



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

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**Draft Road Traffic Special Speed Limit Bye-Laws 2021
(Croom L-8070-1 and L-8070-2)**

**Submission by
Love 30, the Campaign for 30 km/h Speed Limits
11 October 2021**



1 Summary

Love 30, the Campaign for 30 km/h Speed Limits, welcomes Limerick City and County Council's proposals to apply 50 km/h speed limit on several roads in Croom. However, we are disappointed that a lower speed limit was not chosen in the vicinity of a school and the limited scope of the proposals.

Love 30 recommends that 30 km/h should be set as the default urban speed limit in all built-up areas throughout Limerick, with exceptions for specific roads, as required by the Stockholm Declaration of February 2020 co-signed by Ireland. 30 km/h is the recognised safe vehicle speed where pedestrians, cyclists, and other vulnerable road users are mixing with vehicular traffic.

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 towns, villages & 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.

Love 30 is concerned that speed limits on both urban (50 km/h on Gateway Park, Elm Park Drive, Caemore Court, Maxwells Lane and other laneways) and roads with "ribbon" development (60-80 km/h on L1419 and L14191 at side of cemetery) are excessively fast and recommend that they be reduced.

In the Appendix attached we have given detailed commentary on the draft bye-law text.

It is good to see that the bye-law public consultation was included on the Council's website, a variety of media and on www.speedlimits.ie



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

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 lower speed limits and 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, health groups, supporters of children’s right to walk & play, and others who recognise the benefits of lower speed limits. We are also a member group of Cyclist.ie, the Irish Cycling Advocacy Network.

Our supporters include:

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



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 Comments on Draft Bye-law Text

In the Appendix attached, we have given detailed commentary on the draft bye-law text.

Addendum bye-laws are novel and not used by other councils. Neither amendment bye-laws nor addendum bye-laws as the draft bye-laws are presented as, 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. To avoid unnecessary confusion, ideally there should only be a single set of such bye-laws at any given time. With this draft, it is proposed that Limerick have a total of four sets of speed limit bye-laws simultaneously and this risks having errors and conflicts.

The reasoning for the draft speed limit bye-laws is stated as "The purpose of these Bye-Laws is to accommodate for new roads in Croom County Limerick, namely the L-8070-1 and L-8070-2." These roads connect to the new campus for Coláiste Chiaráin which opened earlier in the year. Much of the new road is in a flood zone that is zoned agricultural. This means that the only traffic using the northern section of the road is agricultural or related to the school. It would seem eminently sensible to change the proposed speed limit to 30 km/h.

It is proposed to reduce the area of the 50 km/h speed limit zone around Croom (see image where the red line represents the proposed 50 km/h speed limit zone, overlaid on the existing speed limits). This has the effect of increasing the speed limit on the Limerick Road (possibly also known as Caherass Road).

