

[REDACTED]

9 November 2022

Planning, Environment and Place Making Department
Limerick City & County Council
Dooradoyle Road
Dooradoyle
Limerick V94 WV78

BY EMAIL AND ONLINE VIA MY POINT

Dear Sirs

**Part 8 - South Circular Road (“SCR”) to City Centre
Active Travel Scheme**

Please accept this letter as our submissions in respect of the above proposed active travel scheme.

Background

We reside at [REDACTED] SCR which is opposite the former St Philomena’s Primary School. Our house is therefore located between Summerville Avenue and Laurel Hill Avenue.

We have lived at our property since August 2016. We have three children and two attend school locally. One attends Laurel Hill Coláiste and the other attends an Mhodscoil, O’Connell Avenue. Both walk to and from their respective schools.

Given the location of our house we are most impacted by Section 3 of the proposed scheme - Fennessy’s roundabout to Laurel Hill Avenue and our concern is related primarily to that part of SCR between Summerville Avenue and Laurel Hill Avenue.

We can see similar issues or concerns being had between Summerville Avenue and Fennessy’s roundabout. We are not in position to offer an informed view of the proposals as they apply to SCR between Fennessy’s roundabout and the intersection with Ballinacurra Road.

On the part of SCR between Laurel Hill Avenue and Summerville Avenue the proposal as we understand it is to:

1. remove all on-street parking bays to facilitate cycle lanes

2. construct a dedicated two-way cycle track on the western side of the SCR that is three metres wide; one northbound and the other southbound
3. remove an off-street green space and replace with a hard surfaced parking area to include 10 spaces on corner of SCR and Laurel Hill Avenue.

We feel that a shared carriageway for cyclists (and motorists) as opposed to a two-way cycle track is the only appropriate option on this part of the SCR and we object to the scheme currently proposed. We acknowledge the need for bike infrastructure however we reject the proposed scheme. We are of the view that a two-way cycle track will result in limited space for other road users and present dangers to pedestrians and those getting out of and into motor vehicles.

To summarise our Concerns/Objections are:

1. Safety Concerns
2. Loss of Amenity
3. Proposal will not meet minimum standards for pedestrians
4. Adverse Impact on Architectural Conservation Areas (“ACA”) in conflict with Limerick City and County Development Plan 2022-2028

We have expanded on these concerns below:

Safety Concerns

We believe a two-way cycle track in an area with an existing concentration of educational institutions together with two places of worship greatly increases the risk of collisions between cyclists and pedestrians and cyclists and motor vehicles. It must be remembered that cycle lanes are used not only by conventional bicycles but by motorised bicycles (favoured by fast food delivery personnel) and electric scooters (e scooters). Such motorised cycles and scooters move at the speed of conventional vehicles and can lead to an increase in accidents and injuries to other cycle lane users and pedestrians. The (UK) Department for Transport's annual report for 2021 recorded 1,434 casualties involving e scooters (up from 484 in 2020) including 10 deaths (up from 1 in 2020) and 421 people seriously injured (up from 128 in 2020). We appreciate that such accidents do not just happen in cycle lanes but the above statistics show the increased usage of such modes of transport which are not necessarily pedestrian "friendly".

The proposed scheme permits the use of e scooters and motorised bicycles immediately adjacent to a footpath heavily used by children and others which is contrary to optimum town planning principles for safe pedestrian usage. Good town planning and urban design separates cycle lanes from footpaths and road. No such real separation is proposed by this scheme.

Within our immediate vicinity are the following educational institutions/places of worship:

1. The Redemptorist Church
2. The Elevate Church (formerly St Philomena's)
3. MIC - over 5,000 students enrolled
4. St Clement's College - enrolment as at the school year 2021/2022 - 517 boys
5. Laurel Hill Secondary School - enrolment as at the school year 2021/2022 - 692 girls
6. Laurel Hill Coláiste - enrolment as at the school year 2021/2022 - 397 girls
7. Scoil Mháthair Dé - enrolment as at the school year 2021/2022 - 342 pupils
8. An Mhodhscoil - enrolment as at the school year 2021/2022 - 610 pupils
9. A private tuition centre for secondary school students which operates from the rear of The Elevate Church

Our understanding is that none of the above schools are parish schools meaning that residing within the local parish is not a criteria for admission as is the case with for example, Ard Scoil Ris. Pupils therefore attend these schools from throughout Limerick City, County and indeed Clare. In my daughter's class at an Mhodhscoil there are pupils who reside in Ardnacrusha, Castletroy, Cratloe. Walking and/or cycling to school is not a viable option for a lot of pupils.

