



# DBACK ON THE NATIONAL CYCLING STRATEGY AND ACTION PLAN

31 JANUARY 2019







awaited cycling strategy for the Maltese islands. Such strategies are needed to set out a framework about how as a country we are set to achieve a modal shift in favour of cycling, together with other sustainable means of transport.

While it is encouraging to see authorities starting to include cycling in their planning and policies, this document, which is over 100 pages long, dedicates much of its focus on the current abysmal status of cycling in Malta, rather than offering tangible solutions and feasible targets that will make cycling an attractive sustainable mode of transport.

As the only non-governmental organisation that promotes cycling as a means of sustainable transport, the Bicycle Advocacy Group (BAG), after holding a consultation meeting with its members, is proud to present its feedback on the National Cycling Strategy and Action Plan, whilst auguring that this would be an opportunity for collaboration between BAG, the relevant authorities, and other stakeholders

This feedback includes some points which have been submitted individually by some of our members, and also other points raised in our meeting with them or in their communication with us. In this way, we are representing the general feeling of our members but not undermining the need for them to submit their own feedback individually.

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## Feedback

### Data is not up to date or consistent with targets

The strategy makes several references to data, events, and the state of infrastructure up to 2016, possibly revealing that the bulk of this document was written either by the end of the same year or early 2017. Given that in 2018 we have seen several infrastructural changes on our roads, this document may well be incompatible with today's reality.

The strategy states that targets have been identified which will aim to double cycling by 2050 as compared to 2010 numbers (pg 53). Since cycling currently accounts for less than 1% of the country's modal share, this goes against the purpose of the same strategy, and government's ambition to turn Malta into a walking and cycling nation by 2025 (pg 8).



### Inconsistencies within the document

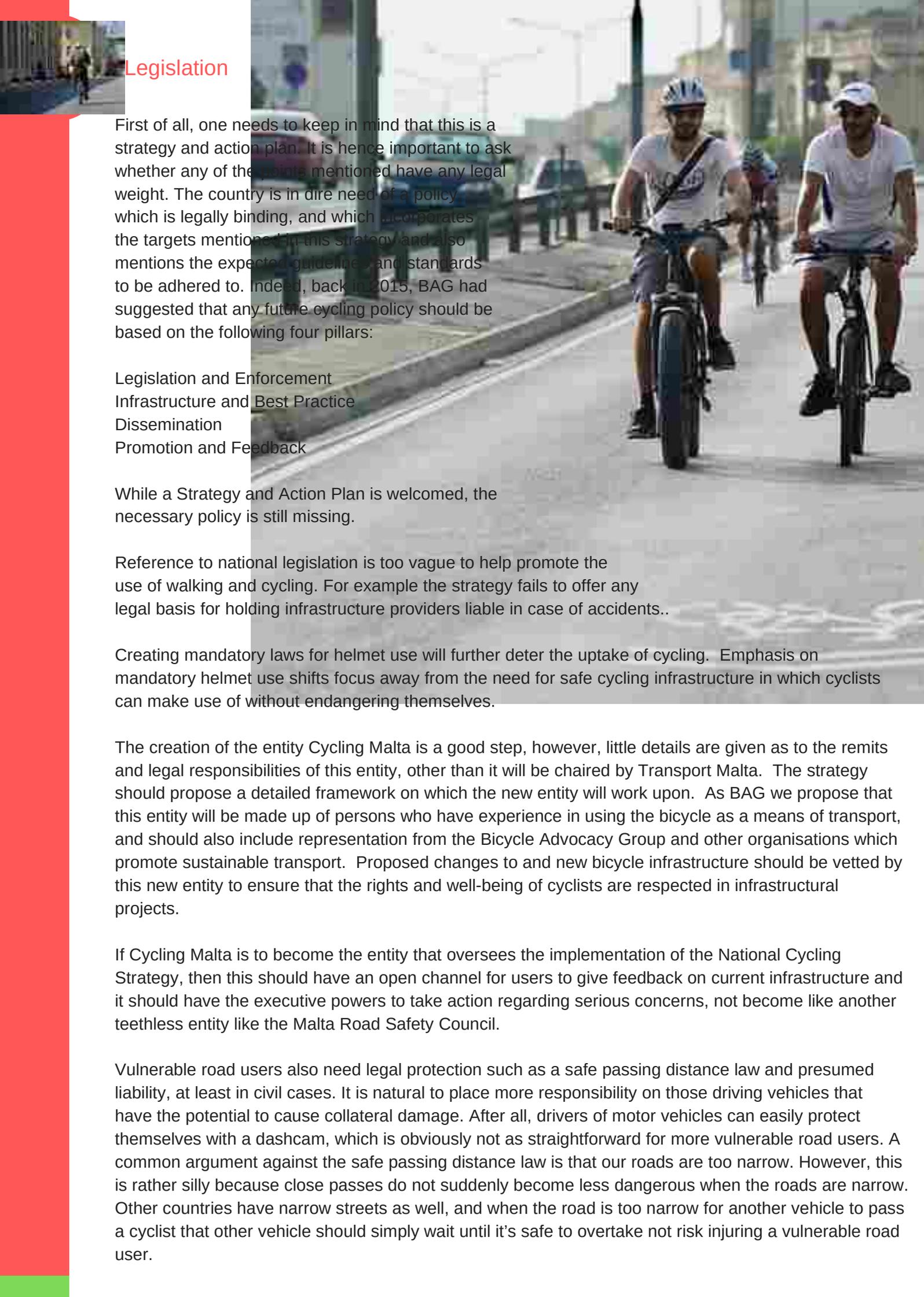
It is also worth mentioning that there are no set targets, as claimed by the strategy on page 11, in the EU white paper "Roadmap to a Single European Transport Area - Towards a competitive and resource efficient transport system".

