

Limerick Cycling Campaign



Limerick Cycling Campaign advocates for improved cycling infrastructure in Limerick City so that more people, of all ages and abilities, can choose cycling as a realistic, safe, efficient and enjoyable way of getting around.

South Circular Road to City Centre Active Travel Scheme

To whom it may concern,

Limerick Cycling Campaign warmly welcomes Part 8 consultation for the South Circular Road (SCR) to City Centre Active Travel Scheme. This important key artery for our cycling and walking network has been continuously delayed over the past decade and its progress to part 8 planning is very welcome. This designated primary route will link a quarter of our city's population from the suburbs of Raheen, Dooradoyle and Ballykeefe directly to the City Centre in a safe, connected and coherent route.

The scope included in this scheme shows a vision of a larger, more connected plan than we've seen previously in Limerick. This scheme will connect homes, businesses, schools, colleges and community facilities along this western spine of the city. For the first time it will enable schools and colleges to promote active travel as a viable alternative to the 6,000 plus students that use the SCR to access education, this will enable those institutions to meet their sustainable development goals (SDG) and green flag sustainable travel criteria to deliver a healthier and vibrant neighbourhood and city.

It is essential that decision-makers such as the NTA, local engineers, the executive and elected representatives remember the huge percentage of residents and voters from the suburbs of Limerick City West that will benefit from this and to keep their interests at the centre of their decision making.

This project delivers on local and national sustainable transport policy and is underpinned by national policy and legislation such as the National Investment Framework for Transport in Ireland (NIFTI), the Sustainable Mobility Plan and Limerick Council's responsibilities under the Climate Action Plan and its Annex of Actions. It is also fully supported by the new Limerick/Shannon Metropolitan Area Transport Strategy (LSMATS) and its inclusion in the latest (and many previous) Limerick Development Plan. It is incumbent on all arms of the Council apparatus to deliver this primary route in as short a time frame as possible and to as high a standard as possible.

We support this scheme with the follow recommendations

5 Key Asks:

1. Delivery of all sections to the highest standard as the designated primary active travel route for more than 25% of city residents.
2. Full filter at Lifford Ave.
3. Full segregation from New St to St Gerard St to provide a safe route to schools.
4. Continuity across junctions with cyclist priority signals
5. The addition of a connecting cycle path to the Model School via Quinn St.

Detailed Planning Observations:

Layout Sheet 1 of 5: Ballykeeffe Roundabout to South Circular Rd

“Bollards required where 3m cycle track width is not achievable” We would ask that this is changed and better aligned with national policy with a tightening of car lanes to retain the proper width of the cycle lanes the entire length of the flyover section. We believe the left turn into the shopping centre does not require its own slip road or the hatching leading up to it. The removal of this would mean no narrowing of the other car lanes or cycle lanes and would also allow for the planters to begin closer to the inwards bus stop.

While we acknowledge the tightening of the left turn off the flyover to the Crescent Shopping Centre we do note that it deviates from the continuous footpaths delivered across the rest of this project. Ideally as this is an incredibly dangerous exit for active modes we would prefer to see this completely closed on health and safety grounds. If not we would ask that continuous and raised footpaths are installed at a minimum. The question must be asked whether this single lane entrance to the shopping centre is needed when 3 other entrances are provided?

We would ask that the currently unused bus stop on the flyover be removed. There is no current use of it and no planned use for it. It is an unsafe place for pedestrians to enter and exit a bus because of the steep incline. There are stops on either side of the flyover so its inclusion serves no purpose.

We would also ask that the priority travelling east on the western junction of SCR and Ballinacurra Rd be amended to allow free flow of bikes from the flyover and the currently operating yield box be instead retained for cars turning left onto SCR from the flyover. This will have the better outcome of slowing the more dangerous mode at a key conflict point.

The moving of the crossing point is very welcomed. As the excessive speed of citybound cars can be an issue coming off the flyover, we would ask that in line with other sections of the project the crossing be raised with a notable surface colour change. As the scheme will link into the Baggott Estate cycle path we would ask for the removal of all bollards from the entrance to Baggott Estate. Current NTA guidance calls for the removal of barriers like this

as they actively discriminate against non-standard bicycles, mobility scooters/mobility aids and those using wheelchairs. This link to the Baggott Estate cycle lane is essential to allow access to sports clubs in Ballinacurra as well as linking to the upcoming Active Travel Scheme on Childers Rd which will finally deliver a safe and connected cycle route from City West to City East.

We welcome the continuous footpaths and landscaping that is proposed for the length of the South Circular Road. The inclusion of the traffic and parking reports shows there has been significant thought given to residents in retaining parking. We would caution that any further accommodations along the main thoroughfare runs the risk of undermining the goals of this project on this stretch of road.

