



Galway City Community Network
Lionra Pobail Chathair Na Gaillimhe

Galway City Community Network CLG

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Galway City Community Network, The Public Participation Network in Galway City

Galway City Council Road Traffic (Special Speed Limits) Bye-Laws No. 1 – 2020

GCCN Submission

September 2020

Preface

Established in 2014, **Galway City Community Network (GCCN)** is the Public Participation Network in Galway City. It represents groups and organisations in the community, voluntary and environmental sectors in Galway City. The twin objectives that GCCN pursues are to:

- Advance the values of sustainability, equality, culture, community, empowerment and inclusivity and embed these in the policies, programmes and practice of local government, state organisations, national government and civil society.
- Develop and implement progressive models of and approaches to representation, participation and engagement for civil society in informing and shaping policy development and implementation.

Context

GCCN welcomes the opportunity to make this submission on the proposed Galway City Council Road Traffic (Special Speed Limits) Bye-Laws No. 1–2020, made after consulting with GCCN members and on the basis of a workshop with members of the appropriate GCCN linkage group.

GCCN Policy and Positions

In developing this submission, GCCN has drawn on its Policies and Positions document, the relevant sections of which stated:

- GCCN policy on transport is based on a Hierarchy of Road Users in the following order:
 1. pedestrians and people with disabilities
 2. Cyclists
 3. Public transport and
 4. Private motor transport.
- GCCN endorses the European Charter of Pedestrian Rights and the Road Danger Reduction Charter.
- GCCN notes that documents such as the National Cycle Policy Framework, the Design Manual for Urban Roads and Streets and the NTA Permeability Best Practice Guide seek to address inappropriate and unsuitable roads management and town planning practices. The network endorses the overall approach advocated in these documents.
- Speed limits of 30km/h or lower are the default option for all non-arterial roads in the city.
- Roundabouts be replaced with signalised crossings and in the short term raised table zebra crossings be established on all entries and exits recognising that the challenges and risks that current roundabout designs impose on vulnerable users are a barrier to pedestrian and cyclist mobility.
- Safe travelling routes to amenities and recreational grounds are provided including for example, bike routes away from traffic, pedestrian crossings, traffic calming systems, lowering of speed limits and addressing 'rat-runs'.
- Safe areas are established in residential areas which; favour pedestrians and children's play areas over traffic, have speed limits of walking speed and separate roads with access for bicycles, buses and pedestrians from those open to motor vehicles.

- Existing bóithríns and greenways in the city and its environs are protected and connected where possible and further routes developed with the twin aims of promoting ecological corridors for wildlife and active travel routes for humans.

Submission

Observations

1. There is consensus amongst those that participated in the GCCN workshop that the consultation process for the Road Traffic (Special Speed Limits) Bye-Laws No. 1 – 2020 is poor in the extreme. Specifically:
 - a. The consultation process was undertaken primarily in August, when it is universally agreed that this is not an appropriate time of the year for a public consultation.
 - b. There were no special measures undertaken to consult with residents in the areas affected, as is the norm in other local authority areas.
 - c. The quality of the online map was unacceptable and well below the norm for this type of consultation
 - d. The online map is misleading, particularly when it comes to identifying the inner-city 30KM zone – any initial glance would suggest that adjacent roads are included within the perimeter, yet this is not the case (see Appendix 1: Map Comparison of 30km/h zone)
 - e. There is a complete absence of clarity in relation to *proposed changes* to existing speed limits
 - f. There is no rationale provided for the zones that have been identified.
2. The draft bye-laws are written from the perspective of *leaving the city*, when it may be natural to increase speed, rather than from the perspective of someone *coming into the city*, when it would be more normal to focus on a reduction of speed. The viewpoint of residents on and adjacent to roads should be considered. The creation of safer and enhanced environmental local zones adjacent to residential zones is required for the benefit of Galway City residents.
3. The draft bye-laws give every appearance of favouring county-based car-commuters to the detriment of residents, cyclists, pedestrians, public transport users and recreational road users. The bye-laws do not align with policy based on a Hierarchy of Road Users outlined above.
4. One of the strategic aims of the Galway Transport Strategy is to provide resilience of operation of the road network such that ‘all travellers have a reliable (not necessarily fast) journey time’¹ when using the road and street network. This supports lower speed limits and safer local environments.
5. Roads and roadways are critically important for health and wellbeing. Never has this been more critical than in the current COVID-19 context. These draft bye-laws do nothing to promote and facilitate the use of roads and roadways by anyone other than motorists. There is no assessment of the social and health impacts, including noise and air pollution of setting

