

<p>'The Mews', 3, Seaview Terrace, Ballsbridge, Dublin 4.</p>



Submission to Road Safety Authority regarding Road Safety Strategy, 2013-2020.

Introduction

Cyclist.ie is the all-island network for cycle campaign groups from Belfast to Cork and Galway to Dublin. Some of our members also have a remit for pedestrian interaction with roads and traffic. We cumulatively have decades of experience in analysing and contrasting Irish policy and practices with examples from other jurisdictions. Many of us are university researchers with access to world literature on road safety. Our analyses take in the whole range of issues of relevance to cycling safety including enforcement, engineering, education and evaluation. Our findings are published in our position papers and fact sheets which we attach. We are delighted to respond to the Road Safety Authority's invitation to make a submission regarding the development of its Road Safety Strategy, 2013-2020.

We note the emphasis in the previous strategy (2007-2012) on:

- Inappropriate and excessive speeding
- Impaired driving through alcohol, drugs (prescription or non-prescription) or fatigue
- Lack of use of seat belts and child safety constraints
- Unsafe behaviour towards / by vulnerable road users (pedestrians, motorcyclists, cyclists, young children and older people)

We, like the RSA, are impressed with the apparent progress that has been made on these issues over the period, and commend the RSA on the level of success that has been achieved. However we have pointed out that the recent welcome reduction in fatalities is, in part perhaps, explicable by economic factors such as unemployment, fuel price increases or reduction in HGV use by the construction business all leading to fewer trips per vehicle in the national fleet.

Cyclist.ie has a general concern that the existing approach of the RSA to cycling safety seems to concentrate on making cyclists 'dress up like a Christmas tree' and to wear body armour PPE, whereas the correct approach from a classical risk-control methodology is either to ban cyclists from our public roads (arguably the worst policy

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decision we could make) or to tame the real and present danger to cyclists, which is the 1.4 tonne plus metal projectiles being driven by less than competent drivers along our roads.

We do not approve of the RSA's approach to what we call the 'dangerisation' of cycling.

The national policy context for utility cycling

The State has to develop walking and cycling (active travel) as routine, comfortable and safe modes for as many short journeys (typically less than 6 km for cycling) as possible from now on in order to meet the government's traffic congestion, climate change, greenhouse gas emission control and healthy lifestyles objectives.

The government's goal for a cycling modal-share of 10% by 2020 is set out in The National Cycling Promotion Policy Framework of 2009. [<http://tinyurl.com/cq7pk5v>] Census 2011 data released last week shows that only a bare 2.3% of commuting trips were made by bike.

[<http://www.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?maintable=CDS33&PLanguage=0>]

From the perspective of Cyclist.ie, existing road traffic management and safety policies seek essentially to maintain 'free-flow' of traffic along with motor vehicle dominance of our roads. Indeed the 'mission-statement' of the Garda Traffic Corps states quite baldly: "The Garda Traffic Corps is dedicated to the enforcement of road traffic legislation and also to **assisting the free flow of traffic**".

[<http://www.garda.ie/Controller.aspx?Page=1368&Lang=1>]

Invariably and unfortunately, the free-flow of motorised traffic may be inimical to cyclists' safety, and above all 'comfort', simply because it can lead to higher vehicle free-speeds. Paradoxically, many experienced cyclists seek congested roads as vehicle speeds are generally lower! Inexperienced cyclists by contrast have the mistaken view that congested traffic is more hazardous and risky.

The 10% modal-shift target will not be met, in our view, by 2020 unless there is a marked change in driver behaviour in traffic where there are vulnerable road users present, and not just in urban areas but rural ones too. The RSA has to play its part in achieving this modal-shift.

Traffic management and road safety policy from now to 2020 and beyond should be formulated and implemented with the 10% of commuting trips target in mind. There

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will have to be many more bikes on our roads. This should bring the benefit of the 'critical-mass' effect on road traffic collision incidences and severity because drivers will have to be more aware of cyclists and slow their vehicle speeds down.

