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DRAFT BICYCLE STRATEGY for Northern Ireland

Dear Ms. Burke,

This submission is being made through the work of the National Cycling Coordinator on behalf of Cyclist.ie - The Irish (all-island) Cycling Advocacy Network, a new position funded through the European Cyclists' Federation's Leadership Programme 2014-15 [1].

We welcome the opportunity to provide input into the finalising of the Bicycle Strategy for Northern Ireland and the Delivery Plan. Overall, we commend the Department for Regional Development (DRD) on the initiative of developing a long-overdue Bicycle Strategy for NI.

We are particularly happy to see that the bicycle is being thought of as an essential, yet completely normal, part of a modern transport system. We fully expect that as the years and decades pass – and as fossil energy supplies become scarcer and more disrupted – the role of the bicycle in providing an affordable and resilient means of transport will only increase. This increase is however also contingent on fostering the development of a strong cycling culture in this present decade and shifting away from the car-centric policies that have dominated for many years.

The comments below follow the numbering and structure of the Draft Strategy.

2. Our Cycling Future

2.1 VISION

- We commend the broad scope of the vision to encompass the development of strong cycling cultures, communities and society in NI and that the bicycle is seen as another perfectly valid transport mode given parity-of-esteem with motorised transportation.

- We note that the high level Bicycle Strategy will be followed up by “a Bicycle Strategy Delivery Plan” which will outline specific, measurable, achievable, realistic and time bound objectives, policies and actions.” However it is essential that that Plan will include funding commitments and time-lines as well.

2.3 MAKING THE CONNECTIONS

- We applaud the references to multi-departmental and multi-public body responsibility for implementing the strategy. Having said, that there also needs to be a *very well resourced* Bicycle Unit within the Department for Regional Development (DRD) which can effectively coordinate the implementation of the strategy. Without a strong team in place here (and we note that the DRD now has a Bicycle Unit), the implementation could end up being slow and fragmented. A well resourced and trained cycling team embedded within the transport division is vitally important given the multiple layers of policies, plans and other instruments that are used in transport and development planning in Northern Ireland (e.g. road safety strategies, master-plans, transport assessments... etc.) and which need to be ‘bicycle proofed’ systematically.
- Benefits of cycling [p8]. Yes, we strongly agree!

3. Background / 3 Pillars

- Perhaps it can be clarified how the “3 pillar approach” ties in with the “4 elements of chapter 4”?

4. Moving Towards Our Vision

4.1 A COMPREHENSIVE NETWORK FOR THE BICYCLE

- We would welcome a statement to the effect that there is currently a joined-up comprehensive integrated network in NI and NI cities for cycling: the road network. The strategy needs to engage seriously with the idea that this network as a whole (barring motorways) needs to be bicycle-friendly, and not only the very limited numbers of ‘cycling routes’ which will come into being only after, first of all, masterplans have been developed and then after specific proposals have been advanced. The road network (barring motorways) is there for everyone to use and it needs to be tamed so as to be safe and attractive for bicycles. It is utterly iniquitous that the existing road network is perceived to be hostile for cycling for all but the most battle-hardened cyclists!
- [p12] “Since 2002 the Department has invested over £10 million in the development and expansion of cycle lanes and on cycling infrastructure measures.” This works out as less than £1M/year. Given that the all road public expenditure on NI roads for the year 2013-14 was £436M [2], this means that less than 0.25% of the roads budget is going towards cycling infrastructure. To begin to emulate the cycling provision in high cycling countries, approx 10% of the transport budget needs to be spent on cycling. There needs to be paradigm shift away from providing for the car. Otherwise no cycling culture/community/society will emerge. Politicians as well as administrators have to grasp this reality. We ask: Do they?