¹ Table 4.2, Galway City Council and Galway County Council (2016), Galway Transport Strategy.

speed limits at various levels. In urban areas with speeds of between 30 and 60 kph per hour, reducing speeds by 10 kph per hour would cut noise levels by up to 40%.²

6. There is a significant inconsistency and incompatibility in what the City Council have stated in their ambition to improve walking and cycling infrastructure and the speed limits that are suggested. These speed limits will pose a real danger to these road users. 23% of the population of Galway City travel on foot.³ This form of transport would be greatly supported by a lower speed environment and should lead to an increase in walking.
7. Signage and Enforcement – signage identifying the limit is critical to ensure that there is clarity to all road users, and enforcement is critical to send a clear message that the speed limits will be enforced.

First Schedule - 100km/h

GCCN contends that it is inappropriate to schedule the roads identified to be 100km/h roads for that high a limit for the following reasons:

- National Guidelines on Setting and Managing Speed Limits state that Dual Carriageways can be considered for an 80km/h speed limit if there is little or no direct access, junctions are very limited and are signal controlled and/or roundabouts and pedestrians/vulnerable users are segregated.⁴ This is not the case for the N6 and the guidelines recommend a limit of 50km/h.
- All the roads identified are used by cyclists and, to a lesser extent, pedestrians. A number have slip-roads and in almost all cases, there is no segregation for pedestrians and cyclists from motor traffic.
- This speed limit poses a real cause for concern for people with disabilities and other vulnerable road users, particularly in trying to cross the roads as this high a speed limit does not sufficiently promote the need for care, even at crossing junctions.
- While there may be plans for improving walking and cycling infrastructure in the city, speed limits need to be set for the current infrastructure not in advance of proposed Greenways and Greyways on these routes.
- The current proposal to reconfigure Martin roundabout into signalled junction would not be compatible with an increase of the speed limit to 100 km/h.
- The An Post Collection Centre on the Tuam Road is an amenity that is not accessible by public transport. As a result, this is a route that is used by pedestrians and cyclists and a speed limit of 100 km/h is not appropriate.

Recommendation

GCCN recommends that the speed limit for the roads included in this section be set at 60km/h aside from the N6 which is recommended to be set at 50km/h in line with national guidelines.

Second Schedule - 80km/h

GCCN contends that it is inappropriate to schedule the roads identified to be 80km/h for the following reasons:

- All of the roads in this schedule are used as an amenity by residents for both walking and cycling. These roads also link to various amenities including recreation, education and commerce. It is vital that residents can travel safely from residential areas to amenities. Active

² Mitchell, P. (2009), Speed and Road Traffic Noise: The role that lower speeds could play in cutting noise from traffic, UK Noise Association, accessible at: http://www.ukna.org.uk/uploads/4/1/4/5/41458009/speed_and_road_traffic_noise.pdf

³ Galway City Council and Galway County Council (2016), Galway Transport Strategy.

⁴ Department of Transport, Tourism and Sport (2015), Guidelines for Setting and Managing Speed Limits in Ireland Overall impact of 30kph zone increased greatly if connectivity is achieved to residential zones of city where residents can safely travel.

modes of transport are discouraged if speed limits increase. Segregated infrastructure for pedestrians and cyclists would be needed before an increase in speed limits could be considered in these areas.

- Many amenities in these areas are accessed by young people who would be travelling on foot or by bike. An increase in speed limits would prevent safe access for young people using active modes of transport.
- These roads also encompass residential areas and the default speed limit for residential areas is 50km/h. Some of these roads were rural areas in the past however now they are busy residential areas.
- Bóthar na dTreabh is a recreational zone with access points to Terryland Forest Park. An increase to 80km/h would have a detrimental impact on Terryland Forest Park, an important area of biodiversity and green space.
- The R338 Coast Road is a nature amenity area for residents and the wider community and is on the proposed Greenway Corridor. An increase of speed limit would have a detrimental impact on this area and discourage active modes of transport. The Motorway and N67 dual carriageway are the natural routes for longer distance motor vehicle journeys at greater speeds.
- The Galway Cycle Bus highlights the dangers children and young people face when they are using active modes of transport to travel to school. 80km/h is an inappropriate speed limit in areas where children and young people are travelling to school for example the proposed changes to the Upper Clybaun Road and Ragoon Road which would impact children travelling to Knocknacarra national school and Scoil Naomh Sheosaimh primary school in Boleybeg respectively. These changes would negatively impact the safety of children and parents and constrains their means of travel to school to car only, with well-established economic and health consequences.
- Motorised wheelchair users also use roads in these areas as footpaths are unsuitable and inaccessible. A speed limit of 80km/h would be detrimental to their safety.
- Many of the rural roads in this schedule have a consistent and concerning pattern of road traffic collisions, some of which have been serious or fatal. (See Appendix 2: Maps of Road Collisions in Galway City)

