

Item No. 3

Report to the Chairperson and Members of the Transportation Strategic Policy Committee

Report on the Public Consultation on proposed Dublin City Council Special Speed Limit Bye-Laws 2016

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November 2016**

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1.0 Executive Summary

The Department of Transport Tourism and Sport issued the Guidelines for Setting and Managing Speed Limits in Ireland in March 2015 (hereafter referred to the 'Guidelines'). Dublin City Council's Environment & Transportation Department is progressing this review in accordance with these Guidelines.

The Road Traffic Act of 2004 (Section 9) sets out the current legislative basis for the setting of speed limits. The setting of special speed limits is a function of the Elected Members of the council. The current speed limits were last reviewed and updated in 2011. The default speed limit in Dublin City is 50km/hr with a selection of areas, roads and streets where a special speed limit of 30, 60 or 80km/hr is also in place.

The most recent revision of Special Speed Limits Bye-Law (2013) is available at www.dublincity.ie ('Speed Limits in Your Area'). Recently, the Transportation Department of Dublin City Council concluded our Public Consultation on the proposed Special Speed Limit Bye-Laws 2016.

This Public Consultation has two purposes:

- Seek public comment for the introduction of the proposed Special Speed Limits Bye-Laws 2016, which include additional 30km/hr zones in the Dublin City Council administrative area.
- Seek public feedback in relation to identifying additional areas for the introduction of additional Special Speed Limits for a subsequent Public Consultation in 2017.

The proposed Public Consultation documentation was presented to both the Strategic Policy Committee for Transportation and the full Dublin City Council at their meetings on 25th May and 13th June 2016, respectively. Approval to proceed to Public Consultation was received from the Elected Representatives at that time.

This report has considered the 550 submissions which were received as part of the public consultation process. The comments received, and the Transportation's clarifications and replies, have been addressed in detail in Section 5.0. One particular item to highlight was that a number of the submissions expressed a view that the widespread application of 30km/h to all roads is not practicable (i.e. should not be applied to main traffic corridors/arterial routes). Therefore approximately 96 submissions contained the misunderstanding that the proposal is for a city wide 'blanket 30km/h zone' on all roads and streets. Please see Table 4.0, Item 3 (page 12) for a detailed reply and clarification that the current default speed limit of 50km/h on main routes into and around the city are to be retained as part of this proposal.

The Public Consultation process identified two amendments which are considered acceptable to being included in the proposed Bye-Laws, namely:

- a. Retain **City Quay** (Dublin 2) at 50km/h as opposed to the proposed 30km/h, and;
- b. **Inchicore Road** (Dublin 8) is to have a 30km/h speed limit put in place, adjacent to the Kilmainham Gaol where the recent public realm work has been completed, (from the junction with the South Circular Road to the junction with Memorial Road).

Also the proposed implementation dates for Phase 1 & Phase 2 have been revised to reflect a feasible implementation date of March 31st and May 31st 2017, respectively.

The proposed Special Speed Limit Bye-Laws 2016 have now been revised to reflect the above amendments. The Transportation Department of Dublin City Council recommends to the Strategic Policy Committee for Transportation that the proposed Special Speed Limit Bye-Laws 2016 be submitted to the full Council for their adoption.

2.0 Public Consultation Details

The Public Consultation on the draft Special Speed Limit Be-Laws 2016 was carried out from the **13th July to the 24th August 2016 inclusive.**

The Public Consultation was a statutory process carried out in accordance with the stipulations set out by the Department of Transport, Tourism and Sport. The statutory requirements of this public consultation which we complied with were set out in the document 'Guidelines to Setting & Managing Speed Limits in Ireland':

<p>PUBLIC CONSULTATION</p> <ul style="list-style-type: none">• Newspaper Notice published in TWO daily newspapers• Display bye-laws at Local Authority Offices• Display on Local Authority Website• Display on www.speedlimits.ie website• Objections received in writing during the 30 day period commencing on the date of first publication of the notice	<p>Statutory – section 9.4</p>
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The public notice opposite was published on both the Irish Times and Irish Star on the 13th and 14th July 2016.

The proposed draft Special Speed Limit Bye-Laws were on display in the Dublin City Council offices as listed on the public notice.

Public consultation documents and information were put on the website www.dublincity.ie/speedreview, where they are still accessible for information, (see Appendix A). Submissions were also accepted at this online location.



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council



HELP US MAKE DUBLIN'S ROADS SAFER FOR ALL

We're looking for your views on our proposed Special Speed Limit Bye-Laws 2016

Dublin City Council is reviewing the speed limits in its administrative area, under Section 9 of the Road Traffic Act 2004, and we would love your feedback on our proposed Special Speed Limit Bye-Laws 2016.

THE PROPOSALS INCLUDE THE EXPANSION OF THE 30KM/HR SPEED LIMIT ZONES IN CERTAIN RESIDENTIAL AREAS IN THE CITY.

This Public Consultation invites you to comment on the proposed adoption of these Bye-Laws. We are also looking for feedback in relation to identifying possible additional roads and streets for the next phases.

Proposals can be inspected from **Wednesday, 13th July, 2016 to Wednesday, 24th August, 2016 during normal public office hours** at:

- Public Counter at Dublin City Council, Civic Offices, Wood Quay, Dublin 8.
- Dublin City Public Libraries
- Dublin City Council Area Offices
- Or on our website at www.dublincity.ie/speedreview which includes graphics, stats and interesting facts and FAQ's.

Dublin City Council would really appreciate your views on these proposals as your comments are vital to us. Submissions may be made in writing to: **The Executive Manager, Dublin City Council, Environment and Transportation Department, Block 2, Floor 6, Civic Offices Wood Quay, Dublin 8**, or by email to speedreview@dublincity.ie, by **17.00hrs on Wednesday, 24th August, 2016.**

dublincity.ie

DC2276
Irish Times 14x2 (83)
Irish Star 14x2 (74)

The public consultation was advertised on www.speedlimits.ie website, with links to our Dublin City Council website and submission options provided also.

The submissions received during the duration of the Public Consultation will be reported on in full in Section 5 of this report.

Please note; a period of 30 days was required for the public consultation, however due to the public consultation falling within the summer months, we decided to provide an extended duration of 6 weeks.

3.0 Publicity & Advertising of the Public Consultation

3.1 Pre-Draft Consultation

As part of our Pre-Draft Consultation process, the Transportation Department consulted with prescribed stakeholders between the 7th September 2015 and the 2nd October 2015. On the 7th September 2015 invitations to contribute to the development to the draft Special Speed Limit Bye-Laws 2016 were circulated to Transport Infrastructure Ireland, An Garda Síochána, members of the Transportation Strategic Policy Committee, Dun Laoghaire Rathdown County Council, South Dublin County Council and Fingal County Council.

