



Transport & Mobility Forum

Road Safety Authority (RSA)

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Public Consultation – Response

Public consultation on Government's / RSA Road Safety Strategy 2021-2030 November 2020

Dear Sir/Madam,

The Transport and Mobility Forum, Cork (TMF) is a representative group of organisations who have a common interest in sustainable travel *. The TMF fully supports sustainable modes of travel measures and policies. Sustainable and Active Travel helps reduce congestion on roads, improve air quality, supports a low carbon economy, reduces noise pollution and improves public health.

We appreciate your recent correspondence confirming our status as stakeholders and look forward to developing a relationship henceforth. We also would like to thank Brian O'Connell and staff at Indecon consultancy for facilitating a meeting to discuss the strategy with us and gain our input. Following on from this meeting we would like to offer the below points in relation to the development of the new RSA Road Safety Strategy 2021-2030.

Awareness / Education

- (Early) Childhood Education: Whilst Road Safety is on the pre-primary, primary and post-primary school syllabi and there are resources in place regarding the delivery of road safety

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education such as RSA Officers, Gardai in schools, Road Safety Officers in Local Authorities, Cycle Training Framework and Certified Trainers and curriculum strands covering road safety at primary level, we propose a more standardised approach. Road Safety and Cycle Training must be compulsory and be provided to 100% of children of all abilities. Every child leaving primary school should have sufficient skills to walk and cycle safely in road traffic.

- Funding for more Streetscape mats for schools. The RSA should consider piloting a permanent Streetscape (mock-up mini city street network with all relevant features) with the aim of each region or county having one to visit and train in. This would ensure all children are taught road safety in an experiential way. Car Insurance companies may also consider co-funding such resources as they clearly have an interest in fewer accidents.
- Walkability Audits to be carried out by young people along their routes to school in order to highlight the risks from their perspective as well as it being an educational experience. The same should apply to cyclability.
- Road safety education for adults, including cycle safety training, should be promoted and facilitated through the RSA, in cooperation with e.g. Colleges, employers etc.
- Continued emphasis and use of public awareness campaigns e.g. campaigns focused on public health, needs of vulnerable road users, RSA to explain cyclists' behavior to drivers (e.g. they are in the middle of the lane in order not to get "doored"), impact of air and noise pollution from cars on public health ("green driving")
- A Green Driving initiative should be adopted
- Continuous Education for professional drivers – People who drive for work i.e. anyone with 'business class' insurance, should undergo re-training every 3 years.
- Environmental Psychologists and their research should be systematically included into the RSA's work to look into the 'push and pull' factors for walking, cycling and using public transport. The RSA needs to understand how many people are choosing their car over other modes out of safety concerns and how can the perception of safety be improved i.e. awareness campaign and/or infrastructure improvements. Research done by the TILDA team in Trinity College advise pedestrian crossing times at signalled junctions often need to be lengthened. This would help to compliment and broaden the perspectives of road engineers.

Forgiving Systems – Built Environment

- Streets should be designed for people not cars. The Hierarchy of Road Users as outlined in the Design Manual for Urban Roads and Streets (DMURS) should be applied to all new and existing roads and streets resulting in pedestrian priority first and cars last. Universal Design applied enabling road users of 'All Ages and Abilities' to safely walk and cycle. Interventions should be retrofit into existing roads and streets. Where high levels of walking and cycling exist, there needs to be some form segregation between both modes. The RSA should actively promote such approaches.
- The public realm in towns and villages must be enhanced to promote walking and cycling and facilitate more people communing outdoors in town centres. E.g. the re-design of Clonakilty town centre in Co. Cork by Senior Cork County Council Architect Giulia Vallone is a best practice example that can be applied to most Irish town centres.
- Any new road project or upgrade must be designed for all road users and all modes of transport. For example, the planned M20 from Limerick to Cork must be 'multi-modal'

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project with bus priority, access to bus and rail links and segregated cycle tracks included in the designs along the corridor (M20/former N20).

