and formatting (Qualitative Evaluation)

Comment/Response

It is considered that the plan would be strengthened by a summary of resources available to ensure the delivery of the plan of the three year period.

SFRS Comment/Action

It is accepted that the plan could be enhanced through the inclusion of a summary of available resources. The revised plan incorporates a section on resources.

Response/Comment

Local Assessment - Outcome 2 - abbreviations LGBT, BME not explained,

SFRS Comment/Action

Responses relating to abbreviations are captured in section 5.2.4

Response/Comment

No page numbers, No page numbers on the document

SFRS Comment/Action

Comments on page numbers accepted. The revised plan incorporates page numbering.

Response/Comment

Too much jargon for the average person in the street,

Very repetitive document not engaging for members of the public,

Paper well laid out,

SFRS Comment/Action

To achieve a degree of consistency a template was designed for SFRS local plans which has an element of repetition that was required to be included in LSO local plans.

The plan has an element of organisational service planning language and repetition that is difficult to reduce/remove.

Comment/Response

When referring to other documents and strategies, it would be useful to provide details of what it is/who owns it/a link to the document, for clarification.

SFRS Comment/Action

The revised plan contains hyperlinks to relevant documents, where available, and provides information on ownership/author.

Comment/Response

It would be beneficial to include a foreword from a West Lothian elected member.

SFRS Comment/Response

It is agreed that the plan would be strengthened if a foreword from an elected member was included in the plan. The revised plan will include a foreword from an elected member.

Comment/Response

Remove reference to local authority area in whole of document, reference to West Lothian is sufficient

SFRS Comment/Action

Reference to local authority has been removed from the revised plan.

Comment/Response

In activity table explain RTCs AFAs and any other acronyms.

SFRFS Comment/Action

Responses relating to abbreviations captured in 5.2.4. The plan has been reviewed and terminology explained where necessary.

Comment/Response

Provide commentary to contextualize activity tables.

SFRFS Comment/Action

It is accepted that the activity table could be enhanced by providing some contextualisation. The plan has been revised to include information that contextualises the activity table

Comment/Response

In West Lothian profile, check and confirm ethnic minority increase. Consider rewording risk to ethnic minorities? Consider wording that ethnic minorities pose a risk ??? Consider elevating risk of elderly /aging population.

SFRS Comment/Action

The section in the plan that relates to the West Lothian Profile has been amended to take cognisance of these comments.

Comment/Response

Outcome graphs well received, but benchmark graphs would be better !

SFRS Comment/Action

It is accepted that the outcomes graphs could be enhanced by the use of benchmarking data. The revised plan will include revised outcome graphs.

Comment/Response

Consider inserting West Lothian Council in Community Needs box for achieving outcomes.

SFRS Comment/Action

This comment has been accepted, the achieving outcomes section of the plan has been revised to include community needs.

Comment/Response

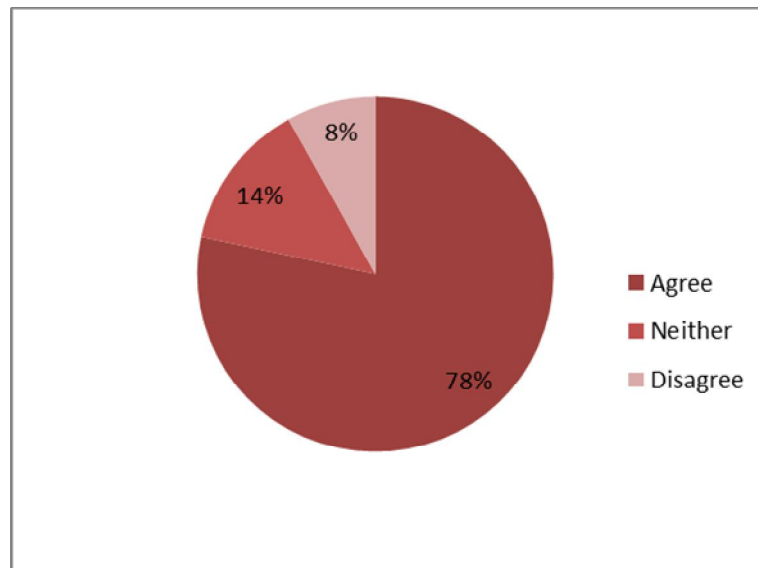
Consider making a point that the LSO is personally responsible for the plan.

SFRS Comment/Action

This comment is accepted, the foreword in the plan has been revised to depict that the LSO has ownership of the plan.

5.4 Profile and Risk (Quantitative Evaluation)

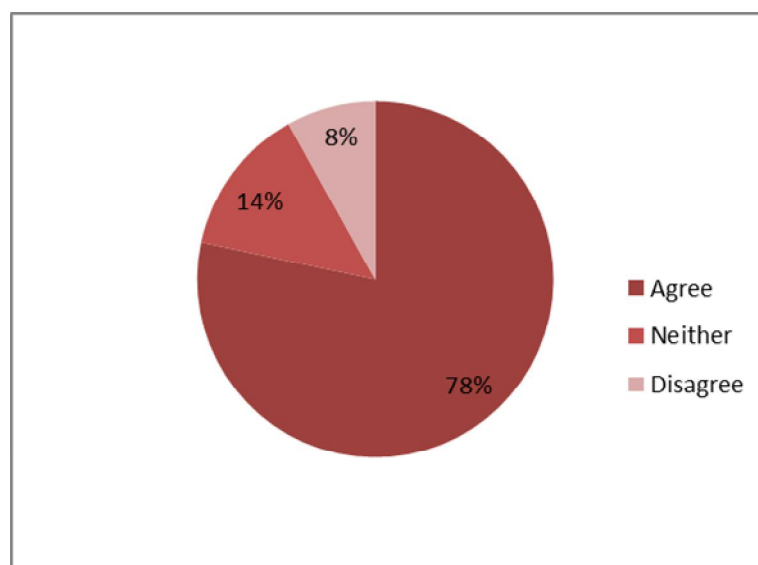
5.4.1 Q5. Priorities have been effectively developed.



SFRS Comment/Action

From the high proportion of respondents who agreed (or neither agreed or disagreed) it is indicative that there is a broad agreement that priorities have been effectively developed. No action required

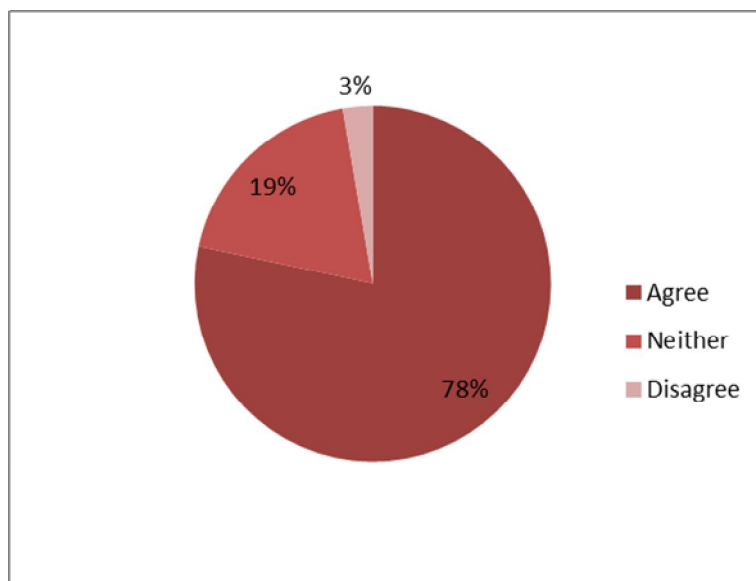
5.4.2 Q6. The Service understands local risks and uses this knowledge to plan how it deploys resources.



SFRS Comment/Action

From the high proportion of respondents who agreed (or neither agreed or disagreed) it is indicative that the SFRS understands local risks and uses this knowledge to plan how it deploys resources. No action required.

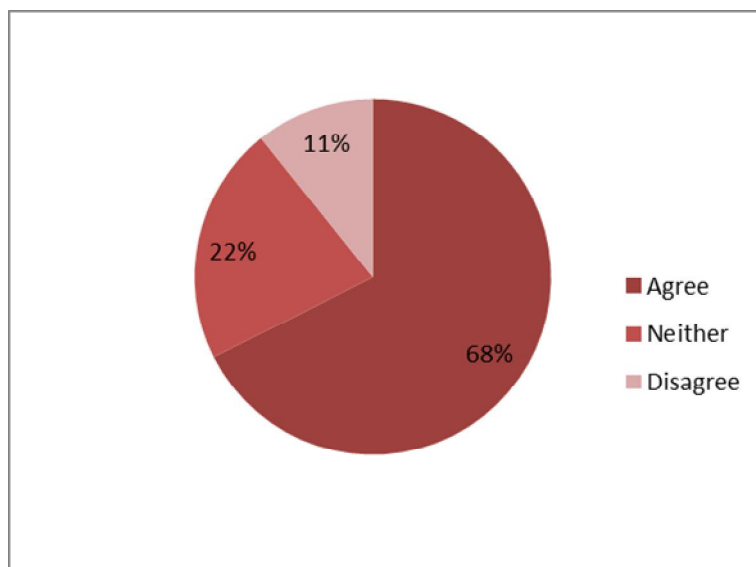
5.4.3 Q7. The plan shows how my local Service will meet Scottish Government National Outcomes.



SFRS Comment/Action

From the high proportion of respondents who agreed (or neither agreed or disagreed) it is indicative that the plan shows how the local Service will meet Scottish Government National Outcomes. No action required.

5.4.4 Q8. The plan shows how the Fire and Rescue Service's national Equality Outcomes will be met within my local area.



SFRS Comment/Action

The high proportion of disagree (or neither agree or disagree) responses leads to the conclusion that it could be clearer how the Fire and Rescue Service's national Equality Outcomes will be met within the local area.

The plan has been revised to make it clearer how the SFRSs national Equality Outcomes will be met within the local area.

5.5 Profile and Risk (Qualitative Evaluation)

Response/Comment

From the Consultation Paper I can see clearly what you will be doing to achieve it by. However, it would have been helpful to see HOW you are going to achieve it. ie youth engagement programme. How will these be delivered? School visits? If so is there an annual target for the number to be completed? During the four years (2014 - 2017) what will the coverage be? Its not clear what your measures will be. To continually reduce the number of x against a three year average is a bit vague.

Ward specific problems should be detailed to encourage more involvement by local members.

Present information that has reassurance built in ie. by telling me that there is an increase in dwelling fires I want to know how you are going to tackle this.

SFRS Comment/Action

It is recognised that the target setting within the plan could be more specific to the local area and be more focussed.

The plan has been revised to make targets more relevant to the local area.

Targets set in the plan are monitored and measured at the West Lothian Council, Services for Communities, Policy Development and Scrutiny Panel and the West Lothian Community Planning Leadership Board.

It is envisaged that Ward Plans will be developed to support the plan. Ward Plans will contain the detail of 'what will be done' and 'how it will be done' at ward level and these plans will contain the level of detail requested.

The Local Senior Officer will continue to report to the West Lothian Council, Services for Communities, Policy Development and Scrutiny Panel and the West Lothian Community Planning Leadership Board on performance.

The Local Senior Officer is also committed to developing Ward Plans to support the Local Plan.

Response/Comment

We expect local plans to set out local solutions to national priorities: there's less evidence of local tailoring than expected, as well as being less targeted. An example would be referencing chimney fires in rural and island communities, as there were 508 chimney fires recorded in the 2012-13 fire statistics report. Other specific risks with linked action, such as motorways, prisons and high rise flats should be included where relevant – this was more explicit in some plans than others.

SFRS Comment/Action

As the plan covers a large local authority geographical area where there can be diverse socio-demographic differences, reference to specific types of incidents linked to areas is considered to be too specific for a local plan. It is envisaged that the development of Ward Plans will capture this type of level of detail.

Comment/Response

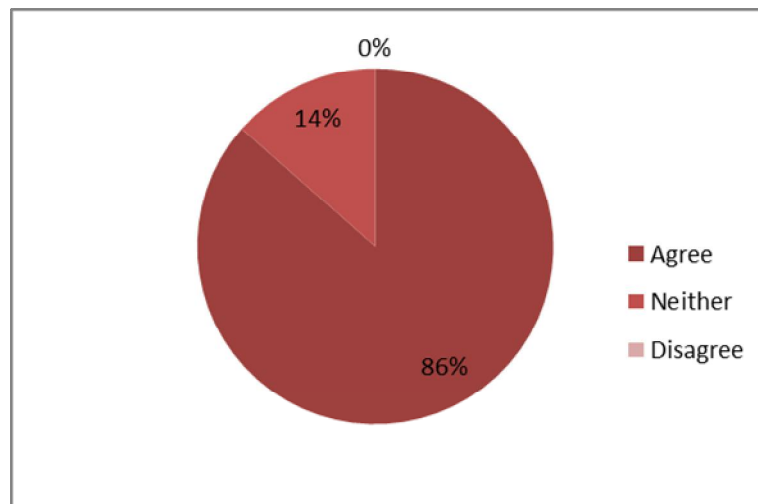
Under local assessment section, include reference to SOA, Strategic Assessment etc, a local SOA feel need to be included here.

SFRS Comment/Action

The revised plan will include a more explicit reference to the SOA Strategic Assessment.

5.6 Priorities (Quantitative Evaluation)

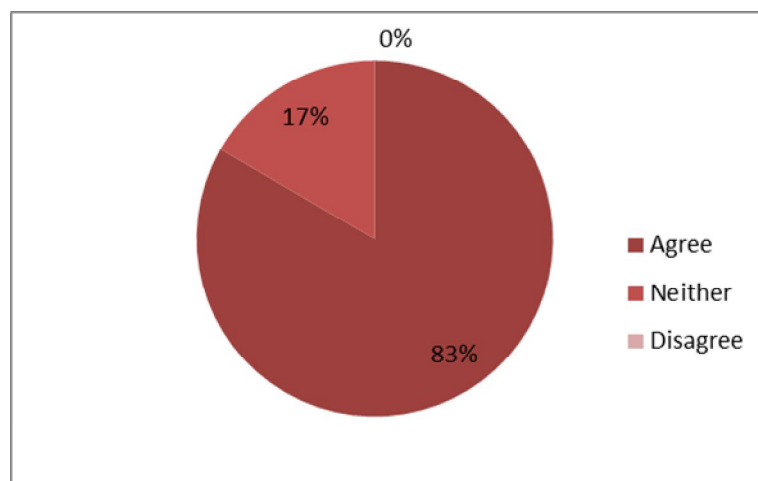
5.6.1 Local Risk Management and Preparedness



SFRS Comment/Action

The high proportion of agree (or neither agree or disagree) leads to the conclusion that the respondents are supportive of this priority. No action required.

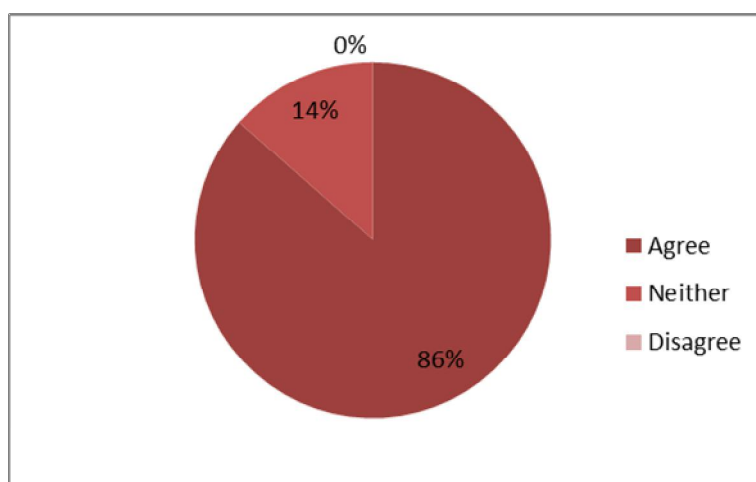
5.6.2 Reduction of Accidental Dwelling Fires



SFRS Comment/Action

The high proportion of agree (or neither agree or disagree) leads to the conclusion that the respondents are supportive of this priority. No action required.

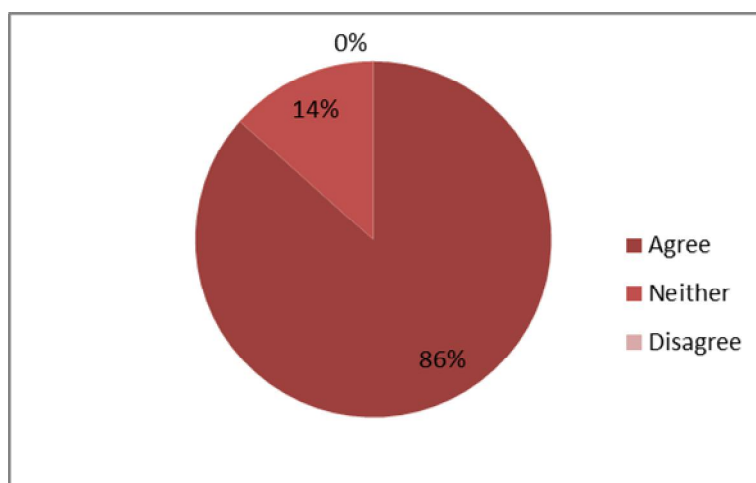
5.6.3 Reduction in Fire Casualties and Fatalities



SFRS Comment/Action

The high proportion of agree (or neither agree or disagree) leads to the conclusion that the respondents are supportive of this priority. No action required.

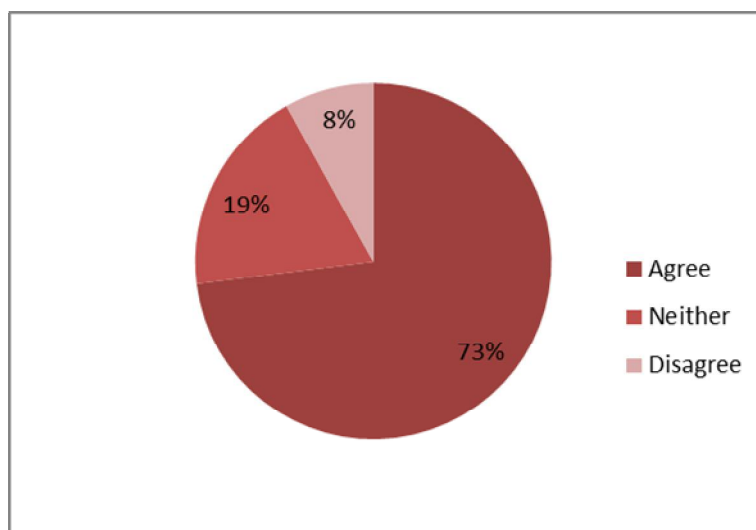
5.6.4 Reduction of Deliberate Fire Setting



SFRS Comment/Action

The high proportion of agree (or neither agree or disagree) responses leads to the conclusion that the respondents are supportive of this priority. No action required.

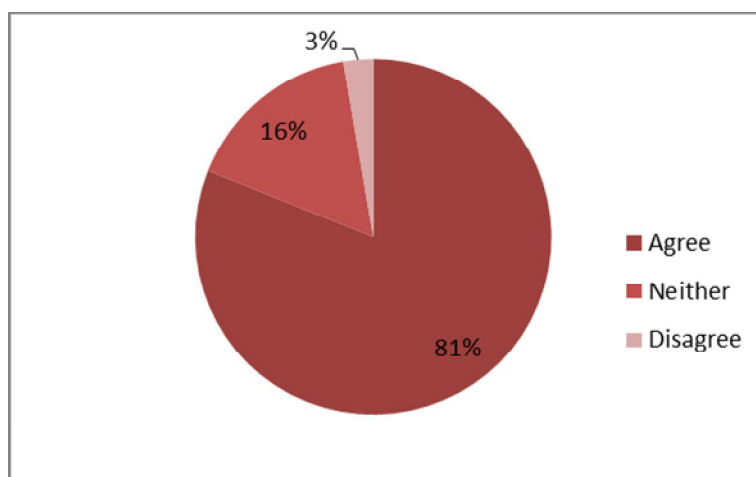
5.6.5 Reduction of Fires in Non Domestic Properties



SFRS Comment/Action

In recognising that a small proportion of respondents disagree with this priority, the high proportion of agree responses, taking into consideration respondents who neither agree or disagree, leads to the conclusion that the majority of respondents are supportive of this priority. No action required.

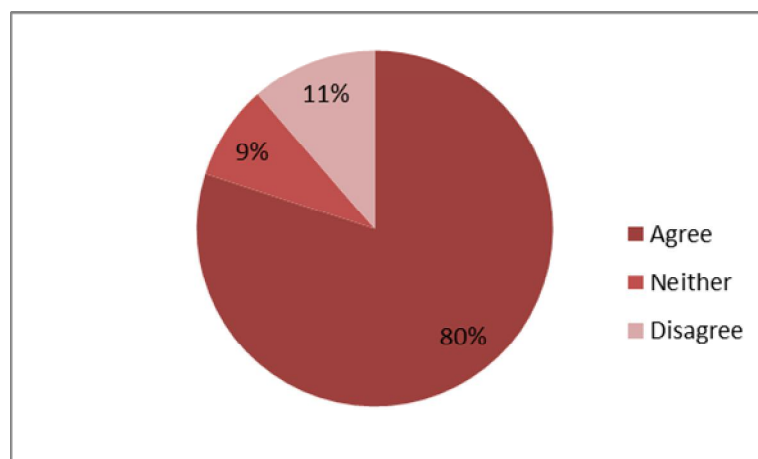
5.6.6 Reduction in Casualties from Non Fire Emergencies (including Flooding and Road Traffic Collisions)



SFRS Comment/Action

The high proportion of agree (or neither agree or disagree) responses leads to the conclusion that the respondents are supportive of this priority. No action required.

5.6.7 Reduction of Unwanted Fire Alarm Signals



SFRS Comment/Action

In recognising that a proportion of respondents disagree with this priority, the high propensity of agree, taking into consideration respondents who neither agree or disagree, leads to the conclusion that the majority of respondents are supportive of this priority. No action required.

5.7 Priorities (Qualitative Evaluation)

Comment/Response

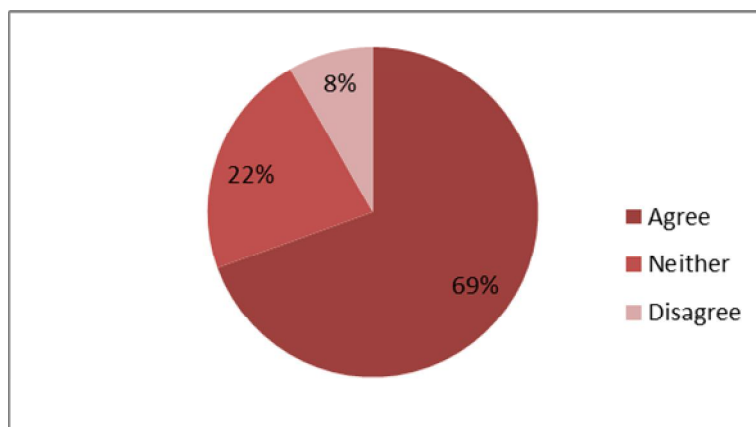
Where specific local risks / issues are identified, they could be enhanced with actions to be taken, outcomes to be achieved and stakeholders engaged with.

SFRS Comment/Action

This comment has been accepted. The plan has been revised to provide more focus on specific risks in the West Lothian area.

5.8 Achieving Local Outcomes (Quantitative Evaluation)

5.8.1 Q12. It is clear how the fire and rescue service are held to account for their performance in the local area.

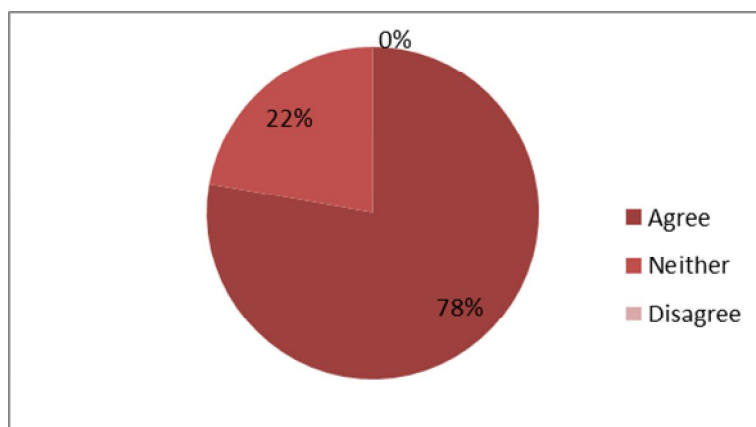


SFRS Comment/Action

The relatively high prevalence of disagree (or neither disagree or agree) responses indicates that there is a lack of clarity on how the SFRS is held to account for their performance in the local area.

A quarterly performance report is submitted to the West Lothian Council Services for Communities Policy Development and Scrutiny Panel (PDSP) who hold the LSO to account for performance in the local area. The minutes of these Scrutiny Panel meetings and the performance report are available on the West Lothian Council COINS system. THE LSO uses social media to inform when performance reports are published. The LSO will consider methods of making performance reports more widely available to stakeholders.

5.8.2 Q13. It is clear within the plan what legislation, plans and agreements have informed the development of this local plan. (Quantitative Evaluation)



SFRS Comment/Action

In recognising that a proportion of respondents neither agreed or disagreed that It was clear within the plan what legislation, plans and agreements have informed the development of this plan, consideration will be given to identifying a means of clarifying the relevant section of the plan.

5.9 Achieving Local Outcomes (Qualitative Evaluation)

Comment/Response

It is considered that there are opportunities to demonstrate a stronger alignment between the priorities of the West Lothian Single Outcome Agreement and the seven priorities identified with the draft Local Fire and Rescue Plan.

SFRS Comment/Action

This comment is accepted, a matrix has been included in the revised plan that indicates the alignment of the priorities in the plan with West Lothian SOA priorities.

Comment/Response

It is considered that whilst the plan contains a number of targets, these are either at a national level or generic i.e. continuous improvement. The plan would benefit from specific and measurable targets for West Lothian to allow panel members to exercise their scrutiny function.

There is no local feel to target setting 'contribute to 10%/5% SFRS reduction target' . targets in all of priorities need reworded to reflect local target e.g. ' we will reduce x year on year to contribute to the 10%/5% SFRS reduction target '

Many plans contain phrases such as "ensuring", "improving", "working with" and "identifying" where they may benefit from greater focus on specifics and results.

SFRS Comment/Action

It is accepted that the targets set in the plan could have a more local focus, which is linked to the SOA where appropriate. The targets set in the revised plan have been amended to reflect these comments.

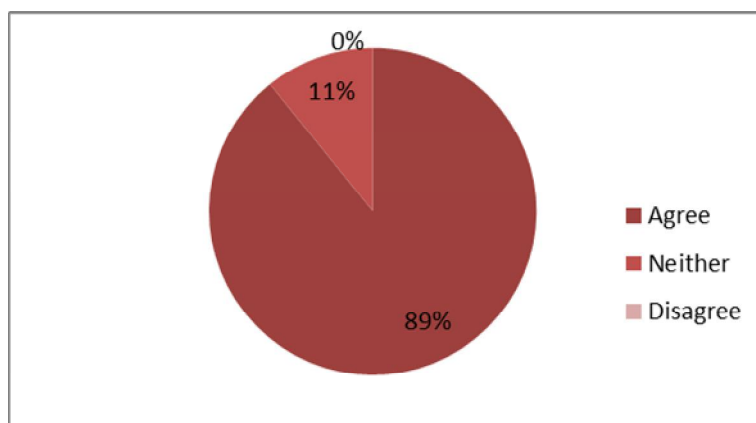
A revised reporting framework, which reflects the priorities in the plan is currently under development and will be submitted to the PDSP for approval once the plan is approved and adopted by West Lothian Council.

5.10 Let Us Know How We Are Doing (Quantitative Evaluation)

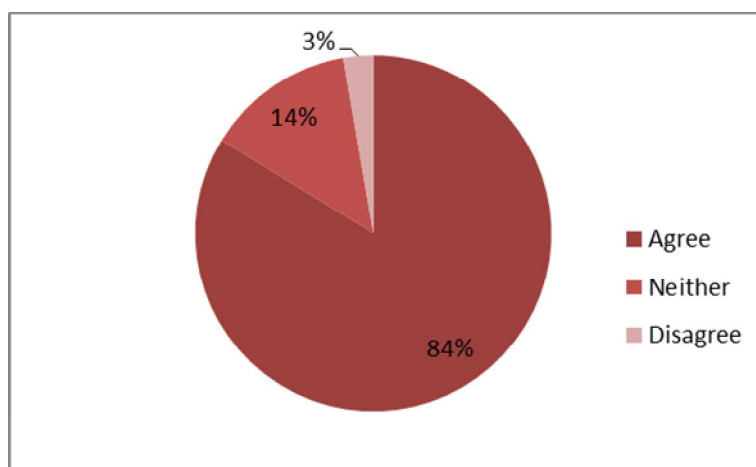
Whilst the responses and comments made in this section and section 5.11 below do not necessarily require to be taken into consideration in the context of amending the plan, the responses provide a valuable insight into the perceptions of the respondents of how the SFRs is performing. Whilst acknowledgement is taken of the responses and comments in this section, SFRS comments and actions are not considered to be required.

5.10.1 Let Us Know How We Are Doing

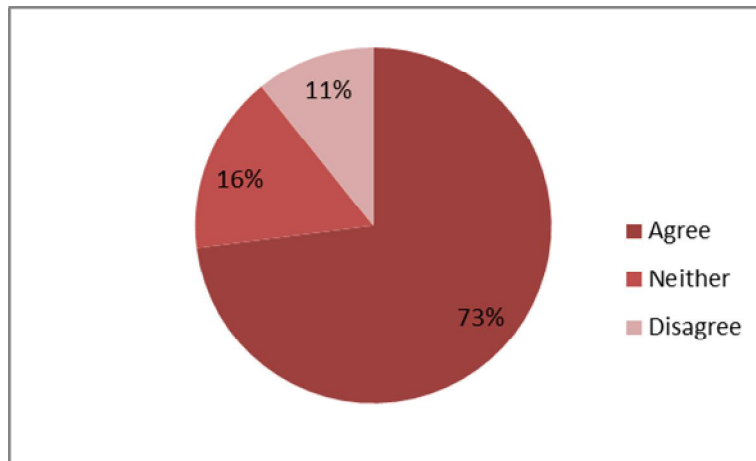
Q14.1 Prevention through education, advice and engagement is and should continue to be the key focus of our work and the local fire and rescue service plan.



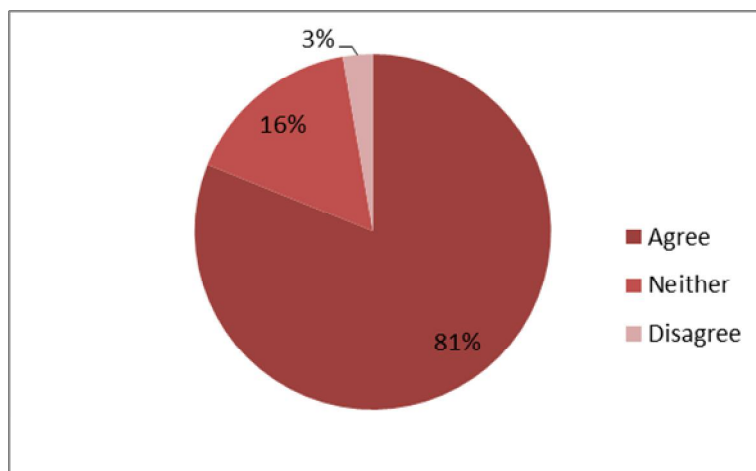
5.10.2 Q 14.2 Our priorities are sufficiently focussed on improving safety.



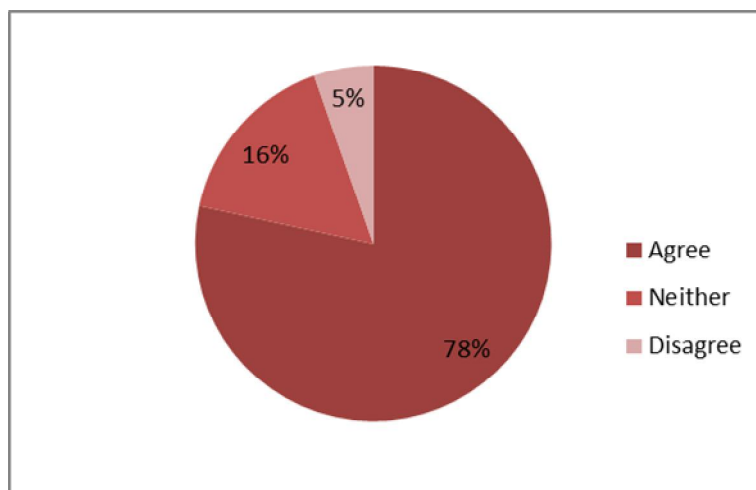
5.10.3 Q 14.3 We are adequately focussed on equality in communities



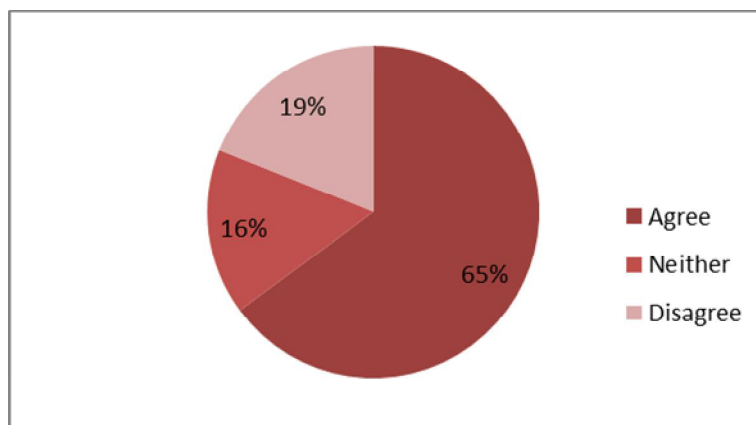
5.10.4 Q 14.4 I have confidence in the Fire and Rescue Service in my area.



5.10.5 Q 14.5 I am satisfied with the Fire and Rescue Service in my area.



5.10.6 Q 14.6 I know how to contact the Scottish Fire and Rescue Service for non emergency advice.



5.11 Let Us Know How We Are Doing (Qualitative Evaluation)

Responses/Comments

I applaud the ability to be able to drop in to our fire station at any time with any query pertaining to fire in the home and receive an honest, helpful and advisory response.

Our local station understands the community and will assist when requests are made.

Our community feels safe with our working local fire station on our doorsteps.

Very impressed with the response to my request for a home visit. Two first class Fire Servicemen thoroughly inspected four house and installed two fire smoke alarms.

6. CONCLUSION

- 6.1 It can be concluded that the consultation process proved a valuable tool in gaining an understanding of the views and perceptions of key stakeholders in West Lothian on the Local Fire and Rescue Plan.
- 6.2 As intimated in the main section of this report the Local Fire and Rescue Plan has been revised to take cognisance, where appropriate and relevant, of the comments and responses received during the consultation period.
- 6.3 The revised Local Fire and Rescue Plan is attached in Appendix 1 of this report.

7. RECOMMENDATION

7.1 West Lothian Council Services for Communities Policy Development and Scrutiny Panel is invited to:

- Note or otherwise the content of this report,
- Approve or otherwise the revised Local Fire and Rescue Plan for West Lothian 2014-2017,
- Agree to forward the Local Fire and Rescue Plan for West Lothian 2014-2017 to the West Lothian Council Executive for formal approval and adoption.

Gary Laing

Local Senior Officer

Falkirk and West Lothian

April 2014

Appendix 1 – Local Fire and Rescue Plan for West Lothian 2014-2017



West Lothian
Council

COUNCIL EXECUTIVE

WEST LOTHIAN LOCAL POLICING PLAN 2014/2017

REPORT BY HEAD OF HOUSING, CONSTRUCTION AND BUILDING SERVICES

A. PURPOSE OF REPORT

For Council Executive to approve the amended West Lothian Local Policing Plan for 2014/17.

B. RECOMMENDATION

That Council Executive approves the West Lothian Local Policing Plan 2014/17.

C. SUMMARY OF IMPLICATIONS

I Council Values	<ul style="list-style-type: none">• Being honest, open and accountable• Focusing on our customers' needs• Making best use of our resources• Working in partnership
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	The production and Council approval of the Local Policing Plan is a statutory requirement of the Police and Fire Reform (Scotland) Act 2012.
III Implications for Scheme of Delegations to Officers	None at this stage.
IV Impact on performance and performance Indicators	A suite of performance indicators will be established following final approval of the plan
V Relevance to Single Outcome Agreement	This paper will support the outcome – We live in resilient, cohesive and safe communities.
VI Resources - (Financial, Staffing and Property)	The council contributes to directly and in partnership to the delivery of the plan
VII Consideration at PDSP	Services for the Community PDSP on the 5 February and the 8 April 2014.
VIII Consultations	Police Scotland

D. TERMS OF REPORT

D.1 Background

Under the Police and Fire Reform (Scotland) Act 2012 Section 41E, Police Scotland must prepare a Local Policing Plan for each local authority area and submit it for approval to the local authority for which the plan relates.

At the time of the establishment of the new Police Scotland service a one year interim Local Police Plan for each Local Authority area covering the period 2013-2014 was developed and this was considered by the Services for the Community PDSP and then approved the Council Executive.

D.2 Police Scottish Local Policing Plan for West Lothian 2014 – 2017

The draft West Lothian Local Police Plan 2014-2017 was considered at the Services for the Community PDSP on the 5 February 2014 and the Panel requested three amendments to the plan.

- Increased linkages to the West Lothian Single Outcome Agreement
- Local performance targets for West Lothian
- A West Lothian Resource Plan

Following positive discussions between council officers and Police Scotland the revised plan (Appendix 1) addresses each of the above, in that the plan now includes improved alignment to the SOA, specific local performance targets and a section on police resources. The revised plan was then recommended for approval by Council Executive by the Services for the Community PDSP on the 8th of April 2014.

E. CONCLUSION

This report provides Council Executive with the opportunity to consider the West Lothian Local Policing Plan 2014/17 as a statutory requirement of the Police and Fire Reform (Scotland) Act 2012.

The Plan aligns to the priorities of the West Lothian Strategic Assessment on Community Safety and continues with the excellent partnership working on Community Safety which is evident in West Lothian.

F. BACKGROUND REFERENCES

Services for Community PDSP – 19 March 2013

Council Executive – 23 April 2013

Services for the Community PDSP – 5 February 2014

Services for the Community PDSP – 8TH April 2014

Appendix: 1

Contact Person: Alistair Shaw

Alistair Shaw
Head of Housing, Building and Construction Services
15 April 2014



POLICE
SCOTLAND

West Lothian
Local Policing Plan 2014-2017

Contents

1. Introduction and purpose of plan
2. Foreword
3. How we identified our priorities
4. Local Policing arrangements
5. National Outcomes
6. Performance and Accountability
7. Priorities and Objectives
8. Local Scrutiny and Engagement
9. Equalities
10. Local Contact Details

Appendix A – Community Safety Key Themes

Appendix B – Local Consultation Results

Appendix C – Police Officer Resource Levels J Division

Appendix D – Strategic Policing Priorities and National Outcomes

Draft
West Lothian Local Policing Plan 2014-2017
Policing Plan for 2014-2017

1. Introduction and purpose of plan

This plan sets out the local policing priorities and objectives for West Lothian for 2014-2017 and is a statutory requirement of the Police and Fire Reform (Scotland) Act 2012. It is produced as part of a planning process, which takes account of the Scottish Government's overarching vision for public services, the Strategic Police Priorities set by Scottish Ministers, the Scottish Police Authority's Strategic Police Plan and the Chief Constable of Scotland's Annual Police Plan.

The Local Policing Plan for West Lothian represents a critical part of the delivery process for Police Scotland, demonstrating our commitment to local policing within the national planning framework and enabling us to respond effectively to the concerns of local communities as well as meet and tackle nationwide demands. This local authority plan will be supported by nine community policing plans, which respond directly to local needs and demands.

2. Foreword

Chief Constable Sir Stephen House QPM

The first year of Police Scotland has seen significant change in many aspects of the organisation; however, the delivery of locally focused operational policing remains the bedrock of this service. I remain strongly committed to the principle that community-based policing, which responds to local need and demand, is crucial to delivering services that keep people safe and maintain public confidence.

One of the ways in which we can visibly demonstrate this commitment to local policing is by listening to communities and asking them to help shape our priorities. We have consulted widely across the council area with local people and other organisations to help identify our priorities. By combining the information we received through this consultation process with analysis of crime and other performance data we have established the priorities and objectives that are set out in this plan.

In developing this plan the Local Policing Team, led by the Local Commander, has worked closely with public, private and third sector organisations as well as directly with communities, because we recognise that partnership working is critical to making our communities safer. Importantly, this approach has also ensured that our planning process is aligned to the broader vision set out in the Community Plan and supports the Single Outcome Agreement. This plan is therefore a commitment to working across agencies to deliver better outcomes for communities as well as setting out how policing will be delivered in this area.

I am pleased to say that we have achieved much in the first year of Police Scotland to tackle crime and prevent harm - reducing the number of people who have been the victims of violence and the number killed and injured on our roads as well as addressing other crucial priorities for communities. This plan sets out an agenda to build on that success by tackling the issues that will improve the safety and well being of communities across this local authority area.

Vic Emery OBE, Chair – Scottish Police Authority

I passionately believe that the establishment of Police Scotland and the SPA has created significant opportunities to strengthen the effectiveness of policing. We want you the public to have a real say on local priorities and for policing to listen to that public voice. This plan is where that comes together. It sets out what your local priorities are – identified from what local people are saying is most important to them, and underpinned by local evidence and intelligence gathered by policing in this area.

We want you to be able to question, and judge, how well the police are performing against those priorities. So we will expect your local commander to report publicly and regularly on how they are achieving the priorities set in this plan, so you and your community can assess for yourselves how policing is working for you.

Draft

West Lothian Local Policing Plan 2014-2017

We want residents to be able to see how money invested in policing is being used and what results it brings, and to understand better how national and local policing decisions are made and why.

Scotland is a country with reducing levels of crime, and a strong bond of trust between the Police service and the Scottish public. Local partnerships, a focus on prevention and collaboration, and genuine accountability at both local and national level underpin that bond.

Working together to turn this plan into results, as professionals and members of the public, is about making this part of Scotland a place of greater safety – and a greater place to live.

Councillor George Paul, Executive Councillor – Services for the Community

Ensuring that all our citizens can live their lives free from fear of crime is a high priority for West Lothian Council and that is why we welcome the Local Policing Plan for West Lothian covering the period 2014-2017.

West Lothian Council and our Community Planning Partners have an excellent record of working in partnership with Police Scotland to improve the safety of our communities and it is vital that this work continues during a period of change for the Police.

Much progress has been made over the last year and I am confident this will continue over the lifetime of this plan and beyond. The service has set ambitious targets for improvement over the plan period, which we welcome. The targets will only be achieved through effective partnership working between Police Scotland, the Council and the wider partnership working with our communities.

Chief Superintendent Gillian Imery, Local Police Commander

Local policing continues to be the focus of Police Scotland, and I am delighted to present the Local Policing Plan for West Lothian. The priorities set out in the plan have been developed in consultation with local people and partner agencies, taking account of crime analysis and national policing priorities.

Effective policing is based upon sound partnerships, shared information and strong collaboration. This is reflected in our local outcomes and priorities, which rely on excellent local delivery and joint working across partnership and geographic boundaries for successful delivery.

By working to meet the needs of local communities, and delivering a high standard of service, we will continue to maintain public confidence and satisfaction. Our activity will target those who cause the most harm within our communities, and will protect those who are most vulnerable. We will maximise all opportunities to reduce and prevent crime and disorder, and ensure that officers are deployed in the right place, at the right time.

The priorities and objectives outlined in this plan provide a clear focus for local policing, whilst retaining sufficient flexibility to adapt to emerging issues. I am confident that the

West Lothian Local Policing Plan 2014-2017

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West Lothian Local Policing Plan 2014-2017

plan demonstrates our commitment to meet the needs of the communities we serve in West Lothian.

West Lothian Local Policing Plan 2014-2017

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3. How we identified our Priorities and Objectives

The Scottish Policing Assessment sets out the priorities for the Police Service of Scotland to the year 2015. It is a key document for the police in the continuous process of meeting future policing challenges and ensuring that the service the police provide to the communities of Scotland is of a high standard.

The Assessment draws on information and intelligence provided by all the Scottish forces and law enforcement agencies as well as information from key partner agencies including the Scottish Government, Local Authorities and the public. It is through this assessment that risk in relation to crime and disorder is prioritised.

The priorities identified in this plan have been identified through assessment of current trends in community safety, emerging issues and priority areas of concern. Appendix A lists the key cross cutting themes that impact upon, but are not limited to community safety. These are issues that need a high-level multi agency response to ensure the maximum benefit to communities and individuals.

The 2012-2015 Strategic Assessment was the third undertaken by West Lothian's Community Safety Partnership, and forms the basis of a three year Community Safety Strategy in West Lothian.

Building strong communities is a priority for the Community Planning Partnership and ensuring that our citizens can live their lives free from the fear of crime is a high priority for West Lothian.

Throughout 2013 we consulted with people from across West Lothian about the issues that were of greatest concern to them. These consultation results made a critical contribution to identifying issues for local communities and these have been translated into the key policing priorities for West Lothian. Appendix B shows the results of our consultation.

4. Local Policing Arrangements

Our mission is to keep people safe. We aim to deliver policing that is visible, accessible and responsive to the needs of the communities across West Lothian.

The Local Police Commander for West Lothian will direct their Local Area Commander in order to deliver an effective policing service against our key priorities.

We will continue to respond quickly and effectively to public demand by answering all calls and operational requests made of us.

We have nine local Community Policing Teams based within each electoral ward to tackle local problems and issues.

In addition to the Local Policing Plan for West Lothian, each ward will have an individual plan, which will address the priorities specific to that ward and neighbourhood as well as linking closely with the plan for West Lothian.