Four submissions in total were received. These are summarised on Table 1;

Stakeholder	Brief summation of content
The AA, (Submitted via the Department of Transport, Tourism & Sport).	Recommended a revised speed limit on 8 Dublin City roads at various locations across the city, along with their rationale for the changes. The DTTaS requested specific consideration is given to this submission (Addressed in full under Item 4.0).
Dublin Cycling Campaign, (SPC Member).	Expressed support and stated their preference for a default 30km/hr speed limit in all urban areas. Support for 30km/hr was demonstrated through both national and international policies and guidelines.
Transport Infrastructure Ireland.	Outlined their jurisdiction and responsibility, and also clarifications in relation to national roads.
Dun Laoghaire - Rathdown County Council.	Expressed support of proposed actions to improve safer roads and highlighted the need for a working relationship with Dublin City Council in relation to roads and streets across our shared boundary.

Table 1: Pre-Draft Consultation submissions

3.2 Dublin City Council's website

The Dublin City Council website was the principle publication of the proposed Special Speed Limit Bye-Laws 2016. The webpage clearly set out the following information for the public:

- An introduction to the public consultation including a overview of its purpose
- Explanatory note for the proposal
- A map of the existing Dublin City Council Speed Limits

- The proposed DCC Special Speed Limit Bye-Laws 2016
- A map of the proposed Dublin City Council Speed Limits 2016
- A 'Frequently Asked Questions' section (with 15 no. questions and answers).
- Links to thirteen various websites and documents directly related to speed limits in urban areas.

Website address: www.dublincity.ie/speedreview (Appendix A).

3.3 Public Consultation Awareness

As Outlined in section 2.0, the Public Consultation was advertised as required under the statutory process. To promote further awareness of the public consultation and the proposed Special Speed Limit Bye-Laws 2016, the following are some of the noted media outlets which publicised the proposed bye-laws and facilitated public awareness, (this not an exhaustive list):

<u>Print Media:</u>	The Business Post; The Herald; Independent; Irish Examiner; Irish Mail on Sunday; Irish Times.
<u>Online media:</u>	Boards.ie; CitizensInformation.ie; DublinLive.ie; Irishcycle.ie; Irishhealth.ie; the Journal.ie; Reddit.ie; RTE.ie.
<u>Radio:</u>	98fm; DublinCityFM; Newstalk, RTE Radio 1.
<u>Social media:</u>	Dublin City Council Twitter feed.
<u>Jake's Legacy:</u>	Roseann Brennan of the Jake's Legacy campaign lent support to the launch of the Public Consultation, through attendance at its launch in Civic Offices on the 13 th of July and partaking in interviews on the day (both print & television media).

4.0 Submissions from the AA and Engineers assessments.

The Department of Transport Tourism & Sport issued Dublin City Council with a specific instruction in Circular RSD02-2015 (Dated: 1st July 2015). The Department wrote in reference to correspondence from the AA that “this Department is now requesting that arrangements are made in your Local Authority to ensure that due regard is given to roads, or sections of road, on this list”. The AA made recommendations for a revised speed limit on 8 roads or streets within the Dublin City Council area, namely;

Location	Road Name	Current Speed limit	Recommended Speed Limit from The AA	Rationale presented by the AA for their recommendation
1	Fairview Strand	50kmh	80kmh	6 lanes and not being utilised efficiently - badly signposted - 6 people agreed with this comment.
2	Dublin City City, North & South Quays and Dawson Street	30kmh	60kmh	Ridiculous for a city centre commuter route - adding to congestion - cyclists passing out cars - senseless, bring in law for cyclists to wear high viz jackets and helmets - unnatural to do 17mph in a modern car. Infuriating and a money making scheme. 125 people agreed with this comment.
3	Mourne Road, Drimnagh	50kmh	70kmh	Regularly broken in rush hour which means it is not being put into effect and is pointless.
4	Ballymun Road R108	50kmh	80kmh	DCW - Should be a lot higher, like shooting fish in a barrel. - 11 people agreed with this comment.
5	Cork Street	50kmh	60kmh	Very wide road and very easy to go over this limit without noticing - 2 people agreed with this comment.
6	Claremont Lawns, Glasnevin	50kmh	30kmh	A dangerous residential Cul de Sac.
7	Auburn Avenue, Castleknock	50kmh	70kmh	Not necessary as it's a stretch that's wide and long and has traffic lights, a money making exercise on behalf of the Gardai - 3 people agreed with this comment
8	Conyngham Rd	50kmh	80kmh	Far too low with no reasoning - 4 people agreed with this comment.

Each of these locations was individually assessed by Dublin City Council Engineers to determine the acceptability of the AA's recommendations. Assessment summary per location is set out on Table 3:

Table 3: Engineering Assessment of the submission made by The AA

Location	Road Name	Summation of Engineers assessment	DCC Engineers recommendation
1	Fairview Strand	<ul style="list-style-type: none"> • Current Speed Limit: Default Speed Limit of 50km/h • Total carriageway width is 6.5 meters at the narrower sections. • Road length between Philipsburgh Avenue & Annesley Bridge Road Junctions is approximately 210m. • Road is angled in the middle, i.e. not a straight road for sight lines. • Properties affronting Fairview Strand include; Residential and commercial. 	<p>80km/h speed limit is not recommended.</p> <p>Retain current speed limit, Only consider a downward review of speed limit.</p> <p>(Road is residential/ commercial and amenity destination).</p>
2	Dublin City City, North & South Quays and Dawson Street	<ul style="list-style-type: none"> • Dublin City Centre, including sections of the Quays and including Dawson Street are subject to the Special Speed Limit of 30km/h and 50km/h at various locations since 2011. • Average traffic speeds do vary depending on the time of day. Generally speaking the quay roads accommodate heavy volumes of all modes of transport, particularly vulnerable road users 	<p>60km/h speed limit is not recommended.</p> <p>Retain current speed limits of 30km/h and 50km/h as are in place. Review the engineering design to be conducive to driver behaviour along areas of the Quays where at certain times average traffic speeds are in excess of the speed limit. Introduction of a 60km/h speed limit in the city centre should not be considered further at this time.</p>
3	Mourne Road, Drimnagh	<ul style="list-style-type: none"> • Mourne Road is predominantly a residential street with minimal commercial property and a school affronting the road. • Excluding parking the carriageway is approx. 6.5m in width. • The road is relatively straight for the most part. • Traffic calming (speed ramps) is installed along its length. • The road surface is predominantly reinforced concrete slab. 	<p>70km/h speed limit is not recommended.</p> <p>This residential road is unsuitable for traffic travelling at 70km/h. The road is characteristic of a road which should suit a 30km/h speed limit as proposed in our bye-laws and as described in the Guidelines for Setting and Managing Speed Limits in Ireland.</p>

