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Submission on

Road Traffic (Speed Limits) (County of Fingal) Draft Bye-Laws (No. 2) Local and Regional Roads 2013

1 November 2013

1.0 Dublin Cycling Campaign

The Dublin Cycling Campaign has been working since the early 1990s to encourage cycling and to represent the interests of everyday commuting cyclists. We want to make streets safer for cyclists and to increase public awareness of the benefits of cycling. We want to see a quantum increase in the use of the bike for commuting to study, work and for utility purposes, recognising that a 'critical mass' of cyclists in traffic leads inevitably to safer streets. Safer streets for cyclists are also safer streets for pedestrians.

Dublin Cycling Campaign is a member of Cyclist.ie www.cyclist.ie and the European Cyclists' Federation www.ecf.com

See www.dublincycling.ie for further information.

2.0 General

Dublin Cycling Campaign would like to support the expansion of the number of roads in Fingal with lower speed limits, as proposed in the revised bye-laws. In due course, it may be appropriate to raise the speed limit on a small number of other roads.

With these bye-laws, the number of residents of housing estates with 80km/h speed limits drops from about 40,000-50,000 to 5,000-15,000. Most of those roads are moving to 50km/h. However, there will still be some housing estates and a large number of country laneways with extensive ribbon development that will remain at 80km/h.

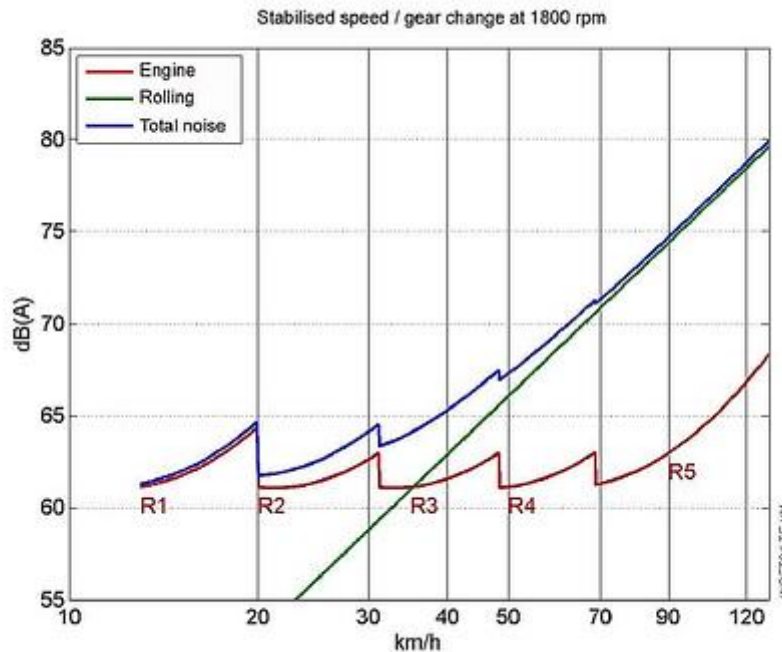
While this is substantial progress, we feel that there is much greater scope for lower speed limits throughout the county, even to make 30 km/h the default limit in pedestrian-rich areas (with exceptions being made for certain roads).

2.1 Benefits of Lower Speed Limits

Lower speeds result in less noise and 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 don't want to be exposed to the noise, fumes and dangers from higher speed traffic. While the drop from 80 km/h is both substantial and welcome, further progress is needed.

While 50km/h isn't particularly noisy / polluting in itself, the acceleration from stop to 50km/h is much more noisy / polluting than the acceleration from stop to 30km/h. Reduced acceleration also means improved fuel economy. It has been observed that in this country we have the habit of racing up to the next red traffic light and that needs to change.

