

# SPOKES *The Lothian Cycle Campaign*

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This is a response on behalf of *Spokes, the Lothian Cycle Campaign* in respect of the planning application for the Forth Bridge Walk Reception Centre and Associated Development.

*Spokes* wishes to object to this planning application, including the proposals for cycle access to the proposed development site, as set out in this submission.

The proposals place primary emphasis on safe and convenient access to the site by car. There has been a significant reduction in measures (compared to the previous application) to support travel by public transport, foot, and cycling. By contrast, the size of the car park (approved on appeal) has remained broadly the same (1 space less) despite the venue being scaled down.

No material account appears to have been taken of the changes in the area, or wider society, which have occurred since the previous application, for example, the increase in cycling.

*Spokes* has previously highlighted the opportunity to provide good quality access to the reception hub from the adjacent high quality footway/cycleway, Core Path 10, which connects directly to the well-used NCN route 1 between Edinburgh and Fife at Dalmeny Village and NCN route 76 at the bottom of The Loan in South Queensferry. Core Path 10 is also well used by local cyclists and walkers, including those with mobility impairments, and a good quality link suitable for all users is essential to meet your objective for the site to become a significant node for residents and visitors using the path network in South Queensferry.

At the committee hearing for the previous planning application, Network Rail confirmed that there would be direct cycle access (see response to Councillor Booth here [https://edinburgh.public-i.tv/core/portal/webcast\\_interactive/479876/start\\_time/9489000?force\\_language\\_code=en\\_GB](https://edinburgh.public-i.tv/core/portal/webcast_interactive/479876/start_time/9489000?force_language_code=en_GB)). The new planning application does not contain such a commitment, thereby watering down the commitment to support active travel.

Furthermore, other measures that will discourage active travel include the removal of direct ramped access to the station platform from the upgraded path up to the station. This is to be replaced by stepped access only. This is another watering down and does nothing to support active travel. By contrast, the increased reliance on motorised vehicles will only increase the traffic in the area, bringing with it an increased risk to active travellers.

The Transport Statement sets out Core Design Principles, which include “promotion of walking, cycling and public transport as primary means of access” and “provision of clear,

direct, and high quality linkages to the site from surrounding active travel facilities". The Transport Statement also makes repeated reference to the provision of a ramp linking Core Path 10 and the at-grade bridge (e.g. p.4, p. 6, and paragraph 4.2.4 on p28). However, it is very disappointing to note that the site plans including Diagram 2.3 in the Transport Statement indicate only steps linking the site and Core Path 10, and the proposal only refers to a 'runnel' alongside the steps to the existing shared path to the south of the hub area which will be inadequate and is likely to result in cycle/pedestrian conflict on the steps. The omission of a shallow gradient ramp between the shared path and the Hub suitable for all ability access will also mean that those with mobility impairments will be unable to reach the Hub and access the new accessible route to the railway station. The runnel is also entirely unsuitable for the increasing number of cyclists using electric cycles. Since the last application was made there has been a significant increase in the number of electric cycles in use and they are particularly popular among those who are unable to use conventional cycles. Attempting to push a heavier electric cycle up a runnel could be particularly dangerous and result in injury.

The failure to provide a shallow gradient ramp linking Core Path 10 with the site and the loss of the previously proposed direct ramped access to the station platform are not only lost opportunities to encourage cycle and pedestrian access in accordance with the Edinburgh Design Guidance, they are also contrary to Development Plan and City Mobility Plan Policy. LDP Policy DES 7 specifies that the layout of new development should encourage walking and cycling and safe and convenient access in and around the development. City Mobility Plan Policy Movement 14 requires that development should "enhance and where necessary expand the walking/wheeling network to serve and connect key destinations across the city"; and Movement 24 requires that paths should be designed to "maximise safety and accessibility for all needs and abilities". The expectation that cyclists should struggle to push bikes up a runnel next to a set of steps to access the site is a sub-standard, inconvenient and potentially dangerous proposal and one which will exclude those without the ability to push their bike up a steep slope.

The difference in level between Core Path 10 and the site is such that a shallow gradient ramp could easily be provided. Indeed, there is already an informal shallow gradient path which is used by pedestrians and cyclists from Core Path 10 which runs along the western edge of the site to the top of Jacobs Ladder. This should be upgraded to form a convenient all abilities access route to the site and the application should not be approved until this change has been made.

The Transport Statement wrongly focuses on the parking issues in South Queensferry. Parking is the symptom, with traffic by car being the cause of the problem, and the Transport Statement fails to properly address the changes to traffic management in South Queensferry since the previous application.

South Queensferry High Street now operates a one-way system, resulting in an increase traffic flow along Rosshill Terrace and Station Road, which has three schools on it. No additional safety measures have been provided for this route and the proposals to continue with broadly the same car parking will support an increase in traffic and only exacerbate the current traffic problems. With government targets to reduce car use by 30%, the question

the Council must address is where (if it allows a car park at the hub) will it reduce traffic elsewhere to offset the increase in traffic here. It is often easier to prevent an increase in the first place than responding to the problem later.

We also note that some lighting is to be provided on the access routes between the Hub and the railway station and Hawes Pier which is very welcome and will ensure safe access on these routes. However, it remains disappointing that there is no commitment to extend the existing lighting which currently extends from the start of the route at The Loan to the west end of Ashburnham Loan. Extending the lighting a further 250m to the proposed Hub, and in addition also from the hub to Dalmeny would provide a safe walking and cycling route between the Hub and South Queensferry Town Centre at night and provide a lit off-road path network linking the Town Centre, Hub, Hawes Pier and railway station. This would be of tremendous benefit to the economy of the town, provide a good network of off-road paths for local people to use at all times of the day and would importantly encourage visitors to the Hub to access it as sustainably as possible.

#### Recommendations

- Reduce car park size to 37 spaces (per the original approved application, pre- appeal)
- Provide direct cycle access from the existing shared pathway (per the original commitment by Network Rail)
- Provide continuing lighting all the way along the shared pathway from The Loan to Dalmeny
- Reinstate ramp access to the station platform from the upgraded path to the station
- Introduce further safety measures along Rosshill Terrace and Station Road

Only by committing to these recommendations will the Council be able to support wider government targets. As a final point, as a public body, Network Rail should be expected to support wider government policy, and it is disappointing that their proposals currently do not.

Ewan Jeffrey, for Spokes Planning Group  
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