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Laura O'Brien
Case Officer
Planning
City of Edinburgh Council

Our Ref: 13686
16th January 2026

Dear Ms O'Brien,

Re: 25/06329/FUL

Proposed placement of post and chain fencing, weighted mesh panels, and interpretation signs.
Land 325m N of Grant House, Pollock Halls of Residence, 18 Holyrood Park Road, Edinburgh

ScotWays was made aware of the above planning application only on 5th January 2026, upon re-opening after its festive closure, which means we have had relatively little time to consider this application. That said, as part of an established Radical Road stakeholder working group, ScotWays did have the benefit of an October site meeting with Historic Environment Scotland (HES) in Holyrood Park, during which public access to South Quarry and the Radical Road was discussed. As a result, our comments here will partly be influenced by our understanding of information shared prior to the application. If any misapprehensions have arisen, we will be pleased to have these brought to our attention.

Background

For over seven years, the Radical Road right of way in Holyrood Park has been closed as a result of HES concerns about rockfall, and access to Hutton's Section and Hutton's Rock has also been affected. Working with other stakeholders, ScotWays has been seeking reinstatement of public access to this much-loved area of Holyrood Park, renowned worldwide not just as an iconic landscape, but for its place in geological and social history, and its associated educational importance.

Although ScotWays continues to have concerns about the Radical Road's closure, we consider that this planning application is an important first step towards restoring public access. We also recognise that this proposal has a time sensitivity – 2026 being the James Hutton Tercentenary. As the timeframe for the proposed works is relatively tight, we wish to avoid slowing the planning process, so will not object to this application albeit we could reasonably have done so. Instead, we have chosen to recognise the good intent of HES and offer the following comments in the hope these prove of assistance, both in determining the application and considering the way forward.

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Current proposal

The proposal is confusingly set out in the application and associated drawings, but we understand it relates to:

- permanent (low) fencing in South Quarry managing public access in respect of its rock faces;
- removal of high (gated) mesh fencing and its replacement with similar temporary fencing in a different position, thereby restoring public access to a stretch of the Radical Road which is currently obstructed;
- permanent/temporary interpretation signs with various purposes including public access management (safety information and reasons for closure) and education.

Confusion arises because the planning permission sought is described as permanent, but facets of it are temporary. Any consent granted should clearly spell out the situation for each aspect of the proposal. Also, despite what is stated on the application form, no physical route is being constructed.

Further confusion arises because the application specifically states that NO changes are proposed to public paths, public rights of way or public right of access. As set out above, this application is clearly intended to manage/influence/control public access, in relation to the re-opening of an area which has been closed to public access by HES. Again, in any consent granted, impacts on public access need to be clearly acknowledged. As to the matter of a public right of way, we shall address that below.

Wider impact of proposal upon recreational amenity

The current appearance of the Radical Road obstructions are eyesores upon the landscape of Holyrood Park. The impression given at the site visit last year is that the low fencing proposed to manage footfall near the quarry rockfaces would be designed not to detract from the setting but instead encourage safe public access whilst not being unduly restrictive.

Removal of the existing high (gated) mesh fences would certainly improve the appearance of this area of the Park, albeit the intent is to replace these with another in a different position. The application is understandably silent on the topic of the equivalent ugly fencing at the other (far) end of the Radical Road as this is outwith the application site. However, the planning status of all the existing fences is unclear, so we suggest this too could be mentioned in any consent granted. We ask that it is confirmed this new high fence is temporary in status and accordingly a timeframe set for removal. This would accord with the HES indication that further measures are being considered in relation to the remainder of the Radical Road, so is a reasonable request.

ScotWays welcomes the principle of renewed informative signage, whether it be for educational or access management purposes. In relation to the latter, we suggest that despite the existence of the Holyrood Park Regulations, any such signage should accord with best practice principles in line with the Scottish Outdoor Access Code. We look forward to sight of the proposed notices.

Right of way

Although the Design and Access Statement (D&AS) refers to statutory protections afforded to a scheduled monument and SSSI, there is apparently no recognition by the planning application that permission is required because the proposed works affect a public right of way. Worse than that, as noted above, it is specifically stated that no public right of way is affected, despite the new high mesh fencing which is proposed to be erected across it. In the absence of due process to date, the Radical Road is already unlawfully blocked, so ScotWays is very concerned that this proposal as it stands seeks to continue this right of way's obstruction.

If necessary, there are procedures for temporarily closing rights of way for safety reasons, and we have previously brought this to the attention of HES. ScotWays recommends that alongside the proposals which are the subject of this planning application, a Temporary Traffic Regulation Order

is made to temporarily close the right of way - provisions for this are available under Roads legislation (s.14 of the Road Traffic Regulation Act 1984), as a public right of way is a road under the terms of the Roads (Scotland) Act 1984. This would mean the route is not lost to the general public, as the Order protects its right of way status whilst it is unavailable for use. Once appropriate works have been carried out, at an as yet unknown date, the right of way can be re-opened having been preserved for future public use.

A formal temporary closure process such as that which we suggest helps both the general public and the land manager as it protects the route's status, while providing a legal method within which options can reasonably be explored, i.e. the blocking fences would no longer be an unlawful obstruction. Use of this formal process also assists the Council in evidencing that it is meeting its legal obligations towards rights of way, including its duty under the Countryside (Scotland) Act 1967.

Summary

To be clear, ScotWays recognises that the intent of this application is to safely manage public access, so does not object. Although we have long-standing concerns about how this right of way has been treated, we wish to continue to engage positively with HES and support improvements to Holyrood Park for the benefit of the general public. That said, we strongly recommend that the Radical Road right of way is protected via use of a formal process safeguarding its future.

I hope the information provided is useful to you. Please do not hesitate to contact us if you have any further queries.

Yours sincerely,

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Eleisha Fahy
Senior Access Officer