



Glasgow City Centre Transport Strategy 2014 -2024
Response from Environmental Protection Scotland
May 2014

Environmental Protection Scotland brings together individuals and organisation across the public, private and voluntary sectors to discuss and promote ideas, knowledge and solutions to achieve our aims of a cleaner, quieter, healthier, sustainable Scotland. We are a registered charity that informs debate, provides impartial advice and policy updates based on sound science and research in the fields of air quality, land quality and noise.

Governed by a Board of Trustees and supported by Expert Advisory Groups (EAGs) our structure enables us to take a progressive and pragmatic approach to the issues which concern us and, on behalf of our wide and extensive cross-sector membership, to promote integrated and effective policy-making which supports sensible and workable solutions to pressing environmental challenges. Our EAGs represent a wide spectrum of our members and are chaired by experts in their field and seek to build stronger alliances and support better collaboration between government, practitioners, legal experts and researchers.

Our Air Quality EAG aims to promote integrated policies and practices that reduce the negative effects of air pollution and greenhouse gases on human health and the environment. Our current focus is on particulate matter and the role of Local Air Quality Management in Scotland.

Our Land Quality EAG is action focused and aims to encourage the use, and reuse, of land ensuring that human health and the environment are protected. By providing continuity, the EAG promotes a better understanding of land quality and policy to the public and regulators.

Our Scottish Noise Advisory Group (SNAG) is focussing on developing best practice to manage neighbourhood noise, transport noise and developing a policy that will ensure that the impacts of renewable energy infrastructure are minimised e.g. domestic wind turbines and air-source heat pumps.

The comments we provide below cover all three of our core areas. Given the targeted nature of the questions, we have provided a number of general comments (Question 10) that Glasgow City Council should consider during the review process.

Response

1	What more, if anything, do you think could be added to the aims and objectives?
	The European Commission's Transport White Paper calls for a "mixed strategy involving land-use planning, pricing schemes, efficient public transport services and infrastructure for non-motorised modes and charging/refuelling of clean vehicles is needed to reduce congestion and emissions". Environmental Protection Scotland (EPS) feel that the 5 objectives only go in part in meeting this, and we note with disappointment that there is no

	<p>mention of noise or land use, two areas which affect and are affected by transport infrastructure.</p> <p>Your draft Strategy states that it is aware of low-cost private parking lots appearing in vacant land and it is known that the amount of land allocated to off-street parking can be disproportionate to the land available. An average of 30% of soil sealing occurs in areas devoted to transport¹. Whilst private land is outwith the remit of Glasgow City Council, liaising with landlords may help resolve this issue, in particular closing non-official car parks on private land. The Council should actively discourage pop-up parking and work to convert vacant land into greener spaces (albeit on a possible temporary basis), by doing this the number of private cars parking in the city centre can be reduced which will result in lower emissions at these areas as well as reducing noise to help meet the requirements of the European Noise Directive.</p> <p>At least 1 million healthy life years are lost every year in western Europe due to noise from road traffic alone and it is the second worst environmental cause of ill health after particulate matter². The European Noise Directive calls for Member States to bring about measures “intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure environmental noise”, this includes noise from transport. EPS recently responded to the Glasgow Agglomeration Draft Noise Action Plan³ and we re-iterate our view that air quality and noise can be tackled at the same time through strategic thinking at a senior management level. This would then allow clear links to be developed within departments for creating a cleaner, quieter, healthier, sustainable Glasgow.</p>
2	<p>Do you agree or disagree with the location of Avenues identifies within the Strategy?</p> <p>Agree and disagree.</p> <p>It would appear from the Avenues on p33 that the same modes of transport are being forced into a reduced number of lanes. This will not do anything to improve air quality and noise disturbance, rather it will cause an increase in congestion and therefore pollutant emissions. Also if the Council wish to encourage cycling then Avenues need to be as free from traffic as possible to make the cycle lanes safe and attractive to use.</p> <p>The concept of Avenues is a worthy one provided that their aim is to reduce traffic emissions and noise nuisance by:</p> <ul style="list-style-type: none"> • discouraging private car movement, • increase cycling, • only being used by low emission buses

