



Suggested revision of 'The Rules of The Road' submitted by 'Cyclist.ie' to the Road Safety Authority

Cyclist.ie is the network for all the cycling campaigns on this Island and is the member for Ireland of the European Cyclists' Federation.

22 November 2012

Introduction

As the Road Safety Authority (RSA) knows, Cyclist.ie is the umbrella body for the many cycling advocacy groups throughout Ireland. Our goal is to see a marked increase in the numbers of Irish people using their bike for work, shopping or socialising. Anecdotally it is neophyte cyclists' first experience of road and traffic conditions that frightens many off after trying it for just a few days. Once frightened it is difficult to persuade them to try it again. The benefits of increased cycling are many: improved population health (overweight/obesity, aerobic fitness, cardiovascular health, *etc*); personal and public cost savings; better traffic flow; environmental improvement, and better liveability of cities. Our mission is to inform the Irish public and officialdom of these benefits, and the simple changes – road engineering, education, enforcement and other measures - required to reap them.

Cyclist.ie has nine of its members trained as certified 'Bikeability' instructors under the UK's Department for Transport National Standards cycling skills syllabus.

Many of our key officers in the campaigns are third-level researchers with access to the World's road safety research literature.

We understand utility cycling and are passionate about its benefits. It is a truism to say, in Ireland, most cyclists are drivers but most drivers are not cyclists. It is the reverse in Denmark and The Netherlands where many drivers are regular cyclists too. It is this stark absence of a large cohort of everyday or utility cyclists from policy-making that leads in our opinion to a 'from-the-windscreen-view' of road safety and traffic management both in the RSA and in An Garda. We plead for a change in culture.

Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.

The encouragement of widespread cycling (urban or rural, whether for commuting or socialising or not) is not just our policy, but Government policy, as set out in the National Cycle Policy Framework, 2009. Other statutory and advisory documents, such as the Institute of Public Health's 'Building Young Hearts' (2010), make it very clear that all measures to promote active over sedentary transport, particularly for children, are valuable to Irish society at large.

[<http://www.publichealth.ie/news/buildingyounghearts>]

We point to the evidence that approximately 26% of Irish 9 year olds are overweight or obese. [ESRI, 2011: Growing up in Ireland.

<http://www.esri.ie/UserFiles/publications/bkmnext211/BKMNEXT211.pdf>]

One explanation is that children are not being active enough in use of healthy travel modes. Our roads and traffic conditions have got to be changed so as to encourage the return to cycling to school of pupils.

We applaud the RSA's record at reducing road fatalities in recent years and its commitment to 'cultural change' in road use. We would emphasise that recent significant increases in cycling in central Dublin are widely acknowledged - notably by Noel Brett (CEO) and Garda Superintendent Aidan Reid (DMA Traffic Corps) - to have resulted in safer streets for all road users.

Context to this submission

This submission follows 2007 and 2006 detailed submissions from Cyclist.ie, Dublin Cycling Campaign, and Galway Cycling Campaign, portions of which are yet to be addressed in public policy. Our recent submissions to the review of the Driver Training regime and Road Safety Strategy Review are also of relevance.

As you know the National Transport Authority's '2030 Vision' builds its future transport plans around the internationally-recognised 'Hierarchy of Road Users', which sets out a framework for consideration of travellers' needs: Pedestrians, cyclists and public transport users being at the top, with private vehicle users below. This concept should inform Rules of The Road (RotR) guidance from now on, and should – as is practice in, for instance, the UK's 'Road Code' guidance - provide the structure for the document, *i.e.* chapter for Pedestrians first, with emphasis that these are the most important road users. The current ordering of the RotR seems to relate to the complexity or weight of the vehicle, which could be said to reflect a 'might-is-right' road-culture, still sadly seen in the developing world, but best relegated to history here. It is important for drivers to understand that they don't own our roads – roads are a shared public space and drivers have an overweening public duty to share the roads with more vulnerable road users, including cyclists, which are an increasing, and favoured, component of traffic. [<http://www.2030vision.ie/>]

Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.

We welcome the advice given cyclists in the RSA's recently filmed video clips to adopt the primary lane position or 'command/control the lane', in certain circumstances. This follows international best practice in cycling skills training. This advice must be promulgated **urgently** to drivers, and incorporated in all ADI and CPC syllabi. At present Irish drivers do not understand why cyclists are riding in the control position. Cyclists are being intimidated on Irish roads on a daily basis by drivers who have not learnt, or accepted, this simple concept, and who refuse to grant cyclists safe road space. This could be remedied quickly with appropriate RotR revision and a combination of TV advisories for drivers and ADI instruction. It does not require any immediate legislation.

