Limerick Shannon Metropolitan Area Transport Strategy

Public Consultation Document

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Contents

1. Executive Summary

1.1 Introduction

The Public Consultation period on the *Draft Limerick Shannon Metropolitan Area Transport Strategy* (the draft Strategy) initially ran from the 2nd September to the 16th October but was extended until 30th October 2020. The extension reflected the difficulties presented by restrictions placed on public gatherings and travel during the Covid 19 pandemic and conflict with the consultation period on the Limerick City and County Development Plan. This time extension allowed for greater participation from stakeholders and the wider public.

This Report reflects the submissions received during the public consultation stage on the draft Strategy. 112 submissions were received in total. Each submission was received, coded and recorded by the Project Team. The Report outlines how the public consultation was managed, the number of people that interacted with the project and summarises the key issues and concerns raised in submissions.

1.2 Background

The Limerick Shannon Metropolitan Area Transport Strategy 2040 (LSMATS or the 'Strategy') has been developed by the National Transport Authority in collaboration with Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland (TII). The draft Strategy has also been informed by pre-consultation submissions from several key local stakeholders outlined in a separate Report, published alongside the first draft.

The National Planning Framework 2040 (NPF) envisages that the Limerick Shannon Metropolitan Area (LSMA) will become the growth engine of the Mid-West Region with projected growth of at least 50% in the period up to 2040. This projected population, employment and education associated with this growth brings opportunities and challenges for the development of the LSMA. The intention is that LSMATS will deliver an integrated transport network that addresses the needs of all modes of transport to support planned growth up to 2040 in a compact and sustainable manner.

The Strategy represents a coherent framework for transport infrastructure and services, around which agencies such as those involved in land use planning, environmental protection and the delivery of other infrastructure and services such as housing, utilities and community facilities can align their plans and investment priorities.

The Strategy has been developed to be scalable and flexible enough to meet changes in population, education and employment growth and is subject to periodic review every 6 years.

1.3 Consultation Publicity and Activity

Advertisements promoting the consultation were taken out in local and regional media. Several articles were published about the draft Strategy and the associated consultation process in national and local newspapers including online articles and radio.

The National Transport Authority's (NTA) website was also used to publicise the consultation. All consultation material including the Strategy, Public Consultation document and was made available to download on https://www.nationaltransport.ie/consultations/publication-of-the-draft-Limerick Shannon-metropolitan-area-transport-strategy-2/

At the official launch of the consultation on 2nd September 2020, several stakeholders and organisations were invited to attend two separate events. Attendees included the Chief Executives and Directors of both local Limerick City and County Council and Clare County Council, associated public representatives and various media outlets.

1.4 Next Steps

The publication of this Report is another milestone in the ongoing development of the Limerick- Shannon Metropolitan Area Transport Strategy 2040. The National Transport Authority has prepared a revised LSMATS

and accompanying Strategic Environmental Assessment (SEA) Environmental Report and Natura Impact Statement (NIS), which will incorporate stakeholder feedback, as appropriate.

The National Transport Authority envisage that the final Strategy will be published in the 2nd quarter of 2022.

2. Introduction

2.1 Project Background

The National Transport Authority (NTA) is a public body set up under statute and established in December 2009. The role and functions of the NTA are set out in three Acts of the Oireachtas: the Dublin Transport Authority Act 2008; the Public Transport Regulation Act 2009; and the Taxi Regulation Act 2013. In August 2015, the Department of Transport, Tourism and Sport (DTTaS) published its policy document Investing in our Transport Future – A Strategic Framework for Investment in Land Transport (SFILT). Action 4 of SFILT states that "regional transport strategies will be prepared by the NTA and provide an input to regional spatial and economic strategies". Having regard to its role in relation to transport, and the action placed upon it in SFILT, the NTA in collaboration with Limerick City and County Council and Clare County Council is developing a Transport Strategy for the Limerick Shannon Metropolitan Area (LSMA) for the period up to 2040.

DTTaS recently published an update to this policy document, Planning Land Use and Transport – Outlook 2040 (PLUTO), which is underpinned by the projections and settlement patterns identified by the National Planning Framework (NPF). The Limerick Shannon Metropolitan Area Transport Strategy 2040 (LSMATS or 'the Strategy') will align with the over-arching vision and objectives of the NPF and PLUTO and will provide a framework for the planning and delivery of transport infrastructure and services in the LSMA over the next two decades. It will also provide a planning policy framework with which other agencies can align their policies and investment.

2.2 Project Development

The methodology for the development of the draft Strategy was undertaken on a step-by-step basis, from:

- Reviewing the existing policy and baseline conditions,

- Undertaking a detailed future demand analysis based on land use projections received from both local authorities,

- Developing transport options,

- Optimisation of land-use to align with high-performing transport corridors,

- Developing the draft Strategy for public consultation; and

- Finalising the Strategy.

This Report details the consultation process undertaken by the project team during the public consultation stage on the draft Strategy and provides a summary of the feedback received during consultation. The feedback received has been reviewed by the Project Team. Themes and common issues that arose during the submission analysis stage have been documented in Chapter 7.

The NTA recognises that it is imperative for the Strategy to be developed in a collaborative and informed manner and is committed to ensuring this continues throughout the lifecycle of the Strategy and its implementation.

3. Pre-Draft Stage

3.1 Strategy Steering Group

A Strategy Steering Group (SSG) for the LSMATS was established at the outset of the project and included senior personnel involved in land use planning and transport planning from the following organisations:

- National Transport Authority (NTA).

- Limerick City and County Council (LCCC);

- Clare County Council (CCC);

- Transport Infrastructure Ireland (TII); and

This group met on a formal basis four times and there was on-going dialogue between the NTA and the two local authorities throughout the development of the LSMATS.

3.2 Key Stakeholder Engagement

34 stakeholders were identified by the Steering Group members and invited to be involved in the consultation process for the draft Strategy. Early engagement with stakeholders is an important aspect of strategic planning. The purpose of this advance consultation and engagement was to clearly communicate the intention to prepare a draft Transport Strategy, its intended scope and to seek views and opinions on issues that should be considered in its preparation.

These stakeholders were as follows:

- Bus Éireann;
- Iarnród Éireann;
- An Garda Síochána;
- An Taisce;
- Southern Regional Assembly (SRA);
- City Link;
- Clare Public Participatory Network (CPPN);
- Dublin Coach;
- Enterprise Ireland;
- Fix Limerick Bus;
- Health Service Executive (HSE);
- IDA;
- Innovate Limerick;
- IRHA;
- Irish Wheelchair Association (IWA);
- JJ Kavanagh;
- Limerick 2030;
- Limerick Chamber;
- Limerick Cycle Bus;
- Limerick Cycle Campaign;

- Limerick Institute of Technology (LIT);
- Irish Georgian Society – Limerick Chapter;
- Limerick Taxi Association;
- Local Link;
- National Council for the Blind (NCBI);
- Shannon Chamber;
- Shannon Foynes Port Company;
- Shannon Group;
- Shannon College of Hotel Management;
- Tours Operators;
- Mid-West IBEC;
- University of Limerick (UL); and
- Waterways Ireland.
- Limerick Public Participation Network (LPPN);

3.3 Strategy Steering Group Meetings

The NTA engaged extensively with the SSG members throughout the development of the draft Strategy. This engagement consisted of steering meetings, technical workshops and presentations to ensure that there was a collaborative and informed approach. The process allowed for the local authorities and TII to contribute in a meaningful way.

3.3.1 Strategy Steering Group Meeting 1 - Projections and Options

The first SSG meeting was held on 18th December 2018 at Limerick City and County Council. The meeting was chaired by Jacobs and Systra.

The three main areas of discussion during the first steering meeting were:

- Growth projections and key enablers as defined by the NPF;

- Approach to consultation and engagement; and

- Development of transport options.

It was agreed that the next key steps were:

- SSG to give feedback on transport challenges to inform Network Options workshop; and

- Summary of demand analysis to be prepared and presented to the SSG.

3.3.2 Strategy Steering Group Meeting 2 – Progress and Demand Analysis

The second SSG meeting was held on 3rd July 2019 at Limerick City and County Council. It was chaired by Jacobs and Systra.

The main areas of discussion during the second steering meeting were:

- Growth projections as defined by the NPF and agreed by LCCC, CCC and NTA;

- Idealised network;

- Corridor demand analysis; and

- Wider network considerations such as the cycle and walking networks, public realm, Park and Ride facilities and freight and delivery.

It was agreed that the next key steps were:

- SSG to give feedback on supporting documents;

- SSG to submit a list of stakeholders to include in the advance consultation process;

- Full-day workshop to be organised; and

- Network options for all modes to be developed and modelled.

3.3.3 Strategy Steering Group Meeting 3 - Network Options Workshop

The Network Options Workshop was a full-day workshop held on 23rd October 2019 at the Absolute Hotel, Sir Harry's Mall, Limerick. It was chaired by Jacobs and Systra.

The objectives of this workshop were to:

- Receive input from stakeholders to the network development;

- Critically review the network proposals at all levels and identify any gaps or opportunities;

- Understand local issues and context; and

- Provide direction on network options going forward.

The morning session took the form of a presentation providing an overview of the progress to date including the strategic transport network analysis. The afternoon session was an interactive workshop where attendees were

divided into smaller groups to critically review network proposals. This enabled SSG members to input directly into the development of these networks and helped gain consensus on the network-wide transport options. The workshop resulted in the formulation of Emerging Preferred Options and provided direction on demand management measures.

Figure 3-1: SSG Meeting 3 - Network Options Workshop on 23rd October 2019. Source: Jacobs.

Figure 3-2: SSG Meeting 3 - Network Options Workshop on 23rd October 2019. Source: Jacobs.

Figure 3-3: SSG Meeting 3 - Network Options Workshop on 23rd October 2019. Source: Jacobs.

3.4   Final Workshop

The final Strategy Steering Group meeting in advance of the draft Strategy report publication took place on 28th February 2020 at the Oakwood Hotel in Shannon. An early draft of the Strategy was sent to the Steering group in advance of the meeting and provided the main focus for the discussion.

The objectives of this workshop were to:

- Discuss objectives for the draft Strategy; and

- Discuss the main issues and projects identified in the draft Strategy.

- Identify and discuss changes to the draft Strategy;

- Outline an indicative timetable for the public consultation phase – originally planned for Q2 2020.

It was agreed that the next key steps were:

- Steering Group members to provide additional written feedback on the draft LSMATS document.

- NTA and consultants to consider feedback and amend the report based on the responses and priorities of the Steering Group members.

- Consultants to finalise the Report.

3.5   Ad-Hoc Meetings and Liaison

In addition to the formal SSG meetings listed above, there was a constant liaison, primarily between the NTA and the two local authorities, throughout the development of the LSMATS. This relationship facilitated the following:

- General project management and administration;

- Cooperation with both Local Authorities and the Southern Regional Assembly to secure an agreed land use planning datasheet to project future travel demand;

- It enabled the Strategy to be developed on an iterative basis with ongoing detailed feedback provided by all Steering Group members;

- Ensured the project remained on track due to the unavoidable delays as a result of the initial Covid-19 related shutdown in March 2020;

- It enabled alternative arrangements for the public consultation process due to the necessity to restrict movements and public gatherings as a result Covid-19 to be put in place; and

- It ensured that the objectives of the local authorities were fully taken into account at all times in the preparation of the LSMATS in an iterative manner and on an on-going basis, and that these objectives were reflected in the draft report, as appropriate.

4. Consultation Stage

4.1 Publication of draft LSMATS

The NTA published the draft *Limerick Shannon Metropolitan Transport Strategy* for public consultation on the 2nd September 2020. The public consultation initially ran from the 2nd September to the 16th October, the consultation was extended until 30thOctober to allow for greater participation from respondents to help compensate for restrictions on public gatherings and to avoid conflict with the consultation period on the Limerick City and County Development Plan.

Throughout this period members of the public, relevant respondents and interested parties were invited to share their views and opinions on the draft Strategy, its associated supporting documents, and the Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Statement.

4.2 Launch of draft LSMATS

The draft *Limerick Shannon Metropolitan Transport Strategy* was launched on 2nd September 2020 by means of virtual events for the media and for elected representatives of Limerick and Clare. Originally a launch event was planned to take place in a local public venue, but as a result of Covid-19 that was cancelled.

Three public consultation events were also planned to take place in Limerick and Clare, the dates and times are indicated in the table below, however as a result of Covid-19 these events were cancelled in order to adhere to HSE Covid-19 guidelines.

The launch received media coverage from a range of outlets including:

- RTÉ

- Live 95FM

- Clare FM

- The Limerick Leader

- The Limerick Post

- The Irish Examiner

4.2.1 Public Consultation Events

Originally three public consultation events were planned to take place in Limerick and Clare for members of the project team to meet the public to discuss the draft Strategy. As a result of Covid-19 the planned events could not take place, however the project team were still on hand to answer any questions from the public regarding the draft Strategy through a strategy phone number. The table below outlines the dates and location were the events were to take place.

Date	Location	Time
Tuesday 15 September 2020	Absolut Hotel, Limerick	1pm to 8pm
Tuesday 22 September 2020	Oakwood Hotel, Shannon	1pm to 8pm
Tuesday 29 September 2020	Greenhills Hotel, Limerick	1pm to 8pm

Table 4-1: Public Consultation Events

4.3 Publicity and Activity

The draft *Limerick Shannon Metropolitan Transport Strategy* and supporting documents were published and made available to download from the NTA's website following the consultation launch on 2nd September 2020.

Publication of the Draft Limerick Shannon Metropolitan Area Transport Strategy

Last updated: 21/09/2020

The National Transport Authority invites written submissions or observations on the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). The draft LSMATS sets out a framework for investment in transport for the Limerick Shannon Metropolitan Area for the next 20 years and includes proposals for the significant development of the cycle network and enhancement of bus services and infrastructure.

An Environmental Report has been prepared which assesses the likely effects on the environment of implementing the Draft Strategy. An Appropriate Assessment is also being carried out.

Draft Strategy

- Draft LSMATS Public Consultation Document
- Draft LSMATS Full Report
- Dréacht Stráitéis LSMATS
- LSMATS – Easy to Read
- LSMATS Word Version

Environmental Documents

- SEA Environmental Report and AA Natura Impact Statement

Background Reports

- Baseline Conditions and Policy Analysis
- Demand Analysis
- Advance Consultation
- Supporting Measures
- Transport Options Report
- Transport Modelling Assessment

Figure 4 4: Screenshot of the NTA's webpage displaying the LSMATS documents

A range of communications tools were used to generate awareness and interest throughout the consultation period. These included:

- Launch of the draft Strategy via Microsoft Teams for elected members, senior management of both local authorities, and the media;

- Advertisements in the press;

- Dedicated public information stands and Public Consultation Document at

    - Limerick City Hall, Merchants Quay, Limerick

    - Shannon Town Hall, Gort Road.

    - Clare County Council, New Road, Ennis

- Engagement through traditional and social media;

- NTA website;

- NTA Twitter account @TFLupdates;

- Direct engagement with stakeholders;

- The project phoneline; and

- A dedicated email address for submissions and for answering queries limerickshannonstrategy@nationaltransport.ie

Figure 4 5: Sample tweet from the Transport for Ireland twitter account.

4.4   Virtual Events

In addition to the launch events, the Project Team took part in a number of additional virtual events over the course of the public consultation period to publicise the draft Strategy and to enable Elected Members, stakeholders and interested members of the public to make more informed submissions. These included presentations to and detailed discussions with the following;

- Limerick City and County Council, Travel and Transportation Strategic Policy Committee (SPC), Monday 14th September.

- Public consultation event for the Limerick City and County Development Plan, Thursday 17th September

- Limerick Transport and Mobility Forum, Tuesday 22nd September

- Clare County Council, Economic Development SPC, Monday 28th September

- Clare County Council, Transportation SPC, held, Monday 28 September

- Staff and Students of the University of Limerick, Tuesday 6th October

- Limerick Chamber of Commerce, Wednesday 7th October

- Shannon Chamber of Commerce, Thursday 15th October

5.   Feedback Received

All feedback received by the project team was acknowledged and recorded. The NTA facilitated submissions and observations by post and email.

- Email: limerickshannonstrategy@nationaltransport.ie

- Post: Limerick Shannon Metropolitan Area Transport Strategy, National Transport Authority, Dun Scéine, Harcourt Lane, Dublin 2, D02 WT20; and

- Phoneline: 087 4354401.

A total of 112 submission were received, all via email. No submissions were received by post. A breakdown of these respondents is set out in Table 5-1 below.

The following chapters present the key themes that emerged during the analysis of feedback received.

Table 5 1: Breakdown of respondents by category.

Category	Number
Individuals	50
Organisations	29
Government Departments/State Agencies/Local Authorities	19
Elected Representatives	5
Political Parties	5
Education	2
Residents Associations	2
Total	112

6.   Analysis of Feedback

6.1   Introduction

This section of the Report briefly outlines the approach taken to analyse the 112 submissions received during the first non-statutory public consultation period for the draft Strategy.

6.2   Methodology

Each and every submission received has been acknowledged and reviewed in its entirety. All personal data of the individuals who made submissions is not documented within this report and is being held in accordance with GDPR 2018. Following a review of the feedback received, the key themes which emerged are as follows:

- Vision and Ambition;

- Covid-19;

- Environment and Climate Change;

- Mode Share and Phasing;

- Modelling Process;

- Social Inclusion;

- Accessibility;

- Travel to Schools; and

- Consultation and Engagement.

The following topics are also discussed in the report; Policy, Existing Transport, Land Use, Walking, Cycling, Bus Network, Parking, Roads and Streets, Freight, Delivery and Servicing, Supporting Measures, Funding and Strategy Outcomes.

The following chapters form an analysis of feedback including direct quotes from submissions, while others are a summary of similar issues raised by a number of respondents. The views contained in these sections do not necessarily reflect the views of the National Transport Authority but represent the views of the respondents and members of the public who made submissions as part of the consultation process. Some feedback may be relevant to several themes and may therefore be addressed under several headings. Some submissions included comments on the specific details of individual projects which are subject to individual consultation exercises and subject to their own planning process. As such, these submissions will be reflected in this report insofar as they referred to the strategic issues related to those projects rather than the site or scheme specific details, which are most appropriately dealt with at the project level.

6.3   Submissions Overview

The following tables and figures present the results of the overall analysis of the 112 submissions received during the public consultation period. Table 6-1 and Figure 6-1 outlines the themes/categories that were mentioned most frequently. Figure 6-2 outlines all the themes mentioned in the submissions received.

A 'mention' does not imply whether a comment was positive or negative or to what extent it was discussed in a submission.

Table 6 1: Most frequent mentions by category.

Most Frequent Mentions (by Category)	
Consultation and Engagement	44%
Mode Share and Phasing	38%
Vision and Ambition	36%
Modelling	31%
Social Inclusion	24%
Environment and Climate Change	21%
Accessibility	18%
Covid-19	15%
Travel to Schools	11%

7. Post-Consultation Stakeholder Engagement

7.1 Overview

In early 2021, the NTA made a decision to seek consultation with the elected members of Limerick City and County Council and Clare County Council in order to discuss the feedback received on the original draft LSMATS and to set out the approach to its finalisation via a second round of public consultation. Additionally, the NTA met with the Chambers of Commerce for Limerick and Shannon and the Limerick Transport Forum, as well as representatives of the Tipperary County Council executive. These engagements were as follows:

1. 16th February – Limerick Travel and Transportation Strategic Policy Committee (SPC);

2. 24th February – Clare Physical Development SPC;

3. 25th February – Tipperary County Council Executive;

4. 26th February – Limerick Chamber of Commerce;

5. 2nd March – Limerick Transport Forum; and

6. 18th March – Shannon Chamber of Commerce.

Using this approach, the NTA explained in more detail the rationale for the original draft report and the general extent to which changes would be made. It was also agreed that a second round of consultation would occur once the work was complete. The main elements of the discussions were as follows:

- Main Issues Raised in Public Consultation;

- NTA Response and Proposed Changes; and

- Next Steps

In these discussions, Council members and stakeholders were in a position to elaborate upon their submissions, talk in greater detail about the issues raised, and the NTA were in a position to respond and agree any actions in relation to the report which arose. This level and detail of engagement has been very useful for the NTA in completing the revised draft.

8.   The Critical Issues Raised

It was immediately apparent from the outset of the consultation process that a number of overarching issues were emerging with the draft LSMATS. Some were fundamental in nature and require a comprehensive response from the NTA in terms of the content of a revised LSMATS. Many others were based on a lack of clarity as to the role of the NTA and the LSMATS itself in the planning hierarchy. This section sets out the nature of these submissions and the response of the NTA to each one. The rest of the report summarises the more detailed issues and is presented approximately according to the structure of the draft LSMATS report.

8.1   Vision and Ambition

Some respondents commented on the importance of a robust ambitious strategy. One respondent noted 'Limerick is Ireland's third-biggest city, it's incredibly ambitious and is growing quickly. It needs a transport strategy to match.' Another added 'the projected increases in future demand for transport, as well as the associated pressure that is mounting on limited road capacities highlight the importance of drafting an ambitious Transport Strategy for Limerick.'

The Irish Georgian Society commented 'we believe the current draft of this document lacks integrity and credibility, does nothing for Limerick in 2020 and will struggle to deliver for Limerick and the Shannon region over the next twenty years. LSMATS is the oversight document that establishes the transport ambition in the region for the years ahead. This strategy document will be a reference point for active travel planning in the region until 2040 and we cannot stand over the abject lack of care and attention given to such a task when transport impacts so heavily on every facet of our society.'

LSMATS outlined a set of principles and a vision, a number of respondents commented on these principles and vision throughout their submissions.

One respondent noted, 'we do not expect the NTA to deliver a plan to revitalise the city, but we do expect the NTA to inform themselves on the issues and know the effects of their transport proposals. We have seen the negative impact of transport led design in the past…let us not perpetuate the mistakes of the past and recognise that a thriving city should be the overarching aim of the strategy.'

It was noted in one submission that, 'the Strategy presents an opportunity to develop the foundation, and begin the implementation, of a sustainable integrated transport system. This transport system, and the connectivity it brings, will be essential to enhance the national objective of balanced regional development.'

One stakeholder mentioned 'while the overall goals for transportation and climate protection seem laudatory, it is difficult for me to see these goals expressed in the actual plan. While there are a number of improvements that could be made in the design, layout, and flow of various routes in and around Limerick City, the primary focus in the past and in this current document seem to be centred around private transportation.'

University of Limerick stated they acknowledge and support the vision outlined in LSMATS and generally support the guiding objectives but noted 'there needs to be an additional objective which gives priority to proposed land use areas that are recognised as key enablers in the National Planning Framework and which are mentioned as important in the guiding principles.'

Limerick Cycling Campaign discussed in their submission that, 'the current draft of this document lacks integrity and credibility and will struggle to deliver for Limerick and the Shannon region over the next 20 years. LSMATS is the oversight document that establishes the transport ambition in the region for the years ahead. This strategy document will be a reference point for active travel planning in the region until 2040 and we cannot stand over the abject lack of care and attention given to such a task, when transport impacts so heavily on every facet of our society. This unanimous support for a more ambitious strategy represents Limerick's appetite to be a leading progressive city in the area of mobility and sustainability.'

Limerick Chamber outlined concerns that the draft LSMATS cannot support Limerick's social and economic progress by failing to 'identify how the new transport system that it proposes will support an overarching vision for Limerick's future economic and social development' and 'explicitly identify how the transport strategy will support vital social concepts such as inclusion, accessibility, and wellbeing.'

Cllr. Secas noted 'the strategy needs to clearly outline the mechanisms that will lead to an efficient public transport system and that will ensure much more efficient commuting times and reliable public transport.'

A business organisation noted in relation to Objective WK1, that 'it is considered that the upgrade in the quality of the pedestrian environment, including walking and cycling facilities in Limerick City Centre should be prioritised, as well as improvements in transport connections to allow for multi-modal travel between key locations such as Limerick City Centre, University of Limerick, Limerick Institute of Technology and tourist attractions such as King John's Castle. In addition to this, key tourist attractions outside of the City region, such as Bunratty Castle and Folk Gardens which is a key driver of the local economy and is located between Limerick City and Shannon Town, must be supported by appropriate transport infrastructure, in turn protecting its function as a key attraction and a major contributor to the local economy into the future.'

An organisation noted that LSMATS does not align with or is in conflict with eight of the ten National Strategic Outcomes.

One respondent noted 'a high-level vision for the future of Limerick must be a guiding principle of the transport strategy, where public health, transport inclusion, place-making, heritage protection and liveability form key areas for discussion and consultation.'

A submission also stated 'it is very disappointing that such a critical strategy makes little reference to how it intends to respond to needs for sustainability, social equity and environmental quality and health needs, balanced with economic viability. How will this strategy make it a better place to live for its citizens – especially those currently experiencing transport poverty, those with disabilities and mobility issues.'

Another stakeholder commented 'the draft LSMATS takes as given that future transport trends will continue into the coming decades and plans accordingly. This approach ignores our responsibility to meaningfully shape how we do transport locally. It does nothing to enable the people of Limerick and Clare to move towards more sustainable modes of transport.'

A submission noted 'for us, this transport document had the potential to influence in a pivotal way the emerging development plan for Limerick. In our view, as currently drafted, it is failing in that. For that and other reasons set in this letter, it is critical that it is amended so that the outcome of all of the converging draft policies at play is a new ambitious, sustainable, affordable, inclusive, community focused and prosperous Limerick.'

8.1.1 Response – Vision and Ambition

In relation to the ambition shown, the LSMATS comprises the transport response to the overarching policies of national and regional government. It has also been prepared in full compliance with the objectives of the two local authorities as set down in their development plans, and as have emerged through the LSMATS process and are likely to form part of new development plans, due to their requirement to be consistent with national and regional plans. The land use plans and population forecasts determine the demand for travel, and the NTA does not have the authority to change these.

The NTA is therefore satisfied, in general, that the transport networks and services proposed in the draft LSMATS reflect the ambitions of national, regional and local government by providing the appropriate level of investment to serve the future demand for travel arising from the future land use, population and employment growth scenarios provided in those guiding plans. Notwithstanding this, some further analysis has been undertaken to address these concerns, as they relate to rail investment in particular, and to ensure that any potential changes to that ambition in the long term, including beyond 2040, are reflected in a revised draft. A new vision for the LSMATS has been developed; pillars for the LSMATS have been inserted to provide a clear message as to the basis for the strategy in order to compliment the transport objectives.

The draft LSMATS set out for the first time a realistic, viable and affordable framework which will help deliver a transformed transport culture in the LSMA. By providing for a step-change in the quality of the public transport and cycle network in particular, the NTA is providing the framework for the local authorities and other stakeholders to realise this ambition on the ground. The LSMATS provides for alternatives to car-dependency across the LSMA; a zero-emissions transport system and an unprecedented shift towards cycling. This is given greater expression in the revised strategy report.

8.2 Covid-19

Several respondents commented on the impact of Covid-19 and the need for the draft Strategy. Topics covered included the impact to travel patterns, impact to businesses, reassessing the strategy and documents considering the pandemic, and impact to transport.

