



Planning Feedback - Roslin and Bilston Community Council

BHS-ART-XX-XX-L-A-64861-RBCC

Status Key:	Action Outstanding	
	Action Responded	
	Action Complete	
	Action Required after planning consent given	

Informative Item	Pre-Application Enquiry Feedback	Action Required	Status	Consultant Response / Action	Action By	Planning Comments	Target Date For Response to MLC Planning	Date Response Issued
01: Overview	03/10/24 In principle, Roslin and Bilston Community Council welcomes provision of a new high school for pupils resident in Bilston, Roslin and the surrounding area. Roslin and Bilston Community Council objects to the particular proposal contained in planning application 24/00415/DPP for the following reasons.	N						
02: Accessible for pupils	03/10/24 The proposed school is very badly related to its pupil catchment area. It is on the extreme southwestern edge of the catchment	Y		07/10/24 As outlined at paragraph 5.4 -5.5 of the Planning Statement, the new secondary and ASN education facilities are required to address education capacity requirements. The Learning Estate Strategy identifies the need for a new school to accommodate pupils within the west of Midlothian. The relevant primary school catchment areas are identified as Loanhead, Paradykes, Bilson and Roslin Primary Schools. These schools serve comparatively smaller settlements dispersed across the west of Midlothian. Cumulatively, the pupil population of these settlements requires a secondary school with a capacity of up to 1,600 to accommodate future pupil growth. This size of school is aligned with the Council's vision of a world class education system which recognises the benefits of provision of schools with larger pupil capacities. The settlement of Bilston is central to the settlements of Loanhead and Roslin and therefore reduces the cumulative travel distances for pupils across the catchment. In addition the site's proximity to the University of Edinburgh and the Midlothian Science Zone offer the opportunity for Partnership learning, supporting the STEAM Centre of Excellence objectives of the school. In addition to the above, the Town Centre First Assessment which accompanies the Application demonstrates that no alternative sites are available for the proposals within the catchment area.	HP		11/10/2024	11/10/2024
	03/10/24 The proposed school is at a location in its catchment area that is the greatest possible distance from Loanhead, which is the catchment community with the greatest number of pupils.	Y		07/10/24 Please refer to comment above	HP		11/10/2024	11/10/2024
	03/10/24 Lack of safe, attractive and convenient active travel routes means that pupils residing in Loanhead and elsewhere in the catchment are highly unlikely to walk or cycle to and from the school. This is contrary to development plan policy.	Y		07/10/24 Please refer to comment above	HP		11/10/2024	11/10/2024
	03/10/24 Paragraph 4.44 of the Planning Statement includes: "Recommended routes to the new school for pupils within catchment/walking distance will be confirmed in due course". At this stage it is therefore impossible to know what active travel routes will be proposed and whether they will accord with policy 13 of National Planning Framework 4. In view of development plan policy, adequate active travel routes are an essential part of the proposed development. The planning application is fatally flawed in not including all active travel routes. They must be an integral part of the development. They must be included in the application to demonstrate that they are adequate. At the same time, confirmation must be given that the funding for the school is sufficient to guarantee that the active travel routes will be provided no later than the day on which the school opens.	Y		8/10/24 Chapter 4 of the Transport Assessment provides information on active travel routes, including existing routes, routes which will be delivered prior to the school opening and aspirational routes which will be longer term projects.	SWE/HP/MLC		11/10/2024	11/10/2024
04: Irreconcilable conflict with A701 Relief Road	03/10/ 24 In relation to its catchment, the school is on the far side of A703. Construction of the A701 Relief Road will make the section of A703 that goes through the school campus part of the main traffic artery through this side of Midlothian. It will carry far more traffic than at present. The main access to the proposed school is directly from A703. For these reasons, the proposed site is highly unsatisfactory.	Y		07/10/24 The main access to the school has been designed and tested using traffic estimates for both with and without the relief road scenarios.	SWE		11/10/2024	11/10/2024