Submission on text of Rules of The Road

General

- Remind all road users that cyclists are not only entitled to use the road, but also that it is State policy to **encourage** cycling for safety, health, economic, road-capacity and urban 'liveability' reasons. Remind both drivers and cyclists that the bicycle is a vehicle in both Irish and International law; Spell these reasons out and provide high-quality photographs to reinforce & illustrate the points. Remind drivers that it is government policy to encourage eco-tourism based on walking and cycling touring and that drivers must expect to find these vulnerable road users quite literally around every bend in areas of outstanding natural beauty. State clearly that short (<6km) car journeys **should** be replaced by bike journeys where possible, and explain the significant toll on road safety, public health and the environment that using a car unnecessarily for such short journeys takes on society.
- Provide clear, illustrated information on the features of the bicycle, as a vehicle: width across shoulders of rider (approx. 0.9 m); as a meta-stable machine, it will wobble to maintain balance (its dynamic-envelope is typically 1.5 m) so it can't track in a predictable manner due to wobble (totally unlike 2-axle vehicles); it is influenced by gradient and wind speed/ direction; its ability to deal with potholes might be very little other than provided by pneumatic tyres; it is affected by slipstream of larger and/or speeding vehicles; is vulnerable to car doors' opening (the 'dooring' of the rider can cause serious injuries or fatalities); cyclists' psychological features, including the fact that over-close/-fast overtaking is alarming at best; driving the bicycle 1.0 m from the road edge improves visibility, vision, road surface quality/condition available (repeated later), *etc.* Remind drivers that the rider has no protection from impact with either road surface or features (lamp posts) or vehicles – no steel body-cage, no seat-belt and no air-bag. In short, a lot care has to be taken by motorised vehicle drivers interacting with bike riders on our roads.

Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.

- Remove any and all implications that cyclists can disproportionately influence their safety around motor vehicles by maintaining their bicycle, wearing hi-visibility outfits or helmets, or keeping off carriageways. Such items can be useful but their emphasis is currently wildly disproportionate compared with failure to mention motorists' responsibilities and duty of care to the more vulnerable;
- The recent changes in regulations, signed by Minister Dr. Varadkar, must be incorporated and reflected in any revised RotR; [S.I. No. **332** of 2012; S.I. No. **331** of 2012]
- Clearly and simply define the types of 'cycle lane' and 'cycle track (path)'. Make it clear that mandatory-use requirement for cyclists has now been abolished but that drivers of motorised vehicles must not park or drive in them and point out that illegal use of cycle lanes and tracks are penalty-point offences. Reiterate, that cyclists and pedestrians are as much entitled to use roads as drivers. 'Roads are for people, not drivers'; remind building contractors that waste skips must not be placed in cycle lanes or tracks.

It is questionable whether non-mandatory (advisory) cycle tracks make a positive contribution to road safety. Their continued use, generally ignored by motorists and subject to the proviso that a vehicle must be loading or unloading while parked in them, as well as their often poor design, devalue road safety generally. The advice to cyclists (p.159) that they may leave such a lane if a vehicle is blocking it to be loaded or unloaded, even prior to recent legal changes, is absurd in the context of widespread abuse by parking motorists, and should be removed.

Aimed at motorcycle riders

Keep out of bus lanes, cycle lanes and tracks and ASL boxes at junctions. These are penalty-point offenses. You are not permitted to use cycling facilities.

Aimed at Motorists

- Write separate sections for 'cyclists' and 'motorcyclists' (p.172) in accordance with the Hierarchy of Road Users;
- Include the well-known 'S' curve graph or clear figures illustrating the much higher survivability of vehicle impacts at and under 30 km/h; This visual message is vital in order to create widespread acceptance of the need for lower speed limits in urban areas and in residential estates, in particular.
- Existing note on duty of care is worthwhile, but very weak. Emphasise that motorists are not the only road users, but present disproportionate hazards compared to vulnerable road users. Repeat that, cyclists are not only entitled to use

Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.

the road, it is State policy to encourage cycling due to its immense societal benefit (p.172);