Some respondents commented on changes to travel patterns due to the pandemic. Better Ennis commented 'the impact of Covid-19 on mobility patterns and remote working from rural and village communities need to be included in the LSMATS. With a Town Centre First approach included in the Programme for Government, the roll-out of broadband, and the development of community hubs, the potential new mobility patterns should be identified and included in the revised targets for a modal shift in a redraft of the LSMATS.' A resident's association commented 'there is now no longer a demand for additional car parking in UL and the community is in favour of public transport options including buses, cycleways, and rail options.' In addition, IBEC noted 'it is crucial that the transport strategy supports the revitalisation and future growth of the city centre, to create economic and employment opportunities, post Covid-19.'

Many respondents commented on the impact on businesses and the resulting changes to daily travel. IBEC noted, 'much has happened to the commuting patterns since last March. There is a degree of uncertainty over the short to the medium impact of remote working on those patterns' and this stakeholder 'believes it is necessary to take the long-term view on strategic transport infrastructure.'

Limerick Chamber commented 'the widespread adoption of remote working practices during the pandemic has resulted in a decrease in the number of individuals travelling to/from work. Increased levels of remote working will likely remain in a post-pandemic environment and this should be factored into any long-term strategy that seeks to support the needs of the regional economy. Furthermore, Covid-19 will likely have a permanent impact on the travel habits of many individuals with some preferring to use single occupant transport methods rather than public transport. It is crucial that this behavioural shift does not result in an increase in private car usage and instead is reflected in an increase in cycling/walking.' Another respondent commented 'have you people even considered the ongoing consequences of Covid-19 over the next decade in terms of the planning of how to deal with it during this time. You people would appear to believe post Covid-19... people's attitudes will return to normal as we have known it in the past... It is not going to happen for at least 10 years if we are lucky. In the meantime, people's attitudes will have changed forever and the old normal will have disappeared forever.'

Many respondents commented on the strategy and accompanying documents and their validity after the Covid-19 pandemic. Better Ennis stated that they are 'calling for a thorough review of LSMATS to redraft a much more ambitious plan to align with the RSES as viewed through the prism of the global shock of the Covid-19 pandemic.' Another stakeholder commented 'the various background papers to the overall plan include studies of demand, all of which predate the Covid-19 pandemic and cannot, therefore, take into account any long-term changes it will bring.'

Liveable Limerick noted 'after years of under-investment, Limerick needs to start making improvements right away and build momentum for further change. Progress in the last number of years needs to be speeded up. Covid-19 adjustments to how we live to demand this and have also made this more feasible having accelerated behavioural changes faster than might have been expected.'

Many respondents commented on the impact Covid-19 has had on public transport, 'as a result of the Covid-19 epidemic, there is reduced capacity on all public transport. Therefore, it is a matter of urgency that all primary cycle routes outlined in LSMATS be implemented in the next 12 months.' Another commented 'following the outbreak of the Covid-19 pandemic this year, all traffic and economic projections relating to the road previously completed are now obsolete.'

Better Ennis noted that due to Covid-19 and the impact this had on the aviation industry, more attention should be paid to 'ferry, rail, Greenway and Blueway connections to develop Sustainable Tourism offerings in the Mid-West.'

8.2.1 Response - Covid-19

A new section outlining the potential long-term impact of Covid-19 has been inserted into the revised LSMATS, and the Modelling report sets out the outcome of the assessment of the strategy against an alternative scenario where demand for travel is reduced due to increased working from home; online retailing; and remote education.

8.3 Environment and Climate Change

Many respondents discussed the climate emergency Ireland is facing and the impacts the transport system has on the environment.

The Environmental Protection Agency (EPA) noted 'we welcome that the Strategy seeks to support the transition to more sustainable modes of transport within the Limerick Shannon Metropolitan Area and this is

clearly reflected in the Guiding Principles and the proposed Strategy Outcomes. The Strategy recognises the need for better integrated transport and land-use planning and includes provisions for extensions to public transport, park-and-ride facilities, walking and cycling infrastructure, moving to low emission buses etc. These commitments, while welcome, could be strengthened by including measurable targets and timeframes for delivery, urgent and accelerated action and investment is needed to decarbonise transport and transition to more sustainable transport modes, as well as to adapt to the effects of climate change.'

The EPA also noted LSMATS 'should consider the exposure and vulnerability to weather and climate events, and the range of projected scenarios and changes to these scenarios due to climate change. Consideration should also be given to other impacts in addition to flooding. This includes more extreme temperatures, soil erosion/landslides, coastal erosion, etc., which have potential to impact on transport systems. The potential for co-benefits (for example, positive impacts on air quality, biodiversity, noise, etc.) and the potential for mal-adaptation should also be considered.' They added the strategy's 'focus on promoting sustainable modes of transport should contribute to reducing transport-related air pollution within the Limerick Shannon Metropolitan Area. In implementing the Strategy, its impacts on air quality should be monitored and evaluated as part of the SEA monitoring.'

The Irish Cycling Advocacy Network stated, this strategy is based on increasing transport emissions until 2040. There are no targets for reduced emissions or sufficiently specific plans for how to reduce transport emissions. There was no process for carbon proofing this strategy on a systematic basis, to pivot to a near zero carbon investment strategy. In short, this strategy is not climate action plan compliant. We are asking that LSMATS clearly sets out year-on-year targets on how it will align with the deliverables as set out in the Climate Action Plan, the Programme for Government and our international carbon reduction commitments.'

A main theme throughout the submissions was the lack of alignment with the Climate Action Plan 2019. Respondents called for LSMATS to include targets or performance indicators for the reduction in greenhouse gas emissions, increasing public transport journeys, provision of plans on how to reduce transport emissions and provision for carbon proofing.

One respondent commented that 'the strategy needs to have time bound targets for carbon emissions and a framework to ensure those targets are met. An implementation plan to ensure that the appropriate measures are put in place and the targets are being met. The plan must be adaptive and able to react to contingencies which put the target achievements at risk. The Climate Action Plan will be updated annually and the transport strategy or its implementation plan should likewise be monitored and updated annually.'

Several respondents commented on transport being a significant contributor to Ireland's carbon footprint, one stakeholder mentioned 'the LSMATS Transport Modelling Assessment Report shows that implementing the strategy will not decrease carbon emissions compared to doing nothing. This means carbon emissions will rise as transport demand rises.'

A submission noted that there is no reference to the 2020 Programme for Government (PFG) goal to reduce greenhouse gas emissions in LSMATS.

Limerick Pedestrian Network noted 'the current draft of LSMATS does not sufficiently target modal shift toward non-carbon-based transport solutions, and thus cannot be in alignment with the PFG or CAP.'

The EPA suggested that the LSMATS should link to the UN Agenda 2030 for Sustainable Development and the related Sustainable Development Goals. They added 'reference could be made to the transport-related goals and targets set out in Ireland's National SDG Implementation Plan 2018-2020. This would help to frame the Strategy within the context of the wider sustainable development agenda.' They also noted 'the Climate Action Plan 2019 and the Draft National Energy and Climate Plan are key elements of the national effort to deliver on Ireland's climate change commitments. Relevant aspects of these plans should be considered and integrated into the Strategy as appropriate.'

The Irish Georgian Society detailed in their submission the Climate Action Charter for Local Authorities with one of the objectives being to deliver a 50% improvement in energy efficiency by 2030. They noted 'it is clear that the LSMATS does not provide any clear pathway to achieving the goals of our local authority has pledged to uphold.'

Many submissions included suggestions on how the strategy could be improved in terms of environmental impacts. One respondent noted, 'the need to develop and roll out the infrastructure necessary to support the uptake of electric cars and alternative fuels merits attention in the strategy.' They added, 'this could include, for

example, commitments on providing charging points at park-and-ride facilities to support the required increased uptake of electric vehicles while also helping reduce congestion in Limerick and Shannon.'

Several submissions outlined the increase in noise pollution and the impacts to health and quality of life and wellbeing as a result of transport. One submission asked for the strategy to consider 'any relevant local authority noise maps and Noise Action Plans over the lifetime of the Strategy. Strategic noise maps are designed to assess noise exposure resulting from major roads, railways and airports. Noise Action Plans are designed to act as a means of managing environmental noise through land use planning, traffic management and control of noise sources.'

It was suggested that the final LSMATS should include a separate chapter on 'Environmental Considerations' and all mitigation measures and recommendations arising from the SEA should be incorporated fully. The EPA noted the NPWS are currently preparing an update to the EU National Biodiversity Plan and added 'once published, any relevant recommendations should be incorporated into the Strategy or reviews of the Strategy during its implementation. Various other plans and frameworks such as the Draft River Basin Management, Flood Risk Management Guidelines, SEA-related monitoring on environmental performance, and the State of the Environment were discussed in submissions and it was suggested issues and challenges within these plans be identified in the final strategy.

Regarding biodiversity, it was noted that 'Shannon has a significant environmental resource, any development proposals with potential for likely significant adverse effects need to be carefully considered, planned and designed. In addition, any proposals should also be subjected to the relevant environmental assessments under the Habitats, Birds and EIA Directives.'

Quietways were welcomed in the strategy. An individual noted 'we welcome making SCR a "quietway" to Limerick city centre. The width of the road is not suited to the large volumes of traffic passing through it, it causes noise and air pollution, and is unsafe for children and the elderly in particular. Many motorists currently use this residential area as a "rat run."'

In relation to the proposed Limerick Northern Distributor Road, one submission disagreed with the proposal noting that the road is across from the principal floodplains of the River Shannon and stated 'this specific floodplain is regarded by ecologists as being one of unique importance. Following the construction of the Shannon Scheme, the volume of water on this stretch of the river was drastically reduced as the surplus water was diverted for the generation of electricity at Ardnacrusha. In the intervening years a unique landscape has developed, with an enormously rich and diverse ecology.' They added 'that planning authorities should be extremely reluctant to allow any interference to a most important floodplain that works efficiently as a flood attenuation measure for the River Shannon. If we avoid interfering with a river system that works well, we will avoid incurring future significant remedial costs as many of our European neighbours have learnt to their cost.'

It was suggested that 'the development and support of routes that meet the broader public need from the Shannon International Airport which are then supported by "inward-focussed" transport routes to the airport and surrounding regions are therefore critical from a sustainability and climate perspective. The challenge in the development and implementation of LSMATS will be to realise and support services/routes that promote this more sustainable set of services.'

Regarding built heritage, the Irish Georgian Society stated, 'we have grave concerns on how the proposed transport corridor will negatively impact on built heritage and public space in the historic city centre. Decisions around transport since the 1990's have had a massive negative impact on the city and this is being felt by businesses which have been struggling, many shutting down long before Covid-19.'

Adding to this, one respondent noted 'this document does not seem to envisage a Limerick with world class heritage residential neighbourhoods – medieval and Georgian – to be protected and cherished. It does not use the transport options as a way to showcase one of the most impressive riverfronts in Europe. An ambitious cycle plan might have prioritised this rather than try to squeeze walking, cycling and buses on one of Limerick's most picturesque bridges…instead the suggested network continues to use the historic centre as a shortcut route for cars and buses carrying people from one side to another.'

Environmental impacts to Limerick city as a result of some proposals was outlined in submissions, such as historical caves and city streets. The submission noted, 'the lack of thought in the strategy for such considerations could not be brought home better than by the political representation of the Crescent in the document not as a desirable residential park but as a bus corridor with trees inserted with root system which are destined to ruin the historic caves spanning the space underneath.'

The Department of Culture, Heritage and the Gaeltacht outlined obligations set out in various Environmental Regulations. They also commented on the SEA Environmental Report, stating 'impacts to biodiversity, including impacts to sites protected by national legislation are avoided.' Their submission discussed consideration of alternatives and the Preferred Strategy and noted 'it appears therefore that the Strategy has identified that there will be negative impacts to designated nature conservation sites including European sites and to species protected by law…The Department considers based on the information presented mitigation measures have not been proposed which will effectively mitigate the significant negative impacts to biodiversity, including impacts to sites and species protected by law, identified in the SEA.' The Department added that 'the information presented indicates that the Draft Strategy may well result in significant negative impacts to biodiversity.' They also added that the 'Draft Strategy must be revised to ensure that its implementation will not result in significant negative impacts to biodiversity.' Regarding the NIS, the Department stated that it presents assessment outcomes which are not evidenced based. They stated, 'The Department advises that the necessary scientific assessments must be undertaken as part of the Appropriate Assessment to be undertaken by the NTA in this case. The NIS does not in the Department's view provide a basis for such an assessment and does not provide a basis for a conclusion that the Draft LSMATS will not adversely affect the integrity of a European site or sites individually or in-combination with other plans and projects.'

8.3.1   Response – Environment and Climate Change

The draft LSMATS sets out a framework for a transformed transport culture in the LSMA and provides the necessary infrastructure and services to significantly reduce car dependency. The NTA has considered the suggestions that the LSMATS is not compliant with overarching environmental policies or climate change objectives, and the revised report and additional appraisal has clarified this.

In summary, the LSMATS provides the appropriate framework for investment in public transport, walking and cycling to deliver the reduction in emissions required by 2030 and for a continued reduction to 2040. As such, it is fully compliant with all overarching policies related to climate change and emissions. This is given greater expression in a new standalone chapter directly addressing the 2021 Climate Action Plan obligations.

The NTA notes the findings of the Development Applications Unit in the Department of Culture, Heritage and the Gaeltacht in relation to the conclusions of the Natura Impact Statement (NIS) and have engaged with this agency to agree an approach to addressing these issues. As a result, the mitigation measures have been strengthened and the strategy report, SEA and NIS updated accordingly.

In relation to the impact of individual schemes on the environment, project-level assessments will be carried out in each case, including where applicable, Environmental Impact Assessments and Appropriate Assessments.

8.4   Mode Share and Phasing Targets

Tiernan Properties warned of restrictions against car travel, 'we note the timeframe for implementation of the many facets of the strategy and caution against placing barriers to car-borne travel in the short term.'

Some respondents mentioned the importance of targets. Southern Regional Assembly commented that targets will 'inform the statutory requirement for the RSES/MASP to prepare a progress report every 2 years to the National Oversight and Audit Commission. This will set out the progress made in the implementation of regional and metropolitan level objectives.' In addition, the Irish Cycling Advocacy Network commented, 'LSMATS in its current guise has no targets. Without targets, how is success or failure measured? It makes it difficult to suitably direct resources efficiently and applies oversight to monitor delivery. The proposed implementation table is inadequate.'

Limerick Cycling Campaign commented 'the addition of clearly defined key performance indicators KPIs that are aligned with project objectives will help focus efforts on choosing the correct methods that will deliver results.' One respondent added, 'I have serious reservations about the current draft LSMATS plan, it's lack of vision, it's an absence of adequate targets or KPIs, it's non-existent public engagement during the consultation period, the absence of climate breakdown mitigation requirements from both the Programme for Government and the Climate Action Plan, and it's the inability to properly understand transport issues Limerick faces in 2020 or have a clear plan on how to develop transport to get us to 2040.' The same individual added that a full plan for active travel for education must be delivered in the next five years. Regular meetings with respondents should be held to ensure that the plans are suitable.

Limerick Chamber noted that LSMATS failed to identity targets beyond delivery and asked for a detailed timeline of the short-term implementation strategy. The Labour Party noted 'the plan needs to be comprehensively redrafted given the substantive issues that exist concerning modelling, modal shift and the

unambitious nature of the plan.' A respondent added that they felt the strategy lacked defined targets as this instils no incentive to deliver both short-term and long-term goals. They added, 'while there is to be an implementation plan to 2040, for the strategy to succeed, it requires clearly defined and achievable Key Performance Indicators at regular intervals with the appropriate resources to deliver on objectives and to ensure the progression of the strategy at every level.' One individual asked for LSMATS to 'include a yearly breakdown of journeys by public transport vs car vs bike for the duration of this plan, milestones are considered a basic necessity in planning. From reading LSMATS, the only tangible targets that will have any impact on day to day transport do not come into effect until 2031.'

Some respondents suggested that LSMATS should have more ambitious targets for modal shift initiatives. The Southern Regional Assembly noted National Smarter Travel (2009-2020) had enthusiastic targets, 'LSMATS targets and outcomes to 2040 appear understated by comparison despite having a 20-year further time horizon.' The Southern Regional Assembly asked LSMATS to review their targets to encourage 'a higher level of ambition in outcomes/targets to achieve a reduction in a private car, increase in public transport, walking and cycling by 2040 compared to 2016 baseline performance.' Limerick Chamber also commented, 'Identify targets or commit to the delivery of targeted action plans across key areas, in particular relating to the role that respondents will play in influencing behavioural change.'

The Irish Cycling Advocacy Network commented on the inadequate timeline proposed, 'there are no significant projects scheduled for completion in the city within the next 10 years. Almost all projects are scheduled to take 20 years to complete.' They noted that the strategy required clear key performance indicators KPIs, in line with the project objectives to deliver results. Additionally, the Irish Cycling Advocacy Network stated that the targets should alight with the reviews conducted every two years for the duration of the works.

Some respondents commented on Limerick and raised concerns about its future. Fine Gael Councillors of Limerick City commented, 'this strategy document will have a very significant impact on the future of Limerick, and it is clear to us the complete lack of ambition shown by the NTA in this draft.' Limerick Cycling Campaign also commented 'our main concerns lie around the strategy's lack of commitment on delivery and how it fails to encapsulate a desired future vision for Limerick city. There is an over-emphasis on out of date modelling in defining our future, this will not lead us away from the mistakes and neglect of the past.' Limerick Cycling Campaign also noted that targets should be set for any indicators of delivery on defined objectives including, infrastructure delivery, modal shift, health and inclusion, and carbon mitigation targets.

An organisation stated 'this document reads on a basis that you are either a walker, cyclist, bus user, rail user or a driver and all competing for limited resources rather than synergising resources to benefit all transport users. We believe that this leads to a bias in favour of door to door car journeys given the distributed nature of the population settlements projected in the plan. The reality in cities where public transport plays a larger role is that a journey is often a combination of a number of modes of transport.' They added, 'building on the use of new modes of transport for local trips and combined with other models to cross the city could have generated we believe a much more significant use of public transport.'

Limerick Cycling Campaign noted 'transport modal share should be agreed in line with environmental, climate, public health and local development policy and set as an overhaul strategy.' They added, 'LSMATS is key to meaningfully achieving modal shift in our city, supporting a city core that's on its knees due to what the strategy correctly refers to as a legacy of car dependency, which has contributed to a wide range of economic, environmental and social issues including longer commutes, declining urban centres, poor public health, reduced air quality and noise pollution….89% of journeys begin and end within Limerick City and Suburbs. Considering the city and suburbs has a radius of between 5km and 8km many of these journeys offer an opportunity for a modal shift toward sustainable and active transport modes.'

Respondents suggested reducing the modal share of private car travel and noted 'modal shift from transport by private care in Metropolitan hinterland, all journeys begin and end by walking which can link all modes of transport and expand attractive public transport.'

A developer in the region noted, 'together these infrastructure proposals would greatly improve the chances of changing the modal split of future residents in the area.'

Stronger performance should be encouraged and pursued, especially to maximise the active and public transport infrastructure investment through LSMATS and support targeted actions within projects and lower tiered plans for maximum modal change outcomes. The Strategy Outcomes infographic shows the 2040 peak modal share for private car to be 51.8% of journeys by 2040 (reduced from 61.1% in 2016). This infographic also shows that between 2016 to 2040 the mode share of walking will increase from 28.9 to 31%, public transport will increase from 7.9 to 13%, and cycling will increase from 2.1 to 4.2%."

8.4.1 Response - Mode Share and Phasing Targets

Based on the submissions received, and on the NTA's close collaboration with the local authorities and the Office of the Planning Regulator in the past year nationally in relation to Development Plans and sustainable transport indicators, we are in a position to put in mode share targets for walking and cycling in the revised LSMATS. With regard to car and public transport, the NTA is cooperating with the Department of Transport on assessing national targets as part of a Demand Management study and is awaiting the outcome of this analysis prior to devising targets for the LSMA for these modes.

In relation to issues around the implementation programme, the NTA are of the view that it is not appropriate to go into precise detail in a high-level strategic plan, the function of which is to provide a 20-year framework. The revised draft LSMATS instead refers to implementation plans and programmes which follow the LSMATS, such as BusConnects Limerick and the Active Travel programmes for investment in walking and cycling infrastructure, which will provide appropriate details on delivery.

It should be noted that the NTA is in the process of implementing some of the measures contained in the LSMATS already, such as bus service enhancements and a number of cycle schemes in Limerick.

8.5 Modelling

One of the main themes to arise from feedback was criticism of the transport modelling featured in the draft LSMATS. A number of organisations included a detailed critique of the modelling used. A summary of some of the issues raised is outlined in the following section.

Limerick Cycle Campaign, Limerick Pedestrian Network, Limerick Cycle Bus and the Limerick Chapter of the Irish Georgian Society wrote a joint letter to Minister Ryan outlining their dissatisfaction with the draft LSMATS. In the letter they noted, 'the transport strategy is based on the assumption that most people will have cars and will use them to travel. It assumes that bikes are slower than cars even for short journeys and it assumes that bus lanes will not reduce the space for cars on the road. The model assumes that there will be too few passenger numbers for light rail as most people will be driving.' They also suggested that 'LSMATS Transport Modelling Assessment Report shows that implementing the strategy will not decrease carbon emissions compared to doing nothing. That means carbon emissions will rise as transport demand rises.'

A submission suggested that 'we need to move away from the "predict and provide" models, and we need to ask different questions and work towards the most desirable future rather than a projected one. We need a strategy that asks the people directly what would facilitate modal shift, rather than assuming certain actions will.' They continued by suggesting facilitating this 'through backcasting…we are at a point where we need serious creativity, inclusivity and vision in developing a strategy. Focussing on desired outcomes may help overcome bias as policy makers are elevated above the noise of current trends.' The submission added 'the LSMATS needs to be re-thought and different approaches applied. Other approaches have been used in transport planning, all include highly engaged and detailed consultations throughout the process, rather than at the end.'

Limerick Cycling Campaign noted 'there is an over emphasis on out of date modelling in defining our future, this will not lead us away from the mistakes and neglect of the past.' They added, 'this is a process led document rather than a vision led document. It relies heavily on a data model to predict the future car-based transport demand. We have assessed the modelling and found it to be of poor quality, it is based on many assumptions while utilising out of date data. Future modelling should refine the options for meeting transport demand while meeting our carbon reduction commitments, including growth trends in Micro-mobility (electric bikes and scooters). The modelling should play a supporting role in the overall transport vision, it should not define the vision.' They also stated 'transport modal share targets should be agreed in line with the environmental, climate, public health and local development policy and set as an overhauled strategy i.e. we should decide what type of city we want and then decide how we get there. A modelling process can then inform the strategy of what provisions would be required to meet those targets. This model ignores climate change targets and public health ambitions and aims to maintain the car-based transport system we currently have.' They added 'the LSMATS Transport Modelling Assessment Report shows that implementing the strategy will not decrease carbon emissions compared to doing nothing. That means carbon emission will rise as transport demand rises…LSMATS contains no key performance indicators (KPI) or any acknowledgement of meeting the Climate Action Plan's targets to reduce transport emissions.'

Clare PPN stated, 'we would like to see the potential for multi-modal trips being addressed in future transport modelling, identifying active travel – public transport connections to serve the people in the area – both in rural and urban centres.'

The Green Party suggested 'our interpretation of the modelling is that LSMATS will increase transport-related emissions over the next twenty years, instead of dramatically reducing them.'

Limerick Chamber also raised concerns in relation to the modelling, they stated 'the draft LSMATS (and the modelling that it uses) does not align with the Project Ireland 2040 objective of compact growth which is also endorsed under the UN Sustainability Goals and RSES. Modelling used in the draft LSMATS assumes that historical patterns of suburban growth will continue which will undoubtedly lead to further hollowing out of, and increased dereliction rates within, Limerick's city centre. The population figures in the Transport Modelling Assessment (p.29), show projected growth as being concentrated in the suburbs and county area…These suburb-centric metrics are used as critical inputs, namely origin-destination co-ordinates, in the modelling process. Such an assumption has major implications for how the city will develop over the lifetime of the plan. If the local ambition of centric growth is realised (as initially evidenced by the proposed Colbert Station development and the UL city centre campus plan) then the transport strategy will cater to populations which will not exist while failing to serve the greater concentration of people in the city core. The outputs which are generated will overestimate the use of private cars (less people in the suburbs) while underestimating the need for shorter journey options by public transport and active modes.'

Better Ennis called for shorter trip-chained, community mobility patterns and potential reduction of frequent longer commuter patterns by private car to be included in the modelling for the redraft of LSMATS.

A respondent stated 'while the draft LSMATS is unacceptable in its current form, that is not to say that it has been a complete waste of time. Much of the baseline information which has been collected is good and can be readily adapted to produce a realistic traffic model where less motorised traffic is required. This is in contrast to modelling requirements where traffic growth is modelled continuing for the next twenty years.'

An individual noted 'the modelling is just modelling, and I would argue that the parameters set out in the documentation made available are lacking clear, coherent parameters with sufficient explanation of people's views.' They also stated, 'the modelling undertaken regarding rail transport in Limerick and Shannon is not reflective of actual people's opinions.' A further stakeholder questioned the modelling used in relation to rail and noted the modelling 'is flawed, as it riles out the potential of what heavy rail could deliver…the existing draft study, as currently written, fails to maximise the potential of rail in the strategy. This is partly down to how the modelling for rail was done in the Transport Options and Network Development Report of June 2020 and looks at rail only in the context of corridors directly connecting the city centre and not holistically in the context of the overall existing rail network and its potential.'

Several other more detailed matters were raised about the overall appropriateness of the model in terms of its base year, calibration and validation; the use of data that was perceived to be obsolete; and the manner in which schemes and transport modes were coded and assessed.

8.5.1 Response - Modelling

The NTA notes the issues raised in relation to the modelling undertaken for the draft LSMATS. Much of the review of the process, which was undertaken in detail by a number of respondents, was based on the Calibration and Validation Report for the Mid-West Regional Model, which does not represent the modelling undertaken in the assessment of the LSMATS itself, which was set out in the Transport Modelling Assessment Report published with the draft LSMATS. As such, many of the issues raised were based on a misinterpretation. The NTA is of the view that the model used in the draft LSMATS was robust and appropriate.

Notwithstanding the above, a number of modelling updates have occurred in the period since the draft LSMATS was appraised and these updates have been applied to a number of additional modelling exercises that were undertaken for the revised draft LSMATS, including a more detailed examination of potential for cycling and emissions.

8.6 Social Inclusion

Cllr Frankie Daly noted 'transport is critical to how modern cities operate, and a good integrated transport system will give Limerick a competitive advantage as it seeks to grow and expand. Access to affordable public transport and high-quality cycling infrastructure is critical to improving access to work and education for people living in disadvantaged areas in our city and the commitment to address the current deficiency in our transport network in these areas is very welcome.'

University of Limerick noted 'transport exclusion is a real and very serious issue for underserved communities in Limerick especially in Regeneration Areas (Moyross, Southill, St. Mary's Park and Ballinacurra-Weston) are

inaccessible and isolated from adjacent neighbourhoods and the city centre – leading to social, economic and physical isolation. St. Mary's Park is currently categorised as the most deprived area in the country and as an unemployment blackspot. How can this strategy firstly ignore transport-related social exclusion in its principles and secondly maintain that this document is inclusive when it makes no reference to the Regeneration Areas?'