Layout Sheet 2 of 5: South Circular Rd, Lifford Ave to Fennessey's Junction

While we welcome the concept of filtered permeability and a Low Traffic Neighbourhood (LTN) for this section we do have some concerns that this section may not deliver the intended result for cyclists using this route.

A low-traffic neighbourhood requires an Annual Average Daily Traffic (AADT) count of 2,500. Currently the report issued alongside this project shows a current AADT of 4,400 with the proposed intervention predicting a reduction to 2640 once the project is delivered. This breaks the cap of 2,500 that is required to progress with the shared space for cars and cyclists on this stretch. At these AADT numbers segregation is the clear preferred and mandated option.

We would suggest two possible solutions to this:

1. The removal of parking and car lane along the northern side of the road to allow for the continuation of the segregated cycle lanes either end of this stretch, with the addition of a one-way system for cars,

or,

2. For the filtered permeability at the junction of Lifford Avenue to extend across both sides of the road.

The second option would be significantly less intrusive for residents along the route and would hopefully bring the AADT numbers down to what they are required to be for a LTN. We would see this as a significant compromise by cyclists to enable this section to proceed as designed, especially considering its designation as a key primary route.

We also have significant concerns that the half filter on Lifford Ave will simply be used as a chicane by dangerous drivers. A full filter will completely eradicate this danger and should be included as part of the revised plans post-consultation. This would also help further the traffic reduction needed to adopt an LTN approach along this stretch.

We would also ask that following delivery of the project that there are traffic counts

undertaken at 6 and 12 months out to ensure the interventions here are delivering a safe environment for cyclists and the AADT reductions that are required. While we are eager to see the LTN model work on this stretch if AADT counts do not meet the required threshold we would expect a follow up project to further address cyclist safety.

The realignment of parking on the western stretch of this road near Thumbelina's creche is a positive move. It retains parking for residents while creating a chicane for cars. It is a minor change but one that will significantly reduce car speed on a stretch of road infamous for high speeds and risk taking by drivers.

At the junction of SCR, New St and Ashbourne Ave (the Fennessey's Roundabout) we welcome the tightening of the junction and the removal of the current roundabout. In line with other similar junctions along this route, and in light of it's close proximity to Scoil Mhathair De we would ask that a raised table similar to that installed at the following inbound junction at Mary Immaculate College be placed here as well.

Layout Sheet 3 of 5: South Circular Rd - New St to Quin St

While we are very positive about this stretch we do note that the cycle lane is tightened below what is required at certain points. In line with the priority placed on active modes we would request that where tightening does need to happen that the space needed is taken from the car lane.

The plans here do not offer sufficient clarity on the junction that links the north and south campuses of Mary Immaculate College. We would ask that the space here is confirmed to be a raised table and that all clarity is given to drivers to know that they must yield to pedestrians and cyclists across this junction. This is a high pedestrian and cycle area with significant numbers of 3rd level students and primary school children. This area has the potential to provide an excellent living area connecting the primary school and both of the MIC campuses in a more holistic manner.

We would also suggest that the crossing point at Quin St be converted to a toucan crossing with parking on one side of Quin St removed and converted to a two-way cycle lane to connect to the Model School. We would also ask that a disabled parking bay be marked at the parking spot on Quin St where it meets SCR to provide for any future needs of older residents.

It is clear from both the options report and the daily experience of cyclists and pedestrians using this route that it is currently an incredibly dangerous environment. The modal share for active modes is significantly lower in the schools on this stretch as a direct result of the current misuse of the public road to provide parking and car access. We agree that the reallocation of the on street parking to provide space for segregated cycling here is the only possible option as per the options report issued. With the sheer number of vulnerable users here due to the schools along this stretch their safety must be the primary driver of change. We note that housing in this area has adequate parking within their own front and rear spaces with some properties having the capacity to store upwards of 20 plus vehicles.

We note the addition of a significant car park added at the junction of Laurel Hill Ave. We feel this offers a generous amount of additional parking space to residents, especially in the context of many of the houses in this area having significant internal space for multiple vehicles. We would note that this may contravene the National Investment Framework for Transport in Ireland (NIFTI) and consider the development of a private car park for residents an extraordinary level of mitigation and goodwill by the Council. Any retention of on street parking along this stretch post consultation would invalidate the project aims completely and must be avoided at all costs. The AADTS and the make up of vulnerable road users attending schools also means that any push for shared space simply cannot be entertained and full segregation as per the plan is the only option available for this section.

