

Objection to the proposed Celtic Park and Emirates Arena (Event Day Emergency Routes and Parking Zone) Order 201_ ("**the Proposals**") by Celtic plc, the owner and operator of Celtic Football Club, ("**Celtic FC**") whose main place of business is at Celtic Park, Glasgow ("**the Stadium**").

Background to Objection

Celtic FC is proud of its roots in the east end of Glasgow and is committed to the continued development and success of the City of Glasgow in general and the east end in particular.

Founded in the east end in 1888, Celtic FC moved to the current location of the Stadium in 1892 and has been located there ever since. Celtic FC has continually invested in the Stadium and its environs, more recently completing a modern stadium in 1998 (with ongoing investment to maintain and improve the Stadium) and making a significant investment in 2014 to assemble land around the Stadium and to complete improvements to the land and environment around the Stadium so as to create a stadium and public realm that is an asset to the local area and to the City, recognised by the hosting of the Opening Ceremony of the Glasgow 2014 Commonwealth Games and the many visitors and tourists (from Glasgow, Scotland and beyond) who visit outwith match days at the Stadium.

During the previous 125 years, Celtic FC has actively sought to be a good neighbour and part of the community, seeking to engage with the local community and community groups, as well as contributing to the economic development of the community as a substantial employer (with roughly 320 non-match day staff and around a further 700 Celtic FC managed match day specific staff engaged in and around the Stadium), partner with local businesses and contractors, contributor of local and national rates and taxes and destination for supporters, tourists and other visitors who themselves contribute substantially to the local economy both on match day and non-match day (with an average of well over 1,000,000 supporter visits to the Stadium for Celtic home matches over each of the past five seasons – over 1,345,000 during season 2017/18 alone, predominantly from our 52,000 strong base of season ticket holders – and over 30,000 non-match attendees for stadium tours alone, leaving aside other non-match day events and functions). Not including the away supporters at every match at the Stadium, many Celtic FC supporters regularly travel to matches from outwith Glasgow, the Central Belt and Scotland – around 47% of our season ticket holders from last season live in post codes outwith Greater Glasgow, with substantial numbers based across Scotland, Ireland, England and Wales giving a broad geographical spread and bringing people to the City and the east end. In terms of the age range of Celtic FC supporters attending the Stadium last year, around 20% (or 10,400) of season ticket holders fell into the under 13 and over 65 categories, highlighting the diverse characteristics and range of needs/accessibility requirements.

Celtic FC and Celtic supporters have a substantial economic, social and cultural impact on the east end, Glasgow and beyond, including the work of Celtic FC Foundation in the local area. Celtic FC is in the process of undertaking a comprehensive economic impact assessment to demonstrate the tangible financial benefits to the city and country. Celtic FC believes that it is important to fully consider this economic impact and the risk that the Proposals pose in terms of diminishing that impact, potentially irreversibly.

Celtic FC recognises that there are local concerns regarding the volume of vehicles and parking on match days at the Stadium, particularly since the recent redevelopment of residential property in the area around the Stadium. Celtic FC is happy to seek to address these concerns with interested parties, for example through consideration of the use of stewarding and cleaning operations with the consent of the local community or further communication and collaboration with Celtic supporters and the local community. It is however important to point out that many of the concerns raised have been created or at least exacerbated by the building and development works undertaken in recent years and ongoing in many areas in or around the proposed Event Day Parking Zone ("**EDPZ**"). Having been

present in the same location for over 125 years, it seems unreasonable and disproportionate to proceed with the EDPZ to the detriment of Celtic FC and its supporters, without first evaluating, considering and mitigating any such negative impact.

Celtic FC consulted widely with its supporters regarding the Proposals and public transport links generally at the Stadium. Celtic FC's Supporter Liaison Officer amongst others met and spoke with many individuals and groups, reviewed social media discussions and the topics were discussed at several meetings of the Celtic FC Fans Forum.

Key themes of the responses from Celtic FC supporters may be summarised as follows:

Public Transport

Bus:

- The nearest bus routes to the Stadium are the 61, 62, 64, 225 and 240 although the closest, relevant bus stop to the Stadium is around 0.7 miles (roughly 15 minute walk);
- Average journey time is around 30 minutes from Glasgow City Centre, although this is longer on match days;
- Capacity on match days is not increased, meaning that the services run at full capacity on match days;
- Following matches, many buses passing the Stadium are either at full capacity or do not stop near the Stadium; and
- Even where buses are available to access the Stadium before the match, buses were often not available after the match, particularly for evening matches at the Stadium.