Limerick Chamber stated, 'the draft LSMATS accessibility and social inclusion outcome is an increase of just 6.2% in public transport mode share for disadvantaged and very disadvantaged areas. Cork's strategy sees a higher increase of 10.9%. This is noteworthy given that in 2017 eight of the top 10 unemployment blackspots were in Limerick with an average unemployment rate of 35.7%.'

A further submission echoed this sentiment regarding transport exclusion, noting 'a city region modelling car usage of some 50% for 2040 is not one which is built for those who cannot afford a car…it excludes or sets up additional barriers to employment to social services to recreation for those who cannot afford a car. It is a strategy to cement in structurally the inequalities we have today and want to remove.'

The Labour Party called for a stronger focus on social cohesion, while a business commented, 'LSMATS should address the standard to which the implementation should adhere to, to ensure that active travel networks enable people of all ages, genders and abilities to move safely, and comfortably around their own communities in the area.'

A respondent noted, 'if Limerick wants to become a City where everyone is given equal opportunity to succeed in their life, then it should be a priority to invest in a Transport System that is more effective, attractive and convenient than private car usage. Creating infrastructure to facilitate Urban Transit and Active Travel will unlock a higher standard of living for all and create a more free and equal society.'

One respondent questioned was the gender gap considered in design and asked, 'what specific actions are envisaged to address gender disparities in active travel.' The submission also noted, 'women's travel choices are largely impacted by personal security concerns…reliance on greenways as key strategic routes will exclude women or indeed anyone who would feel vulnerable in such settings…. the burden of household related travel often falls disproportionately on women. Planning fails to recognise that the school run is often a multi-purpose trip, a networked journey that serves more than one purpose. Focusing on cycling to school without adequate provision for trip-chaining disadvantages care givers.'

8.6.1   Response – Social Inclusion

A new section has been added into the Background section of the LSMATS report and into the Land Use chapter addressing the issues of social inclusion and Limerick Regeneration.

8.7   Accessibility

The feedback received included recommendations for improved accessibility, audible announcements, accessible website applications, station and bus stop design to include ticket purchasing, accessible signage, tactile paving. The use of colour contrast was also suggested alongside, parking for people with disabilities park and ride facilities, provision for drop off and departure points, wayfinders, the number of transfers a person may need to take, the exterior and interior of buses and trains, the language used in announcements and training of staff to provide support to people with different disabilities. It was also noted that all design must adhere to EU standards and the UN Convention of the Rights of Persons with Disabilities.

The Clare PPN stated, 'our members have noted that they seek commitments to more accessible spaces on trains so that disabled people can travel together in a carriage if they choose – they suggest the possibility for carriages with seats that can be folded back to provide space for those who use mobility aids, wheelchairs and for those travelling with children.' They also requested a 'commitment to ensure that changing places (spacious bathroom facilities equipped with hoists and changing stations for adults and children) are incorporated into all infrastructure developments including transport options. Such facilities determine whether certain journeys are possible for disabled people and those travelling with them.'

It was noted 'the news that cyclists will in future be allowed to share a footpath…is likely to make many people with impaired vision stop going out independently. This could have a serious impact on a person's physical, mental and emotional health, long term.'

Regarding cycling infrastructure, a submission noted 'for many people with disabilities, cycling offers a means of transport that brings significant health benefits and restores a sense of independence. Some disabilities – for example, vision impairment, may exclude people from holding a driving license. As such cycling should be

considered a key transport option for people with disabilities. Access for people with disabilities should also inform the standard of cycling infrastructure that is provided.'

The link between accessibility and social exclusion/inclusion was discussed in several submissions. One respondent noted, 'a basic level of accessibility A basic level of accessibility is ease of reach. This informs the concept of accessibility planning, which builds frameworks for accessibility strategies, that underpin transport strategies. This process needs to be informed by extensive stakeholder engagement and development of national and local indicators. In Ireland when we discuss accessibility in terms of transport, we are largely led to policy on people with disabilities. Whilst this is a very significant part of the accessibility picture, it does not capture social exclusion.'

The adoption of the Universal Design Approach was featured in many submissions, one noted the importance 'of adopting and implementing the Universal Design approach for every aspect of LSMATS.' They noted by adopting this approach, 'the regeneration and transformation of Limerick City and Shannon will lead to an integrated and accessible metropolitan area that can be easy to access, understand, use and enjoyed by everyone regardless of age, size, ability or disability.' Recommendations on how to apply the Universal Design Approach were also provided.

It was recommended that LSMATS provide additional attention to accessibility of the transport system, ensuring that all services and infrastructure incorporated into this plan are disability proofed, and that regular audits take place. It was also recommended that a disability charter is essential in the strategy along with regular engagement with disability groups.

A submission outlined recommendations for residential and commercial areas to properly accommodate older people, these included provision of refuge islands, curb extensions and improved visibility at crossings.

8.7.1   Response – Accessibility

A new section has been added to the Background section of the LSMATS setting out how the issue of Accessibility and Universal Access to the transport system is a pillar of the strategy. It runs through every section of the strategy and the NTA has endeavoured to highlight this aspect more clearly in the document and ensuring the Authority's commitment to universal access is communicated clearly.

8.8   Travel to Schools

The topic of transport around schools was discussed throughout the submissions. Several respondents requested 'safe, car-free school zones should be developed at all primary and secondary schools in Limerick to encourage children walking to school.' A submission noted that 'safe, segregated cycle infrastructure was due to be delivered to all primary schools, secondary schools and third-level institutions by the end of 2020 under the 2009 National Cycle Policy Framework. LSMATS only has a very loose commitment to delivering this already delayed promise by 2040. With the clear knowledge that school traffic is the primary factor in Limerick's rush hour congestion, routes to school must be prioritised and front-loaded in the implementation plan. This requires a clear plan with specific KPIs to ensure this essential goal is not missed yet again. Education needs its own section within LSMATS with a clear and specific modal shift target for cycling and walking.'

It was noted that the number of children cycling to school has risen by a large amount, a respondent stated 'LSMATS was written when the numbers cycling looked very different and we argue that the government is duty bound to entirely review this draft document to support the numbers of children cycling (and walking) to school with specific and precise targets and commitments.'

Further recommendations by respondents included, school streets and school zones by 2025, specific cycling modal shift targets for each education sector, greater vision in LSMATS on how the integration of schools in terms of walking and cycling network, inclusion of an Education Transport-Plan and/or School Travel Strategy, improvements to permeability for residential areas to open up safe passage for schools, improvements to infrastructure around schools, and the introduction of 30km/h zones outside schools.

8.8.1   Response – Travel to Schools

While the NTA is of the view that the vast majority of issues raised in relation to school's travel had been accounted for in the draft LSMATS, it is clear now that this aspect was not communicated or highlighted clearly enough. It is also clear that there is a significant impetus for school travel to be dealt with in the LSMA as soon as possible and for changes made to the networks in the short-term to address the weaknesses. The NTA is

satisfied to work with the local authorities in this regard and has developed the Safe Routes to School programme with An Taisce to bring greater momentum to this than there may have been in the past.

In relation to the LSMATS report, a new section in the Land Use Chapter has been included which will clarify and highlight this issue.

8.9   Public Consultation

Many submissions thanked the team for inviting submissions on the strategy and asked that their views would be considered by the Project Team going forward. A number of submissions received called on the Project Team to redraft the strategy and consult again with respondents.

Limerick Chamber noted that they had engaged in several briefings during the consultation period, noting that they asked that the strategy formulation be paused as a result of the pandemic. They expressed that a second consultation should be conducted in advance of the final document.

A number of submissions called for a second round of public consultation. One stated that the conclusions needed an overhaul and requested that a new proposal for consultation be put into place.

The NCBI noted that it is 'imperative' that they and people who are blind and vision impaired are consulted at the very start and at every stage of the strategy's development. They expressed that the strategy needs to be disability proofed from the very beginning 'because we firmly believe that many of the issues currently being experienced by people who are blind, or vision impaired across public transport and inaccessible streets would not exist if projects were disability proofed from day one.' They stated that information should be fully accessible to the blind and visually impaired in this consultation and recommended that websites used as a part of this project would be designed with accessibility features. They expressed that the Department must ensure that all of its apps and websites must comply with the EU Web Accessibility Directive, which ensures that all websites and apps are accessible and noted that they can offer advice on accessibility standards required. They recommended designing an accessible app and access guide, using London and Queensland rail as an example as well as integrating clear print in communications collateral. NCBI asked to be kept informed if they planned on separating cyclists from pedestrians and asked that they be consulted, and the needs of the blind be taken into consideration.

Mid-West NRDO stated that they welcomed the opportunity to make a submission and noted their involvement in many transportation projects in the region. They noted that they aimed to highlight the importance of major infrastructural projects and this to be acknowledged within the strategy.

It was noted that the progress of the various projects detailed in the strategy needed to be communicated in a transparent nature with respondents. It was noted that the ability to see progress would give confidence to respondents.

Deputy Maurice Quinlivan TD expressed that there was insufficient detail in the strategy and that he believed ' it is not adequate as a response to the transport needs of the city of Limerick and the wider Shannon metropolitan area.' He requested that the consultation period be extended to allow for further stakeholder engagement. He stated that the proposal 'as it stands is lacking significantly in detail and metrics.' It was noted that there was no measure for success outlined within the strategy or robust completion dates.

One stakeholder expressed that the information provided in the consultation was unclear and they were unable to tell if the project was in 'an advanced stage of a decision-making process.' They noted that the strategy 'gives the impression that an agenda has already been set.'

A National Technology Park traffic group expressed that they required information on available supports to fit out the premises with cycle stands, changing stands and facilities of that nature in addition to information on best practice for promotion of car sharing, information for putting in place Mobility Management Plans.

One submission recommended an ongoing monitoring review mechanism to monitor the incorporation of new information.

Tipperary County Council cited the strategy document, stating that 34 respondents were consulted, noting that they were not one of them. They requested to be added to this list of respondents in the future stages of the strategy. They asked the team to be cognisant of the issues raised in their submission.

TII stated that there was 'comprehensive and positive stakeholder engagement' undertaken during the project, noting that they found this to be beneficial.

The EPA cited its role in promoting transparent integration of Environmental Assessments and noted that this did not include approving or enforcing SEAs or plans. They welcomed the opportunity to comment and stated that they would focus on topics within the EPA's remit.

Shannon Municipal District outlined the role that Clare County Council and elected officials have played in ensuring that Shannon has been included in the 'significant strategy' through their proactive involvement in the Southern Regional Assembly discussions. They stated their involvement in the virtual launch of the event and noted that they work closely with the community. They stated that a quality transport system for the future sustainability of the region is important and an opportunity to inform the policy that underpins it.

A local primary school teacher noted that they were an involved member of active travel advocacy groups. They expressed that there were gaps in the public consultation providing just one opportunity to consult and noted that engagement to date had been 'poor.' They expressed the need for a redraft of the strategy and further stakeholder engagement.

A submission cited the principles for public consultation as per the Department of Public Expenditure and Reform guidelines, noting that the LSMATS consultation did not meet these standards. It was noted that the Covid-19 pandemic had not been considered and it was asked that the strategy be withdrawn and rewritten.

Clare PPN welcomed the opportunity to make a submission. They expressed that they were unsure if certain communities impacted by the strategy were aware that it was being consulted on. They further expressed that they had not been notified of public events on the consultation. They outlined that 'we feel that much better use of local media, radio, Zoom meetings etc could have been made in order to ascertain the views of people living in Clare.'

One submission commented that LSMATS should have a subsequent round of public consultation noting that this round was 'negligible,' falling short of public sector guidelines. The document expressed that Minister for Transport Eamon Ryan had been called upon to review the document. The submission outlined that the Project Team needed to focus more on two-way engagement.

It was noted by a respondent that they would call on the Project Team to pause the process and redraft the strategy and implement a 'more meaningful' consultation. It was stated that individual public representatives and advocacy groups had to step in to fill this gap due to a lack of public meetings. They stated that 'the ELTIS EU Urban Mobility Observatory has devised a concept for Sustainable Urban Mobility Plans - of which consultation and participation by respondents and the public are critical elements. Such a model should be employed by LCC and by NTA for this process.'

Limerick Cycling Campaign stated that 'every political party elected to Limerick Council has come out in opposition to this poor draft strategy' due to 'its lack of vision and ambition,' citing comments elected representatives had made. They expressed disappointment at the public consultation, stating that Limerick PPN had not been contacted by the Project Team. They expressed the various ways they had fostered engagement on the strategy in the community.

It was stated that members of the public 'have not been supported to engage' with the strategy. It was stated that the document was 'undemocratic' and against consultation best practice.

Cllr Padraig Lohan stated that the people impacted by the strategy were given 'little voice', noting that the consultation fell 'far short of what is necessary.'

Cyclist.ie expressed that the consultation had been 'totally inadequate', falling short of public sector guidelines as no public meetings had been held. It was noted that despite political parties voicing concerns and asking for consultation to be paused, this had not happened. They called for an additional 'meaningful' consultation process after this round of submissions were taken into account by the Project Team and an amended draft was made public.

Limerick Pedestrian Network stated that they had 'grave concerns' about the integrity of the consultation process and have received 'little assurance of the potential impact of submissions.' They expressed that consultation guidelines outlined by DPER were not followed. They called for a more 'meaningful' consultation to be held and stated that the strategy was 'roundly rejected' and asked that the updated strategy be more in line with Government policy and cognisant of the pandemic impacts.

A submission stated that the strategy should be 'significantly revised' with input from respondents, stating that their perspectives are 'much closer to the objectives laid out in the Programme for Government (PfG).'

They expressed that several stakeholder groups were against the plan and called for additional public consultation, noting that Limerick PPN had not been consulted with and criticised the lack of public consultation events. They called for the consultation be paused and a new draft to be prepared that is in line with submissions received. The Irish Georgian Society expressed that despite Covid-19 preventing open days, they were disappointed that no online platform had been provided for engagement for the public. Those behind the submission explained that they had collaborated to drive engagements on LSMATS throughout the city, attended and presented at public sessions, hosted their own public events and engaged in numerous other settings.

8.9.1   Response - Public Consultation

The public consultation on the draft LSMATS was originally intended to occur during spring 2020. This was delayed due to the Covid-19 pandemic. As the pandemic developed and progressed, plans for the publication were repeatedly subject to change. As the situation improved and restrictions began to be lifted, plans were put in place for its publication accompanied by several public events and full in-person engagement with the public and stakeholders during the consultation phase. As the situation deteriorated in early autumn, these were all cancelled, and the consultation moved online in its entirety.

Notwithstanding this, the opportunity to engage in virtual events was there and was taken up by the NTA at every opportunity. The NTA took part in 11 events in the first six weeks of the consultation period, including one public event, several meetings with key stakeholders, public representatives and one radio interview. Engagement with the media and via social media also occurred throughout the consultation. This is all set out in Chapter 4 of this report.

Despite these challenges, the rate of response demonstrated that the level of engagement was satisfactory relative to previous metropolitan or regional transport strategies.

However, given the nature of the responses and the importance the NTA attaches to public participation in our plans and programmes, it was decided to undertake a second round of public consultation on a revised draft LSMATS.

9. Policy

Several submissions referenced National, Regional or Local policy in their submissions. The following section outlines comments made by respondents in relation to policy and the draft LSMATS.

Many respondents stated that the LSMATS did not align with current Government policies, 'we do not feel that the strategy as presented meets the targets set in the current Programme for Government, the National Planning Framework or in the Climate Action Plan.' With a further submission noting 'it is imperative that the strategy is aligned with the existing statutory framework and capital funding envelope, to include Project 2040, The Regional Spatial and Economic Strategy for the Southern Region and the Local Development Plans.

The Southern Regional Assembly outlined how the LSMATS and policies are interlinked, noting 'the RSES and MASP provide an important statutory process and objectives that underpin the Metropolitan Area Transport Strategies for Limerick Shannon Metropolitan Area. Zero carbon, technology driven multi modal travel system will lead to healthier cities and Metropolitan Areas.' They go on to note, 'it is considered that the NTA should strengthen Section 2 and 4 of LSMATS to acknowledge the statutory role of objectives of the RSES and the Limerick Shannon in addition to the policy objectives of the NPF.'

Several submissions called for a more ambitious plan 'in line with local needs and national strategies and targets.'

9.1 National Policy

Many respondents discussed at length the integration between national policies such as the National Planning Framework (NPF) and LSMATS. This section outlines comments made by respondents in relation to the NPF, the National Development Plan, Project 2040 and Climate Action Bill 2019.

One respondent also noted that the inclusion of the Draft National Investment Framework for Transport Investment (previously PLUTO), would be beneficial.

The Irish Cycling Advocacy Network noted that the 2009 National Cycle Policy Framework targets and ambition were absent from LSMATS.

Shannon International Airport is featured in both national and regional policy and it was noted by Shannon Municipal District that 'the government support of Shannon International Airport is paramount to the success of LSMATS.'

9.1.1 National Planning Framework

One respondent commented that it is recognised that the National Planning Framework (NPF) forms the foundational basis in law for the draft LSMATS. Another submission noted 'having regard to the stated aims and objectives of the NPF, it is submitted that the provision of appropriate transport infrastructure and the inclusion of specific transport related policy within the LSMATS is key to achieving the ambitious targets set out within national level planning policy, including the growth targets identified for the economic development of the Limerick Shannon Metropolitan Area.

The Environmental Protection Agency stated the National Transport Authority should ensure that the Strategy aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework.

Iarnród Éireann noted while there are transport objectives stated in the draft LSMATS there are opportunities that could be included and expanded on in LSMATS to improve the Limerick City and County, and the Shannon Area. They noted the commitment in the NPF to balanced regional development and prioritising rail projects on existing and disused lines.

A business organisation noted that 'the National Planning Framework 2040 (NPF) envisages that the Limerick Shannon Metropolitan Area (LSMA) will become the growth engine of the Mid-West Region with projected growth of at least 50% during the period up to 2040. This projected and associated economic growth will undoubtedly result in a significant increase in demand for travel, which needs to be managed and planned for carefully in order to safeguard and enhance the LSMA's attractiveness to live, work and invest in.'

The Land Development Agency stated 'it is noted that the Strategy has been developed to be scalable and flexible enough to meet changes in population and employment growth and is subject to periodic review every 6 years. The Draft LSMATS is underpinned and informed by National policies; the most important of these the National Planning Framework 2040…the NPF sets out Ireland's planning policy direction for the next 20 years.' They requested that 'given the policy context and ambitious growth targets, periodic review of the transport model forecasts will be important to support planned growth in a compact and sustainable manner.'

One respondent said 'the NPF signals a commitment to more compact and sustainable forms of growth. This includes acknowledgement of the need to play catch up with transport infrastructure in an effort to improve public transport and to reduce the high dependence on the private car. With regards to Limerick – the framework commits to the…provision of a citywide public transport network, with enhanced accessibility from the City Centre to the National Technological Park, UL and Shannon Airport and the development of a strategic cycleway network with a number of high capacity flagship.'

Several respondents discussed the objectives set out in the NPF including enhancing connectivity in the region, establishing accessibility through road links and Shannon Airport.

9.1.2   National Development Plan

A business organisation outlined the National Development Plan's (NDP) commitment to meeting Ireland's infrastructure and investment needs and outlined the projects that will meet these needs in the Limerick Shannon region. They added 'the phased delivery of the projects as identified in the NDP are considered to be key to ensuring an effective metropolitan area and it is of significant importance that the delivery of these projects are facilitated.'

Transport Infrastructure Ireland (TII) outlined that TII 'in collaboration with local Councils, is developing/progressing national road schemes and improvements in the region which will enhance regional accessibility in accordance with the National Development Plan (NDP) investment commitments. The NDP investment commitments do not include any improvement works to the M7 and associated national road junctions as outlined on the 'Proposed Road Network 2040' map of the draft LSMATS.' They added 'TII will not be responsible for the funding of additional schemes or improvements where they are not included as NDP investment priorities or included in TII's funding commitments.'

One respondent noted 'I believe that the exclusion of the Ballyclough community from the public transport planning is at odds with the objectives set out within the National Development Plan.'

9.1.3   Project 2040

Iarnród Éireann discussed Project 2040 in their submission and the various frameworks and plans included in Project 2040. They noted 'the LSMATS should seek to harness the strategic objectives from Limerick and Shannon in these policies as it is crucial to the ongoing development of the State's third city.'

One respondent outlined that the N/M20 Cork to Limerick scheme was a key element in Project 2040.

9.1.4   Climate Action Bill and Sustainable Transport

9.2   Regional Policy

The Regional Spatial and Economic Strategy (RSES) for the Southern Region was mentioned numerous times in submissions received. One stakeholder noted 'the Transport Strategy is a key ingredient alongside the statutory plans of the region's constituent Local Authorities, in giving a focused local physical expression of how the framework and principles and the specific projects cited in the RSES will be developed and will function in transport terms.'

A business organisation noted that the NPF and RSES envisaged key economic development in the Shannon-Limerick area through transportation, accessibility and inter-regional connectivity and noted to achieve these objectives significant investment in physical infrastructure is required.

The Southern Regional Assembly noted 'the LSMATS is a key implementation tool for the RSES transport strategy.'

With regard to specific objectives outlined in the draft LSMATS, Cllr O'Donnell noted that sections of the draft do not align with key priorities in the RSES, specifically rail and the commitment to balanced regional development.

A business organisation noted the guiding principles of the Metropolitan Area Strategic Plan (MASP) and added 'the Limerick Shannon MASP acknowledges that integrated land-use and transportation related policies are integral to unlocking the full potential of the metropolitan area, allowing the region to compete nationally and internationally. In consideration of this, the Limerick Shannon Metropolitan Area Transport Strategy will be a key factor in the regeneration of Limerick City and the wider Limerick Shannon Metropolitan Area.'

One respondent noted, 'we recognise that the Limerick Shannon Metropolitan (LSMATS) Area Strategy supports the policy objectives identified for the region within the NPF and the RSES for the Southern Region. Appropriate transport infrastructure and an integrated transport system are critical to achieving these aims… One of the key transport growth enablers of the RSES is to provide a Citywide public transport network which provides enhanced accessibility from Limerick City Centre to the National Technology Park, UL and Shannon Airport, in order to attract and enable ease of movement around the region. This key growth enabler has in turn been adopted as being the Key Growth Enabler for the Limerick Shannon Metropolitan Area.'

9.3   Local Policy

Limerick Chamber noted that the most recent 'iteration of a vision for Limerick was the Limerick 2030 Economic and Spatial Plan…this plan has not been updated since 2015 and does not reflect recent work by the Council…it is therefore a concern that the draft LSMATS which will be completed before the local development plan, does not attempt to identify a vision for how it will support Limerick's future development.'

Shannon Group discussed in their submission the Shannon Town and Environs Local Area Plan 2012-2018 which proposed new cycle routes linking Shannon Airport to the town and incorporating the lands of Shannon Free Zone via cycle parking facilities and routes. They stated that 'in order to align with future economic growth and development of the area, the LSMATS must recognise the need for the provision of additional cycle links.' They added in relation to Limerick's Bicycle Sharing Scheme, 'we submit that the LSMATS should include a direct policy objective which facilitates the extension of the scheme to Shannon Town.'

A submission referenced the 2015 Arup Limerick Metropolitan Cycle Network Study and stated that this study 'has essentially been lifted and dropped directly into the LSMATS Draft Plan.'

One stakeholder noted that Limerick Council Authority is in the process of preparing a 2020/2028 Development Plan for Limerick City and Council and stated the team did not submit the draft LSMATS to the City Development Planners.

Clare PPN stated concerns that 'LSMATS 2040 will be incorporated into the forthcoming Clare County Development Plan.' In addition, it was noted,' LSMATS is being presented as a non-statutory document. However, it will be adopted into the Limerick City and County Development Plan 2022-2028, which will give it statutory status. The ambitions set out in LSMATS (or lack thereof) will be locked into the city at least for the lifetime of the Development Plan.'

9.4   Response

The LSMATS comprises the transport response to the overarching policies of national and regional government. It has also been prepared in full compliance with the objectives of the two local authorities as set down in their development plans, and as have emerged through the LSMATS process. As such, the strategy reflects fully the aspirations for the Limerick Shannon Metropolitan Area set down by those responsible for their development.

Notwithstanding this, the NTA is satisfied that the strategy report could benefit from a review of how these issues are incorporated into the text. As such, it has been re-examined in light of the above comments, and changes made where deemed appropriate by the NTA.

10. Existing Transport Context

The following section outlines feedback received in relation to the existing transport context.

10.1 Walking

Several submissions expressed opinions and made comments around the existing walking infrastructure and amenities in the LSMA region at present.

Shannon Chamber stated that Shannon offers a good potential for walking at present using the existing network of 'off-road and riverside pathways and rural roads.' They expressed that current proposals appeared to focus more on the roads network for pedestrian paths. Shannon Chamber members and local residents believed that utilising existing amenities was a 'missed opportunity'. They further expressed that the opportunity has been missed to date to refocus walkways on the existing black path network that already exists and is extensively used in the town. Shannon Chamber stated that the walking trails mentioned in the strategy, such as Estuary Trail West; Slí na Mara Trail; Estuary Trail East; and Free Zone Estuary Trail were based on hard pathways next to roads around the town. They shared that 'the existing Shannon Walks' signage does not include direction indicators, lacks a map or wayfinding and is focused on urban footpaths and roadways not greenways.'

One submission from an individual explained that the community of Ballyclough has been under serviced with the provision of walking infrastructure in previous county development plans. They stated that 'the community area is characterised by the limited number of footpaths with no overall inter-connected network.'

The Shannon Group expressed that they 'welcome the appropriate upgrade of the pedestrian environment in Limerick City Centre' however, highlighted that 'the existing quality of the pedestrian environment from Limerick City Centre to King John's Castle is inconsistent with mixed surfaces which are in need of upgrade. Moreover, lack of awareness of routes and distances to King John's Castle and the Medieval Quarter of Limerick City is often viewed as a barrier to walking.

One submission explained that they work in the education sector and were based in Southill, Old Cork Road, which is an area poorly served by both walking and cycling infrastructure and public transport options.

Another submission expressed that Historic Limerick is a walkable city with a 'superblock' layout. It was explained that one of the primary reason's locals make such use of the Crescent Shopping Centre, is that 'it is walkable, but also that cars do not drive on the internal shopping streets, making it a safe place for young and old, with seating dotted around at intervals.'

10.2 Cycling

Shannon Chamber expressed that Shannon offers significant potential for cycling using the existing network of off-road and riverside pathways and rural roads. They stated that 'these are used as informal networks by people in the town and the surrounding area' and expressed should be considered in the strategy.

One individual explained that they were 'lucky in recent months to maintain the cycle lane on Shannon Bridge,' following its introduction as part of Covid-19 mobility measures. In recent weeks, it's been reduced in size at the section where it meets the Dock Road roundabout, noting 'we were told on twitter that this was to allow for 'abnormal load bearing HGV's to make their way around the roundabout'. HGV's in the main are meant to use the tunnel to cross the river.' They expressed that this was not in the interest of health and safety and a 'reckless' decision without consultation with the 'cycle bus,' which transports up to 40 children each day.

Another respondent explained that they have previously advocated for a cycle lane on one of the local bridges.