Traffic Speeds

- For many people who (will/want to) walk or cycle, high speeds of motor traffic in their immediate vicinity have a detrimental effect on their sense of safety and comfort. Particularly in urban areas with restricted street space, narrow footpaths etc, general speeds of 50km/h done by motor traffic can severely compromise people's perception of safety, can stop parents from letting their children walk to school, etc.
- Slower traffic speeds shall apply in general in residential areas, and in places with high footfall (near schools, in high streets, on primary walking routes with insufficient footpath width). The same applies to areas with high levels of cycling (access routes to schools, part of quiet routes, highly frequented routes where there is no space for cycle lanes) etc.

This should happen through:

1) Education:

- Raise awareness with drivers for needs of vulnerable road users, "slow down where needed for the safety of others"

- Make respect for vulnerable road users a basic element of driver (test) education. There is anecdotal evidence that driver test candidates are penalized if they drive too slow where higher speeds are allowed (e.g. in residential areas where 50km/h is allowed). It must be made clear that the speed limit is the UPPER LIMIT, not the speed to be aimed at. The above ("drive 50 where 50 is allowed") is by no means acceptable.

2) Traffic Management measures: the RSA should call for more 30km/h streets, with the aim to eventually establish 30km/h as default in towns and cities, with exceptions linked to clearly defined criteria

(3) Engineering guidelines: residential streets shall have a layout that supports slower speeds by design (design speed to be 30km/h), see also concept of "legible streets".

- TMF supports the Love30 campaign (<https://www.love30.ie/>): "The Love30 Campaign is supported by a group of organisations and individuals who believe that lower speed limits can make our towns and cities safer and more pleasant places to live, work and play."
- Maintenance: Increased funding towards maintenance of footpaths and cycle paths.
- Definition of selected Local (L) roads to be used for Active Travel providing a safe route for cycling and walking in and between each town and village

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- Quietways: There is an opportunity to investigate the potential for “quietway” cycling (and walking) routes as have been developed in the UK, US and the Netherlands. The quietway is separate from the busy traffic corridor, instead traversing through residential streets, through cycle permeable cul-de-sacs and laneways (filtered permeability). Safety is an unquestionable concern of many people when considering cycling or walking and such quietways could make these options more accessible for a wider demographic.
- In this context, it needs to be highlighted that e.g. cyclists are a very diverse population, with their behaviour in traffic highly dependent on their varying levels of abilities and confidence. A “one size fits all” approach when delivering cycling infrastructure cannot be successful when broader demographics shall be reached for a modal shift towards sustainable and active travel.

Engineering / Traffic Management

- (Sub)urban streets layouts should be made more permeable thereby making walking the quickest and safest way to travel for small distances. Existing pedestrian paths and ‘postman lanes’ should be reinvigorated to make them more appealing and valuable to the community thereby attracting more footfall which in itself provides surveillance deterring anti-social behaviour
- Safe Routes to School: All children should be able to safely walk or cycle to school independently (age and distance permitting). Further support to Green Schools should be provided to roll out more safer streets such as the school on Dublin’s Francis Street (<https://greenschoolsireland.org/dublins-first-school-zone-is-launched-at-francis-street-cbs/>)
- Age Friendly design principles, along with the needs of users with visual, hearing or mobility impairments and buggies must be integrated at very initial design stage.
- Working towards the elimination of wide sweeping junctions in urban areas which encourage sustained vehicular momentum and actively discourage pedestrian and cycle movement, and create significant danger for vulnerable road users
- In order to significantly reduce the number of HGVs driving through cities, towns and villages, a new vision for deliveries should be promoted whereby HGVs and delivery vans make drops to depots positions on the periphery of cities with EVs and cargo bikes doing the last mile deliveries
- Signalling - Facilitate and encourage Local Authorities to review signalling in their areas and adjust lights sequencing if deemed necessary such as lengthening crossing times for pedestrians in areas of high footfall or outside hospitals, etc. The RSA should review options to revise traffic signal designs (design of signal phases), e.g. by applying a Dutch style frequent 4-way green for cycling, walking, or parallel GREEN for general traffic and pedestrians in the same direction, where turning cars need to give way (as in many European countries). Extensive waiting times for pedestrians at signals provokes jay-walking and undermine road safety.
- Quick Interventions: Adopt a ‘Vision Zero’ approach to how traffic accidents are dealt with whereby Gardai submit a report to the relevant local authority which outlines the cause of the accident. Engineers are facilitated to make an assessment and apply safety interventions if necessary within 6 weeks of the original accident. Clearly swift action is needed to prevent