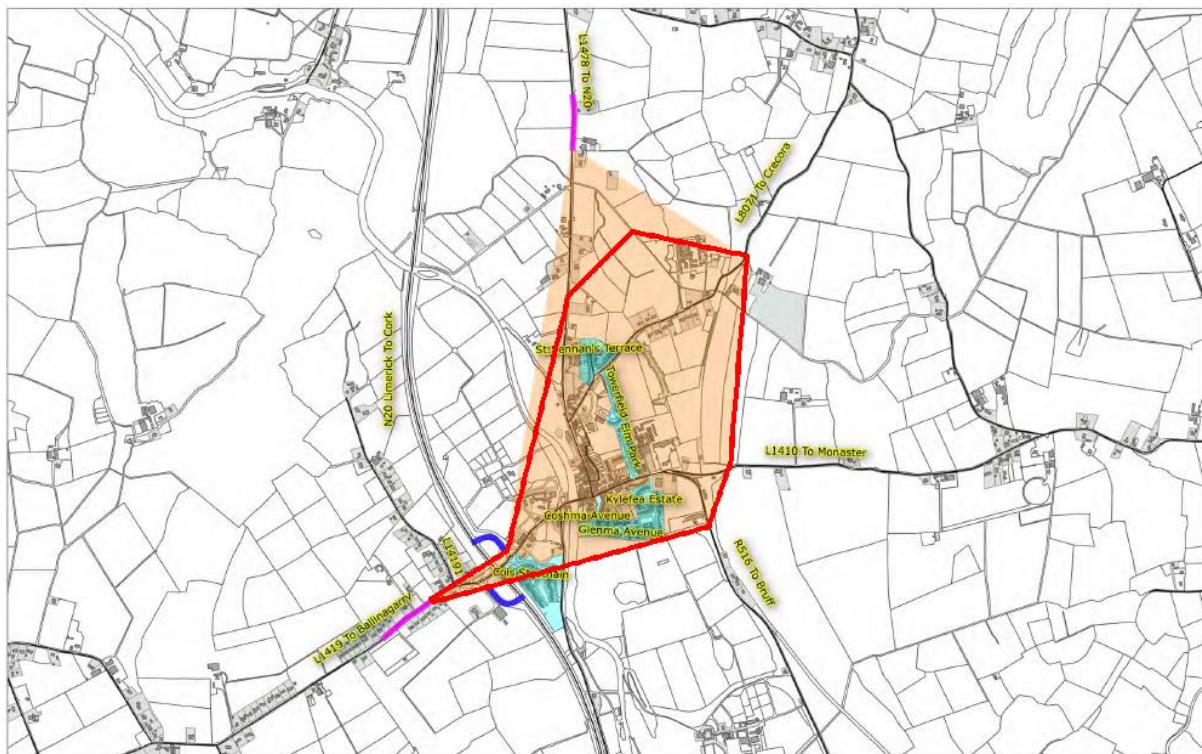


Image 3: Map of existing speed limits in Croom, with the proposed 50 km/h speed limit zone super-imposed with a red line.

No effort is being made to correct any speed limit anomalies, such as 50 km/h on residential roads (Gateway Park, Elm Park Drive, Caemore Court, Maxwells Lane and other laneways) and 60-80 km/h on roads with ribbon development (L1419 and L14191 at side of cemetery).

Check the exact title and punctuation of 2019 bye-laws – different titles are used in various parts of those bye-laws.

Ensure titles used in various parts of these bye-laws matches the title used in Bye-law 1.

The draft bye-laws use the phrase "County of Limerick". Shouldn't this be "City and County of Limerick"?

In the 2018 and 2019 bye-laws, "Crecora Road L-1408" is listed as "Crecora Road L-8071". This should be checked.

As drafted, the bye-laws create the effect of having a 50 km/h speed limit for a short section of the N20 Croom Bypass (the area within the red line / pink shading), which was avoided in previous bye-laws by using a saver paragraph. This is inappropriate and risks bringing the bye-laws and speed limits generally into disrepute.

4 Exempted Drivers

The draft 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 provisions could be open to abuse. We recommend 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.”

Appendix

1. Delete "DRAFT" watermark.
2. In the draft bye-laws, regional road numbers are variously written in the style of "R000" and "R-000". S.I. No. 54/2012¹ - Roads Act 1993 (Classification of Regional Roads) Order 2012 uses the former style exclusively.
3. In the draft bye-laws, national road numbers are written in the style of "N-00". S.I. No. 53/2012² - Roads Act 1993 (Classification of National Roads) Order 2012 exclusively uses the style "N00".
4. In the draft bye-laws, local road numbers are written in a variety of styles, some of which are likely to be incorrect.