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



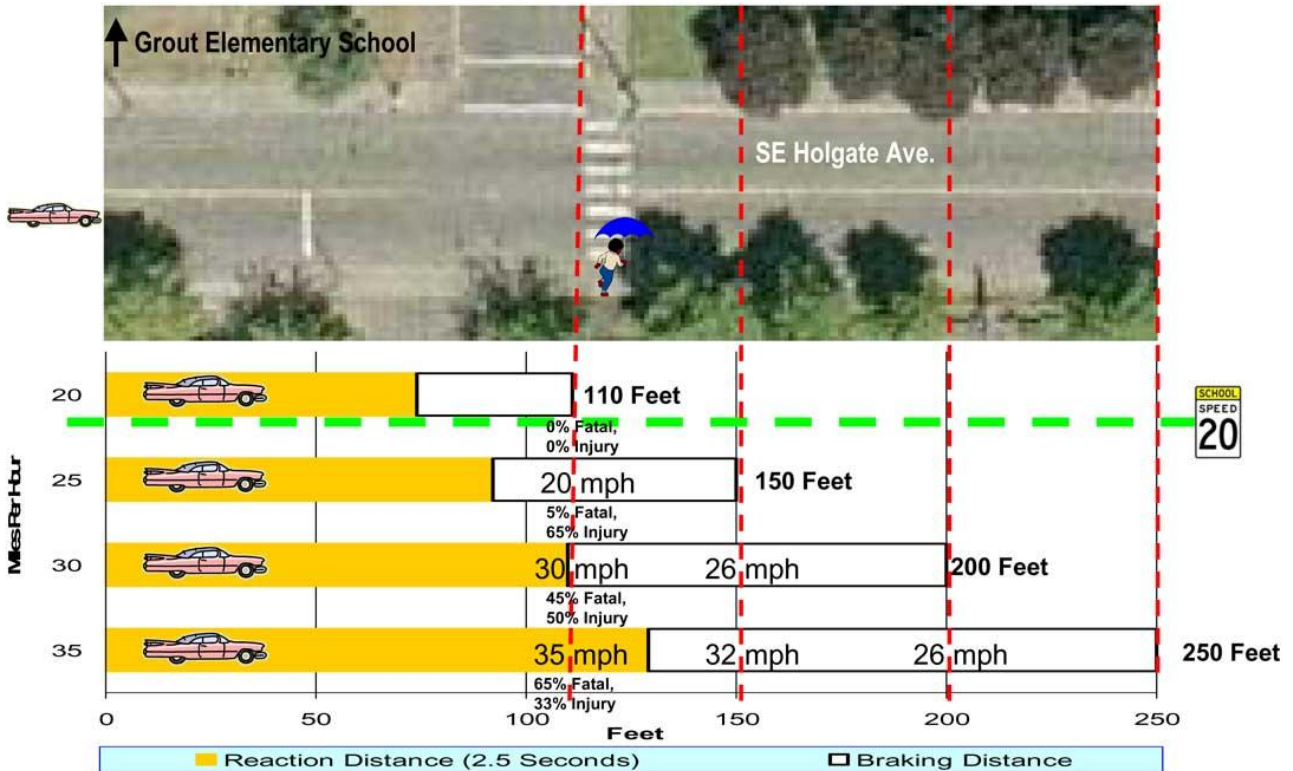
Source: INRETS.

Image 1: Engine noise and rolling noise as a function of speed.

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

Not only that, but higher speeds have the psychological impact of discouraging pedestrians & cyclists and encouraging 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 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 and older people, 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.

EFFECTS OF SPEED ON STOPPING DISTANCE



District Coalition - Southeast Uplift Neighborhood Association



Image 2: Image demonstrates how lower speeds can minimise casualties or avoid them altogether.

The general experience of the 30km/h limits in Dublin City (as part of a range of measures) that were implemented in 2005, expanded in 2010 and adjusted in 2011 have been overwhelmingly positive. Traffic fatalities have fallen from 53 in 1997 to 19 in 2005 to approximately 5 in 2011, while other casualties have also fallen, especially among pedestrians and motorcyclists. However, not only is there the safety and socio-economic dividend, but it makes the city centre a nicer place to be.

In contrast, the heavy flow of cars through many other retail and entertainment areas is a reason not to shop or dine there. For those who are shopping, everyone is a pedestrian at some point - people can't shop while still in their car and car use for convenience shopping inhibits more valuable comparison shopping, where car use is usually more justifiable.