- Promote and highlight a 1.5m clearance distance for overtaking at average urban speeds, whether or not the cyclist is in a cycle lane (p.173); remind drivers of the 'dangerous overtaking' penalty-point offence (S.I. No. **182** of 1997, s. #10); the speed of overtaking can affect the stability of a rider due to large air-displacement effects.
 - Warn drivers about 'cutting-in' in front of riders at threshold of junctions – hold back until rider has cleared junction arm.
- Remind drivers that cyclists will not use the extreme left of the carriageway (kerb and gutter zone); that for better road surface, vision and visibility to drivers, a 0.5-1.0 m distance from the kerb is best (p.172 or 3);
- Emphasise that cyclists must often 'command/control-the-lane' (p. 173); provide illustrated examples of such situations
- Under 'overtaking' on that page, include a reminder that drivers must often wait behind a cyclist if it's unsafe to overtake; replace 'should' with 'must' and replace 'plenty of space' with '1.5 metres' and use bold type for the 1.5 metres. Insert new sentence 'Wait until it is safe to overtake, particularly when you are faced with oncoming traffic. Do not try to squeeze/skim past the cyclist. This risks the cyclist's life and is frightening for cyclists. Wait until the oncoming vehicles have passed by'; Again remind drivers about the 'dangerous overtaking' offense.
- Note that cyclists will give parked cars a 1-metre clearance when passing them, to avoid carelessly opened doors (p. 173);
- Remind drivers that cyclists may or may not be wearing hi-viz clothing, and that the responsibility for seeing a cyclist lies with the motorist, who can expect, during darkness, front and rear lights and reflectors as required by law.
- Remind drivers of the effects of gradient and wind on cyclists - e.g. much faster going downhill, may weave more on uphill routes, etc.
- After 'It can involve speeding' insert, 'dangerous overtaking of cyclists' in the advice regarding road rage. (p.138)
- Emphasise that drivers must be aware they should stay outside cycle lanes when in convoy or stopped at junctions, to enable cyclists to pass safely on the inside along the marked cycle lane.

Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.

Aimed at Cyclists

- Delete content of p.155, 156 and section 'bicycle checklist'. Replace with brief summary of legal requirements and perhaps one paragraph on keeping chain oiled, tyres inflated, and seat at height that allows leg full stretch when pedalling, *etc.* Note that being able to stand with feet flat on ground while astride the seat probably means the saddle is too low, and may lead to knee injuries. Saddle height should be adjusted so that one can touch the ground with ball of foot or, so that the legs are not quite fully extended in the lowest pedal crank position when cycling;
- Important to remind cyclists that they are in charge of a vehicle, and rules of road apply to them. Refer cyclists to relevant sections of RotR for e.g. lane discipline, rights-of-way, hand signals *etc.* (p.158);
- Advise cyclists to ride positively, decisively and predictably, and be able to make full head-turn over shoulders to check for following traffic and/or to gain eye-contact with drivers, while keeping a reasonably straight track.;
- Advise cyclists to seek training in Cycle Skills/Cyclecraft from a qualified instructor (p.155);
- Emphasise the importance of making eye-contact with drivers (p.158-162);
- More emphasis on commanding/controlling the lane (p.158-162);
- Increase the emphasis on the dangers of left-turning HGVs (p.158 § 5). UK 'Road Code' includes an exemplary illustration; refer riders to RSA web-site URL for HGV-cyclists safe interaction video. [<http://www.rsa.ie/RSA/Road-Safety/Education/Road-safety-tips/HGV-drivers-and-cyclists1/>]
- Roundabouts: Add in: 'Command/control your lane; make eye contact, hand signal as and when appropriate and continue around the roundabout as if you were driving a motorised vehicle' (p.163);
- Include a small diagram showing best angle/manoeuvre to cross tram or embedded rail tracks. Warn about oblique interaction with tram/rail flanges and the risk of wheel entrapment.
- Insert a new sign which shows that vehicles are forbidden except cyclists. Refer to recent changes to Road Traffic SI's (p.179)
- Public consultation should be urgently undertaken with a view to creating a code of conduct for shared pedestrian/cyclist spaces such as on public squares, public parks, canal towpaths, pedestrianised-zones, *etc.* This might take the form of easily-understood guidance similar to the Safe Cross Code, or a set of pictograms
Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.



illustrating good and bad behaviours. Slow considerate cycling is often called for, but is difficult to define and enforce. A reasonable starting point might be the code South Dublin County Council produced for signage on the Grand Canal walkway.

ENDS

C.C.

Minister for Transport, Tourism and Sport, Dr. Leo Varadkar

Ms. Laura Behan, Sustainable Travel Division, ditto

Mr. Gerry Murphy, CEO of National Transport Authority

Mr. Fred Barry, CEO of National roads Authority

Assistant Commissioner Gerard Phillips An Garda Siochana, Traffic Corps

Dublin Cycling Campaign (DCC); Galway Cycling Campaign (GCC); Cork Cycling Campaign (CCC); Limerick Walk/Cycle Campaign; Skerries Cycling Initiative; Maynooth Cycling Campaign; Sligo Walking Matters; Kerry Bicycle Festival; Mayo (Westport) Cycling; CTC Right to Ride NI Network.