10.3 Bus

Shannon Chamber requested that reference should also be made to private bus services that serve the Shannon area, for example, there are services which use Bunratty for onward connection to Limerick, Cork, Galway and Dublin. They stated that 'these are important indicators of potential demand for Shannon Town, Zone and airport bus services.' They expressed that there was interest by private operators to provide additional services on routes, 'for example, from Sixmilebridge to Shannon and from Shannon Airport to main city locations.' They stated that further explanation is warranted as to what is required of private operators to make such routes commercially viable from a transport strategy perspective.

An individual expressed that bus transport in Limerick is perceived to be a poor alternative to the car. They stated that 'the bus services in Limerick City are generally regarded as a second-class mode of transport with many people upgrading to a car as soon as they can afford to do so.'

Another individual cited that Limerick has an extensive bus network at present, however that congestion from cars continued to worsen annually. It was stated that 'long journey times and delays on the current bus network are caused by sparse and poorly implemented Quality Bus Corridor (QBC) infrastructure forcing Urban Transit vehicles to share lanes with private car traffic.' A number of issues were expressed regarding Bus Éireann's current service, including long wait times, long journey times, being an unattractive method of transport, lack of infrastructure and the volume of air and noise pollution. A respondent stated that a recent budget allocation to a UL to City Centre Bus Corridor highlighted the beginning of a change to tackle traffic congestion. They remarked that 'investing in and pursuing full implementation of a QBC to provide a compelling alternative to private car dependence in Limerick City is critical to enable the sustainable development of our City going forward.'

One submission explained that Limerick's existing bus station, Colbert Station, had a very unique location with land available for development. They suggested that the Project Team should consider it as a multi-functional transport hub.

It was expressed that prior to Covid-19, Bus Eireann local bus 343 connected Shannon Airport with Limerick City, operating 24 services daily, with a journey time of approximately 50 minutes. This submission stated that in order to assert public transport as a viable alternative to the use of the private car for commuters to and from Limerick City and Shannon, there is a pressing need to develop a higher frequency and more efficient service of 30 minutes between the city and the airport. The Shannon Group made a similar comment, stating that prior to the arrival of the Covid-19 pandemic, there were a total of 67 coaches going from Galway to Dublin Airport. They stated that this is having a 'seriously negative impact on passenger numbers at Shannon Airport. Having regard to the primary aim of the NPF which is to direct an increased proportion of growth towards the second-tier cities, outside of Dublin, it is considered that providing for increased direct public transport services between Shannon Airport and Galway would aid in safeguarding the status of Shannon Airport as a key economic driver for the Mid-West Region.'

The Irish Wheelchair Association stated that there was inadequate frequency of buses in local rural areas. While a submission received expressed that the town of Ballyclough is not supported by public transport currently.

One stakeholder expressed that current bus services are unreliable and significant investment is required urgently to improve this 'so that people will use public transport in greater numbers and reduce dependence on using cars to access the city centre and the university.' Another explained that the scheduled time for UL to the IDA Raheen is inadequate and discourages use by commuters. They stated that in addition to this, the schedule is often inaccurate, leaving students often having to move or find an alternate means of transport.

10.4   Rail

Shannon Chamber asked if the current location of Limerick Train Station the optimal location for growth.

Iarnród Éireann expressed that the existing rail network in Limerick is a vitally important component of the local and regional transport infrastructure network, consisting of three lines originating from Limerick's Colbert Station. They additionally expressed that there is currently a disused railway to the south of Limerick City which traverses the densely populated areas of Dooradoyle and Raheen, and then continues west towards Shannon Foynes Port. Iarnród Éireann included plans and expansion opportunities in their submission, 'with the objective of improving the existing rail network in the LSMA, and why they should be considered for inclusion in the final version of LSMATS.'

It was expressed that the existing rail network does not fit neatly into each corridor identified in the report 'and as a consequence, the study has the potential to underestimate the potential of heavy rail and what can be delivered easily.'

Shannon Municipal District stated that they considered that the current models are based on the current service, which is not attractive to many users in its current operational condition.

Limerick City & County Council's Housing Development Directive asked the Project Team to protect the existing alignment of the Limerick to Galway rail line.

10.5   Roads

In reference to the University of Limerick, it was expressed that it 'was required to build vehicular and pedestrian bridges across the River Shannon to open up extensive land in County Clare in order to expand north without the limiting factor of other competing development.' They stated that full connection into County Clare is not available due to the deficiencies in the road network on the Clare side.

An Taisce Limerick recognised 'the extent to which recent national road projects, including the Shannon tunnel and motorway, improved connectivity but these projects have done little to improve access by public transport for non-car users.' An Taisce expressed that the Project Team were under the false pretense that a successful strategy could be developed by improving existing road infrastructure. 'It advocates doing so without considering whether those structures are appropriate in the first place. In doing so, the draft strategy affirms the notion that existing models of housing provision in the countryside and the dispersal of services away from urban centres is desirable and sustainable in the longer term.' An Taisce has said that by giving a low priority to other transport modes would be 'damaging' and 'unsustainable' in the long term.

One submission stated that the Project Team needed to consider new ways to accommodate for taxi services utilised at present. They stated that an increased use of apps would leave ranks becoming redundant and that trends ought to be considered.

It was expressed that the community of Ballyclough is strategically located 'at the merger of critical local and national road network with access to the M20, M7, N18 and N24 allowing onward journey to Shannon International Airport and all major national urban centres.'

The Irish Wheelchair Association stated that city streets are not wheelchair friendly. Explaining that the obstructions include menu boards, rubbish bins, tables and chairs. It was also mentioned that there are not enough wheelchair accessible taxis available and they are expensive.

A submission stated that barriers to entry in the city should be avoided. It was articulated that 'one such barrier that exists at the moment - the lack of direct connectivity from the M20 to the city centre is one that has been flagged in numerous fora previously. A connection from the M20 to the Childers Road area would greatly improve accessibility to the city and in turn avoid the use of rat-runs on the Rosbrien Road and Fedamore Road and ease pressure on the Dock Road/N69 junction of the N18 and more importantly assist in alleviating the traffic volume at the Ballysimon Road junction on the M7 and subsequent traffic build up on the Ballysimon/Tipperary Road roundabout. '

10.6   Shannon Port

The Limerick Docklands Framework Strategy was mentioned in a submission. It was noted that 'it seeks to retain all existing access points into Ted Russell Docks for occasional but essential use of port traffic.' It was recommended that the draft LSMATS understands the port strategy insofar as it has the potential to influence any transport and traffic changes on the R510. The submission also identified three district zones along the Dock Road which are likely to have different traffic demands and traffic types in the future.

The Shannon-Foynes Port Company (SFPC) submitted their Vision 2041, which includes objectives of their development strategy. They noted 'it is necessary that the LSMATS continues to provide an adequate policy basis to ensure that this investment can be realised through recognition and promotion of SFPC as a Tier 1 Port and continued support for enhanced connectivity.'

10.7   Response

The NTA notes the numerous appraisals of the existing transport network by stakeholders and members of the public. The LSMATS provides the framework for the investment in transport infrastructure and services for the next 20 years with the aim of addressing the deficiencies raised.

It should be borne in mind that, as a transport strategy at the Metropolitan level, the LSMATS is not the appropriate document within which details on schemes that are required to address the issues across the study area should be provided. Respondents should, however, be in a position to readily identify overarching objectives or policies within the revised report which cover the items they raised in the majority of instances. The NTA has endeavoured to ensure this is the case in the revised LSMATS.

11. Land Use

The following section outlines land use and growth targets as well as consolidation and distribution of land.

11.1 Land Use and Growth Targets

Limerick City and County Council noted 'as acknowledged in the strategy, a closer alignment of land use and transportation planning is needed to address legacy issues related to transportation practices, such as the high level of car dependency in Limerick City and associated negative social and environmental externalities.'

The Southern Regional Assembly noted 'the RSES policy objectives provide a strong framework for LSMATS to shape the distribution of growth targets by integrating land use and transport planning.'

A respondent noted 'the current LSMATS draft may be considered short on public transport options in areas of lesser population density and in particular in rural areas….to fail to address public transport in these lesser served areas risks fracturing the sense of identity awarded to LSMA by this the first formal strategy.'

The Limerick Green Party discussed at length land use and LSMATS, in their submission they noted the way to improve quality of life and economic growth is to ensure new housing is high quality and high density and is served by excellent public and active travel infrastructure and noted that LSMATS should have a clear strategy to eliminate car dependency. They endorsed the suburban rail and noted that Limerick is 'generally low density [and this] should not been seen as a barrier to these areas developing the longer term into high density, transit orientated settlements.' They added 'we believe the provision of new housing should not be contingent on building new roads.' An organisation discussed Shannon New Town and investing resources in the town and providing greater links to Limerick. They noted 'the development of the Limerick Shannon axis and strengthening its infrastructure rather than adding to Limerick city's sprawl northwards from the University and thereby adding to the burden of its overstretched infrastructure, might be a more sustainable goal in the long term.'

A separate organisation noted 'it is clear that in finalising the LSMATS, the importance of the intricate and complimentary relationship between Limerick and Shannon must be further emphasised. It is imperative that specific policy objectives are adopted within the plan which promote the integration of land-use and transportation policies and prioritise investment by relevant entities in providing an enhanced citywide public transport network and increased connectivity between key employment centres in Shannon, including Shannon Airport and Shannon Free Zone and Limerick City and surrounds are key to realising the potential of the Limerick Shannon Metropolitan Area , to attract and maintain economic activity and talent.'

One respondent noted 'the final LSMATS will be based, inter alia, on the land use assumptions set out in the Transport Modelling Assessment document. In my view, the assumptions underpinning the population growth locations in the LSMATS area should be revisited. Many areas currently zoned residential are located in areas which the CFRAM study has since found to be in the highest flood risk category, i.e. areas where housing development is deemed inappropriate.'

One respondent stated the LSMATS map showing population growth should be overlaid with a flood risk map of the same area to give a realistic picture of where housing development and population growth can and cannot take place. They added, 'just because an area is zoned residential does not mean housing can or should be built there. For example, the Caherdavin area population is forecast to double by 2040 from circa 5,500 today. 2,000+ of that population growth is forecast to take place in Clonmacken on lands where Celtic Tiger era planning permissions were granted for 500+ houses. However, these permissions have since lapsed and are unlikely to be renewed as the lands in question are now in the highest flood risk category, Flood Risk A.'

Ennis Municipal District outlined the population growth over the last 25 years and future growth and the investment required to meet this growth.

Shannon Foynes Port Company (SFPC) requested that LSMATS take into account the Limerick Metropolitan Area Strategic Plan (MASP) which identified a number of infrastructure and transformative projects for Limerick city including the extension of the city centre towards the Limerick Docks. They added 'whilst SFPC supports and promotes alternative uses in the wider Limerick Docklands in accordance with the Limerick Docklands Framework Strategy and supports an extension of the city centre, it must be clarified that alternative uses can only be promoted where they can co-exist with the operations of a commercial port. Ted Russell Docks within Limerick Docklands and as delineated in the Limerick Docklands Framework Strategy, shall remain as a fully

functional and operational port as long as it is commercially viable to do so.' They requested for this to be recognised within LSMATS and traffic and transportation in the LSMA planned accordingly.

An organisation with significant lands in the Limerick Shannon Metropolitan Area noted that their business and landholdings require 'an integrated transportation model which protects and attracts industry and economic enterprise to the area, allowing for the efficient and effective mobility of employees and businesses within the metropolitan area.' They added, 'in finalising the LSMATS, continued and enhanced recognition must be given to the importance of the Shannon Free Zone (SFZ)…as a key driver for the economy of the metropolitan area and the nation as a whole. Thus, policy objectives contained within the LSMATS must support the continued development and growth of SFZ as a key enabler of economic growth, by providing sustainable transport infrastructure to facilitate increased accessibility and connectivity from Limerick City and its surrounding environs.'

11.2   Consolidation and Distribution

An individual noted 'Limerick City currently suffers from decades of Low-Density Residential development, which has put tremendous strain on Public Services. Low Density Sprawl has resulted in the adoption of inefficient, meandering bus routes that struggle to serve small populations dispersed over large swathes of land separated by large vacant zones…the LSMATS must boldly draw a line in the sand and plan Transit Routes that promote Residential Densification.' They added that a greater emphasis on residential densification is needed to meet current and future housing demand as urban population is set to grow. Limerick Chamber noted 'the NTA's future vision of Limerick is contradictory to the one held by respondents where growth is concentrated in the city centre as families and individuals are incentivised to live and work there. Thus, ensuring the presence of a vibrant community that supports a thriving urban centre. The draft LSMATS fails to embrace this idea by ignoring developments such as Colbert Station and dismissing rail as a viable option.' They also noted that population distribution projections should align with regional and national policy around the principle of compact growth and present a version of the model with amended population growth dynamics based on more recent local land use developments.

An organisation noted that the biggest factor leading to increased car use 'is the continuing targeting of open countryside for the building of dispersed, solitary housing and nucleated multiple-dwelling settlements…the use of the open countryside as the terrain, on which the state's housing shortage problem will be solved, will create more problems than it will solve.' They added that 'transport policy cannot be considered as something separate from housing and settlement policy…unless housing and settlement is treated as an essential infrastructure and field of policy, transport policy will be merely playing catch up.'

A transport publication noted 'an efficient transport system is one of the key ingredients for the successful development or re-vitalisation of any city centre or suburb. The proposed development of the area around Colbert Station in Limerick is a great opportunity to breathe new life into the City and an opportunity to bring dynamic thinking and use the existing infrastructure to make travel to and from the city centre simple and almost seamless.' They also provided suggestions on the development of the Colbert Quarter.

The Land Development Agency 'respectfully recommended that the LSMATS takes account of the significant growth potential that the Colbert Station Quarter offers, noting the potential population increases in this area…this also offers an opportunity to achieve an even more ambitious step change in the number of people travelling by sustainable and active means to and from Limerick Colbert and support with achieving the LSMATS vision for the area.'

A developer discussed the transport infrastructure proposals in Corridor E of LSMATS and noted that there is a current planning application for residential development on lands at Ballykeeffe as well as possible additional zoning of residential land.

Another developer noted that their lands at Dooradoyle are 'well served by existing bus services and sits on the confluence of a number of proposed high priority bus routes and cycles routes' identified in LSMATS, 'its development will complement the existing amenities of the surrounding area…and will facilitate the creation of a critical mass to support the public transport vision as presented in LSMATS and in particular the required demand to support the Rosbrien Road public transport corridor.' They added, 'we would respectfully request that the emerging Limerick/Shannon Metropolitan Transport Strategy 2040 account for the potential increase in population and employment growth between now and 2040 associated with the Dooradoyle Urban Quarter.'

11.2.1   Strategic Development Zones

A number of submissions commented on areas of land that are being put forward as Strategic Development Zones (SDZ) including UL lands on the County Clare side together with lands in the hinterland. A respondent also noted that there are two significant areas in and around Ennis 'that need to be given Strategic designation as SDZ zones.'

It was noted in relation to the University Zone/Special Development Zone that 'this is an area that cannot fully avail of existing transport infrastructure and services because it is cut off from adequate road infrastructure. It cannot contribute to the City/region economy as it lacks road access into County Clare and onward to Shannon/Shannon airport. If the University is to be a "critical driver of the economy" in the Metropolitan Area/region it needs to have priority given to proposed land use areas of this nature as a recognised guiding principle in land use terms in the Transport Strategy and in respect of timely provision of the infrastructure.' Adding to this it was stated, that the development of the University Zone as SDZs 'is now dependent on public authorities to open up the necessary regional links.'

11.3   Response

The LSMATS comprises the transport response to the land use policies of national, regional and local government. The function of the transport strategy and the NTA does not include the zoning of land. Notwithstanding this, by providing for the first time, a framework for high-capacity public transport in the LSMA, the LSMATS facilitates future intensification of land use.

One of the core principles of the LSMATS is to support the consolidation of development into Limerick City Centre. The NTA acknowledges the views of those respondents who have questioned this aspect of the strategy, but it is the case that the LSMATS places no upper limit on the level of development in central sites such as Colbert station. On the contrary, the land use objectives in the LSMATS explicitly support this. This is set out in more detail in the revised LSMATS.

The NTA has also examined a future land use scenario beyond 2040 which is not constrained by prevailing national, regional and local policy, as part of the assessment of the potential for rail. The outcome of this study is set out in the rail report accompanying the revised draft.

12. Walking

Many respondents expressed support for the development and enhancement of walking facilities as part of the LSMATS. NCBI stated their delight, 'to read that there will be a re-allocation of road space to support more walking and cycling, and public transport.' The Shannon Group stated, 'the draft LSMATS generally promotes improvements in the environment for pedestrians in key centres of the Metropolitan Area as part of the overall strategy, which is welcomed.' The Labour Party stated, 'the Party welcomes the additional emphasis on walking and measures designed to promote walking as the primary means of transport within the city centre.' The Party continued, 'we support the proposal to appoint a dedicated Walking and Cycling Officer within each Local Authority and recommend that these appointments be made in the first year of the life of the Strategy.' IBEC noted that the benefits of increased walking would 'lead to more economic activity, reduced congestion, better air quality and an overall improved quality of life for residents and workers throughout the metropolitan area.'

One individual added, 'I am very much of the opinion that investing time and resources into public transport and walkability is vital if Limerick City wishes to continue to grow and thrive and to effectively compete with these cities.'

The Rehab Group requested that the planning of bus routes and park and ride facilities is considered to include people with limited mobility to make their journey more comfortable and accessible. They added 'the poor condition of footpaths in the Limerick Shannon area resulting in access issues was highlighted.' The Group welcomed the Walkability Audit in the Plan, stating that it was successful in Carrick-on-Shannon and requested that students and services users be consulted during the audit.

Clare County Council suggested strengthening the links between the town centre, residential and commercial areas would be welcomed, an ambition of the Shannon Town Green Infrastructure Plan. The Council stated that recent upgrades and future plans would 'strengthen the walking links between the town and the commercial zones with a view to enhancing the viability of Shannon Town.'

A developer stated the need for better local connectivity between Rosbrien and the shopping centre area through the provision of a local access route connecting the Rosbrien Road with the Doordoyle Road. They added 'the design of this new street will be focussed on pedestrians and cyclists and would offer some filtered permeability by all modes providing better local connectivity.'

One business owner suggested that 'the footpaths be turned into cycle paths and reinstate the dual lane for cars or reduce the cost of the toll (even between the hours of 8am to 9am to elevate the congestion).'

The Limerick Pedestrian Network outlined five key areas that they suggested LSMATS should focus on; the need for the principles of universal access and inclusion to be at the centre of the strategy; the need for the strategy to have an ambitious plan to reform the current pattern of school travel in the city and county; the need for health outcomes to underpin the strategy; the need for the strategy to align with the Climate Action Plan and the Programme for Government; and the need for the strategy to be rigorous with road safety and walkability audits carried out before and after implementation.

12.1 Network

A number of submissions provided suggestions or routes and links to improve the network of walking infrastructure to take better advantage of existing and planned routes. One business owner noted that a fourth bridge crossing in Limerick would provide a better network, stating, 'a fourth bridge crossings would accelerate smart travel'.

The Shannon Chamber referenced the river walk in Shannon and stated that a link to Bunratty and onwards to Limerick should be developed. The Chamber requested that the Plan 'refocus walkways in Shannon on the existing black path network that already exists and is extensively linked to the town.' In summary the Chamber gave detailed suggestions on network possibilities for the river, the Hunt Museum, Arthur's Quay Park and Shopping Centre, and a network from the city to UL and Annacotty.

The Green Party suggested network possibilities, 'Davis Street to Baker Place to Glentworth Street should be developed as a priority and intuitive pedestrian route from Colbert Station to the City Centre.'

Limerick City and County Council submitted a series of new and improved connections to improve permeability throughout Moyross including Sarsfield Gardens through the existing bridge underpass to Moyross Avenue,

access from Moyross to Cratloe Road, access from Moyross to Cratloe Road, LIT and the District Centre at Watch House Cross, Watchhouse Cross from Ballynanty and Eel's Weir to the New Road.

Along with wayfinding, the Shannon Chamber reiterated that the pedestrian environment be 'significantly enhanced, more attractive and safer than at present, particularly around key visitor attractions such as King John's Castle.' The nature of the environment was emphasised by NCBI who stated that 'it is vital that these changes are accessible.'

The Irish Georgian Society discussed the superblock concept in their submission, they described it as 'the basic idea behind the superblocks plan is to take urban surface space now devoted to one use (motor traffic) and open it up to multiple uses (walking, cycling, hanging out, what have you). This only way to do that is to restrict (but not exclude) vehicular traffic.' Liveable Limerick also discussed the superblock concept in their submission, they provided a bus system that showed how access could be retained to areas while also providing a superblock concept for a more desirable historic core to Limerick, they stated this concept could 'form the basis for reinventing the historic cove, delivering enjoyable public realm on streets like O'Connell Street, Roches Street, the riverside quays. Sarsfield Bridge and what we have in terms NewTown Park.'

12.2   Infrastructure

Several respondents submitted views on infrastructure for pedestrians. NCBI stated that it was 'in favour of universal design but does not recommend the use of shared space where pedestrians share the footpath with cyclists. It is essential to provide footpaths which are safe for pedestrians.' Cllr. Elena Secas stated that 'all walking and cycling routes must be connected and must be of high quality.'

Other submissions considered additional infrastructure. The Social Democrats stated that there were 'no meaningful plans for pedestrian infrastructure in villages.' The Shannon Chamber noted that the 1970s Shannon Town Amenity Plan provided for 150,000 trees and 15km of pathways through landscaped and green areas. The Chamber stated that 'this is existing infrastructure which can be updated, regenerated and further developed to provide the types of sustainable and people friendly walk and cycleways envisioned in the LSMATS for Shannon.'

The Green Party noted that the Strategy does not address the dominance of the private car and environment for pedestrians. The Party continued that, 'there is no mention of the many roads in the metropolitan area where footpaths are narrower than the 1.8m minimum width defined by DMURS [Design Manual for Urban Roads and Streets] as the minimum width for two narrow wheelchairs to pass each other, and the need for a comprehensive survey and urgent remediation of all roads that fall below this standard.'

The Shannon Group reiterated the aim within the LSMATS plan that it hoped to ensure high-quality public realm and streetscape design that is attractive, comfortable and accessible for all individuals and enhance the wayfinding systems in Limerick and other key destinations throughout the LSMA. They added the team should be particularly cognisant of facilitating improvements for the current pedestrian environment in the city. They stated that the key to improving the legibility and walkability of the city is the provision of an adequate map-based system as well as signage that would highlight accurate distances and times to destinations.

12.3   Permeability

Both the Southern Regional Assembly and the Green Party commented on permeability. The Assembly stated that the Strategy should include 'principles for enhanced permeability, integration of walking routes within road, bus and cycling network improvements, age friendly public realm, walking routes to school in addition to accessibility and universal design.' In addition, the Green Party noted that focus must be given to ensure permeability, making walking the fastest and most convenient option for short trips.

12.4   Accessibility

NCBI stated that the pedestrian environment must be accessible by all and emphasised the important role a footpath plays in a visually impaired person's life and the hazards if this is shared with cyclists. NCBI commented that, 'footpaths and public transport are their only options for independent travel. Footpaths must therefore be reserved as safe space for them, and for other vulnerable members of our communities.'

The National Disability Authority (NDA) requested that LSMATS follows the advice set out in the following publications by the NDA and Age Friendly Ireland: Building for Everyone: A Universal Design Approach and Being Age Friendly in the Public Realm: Guidelines and Good Practice. 'There is guidance in these publications

on designing fully accessible, safe and attractive pedestrian environments, suitable for all ages and abilities. The Authority also encourages the use of the walkability audit as a toll to ensure 'accessible for all individuals.'

The Shannon Group suggested that appropriate 'public realm along the Old Bunratty Road needs improvement including the upgrade of footpaths and crossing facilities.'

12.5   Response

The NTA notes the many issues that have been highlighted in the submissions in relation to the walking network in the LSMA. The strategy has set out the response to these issues by providing a framework for investing in improved infrastructure for pedestrians.

The superblock concept is noted and while elements of this are provided for by the LSMATS, an approach which seeks to pedestrianise large parts of the city centre is not supported at present due to its potential adverse impacts on the movement of public transport and cyclists, while potentially providing difficulties in managing access for people with disabilities and deliveries.

Linked to the above point, the NTA will seek to avoid scenarios where pedestrians and cyclists share space.

13.   Cycling

The Rehab Group noted, 'the provision of accessible bicycles and their parking facilities are incorporated into the Strategy to achieve the aim of providing cycling facilities for all individuals.' The Limerick Cycling Campaign stated, 'we welcome the majority of suggestions around the delivery of a primary and secondary network for cycling. This is well overdue.' IBEC stated that increased cycling would 'lead to more economic activity, reduced congestion, better air quality and an overall improved quality of life for residents and workers throughout the metropolitan area.' IBEC continued that 'the gradual reduction in on-street parking levels to facilitate cycle lane development and the commitment to expand bike share schemes will prove beneficial, helping to promote a cycling culture in Limerick.'

However, the Irish Cycling Advocacy Network proposed that a more ambitious target of 20% for cycling be set to comply with the 2009 National Cycle Policy Framework as rural areas have typically been lower than urban rates. The Network added that LMATS 'does not integrate cycling into its overarching strategy' and asked for this to be addressed as per 2018 in Sport Ireland's Get Ireland Cycling Policy Framework 4 amongst other documents. The Castleconnell Community Trust stated that without targets for cycling numbers it will be difficult to measure progress or success, 'increased kilometres of cycle-ways should not in itself be a goal. There needs to be a demonstrated need for and resulting utilisation of that investment.'

One respondent challenged the logic of the cycle and bus lane for Sarsfield Bridge, 'there are three bridges across the Shannon....Sarsfield Bridge and the Ennis Road should be a one-way system into the City and then Cyclists can be accommodated both ways, in and out.'

The Farrashone Residents Association called for a rethink on the plan for Bellfield Gardens, 'the majority of residents believe that if a plan to introduce a cycle-lane on Bellfield Gardens goes ahead that heavy traffic would be displaced onto already busy residential streets within our locality.' Another resident requested a cycle path for Corbally Road be incorporated.

The Mid-West National Road Design Office noted the stated vision for cycling in the strategy and stated that the N/M20 Cork to Limerick Road Improvement Scheme will assist with this vision. They stated, 'the Southern Environs will be a prime focus for growth in Limerick in the coming years and the N/M20 Cork to Limerick Road Improvement Scheme will be a foremost and positive development consideration in the future of the area.'

One respondent noted that there 'are over 6,000 students from primary and secondary schools as well as Mary Immaculate College attending institutions on this [South Circular Road (SCR)] stretch' and stated that a number of options are available to make SCR more cycle friendly. They gave specific details on unsegregated cycle lane at Ballinacurra to the roundabout at Fennessey's pub and a segregated cycle lane 'all the way from the roundabout past Mary Immaculate College down Henry St into Limerick city centre.'

Shannon Municipal District requested that the route from 'City Centre to Westbury and Ardnacrusha along the Corbally Road' be extended north to Barry's Cross.

One respondent stated the need for a primary route connecting City west to City centre, 'without the South Circular Road we lack the basic safe infrastructure to connect the communities of Limerick City West, Raheen Industrial Estate, University Hospital Limerick, key employers like the Crescent Shopping Centre, four secondary schools, eight primary schools and Mary Immaculate College to the city centre and beyond.' They also commented on the lack of key delivery times, 'under this plan there is no requirement to deliver even these basic primary routes before 2040.'