Train:

- The nearest train stations to the Stadium are on two lines from Glasgow City Centre: Dalmarnock (around 0.7 miles, roughly 15 minute walk) and Bridgeton (around 0.8 miles, roughly 17 minute walk); and Duke Street (around 0.9 miles, roughly 19 minute walk) and Bellgrove (around 1.2 miles, roughly 24 minute walk);
- The services run at either full or near to full capacity on match days, meaning that, although there are 4 stations, the capacity is limited by the carriages available on the two lines (by way of example, Scotrail confirmed to a supporter that the capacity of Dalmarnock Station is only around 900 people per hour);
- The queuing system in place at stations can limit ability to access trains where there may be capacity; and
- Even where trains were available to access the Stadium before the match, trains were often not available after the match, particularly for evening matches at the Stadium.

In summary, the responses to the consultation suggested that the existing public transport services had no further capacity to accept any further supporters on match days.

It is noted that Glasgow City Council has confirmed to Celtic FC in a letter dated 11 October 2017 that bus operators have stated at this stage that no real improvement can be made to existing services and that Scotrail have confirmed that they already provide the maximum number of carriages for each game.

The Proposals

Health and mobility issues: Given the capacity of the Stadium and number of season ticket holders (especially the roughly 10% of over 65's season ticket holders), there is a considerable number of supporters who regularly attend with health and mobility issues, which prevent them from walking any great distance. The reasons for these mobility issues vary and many such supporters indicated

that they are not registered as disabled and do not possess a disabled parking permit. Similarly, supporters with children also indicated that a lengthy walk would present challenges for them (as a starting point, many of the 10% of under 13's season ticket holders may fall within this category). This means that in many cases such supporters travel to the Stadium by car and park as close to the Stadium as possible to minimise the distance they have to walk. Many supporters indicated that the need to walk to and from existing public transport links would mean that they would not be able to attend matches.

Travel by Bus: Given that the closest, relevant bus stop is around 0.7 miles or a 15 minute walk from the Stadium, this would impact on supporters with mobility issues and supporters with younger children, who have indicated that they would not be able to walk that distance to utilise the service. Further, the fact that the services are running at or beyond capacity (particularly after the match) means that additional demand would not be absorbed by the bus service and capacity.

Travel by Train: Given that the closest train station is around 0.7 miles or a 15 minute walk from the Stadium, this would again impact on supporters with mobility issues and supporters with younger children, who have indicated that they would not be able to walk that distance to utilise the service. Further, the fact that the services are currently running at or beyond capacity (particularly after the match) means that additional demand could not be absorbed by the train service without an increase in the service and capacity.

Drop off and pick up near the Stadium by vehicles (including taxis, private cars or shuttle buses): Many supporters (including those with health and mobility issues) who do not travel by car to park near the Stadium or use public transport utilise other vehicles to take them from their home or other locations such as the city centre to and from matches, dropping off near the Stadium, including London Road, the Clyde Gateway, Springfield Road, Janefield Street, Dalriada Street and Dunn Street. If it was not possible for such vehicles to stop to unload and load supporters near the Stadium, this would prevent such supporters from attending the Stadium for matches.

Midweek Matches: Celtic FC hosts a number of matches in midweek at 7.45pm or later, including matches in European competitions which are very often full to capacity. These matches are often played in the autumn and winter months meaning that supporters are arriving and leaving in the dark, well after 10pm in many instances. In these cases, public transport services are often not an option for supporters, particularly those who do not reside near Glasgow. As noted above and leaving aside the often far travelled away fans, Celtic FC draws support from all across the country and beyond. In many cases, fans who live in outlying or rural areas or indeed other cities such as Edinburgh, Perth, Dundee or Aberdeen are likely to require a connection to an onward train or bus. Supporters have raised concerns that, following midweek matches, even if they are able to utilise public transport to leave the Stadium, onward connecting services would have terminated by the time they would be able to get to their connecting station thus rendering it impossible to get home after the match relying on public transport.

Loss of amenity for Celtic FC supporters: The Stadium has for many years and generations been a gathering point for friends and family to meet, socialise and enjoy the football. Many supporters who would have difficulty attending the Stadium if the Proposals were implemented without first identifying and implementing alternatives, in particular older supporters, have expressed concern that they will be prevented from enjoying this amenity due to their inability to manage the distance between parking spaces outwith the EDPZ, public transport stops/stations and/or drop off locations for the Stadium. Without first providing viable alternatives the proposed parking restrictions if implemented will mean that some Celtic FC supporters will no longer be able to come to matches at the Stadium, including supporters who have been attending matches for over 30 years and in some

cases over 70 years, contributing to the economy and the City during that time. These supporters will be severely disadvantaged by the Proposals if they are implemented.

Objection to the Proposals

Having carefully reviewed the Proposals and having consulted widely with Celtic supporters, Celtic FC strongly objects to the Proposals on the grounds set out below.