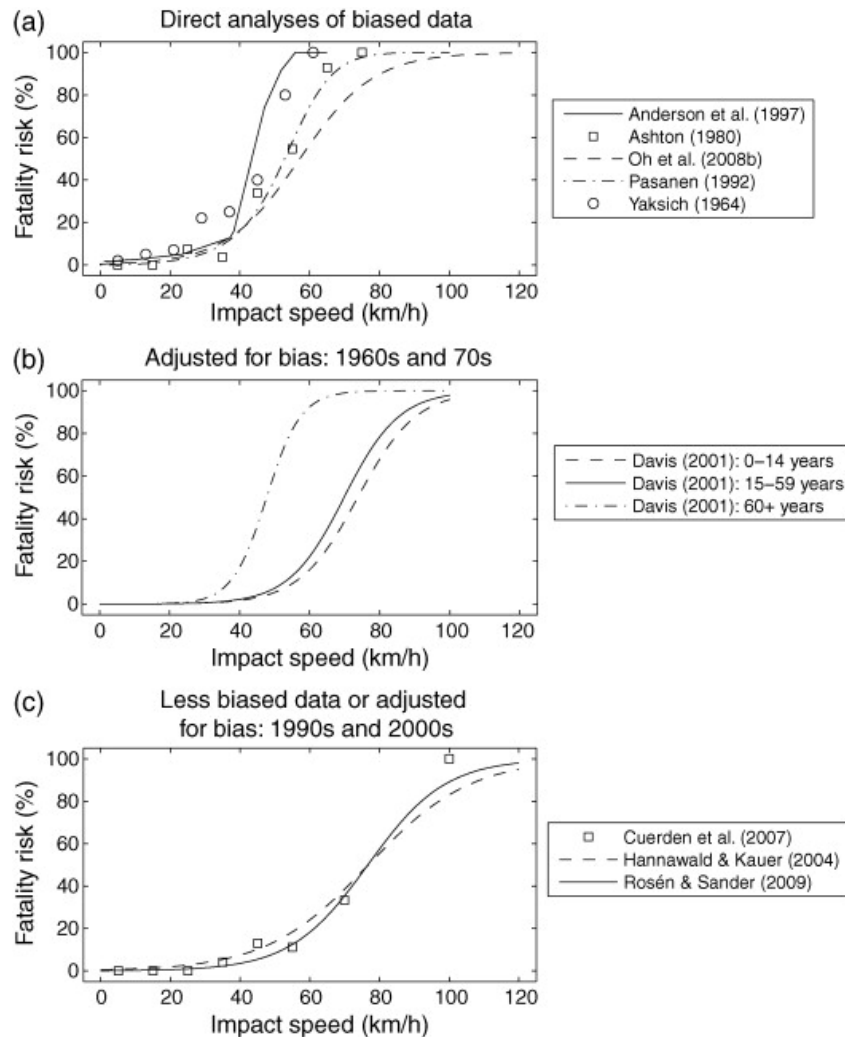


Image 3: Graphs demonstrating the fatality risk of being struck by a vehicle at different speeds (Rosén, Sander, Stigson - 2011).

Throughout Britain and Europe, 30km/h is becoming much more popular. In some cities, speed limits as low as 10km/h are in place in 'home zones'. Even in the United States, where car is king, 25 mph (40km/h) limits are common in urban areas and 15 mph (24km/h) limits are rigorously enforced at schools.

Where appropriate, it is open to the council to use 40km/h as a compromise between 50km/h and 30km/h. Use of 40km/h is outlined in the Department of Transport memo 'Guidelines for the Application of Special Speed Limits 2010'.

3.0 Dublin Cycling Campaign Proposals

3.1 Potential for Zones with 30 km/h Speed Limits

There can be little argument against 30 km/h speed limits in dense residential areas like Ongar, Tyrrelstown and Castlecurragh in Blanchardstown, Moylaragh in Balbriggan or Applewood in Swords. Indeed, there is no need, demand nor ability to travel at 50 km/h or higher on many of those streets and therefore we propose that the bye-laws be revised to reduce the speeds on those streets. As many of these routes are not through routes, the effect on journey times is negligible.

On those roads that are capable of being used as through routes, but which actually perform a home zone, retail or similar functions, individual streets may need to be assessed. The experience in London has been that where 30 mph (51 km/h) speed limits have been retained on main streets, that these streets are the ones with the most collisions / casualties per kilometre due to their high usage. This means that in certain 'village' type situations, lower limits are appropriate, e.g. the centres of Blanchardstown, Balbriggan, Swords & Malahide and parts of the Blanchardstown Centre, where pedestrian activity is higher and sight limits are often reduced.



Image 4: Map of Islington Borough, London showing (left) main roads (which retain 30mph (51 km/h) speed limits) and (right) Fatal and Serious Injury Collisions over a 3 year period from 2009-2012 (Islington Borough 2013)

3.2 Potential for Individual Roads with 30 km/h Speed Limits

Further, we would like to propose that periodic 30 km/h zones be implemented at the vast majority of schools and other places of assembly (cinemas, theatres, community centre, religious buildings, etc.), in particular those that have large numbers of people arriving and / or departing at the same time.

In such situations, the 'herd' mentality can lead to people engaging in thoughtless behaviour resulting in a lack of observation, which can in turn lead to dangerous situations.

