



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

**Bellfield Gardens Filtered Permeability Trial
Non-Statutory Public Consultation**

Report & Recommendation

March 2023

REVISION	ISSUE DATE	DESCRIPTION	PREPARED	APPROVED
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1. Introduction & Project Overview

1.1 Introduction

The TUS to City Active Travel Scheme Part 8 statutory process commenced on 3rd August 2022. The scheme included for segregated cycle track along the R445 and a shared surface along Thomond Row and Bellfield Gardens. A future scheme is proposed to continue along the R445 as a Primary Cycle network and the shared surface was proposed as an interim measure ahead of the future scheme development.

33 submissions were received from members of the public through the Part 8 process before the closing date for submissions of 14th September 2022. Of the 33 submissions received from the public, 21 of these submissions raised concerns about the shared space along Bellfield Court and Bellfield Gardens and several suggested that filtered permeability or a one-way systems might be considered.

At a Briefing with Metro North Councillors on 4th October, Active Travel presented a summary of the issues being raised in the Part 8 submissions, noting that the main issues were the proposed shared surface on Bellfield Gardens, proposals for filtered permeability and one-way systems and provision of improved linkage to the city.

To address this, Active Travel suggested that a trial could be considered to establish the impact of a filtered permeability option on Bellfield Gardens and a draft trial arrangement was presented for discussion. To inform the Part 8 decision, it was proposed to undertake the trial in parallel with the Part 8 process with provisional trial dates of 1st November to 22nd November 2022.

Active Travel reviewed the trial process utilising a 2 week non-statutory public consultation.

The purpose of the public consultation was to gather feedback on proposals over the 2 week period from 10th October to 24th October 2022.

This was posted on the Council MyPoint Consultation Hub <https://mypoint.limerick.ie/>, with the facility to make submissions via My Point or by e-mail to activetravel@limerick.ie

In addition to placing the information on MyPoint a leaflet drop was completed locally with approximately 450 letters advising of the proposal and how to make submissions.

Details of the leaflet are included in Appendix A.

