



Cyclist.ie - The Irish Cycling
Advocacy Network
An Taisce
Dublin Cycling Campaign

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2015-2020 DLR Draft Road Safety Plan

Dear Sir/Madam,

I wish to make a submission in regard to the draft Road Safety Plan 2015-2020.

This submission is being made by the National Cycling Coordinator for An Taisce and Cyclist.ie, a position funded by the European Cyclists' Federation (www.ecf.com) and on behalf of Dublin Cycling Campaign.

Overall we broadly welcome the plan but we think the proposed actions could go *much further* to make the public roads of Dun Laoghaire Rathdown (DLR) County a safe place in which to cycle and walk - both in terms of absolute collision and (serious) casualty numbers but also in terms of *how safe they feel*. Feedback from members of Dublin Cycling Campaign living and working in the County strongly suggest that the public roads are a long way off feeling safe for many people and especially children. Road conditions need to change significantly if the government National Cycle Policy Framework target of 10% of trips to be taken by bike by 2020 (Department of Transport, 2009) is to be achieved. Of course, a 10% national target really means that Local Authorities in Dublin such as DLRCC need to go much further - i.e. achieve modal shares of 15-20% by bike by 2020.

More specific comments/suggestions are made below.

Specific Comments

- The report sub-title / 'strap-line' is called "Working together to reduce casualty numbers". We feel that this 'strap-line' is insufficiently broad and not ambitious enough. We suggest that the strap-line needs to convey the idea that DLRCC is striving to make the County *feel* safe and inviting, and not just have lower casualty numbers. What about "Working together to create a county that is and feels safe in which to move about"?
- Section 2.3, page 3. The text states that "the level of under reporting of collisions is unknown". We do know from a recent study by Sheridan et al. (2011) – entitled "Admission to Acute Hospitals for Injuries as a Result of Road Traffic Collisions in Ireland, 2005-2009" – that cycle collisions are unreported by a factor of ten. They state the following (on page 5): "[i]n particular, the number of cyclists injured is under-estimated in the RSA figures; with 1,050 cyclists admitted to hospital. However, over the same period, just 109 serious injuries among cyclists were reported by the RSA." (p5). It is essential that DLRCC conduct or commission research to find out the difference in collision data between hospital and Garda records for the County and that a differentiation is made between road traffic casualties and those arising from bicycle crashes in races and while out training etc.
- Section 3.3 (page 7). The report states that that "[t]he basic assumption in this [RSA 2013 to 2020] Strategy is that the objectives can be achieved, without fundamentally changing our mobility system, and within the budgets set aside for the purpose". We would argue that the system *does need fundamental change* so as to achieve the NCPF targets referred to above. Without fundamental change, obesity levels will continue to rise with increasingly negative public health outcomes.
- Section 4.1 (page 9). We welcome the explicit naming of Dublin Cycling Campaign as a proposed member of the Road Safety Plan Working Group. We wish to make the point however that as a fully voluntary organisation, we are very stretched securing our members'/volunteers' time to attend (day-time) meetings. It is essential that this Working Group is not a 'talking shop' and we are conscious also of possible overlaps with the work of the Transport Strategic Policy Committee, and the Cycle and Pedestrian Forum. In essence, it is essential that any new committees formed have meaningful powers so as to make the best use of volunteers' time.
- Section 5.1 (page 12). We suggest replacing the existing text of:
 - "The main objective in the Road Safety Plan is to reduce the number of collisions and casualties on the roads of Dún Laoghaire - Rathdown County Council in line with National targets and to provide focus on making roads in the County a safer place for all road users." With:
 - "The main objective in the Road Safety Plan is to reduce the number of collisions and casualties on the roads of Dún Laoghaire - Rathdown County Council in line with National targets and to make the roads in the County a safer place for all road users in absolute terms but also in terms of how they feel.