Recommendation

GCCN recommends that the speed limits are set for all these roads at 50km/h with the exception of (i) N6 at 60km/h as there is some segregation of pedestrians and cyclists.

Third Schedule - 60km/h

GCCN contends that it is inappropriate to schedule the roads identified to be 60km/h for the following reasons:

- All of the roads in this schedule are used as an amenity by residents for both walking and cycling.
- These roads also link to various amenities including schools like St. James School and also the proposed new site for The Bish (see previous section in relation to children and young peoples' safety in accessing schools). They also contain other amenities such as the river walk at Dangan which attracts walkers and cyclists from other areas. Safe access to these amenities needs to be prioritised over a minimal decrease in car journey times.
- With the current speed limit there are already safety concerns for pedestrians and cyclists due to a lack of segregation for example the lack of pedestrian crossings on the Moycullen Road

despite the number of estates in the area. An increase of the speed limit would increase safety concerns for these road users.

- These roads also encompass residential areas and the default speed limit for residential areas is 50km/h. They include new housing developments for example on Bóthar na Choiste.

Recommendation

GCCN recommends that the speed limit for the roads included in this section be set at 50km/h.

Fourth Schedule - 30km/h

GCCN welcomes the schedule of 30km/h for the identified roads which aligns with the GCCN's position of speed limits of 30km/h or lower are the default option for all non-arterial roads in the city. However, boundary roads have been excluded from this inner city zone.

Recommendations

In the interest of safety for all road users GCCN recommends that these boundary roads should be included. The overall impact of 30kph zone is increased greatly if connectivity is achieved to residential zones of city so residents can safely travel using active modes of transport.

GCCN also recommends the introduction of 30km/h limits outside and on the approach to all schools (see Appendix 3: Map of Educational Facilities), and where necessary, using variable speed designations as provided for in legislation and national guidelines for example if on an arterial route a road could be 50km/h outside of school hours.

GCCN recommends that the following boundary roads are included in the 30km/h zone; Newcastle Road Lwr, St. Mary's Road, The Crescent, Fr. Griffin Ave., Fr. Griffin Road, The Long Walk, Dock Road, Lough Atalia Road, Moneenageisha Road, Sean Mulvoy Road.

GCCN recommends that Salthill and link roads, Shantalla and the Claddagh should be included in the 30km/h zone. The full extent of the Dyke Road and link with Coolough Road to Kirwan should also be set at 30km/h due to the highly residential zone

All non-arterial roads in suburban areas that have a "link" or "local" function should be set at 30km/h, that is any road that is not a "N"-road or a "R"-road.

Conclusion

1. GCCN welcomes the 30km/h proposal but inclusion of boundary roads and other proposed areas including outside and on the approach to all schools would increase safety of more vulnerable road users.
2. All proposals should be equality proofed to ensure the safety of more at-risk road users including people with disabilities, older people and children and young people.
3. Proposals need to be designed considering hierarchy of road users (1. pedestrians and people with disabilities 2. cyclists 3. public transport and 4. private motor transport).
4. Consultation with residents in impacted areas is required.
5. Quality of Consultation needs to be improved.
6. All residential areas should be 50km/h by default (see Appendix 4: Map of Residential Areas).
7. Safe travelling routes to amenities and safe areas in residential areas must be prioritised.
8. Bye-laws should be voted on in sections by City Councillors rather than as a whole.