Celtic FC considers that for Glasgow City Council to introduce and implement the Proposals before addressing the key underlying issue - that of a lack of alternative effective methods of transport to and from the Stadium before and after matches - is premature. That is particularly so, given that the Stadium has been in the same location for over 125 years and that recent developments have exacerbated any issues. Seeking to dissuade travel by private car with a measure which does not propose or enable alternative means of travel seems unfair and unreasonable to Celtic FC and Celtic supporters and does not address the underlying issue of poor public transport links. In the absence of effective public transport links with capacity that reflects the varying timing of matches at the Stadium (in particular those in the evening), the effect of the Proposals is to dissuade travel to the Stadium at all (and therefore attendance at matches), rather than to dissuade travel by private car.

Although it is noted that there are similar schemes in operation at Hampden Park and Scotstoun, it is respectfully suggested that the higher regularity of use of the Stadium, the higher capacity (in particular when there are events at both the Stadium and the Emirates Arena) and the divergence in public transport availability (in particular as between the Stadium and Hampden Park) distinguish the Stadium from those event venues.

Grounds for Objection

- The effect of the Proposals would be to prevent Celtic FC supporters from attending matches at the Stadium and make it materially more difficult for many other Celtic FC supporters to attend matches at the Stadium.

The high level objective of the Proposals cannot be met before proper consideration is given to the position of the individuals attending the events at the Stadium, the availability of alternative means of transport and whether those would be accessible for the individuals affected

The high-level objective of the Proposals is "*To promote healthy and environmentally sustainable methods of transport that minimise harmful emissions and energy consumption including those that involve physical activity.*" It is suggested that the policy to deliver the objective can be achieved by dissuading travel by private car when visiting stadia and event spaces in Glasgow.

There is however no suggestion that the Council in setting the objective, policy and actions have considered the timing of matches at the Stadium (in particular those in the evening), the position of the individuals attending the events at the Stadium, the availability of alternative means of transport and whether those would be accessible for the individuals affected.

The Proposals would affect many Celtic FC supporters, supporters of other teams playing at the Stadium and other attendees for other events being held at the Stadium. As noted above, the responses to the consultative process indicate that there are supporters who for health and other mobility related reasons (not only limited to the 20% of season tickets in the Over 65 or Under 13 categories) would not be able to walk to or from the Stadium from areas

outwith the EDPZ or the local public transport stops/stations, even if public transport was available. Further, the responses to the consultative process suggest that the existing public transport services have no further capacity to accept any further supporters on match days and that public transport around evening matches is even more problematic. Again, it is noted that Glasgow City Council has confirmed to Celtic FC in a letter dated 11 October 2017 that bus operators have stated at this stage that no real improvement can be made to existing services and that Scotrail have confirmed that they already provide the maximum number of carriages for each game.

In circumstances where the proposal would remove at least 2,000 parking spaces near the Stadium, and may displace many more further away from the Stadium, the impact on Celtic FC supporters and Celtic FC would be substantial. Given the absence at the present time of sufficient "*healthy and environmentally sustainable methods of transport*" to and from the Stadium on match days, in particular public transport, and given the broad range of needs of Celtic FC supporters, the Proposals would have the effect of preventing Celtic FC supporters from attending matches at the Stadium and making it materially more difficult for many other Celtic FC supporters to attend, which would disadvantage those supporters, would cause material economic damage to Celtic FC (due to lost revenue from the lower number of supporters attending matches) and it is believed would also adversely impact on the economy of the local community and Glasgow more generally by reducing the number of supporters attending matches at the Stadium.

It would be unreasonable to make the Proposals with the objective of encouraging the use of alternative methods of transport where the Council and relevant transport operators appear to have accepted at this stage that there is no scope for further public transport at this time and no such party has proposed or identified alternative methods of transport that may be used by the individuals affected by the Proposals. This key issue should be addressed before the Proposals are considered further or implemented.

- The proposed EDPZ is disproportionate and unreasonable

The EDPZ prevents waiting during relevant events, except for permit holders, across a large number of streets in a large area around the Stadium.

As noted above, the effect of the EDPZ would be to prevent Celtic supporters attending matches at the Stadium and to make it materially more difficult for many other Celtic FC supporters to attend, which would disadvantage those supporters, would cause material economic damage to Celtic FC and it is believed would also adversely impact on the economy of the local community and Glasgow more generally by reducing the number of supporters attending matches at the Stadium.

The Proposals suggest that the reason that the order is necessary is to preserve and improve the amenities of the area through which the roads run and propose introducing a permit holders only parking zone to maintain a functioning community when events take place. The Proposals do not contain any detailed analysis of the volume of traffic, concentration of parking in the EDPZ or specific parking concerns. The Proposals themselves recognise that it is possible to manage traffic and parking by other means, including targeted use of "no waiting at any time" as has been proposed in areas outwith the EDPZ (for example in Plan 1).