The Clancourt Group requested that 'the emerging Limerick/ Shannon Metropolitan Transport Strategy 2040 would consider further the provision of a local access route connecting the Rosbrien Road with the Doordoyle Road through the potential new development zone.' The Group stated that this new street would offer cyclists and others better local connectivity between the Rossbrien area and the shopping centre.

The Castleconnell Community Trust stated that 'a cycle-way / greenway along the Shannon would be an investment that would deliver in terms of recreation, safer travel for pedestrians and cyclists, and promotion of the river as a recreational amenity.'

The Housing Development Directorate with Limerick City and County Council submitted a number of suggestions for connections to improve permeability. These included:

- A safe pedestrian/cycle link from Sarsfield Gardens through the existing bridge underpass to Moyross Avenue;

- Upgrade Eel's Weir to provide a cycle, pedestrian and vehicular link to the New Road and beyond;

- Improved existing access from Moyross to Cratloe Road;

- Improved access from the Civic Heart of Moyross to Thomond Park/Cratloe Road;

- Provide a new connection between Moyross Avenue and Cratloe Road;

- Create a new connection between LIT and the District Centre at Watch House Cross; and

- Improved access to Watchouse Cross from Ballynanty.

Several submissions promoted the use of segregated cycle lanes. One respondent stated, 'the segregation of cycle traffic from motor traffic is absolutely fundamental in enabling people of all ages and abilities to cycle the proposed routes - painted lines on the road which mix motor traffic with cycle traffic is total unacceptable.' This respondent went on to detail recommendations for bus stops and junctions, recommending the Dutch style junction segregation. One individual commented that physically segregated bicycle lanes would deter illegal parking of motor cars on lanes.

A number of submissions mentioned children cycling to school with particular suggestions on routes. However, the Limerick Cycling Campaign focused on this stating, 'the number of children cycling to school has risen exponentially over the past 6 months and yet there is no mention of the unique opportunity this presents to move forward with the National Cycle Policy Framework 2009-2020, especially the commitment to ensuring all children have a safe cycle route to school.' The Campaign asked for specific targets and commitments to be given in the Strategy.

The EPA 'welcomed the extent to which cycling is being incorporated into the Strategy'. The Agency highlighted that appropriate environmental directives were adhered to when considering cycle-related infrastructure adjacent to and across the River Shannon. The EPA also acknowledged the proposal to identify a network of suitable quietways in the short to medium timeframe.

13.1   Network

Several respondents stated that cycling infrastructure was poor and 'lagging way behind on a national level and even more so on an international level.' Several submissions promoted good cycling infrastructure and networks as key in creating sustainable cities into the future. Other respondents gave examples of European cities where segregated safe cycle lanes have improved business in the areas. One respondent stated, 'dedicated cycle lanes linking every high street / cluster of shops and extending the bike scheme with more locations in residential areas would encourage people to use bikes instead of vehicles for short journeys', especially in the current situation when more people are spending time in suburbs and residential areas. The University of Limerick stated that cycling was being treated as a hobby and not a valuable mobility tool and therefore the Strategy was 'failing to meet the needs of a diverse range of cyclists.'

Deputy Maurice Quinlivan stated, 'a firmer commitment is needed within the document to the establishment of integrated cycle networks to, from and within Limerick City,' while Deputy Kieran O'Donnell supported the development of new network infrastructure.

The Shannon Chamber noted that 'cycling needs to be expanded beyond linkage to the road network'. The Chamber stated 'the potential to expand on the quiet and green area cycleways in Shannon using the existing path network and riverside amenities, exists' making it possible to cycle from Shannon Airport to Shannon Town. One business owner stated that a fourth bridge in Limerick city and a 'boardwalk style crossing suspended from the Shannon Bridge' would assist cyclists. The Green Party suggested that 'every educational facility, sporting facility, major employer, shopping centre, and public amenity needs to be connected to the network with a physically segregated cycle lane with a primary or secondary designation.' The Party objected to the inclusion of the Limerick Northern Distributor Road in the cycle network.

The Shannon Group proposed that the 'Strategy should incorporate additional cycle routes and cycle hubs across Shannon providing access to key employment areas and the extension of the Bicycle Sharing Scheme to key centres within Shannon.'

One respondent noted that the Ballyclough area currently has no dedicated cycling infrastructure nor is any provided for in the Strategy, stating it could be included 'by adding an additional cycle route to connect into the Southern Environ cycling green route.'

The Rehab Group welcomed the initiative to promote the cycling network in the Limerick – Shannon area. The Group stated however that 'no reference is made to how it will accommodate people with disabilities within this scheme' and requested 'accessible bicycles and facilities are incorporated into the Strategy'. The Rehab Group also suggested a physical marker to segregate footpaths from cycle lanes for the visually impaired and controlled crossing measures be implemented for 'pedestrians to cross cycle lanes safely, as this can be a hazard, and a deterrent, for some people with disabilities.'

A transport publication stated when cycle lanes filter along the route they give cyclists a 'dedicated and safe route to the city centre with the possibility of large cycle "parking" areas similar to those available in many European cities.'

13.2   Infrastructure

Several submissions had comments on the general nature of cycle infrastructure.

Cllr Elena Secas stated cycling networks are low cost short term/immediate interventions and must be connected and must be of high quality. Another respondent requested the completion of all Primary routes in the identified Cycle Network Study within the first year of implementation with a full rollout of the secondary and connecting routes by 2025. The Green Party noted that cycling infrastructure must cater for multiple users – cargo bikes, teenagers cycling in pairs, stating that 'cycling infrastructure should be developed in consultation with multiple users, especially women, so that selected routes will be safe and well used.'

IBEC made recommendations on 'the development of contraflow cycle lanes and cycle-only shortcuts, the trialling of continuous footpaths and cycle lanes where cars give way to cyclists and pedestrians, new measures to discourage dangerous parking in cycle lanes, and the removal and consolidation of street furniture/signage to create more space for pedestrians, especially those with mobility impairments.'

NCBI noted that if a cyclist does not feel safe on a road then they move to the footpath, making it less safe for pedestrians, stating 'when roads are unsafe for cyclists, they tend to move onto the footpath. This makes footpaths less safe for pedestrians. So, one problem is swapped for another.'

Other respondents had specific feedback on infrastructure development. Shannon Chamber stated that 'consideration should be given to continuing the cycle line along the riverside in Shannon and on to the airport, moving away from the road network to include green areas where there are existing pathways. There is also an opportunity to piggyback on the upcoming flood relief works. Shannon Chamber would recommend that this opportunity should not be missed.'

One respondent requested a cycle lane from the city centre to University Hospital. Clare PPN sought commitments on allocation of space for cycle lanes and provision in Park and Ride facilities for residential development, in particular between Mungret and the City Centre.

A property developer had specific recommendations; the designation of the disused Irish Cement railway from N69 (Mungret) to Rosbrien as a walking and cycling greenway route; greenway provision along with park and ride that provides cycling infrastructure and bicycle provision; and a primary cycling route between Mungret and the City to include the residential development.

13.3   Parking

A small number of submissions mentioned cycle parking in detail. Shannon Chamber stated that they would support a dockless bike system for Shannon and that 'the provision of long-stay parking and cycle parking hubs would be equally beneficial to Shannon, Shannon Free Zone and Shannon Airport.' The Green Party suggested that designated multi-storey car parks could be retrofitted to provide undercover bicycle parking, lockers and showers. The Irish Cycling Advocacy Network noted that 'development of a large secure bicycle parking garage in Colbert station [would be] suitable for parking of approximately 1,500 bicycles.'

13.4   Facilities

A small number of respondents focused on the facilities associated with cycling. The National Technology Park (NTP) requested information on supports 'to fit out business premises to facilitate active modes, covered cycle stands, changing facilities.' The Green Party stated that 'each major destination for cyclists will have to incorporate a number of bicycle stands and/or secure bike sheds commensurate with the ambition for the number of trips.' UL advised that the Strategy has not taken into consideration the evolution of the cyclist and the equipment such as assistive technology and e-bikes. 'High quality, secure cycle parking that is large enough for cargo bikes, trikes etc. are needed. In order to facilitate long trips by e-bikes access to charge points will be a necessity.'

13.5   Greenways

The Southern Regional Assembly was welcoming of the Strategy in relation to cycleways, especially greenway opportunities. Another submission stated, 'continue the excellent development of the high-grade walkways and cycle paths close to the river waterfronts. These give Limerick a unique sense of identity.' One respondent noted that greenways are a physically safe cycling route but 'must be coupled with routes that are accessible to all' and 'secure at all times of the day and night.'

Several submissions commented on specific greenway proposals. The Edwards Lifesciences/NTP traffic group requested 'early advancement of the greenway extending UL Greenway to the rear of the NTP and onwards to Annacotty.' The Shannon Foynes Port Company requested that any reference to a potential greenway on the railway or adjacent to the disused Limerick to Foynes Railway be removed 'having regard to the extent of preliminary work undertaken by SFPC and Irish Rail to date and the objective to open the line for rail freight in the future, commensurate with plans to expand the Port and grow tonnage throughout in Foynes.' The Port noted that this conflicts with the Strategy's own objective of potential for rail freight.

A respondent recommended the opening of the greenway along the disused Irish Cement railway line from Mungret into Colbert Station. The respondent stated, 'it has several existing and future residential areas; increasing the potential catchment of commuting and recreational cyclists; it requires no land acquisition; would have low environmental impacts and solves an anti-social problem on the rail line.

Shannon Group stated that 'the proposed greenway from Shannon to Limerick is recognised and welcomed by Shannon Group' but proposed a number of extensions to Bunratty, and secondary routes to Shannon.

One respondent praised the upgrade of the hiking trail from UL eastwards along the Shannon to a proper green route but requested the inclusion of the stretch along the Mulkear River and by UL Bohemians R.F.C. towards Annacotty.

Cllr Conor Sheehan stated that the Strategy 'should include a commitment to completing the proposed Greenway from Limerick to Scarriff, which is currently being designed, led by Waterways Ireland.' Cllr Sheehan also suggested that 'the Corbally side of the Abbey/Shannon bank to the end of the Mill Road needs to be significantly upgraded.'

The Shannon Municipal District Green Routes suggested that a greenway be extended to Shannon Airport and a second along the Owenagarney river route from Bunratty to Sixmilebridge.

13.6   Response

The NTA is of the view that the potential exists in the LSMA for cycling to be a significant mode of transport for all trip purposes and welcomes the manner in which the LSMATS has been commended in this regard.

In relation to trips to schools, while the draft report contained a section on school travel setting out a framework for cycling investment in and around schools in the LSMA, it is accepted that this section was not satisfactorily expressed. As such, this section has been augmented and moved to a more prominent location.

The NTA has reviewed all of the suggestions for additions to the Cycle Network Plan and has made a number of changes to reflect the submissions. Similarly, the supporting measures for cycling have been reviewed and while the vast majority of issues raised were covered in the draft strategy, additions have been made where deemed appropriate.

In relation to the crossing of the River Shannon in Limerick City, a new section has been added to the LSMATS to address the issues raised.

14. Bus

This section outlines topics raised in relation to the bus network, bus lanes, Sarsfield Bridge, frequency, interchange, tickets and fares and Limerick Urban Centre of Revitalisation of O'Connell Street.

14.1 Network

The Limerick Chamber stated that 'currently the draft LSMATS proposes using O'Connell street as the primary artery for several bus routes and specifies two bus lanes on O'Connell Street with a frequency of one bus every minute.' Limerick Chamber has significant concerns regarding the frequency of buses and their impact and suggested that O'Connell Street should be utilised in a different way. One submission referred to an article in the Limerick Leader newspaper in September 2020, regarding the provision of bus lanes along O'Connell Street. They stated that 'O'Connell Street is the principle street in Limerick city centre and its value has been hugely undermined by the continuous stream of traffic that currently flows through it. Cities are for people and it does not seem sensible to propagate this error through the replacement of a busy roadway with a large two-way bus corridor' and referenced the 'Superblock Plan' from the Limerick Leader article.

An individual expressed that for the new bus network to be successful, it ought to incorporate camera infrastructure into the design to ensure compliance and avoid illegal car usage. Better Ennis agreed, stating that LSMATS needs to include a strategy for dedicated bus lanes, including the use of a camera-based system to deter private car drivers from using bus lanes.

Night-time transport links being incorporated into the bus network was cited as being an item of high importance, allowing Limerick's night-time economy to grow and improve.

Shannon Chamber asked the Project Team to implement additional inter-regional bus services, namely between Shannon Airport and cities such as Galway and Cork. They also asked that the licencing of private operators operating on bus routes to be investigated. It was also noted that connectivity with the City Centre from areas such as UL and LIT was important as they strongly needed a reliable service. Park and Ride facilities for inter-city buses was also high on their agenda.

Deputy Maurice Quinlivan contended that LSMATS provided an opportunity to consider enhanced bus lanes and services in and out of the city from outlying towns such as Newport, Caherconlish and Murroe. The submission noted that 'such towns have many residents who work and socialise within Limerick City. With the current timetables from these locations, an over-dependence on private vehicle transport is inevitable.'

One individual expressed that prioritising a Trackless Tram service above general traffic is critical to the delivery of an efficient, frequent and reliable bus system and is a major part of the overall BusConnects programme.

It was also mentioned that two-way bus priority on O'Connell Street is not consistent with an Age-Friendly Town Centre. The submission explained that 'it will not encourage 35% greater footfall on O'Connell St. and it is certainly not what visitors or tourists will expect from our "Great Street".'

Direct and regular bus services from Limerick Bus Station to major employment hubs was cited as a priority that should be included in the plans for the network. The Limerick Green Party stated that six high frequency cross-city Limerick bus routes will be established.

One individual suggested that Ballyclough be included in the BusConnects network and within all future public transport plans.

Shannon Group welcomed the aims to improve local and regional bus connectivity to Shannon. They noted that the provision of additional services should be embedded as a specific policy objective 'which would copper-fasten their delivery in the short-term. We would encourage the NTA to expand upon Objective BC5 which states that "it is the intention of the NTA and the local authorities to maintain and enhance regional bus networks", by indicating a number of key direct routes, including but not limited to a direct services between Galway and Shannon Airport and Cork City and Shannon Airport. The Shannon Group cited the components within the BusConnects plans as mentioned in the strategy. They stated that ensuring that the public transport network can provide higher frequency services with shorter journey times and more direct services will be important to establish that bus services are considered a viable option for commuters. Shannon Group welcomed the inclusion of the above policy initiatives which facilitate enhanced connectivity between Limerick City and its suburbs to key employment centres, including Shannon Town, Shannon Free Zone, Shannon Airport, UL, LIT and Limerick City Centre and supported their delivery. The Shannon Group stated that the

'proposed 2040 Bus Network Map displayed in Chapter 8 of the Draft LSMATS, does not appear to include designated routes through the main employment centres within Shannon. In this regard Shannon Group strongly consider that the inclusion of these designated routes which provide enhanced connectivity to the main employment centres including, Shannon Airport and Shannon Free Zone is required, with their delivery facilitated in the short-term.'

One submission expressed concern that from a safety perspective, the bus network and cycle lanes must be segregated to ensure that people did not avoid cycling.

One submission proposed a high frequency circular bus route linking the city centre with Mungret, the proposed Park and Ride facility and the R510 via the Dock road corridor. They stated that 'given the funding prioritisation and development potential along corridor E, up to and including the residential development of the docks, the race course, the Bord Gais site, priority should be given more substantially to this corridor for the introduction of bus as well as cycle routes. In view of the higher densities that now need to be achieved in new residential development with lower car parking ratios, a greater degree of emphasis on the need for good bus services serving areas like Ballykeeffe, is justified.' They suggested that a high frequency bus route be developed linking Mungret to the City Centre.

One submission suggested that the route should be circular, stating that 'in other words all journeys would end at the station area and the city bus services would revolve around this terminus' saving significant time.

Bus Éireann explained that while the current bus network has delivered significant growth, it needs to grow further and adapt to the changing needs of the metropolitan area. Bus Éireann expressed that they 'fully support the BusConnects concept,' citing some of the core proposals within the strategy.

Limerick County Social Democrats stated that the strategy 'ignores the towns and villages that fall within the scope of the plan, regarding pedestrian infrastructure and bus and rail infrastructure.'

Deputy Kieran O'Donnell stated that effective and vibrant branding with regular advertising of available services was necessary to aid less frequent users.

One submission stated that as a matter of great urgency, an express service travelling from UL, to University Hospital Limerick (UHL), to Shannon Airport bypassing the city (via M7 & M18) should be implemented. They suggested that this should proceed as a trial starting in August 2021 'at the latest for a minimum of six months with wide scale advertising for at least six months before starting.'

IBEC stated that initiatives such as the roll-out of BusConnects across the city is important in regard to climate change. 'BusConnects will be a key pillar in the move to a sustainable transport network,' they stated. They explained that services need to be direct, frequent and reliable and need to coincide with flight times to help improve take-up of services at the airport.

An individual suggested the development of a modern bus based rapid transport vehicle 'similar to the Belfast Glider, working on cross city centre routes from the identified park and ride sites.'

Cllr. Tony O'Brien articulated that future and existing bus stops must be able to accommodate universal access.

14.2   Bus Lanes

One respondent requested the introduction of a Quality Bus Corridor from UL to the city allowing for a trackless tram system and detailed the benefits of this for Limerick. They also promoted Real Time Passenger Information and Integrated Ticketing as technologies to improve the customer experience with public transport.

A submission also suggested that LSMATS consider the allocation of road space in the Limerick Northern Distributor Road (LNDR) Plans for an Orbital quality bus corridor. However, they stated that this may not become necessary until a much later stage when the land within the LNDR is developed to an extent to which it can provide adequate patronage to sustain operation of such a route.

Another submission explained that the main railway line coming into Limerick city runs directly from the point where it comes under the M7 Motorway at Ballysimon, a distance of about 4kms. They stated that for most of this route there is space to add two road carriageways to run parallel with the railway. It was stated that this route could become a bus lane in and out of the city bringing both suburban, urban and intercity buses and coaches into the city having left the motorway from a dedicated new junction.

14.3   Sarsfield Bridge

Several respondents challenged the logic behind the Sarsfield Bridge plans. A taxi company said the removal of vehicular access is a worrying concept for taxi drivers, particularly that they may not be allowed to use bus lanes in the future. They also mentioned that the bridge's partial closure during the pandemic created frustration for locals. Another submission stated that the short and medium impacts of closures to Sarsfield Bridge should be clearly articulated and any impact to the surrounding road network suitably assessed and addressed.

However, the Limerick Green Party stated that the concept for the bridge should be kept, stating that consideration for a signalled lane system for buses to allow for more space for active modes of transport should be allocated.

14.4   Frequency

An increased timetable and improved routes were cited as a contributory factor in reducing a dependence on private vehicle travel. The Shannon Group said that in order to promote using the bus over private car, a higher frequency and more efficient service is required.

Deputy Maurice Quinlivan stated that there is a lack of public transport in Shannon and the Clare region generally. The timetables at present were cited as infrequent and needed to be improved upon to accommodate school drop offs and other similar journeys.

It was stated that Limerick buses are forced to cater for a variety of commuters including workers, students and airport passengers. An Taisce stated that 'services between the City's train and bus hub and what aims to be an international airport should be high speed, frequent and non-stop and should align fully with early and late air departures.'

One submission expressed that agreement with TII will be required on infrastructural changes such as bus gates, protected laybys and bus priority at signalised junctions as a means of prioritising bus services above general traffic. They explained that these improvements will lead to a significant improvement in punctuality and bus journey time reliability.

It was noted in one submission that the Bus Éireann app is inaccurate at predicting infrequent bus arrivals and in some cases young women may feel unsafe on the bus. This submission suggested sheltered bus stops and live digital updates for bus arrivals.

The Limerick Green Party suggested a frequency of less than ten minutes between buses from 6am until 12am, seven days a week and to implement a high-frequency bus system like the Luas. They explained that all six routes will have priority access along these where possible through the reallocation of road space leading to the bus having the highest average speed of all modes of transport with the exception of rail. In addition to this, they stated that feeder services will be established to connect with the six high-frequency routes where necessary.

Deputy Kieran O'Donnell explained that there should be an improvement on punctuality of services 'based on strong service level agreements with operations, on board facilities and direct routes with ease of access and travel comfort.'

14.5   Interchange

Clare PPN noted that there are huge opportunities for a 'hop on hop off style' bus route in the rural areas of this plan. Clare PPN considered that BusConnects should investigate the possibilities of utilising minivans or electric vehicles.

The Limerick Green Party stated that O'Connell Street should not be the main artery for buses through the city centre. They explained that private buses should link with the public bus network at Colbert Station and suitable facilities should be provided for them. They stated that 'there is poor interchange in the proposed bus network. Easy and convenient transfer between routes is vital to gain from network efficiencies and to make journeys between any two points in the network possible. The proposed bus network also does not integrate well with other public transport services.'

14.6   Tickets and Fares

One submission called for a transport system that integrated tap payments or weekly, monthly, or yearly subscription rates with discounts for workers.

Ennis Municipal District suggested similar pricing to Dublin for integrated tickets.

Deputy Maurice Quinlivan stated that travelling between Limerick and Shannon by bus costs over €11, with private bus companies charging the same to travel to Dublin.

One submission suggested that fares should be easy to use, regionally integrated, designed to provide price incentives for more frequent use, and affordably priced to make transit an attractive alternative to the private car. This individual stated that 'fares restructuring will need to be undertaken with the NTA to ensure that the fare system aligns with the new Trackless Tram route system.' It was suggested that a zone-based approach would allow individuals to take multiple journeys on the same fare.

The Limerick Green Party stated that ticketing should be cheap and intuitive. 'One fare should cover the entire metropolitan area for a ninety-minute journey.' They also stated that services should be progressively upgraded to Bus Rapid Transit standards, with dedicated lanes, off-board fare collection, smart card validation, step-free boarding, and high-quality stops.

14.7   Limerick Urban Centre of Revitalisation of O' Connell Street (LUCROC)

The Limerick Chamber stated that the Limerick Urban Centre of Revitalisation of O' Connell Street (LUROC) 'multi-million-euro investment in public realm improvements' on O'Connell Street with the aims of creating ambience in the city centre and enhancing citizen and visitor experience and enjoyment of the Georgian architecture, would 'be undermined by high volume bus traffic.' They requested that more appropriate streets with lower historical value and less significant retail offering be identified for use as the primary bus corridor for the strategy.

Limerick Chamber supported the LUCROC project and the pedestrian priority of our premier Georgian and retail street in the city centre. The Chamber was supportive of the removal of high volume, high speed transit traffic from O'Connell Street and was supportive of prioritising public transport while ensuring low level access for private car trips where the city centre is the end destination. They explained that currently the draft LSMATS proposes using O'Connell Street as the primary artery for several bus routes and specifies two bus lanes on O'Connell Street with a frequency of one bus every minute. They had concerns regarding the impact of the proposed density of buses on O'Connell Street.

The Irish Georgian Society said that a two-way transport corridor on O'Connell Street would see double decker buses passing every minute. They stated that this level of frequency would be 'catastrophic' to the street and its public realm due to noise and air pollution levels. They also proposed an alternative street for the diversion of main traffic to ensure heritage and cultural protection of O'Connell Street.

One submission expressed that in cooperation with BusConnects this strategy includes plans for continuous bus lanes and bus priority on all key public transport approaches to the City Centre, as well as increased bus lanes and priority through the City Centre in addition to the bus lane measures included in the O'Connell Street Revitalisation Plan.

14.8   Response

The NTA welcomes the positive feedback on the overall thrust of the bus proposals within the LSMATS and has made some minor changes to the bus section to address issues raised. The Bus chapter has also been restructured in order to provide greater clarity.

In relation to the LUCROC scheme, the NTA position remains as set out on page 53 of the draft LSMATS. This position is that, with the information available at this point, O'Connell Street is the preferred option for Limerick's main public transport spine for both services and for bus priority measures. The NTA proposes to re-examine the bus service network in detail as part of a BusConnects Limerick programme.

With regard to Sarsfield Bridge, as the primary crossing on the strategic public transport route from the northwest suburbs; Ennis and Shannon Airport and Free Zone, to the centre of Limerick and onwards to Colbert

station, the NTA is of the view that buses should not remain vulnerable to delays caused by private car traffic. As such, given the presence of three other crossings for private car, including a motorway linking Clare to south and east Limerick, and Tipperary, it is appropriate and desirable from an economic and environmental point of view to seek the dedication of Sarsfield Bridge to sustainable modes and taxis. A full assessment of the potential impacts of this will be undertaken as part of the design and planning of the scheme to provide full bus priority on the Ennis Road from Limerick City Centre.

The NTA notes the many comments related to services, ticketing, fares and the overall customer interface. LSMATS provides the framework for on-going enhancements to all of these aspects of the bus network. Significant enhancements have been announced since the publication of the draft LSMATS, such as the doubling of the frequency of the 303 service. These enhancements will continue to be rolled out, as will improvements to the supporting infrastructure, such as bus stops and real time information. A comprehensive package of improvements to Limerick's bus service offer will be developed under the "BusConnects Limerick" umbrella immediately after the finalisation of the LSMATS.

15. Rail

This section outlines topics relating to rail, network, stations, frequency, facilities , the rail spur to Shannon and the Light Rail.

15.1 General

Feedback received in relation to rail included criteria of transport hubs, freight logistics, lack of ambition regarding a rail strategy, environmental impacts, and heritage links.

Regarding Tipperary Town, Tipperary County Council suggested 'the proposal for a dual rail line to Limerick and the potential of Limerick Junction as a freight hub, together with the N24 running through the Town.' Another stakeholder suggested that trains should run directly to Waterford which would offer great services to those in the south and freight services.

Tipperary County Council noted that the potential for Limerick Junction rail freight logistics is excluded from objective RL6 and FDS3 of LSMATS. They asked why there is 'no mention of the potential of rail freight to Rosslare and access to European and UK markets.' Better Ennis also expanded on freight strategy and asked for more information 'outlining the potential of connecting up with Waterford and the Western Rail Corridor and that the focus and prioritisation should favour rail over road connections from the port.'

Fine Gael Councillors of Limerick City noted that LSMATS 'lacked ambition for increased rail' and 'the rail proposals show no planning for a future Limerick of 300,000 with development only to be concentrated around the enhancement of existing regional connectivity with no plans for additional regional connectivity.' Shannon Municipal District Office noted that the 'LSMATS prioritised bus, cycle, and walking routes, while rail links have been underestimated.' They continued to add that a, 'LSMATS that does not have full regard to the future potential of rail will place significant pressure on the preserved routes in the county development plan as the argument for their retention will be weakened.'

One respondent added, 'the overarching objective of the LSMA's rail network is to maximise development opportunities offered by the existing railway corridors to support a greater level of coordination between land use and transport planning.' They continued, 'the strategy should reflect the announcement by the Minister for Transport on 24th September 2020 in the Dáil, that he will support and seek funds to reopen the Limerick-Foynes line for freight…there is the potential for several stations in the medium to long term at Dooradoyle, Raheen, Patrickswell (serving the racecourse as well) and Adare.'