Transfer of many short journeys (<6km) from sedentary transport to active transport will incontrovertibly have a beneficial safety effect for all road users by 'calming' vehicular traffic providing that cyclists are fully on-road as opposed to being in segregated cycle tracks.

By way of general background for those in the RSA that don't commute by bike, what cyclists, and newcomer ones in particular, find so disconcerting and frightening is the over-fast and over-close overtaking by drivers, particularly by goods vehicles, buses, coaches and taxis. The latter three categories of vehicles share the bus lane system with cyclists. However goods, bus and coach drivers have to undergo annual CPC certification which helps to ensure that these drivers have some understanding of cyclists' safety requirements. Taxi drivers do not have to undergo an annual CPC so we want to see taxi drivers brought under appropriate CPC by end 2013.

Drivers cannot be permitted to continue to 'skim past' riders in overtaking them. This message must go out loud-and-clear to ADIs and drivers in any new strategy.

In the submission below we have attempted to group our comments within the broad categories as suggested on the RSA website. These are:

- Education measures,
- Enforcement measures,
- Engineering measures,
- Monitoring/Evaluation measures.

2 Education Measures

Many Irish drivers don't fully understand (or accept?) that vulnerable road users are entitled to be on our non-motorway road system and therefore they don't know how to interact safely with these road user categories, whether as pedestrians, cyclists, or other. We propose a radical approach to driver education through the Approved Driving Instructors (ADIs) system, along with media advertising campaigns and Garda intervention. It is absolutely necessary that ADIs fully understand vulnerable road users' needs and thus impart proper respect for cyclists and other road users during instruction sessions with trainees. We have to be convinced that ADIs are imparting appropriate advice about safe interaction with cyclists. Only the RSA can offer that assurance. **It is an issue of major concern to us.**

We call for the following simple measures to be reflected in the driver training process:

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1. A safe overtaking clearance of 1.0-1.5 m that will be part of the driver training syllabus. The Rules of The Road will be modified to show this in practice as soon as possible, complemented by appropriate TV adverts showing drivers how to overtake cyclists safely. This new advice to emphasise/remind drivers that, if there's inadequate space to allow 1.0 to 1.5 clearance, they must WAIT behind the cyclist, not try to squeeze past!
2. The 1.0-1.5 m clearance applies to cyclists within a cycle lane, and that sometimes this also requires drivers intending to overtake to hold back until the roadway widens;
3. Drivers will be taught to understand why bike riders may take up a road position so as to control or command the vehicle lane or carriageway. This is a central precept of 'Bikeability' training but unless vehicle drivers know about the principle then cyclists will be put at risk. The Rules of the Road need to make this clear as well.
4. Careless opening of car doors can lead to the maiming of cyclists by 'dooring' accidents where the cyclist is seriously injured by impact. Drivers will be taught not to open a car door until they have checked for the presence of a cyclist in close proximity to the vehicle by use of all mirrors and by head turning to the side and rear. Drivers will have to instruct passengers on when it is safe for a door to be opened. Taxi drivers, in particular, will need to warn passengers not to open doors of any taxi until permission is given by the taxi driver;
5. Drivers will be made aware that under both Irish and International road traffic law, a rider of a bike is a driver of a vehicle;
6. Drivers will be informed during training and in the Rules of The Road that it is in order for cyclists to cycle two-abreast [a lot of drivers can't accept that cyclists may cycle two-abreast];
7. Recognition by the Rules of The Road that sports cyclists (training for road racing) or touring groups will ride by adopting a 'peloton' configuration because this presents the most appropriate conformation for a body of cyclists to be overtaken safely and with minimum disruption to other vehicles;
8. Goods, bus and coach drivers have to undergo annual CPC certification which helps to ensure that these drivers have some understanding of cyclists' safety requirements. At present Taxi drivers do not have to undergo an annual CPC so we want to see taxi drivers brought into the CPC scheme.

