



Love 30 Campaign

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Galway City Council Special Speed Limit Bye-Laws No. 1, 2020

Submission by
Love 30 Campaign for Lower Speed Limits
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1 Summary

The Love 30 Campaign wholeheartedly welcomes the proposals by Galway City Council to reduce speed limits in the city centre and the suggestion that there will be further 30 km/h speed limits.

However, we are disappointed that the 30 km/h speed limit area in the city centre is modest in size and that no proposals were brought forward to introduce 30 km/h speed limits in neighbourhood centres, non-estate residential roads, or outside schools.

Further, we are concerned that the proposals retain or implement new 60, 80 and 100 km/h speed limits on roads with houses, schools, businesses and on roads with known safety issues. Almost all of the roads proposed to have higher speed limits are in Safety Camera (GoSafe) Zones. Exacerbating circumstances include lack of continuous footways and footways with low level of service, lack of cycleways / cyclepaths, lack of safe crossing points and haphazard footways that are overgrown, poorly surfaced and / or covered in road debris. While direct, many of the roads are not straight.



Image 1: Map of Safety Camera (GoSafe) Zones in the vicinity of Galway City from <https://www.garda.ie/gosafe.html>

Love 30 recommends that the draft bye-laws be amended as follows:

1. Ultimately, 30 km/h should be the default urban speed limit in all areas throughout Galway City, with exceptions for specific roads.
2. 30 km/h speed limits should be introduced in all residential estates, other residential roads and in neighbourhood centres.
3. Periodic 30 km/h zones should be implemented around all schools and other places of assembly (cinemas, theatres, community centres, religious buildings, etc.), that have large numbers of people arriving and / or departing at the same time.
4. These 30 km/h speed limit changes should also apply to roads in new housing estates that have not yet been taken in charge and to future housing estates. This can be achieved by setting 30 km/h as the default speed limit across the city, with exceptions for specific roads.
5. In semi-rural and rural areas, roads with ribbon housing should not have speed limits exceeding 50-60 km/h. In some of these cases, the speed limit should be substantially lower.

We ask you to provide a response on each of the points above, on whether they will be included in the bye-laws, and if not, to give a reason.

Suitable engineering measures should be taken to make these speed limits self-enforcing.

We urge the Council to do its utmost to continue the process of lowering speed limits in the City with the least possible delay.

Section 2 below gives more details of our review of the proposed bye-laws. Section 3 gives background on the benefits of lower speed limits.

Who We Are

The Love 30 Campaign is a national alliance of individuals and organisations who support lower speed limits in urban areas. We are campaigning for the introduction of more 30 km/h zones in urban areas, but particularly in town centres, residential areas, and near schools and other places of public assembly. The Campaign consists of walking groups, cycling campaigners, supporters of children's right to walk & play, and others who recognise the benefits of lower speed limits.

Our supporters include:

- A Playful City Dublin
- 20's Plenty for Us
- Cyclist.ie
- Galway Cycling Campaign
- Sligo Cycling Campaign
- Dublin Cycling Campaign
- European Network for 30 km/h
- Jake's Legacy
- JustWalkNow
- Phizzfest
- Playtime
- Cork Cycling Campaign
- Limerick Cycling Campaign
- An Taisce
- An Taisce Green Schools
- Irish Pedestrian Network
- WexBUG
- Politicians from across the political spectrum support the campaign

Image 2: All ages should be able to safely cycle in company and the 8-80 age cohort should be able to safely cycle independently.





Image 3: Children should be able to walk to and from school, play in their neighbourhood, visit grandparents, and go to the local shop.

2 Detailed Review of Proposed Bye-laws 30 km/h Speed Limits on Residential Roads

The Love 30 Campaign supports the proposals by Galway City Council to introduce 30 km/h speed limits in the city centre but is disappointed that many more residential roads in the City will retain higher speed limits. A residential road should not and does not have to be in an estate to have a 30 km/h or other low speed limit.

We urge Galway City Council to amend the proposals and / or follow the current phase of speed limit changes with further phases which will introduce 30 km/h speed limits at all schools and in all residential areas and neighbourhood centres as early as possible.

Potential for Additional 30 km/h Speed Limits

We recommend the introduction of 30 km/h as the default urban speed limit throughout Galway City. Exceptions can be made for specific roads.