Such changes are important, in particular in light of the low average age of the Fingal population and the large number of new schools that have been built in recent years. There are approximately 130 schools in Fingal - www.education.ie/en/Find-a-School/

3.3 Potential for Roads with Dual Speed Limits

It is exceptionally unsafe and threatening for cyclists to be passed by buses and taxis at much higher speeds at close distance. On certain routes, in particular the Navan Road, Swords Road and other roads used by cyclists, but do not have cycle lanes / paths, the existing limit may be inappropriate.

3.4 Potential for Roads with 50 and 60 km/h Speed Limits

The vast majority of rural roads in the county have speed limits of 80 km/h. While some of these roads are genuinely rural, there are a large number of roads with substantial residential frontage (typically without footpaths) or are otherwise unsuitable for 80 km/h speed limits, e.g. poor line of sight, excessive narrowness, sharp bends and roadside hazards.

It may be appropriate to have a lower limit in those traffic lanes, as provided for in Section 9(1) Road Traffic Act 2004, outlined in the Guidelines for the Application of Special Speed Limits, and as adopted by Dún Laoghaire-Rathdown County Council on the N11.

South Dublin County Council, in their speed limit bye-laws have essentially divided the county in two, with urban and rural zones, with default speed limits of 50 km/h and 60 km/h respectively. Individual roads then have different higher or lower speed limits. This would be a useful model for Fingal to use, with urban zones

- From Lucan to Swords to Howth (excluding the airport).
- From Donabate to Skerries, covering the entire area east of the railway line and some adjacent areas, in particular Lusk
- Individual zones for Balbriggan and the villages in the north west of the county.