Original Text	Comments
Limerick City and County Council Road Traffic (Croom Distributor Road Speed Limit) Bye-Law 2021	<ol style="list-style-type: none"> 5. Ensure title matches Bye-law 1. 6. "Bye-laws" – mixed-case, plural.
Addendum to the Limerick City & County Council County Limerick Road Traffic Special Speed Limit Byelaws 2019 For National, Regional & Local Roads	<ol style="list-style-type: none"> 7. Addendum bye-laws are novel and not used by other councils. 8. Ensure title matches these other bye-laws exactly. 9. Check exact title and punctuation of 2019 bye-laws. They appear to be variously referred to as: <ol style="list-style-type: none"> a. Limerick City & County Council County Limerick Road Traffic Special Speed Limit Byelaws 2019 For National, Regional & Local Roads. b. County Limerick Road Traffic Special Speed Limits (National, Regional & Local Roads) Bye-laws, 2019. c. County Limerick Special Speed Limit Byelaws 2019 for National, Regional & Local Roads.
Limerick City & County Council Road Traffic (Croom Distributor Road Speed Limit Bye-Laws 2021)	<ol style="list-style-type: none"> 10. Ensure title matches Bye-law 1. 11. Change ampersand to "and". 12. "Bye-laws" – mixed-case. 13. Correct the position of closing bracket.
Limerick City & County Council September2021 Page 2	<ol style="list-style-type: none"> 14. Change ampersand to "and". 15. Add space to "September2021". 16. Revise date.
SPEED LIMIT BYE-LAWS	<ol style="list-style-type: none"> 17. Ensure title matches Bye-law 1.

¹ See <http://www.irishstatutebook.ie/eli/2012/si/54/made/en/print>

² See <http://www.irishstatutebook.ie/eli/2012/si/53/made/en/print>

Original Text	Comments
Limerick City & County Council in exercise of the powers conferred on it by Section 9 of the Road Traffic Act, 2004 (No. 44 of 2004), hereby makes the following bye-laws in respect of the area comprising the administrative area of the County of Limerick.	18. Change ampersand to “and”. 19. Should this read “...administrative area of the City and County of Limerick”?
The maps annexed to these bye-laws are for illustrative purposes only and in the event of a conflict between the maps and the text of the Schedule hereto, the text of the Schedule shall take precedence.	20. This paragraph would be better as a numbered bye-law. 21. There are two schedules. Change to “the text of the relevant schedule” (x 2).
1. These Bye-Laws may be cited as the Limerick City and County Council, Road Traffic (Croom Distributor Road Speed Limit) Bye-Laws 2021	22. Title is unnecessarily long. Consider “Limerick City and County Council (Croom Speed Limit) Bye-Laws 2021” or similar. 23. “bye-laws” – lower case (first instance). 24. “Bye-laws” – mixed case (second instance). 25. Is the comma in the title appropriate? 26. Full stop.
2. These Bye-Laws are an addendum to the Limerick City & County Council, County Limerick Road Traffic Special Speed Limit Byelaws 2019 For National, Regional & Local Roads	27. Addendum bye-laws are novel and not used by other councils. 28. “bye-laws” – lower case (first instance).
3. These bye-laws shall come into operation on the 1st day of November, 2021.	29. Check date. 30. Delete comma.
4. In these bye-laws:	
“the Act of 1993” means the Roads Act, 1993 (No. 14 of 1993);	
“the Act of 1994” means the Road Traffic Act, 1994 (No. 7 of 1994);	31. Exact phrase not used in these bye-laws and not relevant anyway. Delete.
the Act of 2001 means Local Government Act 2001;	32. Exact phrase not used. Consider deleting. 33. Put quotation marks around “the Act of 2001”.
“the Act of 2004” means the Road Traffic Act, 2004 (No. 44 of 2004);	34. Exact phrase not used. Consider deleting.
“The Act of 2010” means the Road Traffic Act, 2010 (No. 25 of 2010);	35. Exact phrase not used. The 2010 amendments to the 2004 act have themselves been replaced. Consider deleting. 36. Use proper quotation marks (two apostrophes used to close quote).
“built-up area” has the meaning assigned to it in the Local Government Act 2001;	37. Exact phrase not used. In any case, it is the definition in the 2004 act that is relevant. Consider deleting.
“distance” means distance measured along the centre line of a road;	38. Exact phrase not used. Consider deleting.

