

We would like to make the following comments on the above ETRO.

It is difficult to comment fully on this scheme, as it has not yet been completed. In addition, as construction of the southerly section was very slow, we feel that this consultation period will have elicited comments made when construction was still underway, and will therefore not reflect the experience of using the scheme in its intended fashion (the purpose of ETRO-enabled schemes) – we would suggest that attention is paid to the submission dates of comments and that this issue is kept in mind when interpreting them. We would also suggest that CEC consider carefully how to obtain feedback on completion of the northerly section, as this represents quite a profound change in provision, and deserves to be tested and evaluated fully once installed.

However, we would like to offer some comments with the above provisos, and will frame this considering a journey from NCN1 at the most southerly point of the scheme to Silverknowes Promenade at the north end.

We feel that the general principle embodied in this scheme is extremely sensible. It allows an important connection (from NCN1 to the Promenade) to follow the obvious desire line. We would also commend the decision to use unidirectional lanes on each side of the south section to facilitate easier connections to the network of surrounding quieter streets, a principle described in the Edinburgh Street Design Guidance (ESDG) document and one that we would like to see used more frequently around the city.

SOUTH SECTION

The more southerly section is particularly important in facilitating active travel to and from Davidson's Mains Primary School, as this section sees substantial footfall as a key part of the school's catchment area. Indeed, this section of the scheme (from the Parkway roundabout to the Drive and onwards to Main Street) essentially forms a key "spine" for travel through the middle of the catchment, and we would view this as an extremely important consideration for evaluation of the scheme's benefits. This factor is therefore likely to encourage use and meet the strategic goals set by CEC for the project (to some extent – see below for comments on issues that need further improvement).

The retention of the existing segregation between Drive and Court on the east side is useful and appropriate (also c.f. above comment on travel to the primary school), and the extension of segregation on the west side of this section is welcome.

Thereafter, the absence of any substantial segregation is poor. It is in some respects a shame that the previous quiet route is being replaced by unprotected, paint-only provision (albeit that the lack of signage and off-desire line nature of that route limited its uptake).

The floating parking protection to the immediate north of the shops works reasonably well, and appears to be having some traffic-calming effect. However, observation suggests some vehicles are maintaining quite high speeds through this section when not opposed by traffic from the opposite direction and are impinging on the section of mandatory cycle lane immediately opposite. We feel that some segregation for the cycle lane is needed here, and this would have a further traffic-calming effect.

The remainder of the route to the roundabout at the Parkway is unprotected and anecdotal experience is that the effective widening of the road by removing parking is allowing higher average speeds – the two “chicane” installations are not sufficiently restrictive to keep speeds low, and the absence of any segregation means cyclists are left at much higher risk than is acceptable. We note that recent CEC traffic surveys have shown average speeds on this road to be around 27mph, higher than the threshold for action on a 20mph limit road. We therefore strongly urge you to look again at this section and to provide additional segregation or other protection, perhaps by installing further floating parking bays to protect longer sections of the cycle lanes. Given that the current floating parking installation does not seem to be impeding bus movement, this should also be acceptable at other locations along this section.

We note that most side road entrances along this section have been marked to reduce junction “splay” and have had Rosehill defenders placed to enforce this change. We welcome this approach, but note that paint only has been left at the northern entrances to the Crescent and Hill. This is insufficient to create speed reduction for vehicles crossing the cycle lane on the west side of the Road, and requires work to correct this omission. We suspect that some extension of dropped kerb provision may be necessary at these locations – the current drops seem to be poorly placed at quite an acute angle to the pavement “line of travel”. This investment would be worthwhile regardless of the longer-term plan for the ETRO installations.

The Farm Road/ Parkway roundabout offers no protection to cyclists and has a high volume of traffic, particularly at peak times. This is unacceptable, particularly in contrast to the previous quiet route being sited to allow cyclists to cross at the easterly zebra crossing. This needs urgent attention to improve safety, with segregation and parallel crossings on at least the west and east arms of the roundabout (although other directions of movement through the roundabout should

also be considered – cyclists may wish to move between Farm Road and Parkway, or to turn right from Road to Parkway).

NORTH SECTION

The section of Silverknowes Road to the north of Parkway remains partially unsurfaced, with no provision for protected cycling as apparently intended in the original plans. We are unsure what the current intention is for this northerly section and obviously cannot comment on the basis of completed infrastructure on the ground. However, the plans previously released suggested that a 2m wide bidirectional protected cycle lane was to be installed on the east side of this section of the road. We would strongly object to this design on the grounds that such a narrow lane would be inherently unsafe on such a long, steep gradient section. Indeed, we would view this as being incompatible with ESDG, which clearly indicates that routes on steep slopes need to be considered as having their own design requirements (although we would note the unhelpful lack of specificity in ESDG on issues such as this). Thus, a bare-minimum width lane is unacceptable as it poses a very high risk of collision between passing cyclists travelling uphill and downhill, with the latter naturally travelling at higher speeds. We would strongly urge CEC to review the design of this section, and to consider all alternative provisions: for example (but not limited to) (a) reverting to the previous Travelling Safely design or (b) an uphill only lane (with downhill travel facilitated by a shared path designation for the west footway).

At either end of this section, one lane of cycle traffic will need to be crossed over to the opposite side of the road for entry to/ egress from the segregated section (with motor vehicle traffic moving in both directions across this). At the north end, cycles will have to make a further roundabout crossing to reach the promenade. What is planned to protect cycle traffic through these sections? Is this sufficient to mitigate the obvious level of risk? The lack of treatment of the more southerly roundabout suggests it will not be, so we would again request that this is re-examined.

In summary, we would like to express strong support for the principle underlying the experimental layout on Silverknowes Road, but have strong reservations about aspects currently on the ground and still to be implemented. We would urge you to consider these very carefully and to make appropriate changes – this is a strength of the ETRO-based process for such a scheme and should be taken advantage of here.