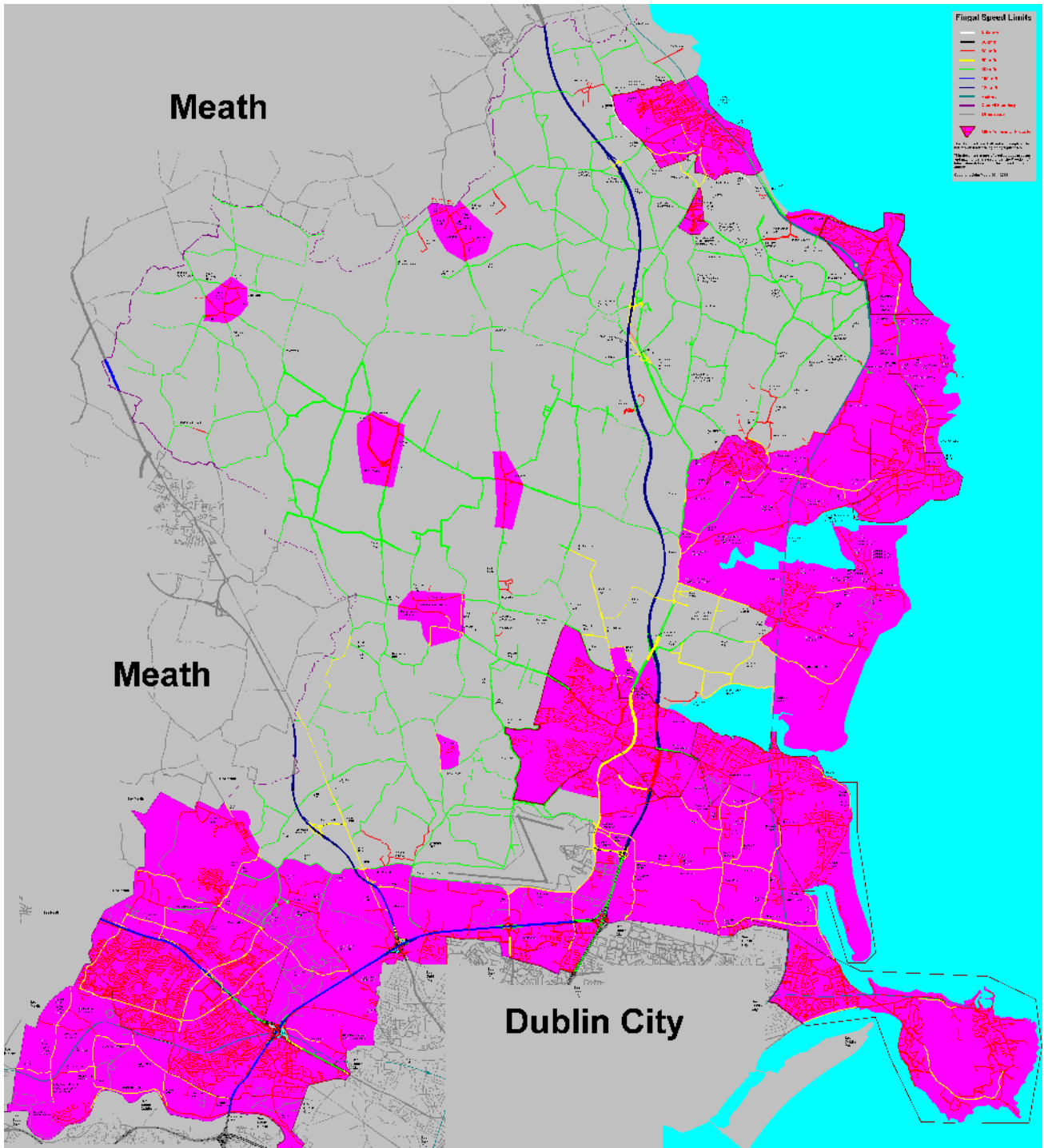


Image 5: Map of potential speed limit zones in Fingal. Certain individual roads would have higher or lower speed limits. This map is meant as a discussion point only and each road or zone would need to be assessed on its own merits.

3.4 Potential for Roads with Higher Speed Limits

Certain roads, e.g. the M1 at Swords, parts of the R132 or the new road at Stephenstown in Balbriggan have the potential for higher speed limits.

We would propose that limits of 60, 80 and 100 km/h be used cautiously and sparingly, so as to minimise risk to vulnerable road users and to also minimise community severance.

Care will need to be taken when building new roads to ensure they have an appropriate speed limit applied.

4.0 Comments on the Existing and Draft Bye-laws

4.1 Speed Limit Map

The county-wide map that has been produced as part of this consultation needs to be checked in certain areas to make sure it reflects the correct position. The shading on the map is incorrect at locations such as the West Link Bridge on the M50, at Naul and Balrothery. There may be other locations.

It should be indicated in the bye-laws as to whether the schedules or the map(s) are dominant. It is probably preferable for the schedules to be dominant.

4.2 Periodic Speed Limit at Carrickhill, Portmarnock

We would like to welcome the proposal for a periodic 30 km/h zone Portmarnock Community School. It would be useful if such limits were implemented at a wider range of locations.

It would be useful if the schedule for Drawing 24 was revised into the format of a table with columns for locations, times and dates. As it stands, the bye-laws fail to state a date and time when the periodic speed limit applies.

The bye-laws may need to be revised to ensure a robust method of implementing the speed limit, e.g. deciding the times for the operation of these limits, and for their occasional adjustment, may need to be decided by managerial order or other manner rather than by bye-laws.

4.3 M1 Lusk Services

It needs to be considered if the service area constitutes part of the motorway. It would be useful for the bye-laws to specifically address the matter.

4.4 M50 Works Area at Castleknock

It needs to be considered if the works area, at the former West Link Toll Plaza, constitutes part of the motorway. It would be useful for the bye-laws to specifically address the matter.