Limerick Greens commented, 'LSMATS mostly ignores the potential of rail to efficiently move significant numbers of people around the metropolitan area. We believe it should be the centrepiece of mass transit in the metropolitan area, and rather than pointing out that Transport Oriented Development does not exist, we believe LSMATS should mandate that Transport Oriented Development should take place and describe how an electrified suburban rail network can serve areas zoned for high density.' They also noted that 'the potential for regional connectivity is overlooked in the strategy and in particular the capacity for improved higher speed rail to link Limerick with Galway, Cork, and North and South Tipperary should have been included.'

Liveable Limerick noted rail is dismissed based on modelling and they find this assessment questionable, especially as the coverage is unparalleled especially when connecting freight ports and other cities. Liveable Limerick raised that there is an existing bias for car travel, however, if an efficient rail network was in city-centre locations this would make rail use far more attractive. Liveable Limerick questioned 'the dismissal of the role of rail in a city of 150,000 people.' And continued, 'we have tried to interrogate this at public consultation meetings, to understand why Limerick is different to the other cities with rail transport, only to be told that was what the model determined.' One respondent added 'the existing draft study, as currently written, fails to maximise the potential of rail in the strategy. This is partly down to how the modelling for rail was done in the Transport Options and Network Development Report of June 2020 and looks at rail only in the context of corridors directly connecting the city centre and not holistically in the context of the overall existing rail network and its potential.' They continued, 'from a rail perspective, the LSMATS is geographically a too narrowly defined area. It's fine for the bus, walking, and cycling, but not heavy rail. This has to be looked at holistically in terms of rail and how services will be operated. For example, the strategy ignores the potential of the Limerick Ballybrophy line (a railway with a poor and stagnant set of services offered by IE/NTA). The base timetable has not changed in over 50 years, except for a single morning commuter service reintroduced a few years back with an evening return service that departs at 16:50, making the line unattractive/unfeasible to use for local commuting.'

Limerick Chamber commented on the benefits of rail regarding the impact on the environment and quoted the Government's Climate Action and Environment policy. The policy stated that rail is 'already less polluting than other modes of transport and, being electricity-based, are more cost-effective than other options and are far more adaptable to renewable energy sources that are becoming more prevalent in the energy market. The ratio of CO_2 emissions per passenger compared to other modes of transport is significantly lower than motorised transport.' Limerick Chamber noted that the LSMATS dismisses rail as an option for the development of Limerick, 'this is surprising considering that a significant (underutilised) rail infrastructure system already exists in the region.'

Shannon Municipal District Office commented on the importance of rail links to heritage sites, 'it is further noted in the MD that Bunratty Castle with the richness of heritage and tourism potential should be serviced by rail and connected to Ennis, Shannon, and Limerick.'

One individual suggested considering tram-trains, trams that run on both heavy rail and their own light rail as used in Europe and gave details on potential routes.

15.2   Network

Many respondents spoke of connecting rail lines. One commented on the Limerick to Waterford line, stating they 'welcome the proposal to double the line to Limerick Junction. This line also has two services each way daily, however 'these do not encourage rail travel as the timetables are not very customer orientated.'

One respondent requested a double connector line just after Castleconnell connecting to the Ennis Limerick Line. They proposed it would serve UL and 'remove over 20,000 cars from the road daily. Nenagh and Roscrea would now benefit greatly as they would become satellite towns of the university and would/could have students commuting by rail from them.' One respondent commented on the double-track reflected in corridors A, B, and C and noted that this technique is not used within F, D, and E. They added, 'this is flawed, as it rules out the potential of what heavy rail could deliver.' The respondent also noted the strategy is not clear regarding KPIs. These KPIs could be double-tracking all routes or signalling each route with passing loops to ensure peak hour service of trains every 30 minutes. This stakeholder also commented on the Killoran to Limerick Junction which Iarnród Éireann intended to restore the double track. Restoring this line would 'allow more operational flexibility, cutting journey times and making the introduction of a Limerick to Cork direct service easier,' according to the submission. This respondent also noted that the strategy requires a 'strong emphasis on the need to develop regional rail as part of the InterCity network as a key part of the strategy.'

Labour representative Cllr Conor Sheehan commented 'it is disappointing that there are few definite commitments when it comes to rail developments. The absence of any reference to a rail spur rail Limerick/Galway line to Shannon Airport is a major omission in our view. A shuttle bus from Sixmilebridge, while it may be a short-term option, should not preclude planning for a rail link. Shannon Airport is a key driver of opportunity, jobs and connectivity for the West and Midwest and it is essential that Transportation policy is as ambitious for Shannon as for Dublin Airport.' He continued, 'the National Development Plan rightly aims to re-balance the Country, which is currently skewed in favour of the East, particularly the Dublin region. This will simply not happen without specific measures, including practical support towards the future viability and growth of Shannon Airport including connectivity to road and rail networks. The crisis that now faces Shannon Airport as international travel has ground to a halt demands radical action.'

One respondent commented that 'double track as a key requirement skews the business case. On the Limerick, Ennis corridor Iarnród Éireann aspires to run an hourly service with a half-hourly peak service using new stations at Parkway, Moyross, and Cratloe. These objectives should be supported and delivered at the earliest opportunity.'

Limerick Greens also commented on the Limerick to Waterford line and asked for 'an appropriate timetable and with park and ride stations established at Limerick Junction, Oola, Pallasgreen, and Ballysimon.' Cllr Conor Sheehan also noted, 'the Limerick/Galway line also has the potential to provide rail access to the City Centre from Moyross and Corbally. Suburban rail options for commuting into the City Centre should, in our view, be seriously examined with feasibility studies in the early stages of the plan. The Ballybrophy line should be included with a possible station at Annacotty (there used to be one to service Ferenka) and another station at the Ballysimon Junction to facilitate parking and ride access at this major intersection. The advantage of having extensive corridors of rail routes already in the ownership of Iarnród Eireann is unique to Limerick and can potentially save both money and disruption as there is already an existing right of way surrounding the city.'

Cllr Sheehan continued 'There is an extensive current disused rail network, particularly on the western side of the city travels from Mungret through Dooradoyle, Ballykeeffe, and Kilteragh estate before crossing over the

Childer's Road on route to Colbert Station. Limerick and suburban areas like Mungret are expanding in terms of both job creation and housing developments and with over 40 percent of our population under 35 years of age, we need to put new infrastructure in place to cater for future transport demands and this should be reflected within the strategy.'

Iarnród Éireann noted, 'heavy rail can play an important role in supporting the sustainable growth and prosperity of the LSMA, and by extension the Mid-West Region.' They continued to comment on the benefits that expansion of heavy rail would produce such as 'maximising the use of the existing railway network and assets in the Limerick Area.' Iarnród Éireann added, 'in terms of these heavy rail expansion opportunities and how they would align with the draft LSMATS wider public transport objectives; the BusConnects programme for the LSMA will be complemented in tandem with an incremental improvement to rail services over the period to 2040 and beyond. The bus will have a major role in any mobility system, and there would be no exception here. The rail elements of LSMATS, in terms of improving interregional and intercity connectivity, would be complemented and supported by these rail expansion opportunities.'

Iarnród Éireann welcomed the involvement alongside 'the National Transport Authority, Bus Éireann, and Limerick City and County Council in developing an integrated hub at Colbert Station. An improved multimodal public transport hub at Colbert Station is at the heart of a sustainable transport policy for the LSMA. The overall objective of the Colbert Station project is to enhance and develop the existing passenger facilities at Colbert Station, to improve intermodal transfer between rail, bus, taxi, private vehicles, bicycles, and pedestrians, and to improve accessibility between the station and the city centre. It will greatly enhance the customer experience in the concourse and when using the public facilities while also increasing the capacity at the bus station including car parking spaces.' Iarnród Éireann welcomed the Department of Transport's decision to conduct a feasibility study looking into higher-speed rail services.

Iarnród Éireann noted that the medium- and long-term future of the LSMA's transport requirements could be 'met through the concept of a rail based high-quality North-South Commuter service, delivered over time. This will connect all areas of Limerick City and extending the reach of rail through high-quality suburban rail services over our existing and currently disused lines, with Colbert Station Integrated Transport Hub at its centre.' They also stated that 'providing sustainable mobility to key facilities and communities through the LSMA will be a central part of this rail commuter plan.'

One respondent commented, 'consideration should also be given to the restoration of the direct curve allowing any potential commuter services from the Foynes/Castlemungret to access the station directly. Provision should be made for its reinstatement in any potential redevelopment of the area.'

One individual commented on the Limerick to Ballybrophy line. They noted that this line had limited investment and no ticket machines at the stations. They continued to say 'it is simply a rail connection of two lines. The line has low usage, poor service, and very very slow speeds.' Tipperary County Council also commented on the upgrade to the Ballybrophy line and the Limerick Waterford rail line, they noted that long- and medium-term priorities for this line were not mentioned. They also requested an upgrade to the 'Ballycar rail line to alleviate flooding.' Castleconnell Community Trust also commented on the Ballybrophy line, 'opportunity exists to leverage the existing Limerick to Ballybrophy line by adding services that connect passengers with their destinations at times that work: arriving into the city in time for the working day and leaving at the end of the working day.' Castleconnell Community Trust also stated that additional services during the day would promote local businesses and connectivity within Limerick and Nenagh.

UL welcomed most proposals however recommended 'the train station at Lisnagry be cited as a" disembark and ride" facility for passengers from the Midlands accessing UL and the National Technology Park. 'UL also requested a new Ennis to Galway line based at the Rhebogue campus. They noted that this would serve their current campus and planned Strategic Development Zone (SDZ), which 'would provide the certainty of commuter travel times currently missing from the bus transport proposals mentioned above.'

One respondent commented on the Foynes to Limerick line and noted that the Ryder Cup in 2026 is the 'opportune time to reopen this vital connection.' They added, 'the line services Adare and the line should open to serve Adare Askeaton and Foynes. An opened line would leave a legacy of good infrastructure for the freight and tourism long after the Ryder cup has gone.' This respondent added that Raheen has a large population and a rail stop there could remove many cars from the roads. There was a request for the current lines ending at Rosbrien to be doubled and extended as far as Adare to accommodate those visiting for the Ryder Cup.

Sinn Féin noted that they were content for the rail line passing through Moyross to 'be made operational… the creation of a two-way line to the city from this location would open the area up to commercial investment opportunities. This location is also within a short walking distance of Thomond Park and could serve large

numbers of commuters, particularly during the sporting occasion. The opening of a railway from Moyross in conjunction with the development of the Coonagh/Knockalisheen Road, which is presently under construction, would allow for ease of access to and from this location to many parts of the city.' Sinn Féin also expressed an interest in upgrading the Galway/Ennis line as a priority to connect County Clare, 'with the Expressway Bus Route having been cut, the upgrading of this line could allow for the transportation route with Galway to be maintained.' They added that the above routes should be utilised with additional stops as a means to reduce car transport.

One individual commented 'a service could be provided from Adare to Ennis, with new stations at Patrickswell, Dooradolye, Parkway, Moyross, and Cratloe (P&R), making use of the currently disused Foynes line and the active Ennis line. Whilst a second service could run from the Father Russel Road to Roscrea, with new stations at the Crescent SC and Ballysimon Road (P&R), making use of the disused line to the Irish Cement factory and the active Roscrea line. An extension of the line to include a stop at Mungret could also be included.'

Sinn Féin commented, 'we contend that the LSMATS document fails to consider the viability of an intra-county rail network. There is in place the foundations of an intra-county rail network.'

15.3   Stations

One individual commented that cargo trains running between Mayo and Waterford cause gridlock in Kildare. This respondent proposed 'developments in rail further up the coast around Galway (double lining Athenry to Galway, proposed opening of the western rail corridor to Claremorris junction and mayo) these trains carrying vital cargo could be moved through the junction and onto their destination in Waterford far more efficiently in both timing and for the environment.'

Tipperary County Council noted that objective RL7 is to 'enhance the attractiveness and efficiency of LSMA rail services through improvements to Sixmilebridge, and Castleconnell and Birdhill stations, signalling improvements and completing the National Train Control Centre.' However, they commented, 'there is no mention of Birdhill train station in the document. This station lies just outside the LSMA and is an existing strategic asset to the MASP.'

Some respondents commented on increased connectivity. Councillor Frankie Daly from Limerick City and County Council noted this increased connectivity to the suburbs would increase access to education, work, and health services alongside 'quick access into the heart of Limerick City.' Councillor Frankie Daly also commented on Moyross station, 'This station would be a huge vote of confidence in Moyross and its future has given potential employers reasons to establish businesses in this area and create local jobs and jobs that people outside the area could also access by rail, allowing Moyross to grow as a business and residential area beside LIT.'

15.4   Frequency

Sinn Féin commented on the frequency of rail, 'the current weekday timetable is not suitable for those who would wish to commute to work in Limerick City.' Sinn Féin particularly focused on the Castleconnell station line into Limerick City. They stated that these times are not in line with the average working day. The 'timetable should both be expanded and revised' accordingly, which would encourage more to use the public transport system. Limerick Greens also commented, 'level crossings will be eliminated on all rail lines coming out of Limerick and passing loops will be established on single-track lines to increase frequency.'

Cllr Conor Sheehan commented, 'the current plan should address the issue with regards to inadequate/limited timetables, plans/objective for a stop for UL passengers in Castletroy, and to promote the use of this valuable rail link between Limerick and North Tipperary.'

North Tipperary Community Rail Partnership implied that the current objective RL4 ignores the line's potential. They suggested that realigning the existing timetable, for Nenagh-Limerick, and adding additional mid-day services will open up journey opportunities. They continued, 'the line will present more commuting opportunities and encourage more modal shift and become more attractive to use. Long-term aspirations should be to deliver a 2-hourly service throughout the day, with an hourly service to Nenagh in the morning and evening peaks – this creates new commuting opportunities from Castleconnell, Birdhill, and Nenagh, alongside an Annacotty park and ride station.'

Tipperary County Council noted the need for a 'review to examine the improvements in journey times and investment in high-speed rail between Belfast, Dublin, Limerick Junction, and Cork.'

15.5   Facilities

One respondent commented that an electrified rail should be provided 'especially the Foynes line (serving Dooradoyle, Patrickswell, an N20/N21 Park and Ride, Adare, Askeaton, and Foynes) and a spur to Shannon (possibly serving Bunratty).' Another individual commented on an electrified high-speed service, 'This is where the strategy is severely lacking - vision is not considered sufficiently!'

The National Disability Authority (NDA) also noted the requirement to develop an effective ticketing service for rail users. The NDA commented this is a requirement to aid the success of enhanced rail facilities. One individual also commented on ticketing, noting that daily and weekly LEAP fare caps should be introduced along with tax savers tickets and cheaper suburban zone fares. They continued that LEAP would 'allow integrated travel with city bus services, either through a discount on the second fare or as planned for Dublin, a time-based single ticket, allowing onward travel within the city. Many journeys don't end near the city rail station, and integration with local buses is essential. North Tipperary Community Rail Partnership commented, 'objective RL7, needs to see smart ticketing and passenger information systems rolled out on all lines serving the LSMATS area. Currently, there is no real time information being provided to passengers waiting for services on the Limerick to Ballybrophy line.'

Many respondents commented on improvements to services. One respondent commented on the improvement of passenger information systems, 'currently, where rail network stations are provided, passenger information screens are outdated and very limited in the information they provide.' They continued to add that real-time information should be provided. The NDA welcomed the enhancements to existing railways and asked for more provision to create 'fully accessible [transport] for those with reduced mobility, wheelchairs, or buggies' and provision of 'comfortable, sheltered waiting areas for passengers;' and 'accurate Real-Time Passenger Information (RTPI) for both trains and connecting buses. These measures will enhance the travel experiences of persons with disabilities.'

Another respondent commented on signalling improvements, stating that LSMATS needs 'to recognise the urgent need for the Killonan to Ballybrophy section to have modern signalling. This is a key requirement to allow the successful delivery of any enhanced commuter rail.' In turn, they noted that this would cut costs and provide an improved faster service. They also noted that this enhancement would require passing loops 'between Limerick-Ennis to allow for the growth of passenger services and the reintroduction of more freight services as part of the current government's strategy to increase rail freight.' North Tipperary Community Rail Partnership also commented on the need for 'Killonan to Ballybrophy section to have modern signalling.'

North Tipperary Community Rail Partnership commented on a greater need for bus and rail integration, 'there should be services connecting Birdhill with Killaloe-Ballina.' They also noted 'the urgent need to fund and convert the existing 11 manually controlled level crossing to fully automatic level crossings controlled from Mallow signalling centre. This will cut the operational day to day cost of the line in the medium to long term, offering more operational flexibility and making it easier to improve line speeds, cut journey times and introduce more services.' North Tipperary Community Rail Partnership also noted that the programme on the replace jointed tracks to CWR tracks should be accelerated to aid in faster services.'

Sinn Féin noted if inter-county travel is to occur remedial works will need to be completed in Ballycar. This line can close due to flooding, 'the state needs to take charge and invest the funds that will remedy this flooding issue. Without this commitment, the line will remain underused.'

15.6   Rail Spur to Shannon

Many respondents commented on connectivity to Shannon Town. Shannon Chamber suggested a shuttle bus to increase the connectivity between Sixmilebridge to Shannon. They stated that 'circa 40% of [Sixmilebridge] population (6,000 – 7,000) commute to Shannon daily between schools and work'. Clare PPN commented that the LSMATS failed to include the need for a rail spur 'serviced by frequent commuter trains of the Limerick – Galway line to Shannon Town, Industrial Estate and Airport.'

Better Ennis commented on a rail spur 'the main Galway to Limerick line to service Shannon Town, Industrial Estate and Airport. Frequent direct rail services need to run between Shannon, Limerick, Ennis and beyond to Galway, Dublin, Cork, and Waterford.' They requested a rail spur along with the Galway to Limerick line via Shannon town, the industrial estate, and the airport, 'to address the poor connectivity for the large workforce at the industrial estate and those using Shannon Airport for both business and tourism connectivity' and reducing traffic congestion within Ennis and Shannon.

Some respondents also requested a link to Shannon airport. Edwards Lifesciences/National Technology Park traffic group suggested there should be a 'rail connection to Shannon Airport to complement parallel direct bus connectivity.' One individual added that linking Limerick City and Shannon Airport (via Sixmilebridge) would enhance County Clare. They continued, by including this link it would 'enhance the attractiveness of the Limerick Shannon Metropolitan Area as a location for foreign direct investment and tourism and provide a direct rail link to transport networks within the Limerick Metropolitan Area.' This link would also connect the Limerick Institute of Technology, Raheen Industrial Park, the University of Limerick, and the IDA national technology park. Another individual commented, 'better rail links would also be very valuable and a Limerick Shannon line and improved rail connections to Ennis and Galway could be blended into this larger-scale plan.' An Taisce commented, 'In the longer term the oft-mooted proposal for a rapid rail link between city and airport should be given full consideration. However, it must be noted that the state continues to support and subsidise competing airports in Kerry and Mayo as well as other policies that serve to undermine any goal of developing Shannon as a major transport hub.' Edwards Lifesciences/National Technology Park traffic group noted that the rail connection to Shannon airport should also have a parallel bus service. They also requested 'improved Rail/ Road connections to Dublin, Cork (incl. the N/M20 scheme) and the new road link to Foynes Port (the Foynes Adare Limerick Road Scheme).'

Limerick City and County Council also commented on the LSMATS proposal and the lack of connection to 'Shannon Airport, or improvement of services and timings through Castleconnell Station for commuting to work in the city, or indeed from Nenagh and Birdhill, or any additions of the Ennis line at Moyross or Cratloe, or the development of our present rail links into and around the environs of Limerick City.' Limerick Chamber had similar comments and requested a more detailed analysis of the rail options for Limerick including the potential for a rail spur to Shannon Airport and additional stops on the Limerick to Ennis Line at the Parkway, Moyross, and Cratloe' be undertaken. Another respondent requested a rail link between Ennis rail line and Shannon Airport.

Many respondents suggested improving connectivity within LSMATS. Iarnród Éireann proposed a rail service connecting North and South Limerick, suggesting that the Shannon Free Zone and Shannon International Airport along this link could be the 'central spine for a future integrated sustainable transport network for the LSMA.' One individual added that the Limerick to Foynes line should also be reinstated, 'to link Ireland's deepest port to the national rail network and connect key towns such as Askeaton, Patrickswell, and Adare to Limerick City Centre, and onwards to Ennis and Galway via new stations at the Parkway.'

15.7   Light Rail

Several submissions contained requests for a light rail as part of the Strategy. Cllr Olivia O'Sullivan stated that by not including a light rail showed a lack of ambition and indicated the 'plan is to deliver a strategy within budget rather than a strategy that will meet our needs by 2040.' UL stated that a light rail be looked at if certainty with respect to transport times cannot be guaranteed. One respondent gave a detailed submission on four termini connecting the city for a light rail.

The Labour Party queried why no reference to light rail was included in the Strategy, stating that Limerick was unique in having a regional rail network modally linked to Colbert Station with the 'potential to be developed for extensive suburban connectivity with a network of accompanying suburban stations.' One respondent stated that 'the long-term goal of LSMATS should be the development of a comprehensive Light Rail Network.' They continued that the network would connect six high density residential areas to the city centre. They conceded that light rail is not viable with population numbers now 'but if you review the projection population then this is a simple future proofing of the area.' A submission from a property developer also mentioned light rail, requesting that the Strategy look further into a rail link from Limerick to Shannon airport.

15.8   Response

In preparing the draft LSMATS, the NTA examined the viability of a comprehensive suburban rail network for the LSMA, and its potential impact on mode share. This was set out in detail in the supporting reports and summarised in the draft LSMATS main report. Such a rail system, when appraised at a strategic high level, was found to be of limited benefit to the people of Limerick or South Clare.

The focus of the original draft LSMATS was therefore on the bus and cycling as the main modes to change transport culture in the LSMA and meet environmental obligations.

In the period since the publication of the draft LMATS and in the interests of demonstrating a holistic approach to the strategy, the NTA, with the cooperation of Irish Rail, have developed and assessed a more focused and

ambitious rail system than had been considered to date, with a view to achieving much greater benefits than the previously proposed network. In testing this network, the NTA sought to explore which sections of a comprehensive rail system could be realistically brought forward as part of the LSMATS in the period up to 2040 and beyond to 2070. The latter year has been examined with land use patterns optimised to focus development on potential new rail stations.

While the outcome of this assessment, published in the accompanying Rail Strategy Report, clearly highlights the challenges in providing such investment, the revised LSMATS sets out a path towards an enhanced rail system for the LSMA.

In relation to Light Rail, the outcome of the initial assessment of travel demand, and a high-level estimation of its cost, indicated that there was insufficient demand to justify investment in a tram system in Limerick.

16. Parking

This chapter outlines submissions regarding parking. Topics within this chapter include Park and Rides and on-street parking. Overall, 50 respondents commented under this theme.

16.1 Park and Ride

Topics covered include lack of current Park and Ride facilities, traffic reduction, alternative solutions to Park and Ride, suggested locations for Park and Ride facilities, and improvement to connectivity.

Some respondents commented on the current lack of Park and Ride facilities and welcomed suggestions in the strategy. Tipperary County Council commented, 'at present, there are no dedicated, permanent Park and Ride facilities within the LSMA or its catchment. The Strategy will address this shortfall. Strategic P&Rs will be expected to cater for between 400-600 car parking spaces and in all cases, be supported by reliable, high-frequency bus services and a potential new rail station at Ballysimon. Expansion of PNR facilities at existing train stations should also be examined.'

Tipperary County Council continued, 'the suggestion of a Park and Ride facility at the M7 Newport Roundabout is welcomed. However, Tipperary County Council would request that consideration is given to constructing a train station at this location also (similar to the proposal for Ballysimon). This would greatly increase the use of the Limerick-Ballybrophy Train Line, as it would provide a connection to the University of Limerick and Plassey National Technological Park.' In addition, Limerick City and County Council commented, 'the draft strategy highlights that there are no dedicated permanent Park and Ride facilities within the LSMA. With projected population growth of 50,000-55,000 persons in Limerick City and Suburbs within the next 20 years, it is clear that such infrastructure will be both feasible and necessary to tackle traffic congestion and associated environmental pollution. The key to the success of this is intermodal urban mobility and providing efficiency in associated public transport transit.' Limerick City and County Council continued to name Raheen (M20/N21) and Ballysimon (N24) as potential locations for Park and Ride facilities.

Shannon Municipal District Office continued '[we] would like to see the provision of localised or 'sub' Park and Ride facilities across the MD which are then serviced by a high-quality bus service into the urban areas. This will further improve the prospect of the commuter populations of Sixmilebridge, Newmarket-on-Fergus, Cratloe, and Shannon switching to new modes and away from the car.'

Many respondents mentioned Park and Ride stations concerning traffic reduction. Fine Gael Councillors of Limerick City commented, 'the park and ride suggestions have merit as we build towards 2040 but no realistic locations are being identified. The facilities have a huge potential to be used to reduce traffic coming into our city freeing up space for other modes of transport and making commutes more pleasant for the many people who come to work, shop and socialise in our city centre.' Tipperary County Council added, there is 'no mention of the potential for a park and ride outside of the LSMA. Providing additional capacity at existing train stations would reduce car traffic coming into LSMA, would maximise the capital expenditure which has already taken place at these locations and it would encourage more people to use public transport.'

Many respondents suggested alternative Park and Ride solutions. One respondent commented that there should be 'four Park & Ride locations named Limerick North, South, East, West – easy to understand and remember. All four potential Park & Ride locations should utilise both bus and rail.' The same stakeholder continued and commented on the Park and Ride signage and asked for, 'standard advance direction signs on approach roads…Green colour – associated with Limerick / associated with the environment.' Castleconnell Community Trust commented on the Park and Ride locations 'Park & Ride facilities at rail stations or bus links further out from the city may serve to redirect car traffic onto existing public transport infrastructure.'

A submission noted, 'in the Planning, Land Use and Transportation Study of 2001, it was proposed to introduce six Park and Ride facilities. The draft strategy proposes four such facilities which are located further out from the city centre. It is suggested that a re-introduction of the P&R 6 facility that was proposed in the 2001 strategy should be considered. This facility was proposed to be located at the N69 interchange with Dock Road. If introduced, it could provide significant potential for modal interchange between car and cycling and public transport (bus).' The option to construct a Park and Ride facility in the Colbert Quarter area was also noted. Another respondent commented, 'the LSMATS transport options fails to pick up the potential for other park and ride stations on the rail network radiating from Limerick in addition to Ballysimon. At Annacotty, the Limerick-Ballybrophy line passes close to the proposed Park and Ride at the M7 Newport roundabout. A station in this area, integrated with the Park and Ride needs to be investigated and delivered.'

The Southern Regional Assembly commented on the modal shift that Park and Ride facilities provide. They noted, 'there will be opportunities for Park and Ride sites to facilitate different types of modal change and the opportunities to integrate cycle parking, bicycle share schemes, car share schemes, EV charging stations, etc. should be maximised.'

One respondent stated that LSMATS did not address problem parking areas such as, 'serious parking issues around University Hospital Limerick. All Park & Ride projects must include shuttle options to the larger institutions in their immediate vicinity.'

Another individual commented that there should be a Park and Ride as well as a dedicated expressway next to the Limerick bus station. They stated that 'this will give all regional & intercity bus services very fast & comfortable access to Limerick Bus Station from the Motorway network.'

