



**Love 30,  
the Campaign  
for 30 km/h  
Speed Limits**

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**Cork County Council  
Speed Limit Review 2021 - 2022  
Pre-draft Consultation**

**Submission by  
Love 30, the Campaign for 30 km/h Speed Limits  
19 July 2021**



## 1 Summary

Love 30, the Campaign for 30 km/h Speed Limits, wholeheartedly welcomes Cork County Council's invitation to members of the public to submit proposals at the Pre-Draft Consultation Stage of its Speed Limit Review.

Love 30 recommends that 30 km/h should be the default urban speed limit in all built-up areas throughout Cork County, with exceptions for specific roads, as required by the Stockholm Declaration of February 2020.

Should it not prove feasible to introduce a default 30 km/h immediately, Love 30 recommends that 30 km/h speed limits be introduced in all residential estates & other residential roads, in town, village & other 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.

## 2 Who We Are

Love 30, the Campaign for 30 km/h Speed Limits, 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:

- Cork Cycling Campaign
- Cork Transport and Mobility Forum
- Bike-Friendly Bandon
- 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
- Limerick Cycling Campaign
- An Taisce
- An Taisce Green Schools
- Irish Pedestrian Network
- WexBUG
- Politicians from across the political spectrum support the campaign.



*Image 1: All ages should be able to safely cycle in company and the 8-80 age cohort should be able to safely cycle independently.*



*Image 2: Children should be able to walk to and from school, play in their neighbourhood, visit grandparents, and go to the local shop.*

### 3 Default 30 km/h in compliance with Ireland’s obligations under the Stockholm Declaration

Ireland is a signatory of the “Stockholm Declaration”<sup>1</sup> of the Third Global Ministerial Conference on Road Safety: Achieving Global Goals 2030 Stockholm, 19–20 February 2020. In paragraph 11 it commits to “Focus on speed management, including the strengthening of law enforcement to prevent speeding and mandate a maximum road travel speed of 30 km/h in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe, noting that efforts to reduce speed in general will have a beneficial impact on air quality and climate change as well as being vital to reduce road traffic deaths and injuries;”

The General Assembly of the UN in September 2020 endorsed the Stockholm Declaration as key to delivering its Sustainable Development Goals 2030 in its 2nd Decade of Action for Road Safety.

Love 30 urges Cork County Council to comply with Ireland’s obligations under the Stockholm Declarations and introduce a default 30 km/h speed limits in all built-up areas in the County with exceptions being made only for those roads where there is strong evidence that higher speed limits are safe.

30 km/h is rapidly becoming the norm in built-up areas throughout Western Europe and in many other parts of the world. Wales, Spain, and the Netherlands are providing for a national default 30 km/h speed limit.

Love 30 urges Cork County Council to follow this international example and show the lead in Ireland in complying with obligations under the Stockholm Declaration by making 30 km/h the default speed limit in all built-up areas in the County.