During term time the area is extremely busy with both vehicular traffic stopping to drop off in the morning and pick up in the afternoon pupils attending these schools. Parents whose children attend an Mhodhscoil park or set down on the SCR and go to and from the school via Quin Street on foot.

We believe that if the proposals proceed:

1. Vehicles dropping off and picking up pupils from the schools will see pupils having to cross two cycle lanes. There is a risk of a collision between pedestrians and cyclists. The risk increases with younger children at the secondary schools and/or primary schools. It also increases with bad weather as visibility reduces for both cyclists and pedestrians and pedestrians tend to "rush".

None of the Reports submitted with the Part 8 application address the significant activity produced by the secondary schools during term time.

2. Pedestrians using the footpath inadvertently going onto the cycle lane. The footpaths are in high use not only by people going to and from schools or churches in the area but by people walking to and from the centre of town or walking locally for recreation etc on their own, with others, with dogs, with prams or strollers. There is the real prospect of some pedestrians (especially young or elderly) going onto the cycle lane and a resulting collision.

There is also a good deal of pedestrian traffic through pupils going to and from the secondary schools on Laurel Hill Avenue and MIC. The same applies to children walking to and from the two primary schools who are naturally accompanied by parents and often younger siblings (often in prams or on scooters).

The sports complex at St Clement's College is also utilised in the evenings and at weekends for basketball by Limerick Lions Basketball Club for underage training with more than 20 coaching sessions taking place.

The private tuition for secondary schools also operates in the evening and weekends and this increases during the school year as State examinations draw near.

Both the Redemptorist and Elevate Church are busy at the weekends and in the case of the former masses are held during the week. The Redemptorist Church does offer off street parking as does (to a lesser extent) Elevate Church but such does not lessen the traffic in the area - parishioners still travel on SCR even if they can park "off street".

Many parishioners do walk to the Redemptorist Church and like many congregations throughout the country the age profile would be considered advanced.

Within the wider community there is a very established residential owner profile (often elderly) who use the roads and footpaths as part of usual day to day living.

There is also the annual novena which takes place over a 9 day period in June with six celebrations taking place on each of the nine days (in June 2022). This event is what Fr Enright describes as the "spiritual equivalent of Thomand Park" attracting thousands of people from all over Limerick County and neighbouring counties.

If we assume half of the total MIC students attend, on average, MIC on a given weekday together with the students of the above schools there is circa 5,000 students going to and leaving this area each day. We understand on average cycle usage is currently less than 2% of the population and therefore on the above numbers there would be 100 cyclists from the student population (in the vicinity) of 5,000. Although the introduction of cycle lanes is designed to increase usage the projections are that this will not exceed 5%. The proposed scheme prioritises road usage for such small minority and takes little or no account for improving pedestrian usage which is high in such a concentrated area.

Loss of Amenity

The development is stated to include the "removal and redistribution of on-street parking bays to facilitate cycle lanes" and the "creation of 10 new parking spaces near Laurel Hill Ave".

There are currently 25 official on-street parking spaces between Summerville Avenue and Laurel Hill Avenue. All of the current SCR on-street parking will be removed from the junction of Summerville Avenue to Laurel Hill Avenue to facilitate the cycle lane. This is the only part of the SCR that will be impacted to this extent by the proposed scheme and we feel that the residents on this section of the road are being disproportionately adversely impacted.

We have reviewed the Car Parking Analysis Report prepared by Punch Consulting Engineers dated September 2022. With regard to the part of the SCR between Summerville Avenue and St. Alphonsus Street the Report states:

Existing Official Parking - 45

Surveyed overnight parking - 28

Proposed Official Parking -19

Net Loss/Gain - 26

The Proposed Official Parking includes the 10 new spaces to be provided on the corner of Laurel Hill Avenue and SCR, the 7 new spaces on Quin Street and the 2 remaining spaces off SCR.

According to the Punch Report the Net Loss of spaces would be 26 which results in a 57% reduction in loss of on-street parking for the area between Summerville Avenue and St Alphonsus Street.

The Punch Report does not fairly reflect the ongoing usage of the on-street parking. Its results are taken from a very limited timeframe and (incorrectly) implies that overnight usage of the on-street parking is not significant. That does not withstand the scrutiny of our observations in the six years we have resided in the area. We often have to advise visitors of the lack of parking in this part of SCR and that is with the current full complement of on- street parking.

