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Dear Ian Elder,

THE GLASGOW CITY COUNCIL, St Enoch District Regeneration Framework

Thank you for the opportunity to contribute to the St Enoch District Regeneration Framework consultation. GoBike is a voluntary organisation campaigning in the Strathclyde area for better infrastructure, policy and political support for cycling. Cycling should be a safe, efficient, clean and healthy form of active travel for people of all abilities and ages and using every variety of cycle. The comments which follow are made in the context of GoBike's campaign aims, and of the need to create conditions which make cycling attractive to the large numbers of people for whom it currently seems much too risky.

GoBike is happy to support the vision and ambition of the proposals to prioritise people over motorised traffic by continuing the ideas in the Broomielaw DRF. In particular, GoBike welcomes the specific mention made in projects of:

- “fully accessible pedestrian/cycle routes along both banks” (River Park, p 48)
- with “crossing points located on natural ‘desire lines’, straight, wider and safer and clearly indicated pedestrian and cyclist priority over cars” (Calm Quays, p 56)
- and “long distance pedestrian and cycle routes ... connecting far up and downstream” (Active Attractive Promenades p 58)
- which “seamlessly connect to the urban grid of central Glasgow” (Great Streets and Places ... with “crossings [that are] easy and without guardrails” (p 102).

These are the kind of provisions that must be made for cycle traffic if the city centre is to be a place for people rather than cars. Transformative numbers of people need to choose to cycle rather than drive for short trips. Glasgow's cycling provision should have the ambition to match that of the world's best. The existing guidance for cycle infrastructure, *Cycling by Design*, was published back in 2010 and has reportedly been under review for several years. Instead of trying to hit the moving target of best practice, planning guidance needs to find a way of requiring designs for cycle traffic (segregated or unsegregated) to match, and keep matching, international standards as they develop.

It is GoBike's view that the DRF will be strengthened by including the following prominently.

- Ending the domination of the streets by motor traffic and discouraging private car use in the city centre is a matter of political will and courage.
- In a future in which most people choose to cycle rather than drive for local trips it will be possible for everyone to cycle safely and conveniently from anywhere to anywhere, door-to-door, not just on designated routes.

- *Designing Streets* sets out that ‘all thoroughfares in urban settings ...should normally be treated as streets’ (the public realm functions of ‘streets’ are more important than those related to motor traffic, whereas for ‘roads’ the primary function is the movement of traffic). *Designing Streets* is shown as the guiding principle in Updated Mobility (p 147) and the related action point (p 290); it should be cited more prominently.

It is GoBike’s view that the DRF Action Plan can be strengthened with the following changes.

1. The most important project of all is said to be that of developing a new ambitious transport strategy based on the findings of the Connectivity Commission (p 128). Various components of the Action Plan show implementation of a revised transport strategy only in Year 5 (and this is before the inevitable timetable slippage). A faster way needs to be found of reaping the benefits of the Connectivity Commission’s work.
2. Planning guidance normally applies only to new developments. Building on the statement (Updated mobility, p 102) that “**existing streets** should be designed to form long, comfortable and continuous routes for cyclists and pedestrians”, an action point is needed for incremental improvements to (for example) turnings, junctions and crossings to prioritise pedestrian and cycle traffic. Steady low-key improvements are needed as well as the long term big-bang Grand Projects.
3. There is no action point relating to the importance of urban nodes and gateways (p 104). On the road network these are the places where space is most limited and the prioritisation of walking and cycling is therefore most challenging. Action is needed to find solutions first rather than last.
4. Traffic modelling is called for in many of the action points. This takes time and resources, the input assumptions and system bounds are critical and modelling does not have a track record of predicting traffic induction or evaporation. A major reduction in the number of private cars in the city centre is a matter of policy and political will so what is the purpose of traffic modelling under so many headings? The document itself states that “[Traffic] circulation should only be considered at a city and regional level” (p 128 Updated Mobility) and “Measures can only be properly assessed in wider city context” (overprinted on pages 128 and 135, Updated Mobility).
5. There is a potential clash of objectives between the actions Active Attractive Promenades (pp 254-5) in which continuous walking and cycling routes along the river are still being implemented in Year 5 and Activating the Quays (pp 256-7) in which pavilion sites are being promoted in Years 2 to 4.
6. Smarter Parking in St Enoch (p 286) calls for surface and on-street car parking to be reduced, with more provision at the edge of the city. This should include parking for electric (low emission) cars, which take up road space and contribute to congestion as much as conventional vehicles. Charging points for electric vehicles should be confined to the city-edge car parks, existing on-street charging points should be removed, or possibly converted to charging points for e-bikes. Parking for cycles must include provision for those larger than conventional cycles, such as tandems, cargo bikes, adult tricycles, trailers.
7. Mixed and Repopulated St Enoch (p 304) calls for an increased residential population in the district. Planning requirements for cycle parking at residential buildings needs to be reviewed to ensure there is provision for larger than standard cycles, for example tandems, cargo bikes, trailers.
8. The Dear Green Place - Glasgow Green (p 306) calls for a review of the events capability of Glasgow Green. The provision for events must allow through routes to stay open for people walking and cycling.
9. The Dedicated St Enoch Team (p 322) needs to include a member who is skilled at marshalling and sharing the growing body of evidence from world cities that the kind of changes proposed have a positive effect on businesses and people’s lives. The team must be able to pre-empt the objections of people who sincerely believe that such changes will spoil their lives or livelihoods (some of them may even be right). The team’s traffic advisor

must be someone with an understanding and preferably experience of designing streets for non-motor traffic, cleverly using (for example) filtered permeability, false one-way streets, materials and design that unmistakably show who has priority..

Finally, GoBike also welcomes the acknowledgement of the need for optimum accessibility for those with mobility, sensory impairments or autism to be integrated in street design (Updated mobility, p 147). Campaigners do not want better conditions for cycling to be at the expense of other vulnerable users of the streets. We are looking for better provision for all non-motorised traffic.

We trust these comments and suggestions will be taken on board to ensure that the St Enoch Development Regeneration Framework provides a beneficial base for the development and improvement of the St Enoch area for years to come.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tricia Fort', written in a cursive style.

Tricia Fort
for Consultations, GoBike