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future accidents. Therefore, funding should be readily available for such interim engineering works to be rolled out rapidly, bypassing the usual lengthy Part 8 public consultation and procurement processes at a first stage. Similarly if areas are deemed 'accident black spots', the local authorities are facilitated to do works to improve safety in the short term. Staff capabilities and resources will need to be bolstered to enable local authorities to carry out such works themselves including a stock of materials such as bollards and training for staff to carry out such works. An alternative would be to have a private building contractor on a 'rolling contract' type set-up.

Enforcement

- Increased funding for Gardai and traffic wardens to enforce traffic (e.g. speed) and parking violations. Enhanced training and powers for traffic wardens to enforce all aspects of the law governing speeding, illegal parking, violating bus priority lanes, cycle lanes, etc. The culture of 'I won't get penalised anyway' has to stop. Illegal parking must be highlighted with its consequences esp. for mobility impaired. Drivers that park illegally will force others to bring themselves in danger. This must be highlighted to the public.
- Limit movements of HGVs in cities, towns and villages.
- Safety Audits of new/upgraded infrastructure (carried out usually by the TII) should include 'all ages and abilities' and 'Universal Design' standards.

Data Gathering and Statistics

- Statistics, Data gathering: Published data mostly concentrates on accidents with fatalities or severe injuries. Other accidents appear to be under the radar in publications. There is very little distinction in data given between types of accidents, what road users were killed or injured, etc.

Safety / accident statistics must be published regarding the following:

WHERE accidents occurred (urban, rural, motorway)

WHO was killed / injured (pedestrian, cyclist, driver, passenger, age groups)

WHAT were the apparent circumstances (speeding, turns at junctions, drunk driving, ...)

- To illustrate the above: Following an accident, in Irish media, it usually only says "cyclist was hit by truck on xy street" , while in other countries (e.g. Germany) the public would learn that "a cyclist was knocked down by a truck, when cyclist was travelling straight ahead in a cycle lane at green light on xy road, when the truck driver was turning into abc street (acc. to witnesses)." Some more substantial information would be useful and much appreciated. Otherwise public opinion cannot grow beyond a simple "oh how terrible...".



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The Stockholm Declaration

The RSA must work with all stakeholders towards the implementation of the UN's Stockholm Declaration as signed this year by the Irish Government. The Declaration commits the participants to the full implementation of the 2030 Agenda for Sustainable Development and to -

- contribute to reducing road deaths by at least 50% from 2020 to 2030,
- increase political commitment to address the burden of road traffic injury on children and young people by ensuring that the Global Strategy for Women's, Children's and Adolescents Health delivers necessary action on road safety,
- include road safety and a safe system approach as an integral element of land use, street design, transport system planning and governance, especially for vulnerable road users and in urban areas,
- establish regional, national and subnational strategies and action plans for road safety and contributions from different governmental agencies as well as multi-sectoral partnerships to deliver the scale of efforts required at regional, national and sub-national levels to achieve SDG targets, and that these strategies and efforts are transparent and public

In the new RSA strategy 2021-2030, all the above points should be reflected and included, be it through direct RSA activities or recommendations as a key stakeholder to feed into the relevant authorities' policies.

We look forward to the publication of the summary review of the consultation process as well as the review and report of the outgoing strategy and eventually the draft strategy paper. Please do not hesitate to contact us at any time to discuss our submission or for any other matter at tmfcork@gmail.com.

Kind regards

Stephan Koch

Transport and Mobility Forum – Chair

Note: *The comments within this submission are solely the view of the Transport and Mobility Forum (TMF) as a whole and not the opinion or view of any individual partner of the TMF.*

**) A full list of partners in the Transport and Mobility Forum can be found at*

<https://transportandmobilityforum.com/partners/>