4.2 SAFE SPACES FOR THE BICYCLE

- [p15] Re: point 4.2.1 that “[w]e plan to develop new, best practice design guidance which will be used by those designing for cycling”, surely there is existing UK design guidance that can be used here instead of reinventing the proverbial wheel!? See for example the array of publications on the website of the Institution of Civil Engineers [3].
- [p16] Is it really necessary to differentiate between the “fast commuter” and the “experienced utility cyclist”? Ultimately, cycle provision in any given location should aim to meet all of cyclists’ needs. As Jan Gehl and Gil Penalosa puts it we have to cater for the 8-80 age range in cycling provision on our roads in traffic [4].
- [p17] 4.2.4 Respect and Understanding. This section is crucial and needs to be given more prominence in the report. More specifically, it is crucial that driving training instructors and the PSNI fully understand the nature of cycling and correct road positioning, and can communicate that message to their trainees and officers, respectively. This is explained well in film by the Bicycle Association as reported on in the media just last week [5].
- [p20] 4.4.1 Traffic calming. The draft strategy states that “[w]e are keen to explore creative and innovative traffic calming ideas and pilot these in appropriate locations”. It then goes on to say that “[t]o date around five hundred 20mph zones have been introduced”. It would appear therefore that there has already been a considerable number of (pilot) projects implemented; the draft strategy needs to be much more ambitious in regard to this crucial policy strand in seeking to make all built up areas traffic calmed, and safe and attractive for bicycle users of all ages (i.e. 8 to 80) and abilities. Unless there is a serious shift in policy towards making places liveable and attractive and “inviting for all” (as per the opening paragraphs in section 4.4) by reducing speeds on a widespread basis, there will be no cyclists left on Northern Irish roads! It is already under 1% of journeys [6] and we strongly suspect that this is because of the cyclist-hostile nature of many of NI’s road with the excessive emphasis on motorised-vehicle free-flow at the expense of safety and perceived safety for more vulnerable road users. Figure 1 below appears in the RoI Design Manual for Urban Streets and Roads [7]. It is essential that an equivalent image is included in and informs the new Bicycle Strategy.

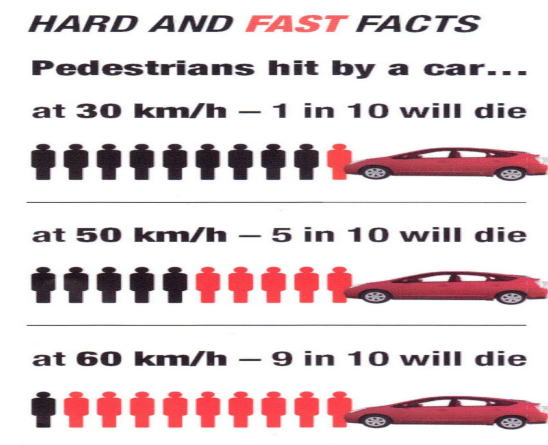


Figure 1 – Outcomes from Car Impacts with Pedestrians as a function of speed

5. Measuring Success

- We welcome the intention for the Delivery Plan to “contain a series of specific, measurable, achievable, realistic and time bound objectives, policies and actions”. However it is essential that the delivery plan also contains funding commitments. Overall, provision for cycling should amount to 10% of the overall transport budget.
- We strongly disagree with the decision “not to set an arbitrary Northern Ireland wide target for the percentage of people cycling by a nominal date as we do not think it will be useful in encouraging people to use the bicycle as a mode of transport at local level”. There must be targets both at an overarching NI level and local levels. The purpose of targets must be to encourage professional policy-makers and practitioners to reflect on and assess the impact of a NI wide cycling strategy, as is being currently drafted. Targets are not necessarily directed at individual members of the public as the above quote suggests.
- Given the urgency for NI to reduce its carbon emissions and develop a resilient transport system that is not completely reliant of fossil energy sources, it is essential that ambitious targets are developed for NI and local levels and that these are used a tool to motivate action.