- Section 5.3 (page 13). Final paragraph and Table 5.1. The text and table need to be amended so as *not* to give the impression that there is a target of 6 fatalities for 2020!
- Section 5.3 (page 13). Table 5.1. As regards setting targets for minor injuries, these would appear to be additional to RSA requirements. The focus here must be on reducing killed and serious injuries and therefore with an emphasis on reducing speed limits, speeding and dangerous overtaking. We do not think it is necessary to have a target for minor injuries.
- Section 6.2, Table 6.2. Education needs to focus heavily on the drivers of vehicles with masses of 1000-2000+Kg, not the vulnerable road users. Campaigns to protect vulnerable road users should focus on getting drivers to slow down and give pedestrians and cyclists space. More broadly, the weight of policing and traffic management efforts to make cycling a safe and normal part of everyday life – as it is in much of Northern Europe – needs to shift substantially from seeking to control the cyclist to managing the physical hazards which generate the death and injury in the first place. In safety engineering parlance, this is known as applying the hierarchy of risk management controls: the most effective interventions involve physically removing the hazard, while the least effective leave the hazard untouched and concentrate on providing personal protective equipment to the more vulnerable.
- Section 6.2, Table 6.2. Item vii - Inappropriate Parking.
 - This action needs to go beyond ‘near schools or at School Zones’. It needs to include all routes/zones in which there is illegal/inappropriate parking.
 - There needs to be a special focus on preventing fly parking in cycle lanes and on footpaths. See here Dublin Cycling Campaign’s Twitter campaign: #FreeTheCycleLanes.
- Section 6.2, Table 6.2. Item vi. - National Bike Week (NBW). The priority needs to be on promoting cycling and not to ‘dangerize’ the activity by over emphasising high viz and helmets - as has been the case in recent years.
- Section 6.2, Table 6.2. Item vii - Cycle Training Standard. It is essential this is addressed / accelerated as a matter of urgency!
- Section 6.3, Table 6.4. Item i. Speed Limit Reviews.
 - 30kph zones need to be introduced around *every school in the County*.
 - There also needs to be 30kph speed limits at shopping and business districts and even short linker roads between these key areas.
 - We are conscious that the percentage of cars exceeding the speed limit on urban arterial roads (in 50km/h zones) was 77% in 2011, as per the RSA speed surveys (Road Safety Authority, 2012). This is at the heart of the problem in roads feeling unsafe for those wishing to cycle.
- Section 6.3, Table 6.4. Item iii. ITS - Traffic Signals.
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- There needs to be a serious effort to introduce 'pre-greens' for cyclists at key junctions in the County. This needs to happen in the context of the Gardai dealing with cars continuously encroaching into cycle boxes / advanced stop lines etc. See below.
 - There also needs to be a serious attempt to reduce the cycle times for pedestrian crossings. We are reminded here that it is over 13 years since Dublin Cycling Campaign sent in a detailed submission in regard to the pedestrian/cycle unfriendliness of the Dundrum bypass / Taney Road junction (<http://www.dublincycling.ie/cycling/archives-2002-campaign-submission-dundrum-bypass>) (Dublin Cycling Campaign, 2002) – but still the cycle times for pedestrians (crossing from Dundrum Library across towards the old Shopping Centre) are still ridiculously long - and many pedestrians take their chances here. This is unacceptable.
- Section 6.3, Table 6.4. Additional items.
 - Good engineering design is essential to protect vulnerable road users. Design guides behaviour so good design can actually prevent many accidents. Also physical barriers e.g. curbing, are hugely important in protecting cyclists and pedestrians from vehicles.

Conclusion

In order to make DLR County a much more attractive and safer place to walk and cycle, there needs to be a much greater emphasis on lowering motor traffic speeds and improving the quality of the infrastructure. We look forward to seeing a greatly enhanced Road Safety Plan for the County soon.

Yours faithfully,

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References

- DEPARTMENT OF TRANSPORT 2009. National Cycle Policy Framework. Dublin, Ireland: Department of Transport.
- DUBLIN CYCLING CAMPAIGN 2002. A Report on the New Junction at Dundrum Bypass - Dundrum Road - Taney Road - Upper Churchtown Road. "A Dangerous Design for Cyclists".
- ROAD SAFETY AUTHORITY 2012. Free Speed Survey 2011 (Urban and Rural).
- SHERIDAN, A., HOWELL, F., MCKEOWN, N. & BEDFORD, D. 2011. Admission to Acute Hospitals for Injuries as a Result of Road Traffic Collisions in Ireland, 2005-2009.