These plans will be delivered by identifiable officers located in each geographic community, continuing engagement with the communities and adopting a shared partnership problem-solving approach to dealing with issues. Individual Multi Member Ward community policing plans are available at www.scotland.police.uk

Local policing arrangements are aligned to the Community Safety Partnership working towards joint community safety priorities.

Uniformed officers are engaged in community policing and response roles; additional funded officers form part of joint partnership Community Policing Teams, working closely with officers from the local authority and third sector. Response resources comprise five Response Policing Teams, each with an identified Inspector. Local Community Policing Teams are managed through four community-based Inspectors. A Criminal Investigation Department and other specialist units support these resources.

Within West Lothian there are 106 officers who form part of the Community Policing Teams. 4 Inspectors, 5 Sergeants, 9 Community Beat Officers, 27 Safer Neighbourhood Officers (21 funded by West Lothian Council), 3 School Link Officers (1 funded by West Lothian Council), 8 Town Centre Officers and 50 of the recently established Community Tasking Team. These officers will focus on community priorities identified through local consultation and highlighted in the Local Policing and Multi Member Ward Plans.

The West Lothian policing area forms part of the Lothians and Scottish Borders Division (J Division). Appendix C shows the Police Officer resource levels for J Division.

The local Community Policing Team will make sure you know who they are and how you can contact them. They will be visible and accessible in your communities, working first and foremost on community priorities. They will attend regular community meetings, work with you to identify local concerns and work with others to solve these problems. They will regularly update you with progress made.

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West Lothian Local Policing Plan 2014-2017

This blend of preventative policing set within the community planning context is targeted at providing an effective and efficient police service whose aim is community reassurance and increasing community well-being. Measures of satisfaction from public perception surveys will be used when examining performance and all policies, procedures and practices will be Equality Impact Assessed.

5. National Outcomes

The Scottish Government has 16 National Outcomes, which demonstrate a commitment to creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth. Policing in West Lothian can make a significant contribution to improving these outcomes for this area by contributing to the community planning arrangements across West Lothian.

The priorities in this plan will be reflected in the Single Outcome Agreement for West Lothian, which will also include a range of indicators and targets focused on delivering improved services.

Scottish Ministers have also established Strategic Policing Priorities and these reflect the contribution that policing can make to achieve the National Outcomes.

Our local priorities align to West Lothian's Partnership Priorities, the Strategic Policing Priorities and the Government's National Outcomes as follows:

Priority	West Lothian Priorities	Strategic Policing Priorities	National Outcomes
Protecting People	Building Strong Communities Protecting People at risk	1, 2, 3, 4	5, 7, 8, 9, 11, 13, 16
Reducing Antisocial Behaviour	Building Strong Communities Protecting People at risk	1, 2, 4	5, 8, 9, 11, 13
Reducing Violence	Building Strong Communities Protecting People at risk	1, 2, 4	5, 7, 8, 9, 11
Tackling Substance Misuse	Building Strong Communities Protecting People at risk	1, 2, 4	7, 8, 9, 11
Making our Roads Safer	Building Strong Communities Protecting People at risk	1, 2, 4	9, 11
Tackling Serious Organised Crime	Building Strong Communities Protecting People at risk	1, 2, 4	9, 11, 13
Tackling Acquisitive Crime	Building Strong Communities Protecting People at risk	1, 2, 4	9, 11

Further information on National Outcomes and Strategic Policing Priorities can be found at Appendix D or accessed at www.scotland.gov.uk

6. Performance and Accountability

To support this plan Police Scotland will develop a national performance framework which allows the service to measure progress, monitor activity, identify key areas where resources need to be focused and demonstrate how successful we are in meeting our key priorities and objectives as set out in this plan.

Performance for the West Lothian policing area will be compared to year end performance with a 1% increase or decrease where appropriate. West Lothian will also be benchmarked nationally with Police Scotland and another Policing area as identified by Police Scotland. This information will be supplied quarterly through agreed scrutiny arrangements.

We are committed to publishing our performance information and will use this as the foundation for reporting to West Lothian Council and local communities.

This information is available upon request or at www.westlothian.gov.uk

7. Priorities and Objectives

Priority 1 – Protecting People

Our officers are committed to protecting victims of serious sexual crime and vulnerable groups, including adults, children, and people experiencing domestic abuse.

Public protection activities in West Lothian ensure the most vulnerable members of our community are identified and given the support they require. It is vital that children and adults at risk, victims of serious sexual crime, domestic abuse or other vulnerable individuals are identified and offered the appropriate assistance to prevent an escalation of abuse or an increase in offending behaviour.

We will:

- Work in partnership to identify and protect those at risk through effective early intervention, education and enforcement;
- Proactively share information and intelligence to task and coordinate resources and change trends;
- Work together to deliver intelligence-led initiatives and reassure those individuals, groups and communities affected;
- Support, manage and rehabilitate offenders and support victims and their families.

Objectives:

- Increase detection rates for crimes of domestic abuse by 1%
- Increase the detection rate for sexual offences by 1%

The focus of police activity will be to ensure that the most vulnerable people within our communities are protected and feel safe. This will be achieved by identifying victims of crime and ensuring support mechanisms are in place for them.

The Domestic Abuse Investigation Unit will target the perpetrators of serious and complex domestic abuse cases and provide early and effective support to victims and their families. The Rape Investigation Unit will continue to deliver a victim-centered approach in partnership, provide investigative consistency and place victim welfare and support at the forefront of the investigation.

Priority 2 – Reducing Antisocial Behaviour

Our priority is to reduce antisocial behaviour and hate crime within our communities. Antisocial behaviour and hate crime covers a range of activity that can have a detrimental impact upon the quality of life of individuals and communities. As well as making life unpleasant, it can hold back the regeneration of areas and create an environment where more serious crime can take hold. Both are also known to have an impact upon community cohesion.

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West Lothian Local Policing Plan 2014-2017

We will:

- Work in partnership to prevent and reduce antisocial behaviour and hate crime through effective early intervention, enforcement and education;
- Proactively share information and intelligence to task and coordinate resources and change trends
- Work together to deliver intelligence-led initiatives, reassure communities affected, support and rehabilitate offenders and support victims.

Objectives:

- Reduce the number of antisocial behaviour incidents by 1%
- Increase the detection rate for hate crime by 1%

The antisocial behaviour picture in West Lothian is positive with proactive tasking and a preventative philosophy adopted throughout the partnership. There have been consistent decreases since the introduction of partnership Community Policing Teams and the establishment of the West Lothian Community Safety Unit.

Hate crime prevention activity has focused on building stronger links within our communities which has increased public confidence in reporting such crimes. There has also been greater engagement with secondary schools with community officers delivering bespoke educational inputs.

Priority 3 – Reducing Violence

Violence in our communities will not be tolerated and our officers are dedicated to making West Lothian a safer place. Violent crime impacts on all members of society and is not limited by age, sex or ethnic origin. It causes fear amongst people such as the vulnerable and elderly and has a damaging impact on communities.

We will:

- Work in partnership to prevent and reduce instances of violence through effective early intervention, enforcement and education;
- Proactively share information and intelligence to task and coordinate resources and change trends;
- Work together to deliver intelligence-led initiatives, reassure communities affected, support, manage and rehabilitate offenders and support victims of violent crime.

Objectives:

- Reduce the level of violent crime by 1%
- Increase the proportion of positive stops and searches for offensive weapons by 1%

The impact and consequence of a violent incident has everlasting consequences upon all concerned. Weapon related crime and public space violence will be tackled through

effective tasking and patrolling of identified hot spots. We will use 'Stop and Search' powers to keep people safe. The use of the stop and search tactic will be lawful, proportionate, intelligence-led and respectful.

Prevention activity will focus on the West Lothian 'Straight to the Point' anti-knife campaign, which highlights the risks associated with possessing or using a weapon and the national 'No Knives Better Lives' campaign which educates young people about the dangers and consequences of carrying knives. In relation to licensed premises the West Lothian Best Bar None licensed venues initiative focuses on public safety and customer care and important issues as Prevention of Crime and Disorder, Public Safety and Prevention of Public Nuisance.

Priority 4 – Tackling Substance Misuse

Tackling the community and social harm caused by drug and alcohol misuse is imperative in West Lothian. Substance misuse is a complex problem that impacts upon all our communities. It has far-ranging and harmful implications for individuals, families and neighbourhoods. The link between substance misuse and crime and disorder is well known and by tackling the harm caused to public safety we will improve the quality of life for many people in West Lothian and reduce the negative effect on local communities.

We will:

- Work in partnership to prevent drug and alcohol misuse through effective early intervention, education and enforcement;
- Proactively share information and intelligence to task and coordinate resources and change trends;
- Work together to deliver intelligence-led initiatives and reassure those communities affected;
- Support, manage and rehabilitate offenders and support victims of crime who are victimised as a result of drug and alcohol misuse

Objectives:

- Increase the proportion of positive stops and searches for drugs by 1%
- Increase the number of licensed premises visits (on/off sales premises) by 1%

In partnership we will focus on the needs of the most persistent offenders in West Lothian whose crimes are committed in order to sustain their dependency on drugs, alcohol and other substances and reduce their level of offending.

Enforcement activity will continue to be partnership focused, which will not only target offenders but also have a lasting impact on the whole community. Where evidence exists of a licensed premise operating in a manner inconsistent with the licensing objectives or outwith the conditions of a Premises License we will work with the Licensee to address the issue and where this fails to succeed robust interventions will be implemented.

Priority 5 – Making our Roads Safer

We are dedicated to keeping people safe on our roads and enhancing and improving the safety of the community by reducing the number of incidents and casualties from road traffic collisions. Road safety affects everyone who lives, works or visits West Lothian. Most people use the roads every day in some capacity and it is therefore essential to ensure we can all use the roads safely.

We will:

- Work in partnership to improve road safety through enforcement, engineering, education and effective early intervention;
- Proactively share information and intelligence to task and coordinate resources and change trends;
- Work together to deliver intelligence-led initiatives and reassure communities affected by serious road traffic collisions;
- Support victims of serious road traffic collisions and support and rehabilitate offenders.

Objectives:

- Reduce the number of people killed or seriously injured on our roads in line with National targets
- Increase the number of people detected for drink/drug driving offences by 1%

There are a number of major arterial routes that run through West Lothian, which link the east, and west of Scotland. This, along with numerous rural routes linking towns and villages, make the county a risk location for road traffic collisions. Our officers will be visible to deter and detect poor driving.

Young drivers remain a priority and prevention activity is delivered through West Lothian's WestDrive initiative for young driver education, which targets 16-18 year old students. We will continue to work with others to improve awareness of road safety and challenge offending behaviour in order to keep people safe on West Lothian's roads

Priority 6 – Tackling Serious Organised Crime

Our officers are committed to tackling serious organised crime and reducing the impact and harm it has on our communities. Serious organised crime impacts negatively on all aspects of community life. It can fuel street crime, increase the fear of crime and have a detrimental financial effect upon local economies.

We will:

- Work in partnership to prevent serious organised crime and target, disrupt and deter those involved;
- Proactively share information and intelligence to task and coordinate resources;

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West Lothian Local Policing Plan 2014-2017

- Work together to deliver intelligence-led initiatives and reassure communities and businesses affected;
- Educate, support, divert and deter those at risk of becoming involved in organised crime and support victims.

Objectives:

- Increase the number of cash seizures and restraints through the Proceeds of Crime Act (POCA) legislation by 1%
- Increase the number of people detected for supplying drugs by 1%

Criminals involved in serious organised crime have an impact on society as a whole by impinging on local economies and targeting individuals within our communities. These criminals can generate substantial income to the detriment of genuine businesses by using apparently legitimate businesses as a cover for their activities.

We will strive to develop a wider intelligence picture of serious organised crime groups in West Lothian and provide additional opportunities to implement Detect, Divert, Disrupt and Deter tactics under the national Serious Organised Crime Strategy.

Priority 7 – Tackling Acquisitive Crime

Acquisitive crime has a detrimental effect on our communities. We will endeavor to reduce the amount committed, keep victims and witnesses informed and pursue and capture those involved in such activity. Prevention is also key to ensuring that our communities do not fall victims to crimes such as Housebreaking, which contribute significantly to the levels of 'Fear of Crime'.

We will:

- Work in partnership to prevent and reduce acquisitive crime and target, disrupt and capture those involved;
- Proactively share information and intelligence to task and coordinate resources;
- Work together to deliver intelligence-led initiatives and reassure communities and businesses affected;
- Support victims and educate and support those at risk of becoming involved in acquisitive crime.

Objectives:

- Reduce the number of dwelling houses broken in to by 1%
- Increase the detection rate for break-ins to dwelling houses by 1%

We will support Neighbourhood Watch Schemes and take proactive steps to provide our communities with vital information and advice to safeguard their homes, businesses and personal belongings.

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West Lothian Local Policing Plan 2014-2017

We will target harden premises, increase natural surveillance and target criminals by the proactive use of police powers and involvement in local and national crime initiatives.

West Lothian Local Policing Plan 2014-2017

Draft

8. Local Scrutiny and Engagement

The Police and Fire Reform (Scotland) Act 2012 includes a framework for local scrutiny and engagement arrangements between local authorities and the police service.

In West Lothian local scrutiny and engagement will be undertaken by the Policy Development and Scrutiny Panel for Services to the Community, which will ensure that the locally set objectives will deliver the statutory purposes of improving the safety and wellbeing of the people. It will ensure that local conditions are understood and that community concerns are reflected. It will promote joint working to secure better outcomes and best value and will provide strategic leadership in order to influence service delivery and support continuous improvement by providing constructive challenge.

Robust monitoring and reporting processes are instrumental in ensuring that West Lothian remains on track to deliver against local objectives within the resources available.

9. Equalities

All our work is underpinned by our commitment to equality and diversity, both in our dealings with the public we serve as well as our own staff.

We recognise that effective and fair policing is about reflecting the needs and expectations of individuals and local communities, as our formal public consultation emphasises. Survey results show that different communities have differing expectations and contrasting experiences of the service provided by the police. Our aim is to ensure that our service is fair and consistent to all, according to their needs, keeping those who are most vulnerable safe.

To further this aim, and satisfy our statutory duties under The Equality Act 2010 we have developed national equality and diversity outcomes to explicitly outline our commitment to meet the needs of members of the public and our staff who share relevant protected characteristics.

In this local policing plan we have identified local priorities and objectives, which will contribute towards achieving these outcomes, and we will report on progress in the Chief Constable's Annual Report.

Our equality and diversity outcomes are:

- People better recognise hate crimes and incidents and feel confident in reporting them
- Individuals within protected groups feel safe and secure within their local community
- Victims of gender-based violence are confident that the police are responsive to their needs
- People from, and across, protected groups are meaningfully engaged with us and their views contribute to service improvements
- Everyone in West Lothian is able to contact the police when they require our assistance and this experience is positive
- We have a workforce that is reflective of our communities to increase trust and confidence in the police
- We have a workforce where people feel valued and encouraged to maximise their potential to ensure the most efficient and effective service is delivered

10. Local Contact Details

Contact details

West Lothian Civic Centre
Howden Road South
Livingston
West Lothian
EH54 6FF

Telephone number

Single Non Emergency Number
101

Email

For all non-emergency issues or enquiries relating to Police business, you can contact us via:

WestLothianLPP@scotland.pnn.police.uk

This group email address is provided for you to discuss non-urgent local policing issues. It should not be used to report a crime or incident.

For information about your local Community Policing Team and other services that Police Scotland provides, please refer to the Force website at:

www.scotland.police.uk

We are here to help

We will continue to keep in touch with you to keep you updated on the ongoing work being carried out to tackle the issues that are affecting life for you in West Lothian.

- If you have any concerns or issues you wish to discuss, contact your local Community Policing Team.
- Dial 999 for an emergency that requires urgent police attention.
- For non-emergency contact, call 101, the single non-emergency number.
- If you have information about crime in your area and wish to provide it anonymously, call CRIMESTOPPERS on 0800 555 111
- Service users who are deaf or have a hearing impairment can contact Police Scotland via TextRelay in an emergency on 18000 or non emergency on 18001 101.

Appendix A – Community Safety Key Themes for 2012-2015

Early Intervention

The aim of early intervention is to prevent and divert young people from offending and prevent the escalation of crime and disorder. It aims to enhance opportunities, improve outcomes and prevent the need for support from more specialist services at a later stage in their lives.

Young People

West Lothian has the youngest population in Scotland, with an average age of 38 years compared with 40 years nationally, with a rapidly expanding young population in recent years. Findings supported by a number of bodies indicate that young people are more likely to become repeat victims of crime, but were less likely to report incidents to the police than adults. Supporting young victims of crime and preventing young people from offending are important themes for West Lothian.

Vulnerable Groups

Managing and supporting the complex needs of vulnerable groups involves multiple agencies and often impacts on community safety resources. Vulnerability can arise through circumstances such as being a missing person, substance misuse, mental health issues or self-harming. People in vulnerable groups can also be at a higher risk of becoming victims of crime. The protection of these groups is a key responsibility for police and partners.

Repeat Service Users

'Repeat Service Users' can be victims, complainers and offenders. A minority of individuals commit a disproportionate amount of crime and antisocial behaviour and a similar situation can occur with welfare concern incidents where a disproportionate number of calls are received from a small number of vulnerable individuals.

Appendix B – Local Consultation Results

The priorities for the nine Multi Member Wards were identified during our most recent consultation.

Ward 1 - Linlithgow

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 2 - Broxburn, Uphall and Winchburgh

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 3 - Livingston North

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 4 - Livingston South

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 5 - East Livingston and East Calder

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 6 - Fauldhouse and the Breich Valley

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 7 - Whitburn and Blackburn

Priority 1 Reducing Antisocial Behaviour

Priority 2 Tackling Substance Misuse

Priority 3 Making our Roads Safer

Priority 4 Tackling Acquisitive Crime

Ward 8 - Bathgate

- Priority 1 Reducing Antisocial Behaviour
- Priority 2 Tackling Substance Misuse
- Priority 3 Making our Roads Safer
- Priority 4 Preventing Violence (in the night time economy)
- Priority 5 Tackling Acquisitive Crime

Ward 9 - Armadale and Blackridge

- Priority 1 Reducing Antisocial Behaviour
- Priority 2 Tackling Substance Misuse
- Priority 3 Making our Roads Safer
- Priority 4 Tackling Acquisitive Crime

Appendix C – Police Officer Resource Levels J Division

The information contained within this appendix highlights the national, regional and local police officer posts available to the Lothians and Scottish Borders Division (J Division) to keep people safe.

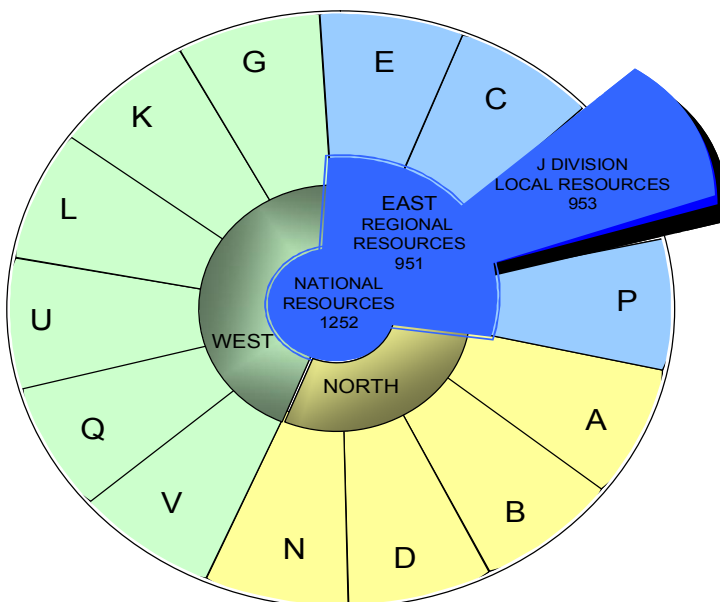
Local policing is at the heart of Police Scotland and the creation of a single policing service has allowed us to create a demand led policing service that protects and enhances local policing for our communities. It also provides equal access to specialist resources, whether that is specialist police officers or equipment, no matter where or when the demand.

Under a single policing service we now allocate and operate our police officer posts over three tiers – local, regional and national. This ensures we have a core complement of officers dedicated locally to community and response policing who can then draw in specialist expertise and resources wherever and whenever they are needed. It means we have the right people in the right place at the right time to keep people safe and meet the needs of communities. Local communities and local officers get specialist support wherever and whenever they need it.

Given the changes to the overall structure of policing in Scotland and the improvements in accessibility and availability of specialist resources under the new single service, it would be inaccurate to simply compare resource information from the legacy force arrangements with the present without the context provided as part of this briefing.

Divisional Policing

For the Lothians and Scottish Borders division there are 3,156 available police officer resources. The diagram represents the availability of resources for the division.



Local police officer resources are the core complement of officers under the direction of the Local Police Commander and include community policing, response policing and divisional road policing teams. In the Lothians and Scottish Borders division, there are 913 officers delivering response and community policing.

The Divisional Road Policing Unit contains a further 40 officers taking the total local resource complement to 953.

Included in the local resource figures are officers within the Divisional Criminal Investigation Department and Public Protection Units. This includes specialised officers

Draft

West Lothian Local Policing Plan 2014-2017

attached to Divisional Rape Investigation Units, Domestic Abuse Investigation Units and Divisional Violence Reduction Units.

Local police officer resources are supplemented by specialist resources at a regional and national level, which each Local Police Commander has access to.

Regionally, there are 951 officers providing specialist support such as Major Investigation Teams and Armed Policing Units to local policing divisions within the East Command area. Nationally, there are a further 1252 resources available including specialist crime resources such as the National Rape Investigation Unit and Human Trafficking Unit and operational support resources such as Air Support and Mounted Unit.

As well as these specialist resources, the division can also request additional support to police large scale events or major incidents.

Specialist Resources

The following outlines the regional and national resources available to the division.

Regional

Specialist Crime Division: Major Investigation Teams, Forensic Gateways, E – Crime, Financial Investigations, Serious and Organised Crime Units, Counter Terrorism Units, Offender Management, Border Policing Command, Technical Support Unit and Interventions.

Operational Support: Event and Emergency Planning, VIP Planning, Armed Policing Training, Road Policing Management & Policy, Armed Policing, Dogs, Trunk Roads Policing Group and Operational Support Units.

Custody: Regional Custody Teams.

Contact, Command and Control: Area Control Rooms and Service Centres.

National

Specialist Crime Division: National Intelligence Bureau, Homicide Governance and Review, Prison Intelligence Unit, Human Trafficking Unit, National Rape Investigation, National Rape Review, Fugitive Unit and Scottish Protected Persons Unit, International Unit, HOLMES, Safer Communities Citizen Focus, Preventions and Interventions, and Strategic Partnerships.

Operational Support: Scottish Police Information and Coordination Centre, Intelligence, Specialist Operations Training, Air Support, Dive/Marine Unit, Football Co-ordination Unit, Mounted Unit, Mountain Rescue, Motorcycle Unit.

Custody: Area Command, Support.

Contact, Command and Control: Incident Management, Service Overview.

Appendix D – Strategic Policing Priorities and National Outcomes

Police Scotland's priorities are aligned from strategic level to operational delivery and underpinned by a single set of measures housed within our performance management system.

Our priorities align to the Scottish Government's Strategic Policing Priorities and National Outcomes.

Scottish Government Strategic Policing Priorities

Priority 1

Make communities safer and reduce harm by tackling and investigating crime and demonstrating pioneering approaches to prevention and collaboration at a national and local level.

Actively support a decisive shift towards prevention by promoting evidence based practice and effective partnerships to make the most of collective resource, knowledge and expertise, especially around reducing violence and reoffending, substance misuse, promoting better outcomes for young people who offend and protecting children, young people and vulnerable adults.

Priority 2

Strengthen Scotland's reputation as a successful and safe country by demonstrating excellence in effectively planning for and responding to major events and threats.

Work across national, international and organisational boundaries to ensure the Commonwealth Games and other important events are safe and secure; contribute effectively to multi agency arrangements to deal with emergencies; and minimise threats to our communities arising from extremism and serious organised crime.

Priority 3

Provide an efficient, effective service focused on protecting frontline services, delivering the benefits of police reform and promoting continuous improvement.

Deliver the three benefits of reform and work with others to ensure that the criminal justice system is fair and accessible, using science, technology and innovation to support the delivery of an effective and efficient police service.

Priority 4

Make communities stronger and improve wellbeing by increasing public confidence and reducing fear of crime, making the new Police Service of Scotland an exemplar of visible, ethical and responsive policing.

Ensure that victims, witnesses and communities experience positive engagement with the police by providing inspirational leadership and embedding a culture, identity and values

which provide a highly skilled and motivated workforce to deliver improved local services with the consent and involvement of communities

Scottish Government National Outcomes

- Outcome 5:** Our children have the best start in life and are ready to succeed.
- Outcome 7:** We have tackled the significant inequalities in Scottish society.
- Outcome 8:** We have improved the life chances for children, young people and families.
- Outcome 9:** We live our lives safe from crime, disorder and danger.
- Outcome 11:** We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- Outcome 13:** We take pride in a strong, fair and inclusive national identity.
- Outcome 16:** Our public services are high quality, continually improving, efficient and responsive to local people's needs.

Scottish Government Priorities



POLICE SCOTLAND PRIORITIES

Reduce violence, disorder and antisocial behaviour

Protect the public

Increase road safety and reduce road crime

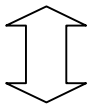
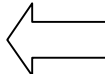
Tackle serious organised crime and terrorism

Effectively police major events and threats

Maintain high levels of public confidence in policing

Deliver our equality and diversity outcomes

**West Lothian
Local Policing
Plan**



**9 Multi Member
Ward Plans**



**West Lothian
Council**

COUNCIL EXECUTIVE

VILLAGES IMPROVEMENT FUND UPDATE

REPORT BY HEAD OF PLANNING AND ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of this report is to seek Council Executive approval on the full allocation of the village's improvement fund from 2014/15 to 2017/18, and to set out a revised proposal of the delivery and operations of the fund.

B. RECOMMENDATION

It is recommended that the Council Executive:

1. agrees to the continuation of the fund and split over the eligible areas; and
2. agrees to the differing delivery role i.e. community led or council led depending on each areas needs and requirements.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs Making best use of our resources; and Working in partnership
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	To be assessed on an individual project basis but it is not anticipated that any proposals will require to be the subject of specific assessments.
III Implications for Scheme of Delegations to Officers	Responsibility for the fund is already delegated to the Head of Planning and Economic Development. This report does not propose any changes to delegations.
IV Impact on performance and performance Indicators	None.
V Relevance to Single Outcome Agreement	Outcome 3 Our Economy is diverse and dynamic and West Lothian is an attractive place to do business.
VI Resources - (Financial, Staffing and Property)	A total of £1.645m is available in the General Services Capital Fund in the period to 2017/18.

VII Consideration at PDSP

The matter was considered at the D&T PDSP on 2 April 2014. The panel supported the proposals.

VIII Other consultations

Finance, Operational Services, Area Services.

D. TERMS OF REPORT

At the Council Executive in May 2013 there was an agreement to a one year allocation of funding to establish the Villages Improvement Fund. This was a total of £490,000 (£430,000 for Improvements and £60,000 for shop front) leaving a balance of £1.155m to be allocated from 2014/15 to 2017/18.

Scale of Awards

With 27 eligible communities identified previously, it is proposed to split the remaining funds as follows:-

£90,000 each for the top 5 villages per population

£40,000 each for the middle 15 villages

£15,000 each for the villages with less than 500 populations.

The above totals will be added to any under spend brought forward from 2013/14.

Criteria

There is no proposal to change the criteria or administration from last year's report, however it is important to highlight that there has been some concerns raised about the capability of local organisations to incur capital expenditure within their area.

At present the local community regeneration officers are working with some of the communities to work up projects and to ensure that any match funding or revenue to support the projects on an on-going basis are in place.

Projects are being progressed through this route and a number of projects are now waiting for the approval for additional capital allocations to be realised.

In addition many of the organisations who are struggling with the project management are looking to secure the projects via the Council as a result some project expenditure against communities will be incurred directly by the Council.

In order to keep control of the expenditure and to ensure effective liaison across the different service areas involved with projects, it is proposed to use existing officer resource within Economic Development to support and coordinate the projects and act as liaison between:

- Community Regeneration officers
- The local communities
- Other council services e.g. planning and operational service.

Reports will continue to be ratified by the relevant local area committee.

There is no change to the shop front improvement scheme previously agreed by the Council Executive in May 2013.

E. CONCLUSION

To deliver a successful village improvement fund the report recommends the remaining allocation of the funds to be split as per the report and appendix 1. The approval of the differing delivery role depending on each area's needs and requirements, will make it easier for communities to benefit from the funding.

F. BACKGROUND REFERENCES

None.

Appendices/Attachments: Appendix 1 : List of eligible communities

Contact Person: Alice Sinnet, Economic Development Manager, alice.sinnet@westlothian.gov.uk, 01506 283079

Craig McCorriston
Head of Planning and Economic Development

Date of meeting: 15 April 2014

Appendix 1 - Localities in order of size (as defined by Records Scotland Census team)

	Revised 2011 Populat ion	Multi Member Ward	Full Capital Allocation to 2017/18
Villages with more than 500 residents			
Blackburn (West Lothian)	5,338	Whitburn & Blackburn	90,000
Fauldhouse	4,843	Fauldhouse & Breich Valley	90,000
East Calder	4,779	East Livingston & East Calder	90,000
Mid Calder	3,418	East Livingston & East Calder	90,000
West Calder	3,164	Fauldhouse & Breich Valley	90,000
Winchburgh	2,490	Broxburn, Uphall & Winchburgh	40,000
Polbeth	2,341	Fauldhouse & Breich Valley	40,000
Stoneyburn / Bents	2,021	Fauldhouse & Breich Valley	40,000
Blackridge	1,953	Armadale & Blackridge	40,000
Kirknewton	1,933	East Livingston & East Calder	40,000
Uphall Station	1,872	East Livingston & East Calder	40,000
Addiebrownhill / Loganlea	1,504	Fauldhouse & Breich Valley	40,000
Seafield	1,380	Whitburn & Blackburn	40,000
Pumpherstoun	1,308	East Livingston & East Calder	40,000
East Whitburn	1,221	Whitburn & Blackburn	40,000
Greenrigg	1,042	Whitburn & Blackburn	40,000
Longridge	903	Fauldhouse & Breich Valley	40,000
Bridgend	772	Linlithgow	40,000
Dechmont	706	Broxburn, Uphall & Winchburgh	40,000
Torphichen	575	Armadale & Blackridge	40,000
Villages with less than 500 residents			
Westfield	419	Armadale & Blackridge	15,000
Breich	398	Fauldhouse & Breich Valley	15,000
Philpstoun	394	Linlithgow	15,000
Ecclesmachan / Oatridge	349	Broxburn, Uphall & Winchburgh	15,000
Newton / Woodend	175	Linlithgow	15,000

Threemiletown	162	Linlithgow	15,000
Wilkieston	151	East Livingston & East Calder	15,000

Source: 2011 Census Locality, Datazone and Census Output Area (COA) population figures	1155000
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Previous Allocation	430000
Shop front	60000
Total Allocation	1645000



West Lothian
Council

COUNCIL EXECUTIVE

SESPLAN SUPPLEMENTARY GUIDANCE FOR HOUSING

REPORT BY HEAD OF PLANNING AND ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of this report is to advise the Council Executive on progress with the preparation of Supplementary Guidance on Housing as required by the Scottish Ministers in approving the Strategic Development Plan and to seek ratification of the decision of the SESplan Joint Committee to submit the Supplementary Guidance to Scottish Ministers for approval.

B. RECOMMENDATION

It is recommended that the Council Executive:

1. notes the summaries of the consultation responses to the Draft Supplementary Guidance and the SESplan responses as set out in Appendices A and B;
2. notes the findings of the updated Strategic Environmental Assessment Environmental Report;
3. notes the findings of the Draft Habitat's Regulations Assessment record;
4. supports the minor editorial changes to the Supplementary Guidance and Technical Note approved by SESplan Joint Committee on 10 March 2014 and as set out in Appendix C;
5. supports the SESplan Joint Committee decision to submit the Supplementary Guidance to Scottish Ministers for approval as set out in Appendix D; and
6. supports adoption of the Supplementary Guidance on Housing, subject to there being no direction not to adopt by the Scottish Ministers.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; being honest, open and accountable; making best use of our resources; and working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	The Strategic Development Plan has been the subject of Strategic Environmental Assessment and is supported by an Equalities Impact Assessment.
III Implications for Scheme of Delegations to Officers	None.
IV Impact on performance and	Preparation of strategic development plans

performance Indicators	(SDPs) and local development plans (LDPs) are statutory requirements. Progress with the preparation of the SDP and LDP are monitored by Scottish Government as a performance indicator for local authorities.
V Relevance to Single Outcome Agreement	<p>Outcome 3 - Our economy is diverse and dynamic and West Lothian is an attractive place for doing business.</p> <p>Outcome 8 - We make the most efficient and effective use of resources by minimising our impact on the built and natural environment.</p>
VI Resources - (Financial, Staffing and Property)	<p>Progressing the Supplementary Guidance to approval does not, itself, have any unplanned resource implications for the council.</p> <p>Bringing forward the requirements of the supplementary guidance could have significant infrastructure implications for the council. The implications cannot be fully assessed until such time as the requirements are translated into site specific allocations in the forthcoming local development plan.</p>
VII Consideration at PDSP	The SESplan Supplementary Guidance was considered by the Development & Transport PDSP on 3 April 2014 with a recommendation that the report be forwarded to the Council Executive for approval.
VIII Other consultations	The council's Head of Finance and Estates was consulted in the preparation of this report.

D. TERMS OF REPORT

D1 BACKGROUND

The SESplan Joint Committee (JC) comprises representatives from City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian Councils. The Joint committee met on 10 March 2014. Reports considered by the JC related to:

- SESplan Supplementary Guidance for Housing Land;
- Development Plan Scheme No.6; and
- Finance.

All papers can be accessed on the SESplan web site at http://www.sesplan.gov.uk/about/jc_reports.html A Minute of the Joint Committee will be published in due course.

D2 Matters Arising from Joint Committee

Supplementary Guidance for Housing Land - Background

The SESplan Strategic Development Plan (SDP) was approved by Scottish Ministers with modifications on 27 June 2013. In approving the SDP, Scottish Ministers required that SESplan prepare supplementary guidance on housing which would provide detailed information for LDPs as to how much of the overall SESplan housing land requirement should be met in each of the six member authority areas for the period 2009 - 2024. Policy 5 of the SDP refers.

As set out in the SDP approval letter, Scottish Ministers expect the Supplementary Guidance to be adopted within 12 months from the date of approval of the SDP. The guidance must, therefore, be adopted by no later than the 27 June 2014. The approval letter can be viewed at <http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=qA313854>

Draft supplementary guidance in support of the approved Strategic Development Plan (SDP) was published by SESplan on 12 November 2013. The consultation period ended on 23 December 2013 resulting in a total of 167 submissions being received. The consultation responses received are contained in Appendices A and B and can also be viewed in full at <http://sesplan-consult.objective.co.uk/portal/sg/hsgland> A summary of the consultation responses and the SESplan proposed response can be found at [http://www.sesplan.gov.uk/assets/files/docs/100314/Item%20%20-%20Supplementary%20Guidance\(1\).pdf](http://www.sesplan.gov.uk/assets/files/docs/100314/Item%20%20-%20Supplementary%20Guidance(1).pdf)

Consultation Responses

Consultation on the draft supplementary guidance was undertaken with a wide range of consultees including key agencies (SEPA, Scottish Water, Historic Scotland and SNH), community councils, developers, landowners and individuals across the SESplan area. Comments received related to the scale of housing land proposed through the draft supplementary guidance and the distribution of this across the SESplan area.

The majority of responses related to the City of Edinburgh Council administrative area. In addition, key issues raised related to delivery of the proposed level of housing and that it is the current economic climate which is preventing housing delivery; protection of the green belt; and the development strategy where it was considered that no justification had been given to explain the distribution of the housing land requirement.

In response, SESplan has advised that housing completion levels across the SESplan area will require to be increased and this presents a considerable challenge for SDPs and LDPs. To achieve this, SESplan together with the member authorities will continue to work with the development industry, key agencies and the Scottish Government to increase housing delivery rates. The Council Executive is advised that whilst housing completion rates in West Lothian are showing an upward trend a substantial increase in build rates upon current levels will be required to meet SESplan requirements to the area.

In relation to the green belt, SESplan acknowledge that some release of greenfield land will be required to accommodate development.

Policy 7 sets a criteria based approach to the consideration of planning proposals for housing on greenfield sites to maintain a five years' effective supply of housing land.

These require that:

- a) The development will be in keeping with the character of the settlement and local area;
- b) The development will not undermine green belt objectives; and
- c) Any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

In relation to the development strategy, SESplan has advised that the distribution of the housing land requirement is based upon full consideration of infrastructure and environmental constraints across the SESplan area, as set out in the Technical Note prepared alongside the draft supplementary guidance. However, SESplan propose that to provide greater clarity in the supplementary guidance to be submitted to Scottish Ministers for approval, the guidance will be revised to provide that clarity.

Next Steps

SESplan does not propose any change to the scale of housing land proposed or the distribution across the SESplan area. What this means for West Lothian is that of the total SESplan housing requirement of 107,560 units over the period 2009-2024, West Lothian's contribution would require completions of 18,010 units to be achieved in addition to an additional allowance of 2,130 units over the period to assist in meeting the overall SESplan housing land requirement. Of the completions required, 1,825 have already been delivered over the period 2009-2013 with a further 550 completions expected over the financial year to 31 March 2014.

In addition, the SESplan Joint Committee has agreed editorial changes to the supplementary guidance. These include an explanation of how the housing land need that arises in Edinburgh will be met; clarifying the role and justification for identifying land for development outwith the Strategic Development Areas identified in the SDP approved plan; and editorial changes to the Technical Note to the draft supplementary guidance to clarify the methodology undertaken and that the approved supplementary guidance must accord with the approved spatial strategy set out in the approved SDP. The full terms of the proposed amendments to the supplementary guidance are set out in Appendix C. The proposed amended supplementary guidance for submission to Scottish Ministers is attached as Appendix D.

Supporting Documents – Strategic Environmental Assessment and Habitats Regulations Appraisal

The supplementary guidance is supported by a Strategic Environmental Assessment and a Habitats Regulations Appraisal which were the subject of consultation alongside the draft supplementary guidance. The Environmental Report assessed the potential impact of the implementation of the housing land requirements and additional allowances on environmental objectives set out in the SEA prepared in support of the SDP. Further work will be required to the SEA once the supplementary guidance is adopted. The HRA indicates that further assessment will be required at LDP level of any likely significant effects of development on European Protected Sites of nature conservation and habitats.

Once approved, the supplementary guidance will set the housing land requirement for each of the SESplan member authorities. SESplan is required to submit the guidance to Scottish Ministers for approval. Scottish Ministers have 28 days in which to approve to approve the guidance.

D3 Other Matters Considered by the Joint Committee

Development Plan Scheme No.6 (DPSNo.6)

DPSNo.6 provides an updated timetable for preparation of SDP2. The Main issues Report (MIR) for SDP2 is now anticipated for publication in autumn/winter 2014 with publication of the proposed plan anticipated in spring 2016. Future iterations of the West Lothian LDP will require to conform with the terms of SDP2. The Council Executive is asked to note this timetable. A copy of the DPS can be accessed at <http://www.sesplan.gov.uk/assets/files/docs/100314/Item%207%20-%20Joint%20Cee%20Report%20Development%20Plan%20Scheme%206.pdf>

Finance

The Joint Committee approved a finance report advising that subject to re-location of the SESplan core team, SESplan is to make a 5% savings reduction in revenue expenditure for financial year 2014/15 and this money (£2,829 per member authority) will be refunded by 30 June 2014.

E. CONCLUSION

In approving the SDP, Scottish Ministers required the preparation of supplementary guidance for housing. Draft supplementary guidance has been the subject of consultation with relevant parties and consultation responses received have been assessed and responded to by SESplan. Non-substantive changes are proposed to the guidance as a result of the consultation comments received. The guidance, once approved, will set the housing land requirements for LDPs.

F. BACKGROUND REFERENCES

Report to Development and Transport Policy Development and Scrutiny Panel (PDSP), 3 April 2014: SESplan Supplementary Guidance for Housing.

Report to Development and Transport Policy Development and Scrutiny Panel (PDSP), 20 February 2014: SESplan Update, Budget Ratification and Update on Consultation on Supplementary Guidance for Housing.

Report to Development and Transport Policy Development and Scrutiny Panel (PDSP), 13 June 2013: Strategic Development Plan Update.

Report to Development and Transport Policy Development and Scrutiny Panel (PDSP), 18 April 2013: SESplan Update and Budget Ratification.

Report to Council Executive, 29 October 2013: SESplan Supplementary Guidance For Housing.

Appendices/Attachments: Four

Appendix A: Summary of Consultation Responses received to SESplan Supplementary Guidance on Housing

Appendix B: SESplan Proposed Response to Consultation Responses received to SESplan Supplementary Guidance on Housing

Appendix C: SESplan Proposed Amendments to Supplementary Guidance on Housing

Appendix D: SESplan Supplementary Guidance for submission to Scottish Ministers

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Craig McCorriston
Head of Planning and Economic Development

15 April 2014

APPENDIX A Summaries of Consultation Responses Received on the draft
Supplementary Guidance on Housing Land

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Response ID	Respondee	Summary
Question 1 - Do you agree that the Supplementary Guidance complies with Scottish Planning Policy? If not, why not? In what way does the Guidance need to change in order to comply with Scottish Planning Policy?		
11	Regenco	Cannot identify constrained sites for development in plan period; The Waterfront is not a marketable or deliverable location for such development; Require allowance for flexibility in table 3.1; Winchburgh is a highly sustainable location.
12	Alfred Stewart Properties	Concern over delivery in Dunfermline
26	Liberton CC	Role of SDPA to confirm
43	SNH	No comment
50	Dr Tom Slater	No. Is not sustainable and supports development industry and landowners interests only.
57	Mr Scott Mackenzie	Yes
63	Gladman	Yes. Sets out distribution of housing requirement.
73	SEPA	Flood risk should be given more consideration with a Strategic Flood Risk Assessment being produced alongside the Supplementary Guidance.
78	SEPA	Blank
82	Musselburgh Conservation Society	Cannot be specific
92	Roslin & Bilston Community Council	More though needs to be given to meeting transport needs to new development in Midlothian. Current plans seem insufficient.
95	Cllr Dave Dempsey	Does not comply with public interest
103	Mr Grant McCulloch	Should wait until SPP review is complete
112	Murieston Community Council	Yes
122	Miss Carolyn Campbell	Cannot answer as review not complete
128	Mr Alan Harrison	Questions need for houses.
129	Banks Group	Welcomed compared to Proposed Plan
161	McTaggart & Mickel Homes	No. Housing demand not met where arising.
170	Scottish Government	Yes, subject to transport infrastructure concerns being met
177	Mansell Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
183	TMS Planning Services	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
189	Campion Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
195	Muir Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
208	Airthrie Estates	Does not comply with SPP as it does not link development to expected infrastructure delivery; additional housing is not directed to successful areas, such as West Lothian; West Lothian additional allowances are based on past movements trends and do not reflect opportunities to create sustainable new settlements.

Response ID	Respondee	Summary
215	Strawson Property	There is no explanation about the extent to which demand has been met. The SG does not explain openly and transparently how the distribution of Additional Allowances has been arrived at. The East Lothian additional allowance figure is arbitrary.
229	Grange and Prestonfield Community Council	Yes. SPP should allow for realistic SDPs.
232	Cockburn Association	Question the reliability of using projections. Welcome that Edinburgh constraints are recognised and that some demand can be met in
240	Mrs Linda Allison	Yes
242	Kalewater Community Council	Yes
249	Mrs Carol Smith	Requirement for 107,545 dwellings is not justified or based on robust data.
252	Haddington and District Amenity Society	Issues around capacity, design and deliverability
260	Barratt and David Wilson Homes	Guidance reflects the spatial strategy, SDP policy 5, and accords with SPP
268	Savills	Accords with SPP. Should require presumption in favour of sustainable development.
273	Dr David Mallon	What account has been taken of Fife Coastal Plan? Villages should be protected from development. Aberdour would not cope with increased traffic associated with development.
278	Dr David Mallon	duplicate of 273
281	Dr David Mallon	duplicate of 281
290	Mr Jon Grounsell	No. Process is driven by landowners and developers determining what is effective.
293	Balerno Community Council	Targets are unrealistic and will lead to development in protected Green Belt. Need to factor climate change and protecting agricultural land.
301	Trustees of the Foxhall Trust	Too much reliance on committed sites which are not effective and are not delivering completions. There should be a generous supply of new land.
307	EDI Brunstane	Scope to improve the SG references to SPP guidance on housing land and green belt
314	Straiton Parks Ltd.	Fails to consider deliverability of sites.
326	Mrs Ruth Schofield	Unrealistic targets will lead to development of unsuitable land.
339	Mrs Christine Shaw	Wait until SPP review is complete.
344	Mrs Gertrud Mallon	No. SG is contradictory to aims of SPP.
350	Mrs Maggie Pithie	Number of houses not justified. Alternative site status changed without notification or justification. Cammo NOT West Edinburgh. No regard for infrastructure or traffic issues. Massive negative impact on education provision. Plenty of brownfield sites available before this green belt site is stolen. Catastrophic impact on rare species.
351	Mrs Anna Purdie	No. SG is contradictory to aims of SPP.
363	Ogilvie Homes	Does not set out what the spatial strategy is. Does not seek to meet demand where it arises. fails to provide a reasoned and informed justification for the range of environmental and infrastructure constraints which are set out as the basis for the proposed geographical dispersal of the identified housing requirement.
369	Ashdale Land & Property	Does not set out what the spatial strategy is. Does not seek to meet demand where it arises. fails to provide a reasoned and informed justification for the range of environmental and infrastructure constraints which are set out as the basis for the proposed geographical dispersal of the identified housing requirement.
377	Mrs Elaine Hutchison	Unrealistic targets will lead to development of unsuitable land and won't align with sustainable development. SG must meet aims of Strategic Development Plan. Weight should be given to food production and protecting agricultural land.