Original Text	Comments
"the Minister" means the Minister for Transport;	39. Exact phrase not used. Consider deleting.
"local road" has the meaning assigned to it by the Act of 1993;	40. Only used in title of other bye-laws. Consider deleting.
"regional road" has the meaning assigned to it by the Act of 1993;	41. Exact phrase not used. Consider deleting.
"national road" has the meaning assigned to it by the Act of 1993;	42. Exact phrase not used. Consider deleting.
"motorway" has the meaning assigned to it by the Act of 1993;	
"administrative area" has the meaning assigned to it in section 25(4) (a) and Part 1 of Schedule 1 of the Local Government Act 2014;	43. Check.
"mechanically propelled vehicle " has the meaning assigned to it in Section 3(1) of the Road Traffic Act, 1961;	44. Correct spacing at "vehicle".
Limerick City & County Council Road Traffic (Croom Distributor Road Speed Limit Bye-Laws 2021)	45. Ensure title matches Bye-law 1. 46. Change ampersand to "and". 47. "Bye-laws" – mixed-case. 48. Correct the position of closing bracket.
Limerick City & County Council September2021 Page 3	49. Change ampersand to "and". 50. Add space to "September2021". 51. Revise date.
"perimeter road" means a road on and along the roadway of which there runs the boundary of a county borough or a town and shall be considered as being within such boundary for the purposes of these bye-laws;	52. Exact phrase not used. Consider deleting.
"road" means a public road and includes a motorway.	
"Administrative County of Limerick" means the County and City of Limerick.	53. Exact phrase not used. Consider deleting. 54. "administrative" – lower case. 55. Should this read "...City and County of Limerick"?
5. The special speed limit for mechanically propelled vehicles on roads specified in the First Schedule shall be 30 kilometres per hour.	56. There is no such schedule. Delete.
6. The periodic special speed limit for mechanically propelled vehicles on roads specified in the Second Schedule shall be 50 kilometres per hour.	57. There is no such schedule. Delete.
7. The special speed limit for mechanically propelled vehicles on roads specified in the Third Schedule shall be 50 kilometres per hour.	
8. The special speed limit for mechanically propelled vehicles on roads specified in the Fourth Schedule shall be 60 kilometres per hour.	
9. The special speed limit for mechanically propelled vehicles on roads specified in the Fifth Schedule shall be 80 kilometres per hour.	58. There is no such schedule. Delete.

Original Text	Comments
10. The special speed limit for mechanically propelled vehicles on roads specified in the Sixth Schedule shall be 100 kilometres per hour.	59. There is no such schedule. Delete.
11. The special speed limit for mechanically propelled vehicles on roads specified in the Seventh Schedule shall be 120 kilometres per hour.	60. There is no such schedule. Delete.
12. Exceptions: The following shall be excepted from the special speed limit prescribed in these Bye-Laws:-	61. Inappropriate. Delete. 62. "bye-laws" – lower case.
(a) ambulances,	63. Inappropriate. Delete.
(b) fire brigade vehicles, and	64. Inappropriate. Delete.
(c) vehicles used by members of the Garda Síochána in the performance of their duties as such members.	65. Inappropriate. Delete. 66. Fadas – "Síochána".
Limerick City & County Council Road Traffic (Croom Distributor Road Speed Limit Bye-Laws 2021)	67. Ensure title matches Bye-law 1. 68. Change ampersand to "and". 69. "Bye-laws" – mixed-case. 70. Correct the position of closing bracket.
Limerick City & County Council September 2021 Page 4	71. Change ampersand to "and". 72. Add space to "September 2021". 73. Revise date.
THIRD SCHEDULE – 50kph SPECIAL SPEED LIMIT	74. Spelling and spacing – "50 km/h".
Roads in respect of which a special speed limit of 50 Kilometres per hour is prescribed.	75. "kilometres" - lower case.
The following roads at Croom:	
All roads in the area enclosed by a line, but excluding areas identified as 30km/h Speed Zones in existing bye-laws, commencing at a point on Croom Main Street L-1478, 533 metres north of its junction with the L-1408 Road and drawn thence in straight lines successively to the following points:-	76. This paragraph is unnecessarily vague. Revise. 77. There is no definition for "30km/h Speed Zones" in these or other bye-laws 78. There is no definition for "existing bye-laws". Does it include the bye-laws proposed in summer 2021? 79. Note that this area includes a section of the N20 mainline, with no saver.
(a) a point at termination of L-8070-2, 368m north of its junction with L-8070-1,	80. Use full word – "metres".
(b) a point on the Crecora Road L-1408, 1007 metres northeast of its junction with Croom Main Street L-1478,	81. In the 2018 and 2019 bye-laws, this is listed as "Crecora Road L-8071".
(c) a point on the Monaster Road L-1410, 268 metres east of its junction with the R-516 Bruff Road,	
(d) a point on the R-516 Bruff Road, 314 metres south of its junction with the L-1410 Monaster Road,	
(e) a point on the Limerick to Cork National Primary Road N-20 northbound off ramp, 28 metres south of its junction with the R516 Bruff Road,	82. Change "N-20" to "N20". 83. For ease of understanding change "R516 Bruff Road" to "Ballingarry Road L-1419".

