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Ref: TF/IS

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Dear Mr Waddell,

**THE GLASGOW CITY COUNCIL,
(UNIVERSITY AVENUE AND UNIVERSITY PLACE)
(TRAFFIC REGULATION AND PARKING CONTROLS) ORDER 201_**

Thank you for your email of 09 May and the opportunity to comment on the proposals for parking controls and painted cycle lanes on University Avenue.

GoBike objects to the TRO on a number of grounds.

1. The painted cycle lanes are dangerous.

Painted cycle lanes are dangerous for people cycling on University Avenue. Research has shown that painted cycle lanes legitimise dangerous close passes of people cycling, this situation being made worse by the minimal cycle lane width adopted within the plans. Research published in the [Accident Analysis and Prevention](#) journal shows that marked on-road cycle lanes and parked cars reduce the distance that motorists provide when passing cyclists. In situations where the cyclist is in a painted cycle lane, the motorist has a clear lane ahead and does not use the safe overtaking manoeuvre that requires crossing the central reservation. As a result there is less of a conscious requirement for drivers to provide additional passing distance. Physical protection is required for people cycling, for the full length of University Avenue, on both sides of the road.

2. The design of the painted cycle lanes within the TRO makes cycling even more dangerous.

The design of the painted cycle lanes within the TRO, which disappear at bus stops, crossings, and at the tops of the hill, put people cycling in even greater danger. No provision has been made at these points for the safe continued passage of people on bikes, who will be forced into the stream of moving motorised traffic. Continuous physical protection is required for people cycling, for the full length of University Avenue, on both sides of the road.

3. Painted cycle lanes on University Avenue do not prevent waiting, loading or parking.

Painted cycle lanes will fail to address [well documented issues](#) with stopping and parking within cycle lanes on University Avenue, due to lack of resources for parking enforcement cited regularly from Glasgow City Council. This will continue to put people cycling in danger, who will be expected to weave in and out of traffic streams to avoid stopped vehicles. Segregated cycle lanes on both sides of the road would prevent illegal parking without the need for enforcement.

4. The plans are in contravention of the Transport Hierarchy.

Painted cycle lanes within a redevelopment of a road as proposed for University Avenue directly contravenes the Sustainable Travel Hierarchy ([National Transport Strategy 2016 pg 26](#))

recognised by Glasgow City Council, by failing to provide safe space within the road environment for people cycling. Within these plans, people on bikes are expected to share the carriageway with no physical protection from motor vehicles. Painted cycle lanes are proposed for only half of the road, and the 1.5m width of the cycle lane is below the 2m desirable minimum width stated within the design recommendations of [Cycling by Design](#) (pg 51). To provide a safe environment for anyone who wishes to cycle, physical protection is required for people cycling on both sides of the road along the full length of University Avenue.

5. The plans fail to recognise Climate Change Emergency status.

The TRO fails to recognise the Climate Change Emergency status declared by the University of Glasgow and recognised by Glasgow City Council, with the creation of the Climate Emergency Working Group. Glasgow City Council have refused to discourage current volumes of motor traffic to make space for protected cycling and improve air quality on the street. GoBike have shown that making the street one-way for motor vehicles would allow for protected space for cycling on both sides of the road as well as an improved pedestrian environment.

6. The plans fail to recognise the Colleges Cycling Route status of University Avenue.

The TRO fails to recognise the [Colleges Cycling Route](#) status of University Avenue by neglecting to provide safe physical protection for people cycling on both sides of the road. To provide a safe environment for anyone who wishes to cycle, physical protection is required for people cycling on both sides of the road along the full length of University Avenue. The Colleges Cycle Route was once a flagship route and is now being destroyed, rather than being upgraded.

7. The plans fail to recognise recommendations made within the Connectivity Commission Report.

The TRO fails to recognise recommendations made within the [Connectivity Commission Report](#) which mandates for 'the completion of a network of safe, high quality, segregated cycling arterial routes connecting the city centre to suburbs and peripheral neighbourhoods'. University Avenue is a direct arterial route used by people commuting into the city centre as well as by staff and students travelling to the university campus. While secondary routes through the campus may be being considered, provision for safe cycling needs to be primarily on direct routes. To uphold the report recommendations, this section requires segregation on both sides for cycling.

8. Double yellow lines with kerb marked lines are not legally compatible with mandatory cycle lanes.

The TRO stipulation 'No Waiting No Loading / Unloading', as mandated by the double yellow and kerb marked lines marked on drawing 5230-001, is not compatible with the mandatory cycle lanes also marked on the drawing. Double yellow lines allow for dropping off ('you may stop while passengers board or alight' [Highway Code Rule 238 - Road Markings](#)), which is contrary to rules for solid white line marked cycle lanes which mandate that 'you MUST NOT DRIVE' ([Highway Code Rule 140](#)). Double red lines should be used instead, which mandate 'no stopping at any time' ([Highway Code Rule 238 - Road Markings](#)).

9. The TRO drawing is inconsistent with other approved planning drawings.

The TRO drawing 5230-001 is inconsistent with approved planning drawings relating to work currently underway at the University of Glasgow's Learning and Teaching Hub site, ref 16/01467/DC. Drawing LTH-HLM-00-00-DR-A-5002 shows a disabled drop-off lay-by that has not been reflected in the TRO drawing 5230-001. This is also referenced within the Supporting Planning Statement which states that "A vehicle drop off facility will also be provided on University Avenue". Should this approved lay-by be implemented, the TRO proposals would cause safety issues whether its access traverses the bus stop, or it encourages driving across the 'do not drive' mandatory cycle lane. If the lay-by is not being implemented, the discrepancy across the drawings makes it impossible to fully assess the safety implications of the TRO and therefore we must also object on these grounds.

10. Lack of public support.

On release of this TRO proposal, GoBike set up a [petition](#) asking people to sign in support of full length segregated cycle lanes on University Avenue. In the space of three weeks this has

gathered over 700 signatures, demonstrating overwhelming public support for a rethink on the proposals for University Avenue.

Yours sincerely

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

Tricia Fort
for Consultations, GoBike