Final Points

- While the historical photographs of the masses of bicycle users adds nicely to the mixture of images in the report, perhaps it is not necessary to include them repeatedly in the final version since it may lead to the suggestion that bicycles belong in some way to the past.
- Moreover, it would enhance the final document further if there were more images of bicycle users in ordinary clothes cycling along streets *without special cycling facilities* so as to stress the point that the bicycle is indeed a normal part of the transport and road systems. Drivers should expect to find bicycles being ridden *on all roads* (bar motorways). The image on the front cover is very inclusive and positive.
- The final Bicycle Strategy needs to include as an objective support for the development of the Euro-Velo’s Atlantic Coastal Route (EV#’1) which runs through Northern Ireland linking Scotland with Donegal and south into Sligo and Mayo..... and on to Spain. See Figure 2 below. These EV routes will form the backbone of cycling tourism development plans in all countries in Europe over the coming years [8].
- The final Bicycle Strategy needs to include detailed objectives relating to public bikes. The *Dublin Bikes* public bike system has helped to normalise everyday cycling in Dublin since its launch in 2009. It now has approx 50,000 annual subscribers and has expanded to 1,500 bikes at approx 110 stations [9], with further plans to bring the figure to 5,000 bikes over the coming years [10]. It is understood that the Belfast public bike scheme will open in early 2015.
- In developing the final version of the bicycle strategy, we strongly recommend that the DRD refer to the (RoI) National Cycle Policy Framework (NCPF) [11] in setting out the final policy objectives.

In particular, we refer to the following statement (page 7 of the NCPF):

Criteria for Success

*The most important factors in ensuring that an NCPF is successful are as follows:
The participation of many stakeholders across several government departments,
many agencies, all local authorities and other non-governmental organisations and
institutions.*

Appropriate levels of, and timely, funding for the initiatives.

The knowledge and human resources available to implement the policies.

Legislation and Enforcement.

To this list we would add political commitment.



Figure 2 – Euro-velo Network. Euro-velo Route #1 “Atlantic Coast” runs from Scandinavia to the Algarve via Northern Ireland [8]

Cyclist.ie trusts that our comments will assist the DRD in producing an ambitious and inspiring Bicycle Strategy for Northern Ireland.

Yours sincerely,

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Cyclist.ie / An Taisce National Cycling Coordinator

REFERENCES

1. ECF. *European Cyclists' Federation (ECF) Leadership Programme*. 2014 18/June 2014]; Available from: <http://www.ecf.com/leadership-programme/>.
2. Department for Regional Development, *Northern Ireland Transport Statistics 2013-14*. 2014.
3. Institution of Civil Engineers. *Infrastructure Design Guidance and Information*. 2014 19/Nov 2014]; Available from: <http://www.ice.org.uk/topics/transport/ICE-Transport-Policy/Cycling-and-Walking/Cycle-infrastructure-design-guidance>.
4. 8 - 80 Cities. *Home*. 2014 19/Nov 2014]; Available from: <http://www.8-80cities.org/>.
5. Walker, P., *The film teaching driving instructors to understand cyclists*, in *The Guardian*. 2014 <http://www.theguardian.com/environment/bike-blog/2014/nov/11/the-film-teaching-driving-instructors-to-understand-cyclists>.
6. Department for Regional Development, *Travel Survey for Northern Ireland Headline Report 2011-2013* 2013.
7. Department of Transport, T.a.S. and C.a.L.G. Department of Environment, *Design Manual for Urban Roads and Streets*. 2013.
8. European Cyclists' Federation. *Eurovelo - The European cycle route network* 2013 18/July 2013]; Available from: <http://www.eurovelo.com/en/images/eurovelo-map>.
9. Ginty, C. *DublinBikes nears 8m rentals as it turns 5*. 2014 29/Sept 2014]; Available from: <http://irishcycle.com/2014/09/12/dublinbikes-nears-8-million-trips-as-it-turns-5/>.
10. Dublin City Council, *dublinbikes Strategic Planning Framework 2011-2016*. 2011.
11. Department of Transport, *National Cycle Policy Framework*. 2009, Department of Transport.