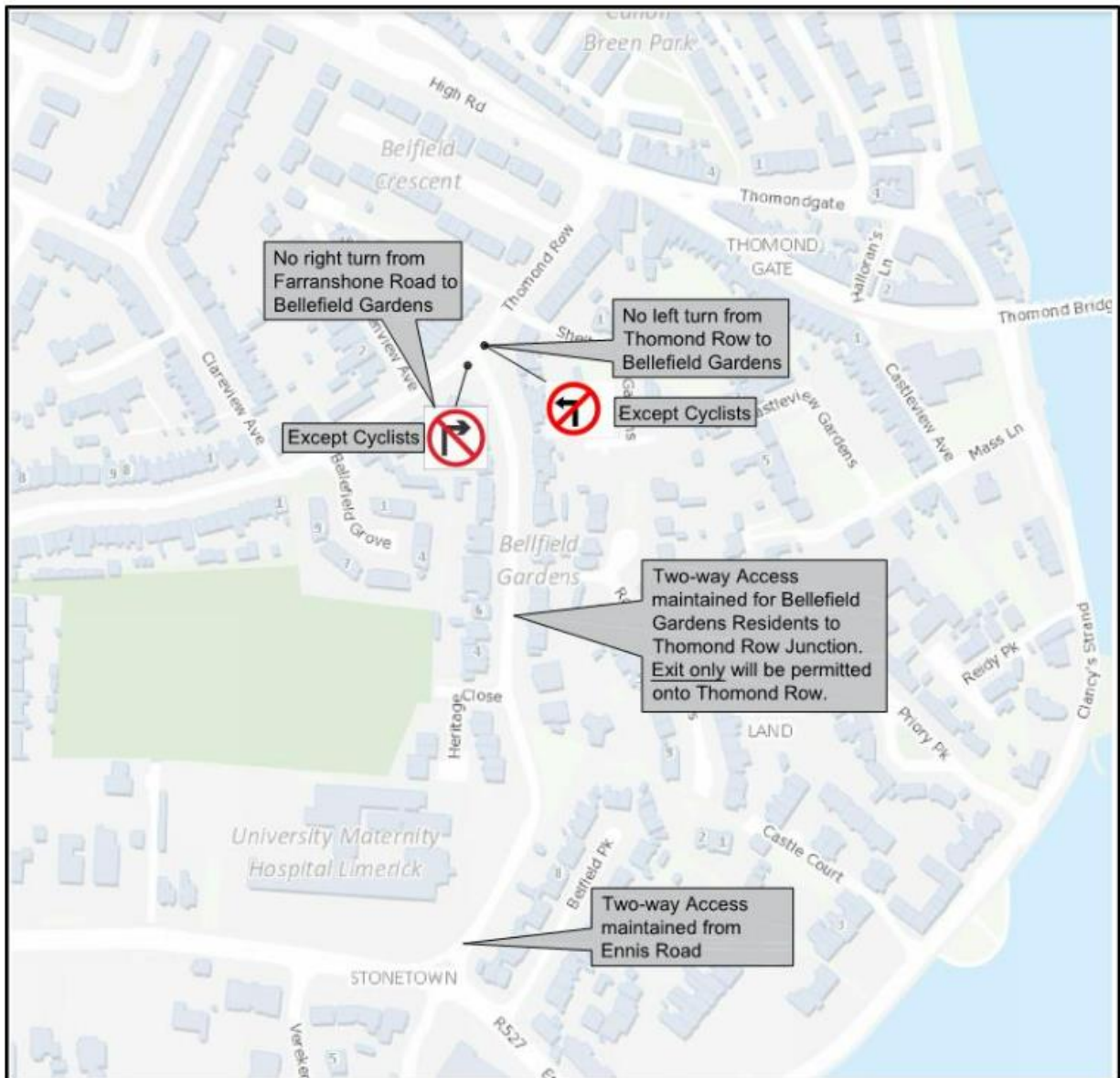
1.2 Project Overview

The proposed trial was for the restriction of vehicular traffic travelling from the north of Bellfield Gardens through Bellfield Gardens for a 3 week period. Cyclist and pedestrians would be allowed continued access.

The first week of the trial was to co-incide with Mid-Term break where lower traffic levels would occur allowing the trial to bed-in with a full two weeks of normal traffic levels to follow to allow for an assessment of the impact of the trial in normal traffic conditions.

It was proposed that roadworks in the area would be suspended for the duration of the trial on both Farranshone and Clancy Strand.

Traffic counts were also proposed to be undertaken during the trial to allow a comparison with existing count information.



Note: A Traffic Management Plan will be implemented and maintained for the duration of the trial with advance warning signage on Thomond Row & High Road.

Fig 1 Details of the Trial proposal

2. Permeability Trial Proposal – Context, Design and Public Consultation Format

2.1 Context & Design

As outlined in Section 1, the TUS to City Active Travel Scheme included for a shared street along Bellfield Court (Thomond Row) and Bellfield Garden sections of the route.

Both Bellfield Court (Thomond Row) L-10078 and Bellfield Gardens L-10080 are 30kph designated residential roads and given this designation under the Jake's Law Speed Limit within housing development roads in Council charge.

While a residential road, Bellfield Gardens is being used as a route to access the city centre with traffic avoiding Thomondgate R445 and Clancy Strand L- 10085 by using this route.

The current National Cycle Manual (2011) provides guidance on the types of cycle infrastructure that is appropriate for different speed and traffic volume situations, extract below.

Bellfield Court (Thomond Row) has a recorded ADT of 3195 (2way) and a 7 day 85% speed of 38.1kph

Bellfield Gardens has a recorded ADT of 3139 (2way) and a 7 day 85% speed of 35kph