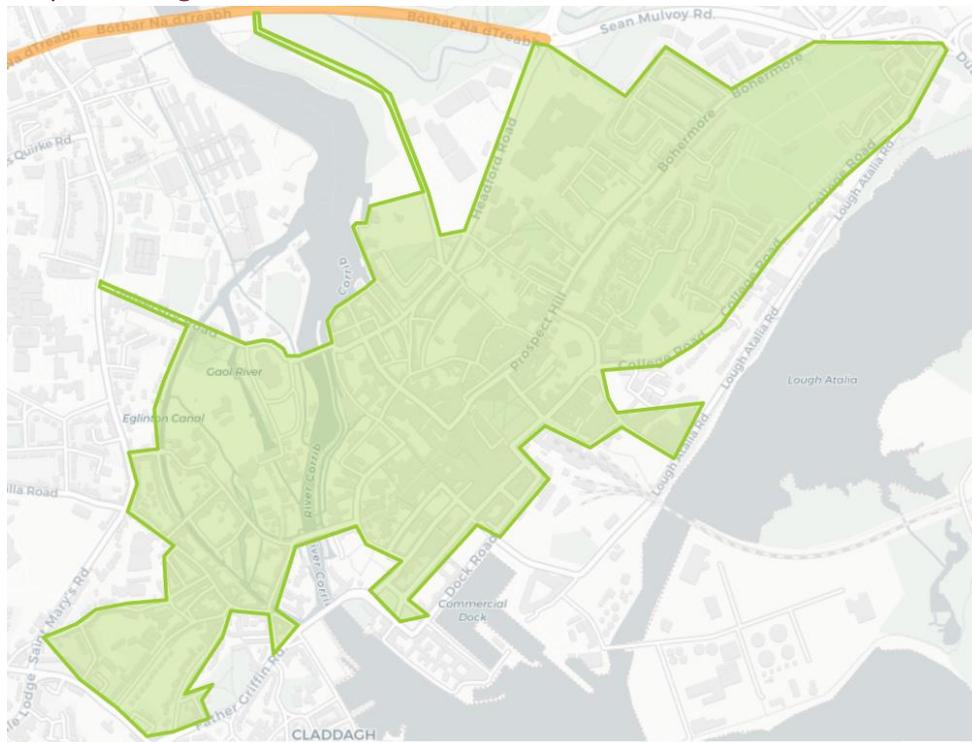
Appendices

Appendix 1: Map Comparison of 30km/h zone

Consultation Map

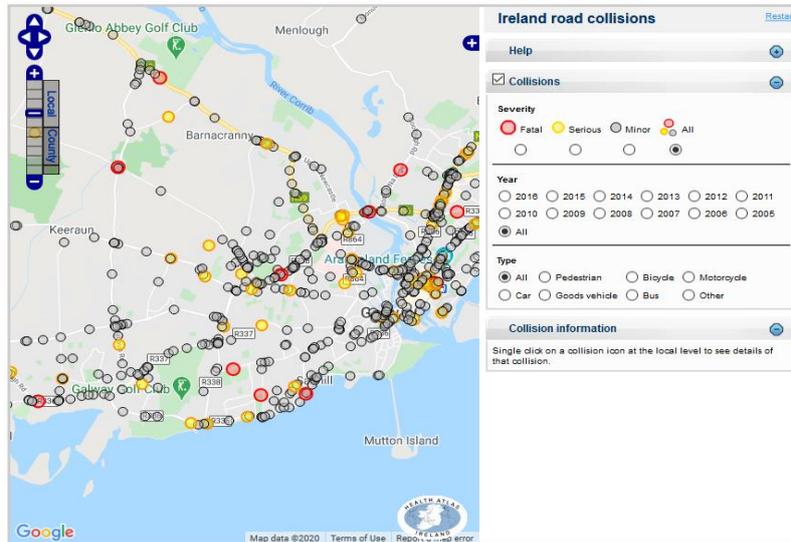


Map Outlining 30km/h Zone

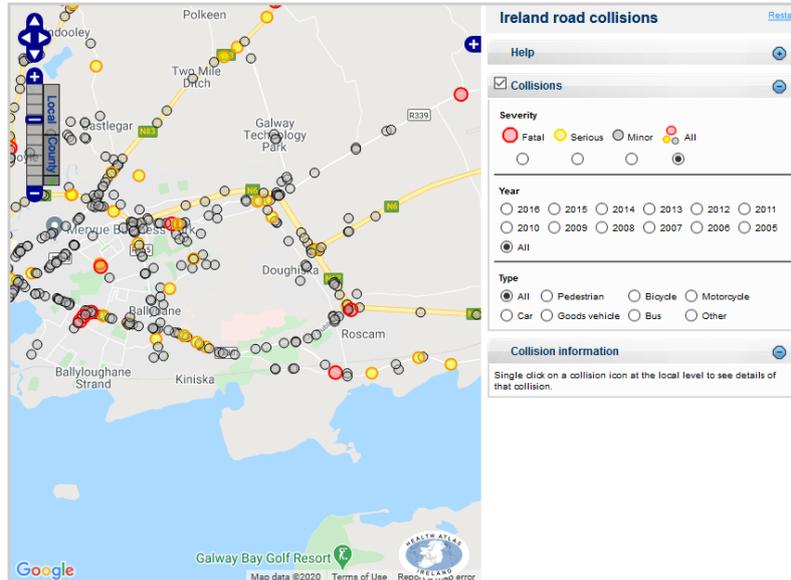


Appendix 2: Maps of Road Collisions Galway City⁵

Map of Road Collisions Galway West



Map of Road Collisions Galway East



⁵ Road Safety Authority, Ireland Road Collisions, <https://www.rsa.ie/en/RSA/Road-Safety/RSA-Statistics/Collision-Statistics/Ireland-Road-Collisions/>

