

### County of Louth Road Traffic Special Speed Limit Bye-Laws 2024

Submission by:

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Love 30, the Campaign for 30 km/h Speed Limits, welcomes the general proposed reduction in speed limits brought about by the Road Traffic Act 2024 and supports Louth County Council's proposed special speed limit bye-laws 2024.

We understand the council's proposals to maintain a higher speed limit on one road, but we have specific concerns about a number of locations. See paragraph 5 below.

Implementing lower speed limits on rural roads will bring numerous benefits to the County, including enhanced safety, environmental sustainability, and overall quality of life.

1. Improved Road Safety

Lowering speed limits on rural roads is a crucial step towards reducing the number and severity

of traffic collisions. Rural roads often have sharp bends, narrow lanes, and limited visibility, making them particularly hazardous at higher speeds. RSA collision data shows that between 2018 and 2021, 38% of road fatalities occurred on 80Km/h roads and 30% of serious injuries. By reducing speed limits on these roads, we can significantly decrease the risk of collisions, thereby protecting the lives of drivers, passengers, cyclists, and pedestrians.

#### 2. Environmental Benefits

Reducing speed limits can also contribute to environmental sustainability. Lower speeds typically result in reduced fuel consumption and lower emissions of greenhouse gases and pollutants. This change aligns with Ireland's target of reducing emissions from the transport sector by between 42% and 50% by 2030.

#### 3. Enhanced Quality of Life

Lower speed limits can improve the quality of life for residents living near rural roads. Reduced traffic noise and vibrations will create a more peaceful and pleasant environment. Additionally, safer roads encourage more walking and cycling, promoting healthier lifestyles and fostering a greater sense of community.

#### 4. Economic Advantages

Safer roads can lead to economic benefits as well. Fewer collisions mean lower costs related to emergency services, medical care, and vehicle repairs. Moreover, a safer and more attractive rural environment can boost local tourism and support small businesses.

#### 5. Specific concerns:

The table below lists locations where an 80 km/h speed limit is proposed. Further consideration is needed on whether this is an appropriate speed limit, and if so whether additional road markings and/or signage is required.

Location	Comments
SL-01-2024	1. An 80 km/h speed limit is indicated through the roundabout (at the entrance to Dundalk Science and Technology Park, etc.) on the Southern Link in Dundalk. Noting the expanding development in the area, such a speed limit is inappropriate on uncontrolled pedestrian crossings on multi-lane roads. The

<ul> <li>speed limit should change from 80 to 60 km/h west of the roundabout.</li> <li>2. There are some locations where an 80 km/h speed limit is inappropriate: <ul> <li>Bends at Newtownfane, Corbollis (note damage to bridge approach parapets<sup>1</sup>) and Mapastown townlands.</li> <li>Soraghan's Pub at Hanestown</li> <li>Narrow cutting at Gilbertstown townland, with no hard shoulders or verge.</li> <li>Unforgiving roadsides, e.g. telephone poles at Killincoole townland.</li> </ul> </li> </ul>
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We have provided a detailed list of comments in Appendix A, which we hope will be useful to identify gaps in the bye-laws and remove any inconsistencies.

Yours sincerely

Muireann O'Dea

Love 30 Campaign

## 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 a member group of the Irish Cycling Campaign (formerly Cyclist.ie), the Irish Cycling Advocacy Network.

<sup>&</sup>lt;sup>1</sup> See imagery from July 2023

https://www.google.com/maps/@53.8991664,-6.5007587,3a,75.7y,71.69h,71.26t/data=!3m7!1e1!3m5!1sKH\_5E3 k\_quH0ORJOj7AzSQ!2e0!6shttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fcb\_client%3 Dmaps\_sv.tactile%26w%3D900%26h%3D600%26pitch%3D18.74253293925939%26panoid%3DKH\_5E3k\_quH0ORJ Oj7AzSQ%26yaw%3D71.68964731725453!7i16384!8i8192?coh=205410&entry=ttu

# Appendix A

#### <u>General</u>

- 1. There are formatting issues throughout the document, which make it harder to read. These include:
  - a. There are multiple changes in font and font size, some of which might not be intended.
  - b. At various points in the document, there is a shift between a single blank line between paragraphs, to two blank lines. Additionally, some paragraphs have extra space before or after them, while others don't.
  - c. Indents, tabbing and alignment appears to be off in places, e.g. reference numbers are further right than some text.

