



## Response to consultation on the National Cycling Strategy

In collaboration, three local NGOs - Rota, Friends of the Earth Malta, and Moviment Graffiti - have prepared the below response to the National Cycling Strategy consultation document.

### General Feedback

While the document contains several good measures, the scope and depth of the document is not proportional to the years spent working on developing a National Cycling Strategy / Policy. We find ourselves very disappointed that after all this time, all we got was a 25-page slideshow. This does not reflect neither the need nor the urgency with which a serious National Cycling Strategy needs to be drafted, finalised and implemented. The Transport Master Plan for 2025, published in 2016, proposed a National Cycling Policy, including two pilot cycling corridors. Seven years later, this still has not materialised. Five years have passed since the first attempt to publish a National Cycling Strategy (draft published in 2018). Since then, ongoing roadworks, wider and larger roads and roundabouts, an ever-increasing stock of cars, and a lack of road enforcement have made cycling more difficult and dangerous. The cycling infrastructure that has been introduced is not connected, not designed and built according to any published standards and not always enforced and maintained (e.g. debris and overgrowth on paths, illegal parking, lifts not functioning), while at the same time routes lost by new barriers remain actively cropping up everywhere. Bicycle sharing was introduced in Malta in late 2016, but the main operator has since closed down due to a lack of safe infrastructure and, therefore low uptake of the mode.

The measures to introduce low-speed zones in urban areas, cycle lane design standards and a hierarchy of road users - if properly implemented - have the potential to make cycling a safe and convenient way to get around in Malta. The strategy is let down by its vague and passive wording in places, with too much calling for further studies instead of setting realistic targets for delivery. Its focus is almost entirely on the short-term, and there is no convincing plan to ensure compliance or assure quality, not helped by the absence of Key Performance Indicators to measure progress and evaluate impact. The measures do not cohere with one another to achieve particular targets, e.g. a modal share of 6% by 2030. Without targets, progress cannot be measured.

Announcing the decision to ban shared e-scooters alongside the news of these measures for the National Cycling Strategy is a missed opportunity. If the government had seen the opportunity to provide safe and suitable infrastructure for micro-mobility, which includes all sorts of small personal (electric) devices, such as bicycles and scooters, the promotion of

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these modes of transport could have gone hand-in-hand. This could have been in the form of dedicated parking spots for bicycles and scooters, protected lanes and traffic calm zones to be used by all micro-mobility modes, and a connected network to use these modes of transport safely.

## Point-by-point feedback

### 1. Infrastructure and Bicycles

#### 1.1. Connected network of cycling routes

This is a welcome measure. As the map of existing cycling infrastructure in Malta shows, it is not a network. The study should acknowledge past failures in new infrastructure to avoid severing walking and cycling routes. The Ministry should adopt standards and guidelines for cycling infrastructure, to ensure the investment goes towards a high quality network that is safe, direct, connected, comfortable and attractive. The Ministry should introduce legislation and guidelines on the application of cycling contraflows - common practice in one-way streets in many cities - to enable more direct and connected cycling infrastructure. Design standards (1.5, 1.7 and 1.10), when properly enforced, will prevent poor designs like the Msida Creek flyover (indirect cycling connections, severance, shared space with pedestrians) from making it off the drawing board. The network must integrate clear signage for wayfinding. Cycling infrastructure needs to enable safe passage in both directions, with safe crossings and clear sight lines. At junctions, all possible origins and destinations should be considered when designing the network.

Questions:

- What is the budget and what is the timescale for delivering the NCRN?
- How will the Ministry ensure the integration of the NCRN with other projects and initiatives? An idea that was mentioned in the 2018 draft National Cycling Strategy was the setting up of a roundtable including different relevant governmental departments as well as civil society groups, to ensure there is consultation and coordination.
- How will the Ministry ensure that all these related initiatives (Slow Streets, SUMP, now cycling network) will be implemented?

Action - Rota is happy to support the 6 month study by sharing its list of 'quick win' cycle junction improvements to create a backstreet quiet network, while the main street cycle network is constructed.

#### 1.2 GIS platforms

This is a sensible, low cost and relatively easy to implement measure. In fact, some applications such as Komoot already offer the ability to plan relatively better cycling journeys in Malta. However the persistent lack of crossings wherever a main road cuts a quiet road,

and the lack of contraflows in selected one-way streets, still result in unnecessary car-centric routes in some areas that can be solved with the interventions mentioned earlier.

