



# AN MHEITHEAL ROTHAR

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GALWAY'S COMMUNITY BIKE WORKSHOP

## An Mheitheal Rothar Public Consultation Submission on: Galway City Speed Limit Proposals

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To: Galway City Speed Limit Consultation

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A chairde

An Mheitheal Rothar is a community bike workshop run as a not-for-profit cooperative. As well as advocating for access to cycling in Galway City, we operate ReCycle Your Cycle, an award winning bike recycling initiative which takes bikes sent for scrap to the Galway City Council Civic Amenity Centre and repairs them for sale, while training long term unemployed people in valuable cycle mechanic skills via the Tús and CE schemes. We also teach people to fix their own bikes with the help of volunteer mechanics at our DIY workshops.

Galway City Council has announced new speed limit zones within Galway City, including an inner zone of 30km per hour limits. While we believe any lowering of speed limits is beneficial to active transport in terms of actual and perceived safety for cycling and walking, there are serious concerns with the package of measures as proposed.

## **1. Speed limits and enforcement**

Cyclists are far more likely than other road users to suffer injury and death. A comparison of police and hospital accident data showed the cyclists are 8 times more likely than vehicular road users to die in a collision and 40 times more likely to be injured or killed in a collision.<sup>1</sup>

Apart from the central 30km per hour zone, all proposed speed limit changes are increases in speed limits. As a general principle, this is not good for the safety of cyclists and pedestrians. The facts about accidents are well accepted: a vehicle impact at 50km per hour means a cyclist has a 50% chance of survival, while the same impact at 60 km per hour means a 10% chance of survival.<sup>2</sup>

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<http://www.tara.tcd.ie/bitstream/handle/2262/73799/JTRP-D-13-00319R1-6.pdf?sequence=1#:~:text=Like%20many%20other%20countries%2C%20Ireland,on%20the%20amount%20of%20cycling.&text=Based%20on%20this%20estimate%20and,per%20100%20million%20km%20cycled.,> p 12

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[https://ec.europa.eu/transport/road\\_safety/specialist/knowledge/speed/speed\\_is\\_a\\_central\\_issue\\_in\\_road\\_safety/speed\\_and\\_the\\_injury\\_risk\\_for\\_different\\_speed\\_levels\\_en](https://ec.europa.eu/transport/road_safety/specialist/knowledge/speed/speed_is_a_central_issue_in_road_safety/speed_and_the_injury_risk_for_different_speed_levels_en) ,  
[https://www.who.int/violence\\_injury\\_prevention/publications/road\\_traffic/world\\_report/speed\\_en.pdf?ua=1](https://www.who.int/violence_injury_prevention/publications/road_traffic/world_report/speed_en.pdf?ua=1)

In addition, there is a strong body of evidence that vehicular speed limits of 30-40 km per hour result in significantly lower risk to cyclists of fatal or severe accidents than speed limits of 50-60km per hour.<sup>3</sup>

These proposals include an increase to 60km per hour on Browne Roundabout and the stretch of the N6 from Quincentennial Bridge to Browne Roundabout. Increasing speed on the Browne Roundabout, which is already very dangerous for pedestrians and cyclists trying to move between Westside, Newcastle and UHG/the University, is not a good idea. Enforcing the existing speed limit would be safer. Given the ongoing traffic gridlock in the area, higher speed limits would do little to decrease commuter travel durations at peak travel times or the driver confusion created by stretches of road with multiple changes of speed limit.

We note that in many places in Galway City, existing speed limits are not enforced. This includes Quincentennial Bridge and the N6 from Tuam Road to the Menlo Park Hotel. Speed limits that are not enforced tend not to be observed.

The changes specified in the 2009 Galway City Special Speed limit Bye Laws were never put into effect in terms of signage. There are many sections of road in the city with speed limits of either 60 or 80 km/h posted on signs that should actually read 50km/h. All of the

**Recommendation 1.1: Retain and enforce existing 50km per hour limit around Browne Roundabout and the N6 from Quincentennial Bridge.**

**Recommendation 1.2: Retain and enforce existing speed limit on Quincentennial Bridge and the N6 from Tuam Road to the Menlo Park Hotel.**

## **2. Safe routes to work**

It is proposed to increase speed limits along the Bothar na dTreabh (N6) to Parkmore to 80 km per hour. This is a major route used by cyclists travelling from big population centres in the suburban west of the city (Knocknacarra, Newcastle etc), and the inner east of the city (Terryland, Tirellan Heights etc) to get to major employers such as Medtronic and Boston Scientific further east.