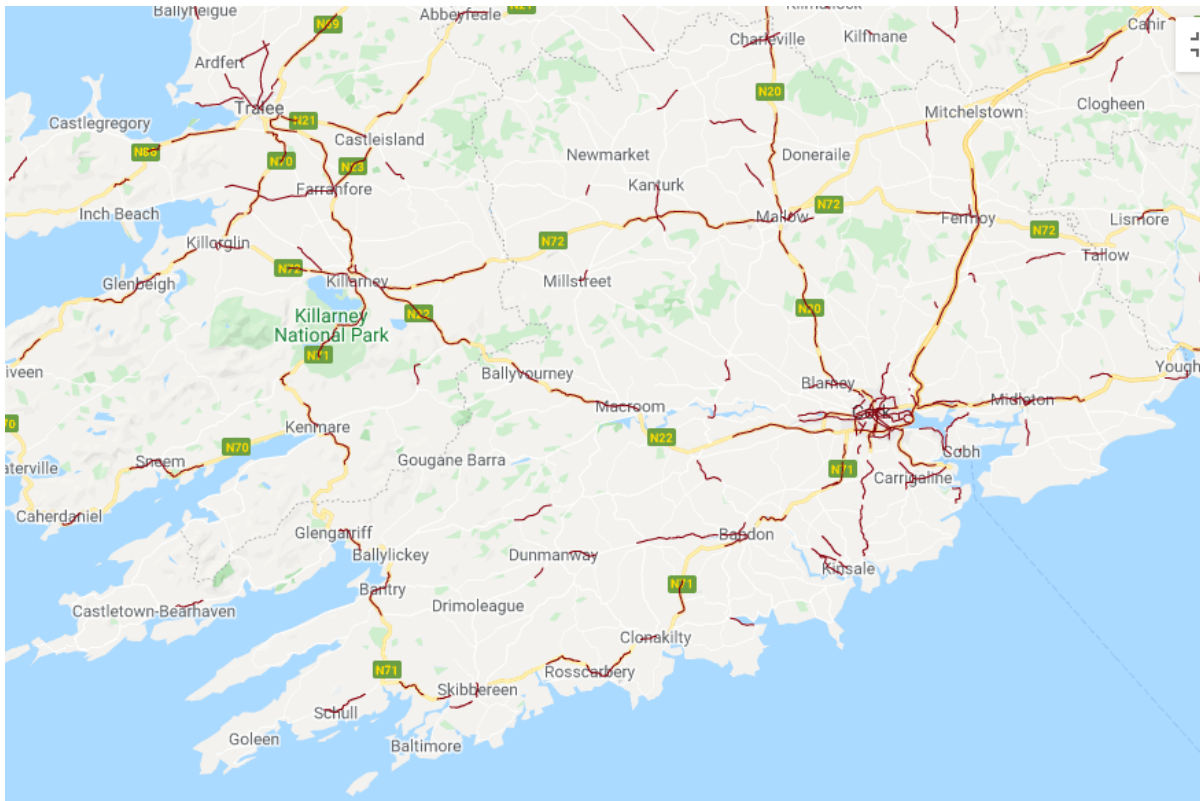
Should this prove not to be possible at this stage the following changes should be implemented now:

1. Ultimately, 30 km/h should be the default urban speed limit in all areas throughout Cork County, 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 leaving at the same time.

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<sup>1</sup> See <https://www.roadsafetysweden.com/contentassets/b37f0951c837443eb9661668d5be439e/stockholm-declaration-english.pdf>

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 whole towns and villages, 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.
6. Safety Camera (GoSafe) Zones in Cork County are highly correlated with major roads - see Image 1. While there are identifiable issues with 'legacy' roads, the bye-laws and any associated measures should also consider modern national routes and motorways.



**Image 3:** Map of Safety Camera (GoSafe) Zones in Cork County from <https://www.garda.ie/qosafe.html>

#### 4 Potential for Additional 30 km/h Speed Limits

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. Fingal will join this list in September 2021. We urge Cork County Council to follow this lead and to extend 30 km/h or other low speed limits to all residential roads and neighbourhood centres.

In section 8 below, we set out the case for 30 km/h speed limits

#### 5.1 Comments on Existing and Prospective Bye-law Text and Maps

Speed limits in Cork are set by the Road Traffic Act 2004, Cork County Council bye-laws and any surviving ministerial regulations from before 1994.

The most recent bye-laws are the:

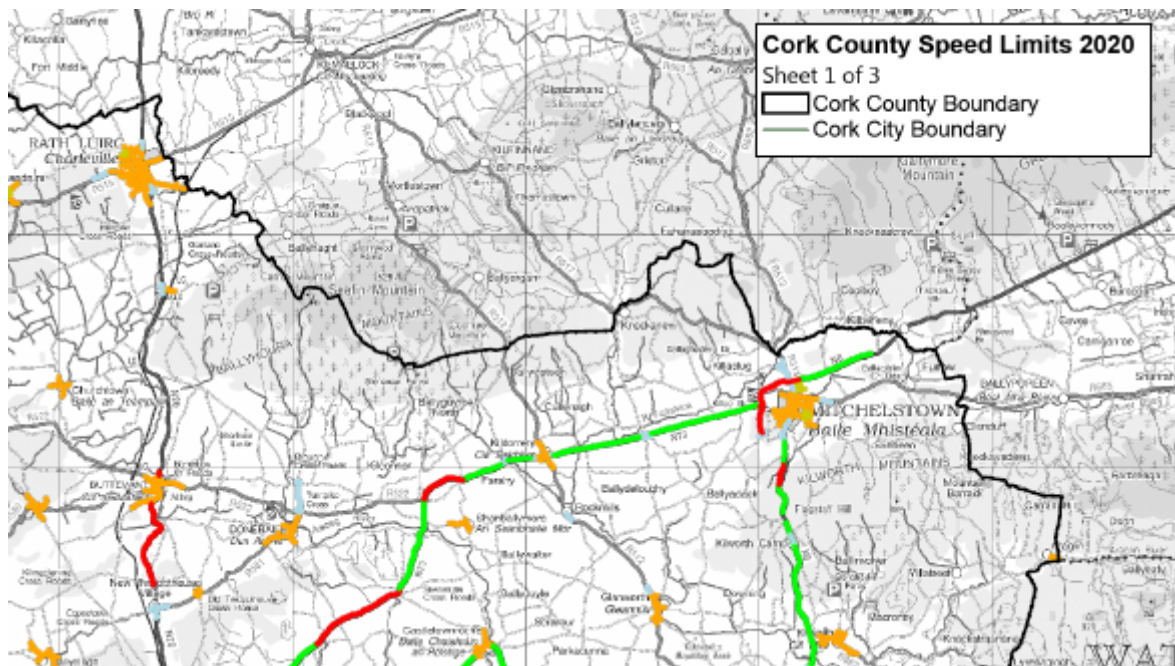
- County of Cork Road Traffic Special Speed Limit Bye-Laws for Regional & Local Roads, 2020
- County of Cork Road Traffic Special Speed Limit Bye-Laws for National Roads, 2020



There were earlier bye-laws in 2011, 2015, 2017, 2018 & 2019. It should be checked that these and any earlier bye-laws or regulations have been comprehensively repealed. Some of the 2011 bye-laws appear to be current.

Additional draft bye-laws dealing with speed limits in housing estates were put to public consultation in 2020, but their status is not clear.

The current bye-laws consist of 264 pages of text and are distinctly unwieldy. The text is available here: <https://www.speedlimits.ie/cork-county-council> The number of maps is unknown, but probably runs to approximately 200. Other than three high-level maps of the whole county, the maps are not published.



*Image 4: Style of map that is publicly available.*

Given that Cork is Ireland's largest county by area, largest council by area and second largest council by population, it is appropriate that the bye-laws are split into several documents. However, the existing split between (a) national roads and (b) regional & local roads is not ideal and a geographic split may be more appropriate. Such a split might be along the lines of the existing geographic split of the county into North, South and West areas for certain council purposes. Splitting along the lines of the eight municipal districts would probably be excessive, given the larger number of such areas and the erratic shape of some of them. There may be other options.

Changing to a geographic split would make it easier to deal with changes along a national road, as only one set of bye-laws would need to be changed at a time. It would also make the work of revisions easier, as it would mean that only part of the county would need to be dealt with at any given time.

Neither amendment bye-laws, nor bye-laws for a specific purpose, e.g. for a specific location or for housing estates generally, are desirable and should be avoided if possible. However, they may be necessary at some point in the future. To avoid unnecessary confusion, there should only be a single set of such bye-laws at any given time. Publishing unannotated consolidations is unacceptable.

## 5.2 Exempted Drivers

The existing bye-law provisions for exemptions for emergency vehicle drivers are 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). Section 87 applies whether it is mentioned in the bye-laws or not. Moreover, the provision as presented in the May 2020 draft is poorly drafted and could be open to abuse. We recommend that that any such provision 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.”*

## 6 Public Consultation

It is good to see that the bye-law public consultation was included on both the council’s website and a variety of media. However, it is disappointing that it was not included on [www.speedlimits.ie](http://www.speedlimits.ie)

It is disappointing that there is no coherent public map of existing speed limits that would inform the public consultation. It will be important for the consultation that meaningful maps are available. The maps<sup>2</sup> produced by Fingal County Council for their public consultation in 2020 were better than most other maps.