4.4 Balbriggan Town

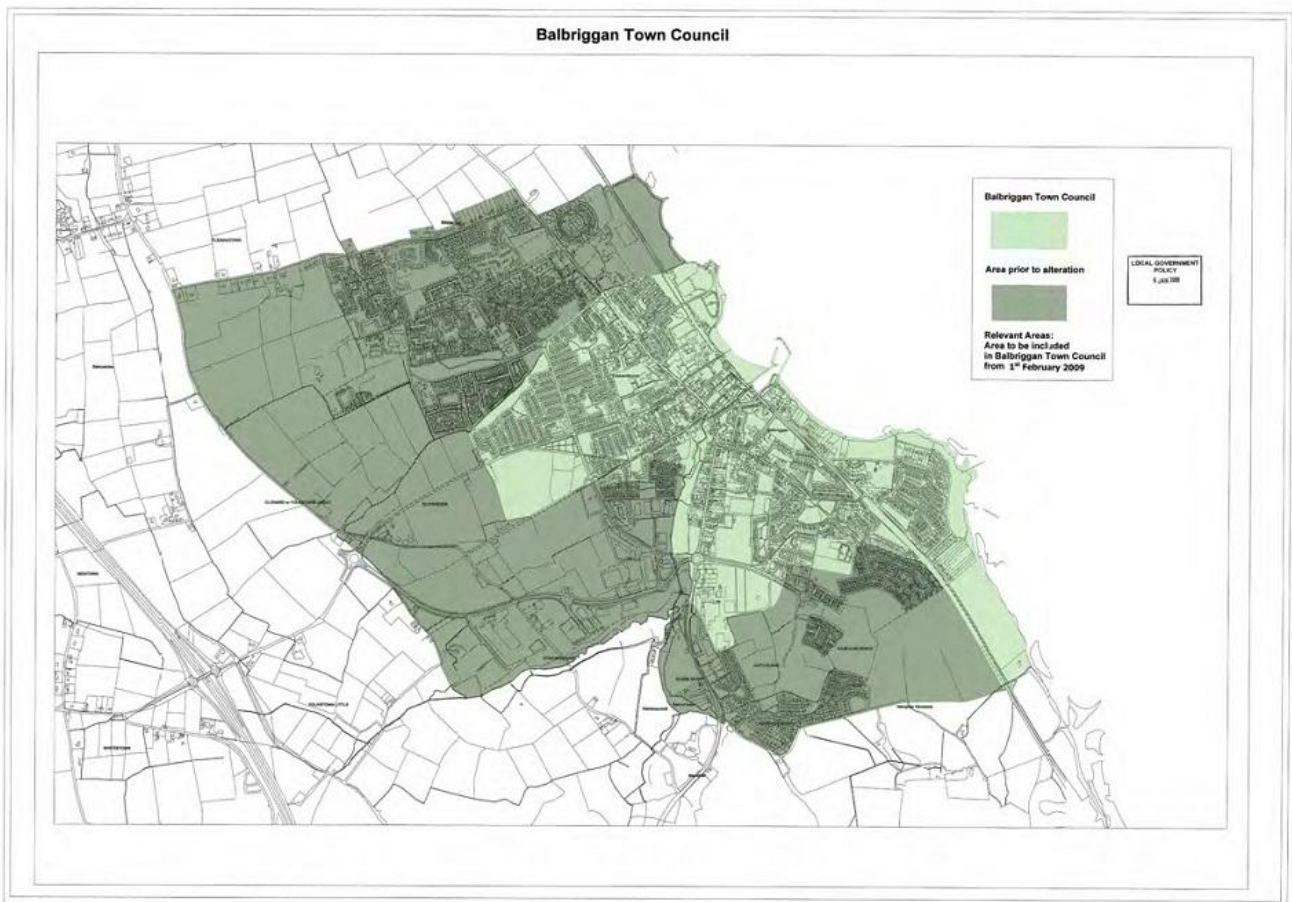


Image 6: Map from Balbriggan Town Boundary Alteration Order 2009 (S.I. No. 17/2009) showing the new extent of the town.

Section 5 of Road Traffic Act 2004 states:

"5.—(1) There is a speed limit ("built-up area speed limit") of 50 kilometres per hour in respect of all public roads, other than a motorway in built-up areas for all mechanically propelled vehicles.

(2) The built-up area speed limit does not apply to a road or part of it in a built-up area where a special speed limit or a road works speed limit applies to that road or part."

This would seem to imply that all roads within the new town boundary changed to 50 km/h in 2009 when the Balbriggan Town Boundary Alteration Order 2009 (S.I. No. 17/2009) went into effect, save those roads specified in the 2002 bye-laws - that is part or all of:

- Bremore Lane (also known as Bremore Road also known as Flemington Lane – there may be confusion with what is locally known as Bell's Lane, which is east of the Drogheda Road),
- Chancies housing estate,
- Drogheda Road,
- Dublin Road,
- Harry Reynolds Road (also known as Balbriggan Inner Relief Road),
- Hill Road (location unclear, possibly Clonard Hill - the western extension of Clonard Street),
- Mill Lane,
- Old Drogheda Road (also known as Dublin Road), at Tannerswater Lane,
- Skerries Road (also known as Skerries Coast Road),
- Tannerswater Lane (also known as Tanners Water Lane),
- White Hart Road (also known as Whiteheart Road).

It isn't clear from the map in the ministerial order if the road (Bridgefoot Road?) from Flemington Lane to Naul Road at Clonard Cross is wholly within the town boundary.

Legal opinion should be sought on the current position and the bye-laws revised to bring clarity.

4.5.0 Grade Separated and Complicated Junctions

There are a limited number of grade separated and / or complicated junctions in the county, in particular on the M1, N/M2, N/M3, M50 and R132. These junctions have not been comprehensively dealt with in the bye-laws and some corrections and changes are needed. In particular, the speed limit of on- and off-ramps should be the speed limit of the road that they are joining. Several of these routes have further complications as they are at or near the county boundary.

The definition of the start and end point of limits is occasionally problematic. It may be useful to make these definitions in relation to a fixed point, e.g. a bridge and measured along the median.