We recommend that 30 km/h speed limits be introduced in all residential estates, other residential roads and neighbourhood centres and that periodic 30 km/h zones be implemented around all schools and other places of assembly (cinemas, theatres, community centres, religious buildings, etc.), that have large numbers of people arriving and / or departing at the same time.

We note that Dublin City will shortly have 30 km/h speed limits on all residential roads and that County Offaly and South Dublin County has 30 km/h speed limits on approximately 95% of its residential roads. We urge Galway City Council to follow this lead and to extend the 30 km/h or other low speed limits to all residential roads and neighbourhood centres.

Potential for 30 km/h Periodic Speed Limits

There are approximately 47 primary and secondary school sites in Galway City. This does not include the many preschools / playschools / childcare facilities nor the post-secondary colleges in the City. While some schools are surrounded by roads that have 30 km/h speed limits, the majority of schools are on, or immediately adjacent to, roads proposed to have higher speed limits. This is unacceptable.

Presentation to the Council Meeting 20th July 2020

The document "Presentation to the Council Meeting 20th July 2020 - Fran McEvoy (Senior Executive Engineer - Transportation)" contains the following text:

Extension of areas with 50 km/hr

Urban Areas have extended beyond existing 50 km/hr zones on some roads.

Extension of the 50km/hr speed limit is proposed for:

- ▶ Letteragh Road
- ▶ Rahoon Road
- ▶ Clybaun Road
- ▶ Ballymoneen Road
- ▶ Ballagh Road



Image 4: Extract from Presentation to the council.

However, this seems to be based on a misunderstanding of the existing speed limits.

- Letteragh Road - the entire road already has a 50 km/h speed limit, the proposal is for an 80 km/h speed limit.
- Rahoon Road - the entire road already has a 50 km/h speed limit, the proposal is for an 80 km/h speed limit,
- Clybaun Road - the entire road already has a 50 km/h speed limit, the proposal is for an 80 km/h speed limit.
- Ballymoneen Road - the entire road already has a 50 km/h speed limit.
- Ballagh Road - unable to definitively identify this road, already has a 50 km/h speed limit.

Please refer to Appendix C for a detailed analysis.

We are also concerned that the document "National Speed Limit Review 2015-2017 - Galway City Council" (Tobin Consulting Engineers for Transport Infrastructure Ireland) contains similar issues. Please refer to Appendix B for a detailed analysis.

Bye-law Text and Maps

The proposals can be split into three groups :

1. The 30 km/h speed limit zone in the city centre - we support this proposal and suggest that it be expanded to cover nearby residential roads.
2. 60, 80 and 100 km/h on main roads around the periphery of the city - we have concerns about these, as detailed in Appendix A. These concerns are primarily related to safety and modal share, but we also have noise and pollution concerns.

3. 80 km/h on minor rural roads - this is generally unacceptable and speed limits not exceeding 50-60 km/h should be put in place.

Having analysed the bye-laws, detailed comments have been included in Appendix A. There are some issues that appear repeatedly throughout the maps and additionally some important principals that we wish to raise. For convenience, the summary list from Appendix A is repeated here.

Table 1: Summary of Principles and Repeat Issues (from Appendix A).