4	Ballymun Road R108	<ul style="list-style-type: none"> ● Ballymun road is an arterial road to the north of Dublin City approximately 2.4km in length in DCC from Griffith Avenue to Santry Avenue. ● The road is typically two general traffic lanes in each direction (North & south) also with mandatory cycle lanes and a bus corridor. ● The urban default speed limit of 50km/h is applied along its length. ● The northern half of the road has traffic calming measures in place. ● The properties affronting the road are residential, amenity, third level, and commercial. 	<p>80km/h speed limit is not recommended.</p> <p>Various traffic calming measures are in situ on this road, as requested by the public to slow traffic speeds. Also this road travels through a significant civic centre. Retain the roads speed limit at the national urban speed limit recommendation of 50km/h.</p>
5	Cork Street	<ul style="list-style-type: none"> ● Cork Street is an arterial road to the south west of Dublin City approximately 750m in length. ● The road is typically two general traffic lanes in each direction (North & south) also with mandatory cycle lanes and a bus corridor. ● The urban default speed limit of 50km/h is applied along its length. ● The road is adjoined by St Luke's Avenue and Dolphins Barn Street, both with a default 50km/h speed limit. ● The properties affronting the road are residential, amenity, public offices (&hospital) and commercial. 	<p>60km/h speed limit is not recommended.</p> <p>This is strategic arterial road situated within the city centre area in an urban environment. A significant number of junctions and commercial premises attracting large volumes of local pedestrian and cyclist movements as well as substantial commuter through traffic. Recommendation is to retain the roads speed limit at the national urban speed limit recommendation of 50km/h. Review with consideration for a 40km/h speed limit in the future.</p>
6	Claremont Lawns, Glasnevin	<ul style="list-style-type: none"> ● A cul de sac in Glasnevin. ● Residential area, with a significant park amenity adjacent to sections of the road. 	<p>Recommended.</p> <p>A 30km/h speed limit is recommended to be included as part of a Phase 3 public consultations.</p>

7	Auburn Avenue, Castleknock	<ul style="list-style-type: none"> • Auburn Road is a key distributor road, approximately 1 km in length. • It substantially comprises of one northbound and one southbound lane. Access roads along Auburn Road lead to substantial residential areas with high volumes of traffic accessing Auburn Road accordingly. 	<p>70km/h speed limit is not recommended.</p> <p>Road is unsuitable for traffic travelling at 70km/h. The road is characteristic of a road which is conducive to a 50km/h speed limit as described in the Guidelines for Setting and Managing Speed Limits in Ireland.</p>
8	Conyngham Rd	<ul style="list-style-type: none"> • Conyngham Road is a strategic arterial road to the west of the city centre. It approximately 1 km in length. Various access roads adjoin Conyngham Road, including residential, amenity and commercial premises. 	<p>80km/h speed limit is not recommended.</p> <p>Road is unsuitable for traffic travelling at 80km/h. this road has a high number of different traffic movements as opposed to the existing 60km/h speed limit on Chapelizod Road. The road is characteristic of a road which is conducive to the default 50km/h speed limit as described in the Guidelines for Setting and Managing Speed Limits in Ireland.</p>

5.0 Submissions from the Public Consultation

Four separate sources presented submissions from the public, namely:

Emails were received at speedreview@dublincity.ie.

Comments were received through the online survey at www.dublincity.ie/speedreview.

- 157** Email submissions were received
- 376** Comments received through our website

Letters were received by the Executive Manager at the Environment & Transportation.

- 12** Letters were received
- 5** Area Committee Questions or Motions were received

The **550 submissions** received were categorised into a range of comments which members of the public (and organisations) wished to put forward for consideration. The submissions were segmented into ten distinct categories of comment as outlined on Table 4.0.

The 550 submission conveyed the following general comments

Item	Comment	No.
1.	<p>Submission was generally supportive of expanding the 30km/h speed limit as per proposal, (no specific additional comment).</p> <p><i>Response:</i> <i>Noted.</i></p>	55
2.	<p>Support for expanding 30km/h speed limits expressed. This was accompanied with additional roads and streets suggested for future considerations for both 30km/h and 40km/h speed limit areas.</p> <p><i>Response:</i> <i>Noted. Suggested roads and streets have been retained for consideration as part of a Phase 3 review of special speed limit bye laws.</i></p>	45
3.	<p>Expressed a view that widespread application of 30km/h to all roads is not practicable (i.e. should not be applied to main traffic corridors/arterial routes). Therefore some of the submissions in this segmentation contained the misunderstanding that the proposal is for a city wide blanket 30km/h zone on all roads and streets.</p> <p><i>Response:</i> <i>As part of the proposed Special Speed Limit Bye-Laws 2016, it is proposed to expand the 30km/h special speed limits on predominantly residential streets (or in the proximity of schools). Residential streets are identified as roads and streets whose function is intended to provide local vehicular access and egress between places of residence and the arterial or link roads nearby.</i></p> <p><i>This proposal is not to introduce a blanket 30km/h speed limit. It is proposed to retain the existing 50km/h default speed limit on all arterial and link routes across the city. This will not affect the speed or commuting times of traffic travelling into or out of the city on a daily basis. Preferably such vehicles should not be travelling across residential areas where the 30km/h speed limit is being proposed.</i></p>	96
4.	<p>Reducing speed limits on its own is not sufficient, additional initiatives such as road user education and engineering of roads must also accompany any speed limit changes. This includes educational actions toward all road users, not just motorists.</p> <p><i>Response:</i></p>	

	<i>The Transportation Department agrees with this comment. Dublin City Council (DCC) has recently published its Road Safety Strategy 2020. This includes a number of initiatives and actions to promote road safety in Dublin City. This Road</i>	
4.	<p><i>Safety Strategy sets out a number of actions under the three pillars of Education, Engineering and Enforcement, each which is designed to complement the successful introduction of the proposed Special Speed Limit Bye-Laws 2016.</i></p> <p><i>In particular Dublin City Council's Transportation Department is working with the Road Safety Authority (RSA) to further promote the educational element of road safety awareness for all road users (not just motorists). The RSA is a member of the Working Together Group which oversees the implementation of the Road Safety Strategy 2020 and evaluates its performance.</i></p> <p><i>In addition to this, the Road Safety Strategy 2020 sets out a list of engineering actions also, with the target of achieving safer roads within the Dublin City Council area. These improvements are being progressed successfully in DCC's annual works scheme.</i></p>	100
5.	<p>Expressed concern that the current speed limits are largely ignored and enforcement of existing speed limits is requirement to deliver safer roads.</p> <p><i>Response:</i></p> <p><i>The primary responsibility for enforcement of road traffic legislation rests with An Garda Síochána. In particular, continuous high visibility enforcement will continue to focus on speed limit compliance. Speed limit compliance has been highlighted as a key enforcement action within the Road Safety Plan 2020.</i></p> <p><i>As a local authority, working with An Garda Síochána, Dublin City Council will continue to target resources and engineering interventions at locations where traffic speeds are identified to be in excess of the limits in place. We expect that that engineering interventions will be required to complement the successful introduction of a reduced speed limit and as such this action is included in our Road Safety Strategy 2020 as part of our annual capital investment programme.</i></p>	83
6.	<p>Slower speeds will increase pollution and congestion on the city streets with negative environmental and economic consequences.</p> <p><i>Response:</i></p> <p><u><i>Environmental concerns</i></u> <i>Generally speaking the slower a vehicle travels the less fuel it consumes in accelerating and maintaining speed. With less fuel consumption comes less emissions. Research in Germany (Newman and Kenworthy 1992, 39 –40) has shown that the greater the speed of vehicles in built-up areas, the higher is the</i></p>	60