	Original text	Comments
	COMHAIRLE CONTAE LÚ	
	LOUTH COUNTY COUNCIL	
	COUNTY OF LOUTH ROAD TRAFFIC DRAFT	2. Delete temporary text "DRAFT".
	SPECIAL SPEED LIMIT BYE LAWS 2024	3. Hyphenate "BYE-LAWS".
		4. Title should match exactly the title in Bye-law 1.
	COUNTY OF LOUTH ROAD TRAFFIC DRAFT	5. Delete temporary text "DRAFT".
	SPECIAL SPEED LIMIT BYE-LAWS 2024	6. Title should match exactly the title in Bye-law 1.
	Louth County Council, in exercise of the	7. No national road is affected by these bye-laws.
	powers conferred on it by Section 9 of the	Reference to TII is unnecessary. Consider deleting.
	Road Traffic Act, 2004 (No. 44 of 2004), as	8. Lower case "national roads"
	amended, and with the consent of	9. Lower case "special speed limit bye-laws".
	Transport Infrastructure Ireland (TII) in the	
	case of National Roads and having given	
	notice to the Commissioner of An Garda	
	Síochána, hereby make the following	
	Special Speed Limit Bye-Laws in respect of	
	the administrative area of Louth County	
	Council.	
1	These Bye-Laws may be cited as the	10. Lower case "bye-laws" (first instance).
	County of Louth, Road Traffic, Special	11. Title case "Bye-laws" (second instance).
	Speed Limit Bye-Laws 2024.	12. At least some level of consistency should be sought
		in naming such bye-laws. Bye-law 7 suggests there is
2	These bye-laws shall come into operation	no consistency. 13. It may be useful to include a provision such that the
	on the 22nd November, 2024.	Chief Executive can use a commencement order to
		designate a specific date, but to allow flexibility in
		the setting of that date, e.g. "These bye-laws will
		come into operation on such date or dates as are
		fixed by order of the Chief Executive of Louth County
		Council".
3	In these bye-laws:	
	"the Act of 1993" means the Roads Act,	14. Not meaningfully used in these bye-laws. Consider
	1993 (No. 14 of 1993);	deleting.

	Original text	Comments
	"the Act of 2004" means the Roads Traffic	15. Not used in these bye-laws. Consider deleting.
	Act, 2004 (No. 44 of 2004);	
	"the Act of 2024" means the Roads Traffic	16. Not used in these bye-laws. Consider deleting.
	Act, 2024 (No. 10 of 2024);	
	"built up area" means the area of a city, a	17. Not used in these bye-laws. Consider deleting.
	borough or a town within the meaning of	18. Lower case "built up areas".
	the Local Government Act 2001; In County	19. Delete "In County Louth the Built up Areas are
	Louth the Built up Areas are Dundalk,	Dundalk, Drogheda and Ardee;".
$\vdash$	Drogheda and Ardee;	
	"motorway" has the meaning assigned to	20. Not meaningfully used in these bye-laws. Consider
	it by the Act of 1993;	deleting.
	"national road" has the meaning assigned	21. Not meaningfully used in these bye-laws. Consider
$\vdash$	to it by the Act of 1993; "regional road" has the meaning assigned	deleting.
	to it by the Act of 1993;	22. Not used in these bye-laws. Consider deleting.
$\vdash$	"road" means a public road and includes a	
	motorway;	
	"drawing" means the drawings attached	23. Change semi-colon to full stop.
	hereto;	
4	The Special Speed Limits, made by these	24. This text is bloated. Consider something as simple as
	Bye-Laws, are indicated on the attached	"A special speed limit of eighty kilometres per hour
	drawing:	shall apply as indicated on the map in the Appendix."
		25. Lower case "special speed limits, made by these
		bye-laws".
$\square$	SL-01-2024	26. Check alignment.
	The default speed limit will apply in all	27. This will be the case anyway, making this text
	cases not regulated by these Road Traffic	irrelevant. Consider deleting.
	Special Speed Limit Bye-Laws 2024 or by	28. Should this paragraph be numbered? Numbering
	the other Speed Limit Bye-Laws in force as	would have knock-on effects, here and in the
	listed at 7 below.	Appendix.
$\vdash$	The applicable default aread limits are	29. Lower case "speed limit bye-laws".
	The applicable default speed limits are	30. The Road Traffic Act 2004 has been amended by acts other than the Road Traffic Act 2024. The acts can be
	specified in the Road Traffic Act 2004 as amended by the Road Traffic Act 2024	collectively cited as the "Road Traffic Acts 1961 to
	(subject to the commencement of the	$2024''^2$ .
	relevant section of the Act specifying the	31. This will be the case anyway, making this text
	revised default speed limit).	irrelevant. Consider deleting.
	On commencement, the default speed	32. Assuming the relevant provisions of the Road Traffic
	limit on Rural Local Roads will be 60km/h.	Act 2024 are commenced, this will be the case
		anyway, making this text irrelevant. There bye-laws
		can't come into force until those provisions are
		commenced (an 80 km/h speed limit can't be
		applied to a local road outside a built-up area.
		Consider deleting.