We are of the view that parking on Quin Street will not be an option for residents between Summerville Avenue and Laurel Hill Avenue so this does not in our view constitute a “redistribution on on-street parking bays”. The residents on the area between Summerville Avenue and Laurel Hill Avenue will have to park in either the two spaces off SCR or in the newly created 10 car parking spaces which will be very difficult or almost rendered impossible at the school drop off and collection times.

A visitor to a property (without off street parking) on SCR near the intersection with Summerville Avenue will need to drive approximately 250/300metres to the proposed 10 spaces to be created at the corner of SCR and Laurel Hill Avenue. Even if such a visitor is fortunate enough to find one of the 10 spaces vacant they then face a 250/300metre walk back (with or without bags etc) to the relevant property. And they face a return trip on leaving the property. This cannot be fair.

Homeowners have bought properties in the area on the basis of on-street parking that is a controlled residents parking scheme. The proposed scheme seeks to take this amenity away from them and to replace with a wholly inadequate and ill thought out substitute.

Other aspects of the loss of amenity are identifiable when the following questions are asked:

How is it proposed that Waste Management and Recycling companies will access homes?

What of An Post, DPD and other courier companies who tend to deliver at times coinciding with the start of the school day? Where will they park?

Where will tradespeople/removal vans park?

What of carers coming to attend elderly residents residing on this section of the SCR?

What of emergency vehicles such as fire and rescue services?

What about elderly grandparents visiting family on SCR?

Proposal will not meet minimum standards

It is important to keep in mind that the section of the SCR between Summerville Avenue and Laurel Hill Avenue is particularly narrow. The total road width immediately outside our property is 4.85m from curb edge to curb edge - this is made up of parking bays of 2.2m from curb edge to outside edge of parking bay road markings and then 2.65m from road marking of parking bay to far curb edge.

The footpath width (west side of SCR) is 160cm from boundary wall to curb edge and the far (east side of SCR) footpath width is 150cm from curb edge to far boundary wall. Urban planning recommends footpaths be a minimum of 180cm wide. So already the footpaths can be said to be not meeting the minimum standards. Whilst we accept it is probably not viable to increase footpath widths that does not mean the Council should look to make the western footpath less safe through the introduction of a cycle lane immediately adjacent thereto or for the eastern footpath to have vehicles passing at a closer distance than already exists.

We understand that the cycle track will be 3 metres in width in accordance with the National Transport Authority's detail provided in BusConnects Preliminary Design Guidance Booklet.

Proceeding on the basis of the road being a total of 4.85 metres wide with and a 3m allowance for the cycle lane then 1.85 metres remains for vehicular traffic. The average car width in 2021 is 1.821 metres (nimblefin.co.uk). That would leave 29mm (just over an inch) of space for an average width vehicle between the cycle lane on the cycle lane side and the eastern foot path. Of course some vehicles are less than 1.821 metres wide but many vehicles are wider. It would be open to "narrow" the cycle lanes but that creates an increased risk of collision between cyclists, vehicles and pedestrians.

Adverse Impact on Architectural Conservation Area and Conflict with Limerick City and Council Development Plan 2022-2028

It is noted that the proposed scheme will pass through:

- Architectural Conservation Area ("ACA") 1 - South City Centre and Newtown Pery
- ACA 2 - South Circular Road, New Street and University of Limerick Mary Immaculate Campus

Our own property 9 Victoria Terrace is on the Record of Protected Structures and situate in ACA 2.

We believe that the proposal scheme will have a negative impact on the ACAs and conflicts with Limerick City and Council Development Plan 2022-2028.

I note that an Architectural Heritage Impact Assessment was prepared by Dr Judith Hill in August 2022. As noted by Dr Hill at Cluse 6.2 of the Assessment (Page 23):

“The failure to make adequate provision for residential car parking spaces in ACA 2 will have a potentially significant negative impact on the character of the ACA by incentivising residents to convert front gardens to parking spaces. This will involve the demolition of dwarf walls, railings and gates and reduce the design coherence of the ACA. It may also incentivise further erosion of rear garden walls to accommodate cars in back gardens. Such actions will also involve loss of natural amenity as plants are replaced by tarmac and thus an erosion of the character of the ACA 2.

This has the potential to conflict with Limerick City and County Council’s Objective EH053 in the Current Development Plan

- (a) To protect the character and special interest of an area designated as an ACA
- (b) Seek the retention of all features that contribute to the character of an ACA, including boundary walls, railings, soft landscaping, traditional paving and street furniture”.

For the reasons set out in this submission we object to this Part 8 development.

Yours sincerely,

Fiona McPhillips & Emmett Peters