incidence of acceleration, deceleration, and braking, all of which increase air pollution. Other experts argue that a vehicle is operating at its most efficient at approximately 50km/h. Studies have so far not conclusively proven either a positive or negative effect on the air quality due to vehicles travelling at slower speeds: driving at 30 km/h causes some emissions to rise slightly and some to fall, depending on fuel type, engine size and driver behaviour (acceleration and braking etc).

(Continued)

The greatest environmental benefit from the change will come from unlocking the potential for walking or cycling short distances instead of driving. Adopting a smoother driving style can also achieve lower emissions. When 30km/h (18.6mph) zones were introduced in Germany, car drivers changed gear 12% less often, braked 14% less often and required 12% less fuel, (Source: An illustrated guide to traffic calming. by Dr Carmen Hass-Klaus (1990) & www.20splentyforuk.org.uk). See Appendix C for further findings in relation to 20mph (c.30km/h) speed limits in the UK.

In relation to noise pollution, cities in the UK who have introduced 20m/h (c.30km/h) have recorded a noise reduction of up to 40% as a result of slower speeds on their roads. Less acceleration and braking combined with the slower contact between tyre and carriageway over 30km/h all contribute to less noise pollution as a result of calmer traffic speeds. The UKNA report states, "There is a measurable link between traffic noise and speed. In urban areas with speeds of between 20 and 35 mph, reducing speeds by 6 mph would cut noise levels by up to 40%," adding that "Not only is noise pollution an annoyance, but it can also be a significant short and long-term health hazard."

The Transportation Department does not anticipate an increase in congestion. In fact, research indicates that vehicles flow more smoothly through junctions at this reduced speed. Also this proposal is to reduce traffic speeds on residential streets, the default speed limit of 50km/h is to be retained on the main roads (arterial Routes and local roads) leading into and out of the city centre, not effecting congestion levels.

Economic Concerns

On any single journey, it has been established that the proposed 30km/h speed limit can add an average of 20 seconds on to a single journey when exiting or entering a residential area where the lower speed limit has been introduced. All main arterial roads leading to commercial centres will continue to have the existing 50km/h speed limit and as such journey times or congestion on these main roads will not change as a result of this proposal.

30km/h speed limits encourage more considerate driving, leading to safer streets for all road users, including motorists, cyclists and pedestrians, (particularly the young, elderly and mobility impaired). Reducing traffic speeds helps make more people feel more confident about being on their local streets and helps children and the elderly to travel independently and safely. Calmer road speeds also help make walking and cycling more attractive options,

	<p><i>contributing to less traffic congestion, better health, less noise more social interaction and stronger communities.</i></p> <p><i>Our recent survey of 120 residents within the existing 30km/h residential area of Marino revealed an overwhelming support (90%) for retaining their 30km/h speed limit on their residential street, citing some of the above reasons for their continuing support for the 30km/h speed limit in their residential area.</i></p>	
7.	<p>Submission expressed a primary concern that it would be difficult to travel at 30km/h for an extended period of time, (requirement for gear changing etc). Monitoring speedometer is a distraction as motorists not familiar with travelling at 30km/h.</p> <p><i>Response:</i></p> <p><i>The proposal to introduce 30km/h speed limits in Dublin City’s residential areas will not require a driver to travel at the reduced speed limit for a prolonged period of time. This is not a proposal to introduce a blanket 30km/h speed limit. Arterial roads and link roads will retain the existing default speed limit of 50km/h.</i></p> <p><i>Dublin City Council’s Transportation Department has carried out journey time surveys across all of the proposed residential areas in various vehicles (engine sizes and fuel types) to measure the on impact on journey times. The greatest increase to a driver’s journey time would not exceed 1 minute when travelling across the longest route of the largest proposed 30km/h area (Sandymount). However the substantial majority of motorists would see an lvzvjzjzjy {aMÜyVH xy(n{azdm} x Zt{lk Z when accessing a location within the proposed 30km/hr speed zones.</i></p> <p><i>In relation to the various concerns that monitoring the speedometer in a vehicle may be a distraction and the implication that it may be a safety risk; being aware of one’s speed (by a driver observing the speedometer) is a legal requirement for a qualified driver as stated in the Rules of the Road – (Road Safety Authority, 2016, Section 8, Rule’s of the Road. Further guidance on the expectations of qualified drivers in Section 8 of the Rules of the Road in relation to observing sped limits is also available.</i></p> <p><i>In our experience from carrying out a numerous speed surveys while preparing this consultation, we know that vehicles can observe the 30km/h speed limit and drive appropriately.</i></p> <p><i>Example 1: A 24hour speed survey of traffic on Haverty Road in Marino, where a 30km/h special speed limit applies, the average speed recorded of all motorised vehicles was 26km/h (12th – 13th April 2016).</i></p>	47

8.	<p>Expression of the view that this proposal is an initiative to target the motorists specifically (predominantly suggested that the proposal is a new revenue stream from speeding fines).</p> <p><i>Response:</i></p> <p><i>The over-riding principle of a Speed Limit Review is clearly stated as a road safety initiative. This proposal to expand the existing 30km/h zones into residential areas of Dublin City is not aimed at stopping people from driving.</i></p>	34
	<p><u><i>Our aim is to balance the needs of all road users and particularly to make residential areas a safer environment for vulnerable road users creating more 'people friendly' spaces.</i></u></p> <p><i>There is also recognition of the wider role of reduced speed limits in improving the urban landscape. It can be more appealing and conducive to safe physical activity for all (active play, walking, cycling and running) as well as community and neighbourhood interaction.</i></p> <p><i>'Research in 2013 from Edinburgh has shown that the proportion of older primary school children allowed to play unsupervised on the street outside their home rose from 31% to 66% following the introduction of 20 mph (c.30km/h) speed limits. A study carried out in Bristol in 2012 showed that walking and cycling rates rose by 23% and 20.5% respectively following the introduction of 20 mph speed limits there', (Keating, IPH, 2014).</i></p> <p><i>As outlined in the Department's Guidelines" a speed limit should be self regulating (self explaining)" i.e. additional enforcement should not be considered as a requirement for the successful introduction of 30km/h speed limits.</i></p>	
9.	<p>Current traffic regulations are appropriate, and the proposal is not warranted.</p> <p><i>Response:</i></p> <p><i>There is convincing evidence that lower speed limits in residential areas result in reductions in frequency of injuries, severity of injuries and fatalities particularly among vulnerable road users such as older people, people with disabilities and young children. Since January 2009 to November 2016, pedestrians account for 56% of the 66 traffic related fatalities on Dublin City's streets.</i></p> <p><i>One of the main reasons for the introduction of 30km/hr speed limits in Dublin City is to make residential streets and areas around schools safer. Evaluations of a number of pilot schemes in the UK and in Marino in Dublin, demonstrated that local residents felt their areas were safer for walking and cycling. The overall level of support for the 20mph speed limits on residential streets in</i></p>	30