There are over 6,880 students from primary schools, secondary schools and 3rd level institute Mary Immaculate College attending institutions on the South Circular Road (Scoil Mháthair Dé - 342 pupils, St. Clements - 449 pupils, Laurel Hill Coláiste - 397 pupils, Laurel Hill FCJ - 692 pupils and Mary Immaculate College - 5,000 students). The route also provides passage to pupils of Limerick school project (200 pupils) and an Mhodh Scoil (620 pupils)

As the road is very narrow and very congested at peak traffic times the only safe way for these students to travel is by car. By implementing a primary cycle route on SCR it will help meet Climate Action Plan goals and will accelerate sustainable mobility plans for schools and colleges as outlined in the National Sustainable Mobility Policy. Most valuable of all it will provide our young citizens with the autonomy to commute independently and eliminate many car escort journeys.

Layout Sheet 4 of 5: South Circular Rd - St Gerard St to Newenham St

The one way system changes across this section of SCR, inclusive of Quin St and St Gerards St are excellent additions which allow a clear orbit for school drop offs in the area. As a result of this it will spread traffic further along O'Connell Ave rather than the current build up from the western end of SCR. We would expect this to have significant downstream impact on AADTs as a result.

While the junction does show raised continuous footpaths and cycle lanes east-west across the junctions we feel that there is scope to raise this section of the route into a full raised table. Speeds descending the hill from the Redemptorists tend to be on the higher end of the scale and a stronger intervention here would reduce speeds at a junction that has a history of collisions.

The junction with O'Curry St is a notoriously dangerous junction for cyclists with it being one of the highest accident blackspots in the metro area. The continuous cycle lanes and footpaths are an excellent addition across the entire project but hugely so for this stretch. We could see further space for tightening the left hand turn from O'Curry St towards Henry St if possible.

Layout Sheet 5 of 5: Hartstonge St, Mallow St, Mill Lane

While largely positive about this section we do have some observations. The junction of Henry St and Mallow St needs continuity for cyclists through the junction. We would ask that the cycle lane be continuous and raised. High speeds downhill along Mallow St are an issue and a raised bike lane will help change driver behaviour.

Mill Lane is a good temporary solution within this project to link the cycle lane towards the Shannon Bridge Roundabout. We would ask that future projects would look at the Shannon Bridge Roundabout and Mallow St in a more holistic fashion and address how it can connect to this project.

While we welcome the improvements to the footpaths and the landscaping on the section of Mallow St between Henry St and O'Connell Ave we would ask that the landscaping be undertaken in a way that ensures space for any future cycle lanes is not impeded.

We feel there is potential to continue the one way system further along this section of Henry St as far as the junction of Mallow Street. Traffic flow outbound on this route is incredibly low and retaining a two way system here isolated between the one way systems either end of it makes little sense and could be considered a poor use of precious road space. The removal of the outbound car lane could be repurposed as resident parking without any impact to the proposed pedestrian and cycling infrastructure. If this is possible we would ask that any potential retention of parking here is focused on residents first with a follow up campaign by the Council to ensure all existing residents are encouraged to apply for Residential Parking Permits. We would further request that there is a clearway retained outside Richmond Terrace sheltered housing that will facilitate ambulance/GP visits as well as grocery deliveries to the people living in this development.

Limerick Council's commitment to Sustainable Development Goals

Mobility is an essential element of development strategies that aim to achieve the Sustainable Development Goals (SDGs)*. Meeting the needs of people who cycle continues to be a critical part of the mobility solution for helping cities de-couple population growth from increased emissions, and to improve air quality and road safety. [Cycling and Sustainable Development Goals](#)

This scheme is essential to provide a sustainable, healthy and community focussed alternative to the private car for residents of Limerick City West.

Conclusion:

We would like to thank Limerick Council, the NTA, Punch Consulting Engineers and the Active Travel Office on what is the strongest plan they have put forward to date. It shows a range of interventions and approaches with a more holistic approach to linking the suburbs to the city centre than before. It is quite clear that there has been extensive consultations with residents in advance of this part 8 consultation phase. There have been significant concessions and compromises given at certain stretches of the project in particular. We are concerned that a small number of these concessions are flying quite close to the sun and we would caution against any further watering down of interventions to protect cyclists in certain sections.

We believe that as well as providing the required primary route for cyclists and pedestrians this route will be transformative for residents in the area who have been held hostage by rat running and unnecessary school traffic for many years. We would expect to see improvements to noise and air pollution as well as a far more liveable space for the communities that live along the route.

This route is one of the essential primary spurs of the Limerick Metropolitan Cycle Network and will link a quarter of the population to the city centre. Its importance to the growth of the city centre, to our climate obligations and to the wellbeing of our city can not be overstated. We look forward to its rapid delivery over the coming months.

Regards,

Conor Buckley
Chair, Limerick Cycling Campaign