4.5.1 M1 / M50 / R139 (Previously N32) - Coolock Lane Interchange to Turnapin / Clonshaugh

For these roads:

- The exact location of the county boundary needs to be established.
- The names of each section of road need to be clarified.
- Clarity needs to be given to each of the slip roads, as there may be ambiguous zones at the interchanges.
- Speed limits need to be specified for each road and slip road.

The naming and numbering of the roads from the Coolock Lane Interchange to Turnapin / Clonshaugh (also Clonshagh) is complicated.

In the mid-1980s, the Santry Bypass was originally built from Shantalla Road to the Coolock Lane Interchange. This was extended to the airport in the late 1980s in what generally became known as the "Airport Motorway", but was also known as the "Airport Road", "Santry By-Pass Extension" and "Santry Bypass Stage 2". While it was originally part of the M1, the section from the Dublin Port Tunnel to the interchange at Clonshaugh became part of the M50 when the tunnel opened. The section from Shantalla Road to the Coolock Lane Interchange, which was completely replaced by the port tunnel works now appears to be the N50 – see Roads Act 1993 (Classification of National Roads) Order 2012 (S.I. No. 53/2012).

From the Coolock Lane Interchange to Clonshaugh, the county boundary is approximately the eastern side of the M1 motorway – see Local Government (Reorganisation) Act, 1985 - First Schedule, Part III. The M1 was widened as part of the Dublin Port Tunnel Project and the exact position of the county boundary relative to the motorway should be checked and appropriate changes made to the bye-laws, if necessary.

In the 1990s, the Northern Cross Route was constructed from the Navan Road (N3) to Clonshaugh, causing the closure of the eastern section of Turnapin Lane (from approximately the M1 to as far as Clonshaugh Road / Belcamp Lane at Clonshagh Bridge / Bewley's Hotel). While the section of the motorway west of the M1 is generally known as the "Northern Cross Route" (M50) and the section from Clonshaugh to Malahide Road is known as the "Northern Cross Route Extension" (R139, previously N32), it is also known as the "Northern Cross Route" and "Clare Hall Road". The eastern section largely replaced Belcamp Lane. The name of the central section from the M1 to Clonshaugh Road is unclear. The Roads Act 1993 (Classification of National Roads) Order 2012 made the section from the M1 to Clonshagh Bridge a spur of the M50, although it was previously referred to as the N32/M32. The city-county boundary straddles this road and the roundabout at Clonshagh Bridge. It is unclear if Belcamp Lane or Baskin Lane forms the division between Stockhole Lane and Clonshaugh Road.

The names of each of these roads needs to be clarified in parallel with the revision of the bye-laws and it might be open for the council to consider a minor amendment to the city-county boundary to simplify management of these roads.

4.5.2 R132 Interchange at Five Roads (Lusk-Balbriggan)

When the Balbriggan Bypass opened in 1998, it stretched from Five Roads (Hedgestown and Jordanstown townlands) to Gormanston, Co. Meath. When the Airport to Balbriggan Motorway opened in 2003, both the Five Roads and Gormanston Interchanges were bypassed and the section from Five Roads to the Balbriggan South Interchange (Rowans Little townland) was closed to all traffic, with some changes to traffic flows.

As the road layout has changed, it is difficult to interpret parts of 2002 bye-laws. Therefore a revision would be useful.

4.5.3 M50 Interchanges

Legal opinion should be sought on the legality of having 30km/h speed limits at various interchanges.

4.6.0 M1 Motorway

4.6.1 M1 at Swords

The 2002 bye-laws created a 30 mph zone around Swords. In 2005, this became a 50 km/h zone, by virtue of the Road Traffic Act 2004. In 2003, when the Airport to Balbriggan Motorway opened, no revision was made to the bye-laws. This means that on two sections of the M1 east of Swords the speed limit is 50 km/h. This should be revised.

