



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

Love 30
c/o Tailor's Hall
Back Lane
Dublin 8
D08 X2A3
Email: info@love30.ie
Web: www.love30.ie

**Road Traffic (Special Speed Limits)
(County of Offaly) Bye-laws 2023**

**Submission by
Love 30, the Campaign for 30 km/h Speed Limits
6 October 2023**



1 Summary

Love 30, the Campaign for 30 km/h Speed Limits, welcomes Offaly County Council's proposals to update its speed limit bye-laws. However, we are disappointed that a lower speed limit was not chosen in the vicinity of many schools and residential areas.

Love 30 recommends that 30 km/h should be set as the default urban speed limit in all built-up areas throughout Offaly County, 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 and roads with "ribbon" development are excessively fast and recommend that they be reduced.

In the appendices attached we have given detailed commentary on the draft bye-law text and maps.

It is good to see that the bye-law public consultation was included on the Council's website and on www.speedlimits.ie, although there seems to have been limited take-up by the media.



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
- 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 appendices attached, we have given detailed commentary on the draft bye-law text and maps.

In Appendix A, we note that:

- There needs to be 30 km/h or lower speed limits at every school.
- The First Schedule engages in an outdated procedure, declaring roads not to be public roads in the built-up area for the purpose of Section 45 of the Road Traffic Act, 1961. Section 45 has been repealed. The vast majority of councils no longer follow this procedure, as it is

unnecessary. Most of the text of this schedule can be deleted and the balance moved to other schedules.

- There are a small number of conflicts between the bye-law text and the drawings.
- Many schools and other sites appear to have revised their access arrangements in recent years and text like “Measured from the centreline of the school gates ...” may be out of date and imprecise.
- We also suggest a large number of minor changes to the text. Particular care is needed to ensure the correct names are used for roads. Some confusion arises due to roads sharing names with their townlands.

In Appendix B, we note that

- There are a large number of places where speed limits could be lower or that a low speed limit proposed by the bye-laws needs to be extended further. This relates primarily to schools and residential areas.
- This is particularly so in towns that are already bypassed, like Banagher, Edenderry and Tullamore. The investment in these bypasses should be protected by ensuring that through traffic uses the bypass, not the town centre roads.
- There may be a problem applying speed limits to the large number of housing estates that haven't been taken in charge and this should be addressed.
- There is a large amount of ribbon housing on the urban edge and in rural areas. There needs to be a prohibition on ribbon development and in particular ribbon housing on main roads and rural roads. One option would be to allow a certain amount of housing estates with large sites to satisfy this market. This allows back lands closer to town centres to be used before sites further out are used. It also makes it easier to provide services, reduces unnecessary travel demand and makes lives easier for residents.
- Some very minor roads, e.g. Clonoghill Lane in Birr have wholly inappropriate speed limits. In light of recent commentary on reducing speed limits, it is unfortunate that there has been no attempt to address this.

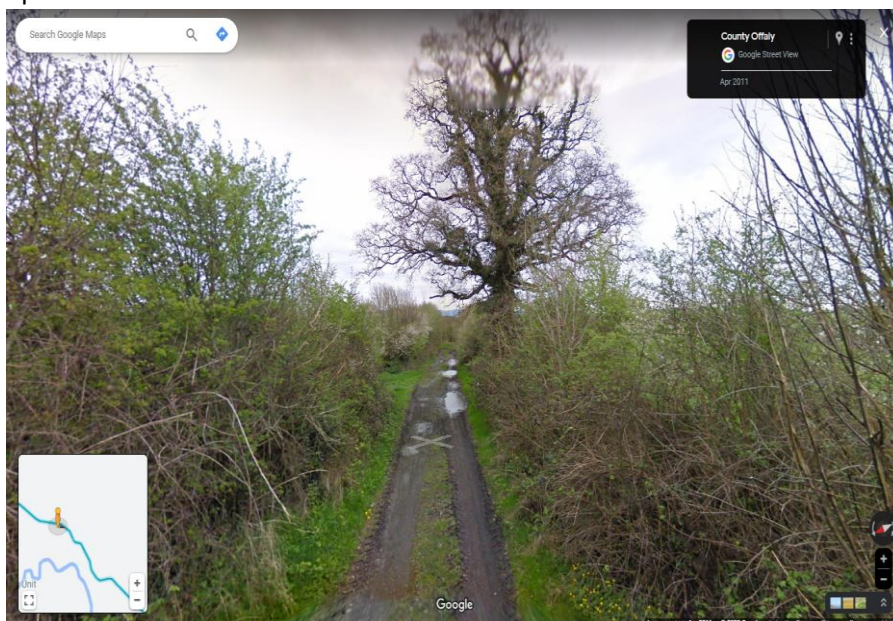


Image 3: Clonoghill Lane in Birr, where it is proposed to have an 80 km/h speed limit, despite the road not having a paved surface.

- We also note that speed limit signage, footways and junctions need improvement. Some roads may be misidentified on the maps and the absence of street name plates on site at many locations makes it difficult to correctly identify them.

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 (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.”