	<p><i>Edinburgh increased from 68% 'before' to 79% 'after', while the proportion of respondents strongly supporting the 20mph speed limit increased significantly from 14% 'before' to 37% 'after', (Turley, M. (2013) South Central Edinburgh 20mph Limit Pilot Evaluation [online] Available at: http://nia1.me/1xh).</i></p> <p><i>Generally, the expansion of the 30km/h speed limit areas across Dublin City will help bring us into line with the rest of Europe where 30km/h, (20 mph in the UK) is fast becoming the default urban speed limit.</i></p>	
TOTAL number of submissions received		550

6.0 Door to Door surveys.

In order to ensure the opinions and attitudes of people whom would be directly affected by an adoption of the Special Speed Limit Bye-Laws 2016, a consultant was appointed by the to undertake a door to door survey, on behalf of Dublin City Council, in parallel to the advertised Public Consultation.

'Delve Research' was appointed to carry out a door to door survey within the areas of Dublin City where we propose to expand the 30km/h speed limit. In addition, we undertook to survey residents of Marino whom already reside within an existing 30km/h special speed limit area.

Delve Research was instructed to interview residents located within the proposed Phase 1 & 2 areas to ascertain their sentiment toward the proposed Special Speed Limit Bye-Laws 2016. The door to door surveys were carried out at randomly selected properties within these areas. The residential areas and the number of surveys completed are outlined below in Table 5;

Table 5 – Number of surveys carried out per location

Proposed Phase	Area	Surveys completed
Phase 1	North City Centre	60
	South City Centre	145
Phase 2	Drimnagh	45
	Crumlin	30
	Phibsborough	30
	Clarehall	25
	Sandymount	25
	Drumcondra	15
	Raheny	15
	Beaumont	15
	Glasnevin North	15

Total	420
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Appendix B provides more details report of the various opinions and attitudes of the residents who were interviewed. In response to the proposal to introduce a 30km/h speed limit in their residential area, we recorded an overall **78%** of those surveyed are in favour of having a 30km/h speed limit introduced in their residential areas.

In addition to the above survey we also carried out interviews with 100 residents located in Marino, where there is already a Special Speed Limit of 30km/h in place since 2005. The purpose of these interviews was to gather an opinion of their experience of the 30km/h special speed limits over the last decade. Appendix B outlines the key findings of these interviews where the headline finding was that **87%** of Marino respondents are satisfied with 30km per hour speed limit.

This is consistent with surveys in both the UK and Netherlands whereby support for the introduction of a 30km/h speed limit grew after the implementation of a 30km/h speed limit.

7.0 International Comparisons

A UK study examining the impact on road safety in 20mph (circa 30km/h) speed zones in 200 small residential areas found:

- 61% reduction in total injuries;
- 70% reduction in child pedestrian injuries;
- 48% reduction in child injuries;
- 6.2% reduction in accidents for each 1mph reduction in speed; and
- On average speed reduced from 25 to 16mph

(Source: Webster, D. and Mackie, A. (1996) *A Review of Traffic Calming Schemes in 20mph Zones. TRL Report 215*. Crowthorne: Transport Research Laboratory).

In the UK, "It has been estimated that a reduction of one mile per hour in existing low speed areas resulted in 5% fewer collisions. A recent review of the effects of 20mph zones and limits on health and health inequalities concluded that there was convincing evidence on the effectiveness of these measures in reducing accidents, injuries, traffic speed and volume, as well as improving the perception of safety, (Sources: Taylor, M. C., Lynam, D. A. and Baruya, A. (2000), , and; Cairns, J., Warren, J., Garthwaite, K., Graeme, G. and Bamdra, C. (2014)).

Studies in the Netherlands reported similar effects at 30km/hr:

- 5% reduction in accidents;
- 25% reduction in injuries;

- 85% of traffic travelling at a mean speed of <30km/hr and a 15-30% reduction in traffic volume;
- 25% in injuries over a 15 year period;
- considered to be a cost-effective intervention.

(Source: Janssen, S. (1991) Road safety in urban districts: final results of accident studies in the Dutch demonstration projects of the 1970's. *Traffic Engineering Control* 32 292-296)

A German study found a 25% reduction in accidents in an area where 30km/hr limits were in place. In Denmark, 15-30km/hr speed zones were associated with a 64% reduction in road user injuries; whilst a London based study reported a 45% reduction in injuries in 20mph zones.

(Sources: Brilon, W. and Blanke, H. (1990), and; Engel, U. and Thomsen, L.K. (1992) and; Grundy et al 2009 Grundy C et al. (2009)).

Concerns expressed in relation to the introduction of 30km/h speed limits:

In relation to identifying the arguments against the introduction of 30km/h speed limits from international experiences, there is no evidence available from our online research that records negative outcomes, post implementation of a 30km/h speed limit, (international experiences from Toronto, UK cities, France, Austria & Germany are included in this research, albeit that our research is not exhaustive).

Many of the concerns expressed before the introduction of a 30km/h speed limit in other cities are very similar to those raised through our own Public Consultation. Concerns raised include:

- The current speed limits are appropriate (York University - Toronto)
- Changing the speed limit on its own is not sufficient to reduce speed limits (Toronto - Steve Buckley, head of transportation services), "Just simply changing the speed limit in and of itself is not shown to significantly reduce travel speeds," he said.
- Additional Enforcement is required to successfully implement a reduced speed limit, (Edinburgh Council).

All the identified concerns raised by international commentators prior to the introduction of 30km/h speed limits were similarly raised through Dublin City Council's Public Consultation process and our responses are as per Section 5.0.