| Topic | Comments |
|-----------------------------------|--|
| Previous Bye-laws and Regulations | There appears to be a fundamental misunderstanding in the proposed bye-laws. Regulation 2 of the First Schedule of the Road Traffic (Speed Limits) (County Borough of Galway and County of Galway) Regulations, 1987 (S.I. No. 273/1987) was rescinded by the 2009 bye-laws. It appears that some of the signage under the 1987 regulations has not been changed. This misunderstanding creates the impression that roads are maintaining their 80 km/h speed limit, when in fact they are changing from 50 km/h to 80 km/h. |
| Urban Roads | There is scope for 30 km/h in many neighbourhood centres and on non-estate residential roads. |
| Schools | Appropriate routes to school should be put in place, with low periodic speed limits if necessary, at every school or similar establishment. While some schools are surrounded by roads proposed to have 30 km/h speed limits, the majority of schools are on, or immediately adjacent to, roads proposed to have higher speed limits. |
| GoSafe Zones | There are a large number of Safety Camera (GoSafe) Zones in the city. These should be analysed in conjunction with the proposed speed limits. Many Safety Camera Zones will merit safety audits. While the level of collisions might be explained by the level of traffic, that is also a justification to act. |
| Legacy Rural Roads | There are many instances of legacy rural roads proposed to have 80 km/h speed limits, even when there are exacerbating circumstances, such as ribbon housing, junctions for housing estates, lack of footways and lighting, poor horizontal and vertical alignments, erratic carriageway widths, unprotected streams / ditches, limited lines of sight, limited space for safe passing and /or gravel surfaces / gravel on surfaces. It would be inappropriate that these roads have 80 km/h speed limits. |
| New Roads | What of recently built and future roads? It is not acceptable to be perpetually playing catch-up as new estates and roads are built or taken in charge, all the time with those roads having no enforceable speed limit. The ideal solution would be to have a citywide 30 km/h speed limit, except for specified roads. |
| Junctions | At junctions, and particularly multi-arm junctions, the speed limit through the junction should normally be the speed limit on the road with the lowest speed limit. |
| Junctions / Bends | There are some instances of an increase in speed limit just before a junction / bend. This is inappropriate and should be corrected. |
| Increases in Speed Limits | It might be tolerable to marginally increase speed limits on a small number of roads. Note that it is permissible to have different speed limits on different carriageways and lanes, e.g. bus lanes could have a lower speed limit to reduce the speed at which buses pass cyclists. Dun Laoghaire-Rathdown County Council have implemented this on the N11. |
| Town Planning | In quite a few locations across the city, it is unfortunate and unacceptable that community facilities (shops, schools, sports grounds) are on the far side of main roads to the majority of housing. |
| Traffic Calming | Traffic calming is needed in many locations. While a reduction in speed limit may encourage many road users to reduce their speed, traffic calming will be needed to ensure that others comply. |
| Maps - Precedence | Which takes precedence when there are conflicts between the maps and the text? |

We note that there are a number of issues in the draft bye-laws text that could benefit from review, especially from a legal point of view. Detailed analysis of the bye-law text is included in Appendix A.

Exempted Drivers

The draft bye-law which provides for exemptions for emergency vehicle drivers, is unnecessary as the matter is dealt with by Section 87 of the Road Traffic Act 2010 (as amended by section 23 of the Road Traffic Act 2014 - see below). Moreover, the bye-law as drafted could be open to abuse and we recommend that it should be omitted, so that loopholes can be prevented.

<http://www.irishstatutebook.ie/eli/2014/act/3/section/23/enacted/en/html>

“(1) Requirements under the Road Traffic Acts 1961 to 2010 relating to vehicles and requirements, restrictions and prohibitions relating to the driving and use of vehicles, other than those provided under sections 49, 50, 51A, 52 and 53 of the Principal Act, sections 12, 13 and 15 of the Act of 1994 and sections 4, 5, 11, 12 and 14 of this Act, do not apply to—

- (a) the driving or use by a member of the Garda Síochána, an ambulance service (provided by a pre-hospital emergency care service provider recognised by the Pre-Hospital Emergency Care Council established by the Pre-Hospital Emergency Care Council (Establishment) Order 2000 (S.I. No. 109 of 2000)) or a fire brigade of a fire authority (within the meaning of the Fire Services Act 1981) of a vehicle in the performance of the duties of that member, or*
- (b) a person driving or using a vehicle under the direction of a member of the Garda Síochána,*

where such use does not endanger the safety of road users.”

Public Consultation

It is good to see that the bye-law public consultation was included on both the council’s website and www.speedlimits.ie

It is disappointing that there is no coherent public map of existing speed limits.

Other Issues

We recognise that a speed limit reduction will not be successful in reducing speed and improving safety unless improved enforcement and appropriate road design accompany it. We support the recommendation in the Design Manual for Urban Streets (Department of Transport, Tourism and Sport, together with the Department of the Environment, Community and Local Government, 2013), the official guidance policy for local authorities in relation to street design, that as far as possible lower speed limits should be accompanied by psychological and physical measures to encourage observance. We are conscious that such measures will frequently be necessary to secure compliance with the provisions in the Guidelines for Setting and Managing Speed Limits in Ireland (Department of Transport, Tourism and Sport, 2015).

3 Background

The Case for 30 km/h Speed Limits

The Love 30 Campaign favours a default speed limit of 30 km/h in urban areas, residential estates, and all areas of high pedestrian and cycle use. Lower speeds reduce the potential for collisions and, importantly, reduce the severity of injury when collisions occur. Reducing vehicle speeds to 30 km/h makes roads safer for everyone - children and adults (including older people and those with frailties or disabilities), pedestrians, cyclists, and motorists. The disadvantages of lower speeds are modest and are greatly surpassed by the benefits.