Although there is a cycling route along this road, the effect of raising speeds will be negative on both actual and perceived safety unless the cycleway is adequately separated from the road. The

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<sup>3</sup> <https://www.tandfonline.com/doi/abs/10.1080/15389588.2019.1680836> ,  
<https://www.sciencedirect.com/science/article/abs/pii/S000145750600128X>

same is true of walkways for pedestrians. If this does not happen, the end result will be to reduce already low numbers of people cycling or walking to work at Galway's major employers, increasing car traffic, putting further strain on carparks at those employers.

**Recommendation 2.1: Create cycleways and walkways designed ensure segregation from traffic on N6/Bothar na dTreabh to and from Parkmore.**

### **3. Proposed speed limits not realistic due to road type**

Several of the roads proposed for an 80km per hour limit are simply not up to the job of facilitating these speeds. These include Clybaun Road, Letteragh Road, and Cappagh Road. Given that many parts of these roads lack footpaths and have many direct housing entrances and driveways, this is potentially dangerous.

Given the very narrow parts of these roads, it seems doubtful that vehicles can even achieve a speed of 80km for large stretches. While the speed limit is not realistic, that does not mean drivers of vehicles will necessarily act sensibly and moderate their own speed to reflect the conditions. It would be much better for speed limits to reflect what is safe and sensible than what is at best an aspirational speed.

**Recommendation 3.1: Retain and enforce existing speed limit on Clybuan Road, Letteragh Road and Cappagh Road.**

### **4. Safe routes to school**

Under the proposals, Mary's Road will have a new increased speed limit of 50km per hour. This ignores the fact that Mary's Road is home to St Mary's College, which currently has 362 students but is about to amalgamate with Presentation School and will then have capacity for up to 1000 students. Mary's Road is also home to Scoil Fhursa, a national school with 260 pupils, and an arterial route for children travelling to school at Scoil Bhíde in Shantalla and to the Collaiste Iognaid/The Jes from Salthill and Knocknacarra. Although the Jes school is within the proposed 30km hour zone, very few of the pupils would live within the zone, meaning they would have to navigate a potentially dangerous crossing of the boundary roads into the zone.

Irish children are suffering from high rates of overweight and obesity, with 15% of 5 year old overweight and five per cent obese.<sup>4</sup> Perceived lack of safety among parents and children is a key driver of low cycling rates among children<sup>5</sup> and research using “mental maps” has shown that perceptions of safety impact decisions to cycle in Galway City specifically<sup>6</sup>. Speed limits of 50km per hour mean that if any of those students brave enough to cycle to school are hit, the likelihood of death or serious injury is much increased, especially in children under 10 years<sup>7</sup>. All these factors mean that 50km limits along Mary’s Road are not ideal for our children.

At a time when rates of children and teenagers, especially girls, walking and cycling to school are in chronic decline<sup>8</sup>, this undermines efforts to increase active travel to school. Any changes to any transport infrastructure in Galway must prioritise safe routes to school. Other local authorities, such as Dublin City Council, are explicitly putting safety at the heart of their designs for routes to school<sup>9</sup>. It is disappointing that Galway City Council are not doing the same.

**Recommendation 4.1: Safe routes to school be prioritised in all changes proposed to transport within Galway City.**

**Recommendation 4.2: Speed limits of 30km per hour be implemented on Mary’s Road to reflect the number of school students who use this road to travel to the various schools it serves.**

## 5. Data collection

In the process of coming up with some of the proposed new speed limits, surveys of traffic were undertaken by Tobin consultants in accordance with the *Guidelines for Setting and Management Speed Limits (2015)*<sup>10</sup>. The methodology included driving through the areas of proposed changes, and taking account of the “presence of cycling/walking infrastructure” and “level of use by pedestrians/cyclists” but there was no process for determining what the effect of reducing or increasing speed might be on numbers of active travel participants.

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<sup>4</sup> <https://www.growingup.ie/pubs/OPEA110.pdf>, Figure 8. The GUI study was carried out by a consortium of researchers led by the Economic and Social Research Institute (ESRI) and Trinity College Dublin (TCD) and is based on interviews with more than 9,000 families conducted when the children were nine months, three years and five years old.

