

Glasgow City Council / Glasgow Life  
PO Box 15175, Glasgow, G4 9LP

Saturday, 4th July 2020

Dear Sir or Madam,

**Re. Planning application 20/01352/FUL**

I am writing to record my **objection** to the proposal, in its current form, for the Active Travel Management Plan in Pollok Country Park.

Whilst I support - in principle - the stated objectives and many of the elements of the project to reduce the presence of cars within the centre of Pollok Country Park, and to prioritise active travel. Its core proposal to remove traffic from the core of the park is excellent.

However it has **significant shortcomings** in the high-level response to the challenge in the project framing. It is missing key detail with regards its impact on local residents and active travel users in the immediate vicinity. The traffic analysis in particular takes an insufficiently wide scope, and does not explore relevant options or considerations.

The plan therefore requires **detailed reconsideration**, with additional mitigations or rework, **and also to take into account Coronavirus mitigations currently being put in place in the affected vicinity (Haggs Road), references below.**

## Local resident impact; Traffic assessment is insufficient

The Shawmoss/Haggs junction is poorly considered, with **inadequate modelling of the wider contexts:**

- The proposed no-right turn into Shawmoss Road (7.2.14, "Right from Haggs Road south to Shawmoss Road", see also figure 7.3) *significantly disregards the needs and impacts on residents in the Shawmoss, Herries Road, Crossmyloof vicinity.*
- It risks causing car traffic to ignore road instructions; or to bypass the junction and cut against the current one-way in Herries Road; *substantially increase traffic on minor road Whins Road;* or an extensive diversion via St Andrews Drive+Herries Road, or via Crossmyloof.
  - **These all pose a risk and impact on various groups of local residents which outweighs the minor impact of allowing right-hand turns into Shawmoss.**
- It will increase already problematic rat-running in Waverley Park, Ravenswood Drive in particular.

**None of this has been considered in the traffic assessment or modelling**, which must put the justification for many of the detailed measures into serious question.

## Retention of Burrell car park for general parking

The proposed retention of the Burrell carpark for 154 spaces (109 of which are proposed as for general use, cf. Traffic Analysis Table 5.1) is poorly framed, and **entirely counter to the stated aims to “direct vehicular traffic away from the centre of the park”**, and the support of active travel. This car park should, at most, be blue badge/coach/access use only (ie. 45 spaces of proposed)

This **specific decision** to retain the Burrell car park at this scale then effectively self-justifies the need for the creation of an **unnecessary road to be built**, which will permanently alter the greenspace of the park to the long-term detriment of the park, park users and the people of Glasgow.

**Reasonable alternatives (passing places to support the much lower-volumes of traffic a smaller car park would entail) have not been considered in sufficient detail, in the plans/documents as presented.**

The size calculations for car space allocation are misleadingly presented throughout. **The increase in Managed Standard allocated space change raises the ‘Managed Standard Spaces’ by 66%** (Transport assessment Table 5.1, from 302 to 502). This is in direct contradiction to the stated aims of the project, and the need to support modal shift.

## Specific points in plan, as presented

The specific details of the plan, as presented, I would wish to draw your attention to:

- Hags Road, **at the time of writing**, has road works to reallocate space to pedestrians and cyclists, that **must now be taken into account by this project**. Ref. Scottish Road Works Commissioner, ref CG003-S000000006150, Shawmoss Road to Hags Gate, *“Carriageway repairs in order to reallocate road space for cyclists and pedestrians - essential to the management of covid-19 and to mitigate its spread”*.
  - **Failure to take this into account risks undoing important mitigations.**
- With regards the **Shawmoss/Hags junction**, as proposed, fails to address the needs of active travel and observed traffic behaviours:
  - **Plan should add cycling indicators at all Shawmoss/Hags Road non-car phasing.**
    - Currently 7.2.14 talks only of **Pedestrian** crossing infrastructure and phasing
  - Plan could also consider allowing cyclist exemption to enter park from Shawmoss
  - Plan has flawed phasing of this crossing (Transport Assessment Figure 7.2).
    - Cars currently *regularly* jump the lights from Shawmoss Road, at end of phase 3 (as a result of long line-of-sight of traffic sequence).
    - **This is a danger to pedestrians.**
    - Plans should move the pedestrian phase to last.
  - Plan should add extensive **double-yellow lines on Hags Road (particularly west side) and Shawmoss Road** in vicinity of pedestrian crossings, with pavement parking restrictions.
  - Traffic modelling or assessment does not reflect the **endemic** light-jumping at this junction.
    - **Plan should propose or support red-light cameras**, with a consideration too for penalising traversal from Shawmoss directly into the park.