We recommend to integrate and build on existing GIS and map-based resources prepared by other stakeholders in Malta, such as the routes developed and shared via the totems installed as part of the [Nudging Active Travel project](#) of the Institute for Climate Change and Sustainable Development of University of Malta, the [KSU Safe Cycleways Map](#), and the routes shared on the [Rota website](#).

It is important that funding is allocated to the maintenance and upgrading of this platform, to ensure the information remains accessible and usable over time.

### **1.3 Temporary Traffic Management**

It is difficult to understand what this measure proposes. It is concerning that the current law to carry out a safety audit at construction projects is not being enforced for cycling. We propose that the ministry saves itself the expense of another study and adopts international best practice, such as [Transport for London's](#) or the [CROW principles](#).

### **1.4 New developments by the Planning Authority**

This measure is not clear or specific. A more ambitious strategy would be to make it explicit that new developments would only gain approval where they demonstrate how they cater for cycling, through parking and safe infrastructure. The Ministry should issue guidance which sets out minimum design standards for new developments, including the type and amount of bicycle parking, and other facilities, in relation to the size and type of development. It is important to note that there is a wide spectrum of bicycle types, not just the conventional bicycle but also cargo bikes, tandems, and disabled-friendly and for the elderly, which can be more difficult or impossible to handle for some individuals without proper bike parking design guidelines.

### **1.5 Minimum standards to address cycling mobility needs**

The wording of this measure does not correspond with its substance, but we agree that employers should be required to provide safe bicycle parking, showers and changing facilities.

### **1.6 Standardised repair jobs**

This is not a priority measure. Cycling, compared to driving, is very inexpensive and does not require taxpayer-funded state subsidies to keep costs down. A better alternative would be for the Ministry to offer a grant to local councils to install public bike repair stands, like the one at the University of Malta quadrangle, and more recent ones at Ғaḏ-Ḑebbuḡ and Ḑurrieq

### **1.7 Cycling considerations in SUMPS and SULPs**

This measure is not very ambitious. Modal shift to cycling will be essential to making the transport mix more sustainable. This strategy should set targets for proportions of journeys made by cycling by 2030 - as a minimum, 6%.

### **1.8 Incentives for pedelecs (e-bikes)**

We agree that the current administrative barriers to receiving the pedelec grant put people off applying. The grant should broaden its cargo bike criteria, allowing for lower carrying capacities (50-70kg range) and its process simplified. In order to address inequality, the Ministry should offer a direct discount at the point the pedelec is bought.

### **1.9 Cargo Bikes and E-Cargo Bikes**

This measure is so vague as to be meaningless. The Ministry should save itself the trouble and learn from international best practice, such as the [TfL cargo bike action plan](#).

This 'investigation' should consider and acknowledge the impact of using bridges and lifts as the only possible connections for cyclists (e.g. in Marsa), which can only handle 1 conventional bicycle at a time and are impossible to use with a cargo bike as they do not fit. This is ironic, as they are found adjacent to the widest roads and flyover junctions in the island

### **1.10 Cycle lane design**

The introduction of enforceable cycle lane design standards will be a game changer for Malta, where for too long substandard designs have been built. There is no need to reinvent the wheel, and the Ministry should adopt a set of respected cycling infrastructure design standards and guidelines. We recommend the [CROW design guidelines](#). However, we are concerned by the inclusion of 'advisory cycle lanes marked with a broken white line'. Other countries are moving away from painted lanes because studies show that they are more dangerous for cyclists than no infrastructure, because they provide drivers with the illusion of full segregation. They should only be used in narrow roads with low levels of car traffic to indicate a contraflow lane. Many main roads have ample room for well-thought bicycle infrastructure through road dieting measures, by narrowing down oversized lanes up to modern city standards and oftentimes not needing to remove the number of lanes.

The Ministry should audit all cycling infrastructure (cycling paths/lanes, crossings) to identify where improvements are needed to ensure adequate widths, safe crossings and green infrastructure to provide shade and mitigate noise and air pollution.

### **1.11 Cycling Monitoring Units**

This is a sound measure. Better data on cycling and active mobility should feature more in this strategy. Data should be made available publicly and be open access. The Ministry should consider procuring or developing a [propensity to cycle](#) tool.