05: Traffic calming	03/10/24 Paragraph 4.88 of the Design and Access Statement includes: "Traffic calming measures will be implemented on the neighbouring stretch of the A703 to reduce high speed traffic in the area." Drawings showing a detailed design for the traffic calming have not been submitted. There is thus no means of assessing the effectiveness of any traffic calming.	Y		07/10/24 The proposed signalised access junction will slow traffic speeds on the A703, along with a reduction in speed limit and signage. The road will also be narrowed as a result of the widened active travel route which will be provided along the length of the A703. This narrowing will also encourage lower traffic speeds.	SWE		11/10/2024	11/10/2024
	03/10/24 Traffic calming would be incompatible with the new role of A703 as part of the A701 Relief Road. It has been predicted that the Relief Road will give drivers a timesaving of no more than three or four minutes. This timesaving is likely to be significantly reduced by traffic calming and additional turning movements generated by the proposed school.	Y		07/10/24 The A701 relief road project team has been consulted throughout the preparation of the material associated with the proposed high school, to support coordination and the sharing of information. It is our understanding that the A701 relief road project has taken account of the proposed high school.	SWE		11/10/2024	11/10/2024
06: Transport Assessment inadequate	03/10/24 The Transport Assessment (paragraph 7.1) says: "The Council have confirmed that the campus will become operational prior to the introduction of the A701 Relief Road. On this basis, it was agreed that the existing road network will be considered in the Traffic Impact Assessment." This is entirely unacceptable. The A701 Relief Road is expected to come into use relatively soon after completion of the school. The Relief Road will be in operation for virtually the whole of the lifetime of the school. This makes existing traffic conditions almost irrelevant. A transport assessment that takes account of the A701 Relief Road, that takes account of the inadequate provision for drop-off and pick-up (see below) and takes account of a detailed proposal for traffic calming is absolutely essential.	Y		07/10/24 The transport team at Midlothian Council advised that the Transport Assessment for the school should assume traffic conditions without the relief road in place in order to assess the worst-case scenario with regard to traffic impact. In addition to this, the design of proposed access junction for the school has been tested with and without the relief road in place. It is our understanding that the A701 relief road project has taken account of the proposed high school.	SWE		11/10/2024	11/10/2024
	03/10/24 The Transport Assessment does not give adequate consideration to the proposed drop off and pick up arrangements for pupils coming and going by private vehicles. It is estimated that there will be 107 trips bringing and taking pupils. It is reasonable to assume that most of the trips in the morning will take place in a fifteen-minute period prior to commencement of the school day. If the flow of this traffic is evenly spread out (which in practice it will not be) this means about six vehicles per minute. The submitted drawings are not clear, but they seem to show a drop-off/pick-up layby with space for three or perhaps four vehicles. This would not be sufficient to cope with demand.	Y		14/11/24 The pick up/drop off arrangement proposed within the school grounds will only be available for use by those with mobility issues or who have an essential need to carry out this activity within the school grounds. The emphasis on school travel is very much to encourage the use of sustainable travel modes, which is supported by significant investment in active travel infrastructure. Buses will also play a key role for school related travel. Those who do bring pupils to school by car will need to pick up/drop off out with the school grounds, noting that Traffic Regulation Orders will be put in place to restrict where this activity can take place to promote road safety and support the operation of the network. Such restrictions will further encourage use of sustainable travel modes.	SWE		11/10/2024	18/11/2024
	03/10/24 For many drivers, use of the proposed drop-off/pick-up is likely to be seen as inconvenient. Some will not resist the temptation to stop "just for a moment" on A703 near the main entrance to drop off children. This is likely to impede the free and safe flow of other traffic and must be taken into account when the necessary new transport assessment is carried out.	Y		14/11/24 See comment above	SWE		11/10/2024	18/11/2024
	03/10/24 The Relief Road and its A703 southern continuation will be part of the strategic transport network. National Planning Framework 4 (policy 13(g)) requires full assessment of proposals that have the potential to affect the operation and safety of the strategic transport network. The planning application must not be given consideration until all necessary assessments have been carried out.	Y		07/10/24 The relief road does not exist and the timescales for delivery are not certain. It is therefore for the relief road project to consider this matter.	SWE		11/10/2024	11/10/2024
	03/10/24 In places, the Transport Assessment relies on the A701 Relief Road in relation to improving facilities for active travel. For example, regarding the existing A701 from Ploverhall traffic lights to Straiton, paragraph 4.3 says there will be "an active travel corridor element, with segregated walking/cycling infrastructure". It also says that the A701 Relief Road will "contain active travel provision". It is inappropriate to refer to the A701 Relief Road and its possible associated works when these appear to be favourable to the proposed school while ignoring the obviously adverse effects of the Relief Road on the proposed school.	Y		07/10/24 The council has committed to delivering all active travel interventions necessary for the school with or without the A701 relief road in place.	SWE		11/10/2024	11/10/2024

