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GoBike notes your proposal to consider introducing traffic regulation orders to support an avenues project on Argyle Street, to revoke a bus gate, and to reverse one-ways on Albion and Shuttle Streets, circulated to us by email on 2023-03-03.

Safety Context

Being a street that connects with the M8 motorway, and for being in a city centre, Argyle Street is heavily trafficked, sees substantial footfall, and forms a vital link to pedestrianised areas of the city centre and rail stations. Since 2000, according to publicly available datasets, the section of Argyle Street affected by these proposals has seen: • 17 collisions where someone cycling was injured, • 11 collisions involving goods vehicles (three of which involved both a goods vehicle and injury to someone cycling), and where • at least 7 *children* sustained *serious* injuries within the same timeframe. An amended streetscape is therefore vital.

Stance

For clarity we number your proposals as follows:

1. proposed TRO changes to Argyle Street to support new cycleways;
2. proposal to make permanent a Spaces for People intervention (an east-bound one-way prohibition on Argyle Street with contraflow cycling);
3. proposed revocation of • the bus lane (lane 2) on Argyle Street west of Oswald Street, • a right-turn bus lane (lane 2) on Oswald Street, and • the bus gate beneath the Hielanman's Umbrella on Argyle Street;
4. amendments to existing • parking places and • waiting and loading restrictions on affected roads; and a
5. proposal to make permanent changes to the one way restrictions on Albion Street and Shuttle Street.

GoBike supports proposals 1 and 2, opposes proposal 3, and takes no view on proposals 4 and 5, for the following reasons (numbered accordingly).

1. We welcome any proposal to introduce protected cycleways, and especially where a reduction in carriageway width is a means to achieve this. While we admire the overall aims pursued in this avenue design we have to make a series of comments on the proposals and designs shared with us.
 - (a) Rather than prohibit “driving in” a cycle lane, we would prefer the language of the TRO to be altered to prohibit motor vehicles from “being in” a cycle lane, in order that enforcement can be taken against parked or abandoned vehicles (this would be consistent with language used in schedule 46B and replicate language used for St. Andrew’s Drive, by way of a precedent).
 - (b) At either end of the cycleways, transitions look to pose potential problems for people cycling: when travelling eastbound, the cycleway is marked by ‘END’ markings and is positioned in such a way as not to be conducive to access the eastbound lane under the Hielanman’s Umbrella; similarly, when travelling westbound, toucan crossings are proposed which do not appear conducive to significant uptake in cycling (key message 1 [1]), and which seem unlikely to easily accommodate non-standard cycles such as cargo bikes, handcycles, or tandems. Cycle gates [2] employed within the signalling sequence at either end of these cycleways would allow the same street space to be alternately used for active and motor traffic modes, to offer a more scalable design and incentivise use of the cycleways: when travelling eastbound, this would aid people cycling to adopt a position in lane 2 before the junction with Oswald and Hope Streets to give protection when integrating with other traffic entering the one-way section.
 - (c) Turns into Oak Street and Cadzow Street should either have cycleways set-back from the junction mouth, or these turns should be made right-angled in order to slow turning vehicles, in line with guidance in Cycling by Design [1] (pages 162 – 165), which states that a cycle lane over priority junctions such as these should only be used if neither a continuous track nor a bend-out layout is possible (p170 [1]). Setting the cycleway back from the main carriageway at priority junctions would additionally improve its overall *directness* as a required offset from the carriageway would then align with offset distances needed to accommodate nearby parking bays and bus-stops.
 - (d) This same principle of design (there being a separation distance between the carriageway and cycleway) is consistent with the pilot avenue on Sauchiehall Street and would be best re-employed for this project throughout the length of the proposed Argyle Street cycleways. One mitigating reason stated during previous public consultation on this project is proximity of the street surface to underground rail tunnels and a requirement for greenery, but in our view:
 - greenery necessarily takes a lower design precedence to road safety;
 - greenery and planting need not necessarily take the form of sustainable urban drainage, and could instead be low-level planting (e.g.

as used on Garscube Road); • even if drainage systems are pursued, engineering interventions such as non-slip gratings can be used as coverings to maintain direct passage of a cycleway over such features. To our understanding, there are consequently no material reasons for cycleways shown on the drawings to be as indirect as they appear.

- (e) We recognise that opportunities have been taken to position a new crossing to the west of Washington Street, and to use this to facilitate onward connections to the National Cycle Route 756 on Argyle Street and Elderslie Street and connectivity with the train station. While the introduction of a new crossing is of course welcome, sightlines are reduced as a result of the bus-stop west of Washington Street on the northern (eastbound) lanes of Argyle Street, such that zig-zag markings do not afford the normal distances required for visibility of the crossing. There is no shortage of space at this location; a more ambitious design might narrow the carriageway earlier to afford easier crossing distances and a repositioning of either the bus-stop or crossing to improve visibility.
 - (f) From these drawings alone, signal phasing is not stated for signal-controlled junctions featuring protected cycleways. Due to the risk of conflict between motor traffic and people cycling, separate phases would be required for each of these modes of east-west traffic, which the drawings suggest would also be separate from pedestrian phases. ‘CYCLOPS’ designs [2], or designs similar to those used on Victoria Road, would allow pedestrian and cycle phases to be combined to improve the level of service (p174 of [1]), and to further support (d).
 - (g) In the drawings shared, the legend indicates that Schedule 36A extends eastward to West Campbell Street, where Schedule 36B should instead be used for this one-way cycleway on the north of Argyle St.
2. GoBike supports making permanent the temporary contraflow cycling lane as a mechanism to support *filtered permeability* and encourage modal shift. For the contraflow cycling lane shown, for its extent between Buchanan Street and Hope Street, it would be preferable for the Schedule 5 (double yellow) lining to be positioned on the carriageway side of the solid line between the one-way and contraflow lanes, to further emphasise this boundary, rather than along the contraflow lane’s nearside kerb if possible.
 3. GoBike opposes revocation of the bus gate between Oswald / Hope Street and Union / Jamaica Street on grounds of social justice, safety, and clarity.
 - (a) Bus gates improve timing and reliability of public transport, which this proposed change would threaten to undermine. Maintaining limited traffic volumes on this short link between sides of the city centre would additionally support permeability for emergency services.
 - (b) The present bus gate stands as a disincentive to large vehicles and therefore incentivises use of cargo bikes (permitted to use the existing bus gate) for last-mile distribution. This is the form of last-mile logistics we should encourage in our city, rather than permit commercial interests to maintain a common practise of choosing to use heavy, dangerous vehicles for operations in a largely walkable city-centre.

- (c) Moreover, there is a risk of ambiguity in terms of what constitutes a ‘goods vehicle’ for the purposes of the proposed TRO, such that this proposed change would soften recognisably defined parameters: road users might generally consider ‘goods vehicles’ to include not only heavy but also light goods vehicles; and considering that in recent years the consumer vehicle market also includes vans and pick-up trucks marketed as being capable of haulage, there is risk this change would be impractical to enforce; which would therefore risk undermining the credibility of any remaining modal prohibition.

We are furthermore aware of the intention to eventually permit motor traffic through the presently pedestrianised section of Argyle Street between Queen Street and Stockwell Street. On this our stance aligns with Cycling Scotland.

Yours sincerely,

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GoBike)

[1] Transport Scotland, “Cycling by Design”, September 2021 [Online].

[2] Greater Manchester’s Cycling and Walking Network, “CYCLOPS – Creating Protected Junctions”, July 2019 [Online].