## **2. Cycling and Public Transport**

### **2.1 Cycling to Public Transport - First Mile Cycling**

The strategy's focus on 'first-mile' and 'last-mile' cycling seems misplaced. It takes around 6 minutes to cycle a mile (1.6km), and most journeys in Malta are under 5km (15-20 minutes). Given the length of most journeys in Malta, the vast majority of people cycling will choose to cycle their entire journeys, rather than wait for a bus. Additionally, bus commuters would find

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themselves cramped to accommodate bikes, especially if such bikes are pedelecs which are often larger and heavier. We strongly feel this does not apply to Malta except for long trips, such as the express (X) bus routes from Ċirkewwa to the airport and Valletta.

This concept makes more sense in countries with rail networks. A better focus would be to provide ample secure bike parking at important hubs, including key bus interchanges and ferry landing sites.

## **2.2 Public Transport to Cycling - Last Mile Cycling**

As above, this measure does not strike us as a high priority. The recommendation to make a case for bike sharing services is hidden within it, and somewhat inconsistent with the current policy to ban rental e-scooters. A more pressing measure would be for the Ministry to commit to working with industry to bring back bike sharing schemes to the islands.

## **2.3 Public Transport and Cycling - Bikes on Buses**

We welcome this measure, and would like timelines on when MPT and the Ministry will complete their joint assessment. This would make particular sense on bus routes connecting to the airport and ports. Related to this measure, the Ministry should clarify rules on taking electric bikes and e-scooters onto ferries. Ideally, the Ministry will make it a condition of future contracts for operators to allow electric bikes and scooters onto ferries.

# **3. Rules & Safety**

## **3.1 Responsibilities of larger vehicles**

This measure's title underplays two very important actions that will make cycling safer in Malta. One, establishing a clear and enforceable rule on close passing. Two, legislating for a hierarchy of road users.

To promote road safety for vulnerable road users, including cyclists, sharing the road where vehicle speeds are higher than 30 km/h is not recommended. Any road where the speed limit is over 30 km/h should have segregated cycling infrastructure, provide an alternative safe connection for cycling, and/or when not possible then reduce vehicle speeds to 30 km/h or less. The proposed cycling network should seek to eliminate potential conflict between heavy vehicles and vulnerable road users. Legislation should be amended to protect vulnerable road users (further elaborated under the point on 'presumed liability' in point 3.5).

Strictly on the topic of large vehicle safety, the Ministry should look to learn from TfL's ['direct vision standard'](#) for Heavy Goods Vehicles.

## **3.2 Safety of cycling and micro mobility**

This is another oddly titled measure, where it does not correspond with its content. Other cities and countries have introduced 30km/h speed limits by default in urban residential areas (Wales and Amsterdam), because car accidents at this speed are much less likely to injure or kill vulnerable road users.. Malta should adopt the same approach rather than a piece-meal, street-by-street one. Going forward, when minor streets in residential areas are resurfaced, they should be redesigned for 30 km/h speeds (narrower lanes, wider

pavements, junction build outs). Where roads are shared between cars and vulnerable road users, traffic calming measures need to be applied, which slow down vehicles through design, not only by means of speed limit signs, e.g. through horizontal or vertical deflection, such as speed tables, chicanes, pelican crossings, and urban furniture and greenery.

### **3.3 Speed limits to protect cyclists**

This measure seems to largely duplicate 3.2, with the added mention of the vital Slow Streets plan. The cycling strategy should emphasise the importance of local and national government working together to deliver these plans, ensuring joint accountability and avoiding bureaucratic bottlenecks.

### **3.4 Update to national legislation**

There is next to no detail in this measure, making it hard to respond. However, we are extremely concerned by the six words ‘helmet usage will also be regulated’. Around the world, the countries and cities which are safest for cycling have the lowest rates of helmet wearing. That is because they focus on safe infrastructure rather than making the vulnerable road user responsible for avoiding injury from much larger, more dangerous vehicles. We are not saying people should not be wearing helmets, but that it is up to each individual’s personal choice. Compulsory helmet laws deter people from cycling and encourage dangerous driving, as what happened in Australia where it was made compulsory. The practical logistics of mandatory helmets is also unclear when it comes to hopping on a nearby bike-sharing service.