- With regards the **vicinity of Haggs/Herries Roads, and Nether Pollok** (pavilion and current football parking area)
  - Please **require implementation of the following noted Transport Assessment Mitigations:**
    - **8.1.8:** Herries Road should include a cycling contraflow
    - **8.1.9:** Extend hatching at Haggs/Herries Road across the road, to allow safer entrance by cyclists turning in from Haggs South.
    - **8.1.10:** TROs to prevent on-street and pavement parking on Haggs, Shawmoss, Herries
    - **8.1.11:** Create shared use pavement on the east-side of Haggs Road, matching west side
  - Further request that **Herries Road should restrict all exit to Haggs Road** (Become no-through road)
    - **Traffic seeking to access the park will travel through this junction**, ie. seeking a more direct route into park from Shawmoss, avoiding the detour around Netherauldhouse roundabout.
    - This impacts on, and poses a risk to local residents, cyclists.
    - Refuse lorries - sometimes cited as a key reason for not closing exits - already regularly exit via Shawmoss, having turned in the private backroad between Haggs and Herries Road.
  - **Nether Pollok entrance status/anticipated use is unclear**
    - Traffic assessment (5.10.6) suggests “*Nether Pollok (sic) Playing Fields access to the south [of the main entrance] will become an access only*”. There is, on face value, an inferred assumption this is an optional entrance.
    - The status/type of the Nether Pollok (Pavilion entrance) G1 “Manual swing arm barriers” (Site plan as Proposed, schematic, greyed G1 indicator) is **unclear in detail**.
    - **Request the plan confirms default of closed, restricted access arrangements, mandated key/pass holders, or closure to all traffic (access via Shawmoss/Haggs entrance).**
    - **Ensure G1 gate is passable by wide/3-wheeled cycles.**
    - If defaults to open, significant risk of inappropriate access by cars, to main Nether Pollok carpark if not adequately enforced/protected.
  - **Consideration should be given to introducing resident parking permits, for Haggs, Shawmoss, Herries Roads**
  - There is increased on-street visitor parking in the current coronavirus situation with the enforced no-parking in Pollok park
    - This behaviour is likely to continue/increase as evasion of parking charges, and **negatively impact local residents**
- With regards the **park interior**
  - **The proposed new Nether Pollok car park is not in keeping with a country park**
    - A large expanse of tarmac is to be built, with no design consideration for natural elements, eg. trees, shrubs, grass.
  - **There is no detail on speed hump buildout.**
    - Please ensure support for Transport Assessment note 5.3.3 **ensure cyclist bypass**
    - Please give consideration for other park users (eg. runners), where poorly designed/coloured/located speed bumps present a significant trip hazard.
  - **The Burrell car park should be blue-badge use only**
    - As per the earlier objection.

- Alternatively consider higher parking charges/car park full indicator, certainly at peak hours to reduce traffic within the interior of the park.
  - **There is insufficient cycle parking provision in the proposal.**
    - Bike parking provision is entirely inadequate at peak times (eg. Saturday morning at parkrun, the existing stands are *significantly* inadequate; Doubling it likely to be insufficient - should be at least 30 stands).
- **Public toilets provision/access is unclear**
  - Consultations indicated consideration may be given to provision of public toilets via Nether Pollok pavilion. No further detail has been provided on this matter.
- **Ecological report**
  - There is no response in the provided documents to the Ecological report (page 22, para 4.2.) regarding production of management plan to tackle non-native invasive species (eg. Japanese knotweed, Giant Hogweed) present in the park.

In closing I'd state the Coronavirus pandemic highlights the urgent need to reshape our transport and road space in support of more space for active modes of travel, indeed to actively de-prioritise the car in relative terms. This plan does not reflect public appetite, or even Government/Council priorities. The included **visitor estimates must now be considered *significantly uncertain with regards tourism, and social distancing requirements/implications.***

Indeed, consultation discussions suggested one of the key reasons for the change of entrance away from Pollokshaws Road, to Haggs/Shawmoss was driven by the need for double-decker access for tourist routes. **This analysis, and therefore its conclusions, are undermined by the Coronavirus pandemic.** In short, why cater for tourists/visitors that may no be confidently expected to arrive in the numbers the study *thought* might arrive?

It is clear Pollok park has been significantly improved in the pandemic as a result of the substantive removal of car traffic, and parking, from the interior of the park. Whilst it has had a knock-on effect locally the proposals, as made, should be **revisited with a more radical interpretation** of the goals, and a reworking of key assumptions

Measures could include **reducing car parking capacity** through dropping the Nether Pollok car park/restructured entrance, and a focus on **small, localised expansion of capacity in the existing Burrell car park** vicinity, or revisiting access provision options through a more radical consideration of existing road avenues, eg. widening. This could support protected active travel lanes for a short distance, but otherwise retaining the one-way system in the east part of the park (exiting from Haggs).

Ultimately, the timing of these proposals is unfortunate in relation to the pandemic, but it would be prudent to **pause and reflect** to ensure a once-in-a-lifetime opportunity to reshape Pollok Park for future generations, does not leave a lasting legacy that future generations will question.

With thanks for your time,

Regards,

Richard Leyton