1.7.4 Guidance Graph

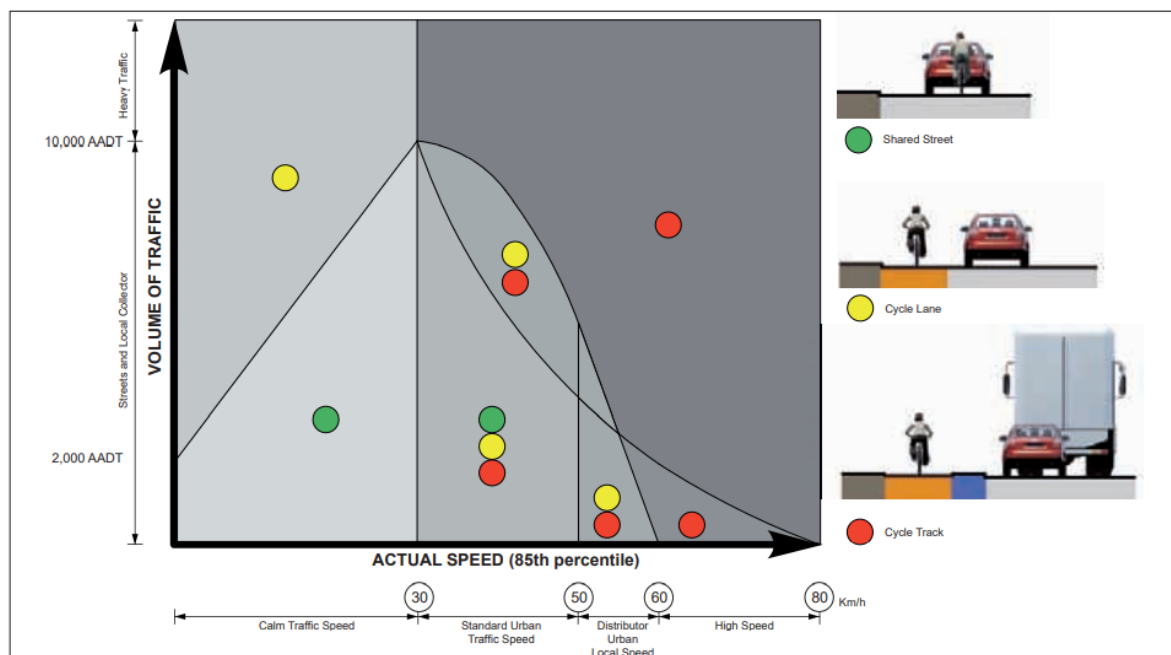


Fig 2 Extract from National Cycle Manual

From the graph it can be seen that, for both locations, a shared street, cycle lane or cycle track would be appropriate and due to the residential nature of the street, a shared street was proposed.

The National Cycle Manual recommends that designers consider the following steps in determining the appropriate cycle facility required

1. Traffic Reduction
2. Traffic Calming
3. Junction Treatment and Traffic Management
4. Redistribution of carriageway

5. Cycle lanes and cycletracks
6. Cycleway (public roads for the exclusive use of cyclists and pedestrians)

Due to the number of submissions on the Part 8 raising concerns with the proposed shared street and requesting additional consideration of filtered permeability or a one-way system to reduce the traffic on Bellfield Gardens, the Active Travel Team reviewed the suggestions made in the submissions and considered that, while the proposed scheme was compliant with the requirements of the National Cycle Manual, a reduction in traffic, if feasible, would provide improved level of service for cyclists on the route.

A number of options were reviewed and it was considered that the simplest filtered permeability proposal to advance to trial was a short-term restriction at the northern side of Bellfield Gardens.

To best inform the Part 8 process, it was proposed to undertake the trial ahead of the Council decision on the scheme (mid December 2022) and it was also considered that it would be beneficial to utilise the Mid-Term break in early November to start the trial, allowing for a short period of reduced traffic for the trial to become established ahead of a full two weeks of normal traffic.

2.2 Public Consultation Format

The Active Travel Team reviewed the trial procedures that had been utilised during Covid restrictions and also those being utilized presently by other Councils.

It was considered that a two week non-statutory public consultation was the appropriate consultation method and period for a trial. Due to the timelines, My Point facilities were utilized along with a leaflet drop to 450 houses in the locality.

While there is guidance in the NTA's Permeability Best Practice Guide, this is typically for permanent installations and not for trials.