Legislation to promote safety for vulnerable road users needs to include ‘presumed liability’, legislation that determines who is at fault when an accident occurs, finding the more powerful road user liable by default, as they should carry greater responsibility. Currently, this is not clear and usually leaves the more vulnerable road user to search for compensation for damages. Malta is one of only four countries in the EU, alongside Cyprus, Romania and Ireland, without presumed liability. With the exception of Romania, all are past colonies of the United Kingdom which also does not hold presumed liability.

Legislation enshrining the hierarchy of road users (mentioned in 3.1) and banning pavement parking for cars will be far more effective in making the cycling strategy a success.

Malta should update its Highway Code, as it has remained unchanged since 1999. The highway codes of many countries have been updated in the last decade to reflect changes in mobility patterns and modes. Malta’s highway code is based on the UK’s – meanwhile the UK updated theirs in 2021. The highway code can be used to signal needed change in the behaviour of motorised traffic toward non-motorised traffic. A Highway Code update should include regulations such as a 1.5m minimum passing distance, the new hierarchy of road users, and new rules for giving way to vulnerable road users, taking inspiration from the New Highway Code adopted in the UK.

### **3.5 The safety bubble**

The graphic above this measure implies this will be about setting a minimum passing distance between cyclists and drivers. In many countries, this is set at a minimum passing

distance of 1.5m. This measure should also encompass the rules for streets in which it is too narrow for drivers to safely overtake cyclists, where the obligation should be for drivers to wait behind the cyclists until it is safe to pass.

### **3.6 Infrastructure inspection and audit checklist**

We are unclear what a 'cyclability audit' is, but we welcome an audit checklist and regular inspections of sub-standard infrastructure, with the powers to enforce penalties if the recommendations are not implemented. This measure should be considered in parallel with the road accident investigation body that is being set up.

### **3.7 Residential and Urban Safe Route Network**

This is a very welcome measure, and as civil society organisations with many members who cycle, we are eager to support this measure. We are unclear on what '*speed limits in the Safe Route Network would be calibrated with the speed of all road users*' means. If it falls under 3.2 and 3.3, then the recommendation should clearly be that speed limits should be 30km/h in streets where cyclists are expected to share road space with cars, implemented not only via speed limit signage but also through changed street design, to guide behaviour. Any streets with a higher speed limit must have segregated cycling infrastructure.

### **3.8 Intelligent cat's eyes**

This is not a high priority measure. Painted cycle lanes or lanes demarcated by cat's eyes are not safe. The Ministry should focus on full segregation either through kerbs, barriers, planting or bollards.

## **4. Information and Awareness**

### **4.1 Cycling in Green Travel Plans**

This measure is mealy-mouthed and combines 'Green Travel Plans' with bike sharing services in industrial estates. The language of 'develop incentives for the introduction of [...]' is non-committal. It is not clear to which 'entities' the measure is referring. Filling in the gaps, if this measure results in a target for business and public bodies to incentivise their employees to travel to work by sustainable means, that is good.

### **4.2 and 4.3 Training programmes for adults and children**

This is a sensible and long-overdue measure, especially for children. Collaboration should include cycling clubs and civil society organisations such as our NGOs.

### **4.4 Safe cycling routes to schools**

This is a good measure. This is the second mention of 'Green Travel Plans' without an explanation of what it means. There should be a target for all schools to have bike parking, rather than the unambitious 'where possible'. No school in Malta should ban its students from travelling there by bike or scooter.

### **4.5 Information repository for cyclists**

This is the bare minimum.

#### **4.6 National Cycling Route Network display**

This measure is not clear, it does not specify what type of information will be displayed or where. If it means creating, alongside the GIS measure, displays or totems that show maps of cycling routes, that is good.

#### **4.7 Cycling awareness raising campaign**

We do not understand what this recommendation entails - '*clearing other vehicles*'. Once the Ministry updates the highway code to codify the hierarchy of road users and minimum passing distance, the Ministry should launch a campaign to make drivers aware of their new obligations to protect vulnerable road users, and then begin enforcing those rules.

#### **4.8 Promotional cycling campaigns**

This is welcome but it is not clear how it would work in tandem with the appointment of travel managers to 'entities', and other measures to increase cycling's modal share in this strategy. The Ministry should be transparent about its metrics in defining specific target areas.

#### **4.9 and 4.10 Promotion of awareness of the change in legislation**

Updating the Highway Code is an important measure and should be explained more prominently. By updating the Highway Code, the new protections for cyclists become enforceable. Not only should the Ministry promote the new codes and legislation for road use, but the Ministry should commit to enforcing those rules.