Response ID	Respondee	Summary
383	Mrs Caitlin Hamlitt	Large housing requirement will require development in unsustainable locations. Pressure on councils to permit greenfield development. SG must meet aims of Strategic Development Plan. Weight should be given to food production and protecting agricultural land.
384	Mr Patrick Mitchell	No documentary train behind housing need
396	Mrs Angela Leask	Fails to take account of infrastructure in Coastal Fife, particularly Aberdour. Impact on already high traffic levels and amenity.
397	Mrs Angela Leask	Duplicate of 396
402	Mr Jon Watkins	Opposed to high housing requirement and development at Cammo. Green Belt should be protected. Cammo area infrastructure is over capacity. There are sufficient brownfield sites, the development of which should be subsidised.
413	Juniper Green Community Council	SPP is not clear on what a generous supply is.
425	Mr Paul Morris	Balerno is not suitable for large scale development due to infrastructure capacity issues. For Edinburgh, the area is poorly accessible and lack employment opportunities. Loss of green belt benefits including productive agricultural land. SG must meet the objectives of the SDP.
427	HPG Dalkeith	The SPG has relied on an update of the HNDA (Housing Need and Demand Audit), an analysis of the wider housing market and sub markets in terms of maintaining a 5 year land supply and an updated 'refresh' of the spatial strategy assessment. It is not considered that these matters have been sufficiently assessed nor are the outcomes adequately transparent in terms of their sustainable economic development rationale or consistency with underlying planning objectives. A lack of vision and ambition in relation to promoting economic recovery and aligning land finance and delivery across the SESplan area. It will not provide the basis for a maintenance of a 5 year supply of land at all times; The allocations proposed across the SESplan area and within South - East Edinburgh will not meet the principal aims and objectives of the SDP; The environmental constraints identified within the SDP are exaggerated and does not relate to the technical information or the policies within the SDP; Development economics within South East Edinburgh requires additional investment in order to provide essential infrastructure; Over-reliance on existing committed land which continues to fail to deliver; and Promoting Cauldcoats farm.
438	Mr James Poseley	Contradiction between brownfield priority and level of green belt development, including West Edinburgh.
440	Mr Blair Melville	Guidance now sets out a housing requirement based on a Housing Needs and Demand Assessment and shows this by Council/Local Development Plan area and by Strategic Plan time periods, all as required by SPP. It does not: seek to meet demand in the areas where it arises; set out alternatives or justify the preferred strategy; consider deliverability; ;set out a clear justification of the alleged environmental and infrastructure constraints; and set out a long-term spatial strategy. The spatial strategy and its implications are not clear.
449	IBG Stakeholders	There is too much reliance on committed sites and a broad based assumption of 83,207 dwellings being easily accommodated and built out. SPP warns against an over - reliance on committed sites when calculating the housing land requirement. This potentially compromises the SPP requirement to provide a generous housing land supply.
452	Banks Group	The SG fails to explain why only 100 of the 14,188 additional allowance required in excess of the Proposed Plan are capable of being accommodated in Midlothian.
455	Firrhill Community Council	Previous lower requirements are not being met, therefore are these achievable? Question the effective land supply process and developers/landowners role in it.
469	Miller Homes East Scotland	SG reflects a more compliant position with SPP. However, only if the distribution of new housing allocations creates opportunities for development in the right locations (marketable/accessible/sustainable) will SESplan and this SG be able to give clarity and confidence to the house building industry for committing to sites which will ensure delivery of housing units on the ground.
479	Mrs Blyth Peart	No comment

Response ID	Respondee	Summary
481	Strutt & Parker	Does not seek to meet need and demand in the areas that it arises, nor does it properly justify not meeting need and demand in the area it arises.
488	Dr Caroline Ritchie	Setting a target to build so many houses creates a tension between different aspects of that policy. Policies to promote sustainability and to protect agricultural and Green belt land are set against the reality that if the current fiscal climate persists, achieving the targets set will be highly dependent upon the involvement of the private sector. As their main concern is financial return for their shareholders rather than the best interests of the wider community, private companies engaged in housing development favour the use of greenfield sites in locations that will generate the most profit from their development. This frequently results in the building of houses which are not of the type that is most needed in locations which do not meet Scottish Government guidance on sustainability and are not the areas where housing is required. The Supplementary Guidance will put councils, in particular those who do not currently have the resources to subsidise the building of social and affordable housing, in the position where they are pressurised into consenting to planning applications in locations which are contrary to their own policies, in particular on high quality agricultural and Green belt land.
495	Persimmon Homes East Scotland	Partly by basing requirement on need and breaking down by LDP area. The strategy is not ambitious or succinct. More guidance should be given for the locations of allowances outside the SDAs. The justification of the strategy and the housing allowances is not clear. The SG should provide a generous supply, not a sufficient one. Deliverability has not been consider by locating development in areas where there is insufficient demand.
506	Stewart Milne Homes	In part by setting out a requirement by LDP area. But it does not: 1. seek to meet demand in the areas where it arises; 2. set out alternatives or justify the preferred strategy; 3. consider deliverability; 4. set out a clear justification of the alleged environmental and infrastructure constraints; and 5. set out a long-term spatial strategy. The strategy is not explicit and it does not set out the implications of not meeting demand where it arises.
513	Aberdour Community Council	No comment
517	Wallace Land Investment & Management	It provides no evidence of environmental and infrastructure constraints to justify why housing need and demand in the City cannot be met in full. The housing land requirement for each local development plan fails to take into account known market trends in redistributing households from City of Edinburgh to the neighbouring local authority areas. The Strategic Development Planning Authority (SDPA) has not sought to engage in partnership working with the house building sector to validate its conclusions. The SDPA must demonstrate that the proposed development strategy at the regional scale is sustainable and does not result in more commuting back to Edinburgh. The use of constrained land in the land supply calculations is contrary to SPP and SDP Policy 5. The use of additional allowances for 2019 to 2024 is contrary to SPP. The housing requirements should be modified to only allow a distribution of 19% of Edinburgh's need to other authorities. This is based on past market trends. Given the lack of compliance with SESplan SDP and SPP, it is requested that a Hearing is held to resolve the outstanding matters.
527	Hallam Land Management	It provides no evidence of environmental and infrastructure constraints to justify why housing need and demand in the City cannot be met in full. The housing land requirement for each local development plan fails to take into account known market trends in redistributing households from City of Edinburgh to the neighbouring local authority areas. It is not explained why Midlothian is the biggest receiver of redistribution from Edinburgh. The Strategic Development Planning Authority (SDPA) has not sought to engage in partnership working with the house building sector to validate its conclusions. The SDPA must demonstrate that the proposed development strategy at the regional scale is sustainable and does not result in more commuting back to Edinburgh. The use of constrained land in the land supply calculations is contrary to SPP and SDP Policy 5. The use of additional allowances for 2019 to 2024 is contrary to SPP. The housing requirements should be modified to only allow a distribution of 19% of Edinburgh's need to other authorities. This is based on past market trends. Given the lack of compliance with SESplan SDP and SPP, it is requested that a Hearing is held to resolve the outstanding matters.

Response ID	Respondee	Summary
529	Murray Estates	It does not meeting the requirements of SPP. Housing demand is not met where it arises. It does not meet sustainable growth objectives by requiring longer journeys between new homes a and jobs in Edinburgh. Disagree that the Edinburgh Green Belt should justify the redistribution of housing away from Edinburgh. It does not explain why Edinburgh, and specifically West Edinburgh, cannot accommodate more housing, and the sense is that the HoNDA redistribution has arisen from political expediency rather than a genuine attempt to strategically plan the City Region. Should not assume that constrained sites will contribute toward meeting need.
540	Taylor Wimpey	It does not meeting the requirements of SPP. Housing demand is not met where it arises. It does not meet sustainable growth objectives by requiring longer journeys between new homes and jobs in Edinburgh. Disagree that the Edinburgh Green Belt should justify the redistribution of housing away from Edinburgh as this will not lead to a sustainable settlement pattern. Should not assume that constrained sites will contribute toward meeting need.
547	Scottish Property Federation	The Supplementary Guidance reaffirms previous policy on housing allocations largely. Certain of the assumptions made in the Supplementary Guidance remain too optimistic in certain areas or are based upon notions of new housing completions that are unlikely to be achieved. This includes Edinburgh Waterfront.
550	Ashfield Commercial Properties LTD	Set out a summary of the examination. It is crucial that this SG is interpreted at the local level and that officers (and their Council members) do not maintain the status quo of simply relying on allocated sites/ commitments which are undeliverable in their current form.
565	Mr Morrison	Object to development of Green Belt land at Cammo and subsequent impact on traffic and transport infrastructure.
573	Mrs Christine Briffitt	No. The Supplementary Guidance directly contradicts many of the aims set out by Scottish Planning Policy by dictating the numbers they have to achieve despite incomplete or outdated reports and vague assessments
576	Mr Archibald Clark	No comment
583	Health & Safety Executive	Consultation not related to development near hazardous installations.
587	Cadzow Estate	No. Insufficient account has been taken of issues relating to the deliverability of a proportion of the existing sites and the real volume of current demand. The guidance is not fully compliant with SPP and does not provide a generous amount of housing land for building purposes. It will not provide the basis for a maintenance of a 5 year supply of land at all times. The allocations proposed across the SESplan area and within West Lothian will not meet the principal aims and objectives of the SDP. There is an over-reliance on existing committed land which has and continues to fail to deliver thereby reducing development potential. Not enough consideration has been given housing potential in West Lothian.
Question 2 - Do you agree that the distribution of the housing land requirement across each of the six Member Authority areas set out in Table 3.1 is justified? Do you have any further comments on the distribution of the housing land requirement set out in Table 3.1 of the Supplementary Guidance?		
13	Alfred Stewart Properties Ltd	Does not agree with Table 3.1. The Supplementary Guidance asserts there is a committed supply of 83,207. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
19	Regenco (Trading) Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.

Response ID	Respondee	Summary
27	Liberton and District Community Council (Mr Jim Henry)	Agree with Table 3.1. The allocations made are consistent with the numbers in the Scottish Ministers' Approval Letter for the period 2009 and 2024. Liberton and District Community Council agrees that there is justification for this allocation.
32	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.1. West Lothian is a small county and we as a community council think 11,420 new houses are too much. Craigshill is full up. We should be looking to protect agricultural land.
35	Milesmark and Baldrige Community Council (Mr Alex McLaren)	Does not agree with Table 3.1. Fife is already experiencing significant development and it appears that the plan from 2019 continues that trend. Scottish Borders appears to be under distributed, especially with the new rail link. This plan would ease traffic congestion, which is already significant into Edinburgh from Fife. East Lothian also appears to have capacity to take more of the share and is closely situated to Edinburgh, where most people in the area will take up employment.
40	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.1. SNH cannot comment on housing need and demand. However, meeting the housing land requirement is likely to impact on a number of natural heritage interests, including soils, habitats, species and landscape. Strategic consideration of natural heritage issues associated with the housing land requirement may help to avoid or mitigate some natural heritage impacts. Realising the opportunities for the natural heritage to be enhanced through provision of multi-functional green infrastructure that connects people and wildlife should also be identified within LDPs.
51	Dr Tom Slater	Does not agree with Table 3.1. There are enough empty homes in the City of Edinburgh to address the housing shortage. East Lothian is a rural county that will become urbanised. Prime arable land (some of the best in Scotland) should be protected. There are enough empty homes in Fife, Midlothian, Scottish Borders and West Lothian to address the housing shortage.
58	Mr Scott Mackenzie	Agree with Table 3.1.
65	Gladman Developments (Simon Dean)	Agree with Table 3.1. The distribution identified in Table 3.1 is justified as it takes into account the identified need across the SESplan area within the plan period, and seeks to allocate it across areas where it can be delivered. However, adjustments to the overall distribution should not be made on the basis of specific-site assessments carried out by local authorities.
74	SEPA (Mr Paul Lewis)	SEPA cannot answer this question confidently until an SFRA is completed and the distribution of housing land identified in Table 3.1 tested against it.
83	Mr Pau Sales	Does not agree with Table 3.1. The text relating to East Lothian includes comments that the coastal strip will not be suitable for much of the allocation. The coastal strip has the most effective and faster public transport links. The inland areas are poorly serviced and there are no proposals published that show how this will be addressed and improved.
84	Musselburgh Conservation Society (Mr Barry Turner)	Agree with Table 3.1. The distribution is justified only subject to the following provisos. Suitable Green belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability. Green belt must be protected where it serves a particular purpose. There must be recognition of capacity constraints relating to existing communities and their services and to town centres. There must be avoidance of conglomerations of development. Such unacceptable concentrations could well be possible around Wallyford, Tranent, Prestonpans and Longniddry in East Lothian. Rail transport improvements must be delivered in East Lothian to include more peak hour trains, a half hourly off peak service, a new station at East Linton and cross-Edinburgh peak hour trains. There should be a greater allocation to the eastern Borders area associated with a new station at or near Reston and an appropriate level of service to it by stopping trains between Edinburgh and Berwick. More jobs must be provided. There must be grade separation at Sheriffhall junction and improvements at the Old Craighall junction.
93	Roslin and Bilston Community Council (Margaret Littlewood)	Does not agree with Table 3.1. This is too heavy a burden for Midlothian. not only because of the transport problems but because much of the land is either marshy or undermined with coal or mine workings or sand or gravel pits. In particular the large number of houses allocated to Bilston in BN1 is inappropriate. Bilston itself has virtually no infrastructure and could not readily be geographically linked with the housing in question.

Response ID	Respondee	Summary
97	Cllr Dave Dempsey	Does not agree with Table 3.1. The figure for Fife has been artificially inflated on two counts. First, the GROS estimates of population growth, are not in line with reality. Second, the figure for Fife would have been lower if Edinburgh could have found the sites needed to meet its housing needs. It would be better to leave the excess as "tbd" and allow time for a better estimation of the true situation.
104	Mr Grant McCulloch	Does not agree with Table 3.1. There is already considerable land approved for development. The rate of development currently seen in Edinburgh (at about 900 completions pa) indicates that there is no demand either from purchasers or from developers. By creating an opportunity, such as green belt sites in West Edinburgh, developers will cherry pick sites over those which have been approved. There is no evidence to suggest that 29,500 houses are needed in Edinburgh. Nothing has changed in the social or economic situation since the MIR to justify these figures. There was no reason to include the Cammo fields in the West Edinburgh. It has no access to the tram, it is in transport poverty already, and has to contend with a transport infrastructure that barely works.
113	Murieston Community Council (Mr Davidson McQuarrie)	Does not agree with Table 3.1. The distribution of housing land requirement is disproportionately high for West Lothian set against City of Edinburgh, Midlothian and East Lothian. For example, it is anomalous that East Lothian has a much lower allocation of land requirement than Midlothian despite having a larger population. The need and demand for housing is predominately created by City of Edinburgh and should be delivered there. Meeting the demand from within City of Edinburgh would reduce the pressure on the existing transport structure. The City of Edinburgh should maximise the use of brownfield sites and greenfield within the City. Priority should be given to brownfield sites within existing built up areas.
119	Mrs Sally Chalmers	Does not agree with Table 3.1. There is plenty of land already allocated for development in Edinburgh which is still not being built on. Developers should be required and incentivised, if necessary, to build on the sites they already have. The green belt should be untouched.
123	Miss Carolyn Campbell	Does not agree with Table 3.1. The main focus for development in Edinburgh appears to be in the West and South East. Why? It is stated that brownfield sites should be used first, Cammo is Green Belt and why has it been upgraded from an "alternative" site?
130	Banks Group (Mr Alistair Landells)	Does not agree with Table 3.1. Slightly loaded against Midlothian and West Lothian.
139	Mr Alan Harrison	Does not agree with Table 3.1. Combining the West Edinburgh and Fife totals, the Forth bridge and roads into the city could not take the extra vehicles. It might be necessary to introduce big tolls on the bridges to make people use park and ride. Cammo estate was not a preferred site why is it being pushed forward?
145	Dr Simon Jackson	Does not agree with Table 3.1. There are plenty of unfinished developments suggesting that locally there is not the demand for housing.
162	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.1. The City of Edinburgh still has not accepted its share of housing demand, requiring surrounding Local Authorities to accept more development than is necessary, which is not a sustainable approach to delivering housing need. Edinburgh Council should plan for at least 5,000 houses across the plan period. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
168	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.1. The City of Edinburgh Council area should accept more housing development over the plan period. Housing demand arises in the City of Edinburgh and therefore the most sustainable approach to delivering the required housing numbers is to provide more housing in this area than in the surrounding local authority areas. At least 5,000 additional houses should be provided for in the Edinburgh Council area over the plan period rather than in surrounding areas. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
171	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.1, subject to the responses to questions 5 and 6 (Responses 174 and 175).

Response ID	Respondee	Summary
178	Mansell Homes	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level.
184	TMS Planning Services	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level. The principle of the re-distribution of the land requirements between LDP areas appears sound albeit it is considered that a greater proportion of the allocation should be directed towards Fife and East Lothian LDP areas with related reductions in Midlothian and Scottish Borders.
190	Campion Homes	Does not agree with Table 3.1, the title of which is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. These are 2 entirely separate figures. The land requirement should be 20% or more higher in order to provide a generous and effective land supply. It is unclear where the value of redistributing housing numbers to the Scottish Borders lies. A greater proportion should be directed towards the Fife LDP area with related reductions in Midlothian and Scottish Borders.
196	Muir Homes	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level. The principle of the re-distribution of the land requirements between LDP areas appears sound albeit it is considered that a greater proportion of the allocation should be directed towards Fife and East Lothian LDP areas with related reductions in Midlothian and Scottish Borders.
201	Mr Peter Scott	Does not agree with Table 3.1. The allocation of 2,700 additional houses in the West Edinburgh SDA should be removed or substantially reduced, due to the potential impacts on traffic in West Edinburgh and constraints on the capacities of primary and secondary schools. Traffic issues resulting from housing allocations in parts of West Edinburgh SDA to the west of Maybury Road are not adequately identified or assessed and the SDP 'Action Programme' does not include adequate proposals to mitigate the effects of traffic generated by new housing in this area.
204	Mr Stuart Sinclair	Does not agree with Table 3.1 and particularly the figures for Edinburgh.
209	Aithrie Estates	Does not agree with Table 3.1. The distribution has not been justified. It is not accepted that there are infrastructure constraints, schools in particular, in West Lothian sufficient to downgrade its relative importance in the SESplan area. Infrastructure is being provided in the Winchburgh area both by central government and by the private sector. The Forth Replacement Crossing, junction 1a on the M9, the imminent opening of Edinburgh Tram, the proximity and ongoing development of Edinburgh Airport, the Edinburgh to Glasgow Improvement Scheme, the opening of Airdrie / Bathgate, the expansion of Ingliston park and ride are all factors that make sense of a focus on the east of the county and on the Winchburgh area in particular for additional development. Paragraph 5.37 of the Technical Note which states that Transport Scotland may have concerns over the cumulative impact of development on the M8 and M9 corridor, particularly Newbridge, is not understood. SESplan seeks to direct development to areas which can benefit from planned public transport provision, thus further encouraging modal shift. It is now for the agency to carry out the necessary improvements.

Response ID	Respondee	Summary
216	Strawson Property	The number of units for East Lothian is too low for the 2009 - 2019 period compared with the figures for the same period for the other LDP Areas within SESplan. There is proven demand for new housing in East Lothian. It is vital for the economic health of the capital city to ensure that there is sufficient land supply available in the areas of greatest demand.
228	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.1. All comments and responses are limited to the possible impact on Edinburgh.
230	Northumberland County Council (Mrs Helen Drummond)	Agree with Table 3.1. Authorities on both sides of the border have historically acknowledged that local housing markets straddle it, and that the town of Berwick-upon-Tweed in particular, provides housing, employment and services to its rural hinterland, which stretches into the eastern Scottish Borders. The County Council considers that this relationship should be acknowledged in SESplan, as acknowledged in the current Northumberland Local Plan Core Strategy, and that the scale of new housing development in the Eastern Borders SDA should take into account Berwick-upon-Tweed's local 'strategic' role. The current Northumberland Local Plan Core Strategy, Preferred Options for Housing, Employment and Green Belt Consultation Document proposes the identification of land for an additional 900 houses in Berwick to 2031, in line with aspirations to maintain and strengthen Berwick's role as a main town serving a wide rural hinterland. No objection is raised to either the provision of an additional 160 houses in the Eastern Borders SDA or 80 across the Scottish Borders to 2024.
233	Mr Jeff Chalmers	Does not agree with Table 3.1. Edinburgh does not need the new numbers of houses being suggested. These houses cannot be justified. There is no justification for placing Cammo within "West Edinburgh". The area does not have the road or school infrastructure to support such a proposal. Brownfield should be the first choice rather than the green belt.
234	The Cockburn Association (Ms Marion Williams)	The current proposed LDP for the City of Edinburgh already goes beyond the level of development that we consider acceptable. Remain unconvinced that the figures within Table 3.1 are justified. Welcome the priority being given to development on brownfield land, but are disappointed that only a small additional amount has been identified. The SEA's overall assessment of the impacts of additional housing indicates that various negative impacts can be expected. We are concerned that these may have been understated e.g. The detrimental effects upon landscape quality, amenity for communities and cumulative losses of greenbelt land. Increased cumulative, carbon emissions arising from additional housing supply and associated infrastructure could have a significant negative effect on achieving the Scottish Government's aspiration of zero carbon emissions in the near future. We find the generally positive conclusions arising from vehicle emissions confusing. The transport appraisal indicates considerable constraints at congested junctions along the City Bypass at Sheriffhall and Straiton, which may be difficult to resolve, particularly the latter. And yet the Guidance appears to over-ride these constraints in order to meet additional housing land proposals at Shawfair and along the A701 corridor. For the avoidance of doubt, we are concerned that the proposed housing requirement risks creating significant pressure on important landscapes, Green Belt and agricultural areas around Edinburgh. This would be against Scottish Planning Policy which places importance on protecting and enhancing the character, landscape setting and identity of settlements, providing access to open space and conserving prime agricultural land.
243	Kalewater Community Council	Agree with Table 3.1.
250	Mrs Carol Smith	Does not agree with Table 3.1. The city is already densely populated. Question the scale of projected growth, brownfield sites have not been fully used, green belt land should be sacrosanct to maintain quality of life for existing population.
253	Haddington and District Amenity Society (HADAS) (Chairperson Karen Stevenson)	Does not agree with Table 3.1. Considerable concern about the allocations in the current LDP being met on land previously mined (Blindwells). East Lothian has already developed considerable new housing in the period 2009 - 2019, where other authority areas are well behind in meeting their requirements. If the brownfield capacity not available in East Lothian then farmland in areas around all villages and towns will be under pressure with no clear assessment of the capacity of these areas.

Response ID	Respondee	Summary
261	Barratt and David Wilson Homes	Does not agree with Table 3.1. Whilst the SESplan HNDA requirement has now been met in full, this has been achieved through accommodating a significant proportion (40%) of the assessed demand for Edinburgh within adjoining local authority areas , which are all required to accommodate significant increases. It is critical that locations nearest where the demand derives, i.e. Edinburgh, are considered ahead of more peripheral locations. Housing land supply must address the areas of greatest demand otherwise allocations will not deliver the supply of housing envisaged. Whilst maximising investment in the Waverley rail line is supported, the ability for these areas to facilitate over 10,000 more houses than HNDA requires appears excessive. It is considered that there is an over reliance on redirecting Edinburgh's demand to Midlothian and the Scottish Borders. Further land within the South East and West Edinburgh SDA's requires to be considered for release along with further land within the identified North-West / South-West areas linked to key transport corridors. Supporting document submitted.
267	Savills	Does not agree with Table 3.1. Insufficient land has been identified for the most sustainable location for additional housing. More land should be identified to the West of Edinburgh and flexibility should be built in to re-instate significant housing at the Waterfront should the proposals for renewable energy port facilities not come forward.
272	Mr Andrew Carnduff	Does not agree with Table 3.1. The figures appear not to recognise the need for housing near to employment. The need for housing to accommodate workers in the SESplan area is not currently nor in the immediate future, in Fife, it is in Edinburgh and the Lothian's. The distribution of proposed housing is therefore inappropriate. Agricultural land should be protected.
274	Mr Martin Bailey	Does not agree with Table 3.1. Within Edinburgh it is unclear why the Waterfront cannot take more dwellings. The City should accommodate more. Fife has an unfairly generous allocation of new houses. This will encourage commuting by road and rail. West Lothian is an area where industrial redevelopment is comparatively easy to achieve, it will require a greater number of new dwellings than the 23,848 allocated. It also has a fair amount of brownfield land ripe for housing. At one level, the calculations don't appear at another the figures are over-accurate, it is absurd to claim that Midlothian will require so precise a figure (2,371).
279	Dr David Malton	Does not agree with Table 3.1. A disproportionately large number has been allocated to Fife. Aberdour is a non strategic site yet it has been targeted for 60 houses. Aberdour already has traffic problems which deter visitors.
286	Mr Thomson	Does not agree with Table 3.1. The Edinburgh numbers are too high. There is a need to create additional employment in the area of the Borders Railway. More houses in Edinburgh will only aggravate the problems in this area.
295	Balerno Community Council (Mr Richard Henderson)	Does not agree with Table 3.1. The allocation of land must proceed on the basis of a proper analysis of sustainability. The City of Edinburgh's allocation is too high and should not extend beyond the current brownfield land supply. Should be protecting prime agricultural land, the greenbelt and landscape designations. This will ensure that current transport congestion is not aggravated, and the best future use of new transport provision.
302	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.1. The proportion of homes identified in the City of Edinburgh LDP area is too low. Further land for housing should therefore be identified in the City of Edinburgh Area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh, in general, could accommodate further new homes.
308	EDI Brunstane Final	Does not agree with Table 3.1. The housing market in the SESplan area is pressured. Question the figure for total supply and the resultant figure for additional units. There is insufficient explanation as to how the housing land supply has been calculated and how this is based on HLA 2012 data. Assumptions behind the contribution of windfall and constrained sites are not explained. The contribution of the 18,000 units at Leith Docks needs to be clarified. The large contribution from constrained sites within the City of Edinburgh raises ongoing concerns about delivery. The Guidance is drafted on the basis that a very significant increase in housing completion rates suddenly occurs, almost immediately. This is questioned. The Guidance needs to responsibly address the provision of strategic infrastructure.

Response ID	Respondee	Summary
315	Straiton Parks Ltd (Mr Rob Snowling)	In general terms agree with the approach. However, there is additional housing land capacity within the A701 SDA that should be allocated. There is scope to increase the housing land requirement for Midlothian in order to fulfil this objective. A buffer should be added to the land requirements identified in Table 3.1 to ensure that housing land requirements are met in the event that identified sites fail to come forward during the Plan period. There is a strong interrelationship between Edinburgh and Midlothian. Consideration should be given to increasing the housing land requirement for Midlothian instead of seeking to absorb this demand within Scottish Borders and Fife, where there is very little interrelationship with Edinburgh.
327	Miss Ruth Schofield	The principles applied when establishing SESplan should continue to be adhered to. Green belt land should be protected for future generations. Prime agricultural land should not be reallocated on a whim. Transport considerations need to be taken account. Impact on local community and ecology must be taken into account.
338	Mrs Carolyn Craig	Does not agree with Table 3.1. There seems to be a disproportionate amount allocated to Fife compared to other areas, particularly considering the need is for / in Edinburgh. The Borders could take more to support the introduction of a rail service to the Borders? Midlothian is useful as it has easy access to the Edinburgh City By-pass and there is a very small amount allocated to East Lothian although there is a rail link. A new town would have new infrastructure, facilities and amenities rather than overstretching the infrastructure of small villages along the coastline and other areas.
342	Mrs Christine Shaw	Does not agree with Table 3.1. There are still large numbers of brown field sites which are not being build on. Should more desirable areas become available e.g. green belt land, then developers will choose these sites over brownfield opportunities.
345	Mrs Gertrud Mallon	Does not agree with Table 3.1. The numbers allocated to Fife are disproportionately high. The infrastructure is not in place to cope with additional housing development, especially outwith SDAs.
352	Mrs Anna Purdie	Does not agree with Table 3.1. The number of housing allocations in Fife are disproportionate. There have been large amounts of housing development in the past years and the area does not have the necessary supporting infrastructure. Coastal towns need to be preserved.
360	Mr Kenneth Murray	Does not agree with Table 3.1. No satisfactory explanation as to why the allocation for Fife should be so high.
364	Ogilvie Homes	Does not agree with Table 3.1 since it cannot be reasonably justified. It has been clear from the outset that the plan has been prepared on the basis that the City of Edinburgh was unwilling to meet its own housing land requirement. The consequence being that a certain proportion of the identified requirement would require to be met within adjoining authority areas. Whilst further details have now been provided, this information still lacks the level of detail and substance which is reasonably required. In particular, no reasonable justification has been provided as to why such a significant proportion of the City of Edinburgh requirement has been exported. The Guidance is attempting to force house buyers to move to particular locations by preventing new housing being built in <u>those areas where they actually want to live</u> .
370	Ashdale Land and Property	Does not agree with Table 3.1 since it cannot be reasonably justified. It has been clear from the outset that the plan has been prepared on the basis that the City of Edinburgh was unwilling to meet its own housing land requirement. The consequence being that a certain proportion of the identified requirement would require to be met within adjoining authority areas. Whilst further details have now been provided, this information still lacks the level of detail and substance which is reasonably required. In particular, no reasonable justification has been provided as to why such a significant proportion of the City of Edinburgh requirement has been exported. The Guidance is attempting to force house buyers to move to particular locations by preventing new housing being built in <u>those areas where they actually want to live</u> .
375	Mrs Alison Stewart	Current proposals are for Fife to provide 43% of housing development outwith SDAs. This is extremely high and query whether such a high allocation is both justified and proportionate.
378	Mrs Elaine Hutchinson	Prime agricultural land, at a time when food security is becoming of increasing concern, should be protected. Greenbelt and landscape designations should also be protected.

Response ID	Respondee	Summary
386	Mr Patrick Mitchell	Does not agree with Table 3.1. The Guidance relies on the completion of the tram line to Leith for sufficient infrastructure linking down to Granton. This will significantly limit future development in Granton although this has the bulk of Edinburgh's allocated housing development. The numbers require housing completions to rapidly rise, this is unlikely to happen, but by this time large swathes of greenbelt land will be lost. The Guidance needs to focus development on the new Waverley line to Galashiels. This line is forecast to be significantly underused. Development in West Lothian needs to be considered in terms of existing road infrastructure capacity. The approach to Edinburgh from the west is at capacity and will not be able to take significant additional commuter traffic. The Guidance and the latest LDP for Edinburgh does not fully consider existing capacity issues at key junctions leading into Edinburgh.
393	Mrs Caitlin Hamlett	Does not agree with Table 3.1. Ensuring the additional housing land requirement for the City of Edinburgh will force the release of prime greenfield sites in unsustainable locations. The erosion of prime agricultural land, green belt and open space outwith the designated SDAs is of particular concern. Insufficient weight is given to the constraints of prime agricultural land, green belt, open space and landscape.
403	Mr John Watkins	Does not agree with Table 3.1. There is no need for the additional housing. It is grossly unfair on Edinburgh to take the highest number of houses. There are huge tracts of countryside that are not green belt outwith the city which could be developed if really necessary.
408	Burnside	Does not agree with Table 3.1. The Technical Note (Chapter 3) identifies Edinburgh, Fife, Scottish Borders and East Lothian as the areas of most need. Midlothian has been allocated too much. Edinburgh city has the highest need perhaps more high density housing could be built there.
414	Juniper Green Community Council (Mr Neil Ingram)	Does not agree with Table 3.1. The proposed distribution delivers the revised housing figures, but will put all authorities under pressure to find significant amounts of undeveloped land, including some green belt land, to meet the figures.
426	Mrs Susan Warwick	Does not agree with Table 3.1. The release of green belt to accommodate housing should be very carefully examined. The land at Cammo is prime arable land and should be preserved for the generations to come.
429	HPG Dalkeith Ltd	Does not agree with Table 3.1 since there is no evidence provided to justify the land distribution contained therein. The figures appear to be based on established and not effective land with no explanation of how that land will come forward. Further detail submitted in relation to a site at Cauldcoats Farm. Many sites identified within Midlothian are not effective. The actual figure for need and demand within Midlothian is an underestimate.
439	Mr James Poseley	Does not agree with Table 3.1. There is no justification or analysis of the housing need. The numbers have no links to future employment prospects or trends. There are serious environmental and infrastructure constraints in developing the Cammo area of West Edinburgh.
450	IBG Stakeholders (Mr. Peter Carus)	Does not agree with Table 3.1. Given that Edinburgh generates by far the most demand / need for new housing within the SESplan housing market, it is considered that the proportion of homes identified in the City of Edinburgh LDP is too low, being only 27% of the total housing land requirement 2009 - 2024. Further land for housing should therefore be identified in the City of Edinburgh Council area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh in particular could accommodate further new homes.
454	The Royal Bank of Scotland (RBS)	Does not agree with Table 3.1. Given that Edinburgh generates by far the most demand / need for new housing within the SESplan housing market, it is considered that the proportion of homes identified in the City of Edinburgh LDP is too low, being only 27% of the total housing land requirement 2009 - 2024. Further land for housing should therefore be identified in the City of Edinburgh Council area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh in particular could accommodate further new homes.
457	Firrhill Community Council (Mr James Napier)	Does not agree with Table 3.1. Do not consider that the housing land requirement identified in Table 3.1 is justified. New development proposals will undermine the delivery of housing on existing brownfield sites.

Response ID	Respondee	Summary
463	Banks Group (Mr Alistair Landells)	Does not agree with Table 3.1. Appears that the major release suggested for North West Edinburgh and South West Edinburgh will be most certainly required. Not clear how East Lothian will be able to meet this level of extra requirement. Fife numbers can be dealt with in theory but not based on any likelihood of deliverability. Simply no arithmetical justification is put forward to justify why Midlothian are only taking an extra 100 units. Allocations are already substantial in Scottish Borders and whilst the additional figure is very small (240) there is an argument that there is already sufficient allocations made. No arithmetical equation to justify West Lothian only taking an additional 370 units. The numbers are very confusing and deceiving.
466	Mrs Blythe Peart	Does not agree with Table 3.1. The requirement for extra land for housing in the other LDP areas is to meet the needs of the City of Edinburgh. Research from Bank of Scotland indicates that there are around 10,000 empty homes in Edinburgh. These should be brought back into use before releasing greenfield land.
468	Miller Homes East Scotland Ltd	Agrees with Table 3.1. The key issue will be for Fife to ensure that the additional allocations are identified in the right place. The Reporter in the Mid Fife Local Plan Examination considered the site at Gallows Knowe, Crossgates as meeting the tests of effectiveness in full.
482	Strutt and Parker (Mr John Wright)	Agree in part with Table 3.1. Further detail should be provided on the barriers and constraints to development in the Edinburgh City Area. This is the Capital of Scotland, and will need to grow to maintain its attractiveness to investment. Steps should be taken to remove barriers to development to prevent stagnation. Displacing development outwith the City serves to prevent delivery of affordable housing and results in house price increases and unsustainable patterns of in-commuting. Are supportive of the identification of SAA 9.
489	Dr Caroline Richie	Does not agree with Table 3.1. Concerned that areas designated for housing in the draft City of Edinburgh Local Plan involve good quality agricultural land. How will food security be maintained? Acknowledge that there may be a need to build upon the Green belt but concerned at the extent to which this is taking place.
496	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.1. There is no justification or explanation for the level of identified housing need and demand for Edinburgh which is being delivered outwith the City. Edinburgh should deliver more of its own housing need and demand.
507	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.1. Approach to housing land distribution would start by asking whether the pattern of demand evidenced in a HNDA could be met. Assertions have been made that it may / will not be possible to meet demand arising in Edinburgh in or close to the city. The evidence for these assertions is clearly lacking. The Guidance proposes to deflect 35% of Edinburgh's demand elsewhere in the period 2009 - 2019, and 51% in 2019 - 2024. The re-assessment of capacities and constraints is weak. Little detail is available on the additional sites considered and little justification offered as to why West Edinburgh and East Lothian could not accommodate more. The assessment of SAAs 9, 10, 11, 21, 22, 23 is superficial.
514	Aberdour Community Council	Does not agree with Table 3.1. Fife has been allocated a disproportionate number of houses.
519	Wallace Land Investment & Management	Does not agree with Table 3.1. The figures are not fully explained or justified, with no supporting evidence provided. The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement for each LDP area. This is contrary to SDP Policy 5 and SPP. The identification of Additional Allowances is not required. Redistributing 35% of Edinburgh's need and demand out of the City in the period 2009 - 2019 and 50% in the period 2019 - 2024 is unsustainable as it encourages commuting back into the City. The development strategy for the redistribution is random and not supported by economic growth or transport improvements. The strategy should follow the HMAA evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife. The contribution from constrained sites is overstated. Supporting document including proposed modifications submitted.

Response ID	Respondee	Summary
528	Hallam Land Management	Does not agree with Table 3.1. The figures are not fully explained or justified, with no supporting evidence provided. The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement for each LDP area. This is contrary to SDP Policy 5 and SPP. The identification of Additional Allowances is not required. Redistributing 35% of Edinburgh's need and demand out of the City in the period 2009 - 2019 and 50% in the period 2019 - 2024 is unsustainable as it encourages commuting back into the City. The development strategy for the redistribution is random and not supported by economic growth or transport improvements. The strategy should follow the HMAA evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife. The contribution from constrained sites is overstated. Supporting document including proposed modifications submitted.
530	Murray Estates C/o Holder Planning	Does not agree with Table 3.1. The figures are not justified. The proposed distribution does not adequately reflect the patterns of demand and housing market analysis within the HNDA. The Guidance proposes to redistribute significant levels of Edinburgh's housing demand during the periods 2009 - 2019 and 2019 - 2024 primarily to Midlothian and Scottish Borders, and to a lesser extent Fife and East Lothian. This is not fully reflective of the housing market analysis undertaken. It is flawed to rely on the Scottish Borders to such an extent. The strategy will be undeliverable in terms of market demand.
541	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.1. The figures are not justified and does not reflect the patterns of demand and housing market analysis as presented by the HNDA. Selective account and application of infrastructure / environmental constraints appears to have been taken in reaching these conclusions. Redistributing significant levels of Edinburgh's housing demand is not fully reflective of the housing market analysis undertaken. The reliance on Scottish Borders is flawed. There is a risk the strategy will be undeliverable.
548	Scottish Property Federation (Mr David Melhuish)	Does not agree with Table 3.1. Further planned expansion of housing allocations is feasible and desirable in the City of Edinburgh area. Question whether Fife will be able to deliver the housing identified. In West Lothian there is significant investment in the Winchburgh area but this will need to be supported by progress with infrastructure improvements.
551	Ashfield Commercial Properties Ltd	The greatest challenge lies at the local level where sites for these additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing, take a proportion of the City's need and demand in addition to meeting their own housing need and demand, such as East Lothian. As no significant brownfield sites have been identified, greenfield sites have to be included.
558	Mr Nick Lansdell	Does not agree with Table 3.1. The proportion of housing required from West Lothian is not supported by the availability of infrastructure. Creating housing in support of the City creates an unsustainable environment impact and an impact on quality of life for West Lothian residents who are increasingly living not in a semi-rural environment but a series of sprawling conurbations. The numbers for West Lothian should be reduced.
566	Morrison	Does not agree with Table 3.1. There is no satisfactory explanation or justification for the increase in the numbers. Justification of the specific areas to be included particularly the proposed use of existing Green Belt land should be provided.
577	Mr Archibald Clark	Does not agree with Table 3.1. The HNDA figures are based on GROS which are themselves based on estimates, trends and migration and take no account of the change in the economic situation that has developed since. It is unwise to be identifying land beyond a 10-year period since such figures become progressively more unrealistic. The major conurbations in the central belt are spreading out into good quality agricultural land. Densities should be increased. The assumption that 'family-size' houses are needed is not borne out by the statistics. Should be looking at existing infrastructure (roads, sewers, gas, electricity, school and shopping provision) to support new / replacement housing rather than extending the roads to new sprawling low-density estates.
588	Cadzow Estate	Does not agree with Table 3.2. Do not agree that West Lothian is in any way self-contained. Concerned that the provision of sufficient housing to supply the 'cross Plan' requirement created by the Gyle / Airport / Newbridge / Livingston employment corridor has not been adequately addressed. Despite this corridor being a primary economic driver for the region the requirement assessed for West Lothian appears to be very conservative and out of kilter with some of the other plan areas.

Response ID	Respondee	Summary
Question 3 - Do you agree with the breakdown by Strategic Development Area as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances by Strategic Development Area set out in Table 3.2 of the Supplementary Guidance?		
9	Ms N Clarke	Does not agree with Table 3.1. The rapid urbanisation of East Lothian has had a detrimental effect on public transport systems, schools and healthcare. Continually building on greenfield sites severely damages the environment, biodiversity, food security and quality of life. A railway is being built in the Borders yet they have only been allocated a limited number of houses.
14	Alfred Stewart Properties Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
20	Regenco (Trading) Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
28	Liberton and District Community Council (Mr Jim Henry)	Agree with Table 3.2. The Scottish Ministers' Approval Letter gives priority to the development of brownfield land and to land in the thirteen SDAs. The increase in the South East Edinburgh SDA on the face of it appears excessive. However, the increases in some of the other SDAs are much greater. However paragraph 3.10 indicates that it is the role of LDPs to identify how much housing land should be allocated to the SDAs placing in question the value of Table 3.2. This means that should City of Edinburgh deem it acceptable the South East Edinburgh SDA could be expected to take more than 2,500. The intentions of City of Edinburgh will not be known until June 2014 at the earliest. The approach in paragraph 3.10 is wrong. SESplan should play its strategic planning role and be the vehicle for setting the housing land targets within its area. Liberton and District Community Council is prepared to accept the allocation of 2,500 houses in the South East Edinburgh SDA for the period 2009 - 2024 as a maximum number. No additional houses should be allocated to this SDA over the period to 2032.
33	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.2. West Lothian is too small a county for a large number of new houses. Most of West Lothian is good agricultural land and the increase of new houses is going to take up too much land. An increase in population is going to need more food.
36	Milesmark and Baldrige Community Council (Mr Alex McLaren)	Does not agree with Table 3.2. North Dunfermline already has an agreed plan for significant development. It would appear that there are other areas closer to the M90 that haven't been considered within Fife e.g. Kelty, Kinross and Southern Dunfermline. The allocation seems to be overtly biased to one area of Dunfermline.
39	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.2. There is not enough brown land sites to build all those houses. Good farm land is needed to grow food for the rising population, that is disappearing fast. West Lothian has good agricultural land for crop growing this should be protected.
44	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.2. The distribution of housing numbers in the SDAs should be used to realise strategic infrastructure, placemaking and green network opportunities. Collaboration will be required. The Guidance presents an opportunity to set a strategic direction for maintaining green belt character and function in and around areas proposed for development. SNH recommend that the Guidance should set out written or spatial requirements for strategic green infrastructure provision within the green belt.

Response ID	Respondee	Summary
52	Dr Tom Slater	Does not agree with Table 3.2.
59	Mr Scott Mackenzie	Agree with Table 3.2.
66	Gladman Developments (Simon Dean)	Agree with Table 3.2. It is important that SESplan sets out how the full, assessed need will be provided for across the SDP area. This will give the relevant authorities the information they need to produce LDPs to begin to address the housing needs in their areas. The breakdown by SDA will also assist in identifying where additional sites are required in order to meet those needs.
75	SEPA (Mr Paul Lewis)	SEPA cannot answer this question without comprehensive assessments of all allowances, for which detailed site boundaries would be necessary. Flooding and water management is of concern. SEPA understands that water and drainage infrastructure capacity has been taken into account when assessing infrastructure constraints. This assessment however, only considers Scottish Water infrastructure and not other issues relevant to water management. The impacts of development on ground and surface water within South East Edinburgh for example and the potential for increased flood risk from inadequate drainage or a lack of integration of drainage between individual developments is of considerable concern to SEPA. An even greater housing land allowance in this area between the Edinburgh and Midlothian Council areas only emphasises the need for strategic SUDS to enable development in and between these two LDP areas.
85	Musselburgh Conservation Society (Mr Barry Turner)	Does not agree with Table 3.2. Numbers should be increased to reflect potential public transport improvements. The numbers in East Lothian can only be justified subject to the following provisos. Suitable Green belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability. Green belt must be protected where it serves a particular purpose. There must be recognition of capacity constraints relating to existing communities and their services and to town centres. There must be avoidance of conglomerations of development. Such unacceptable concentrations could well be possible around Wallyford, Tranent, Prestonpans and Longniddry in East Lothian. Rail transport improvements must be delivered in East Lothian to include more peak hour trains, a half hourly off peak service, a new station at East Linton and cross-Edinburgh peak hour trains. There should be a greater allocation to the eastern Borders area associated with a new station at or near Reston and an appropriate level of service to it by stopping trains between Edinburgh and Berwick. More jobs must be provided. There must be grade separation at Sheriffhall junction and improvements at the Old Craighall junction. There is an intact disused railway line that serves the northern end of the A701 corridor. This could become part of an extended tram network at minimum cost if trams are to run to the Royal Infirmary and thus could open up areas to development.
98	Cllr Dave Dempsey	Does not agree with Table 3.2. Comments relate to North Dunfermline and Ore / Upper Leven Valley SDA. It's for Fife to determine the breakdown in a manner that's open to public scrutiny. The document is too obscure and opaque to allow the lay public to take a sensible view.
105	Mr Grant McCulloch	Does not agree with Table 3.2. The current green belt is robust and it is clearly defined by the Maybury Road, and city by-pass. The IBG proposal is accepted, but the rest of the green belt around West Edinburgh should be left as it is. There has been no good explanation as to why the substantial increases from the MIR and Proposed Plan are now sought. Encroachment onto the green belt should not be allowed without justification.
114	Murieston Community Council (Mr Davidson McQuarrie)	Agrees with Table 3.2.
124	Miss Carolyn Campbell	Does not agree with Table 3.2. The Cammo site is on Green Belt land and if it is lost to housing it will be the start of a gradual erosion off the green belt in the west of Edinburgh. The Maybury / Barnton road cannot cope with the present volume of traffic. There will also be more traffic coming into west Edinburgh when the new Forth crossing is completed.
131	Banks Group (Mr Alistair Landells)	Agrees with Table 3.2.
132	Banks Group (Mr Alistair Landells)	As Response 131.