There is a need for a fundamental shift in how we manage traffic to:

- Enable pedestrians to use our roads and streets safely;
- Allow children to play outdoors;
- To cater for the safety of all ages while cycling in company and the 8-80 age cohort while cycling independently;
- Allow people of all ages to walk to study or work, shops, and other amenities, and to visit friends and family.

The threat of traffic particularly affects children. It inhibits their access to the outdoors and their independent mobility. Understandably anxious, parents prefer to drive their children places in areas where speed limits are higher. There is solid evidence of a loss of independence and freedom to play outdoors for primary school children. Fewer children in this age group are walking to and from school, playing out in their local neighbourhoods, roaming and exploring, meeting up with friends, visiting grandparents or simply going to the local shop.

Research shows that lower speed limits could reverse this and the attendant problems such as a rise in obesity, limited outdoor play opportunities and learning navigation skills.

In addition to improving safety, lower speed limits would help parents feel more confident about allowing their children the freedom to walk and cycle. This would have consequential benefits for their fitness and general health, would contribute to combating the rising levels of obesity in our society, and encourage greater social interaction.

Older people and those with disabilities can be intimidated by fast-moving traffic and are more comfortable moving about in areas with lower speeds. The improved safety, and perception of safety, provided by lower speed limits can transform urban streets and residential estates into more vibrant living spaces, providing a better living environment.

It is well recognised that community health and the well-being of individuals is promoted by the local environment being 'liveable' in nature. Motor traffic dominance of our villages, towns and cities is not conducive to the 'liveability' concept. Lower speed limits help greatly to make a community more liveable again. Children have a human right not to grow up in an obesogenic environment brought about by the failure a road authority to set lower speed limits to encourage walking and cycling to schools in the locality.

In Ireland, we have a high prevalence of childhood overweight and obesity with approximately 26% of nine-year-old children already overweight / obese [ESRI 'Growing Up in Ireland', 2011: <http://www.esri.ie/pubs/BKMNEXT211.pdf>] The latent morbidity-costs for the health service are enormous if we do not take steps to address this serious health issue as it brings cardiovascular, diabetes, premature joint wear-and-tear diseases in its train.

The key issue for a road authority is parental reluctance to permit their children to walk or cycle to a local school due to fears about the safety of their child in traffic. Census 2016 data shows that at primary school level the total walking or cycling to school was a mere 135,544. The car continues to be the dominant means of transport for this group with 327,039 children (60%) being driven to school in 2016. This is one of the reasons why we have obese and overweight children.

Marino in Dublin is a neighbourhood that has had 30 km/h speed limits since 2005. Since implementation, serious and fatal collisions in the neighbourhood dropped from 17 (1997-2004) to 4 (2006-2013) - a drop of 76%. Dublin City Council commissioned a professional survey of residents. In response to an interview about their attitudes toward the existing 30 km/h speed limit in their residential area:

- 87% of Marino respondents are satisfied with the 30 km/h speed limit;
- 91% report being fully in favour of the 30 km/h speed limit from the start;
- 96% would oppose reverting to a higher speed limit;
- 58% feel that it's safer for children to play outside because of the lower limit;
- 55% feel that people are more likely to walk or cycle in the area because of the lower limit;
- 41% feel that Dublin City Council is doing enough to control traffic speeds;
- 82% would support the introduction of a 30 km/h speed limit in other residential areas.

Benefits of Lower Speed Limits

Regarding personal safety, 30 km/h is fundamentally safer than 50 km/h for pedestrians, cyclists, and other vulnerable road users. It is well established that lower impact speeds result in fewer and less severe injuries. The images below demonstrate this.

HARD AND FAST FACTS

Pedestrians hit by a car...

