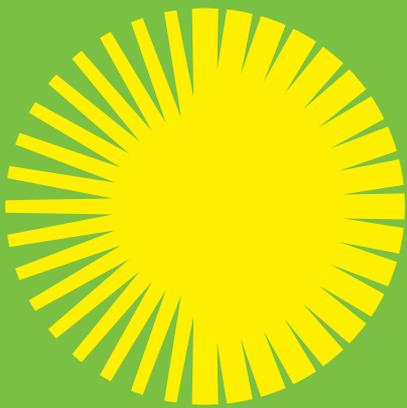


**31 January 2019**

**National Cycling Strategy**

**Alternattiva Demokratika**



# National Cycling Strategy and Action Plan for the Maltese Islands

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# Introduction

Alternattiva Demokratika – The Green Party(AD) is submitting this document in response to the consultation on the National Cycling Strategy and Action Plan for the Maltese Islands (referred to as CS in this document) published by Transport Malta in November 2018.

While acknowledging that a CS for Malta and Gozo is long overdue and while welcoming some of the initiatives presented within the published CS we would like to comment on some of the proposals as well as put forward recommendations for improving the strategy.

## **Safety first: Prioritise pedestrians and cyclists.**

It is important that a cycling strategy for Malta puts cyclists at its centre and takes into account the experience of cyclists in Malta while moving towards a modal-shift in transport use in Malta. A cycling strategy should also take into account benefits for pedestrians, and the safety of cyclists and pedestrians in Malta, who are currently vulnerable road users, should be of utmost priority. Infrastructure should reflect these values and be geared towards facilitating the movement of people, rather than the movement of cars.

# Comments

## **Cycling beyond health benefits: It is not just about leading an active lifestyle, but about feeling safe to commute.**

It is common knowledge that traffic congestion is a key concern of people in Malta, and it is therefore necessary to implement infrastructure and a strategy that promotes cycling as an alternative, comfortable, and convenient mode of transport – and not just as a health or sport activity. On paper it is quite clear that cycling is an ideal mode of transport, as it “uses less fuel, is healthy and does not cause any pollution” (CS pg. 5). Cyclists in Malta often also comment on the added benefits of not needing to find any parking, and being able to sift through traffic, thus saving overall time of a commute as compared to the same journey door-to-door by car.

However in Malta, the benefits of cycling are outweighed by the obstacles against it and it is therefore necessary that that strategy first acknowledges these obstacles and has specific aims and objectives to overcome them.

We believe that the strategy fails to address all the obstacles to cycling in Malta and Gozo. It is necessary for Transport Malta to not only see cycling as a “healthier mode of transport” (CS pg. 5) but as a mode of transport that is of equal importance to others, and for which investment in appropriate and safe infrastructure should be made. The CS states that “People make choices on how they want to travel based mostly on travel time and convenience.” In order to aim for a shift to multi-modal transport it would be necessary to not only raise awareness of the health benefits of cycling but to also ensure that it becomes “convenient”, comfortable and above-all, safe to cycle in Malta and Gozo.

## **Obstacles**

In the Bicycle Advocacy Group’s 2016 survey (CS pg. 35), the majority of respondents, 46.6%, identified road safety as the main deterrent for using the bicycle to commute. Other reasons were the steep hills, the weather, lack of fitness and cycling ability. While it is not possible to change the weather, the other obstacles mentioned can be mitigated, particularly road safety. Additionally, BAG note that 91% of respondents use evasive actions 2 to 4 times every hour spent cycling.

For instance the challenges faced by steep hills and lack of fitness are mitigated with the use of e-bikes, and lack of fitness and cycling ability can be improved with time. While experience and cycling ability might help one feel safe on the roads, the best way to improve road safety is to invest in more (where possible, segregated) cycle lanes, turn urban centres into car-free zones, and through road design which automatically slows down vehicles.

Cycling safety should not only be of concern during the Malta National Bicycle Ride “Cycling safety, features highly during this event; Cyclists are accompanied by TM electric vehicles and ambulance while TM enforcement officers and Police Officers flank the riders during the ride.” (CS pg 21) but always. One-off initiatives make for great marketing but in the long-term are an ineffective solution to promote cycling.

While the CS often refers to the added benefits of increased cycling, including improved air quality for all, it does not note that the very poor air quality on roads due to car emissions is yet another obstacle that keeps people from cycling as a mode of transport, i.e. commuting.

### **Strategic goals, targets and objectives**

The targets which are laid out in the strategy (CS pg. 53) say a lot without saying anything. While being based on the EU Commission 2011 White Paper: Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system, they are impossible to monitor and have not been tailored to fit the reality of Malta and Gozo.

For instance by saying that a target of the strategy is to “Double the number of people who choose cycling as a mode of transport for trips less than 5KM by 2050 as compared to 2010” it is necessary to first have the data available with which to compare. While the second target “Reduce injuries involving cyclists by 50% by 2050” might be easier to track thanks to data from police reports, however data might be skewed if the potential increased cyclists on the road is not accounted for, and if no distinction in research is made between commuter, sports, and courier cyclists.