Original Text	Comments
(f) a point on the Ballingarry Road L-1419, 129 metres south-west of its roundabout junction with the R516 Bruff Road.	84. "Ballingarry Road L-1419" appears to be known locally as Church Road. 85. Change "R516 Bruff Road" to "Limerick to Cork National Primary Road N20 northbound off ramp". 86. For consistency with other directions, delete the hyphen from "south-west".
(g) a point on the Limerick to Cork National Primary Road N-20 southbound off ramp, 28m north of its junction with the R516 Bruff Road and from the last mentioned point in a straight line to the commencement point on the L-1478 Road.	87. Change "N-20" to "N20". 88. Use full word – "metres". 89. "R516 Bruff Road" appears to be known locally as Church Road. 90. Hyphenate "last-mentioned".
FOURTH SCHEDULE – 60kph SPECIAL SPEED LIMIT	91. Spelling and spacing – "60 km/h".
Roads in respect of which a special speed limit of 60 Kilometres per hour is prescribed.	92. "kilometres" - lower case.
The following roads at Croom:	93. What of the Ballingarry Road L-1419?
The L1478 Road between a point 533m north of its junction with the L-1408 Road to a point 1300m north of its junction with the L-1408 Road.	94. Change "L1478 Road" to "Croom Main Street L-1478". 95. Use full word – "metres" (x 2). 96. Does this include the new house at Skagh, Croom (Eircode V35 NT93)?
Limerick City & County Council Road Traffic (Croom Distributor Road Speed Limit Bye-Laws 2021)	97. Ensure title matches Bye-law 1. 98. Change ampersand to "and". 99. "Bye-laws" – mixed-case. 100. Correct the position of closing bracket.
Limerick City & County Council September2021 Page 5	101. Change ampersand to "and". 102. Add space to "September2021". 103. Revise date.
The Limerick City and County Council Road Traffic (Croom Distributor Road Speed Limit) Bye-Laws 2021 are made and adopted under the Common Seal of Limerick City and County Council this, the ____ Day of _____, 2021	104. Check phrasing – it would be more usual to say "These bye-laws are made and adopted ...". 105. Ensure that this text matches Bye-law 1. 106. "Bye-laws" – mixed-case. 107. "day" - lower case. 108. Check spacing at comma. 109. Insert date. 110. Full stop.
THE SEAL OF LIMERICK CITY AND COUNTY COUNCIL	
Was affixed hereto by:-	
_____ DIRECTOR OF SREVICE/APPROVED OFFICER AUTHENTICATED BY:-	111. Spelling "SERVICE". 112. Add space around "/".
_____ SENIOR EXECUTIVE OFFICER/CORPORATE SERVICES	113. Add space around "/".