The priorities in the strategy are wrong. Some long-term goals, for example, like bicycle parking in the interchangeable hubs and reducing the speed of cars in the planned cycle routes, should be included as short-term targets. The reason is that both of these are minor changes that require little investment which can be easily implemented in the short term.

As for the objectives set in this document, the strategy aims to "ensure that the design of cycling infrastructure and facilities is according to standard guidelines. (pg 54)", however, no reference is made to the guidelines used. Moreover, the strategy identifies the need for the creation of standards and guidelines as a short-term measure (pg 66). To identify the current shortfalls and how these can be addressed, the strategy must clearly identify the standards being used.

Currently, we are witnessing inconsistent and sub-standard cycling infrastructure being included in new road projects.





## Legislation

First of all, one needs to keep in mind that this is a strategy and action plan. It is hence important to ask whether any of the points mentioned have any legal weight. The country is in dire need of a policy which is legally binding, and which incorporates the targets mentioned in this strategy and also mentions the expected guidelines and standards to be adhered to. Indeed, back in 2015, BAG had suggested that any future cycling policy should be based on the following four pillars:

- Legislation and Enforcement
- Infrastructure and Best Practice
- Dissemination
- Promotion and Feedback

While a Strategy and Action Plan is welcomed, the necessary policy is still missing.

Reference to national legislation is too vague to help promote the use of walking and cycling. For example the strategy fails to offer any legal basis for holding infrastructure providers liable in case of accidents..

Creating mandatory laws for helmet use will further deter the uptake of cycling. Emphasis on mandatory helmet use shifts focus away from the need for safe cycling infrastructure in which cyclists can make use of without endangering themselves.

The creation of the entity Cycling Malta is a good step, however, little details are given as to the remit and legal responsibilities of this entity, other than it will be chaired by Transport Malta. The strategy should propose a detailed framework on which the new entity will work upon. As BAG we propose that this entity will be made up of persons who have experience in using the bicycle as a means of transport, and should also include representation from the Bicycle Advocacy Group and other organisations which promote sustainable transport. Proposed changes to and new bicycle infrastructure should be vetted by this new entity to ensure that the rights and well-being of cyclists are respected in infrastructural projects.

If Cycling Malta is to become the entity that oversees the implementation of the National Cycling Strategy, then this should have an open channel for users to give feedback on current infrastructure and it should have the executive powers to take action regarding serious concerns, not become like another toothless entity like the Malta Road Safety Council.

Vulnerable road users also need legal protection such as a safe passing distance law and presumed liability, at least in civil cases. It is natural to place more responsibility on those driving vehicles that have the potential to cause collateral damage. After all, drivers of motor vehicles can easily protect themselves with a dashcam, which is obviously not as straightforward for more vulnerable road users. A common argument against the safe passing distance law is that our roads are too narrow. However, this is rather silly because close passes do not suddenly become less dangerous when the roads are narrow. Other countries have narrow streets as well, and when the road is too narrow for another vehicle to pass a cyclist that other vehicle should simply wait until it's safe to overtake not risk injuring a vulnerable road user.



## Vague references

Obviously enforcement is also necessary. It's pointless to have many strict laws that are not enforced. The points system that was recently introduced is a good deterrent, but without proper enforcement it's not as effective as it should be. Illegal parking should also be included in the points system because illegal parking is an unnecessary hazard that renders the road more dangerous for vulnerable road users since it reduces sight-lines and blocks access to cycling and walking infrastructure.

Social and financial aspects should be clearly identified in the proposals, with social and financial gains that are expected from each proposal being clearly indicated for each recommendation.