¹ European Environment Agency (2013) “A closer look at urban transport. TERM 2013: transportation indicators tracking progress towards environmental targets in Europe”

² World Health Organisation (2011) “Burden of disease from environmental noise. Quantification of healthy life years lost in Europe”

³ Available at www.ep-scotland.org.uk/wp-content/uploads/2014/01/EPS-Glasgow-NAP-consultation-response-Dec-2013.pdf

	<ul style="list-style-type: none"> being linked to existing public transport hubs e.g. Central Station, Queen Street Station and Buchanan Bus Station. <p>The proposed Avenues only do this in part and EPS would like to see them linked to each other more effectively in particular:</p> <ul style="list-style-type: none"> Gordon Street (in front of Central Station) linked to the West Nile Street Avenue Candleriggs linked to the George Street Avenue <p>It is our opinion that Avenues should only be used by pedestrians, cyclists and low emission buses and low emission taxis. There should be no private cars.</p>
3	Overall do you agree or disagree with the proposed locations of the new cycle routes?
	Agree.
4	Do you agree or disagree with the segregation of cycle routes, where possible?
	<p>Agree.</p> <p>To encourage an uptake in cycling, cycle lanes need to be clearly segregated from vehicles throughout the entire network. This could be achieved by colour coding the entire network and suitable barrier, e.g. pavement, between the lane and the road. We would also expect Glasgow City Council to ensure that cycle lanes are properly maintained and are kept as far as reasonably practicable pothole free to make them attractive to users ensuring continued use.</p>
5	What more, if anything, could be done to further encourage people to cycle in the city centre?
	<p>Further to our comments in Q2 re cycling and Avenues, there needs to be improved interchange between modes of transport, cycle access and cycle parking as well as an education and advertising campaign to promote the new cycle routes.</p> <p>Modal shifts in transport use requires time and the infrastructure to be in place before it used to any measurable degree, Environmental Protection Scotland calls on cross-party support and leadership from the Elected Members at Glasgow City Council to fund the infrastructure and awareness raising to encourage the uptake of cycling.</p>
6	Overall, do you agree or disagree with the proposals for bus improvements?
	Disagree
7	Please tell us what you like and dislike about the proposals?
	<p>EPS agree that something must be done to tackle the increasing public transport congestion around Glasgow Central, i.e Hope St., Union St., Renfield St. and Argyle St., and creating hubs does not address this and nor does it improve air quality and noise disturbance.</p> <p>The main concern is the emissions from diesel buses which are contributing to poor air quality in the city centre – diesel engines are well known to emit more PM₁₀ and NO_x per kilometre than petrol equivalent. With Glasgow City Centre an Air Quality Management Area (AQMA) and with Glasgow named in the European Commission’s legal action against the UK for infringements of the EC limit value for NO₂, more stringent action must be taken.</p>