Response ID	Respondee	Summary
140	Mr Alan Harrison	Does not agree with Table 3.2. The roads are full to capacity hence traffic control on A90 into and out of city at rush hour, there are no schools, doctors, dentists available. The tolls on the bridge should be £5 to reduce traffic and encourage park and ride for the extra houses in Fife.
146	Dr Simon Jackson	Does not agree with Table 3.2. There are plenty of unfinished developments suggesting that locally there is not the demand for housing. Cammo is not West Edinburgh. Roads / schooling / GPs etc are not in the area locally to support all the extra housing.
163	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.2. 5,000 new houses should be provided for across the Edinburgh area. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
172	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.2. Content, subject to your responses to questions 5 and 6 (Responses 174 and 175)
179	Mansell Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.
185	TMS Planning Services	The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.

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191	Campion Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
197	Muir Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
210	Aithrie Estates	Does not agree with Table 3.2. The breakdown by SDAs and in particular the use of one SDA across West Lothian is flawed. It is the role of the SDP to give guidance to the LDP. Leaving the decision solely to the LDP as to the locations which will best achieve house completions is an abrogation of responsibility. Flexibility is hardly relevant in dealing with what can only be described as a crisis from delaying the process for many years. This delay has contributed to the massive backlog in the supply of housing land and particularly completed homes. It is incumbent on the SDPA to devise a plan which gives the best chance of achieving a step change in house completions by 2019 and then by 2024. The developers behind large developments in West Lothian are at considerable risk. Because the housing numbers were derived from calculations of historic need, no thought was given to what would be an economic scale of development standing the significant contributions to schools and other infrastructure required of the developers. The LDP should be set the task by SESplan and the SG of making further allocations of new housing land that will maximise output and thus instil confidence and make best use of the planned new infrastructure for which the developers have to pay.

Response ID	Respondee	Summary
217	Strawson Property	Does not agree with Table 3.2. A greater proportion of the Additional Allowance should be directed towards East Lothian to reflect the higher demand for new housing within the East Lothian SDA compared with other SDAs.
227	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.2.
231	Mr Jeff Chalmers	Does not agree with Table 3.2. Edinburgh does not need the new numbers of houses being suggested. These houses cannot be justified. There is no justification for placing Cammo within "West Edinburgh". The area does not have the road or school infrastructure to support such a proposal. Brownfield should be the first choice rather than the green belt.
235	The Cockburn Association (Ms Marion Williams)	Do not agree with Table 3.2 which would lead to unacceptable pressures on the Green Belt. West Edinburgh - The allocation has increased from 1,000 units to 2,700. As there are significant constraints in this area, it is not clear how the increase of 1,700 units is to be achieved - more land take (Green Belt)? - higher density? - combination of both? South East Edinburgh - The allocation has increased from 850 units to 2,500. Comments as for West Edinburgh SDA, with strong concerns as the scenic Edmonstone Hill. A701 Corridor - Allocation increased from 500 to 750, despite severe transport constraints, green belt damage and coalescence issues.
244	Kalewater Community Council	Agree with Table 3.2.
251	Mrs Carol Smith	Does not agree with Table 3.2. West Edinburgh - Bears a disproportionate share of proposed development. Brownfield sites in city centre not used. West Lothian and A701 corridor more suitable. Edinburgh City Centre - Brownfield sites and unused land in city centre should be used where infrastructure already in place - no allocation is made for these sites, why? A701 Corridor - Only 701 houses allocated, this area could absorb far more. West Lothian - Many areas in west Lothian are underused and of little landscape value. Areas of defunct industrial use could be rehabilitated.
254	Haddington and District Amenity Society (HADAS) (Chairperson)	Nothing to add. See Response 253.
262	Barratt and David Wilson Homes	Does not agree with Table 3.2. A reduced allowance within North Dunfermline and the Ore / Upper Leven Valley should be made due to deliverability concerns within the pre-2019 period. Several of the local authorities, namely Fife (additional 6,000 units), Edinburgh (additional 4,700 units) and East Lothian (additional 2,810 units) have all had to accommodate significant further housing in the period to 2024. However, notwithstanding the Spatial Strategy Assessment review the Guidance and Technical Note does not seem to infer significant new areas have been identified. The majority of the housing land allocations have already been identified in Midlothian and the Scottish Borders. The increased allowance for East Lothian is substantial but the majority of the area remains highly marketable and has the highest potential to deliver outwith Edinburgh. Additional allowances for West Lothian are acceptable based on balancing new sites with existing provision. Further medium scale sites are required to deliver the strategy. The main concern is Fife, where an additional 7,800 houses to 2024 are added, with significant deliverability concerns. The allowances for Edinburgh should be increased further in terms of North-West / South-West and the SDA areas. Supporting document submitted.
269	Savills	Does not agree with Table 3.2. As it is a more sustainable location, more housing should be directed to West Edinburgh. Flexibility should also be built in to allow for more housing at Edinburgh Waterfront should proposals for renewable energy port facilities not come forward as currently planned.
285	Mr Thomson	Does not agree with Table 3.2. The broad statement West Edinburgh hides the need to be more specific about the particular areas which have been identified. This area is green belt and should be protected.

Response ID	Respondee	Summary
287	Yeoman McAllister Architects (Mr Mark King)	Does not agree with Table 3.2. There are sites within and outwith Edinburgh that either have disused open space or have consents for a use which there is no demand. These sites could be used to increase housing supply and avoid greenbelt and countryside release. Sites closer to the airport and along local rail systems would provide a better solution for development than to ruin the East Coast and its village / golf course and coastal pattern. Distribution of East Lothian's allocation should be to other areas such as the Borders and Edinburgh's villages and west airport side. Obvious capacity exists between the existing north settlement boundary of Ratho and the M8.
291	Mr Jon Grounsell	Does not agree with Table 3.2. There is no mechanism in the system to stipulate density. Failing to build in the city centre at maximum density has massively adverse impacts on loss of greenfield land elsewhere and creates unsustainable transport patterns. Minimum density levels should be set throughout the Leith area and Granton at 4 - 5 storeys high. Opportunity to build on higher ground of low agricultural value to the South East of Rosewell. There is very limited capacity to build on the A701 corridor without damaging the separation between towns and high quality landscape - not recognised in the draft Midlothian LDP. Much greater focus on brownfield land is required.
304	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.2. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained, will be subjected to further delays and may not come forward at all. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in Kirkliston on the edge of the West Edinburgh SDA could help to deliver new housing.
309	EDI Brunstane Final	Does not agree with Table 3.2. SPP outlines the purpose of green belt designation. Consider that it is entirely appropriate at the point in the Development Plan cycle where strategic and local policy are under review, to undertake a more radical review of green belt boundaries. Brunstane, as a strategic site (up to 1,200 units) within the established South East Edinburgh SDA should be afforded a specific mention in the Supplementary Guidance. There is a strong policy presumption in SESplan that the SDAs are the priority locations for growth, in comparison to any areas outwith them. Strategic housing development should be located as close to Edinburgh as possible, in locations which are highly accessible by public transport, rather than further afield.
316	Straiton Parks Ltd (Mr Rob Snowling)	Does not agree with Table 3.2. Fully support the identification of land within the A701 corridor for 750 homes. However this scale of housing requirement fails to acknowledge the potential capacity of land at West Straiton (within the A701 corridor) to accommodate housing growth as part of a sustainable mixed-use development. We also consider that this scale of development is insufficient to deliver the A701 Bypass. The A701 Corridor SDA has significant capacity for additional residential development and its housing requirement should be increased to reflect this.
325	Friends of Cammo (Mr Simon Gillam)	Does not agree with Table 3.2. If the Edinburgh LDP continues to rule out areas south of the A8 for housing development, 2,700 new houses could not be accommodated in West Edinburgh SDA without adverse effects on Cammo Estate.
340	Mrs Carolyn Craig	Does not agree with Table 3.2.
365	Ogilvie Homes	Does not agree with Table 3.2. On the basis of the information which is set out both within the Guidance itself and its associated Technical Note, it is simply not possible to establish if the breakdown of the housing land requirement detailed in Table 3.2 is reasonable or otherwise. The Guidance, has significantly over estimated the contribution from constrained sites. The Guidance must set out a firm and positive commitment to the identification of new sites to augment the established supply in order to ensure that the <u>requirement to maintain, at all times, a generous supply of housing land can be met.</u>
371	Ashdale Land and Property	Does not agree with Table 3.2. On the basis of the information which is set out both within the Guidance itself and its associated Technical Note, it is simply not possible to establish if the breakdown of the housing land requirement detailed in Table 3.2 is reasonable or otherwise. The Guidance, has significantly over estimated the contribution from constrained sites. The Guidance must set out a firm and positive commitment to the identification of new sites to augment the established supply in order to ensure that the <u>requirement to maintain, at all times, a generous supply of housing land can be met.</u>

Response ID	Respondee	Summary
379	Mrs Elaine Hutchinson	Does not agree with Table 3.2. Development at any cost must be sustainable respecting the needs of the environment.
388	Mr Patrick Mitchell	Does not agree with Table 3.2. The additional allowances for Edinburgh appear contrary to the stated policy of focussing development in 3 main areas. The numbers for South and West Edinburgh should be reduced to the previous levels and the plan amended to encourage development across the city (rather than focussed in a few locations) to minimise infrastructure strain. The Guidance appears to focus on development at all costs to significantly expand Edinburgh, without clearly identifying the demand.
404	Mr John Watkins	Does not agree with Table 3.2. The West Edinburgh area should be hugely reduced in favour of all the other areas outwith Edinburgh where there is considerably more land available (if all these units are really necessary at all).
410	Burnside	Duplicate Response. See Response 408.
415	Juniper Green Community Council (Mr Neil Ingram)	Agrees with Table 3.2. The required extra numbers will be difficult to achieve, but at least these areas have access to the planned improvements to infrastructure necessary for significant development set out in the draft Local Plan.
420	The Crown Estate (Mr Robert Murphy)	Agree with Table 3.2. A response including supporting documentation related to Sites R3 and R5 within Rosewell was submitted to the Midlothian MIR process.
421	Mr Keith Doig	Does not agree with Table 3.2. There is no justification for Cammo being included in "West Edinburgh". There is very little regard for the lack of infrastructure and traffic issues which will result. Existing schools are already at full capacity. There is a huge number of brownfield sites available for building. The Cammo fields / estate are home to a great deal of wildlife, much of it endangered.
422	Mr James Poseley	Does not agree with Table 3.1. Intent on putting houses in West Edinburgh without proper consideration of the need for houses and infrastructure and environmental issues. The Cammo fields are a source of natural beauty and wildlife. Allocations should be made within Edinburgh City Centre and at Edinburgh Waterfront.
423	Mr James Poseley	Duplicate Response. See Response 422.
430	HPG Dalkeith Ltd	Does not agree with Table 3.2. It is not clear where the breakdown has emerged from. The refresh of the Spatial Strategy Assessment is subjective arbitrary and contradicts statements made in MIRs and Proposed LDPs. There are doubts as to the effective supply.
442	Old Road Securities Plc (Mr Robert Murphy)	Agrees with Table 3.2. A response was submitted to the Midlothian MIR process on Site G1 (Redheugh West).
443	Cramond and Barton Community Council (Dr Patricia Eason)	Does not agree with Table 3.2. The additional 2,700 units in West Edinburgh cannot be justified. The allocation would further exacerbate peak traffic congestion. Major investment in new primary and secondary school facilities will be required.
451	IBG Stakeholders (Mr. Peter Carus)	Does not agree with Table 3.1. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained and will be subjected to further delays. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in West Edinburgh which could help to meet housing needs.
456	The Royal Bank of Scotland (RBS)	Does not agree with Table 3.2. RBS supports the identification of West Edinburgh as an SDA. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained and will be subjected to further delays. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in West Edinburgh which could help to meet housing needs.
458	Firrhill Community Council (Mr James Napier)	Agree with Table 3.2. Need to consider whether the green belt should be retained or not. Continued erosion will lose all control.
464	Banks Group (Mr Alistair Landells)	Agree with Table 3.2. See Response 463.

Response ID	Respondee	Summary
467	Mrs Blythe Peart	Does not agree with Table 3.2. The additional allowance along the Borders Rail Corridor appears to be minimal. There are greater opportunities to build-in capacity for additional housing, than with the ECML which only has capacity in its current form for the next 12 years.
470	Miller Homes East Scotland Ltd	Does not agree with Table 3.2. The settlement of Crossgates is located in neither the Fife SDAs. The Ore / Upper Leven Valley SDA is focused on a corridor that would not be attractive to house builders.
483	Strutt and Parker (Mr John Wright)	Agree in part with Table 3.2. The displacement of housing numbers from Edinburgh is not properly justified. Are supportive of the identification of SAA 9.
497	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.2. The numbers are not clearly justified. On what basis has the reprogramming of brownfield land in Edinburgh taken place? There is no evidence to state how the constrained supply has been calculated. If aiming to deliver a generous supply the housing land requirement should be higher by up to 20%.
502	Miss Sally McKenzie	Does not agree with Table 3.2. Existing brownfield sites appear to have been left out of the equation. There appears to be a significant disparity between the breakdown required for Fife and other regions. Fife should have less do a burden than that currently allocated.
509	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.2. This approach is potentially-misleading. The SDP should simply set out the housing requirement to be met. The task of demonstrating how the requirements can be met should fall to the LDP. The Guidance makes unsubstantiated assertions about constrained sites and potential windfall contributions. Paragraph 3.9 does not accord with SDP Policy 7 as amended by Ministers.
515	Aberdour Community Council	No specific opinion.
521	Wallace Land Investment & Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
531	Murray Estates C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
534	Hallam Land Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.

Response ID	Respondee	Summary
542	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
553	Ashfield Commercial Properties Ltd	The greatest challenge lies at the local level where sites for these additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing, take a proportion of the City's need and demand in addition to meeting their own housing need and demand, such as East Lothian. As no significant brownfield sites have been identified, greenfield sites have to be included. Goshen Farm is located within the East Lothian SDA and can accommodate up to 1,200 units. The site can come forward now in order to help East Lothian Council maintain a five years' effective housing land supply.
559	Mr Nick Lansdell	Does not agree with Table 3.2. The numbers will put pressure on green field sites within West Lothian. There should be a presumption against large scale development which impacts adversely upon communities and support for small scale affordable development. The numbers should be reduced and there should be a presumption against large development against community wishes. Economic sites should be protected.
567	Morrison	Does not agree with Table 3.2. Object to the inclusion of Green Belt land. Brownfield sites should be prioritised along with additional development opportunities along the tram corridor. No justification has been given for Cammo being included in West Edinburgh.
572	Scottish Property Federation (Mr David Melhuish)	Does not agree with Table 3.2. The Additional Allowances in West Edinburgh and A7 / A68 / Borders Rail Corridor could be increased and may need to be in order to make up for the expectation that the waterfront will not deliver as expected by Edinburgh.
574	Mrs Christine Briffitt	Does not agree with Table 3.2. The allocation of numbers is disproportionately high for Fife. Fife has seen a huge amount of development in the last 10 years. The infrastructure is not in place particularly Outwith SDAs. The allocation of houses in small coastal villages and other areas of special interest should be avoided at all costs.
578	Mr Archibald Clark	Any encroachment into Green Belt / undeveloped land must be avoided until land for future agricultural production can be protected. Densities should be increased and the Scottish Government must provide incentives.
589	Cadzow Estate	Does not agree with Table 3.2. Do not agree that West Lothian is in any way self-contained. Concerned that the provision of sufficient housing to supply the 'cross Plan' requirement created by the Gyle / Airport / Newbridge / Livingston employment corridor has not been adequately addressed.

Response ID	Respondee	Summary
Question 4 - Do you agree with the additional allowances outwith Strategic Development Areas as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances outwith Strategic Development Areas set out in Table 3.2 of the Supplementary Guidance?		
15	Alfred Stewart Properties Ltd	<p>Paragraph 3.10 - The SDP should be locationally specific as where such allocations outwith SDAs should be made. The figures in Table 3.2 are too low. 'Additional Allowances' should be renamed 'Additional Requirement' to comply with the SDP and SPP.</p> <p>Paragraph 3.13 - The Member Authorities should not use housing completion rates as a means of avoiding allocations responsibilities. If sufficient land is allocated in the right places, development rates will increase. Section 4 of the Technical Note clearly demonstrates that the surrounding areas to Edinburgh are a major attraction to house buyers leaving the City. This is due to a lack of affordable family housing within the City. Table 4.1 of the Technical Note is misleading. The Table tries to compare average completion rates from 2004 - 2012 against a requirement that starts in 2009. Replacement figures for Table 4.1 submitted. The replacement figures demonstrate additional land / planning consents must come forward on land that is deliverable in the short term to increase annual completion rates. The increase in the additional allowance outwith SDAs in Fife is welcomed. Further detail is required in support of Table 6.2 of the Technical Note. There would appear to be no detailed technical analysis of need and demand as it relates to accessibility or weighting given to any of the factors considered. Paragraph 6.5 of the Technical Note refers to SDP2. If this information is available it should be applied to SDP1 through this Supplementary Guidance. The Guidance and Technical Note appear to be ignoring the reality of the housing market in the SESplan area.</p>
21	Regenco (Trading) Ltd	<p>Paragraph 3.10 - There is no mechanism within the SDP that allows the separation of within and outwith SDAs. SDP Policy 7 allows for land to come forward outwith SDAs only to maintain a five year housing land supply. Concern has previously been raised that West Lothian is a stand alone SDA. The Winchburgh secondary school will be delivered in 2017 / 2018, as such Winchburgh is an inherently deliverable location for new residential development. The figures in Table 3.2 are too low. 'Additional Allowances' should be renamed 'Additional Requirement' to comply with the SDP and SPP. Paragraph 3.13 - The Member Authorities should not use housing completion rates as a means of avoiding allocations responsibilities. If sufficient land is allocated in the right places, development rates will increase. Section 4 of the Technical Note clearly demonstrates that the surrounding areas to Edinburgh are a major attraction to house buyers leaving the City. This is due to a lack of affordable family housing within the City. Table 4.1 of the Technical Note is misleading. The Table tries to compare average completion rates from 2004 - 2012 against a requirement that starts in 2009. Replacement figures for Table 4.1 submitted. The replacement figures demonstrate additional land / planning consents must come forward on land that is deliverable in the short term to increase annual completion rates. The increase in the additional allowance outwith SDAs in Fife is welcomed. Further detail is required in support of Table 6.2 of the Technical Note. There would appear to be no detailed technical analysis of need and demand as it relates to accessibility or weighting given to any of the factors considered. Paragraph 6.5 of the Technical Note refers to SDP2. If this information is available it should be applied to SDP1 through this Supplementary Guidance. The Guidance and Technical Note appear to be ignoring the reality of the housing market in the SESplan area. Paragraph 5.39 of the Technical Note notes that there remain issues of infrastructure and environmental constraints along the M9 Corridor (Area 6) in settlements including Linlithgow, Livingston and Winchburgh. Infrastructure is being implemented in phases. West Lothian is capable of accommodating further strategic growth beyond that which the Supplementary Guidance suggests.</p>
29	Liberton and District Community Council (Mr Jim Henry)	<p>If paragraph 3.10 is not amended, it could result in the allocation of land for up to 2,500 houses split between West Edinburgh and South East Edinburgh, the proposal in Table 3.2 is not the preferred option of Liberton and District Community Council. The Council considers that to accommodate the 2,500 houses outwith the existing SDAs SESplan should identify another SDA to facilitate meeting this land requirement. An alternative would be to require that the allocation be met from sites dispersed throughout City of Edinburgh Council area and directed by means of a hierarchy of development starting firstly with brownfield land, then to non-prime agricultural land, then land outwith the Green Belt.</p>

Response ID	Respondee	Summary
45	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.2. No further comment.
53	Dr Tom Slater	Does not agree with Table 3.2. Empty homes should be made available.
67	Gladman Developments (Simon Dean)	Agree with Table 3.2. Would wish to see that the wording, particularly in paragraph 3.10 remains as shown in the draft. Currently, the 'outwith-SDA' requirements set out in table 3.2 are referred to as 'suggestions' and the levels are described as 'indications'. This approach is consistent with the flexibility requirements of SESplan (specifically policies 6 and 7), SPP and draft SPP. The wording in paragraph 3.11 reinforces this and should not be diluted.
80	SEPA (Mr Paul Lewis)	SEPA cannot answer these questions confidently until an SFRA is completed and the distribution of housing land identified in Table 3.1 tested against it. Flooding and water management is of concern.
86	Musselburgh Conservation Society (Mr Barry Turner)	Agree with the Outwith SDA's section of Table 3.2.
102	Mr Grant McCulloch	Does not agree with the Outwith SDA allowances. The extra should be proportionate across the whole SESplan area, and not restricted to these 3 areas.
115	Murieston Community Council (Mr Davidson McQuarrie)	Does not agree with the Outwith SDA allowances. These allowances should be better defined as the SDAs.
133	Banks Group (Mr Alistair Landells)	Agrees with Table 3.2.
138	Cruden homes / Land Options East	Have no disagreement in principle to the additional allowances which have been identified outwith the SDAs but question the wisdom of confining such allowances to the City of Edinburgh, Fife and the Scottish Borders Council Areas. There are many small sites throughout the SESplan area which are capable of contributing towards the strategic housing land supply and would help to maintain the required five year supply of effective housing land. Major strategic sites are slow to deliver and need to be supplemented by smaller and more immediately deliverable sites such as those at Gullane. Such sites would also ensure a greater choice and range of house building opportunities across the area. It is suggested that additional allowances be identified outwith SDAs for not only East Lothian but also Midlothian and West Lothian.
141	Mr Alan Harrison	Does not agree with the Outwith SDA Allowances in Table 3.2. See Response 140.
147	Dr Simon Jackson	Does not agree with the Outwith SDA Allowances in Table 3.2. See Response 145.
167	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Agree with Outwith SDA Allowances in Table 3.2, but consider they are not enough. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
173	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.2. Content, subject to your responses to questions 5 and 6 (Responses 174 and 175)

Response ID	Respondee	Summary
180	Mansell Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.
186	TMS Planning Services	The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.

Response ID	Respondee	Summary
192	Campion Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
198	Muir Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
211	Aithrie Estates	Does not agree with Table 3.2. The inclusion of an additional 2,500 homes in Edinburgh is inappropriate. It will lead to further pressure to develop on present Green Belt. There is no Green Belt in West Lothian.
218	Strawson Property	Agree with the Outwith SDA's section of Table 3.2.
226	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.2. See also the response to Question 7 for further comment (Response 223).
236	The Cockburn Association (Ms Marion Williams)	Does not agree with Table 3.2. City of Edinburgh Outwith SDA - SSAs 9 and 11 - An additional 2500 units. How is this to be achieved without serious damage to the environment. Development in these locations is a departure from the concept of the SDP as approved by Ministers which sees the thirteen SDAs as the "primary locations for growth and development". There will be unacceptable implications for the Green Belt.
245	Kalewater Community Council	Agree with Table 3.2.

Response ID	Respondee	Summary
255	Haddington and District Amenity Society (HADAS) (Chairperson)	Nothing to add. See Response 253.
263	Barratt and David Wilson Homes	Does not agree with Table 3.2. Whilst a significant improvement, the allowances for Edinburgh should be increased further in terms of North-West /South-West as more marketable (and hence deliverable) locations than part of Fife's additional provision. Planned expansion of Rural West settlements aligned to improved bus service connections to rail and tram links should be embraced given proximity to employment / services in West Edinburgh. Supporting document submitted.
266	Historic Scotland	Historic Scotland has no specific comments to make in relation to the actual breakdown and distribution of the additional allowances within or outwith the SDA's. Would note that the allocation of additional housing land within the SESplan area increases the potential for impacts on the historic environment which will require to be reviewed during the site allocation process by the relevant Local Authorities in the preparation of their LDP's.
276	Dr David Malton	Does not agree with Table 3.2. Fife has been disproportionately targeted. Small villages will be negatively economically impacted by development. Aberdour relies on it's beauty to attract visitors, not traffic and sprawling developments.
284	Mr Thomson	Does not agree with Table 3.2. There is a greater need to create employment opportunities outwith Edinburgh. See Responses 283, 285 and 286.
296	Balerno Community Council (Mr Richard Henderson)	Does not agree with Table 3.2. Development outwith SDAs by definition cannot be strategic. If such development is deemed necessary then it must be sustainable. The criteria for assessing suitability for further development clearly show South West Edinburgh to be unsuitable. Balerno and Currie have access to only one train station which is currently restricted. The A70 which runs through the villages is at capacity.
305	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.2. Welcomes the additional allowances outwith SDAs but understand the figures are based on Seaplane's appraisal of how much additional land can be accommodated within the SDAs. As noted in responding to Question 3 (Response 304), allocated sites within SDAs may well be constrained and their delivery stalled accordingly. Caution is required in terms of potential over-reliance on allocated sites that might not achieve delivery of new housing targets.
310	EDI Brunstane Final	Does not agree with the Outwith SDA Allowances within Table 3.2. The strategy to depart from established SDAs is not sufficiently justified. Suggest that the Outwith SDA figures should be re-appraised, with a closer examination of the SDA first principle. Maximising the capacity of the SDAs will enable demand to be met closer to where it is generated, reduce travel and better relate housing to employment opportunities.
317	Straiton Parks Ltd (Mr Rob Snowling)	Does not agree with the proposed additional allowances outwith Strategic Development Areas. Any additional allowances should be directed to the SDAs (in particular the A701 corridor) before being distributed to Local Development Plan areas outwith the SDAs.
341	Mrs Carolyn Craig	Does not agree with Table 3.2.
346	Mrs Gertrud Mallon	Does not agree with Table 3.2. The allocation for the rest of Fife (outwith SDAs) is far too big given the state of the transport network, the environmental issues (especially the impact on Landscape/Townscape, cultural heritage etc.
353	Mrs Anna Purdie	Does not agree with Table 3.2. Fife has been given a disproportionate amount of the new proposed house allocation for its landscape. The cultural heritage that the area has to offer will be lost. The transport networks will also not be able to cope with the influx of housing in the area.
359	Mr Alan Pithie	Does not agree with Table 3.2. There is clear evidence that the existing road systems within Edinburgh cannot cope with the present populations' needs. There is also a lack of facilities for these communities. No further housing allowances should be granted on the West side of Edinburgh. It would be wrong to allocate land within Cammo when are no plans to balance that removal of land with any improvement to roads and facilities.
362	Mr Kenneth Murray	Does not agree with Table 3.2. The consequences of giving into development pressure outwith SDAs will be very significant for the character of Fife villages and tourist / visitor businesses.

Response ID	Respondee	Summary
366	Ogilvie Homes	Does not agree with Table 3.2 since it seeks to place a limitation on the amount of housing land that can come forward on sites, which lie outwith the identified SDAs. In view of SDP Policy 7 there is no policy basis upon which to justify any restriction in the amount of land that can potentially come forward on sites falling outwith an SDA. The wording of paragraph 3.9 must be changed to conform with Policy 7. Fife is considered to be the least well placed to accept further growth over and above that which relates to the SDAs. The allocation set against Fife should be deleted from Table 3.2, with the allocation of 1,950 units being reallocated to more appropriate locations.
372	Ashdale Land and Property	Does not agree with Table 3.2 since it seeks to place a limitation on the amount of housing land that can come forward on sites, which lie outwith the identified SDAs. In view of SDP Policy 7 there is no policy basis upon which to justify any restriction in the amount of land that can potentially come forward on sites falling outwith an SDA. The wording of paragraph 3.9 must be changed to conform with Policy 7. Fife is considered to be the least well placed to accept further growth over and above that which relates to the SDAs. The allocation set against Fife should be deleted from Table 3.2, with the allocation of 1,950 units being reallocated to more appropriate locations.
389	Mr Patrick Mitchell	Does not agree with Table 3.2. Development is disproportionately concentrated on two areas in Edinburgh. The numbers at West Edinburgh require greenbelt land for nearly all of the housing units required.
392	Mr Michael Fenner	Does not agree with Table 3.2. The Fife outwith SDAs allowance is disproportionately high in relation to it's current population, expected demand levels and availability of suitable sites. Would suggest that allowances outwith SDAs should not be included at this time. Further suitable brownfield sites within already designated SDAs will become available to any augment any shortfall if required.
395	Mrs Caitlin Hamlett	Does not agree with Table 3.2. The proposed additional allowances have already led to an unprecedented rate of speculative planning applications in highly unsustainable locations. Paragraph 5.20 of the Technical Guidance states that South West Edinburgh (Ratho, Juniper Green, Currie, Balerno and Hermiston) has the potential to accommodate development on a strategic scale. However the criteria for assessing suitability show the area to be unsuitable.
405	Mr John Watkins	Does not agree with Table 3.2. No space available for any more development without using parks and greenbelt.
416	Juniper Green Community Council (Mr Neil Ingram)	Does not agree with the Outwith SDA Allowances within Table 3.2. The areas which would need to be developed are located away from sites which have the best infrastructure. Even developments of 100 houses would put considerable strain on existing transport links, local schools and other amenities. The best possible use should be made of brownfield sites, and any development elsewhere needs to be properly planned with adequate road and public transport provision.
424	Mr James Poseley	Does not agree with Table 3.2. There is no strong link to future employment possibilities. Surely it makes more sense to increase regional centres and areas outside of cities to support the growth of Scotland.
431	HPG Dalkeith Ltd	Does not agree with Table 3.2. It is not evident how the refresh has weighted economic and other benefits of delivery against environmental impact or how this is reflected in the distribution of additional allocations. The refresh has significant serious deficiencies and is purely qualitative, subjective and value laden. Densifying existing allocations cannot be assumed to be automatically the case. It is not evident how the principles for identifying allocations within and outwith SDAs have been undertaken.
432	Mrs Susan Warwick	Does not agree with Table 3.1. The allocation for housing units for West Edinburgh is not feasible. The road systems are at capacity.
459	Firrhill Community Council (Mr James Napier)	Does not agree with Table 3.2. Brownfield sites should be developed first and then, if necessary, consideration be given to releasing more greenfield land for housing development, within the parameters set out in the approved Edinburgh LDP.
471	Miller Homes East Scotland Ltd	Does not agree with Table 3.2. Agrees with the identification of 1,950 additional units provided that the figure is justified in terms of the HNDA. However, it will be important that these units are allocated in the right place and on sites that are effective and therefore deliverable.

Response ID	Respondee	Summary
473	Mrs Blythe Peart	Does not agree with Table 3.2. Scottish Borders allowance could be increased due to new purpose built rail link in the Borders Rail Corridor.
484	Strutt and Parker (Mr John Wright)	Agree with the Outwith SDA Allowances within Table 3.2, although the heading is misleading implying that these figures are in addition. Supportive of the identification of a requirement for delivery outwith SDAs as this will introduce a range and choice of location for housing but remain concerned about the displacement of housing away from the City.
490	Dr Caroline Richie	Does not agree with Table 3.2. Concerned that the allocation of further land for housing development in rural South West Edinburgh will result in development in unsustainable locations resulting in increased car use. This will result in further congestion on roads that are at capacity.
491	Dr Caroline Richie	Duplicate response. See Response 490.
498	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.2. The numbers are not clearly justified. On what basis has the reprogramming of brownfield land in Edinburgh taken place? There is no evidence to state how the constrained supply has been calculated. If aiming to deliver a generous supply the housing land requirement should be higher by up to 20%.
503	Miss Sally McKenzie	Does not agree with Table 3.2. It is inconceivable that Fife has been allocated an additional allowance of 1,950 and the Scottish Borders only 80. No explanation has been given for this. Fife should receive less of the allocation considering its size compared to the Scottish Borders.
508	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.2. This approach is potentially-misleading. The SDP should simply set out the housing requirement to be met. The task of demonstrating how the requirements can be met should fall to the LDP. The Guidance makes unsubstantiated assertions about constrained sites and potential windfall contributions. Paragraph 3.9 does not accord with SDP Policy 7 as amended by Ministers.
516	Aberdour Community Council	Does not agree with Table 3.2. The figure for Fife is disproportionate. Only City of Edinburgh, Fife and Borders are included in this category – why? 80 for the whole of the Borders region is hardly worth mentioning.
523	Wallace Land Investment & Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
532	Murray Estates C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.

Response ID	Respondee	Summary
536	Hallam Land Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
543	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
549	Scottish Property Federation (Mr David Melhuish)	Agree with Table 3.2 and the direction of travel but would argue that further allowances should be identified across the region in order to compensate for shortfalls in anticipated delivery elsewhere (as is consistent with SPP).
554	Ashfield Commercial Properties Ltd	No Response.
560	Mr Nick Lansdell	Does not agree with Table 3.2. Developers are interested in developing premium housing in what is seen as highly marketable areas. This leaves other areas, who might otherwise benefit economically, undeveloped. It also creates pressure hotspots on infrastructure and diminishes quality of life in those areas.
568	Morrison	Does not agree with Table 3.2. Additional space should and must be found to avoid building on Green Belt Land in the SDAs particularly West Edinburgh and the Green Belt in Cammo. There must be more effort made to absorb, create and include development sites within the City.
575	Mrs Christine Briffitt	Does not agree with Table 3.2. The allocation for Fife Outwith SDAs is far too big given the state of the transport network and the environmental issues. Assessment of the traffic situation was a desk exercise. Amenities in the Aberdour part of Fife will not support an increase of housing as they are already stretched and poorly funded. Allocation of building land within Fife on Areas of Special Landscape Value will have a negative impact on the whole region.
579	Mr Archibald Clark	Does not agree with Table 3.2. A generous amount of land has already been identified under the Edinburgh LDP. Because developers dictate what are 'effective' sites, we are seeing a haphazard sprawl of housing that means that travel distances become extended in order to go to work, to shop, or to participate in leisure activities. Attention should be focused on developing existing brownfield land.
590	Cadzow Estate	Does not agree with Table 3.2. The proposed allocation of additional allowances appears to be contrary to established planning policy in that it has allocated in excess of 20% of the sites outwith SDAs. In addition to this West Lothian is allocated fewer allowances than West Edinburgh, Fife and East Lothian.
Question 5 - Is the distribution of the housing land requirement including additional allowances, over the period to 2024, shown in Tables 3.1 and 3.2 of the Supplementary Guidance, deliverable? Please set out any comments.		
16	Alfred Stewart Properties	Not deliverable. Should not expect constrained land to be fully delivered in plan period. Actual existing supply of housing land is smaller than set out in Technical Note. Housing Land Audit figures are flawed. No demand for flatted development at Edinburgh Waterfront and it is not a marketable location. Concern also over delivery of Blindwells and East Broxburn.
22	Regenco	Not deliverable. Should not expect constrained land to be fully delivered in plan period. Actual existing supply of housing land is smaller than set out in Technical Note. Housing Land Audit figures are flawed. No demand for flatted development at Edinburgh Waterfront and it is not a marketable location. Concern also over delivery of Blindwells and East Broxburn.

Response ID	Respondee	Summary
30	Liberton CC	Yes deliverable but insufficient road capacity to support housing in South East Edinburgh SDA.
34	Craigshill CC	Yes deliverable
37	Milesmark and Baldrige CC	Not deliverable due to lack of school and road investment in Dunfermline area.
46	SNH	Yes deliverable
54	Dr Tom Slater	Not deliverable in current economic environment.
60	Mr Scott Mackenzie	Yes deliverable and will create employment.
68	Gladman	Yes deliverable subject to reassessment of land supply and LDP preparation as required by SG.
77	SEPA	Flood risk should be addressed at the early stages of plan preparation.
87	Musselburgh Conservation Society	The requirement is not deliverable as developers are not deliver existing sites. In East Lothian there are infrastructure capacity issues and environmental constraints that will restrict development.
99	Cllr Dave Dempsey	No. Housing will be delivered if housebuilders see it in their best interests to deliver it. That will depend on economic factors, political decisions and a whole host of other things that no-one has foreseen.
106	Mr Grant McCulloch	Required development rates to meet requirement are not attainable. This is evidences by the number of sites currently not being developed.
116	Murieston Community Council	No. Infrastructure should be in place before any significant development
120	Mrs Sally Chambers	Current rates show that it is undeliverable.
125	Miss Carolyn Campbell	No. Question the need for further sites, such as Cammo, given the number of uncompleted sites across the city.
134	Banks Group	Given the level of investment required is clearly beyond the local authorities there would seem to be a need for a much greater level of investment from Scottish Government funding sources to allow for the provision of such essential infrastructure to be considerably greater than is the case at present. Priority should be given to within existing built up areas when allocating new sites for development
148	Dr Simon Jackson	No. West Edinburgh transport and education infrastructure cannot accommodate new development.
166	McTaggart & Mickel Homes	Yes but the additional allowances are not in the correct areas.
174	Scottish Government	Without a clear understanding of the phasing of development and infrastructure provision, the impact on the deliverability of development that may require additional infrastructure is unclear. The failure of the process so far to provide a resolution that is supported by all stakeholders and delivers a clear mechanism, or mechanisms, for addressing cross boundary transport issues and funding contributions, and a suite of interventions shown to be deliverable, at least in part by such mechanisms, means that the deliverability of the infrastructure that might be necessary to support the overall spatial strategy is questionable.
181	Mansell Homes	No due to the use of non-effective allocations. Housing development should be directed to marketable locations where people want to live.
187	TMS Planning Services	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophecy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.
193	Campion Homes	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophecy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.

Response ID	Respondee	Summary
199	Muir Homes	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophecy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.
202	Mr Peter Scott	Not deliverable. 2,500 houses at West Edinburgh are not deliverable due to transport infrastructure and education capacity constraints. The proposed solution to deal with these issues to accommodate growth will not be effective.
212	Airthrie Estates	Not deliverable. Plan making delays have led to a shortfall in delivery. Overspill from Edinburgh into Mid and East Lothian may be undeliverable. Winchburgh can accommodate and deliver further development.
219	Strawson Property	The distribution shown in Tables 3.1 and 3.2 is not deliverable over the period to 2024
225	Grange and Prestonfield Community Council	Unknown. Will required significantly higher delivery rates. Delivery of the requirements may have an unacceptable impact on the LDP.
237	Cockburn Association	Questions the delivery of land allocations because of: previous records of under achievement; uncertainty about whether HNDA is reliable; and considerable concern that a reasonable balance between housing land requirements and other important factors cannot be achieved. Currently delivery rates are significantly below those required. Required to monitor trends to ensure that environmental and landscape-sensitive areas are not prematurely or unnecessarily released for housing development.
246	Kalewater Community Council	Yes deliverable.
256	Haddington and District Amenity Society	Decisions made at appeal could have a considerable impact on specific towns and villages
264	Barratt and David Wilson Homes	Housing sites emerging through adopted LDP's will have just 3 years within which to contribute to the first demand period to 2019. Clearly, this will not deliver the pre-2019 housing numbers. The provision of new schools should be explicitly linked to housing programming to ensure that developers are not asked that new schools be in place on day one but instead, when housing programming indicates they will actually be required. New housing sites should be released now or allow housing requirements to be met.
270	Savills	No. There is an over reliance on many strategic sites which require significant infrastructure to be delivered.
271	Savills	Ensure that the principle of allowing housing development on sustainable locations is put into the document to allow additional sites to come forward over the plan period.
275	Mr Martin Bailey	The process of appeals, enquiries, etc seems not to have been taken into account. Delivery of land is only the beginning of the building process.
283	Mr Thomson	Yes if there is the will and finance to provide the infrastructure. It is not realistic to expect the developer and then the house buyer to bear the brunt of these costs.
292	Mr Jon Grounsell	The problem is not house building or land, but finance and credit.
297	Balerno Community Council	The required rate of delivery is not realistic in Edinburgh. The consequence will be half finished building sites as developers start development in order to comply with planning permissions, while delaying completions to maximise sale price.
311	EDI Brunstane	Not deliverable. The SG is drafted on the basis that a very significant increase in housing completion rates suddenly occurs, almost immediately. We question the realism of this premise, and advocate that a more pragmatic approach towards essential infrastructure improvements is needed to support the required transformation in completion rates. It is the house building industry's perception that it takes much longer to achieve planning permissions in Scotland than elsewhere in the UK, and the fact those consents are typically burdened to a greater level.
318	Straiton Parks Ltd.	The additional allowances within the A701 corridor are deliverable.
328	Mrs Ruth Schofield	Green Belt must be protected and alternative sites identified. Accessibility should be a key consideration.

Response ID	Respondee	Summary
367	Ogilvie Homes	Not deliverable. The Guidance should, on the issue of Delivery, restrict itself to considerations of meeting the assessed need and demand only. Housing should be allocated in areas where there is a demand for new housing.
373	Ashdale Land & Property	Not deliverable. The Guidance should, on the issue of Delivery, restrict itself to considerations of meeting the assessed need and demand only. Housing should be allocated in areas where there is a demand for new housing.
380	Mrs Elaine Hutchison	Proposed housing completion rates have not been delivered for 20 years and are unachievable. Proposed approach could lead to half completed sites. Housing completions is only one of 50 indicators towards national objectives. Other relevant indicators are Increase the proportion of journeys to work made by public or active transport; reduce traffic congestion; and reducing Scotland's carbon footprint. Pursuing the housing indicator may prevent the achievement of others. Making housing land available should consider: the required supply of enabling infrastructure- water, sewerage and roads; the recent recession and wider economy; and housing market conditions. This Measure also takes into account of conversions of existing buildings to housing use or refurbishment of dwellings. These opportunities must be explored before considering greenbelt and/or agricultural land.
385	Mr Patrick Mitchell	Not deliverable. There is sufficient housing units granted permission for 9 years supply without providing additional land (on historic average completion levels). Level of delivery required is undeliverable. The additional allowances will encourage speculative applications around the greenbelt to fulfil this requirement, without consideration to existing infrastructure, future requirements and impact of existing residents.
398	Mrs Caitlin Hamlitt	Not deliverable. The required delivery rates are unachievable. Attempting to meet the proposed high build rates will compromise the region's ability to meet these other key National Outcomes, while achieving deliverability will necessitate house building in unsustainable locations contrary to national policy.
406	Mr Jon Watkins	Not necessary and no space in Edinburgh
409	Burnside	Not deliverable due to significant backlog. Delivering required new schools and transport infrastructure will be difficult in financial climate.
417	Juniper Green Community Council	Note deliverable. Would require development on a scale that the building industry is unlikely to be able to support.
428	Mr James Poseley	Not deliverable due to the rates required before 2015 and the infrastructure required to support development. In particular, school extensions and new schools to provide the additional pupil places required to meet development need are seen as essential and must be delivered. Infrastructure and services in Cammo are already at capacity and the proposed transport and education solutions are not sufficient.
433	HPG Dalkeith	In general terms it is considered that effectiveness and delivery have not been taken into account as part of a strategy for recovery and sustainable economic growth. Too much non effective and constrained land is identified based on historic allocations with high servicing and infrastructure costs. This will erode land values and slow the pace of development. It is already clear that interim arrangements will need to be put into place to allow the housing market to operate in advance of LDPs being adopted. It is the HPG Dalkeith view that the targets for Shawfair will be facilitated by an additional release at Cauldcoats. Furthermore the deliverability in this and other SDAs is reliant on paying for infrastructure contributions and this is unlikely to happen without greater critical mass and further investment.
444	Cramond & Barnton Community Council	2,700 dwellings at West Edinburgh is not deliverable. The proposed infrastructure improvements will not achieve a 'no net detriment' situation. The development could not financially generate sufficient funds to developed the level of infrastructure required to accommodate the development.
460	Firrhill Community Council	No evidence to show that the delivery of housing on such a scale would be achieved within those timescales.
465	Banks Group	Questions deliverability of housing requirements in Edinburgh, Fife and East Lothian.
472	Miller Homes East Scotland	Allocating sites in the interim will not prejudice developing the remainder of SDAs.
475	Mrs Blyth Peart	Yes, subject to the development at Blindwells progressing.

Response ID	Respondee	Summary
485	Strutt & Parker	No. The SG does not direct enough requirements to marketable and deliverable locations. There has been an over reliance in constrained and non-effective sites. Use of a windfall allowance is contrary to Government guidance.
494	Dr Caroline Ritchie	Development is taking place too rapidly that it does not allow for reflection on the impacts. Affordable housing requirements are not being met due to a lack of finances. Another crash would lead to uncompleted sites around the country and many reposessions.
499	Persimmon Homes East Scotland	Depends on whether effective sites are allocated in LDPs and whether the supply is generous. The requirements for Scottish Borders will not be met due to a lack of market demand. Edinburgh should meet more demand. Housing targets should be set high when coming out of a recession. Plan delays should not restrain housing numbers.
510	Stewart Milne Homes	Not deliverable. The SDP should plan for 20 years and not focus on recent delivery rates. Edinburgh's commuting patterns are unsustainable. The SPDA should seek to meet housing need where it arises to prevent exacerbation of this. The distribution of the housing requirement is not in line with market evidence , particularly in Fife and Scottish Borders. This will lead to non delivery.
518	Aberdour Community Council	No comment
524	Wallace Land Investment & Management	Confidence in the effectiveness of the future land supply is an LDP matter and should be left to each LDP to resolve, dealing with its established land supply and assessing in detail the specific sites which can be delivered over its plan period in association with the house building sector and Homes for Scotland.
533	Murray Estates	Have significant reservations as to the deliverability of the housing land requirement over the period to 2024. These are based upon the SG's failure to adequately reflect patterns of demand and housing market trends when distributing the housing land requirement and the significant and inappropriate over-reliance on constrained and windfall sites within the established housing land supply. The Scottish Borders is an example of both by having a housing requirement that is significantly in excess of need there and including constrained sites to meet this.
537	Hallam Land Management	Confidence in the effectiveness of the future land supply is an LDP matter and should be left to each LDP to resolve, dealing with its established land supply and assessing in detail the specific sites which can be delivered over its plan period in association with the house building sector and Homes for Scotland.
544	Taylor Wimpey	Have significant reservations as to the deliverability of the housing land requirement over the period to 2024. These are based upon the SG's failure to adequately reflect patterns of demand and housing market trends when distributing the housing land requirement and the significant and inappropriate over-reliance on constrained and windfall sites within the established housing land supply. The Scottish Borders is an example of both by having a housing requirement that is significantly in excess of need there and including constrained sites to meet this.
552	Scottish Property Federation	Edinburgh Waterfront will not deliver as envisaged. Concerned that other allocations anticipated in the Supplementary Guidance will fail to be realised and that there could be a requirement for expansion in the corridor within/between Edinburgh and West Lothian alongside public transport links. There is already expected to be significant expansion in Midlothian but this may need to be revisited in conjunction with the Borders in order to capitalise on the Borders railway development.
555	Ashfield Commercial Properties LTD	We support the additional allowance of 3,565 units to the East Lothian Council Strategic Development Area (SDA) . We do, however, consider that there needs to be further flexibility with this additional allowance and that East Lothian Council will need to 'increase their allowance' to take some further units from the City of Edinburgh which is more constrained in policy and physical terms. Goshen Farm could significantly assist East Lothian Council in meeting this. It is of a sufficient scale to provide the required infrastructure and is sustainable sites.