8.0 Recommended amendments to the proposed Special Speed limit Bye-Laws 2016

It is recommended to include 3 amendments to the proposed Special Speed Limit Bye-Laws 2016 from those published on our consultation, namely:

- c. Retain **City Quay** at 50km/h as opposed to the proposed 30km/h;
- d. **Inchicore Road** is to be have an additional 30km/h speed limit put in place, adjacent to the Kilmainham Gaol where the recent public realm work has been completed, (from the junction with the South Circular Road to the junction with Memorial Road), and;
- e. If the Special Speed Limit Bye-Laws are adopted, the revised proposed dates for their implementation are as follows:
 - i. Phase 1 - March 31st, 2017
 - ii. Phase 2 - May 31st, 2017

9.0 Project Cost Estimate

The capital cost to implement Phase 1 & Phase 2 requires the installation of road signs and poles at each point where a speed limit changes as a result of this proposal being implemented.

The Transportation Department has carried out an assessment of the works required so as to prepare a best estimate for the costs of the work.

In preparing this cost estimate, we have endeavoured to ensure existing signage poles are utilised where appropriately located to minimise the costs.

The following is the cost estimate for each phase to be implemented; it includes acquisition of materials and installation of required signage:

Phase 1: €190,000

Phase 2: €160,000

10.0 Conclusion

The principle of giving the Elected Members of Local Authorities the power to make bye-laws (as a reserved function) for the purpose of applying Special Speed Limits which was established in 1994, is retained in the Road Traffic Act 2004 and introduced fundamental changes to the process of making bye-laws and the range of powers available to Local Authorities.

As originally set out in the Road Traffic Act 1994, bye-laws should generally be made in respect of a Local Authority area as a whole. Dealing with proposals for specific areas or roads on an independent basis should be avoided unless it is deemed necessary or appropriate to do so, particularly on the grounds of safety.

These proposed Special Speed limit Bye-Laws 2016 set out a staged introduction of an expanded 30km/h speed limit in predominantly residential areas and in proximity to schools. Should these Bye-Laws be adopted, the intention of Dublin City Council's Transportation Department is to continue with the roll out of 30km/h speed limits in all residential areas across the local authority as a whole, This would be a phased implementation programme and would be with the required public consultations and in due course complying with the Road Traffic Act 1994.

The overriding principle that must inform any decision to change a default speed limit should be Road Safety, in particular, the reduction of fatal and serious road collisions. From our examination of international experiences and from an assessment of the existing 30km/h speed limit areas in Dublin City, all have recorded only positive outcomes in terms of this road safety objective. Other environmental benefits have also been recorded, such as positive feedback from residents who live within a designated 30km/h area, and their continued support for 30km/h speed limits post introduction.

The predominant perceived negative impact of slower speeds from some submissions, is a substantial additional journey time that motorists will incur. As evidenced by our trials, the additional journey time for any one journey would be at most 1 minute on a single journey through a proposed area; however the average journey time would increase by approximately 30 seconds. This has to be considered against the benefits which have been evidenced as well as the environmental benefits outlined in this report.

It should be recognised both from experience in Dublin City of introducing a 30km/h area and international experiences, that changing signage on its own will not be sufficient. These Bye-Laws propose to lower the speed limit in residential areas which are deemed most compatible to achieve a calmer traffic environment, (i.e. where the average speeds of traffic are recorded to be relatively low and where engineering interventions have already been deployed at many of the locations). It can be expected that continued accompanying measures will be required should we wish to successfully change driving behaviour in terms of slowing traffic speeds. This may include

further engineering interventions, educational awareness campaigns in association with other state agencies and continued enforcement of the traffic law.

Our recently published Road Safety Strategy 2020 sets out our objectives in terms of these complimentary actions. Indeed, continued engagement with the public is essential to ensuring the successful delivery of a 30km/h special speed limit.

The door to door surveys which we conducted provided valuable insight into the attitudes of the residents who would reside within the proposed Phase 1 & Phase 2 areas. A significant majority in each area is supportive of the proposed bye-laws, with an average level of support being 78%. When recently surveyed, 98% of residents in Marino said they would oppose the removal of the 30km/h speed limit in their area, such is their satisfaction with the reduced speed limit there.

The backdrop to our city's traffic trends is measured in part by our annual cordon counts, which show a continued rise in the numbers of people accessing our city centre since 2010. In particular, there are increasing numbers of people walking and cycling. The Dublin Cordon traffic counts between 2006 and 2015 record an increase in numbers entering the city on foot (8.3% to 9.4%) and by bicycle (2.3% to 5.4%). Numbers of vehicles crossing back and forth over our canal cordon on a daily basis are in excess of 400,000 vehicles per day. The safe and efficient management of this increasing traffic volumes year on year is also a pertinent to our consideration for how we manage the speed of traffic in the coming years.

Chapter 5 of our Dublin City Development Plan aligns its objectives closely with the expected outcomes of a successfully implemented reduction in traffic speed in residential areas and in the proximity to schools. In particular, objective SIO15 of our Dublin City Development Plan outlines our undertaking "to implement a 30kph speed limit inside the city centre (area between the canals)" while continuing to support the prioritisation of sustainable forms of transport, particularly walking and cycling. In conclusion, this proposal is considered by the Transportation Department of Dublin City Council to meet the requirements of the Department of Transport, Tourism & Sport's 'Guidelines for Setting and Managing Speed Limits in Ireland 2015'.

11.0 Recommendation

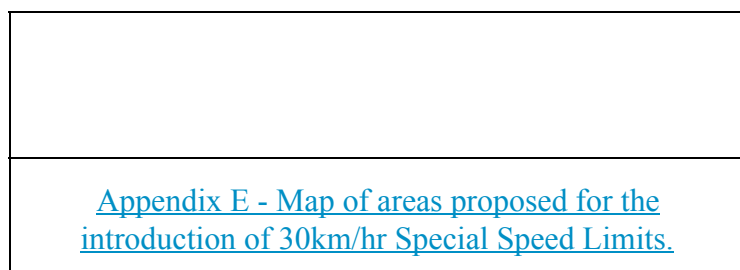
The expansion of the 30km/h speed limit areas across Dublin City will help bring us into line with the rest of Europe where 30km/h, (20 mph in the UK) is fast becoming the default urban speed limit and where 'after' studies which we have observed, consistently report significant improvements in road safety records. Notably, our door to door surveys recorded significant

support for this proposal among residents within the areas where the 30km/h speed limit is being proposed.

The Transportation Department of Dublin City Council recommends to the Strategic Policy Committee for Transportation that the proposed Special Speed Limit Bye-Laws 2016 (as published for Public Consultation in July and August of this year, with the inclusion of the amendments set out in Section 8.0 of this report) be submitted to the full Council for their adoption.

Appendix A - www.dublincity.ie/speedreview

Public Consultation on proposed Special Speed Limit Bye-Laws 2016



The public consultation has now closed.