The strategy also does not indicate any changes to the law regarding the safe overtaking distance of cyclists by cars. Many cyclists complain about close passes from speeding vehicles which endanger their safety.

There is no mention of potential benefits to public health by increasing cycling. No mention of targets to improve public health by increasing cycling. The HEAT tool (<https://www.heatwalkingcycling.org>) can be used for making calculations of public health expenditure savings. These savings can be redirected to further improve cycling infrastructure.

Finally, the strategy does not mention anything about educating children on cycling in schools as part of their curriculum. This should be included so that in the long term we have the next generation of active cyclists.

The Action Plan comes short of specific deadlines for achieving the objectives of the strategy, and naming which entity or authority will be responsible for the completion of each set objective.

Specific indicators for measuring the degree of achievement are absent.

## Dangerous infrastructure not being addressed

The strategy needs to address some serious gaps and failures of various existing infrastructures which clearly fail to provide an adequate network.

Examples include the design of 'cycle lanes' as quasi-footpaths, adopting similar design (walking) speeds and priorities at junctions and intersections, as seen at Mgarr, Ċirkewwa and Hal Far despite being over long 'rural' distances.

Another example of entrenched thinking is the design of segregated cycle lanes at Triq Bormla and Triq Hal Luqa where side roads cut across the cycle lane. Despite the fact that this fault was pointed out over a decade ago for the Mgarr Bypass, it reappears on the new cycle lanes on Aviation Avenue.

Rather than that we should be designing a 'cycle lane' as if it was for cars with similar, albeit slightly slower vehicle speeds and similar priority at junctions. Such layouts and discontinuous schemes create confusion and eventually lead to disuse as cyclists learn not to trust cycle lanes of dubious priority.

The strategy not only fails to recognise these serious shortcomings, but offers no measures to ensure that mistakes are not repeated, and that new infrastructure follows acceptable standards that render it safe, direct, and convenient for its users.



The use of sharrows or “share the road” signs are not sufficient to provide safe cycling conditions, especially on roads with speed limits of greater than 50km/h. The strategy should communicate clearly what forms of bicycle parking are preferred, and what space requirements are required so that entities such as Local Councils select the proper design when purchasing and installing bicycle parking facilities. The bicycle racks in images used in this document are undesirable due to their poor design and usability for cyclists. Common Sheffield U-type frames are the commonly accepted best choice for safely locking a bicycle, and these should appear in all documentation.



## The National Cycling Route Network

The action plan also makes reference to the development of a National Cycling Route Network, made up of 3 categories:

Inter-Urban

Urban Safe

Cycle Friendly Streets

With respect to Inter-Urban Cycle Routes, the document again comes short in giving details to what type of infrastructure is expected, except for “These cycle routes will generally be those found on or alongside major roads where the allowable speed limits are greater than 50 km / hr” (pg 64). The strategy must be more specific as to what cycling infrastructure will be built on such roads, and clearly state that this cycling infrastructure is wholly segregated and exclusive to cyclists, as required by several European accepted standards.

The pilot safe cycling routes, as highlighted in Annex 1 (pg 72 onwards) are not always considering the fact that cycling infrastructure needs to be direct, safe and comfortable, especially when it comes road direction and allocation. For example the proposed cycling corridor between Mosta and University starts from nowhere, rather than Mosta centre, and takes the cyclists along a long detour to reach University. This will result in cyclists not using the proposed “safe” network in order to reach University quicker. Human behaviour dictates that shortcuts are a preferred option, and the proposed route will not provide safety and convenience to its users.



## Space Priorities

The strategy(cf designs highlighted in pages 88/89) proposes the taking away of pedestrian space for cyclists, rather than vehicular space. This goes against the strategy’s own objective for Malta to become a walking and cycling nation.

The strategy fails to adopt a framework which puts pedestrians at the top of road transport hierarchy, followed by cyclists and public transport. A nation with the ambition to become a haven for walking or cycling requires the prioritisation of alternative transport over the use of private cars.





## Conclusion

While it is positive to see that cycling in Malta is getting more attention as a sustainable means of transport, we must ensure that this is done right and overseen by competent persons and bodies in the field.

The fact that no consultation has been made with local stakeholders, including us as the Bicycle Advocacy Group, prior to the launch of this document, does not augur well. Hence, this document has given the impression that it was written by people without prior knowledge of cycling as a means of transport, the challenges we cyclo-commuters face, and the appropriate action to make cycling a more attractive choice.

It is highly recommended that this strategy document is rewritten to incorporate feedback from experts in the subject and bicycle commuters who on a daily basis experience the realities of cycling in Malta.