	<p>EPS appreciate that the bus operators in Glasgow are private companies and therefore Glasgow City Council is limited in what can be done. That said, we want political leadership and consensus from all Elected Members to encourage bus owners to retrofit buses to meet the most current Euro Standards and make use of Transport Scotland’s Green Bus Fund to purchase low emission vehicles.</p> <p>It is our view that Glasgow City Council should enforce a system whereby only low emission buses enter the city centre; this includes the new Fastlink service. Buses that are not low emission should be stopped at the perimeter.</p> <p>EPS also note that there is no mention of whether the buses to be used on the FastLink service will be low emission buses and we seek reassurance that they are.</p>
8	<p>Four potential options have been proposed for Argyle Street. Please use the space provided to tell us what you like and dislike about each of the options:</p> <p>There should be no removal of pedestrianised areas. This contradicts your own City Centre Transport Hierarchy (page 32): 1. Pedestrians 2. Public Transport.</p> <p>The only option that doesn’t do that is Option 4. If this option were to proceed then it should be tied in with the use of low emission buses and improved signage for pedestrians to get to the main shopping area. Option 4 should only be used if Glasgow City Council enforce a strict low emission bus policy.</p>
9	<p>Please consider proposals for Traffic Management in the city centre and provide any comments you may have.</p> <p>EPS support the introduction of a 20mph speed limit as this reduces traffic emissions (in free flowing traffic) and noise.</p> <p>EPS expect that the buses used for the FastLink service are low emission vehicles.</p> <p>EPS want only low emission buses in the city centre. Until that is possible we would expect that Glasgow City Council ensure priority phasing at traffic lights for buses in order to reduce congestion and the associated air quality pollutant emissions from the start-stop movement.</p> <p>EPS agree that parking in the periphery of the city centre should be encouraged however we would prefer to see that the Park and Ride facilities, e.g. Bridge Street underground, are utilised to their maximum capacity. These facilities need to be better advertised through signposting, be attractive to commuters and shoppers through fast, reliable public transport links and be established at all the main entrances to the city, e.g. next to the M8, M77 and M74.</p>
10	<p>General comments.</p> <p>Local Authorities are required to act to facilitate cleaner urban transport options and there are proposals to commend in this draft Transportation Strategy, for example developing pedestrian friendly Avenues, the creation of a city wide cycle network and the introduction of a 20mph speed limit. These measures, provided they are carried out with cross party political consensus and support, will go some way in making Glasgow City Centre a more</p>

attractive place where citizens, commuters and shoppers can leave their car behind and walk or use public transport. These proposals however cannot act alone or in unison.

What the draft Strategy fails to deliver is how it will:

1. Help meet emissions reduction targets and current air quality objectives and limit values.
2. Reduce the harmful effects of noise on residents
3. Minimise the land take associated with pop-up car parks on land that could be used to create green spaces in the city centre.
4. Encourage people to use Park and Ride facilities.
5. Discourage people traveling in cars from entering the city centre.

EPS also note that there is no discussion within the draft Strategy of emissions from taxis and private hire vehicles (PHVs). These are not sustainable forms of transport and as the majority are diesel engines contribute to the poor air quality in the city centre. EPS call on Glasgow City Council to ban taxis and PHVs from using bus lanes unless they are low emission vehicles.

The European Commission has a target of CO₂ free city logistics in major urban centres by 2030. Given that the draft Strategy exists until 2024 it is disappointing that there is no mention of how Glasgow City Council intends to achieve this. Environmental Protection Scotland would encourage delivery restrictions to minimise congestion during the day e.g. either early morning 6am – 7am or evening 8pm – 9pm. Clearly a balance would need to be sought between economic targets and potential noise nuisance of citizens.

EPS also recommends that Glasgow City Council actively encourage eco-driver training for delivery drivers which not only reduce emissions but has been shown to give fuel savings of 5 – 20%⁴ making it cost effective for the delivery companies.

The draft Strategy also fails to discuss ways in which the redevelopment of Queen Street Station could be used as part of an integrated transport network. Indeed, looking at both the Network Rail proposals and this draft Strategy it appears that the Buchanan Galleries multi-storey car park is being re-sited within the existing train station boundary. EPS would encourage strong dialogue and cooperation between Network Rail, Transport Scotland and Glasgow City Council so that commuters can be provided with an integrated transport hub / taxi facilities in the redevelopment discussions.

The creation of a low emission zone should be reconsidered to force the uptake of greener buses, taxis and freight delivery vehicles. With the Scottish Government pushing forward with their low emission strategy in 2014 with likely publication next year, Glasgow City Council should take action now.

⁴ European Environment Agency (2013) "A closer look at urban transport. TERM 2013: transportation indicators tracking progress towards environmental targets in Europe"

Respondent Information

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We are responding as an organisation.

We are content that our response shall be made available to the public through the Glasgow City Council website.

We are content that Glasgow City Council can contact us in future in relation to this consultation.