Notwithstanding, the typical process was broadly followed by briefing councillors, preparing a brochure and undertaking an online non-statutory public consultation:

- Brief Local Councillors on the project and preliminary design – Inform Councillors of the scheme under consideration and that the community will be notified and consulted;
- Brochure & Questionnaire (Non statutory public consultation) – online survey – Local residents; ` Courtesy letter – local schools – resident organisations – local Gardaí – local businesses – community organisations– offer face to face meeting; `
- Public Meeting / Consultation Event on Key Issues – subject to outcome of Brochure & Questionnaire (not required for all projects); `
- Use of dedicated project webpages or social media; `
- Notify Local Area Committee of preliminary public consultation responses – Elected Members

The Permeability Best Practice Guide notes that public meetings can be effective as a method of exploring feedback from quantitative and qualitative assessments (leaflet drops and feedback surveys). The Guide also notes that community organisations may not be as representative as they initially claim and often information provided is not statistically robust. It also notes that meetings are best not used in isolation.

3 Public Consultation Submissions & Issues Raised

3.1 Public Consultation Submissions

A total of 391 submissions were received by the Active Travel Team through both My Point directly, emails (where they were subsequently uploaded onto MyPoint) and by letters posted to the Active Travel Team. One submission on My Point was given a reference and then subsequently withdrawn.

All submissions have been reviewed and summarised.

Of the submissions received, 39 were duplicate submissions i.e. the same content submitted twice on My Point or the same letter submitted twice by email.

In addition, there appear to be several individuals who have made submissions directly (single or multiple) and also through email route.

There are a large volume of submissions (237) opposed to the trial that were received by email through one office. These contained an attachment ("Local Resident Submission") with the same typed content individually signed.

An additional submission with the same content was submitted directly. Refer to Fig 3.2 on Summarised reasons for objection, as included.

There was some duplication in these submissions with 30 of the signed sheets being recorded more than once. In addition, 20 of these submissions were from people who had also made direct individual submissions.

There were 54 submissions made in support of the trial, 337 opposed and one submission was withdrawn.

Where available the general location of the person making a submission was considered and the following chart and heatmap indicate that the majority of submissions were from those living local to the proposed trial (heat map area shown represents 76% of total submissions received).