Response ID	Respondee	Summary
561	Mr Nick Lansdell	Not deliverable. Liaise with local communities and Community Councils to ensure that development is sympathetic to local need and concern. Ensure concerns regarding greenfield development, infrastructure pressure and quality life are met. Ensure that economic land is not given up for short term housing gain. Ensure that local authorities are monitored and moderated and that conflicts of interest between planning matters and land ownership are removed in the case of Council own land. Promote small scale development. Actively promote development in those areas which will benefit economically and promote transformation planning which is green and sustainable. Actively promote affordable housing and encourage developers away from focusing on premium development.
569	Mr Morrison	The Cammo site should not be developed. The cumulative effect with other West Edinburgh sites will not be able to be accommodated by the transport network and education provision.
580	Mr Archibald Clark	The finance is not available to achieve the required delivery rates. Factory constructed, component development could lead to quicker rates of construction rather than traditional methods. This could allow for taller developments up to 8 storeys.
591	Cadzow Estate	Not deliverable. The use of constrained sites will inhibit delivery and do not reflect areas of demand. West Lothian can deliver more homes, specifically the marketable eastern parts of West Lothian. Sites in West Lothian are not as deliverable.
595	I&H Brown Limited	Seek that the SG is very clear in steering the local authorities on the importance of securing the strategic land allocations first and delivering any additional allocations only in locations which do not undermine the existing SLA's. Support development of the Dunfermline Strategic Land Allocations.
Question 6 - What can SESplan, the key agencies, developers and Scottish Government do to facilitate delivery of the strategic housing land requirement?		
17	Alfred Stewart Properties	Strategic villages such as Crossford to the west of Dunfermline could accommodate significant growth with no impact on the proposed green belt for Dunfermline.
23	Regenco	Winchburgh has the environmental capacity to expand to the south using a discrete masterplanned approach taking into account local environmental factors and has demonstrated deliverability of development.
31	Liberton CC	All bodies should be involved in delivering road capacity to allow mitigate impact of development in and around Edinburgh.
38	Milesmark and Baldrige CC	Vacant property and land in Dunfermline Town Centre should be developed.
47	SNH	Can support through: assisting in delivery of green infrastructure in development; and supporting LDP, masterplan and development brief preparation.
55	Dr Tom Slater	Start again free of vested interests.
61	Mr Scott Mackenzie	Housing should be built to the highest efficiency and design standards.
69	Gladman	LDP preparation should not be delayed. 5 year land supplies must be maintained at all times. Infrastructure providers must be proactive in their roles to support development, including education authorities who should not use education capacity to restrict development.
76	SEPA	SEPA wishes to participate with SESplan, including on green networks and preparing a flood risk assessment.
88	Musselburgh Conservation Society	1. A commitment now to all the related transport and infrastructure improvements that are necessary to support the level of development proposed. 2. Clear and fair mechanisms put in place to require developers to contribute to the above. 3. Part of increased land values brought about by planning decisions to accrue to the state/local authorities for infrastructure provision. 4. Stop land-banking by imposing harsh financial penalties on developers who do it. 5. Significant increase in social housing provision. 6. Use compulsory purchase powers where allocated land is not coming forward for development.
94	Roslin & Bilston Community Council	Development should create pleasant environments. Each should be considered as if it were on decision makers doorsteps.

Response ID	Respondee	Summary
100	Cllr Dave Dempsey	This is an exercise being carried out by a small group of professionals without reference to the public whose lives will be affected by it
107	Mr Grant McCulloch	Need for a reappraisal of what Edinburgh people want. Development of existing sites should be incentivised. Protect the Green Belt.
117	Murieston Community Council	Scottish Government and developers must underwrite the necessary changes to the transport and strategic infrastructure.
121	Mrs Sally Chambers	Incentivise developers to deliver existing sites.
126	Miss Carolyn Campbell	Plans should enhance Edinburgh.
135	Banks Group	Need for innovative funding solutions for infrastructure. This should include TIF or similar.
142	Mr Alan Harrison	No. Incentivise brownfield development. Green belt, such as Cammo, should be preserved. It is home to many flora and fauna. Green Belt helps improve the environment for the local and adjacent communities. For anyone visiting the area it gives an excellent perception of the city.
149	Dr Simon Jackson	Brownfield sites should be developed. West Edinburgh should be developed near tram network.
151	Mr Colin Mackay	Within East Lothian West, consider further sites that do not adversely affect the area concentrated around Wallyford. Give greater weight to Blindwells. Consider the Cockenzie power station site as a significant brownfield site which could include the east most lagoon area at Prestongrange
165	McTaggart & Mickel Homes	The Scottish Government, SESPLAN and Local Authorities need to assist in the provision of infrastructure to deliver new housing. This should involve up front funding. LDP allocations need to be deliverable by the market.
175	Scottish Government	Transport Scotland would be in a position to engage with authorities to identify what mitigation might be appropriate to address the impact on the strategic transport network. It would then be possible to consider phasing of this mitigation, the levels of detriment that might be appropriate and to take an informed view on how cumulative impacts might be addressed through appropriate delivery mechanisms.
182	Mansell Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
188	TMS Planning Services	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
194	Campion Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
200	Muir Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
213	Airthrie Estates	a) adjust the distribution proposed to favour areas of proven delivery, such as the east of West Lothian; b) make a specific allocation of additional land for the Winchburgh area; c) revisit the alleged infrastructure difficulties in the growth areas of West Lothian; d) accept the need to find a policy response to the qualitative dimension of need; e) looking to the post 2019 period, propose an Edinburgh City Region masterplan similar to those of proven longevity in several Scandinavian cities and historically around London; and f) speed up the review of SESplan
220	Strawson Property	1 Reassign the number of units to the East Lothian SDA as requested in these responses to meet demand and increase the prospects of a quicker recovery in the housing market within the SESplan area.2 Where brownfield opportunities are insufficient in any SDA, allocate greenfield sites in LDPs which adjoin the built-up areas of settlements. Owners or parties having control of these sites should be asked to demonstrate that the sites are effective and capable of delivering Housing units within the first period of the SDP i.e. up to 2019.
224	Grange and Prestonfield Community Council	Question the reason for delivering the strategic land requirement.

Response ID	Respondee	Summary
238	Cockburn Association	Need to deliver higher densities and the smaller dwelling types as required by the HNDA. This should be enforced through development management policies.
247	Kalewater Community Council	Build houses where there is a local need and not for the convenience of developers.
257	Haddington and District Amenity Society	1 Provide greater support for local authorities to review and consider the capacity of their areas before final decisions on housing numbers approved. 2 Block the ability of developers to gain approvals by appeal for non- determination. 3 Allow for further reviews of infrastructure requirements across the Plan area and not just considering requirements within individual local authority areas. There are significant links and co-ordinated improvements that could be made. Infrastructure requirements should also extend to consider the impact on existing Town centres. 4 Supporting Town Centres and the structure and operation of existing settlements must be linked to any decisions for new housing allocations. 5 Ensure process does not allow developments to come forward in piecemeal manner without suitable infrastructure improvements in place.
265	Barratt and David Wilson Homes	Failure to meet housing demand in the past has had implications for the scale of housing need over the next 10-20 years. Many large scale sites with infrastructure requirements have not delivered. Cannot wait until LDPs are adopted. In order to meet supply requirement interim guidance, such as in East Lothian, should be adopted. Local authorities and developers working together on bringing sites forward through interim guidance is far more advantageous and a better use of resources than a continued 'planning by appeal' approach.
277	Mr Martin Bailey	Fair and proper consultation to explain why the SESplan is necessary. Secondly, to offer land owners generous terms.
280	Dr David Mallon	Coastal villages should not be identified for new development.
288	Yeoman McAllister Architects	Many housing allocations do not take economic factors into account. Greater housing generosity, in and around the airport and Edinburgh's villages to the west will help facilitate the delivery of houses.
294	Mr Jon Grounsell	Delivery is dependent on finance and not land supply.
299	Balerno Community Council	There is a requirement for leadership by Scottish Government in particular rather than an unfortunate impression of abdication of responsibility. If Government wishes to abandon the Green Belt then it should say so; If not, and we have no reason to believe that it does, then it should stand up and say so.
303	Trustees of the Foxhall Trust	Consideration should be given to allowing preference to sites with identified market demand and to those that meet the effectiveness tests. Overestimation of the potential of the effective supply should be avoided.
312	EDI Brunstane	Further pragmatic and detailed dialogue with the SDPA an LPAs on delivery issues, up front infrastructure funding and provision of early phase works through funding that can be reimbursed by unit phases.
319	Straiton Parks Ltd.	SESplan, Key Agencies and Member Authorities can facilitate delivery of the strategic housing land requirement by taking a lead role in facilitating strategic infrastructure deliver. This infrastructure should be forward funded. Local Development Plans should be seen as business plans which demonstrate how enabling public investment can be used to attract private investment to an area and deliver growth.
329	Mrs Ruth Schofield	Consideration needs to be given to transport infrastructure, carbon footprint and the delivery rates of development. Is there a market for all these houses?
368	Ogilvie Homes	Development Plans must take account of what infrastructure can be delivered by the development industry. Developer contributions must be proportionate. As local authorities benefit from development they should fund infrastructure.
374	Ashdale Land & Property	Development Plans must take account of what infrastructure can be delivered by the development industry. Developer contributions must be proportionate. As local authorities benefit from development they should fund infrastructure.
381	Mrs Elaine Hutchison	Ensure housing land is in sustainable locations with the required infrastructure, meets all the desired National Outcome criteria as well as the planning principles
387	Mr Patrick Mitchell	More needs to be done to encourage brownfield developments. The current system encourages land banking.

Response ID	Respondee	Summary
399	Mrs Caitlin Hamlitt	Ensure that housing land is in sustainable locations in line with national planning policy, and that it meets all the desired National Outcome criteria. This will increase certainty for developers and communities and reduce the time and resource required for planning appeals.
407	Mr Jon Watkins	Need to justify need for housing and explain where matching jobs are.
411	Burnside	Infrastructure must be in place before development. Housing must be located where it is needed. Piecemeal development of large houses in unsustainable locations, such as Balerno, should not be supported. Developers must increase the housebuilding rate.
418	Juniper Green Community Council	Need to review housing need levels and the availability of all existing proposed sites, both brownfield and planned greenfield.
434	HPG Dalkeith	The SG must identify a generous supply of effective land in marketable areas where there is infrastructure capacity or this can be provided in accordance with Policy 7. The interim guidance provided by East Lothian and Fife is useful in this regard. Developers will respond to investment opportunities where these are well located and can be delivered in accordance with market demand. Where infrastructure constraints adversely affect land values without any public support the land will become unviable and ineffective. Agencies need to prioritise their Action Plan programmes and orientate these towards facilitating investment in preferred areas rather than spreading the budget too thinly.
435	Mr James Poseley	Plan should be started again with development focussed away from Green Belt and cities and towards growing regional towns and other areas.
445	Cramond & Barnton Community Council	Introduce a Land Tax on undeveloped brownfield sites. Provide the necessary infrastructure improvement funding, do not rely on this being achieved by development gain monies,
461	Firrhill Community Council	Scottish government and councils should promote and incentivise the development of brownfield sites.
474	Miller Homes East Scotland	Local authorities should work with developers when preparing plans. Allocated smaller sites unburdened by infrastructure requirements. Match public and private sector investment in infrastructure to deliver larger sites.
477	Mrs Blyth Peart	No comment.
486	Strutt & Parker	Allocate land in areas of need and demand. Identify, acknowledge, and resolve barriers and constraints to development rather than, as has been done here, avoiding them.
492	Dr Caroline Ritchie	The development of brownfield sites should be incentivised. Public sector land that is not required should be developed. The Government should increase the funding for social housing. Developers should not waste time and money by submitting applications that are contrary to government and plan aims.
500	Persimmon Homes East Scotland	Identify a generous land supply in the right places. Identify infrastructure funding solutions. Have can do attitude and allocate a generous supply of housing to meet the aspirations of a growing capital city. If SESplan and LDPs don't do this then the Scottish Government should. Key agencies to take the long term view on identifying infrastructure requirements.
504	Miss Sally Mackenzie	Consider using empty homes to meet need and develop brownfield sites.
511	Stewart Milne Homes	Housing need should be met where people want to live. Infrastructure investment costs should be shared between the public sector and the development industry. Development Plans should in effect be business plans showing how private investment can be attracted to an area with the assistance of enabling public investment.
520	Aberdour Community Council	Consult with appropriate experts in their fields, communicate and work as a team
525	Wallace Land Investment & Management	The inner boundary of the Edinburgh Green Belt should redefined in line with SPP. The additional capacity in East Lothian compared to previous positions is not explained.
535	Murray Estates	Allowances should be directed to where demand and need arise. Constrained sites in the allowances should be replaced with new effective sites in strong market locations. The refresh of the spatial strategy assessment contains little justification why West Edinburgh could not accommodate further development. Developing the Garden District would be more effective than redistributing the housing requirement further away in other local authority areas.

Response ID	Respondee	Summary
538	Hallam Land Management	The inner boundary of the Edinburgh Green Belt should be redefined in line with SPP. The additional capacity in East Lothian compared to previous positions is not explained.
545	Taylor Wimpey	Allowances should be directed to where demand and need arise. Constrained sites in the allowances should be replaced with new effective sites in strong market locations. Edinburgh, Midlothian and East Lothian have better prospects of housing delivery than Scottish Borders, which does not seem capable of delivering its requirement. The reasonable alternative sites in Midlothian are capable of delivery in the plan period.
556	Ashfield Commercial Properties LTD	Identify sites that are capable of delivery in the short to medium term and that are not burdened with overly restrictive infrastructure requirements or costs.
557	Scottish Property Federation	1. Review Edinburgh Waterfront with the consequences for non-delivery of its allocation acted on. 2. Push forward key public transport initiatives such as a new station in the Winchburgh development that is being delivered to market. 3. Agencies and Scottish Government should (continue) to pump prime infrastructure developments or improvements in key sites. Education and Transport appear to be the major constraints. A continued policy of seeking to phase where possible such infrastructure requirements would appear to be a sensible way forward.
562	Mr Nick Lansdell	Same as 562
570	Mr Morrison	Brownfield development should be prioritised and incentivised in preference to green belt and green field development.
581	Mr Archibald Clark	Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Scottish Government is the key agency that bears this responsibility yet it appears to be leaving it to local authorities and developers to provide the allegedly needed housing - without having first decided how much good quality agricultural land must be retained to support the nation. There is an obligation on the Scottish Government to make that decision first before deciding the extent to which any built-up area can expand.
592	Cadzow Estate	SESP can comply with planning policy and adopting a realistic assessment of need and demand with which to inform the policies adopted to guide the supply of that demand. Adopt a flexible position towards land supply.
593	I&H Brown Limited	The further allocation of sites would have the potential to undermine some of the existing allocations which are crucial for the delivery of the associated infrastructure and strategic goals. In this context it is essential that forthcoming LDP's do not undermine the strategic allocations with early allocations of new sites outwith the strategic land allocations SLA's.
Question 7 - Are there any further comments on the draft Supplementary Guidance you would like us to consider?		
8	Sports Scotland	Sports Scotland have a toolkit to help in plan making
10	Dr Gray	Flaw with HNDA use of trends and assumptions. The projected figures are not supported by past trends. Will lead to development of greenfield sites; Chosen strategy will lead to ribbon development from Midlothian through to Edinburgh City Centre.
18	Alfred Stewart Properties	Supplementary Guidance should specifically identify the Dunfermline Western Villages as a strategic location capable of accommodating additional growth
24	Regenco	Supports the ongoing identification of Winchburgh as a strategic development location
25	Liberton CC	SG should show breakdown of 2024-2032 housing need by member authority. Online questionnaire is too limited.
48	SNH	Support the design led approach.
49	Mr Mike Martin	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.

Response ID	Respondee	Summary
56	Dr Tom Slater	There is no evidence that building lots of housing will contribute to sustainable economic growth - in fact, quite the opposite. The SESplan reflects the imbalance of decision-making power in the post-2006 Scottish local planning system in which the odds are stacked heavily in favour of developers and against the wishes of local communities.
62	Mr Scott Mackenzie	No further comment
64	Mrs Pauline McKenzie	Balerno is not a sustainable location for development due to transport capacity, congestion and green belt issues.
71	Gladman	In order to meet need, permission should be granted for sites in advance of LDP preparation. Historic under delivery should be brought forward and future under delivery should be factored into later in the plan period.
79	SEPA	Willingness to work with SESplan on flood risk and other issues.
81	Scottish Water	No comment
89	Musselburgh Conservation Society	No further comment.
90	Mr Alan Coupe	Fundamental principle of the Green Belt should be defended. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.
91	Mrs Beryl Moncrieff	There green belt must be protected. There are sufficient brownfield sites in Edinburgh that should be developed. Transport infrastructure in Balerno cannot accommodate further development.
96	Mr James Loftus	Green Belt should be preserved and not developed for commercial gain. Brownfield sites should be developed. Developing Green Belt will result in irreversible damage to the environment , biodiversity, wildlife and the loss of productive farm land. Balerno's traffic infrastructure cannot accommodate development as it is already congested.
101	Cllr Dave Dempsey	No comment
109	Upper Tweed Community Council	Rural development should be supported by public transport improvements and broadband access. Affordable Housing requirements should be lowered to enable development.
110	Mr D Allan	Green Belt must not be encroached on. Currie and Balerno are already traffic congested and links cannot be significantly improved to accommodate development.
111	Coal Authority	No specific comment
118	Murieston Community Council	SG should show split between existing LDPs and new housing demand. The main demand outwith City of Edinburgh is for affordable housing to meet the needs of the local communities. Exporting out the housing allocations from City of Edinburgh to these other SDAs leads to the eventual housing build being skewed towards providing large, expensive houses mainly purchased by families moving out of Edinburgh and does not serve the actual real needs of the local communities.
127	Miss Carolyn Campbell	Questions the need for and distribution of houses across Edinburgh
136	Banks Group	Need for call for sites encouragement as part of LDP process.
137	Mr Alexander Valentine	Green Belt should not be risked, especially when there are so many brownfield sites awaiting development. A need for housing should first be met by looking at abandoned properties and sites and also brownfield sites. Communities need to have a greater say in such developments rather than just profit driven developers. There are many reasons for preserving green belt land which include the following: environmental and conservation purposes, valuable agricultural land, unique landscapes and amenity benefits, preventing loss of community identity. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning and SESplan SDP aims.
143	Mr Alan Harrison	Develop derelict land.
144	Dr Simon Jackson	SESplan should not use green field sites until ALL brownfield sites have been exhausted

Response ID	Respondee	Summary
150	Mr James Hardie	Land at Cammo should not be developed as there is no capacity in the transport network and in education capacity. The amenity, landscape, setting and environment of the Cammo estate would be negatively effected.
152	Mr Finlay Lockie	SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
153	Mr T Mann	The park land of Hill Side school between Easter and Wester Aberdour and the grassland beside the harbour are vital elements in the unique character of the village.
164	McTaggart & Mickel Homes	City of Edinburgh Council has failed to plan for its expanding population and has required surrounding Local Authority areas to accommodate its housing land supply. City of Edinburgh Council must now make, admittedly, difficult decisions, to provide the supply of housing required to provide a range and choice of housing opportunities. Not providing an appropriate level of housing development encourages commuting and unsustainable development caused by leapfrogging of the Green Belt. Supply needs to be met where the housing demand is greatest. There is no evidence within the guidance or the technical note of an assessment capacities and infrastructure or whether a more appropriate planning solution would be for a greater amount of housing supply being provided in the area where the demand arises i.e. within the City of Edinburgh. There is no acknowledgement that housing plays an important role in a growing economy. Increasing density does not deliver attractive and sustainable developments. A large development should be allocated at the Gilmerton Station Road in the Edinburgh LDP. There is a lack of analysis in the Technical Note of the South East Edinburgh SDA. The level of housing expected to come forward from constrained sites is over estimated.
169	Mr Andrew Naylor	It essential to preserve and reinforce the existing boundaries of Green Belt land. It prevents sprawl, encourage biodiversity and offers leisure and recreation opportunities. Balerno cannot accommodate further development due to infrastructure capacity issues, including transport. Brownfield sites in Edinburgh should be developed instead.
176	Scottish Government	No further comment.
203	Mr Peter Scott	Developing the Garden District with housing and infrastructure would reduce the need for further housing in West Edinburgh. This would reduce pressure on transport infrastructure in this area.
214	Airthrie Estates	Winchburgh can accommodate further development. This area is supported by transport connections and available infrastructure capacity.
221	Strawson Property	No further comment.
222	Mr Pam Mackay	Scottish Government incentives / requirements for the development of existing brownfield sites would develop city centre sites, improve these areas, and protect the Greenbelt boundaries which contribute to the environmental qualities of the City. The Cammo fields are home to a great deal of wildlife, much of it endangered

Response ID	Respondee	Summary
223	Grange and Prestonfield Community Council	The consequences if the implied rate of housing completion is not achieved could be scattered piecemeal housing development and infrastructure provision in the wrong place with a consequential waste of financial and other resources. Consider lower rates of housing growth try to minimise these risks and ensure that as far as possible actual new housing and infrastructure provision are properly integrated over a range of possible economic scenarios. We therefore are concerned that the existing LDP safeguards and provisions about the green belt and open spaces may be inadequate to withstand the onslaught implied by the SG itself. We think that development should be LDP led and not Appeal led and we fear that local concerns are being swamped by a top-down policy which may prove to be unrealistic.
239	Cockburn Association	No further comments
241	Mrs Linda Allison	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.
248	Kalewater Community Council	There is a need to match new housing with jobs in rural areas.
249	Mr Ian Sandison	Land south of Cockburn Crescent, Balerno should not be developed as this would contradict with the aims of the plan. This is because; agricultural land will be lost; Cockburn Crescent is the clear boundary between Balerno and the Regional Park. Breaching this boundary would create a dangerous precedent; development will exacerbate existing infrastructure deficits; Balerno is the least accessible area in Edinburgh to employment; and existing traffic congestion will worsen.
258	Haddington and District Amenity Society	No further comments
282	Mr Martin Bailey	1. Democratic Deficit. Pre Christmas consultation period was not appropriate. 2. The language of the documents is impenetrable. 3. No clear explanation of the methodologies used, especially relating to previous exercises. 4 There seems scant attention paid to the environmental impacts of the various proposals. 5. No attention paid to the preservation or enhancement of the many beautiful and historic towns, villages, stretches of countryside, that seem to be threatened by over-development. 6. The balance between public and private finance of new housing is not clear. 7. What extent is requirement of 155k houses a catching-up exercise to cope with perceived inadequacies of supply? 8. The implications of independence are not discussed.
289	Yeoman McAllister Architects	Should consider sites where housebuilders are keen to develop, such as Ratho.
298	Mr Jon Grounsell	This plan is completely unsustainable as it knowingly increases traffic impacts and infrastructure costs. Demand is down and we need less land supply, not more, quite the opposite of what is proposed here.
300	Balerno Community Council	If Government truly 'value and enjoy our built and natural environment' then it will reject the housing requirement as unnecessary and unrealistic. If government truly also believe that we must 'reduce the local and global environmental impact of our consumption and production', then it will recognize that destruction of the diminishing pool of prime agricultural land is the antithesis of sustainability. If Government truly believes that 'we should live in well designed sustainable places' it would recognize that requiring housing development without access to good infrastructure and transport risks traffic congestion, increased pollution and longer journey to work times. In general terms this housing requirement would lead in the opposite direction to the claimed goal. In summary the Housing requirement will achieve precisely the opposite effect to that which Government apparently wishes to achieve.
313	EDI Brunstane	Brunstane can play a strategic part in providing the additional allowance proposed by the draft SG in the South East Edinburgh SDA (2,500 units), as part of a comprehensive green belt release. In accordance with SPP, we consider it is entirely appropriate for the SDPA to establish the need for a green belt and identify its broad area, which will support a sustainable distribution of growth. Further, Brunstane could play a role in satisfying increased additional allowances which we consider should be brought forward in the South East Edinburgh SDA as an established priority location, this being a more sustainable strategy than locating 4,530 units outwith SDAs. The assumed land supply of 83,207 units is questioned.

Response ID	Respondee	Summary
320	Mr Douglas Allison	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should aim to meet government planning aims.
321	Mr Dario Bianco	Principles of Green Belt must be defended. Balerno has insufficient transport infrastructure and is the least accessible part of Edinburgh. New developments must be allowed but only in a balanced, sustainable and community enhancing manner. Short term commercial development interests must not be permitted to hijack these long term sustainability policies.
322	Mr Clive Hembury	Prime agricultural land should be defended for the long term benefits it brings. Brownfield sites should be developed. Transport infrastructure in Balerno cannot accommodate further development. Building on green belt land will only result in the steady unsustainable decline in our green (and vital) spaces.
323	Portobello Community Council	Concerned that identifying all the additional greenfield/Greenbelt sites to meet housing requirements could undermine Brownfield regeneration.
324	Dr Quitin Bradshaw	Green Belt protects the countryside from urban sprawl. Development should be accommodated with the city limits which have high public transport accessibility. Brownfield sites should be developed first. Balerno's roads are congested and the transport network cannot accommodate new development. Developing out of town green belt sites will not meet government aims.
330	Mrs Ruth Schofield	By allocating greenbelt land to build on we will: 1 Negatively impact our future environment; 2 Negatively affect our transport and infrastructure; 3 Negatively affect the availability of prime agricultural land; and 4 Negatively impact our integrity as decision would go against underlying principles of the Council Planning.
331	Miss Kirsten Bradshaw	Green Belts must be protected. The Lanark Road is at capacity and further traffic may affect safety. Whilst there is a need for more housing, there is also the need to protect Green Belts. Brownfield sites should be developed.
332	Mr Rory Bradshaw	Green Belt round cities should be protected. Balerno is the least accessible location in Edinburgh and it's transport infrastructure could not accommodate further development. Accessible brownfield sites should be developed instead.
333	Dr Fiona Bradshaw	Green Belt should be protected from development. It instead should be directed to accessible brownfield sites. Balerno is not accessible to jobs the transport and education infrastructure are at capacity. Government aims should be to protect the environment whilst supporting communities and improving our nation. Destroying the green belt would only support the developers .
334	Mr Frank Phillips	The real need is for sustainable housing in areas where the environmental impact can be minimised having due regard for employment opportunities, low carbon travel and easy access to shops, health services, schools etc. The Green Belt around Balerno should not be developed as this would result in the loss of a desirable resource.
335	Mrs Mary Taylor	Opposed to development in Aberdour. It would lead to a loss of identity and impact on the character of the village. The road network is insufficient to accommodate further development.
336	McEwan	Green Belt around the Pentlands should be protected. Development in Balerno would lead to more sustainable out-commuting. Junctions on the Lanark Road are congested.
337	Ms Adele Shields	The Green Belt around Balerno should be protected. Balerno is the least accessible area to employment in Edinburgh. The Lanark Road is congested and transport infrastructure could not sustainably accommodate further development.
343	Mr Ewing Grainger	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should aim to meet government planning aims.
347	Mrs Gertrud Mallon	The Fife Outside SDAs allowance should be lowered. Coastal Villages should be protected. The Consultation Portal is not user friendly.
348	Lynn Mann	The Pentlands Green Belt must be protected for agriculture and amenity. There are sufficient brownfield sites within Edinburgh. Housing needs should be met in more sustainable locations.

Response ID	Respondee	Summary
349	Mrs Andrew Veitch	Land south of Cockburn Crescent, Balerno should not be developed. The character of the village would be affected. It would contradict aims of the plan. The one road out of Balerno is congested and cannot accommodate further development. Additionally, the local services e.g. health, education can in no way accommodate such prospective additional numbers. The sewage system would need to be complete upgraded. Green Belt should be protected and brownfield sites developed instead.
354	Mrs Anna Purdie	Fife (outwith the strategic development area) should have the proposed allocation of houses lowered. The cultural heritage and the coastal villages need to be preserved and the negative impact it will have on the area will be huge. The website is difficult to uses
355	Professor John Ensor	Green Belt should be protected for landscape, agriculture and community benefits. Balerno is not accessible to employment and development will lead to unsustainable travel. Development should be in accessible locations. Transport infrastructure in Balerno could not accommodate further development. Planning should be community focussed.
356	Professor John Ensor	Duplicate of 355
357	Ms Geraldine Jones	Green Belt should be protected as it prevents urban sprawl. Balerno is not a suitable place for development as it would lead to long commuting and would affect the character and amenity of the village. Development should be in sustainable locations.
358	Ms Geraldine Jones	Duplicate of 357
361	Mr Alan Pithie	Cammo residents are against the proposed development in the area. Democratic opinion should be respected.
376	Mrs Karon Gilhooley	There is sufficient brownfield land available for development in Edinburgh. Green Belt land should be protected for the environmental, agricultural and community benefits it brings.
382	Mrs Elaine Hutchison	One of the Government's 5 Strategic Objectives is to make a "Greener Scotland". Don't compromise this by allocating land for housing to meet a target that will mean that the Government's Strategic Objectives will fail: We value and enjoy our built and natural environment - bad decisions made now to meet a housing deadline could compromise our natural environment by building on greenbelt and prime agricultural land. Reduce the local and global environmental impact of our consumption and production - by building on agricultural land we are not moving towards our sustainability targets, become more self-sufficient and reducing food miles. We live in well designed sustainable places - by building in areas without access to good road infrastructure or public transport links, we are increasing the reliance on cars, increasing traffic congestion and increasing carbon dioxide emissions. By not considering the sustainability component (enhance the environment and reduce emissions) the Government will fail in its purpose to increase sustainable economic growth.
390	Mrs Genevieve MacKinlay	Green Belt must be protected for the benefits it brings. Transport infrastructure in Balerno is congested. Brownfield areas accessible to employment should be developed instead.
391	Mr Gordon MacKinlay	The Pentland Green Belt should be protected from development. Development should be located in locations accessible to employment. Wildlife would be significantly affected by Green Belt development.
394	Mr Christopher Bradshaw	The Green Belt in Balerno, and the benefits it brings, should be protected. Development in Balerno would contradict the sustainable aims of SESplan. Balerno's transport infrastructure is congested and could not accommodate further development.
400	Ms Maureen McCulloch	Housing should be in sustainable locations, close to or with good (especially public) transport links to employment/facilities. Easy to development car borne suburban developments is out of step with climate change and carbon reduction targets. Green Belt should be protected in South West Edinburgh and not replaced by 'stepford' type housing developments. The Lanark Road is already congested.
401	Mrs Caitlin Hamlitt	No further comments

Response ID	Respondee	Summary
412	Burnside	Development on the Green Belt must not be permitted and housing must be met where the need is. The type of housing required must be built, including affordable housing, not just the type of housing which will give maximum profit for the developer, it must be needs led and not developer led. Development must be supported by infrastructure.
419	Juniper Green Community Council	The policy SESplan are now required to implement will lead to unwelcome, unsustainable change. Measures need to be put in place to ensure developers use all brownfield sites to minimise the need for green field development. There is a complete lack of transparency in the current system for determining effective land supply, which means that developers seem to have a veto in being able to declare some brownfield sites as ineffective. Need a clearer statement from the Scottish Government that it remains committed to a policy of <u>protecting the long established green belts around Edinburgh and other settlements.</u>
436	Mr James Poseley	More opportunities should be given for communities to influence plan making.
437	Mrs Susan Warwick	Land at Cammo should not be developed because of 1. impact on congested transport network, 2. impact of ecology and animal species and 3 loss of arable land when promoting sustainability.
441	Mr Blair Melville	SESplan is a strategic plan characterised by a lack of strategic vision. It is a Plan wedded to outdated ideas about: 1 "constraints" as the driver of locations for development, not potential; 2 sacrosanct Green Belt with no thinking about form, purpose or competing planning objectives; 3 Seeking to force the market to operate in ways which it cannot achieve; 4 Brownfield being inherently better/more sustainable than green field/edge of settlement; and 5 Dispersing housing demand in ways which worsen sustainability especially around travel patterns. It has no sense of seeking to achieve outcomes which are in the national interest, despite it being one of a suite of strategies the remainder of which clearly seek economic growth, prosperity, equality of opportunity, higher standards and so on.
446	Cramond & Barnton Community Council	The Murray Estate's Edinburgh Garden District proposal could offer the critical mass sufficient to provide the major infrastructure improvements which would be required. This would reduce the impact on West Edinburgh and its infrastructure.
447	HPG Dalkeith	South East Edinburgh is being artificially restrained. It is not clear from spatial strategy refresh how the allowances for SE Edinburgh were derived. There is an ongoing reliance on non delivering existing commitments. More housing land is required to support Shawfair, which Cauldcoats Farm can provide. Midlothian's Housing Land Audit 2012 does not demonstrate a 5 year effective land supply. Green Belt and landscape arguments are outweighed by the strategic nature if the site and the need to meet housing needs at source. Coalescence has been mentioned without any references to place making. Prior to finalising the SG there is a need to: 1 properly allocate additional housing requirements across SDAs with a weighting in favour of distributing sites in accordance with demand and need; 2 Fully test effectiveness and programming against the overall strategy and housing targets (including affordable housing); 3 Cost and phase the requirements for education and transportation provision as part of a realistic Action Plan; 4 Ensure that planning obligations are realistic and viable using triggers, interim payments and phasing; and 5 Properly balance the economic benefits and environmental impact of proposed allocations within the SDA

Response ID	Respondee	Summary
448	HPG Dalkeith	It is the intention of HPG Dalkeith to pursue the plan led approach and potentially press forward with a planning application in due course. In the interim we would urge SESplan and Scottish ministers to review the SPG recommendation for South East Edinburgh in the light of overall SDP targets and the proposed allocations elsewhere which are far less sustainable. provision is required for the 'full range of stakeholders' to be involved in the preparation of the guidance including the development industry and the public. It is not clear how this has been implemented within the Midlothian area given the procedural relationship that currently exists between the respective SDP and LDP processes. In reality a new call for sites and detailed SEA should have been part of the SPG review. Conclusion demonstrates that Cauldcoats meets the planning objectives for sustainable development, as well as seamlessly integrating with the spatial strategy and settlement pattern being pursued by the Strategic Development Plan (SDP). Cauldcoats clearly has the potential capacity to accommodate development and a strong case is made to propose an amendment to the preferred strategy to fully take key policy and material factors into consideration.
453	Mr Philip Leng	The reasons for green belt policy have not changed and are now more relevant than ever. Housing development should be focussed in sustainable areas as has been suggested by the governments green policies and not dictated to by housing developers pressure to develop cheaper, easier green belt land. Transport infrastructure in Balerno is congested and cannot accommodate further development.
462	Firrhill Community Council	Understand the need for affordable housing but not convinced that greenfield development on the edge of the City will deliver this. It is time local authorities took control of the housing needs in their area and invested in new developments to meet those needs and where necessary through the compulsory purchase of land for such developments
476	Miller Homes East Scotland	Fife Council should adopt the East Lothian Council approach to 5 year land supply given the time taken to adopt plans.
478	Mrs Blyth Peart	Important to recognise the loss of agricultural land.
480	Dr Simon Nicholson	Green Belt round Balerno should be protected for the benefits it brings. Transport infrastructure in Balerno is congested and cannot accommodate further development.
487	Mr Lauchie Scougall	Green Belt should be protected for the benefits it provides. Transport infrastructure in Balerno is congested and cannot accommodate further development. Balerno has poor access to employment which will lead to out commuting and an increase in vehicle emissions. Developing in Balerno would be contrary to the aims of SESplan of locating development in accessible locations that can be sustainable developed.
493	Dr Caroline Ritchie	Concerned that housebuilding requirement will compromise sustainability and other Scottish Government objectives. Too many short term decisions are being made against long term objectives.
501	Persimmon Homes East Scotland	As 441. More information justifying the strategy in the technical note should be brought into the SG itself.
505	Aberdour Community Council	Housing requirements should not be dictated. Further consultation required.
512	Stewart Milne Homes	AS 441. SESplan is a strategic plan characterised by a lack of strategic vision. It is a Plan wedded to outdated ideas about: 1 "constraints" as the driver of locations for development, not potential; 2 sacrosanct Green Belt with no thinking about form, purpose or competing planning objectives; 3 Seeking to force the market to operate in ways which it cannot achieve; 4 Brownfield being inherently better/more sustainable than green field/edge of settlement; and 5 Dispersing housing demand in ways which worsen sustainability especially around travel patterns. It has no sense of seeking to achieve outcomes which are in the national interest, despite it being one of a suite of strategies the remainder of which clearly seek economic growth, prosperity, equality of opportunity, higher standards and so on. SESplan 2 should set out a 30-50 year vision.
522	Aberdour Community Council	Duplicate of 505. Housing requirements should not be dictated. Further consultation required.

Response ID	Respondee	Summary
526	Wallace Land Investment & Management	This Supplementary Guidance continues to be non-compliant with SPP but with no benefits to delivering sustainable economic growth. If this Supplementary Guidance is approved unchanged, then it will only lead to further delays, creating even more problems for the delivery of much needed housing land in the subsequent LDP process. It has the potential to stifle much needed investment and growth in a region that is the economic driver for Scotland. This is contrary to NPF and SPP.
539	Hallam Land Management	This Supplementary Guidance continues to be non-compliant with SPP but with no benefits to delivering sustainable economic growth. If this Supplementary Guidance is approved unchanged, then it will only lead to further delays, creating even more problems for the delivery of much needed housing land in the subsequent LDP process. It has the potential to stifle much needed investment and growth in a region that is the economic driver for Scotland. This is contrary to NPF and SPP.
546	Farningham Planning Ltd	There is an error in tables 8.17 and 8.19. Given the text in the document South West and North West Edinburgh should be identified as capable of accepting strategic development.
563	Mr Nick Lansdell	Focus on developing existing sites, rather than spreading effort and investment across new sites and lessening likelihood of plan success. Delivery of existing sites in West Lothian within the plan period is unlikely
564	Scottish Property Federation	There is little analysis of 'non-traditional' housing tenure within the Supplementary Guidance and yet Edinburgh is arguably one of the most attractive locations for build to rent activity in the UK. CEC should be encouraged to act upon this positive attraction. Building for market rental properties may actually deliver quicker returns in terms of housing supply than the traditional home buying sector. If a major increase in supply of this tenure can be achieved then this may act to relieve pressure upon other parts of the region to deliver more traditional forms of housing quickly. That there is a potential clash between where the Supplementary Guidance and planning authorities are seeking investment and where the private sector believes housing investment can be delivered. This could lead to inertia which will benefit neither the development industry nor the delivery of local and central government policy. We believe there must be some scope for controlled development of urban centres, in particular where they coincide with appropriate infrastructure developments. This could be done with a view to reinvesting appropriately defined revenues to the support of brownfield sites retained within the existing development plan.
571	Mr Morrison	A through analysis of the ecological and traffic situation at Cammo is required.
582	Anonymous	Duplicate of 584. It is disturbing to note that Reporters appear to be more concerned about local authorities meeting their housing needs by reference to SESplan than ensuring that the democratically approved Local Plan is applied. Planning approval by Appeal is not a suitable process and will lead to unsustainable development and landbanking.
584	Mr Archibald Clark	It is disturbing to note that Reporters appear to be more concerned about local authorities meeting their housing needs by reference to SESplan than ensuring that the democratically approved Local Plan is applied. Planning approval by Appeal is not a suitable process and will lead to unsustainable development and land banking.
585	Susan Kirby	Green Belt around Balerno should not be developed because: it is not accessible to employment and has limited public transport access; would lead to a loss of productive farmland; and the Green Belt is to stop urban sprawl.
586	Cadzow Estate	concerned that the Supplementary Guidance has failed to make adequate provision for housing land in the SESplan. Concerned that it has not sufficiently considered housing in the West Edinburgh/East West Lothian interface. Land at Kilpunt Farm is flexible, unconstrained, available immediately and capable of delivering large supply of housing.
594	I&H Brown Limited	Support for Fife Council's continued position on Dunfermline's expansion to the West, North and North West.
596	North Berwick Community Council	North Berwick is already accommodating an amount of new development. The existing infrastructure cannot cope with a huge influx of new houses and that the life style currently enjoyed by residents will be ruined. If new development is to occur it should be for smaller, affordable homes for local people. We would urge that new homes should be built as closely as possible to employment opportunities and transport links.

Response ID	Respondee	Summary
597	Helen McCallum	If development is permitted in Aberdour it will destroy the seaside character of the village and the attractiveness of the beach. Development should be located towards Kinross instead.
598	Barratt and David Wilson Homes	Over reliance on distributing Edinburgh's need to Midlothian and Scottish Borders. Reconsideration is required to accommodate a higher proportion of Edinburgh's demand within the north-west, south-west, south-east and west of the city. Additional allowances in Fife appear over-optimistic and should be re-directed toward Edinburgh. Interim guidance on land supply, like East Lothian is required to be adopted by other authorities.
599	Jenny Parsons	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
600	Jimmy Anderson	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.

Response ID	Respondee	Summary
601	Mr Jonathan Gillies	We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss or use of a significant area of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie, recently designated; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.
602	Jan Samuel	As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss or use of a significant area of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie, recently designated; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.
603	Mr Alan Watson	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.

Response ID	Respondee	Summary
604	Mr Keith Forrest	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
605	Mr Malcolm Durney	As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.
606	Mrs Arlene Reid	As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.

Response ID	Respondee	Summary
607	The Community Council of the Royal Burgh of Peebles and	The increased housing requirements affecting Peebles are excessive.

