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Dear Sir/Madam,

**THE GLASGOW CITY COUNCIL,
MOUNT FLORIDA) (TRAFFIC REGULATION) ORDER 201_**

Thank you for your email of 27 August in response to our concerns about the proposed changes in the waiting and loading regime in Mount Florida. We have further concerns about your response and will take these in the order presented in your email:

Angled/echelon parking on Clincart Street and Bolton Drive and One-way streets

You state that “there is a desire from the local community to park their vehicles at an angle facing into the kerb ... to maximise parking provision.” This may be convenient for the members of the local community who own cars but it is not in line with good practice for neighbourhood streets.

We refer you to the Scottish Government Policy Document “[Designing Streets](https://www.gov.scot/binaries/content/documents/govscot/publications/corporate-report/2010/03/designing-streets-policy-statement-scotland/documents/0096540-pdf/0096540-pdf/govscot%3Adocument/0096540.pdf)”, <https://www.gov.scot/binaries/content/documents/govscot/publications/corporate-report/2010/03/designing-streets-policy-statement-scotland/documents/0096540-pdf/0096540-pdf/govscot%3Adocument/0096540.pdf> which states on page 15 “Street user hierarchy should consider pedestrians first and private motor vehicles last”. In this case you are clearly reversing this hierarchy.

An internet search for “echelon parking” brings up this quote, very prominently, from the Road Safety Knowledge Centre “**Echelon Parking**: National Guidance is founded on the premise that collisions are much less likely when the driver can see where he or she is going. Reversing blind out of an **echelon parking** bay is either gambling or an act of faith, not an informed driving decision.” Is this really the sort of environment that the local community wishes to live in? It is to be hoped that you have advised them that they are putting other road users in danger if this arrangement is adopted?

While there appears to be little analysis of echelon parking in the UK, this [document](https://d3n8a8pro7vhmx.cloudfront.net/playhouseparklets/pages/26/attachments/original/1431809794/Reverse_Angle_Parking_Brochure.pdf?1431809794), https://d3n8a8pro7vhmx.cloudfront.net/playhouseparklets/pages/26/attachments/original/1431809794/Reverse_Angle_Parking_Brochure.pdf?1431809794 from the United States sets out clearly and concisely the benefits of reversing into parking places and driving forwards out.

We are concerned that you regularly quote Police Scotland when denying contraflow cycling and removing permeability for cycling. Perhaps GoBike could be invited to your next meeting with them to discuss and clarify the damage that is being done to the cause of active travel by this reduction of street access for cycling?

We note that you are considering the introduction of echelon parking on Clincart Street and we are very concerned at your philosophy of maximising the storage of private vehicles while reducing the attractiveness and feasibility of active travel. This is completely contrary to both national and local government policy.

We also refer you to the document attached to this letter “Contraflow Cycling” produced by the European Transport Safety Council, which sets out clearly the benefits of contraflow cycling over with-flow cycling. Primarily, the driver and the cyclist are able to see each other as

opposed to with-flow cycling when the cyclist has very little chance to take evasive action. Studies have confirmed that accidents are lower for contraflow cycling.

You suggest in your letter that we have asked for a contraflow cycle lane; we have not. The Scottish Government document, Designing Streets, referred to above, states on page 18:

“Cyclists should generally be accommodated on the carriageway. Only where traffic volumes and speeds are high should the need for a cycle lane be considered”.

We are simply asking for your default policy of contraflow cycling to be enacted on the streets you currently propose to make one-way. Nairn Street, in Yorkhill, is an example of this default policy and we are unaware of any concern about the situation there. A photograph is attached for your reference.

Buildouts

It is widely documented that businesses exaggerate the need for parking right outside their premises. As stated above we are very disturbed that national and local government policy is not being followed particularly since studies show that once good cycling facilities are introduced local businesses experience an increase in custom.

Parking/loading restrictions at junctions

Thank you for your clarification of the requirement for Traffic Regulation Orders to allow the stipulations of the Highway Code to be enforced. This is very unfortunate and it seems that bureaucracy has caused there to be a drain on public finances, which surely could have been solved in a more time and cost effective way.

Restricted Parking Zone surrounding Hampden Stadium

It is surprising that there is so much pressure on parking in this area which is so well-served with public transport and so near the city centre that you are considering denying two-way cycling access to provide more storage spaces for private vehicles. Could you please supply the results of your daytime and night-time parking surveys to us to confirm your reasons for reducing cycle access in Mount Florida?

We will not withdraw our objection further to your email. We remain concerned that the increased storage of private vehicles now being contemplated will make it increasingly difficult for people to cross the streets and denies people the availability of cycling both ways on some streets. Overall your proposals are out of line with current thinking on the Climate Emergency and other moves to reduce the use of private car travel in Glasgow.

Yours sincerely



Tricia Fort
for Consultations, GoBike