<sup>&</sup>lt;sup>2</sup> See <u>https://www.irishstatutebook.ie/eli/2024/act/10/section/1/enacted/en/html#sec1</u>

	Original text	Comments
	The Special Speed Limits, as prescribed by these Bye-Laws, are indicated as follows: Legend 30km/h 40km/h 50km/h 60km/h 80km/h 100km/h 120km/h	<ul> <li>33. Lower case "special speed limits, made by these bye-laws".</li> <li>34. Most of the text is tabbed and stays in Line. The text "50km/h zone" has a series of space characters in front of it and isn't quite in line with the rest of the text.</li> </ul>
5	50km/h zone Ambulances, Fire Brigade vehicles and Garda Siochana vehicles, while being used in the course of duty, are exempt from all special speed limits prescribed by these Bye-Laws.	<ul> <li>35. Spelling "Síochána".</li> <li>36. Lower case "bye-laws".</li> <li>37. This provision is problematic. 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<sup>3</sup>). Section 87 applies whether it is mentioned in the bye-laws or not. Moreover, the provision could be open to abuse.</li> </ul>
6	Appendix I includes drawings where permanent special speed limits are prescribed.	38. Delete "permanent".

<sup>&</sup>lt;sup>3</sup> See <u>https://www.irishstatutebook.ie/eli/2014/act/3/section/23/enacted/en/html</u>

	Original text	Comments
	SL-01-2024	<ul> <li>39. An 80 km/h speed limit is indicated through the roundabout (at the entrance to Dundalk Science and Technology Park, etc.) on the Southern Link in Dundalk. Noting the expanding development in the area, such a speed limit is inappropriate on uncontrolled pedestrian crossings on multi-lane roads. Having the change from 80 to 60 km/h west of the roundabout might make sense.</li> <li>40. There are some locations where an 80 km/h speed limit is less appropriate:</li> <li>Bends at Newtownfane, Corbollis (note damage to bridge approach parapets<sup>4</sup>) and Mapastown townlands.</li> <li>Narrow cutting at Gilbertstown townland, with no hard shoulders or verge.</li> <li>Unforgiving roadsides, e.g. telephone poles at Killincoole townland.</li> </ul>
7	The following Bye-Law shall remain in	41. Lower case, plural "bye-laws".
	force:	42. Put list in date order.
•	Louth County Council, Road Traffic Speed Limits, County of Louth Bye-Laws 2018.	<ul><li>43. Is this the exact title?</li><li>44. At least some level of consistency should be sought in naming such bye-laws.</li></ul>
•	Louth County Council, County of Louth, Housing Estates Special Speed Limit Bye-Laws, 2022.	<ul><li>45. Is this the exact title?</li><li>46. At least some level of consistency should be sought in naming such bye-laws.</li></ul>
•	Louth County Council, County of Louth, Special Periodic Speed Limits Bye Laws 2021	<ul> <li>47. Is this the exact title?</li> <li>48. At least some level of consistency should be sought in naming such bye-laws.</li> <li>49. Full stop.</li> </ul>
	Made and adopted under the Common Seal of the Council of the County of Louth this	
	Day of October, 2024	50. Insert date. 51. Check alignment.
	Present when the Common Seal of the Council of the County of Louth was affixed hereto:	
	CATHAOIRLEACH	52. Check spacing.

<sup>&</sup>lt;sup>4</sup> See imagery from July 2023

https://www.google.com/maps/@53.8991664,-6.5007587,3a,75.7y,71.69h,71.26t/data=!3m7!1e1!3m5!1sKH\_5E3 k\_quH0ORJOj7AzSQ!2e0!6shttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fcb\_client%3 Dmaps\_sv.tactile%26w%3D900%26h%3D600%26pitch%3D18.74253293925939%26panoid%3DKH\_5E3k\_quH0ORJ Oj7AzSQ%26yaw%3D71.68964731725453!7i16384!8i8192?coh=205410&entry=ttu

Original text	Comments
DIRECTOR OF SERVICES	53. Check spacing.
Appendix I	
Road(s) in respect of which permanent special speed limits are prescribed:	
	54. There appears to be a blank table on the page after
	the Appendix cover page.