APPENDIX B Summary of the main issues raised by the Consultation Responses
Received and SESplan Responses to the Consultation Responses
Received on the draft Supplementary Guidance on Housing Land

Summary of Main Issues (By Alphabetical Order)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sq/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
A - Brownfield				
A1	113, 234, 295, 342, 233, 144, 149, 419, 331, 504, 143, 169, 322, 110, 96, 570, 222, 349, 380, 390, 251, 325., 459, 579, 348, 137, 402, 332, 91, 376, 350, 416	Brownfield sites should be maximised first. Priority should be given to brownfield opportunities. There is sufficient brownfield land within Edinburgh to meet the required need and demand.	The approved Strategic Development Plan (SDP) gives priority to brownfield sites. When preparing Local Development Plan (LDPs) Member Authorities should give priorities to brownfield sites if it is shown that can be delivered over the plan period.	Not required in this instance
A2	445, 492, 461, 142, 402, 570, 222, 387, 380, 390, 564	Brownfield sites should be incentivised.	SESplan will raise the issue of incentives with Member Authorities and the Scottish Government.	Not required in this instance
A3	466, 504, 137, 380, 53	Research suggests there are 10,000 empty homes in Edinburgh. These should be brought back into use before releasing greenfield land. Empty homes should be used to meet need.	The level and type of empty homes that can be brought back into use could be considered in meeting the housing requirement in LDP preparation.	Not required in this instance
A4	457, 323	The numbers will undermine the delivery of housing on existing brownfield sites.	The approved SDP indicates that brownfield sites should be prioritised and that new development proposals will complement not undermine the delivery of existing committed development.	Not required in this instance
B - Completions				
B1	13, 19, 14, 20	Table 3.2 of the Technical Note shows completions incorrectly as 4,451, this figure should be 4,437.	The latest information for completions is 4,451. The figure of 4,437 comes from totalling the number of completions as reported and published in the annual Housing Land Audits (2010, 2011 and 2012). However, when discussing Audits with the development industry, errors / omissions from previous Audits are advised. The figures cannot be updated in published documents but are recorded on the Housing Land Audit database.	Not required in this instance
B2	308, 393	The Guidance has been drafted on the basis that a very significant increase in completions will occur. This is questioned.	Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
C - Constrained				
C1	13,14, 19, 20, 162, 168, 308, 519, 528, 163, 365, 371, 11, 485, 544, 497, 509, 531, 542, 167, 498, 508, 533	The figures are based on unsubstantiated assertions and overstated.	The figures were drawn from the agreed Housing Land Audit (HLA) 2012. The purpose of the Supplementary Guidance is not to demonstrate a 5 year land supply or to allocate individual development sites but to identify a housing land requirement that will enable the delivery of the vision, aims and spatial strategy of the approved SDP.	Not required in this instance
C2	16, 427, 449, 164, 529, 533, 22, 547, 314, 219, 485, 540, 301	Constrained land will not fully deliver over period	Effective supply is to be reviewed during LDP preparation to meet the requirements set out in table 3.1. This is set out in the Approved SDP and paragraph 3.8 of the Supplementary Guidance. All constrained development is not anticipated to be delivered within the plan period.	Not required in this instance
D - Delivery				
D1	212, 69, 499	Planning making delays will prevent delivery	LDPs are progressing following the adoption of the SDP and the forthcoming approval of the Supplementary Guidance.	Not required in this instance
D2	409, 54, 56, 455, 427, 417, 580, 106, 292, 294, 33, 411, 237, 385, 398, 380, 264, 311, 460, 428, 120, 298	Lack of finance/state of economy preventing delivery. The required rates are not realistic prevent short term delivery.	The SDP and LDPs can promote sustainable economic growth which will support delivery of the ambitious plan. Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance
D3	593, 595, 563, 380	Further allocation of sites could undermine delivery of existing sites	The SDP sets out that "New development proposals will complement and not undermine the delivery of existing committed development".	Not required in this instance
D4	71	Under delivery to be factored later into plan period	Member authorities will base their 5 year land supply calculations on the period 2009-2024.	Not required in this instance
D5	68, 537, 418, 524	LDPs to re-assess land supply in LDP preparation	Paragraph 23 of the approved SDP sets out that the LDPs will re-assess the ability of sites to deliver completions by 2024. Paragraph 3.13 of the Supplementary Guidance required 5 year land supply calculations to be factored into LDP preparation.	Not required in this instance
D6	71, 472	Sites need to be permitted before LDPs prepared	Where they accord with policy, the SDP does not prevent this.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
D7	265, 587, 189, 177, 182, 428, 195, 200, 87, 270, 552, 183, 188, 194	Existing strategic sites are not delivering	The SDP sets out to deliver a long term vision which should not be discarded for unsustainable short term gains. The approved SDP states that the spatial strategy builds on existing committed development. New development proposals will complement and not undermine the delivery of existing committed development.	Not required in this instance
D8	434, 181, 182, 469, 199, 200, 535, 495, 500, 486, 545, 187, 188, 301, 194, 303	Need generous supply of effective sites in marketable areas	The strategy set out in the SDP of focussing new development in the identified SDAs, was approved by Scottish Ministers. These areas are considered marketable and align with areas of housing need and build on future opportunities.	Not required in this instance
D9	385	Sufficient existing sites.	Constraints on some of these sites will prevent delivery within the plan period. This issue is assessed annually by member authorities.	Not required in this instance
D10	598, 265, 476	Need for East Lothian Five Year Land Supply approach.	This is an LDP matter. Approved SDP policy 7 sets out the position on 5 Year Land Supply.	Not required in this instance
D11	474	Identify smaller sites without infrastructure requirements.	This is an LDP matter.	Not required in this instance
D12	107, 121	Existing sites should be incentivised.	The SDP sets out that "New development proposals will complement and not undermine the delivery of existing committed development".	Raise the issue of incentives with the appropriate bodies.
D13	492, 88	Increasing funding for social housing.	This is not a matter that the Supplementary Guidance can address. The comments will be forwarded to the Scottish Government and the Member Authorities.	Not required in this instance
D14	557	Push public transport initiatives to support development.	The SESplan Action Programme seeks to deliver strategic transport interventions to support development. More local initiatives will be set out in LDPs and Local Transport Plans.	Not required in this instance
D15	312, 520	Need for discussion between developers/land owners and LPAs and SDPA on delivery issues. Need to work together.	There is a proposed workshop between Homes for Scotland and SESplan members on delivery issues.	Not required in this instance
D16	434	Need to prioritise action programme.	The next Action Programme will contain details on priorities. This will build on work that is already underway.	Not required in this instance
D17	88	Use compulsory purchase where allocated land is not being developed.	SESplan does not have these powers. These comments will be passed onto Member Authorities and the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
D18	109	Lower affordable housing requirements to enable delivery.	This would conflict with achieving other strategic goals. Affordable housing requirements are set by LDPs. This comment will be forwarded to Member Authorities.	Not required in this instance
D19	433	Greater critical mass of SDAs required to allow delivery.	The scale of the SDAs has been assessed through a robust site assessment exercise. LDPs will allocate specific sites within SDAs.	Not required in this instance
D20	556	Low cost and low infrastructure sites required.	All sites have a cumulative impact on infrastructure.	Not required in this instance
D21	550	Do not maintain the status quo of simply relying on allocated sites/ commitments which are undeliverable in their current form.	LDPs will review the level of allocations required to deliver the housing requirement.	Not required in this instance
D22	34, 46, 60, 246, 475	The distribution of the SESplan housing requirement is deliverable.	Noted.	Not required in this instance
D23	99	Housing will only be delivered if it is in housebuilders interests.	Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance
D24	275	Land delivery is only the start of the building process.	This is acknowledged.	Not required in this instance
D25	518, 477	No comment on delivery.	Noted.	Not required in this instance
D26	247	Build houses where there is a local need and not for the convenience of developers.	It is an aim of the Supplementary Guidance to meet housing need where it arises.	Not required in this instance
D27	277	Landowners to be offered incentives/generous terms to enable delivery.	This is not within the remit of SESplan. The comments will be forwarded to the Scottish Government.	Not required in this instance
E - Density				
E1	162, 168, 163, 167, 164, 431	Increasing densities as a mathematical exercise is simplistic and does not deliver sustainable development.	Densities of specific developments is an LDP matter. However, higher density developments are more sustainable as they support sustainable transport more easily than low density development and are a more efficient use of land. Densities will be set appropriate to their context. NPF3 paragraph 2.19 refers to increasing density in cities to accommodate growth.	No change on density
E2	577, 237, 291	Densities should be increased and minimum requirements set.	Densities will be set appropriate to their context.	No change on density

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
F - Effective Supply				
F1	13, 19, 14, 20, 16, 430, 451, 456, 313, 449	If the process was undertaken in a robust manner the effective supply would be smaller and the additional housing land requirement larger as a result. It is questioned.	The process was undertaken using HLA 2012, which was the most recent information available during preparation. Effective supply is to be reviewed during LDP preparation to meet the requirements set out in table 3.1. This is set out in the Approved SDP and the Supplementary Guidance.	Not required in this instance
F2	455, 419, 290, 387	Question developers role in effective land process	SESplan made representations to the Scottish Government on the operation of the 5 Year Land Supply process and effective land for the review of SPP. The issue is being considered by the Scottish Government.	Not required in this instance
F3	308, 430, 497	Insufficient explanation as to the how the housing land supply has been calculated and how this is based on Housing Land Audit 2012.	The figures are based on HLA 2012 which are available from each member authority.	Not required in this instance
F4	16, 22	Housing Land Audit 2012 is flawed.	Housing Land Audits are agreed by each member authority.	Not required in this instance
F5	447	Need to fully test effectiveness	It is not the role of a Strategic Development Planning Authority to test the delivery and effectiveness of each housing site across the region.	Not required in this instance
F6	136	Need for SG to require LDPs to be informed by an update to date 'call for sites' process.	This is a matter for individual member authorities in preparing their LDPs.	Not required in this instance
G - Further Actions				
G1	213	Quicker review of SESplan	The SESplan SDP2 Main Issues Report will be produced and consulted upon late in 2014.	Not required in this instance
G2	213	Create Edinburgh City Region Masterplan	The SESplan SDP2 Main Issues Report will be produced and consulted upon late in 2014.	Not required in this instance
H - General				
H1	383, 377, 326, 400	Pressure on Councils to permit large, unsustainable, peripheral greenfield development	New development proposals will complement and not undermine the delivery of existing committed development. Whilst brownfield sites will be prioritised, delivery of the housing requirements will required development on greenfield sites.	Not required in this instance
H2	582, 256, 584, 88	Planning by appeal is unsustainable. It leads to landbanking, which should be penalised.	This is not a matter for SESplan but the comments will be forwarded to the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
H3	257	Outlaw non-determination appeals	This is not a matter for SESplan but the comments will be forwarded to the Scottish Government.	Not required in this instance
H4	488, 54, 137, 436, 561, 355, 50, 95, 100, 562	Financial and developer interests are being promoted over community interests. Communities and the public have not been considered and should be given a say.	Planning is about achieving a sustainable development which often involves a balance between competing interests. There have been opportunities for public and community involvement in the preparation of the SDP. There will be further opportunities during LDP preparation.	Not required in this instance
H5	361	Democratic opinion should be respected	Planning is about achieving a sustainable development which often involves a balance between competing interests. There have been opportunities for public and community involvement in the preparation of the SDP. There will be further opportunities during LDP preparation. Decisions on the Supplementary Guidance will be made by elected representatives.	Not required in this instance
H6	527, 474, 517	Has not worked with house building sector	This is incorrect. The SDPA meet with Homes for Scotland multiple times during the Supplementary Guidance preparation process. The SDPA were all also fully aware of the house building sector's views through the SDP examination process.	Not required in this instance
H7	223, 448, 584, 462	Development should be plan lead not appeal lead	The SDPA supports this.	Not required in this instance
H8	448	Should have undertaken a call for sites	The Supplementary Guidance is informed by site availability information provided by member authorities.	Not required in this instance
H9	282	Language of documents is impenetrable	This will be taken into account when creating future planning documents.	Not required in this instance
H10	505, 25, 282	Further consultation required/consultation inadequate.	Consultation procedures will be considered before future consultations. LDPs will have consultation stages in as part of their preparation.	Not required in this instance
H11	354, 347	Website is difficult to use.	We will raise this with the organisation that operate the Consultation Portal	Not required in this instance
H12	109	Rural development requires to be support by public transport and broadband access	Initiatives are underway to increase broadband access and public transport accessibility in rural area. The Borders Railway is one such project seeking to improve public transport accessibility in rural areas. These comments will be passed onto the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
H13	248	Matching new housing with jobs in rural areas	The SDP seeks to grow the rural economy.	Not required in this instance
H14	118	Guidance should show the split between existing LDPs and new demand	The Supplementary Guidance shows the current existing land supply.	Not required in this instance
H15	282	No attention to environmental impacts of proposals	Environmental designations were considered as part of the spatial strategy process. The specific impacts of development will be considered as part of the site masterplanning, design and development management processes. An Strategic Environmental Assessment accompanied the draft Supplementary Guidance which examined its potential environmental impacts and mitigations.	Not required in this instance
H16	238	Build smaller house-types to meet need	This comments will be forwarded for LDPs to consider.	Not required in this instance
H17	546	Errors in tables 8.17 and 8.19	This is acknowledged and will be rectified.	Correct error.
H18	73, 77	Flood risk should be assessed/given more consideration	Flood risk is assessed as part of the updated Spatial Strategy Assessment. Flood risk is addressed in approved SDP policy 15.	Not required in this instance
H19	511, 319	Development plans should operate as business plans for investment	A key focus of the SDP is promoting investment and economic growth.	Not required in this instance
H20	407	Where are the jobs to match the additional houses.	A key focus of the SDP is promoting investment and economic growth.	Not required in this instance
H21	559	Economic sites should be protected.	It is not proposed to develop housing on quality economic development sites.	Not required in this instance
H22	55	The process should begin again free of vested interests.	The SDP was approved by Scottish Ministers. Involvement is sought from all interested parties.	Not required in this instance
H23	61	Housing should be built to the highest efficiency and design standards.	This is supported and will be addressed in LDPs.	Not required in this instance
H24	88	Development should create pleasant environments	SESplan and our Member Authorities wish to help deliver quality development. Place making is recognised in the SDP. Detailed design policies will be set out in LDPs.	Not required in this instance
H25	8	Promoting the Sports Scotland plan making toolkit.	The toolkit is welcomed and our member authorities will utilise it in LDP preparation.	Not required in this instance
H26	62, 81, 89, 101, 111, 176, 221, 239, 258, 401	No further comment.	Noted.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
I - Generosity				
I1	178, 184, 190, 196, 315, 555, 592, 497, 498	The land requirement should be a factor of 20% or more higher than the number of house units/need for flexibility allowance.	Approved SDP policy 6 sets out the position on housing land flexibility. Percentage requirements are not set out in the current SPP.	Not required in this instance
I2	413	SPP is not clear on the definition of a generous supply.	This is being looked at in the review of SPP.	Not required in this instance
I3	271	The guidance should allow for housing developments in sustainable locations to be permitted to allow for sites to come forward.	Approved SDP policy 6 sets out the position on housing land flexibility.	Not required in this instance
J - Green Belt				
J1	119, 234, 294, 327, 378, 414, 426, 488, 412, 333, 480, 336, 331, 90, 142, 137, 169, 394, 110, 321, 320, 343, 334, 391, 107, 249, 96, 402, 487, 49, 565, 222, 425, 453, 332, 349, 91, 390, 376, 241, 328, 33, 337, 357, 400, 355, 585, 578, 567, 285	The Green Belt should be protected for the benefits it provides.	The Green Belt was examined in the Spatial Strategy Assessment for both the SDP and the update in the Supplementary Guidance. The importance of the Green Belt and its purposes are acknowledged in SDP Policy 12. SDP Policy 7 requires development not to undermine Green Belt objectives. SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land may be needed to meet housing requirements.	Not required in this instance
J2	313, 538, 525, 458	SESplan should establish the need for the Green Belt and whether it should be retained or released and undertake a broad review of its area. Continued erosion will lose all control.	The approved SDP sets out Green Belt policies. A study of the Green Belt was undertaken in 2008 to inform the SDP. SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land may be needed to meet housing requirements.	Not required in this instance
J3	324, 357, 585	The Green Belt prevents urban sprawl.	This is acknowledged but not stated in Scottish Planning Policy. They maintain the landscape setting of settlements and help direct planned growth to the most appropriate locations.	Not required in this instance
J4	235, 293, 488, 691, 96	The figures would lead to unacceptable pressures on the Green Belt and impact on biodiversity.	SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J5	447, 529, 441	Green Belt and landscape concerns are outweighed by the need to meet housing need where it arises.	This statement is not consistent with SPP and the approved SESplan SDP. SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J6	299, 419	The Scottish Government should be clearer about protecting or developing Green Belt.	This comments will be forwarded to the Scottish Government	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
J7	84, 85	Suitable Green Belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability.	The development of the SDAs will involve long planned green belt releases to support development in accessible locations.	Not required in this instance
J8	438	Contradiction between prioritising brownfield and level of Green Belt development.	LDPs are required to prioritise deliverable brownfield sites before requiring greenfield allocations.	Not required in this instance
J9	489	Acknowledge there may be a need to build upon Green Belt land but concerned at the extent to which this is taking place.	The development of the SDAs will involve long planned green belt releases to support development in accessible locations.	Not required in this instance
J10	566	Further justification for Green Belt release must be provided.	SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J11	309	It is entirely appropriate at the point in the Development Plan cycle where strategic and local policy is under review to undertake a more radical review of Green Belt boundaries.	The approved SDP sets out Green Belt policies. A study of the Green Belt was undertaken in 2008 to inform the SDP. Both the SDP and the Supplementary Guidance do not support continued erosion of the Green Belt.	Not required in this instance
K - Housing Needs and Demand Assessment / Housing Market Area Assessment				
K1	232, 237, 10, 418, 128, 407, 384, 249, 573, 350	Question the projections and the need and demand figures.	The Housing Need and Demand Assessment (HNDA) was approved as robust and credible by the Centre for Housing Market Research (CHMA). The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
K2	519, 528, 530, 541, 517	The strategy should follow the Housing Market Area Assessment evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife.	The setting of a housing requirement meeting housing need is more complex than an analysis of past private housing sales. For the SDP the whole of SESplan was regarded as a single housing market area. The suggested approach also do not take account of opportunities and constraints and capacities relating to the environment and infrastructure. The supplementary guidance balances the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis and market and deliverability considerations whilst, aiming to achieve wider policy and strategy goals. It should be noted that 4,000 of Midlothian's housing requirement will be delivered in the South East Edinburgh SDA.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
K3	507, 224	The strategy should start from a point of asking whether the pattern of demand in the Housing Need and Demand Assessment can be met.	For the SDP the whole of SESplan was regarded as a single housing market area. The supplementary guidance balances the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis and market and deliverability considerations whilst, aiming to achieve wider policy and strategy goals. As set out in approved SDP, Edinburgh cannot fully meet all the housing need and demand that arises there within its LDP boundaries. It should be noted that 4,000 of Midlothian's housing requirement will be delivered in the South East Edinburgh SDA.	Not required in this instance
K4	104, 329	Question whether there is a market for the level of housing. There is no evidence to suggest that 29,500 houses are needed in Edinburgh.	The HNDA was approved as robust and credible by the CHMA. The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
K5	577	The figures are based on GRO estimates which are themselves based on estimates and trends and take no account of the economic situation.	The HNDA was approved as robust and credible by the CHMA. The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
L - Infrastructure				
L1	134, 135, 445, 311, 312, 165, 474, 117, 368, 500, 557, 511, 319	Need for greater infrastructure investment from public sector and Scottish Government and involving the use innovative funding solutions.	Investigations into infrastructure delivery and funding are underway with public and private sector involvement. The comments will be passed onto the Scottish Government.	Not required in this instance
L2	374, 445, 311, 447, 283, 88, 368, 511	Plans must be realistic regarding developer funded infrastructure	This is acknowledged.	Not required in this instance
L3	411, 116, 88	Infrastructure before development	Infrastructure will be phased appropriately to be delivered when required.	Not required in this instance
L4	264, 557	Infrastructure requirements to be phased for when required.	Infrastructure will be phased appropriately to be delivered when required.	Not required in this instance
L5	84, 85	There must be grade separation at Sheriffhall junction and improvements at Old Craighall junction.	Studies are being undertaken to identify interventions and costs for these junctions.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
L6	557	Education and transport are the key constraints	This is acknowledged in the infrastructure assessment in the Technical Note.	Not required in this instance
L7	69	Infrastructure providers to be proactive	There is ongoing liaison with infrastructure providers, particularly focussing on funding the required infrastructure.	Not required in this instance
L8	257	Need for co-ordinated infrastructure review	Strategic infrastructure requirements for the SESplan area are set out in the Action Programme and will be reviewed as part of the process for preparing the next SDP. They will also be reviewed as part of LDP preparation. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L9	69	Education capacity should not prevent development	Development cannot be accommodated if the essential infrastructure requirements are not met.	Not required in this instance
L10	209	Paragraph 5.37 of the Technical Note and the reference to Transport Scotland is not understood. It is for the agency to carry out the necessary improvements.	Further investigations are underway into the funding of trunk road improves related to development.	Not required in this instance
L11	308	The Guidance needs to responsibly address the provision of strategic infrastructure.	Strategic infrastructure requirements for the SESplan area are set out in the Action Programme and will be reviewed as part of the process for preparing the next SDP. They will also be reviewed as part of LDP preparation. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L12	386	The Edinburgh LDP does not fully consider existing capacity issues at key junctions leading into Edinburgh.	The Edinburgh LDP is accompanied by a transport appraisal with mitigation measures identified through the LDP Action Programme.	Not required in this instance
L13	482	As the Capital City of Scotland, steps should be taken to remove barriers to development to prevent stagnation.	SESplan and partners wish to see the infrastructure barriers to economic growth and development removed. The SESplan response to NPF3 focussed on the issue of infrastructure provision to promote growth. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L14	434	Infrastructure constraints without support will lead to non-effective sites	Investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
L15	139	Combining the West Edinburgh and Fife totals, the Forth Bridge and roads into the City cannot take the extra vehicles. It may be necessary to introduce tolls.	Whilst this is not a consideration for the Supplementary Guidance, the comments will be forwarded to Transport Scotland.	Not required in this instance
M - Key Agency				
M1	40, 44, 45	SNH cannot comment on need and demand.		Not required in this instance
M2	74, 75, 80	SEPA cannot comment until a Strategic Flood Risk Assessment has been undertaken. The re-assessment only considers Scottish Water infrastructure and not other issues related to water management. The impacts on ground and surface water within the South East Edinburgh SDA are of considerable concern.	Comments noted. However, the issues raised by SNH and SEPA are outside the remit of the Supplementary Guidance which focuses on setting a housing land requirement. The spatial strategy, design and flooding issues are addressed in the approved SDP. Work is underway on a Strategic Flood Risk Assessment for the SESplan area.	Not required in this instance
M3	266	Historic Scotland has no specific comments in relation to the actual breakdown and distribution of the additional allowances within or outwith SDAs. Would note the allocation of additional housing land increases the potential for impacts on the historic environment.	The SEA Environmental Report sets out an strategic assessment of the potential for impacts on the historic environment.	Not required in this instance
M4	171, 172, 173	Scottish Government are content with Table 3.1 subject to the responses to Questions 5 and 6 (Delivery) (Responses 174 and 175).	Noted.	Not required in this instance
M5	174, 175	Need to understand impacts on infrastructure, including cross boundary and cumulative.	Following the transport appraisal work on the SDP and Supplementary Guidance, further work is underway with Transport Scotland, SEStran and Member Authorities to further understand these impacts.	Not required in this instance
M6	174, 175	Spatial strategy is questionable without a clear mechanism for delivering and funding infrastructure	The Spatial Strategy is set out in the SDP which was approved by Scottish Ministers. Work is underway with Transport Scotland, SEStran and Member Authorities to further understand these impacts. All key parties, including the Scottish Government, will have a role in funding infrastructure in the SESplan region.	Not required in this instance
M7	47, 76, 79	SNH and SEPA wish to work with SESplan and member authorities to assist in the delivery of development.	Assistance from SNH and SEPA is acknowledged and welcomed.	Not required in this instance
M8	48	SNH support the design led approach.	This is welcomed as SESplan also support the design led approach. However, the Supplementary Guidance has a specific housing requirement remit.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
N - Landscape Designations				
N1	234, 294, 378, 348	Important landscapes should be protected.	Landscape designations were considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
O - Paragraph 3.8				
O1	13, 14, 20, 210	It is inappropriate of the Strategic Development Planning Authority to abdicate responsibility to LDPs.	The strategy is set out in the approved SDP. The Supplementary Guidance does not abdicate responsibility as development is directed towards the SDAs. Development outwith SDAs will be required to be in compliance with policy 7. The Supplementary Guidance meets the requirements of approved SDP Policy 5.	Not required in this instance
P - Paragraph 3.9				
P1	509, 366, 372, 508	Does not accord with SDP Policy 7 as amended by Ministers.	This is incorrect. Policy 7 relates to LDP and 5 Year Land Supply issues at LDP level.	Not required in this instance
Q - Policy				
Q1	300, 237, 488, 492, 493, 333, 324, 225, 419, 90, 137, 394, 321, 320, 343, 249, 487, 49, 425, 453, 349, 383, 398, 399, 573, 377, 380, 381, 382, 344, 241, 330, 50, 298	Delivery of the housing requirement on greenfield land / unsustainable locations will lead to outcomes opposite of the Government's and SESplan's sustainable goals and aims.	The Supplementary Guidance and the approved SDP have taken a balanced and considered approach. It acknowledges that housing need has to be met but this has to be informed by both the SDP and Scottish Government aims as well as infrastructure and environmental opportunities and constraints. The delivery of housing will contribute towards economic growth.	Not required in this instance
Q2	208, 369, 189, 193, 539, 433, 161, 164, 440, 529, 363, 495, 481, 540, 544, 288, 526	Non compliance with SPP - supply not directed to demand / delivery areas.	This is incorrect. The Supplementary Guidance has to achieve a careful balance of directing housing requirements to areas of deliverable housing demand as well as achieving wider policy goals and factoring in other consideration including housing need and infrastructure and environmental constraints, capacities and opportunities. No one consideration is given crowning importance over another.	Not required in this instance
Q3	519, 528, 523, 532, 536, 543	The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement. This is contrary to SDP Policy 5 and SPP.	The methodology analyses the capacity of each area to accommodate further development. This is considered alongside the principle of meeting housing demand at origin and the environmental and infrastructure capacities and constraints assessments.	Clarify wording in section 5 and 6 of the technical note. This to clarify the methodology undertaken.

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Q4	236, 310, 366, 372	Allocating Additional Allowances is a departure from the approved SDP which sets the 13 SDAs as the primary locations for development. This strategy is not properly justified.	The Supplementary Guidance does not allocate additional allowances. They are an indication of the level of additional supply required at present to meet requirements. Their scale is based upon capacity and suitability assessments undertaken by Member Authorities in conjunction with the SDPA.	Not required in this instance
Q5	260, 63, 469, 57, 112, 240, 242	Accords with Policy.	Noted.	Not required in this instance
Q6	67	Would wish to see the approach remain as in the draft document since currently the Outwith SDA requirements are referred to as suggestions and the levels described as indications. This approach is consistent with the flexibility requirements specifically SDP Policies 6 and 7, SPP and draft SPP.	Noted.	Not required in this instance
Q7	590	Table 3.2 is contrary to established planning policy in that it has allocated in excess of 20% of sites Outwith SDAs.	Identifying capacity outwith SDAs is in accords with the approved SDP. The Supplementary Guidance does not allocate sites for development.	Not required in this instance
Q8	229	SPP should allow for realistic plans.	Agree.	Not required in this instance
Q9	485	Use of windfall contrary to guidance.	This statement is incorrect. The use of a windfall allowance accords with approved SDP Policy 5.	Not required in this instance
Q10	517	Use of constrained land contrary to SDP and SPP.	It is a requirement of LDPs to re-assess land supply during LDP preparation. The land supply calculations were based on HLA 2012.	Not required in this instance
Q11	268	Requires presumption in favour of sustainable development.	This is not current policy.	Not required in this instance
Q12	307	Improve references to SPP on housing and Green Belt.	References to housing and green belt are set out the approved SDP.	Not required in this instance
Q13	517	Additional allowances 2019-2024 contrary to SPP.	The additional allowances set out in table 3.2 are an indication of the potential contribution that each SDA could make towards meeting the housing requirements. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 have been met.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Q14	208	Non compliance with SPP - requirement not linked to infrastructure delivery.	The requirement is linked to infrastructure delivery. Approved SDP Figure 2 and the Action Programme set out the strategic infrastructure required to support the strategy. Further detail will be contained in LDPs.	Not required in this instance
Q15	26	Role of SDPA to confirm compliance with SPP.	Noted.	Not required in this instance
Q16	43, 78, 82, 513, 576, 583	No comment on SPP compliance.	Noted.	Not required in this instance
Q17	103, 122, 339	Cannot confirm compliance until SPP review is complete	The Supplementary Guidance should comply with adopted Scottish Planning Policy not draft guidance. Due to required timescales, the timetable for the production of the Supplementary Guidance cannot be delayed to accommodate the review of SPP.	Not required in this instance
Q18	170	Accords with SPP subject to transport concerns being met.	Noted. Further work is underway to continue to address transport infrastructure delivery issues.	Not required in this instance
R - Prime Agricultural Land				
R1	32, 51, 234, 294, 327, 378, 489, 577, 33, 300, 488, 581, 322, 249, 96, 425, 479, 383, 377, 382, 330, 437, 585, 39, 272	Prime agricultural land should be protected / prevent loss.	Prime agricultural land was considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
R2	581	Need for the Scottish Government to set out how much Agricultural land to be retained.	This comment will be forwarded to the Scottish Government.	Not required in this instance
R3	478	Important to recognise the loss of agricultural land.	Prime agricultural land was considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
S - Strategy				
S1	463, 507, 519, 528, 429, 439, 179, 185, 191, 197, 369, 452, 527, 427, 282, 363, 495, 506, 215, 481, 517, 440	No justification to explain the distribution.	The reasoning for the distribution is set out in the accompanying Technical Note summarised in paragraphs 3.3 and 3.4 of the Supplementary Guidance. For clarity, this summary will be expanded in the Supplementary Guidance.	Expand the summary of justification of the distribution of the housing requirement in the Supplementary Guidance.
S2	373, 165, 166, 533, 535, 367, 506, 510, 511, 485, 545, 289, 440, 564, 303	Housing should be delivered to areas of demand and where housebuilders believe investment can be delivered.	The Supplementary Guidance and the approved SDP have taken a balanced and considered approach. It acknowledges that housing need has to be met but this has to be informed by both the SDP and Scottish Government aims as well as policy drivers and infrastructure and environmental opportunities and constraints.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
S3	430, 431, 548	The refresh of the assessment is selective, subjective, arbitrary and contradicts statements made in MIRs and Proposed LDPs.	This is incorrect. The refresh of the Spatial Strategy Assessment was agreed with Member Authorities. It is acknowledged that there is a typographical error in tables 8.17 and 8.19.	Not required in this instance
S4	431	It is not evident how the refresh has weighted economic and other benefits of delivery against environmental impact or how this is reflected in the distribution of the additional allocations.	Delivery of development and economic impact is not directly weighed against environmental impact. Setting a housing requirement requires more subtlety. Delivery considerations are required for all housing locations. The economic benefits of housing delivery is acknowledged.	Not required in this instance
S5	527, 164. 529, 510, 540, 517	Must be sustainable and not lead to commuting back to Edinburgh	The majority of the of the housing requirement identified will be located within Edinburgh or it's immediate hinterland. 4,000 dwellings of Midlothian's requirement will be developed in the South East Edinburgh SDA. Based on committed development a significant proportion of development will be located in accessible locations near Edinburgh in northern Midlothian, eastern West Lothian and western East Lothian. Sustainability is a balance of many, often competing considerations.	Not required in this instance
S6	507, 369, 506, 517, 440	The re-assessment of capacities and constraints is weak. The assessment of SAAs 9, 10, 11, 21, 22 and 23 is superficial.	The assessments are built on wider evidence set out in earlier tables in the appendices as well as LDP evidence base work.	Not required in this instance
S7	494, 223, 257	Will lead to piecemeal development not linked to infrastructure planning	A plan led system should prevent piecemeal development.	Not required in this instance
S8	84, 85, 444, 252	There must be recognition of capacity constraints relating to existing communities.	A capacities and constraints analysis was undertaken when preparing the Supplementary Guidance. LDPs will also undertake a similar local level analysis. It should be noted that new development can fund infrastructure and service improvement which increase capacities and remove constraints.	Not required in this instance
S9	441, 512	Plan is wedded to outdated ideas on brownfield, green belts, delivering housing and dispersal of housing.	Disagree. The approved SDP and Supplementary Guidance strikes an appropriate balance between the three elements of sustainable development to achieve SESplan and Scottish Government aims and objectives.	Not required in this instance
S10	501	Strategy justification should be brought into SG	The reasoning for the distribution is set out in the accompanying Technical Note summarised in paragraphs 3.3 and 3.4 of the Supplementary Guidance. For clarity, this summary will be expanded in the Supplementary Guidance.	Expand the summary of justification of the distribution of the housing requirement in the Supplementary Guidance.

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
S11	118	Moving housing need out of Edinburgh leads to large houses being built for commuting families which don't meet needs of communities.	Meeting strategic housing need acknowledges the movement of people away from their existing communities. The economic needs of Edinburgh are greater than it's capacity to house its requirements.	Not required in this instance
S12	527	Environmental constraints are exaggerated	Environmental considerations are given an appropriate weighting in line with SPP and the approved SDP. The SEA also informed the preparation of the Supplementary Guidance.	Not required in this instance
S13	512, 441	SDP lacks strategic vision	The Strategic Vision for the SDP was approved by Scottish Ministers.	Not required in this instance
S14	486	Resolve barriers and constraints rather than avoiding them	Where possible, measures are being explored and taken to overcome capacities and constraints. However, some environmental constraints cannot be overcome.	Not required in this instance
S15	435	Focus development away from Green Belt and Edinburgh and towards regional towns	Development must located in and near to Edinburgh to support the economy and reduce the need to travel.	Not required in this instance
S16	164	Need to acknowledge housing in growing economy	This is acknowledged.	Not required in this instance
T - Table 3.1				
T1	178, 184, 190, 196	The title of Table 3.1 is misleading.	Table 3.1 sets out the housing land requirement for each LDP area as required by SDP Policy 5. The title is in accordance with this.	Not required in this instance
T2	25	The table should breakdown the figures in the period 2024 - 2032 by authority.	This is not required by the approved SDP.	Not required in this instance
T3	27, 58, 65, 228, 243, 468	Agree with Table 3.1. The allocations are consistent with the numbers in the Scottish Ministers approval letter. Agree there is justification for this allocation.	Noted.	Not required in this instance
T4	551	The greatest challenge lies at the local level where sites for additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing take a proportion of the City's need and demand.	Noted.	Not required in this instance
U - Table 3.2				
U1	521, 531, 534, 542, 523, 532	Including these figures goes beyond what is required by SPP and SDP Policy 5. There is a risk these figures could be misinterpreted as housing land shortfalls.	The additional allowances set out in table 3.2 are for indicative purposes. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 and the Supplementary Guidance.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
U2	15, 21	Table should be renamed 'Additional Requirement' to comply with SDP and SPP.	The table does not set out an additional requirement. It is the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1.	Not required in this instance
U3	15, 21	The figures in table 3.2 are too low.	The figures are based on capacity assessment work undertaken in conjunction with the opportunities and constraints analysis. They will be re-assessed as part of LDP preparation.	Not required in this instance
U4	138, 102	Question the wisdom of Outwith SDA Allowances just in Edinburgh, Fife and the Scottish Borders. There are many small sites across the SESplan area which could contribute.	Development is to be focussed in SDAs where there is capacity that is consistent with the spatial strategy and aims of the SDP.	Not required in this instance
U5	21	There is no mechanism within the SDP that allows the separation of within and outwith SDAs.	This is set out in approved SDP paragraph 116 and Policy 7.	Not required in this instance
U6	532	Table 3.2 should be deleted.	Table 3.2 sets out the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1. These will be re-assessed during LDP preparation. The table will not be deleted.	Not required in this instance
U7	495	Need for guidance on locations of development outside SDAs	Exact locations will not be set out. Policy 7 in the Approved SDP sets out criteria for the assessment of sites outside SDAs. The supplementary guidance cannot identify other SDAs or contradict the spatial strategy set out in the Approved SDP.	Not required in this instance
U8	115	The Allowances would be better defined as SDAs.	The allowances are an indication, at the present time, of the potential contribution each SDA could make towards the housing land requirement. They will be re-assessed during LDP preparation.	Not required in this instance
U9	28, 59, 66, 114, 131, 132, 227, 244, 415, 420, 442, 464, 86, 133, 218, 226, 245, 549	Agree with Table 3.2.	Noted.	Not required in this instance
U10	52, 140, 217, 304, 309, 340, 379, 404, 141, 147, 284, 305, 341, 362, 389, 405, 416, 424, 560	Does not agree with Table 3.2.	Table 3.2 sets out the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1. These will be re-assessed during LDP preparation. The figures within the table were based on the assessments detailed in the Technical Note.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
V - Windfall				
V1	13, 19,162, 168, 308, 14, 20, 163, 533, 544, 509, 531, 542, 167, 508, 532, 543	The figures are based on unsubstantiated assertions and overstated.	The figures are based on a through analysis of windfall trends in each member authority area. Policy 5 of the approved SDP allows for a justified allowance from windfall sites.	Not required in this instance

Summary of Main Issues (Member Authority)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sq/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W - City of Edinburgh				
W1	104, 426, 123, 139, 233, 439, 148, 150, 428, 402, 565, 569, 202, 350, 437, 567, 124, 146, 231, 421, 422, 568, 359, 421	Cammo should not be included within West Edinburgh since it has no access to the tram, experiences severe traffic congestion and has infrastructure constraints (education and transport).	The exact boundaries and sites within the West Edinburgh Strategic Development Area (SDA) is a matter for the City of Edinburgh Local Development Plan.	Not required in this instance
W2	125	Question need for Cammo site given uncompleted sites across the city	There is an insufficient supply of existing sites to meet housing need requirements over the plan period.	Not required in this instance
W3	150, 571, 350, 437, 325	Development would affect setting and environment of Cammo estate	The exact boundaries and sites within the West Edinburgh SDA a is a matter for the City of Edinburgh LDP.	Not required in this instance
W4	411, 333, 324, 480, 336, 331, 90, 137, 169, 394, 322, 110, 321, 320, 343, 249, 96, 487, 49, 425, 453, 349, 91, 390, 241, 64, 337, 400, 355, 585, 296, 490	Balerno cannot accommodate new development due to infrastructure capacity issues (education and transport). The Lanark Road is congested.	The allocation of sites outwith SDAs is a matter for the City of Edinburgh LDP.	Not required in this instance
W5	333, 90, 336, 137, 320, 343, 391, 249, 487, 49, 425, 332, 241, 64, 328, 337, 355, 585	Balerno is not accessible to employment. Accessible areas in city should be developed instead.	Table 8.19 of the technical note identifies that South West Edinburgh is the 5th most accessible Strategic Assessment Area to employment in the entire SESplan Region.	Not required in this instance
W6	113, 162, 168, 261, 274, 364, 370, 408, 450, 496, 519, 528, 302, 164, 499, 483, 484, 454	The need and demand for housing is predominately generated by Edinburgh and should be accommodated there.	The majority of the housing requirement set out in the Supplementary Guidance will be provided in Edinburgh or its hinterland.	Not required in this instance
W7	527, 529, 363, 540, 517	No evidence of environment or infrastructure reasons why Edinburgh cannot meet need.	These are set out in the spatial strategy assessment tables in the Technical Note.	Not required in this instance
W8	234, 295, 403, 145, 204, 233, 250, 286, 297, 127, 406, 465	The figures for Edinburgh are too high.	Edinburgh is a source of both housing need and demand. Where environmental and infrastructure considerations allow and where consistent with the approved SDP, a generous supply of housing need should be met there.	Not required in this instance
W9	267, 450, 302, 269, 288, 451, 456, 572, 454	More land should be identified to the west of Edinburgh.	West Edinburgh is identified as an SDA in the approved SDP	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W10	201, 444, 388, 443, 404, 389	The allocation of 2,700 dwellings in West Edinburgh should be removed or substantially reduced due to the potential impacts on traffic and education constraints.	West Edinburgh is identified as an SDA in the approved SDP. The exact level of housing allocated in the SDA will be set out the Edinburgh LDP. In the balance of considerations, which include infrastructure, West Edinburgh is considered a suitable and sustainable location for a strategic level of development.	Not required in this instance
W11	202	Solutions to accommodate growth in West Edinburgh will not be effective.	The solutions are being refined in the City of Edinburgh LDP and through work with Transport Scotland.	Not required in this instance
W12	105	The green belt around West Edinburgh should remain as it is.	SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land in West Edinburgh may be needed to meet housing requirements.	Not required in this instance
W13	251	West Edinburgh bears a disproportionate share of proposed development.	The development of West Edinburgh is part of a long term strategy. It is not the largest Strategic Development Area set out in the SDP or compared to strategic sites in existing plans.	Not required in this instance
W14	203, 446	Garden District preferable to West Edinburgh	The Garden District is not a SDA and it is not within the remit of the Supplementray Guidance to identify further SDAs. Its suitability to meet housing requirements will be assessed in the Edinburgh LDP.	Not required in this instance
W15	535	Garden District more effective than diverting need to other authorities.	The Garden District is not a SDA and it is not within the remit of the Supplementray Guidance to identify further SDAs. Its suitability to meet housing requirements will be assessed in the Edinburgh LDP.	Not required in this instance
W16	261, 262	Further land within the South East and West Edinburgh SDAs requires to be considered for release along with further land within the North West and South West areas linked to transport corridors.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. The South East and West Edinburgh SDAs have been identified as having further development potential in the Supplementary Guidance in table 3.2. Subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical Note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W17	236, 310	Allocating Additional Allowances within SAAs 9 and 11 is a departure from the approved SDP which sets the 13 SDAs as the primary locations for development. This strategy is not properly justified.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. The South East and West Edinburgh SDAs have been identified as having further development potential in the Supplementary Guidance in table 3.2. Subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical Note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W18	263	The allowances within North West and South West Edinburgh should be increased.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. Whilst the review of environmental capacities and constraints and LDP analysis indicated that there is strategic potential in these locations, the Supplementary Guidance cannot identify these areas as SDAs. New housing in these areas is a matter for the Edinburgh LDP.	Not required in this instance
W19	388, 359, 432	The numbers for South East and West Edinburgh should be reduced.	These areas have been identified as having development capacity that can be accommodated sustainably to contribute towards meeting housing need. Both areas are identified as SDAs in the approved SDP.	Not required in this instance
W20	447, 164	South East Edinburgh is artificially constrained and this is not justified	South East Edinburgh will deliver significant levels of development. It is not being artificially constrained.	Not required in this instance
W21	30	South East Edinburgh road capacity insufficient.	Both the SDP and the Edinburgh LDP are accompanied by transport appraisals which consider road capacity.	Not required in this instance
W22	482, 483	Supportive of the identification of North West Edinburgh (SAA9).	Noted.	Not required in this instance
W23	395	South West Edinburgh is not suitable for strategic growth.	Table 8.19 of the technical identifies that it has potential to accommodate development on a strategic scale. The allocation of development in this area is a matter for the Edinburgh LDP.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W24	521, 534, 523, 536	Recommend the addition of two SDAs - North West Edinburgh (1,000 homes) and South West Edinburgh (1,500 homes).	The Supplementary Guidance cannot identify further SDAs. The spatial strategy for SESplan is set out in the approved SDP. However, subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W25	267, 274, 308, 269	Flexibility should be added to allow for the significant amounts of housing at the Waterfront to come forward should the renewable energy development not proceed as planned. The contribution of Leith Docks needs to be clarified.	The focus is on delivering the approved strategy. If this situation occurs, alternative strategies will be analysed.	Not required in this instance
W26	11, 22, 547, 552	Flatted development at the Waterfront is not deliverable or marketable	Recent HLA information sets out that the waterfront will deliver during and beyond the plan period. The strategy in Edinburgh ensures that the strategy is not dependant on one location.	Not required in this instance
W27	211	The 2,500 Outwith SDAs is inappropriate.	It is in accordance with the approved SDP and is based on a capacity, opportunity and constraints assessment.	Not required in this instance
W28	29	Another SDA should be identified within Edinburgh to accommodate the 2,500 Outwith SDA Allowance.	The Supplementary Guidance cannot identify further SDAs. The spatial strategy for SESplan is set out in the approved SDP. However, subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W29	564	Edinburgh should seek deliver build for market rent properties.	Issue for exploration in the Edinburgh LDP and future housing market analysis.	Not required in this instance
W30	482	Further detail should be provided on the barriers and constraints to development in the Edinburgh City area.	Set out in the Technical Note, its appendices and the evidence base produced for the SDP and the Edinburgh LDP.	Not required in this instance
W31	31	Road improvements in and around Edinburgh required	This is acknowledged. The SDP and Action Programme sets out the strategic improvements that are required. More detail will be set out in the Edinburgh LDP and its accompanying Action Programme.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W32	497, 498	On what basis has the reprogramming of Brownfield land within Edinburgh been undertaken.	In accordance with SPP and NPF3.	Not required in this instance
W33	232	Support some of CEC demand being met elsewhere	Noted.	Not required in this instance
W34	548	Further planned expansion of housing allocations is feasible and desirable in the City of Edinburgh area.	The housing requirement for Edinburgh is based on meeting need and demand whilst recognising the infrastructure and environmental capacities and constraints.	Not required in this instance
W35	126	Plans should improve Edinburgh	Development presents opportunities to make social, environment and economic improvements to an area.	Not required in this instance
X - East Lothian				
X1	602, 599, 600, 603, 152, 601, 604, 605, 606	Development of Goshen farm is not justified because of: infrastructure capacity, transport capacity, cultural and heritage impacts, sustainability, and environmental impacts. Other areas in East Lothian should be considered instead.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X2	184, 196, 216, 555, 220, 551, 217	A greater proportion of Edinburgh's need and demand should be directed to East Lothian.	The East Lothian housing requirement recognises its role and position adjacent to Edinburgh.	Not required in this instance
X3	538, 215, 525	Additional capacity in East Lothian not explained / arbitrary.	The requirement of East Lothian was based on the assessment of constraints, capacities and opportunities as well as site capacity and identification work been undertaken for the East Lothian LDP. However, it is accepted that the <u>Technical Note could be clearer in this matter.</u>	Clarifications to sections 5 and 6 of the Technical Note for clarity is required.
X4	151	Consider sites in Western East Lothian that do not affect area around Wallyford.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X5	35	East Lothian appears to have the capacity to take more as it is closely situated to Edinburgh where most people will take up employment.	The East Lothian housing requirement recognises its role and position adjacent to Edinburgh. The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X6	596	North Berwick cannot accommodate further development without significant impact on infrastructure and the character of the place. New development should only be smaller homes for local people.	North Berwick is outside of the East Lothian SDA. The comments will be forwarded to East Lothian Council.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
X7	51, 9	East Lothian is a rural county which is in danger of becoming urbanised.	The SDP and Supplementary Guidance does not seek to urbanise rural areas. The exact location of housing within East Lothian is a matter for the East Lothian LDP.	Not required in this instance
X8	87	Infrastructure capacity and environmental constraints will restrict development	Constraints, capacities and opportunities were considered in setting the housing requirements for SESplan LDP areas.	Not required in this instance
X9	553	Goshen Farm is located within the East Lothian SDA and can accommodate 1,200 units.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X10	287	Distribution of East Lothian's allocation should be made to other areas such as the Borders, Edinburgh's villages and the west airport side.	The housing requirement sets an appropriate balance, to which East Lothian is required to contribute towards.	Not required in this instance
X11	83	The coastal strip has the most effective and faster public transport links and should be the focus of some allocations.	The coastal strip is not as accessible as other parts of East Lothian.	Not required in this instance
X12	253	East Lothian has already developed considerable housing in the period 2009 - 2019.	Further housing delivery will be required to meet the need for additional housing.	Not required in this instance
X13	465	Question the delivery of the East Lothian requirement	The requirement of East Lothian was based on the assessment of constraints and opportunities as well as site capacity and identification work been undertaken for the East Lothian LDP.	Not required in this instance
Y - Fife				
Y1	35, 274, 338, 345, 360, 514, 279, 352, 598, 502, 503, 516, 575, 276, 346, 353, 272, 574, 465	The figures for Fife are too high.	Fife is a source of both housing need and demand. The Fife requirement was based on the assessment of constraints, capacities and opportunities as well as site capacity and identification work been undertaken for the Fife LDP.	Not required in this instance
Y2	179, 185, 191, 197, 470, 180, 262	The Ore / Upper Leven Valley is not deliverable and should be deleted or reduced to not more than 1,220 units and the remainder added to the Outwith SDA allowance.	This would not be in accordance with the Spatial Strategy set out in the approved SDP. This is based on a long term regeneration strategy and not short term delivery issues.	Not required in this instance
Y3	273, 597, 153, 396, 354, 347, 335	Aberdour cannot accommodate more development without detrimental impacts to its character and infrastructure as well as increased traffic congestion.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Y4	521, 534, 523, 536	Recommend the addition of a new SDA - The Fife Bridgehead. This would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and include an allocation of 2,170 homes. This would be made up of 950 deducted from the Outwith SDAs Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA.	The Supplementary Guidance cannot identify additional SDAs. The approved spatial strategy is set out in the approved SDP. Development of the Ore/Upper Leven Valley based on a long term regeneration strategy.	Not required in this instance
Y5	184, 190, 196	A greater proportion of Edinburgh's need and demand should be directed to Fife.	This would not be considered sustainable.	Not required in this instance
Y6	366, 372, 392	The Outwith SDA allowance should be deleted.	It is in accordance with the approved SDP and is based on a capacity, opportunity and constraints assessment. The level of allowance will be reviewed during LDP preparation.	Not required in this instance
Y7	186, 192, 198	A significant proportion if not all of the additional 3,220 units proposed within the Ore / Upper Leven Valley should be for sites outwith SDAs.	This would not be in accordance with the Spatial Strategy set out in the Approved SDP. Development of the Ore/Upper Leven Valley based on a long term regeneration strategy.	Not required in this instance
Y8	354, 347	Lower the Fife requirement outside SDAs.	The allowance will be reviewed during LDP preparation in accordance with the SDP.	Not required in this instance
Y9	12, 37	Question delivery in Dunfermline.	This is based on the delivery of an approved strategy.	Not required in this instance
Y10	97	The figures for Fife have been artificially inflated by using the GRO estimates which are not based on reality and by accommodating Edinburgh's need and demand.	The Housing Need and Demand Assessment figures were considered as robust and credible by the Scottish Government.	Not required in this instance
Y11	98	It is for Fife to determine the breakdown by SDA in a manner that's open to public scrutiny.	The allowances will be reviewed during LDP preparation. The sites within SDAs is a matter for the Fife LDP.	Not required in this instance
Y12	262	A reduced allowance within the North Dunfermline SDA should be made due to deliverability concerns within the pre 2019 period.	The allowances will be reviewed during LDP preparation.	Not required in this instance
Y13	375	Fife will provide 43% of housing development outwith SDAs. This is extremely high. Query whether this is justified or proportionate.	The level of allowances will be reviewed during LDP preparation. The identification of areas outwith SDAs contributing towards meeting the housing requirements is in accords with the approved SDP.	Not required in this instance
Y14	548	Question whether Fife will be able to deliver.	The SDP and Supplementary Guidance focuses on delivering a long term strategy. The Housing Need and Demand Assessment indicates that there is a high level of housing need in Fife.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Y15	36	There are other areas closer to the M90 that haven't been considered e.g. Kelty, Kinross and Southern Dunfermline. The North Dunfermline SDA is overtly biased to one area of Dunfermline.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y16	471	Agrees with the identification of 1,950 units outwith SDAs provided this is justified in the HNDA. It will be important these are allocated on the right sites that are effective and deliverable.	The allowance will be reviewed during LDP preparation.	Not required in this instance
Y17	17, 18	Strategic villages such as Crossford to the west of Dunfermline could accommodate significant growth with no impact on the proposed green belt for Dunfermline. The Supplmentray Guidance should specifically identify the Dunfermline Western Villages as a strategic location.	The spatial strategy is set out in the approved SDP. The supplementary Guidance cannot identify further SDAs. The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y18	38	Vacant property and land in Dunfermline Town Centre should be developed.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y19	280	Coastal villages should not be identified for new development.	Coastal Fife is not identified as part of a Strategic Development Area. The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y20	594	Support for Fife Council's continued position on Dunfermline's expansion to the West, North and North West.	Noted.	Not required in this instance
Z - Midlothian				
Z1	130, 184, 190, 196, 261, 408, 93	The figures for Midlothian are too high.	The requirement for Midlothian is based on the continued delivery of an existing and approved long term delivery strategy. A strategic amount of Midlothian's requirement will be met within South East Edinburgh.	Not required in this instance
Z2	572	The additional allowances in the A7 / A68 / Borders Rail Corridor should be increased.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance
Z3	251, 316, 315	The A701 Corridor could accommodate far more development.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Z4	317	Additional Allowances Outwith SDAs should be directed to the SDAs, in particular the A701 Corridor.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance
Z5	598	To much redistribution from CEC to MLC	A significant proportion of Midlothian's requirement will be delivered in the South East Edinburgh SDA. These sites will be accessible to employment and other major generators of travel within Edinburgh and Midlothian. This strategy is set out in the approved SDP and is recognised in NPF3.	Not required in this instance
Z6	212	Requirement not deliverable.	The requirement for Midlothian is based on the continued delivery of an existing and approved long term delivery strategy.	Not required in this instance
Z7	92	More thought required on transport in Midlothian to accommodate development.	Further work on cumulative transport impacts and mitigations is underway.	Not required in this instance
Z8	93	The number of houses allocated to Bilston is inappropriate.	The detail of individual sites within Midlothian is a matter for the Midlothian LDP.	Not required in this instance
Z9	318	Allowances within the A701 corridor are deliverable.	Acknowledged.	Not required in this instance
AA - Scottish Borders				
AA1	184, 190, 196, 261, 315, 533, 499, 544, 545	The Scottish Borders figures are too high/in excess of need and won't be delivered	Housing demand in the Scottish Borders will increase with the opening of the Borders railway allowing sustainable travel to Midlothian and Edinburgh. The Scottish Borders housing requirement reflects a long term strategy.	Not required in this instance
AA2	35, 338, 467, 473	Scottish Borders appears to be under distributed, especially with the new rail link.	Housing will be delivered in the Scottish Borders to build on the opportunities created by the Scottish Borders Railway.	Not required in this instance
AA3	530, 541, 598	It is flawed to rely on the Scottish Borders to such an extent.	The strategy does not 'rely' on the Scottish Borders. Only 12% of the overall SESplan housing requirement is allocated to the Scottish Borders.	Not required in this instance
AA4	84, 85	There should be a greater allocation in the Eastern Borders associated with a new station at or near Reston.	Although Reston Station has not yet been confirmed, there is a significant allocation of housing land with the Scottish Borders LDP.	Not required in this instance
AA5	230	The scale of new housing development in the Eastern Borders SDA should take into account Berwick-Upon-Tweed's local 'strategic' role. 900 additional houses are proposed in Berwick over the period to 2031.	The role and location of Berwick-upon-Tweed was recognised in the creation of the SESplan spatial strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AA6	607	The increased housing requirements affecting Peebles are excessive.	In the Supplementary Guidance the Western Borders SDA has an additional allowance of 110 units. The location within this SDA is a matter for the Scottish Borders LDP.	Not required in this instance
AB - West Lothian				
AB1	274, 212, 213, 586, 587	West Lothian could accommodate more housing.	The housing requirement for West Lothian is based on a balance of considerations, studies and analysis. This level of development is considered appropriate. Further development in West Lothian beyond current SDP requirements set out in the supplementary guidance could not be accommodated at this time and would impact on the delivery of the proposed strategy. It will be for the West Lothian LDP to determine the location of development to meet the requirements of the SDP.	Not required in this instance
AB2	32, 113, 130, 558, 33	The figures for West Lothian are too high.	The housing requirement for West Lothian is based on a balance of considerations, studies and analysis.	Not required in this instance
AB3	11, 22, 24, 23, 214	Winchburgh is a sustainable location and has capacity to accommodate more development.	Subject to the delivery of the rail station, the sustainability of Winchburgh is recognised. Details of sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB4	552	There is a requirement for expansion in the Edinburgh / West Lothian corridor alongside public transport links.	The delivery of West Edinburgh and new development at Broxburn and Winchburgh is based around this strategy.	Not required in this instance
AB5	588	Despite the corridor through West Edinburgh into West Lothian being a primary economic driver for the region, the requirement assessed for West Lothian appears to be very conservative.	The requirement for West Lothian will require housing delivery that is in excess of achieved delivery rates seen in the 21st century. A significant level of this development will be delivered in eastern West Lothian.	Not required in this instance
AB6	209	It is not accepted that there are infrastructure constraints in West Lothian sufficient to downgrade its importance. Infrastructure is being provided in Winchburgh.	Winchburgh will contribute to meeting West Lothian's housing requirement. The detail of this is a matter for the West Lothian LDP. Constraints in West Lothian are set out in the appendices of the Technical Note.	Not required in this instance
AB7	558	The proportion of housing required from West Lothian is not supported by the availability of infrastructure.	A review of infrastructure constraints in West Lothian was undertaken during the preparation of this Supplementary Guidance. A full analysis of the requirements and a delivery strategy, including infrastructure provision, will be set out in the West Lothian LDP and its accompanying Action Programme.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AB8	591	Developmment in west West Lothian is less deliverable	Detail of the individual sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB9	563	Delivery of existing sites in West Lothian is unlikely within the plan period.	The delivery of existing sites will be reviewed in the preparation of the West Lothian LDP. The Supplementray Guidance is informed by Housing Land Audit 2012 agreed with the housebuilding industry and advises on proposed phasing of sites.	Not required in this instance
AB10	213	Review West Lothian infrastructure difficulties and promotes additional land release at Winchburgh.	A review of infrastructure constraints in West Lothian was undertaken during the preparation of this Supplementary Guidance. A full analysis of the requirements and a delivery strategy will be set out in the West Lothian LDP and its accompanying Action Programme. Detail of the individual sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB11	589	Do not agree that West Lothian is in any way self contained. Concerned that sufficient housing to supply the Cross Plan requirement created by the Gyle, Airport, Newbridge, Livingston employment corridor has not been adequately addressed.	The requirement for West Lothian will require housing delivery that is in excess of achieved delivery rates seen in the 21st century. It will be for the West Lothian LDP to identify the sites for future development and infrastructure requirements to support development.	Not required in this instance