In Summary - Cyclist.ie calls for the **RSA to develop and implement a new driver training regime, recognising that cyclists and other vulnerable road users are entitled to be safe on the road and those drivers will be formally trained to interact with respect for the vulnerability of these users.**

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The government's stated goal for a cycling modal-share of 10% by 2020 is set out in The National Cycling Promotion Policy Framework of 2009.

[\[http://tinyurl.com/cq7pk5v\]](http://tinyurl.com/cq7pk5v). This proposed 10% modal-shift target will not be met, in our view, by 2020 unless there is a marked change in driver behaviour towards vulnerable road users, not just in urban areas, but rural ones too.

The RSA has to play its part in achieving this modal-shift. Other than improved driver training the RSA needs also to establish a nationwide recognised cycle training program, and work with the An Taisce Green Schools project or local authority schemes. School pupils learning the Rules of the Road combined with on-road 'Bikeability' training will in time become better vehicle drivers.

At present we understand that schools can opt out of provision of cycle skills training offered by An Taisce Green Schools or Local Authorities. We believe this to be unacceptable as it reduces the national provision of vital road sense and cycling skills training. Schools should not be able to opt-out from cycling skills and road safety training. The Department of Education and Skills must be involved in the process by making sure Boards of Management accept that cycling skills programmes will be made available in every school.

We call on the **RSA to recognise the UK Department for Transport's and CTCs 'Bikeability' training syllabus immediately, and implement it nationwide, particularly through the schools network.** There has been far too much foot-dragging on the recognition of this appropriate standard for cycle training. Cycle training from an early age is critical in developing an active population into the future, and thus reducing the growth in obesity levels among young people in particular.

One measure that arises from the implementation of the 'Bikeability' syllabus is the fact that cyclists may have to 'control-the-lane' in order to position themselves safely in traffic (see recommendation #3 above). The Rules of the Road must be amended to explain and show drivers this reality.

3 Enforcement Measures

There are numerous examples of Traffic Laws, which are, in Shakespeare's phrase, 'recognised more in the breach than the observance'. Some of these can be observed daily on our national roads with excessive speeding and general breaching of both vehicle type-specific or general speed limits. Cyclist.ie calls for a greater focus on speeding in urban areas where most vulnerable users are. The law in relation to use of a mobile phone while driving is another commonly observed breach. But other devices can cause problems

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Inattention for a millisecond at speed leads to pronounced vehicle track drift that may have serious consequences for vulnerable road users like cyclists and pedestrians. This inattention while driving can be due to fiddling with:

- (1) hand-held mobile devices (smart-phones) while texting, viewing images or downloading data,
- (2) using GPS navigation systems,
- (3) changing play-lists on CD-players, iPods and MP3s,
- (4) turning to deal with children's needs in rear seats, etc.

We would wish to see an **RSA campaign given to driver 'inattention' in all its forms with an emphasis on risk to vulnerable road users, in particular.**

Another area where enforcement is critical is in new approaches such as the 30 km/h speed limit area in Dublin City and the College Green Bus-gate. Both of these proposals have generally had a very positive effect on the City environment, but breaches of the system are regularly observed.

Cyclist.ie particularly wishes the RSA to dwell on two of the significant contributors to road traffic collisions (RTCs) involving cyclists as identified by the RSA in its Consultation Document 2013-20:

- Unsafe behaviour towards / by vulnerable road users (pedestrians, motorcyclists, cyclists, young children and older people)
- Inappropriate and excessive speeding

4 Engineering Measures

The National Cycle Manual (<http://www.cyclemanual.ie/>) was published on-line in 2011. However in our view, there is a need for improved guidance for Irish road/traffic designers recognising all users of the road more equally. There are examples from other countries that could usefully inform revised Irish practice and we will be happy to provide more detailed discussion if required.