<sup>5</sup> <https://jech.bmj.com/content/62/10/852.short>

<sup>6</sup> <https://pubmed.ncbi.nlm.nih.gov/26760689/>

<sup>7</sup> <https://www.sciencedirect.com/science/article/pii/S0022437514000437>

<sup>8</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-cp6ci/p6cii/p6stp/>

<sup>9</sup>

<http://www.dublincity.ie/sites/default/files/content/RoadsandTraffic/RoadSafety/Documents/SRST%20Walking%20Bus%20Guide%20Full%2007.pdf>

<sup>10</sup> <http://dtas.old.gov.ie/roads/publications/english/guidelines-setting-and-managing-speed-limits-ireland>

The *Project Appraisal Guidelines for National Roads Unit 13.0 - Pedestrian and Cyclist Facilities PE-PAG-02036 October 2016* recommends calculating health benefits of new road infrastructure “using the forecasts of the numbers of new pedestrians and cyclists (people who would not otherwise have walked or cycled in the absence of the scheme) and the kilometres or minutes or activity involved.”<sup>11</sup> It also recommends basing actions not simply on existing numbers of walkers and cyclists but on projected numbers of new walkers and cyclists.<sup>12</sup> These recommendations do not appear to have been followed in this process.

There has been no effort to gauge how actual and potential cyclists and pedestrians feel about the infrastructure. As stated above, research has shown that perception of safety is a key part of the decision to cycle. “Mental mapping” of perceived danger in Galway City against statistical data on collisions and injuries has demonstrated that the perceived danger of specific places such as roundabouts correlates with hard data, and both affect the decision to cycle. Tools like “mental mapping” can help determine the best infrastructure changes to make.<sup>13</sup>

**Recommendation 5.1: Determine the potential health benefits of changes to infrastructure using the methodology laid out in the *Project Appraisal Guidelines for National Roads Unit 13.0 - Pedestrian and Cyclist Facilities PE-PAG-02036 October 2016*.**

**Recommendation 5.2: Use consultation tools like “mental mapping” to get a picture of factors that affect perceived as well as actual safety.**

## 6. Consultation process

We are aware of observers being refused access to attend the Transport SPC meetings over Zoom. The right for community members to observe SPC meetings is an important part of community consultation and oversight, so we feel it is important that this right is preserved despite the Covid 19 crisis.

In addition, the maps provided for consultation purposes are poor quality - for example at first glance the map seems to indicate that Mary's Road would be part of the 30km per hour zone and it is only on close inspection that it becomes obvious that it is excluded. This makes it hard to compare current and proposed speed limits.

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<sup>11</sup> <https://www.tiipublications.ie/library/PE-PAG-02036-01.pdf>, p 6

<sup>12</sup> <https://www.tiipublications.ie/library/PE-PAG-02036-01.pdf>, p 15

<sup>13</sup> <https://pubmed.ncbi.nlm.nih.gov/26760689/>

## 7. Best practice examples

**Shared space.** The psychological effect of ambiguous, shared space is well documented: ““Eye contact and human interaction are more effective means to achieve and maintain attractive and safe areas than signs and rules”<sup>14</sup>. In the Netherlands and Belgium, a street with traffic calming measures like bollards and low speed limits is known as a *woonerf*, or “living street”<sup>15</sup>. The design of shared space was pioneered by Hans Monderman and relies on removing elements to create flexible, safe traffic flow with a high degree of caution exercised by all users<sup>16</sup>, with many *woonerven* now incorporating these shared space principles.

In the example below, by changing the surface and putting in the two planters (with reduced speed limit) cars must proceed cautiously. Cyclists can go as they please and cars will slow down as (i) it doesn't “feel” like a road and (ii) the strategically placed planters will stop them going too fast. Also the interventions look more attractive than traditional traffic calming measures like bollards, speed bumps and concrete.



<sup>14</sup> <https://en.wikipedia.org/wiki/Woonerf>

<sup>15</sup> <https://en.wikipedia.org/wiki/Woonerf>

<sup>16</sup> <https://cyclingsolutions.info/shared-space/>

Above: Planned meandering road style where shared space encourages slow traffic, walking and cycling.<sup>17</sup>



Above: Cyclists side by side on a Dutch “living street” or *woonerf*.<sup>18</sup>

**Design.** The Dutch CROW design manual<sup>19</sup> contains expertise based on decades of designing, building and maintaining best practice cycle infrastructure in the Netherlands. The principles used in this publication should underpin all urban transport infrastructure design in Galway. It is available for download for €90 from the Design Manual for Bicycle Traffic website.

**Recommendation 7.1: Use the best practice principles of shared space and cycle infrastructure creation and maintenance in the Dutch CROW manual when designing all traffic related interventions in Galway City.**

Thank you for the opportunity to provide our input to this consultation process.

<sup>17</sup> Source: <http://www.aviewfromthecyclepath.com/2016/08/speed-bumps-are-not-effective-traffic.html>

<sup>18</sup> Source: <http://www.aviewfromthecyclepath.com/2016/08/speed-bumps-are-not-effective-traffic.html>

<sup>19</sup> <https://www.crow.nl/publicaties/design-manual-for-bicycle-traffic>