Summary of Main Issues (Other)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AC - No Further Comment				
AC1	254	Question 3 - Nothing to add. See response 253.	No response required.	Not required in this instance
AC2	515	Question 3 - No specific opinion.	No response required.	Not required in this instance
AC3	255	Question 4 - Nothin to add. See response 253.	No response required.	Not required in this instance
AC4	554	Question 4 - No response.	No response required.	Not required in this instance
AD - Duplicate Response				
AD1	410	Duplicate response. See response 408.	No response required.	Not required in this instance
AD2	491	Duplicate response. See response 490.	No response required.	Not required in this instance

APPENDIX C Proposed Editorial Changes to the draft Supplementary Guidance on
Housing Land

Supplementary Guidance Housing Land – Proposed Editorial Changes

Table A – Supplementary Guidance Proposed Editorial Changes

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Changes
2.2	“...a significant proportion of housing need and demand generated in the City of Edinburgh may need to be met in the other five LDP areas.”	“...a significant proportion of housing need and demand generated in the City of Edinburgh may will need to be met in the other five LDP areas.”	Removes uncertainty and is consistent with paragraph 110 of the SDP.
Table 3.2		Insert total row	Clarification of the scale of the additional allowances.
3.5	Replace paragraph	The distribution of the overall housing land requirement by LDP area builds on, and complements, existing committed development in accordance with the approved Spatial Strategy of the SDP. Capacity for development, that can be accommodated sustainably, has been identified where need arises and demand is found. This has had to take account of the analysis of the opportunities, constraints and capacities. This identified that there is insufficient sustainable capacity within the City of Edinburgh boundaries to meet a significant proportion of the demand for housing that arises there. Therefore, the shortfall has had to be made up in the other five LDP areas. This has either been located in areas closest to Edinburgh (e.g. Midlothian will deliver 4,000 units in the South East Edinburgh SDA) or to build on sustainable development opportunities, such as the opening of the Borders Railway. Full detail on how all the factors were considered in the Supplementary Guidance preparation process are set out in the accompanying Technical Note.	Additional reasoning and justification for the housing requirements set out in Table 3.1
3.11	In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles), 6 (Housing Land Flexibility) and 7 (Maintaining a Five Year Housing Land Supply) must be adhered to and met by each of the six LDPs.	In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles) and 6 (Housing Land Flexibility) must be adhered to and met by each of the six LDPs. Policy 7 (Maintaining a Five Year Housing Land Supply) enables LDPs to allocate sites outwith Strategic Development Areas, subject to satisfying the policy criteria.	Clarity in the Supplementary Guidance Document of the role of land outwith SDAs.

Table B – Supplementary Guidance Technical Note Proposed Editorial Changes

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Change
Table 3.2		Remove footnote from table 3.2	Included as part of re-assessed land supply.
4.16	A step change in the level of housing completions by house builders will be required to deliver the HNDA requirement over the period 2009 - 2024.	A step change in the level of housing completions by house builders will be required to deliver the housing requirement over the period 2009 – 2024 (average of 7,180 dwellings per annum).	Additional text to give in context of the scale in increase of housing deliver required.
5.10	Following the refresh of the Spatial Strategy Assessment, each member authority determined that the total additional allowances (the phasing may have been amended).....	Following the refresh of the Spatial Strategy Assessment, each member authority determined that the capacity that made up the total additional allowances (the phasing may have been amended)....	Clarification that it was the capacity that was re-assessed.
5.13 Point 2	Additional text after “development sustainably.”	This is accordance with SDP paragraphs 113 and 116.	For clarification that the adopted SDP allows for LDPs to allocate land outwith SDAs.
5.14	Additional text at the end of the paragraph	Following the summary of the process for each LDP Area, a table shows the additional development capacity over the Established Land Supply. This includes the additional allowances previously set out in the Proposed SDP.	Clarifiaction of the process undertaken.
Table 5.3 Title	Additional Allowances in the City of Edinburgh	Additional Development Capacity in the City of Edinburgh	Correct definition of table
Table 5.4 Title	Additional Allowances in the East Lothian	Additional Development Capacity in East Lothian	Correct definition of table
Table 5.5 Title	Additional Allowances in the Fife	Additional Development Capacity in Fife	Correct definition of table
Table 5.6 Title	Additional Allowances in the Midlothian	Additional Development Capacity in Midlothian	Correct definition of table
Table 5.7 Title	Additional Allowances in the Scottish Borders	Additional Development Capacity in the Scottish Borders	Correct definition of table
Table 5.3 Title	Additional Allowances in the West Lothian	Additional Development Capacity in West Lothian	Correct definition of table
Paragraph 6.4	On the basis of the considerations above, Table 6.2 below sets out that the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.	On the basis of the considerations above, and the capacity analysis undertaken in section 5 , Table 6.2 below sets out the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.	Clarification

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Change
New Paragraph after 6.5		Firstly, the distribution of the Housing Land Requirement must be in accordance with the SESplan Spatial Strategy set out in the approved SDP. It builds on existing committed development, focussing further development along preferred corridors optimising connectivity and access to services and jobs.	Based on the content of some consultation responses, there is a need to remind that the Supplementary Guidance must accord with the approved spatial strategy.
Paragraph 6.8	In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 6.	In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 6 5.	Correction
Table 8.17	Recommended as Preferred Location for Development in Original Assessment - NO	Recommended as Preferred Location for Development in Original Assessment - YES	Correction
Table 8.19	Recommended as Preferred Location for Development in Original Assessment - NO	Recommended as Preferred Location for Development in Original Assessment - YES	Correction

Contents

1 Introduction	2
2 Policy Context	3
3 Housing Land Requirement	4
4 Glossary	8

1 Introduction

1 Introduction

1.1 This Supplementary Guidance is prepared under Section 22 of the Planning etc (Scotland) Act 2006 in connection with the Strategic Development Plan (SDP) for South East Scotland as approved by Scottish Ministers on 27 June 2013. The adopted Supplementary Guidance will form part of the development plan.

Purpose

1.2 The purpose of the Supplementary Guidance is to provide detailed further information in support of SDP Policy 5 (Housing Land). The further information will provide direction for Local Development Plans (LDPs) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian).

Preparation

1.3 The Supplementary Guidance is based on an analysis of opportunities and of the infrastructure and environmental capacities and constraints. A Technical Note has been prepared in support of this Supplementary Guidance. The Technical Note contains the background information and report of survey work undertaken to prepare the Supplementary Guidance itself. A Strategic Environmental Assessment (SEA) has been undertaken for the Supplementary Guidance. This is set out in a separate document.

1.4 The Supplementary Guidance, supporting Technical Note and SEA have been prepared in consultation with the six member authorities.

Policy Context 2

2 Policy Context

2.1 Under the terms of the Planning etc (Scotland) Act 2006, the six member authorities that make up the SESplan Strategic Development Planning Authority (SDPA) are required to prepare an SDP for South East Scotland. The first SDP, which was approved by Scottish Ministers on 27 June 2013, sets clear parameters for each of the six LDPs covering the period to 2032. The spatial strategy set out in the approved SDP builds on approaches in existing development plans focusing development along preferred corridors optimising connectivity and access to services and jobs. Policy 1A (Spatial Strategy Development Locations) identifies five sub regional areas (Regional Core, East Coast, Fife Forth, Midlothian / Borders, West Lothian). Within these, further development will be focused in 13 Strategic Development Areas (SDAs) acting as the primary locations for growth and investment:

- West Edinburgh;
- South East Edinburgh;
- Edinburgh City Centre;
- Edinburgh Waterfront;
- East Lothian;
- Eastern Borders;
- North Dunfermline;
- Ore / Upper Leven Valley;
- A7 / A68 / Borders Rail Corridor;
- A701 Corridor;
- Central Borders;
- Western Borders; and
- West Lothian.

2.2 SDP Policy 5 (Housing Land) identifies that, for the period from 2009 up to 2024, there is a requirement for sufficient housing land to be allocated so as to enable 107,545 houses to be built across the SESplan area, including on land which is currently committed for housing development. Policy 5 also indicates that Supplementary Guidance will be prepared to provide detailed further information as to how much of the requirement should be met in each of the six member authority areas, both in the period 2009 - 2019 and in the period 2019 - 2024. The Supplementary Guidance is to be based on an analysis of opportunities and of the infrastructure and environmental capacities and constraints. The approved SDP also notes that, due to environmental constraints and other restrictions within the City's boundaries, a significant proportion of housing need and demand generated in the City of Edinburgh Council area will need to be met in the other five LDP areas. The accompanying Technical Note sets out the survey and analysis work undertaken.

2.3 The Supplementary Guidance has been prepared in accordance with other relevant SDP policies including Policy 1B (The Spatial Strategy Development Principles) and Policies 6 and 7 (Housing Land Flexibility and Maintaining a Five Year Housing Land Supply).

3 Housing Land Requirement

3 Housing Land Requirement

3.1 The SDP must ensure that the housing needs and demand of the SESplan area can be met. As detailed in the approved SDP and as required by national policy, it is the role of the SDP to provide the framework for the six LDPs within the SESplan area to allocate sufficient land for housing development.

3.2 Across the SESplan area, there is a requirement for a total of 155,544 houses to be provided over the period to 2032. This total requirement as identified by the Housing Needs and Demand Assessment (HNDA) (see Table 2, Assessed Housing Requirements by Plan Period contained within the SDP) is to be distributed across the three SDP plan periods 2009 - 2019 (74,835 houses), 2019 - 2024 (32,710 houses) and 2024 - 2032 (47,999 houses). Sufficient land must therefore be identified across the six LDP areas to accommodate the housing land requirement over the period to 2024, a total of 107,545 units.

3.3 As set out in the accompanying Technical Note, in order to identify sufficient land to accommodate the housing land requirement a review of the opportunities and of the environmental and infrastructure capacities and constraints has been undertaken. This has included a refresh and review of data and information collated to support the approved SDP and has meant an update of the established land supply based on Housing Land Audit (HLA) 2012 instead of HLA 2010, a review of the output from all brownfield sites in the established supply and the housing market in terms of viability and deliverability and a refresh of the Spatial Strategy Assessment undertaken to support the Proposed Plan. The latter included a review of the entire SESplan area against criteria such as infrastructure capacity, land availability, green belt and transport.

3.4 The housing land requirement set out in this Supplementary Guidance must be consistent with the approved SDP and in particular the spatial strategy by prioritising brownfield land and locating additional development within the identified SDAs in the first instance. The policy principles for the location of development as set out in Scottish Planning Policy (SPP) and contributing towards successful place making have informed the requirement by LDP area. The requirement must also balance the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis, as well as market and deliverability considerations.

3.5 The distribution of the overall housing land requirement by LDP area builds on, and complements, existing committed development in accordance with the approved Spatial Strategy of the SDP. Capacity for development, that can be accommodated sustainably, has been identified where need arises and demand is found. This has had to take account of the analysis of the opportunities, constraints and capacities. This identified that there is insufficient sustainable capacity within the City of Edinburgh boundaries to meet a significant proportion of the demand for housing that arises there. Therefore, the shortfall has had to be made up in the other five LDP areas. This has either been located in areas closest to Edinburgh (e.g. Midlothian will deliver 4,000 units in the South East Edinburgh SDA) or to build on sustainable development opportunities, such as the opening of the Borders Railway. Full details on how all the factors were considered in the Supplementary Guidance preparation process are set out in the accompanying Technical Note.

Housing Land Requirement 3

3.6 Based on the outcomes of the analysis undertaken and the considerations set out above, the distribution of the housing land requirement of 107,545 units in the periods 2009 - 2019 and 2019 - 2024 is set out in Table 3.1 below. LDPs must identify sufficient sites and locations to accommodate the housing land requirements set out in Table 3.1. Please note that the figures have been rounded to the nearest 10.

Table 3.1 Housing Land Requirement by Local Development Plan Area

Local Development Plan	2009 - 2019	2019 - 2024
City of Edinburgh	22,300	7,210
East Lothian	6,250	3,800
Fife	17,140	7,430
Midlothian	8,080	4,410
Scottish Borders	9,650	3,280
West Lothian	11,420	6,590
SESplan Totals 2009 - 2019 and 2019 - 2024	74,840	32,720
SESplan Total 2009 - 2024	107,560	

3.7 Most of the new houses required are expected to be built on land which is already committed for development either because it is already allocated for that purpose or because planning permission has been granted. Based on HLA 2012 and including an allowance for constrained and windfall sites to come forward and for demolitions, the total supply across the SESplan area to 2024 is 83,207 units. To meet the total requirement of 107,545 units, it is therefore expected that LDPs will need to identify land to accommodate at least an additional 24,338 units.

3.8 The extent to which sites already identified for housing (i.e. the 83,207 units) remain capable of delivering house completions by 2024 must be re-assessed in LDPs (SDP paragraph 23). Any changes in this figure will have implications for the amount of additional housing land needed. Where necessary, alternative housing sites will need to be allocated.

3.9 Consistent with SPP and paragraph 113 of the approved SDP, LDPs should give priority to brownfield sites within existing built up areas when allocating new sites for housing development. Where additional land is required, sites should first be sought within the identified SDAs. No significant new brownfield housing opportunities have been identified at this time. Based on an analysis undertaken of opportunities and constraints within SDAs, Table 3.2 indicates the potential contribution that each SDA could make towards meeting the housing requirement. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 have been met.

3 Housing Land Requirement

3.10 The analysis undertaken in preparing the Supplementary Guidance suggests that additional sites will need to be allocated outwith SDAs and that the most appropriate locations for these are in the City of Edinburgh, Fife and the Scottish Borders. An indication of how much land may be needed outwith SDAs and how this could be distributed is also included in Table 3.2. LDPs will include a detailed assessment of the amount of housing land to be allocated outwith SDAs and consideration of potential sites.

3.11 New development proposals will complement and not undermine the delivery of existing committed development. In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles) and 6 (Housing Land Flexibility) must be adhered to and met by each of the six LDPs. Policy 7 (Maintaining a Five Year Housing Land Supply) enables LDPs to allocate sites outwith SDAs, subject to satisfying the policy criteria.

Table 3.2 Additional Allowances Within and Outwith Strategic Development Areas

Strategic Development Area	Additional Allowances
West Edinburgh	2,700
South East Edinburgh	2,950 (2,500 in City of Edinburgh and 450 in Midlothian)
Edinburgh City Centre	0
Edinburgh Waterfront	0
East Lothian	3,560
North Dunfermline	2,630
Ore / Upper Leven Valley	3,220
A7 / A68 / Borders Rail Corridor	1,350
A701 Corridor	750
Eastern Borders	160
Central Borders	290
Western Borders	110
West Lothian	2,130
SESplan Within Strategic Development Areas	19,850
Outwith Strategic Development Areas	Additional Allowances
City of Edinburgh	2,500
Fife	1,950

Housing Land Requirement 3

Strategic Development Area	Additional Allowances
Scottish Borders	80
SESplan Outwith Strategic Development Areas	4,530
SESplan Additional Allowances	24,380

3.12 Please note all figures within Table 3.2 have been rounded to the nearest 10.

Delivery

3.13 Maintaining a supply of effective land for at least 5 years at all times, in accord with approved SDP Policy 6 and Policy 7, should ensure that there is a continuing generous supply of land for house building. Member authorities will base their calculation of the five year land supply on the period 2009 - 2024, taking into consideration housing completions. SESplan, in conjunction with member authorities, will monitor the supply of housing land on an annual basis in order to assess progress against the overall housing land requirement set out in Table 3.1. This will inform the preparation of LDPs and the second SDP.

3.14 A very significant increase in the rate of house completions across the SESplan area will be needed if the requirements set by this Supplementary Guidance are to be met. This is challenging and particularly so in 2009 - 2019 as it is expected that LDPs will be adopted around 2015, around six years into the first period (2009 - 2019).

3.15 Significant transport and strategic infrastructure improvements are essential to support the delivery of the housing land requirement set out in this Supplementary Guidance. These infrastructure requirements are set out in Figure 2 of the SDP and the accompanying Action Programme. In particular, school extensions and new schools to provide the additional pupil places required to meet development need are seen as essential and must be delivered alongside development. LDPs will provide further details on these requirements and further policy guidance in accord with Policy 9 (Infrastructure) of the approved SDP.

3.16 The Supplementary Guidance sets out a housing land requirement to meet need and demand from the South East Scotland region. Delivering that level of housing will be challenging and that will be made even more difficult should funding solutions to enable the provision of essential infrastructure improvements not be identified. A very significant increase in housing completion rates will also be required to deliver the housing needed to meet the need and demand which has been identified. Setting requirements for housing land at levels to meet the HNDA estimates of need and demand for housing units in the South East Scotland region will ensure that the supply of housing land identified in development plans will not be the reason for failing to meet this challenge.

4 Glossary

4 Glossary

Constrained Housing Land Supply	That part of the established housing land supply which may be affected by infrastructure constraints, land contamination or ownership / marketing issues.
Effective Land Supply	The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing.
Established Land Supply	The total housing land supply - including both unconstrained and constrained sites. The Established Land Supply includes the effective housing land supply.
Supplementary Guidance	Provides further information or detail in respect of policies or proposals set out in the Strategic Development Plan or Local Development Plan. Statutory guidance adopted in connection with a plan, forms part of the development plan.
Windfall	A site which becomes available for development during the plan period which was not anticipated to be available when the plan was being prepared.

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**West Lothian
Council**

COUNCIL EXECUTIVE

**PENTLAND HILLS REGIONAL PARK:
A PROPOSAL TO EXTEND THE REGIONAL PARK BOUNDARY**

REPORT BY HEAD OF PLANNING AND ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of this report is to inform the Council Executive of the recent proposal by an MSP for a Bill to extend the existing Pentland Hills Regional Park (PHRP) boundary.

B. RECOMMENDATION

It is recommended that the Executive:

1. notes the proposal for a Bill from Christine Grahame, MSP to extend the area covered by the existing Pentland Hills Regional Park designation;
2. notes that the extended area proposed would cover a greater area of West Lothian than presently covered by the regional park and extend over the whole Pentland Hills range and into South Lanarkshire and Scottish Borders;
3. notes that there is still insufficient detail to fully assess the financial impact which any extension may have and any extension of the park that requires additional financial support from West Lothian Council is unlikely to be supported;
4. notes that, notwithstanding the lack of detail available at the moment, there are, in principle; landscape, recreational and nature conservation issues that would support the extension of the regional park within West Lothian and over the whole Pentland Hills range;
5. agrees the proposed responses to the boundary extension consultation questions outlined in Appendix 2, as the Council's formal response to the consultation; and
6. notes that a further report on the extension to the park will be presented to the Environment PDSP and Council Executive if the Bill is submitted to Parliament.

C. SUMMARY OF IMPLICATIONS

I Council Values

- Focusing on our customers' needs;
- being honest, open and accountable;
- making best use of our resources; and
- working in partnership.

II Policy and Legal (including Strategic Environmental Assessment, Equality

The report accords with the adopted West Lothian Local Plan (WLLP) policies ENV 29 & 30 which confirms the council's support to Pentland

	Issues, Health or Risk Assessment)	Hills Regional Park. The proposal may require a SEA from the sponsor, but this is being clarified with the Scottish Government's SEA Gateway. There are no equality issues.
III	Implications for scheme of delegation	None.
IV	Impact on performance and performance indicators	None.
V	Relevance to Single Outcome Agreement	Outcome 8 - We make the most efficient and effective use of resources by minimising our impact on the built and natural environment.
VI	Resources - (Financial, Staffing and Property)	West Lothian Council contribution £15k per annum, index linked, towards the PHRP overall operating budget of c£340k. There is budget provision for this contribution on an on-going basis. Any extension to the park boundary will have financial implications, but these have not yet been quantified. There is no budget provision in the council's approved financial strategy for any increased contributions.
VII	Consultations at PDSP	Environment PDSP on 30 November 2013 and 27 March 2014.
VIII	Other consultations	Operational Services – NETs, Land & Countryside Services. PHRP Joint Committee on 28 March 2014

D. TERMS OF REPORT

D1 Background

West Lothian Council co-operates with City of Edinburgh and Midlothian Councils in the management of the Pentland Hills Regional Park (PHRP). The area of the park in West Lothian is only around 10% of the designated area.

The PHRP Ranger Services is managed by the lead authority, City of Edinburgh Council. The regional park was established in 1986 and initially managed by the former Lothian Regional Council, with structural funding from the former Countryside Commission for Scotland.

The aims of the Pentland Hills Regional Park as set out in its designation order are:

- to retain the essential character of the hills as a place for the peaceful enjoyment of the countryside;
- caring for the hills so that the landscape and the habitat is protected and enhanced;

- within this caring framework to encourage responsible public enjoyment of the hills; and
- co-ordination of these aims so that they co-exist with farming and other land uses within the Pentland Hills Regional Park.

To sustain the management of the park, following local government reorganisation, a Minute of Agreement was entered into by the three local authorities in 1997. However, in 2004, this agreement was amended to enable the City of Edinburgh Council (CEC) to become the lead authority through its management of a single ranger service previously shared with Midlothian Council. The recently re-organised CEC Natural Heritage Services has 14 staff covering the PHRP and other Edinburgh parks.

The Regional Park management is overseen by a Joint Committee made up of elected members from City of Edinburgh, Midlothian and West Lothian councils. West Lothian's current representative is Cllr Toner.

The Joint Committee recently agreed to rationalise its meetings from four to two a year and realign the Consultative Forum meeting, (that involves Park users groups, landowners and other interested organizations), to occur before the Joint Committee. Elected members are now invited to the Consultative Forum to hear issues, before formally considering them at the Joint Committee and it was to the most recent forum, in February 2014, that Christine Grahame, MSP set out her extension proposal.

D2 Current funding arrangements

There have been significant changes in external funding for the Regional Park, including the withdrawal of Scottish Natural Heritage funding in 2006/7 and the potential withdrawal of Midlothian Council funding 2009, but this latter proposal ultimately did not occur.

The current funding arrangements are:

	£
The City of Edinburgh Council	256,389
Midlothian Council	58,102
West Lothian Council	15,140
Scottish Water	<u>10,000</u>
Total	£339,631

D3 Proposed extension to Regional Park boundary

At a Regional Park Consultative Forum in September 2013, Christine Grahame MSP initially raised the idea of increasing the geographical area of the park to cover the whole Pentland Hills range as was originally proposed in the early 1980's.

This envisages the regional park extending further into West Lothian and South Lanarkshire, towards the A70 near Carnwath and the Borders to the A702 (see Appendix 1 for map of proposed boundary location). There are 2 options for the south boundary: using either the Garvald – Dunsyre C-road, or including Black Mount and use the A702 Dolphinton / A721 Carnwath road as the southern boundary. The proposal also includes an extension of the boundary on either side of Balerno within the CEC area.

In the early 1980's, meetings with landowners and land managers in the southern part of the Hills led to the proposal being dropped as they did not anticipate at that time any benefits from regional park designation. This may well remain the situation. Since local government reorganisation in 1996, there has been no locus for any of the three participating councils to consider the idea of extending the regional park boundary, especially due to recently constrained public sector budgets.

Recently, at the PHRP Consultative Forum on 28 February, Christine Grahame, MSP launched a proposal for a Bill to extend the boundary of the Pentland Hills Regional Park. The consultation is for 12 weeks and ends on 23 May 2014. Dependant on the responses received, the MSP indicates she will either drop the proposed bill, or continue with a Private Members Bill to the Scottish Parliament.

The MSP recognises that councils would be unable to support extension financially and that new ways of directing funding to the regional park would need to be found. She also lodged a paper listing 11 potential funding sources, some of which, for example, a charitable trust would be able to access, rather than local authorities. However, these are mostly capital project related grant funds and would not cover revenue / operating costs.

D4 Pentland Hills Regional Park Joint Committee

The Joint Committee recently met at the end of March 2014 and considered the proposal. They agreed to request the three member councils of the managing committee to respond to the consultation individually and also request that either the Scottish Government and / or Scottish Natural Heritage carry out a strategic feasibility study on the potential operational costs and issues for an extended regional park.

D5 Existing characteristics of proposed Regional Park extension area

The area south west from Harperrig and West Cairns, currently outwith the Regional Park, and which covers the Crosswood Reservoir area, is designated as an Area of Great Landscape Value (AGLV) in the West Lothian Local Plan (2009 – Policy ENV 19). The proposed park extension covers 22km² and about half a dozen properties around Colzium / Mid-Crosswood up to the administrative boundary with South Lanarkshire. In addition, there are several Forestry Commission Scotland plantations.

The Crosswood Reservoir was formally owned by Scottish Water, but the fishery there may have gone out of business. There is a right of way that leads south-west from Crosswoodburn, via Henshaw Hill on the administrative boundary, to Garvald in the Borders.

In the southern corner of the proposed extension is Craigengar Moss. This is a Special Area of Conservation (SAC), one of only two such top tier nature designations in West Lothian. It is also a Site of Scientific Interest (SSSI) designated for its rare moss species and habitat.

D6 Issues for West Lothian

There are 8 questions attached to the consultation. Proposed responses from West Lothian Council are outlined in Appendix 2. There are 3 main issues for West Lothian:

1) Financial

As stated in both reports to previous Environment PDSPs in November 2013 and March 2014, there would need to be a strong business case for extending the regional park area, as there would undoubtedly be additional staff, management and facility costs associated with doing so.

The business case would be particularly important as, in the recent past, the park budget has been under threat through funding organisations, such as Scottish Natural Heritage (SNH), withdrawing support and local authority funders also indicating that funding could be under pressure given wider efficiency requirements.

As neither of the current three councils involved in the regional park have any locus in South Lanarkshire or Scottish Borders, it is suggested that Scottish Government and / or SNH undertake a strategic feasibility study on the potential operational costs and issues for an extended regional park.

The West Lothian Countryside Manager within Operational Service is of the view that the current level of service provision via the rangers from City of Edinburgh Natural Heritage Service is value for money in relation to West Lothian's current modest financial contribution. Operational Services, within their current budget, would not be able to provide any additional West Lothian ranger staff to an extended regional park.

2) Elected Representation

Moving to a Trust model may allow some of the financial pressures to be addressed, but would weaken local authority involvement in running the park. The proposed extended Regional Park boundary would remain within the current Ward 5: East Livingston & East Calder.

As a minimum, the council would probably wish an elected member from the ward, as occurs with the existing Joint Committee management arrangements, becoming a member of any Trust should it be formed.

3) Landscape protection

Positively, an extension of the park would provide stronger planning policy support in relation to considering planning applications such as wind turbines in the extended park area. The proposed extension covers the area in West Lothian which has recently been the focus of wind farm interest e.g.; Fauch Hill.

This area is the subject of an application to Scottish Government, under the Electricity Act for 32 wind turbines and associated access works. The council objected to this application and it was the subject of a co-joined Public Inquiry in July 2013. The Reporter's recommendations are due in spring / summer 2014. Any proposed extension of the regional park would, however, be too late to be a factor in these decisions.

Finally, the council signed a concordat with the Central Scotland Green Network (CSGN) Partnership Board in early 2013. One of the main components of the CSGN is to support green space improvements and it is about to be funded by Scottish Government, following a review of its governance, as part of the National Planning Framework's major objectives. An extended regional park may attract future financial resources from the CSGN that would not otherwise be available.

E. CONCLUSION

West Lothian land managers and residents, within the park area, benefit from the involvement on the PHRP Rangers Service in a wide range of management, recreational and ecological issues. The Pentland Hills remain an important visual backdrop and open landscape for the whole district.

While there is a continued need for visitor and land management services in the Pentland Hills to respond to the evolving pressures and opportunities presented, services need to be delivered efficiently at a time of challenging economic constraints and the recently proposed extension of the geographical area covered by the park allows for further debate on the future and long term funding of the Regional Park.

While, it is officers view that West Lothian Council should, in principle, embrace the proposed Regional Park extension for landscape protection and recreational and habitat protection reasons, there remain concerns about future funding and representation.

However, organisational support from West Lothian Council would only be forthcoming if there was a sound business case for any additional management resources required, as they are not currently available from the Council and also arrangements for local authority representation on any potential future charitable trust formed to manage the park, are safeguarded.

F. BACKGROUND REFERENCES

Consultation by Christine Grahame MSP on “*A proposal for a Bill to extend the boundary of the Pentland Hills Regional Park*”, is available on-line at:

<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/12419.aspx>

Appendices/Attachments - two:

- 1) map of proposed extension to the Pentland Hills Regional Park; and
- 2) Questions from “a proposal for a Bill to extend the boundary of the Pentland Hills Regional Park” (see below).

Contact Person: Chris Alcorn, Principal Planner, Development Planning: 01506-282428.

Email: chris.alcorn@westlothian.gov.uk

Craig McCorriston

Head of Planning and Economic Development

15 April 2014

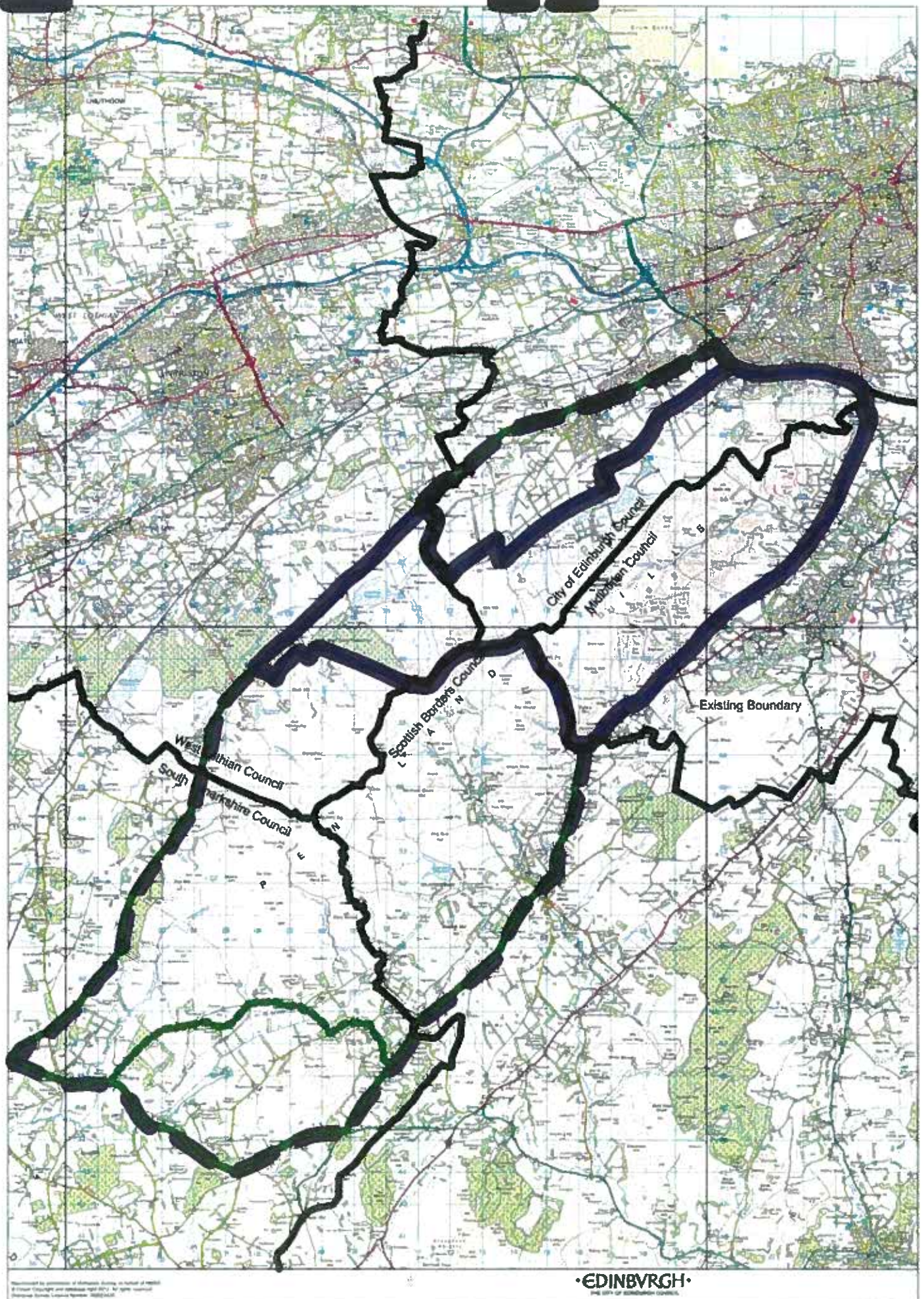
**Appendix 2: Questions from -
“a proposal for a Bill to extend the boundary of the Pentland Hills Regional Park”.**

	<i>Proposed West Lothian Council response</i>
<p>1. Do you support the aim of the proposed Bill to extend the boundary to include the entire Pentland Hills range?</p> <p>Please indicate “yes/no/undecided” and explain the reasons for your response.</p>	<p><i>In part. The merits of extending the park are supported but, any extension would have to be delivered at no additional cost - in revenue and staff time - at the time of introducing the extension and in the future. West Lothian Council could not support the extension in advance of having clarity on:</i></p> <p><i>a) future funding arrangements; and</i> <i>b) local authority representation on any future charitable trust established to run the regional park.</i></p>
<p>2. Where should the southern most boundary be located? Please explain the reasons for your response.</p>	<p><i>No strong view. This is a matter for South Lanarkshire Council and Scottish Borders Council and their respective communities to consider.</i></p>
<p>3. Should the western boundary be expanded to include the area around Balerno? Please explain the reasons for your answer.</p>	<p><i>No strong view. This is a matter for City of Edinburgh Council and their respective communities to consider.</i></p>
<p>4. Do you agree that legislation is a necessary and appropriate means of addressing the issues identified?</p>	<p><i>Yes, subject to the caveats set out in West Lothian Council's response and covering report.</i></p>
<p>5. What (if any) would be the main practical advantages of the legislation proposed? What (if any) would be the disadvantages?</p>	<p><i>Advantages:</i></p> <ul style="list-style-type: none"> <i>• stronger planning policy landscape protection to this wild open hill area;</i> <i>• enhanced nature conservation protection of Craigengar SAC / SSSI; and</i> <i>• scope for attracting additional funding, currently unavailable to this remote corner of West Lothian.</i> <p><i>Disadvantages:</i></p> <ul style="list-style-type: none"> <i>• Potential additional funding requirements placed on West Lothian Council that are not currently part of the council's approved financial strategy.</i>
<p>6. What is your assessment of the likely financial/resource implications (if any) of the proposed Bill to you or your organisation? What (if any) other significant financial implications are likely to arise?</p>	<p><i>West Lothian Council is concerned that additional grant funding will be sought to manage an extended regional park area. Should the Bill be progressed, additional financial provision should be made available to the councils by the Scottish Government to cover this proposal, or it be demonstrated by central government that a charitable trust model would have a sound financial footing to manage the extended PHRP which they propose.</i></p>

	<p><i>In addition, the existing WLC Countryside Services section, as a result of other priorities, could not undertake additional ranger activities in the extended park area in West Lothian.</i></p> <p><i>A business case should be prepared to cover the additional management & staff issues that will need funded by a proposed park extension.</i></p> <p><i>As West Lothian Council have any locus in South Lanarkshire or Scottish Borders, it is therefore requested that Scottish Government and / or SNH undertake a strategic feasibility study on the potential operational costs and issues for an extended regional park.</i></p>
7. Is the proposed Bill likely to have any substantial positive or negative implications for equality? If it is likely to have a substantial negative implication, how might this be minimised or avoided?	<i>No negative implications for equality envisaged.</i>
8. Do you have any other comments on or suggestions relevant to the proposal?	<i>None.</i>

Appendix 1

Blue line shows existing Pentland Hills Regional Park boundary. Green line shows options for extension. (October 2013)





West Lothian
Council

COUNCIL EXECUTIVE

PEST CONTROL – SERVICE REVIEW

REPORT BY HEAD OF PLANNING AND ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of this report is to make the Council Executive aware of a desire to widen the range of treatments offered by the pest control service, in order to provide a more comprehensive service as requested by customers.

B. RECOMMENDATION

It is recommended that the Council Executive notes the content of the report and approves the proposed expansion of Pest Control treatments offered.

C. SUMMARY OF IMPLICATIONS

I	Council Values	Being honest, open and accountable; working in partnership.
II	Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	<p>The proposal does not require a Strategic Environmental Assessment and does not raise any equality health or risk assessment issues.</p> <p>Specific health & safety risk assessments are in place for pest control activities.</p>
III	Implications for Scheme of Delegations to Officers	None.
IV	Impact on performance and performance Indicators	None
V	Relevance to Single Outcome Agreement	SOA 8. We make the most efficient and effective use of resources.
VI	Resources - (Financial, Staffing and Property)	No perceived change.
VII	Consideration at PDSP	The report was considered at the Environment PDSP on 27 March 2014 with the recommendation that it be forwarded to the Council Executive for approval.
VIII	Other consultations	Legal Services; Finance.