It is respectfully suggested that it would be more proportionate to consider implementing and testing such targeted measures, together with effective enforcement of such restrictions, to enable the community to function when events take place, supported by detailed analysis of

the volume of traffic, concentration of parking in the EDPZ or specific parking concerns. Prior to doing so, the widespread prohibitions against waiting during relevant events (except for permit holders) within the EDPZ is disproportionate and unreasonable.

- Loading or unloading of vehicles in any road - including in particular London Road, Clyde Gateway, Springfield Road, Janefield Street, Dalriada Street and Dunn Street – would prevent supporters attending matches, including those who do not intend to park within the EDPZ

The Proposals would prevent loading or unloading of vehicles in the majority of the prominent and currently utilised roads in the vicinity of the Stadium - including in particular London Road, Clyde Gateway, Springfield Road, Janefield Street, Dalriada Street and Dunn Street for a period of 3 hours before the match and 1 hour after the match. These periods would therefore apply for periods of time outwith those periods between 0700 hours and 1000 hours and between 1600 hours and 1900 hours in any applicable match day, given that kick off times typically range between 12 noon, 3pm and 7.45pm.

As noted above, the effect of this provision of the Proposals would be to prevent supporters, many of whom do so by reason of their health or mobility issues, being dropped off or picked up on the main roads nearby the Stadium.

This would prevent any vehicles (including taxis, private cars or shuttle buses), from stopping in these areas to drop off supporters before the match and/or pick up supporters after the match. This would mean that supporters who were not able to walk from parking areas outwith the EDPZ or the local public transport stops/stations, even if public transport was available, would not be able to attend the matches. This would be totally contrary to Celtic FC's efforts to enhance the accessibility of the Stadium for all and the ethos of inclusiveness fostered by Celtic FC and Celtic FC Foundation. This would be unreasonable.

- The Proposals may lead to further cars being parked in areas outwith the EDPZ

In the absence of alternative methods of transport for use instead of cars, the Proposals may lead to an increased volume of cars being parked outwith the EDPZ. If this were to lead to further proposals for an increased EDPZ, the adverse impact on Celtic supporters and Celtic FC would be increased. This would be unreasonable and highlights the need to address the public transport system prior to implementing the Proposals.

- The proximity of the Emirates Arena and the potential for events to be held at both venues

The Emirates Arena is located across London Road from the Stadium. Events are scheduled to take place at both venues from time to time. An existing arrangement regulates the use of certain private parking areas. The potential adverse effect on Celtic supporters, Celtic FC and other individuals attending the Emirates Arena would therefore be exacerbated on such days, as the volume of people attending the area increases and, as noted above, there would be no further capacity on the public transport system. This would be unreasonable and highlights the need to address the public transport system prior to implementing the Proposals.

- The Proposals are inconsistent with the Glasgow City Council Tourism and Visitor Plan to 2023 and the Glasgow Economic Strategy

The Glasgow City Council Tourism and Visitor Plan to 2023 and the Glasgow Economic Strategy aim to promote Glasgow as a sporting and events city. Celtic FC has fully embraced this, seeking to enhance the Stadium and its environs to help Glasgow fulfil these aims. Further

development plans for the area are already in motion to maximise the likelihood of successful bids for future, prestigious sporting events such as UEFA competitions however there is a genuine concern that the Proposals could jeopardise the likely success of the same. Given the effect of the Proposals noted above in the absence at the present time of sufficient "*healthy and environmentally sustainable methods of transport*" to and from the Stadium on event days, in particular public transport, and in particular given that individuals will be dissuaded from attending events (rather than dissuaded from using a car), the implementation of the Proposals would not promote Glasgow as a sporting and events city. This highlights the need to address the public transport system prior to implementing the Proposals.

Request for Hearing

Given the potential substantial adverse impact of the Proposals on Celtic FC, Celtic supporters and all those other individuals attending matches or other events at the Stadium, and the substantial concerns raised by supporters with Celtic FC, Celtic FC respectfully requests that a hearing is held in connection with the Proposals in accordance with regulation 8 of The Local Authority Traffic Orders (Procedure) (Scotland) Regulations 1999.

In any event, given that Celtic FC has objected to provisions of the Proposals and the proposed order which prohibit or have the effect of prohibiting the loading or unloading of vehicles in any road either at all times or for any period of time falling outwith between 0700 hours and 1000 hours and between 1600 hours and 1900 hours in any day, it is requested that a hearing is held in connection with the Proposals and the proposed order in accordance with regulation 8 of The Local Authority Traffic Orders (Procedure) (Scotland) Regulations 1999.

For and on behalf of Celtic plc



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1 June 2018