As soon as is practical, Cork County Council should confirm what bye-laws (and pre-1994 regulations, if any) are current and publish all related documents (text and maps) in a machine-readable format on a single page on its website. The maps should have the former town boundaries (these define the extent of the default ‘Built-up area speed limit’) and the new Cork City boundary marked. The delineation of the new Cork City boundary on published maps lacks preciseness. However, this map provides general clarity: <https://www.arcgis.com/apps/webappviewer/index.html?id=570fc5da59ca4b60b6e8fede282881bf>

The current practice of only publishing scanned versions of the bye-laws that are not machine-readable is unacceptable, as (a) it makes it impossible for people with sight difficulties to use screen readers (text-to-voice software); (b) some details are lost; (c) some pages are out of sequence (d) searching for specific words or phrases impossible and (e) it makes participation in the public consultation more difficult than it should be. This is contrary to Section 42 of the Irish Human Rights and Equality Commission Act 2014<sup>3</sup>.

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<sup>2</sup> See <https://consult.fingal.ie/en/consultation/road-traffic-speed-limits-county-fingal-proposed-bye-laws-2020>

<sup>3</sup> See <http://www.irishstatutebook.ie/eli/2014/act/25/section/42/enacted/en/html>

## 7 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 often 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<sup>4</sup>).

### 8.1 Background - The Case for 30 km/h Speed Limits

Love 30 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.

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<sup>4</sup> See <https://www.speedlimits.ie/>

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<sup>5</sup>] 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 allow 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.

## 8.2 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 show 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**

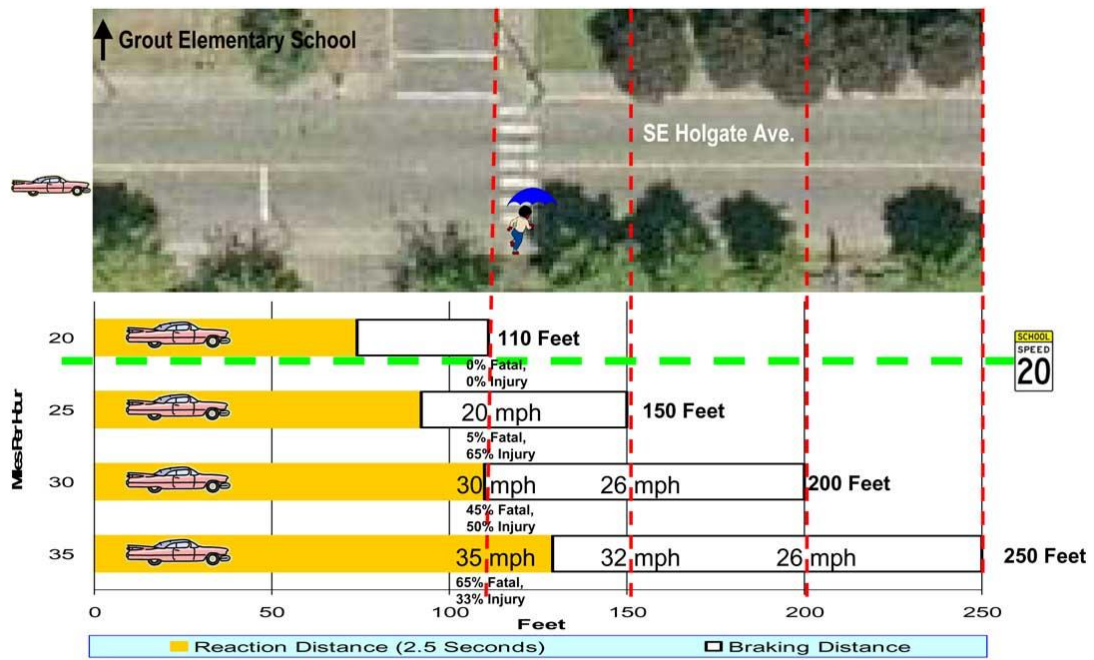


**Image 5:** Illustration from the Road Safety Authority showing the impact of vehicle speeds on pedestrian fatalities.

<sup>5</sup> See <http://www.esri.ie/pubs/BKMNEXT211.pdf>



# EFFECTS OF SPEED ON STOPPING DISTANCE



District Coalition - Southeast Uplift Neighborhood Association



Image 6: Image shows how lower speeds can minimise stopping distances for cars, thereby preventing collisions.