at 30 km/h – 1 in 10 will die



at 50 km/h – 5 in 10 will die

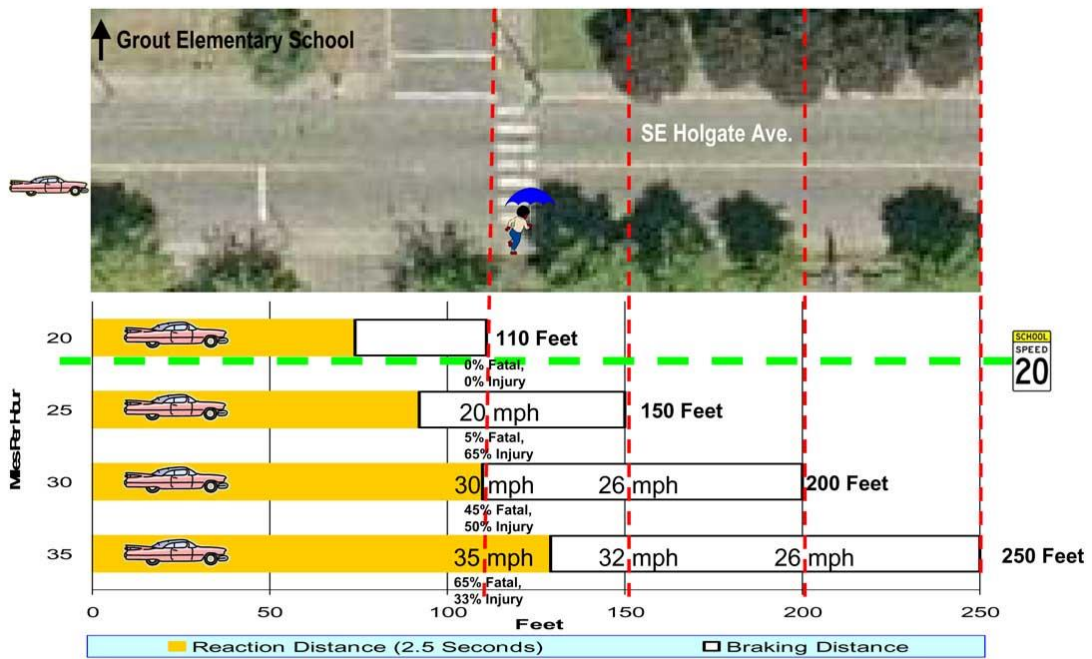


at 60 km/h – 9 in 10 will die



Image 4: Illustration from the Road Safety Authority showing the impact of vehicle speeds on pedestrian fatalities.

EFFECTS OF SPEED ON STOPPING DISTANCE



District Coalition - Southeast Uplift Neighborhood Association



Image 5: Image demonstrates how lower speeds can minimise stopping distances for cars, thereby preventing collisions.

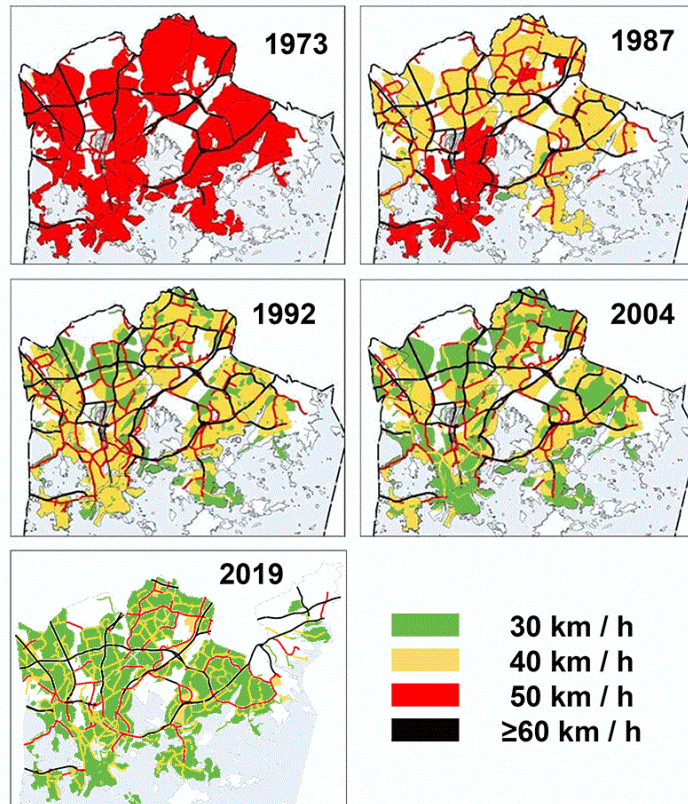


Image 6: Evolution of 30 km/h speed limits in Helsinki, Finland. Speed management in Helsinki, Dr Eero Pasenen, Aalborg University, 2004 and Helsinki City Council 2019.

Wherever 30 km/h speed limits have been introduced as the default speed limit, safety has improved, and there are fewer collisions and injuries. Throughout Europe, 30 km/h is fast becoming the default urban speed limit for cities, towns, and villages. In some cities, speed limits as low as 10 km/h are in place in ‘home zones’.