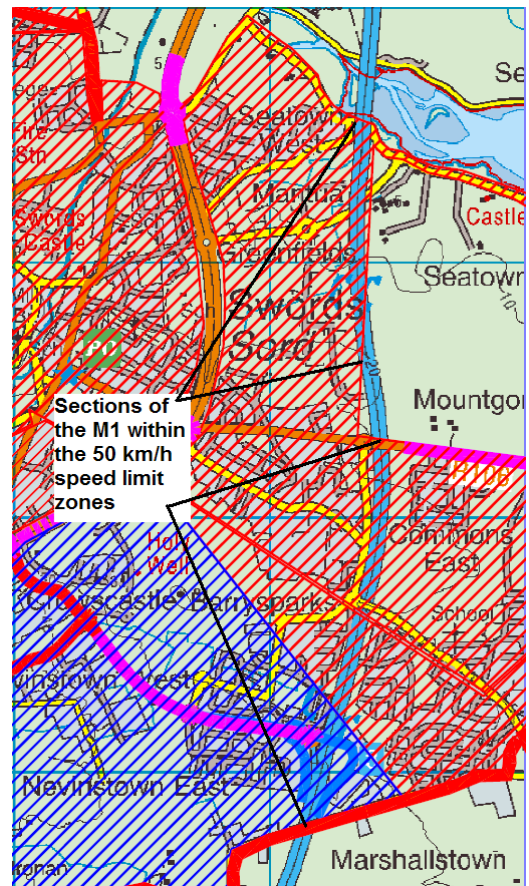


Image 6: Map from Swords indicating the sections of the M1 within the existing (red hatching) 50 km/h speed limit zones and the new (blue hatching) 50 km/h speed limit zone.

4.6.2 Proposed Speed Limit M50-M1 Coolock to Lissenhall (not part of this consultation)

From M50 Junction 2 at Coolock Lane to M1 Junction 2 Dublin Airport, there are persistent problems with weaving traffic on the northbound carriageway as traffic from Ballymun heads towards Swords as Dublin Port Tunnel traffic heads towards the airport. This sometimes brings traffic to a complete halt at rush hour.

Southbound, the Port Tunnel can be subject to constraints (lane closures, 50km/h speed limits). In addition, at 10am each morning drivers can be seen to slow to inappropriate speeds just before the toll changes from €10 to €3.

Previous bye-laws specify an 80 km/h per hour speed limit for this section. In any revision of the speed limits on the M1-M50, this speed limit should be retained or alternatively a variable speed limit applied, as exists in the Port Tunnel.

We query the proposals at several interchanges to have speed limit changes jumping through several speed limit categories, e.g. from 50 km/h to 120 km/h or from 100 km/h to 50 km/h. This may lead to individual vehicles having radically different speeds in close proximity to each other and is contrary to the guidelines issued by the Department of Transport, Tourism & Sport which suggest no jump of more than 40km/h.

4.7 Corrections and Amendments

There are a large number of minor typographical & technical errors, consistency and style issues in the bye-laws. Some roads and locations are incorrectly or poorly identified. It would be useful to change the very long paragraphs into series of bullet points to aid readability.

There are problems with the following names and words

- Ballycoolen -v- Ballycoolin
- Doorogue -v- Dooroge
- Portrane -v- Portraine
- Fieldstown Bridge West -v- Fieldstown West Bridge -v- Fieldstown Bridge
- Hanna's Avenue -v- Hannah's Avenue -v- Hannaha's Avenue
- Drynam -v- Drinan
- By-Pass -v- Bypass

Please find attached 'Appendix A - Drawing Comments' and 'Appendix B - Bye-law Comments', which contain marked-up copies of the drawings and bye-laws, in which we make detailed comments on mostly minor corrections and amendments. There is the potential to put the bye-laws and schedules in logical alpha-numeric order – default speed limit, 30, 50, 60 & 80 km/h, special circumstances, etc.

5.0 Other Bye-Laws

Other bye-laws should be checked to ensure that appropriate speed limits exist in certain Fingal County Council and other housing estates / apartment developments, parks, beaches and harbours, industrial estates and other areas.

A question arises as to whether these roads are public roads in the context of the Road Traffic Acts.

6.0 Adjacent Local Authorities

In accordance with Section 9 of the Road Traffic Act, 2004, speed limit bye-laws in adjacent counties should be checked against these proposed bye-laws.

7.0 On-street Signage and Traffic Calming

A survey should be carried out to ensure that all existing speed limit boundaries are properly marked. Further, it may be useful to both emphasise those boundaries, e.g. by on-road markings or 'gateway' treatments. Further, there may be a need to reinforce those limits through the intermittent use of repeater signage.

8.0 Conclusion

Dublin Cycling Campaign fully supports lower speed limits in pedestrian- and cyclist-rich areas. We see the proposed bye-laws going a long way to achieving this, but there is scope for further reductions.

We would like to generally support the expansion of the number of roads in Fingal with lower speed limits, as proposed in the revised bye-laws. We look forward in due course to further bye-law revisions to deal with some other roads where the speed limit is too high or too low or where other changes are needed. It would be useful for there to be a single set of bye-laws to cover the entire county, instead of the current / proposed 6-7 sets.

We are grateful for this opportunity to contribute to the review of these bye-laws and would appreciate consideration of the issues we have raised. We would be grateful for any feedback from the council or its officials, especially where our proposals or suggestions have not been adopted.