Dublin City Council is undertaking a review of speed limits within our administrative area and wish to engage through consultation with members of the public, with particular regard to the extension of the 30km/hr speed limit into further residential areas of our city.

The review of current speed limits is being undertaken in accordance with the publication of the **'Guidelines for Setting & Managing Speed Limits in Ireland' (March 2015)** published by the Department of Transport Tourism & Sport. The principle objective of assessing the appropriate speed limits for our roads and streets is to ensure that the set speed limits are as safe and appropriate as possible for vulnerable road users, including children.

[The Road Traffic Act of 2004 \(Section 9\)](#) sets out the current legislative basis for the setting of speed limits. The setting of special speed limits is a function of the Elected Members of the council. The current speed limits were last reviewed and updated in 2011. The default speed limit in Dublin City is 50km/hr with a selection of areas, roads and streets where a special speed limit of 30, 60 or 80km/hr are also in place, ([Please see map of the existing Speed Limits in Dublin City Council's area - Appendix C](#)).

This Public Consultation has two purposes:

- Seek public acceptance for the introduction of revised Special Speed Limits Bye-Laws 2016 which include additional 30km/hr zones in the Dublin City Council administrative area.
- Seek public feedback in relation to identifying additional areas for the introduction of additional Special Speed Limits for a subsequent Public Consultation in 2017.

Submissions may be made online, on or before 5pm on Wednesday 24th August 2016. Submissions can also be made in writing marked "Speed Limit Review" to the Senior Engineer, Transport Operations, Environment & Transportation Department, Dublin City Council, Civic Offices, Wood Quay, D08 RF3F, or via email to speedreview@dublincity.ie. A hardcopy of the proposed Special Speed Limit Bye-Laws 2016 is available for inspection at all Dublin City Council Libraries, Civic Offices and Local Area Offices for the duration of the Public Consultation.

The following publications are pertinent to current speed limits review:

Public Consultation Documents

- [Explanatory note for the proposed DCC Speed Limit Bye-Laws, 2016. This includes Appendices A & B.](#)
- [Appendix C – Existing Dublin City Council Speed Limits \(Since 2011\).](#)
- [Appendix D – The proposed 'DCC Special Speed Limit Bye-Laws, 2016', including the 'Schedule' of proposed roads and streets for the introduction of additional 30km/hr Special Speed Limits / As Gaeilge](#)
- [Appendix E - Map of areas proposed for the introduction of 30km/hr Special Speed Limits.](#)

Frequently Asked Questions

Links to related documents and websites

- [Take part in our online survey to further understand the opinions of the public](#)
- [Watch the presentation of the proposed Special Speed Limit Bye-laws to the Strategic Policy Committee for Transportation in Dublin City Council \(25th May 2016 – Item 7\)](#)
- [Link to Department Transport Tourism & Sport website to access the 'Guidelines for Setting & Managing Speed Limits in Ireland' \(March 2015\)](#)
- [Love 30 Campaign information](#)
- [Fatality numbers in Dublin City Council's administrative area since January 2009](#)
- [Edinburgh is introducing the reduction of speed limits to 20mph \(approximately 30mph\). Read about their project](#)
- [The UK campaign group "20's Plenty"](#)
- [Publications by the Road Safety Authority in relation to vehicle speed](#)
- This [leaflet](#) from the Road Safety Authority highlights the key statistics in relation to the impact speed has on road safety.
- [Map of existing Speed Limits in Dublin City Council Area](#)
- [Visit the website of the Department of Transport, Tourism & Sport for related and supporting documentation](#)
- [European Network for 30 km/h - making the streets of Europe liveable.](#)
- [Australian Road Safety: Towards Zero – Project Graham](#)

Appendix B - Door to door surveys

In order to ensure the opinions and attitudes of people whom would be directly affected by the adoption of the Special Speed Limit Bye-Laws 2016, a consultant was appointed to undertake a door to door survey on behalf of Dublin City Council in parallel to the advertised public Consultation.

Delve Research provides a full range of marketing research services and research consultancy, including the design, administration and analysis of telephone, paper based, online and face-to-face surveys. Satisfied clients come from a wide range of industries, including financial services, agribusiness, retail, hospitality and the professional services sector, as well as the public sector. Satisfied clients include Dublin City Council, The Office of the Ombudsman of Ireland, AXA Insurance, Enterprise Ireland, URS Ireland, AIG Insurance, the Health and Safety Authority of Ireland, Laya Healthcare (formerly Quinn Healthcare / BUPA Ireland), Smurfit Kappa Ireland and Coillte.

Survey Overview

“For the purposes of this survey we used a team of eight interviewers conducting face-to-face interviews with respondents who were at their places of residence within the defined areas. These interviews were conducted at various times of day between July 18th and August 17th 2016.

Within the areas of proposed roll-out of the 30km per hour speed limit we achieved 420 survey responses. As a representative sample of households in these residential areas this is a good volume, with an overall statistical margin of error of +/-4.8%. We used quotas to ensure good gender representation, and we achieved good representation across age groups and socio-economic backgrounds. This survey showed a high level of support for the proposed introduction of the 30km per hour speed limit, with 78% in favour.

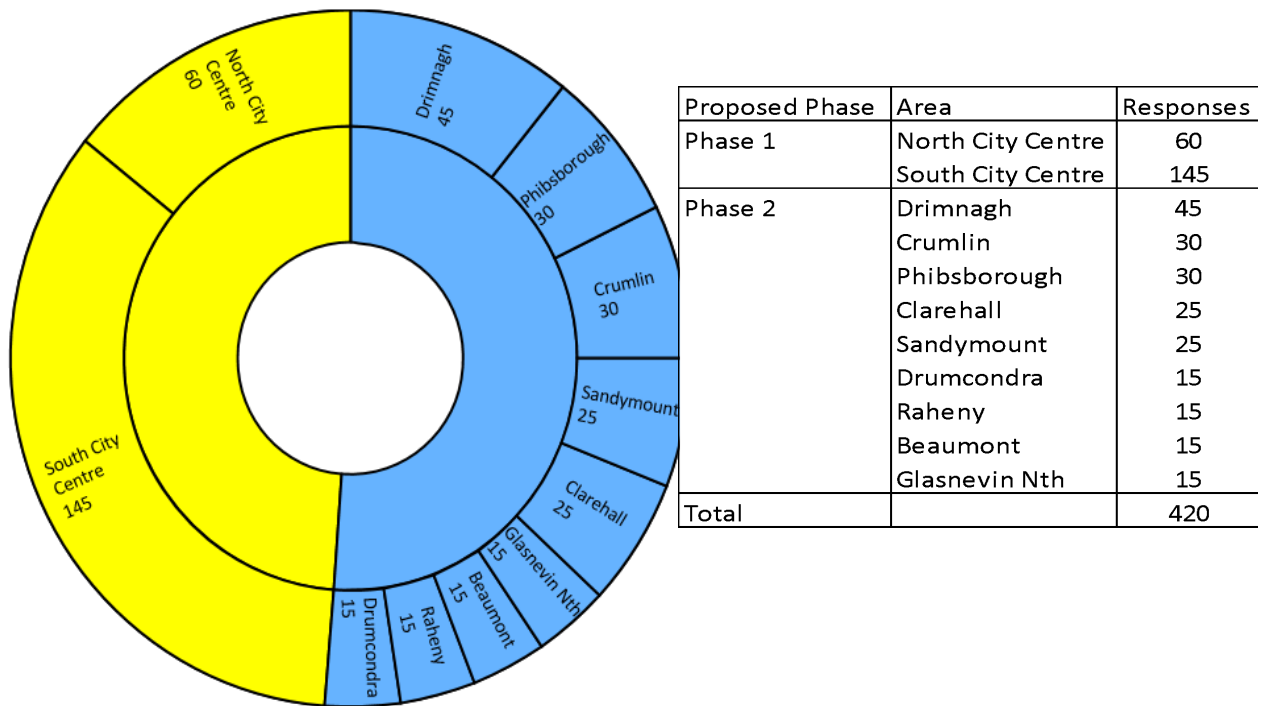
In parallel with this we also surveyed 100 households in the Marino area, where the 30km per speed limit is already in place. Using the same methodology as for the larger survey, we employed gender quotas and achieved good representation across other demographics. 87% of those surveyed in Marino were satisfied with the 30km per hour speed limit, and 82% would support the introduction of the 30km per hour speed limit in other residential areas.” *(Daniel Sheahan 02/09/2016)*

