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Dear Sir/Madam,

**THE GLASGOW CITY COUNCIL, (SOUTH SIDE CAR CLUB)
ORDER 20__Stage 1 Consultation**

Thank you for your email of 03 December and the opportunity to make preliminary comments on the proposed TRO identified as the South Side Car Club Order.

We have looked at the basic and quite sparse information on the City Council Website pertaining to Car Clubs and Electric Vehicle Charging points and this raises some general questions and observations about charging points and car club spaces. We then raise some points specific to each of the six sites in this proposed TRO.

General

- We strongly support the extension of car club provision across the south side. Making it easier for more people to choose a club car for personal transport will help reduce the number of private cars both driving round and parked on the streets, tackling congestion, helping bus services become quicker and more reliable and improving the environment for cycling, all in line with national and local policy aims.
- We cannot support policies which encourages a straight substitution of conventional private cars by e-cars. This will do nothing to reduce congestion or to make the streets places for people to enjoy. We can see no justification for subsidising more affluent people (those who can afford to buy brand new cars) with interest-free loans to purchase an electric vehicle and free charging. Making each additional car trip effectively free will be counter-productive, leading to more car journeys and more congestion. We recognise, though, that these policies are set nationally and not by the council.
- We are concerned about street space being used for the storage of cars, whether they are private or car club vehicles or whether they are simply "parked" or charging. Streets are primarily for moving vehicles. We have only 12 years before it is anticipated that new petrol and diesel cars and vans will not be bought; thus we should be considering appropriate land use now. Existing or disused fuel stations should be used for charging vehicles as the first option, with on-street charging as a last resort.
- We question the subliminal message of bracketing car club parking with e-car charging points, allowing the impression that each is equally socially responsible. Perhaps this is being done to allow for a future all-electric car club fleet. But until the 'range anxiety' problem has been solved an all-electric fleet would preclude use of the cars for longer trips outside the city (e.g. to the Highlands). It seems likely that most club cars will be conventionally powered (or hybrids) for some time yet, and unlikely to need to be parked at a charging point.
- It's difficult to respond sensibly to some aspects of the proposed TRO without knowledge of policy on spread and density of either the club cars or charging points and in particular how strongly efforts are made to find off-street sites for charging points. Optimal siting of the charging points is going to depend on how long a charge takes (what type of charger is envisaged? Is full charge or top-up expected?) and whether users will be required or encouraged to move the car immediately the charging is complete.

- A presumption is needed against putting charging points on arterial routes as this would conflict with council policy to encourage active travel. It would put even more obstacles in the way of providing protected cycling infrastructure on these direct routes, an essential step to encourage more people to see cycling as the natural choice for local journeys.
- We question the policy on providing charging points in tenemented areas of the city. It seems impractical to provide enough charging capacity in these areas for mass switching to e-cars until the technology makes charging possible in a time similar to that taken to fill a fuel tank, at which time fuel stations will presumably be repurposed as charging stations.
- We are concerned about the logic of providing charging stations and club cars (effectively long term parking) on streets lined with shops. The residential density must be lower than on streets without shops, they often have other (temporary or permanent) footway obstructions and have more pedestrian traffic. Is it thought that users of the spaces will generate more business for the shops? Might the charging points generate car trips to the shopping area which would otherwise be walked? There is clear evidence that shops gain more business from people walking, cycling or travelling by bus than they do from people who travel by car. It seems counter-productive to have long-term parking places outside shops when people with mobility needs might wish to shop or deliveries have to be made.
- We wonder whether, if space permits and there are no consequences for active travel, such as the denial of two-way cycling, perpendicular parking sites, with vehicles reversed in, should be preferred for both charging points and club cars. Perpendicular parking is easier for occasional drivers in unfamiliar cars, and does not require a length of road to be marked out for the largest possible e-vehicle.

Specific proposed sites

- Paisley Road West.
 - This is a key arterial route. It must not be made more difficult to create protected cycle infrastructure here than it already is. The footway here is also busy, and more obstructions should not be created.
 - The position outside the subway station is possibly attractive for a club car site (irrelevant for a charging site, unless charge-and-ride use is envisaged), but there are plenty of alternative sites in nearby side streets, including a length nearby on Cessnock Street, customarily used for perpendicular parking.
 - How will the eventual introduction of the Ibrox event parking permit scheme be managed for the charging space?
 - An additional factor here is that the proposed site floods up to kerb level after even moderately heavy rain.
- Kenmuir Street: The proposed site is round the corner from the shop-lined Albert Drive, and directly outside a dentist. Long-term parking is inappropriate at such a location.
- Allison Street: The proposed site in this shop-lined street with busy, narrow footways seems odd given the whole Govanhill grid to choose from, including the length of perpendicular parking next to Govanhill Park. Again, as explained above, long-term parking is inappropriate on such a street.
- Torrisdale Street: This seems close to an ideal site for a car club car.
- Albert Avenue: Most of Albert Avenue is customarily used for perpendicular parking. We can see the logic in placing both car club and charging sites near corners (reducing walking distances from many directions) but in this case the perpendicular parking is not far from the corner.
- Queen Elizabeth Gardens: In this relatively new development there is perpendicular parking in the centre of the street. Using some of these spaces would eliminate the need for more street furniture obstructing the footway.

We would welcome the opportunity to discuss these points with you in more detail.

Yours sincerely



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