North Tipperary Community Rail Partnership mentioned that increasing Park and Ride locations could improve quality of life. They requested that LSMATS 'also consider cost-effective ways of using rail to improve the quality of life of commuters, students, and other public transport users by increasing the availability of "Park and Ride" locations, opening disused stations like Annacotty as outlined above, and by connecting in with Local Link and other bus routes.'

16.2   On-Street Parking

Topics included in this section are illegal parking, disability parking and allowances, reduction in car parking facilities, and requests for further parking availability.

Some respondents requested LSMATS implement a strategy to reduce illegal parking. Better Ennis noted, 'we would like to see an increase in the number of traffic wardens employed, close cooperation with local Community Policing and an extensive awareness campaign of illegal parking which disproportionally affects people with children, disabled people, particularly people using mobility aids or people with visual impairments. A citizen-led reporting portal should be included in the strategy.'

The National Disability Authority suggested, 'the following is added as under Objective PK3 (page 75): Recognise the need to provide accessible designated parking spaces for persons with disabilities and integrate this provision into overall parking management plans.' The Irish Wheelchair Association (IWA) also commented that there was 'not enough disabled parking spaces in the city centre and non-disabled drivers parking in disabled parking spaces.' IWA also suggested that 'disabled parking spaces could be indented into the footpath to lessen the area that their vehicle is protruding into the road and oncoming traffic.' IWA also asked that provision be made for disabled spaces to allow access to equipment that may need to be removed from a car.

Some respondents commented on the reduction of car parking facilities in cities. One suggested that 'each of the peripheral termini to have car parking facilities alongside to obviate the need to drive into the city centre. Those cars that need to go into the city centre to be accommodated in existing car parks at Howley's Quay, Arthurs Quay, City Centre, Cornmarket and Potato Market. On-street parking to be abolished (except for necessary deliveries) and the city centre to be pedestrianised.' Better Ennis also asked for the 'removal of on-street parking within city and town centres to improve the visual access and attractiveness of our streets and remove the unhealthy impacts of engine idling.' Better Ennis requested that secure and well-lit bike shelters should be provided as well as private car spaces for those with disabilities.

The Irish Georgian Society noted that Limerick is 'well served by multi-storey car parks' and off-street parking. They continued 'the extent of on-streetcar parking must be reviewed. Except for the provision of disabled parking spaces and 'click and collect" short term spaces, on-street parking space would be better used as outdoor space for both the hospitality sector and to facilitate safe queuing at a social distance for retailers.'

Some respondents were concerned there were not enough parking options. One commented, 'where do workers park if they come in from out of town?' Limerick Greens commented on 'the overprovision of multi-storey car parks in Limerick City we consider the provision of most on-street parking to be unnecessary in the city centre given competing demands for that road space by more sustainable modes.' Limerick Greens noted that LSMATS identified a problem with cars parking on footpaths however gave no solution. Additionally, Limerick Greens determined that LSMATS did not give sufficient attention to the reallocation of road space. They suggested that many of the cycling projects included in LSMATS will result in the removal of on-street parking and stated that discussion around this approach would have helped public acceptance. Limerick Greens continued, 'we also believe not enough analysis has been done in the strategy on the provision of on-street parking, and its effects on the city. While there is mention of repurposing of car parking areas, there is no detail

indicating the extent that this will be necessary.' The Shannon Group noted that additional parking bays should be considered 'to facilitate coach operators at King John's.'

Liveable Limerick mentioned flexible parking and offered an alternative solution, that Councils should allow 'planning permissions for parking spaces to mandate operating systems that allow urban/residential dwellers to allow workers to rent spaces when not in use by urban/residential dwellers. (Air BNB for Cars).'

Some respondents asked for the Parking Management Strategy to include more areas. Shannon Chamber welcomed 'reference to a review of parking in Shannon Town being undertaken and the development of a Parking Management Strategy but suggests that this should include a review of the Shannon Town Centre car parking. For example, the blocking of a previous access point at the Lidl roundabout had a big impact on traffic behaviour.'

16.3   Response

In relation to Park and Ride, the overriding principle for delivering such facilities is to maximise the number of cars that can be intercepted and transferred onto public transport in advance of reaching the congested road network in the suburbs and city centre. As such, the optimal locations are those where the strategic or national road network meets the high capacity public transport system. The four locations chosen in the draft LSMATS fulfil those criteria and the NTA is satisfied this represents an efficient and effective approach to this matter. This does not preclude other facilities being brought forward as options.

With regard to on-street parking, the draft LSMATS clearly sets out a comprehensive network of bus priority on approach to, and within, Limerick City Centre. It also states that in order to provide this priority, road space will be reallocated from the private car to the bus. This includes on-street parking. An approach to management of on-street parking is also set out in the draft LSMATS. This will also apply in Shannon and other Metropolitan Towns.

17. Roads and Streets

The Mid West National Road Design Office made several comments about roads in general. They stated that the N/M20 Cork to Limerick Road Improvement Scheme is an important complementary project to LSMATS. They stated that regional policy provides for projected population growth of 50% to 2040 in the cities of both Limerick and Cork which 'brings into sharp focus the need for greater synergies between the largest urban areas in the region, including the efficient and effective movement of people, goods and services across and between such areas.' They outlined that the draft strategy identifies a number of key challenges for the Limerick Shannon Metropolitan Area and they remarked that the N/M20 Cork to Limerick Road Improvement Scheme has an important part to play in addressing a number of these. In addition to this, it was stated that alongside the maintenance and enhancement of the strategic function of national road infrastructure, it will have a critical role in the planned development of the inter-urban transport network in the south and southwest of the strategy study area.

One submission stated that in order to make the strategy effective, the Project Team would need to dramatically improve the connectivity of Cork and Limerick. It was said that this could be achieved relatively rapidly by progressing the M20 road network linking Cork and Limerick as Galway and Tuam are already connected.

A respondent expressed concerns with the strategy due to a discrepancy between 'the goals and environmental background research and the actual plans for roadbuilding.'

Another submission stated that certain pages of the Background Paper included 'only enlarging intercity roads and interchanges, constructing bypasses of two towns and one city (Limerick).' They expressed concern over the time put into feasibility studies and the reasoning behind certain requirements being identified. They queried about the multi-modal functionality of roads and if European, national and regional environmental requirements would be met.

IBEC stated that the proposed upgrades in the LSMATS road network 'are welcome and are all essential to deal with current and future demand. Intra-urban and regional connectivity need to be prioritised. Accelerated delivery of infrastructure projects is crucial.'

One submission welcomed the prioritisation of pedestrians in the City but stated that private car access is important for people with disabilities. This submission highlighted the importance of accessible taxis. It was requested that the strategy include plans for disabled parking in pedestrianised zones with safety measures for disabled individuals.

The Limerick Green Party remarked that although LSMATS was focused on sustainable transport, that there was a lot of emphasis put on roads projects. 'LSMATS asserts the need for around €3bn worth of roads projects, which is incredibly underestimated by a factor of 10 as €290m in the graphics.

17.1 Motorways

Tipperary County Council cited some of the intentions of the NTA, TII and the local authorities regarding motorways. They discussed projects such as, the N/M20 Cork to Limerick Road Improvement Scheme; the N/M24 Improvement Scheme; the N69/M21 Foynes to Limerick Road (including Adare Bypass).They expressed that the provision of a dedicated National Road or Motorway to improve connectivity between the three cities in Ireland's southern region, is consistent with the NPF's National Strategic Outcome 2, to provide Enhanced Regional Accessibility. In addition to this, they noted that the NDP identifies the M24 as part of the national road network which will be progressed in order to prioritise projects which will proceed to construction.

TII stated that the Draft LSMATS includes indicative locations for junction improvements on the national road network on the 'Proposed Road Network 2040' Map.

The Housing Development Directorate of Limerick City and County Council requested that the strategy would provide more direct access from the M7 and N20 into Southill.

IBEC stated that completion of the M20 and connecting second and third cities will be a key enabler to the overall growth of the entire region.

17.2   Other National Roads

Tipperary County Council expressed that the upgrade of the N24 will assist in addressing the congestion which exists for traffic entering the LSMA along this road corridor which serves Counties Limerick, Cork and Tipperary.

The Shannon Group had comments on the M21 and the N69 and N21. They stated that the proposed upgrade of the road is a key piece of transport infrastructure that will support the expansion of the Port of Foynes as set out in the Government's National Ports Policy and the NPF. They explained that Foynes is designated as a Core Port under EU regulations (Trans European Network TEN-T).

Ennis Municipal District stated that they wanted to see a complete inner relief road to Quin Road from Dunnes; to link roads from Lahinch Road to Gord Road to Tulla Road to Quin Road; and an M18 link to Quin Road.

One respondent commented that the N19 Shannon Airport Access Road Improvement Scheme would be 'a key enabler for the development of enhanced connectivity to Shannon International Airport and Shannon Free Zone which are major employment centres. The Project Steering Group gives broad support to the LSMATS as it relates to the N19 Shannon Airport Access Road Improvement Scheme and its delivery as part of the short-term goals in the LSMATS implementation plan 2026.' IBEC explained that Shannon Airport is a key driver of business in Ireland's Mid-West, connecting the region with European and Transatlantic destinations. They stated that any transport strategy for the region should focus on improving airport access. They also mentioned the N19 approach to Shannon Airport, noting that this is now a single carriageway, stating that it is a key focus area as it often causes extensive congestion in peak times. 'The N19 capacity constraints at the junctions connecting to the Shannon Business Park and Shannon town also need considerable improvement.'

Shannon Chamber welcomed reference to the upgrade of the N19 and recommended that this be upgraded from the single carriageway road layout and that the current capacity constraints on the N19 junctions connecting Shannon Free Zone and the town be addressed. They requested an upgrade to the N19 approach road to Shannon Airport from the current single carriageway road layout; to address capacity constraints on the N19 at junctions connecting to the Business Park and Town; and consideration to be given to a future upgrade of the Limerick to Kerry route to facilitate easier access to Limerick, Shannon Airport, Galway, and the West of Ireland.

Mid-West National Roads Design Office noted that the draft Strategy 'acknowledges the key role played by national roads in the overall transport system for Ireland. It further identifies and includes as part of RS4, the delivery of the N/M20 Cork to Limerick and the Foynes to Limerick (Including Adare Bypass) projects, which is welcomed.' They stated that the N24 played a significant role and was of strategic importance.

The Southern Regional Assembly stated that the RSES sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors. They noted that the steady-state maintenance and safety of the National Roads network is critical to ensure that the existing extensive transport networks are maintained to a high level and to ensure high-quality levels of service, accessibility and connectivity for transport users. They also noted that investment in maintaining regional and local roads and strategic road improvement projects to unlock development opportunities and to support road based public transport is a key RSES priority.

Shannon Chamber suggested that the multiple access points to Shannon from the N18 serve to balance out the current traffic flow. The differing peak travel patterns translates into people accessing their workplaces using different routes in and out of Shannon depending on the time of day. Shannon Chamber welcomed more discussion on proposals in this regard and how they would best serve over 10,000 people that travel to Shannon daily for work.

17.3   Regional Roads

The Shannon Group stated that the R471 regional road is the main access road for the SFZ East and Shannon Town. In order to support the growth projected by Shannon envisaged by the NPF and the RSES, the Shannon Group noted it is integral that investment in the regional road infrastructure is earmarked and prioritised.

The Housing Development Directorate of Limerick City and County Council expressed that the Framework Plan for Moyross had an objective to support the construction of the Coonagh-Knockalisheen bypass and to extend the existing Moyross Avenue to link with the new western entrance of the Coonagh-Knockalisheen bypass.

17.4   Local Roads and Streets

One submission stated that any additional crossings of the River Shannon should evaluate the consequences of the special requirements of the tolling scheme and the financial implications of same for the Exchequer.

The Housing Development Directorate of Limerick City and County Council asked the Project Team to create a direct connection from Roxboro roundabout (through the 'Galvone Arms' site) to the heart of Southill. They noted that it is the objective of the Framework Plan to improve local connections within Southill. They also remarked that it is the objective of the Framework Plan to explore the potential to re-establish and environmentally improve the west-east link through the Galvone Industrial Estate from the Roxborough Road to the Kilmallock Road subject to securing an alternative location for the Traveller halting site currently located at Clonlong. They further noted that permeability and connections from Ballinacurra Weston to its wider context needed to be improved. They stated that the Framework Plan aimed to examine options to improve permeability and connections from St. Mary's Park to its wider context at the following locations, whilst ensuring protection of the integrity of the environmentally designated sites. It was also mentioned that an improvement in connectivity from St. Mary's Park to the Medieval Quarter was needed by transforming it from a route that is predominantly designed for the movement of vehicles to a traffic calmed street where the needs of pedestrians, cyclists and public transport users are prioritised. Finally, they noted that the route of the new connection from St. Mary's Park over the River Shannon should be selected to ensure no significant impacts on the integrity of the site and restricted working areas will be imposed to ensure minimal disturbance to sensitive habitats.

Shannon Chamber requested the development of a signalised junction at R481 at Smithstown and a link road to connect with the existing road. They also asked for an upgrade of the junction L3126 and Low Road as it approaches Bunratty.

The Shannon Foynes Port Company explained that the primary road access to and from the Port of Foynes is via the N69. There is also some regional road connectivity serving the port, in particular the R521 regional road, which connects to the N69 just east of Foynes.

Cllr Elena Secas remarked that any new development of the local road network, including the proposed road linking Old School House Road, Golf Links Road junction and Groody Link Road, Bloodmill Road, local road linking Old Ballysimon Road and Old Cork Road, must accommodate public transport, cycling and walk lanes.

The Shannon Group made a number of observations. They stated that appropriate road infrastructure is integral in catering for additional growth in the tourism sector over the next number of years within the Limerick Shannon Metropolitan Area. They expressed that works to upgrade and improve the road alignment of the L3126 are identified as being a key strategic road infrastructure project in the Limerick Shannon MASP prepared as part of the RSES for the Southern Region. They stated that 'works to the R471 regional road and L3216 local road are of such critical importance in the context of employment creation and tourism product development and generation, that they should be specifically earmarked within the final Strategy as key infrastructural improvements.'

Ennis Municipal District Cllr Jonny Flynn cited a need to complete the inner relief road to Quin Road from Dunnes and to link roads from Lahinch Road to Gort Road to Tulla Road to Quin Road.

Limerick Green Party stated that LSMATS should be stronger on the value of roads and streets as places in their own right, over and above their function as transport corridors, to the economic and social well-being of the city. 'As such it should set a clear standard for how treatments and interventions are carried out. All such treatments and interventions, whether routine maintenance or capital projects, should have multi-disciplinary input. This is to ensure place-making is enshrined in the local authority's approach to street management.'

A respondent from UL questioned the requirement for the enhancement of regional and local roads. They expressed that 'it is our contention that there is no such requirement, and now less than ever before.'

One submission stated that the connection between Plassey Park Road and the North Distributor Road went through their premises. They asked that this be double checked and a suitable alternative proposed. They stated that the option at present would lead people to cut through UL which would lead to strain on road infrastructure.

A respondent stated that taxis did not feature in the Strategy and requested that it 'include the Taxi services and other transport services such as car rental, private buses & potentially Uber type services.' The respondent stated that the Strategy should support a road network with minimal congestion as with the advent of electric and intelligent cars it will be a part of Limerick into the future.

17.5　Limerick Northern Distributor Road (LNDR)

Cllr Frankie Daly noted that the LNDR brings huge benefits of an education work and knowledge connector across the north of the city with the benefit of reducing unnecessary journeys through the centre of the city enabling a pedestrian friendly city.

UL noted, Shannon relies on the timely development of the LNDR. They expressed that 'its timely delivery is not adequately supported or allowed for in the Transport Strategy.'

TII expressed that the LNDR is not a national road scheme and 'any additional crossings of the River Shannon should evaluate the consequences of the special requirements of the tolling scheme (N18 Limerick Tunnel PPP Scheme) and the financial implications of same for the Exchequer.'

The Shannon Municipal District considered the LNDR critical to the performance of south east Clare and Limerick City north. 'It is imperative that the LNDR remains central in the delivery of LSMATS and is not presented as a "rat-run" or alternative to the southern relief road.'

Deputy Maurice Quinlivan stated that the creation of this road network [LNDR] would open the northside of Limerick City up and allow ease of access to all major routes around the city. He said that the utilisation of the Limerick tunnel and linking it with the prompt delivery of the Northern Distributor Road would create a road that would connect Annacotty (Mackey Roundabout) to the opposite side of the city and that this would allow ease and speed of access to both sides of the city and further afield. He also expressed that the urgent completion of the Northern Distributor Road would alleviate employment concerns in Moyross and allow quick and direct access to and from the Industrial Park. In addition, he remarked that 'the urgent commencement of the works on the Northern Distributor Road would alleviate some of the transportation exclusion and social deprivation that this area of the city is currently facing.'

One submission remarked that the LNDR is 'at odds' with the RSES key principles 'by opening up urban sprawl and perpetuating private car dependency' and expressed that they would like it removed from the strategy. They expressed that the need to focus on smaller towns and villages negated the need for the LNDR.

Ennis Municipal District stated that the delivery of the Limerick Northern Distributor Road is 'critical for wider regional development.' One submission noted that the LNDR would bring huge benefits and reduce unnecessary journeys through the city centre.

A member of a residents group raised several concerns about the LNDR. They raised concern that the community would be destroyed and wanted the strategy to support their community. They cited that the parish would be split, and areas would be cut off from one another. They further stated that the demolition of homes would lead to social isolation. It was noted that the residents' group are in favour of reducing the number of cars on the roads and the community would like to see a cycling path developed in the area. They noted that the proposed LNDR route is adjacent to the hydro-electric power station at Ardnacrusha and there were concerns from some residents that this will impact the structure and the green forest railway path which they noted needs to be conserved both as a site for tourism and its contribution to National Heritage. Period residences were noted as being situated in the area. The submission expressed that Limerick City Centre is in decline and there is concern that safety, pollution and health implications from increased traffic from the LNDR would occur.

Limerick Chamber welcomed the recognition of the importance of the LNDR in the draft strategy and cited its functions. The submission expressed that the LNDR will play an important role in Limerick's development. 'It will represent the first 'knowledge corridor' in the country connecting two major third level institutes with key employment zones. Furthermore, we believe that the LNDR (as an orbital route) has a critical role to play in the successful operation of the bus corridor from the National Technology Park/UL to the city centre.' They stated that the LNDR should therefore progress in tandem with other public transport and active mode developments.

One submission noted that the LNDR would reduce the need for frequent trips through the city, particular for Corbally and Parteen residents.

One submission stated that a potential consequence of the LNDR was the potential for the creation of a Strategic Development Zone adjacent to this new road with proposals for a masterplan in this area.

One respondent questioned the rationale for the LNDR in reducing traffic through UL. They expressed that any roadbuilding that counts on last year's traffic patterns regarding UL relies on data that is out of date and unreliable.

A submission cited the LNDR as a key piece of infrastructure required to cater for traffic capacity and sustainable public transport. Several submissions urged the LNDR to proceed in order to support access. It was expressed that the LNDR and LSMATS should be developed 'in synergy.'

Clare PPN stated that the LNDR would result in further urban sprawl and a car dependent lifestyle. They expressed that 'we need to enable, entice and incentivise people back to living in healthy, accessible, urban centres, not invest in unsustainable developments.'

Limerick Green Party objected to the LNDR. They stated that 'we object to the inclusion of the LNDR in the bus network and we suggest that this represents a greenwashing of this inappropriate road project.' They stated that it is a project to encourage dispersed development and private car use.

One submission expressed that there was neither need nor demand for the LNDR. They noted that the road would damage wetlands and areas of natural and historical importance. They also stated that the LNDR was not in line with the strategy's goals, nor did the strategy itself take Covid-19 into account. Concerns were raised that 'the LNDR will act as a by-pass to the North of Limerick city for motorists, who want to avoid the tunnel to the south which is tolled at present. At the first presentation of the LNDR there even was a map that did not show the costly Limerick tunnel, and our concern is that, once again, vital recent developments do not seem to be being taken into account in any way.' This submission also cited environmental arguments against the LNDR.

It was noted in one submission that the road would be built on a flood plain, risking houses and damage ecological marshland and lead to noise pollution. Local geese and birds were cited to frequent the area. The Shannon bedrock was noted as being affected also.

One respondent stated, 'our family is totally opposed to this Transport Strategy because of the damage the proposed Limerick Northern Distributor Road will inevitably cause to the local landscape. This proposal is in total contradiction to the environmental policy of the Green Party.'

17.6   Traffic Management

Several submissions highlighted areas in which they believe traffic could be reduced, some added maps to their submissions.

Local residents in one area highlighted that the community already has Limerick Institute of Technology, Thomond Park, LIT Gaelic Grounds and UHL Maternity Hospital close to it which already experiences heavy traffic when events are taking place. One submission asked that the Project Team be cognisant of Corbally, a commuter suburb that experiences major traffic congestion. The width of the road is not suited to the large volumes of traffic passing through it, it causes noise and air pollution, and is unsafe for children and the elderly in particular. It was suggested to either make it a one-way street, use bollards or prevent summer access. One submission suggested that heavy traffic be re-routed to the routes circulating the city and this would be of benefit to city residents.

One submission suggested that all impact analysis documentation be made available to highlight any bottlenecks that would occur in the transport system.

It was highlighted that the redevelopment of Arthurs Quay as outlined in Limerick 2030 is a priority project within the plan and from our initial review of the implications for traffic management within the city centre a two way traffic system in the core of the city centre would be more appropriate which was advocated in the 'Limerick Metropolitan District - Movement Framework Study.'

A respondent stated that two-way systems lead to less traffic congestion during peak periods, that the current dependence on the private car needs to be addressed and in particular in relation to a new planning application and encouraged car sharing, park and ride, public transport and assisted mobility systems.

Shannon Chamber remarked that a review of Shannon Town Centre parking including rationale for blocking a previous access point at the Lidl roundabout and its negative impact on traffic behaviour was needed. They also suggested the development of an integrated coach management scheme to support traffic management measures at key locations.

An Taisce expressed that an increase in the quantum of motorway and lesser routes will lead to an increase in the amount of vehicular traffic using those routes, bringing with it predictable negative consequences.

Clare PPN expressed that Shannon Town Roundabout is in urgent need of measures such as traffic calming, traffic lights or pedestrian crossings as it is currently extremely difficult for car drivers, pedestrians, wheelchair users and cyclists to get across the junction. They asked to see a 30km/hr speed limit implemented.

Limerick Green Party remarked that primary and secondary designated cycle routes should be fully segregated from private car traffic and that tertiary routes may involve traffic calming and modal filters to restrict traffic. They expressed that in accordance with DMURS, road space will be allocated to pedestrians, cyclists, public transport users and car drivers in that order of priority. The party shared that congestion charging should be applied with differentiated pricing based on routes and times of high demand on the road network. In terms of traffic management, 'the strategy should be very clear that the local authority must prioritise sustainable and active modes over the movement of unsustainable modes in its day to day operations as well as its infrastructure planning.' They noted that waiting times and crossing times for traffic lights were not mandated in LSMATS. They asked the Project Team to 'reallocate road space away from private car transport towards more sustainable travel modes.'

The Shannon Group remarked on Limerick City's tourism. To accommodate tourism numbers into the future, 'an integrated coach management scheme must be implemented to support traffic management measures at key locations.' In progressing this strategy, they said it is considered that the provision of additional parking bays to facilitate coach operators at King John's is required and should be carefully considered in preparing the Coach Management Strategy and that specific reference should be made to King John's Castle, alongside Shannon, Bunratty and the Wild Atlantic Way.

One submission suggested the implementation of a "Super-Block" concept to Limerick city centre, removing through traffic from the city's core except for disabled, residential and time limited commercial access. They stated that all public transport stations should be located on the perimeter of the Super-Block. In addition to this, it was requested that urban roofing be installed to provide shelter to users of the spaces within the super block.

The Irish Georgian Society suggested that a vision for Limerick City centre and a public realm strategy should underpin any decisions around traffic management within the city. 'A focus on walkability, active travel and high quality-public spaces will protect and enhance the historic centre.' LSMATS was noted as having 'ignored' the city's historic context. The Irish Georgian Society noted that Ireland had signed up to the Charter for The Conservation of Historic Towns and Urban Areas. They expressed that the car centric focus in the Georgian city centre has created a hostile and hazardous environment for pedestrians. Reference was also made to pedestrianised streets in historical European cities.

Shannon Municipal district highlighted that it is important that consideration be given to the opportunity of streamlining the costs associated with using the Limerick Tunnel (toll). Current toll charges. It was recommended that charging structures be reviewed to streamline the service which will incentivise the use of the tunnel, which in turn would take pressure off locals.

17.7   Response

In preparing this strategy the NTA took into account the policies and objectives of Transport Infrastructure Ireland, the Southern Regional Assembly, and the two local authorities, as they relate to roads. The provisions of the National Development Plan and the views of the Minister for Transport have also been taken into account, as well as the feedback received in consultation. As such, the revised draft LSMATS does not provide for the completion of the LNDR beyond the Coonagh-Knockalisheen section.

In relation to specific local roads, the NTA has re-examined the LSMATS to ascertain the level of detail which should be included in this high-level strategic plan and included more where deemed appropriate.

It should be noted that all road schemes in the LSMATS are subject to project-level cost-benefit analyses and full environmental assessment, including an assessment of their impact on mode share, emissions, biodiversity, protected sites, human health, etc. In relation to costs, no evidence has been provided to support the statement that the costs of the road network in the draft LSMATS have been underestimated.

With regard to traffic management and the function, shape and use of urban streets, the draft LSMATS sets out a framework at the appropriate strategic level for application at the local level. As stated in the draft, more detailed Traffic Management Plans are to be prepared for Limerick City Centre and the other Metropolitan Towns. Assertions that the LSMATS ignores the historic context of Limerick are not accepted. On the contrary, the draft LSMATS provides the framework for the significant mitigation and reduction of adverse impacts of traffic on the urban environment.

18. Freight, Delivery and Servicing

The following section discussed submissions received in relation to HGV's delivery and servicing.

18.1 HGV's

A residents' association stated that HGVs would back up local roads, particularly the Ennis Road which is busy, creating a bottleneck. Another submission expressed they would like to see a ban on HGVs from the core of Limerick City and Shannon Town and a strategic plan for last-mile delivery services throughout the area. One submission said that the toll should be removed from the Limerick tunnel and there should be a ban on HGVs from the city centre.

Gas Networks Ireland stated that compressed natural gas (CNG) should be included as a solution to decarbonising the freight sector. They explained CNG provides a lower carbon alternative to diesel for heavy goods vehicles and buses. The Sustainable Energy Authority of Ireland (SEAI) estimates indicated that HGVs produced 14% of total transport emissions. 'Decarbonisation of HGVs and buses is particularly challenging as electricity is currently not a viable alternative to diesel. CNG has the potential to address these transport emissions with reduced carbon emissions relative to diesel. 'There should be an objective included in this section of the LSMATS to support the development of CNG refuelling infrastructure.'

Rather than limiting the size of HGVs accessing Limerick city centre, it was suggested they be replaced by smaller vans with a higher environmental impact. Shannon Chamber suggested assessing the feasibility of developing a consolidation centre outside the city as a means of reducing the number of HGVs entering the city.