The survey involved meeting and interviewing the residents of 520 residential houses in total.

Part A of the survey included interviews with **420** of the residents located within the proposed areas of Phase 1 (205 interviews) & Phase 2 (215 interviews).

Part B of the survey included interviews with **100** residents located in Marino, where there is already a Special Speed Limit of 30km/h in place since 2005 so as to gather an opinion of their experience of the 30km/h special speed limits over the last decade.

Figure 2: Phase 1 & 2, response rate per area



Phase 1 & 2 – Survey Summary

In response to the proposal to introduce a 30km/h speed limit in their residential area:

- **79%** agree that traffic speeds affect how safe they feel when walking or cycling.
Highest in Crumlin / Drimnagh, lowest in Sandymount;
- **78%** in favour of having a 30km per hour speed limit in residential areas.
Highest in Crumlin / Drimnagh, Clarehall and North City Centre.
Lowest in Sandymount;
- **75%** feel it would be acceptable for the Local Authority to introduce more engineering solutions in their area to calm traffic speeds.
Highest in Crumlin / Drimnagh, lowest in Beaumont / Raheny;
- **41%** say slower traffic speeds would encourage them to walk or cycle more.
Highest in Crumlin, lowest in Sandymount;
- **29%** feel that enough is being done by Dublin City Council to control traffic speeds
Highest in Phibsborough, lowest in North City Centre;

- **Cars speeding** and **risk to children** were the two greatest concerns people had around speed limits.

Marino – Survey Summary

In response an interview about their attitudes toward the existing 30km/h speed limit in their residential area:

- **87%** of Marino respondents satisfied with 30km per hour speed limit
- **91%** report being fully in favour of the 30km per hour 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 30km per hour speed limit in other residential areas

Appendix C - Findings in relation to 20mph (c.30km/h) speed limits in the UK.

20mph limits Improve Air Quality

Where People Live

A 20's Plenty for Us Factsheet – Published October 2010

20's Plenty



Where People Live

Many people assume that at lower speeds extra fuel is used and more pollution created. In fact the reverse is true. That's why "Total 20"¹, without traffic calming, is supported by so many environmental organisations. The facts :-

When 30km/h (18.6 mph) zones were introduced in Germany, car drivers changed gear 12% less often, braked 14% less often and required 12% less fuel².

Choice of gear and driving style, not the number on the speed limit sign, most affect fuel use³. DfT guidance states, "Generally, driving more slowly at a steady pace saves fuel and carbon dioxide emissions, unless an unnecessarily low gear is used".

Most Continental European towns enjoy a 18.6mph limit (30km) which supports road safety and sustainable transport. Stop/go driving is typical in urban areas. Distances drivers could legally and safely go at 30mph is limited by traffic lights, crossings, congestion, junctions and pedestrian and cyclist numbers. 20mph limits cut unnecessary acceleration and braking and improve traffic flow.

A report from Belgium⁴ concluded "It is unlikely that imposing strict speed limits in urban areas has a significant influence on emissions of NOx or CO2."

The likelihood of modal shift to non polluting modes due to better safety brings reduced fumes. Each trip transferred from a motorised vehicle has a fuel consumption of 0mpg and less noise. Plus reduced congestion and standing traffic, which pumps out more emissions than moving vehicles.

High vehicle speeds are the greatest deterrent to walking and cycling instead of driving. In Hilden, Germany, the percentage of in-town trips made by bicycle increased to 23% after the introduction of an 18.6 mph residential limit. Britain's default 30 mph limit is 60% higher than most Northern European towns where far more citizens enjoy the opportunity to walk and cycle in greater safety. UK pedestrians form a greater percentage of road fatalities (22.5%) than any other EU country⁵.

The AA's report, Fuel For Thought (Jan 2008) "accepts that targeted 20 mph speed limits in residential areas are popular and improve safety. Along shorter roads with junctions and roundabouts, limiting acceleration to up to 20 mph reduces fuel consumption"

Research from the ETA⁶ found that cyclists and walkers face pollution levels two thirds lower than inside a car. Drivers and their passengers face three times more fumes because they sit in the pollution tunnel in the centre of the road, breathing poisons from vehicles in front.

Road Traffic produces one fifth of carbon dioxide, over half of nitrogen dioxide and over 75% of carbon monoxide emissions in the UK. (DETR Winter smog/summer smog 1998 July)

20's Plenty for Us welcomes comment and feedback, so please contact us if you have or need any further information

¹ Total 20 is the setting of 20mph as the default speed limit across a whole Traffic Authority or community without calming.

² An illustrated guide to traffic calming. by Dr Carmen Hass-Klau (1990)

³ Newman & Kenworthy (1992). http://www.nap.edu/openbook.php?record_id=9676&page=369#p20003296ttt00035

⁴ Luc Int Panis Carolien Beckx and Steven Broekx, Association for European Transport and contributors 2006 Impact of 30 Km/H zone introduction on vehicle exhaust emissions in urban areas -

⁵ European Road Safety Observatory – Traffic Safety Basic Facts 2009 – Pedestrians

⁶ Environmental Transport Association. Road User Exposure To Air Pollution Nov 1997