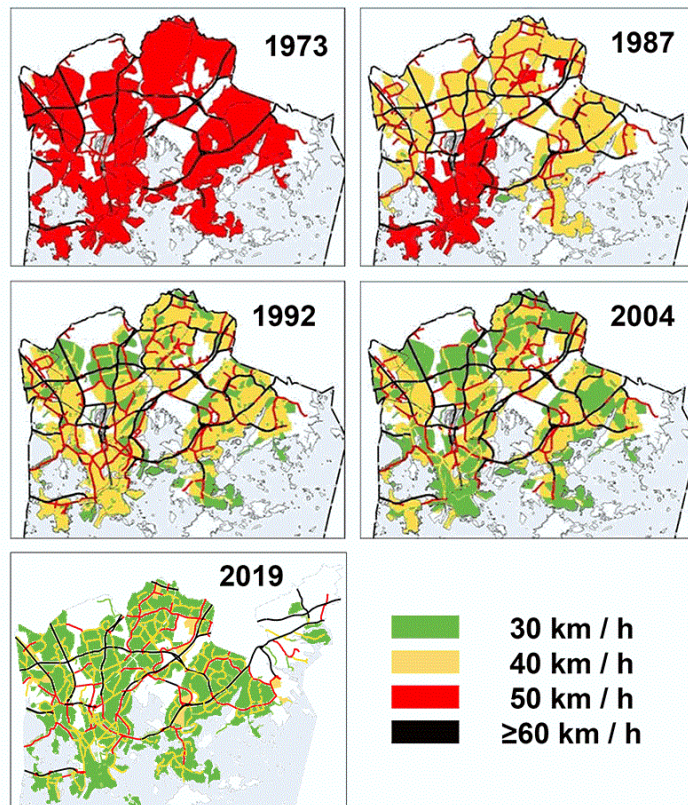


Image 7: Evolution of 30 km/h speed limits in Helsinki, Finland. Speed management in Helsinki, Dr Eero Pasenen, Aalborg University, 2004 and Helsinki City Council 2019.

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’.



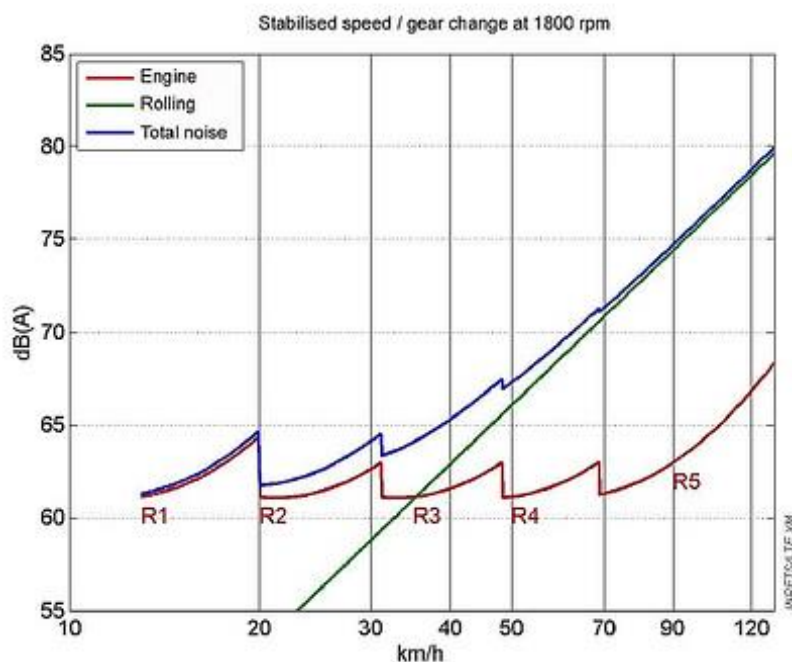
**Image 8:** Village scene with older people, wheelchair and pram users, pedestrians, dog walker, shoppers, cyclists, and motorists. All will benefit from the safety and environmental benefits.

In the UK, where 20 mph is the equivalent of our 30 km/h, the “20’s Plenty for Us” Campaign ([www.20splenty.org](http://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](http://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 is not 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 9: 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 needed to help us meet transport greenhouse gas emission targets.

The Department of Transport Tourism & Sport's Design Manual for Urban Roads and Streets<sup>6</sup> (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 the facilities in their community and not be intimidated by traffic.

<sup>6</sup> See <https://www.dmurs.ie/copy-of-what-is-dmurs>