The Southern Regional Assembly noted that the recognition that our export orientated economy and servicing growth will continue to generate growing HGV movement is important. 'The importance of freight management through the Southern Region, especially between our metropolitan areas, Tier 1 and Tier 2 Ports and Airports is a strong priority of the RSES and within the Limerick Shannon MASP.'

Shannon Foynes Port Company noted that traffic to and from the Limerick Docks was of strategic importance and necessary for successful operation of business. They requested that LSMATS be cognisant of the importance of HGV movements to the docks and that restrictions would not impact them. 'An understanding of the unique operational requirements and HGV movements associated with Limerick Docks, as outlined above and detailed in the Limerick Docklands Framework Strategy, should be included in the LSMATS.'

It was remarked that Limerick has to-date received one cycle lane on Shannon Bridge that had been modified for 'abnormal load bearing HGVs' and in doing so making this one piece of infrastructure unsafe once more. The respondent stated that 'this strategy needs ambition that is set down in targets that cannot be fudged or side-lined at a later date for priorities such as 'abnormal load bearing HGVs.'

18.2 Delivery

The EPA stated in relation to the support for a regional freight strategy, that this should also consider the requirements of the SEA and Habitats Directives.

Shannon Chamber asked the Project Team to consider the impacts of online shopping and the associated doubling of van deliveries during Covid-19. They expressed that this is increasing carbon footprint, 'particularly in rural areas where distances required for each delivery are higher than in urban locations.'

It was noted that delivery drivers are increasingly blocking ramps and footpaths for pedestrians.

18.3 Freight

One submission cited that it is the intention of the NTA and the local authorities, in conjunction with Irish Rail and Shannon Foynes Port Company, to investigate the feasibility of rail freight from the Port of Foynes to Limerick and further afield over the lifetime of the Strategy. They noted that Objective FDS3 needs to be updated to reflect the Minister for Transport's announcement in Dáil Eireann on September 24th, 2020 and reaffirmed in the Seanad on October 23rd, 2020 that he supports and will seek funds to reopen Limerick to Foynes as part of a strategic Atlantic rail freight spine linking Mayo to the ports of Foynes and Waterford. 'It also needs to align both OBJECTIVE RL6 and FDS3 to the AECOM 2040 Freight Strategy commissioned by Iarnród Éireann and due to be published in November 2020.' It was remarked that LSMATS needs to ensure that the infrastructure in place will allow the development and delivery of rail freight. 'This includes sufficient freight paths

on all existing lines, appropriate infrastructure such as sufficiently long passing loops and freight sidings to allow for the loading and unloading of rail freight.' They also noted that LSMATS should highlight that in order to grow rail freight in the Limerick Shannon Metropolitan Area there needs to be reform of track access charges and grants for rail freight. It was highlighted that Ireland is the only EU country which doesn't support rail freight through grants.

It was noted by one respondent that the LSMATS references reducing the environmental impact of freight while at the same time improving efficiency in the movement of goods and promoting economic competitiveness.

Shannon Chamber suggested that any review of rail freight should take into account work on the Western Railway rather than seeing Limerick to Foynes as a self-contained piece. The development of renewable energy along the Atlantic Economic Corridor would require interlinked and sustainable port and transport facilities; the Port of Foynes is a strategic part of this network, they outlined. Another submission expressed that LSMATS review rail freight taking into account work on the Western Railway, citing renewable energy.

Shannon Foynes Port Company (SFPC) outlined their terminals in their submission. They outlined a number of considerations for consideration into a potential HGV or Freight Strategy for the city. They noted that delivery of rail freight capability from Foynes 'is a real possibility and the potential needs to be protected.' SFPC expressed their support for the development of a regional multi-modal approach to address the region's growing freight challenges and support long term international competitiveness. However, 'there is a concern that transport policies will be planned mainly from the passenger transport perspective, without adequate consideration of the needs of freight transport. Any Strategy being advanced must integrate all freight modes – road, rail, air and maritime, encompassing all tiers of government and jurisdictions.' It was noted that one of the guiding principles upon which LSMATS is based is to identify and protect key strategic routes for the movement of freight traffic. The submission recommended 'that an objective in the Draft LSMATS seeks to protect current and future strategic freight corridors to ensure that there is sufficient network capacity on both road and rail going forward to meet the LSMA's growing freight task, including routes to and from the Port of Foynes and Limerick Docks. Land use development should be carefully monitored and managed in and around these corridors to ensure the viability of these corridors over the longer term, including the potential identification of locations for freight distribution hubs.'

One submission suggested that Colbert Station be used as a freight depot.

Iarnród Éireann remarked that there is a necessity and demand for sustainable freight transportation across Ireland. Iarnród Éireann is currently developing a revised rail freight strategic plan in the context of; The Governments Project Ireland 2040, National Development Plan, National Mitigation Plan & Climate Change Action Plan; The Strategic Masterplans of Ireland's Port Authorities; road congestion; pressure on road freight markets e.g. driver shortages; policy, demand and sectoral analysis being undertaken to establish demand and opportunities for rail freight. They noted is could be implemented in the short-medium term potentially, depending on the demand for the bulk movement of goods to and from the Shannon-Foynes Port Company.

18.4   Response

The draft LSMATS supports the re-use of the Foynes line for use as a freight facility.

In relation to HGV movement in the city centre, the LSMATS provides for a full assessment of the traffic management system, including restrictions on HGV movements. Reducing the toll on the Shannon Tunnel is not a matter for the LSMATS or the NTA.

After the LSMATS is finalised, the NTA in collaboration with the Southern Regional Assembly and local authorities will prepare a regional freight strategy encompassing all matters related to goods movement, deliveries and servicing.

19.   Supporting Measures

This chapter outlines submissions regarding supporting measures, which was mentioned 23 times in submissions.

19.1   Bike Share Scheme

One stakeholder asked for an extension of the bike scheme and requested 'a bike station in Corbally, as this would be of use to those commuting both into the city centre and along the riverbank to UL.'

The Shannon Group requested more information on 'the requirement for a feasibility of dock less Bike Sharing Schemes in Shannon (Airport, Free Zone and Town).'

19.2   Behavioural Change Initiatives

Topics covered include the need for behaviour change initiatives, ambitious targets, collection of data, and how to initiate change.

Some respondents commented on the need for behavioural change initiatives. The Shannon Chamber commented, 'unless there is a change in policy and practice, people will not transfer to public transport; interventions to change habits will take time but will be considered if the benefits are obvious and widely promoted. Could lessons be learned from countries such as the Netherlands, where public transport is expensive, yet a high percentage of the population already use it?'

The EPA welcomed the commitment 'from the NTA and Local Authorities to appoint dedicated walking and cycling officers within each local authority.' They acknowledged the intention to develop local transport into city and town centres. Edwards Lifesciences/National Technology Park traffic group requested information and training on successful mobility management plans to ensure best practice, including 'how best to promote cycle/ walking for workers living near the NTP.'

One respondent mentioned the need for digital muster points to capture the 'volume of data available in the city that can influence the future of our environments and influence a change in behaviour that will enhance citizen engagement with the city and how transport influences their choices. This would appear to be completely missing.'

One respondent commented on the cycle-bus which they consider has been adopted by the LSMATS as a vehicle to change behaviour. However, this respondent stated that a behaviour change initiative 'must start within the local authority, where efforts should be made to introduce initiatives that may lead to behaviour change. The council's focus should be behaviour change, not relying on volunteer initiatives such as the cycle bus to do it for them. Another individual added, 'this approach must have at its heart an emphasis on sustainability – achieving behavioural change with a focus on walking, cycling, and public transport as real alternatives for travelling within larger urban centres.'

Shannon Municipal District stated, 'it is considered vital that public awareness is heightened and behavioural change towards public transport is promoted through the development of a new programme like the 'Limerick Smarter Travel' initiative for the LSMATS areas. Smarter Travel saw a partnership approach guiding investment in infrastructure and behavioural change measures.'

One stakeholder referenced gender and its role in changing behaviour. Clare PPN noted there are issues and factors regarding behaviour change and single car journeys. The issues identified were 'safety and perception of safety the prevalence of "multi-purpose trips" when car usage is examined by gender. (For example, multi-purpose trips include when a person uses their cars on short trips to bring children to school – possibly different schools, continues to get groceries elsewhere, and then travel to work).'

19.3   Technology for Sustainable Transport

Some respondents requested further information and initiatives. Limerick Chamber requested that NTA/LCCC formally commit to an 'Innovation and Technology Plan that considers the opportunities for the implementation of a range of (disruptive) digital technologies (e.g. the internet of things (IoT), big data and AI) that will revolutionise the transport sector in the medium term.'

Gas Networks Ireland commented, 'a paragraph giving a high-level explanation of CNG technology should be included as well as support for the development of CNG refuelling stations. In addition, Objective SM6 should be reworded to include CNG.'

Some respondents mentioned the electric vehicle charging points. Tiernan Properties proposed 'that the strategy should include the advocacy of grants/inducements for the construction of Electric Vehicle Charging Points to assist in bringing Ireland in line with EU emissions standards.'

An Taisce also commented on the electric vehicle charging points and requested these 'be extended to providing specific charging points for electric bicycles.'

19.4 Response

In relation to behaviour change initiatives, the LSMATS provides the high-level policy framework for the continuation and expansion of the existing NTA programmes. Additionally, it provides the basis for both local authorities to complement these programmes with their own initiatives.

The NTA is now overseeing Safe Routes to School, a national school travel programmes which will target investment at the creation of school zones and school streets and other measures to deliver safer walking and cycling routes to school and school environments, with associated promotional programmes. This is being done in conjunction with An Taisce Green Schools and the local authorities.

With regard to technology, the NTA is prepared to adopt proven systems into our public transport and bicycle hire systems and to fund innovative approaches to traffic management in urban areas. In relation to fuels, the LSMATS facilitates the roll-out of supporting infrastructure in the LSMA, which will be undertaken by the local authorities and has begun the process of converting the national public transport fleet to low and zero emissions vehicles.

The NTA, however, is of the view that reducing the use of the private car (of all fuel-types) is the imperative of transport planning in the city-region as a means of meeting environmental, economic and social objectives related to emissions, congestion and car-dependency.

20.   Funding and Strategy Outcomes

20.1   Funding

Topics covered include cost and the funding of schemes, sources of funding, non-motorised transport funding.

Some respondents commented on the cost and the funding of the scheme. Better Ennis stated, 'we are calling for the redraft of LSMATS to prioritise active travel investment of public funds - given it is the most sustainable, most cost-effective, most resilient, most equitable mode of transport.' Another respondent added, 'this strategy needs to make a serious commitment to commence these improvements immediately and the government needs to underpin this commitment with a serious commitment to capital funding of these improvements.'

One individual commented, 'the development of Sustainable Urban Mobility Plans (SUMPs) is encouraged by the European Union through a range of various funding opportunities and other resources. Funding can be applied for through the European Structural & Investments funds.' They continued, 'an Urban Regeneration & Development Fund worth €2 billion will support the development of the National Planning Framework (NPF) in the five largest cities of Dublin, Cork, Galway, Limerick, and Waterford. Limerick Council could prioritise redevelopment of its Public Transport Infrastructures as an essential Capital Infrastructure Project that warrants major reallocation of National Govt. funding, that would have otherwise been spent on less pertinent projects in Limerick.'

Limerick Chamber commented, 'LSMATS commits 3.6% (€50mn). An increase in the funding allocated to walking should mitigate the anticipated loss of the transport plan as currently configured, increase the share of those choosing to walk while also contributing to the decarbonisation of transport in the metropolitan area.' Another respondent added, 'this strategy needs to make a serious commitment to commence these improvements immediately and the government needs to underpin this commitment with a serious commitment to capital funding of these improvements.'

Further comments were made regarding the source of funding. IBEC noted, 'significant work should be undertaken to identify appropriate funding sources for specific commitments identified in the strategy. Key projects must be supported in the revised National Development Plan.' IBEC continued, 'we must look to European sources for funding mechanisms. Limerick and Clare county councils should build on their track record of successfully utilising European Structural and Investment Funds to support economic development.' IBEC added 'the European Investment Bank (EIB) is a potential source of funding for long-term capital investment. It has funded key transport projects across the country. An €85 million Framework Loan Agreement has been put in place by Limerick City and County Council with the EIB, a record commitment for an urban Ireland investment programme for the city.' IBEC also commented, '2040 has introduced new competitive funding streams such as the Urban Regeneration and Development Fund, which could support improvements to the urban realm such as integrating cycling infrastructure into wider metropolitan development. Successful draw-down of some of these funding sources will require regional and local authorities to develop strong local partnerships, particularly with the private sector.'

Ennis Municipal District commented on Ennis's infrastructure and the funding required for growth. '[County Clare] should be fighting for a target of at least €2,500 Million of which around €650 Million is needed for Ennis MD by 2030.'

Many respondents mentioned non-motorised transport funding. Swift Taxis Limerick Ltd commented, 'partial fundraising by Cycling Groups, Local Enterprises or indeed Multinational Companies could be looked at.'

Some respondents commented on the reallocation of road space. One individual commented, 'in broad strokes, this plan must ensure that there's a 2:1 ratio of spending on public and private transport, which seems unlikely considering the large-scale road building planned in this document.'

20.2   Health

A number of respondents discussed the link between how improved transport infrastructure would lead to improved public health both mentally and physically.

Several respondents addressed the links between active travel, health issues and Covid-19. A respondent stated, 'it goes without saying that increased active travel will also improve the health of Limerick communities

particularly those living in the city centre and make it more resilient against Covid-19.' Another submission noted 'the current draft of LSMATS comes from a time before Covid-19 and is completely unequipped to address this and other public health issues. High levels of air pollution may be "one of the most important contributors" to deaths from Covid-19, according to research.'

Limerick Chamber noted 'without significant change there is a risk that this strategy will contradict efforts to promote Limerick as a healthy city.' They added, 'the increasing number of cars have also led to rapidly flowing traffic and/or congestion…it has been estimated that there are 1,700 new cases of childhood asthma as a result of traffic-pollution in Ireland every year.' With a further respondent noting, 'transport related air pollution is a huge issue in this country. Ireland has the fourth highest asthma rate in the world and Limerick has the highest rate in Ireland.'

The Limerick Pedestrian Network recommended the 'inclusion of positive health outcomes as a strategy outcome of LSMATS. Both physical and mental health measurements should be included within this.'

The Irish Georgian Society noted 'throughout the LSMATS draft, public health is frequently referenced without substantive discussion of the benefits of active travel and we argue that positive health outcomes must be a strategy outcome of LSMATS.'

One respondent questioned, 'how are we expected to see the public health benefits of active travel if we have such low projections? We should have ambitious targets and work towards them.'

In terms of cycling, a submission noted 'the section on cycling contains no reference to our ageing population or the need to promote active travel among older people…cycling should be seen as a healthy means of transport for older people.'

Limerick Cycling Campaign suggested five health recommendations for LSMATS, 'inclusion of positive health outcomes as a strategy outcome of LSMATS, modal share projections for air pollution levels, target modal share of population over 65 cycling regularly, breakdown of health outcomes in disadvantaged areas and relation to connectivity and Section 7 should be amended to include a section clearly identifying cycling for those with disabilities.'

Further recommendations noted in a submission included, 'the promotion of active modes of transport i.e. walking and cycling for children to school, sports clubs and other activities, the provision of 2-metre wide pathways and combined zebra/cycle crossings to all schools from residential areas… segregated cycle lanes.'

Another submission requested 'funding of community based active travel, initiatives for this specific section of our population [over 65] to encourage exercise, activity, socialisation and good mental health.'

Several respondents requested that LSMATS link modal share targets for walking and cycling to public health outcomes.

20.3   Safety

One respondent noted that cycle lanes on the Shannon Bridge could be safer, suggesting 'at the moment it is an accident waiting to happen.'

It was stated in several submissions that people with disabilities and cyclists should not share the same area, 'the risk of injury and accident is too high.' Adding to this it was mentioned in relation to BusConnects, 'while BusConnects is welcome it should not run through the core of the city centre and where cyclists share the road with buses on BusConnects routes the cycle lanes must be segregated. Otherwise it's simply not safe or appealing and people will refrain from cycling.' While another respondent noted 'an occasional slow, careful cyclist on a footpath is not a major problem. But when large numbers of commuting cyclists can travel at top speed on the footpaths, that is a major problem for pedestrians, especially people with sight loss, and other disabilities.'

The Limerick Green Party suggested 'particular attention should be paid to the extent to which routes are "joined-up" and allow for the feeling of safety along the whole course of a journey, especially at junctions, intersections and roundabouts.'

Regarding safety and schools, it was mentioned that 'LSMATS presents a contradictory message in seeking to provide safe and active travel to all schools while at the same time increasing private motor vehicle traffic. Increased private motor traffic will prevent safe active travel to all schools.' Another submission stated, 'The

strategy must include provision for school streets and school zones for every school in Limerick to ensure that children can walk, cycle and scoot safely to and from school.'

20.4   Economy

The importance of Shannon Airport as being an economic driver in the region was discussed extensively by a business organisation, they noted 'in finalising the LSMATS, it is critical that the long-term importance of Shannon Airport and its role as an economic driver for both the mid-west region and the nation as a whole is emphasised explicitly, and further recognise that there is an requirement to ensure that adequate strategic infrastructure, which connects Shannon Airport to the wider region, including Limerick City and County as well as the existing strategic landbanks…is a fundamental component for the future growth of the airport and supporting the premise of National Strategic Outcome.' They also noted that 'high quality international connectivity is crucial to the region for overall international competitiveness.'

The Regional Spatial and Economic Strategy for the Southern Region was quoted numerous times in submissions in relation to achieving compact growth, 'regions should prioritise housing and employment developments in locations within and contiguous to existing city footprints where it can be served by public transport.'

UL noted 'the LSMATS recognises that many of the main employment centres are clustered together outside the City centre, such as Raheen, National Technology Park and University of Limerick. This existing pattern has to be accommodated in any successful transport strategy. The University of Limerick has one of the largest landholdings in this outer City area. It also has the only developed landholding that stretches across the River Shannon, connecting County Limerick & County Clare.'

The Land Development Agency noted the importance of the Colbert Station Quarter which 'has the potential to both house a significant number of people but also act as a business/employment generating hub. This could increase the demand to travel both within the city centre and from the suburbs to Colbert Station Quarter and vice versa.'

One respondent requested the strategy 'pay special attention to the provision of night-time transport links. The provision of a much better night bus service is, I believe, an essential action that must be taken in order to allow Limerick's night time economy to grow and improve. Better night buses from Dooradoyle, Corbally and Castletroy would offer an excellent means to develop the city's economy in the evening time.'

20.5   Response

The LSMATS will be funded from a wide variety of sources, primarily the National Development Plan and local government capital expenditure programmes. These, in turn, can look to sources such as the European Investment bank and other European programmes. This is set out in the draft LSMATS.

In relation to the balance between investment in roads vs sustainable mode, it is considered that the capital spend within the strategy provides for all modes of travel. Furthermore any expenditure on road infrastructure will provide significant improvements for travel by sustainable modes, such as cycling and travel by bus, as well as travel by other vehicles and freight movement. The expenditure on public transport and cycling networks also provides for a significant improvement on bus priority infrastructure and also improvements to the rail network. The overall investment will cater for the predicted demand for travel by sustainable modes within the strategy period, however it also establishes a network that will continue to cater for additional growth in demand for travel by sustainable modes beyond the strategy period.

In relation to health, the LSMATS provides for the development of a comprehensive cycle network for the LSMA facilitating a significant proportion of all trips to be undertaken by this active mode. It also provides the basis for significant investment in pedestrian infrastructure to promote walking. The development of a bus network for Limerick City and Suburbs with full priority will reduce journey times and make this mode more reliable, reducing stress.

With regard to the economy of the LSMA, the LSMATS sets out the appropriate level of transport investment required to enable the economy of the region to function and prosper. It does this primarily by providing sustainable alternatives to the car thereby offering people the choice to travel without experiencing the effects of congestion. This will enable the city and other centres to grow in terms of population, jobs, education and other uses. The draft LSMATS approach will ensure these alternatives adequately serve locations such as Raheen

and the NTP as well as the city centre, and also sets out a framework for the management of car traffic through behaviour change initiatives.

The LSMATS sets out the framework for increased investment in public transport services, including night-time services which will facilitate growth and development across a range of uses which operate beyond the traditional peak hours for transport, such as venues, cultural attractions and restaurants.

21. Alternative Modes

21.1   Micro-mobility

Several submissions expressed support for micro-mobility and encouraged the Strategy to develop this opportunity further. Loveable Limerick suggested Limerick's metropolitan area would be suitable for 'last mile micro-mobility options' and submitted a supportive thesis on this topic.

The Shannon Chamber supported the inclusion of electric scooters (e-scooters) as an acceptable and viable mode of transport in the Strategy. The Chamber stated, 'this mode of transport with be especially suitable to Shannon and greatly assist in linking the various strands of the town.' The Southern Regional Assembly stated many European cities utilising e-scooters as a successful new mode for green mobility 'allowing a further range than cycling alone and share schemes, similar to bicycle share schemes.'

The Clare PPN noted the current increase in electric powered micro transport options (scooters and electric bikes) and recommended that LSMATS take the increase in the usage of such methods into account in their plan in particular for urban areas where they are predicted to increase their market share considerably. 'We would like to see the potential for multi-modal trips being addressed in future transport modelling, identifying active travel - public transport connections to serve the people in the area - both in rural and urban centres.'

The Green Party requested that the Strategy provide more consideration to the rising development of electric bikes and other e-mobility devices. The Party stated, 'a significant shift to these modes, as we are seeing in cities with advanced cycle infrastructure, will greatly reduce the numbers needing to travel by car, and this will have a knock-on impact on the need for infrastructure to support the private car.' A respondent supported the sentiment that e-scooters would improve the switch away from private cars and stated that e-scooters should be permitted to share cycle lanes.

The Limerick Chamber stated that around 50 percent of all trips in Ireland are five kilometres or less, and therefore there is undeniable potential for smaller-than-car transportation. The Chamber stated 'micro-mobility solutions can help fill in the gaps between public transportation and help make mass transit more attractive' and recommended that the Strategy supports micro-mobility as a core element of Limerick's transport system.

A business owner suggested that the Strategy explore the use of "e-scooters" for rent, similar to the Bike Share scheme.

21.2   Autonomous Vehicles

The Shannon Chamber suggested that the Strategy support 'the development of the Connected Autonomous Vehicle (CAV)/Mobility as a Service (MaaS) sector in the Shannon area including Unmanned Ariel Vehicle (UAV) R&D.' The Southern Regional Assembly welcomed the inclusion of the CAV in the Strategy and supportive measures, 'Shannon is leading the field in autonomous vehicle technology through the Connected Autonomous Vehicles Ireland (CAV) cluster and development centre.'

The Shannon Group echoed these sentiments and added the Strategy 'recognise the potential of these transformative and disruptive technologies and support the development of the RD&I needed to advance this industry sector including national and local sustainable mobility initiatives.' The Group provided details on the synergies between the Software Engineering Centre, Future Mobility Campus Ireland, and Unmanned Ariel Vehicle (UAV) testbed expansion.

21.3   Response

The LSMATS sets out a plan for significant investment in cycle infrastructure. All of this infrastructure can be used by bicycles, e-bikes, scooters and e-scooters, once legislation is enacted which permits the latter two to use the public road. The NTA acknowledges the potential for these emerging technologies to play a significant role in the LSMA's transport system and will support their use through investment in cycle infrastructure.

In relation to autonomous vehicles, the NTA is aware of this innovation and while their features in terms of sustainability and safety are noted, the core thrust of the LSMATS and NTA activity is to reduce single-occupancy car use overall, regardless of fuel type or technology.

22. Stakeholder Engagement

The following section outlines all comments made regarding stakeholder engagement. Topics discussed include the project team and information provided, public consultation process and stakeholder engagement.

22.1 Project Team and Information

Shannon Chamber noted that they were appreciative of the availability of the Project Team throughout the consultation and made reference to the presentation given to them by the Project Team. They stated that this sort of direct communication and interaction was beneficial for understanding and collaboration in order to gauge needs of respondents. The Chamber stated that input from its members has been insightful in formulating submissions of this nature, further noting that Masterplans and County Development Plans should inform the final draft of LSMATS.

A submission noted that resistance to change would be inevitable when publicising the strategy but engaging the community fully would reduce this. The submission asked that Limerick City and County Council 'must show leadership and commitment' in this regard.

22.2 Stakeholder Engagement

A respondent expressed that co-ordination with other major public and private projects including Environmental Improvement Schemes could help move the project forward. They stated that this 'will need to be supported at local level through a personalised approach, aimed at engaging groups of local people and providing them with full information on the merits of this promising new transport system.' A number of stakeholder groups were cited such as working families, commuters and business owners. They stated that the challenge of implementation will now be addressed by the Limerick City & County Council, working in conjunction with the National Transport Authority, Transport Infrastructure Ireland and other key respondents, to deliver on necessary land use consolidation objectives, securing capital investment under the National Development Plan, and the implementation of LMATS transport infrastructure, supporting demand management measures, to enable the full benefits of LMATS to be achieved.'

The National Disability Authority recommended that LSMATS includes a clear commitment to a sustained engagement process with a diverse set of respondents. They advised 'the NTA to continue this participation and engagement in a sustained manner throughout the development and implementation of the entire Strategy by establishing an advisory committee that includes persons with different disabilities, older people, architects, urban planners, IT professionals, representatives from the local authorities, representatives from communities living in urban, rural and isolated areas, and the NDA. This diverse level of expertise will help NTA and their collaborators to address the different impacts that the Strategy will have on the lived experience of all users of the built environment, public spaces, and transport services now and in the future.'

Limerick Chamber outlined that that UL and LIT had been engaged with, but there was no input from students themselves. They expressed that it is important to engage with students in both the design and implementation stages of the strategy due to the large impact on their lives. They noted that 'it is important to create a sense of ownership in these younger cohorts and the process of engagement should precede the final version of the strategy.' They called on the Project Team to deliver a number of targeted action plans within a year of the LSMATS publication. This would include a Stakeholder Engagement Plan 'that identifies opportunities for stakeholders to support behavioural change and encourage a greater shift towards active transport modes.'

Many submissions stated that they wanted to see further stakeholder engagement from the Project Team. Among those were Cllr. Pádraig Lohan and Deputy Kieran O'Donnell.

Limerick Pedestrian Network expressed that they had worked to drive engagement with LSMATS in the city by attending and presenting at public sessions and having one-to-one meetings with elected representatives and were disappointed with the level of engagement during the consultation.

Deputy Kieran O'Donnell stated that preparation of a revised strategy 'must involve in-depth rounds of consultation with key stakeholders and the local public in Limerick and Shannon before the final version is published.' He cited a briefing he attended with the Project Team where he requested an extension of the consultation period. He also mentioned another meeting he chaired to discuss the strategy and discussed some of the comments made at the meeting, such as that the strategy needed to be more ambitious, particularly in the area of rail.

22.3   Response

The NTA has continued to engage with stakeholders since the conclusion of the public consultation stage on the draft LSMATS and will seek to continue this engagement and expand it where possible during this consultation phase.

23.   Next Steps

All written feedback received by the LSMATS project team has been acknowledged, recorded, reviewed by the project team and is summarised in this Report.

The National Transport Authority has taken all views into account in the preparation of a revised draft LSMATS. An additional chapter is included in this draft summarising the consultation process that has been undertaken to date.