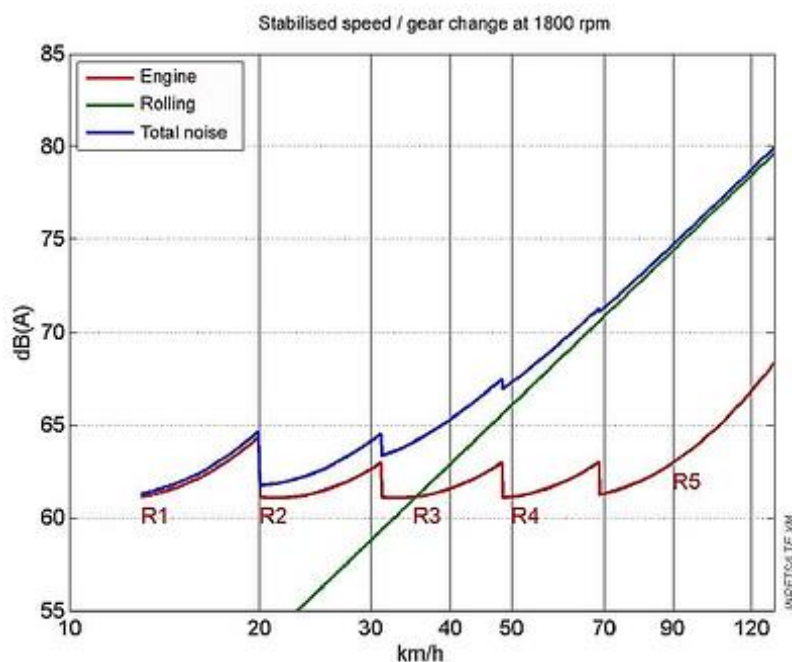
Image 7: Village scene with older people, wheelchair and pram users, pedestrians, dog walker, shoppers, cyclists, and motorists. All will benefit from the safety and environmental benefits.

In the UK, where 20 mph is the equivalent of our 30 km/h, the “20’s Plenty for Us” Campaign (www.20splenty.org) has been actively campaigning for reduced speed limits in urban locations. There are now over 20 million people in the UK living in 20 mph (30 km/h) areas. This includes many large cities and boroughs of London. 20’s Plenty has many background research papers, showing the benefits of 20 mph areas at www.20splenty.org/briefings

However, speed reductions give, not only a safety dividend, but also a socio-economic dividend, which makes the urban space a nicer place to live. Lower speeds result in less noise & pollution and greater fuel efficiency (high fuel consumption is associated with stop-start traffic, not slow traffic). On residential roads and shopping streets, people simply do not want to be exposed to the noise, fumes, and dangers from higher speed traffic. Experience elsewhere has been that the introduction of 30 km/h urban speed limits leads to an increase in the number of people walking and cycling, and thus to healthier lives.

While 50 km/h isn’t particularly noisy or polluting, the acceleration from stop to 50 km/h is much noisier and more polluting than the acceleration from stop to 30 km/h. Air pollution currently kills more than 1,000 per year in Ireland, primarily through asthma, cancers and other pulmonary illnesses. Reduced acceleration also means improved fuel economy and lower vehicle maintenance costs.

Figure 2.8. Engine noise and rolling noise as a function of speed



Source: INRETS.

Image 8: Engine noise and rolling noise as a function of speed.

The reduced fuel consumption from lower speed limits can also help to contribute to the reduction in emissions that is required to help us meet transport greenhouse gas emission targets.

The Department of Transport Tourism & Sport's Design Manual for Urban Roads and Streets (DMURS) recommends that where cyclists and pedestrians are present in large numbers lower speed limits should be applied. It also recommends lower speed limits where vehicle movement priorities are low, such as on local streets.

Higher speeds can discourage pedestrians and cyclists and encourage the use of larger and heavier cars. This has wider implications for society in impairing social interaction on the street (causing isolation), effects on the balance of trade (from the import of vehicles and fuels), health issues from lack of exercise and exposure to pollution, and lack of passive supervision, allowing crime to go undetected. The objective of any safety measures should be more than to reduce the number of casualties, but also to empower vulnerable road users, especially children, older people and those with frailties or disabilities, so that they can be an active part of and avail of all of the facilities in their community and not be intimidated by traffic.