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Glasgow City Council comments on SPT Draft Regional Active Travel Strategy Document:

Overall comments

Although a very small window of opportunity to comment was made available, compounded by the workshops being held late in the engagement process, GCC has endeavoured to provide constructive commentary.

GCC values its strong working relationship with SPT as demonstrated through our collaboration on many workstreams. With the recent Verity House agreement changes resulting in more direct funding to local authorities, further clarity is needed on the role to be played by SPT in the delivery of active travel infrastructure.

The Regional ATS is a relatively high-level document and as such does not provide clear insight on how its delivery will be taken forward. The document needs to clearly take cognisance of local established, committed delivery plans. GCC also questions the inclusion of design guidance and feels this is unnecessary.

Illustrative images used in the draft Regional ATS

GCC is concerned that some of the illustrative images used within the ATS document appear to show a person cycling in the wrong direction along a 'with-flow' cycle lane (e.g., p79). This is disappointing as it undermines the considerable resources the Council (and other partner Services) have invested in behaviour change and information campaigns to educate and encourage 'good behaviour' by people cycling.

Section 2 – About the Regional Active Travel Strategy

2.1 Overview (p10)

Whilst the focus on regional active travel routes is welcome, the document gives no account of how this aligns with the importance to increase active travel for local journeys: "*Active travel is the most reliable, efficient and healthy way to travel short distances for everyday journeys*".

Section 4 - Active Travel in Strathclyde Today

4.4 Summary (p20)

The text notes that "*Addressing the gaps in the network and providing integrated and consistent infrastructure will be key to better connecting local authorities and supporting local and cross-boundary trips in the region*".

GCC notes there is an opportunity for SPT to lead a strategic approach to addressing the gaps between the various active travel networks (including NCN and Core Path) and creating linkages between public transport nodes and the active travel network.

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Section 6 - The Policy Response

The ATS document should include embedded links to the policies under discussion within the text in this section.

Section 8 – Delivering the Vision

8.1 Overview (p33)

GCC is supportive of many of the actions outlined within the Delivery section but overall, it is not clear how SPT will deliver on these and the resulting impact on local authorities and funding streams.

8.2 Delivery Plan Framework (p33 onwards)

(8.2 / 1) Creating an Attractive Environment for Walking, Wheeling and Cycling (p34)

GCC is committed to integrating the measures noted within this section into its active travel infrastructure, for example through the ongoing work of the council's Liveable Neighbourhoods programme, and as described within the Interim Delivery Plan for the City Network.

Ensure all Active Travel Routes are well maintained (Policy 1g, p35)

GCC seeks to design infrastructure with consideration for reducing the lifetime maintenance costs.

(8.2 / 2) Integrating Active Travel with Public Transport and Freight Movements (p36)

GCC is supportive of improved integration of active travel with public transport and for increased levels of use of low carbon transport within freight movements.

(8.2 / 3) Increasing Affordable Access to Bikes (p38)

Extension of Bike Hire Schemes (Policy 3a, p38 and Case Study, p20)

GCC recognises the importance of improving access to cycles as a supportive measure to increase rates of active travel.

Please note that GCC has previously made comments to SPT regarding the Nextbike share bike scheme in Glasgow, however the draft ATS includes the following text: "*The scheme is led by Glasgow City Council, and it is understood that contractual restrictions need to be investigated to enable expansion of this specific scheme across the region. This is addressed in the Regional ATS Delivery Plan*".

This text is factually incorrect as GCC's current contract and future contract is restricted to bike stations in Glasgow.

Discussions have previously taken place with neighbouring local authorities regarding this; neighbouring authorities would need to tender for a supplier and a maintenance contract and ensure that they had the same supplier as Glasgow. After this GCC would need to enter into discussions regarding amendments to our contract that would allow bikes to be left at cross boundary locations and taken to

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their parent authorities. This would likely have cost implications for GCC. Given the inherent complications in this, we do not support it without access to additional funding support.

Extension of Bike Subscription Services (Policy 3b, p38)

GCC recognises that some cycle subscription services may help to remove barriers to accessing a cycle for many people. For example, the inclusion of a maintenance contract within the subscription fee can help in delivering a flexible solution to cycle ownership. Some subscription schemes may improve the affordability of a cycle for some individuals; however, it should be recognised that some current schemes incur a significant monthly cost. Subscription schemes may also positively contribute to the circular economy.

It is noted that the strategy document lacks any definition of the types of subscription services proposed within this context. For instance, does subscription in this instance refer to a cycle for sole use or to a bike share scheme – or both? Although the inclusion of Third Sector Delivery Partners and Community Groups as key stakeholders implies the ATS is supportive of schemes that would reduce financial barriers to accessing a cycle, an opportunity is missed to further describe this. Would a regional oversight enable subscription services to operate in a similar way to concessionary bus fares?