				07/10/24 In 2020/2021 Midlothian Council undertook an appraisal of land along the corridor of the A701 that could serve the anticipated catchment area, was of an appropriate scale and was suitable for education use. Four locations were identified and examined in detail. The locations identified were land to the North East of the Gowkley Moss Roundabout, the South East of the Gowkley Moss Roundabout, the Loanhead Bing, and the Easter Bush Campus. As part of the appraisal, the sites were assessed against the identified strategic drivers for the project, which were reducing the respective education inequalities; economic inequalities and health inequalities; and contributing to the Council's journey to being net zero carbon by 2030. The sites were also assessed against compatibility with planning policy contained in the Midlothian Local Development Plan. The existing site of Beeslack was not included in this assessment as it did not meet these objectives.				
07: An open, professional site search is essential	03/10/24 The location of the proposed school is unsatisfactory in a number of ways, not least having a campus that is split by a main road, a road that is due to become even busier in a few years' time. With so much public money at stake, the need for a thorough site search (not just the very limited town centres first exercise) is irrefutable. Until there has been an open, professional site search with opportunity for public participation, including participation in drawing up the terms of reference and in the assessment process, planning permission for the present proposal must not be granted.	Y		The option appraisal concluded that the Easter Bush site presented a relatively straightforward site and no planning constraints to development. Due to this, and its strong alignments with the key outcomes of reducing education, economic and health inequalities, Easter Bush was identified as the preferred site. In Mid-June 2021, a paper was taken to Council requesting that Council approve the preferred site for the Beeslack Replacement School as Easter Bush based on the information presented in the report presented. This paper was approved by Council and has formed the basis for the design development of the school since then. Given the benefits of the site's relationship to both the surrounding community and University of Edinburgh, Midlothian Council is excited to continue to promote this location for this use while addressing the challenges the	HP		11/10/2024	11/10/2024
08: Conflict with development plan zonings	03/10/24 In the development plan, the east part of the proposed site is allocated for housing and the west part is within the Midlothian Science Zone. The proposed school conflicts with the relevant policies. The development plan does not identify a site for the proposed new school, so whatever site is chosen may well conflict with development plan policies. However, there are serious deficiencies regarding the proposed site. A proper site search across the whole of the proposed catchment area with opportunity for public participation has not been carried out. In these circumstances, the current proposal's conflict with the development plan is a significant and adverse material consideration	Y		07/10/24 As outlined in NPF4, "The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies." This statement reflects the provisions of Section 25 of the Act and the conclusions of Lord Clyde in the case of City of Edinburgh Council v Secretary of State for Scotland & Others 1997 S.C.L.R. 1112. The Planning Statement demonstrates that the proposed development is aligned with the Development Plan, including Part 7 of the LDP - Delivery Strategy. In addition relevant material considerations are addressed including educational need and the wider Council policies and strategies	HP		11/10/2024	11/10/2024
09: Provision for outdoor sports	03/10/24 Paragraph 1.0.2 of the Design and Access Statement says: "The proposed replacement Beeslack High School is a key strategic project in Midlothian Council's Learning Estates Strategy to improve and enhance educational, sporting, and community facilities across the authority for the rapidly growing school-age population and wider community." This is not true. The proposed outdoor sports provision would be to a lower standard than that at the existing Beeslack School. It would not accord with good practice recommendations. The proposed school would not have tennis courts. It would not have space for athletics. Its provision for outdoor activities is inadequate.	Y		4/10/24 Due to limited space within our site boundary as well as the constraints imposed on the site due to flooding we have not been able to provide a like for like sports provision for the new campus. However we have worked to provide as much sports provision as we can within the proposal. We hope to mitigate the loss of provision by retaining the sports provisions at the existing school and making use of Bilsdon Primary school's sports provision when possible.	WAS/MLC		11/10/2024	11/10/2024
10. Flood Risk	03/10/24 The conclusions of the Flood Risk Assessment include: "Although Seafield Moor Road is predicted to be inundated in the 200 year + climate change event, the access to Seafield Road would provide safe access in an extreme flood event." Other things being equal, it would be better to locate the proposed school on a site that is not in danger of having its main access flooded.	Y		24.10.11 Refer to site suitability response to 07.	HP		11/10/2024	11/10/2024

11. Midlothian Science Zone	03/10/24 Paragraphs 3.15 and 3.17 of the Planning Statement refer to benefits of proximity to the Midlothian Science Zone. A school anywhere in the proposed catchment would be reasonably accessible to the Midlothian Science Zone. In any event, physical proximity seems unnecessary. "..... digital technology will facilitate virtual sharing of teaching methods and curriculum delivery from University lecturers and partners across Midlothian and Scotland, and potentially internationally" (paragraph 1.0.6 of the Design and Access Statement).	Y		24.10.11 Refer to site suitability response to 07.	HP		11/10/2024	11/10/2024
12. Biodiversity	03/10/24 It is noted that the landscape management regime will be "in line with the Midlothian Biodiversity Action Plan". So that this essential standard is not later lost to sight, any consent for the proposed development must include a condition requiring adherence to the Biodiversity Action Plan. The condition must be backed up by the Education Authority giving a commitment to honour the condition. Roslin and Bilston Community Council also requests that there be prior consultation on details of all landscape work. This would apply for whatever site was selected.	Y		4/10/24 The current proposals align with the Midlothian Biodiversity Action Plan, retaining and enhancing habitats on site is an integral part of the landscape proposal for the site.	WAS		11/10/2024	11/10/2024
13. Conclusion	03/10/24 A new school is needed and would be welcome. The proposals in their current form do not demonstrate a development that would be satisfactory. In this context, we ask Midlothian Council to have in mind what the Scottish Government has previously said: Authorities are expected to be scrupulous in determining their own proposals, and should also take the greatest care to avoid any suggestion of bias when dealing with applications involving land in which they have an interest.	N						