Our attached joint position paper sets out a range of best practice interventions under the headings of enforcement, engineering and education. The topics discussed complement the National Cycle Policy Framework by explaining in more detail the nature of the infrastructural and legislative deficits to be addressed. The issues discussed in our policy document also mirror those that informed the drafting of the National Standard Cycling Syllabus for England and Wales. They provide the reader with a good understanding of the research base that underpins modern cycle training. Our legislative proposals as summarised on page 20 draw extensively from Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Fingal Cycling Initiative; Maynooth Cycling Campaign; Waterford Walk/Cycle Campaign; SligoCycles; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI network.

our European neighbours who have a much better record in both safety and providing a balanced road transport system.

The development of 30 km/h zones throughout residential areas and cities must be accelerated in the interests of the nation's children and their right to a safe environment. At a time when children's levels of physical activity are decreasing we must do all in our power to provide an environment where this trend can be reversed. The imposition of slower residential speeds is essential in that process.

The recent Vancouver International Cycling Conference (Velo City 2012) recognised this issue of Children's travel and play rights and needs in agreeing the following declaration:

1. To adopt a goal to improve the situation of children around the world in part through sustainable transport policies and strategies;
2. To include cycling as part of all sustainable transport policies and strategies;
3. To adopt a target of providing opportunities to cycle for all people around the world;
4. To promote active mobility for people of all ages and abilities and to improve the safety and accessibility of roads and public spaces, especially for children;
5. To develop and promote programs that encourage walking and cycling to school;
6. To develop and provide cycling skills training to all children at an early age; and
7. To cooperate closely with cycling advocacy and promotion organizations and other citizens' organizations to encourage more children to cycle more often

As Gil Penalosa, the former Mayor of Bogota in Colombia, and international cycling advocate stated in relation to urban design - "If it's not good enough for a child, it's not good enough."

Cyclist.ie calls on the RSA to recognise the rights and needs of children, and other vulnerable road users, by advocating the widespread development of 30 km/h zones throughout the country.

In this context we fully support the Minister for Transport, Tourism and Sport's recent Directive to roads' authorities to review existing speed limits for appropriateness. Far too much of our rural road system has a default speed limit of 80 km/h applied when many of the roads are not safe at even with a 50 km/h maximum limit.

We further note that Minister's intervention on speed limits could be extended to other safety problems as discussed in our position paper such as road narrowings and pinch-points, one-way streets, inappropriate lane widths and unsuitable cycling infrastructure.

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5 Monitoring/Evaluation Measures

The remarkable improvement over the period of the previous road safety strategy is recognised, in particular the significant decrease in road accident deaths. These accidents and their cost to the State overall is recognised, but in tandem with this there is the under-reporting and collection of data related to collisions and serious injuries as a result of road accidents. These statistics must be collected and published, to enable us to fully understand all the complexities and consequences of the range of traffic accidents.

Cyclist.ie calls on the **RSA to ensure that road accident data for all level of accidents, including cycle accidents, is collated and analysed**, in order to feed into continuous improvement in accident reduction and in our general knowledge of accident causes. We are most concerned by the findings of the Bedford report on RTCs [HSE, 2011.

http://www.hse.ie/eng/services/Publications/HealthProtection/HSE_Dublin_North_East_Publish_the_First_National_Study_on_Road_Traffic_Collisions_Requiring_Hospitalisation_in_Ireland_.html] that An Garda is only recording 10% approx of serious injuries suffered by cyclists in RTC impacts. This is a scandal.

We want to see road safety programmes concentrate on the serious injuries incidences from now on and not just on fatalities. The metric should not be just absolute numbers of serious injuries but rather as an incidence rate per km travelled or per trip. A measure of cycling trip frequency or distance travelled will have to be instituted to enable this to be established.

The Garda RTC form will need to clearly seek information on whether or not the cyclist was wearing a helmet at the time of impact.

ENDS

Cyclist.ie Position Papers are attached.

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