(8.2 / 4) Promotion, Travel Behaviour Change and Information (4, p39) (introductory text)

GCC agrees that Behaviour Change measures are essential in contributing to increasing rates of active travel and we are therefore supportive of this being included within the strategy document. GCC has itself developed a Travel Behaviour Change Strategy to support the Glasgow Transport Strategy (GTS) and Active Travel Strategy (ATS).

Funding structures for Behaviour Change related activities have undergone significant changes in recent months. The draft ATS creates some certainty that funding streams will remain in place for local authorities to deliver such interventions.

Support Provision of Active Travel Officers (Policy 4c, p39)

Glasgow City Council welcomes opportunities for collaboration with other local authorities; the Glasgow Transport Strategy is a functional policy document providing a transparent statement of direction. Within this context the council will determine the functionality of officer roles in helping to achieve its goals.

(8.2 / 5) Governance and Funding (p41)

The wording here is ambiguous particularly in light of recent changes to Scottish Government funding streams to local authorities for active travel and behaviour change interventions. More clarity is required here so that local authorities may better understand the potential impact and SPT's role and authority within this remit.

8.3 Regional Active Travel Network (p42 onwards)

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8.3.3. The Final Network

It is noted that SPT has accommodated comments from earlier engagement with GCC regarding the network development within GCC boundaries, as the overall map now appears to match our published proposed network, albeit an incomplete version. By not showing the complete proposed network, it infers SPT has prioritised Glasgow's City Network. **GCC does not support any prioritisation of GCC's City Network within the regional ATS.**

A fundamental issue is that the GCC City Network is shown as committed, with the green lines as proposed. The concept of the City Network has been approved through committee, but these routes are still proposed and can change pending feasibility and design.

We note that the majority of routes flagged as Priority are out with the GCC boundary. However, many of them are immediate connectors to Glasgow from identified Primary and Secondary Localities within the region. Wards are used in the city as the Localities, some as Secondary and some as Primary. Wards cannot be used as Localities as some have more than one key local node.

Localities used should be from the publicly available GIS data for the Glasgow City Development Plan Network of Centres showing Major Town Centres, Local Town Centres, Other Retail and Commercial Centres and Local Shopping Facilities. These are more applicable to local nodes, e.g., the locality marker for Dennistoun is shown as being atop the industrial area of Blochairn whereas the dense neighbourhood of Dennistoun is south of the motorway. This locality is also noted as secondary where Dennistoun could be seen as a Primary.

The discussion at the SPT Regional Active Travel Network Workshop held on Tuesday 27th August identified that as part of the development of the network, existing infrastructure including off-road routes were utilised in the primary network. This is contrary to the approved GCC policy and has skewed the routes identified as a priority between Glasgow and neighbouring local authorities.

For example, the Great Western Road (A82) is not identified as having any level of priority as part of the RATN between Duntreath Avenue in Glasgow and the junction with the A810 at Duntocher. Within Glasgow it is identified as a proposed route up to Duntreath Avenue. To the west of this there is no mention of it on the map. This is a key route connecting Glasgow with West Dunbartonshire, and yet the identified priority is that of an off-road footpath that goes to the north of Drumchapel via Garscadden Woods and Cleddans Burn to join a farm track in West Dunbartonshire.

Section 9 - Infrastructure Delivery Plan

9.2 Route Prioritisation (p48)

The ATS text states that: "*decision makers can make informed choices about where to allocate resources and implement changes.*" It is not clear whether there will be an expectation that LAs prioritise for first delivery those routes identified as Priority within the RATS Network. GCC has a committed network and delivery plan and

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consider that SPT do not have any authority over this delivery as it remains with the local roads authority.

9.4 Funding (p69)

In regard to the following: *“The funding landscape will constantly change throughout the lifespan of the Regional ATS. Consequently, SPT will work with relative stakeholders to explore viable funding opportunities to develop and implement the Regional ATS Delivery Plan and the actions it identifies on a year-by-year basis.”*

GCC would ask SPT to support local authorities in continuing to lobby Transport Scotland for multi-year funding as this is crucial for infrastructure delivery.

Section 10 - Regional Design Standards

The standards proposed by SPT within this section summarise existing guidance and standards and is therefore unnecessary. The required consistency in delivery across the region can be achieved by all local authorities following Cycling by Design guidance. **GCC therefore does not support the inclusion of design standards or guidance within the Regional ATS.**

10.4 Route Types (p75)

10.4.1 Primary Routes (p75)

GCC notes that the High LOS design criteria for Primary Routes (the main direct links between main origin and destination locations) contains key elements also identified by GCC for its City Network. However, a key difference is that GCC commits to the City Network being delivered on-road and does not recognise recreational routes as being part of the core network, as detailed within the published City Network Final Delivery Plan.

10.6 Cross-boundary working (p78)

GCC in general welcomes the cross-boundary approach set out within the draft document. However, GCC has a committed prioritised approach to deliver its City Network, including taking routes to neighbouring boundaries. Discussions with the relevant local authorities will continue as appropriate as this delivery advances. GCC would welcome a much clearer recognition of this within the Regional ATS document.