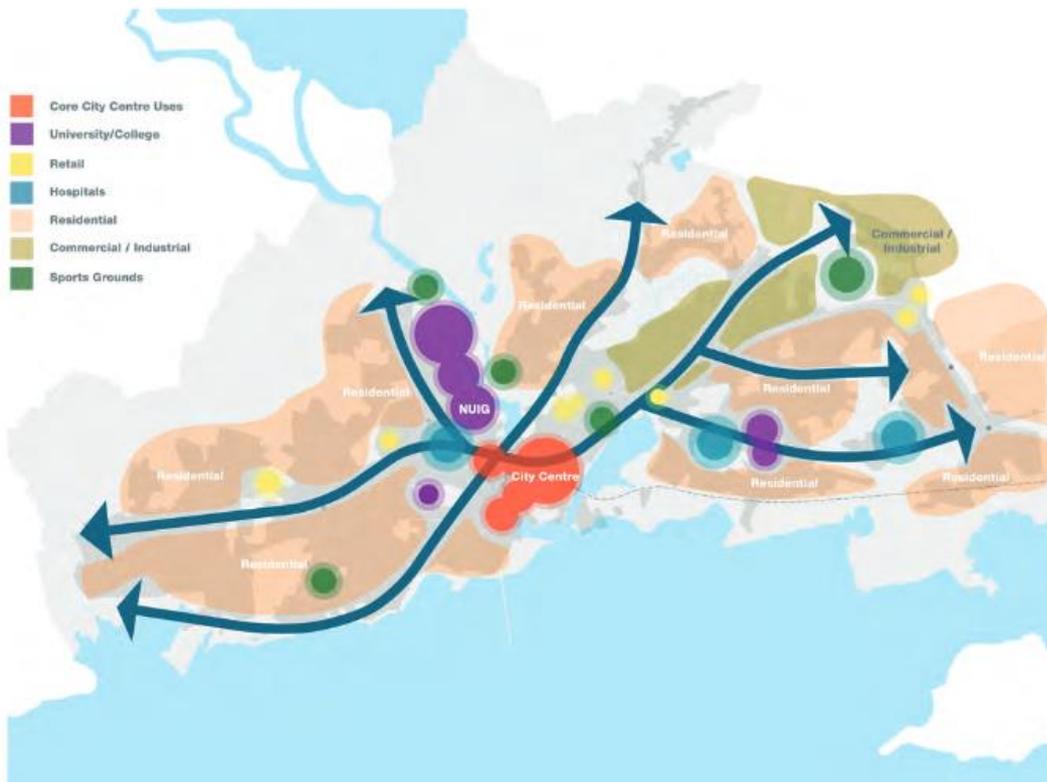
Appendix 3: Map of Educational Facilities⁶

Figure 8.1 Proposed Bus and Cycle Networks and locations of educational facilities



Appendix 4: Map of Residential Areas⁷

Figure 8.2 Land-Use Integration with proposed public transport routes



⁶ Figure 8.1, Galway City Council and Galway County Council (2016), Galway Transport Strategy.

⁷ Figure 8.2, Galway City Council and Galway County Council (2016), Galway Transport Strategy.