D. TERMS OF REPORT

The pest control service currently offers treatment and proofing advice for insects of public health significance plus vermin (rats and mice); it does not currently offer treatment for a wider range of mammals such as moles, squirrels or rabbits. Demand for such treatments are infrequent, however when made, customers are disappointed that services are not available. It is proposed that the service react to these comments and provide services for this un-met demand at the same charge as agreed for treatment of other vermin.

The purpose of this report is to seek permission for the Environmental Health & Trading Standards Manager to respond to consumer demand and widen the range of treatments offered to the public and trade as appropriate within existing resources.

E. CONCLUSION

A review of customer comments has identified that there is a demand to update the range of pests which are currently treated. The report seeks permission for the Environmental Health & Trading Standards Manager to increase the scope of service delivered to meet customer demand and to ensure full utilisation of available resources. Due to the low volume of such requests it is anticipated that this will be deliverable within existing resources.

F. BACKGROUND REFERENCES

Environment PDSP 27 March 2014 – Pest Control Service Review.

Appendices/Attachments: None

Contact Person: Andrew Blake, Environmental Health & Trading Standards Manager, 01506 282381, Andrew.blake@westlothian.gov.uk

Craig McCorriston

Head of Planning and Economic Development

Date of meeting: 15 April 2014



West Lothian
Council

COUNCIL EXECUTIVE

**PROPOSED RESPONSE TO THE SCOTTISH GOVERNMENT CONSULTATION ON THE
SCOTTISH REGULATORS' STRATEGIC CODE OF PRACTICE**

REPORT BY HEAD OF PLANNING AND ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of the report is to advise the Council Executive of a consultation on the Scottish Regulators' Strategic Code of Practice and to agree a response to the consultation.

B. RECOMMENDATION

It is recommended that the Council Executive:

1. notes the detail of the consultation:
2. approves this report and appendices as the council's response to the consultation for submission to the Scottish Government within the response timescale of 28 April.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; being honest, open and accountable; making best use of our resources; working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Many services have a regulatory role within the council. Each service will require to ensure that their enforcement policies apply the principles contained in the code once enacted.
III Implications for Scheme of Delegations to Officers	None
IV Impact on performance and performance Indicators	None.
V Relevance to Single Outcome Agreement	SOA 3 - Our economy is diverse and dynamic, and West Lothian is an attractive place for doing business.
VI Resources - (Financial, Staffing and Property)	None.

VII Consideration at PDSP

The report was considered at the Environment PDSP on 27 March 2014 with the recommendation that it be forwarded to the Council Executive for approval.

VIII Other consultations

Legal Services.

D. TERMS OF REPORT

D1 Background

The Scottish Government is determined to promote in all Scottish regulators a broad and deep alignment with the Government's purpose of promoting sustainable economic growth. This means building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too.

However, economic growth that exceeds the limits of our environment or damages social and community cohesion is not sustainable. Laws and regulations play an essential role in fostering a prosperous, fair and safe society. They provide essential rights and protections for citizens, consumers, workers, businesses, communities and the environment, can stimulate innovation and modernisation and support economic development. Often, achievement of regulatory outcomes delivers multiple benefits – for communities, the environment and the economy.

Section 5 of the Regulatory Reform (Scotland) Bill gives Scottish Ministers the power to issue a Code of Practice in support of the duty on regulators to contribute to sustainable economic growth. There are four main themes within the Code: regulators as enablers; risk and enforcement; understanding who you regulate; and clear and effective communication. Introduction of the code will take effect at the same time as the enactment of the Bill, it will apply to all regulators listed in schedule 1 of the Regulatory Reform (Scotland) Bill in respect of their regulatory functions as defined in the Bill – this covers all council functions with the exception of the role as a Planning Authority. A set of questions in relation to the code were asked, these, plus proposed responses, are included as appendix A.

Regulatory functions include advice, guidance, licensing, permissions and consent, inspections, monitoring and enforcement. It is predicated on existing good practice and supports the outcome-based approach which is integral to the Government's National Performance Framework. The Code also promotes an approach whereby regulators seek to understand those they regulate, including taking into account economic and business factors appropriately (for example, in terms of costs, processes and timescales). However, the latter does not mean that the interests of an individual business should over-ride the economic, social and environmental wellbeing of communities.

The duty on a regulator, under section 5(4) of the Act, to "have regard to" the Code means that the regulator **must** take into account the Code's provisions and give them due weight in developing their policies or principles or in setting standards or giving guidance. The health of Scotland's communities and environment contribute to and are interlinked with the achievement of sustainable economic growth.

The Scottish Government is committed to making sure this Strategic Code is implemented fully and is effective. A broad review of the effectiveness and progress with embedding the Code will be commissioned 18 months after it comes into effect.

D2 Requirements for regulators contained within the code

The code places a number of duties upon regulators – the list is extensive however it is anticipated that most regulators within the council already apply these principles therefore only minor changes to policy documents are likely to be required. In particular the code requires that regulators:

- Adopt a positive enabling approach in pursuing outcomes that contribute to sustainable economic growth.
- Be alive to other interests, including e.g. relevant community and business interests and take business factors appropriately and proportionately into account in their decision making processes.
- Adopt risk and evidence based protocols which help target action where it's needed and help ensure the achievement of measurable outcomes.
- Develop effective relationships with those they regulate and have clear two-way communication in place.
- Tailor their approach depending on the nature of the sector they are regulating and the desired outcomes. This includes a commitment to advice and support for those who seek to comply, allied with robust and effective enforcement when justified.
- Recognise, in their policies and practice, a commitment to the five principles of better regulation: regulation should be transparent, accountable, consistent, proportionate and targeted only where needed.
- Pursue continuous improvement in regulatory practice based on the principles of better regulation.
- Carry out their activities in a way that helps businesses and regulated bodies to comply and also grow sustainably.
- Deliver an efficient, effective and timely service and minimise business compliance costs, where possible, by reducing unnecessary bureaucracy and delays.
- Help those they regulate to design simple and cost-effective compliance solutions to improve confidence and day to day management control.
- Work collaboratively with other regulators and/or those they regulate to anticipate, understand and address, compliance challenges associated with strategic innovations or growth plans.
- Consider the impact of their regulatory approach on those they regulate and any other relevant stakeholders. This should include stakeholder consultation on major changes to operational policy to ensure that the impact of the changes is properly explored with those affected.
- Publish clear risk assessment methodologies and risk ratings and review these regularly, evaluating the effectiveness of their chosen approaches.
- Have mechanisms to work collaboratively to assist businesses and other bodies regulated by more than one regulator.

- Review existing core operational policies e.g. enforcement policy, customer service charter etc. and ensure alignment with the Code, taking account of the Code in developing new operational policies and build the Code into relevant staff training/awareness-raising.
- Ensure that the Code and core operational policies are available to regulated operators/persons in order that they know what to expect and have in place mechanisms for gaining customer feedback on service delivery and alignment with the Code.

The proposed response was presented to the Environment PDSP on 27 March. It was agreed to progress the response to the Council Executive with one suggestion, that on question 6 of the response, consideration be given to including an example of good practice. An example relating to the publicly available EH&TS enforcement policy has now been included.

D3 Additional comments proposed following the COSLA event

After the draft response was considered at the above Environment PDSP meeting, COSLA in conjunction with the Scottish Government hosted an event on 1 April 2014 for regulators to discuss the consultation. Following discussions which took place at that event it is suggested that a change is made to the draft response to outline potential difficulties with the operation of the code from a licensing perspective.

The additional comments to be included at the answer to question 7 are as detailed in Appendix 2.

E. CONCLUSION

The code is designed to ensure implementation of good practice in regulatory functions whilst promoting economic growth. It aligns with West Lothian Council's aims of promoting the economy and will impact for all regulatory functions within the council with the exception of the functions as a Planning Authority. The proposed response to the consultation therefore welcomes the production of the code.

F. BACKGROUND REFERENCES

Environment PDSP 27 March 2014 – Proposed response to the Scottish Government consultation on the Scottish Regulator Strategic Code of Practice.

Appendices/Attachments:

1. Proposed consultation response considered at Environment PDSP on 27 March 2014.
2. Proposed additional consultation response to Q7

Contact Person: Andrew Blake, Environmental Health and Trading Standards Manager, Tel. 01506 282381, email Andrew.blake@westlothian.gov.uk

Craig McCorriston,

Head of Planning & Economic Development.

Date: 15 April 2014.

Appendix 1.

CONSULTATION QUESTIONS

To ensure we have a code which meets the requirements of regulators and the regulated, we are seeking views on the content of the Code with the following questions.

Question 1 – Does the Code clearly set out its purpose and policy intent?

Yes

Please explain your view – n/a

Question 2 – Does the Code clearly explain how regulators can support compliance and contribute to achieving sustainable economic growth?

No

Please explain your view.

The code suggests a strategic aim of assisting economic growth but does not explain how this would happen in practice across the wide range of regulation covered. Each regulator will require to interpret the code and apply it to their particular discipline.

Question 3 – Does the Code clearly set out the requirements to enable regulators to work in way that is transparent, accountable, proportionate, consistent and targeted only at cases where action is needed?

Yes

Please explain your view

Question 4 – Should the Code more explicitly recognise the contribution that sustainable economic growth brings to local communities through the employment, investment and spend associated with specific business developments (see paragraph 3)?

No

Please explain your answer. Further explanation of economic growth is not required.

Question 5 – Are there any essential requirements which should be included in the Code and are currently absent?

Yes

If yes, please provide details.

The final code should have wording to ensure that it cannot be used as a document/defence to avoid accountability of business in complying with public protection legislation.

Question 6 – Do you have additional case study examples of good practice which you would like to be included?

Yes

If yes, please provide details of your case study.

A current example of ensuring transparency, accountability, and proportionate enforcement is the use of the publicly available West Lothian Council Environmental Health & Trading Standards Enforcement Policy which is approved by the council. It explains to businesses

the rationale of when particular enforcement actions will be taken and demonstrates an escalating approach in line with the risk to health and severity of offence.

Question 7 – Do you think there would be difficulties in implementing and complying with the Code?

Yes

Please explain your view

The strategy of a proportionate enforcement regime in relation to bureaucratic requirements may be contrary to other enforcement guidance requiring detailed paperwork – e.g. requirements by the Food Standards Agency for specific business sectors to have written procedures even although they may be operating effectively.

There may also be difficulty and inconsistency in deciding which areas of regulation are outweighed by economic considerations.

The code promotes delivering advice and guidance to assist economic growth – many regulators have already removed advice services as part of a budget strategy which focussed on statutory requirements rather than optional advice.

Question 8 – Do you agree with the proposed review process and timescales (as set out in Annex A)?

Yes

Please explain your view n/a

Question 9 – Should the Code contain more specific monitoring and reporting requirements for regulators?

No

Please explain your view

The draft code lists the requirements for regulators, any monitoring should be against the requirements listed.

Question 10 – Do you have any other comments on the draft Code?

No

Please explain your view n/a

Appendix 2

PROPOSED ADDITIONAL CONSULTATION RESPONSE TO Q7

The code suggests at paragraph 12 that regulators must

“Tailor their approach depending on the nature of the sector they are regulating and the desired outcomes. This includes a commitment to advice and support for those who seek to comply, allied with robust and effective enforcement when justified.”

From a licensing perspective this will be impossible to comply with since local authorities are responsible only for administering and undertaking compliance with the various licensing schemes they are responsible for. Although local authorities provide general guidance on these licensing schemes they cannot provide advice on licensing law to applicants and they must seek their own legal advice. In addition, the responsibility for enforcement of the majority of the licensing schemes operated by local authorities rests with Police Scotland and so a local authority has no control over the quality of enforcement.

For the reasons given above local authorities would not be able to comply with the requirements of paragraph 16, namely -

“Regulators must:

- *Publish clear risk assessment methodologies and risk ratings and review these regularly.*
- *Evaluate the effectiveness of their chosen approaches.*

This should include the option to discuss and receive advice about decisions taken.”



**West Lothian
Council**

COUNCIL EXECUTIVE

AUTHORISATION OF ENFORCEMENT STAFF – ENVIRONMENTAL HEALTH & TRADING STANDARDS

REPORT BY HEAD OF PLANNING AND ECONOMIC DEVELOPMENT

A. PURPOSE OF REPORT

The purpose of the report is to seek the Council Executive approval to amend the Scheme of Delegation to Officers to permit the Head of Planning and Economic Development, and through delegation the Environmental Health & Trading Standards Manager, to authorise both council staff, and in certain limited circumstances non-council employees, to carry out activities under relevant legislation to protect West Lothian residents and businesses.

B. RECOMMENDATION

It is recommended that the Council Executive approves the proposed additions to the Scheme of Delegations to Officers as per the details set out in this report.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs; being honest, open and accountable; making best use of our resources; working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	The Local Government Scotland Act 1973, allows local authorities to appoint officers and to delegate their functions to another local authority or officers of that authority.
III Implications for Scheme of Delegations to Officers	If approved the terms of this report would be incorporated within the Scheme of Delegation.
IV Impact on performance and performance Indicators	None.
V Relevance to Single Outcome Agreement	SOA 4: We live in resilient, cohesive and safe communities. SOA 7: We live longer, healthier lives and have reduced health inequalities.
VI Resources - (Financial, Staffing and Property)	None.

VII Consideration at PDSP

The report was considered at the Environment PDSP on 27 March and it was recommended that it be forwarded to the Council Executive for approval.

VIII Other consultations

Legal Services.

D. TERMS OF REPORT

D1 Background

Environmental Health & Trading Standards engage with cross-boundary enforcement units such as the Scottish Scambusters team and the Scottish Illegal Money Lending Unit to deliver specialist protection activities within West Lothian. These cross-boundary agencies are currently employed by other local authorities such as Glasgow City Council and Dundee City Council, however may at some point transfer to Trading Standards Scotland which is not a local authority. Legislation allows councils to appoint officers to carry out their statutory functions, and those individuals appointed do not have to be employees of the council concerned. Furthermore, specific legislation exists, for example the Animal Boarding Establishment Act 1963, which gives the local authority powers to authorise any officer or veterinary surgeon to inspect boarding establishments – again, those authorised may not be employees of the authorising authority. These examples demonstrate the need for a flexible, yet accountable, approach to the authorisation of individuals to protect our communities and ensure compliance with legislation.

The existing Scheme of Delegation to Officers does not currently permit the Head of Planning & Economic Development, or the Environmental Health & Trading Standards Manager, to authorise such non-WLC employees, meaning that the authority to deliver the protection desired may be open to question should legal proceedings be required.

The purpose of this report is to ensure that such protection is afforded and to prevent any legal/administrative challenge to individuals working to protect West Lothian residents and businesses.

D2 Proposed Changes to Scheme of Delegation

The current scheme of delegation was last updated on 31 October 2013. Section 12.7 (2) identifies the particulars of the delegation applicable to the Head of Planning & Economic Development in relation to the Environmental Health & Trading Standards, and Section 12.8 identifies those applicable to the Environmental Health & Trading Standards Manager.

Within this delegation, the Environmental Health & Trading Standards Manager is identified as the *“Competent person for the purposes of exercising the council’s functions relating to protection of public health, and designating suitably qualified officers of the council as additional such competent persons (Public Health (Scotland) Act 2008, section 5).”*

It is proposed that the Section 12.8 be amended to read – the *“Competent person for the purposes of exercising the council’s functions relating to the application of Environmental Health and Trading Standards enforced legislation aimed at protecting the public and businesses within West Lothian, designating and authorising suitably qualified individuals to assist in this function as required. In addition, to specifically identify competent persons under the Public Health (Scotland) Act 2008, section 5.*

E. CONCLUSION

The current Scheme of Delegation to Officers does not permit the Head of Planning & Economic Development or the Environmental Health & Trading Standards Manager to authorise non-council employees to enforce legislation within West Lothian. The proposed changes will facilitate this, allowing cross-boundary enforcement teams, and others, to work in partnership with our own staff thereby protecting our communities and local businesses.

F. BACKGROUND REFERENCES

Environment PDSD, 27 March 2014 – Authorisation of Enforcement Staff – Environmental Health & Trading Standards.

Council Executive, 2 December 2013, Authorisation of the Scottish Illegal Money Lending Unit

Environment PDSP 12 March 2009 – Scottish Scambuster Team report.

Community Safety Committee 24 August 2004 – Department of Trade and Industry Initiative on Illegal Money Lending.

Appendices/Attachments: None.

Contact Person: Andrew Blake, Environmental Health and Trading Standards Manager, Tel. 01506 282381, email Andrew.blake@westlothian.gov.uk

Craig McCorriston,
Head of Planning & Economic Development.

Date: 15 April 2014.



West Lothian
Council

COUNCIL EXECUTIVE

WEST LOTHIAN COMMUNITY HEALTH AND CARE PARTNERSHIP BOARD

REPORT BY DEPUTE CHIEF EXECUTIVE, COMMUNITY HEALTH AND CARE PARTNERSHIP

A. PURPOSE OF REPORT

To update members on the business and activities of West Lothian Community Health and Care Partnership (CHCP) Board.

B. RECOMMENDATION

To note the terms of the minutes of meeting of West Lothian CHCP Board on 28 January 2014 in the Appendix to this report.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs
	Being honest, open and accountable
	Working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Council requires the activities of certain outside bodies to be reported to elected members on a regular basis, as part of its Code of Corporate Governance.
III Implications for Scheme of Delegations to Officers	None.
IV Impact on performance and performance Indicators	None.
V Relevance to Single Outcome Agreement	None.
VI Resources - (Financial, Staffing and Property)	None.
VII Consideration at PDSP	None.
VIII Other consultations	None required.

D. TERMS OF REPORT

On 29 June 2010 the Council Executive decided that the activities of certain outside bodies should be reported within the council to ensure all elected members are aware of the business of those bodies and to help to ensure their activities are more effectively scrutinised.

In accordance with that decision the business of West Lothian CHCP Board was to be reported to this meeting by the production of its minutes. The relevant documents are produced as appendices to this report.

E. CONCLUSION

This report ensures that members are kept apprised of the activities of West Lothian CHCP Board as part of the council's Code of Corporate Governance.

F. BACKGROUND REFERENCES

West Lothian Council Code of Corporate Governance.

Council Executive, 29 June 2010

Appendices/Attachments: 1

1 Minute of meeting of West Lothian CHCP Board held on 28 January 2014

Contact Person: Jim Forrest, Depute Chief Executive, CHCP

01506 281977

Jim.Forrest@westlothian.gov.uk

Date: 15/4/14

MINUTE of MEETING of the WEST LOTHIAN COMMUNITY HEALTH AND CARE PARTNERSHIP BOARD of WEST LOTHIAN COUNCIL held within STRATHBROCK PARTNERSHIP CENTRE, 189 (A) WEST MAIN STREET, BROXBURN EH52 5LH, on 28 JANUARY 2014.

Present – Frank Toner (Chair), Jane Houston, John McGinty, Andgela Moohan (substituting for Anne McMillan), Ed Russell-Smith

Apologies – Janet Campbell, Brian Houston, Anne McMillan, Alison Mitchell

In Attendance – Jim Forrest (CHCP Director) Jennifer Scott (Head of Council Services), Marion Christie (Head of Health Services), Carol Mitchell (Assistant Director of Finance, NHS Lothian), Alan Bell (Senior Manager Communities and Information – West Lothian Council), Sharon Leitch (Auditor West Lothian Council) Carol Bebbington (Primary Care Manager – NHS Lothian), Robert Naysmith Clinical Director, Public Dental Service), John Richardson (PPF)

Apologies – Gill Cottrell (Chief Nurse – NHS Lothian)

1. DECLARATIONS OF INTEREST

Councillor Frank Toner declared a non-financial interest as he was the council's appointment to the Board of NHS Lothian as Non-Executive Director.

2. MINUTE

The Board approved the minute of its meeting held on 26 November as a correct record.

3. CHCP RUNNING ACTION NOTE

The Board considered the Running Action Note (which had been circulated).

Decision

To note and agree the Running Action Note.

4. NOTE MINUTE OF MEETING OF THE PRIMARY CARE JOINT MANAGEMENT GROUP

The Board noted the minute of the Primary Care Joint Management Group meeting on 14 November 2013.

5. NOTE MINUTE OF MEETING OF THE PRIMARY CARE JOINT MANAGEMENT GROUP

The Board noted the minute of the Primary Care Joint Management Group meeting on 12 December 2013.

6. NOTE MINUTE OF MEETING OF THE PRIMARY CARE FORWARD GROUP

The Board noted the minute of the Primary Care Joint Management Group meeting on 6 June 2013.

7. NATIONAL DENTAL INSPECTION PROGRAMME FOR SCOTLAND 2013 PRIMARY 7 -

The Board considered a report and presentation (copies of which had been circulated) by the Clinical Director – Public Dental Service providing details of the recently published national report into the dental health of Primary 7 Children in Scotland, which showed that the proportion of P7 children in Lothian with no obvious tooth decay had increased from 72% in 2011 to 77% in 2013. Appendix 1 to the report contained details of the National Dental Inspection Programme 2013.

The report advised that detailed dental inspections of children were carried out in state schools across Scotland annually, alternating between children in primary 1 and primary 7 classes. In Lothian 9.5% of Primary 7 children were in private education and these children did not receive a dental inspection.

Information gathered from inspections was used to:-

- Monitor dental health of school children over time.
- Inform parents of their child's dental health status and promote regular attendance at the dentist.
- Inform local Health and Education authorities of the dental health of children in their area.

The report went on to advise that in previous years detailed analysis of the results across Scotland showed that children in more deprived areas had higher levels of dental disease, and the converse was true. Because 9.5% of Lothian's P7 population were in private education and were not inspected the positive effect of this sub-population on Lothian's headline figure was lost.

The report explained that a steady improvement could be seen from 2005, reflecting the benefits of both the nursery and school toothbrushing programmes. It was also advised that 98.5% (target 100%) of Lothian nurseries and 36% (Target 20%) of primary schools now participated in toothbrushing programmes.

In conclusion the report advised that a study carried out by the University

of Glasgow and published by the Scottish Government showed that for the year 2009/10 an investment of £1.8m in providing Childsmile toothbrushing programmes across Scotland avoided just over £6m of cost in providing dental treatments to children. Although this was good economic news the major benefit was that many Scottish children avoided pain, fillings, extractions and general anaesthetics for dental problems.

Decision

1. To note the contents of the report.
2. To continue to support the Childsmile Programme in schools and nurseries.
3. To note the presentation in relation to National Dental Inspection Programme for Scotland 2013 and its relevance to West Lothian
4. To provide Board members with information about the apparently low rate of Primary 7 inspections in West Lothian.

8. PUBLIC DENTAL SERVICE

The Board considered a report (copies of which had been circulated) by the Clinical Director – Public Dental Service advising that West Lothian CHCP hosted the Salaried Primary Care Dental Service which was made up of two elements; the Community Dental Service and the Salaried General Dental Practitioner Service. On 28 November 2013 a Scottish Government letter to Board Chief Executives announced the merger of the two dental services from 1 January 2014 and that this new service would be known as the Public Dental Service.

The report explained that most Boards in Scotland provided dental services to priority groups in their local population using staff working in the Community Dental Services. Community dental staff worked under CDS terms and conditions, and as well as providing dental treatment undertook the National Dental Inspection Programme.

Since 2000 the remit of Salaried General Dental Practitioners expanded so that they began to treat patients who, for a variety of reasons were unable to attend an independent GDP. For example this could be that the patient had a complex medical condition, were particularly anxious about attending a dentist or required specialist care. The salaried General Dental Practitioner Service was funded through the non cash limited GDS budget.

In Lothian these two services had always been managed as one service and had been known as the Salaried Primary Care Dental Service.

The report went on to advise that in 2006 the Chief Dental Officer commissioned a report that recommended merging the two services so that there was a consistent level of care for patients.

All dentists in the Public Dental Service would work under GDS

regulations and unless a patient was included in an exemption category, the patient would pay 80% of the cost of treatment up to a maximum of £384.

The report provided a list of non-GDS work which would incur no charges to the patient.

In conclusion the report advised that as from 1 April 2014 the non cash limited GDS budget had become cash limited and the allocation was negotiated annually with the Scottish Government.

Decision

To note the information in relation to the merger of the Community Dental Service and the Salaried General Dental Practitioner Service from 1 January 2014.

9. RISK MANAGEMENT

The Board considered a report (copies of which had been circulated) by the Community Health and Care Partnership Director providing an update on the review of the CHCP risk register. Appendix 1 to the report provided details of CHCP Risks and Risk Action Progress.

The report advised that the CHCP risk register was reviewed and updated in June 2013 and the risks were now recorded in West Lothian Council's Covalent system and the NHS Lothian's Datix system.

The purpose of the register was to provide a record of the high level risks to the CHCP which, should they occur, threaten the ability of the CHCP to achieve its objectives. The recording of the risk register ensured that management had identified and considered risks and were satisfied that they were either appropriately controlled or had planned actions in place to mitigate the risks further.

The CHCP Director explained that the risk register was reviewed by the CHCP Senior Management Team in January 2014, and that had involved a review of risks, their scores and associated risk actions. The review resulted in a number of changes which were detailed in the report.

In conclusion the report advised that the CHCP risks had been reviewed and updated to more accurately reflect the current risks to the CHCP and the actions required to further mitigate these risks. Progress in implementing risk actions were now monitored through Covalent.

Decision

1. To note and agree the updated CHCP risk register.
2. To agree that future reports should identify clearly risks which remained on the register but in relation to Action Plans had been completed with no outstanding work required to mitigate the risk.

10. SCHEDULE OF DATES FOR FUTURE CHCP BOARD MEETINGS

The Board considered a report (copies of which had been circulated) by the Community Health and Care Partnership Director outlining the proposed schedule of meetings for the Board until June 2015.

The report advised that Standing Orders for the Proceedings and Business of West Lothian Community Health and Care Partnership stipulated that "The Board shall normally meet every 6 weeks but not less than 6 times in a year, in accordance with a timetable of meetings fixed annually by the Board and amended from time to time by the Board".

The CHCP Board generally met on a six-eight weekly basis on Tuesdays in Strathbrock Partnership Centre from 2.00pm – 4.00pm. Meeting dates had been agreed until May 2014. The following dates were therefore proposed for meetings until June 2015:-

12 August 2014

7 October 2014

9 December 2014

3 February 2015

7 April 2015

2 June 2015

Decision

To agree the proposed schedule of meetings until June 2015.

11. CARE GOVERNANCE -

CROFTHEAD HOUSE NURSING HOME - REPORT BY HEAD OF SOCIAL POLICY (HEREWITH).

- a) The Board considered a report (copies of which had been circulated) by the Head of Council Services advising of the application of an enhancement in the quality element of the National Care Home Contract fee to one private provider who had been awarded a Grade 5 by the Care Commission in the category Quality of Care and Support.

The Head of Council Services explained that in April 2007 the National Care Home Contract for Older People Care Homes was implemented in West Lothian and across Scotland. The aim of the contract was to provide a consistent approach to the quality of care and the national fee for the provision of Older People Care Home beds in the private sector.

In April 2008 a report was presented to the Council Executive to seeking

agreement on the implementation of the updated contract 08/09, its quality requirements and the national increase in fee. In April 2009, April 2010 and April 2011 reports were delivered to the Social Policy PDSP advising of the quality aspects of the continuing contract and national fee increase.

The Head Council Services went on to advise that a key performance indicator in the contract 2013/2014 was the use of the quality assurance framework currently in use by The Care Inspectorate. Its officers undertook inspections of the Older People Care homes and awarded grades in relation to the Quality of Care & Support, Quality of Environment, Quality of Staffing and Quality of Management and Leadership.

It was stipulated by the contract that, as part of the contract quality agenda for Care Homes with nursing, an additional £2.00 per resident per week would be available if a QAF grade of 5 or 6 was achieved in Quality of Care and Support and a minimum of grade 3 in other categories. A further £1.00 per resident per week would be available to homes that achieved QAF grade 5 or 6 in Quality of Care and Support and a minimum of 5 in any one other category.

In October 2013, Crofthead Nursing Home was awarded QAF grade 5 in the category Quality of Care and Support, QAF grade 4 in the category Quality of Environment, QAF grade 5 in the category Quality of Management and Leadership and QAF grade 5 in the category of Quality of Staffing. Appendix 1 to the report contained the Care Service Inspection report.

The report concluded that the National Care Home Contract required West Lothian Council to apply the enhancement under the quality element of the contract. The enhancement for Crofthead Nursing Home calculated to an additional £3 per resident per week backdated to 30 October 2014.

Decision

To note the application of enhancement in the quality element of the National Care Home Contract fee to the private provider at Crofthead Nursing Home.

LIVINGSTON NURSING HOME

- b) The Board considered a report (copies of which had been circulated) by the Head of Social Policy advising of the continued suspension of admissions to Livingston Nursing Home as a result of the Improvement Notice requirements issued by the Care Inspectorate and the current status of the ongoing investigation.

The Head of Council Services explained that Livingston Nursing Home was registered to care for 58 older people. Currently there were 42 places in this nursing home with 16 vacancies. West Lothian Council had responsibility for 27 of the 42 residents. The remaining 15 residents had

been placed by and remained the responsibility of other local authorities.

In July 2013 a formal complaint was raised with the Care Inspectorate who subsequently carried out an unannounced inspection. West Lothian Council took the decision to suspend purchasing of new placements and all other local authorities were advised through the Association of Directors of Social Work (ADSW) communication channels.

A further inspection of the home in September 2013 resulted in a further downgrade to 1 in all four categories and the issue of an Improvement Notice by the Care Inspectorate.

It was advised that a multi agency working group had met regularly and at a meeting held on 12 December 2013 the Care Inspectorate advised that they had visited the home on three occasions in November and found firm evidence that improvements were being made but some elements of the Improvement Notice which should have been completed in October 2013 had been extended to January 2014.

At the multi agency meeting on 12 December 2013 Police Scotland advised that two members of staff from the Livingston Nursing Home had been charged under Section 315 of the Mental Health Care and Treatment (Scotland) Act 2004, and a further two staff remained suspended pending further police investigations.

It was explained that if the Care Inspectorate concluded that there was no organisational capacity to improve grades within a reasonable time frame, the council would need to consider alternatives.

In conclusion the report advised that the council was discharging its statutory duties under the Adult Support and Protection (Scotland) Act 2007 by fulfilling the duty to inquire. Meetings were convened under the West Lothian Adult Protection Committee's Large Scale Investigation Protocol and a further meeting to determine whether a full Large Scale Investigation was required would be held on 16 January 2014.

Decision

1. To note that the Care Inspectorate had extended the period for some parts of the Improvement Notice applicable to Livingston Nursing Home and that further visits would take place in early February.
2. To note the ongoing monitoring which was being undertaken by the multi agency working group and senior representative group which ensured the council and partner agencies were discharging their statutory duties.
3. To note that admissions to Livingston Nursing Home continued to be suspended.
4. To agree that officers should ensure that procedures for passing on nursing home inspection scores to GPs were being followed through the Primary Care Joint Management Group and to advise

the Board accordingly.

12. STAFF GOVERNANCE

The Board considered a report (copies of which had been circulated) by the Head of Council Services and the Head of Health Services providing an update on staff issues within the CHCP.

The report advised that Health and Safety was an essential element in implementation of NHS Staff Governance Standards which stipulated that staff were entitled to be:-

- Well Informed
- Appropriately trained
- Involved in decision which affect them
- Treated fairly and consistently
- Provided with an improved and safe working environment.

Currently CHCP staff worked within Health and Safety policies and procedures of their respective employer and each organisation had different approaches and structures in place to support their delivery of this statutory requirement.

The report explained that it recognised the benefits of developing a more consistent approach, guidance and support to staff particularly where they were/would be working in integrated teams. Therefore it was advised that work was at an early stage to scope out the requirements for a more integrated approach to the management of health and safety.

The report went on to advise that West Lothian CHCP underwent reassessment against the Investors in People Standard in November 2013. The assessment process was carried out in accordance with the guidelines provided by the UK Commission for Employment and Skills (UKCES) with the outcome that West Lothian CHCP continued to meet the requirements.

Recommendations made for continuous improvement were linked to key priorities and included improving feedback to staff on achievements and impact of activities, realising the potential of the new values through embedding these in practice and developing manager coaching skills to enable a more consistent leadership style.

In conclusion the report advised that the CHCP Investors In People Team would use the feedback to develop an improvement plan and would continue to liaise with the IIP Specialist to support continuous improvement.

Decision

1. To note the work being undertaken to develop a unified systematic approach to managing Health and Safety and establish an integrated governance framework.
2. To note and to congratulate staff on the Health Board's reaccreditation against the Investors In People Standard in November 2013.

13. DIRECTOR'S REPORT

The Board heard a report by the CHCP Director providing an update on key areas of work in which the partnership had been involved in since the last meeting of the Board.

Decision

To note the information and work undertaken in relation to:-

- a) The opening of a new early years and family resource for Armadale.
- b) The development of the Roots of Empathy programme.
- c) The opening of a new courtyard at Limecroft.
- d) Blackburn Partnership Centre.



West Lothian
Council

COUNCIL EXECUTIVE

ST JOHN'S HOSPITAL STAKEHOLDER GROUP

REPORT BY DEPUTE CHIEF EXECUTIVE, COMMUNITY HEALTH AND CARE PARTNERSHIP

A. PURPOSE OF REPORT

To update members on the business and activities of St John's Hospital Stakeholder Group.

B. RECOMMENDATION

To note the terms of the minutes of meetings of St John's Hospital Stakeholder Group held on 12 February 2014 in the appendix to this report.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs
	Being honest, open and accountable
	Working in partnership.
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Council requires the activities of certain outside bodies to be reported to elected members on a regular basis, as part of its Code of Corporate Governance.
III Resources - (Financial, Staffing and Property)	None.
IV Consultations	None required.

D. TERMS OF REPORT

On 29 June 2010 the Council Executive decided that the activities of certain outside bodies should be reported within the council to ensure all elected members are aware of the business of those bodies and to help to ensure their activities are more effectively scrutinised.

In accordance with that decision the business of St John's Hospital Stakeholder Group was to be reported to this meeting by the production of its minutes. The relevant documents are produced as appendices to this report.

E. CONCLUSION

This report ensures that members are kept apprised of the activities of St John's Hospital Stakeholder Group as part of the council's Code of Corporate Governance.

F. BACKGROUND REFERENCES

West Lothian Council Code of Corporate Governance.

Council Executive, 29 June 2010

Appendices/Attachments: 1

Minute of meeting of the St John's Hospital Stakeholder Group held on 12 February 2014

Contact Person: Jim Forrest, CHCP Director

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Date: 15/4/14

MINUTE of MEETING of the ST JOHN'S HOSPITAL STAKEHOLDER GROUP of WEST LOTHIAN COUNCIL held within BOARDROOM 1, ST JOHN'S HOSPITAL, on 12 FEBRUARY 2014.

Present – Councillor John McGinty (Chair), Anne McMillan and Frank Toner and Maureen Anderson (Patient Representative) and by video link from Waverly Gate, Edinburgh – John Iredale and George Walker (substituting for Alison Mitchell)

Apologies – Alison Mitchell (Non-Executive Director of NHS Lothian Board), Dr Alison McCallum and Agnes Ritchie (NHS Lothian)

In Attendance – Jim Crombie and Chris Stirling

1. DECLARATIONS OF INTEREST

Councillor Frank Toner declared a non-financial interest as a Non-Executive Director of Lothian Health Board and as Chair of the West Lothian Community Health and Care Partnership.

2. MINUTE

The Group confirmed the Minute of its meeting held on 15 January 2014 subject to the correction that Maureen Anderson (Patient Representative) had submitted her apologies to the meeting.

3. PAEDIATRIC SERVICES - VERBAL UPDATE

Jim Crombie, Director of Scheduled Care, provided the Stakeholder Group with an update in relation to the Paediatric Unit at St John's Hospital.

Mr Crombie explained that the paediatric rota for February was now confirmed and that work on the rota for March had begun. He further explained that given the fragile nature of the rota it was not possible to provide the rota any in advance than on a month-by-month basis. Work had also begun to ensure appropriate cover for the Easter holiday period, taking into consideration staff requirements for leave at this time.

Mr Crombie then provided an update in terms of the current vacancies within the Paediatric Unit. He advised that the vacancies were being advertised in the British Medical Journal including online and to date there had been a lot of interest shown including applicants from abroad. The Journal of Paediatric Nursing was also being utilised for the advertising of neo-natal nurse vacancies. Work was continuing to review the range of job vacancies with a view to creating a joint package of consultant, speciality doctors and nursing posts and it was intended that a micro-site would be developed to advertise the posts and would remain live for a period of three months.

In relation to a question asked by Councillor Toner, Mr Crombie confirmed

that whilst the vacancies existed NHS Lothian remained committed to the existing delivery of service at the unit.

George Walker, Non-Executive Director for NHS Lothian then asked if it would be possible to consider students for the vacancies. Mr Crombie advised that this had been considered but it had not been possible to take forward. Mr Crombie also advised that the adverts were not specifying the exact number of vacancies so they could attract as many as applicants as possible for the posts.

Councillor McGinty then sought guidance on activity in the unit and whether or not the activity was on the increase or decrease. Mr Crombie advised that work on this area had begun and that he would share the findings with the Stakeholder Group at the next meeting.

Mr Crombie, in response to a question from Councillor McGinty advised that the two Clinical Fellows from Myanmar were still continuing their extensive orientation of the NHS and that would be the case for the next few months. They had been recently completed their placements at St John's Hospital.

The Chair thanked Mr Crombie for the update and confirmed that the item would remain on the agenda.

Decision

1. Noted the update in terms of the Paediatric rota;
2. Note the update in terms of the existing vacancies in the unit;
3. Agreed that information relating to the unit's activity would be brought to a future meeting of the Stakeholder Group; and
4. Agreed that the item of business would remain on the agenda.

4. RESPIRATORY MEDICINE – VERBAL UPDATE

Chris Stirling, Site Director for St John's Hospital provided the Stakeholder Group with an update in relation to the staffing of the Respiratory Medicine provision at St John's Hospital.

Mr Stirling advised that the number of consultants in the unit was being expanded to four and that two appointments had already been made. Interviews for the remaining two posts had recently been completed however it had not yet been possible to confirm appointments.

Mr Stirling also advised that the job description for a nurse for the Respiratory Unit had recently been finalised. This would be an additional post for the unit.

Councillor Toner then enquired as to development of services in the Respiratory Unit once all the vacancies were filled and consultants were in place.

Mr Stirling explained that one of the consultants already appointed had an interest in diseases such as Tuberculosis and would be exploring the treatments for this condition and those that were similar. Also explorations could get under way in terms of OPAT (Outpatient Parenteral Antibiotic Therapy), EBUS (Endobronchial Ultrasound) and Thoracoscopy. Further details to service provision would be provided to the Stakeholder Group in due course as part of the overview of the Respiratory Unit Strategy that was programmed for a future meeting.

It was noted that a number of treatments were being offered as outpatient appointments, instead of remaining in hospital, and Maureen Anderson (Patient Representative) enquired as to what provision the hospital had made for those patients who would struggle to attend as an outpatient on such a regular or routine basis.

Mr Stirling explained that to date most patients were happy to attend as an outpatient instead of having to remain in hospital overnight and that NHS Lothian did have a Transport Policy in place to assist in those cases where patients struggled to attend on a regular basis. The Stakeholder Group were also advised that any unnecessary stay in hospital for patients also brought about other risks that may not necessarily be associated with their original diagnosis. Mr Crombie undertook to provide to the Stakeholder Group details of those provisions in place to assist patients having to attend as an outpatient on a regular basis.

Councillor Toner enquired as to whether it would be possible for some outpatients to be treated in the home instead.

Mr Stirling explained that the treatment of patients in their own homes would very much depend on the individual's needs and again he advised that most patients were happy to attend on an outpatient basis and that patients would generally not be encouraged to elect to stay overnight when it was not essential or necessary.

The Chair thanked Mr Stirling for the update and confirmed that the item would remain on the agenda.

Decision

1. Noted the update with regards to the remaining two vacancies in the Respiratory Unit;
2. Noted that the job description for the nurse for the Respiratory Unit had been finalised;
3. Noted that further details of the overall strategy for the Respiratory Unit would be provided to a future meeting of the Stakeholder Group; and
4. Agreed that the Director of Scheduled Care would provide details, prior to the next meeting of the Stakeholder Group, of the process followed by NHS Lothian, to assist those attending outpatient appointments, with transport arrangements.

5. WORK PLAN

The Stakeholder Group considered the Work Plan (copies of which had been circulated) and which contained new items of business and recurring items of business.

It was noted that the Laboratory Services had been scheduled to present to the Stakeholder Group at the February meeting but this had not been possible due to staff leave. Also as there was already a presentation on the Strategic Plan to the March meeting it was agreed that the Laboratory Services presentation be moved onto the April meeting instead.

The Chair then took the opportunity to request additional items of business be added to the Work Plan and these were as follows :-

- Hospital Activity Reporting with year-on-year comparison;
- Pressures on the Haematology Service; and
- Stroke Care Delivery

Decision

1. Noted the contents of the Work Plan;
2. Noted that the Laboratory Services would present to the Stakeholder Group in April; and
3. Agreed to include the additional items of business on the Work Plan.



**West Lothian
Council**

COUNCIL EXECUTIVE

PROCUREMENT ARRANGEMENTS – PROVISION OF LOCAL BUS SERVICES

REPORT BY HEAD OF FINANCE AND ESTATES

A. PURPOSE OF REPORT

To seek the Council Executive's approval to commence tendering procedures for the procurement of a one year framework agreement, with an anticipated start date of 1 October 2014, with possible three year extension, for local bus services as detailed in the report, employing the evaluation methodology and criteria detailed in the recommendation below.

B. RECOMMENDATION

It is recommended that the Council Executive approves:

- 1) The use of the Open Procedure whereby all suppliers expressing an interest in the local bus services contract will be invited to tender for the three routes in the report.
- 2) The award criteria as set out in Section D of the report.

C. SUMMARY OF IMPLICATIONS

I Council Values	Focusing on our customers' needs
	Being honest, open and accountable
	Providing equality of opportunities
	Making best use of our resources
	Working in partnership
II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)	Tenders will be issued, received and analysed in accordance with Standing Orders of West Lothian Council and the Public Contracts (Scotland) Regulations 2012.
III Implications for Scheme of Delegations to Officers	None.
IV Impact on performance and performance Indicators	This contract will help to provide a more responsive transport service in support of the council's public transport provision.
V Relevance to Single	Passenger transport services assist in delivering

Outcome Agreement

several SOA outcomes by providing access to employment, shopping and leisure opportunities.

Performance, activities and actions contribute to the delivery of:

SOA2 - We realise our full economic potential with more and better employment opportunities for our people.

SOA10 - We live in well designed, sustainable places where we are able to access the services we need, are relevant.

SOA15 – Our public services are high quality, continually improving, efficient and responsible to local people's needs.

VI Resources - (Financial, Staffing and Property)

The council has an annual revenue budget of **£79,711** for supporting the bus services detailed in this report.

VII Consideration at PDSP

None.

VIII Other consultations

The specification has been provided by Operational Services, who will also participate in the evaluation. The Corporate Finance Manager was consulted on budget implications. Legal Services and the Community Benefits Officer were consulted on inclusion of community benefit clauses. The financial management unit advised on minimum liability cover requirements.

D. TERMS OF REPORT

Background

The three local bus service routes were previously due to expire on 30 September 2014, with a possible extension period of up to 24 months.

Route Number	Description
1	Linlithgow town service Monday - Saturday
24	Juniper Green – Livingston Monday - Saturday
7	Armadale town service Monday - Saturday

The operator, notified the council they will not accept any extension proposal, having given 3 months written notice, so it is proposed to undertake a tender for these services.

The services being tendered are direct replacements of current council local bus services. The tender represents an interim contract to allow for the re-aligning of all council wide local bus services so that they end within the same timescales.

Historically the council has awarded passenger transport contracts on a "minimum subsidy" basis, whereby the council pays a fixed amount per month to the contractor and the contractor retains any fares revenue taken. However, in this instance

tenderers will be invited to submit bids on a “minimum cost” basis (whereby the tender price is the price required to operate the service and all fare revenues are submitted to the council) as well the traditional minimum subsidy basis. This strategy has been used in previous tenders and proven beneficial in delivering savings to the council.

In House Capability

It is not possible to provide the local bus service from the in-house resources available to Operational Services.

Procurement Issues

The requirement will be advertised in accordance with the European Union Directives. It is proposed that the Open Procedure is used whereby all suppliers expressing an interest in the contract will be invited to tender.

The following award criteria will be applied at the tender stage :

Price	- 70 %
Quality	- 30 %

The evaluation criteria are proposed following consultation with Public Transport. The criteria above are weighted in this manner to reflect the importance of overall cost of provision of the services whilst still placing significant importance on service quality, health and safety and sustainability elements of the evaluation. Regulatory items such as licensing shall be dealt with using mandatory criteria within the tender.

The results of the tender exercise will be presented to Council Executive in August 2014, before contract award, if there are any fundamental changes proposed to existing service provision.

The anticipated start date for the contract is 1 October 2014.

Sustainability Considerations

Following the Community Benefits in Procurement Procedure approved by the Council Executive on 4 June 2013, bidders will be required to detail any social, economic and environmental benefits which they will provide as part of their offer over the contract period.

For this contract it is proposed to incorporate a generic, non evaluated Community Benefits clause into the contract documentation. While this element does not form part of the Quality Scoring criteria, the Council will expect the successful Contractor to deliver such benefits as part of the Contract, and will be monitored as such, although having completed market research and following consultation with the Community Benefits Lead Officer, initial investigations indicate that there is no scope for a definitive Community Benefits clause directly related to the ‘core purpose’ of this contract.

Budget Implications

An annual revenue budget of £79,711 per year is available within Operational Services for the provision of support to the local bus services covered by this report.

E. CONCLUSION

It is recommended that the Council Executive approves the application of the

evaluation methodology detailed in Section D above for the tendering of the Contract for local bus services.

F. BACKGROUND REFERENCES

A copy of the tender specification for this contract is available on request from the Corporate Procurement Unit.

Appendices/Attachments: 1

Contact Person: Maria Dick, Senior Procurement Specialist
Email: maria.dick@westlothian.gov.uk

Tel: 01506 281803

Donald Forrest
Head of Finance and Estates

Date of meeting: 15 April 2014