In order to measure whether the strategy effectively reaches these targets they need to be adapted and research needs to be carried out in 2019 to set a baseline from which targets will improve. It is also important that the TM ensures that if such research is done, migrant and refugee communities in Malta are included in the research. As the accessibility of cycling in Malta should be available to all groups.

The five strategic goals of the strategy (CS pg. 53) are broad and achievable, however the objectives which are extrapolated from them could be more specific and measurable, indeed to (as above with the targets) be able to correctly measure the effectiveness and impact of the CS in the long-term.

### **Best practices**

It is overall disappointing that rather than look towards the policies and cycling strategies in cities/countries in which the percentage of trips conducted through cycling is highest, the CS has referred to the cycling policies of Manchester. We should be looking at best practices and not mediocre practices; Netherlands, Denmark are highest scorers on the ECF2015 cycling barometer.

# Recommendations

## Infrastructure

More bike racks (U bar type) as well as e-charging bike racks. Install air-pumps in city centres.

Bicycle racks should be installed with accessibility in mind. They should not restrict access for wheelchair users or prams. Bicycle racks should improve accessibility as otherwise bikes are tied to poles which can block paths.

Add water fountains in town centres, this can also help to alleviate plastic pollution while being convenient for everyone.

Replacing parking spaces with bike lanes in urban centres and/or allowing contra-flow of traffic, closing some so-called alternative routes to vehicular traffic, – trial in some localities. (reduces congestion etc.)

Traffic calming, i.e. make it more uncomfortable (for cars) to drive (while giving priority to public transport): Adding bollards, cobble stones for cars but not for bike lanes etc. Clear signage for cycling that indicates length of route by bike etc.

Proper width of cycling lanes, i.e. wider the faster the car speed limit on a road. And if possible separated or elevated from traffic.

Bike lifts, bridges, short tunnels to counter obstacles of steep hills.

Have a tax reduction scheme for people who commute to work with a bike.

Establish regional cycling lane networks, cycle lanes that make sense. For instance connecting Gozo ferry to Rabat and other cities in Gozo with e-bike schemes.

Connecting Hamrun, Marsa, Pieta, Ta'Xbiex, Msida to each other and to Valletta.  
 Connecting B'kara, Attard, Balzan, to each other and to University and Junior College.  
 Connection San Gwann, St Julians, Pembroke, Swieqi, Sliema, to each other and University and Junior College. Safe connections to MCAST in Paola. Connecting Zabbar, Marsascala, Marsaxlokk. Connecting Siggiewi, Zebbug, H'Attard, and Qormi to airport and each other. Bike schemes in these areas to reflect this.

## Cycling Malta

Cycling Malta should include advocates from BAG, sports cyclists, courier cyclists, migrants, young people (KNZ, KSU), older people, and have a broad regional representation (Gozo, Northern Harbour, Southern Harbour etc.). Remit should not only include promoting cycling and implementation of CS but to also ensure that those measures which are long-term and work in progress are truly ambitious and fine-tuned to achieve the goal of having a cycling nation.

**(E-)Bike grants**

We acknowledge that pedelecs are ideal for Malta and Gozo not only for those who find cycling too physically tasking but because they could replace the personal car – by allowing people to comfortably commute by bike without fear of sweating etc.

We recommend that the grant be increased to also cover the costs of pedelec cargo bikes which are much more expensive than a standard pedelec bike. There should also be increased grant on bicycle purchase for students, young people, and people who are retired. While the scrappage scheme that allows people to have more money to put towards a newer cleaner car should also apply to those people who scrap a car and buy a bicycle.

**Cycling Corridors**

The cycling corridors proposed in the annex involve unnecessary hill climbs and too many junctions (stops and starts), which should be avoided if people are to be truly encourage to start cycling as they make the routes inconvenient and uncomfortable.

# Conclusion

## People before cars, a clear long-term vision is needed

Furthermore it is necessary that the strategy takes in a holistic approach. It is difficult to look at this strategy in a vacuum, full well knowing that recent major roadworks in Malta have effectively made cycling more dangerous, by reducing cycle lanes in most cases or implementing cycling lanes with poor infrastructure in others (e.g. Vjal ix-Xarolla). The continued accommodations made for cars, only encourage increased use of personal vehicles and does little to encourage a change in people's habits and behaviour towards using cycling as a mode of commuting.

It is clear that road-design in Malta is currently based around making vehicle thoroughfare possible, rather than prioritising the transport and access to mobility of every single individual. Unfortunately this Cycling Strategy and Action Plan do little to make us trust that this will change anytime in the future and unless the above shortcomings are addressed it is clear that the CS will fail to achieve "Government's ambition being: a walking and cycling nation by 2025." (CS pg. 8)

Finally, we take this opportunity to welcome the somewhat facilitated access to cycling thanks to the continuation of the e-bike (pedelec) grant scheme in 2019. We also welcome the increase in investment in the past years put towards pilot projects, like the tallinja bike scheme, and promotion events, like European Mobility Week. Now is the time to make the leap from pilot projects and one-off events to serious investment in cycling as a safe commuting option.