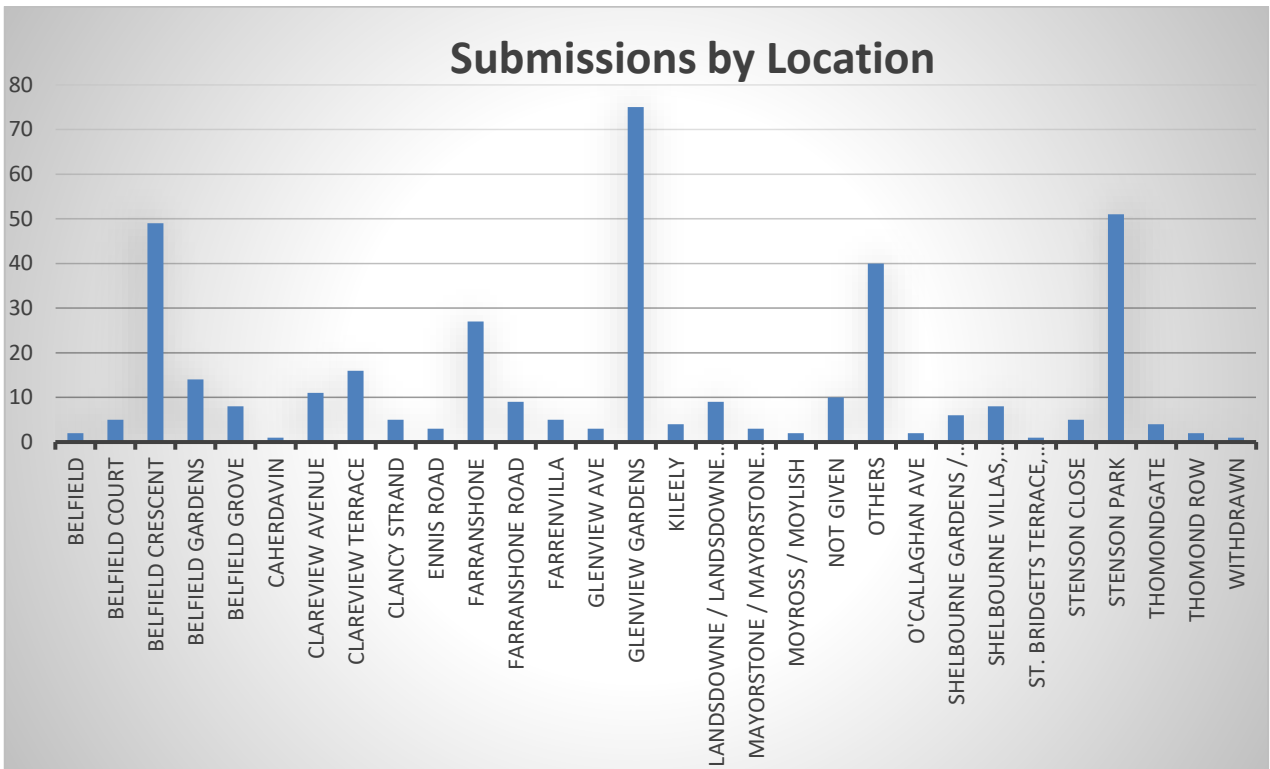


Fig 3 Submissions by Location (where known)



Fig 4 Heatmap of Local Submissions based on provided addresses

3.2 Summary of Submissions in Support

The submissions in support of the 3 week trial were reviewed and the main points were summarised.

From the generated word-cloud, it is seen that the main issues raised in the submissions supporting the trial were safety for residents, safety and amenity for children both living on the street and cycling along the street and for cyclists generally.



Many of the submissions included reference to extending the trial to a wider area and using the trial to inform future trials and design proposals locally and across the city.

Submissions were also made in support of extending the trial period. Submissions also referenced the potential for reduced traffic in Farranshone.

There were some who referenced near-miss accidents for cyclists along the route and also to the benefits of play and child-friendly mobility on streets where traffic can be reduced.

3.3 Summary of Reasons for Objections

A review of the submissions opposing the trial are as follows:

As previously noted, 237 of the submissions were in the format of “Local Resident Submission”:

We as residents of the area have numerous issues with this proposed trial that you are suggesting is to take place on 1/11/2022. This plan is ill thought out and is being forced on the residents without taking into consideration their option and how it will affect their daily lives. Residents of Glenview Avenue, Glenview Gardens, Farranshone, Clareview avenue, Belfield Grove, Belfield Crescent, Belfield Court and Stenson park will be seriously affected by this proposal.

Without the route through Belfield their access to the Ennis road and city centre is

- A. Travel up Farranshone road to Shelbourne road and Ennis road. This route is already gridlocked in the mornings so adding more traffic will add to this congestion and with all the extra traffic that this will bring on the road it will become unsafe for families who walk to the local schools and have to use this route daily.
- B. Though Glenview gardens and Stenson park taking us onto high road thomandgate where currently the traffic is heavily congested so your proposal will bring the traffic straight to the treaty stone, turning right and down Clancy strand where currently the traffic is at a stand still. We currently have traffic congestion of the Ennis road to Sarsfield bridge in addition to the traffic coming from LIT direction on high road.

The first that residents heard of this proposal from the Active Travel Team was a leaflet drop. We note that Metro North Councillors supported this proposal from Active Travel, Can we ask who gave them the mandate to support this on behalf of the residents of the area without consulting the residents to see how the plans would affect their daily lives.

We urge and request that this proposal is now halted until proper consultation and solutions are put before the people most affected and that any issues/concerns they have would be addressed. We have a lot of elderly residents living in the area who don't have access to the internet and so a public meeting should be held between the residents and Active travel team before any proposal is brought forward be it temporary or otherwise.

Summary of Issues included in “Local Resident Submission”:

- Concerns regarding impact of trial on local residential areas
- Concerns regarding impact of increased traffic on Farranshone and junction capacities at Shelbourne Road and Ennis Road including impact on those who walk to school on this route
- Concerns regarding the impact on residents having to use the Thomondgate Junction instead of Bellfield route
- Concerns regarding delays due to existing and increased traffic on routes
- Concerns regarding the leaflet content and the format of the public consultation. Request for a public meeting ahead of any proposal, temporary or otherwise

The remainder of the Individual submissions opposing the trial were for a variety of reasons and several included multiple issues, summarised below. Combined totals for the Issues raised are also included:

Issue Raised	Individual Submissions	Local Resident Submissions	Total
Would like continued access to Bellfield for local traffic.	27		27
Consideration of Impact on Farranshone Residents (safety, travel restrictions and increased traffic on their roads)	14	237	251
Concern about impact on surrounding residential area	25	237	262
Impact on journey time to work / appointments	11	237	248
Whole city in gridlock	5		5
Concerned at impact on emergency services	2		2
Difficulty Exiting onto Thomondgate and congestion on Clancy Strand	10	237	247
Concern at perceived lack of consultation and type / method of response / prior studies required	5	237	242
No reason given	5		5

Summary of Issues Raised in Submissions (Opposed)

4 Summary and Recommendation

4.1 Summary

A total of 391 submissions were received on the Public Consultation for the Bellfield Gardens Permeability Trial. There was a significant majority opposed to the trial as proposed.

Due to time constraints and the volume of submissions to be reviewed, **a decision was made not to progress the trial on 1st November 2022, as initially proposed.**

The purpose of this report is to review the submissions received to inform any future trial at this location.

On review of the submissions received during the public consultation, it was established that the vast majority of those opposed were from the larger residential block within Ennis Road to the South, Shelbourne Road to the West and High Road to the North and that the main concern was the impact on their local traffic movement and concerns regarding increased traffic within the block throughout the course of the day.

Further correspondence issued directly to Metro North Councillors from local residents, noted as representing 216 of 500 households locally (email of 26th October 2022 forwarded to Active Travel Team). This noted that the 216 households referenced have provided their consensus around the elimination of cut-through traffic on all roads in the neighbourhood and are in favour of a filtered permeability assessment for the larger residential block:

As you may be aware, the recent "Bellfield Gardens Filtered Permeability Trial" public consultation has received a significantly large amount of submissions.

It has started a debate amongst most residents in the affected residential neighbourhood between Ennis Road, Shelbourne Road, High Road, Bellfield Terrace and Bellefield Gardens.

Three broad views appear to have emerged from this:

- The TUS to City route running through my neighbourhood and serving the larger city must allow for cycling amenity of a high urban standard.
- The right of all local residents to live on a safe, cycle-able and walkable residential road is unquestionable.
- Existing motorised accessibility for local residents cannot be removed.

I have observed that the proposed trial under the scope of the TUS to City Active Travel scheme is limited, and that its purpose is not trusted by the majority of residents.

This has become divisive and polarising for my neighbourhood.

I have also observed a neighbourly consensus that we would like the elimination of motorised cut-through traffic on all roads in our neighbourhood.

I recognise that the TUS to City scheme is part of a National and City priority.

It is important to me that the boundaries of my neighbourhood, along with the affects of this intervention, is recognised.

I feel that my neighbourhood deserves its own inclusive process to achieve a good standard of permeability. This can only serve to enhance the larger city priority.

As my local representative, and with respect to the NTA Permeability Best Practice Guide, I request that you identify my neighbourhood as a candidate for Filtered Permeability, request funding for its assessment and support its prioritisation through the process.

Limerick City & County Council have tendered for consultancy services for the delivery of Phases 5-7 of the TUS to City Active Travel Scheme and a study on filtered permeability options and impacts can be included within the scope of the consultancy appointment.

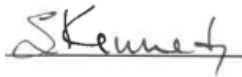
It is noted that the works proposed under the TUS to City Part 8 would not impede any future permeability proposals or trial progressing and the junction tightening and junction upgrades proposed could actually be beneficial to any future trial.

4.2 Recommendation

It is recommended that a study should be undertaken to determine the potential for wider permeability within the residential block.

Any future trial or introduction of filtered permeability would only be progressed following local consultation, with reference to the consultation process outlined in the Permeability Best Practice Guide, which may include local councillor briefings, non-statutory consultations/ surveys and meetings with local groups.

Signed:



**Sinéad Kennedy
A/Senior Executive Engineer
Active Travel Team**

Endorsed:



**Sean McGlynn
Senior Engineer
Active Travel Team**

Approved:



**Brian Kennedy
Director of Service
Transportation & Mobility Directorate**

Appendix A: Public Consultation Leaflet and Map

Appendix B: Summary of Submissions (Data File – Addresses removed)