



**Limerick  
Chamber**  
Advancing business together

**Limerick Chamber**  
**Submission on Draft Limerick-  
Shannon Metropolitan Area  
Transport Strategy (LSMATS)**

October 2020

## Contents

<b>1.1</b>	<b>Introduction</b> .....	<b>3</b>
<b>1.2</b>	<b>The need for a vision led strategy</b> .....	<b>4</b>
<b>1.3</b>	<b>Understanding the impact of COVID-19</b> .....	<b>5</b>
<b>1.4</b>	<b>Transport can be used as a tool for ‘disruption’</b> .....	<b>6</b>
<b>1.5</b>	<b>Transport should promote social inclusion and youth engagement</b> .....	<b>8</b>
<b>1.6</b>	<b>Supporting carbon emission reduction goals</b> .....	<b>11</b>
<b>1.7</b>	<b>Ensuring implementation and delivery</b> .....	<b>14</b>
<b>1.8</b>	<b>Additional Observations</b> .....	<b>15</b>

## 1.1 Introduction

Limerick Chamber is the largest business representative body in the Mid-West, with over 450 member organisations who support over 50,000 jobs across the region. We have engaged in several briefing sessions with the both the National Transport Authority (NTA) and Limerick City and County Council (LCC) over the last 8 weeks. At a meeting with the NTA on the 7<sup>th</sup> October Limerick Chamber formally requested that further work on strategy formulation be paused and that the draft LSMATS be revised particularly in light of COVID-19. We believe that a second public consultation should be conducted in advance of the publication of the final document. Our reasons for this request are outlined in this submission along with several recommendations on particular elements of the strategy.

Transport sits at the crossroads of several important public policy issues. It contributes to economic growth and provides opportunities to enhance social welfare and wellbeing. As in most Irish cities, the vast majority of transport in Limerick is currently conducted in private vehicles. Limerick has experienced significant social progress in line with this growth in private car use, however at a European, national and local level there is now a greater understanding of the attendant negative impacts that accompany this growth. While access is critical, congestion in our major cities and bottlenecks on key national infrastructure routes hamper economic development.

Declining public transport services in many urban and rural areas contribute to social exclusion, while poor quality urban design leads to unsafe environments and city centre decline. This in turn undermines attempts to regenerate sustainable local economies and efforts to promote compact urban growth. These challenges are increasingly well understood and underpin the Chamber's concern that the draft LSMATS cannot hope to 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.
- Give any consideration to the impact of COVID-19 on long term travel behaviour.
- Align its strategy with Project Ireland 2040 and the Regional Spatial and Economic Strategy (RSES) in terms of supporting compact urban growth, thereby undermining efforts to revitalise the city centre.

- Explicitly identify how the transport strategy will support vital social concepts such as inclusion, accessibility, and wellbeing.
- Support the objectives of the newly published Climate Action (Amendment) Bill 2020 which includes a 7% year-on-year reduction in carbon emissions.
- Identify targets or commit to the delivery of targeted action plans across key areas, in particular relating to the role that stakeholders will play in influencing behavioural change.

## **1.2 The need for a vision led strategy**

Limerick is a City that is looking to the future and the draft LSMATS should reflect what we want to achieve, not just in terms of transportation itself but also how it relates to our shared environmental, health, social and economic future. How we deliver these transportation services is key to our success.

LCCC have recently commenced work on its local development plan for 2022-27 with the process expected to continue for 90 weeks. This LDP should be different in a number of ways as it is the first major policy statement to be produced by the City since the publication of Project Ireland 2040, the Regional Spatial & Economic Strategy and the Climate Action Plan 2030.

The most recent iteration of a vision for Limerick was the Limerick 2030 Economic and Spatial Plan. This was developed in the aftermath of the 2008-11 economic crisis as a blueprint for attracting investment and creating jobs – no consideration has thus far been given to issues such as climate change, sustainability and health. The plan has not been updated since 2015 and does not reflect recent work done by the council in these areas. 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.

### Recommendations

- In its current format the draft LSMATS is simply an infrastructure plan. Therefore, a vision for Limerick’s development should be identified so that both hard (infrastructure) and soft (behaviour) projects can be justified within a wider city development agenda.

- Restructure the draft LSMATS so that each chapter represents a specific objective for achieving an efficient transport system (e.g. efficient network; improved accessibility; community safety and health). As it currently stands each chapter represents a particular transport mode. Such a structure does not demonstrate the interconnectivity of each component of the transport system, nor how each element supports an overarching vision for development in Limerick.

### **1.3 Understanding the impact of COVID-19**

The Eddington Report (2006) represents one of the most extensive international studies on the connection between transport and economic development and highlights the possible outcomes of a successful transport system. One such outcome is that it “increases business investment and innovation by supporting economies of scale or new ways of working”.<sup>1</sup>

The draft LSMATS will not see this achieved for the Limerick-Shannon region as it does not take account of the long term impact of Covid-19 on travel patterns. The widespread adoption of remote working practices during the pandemic has resulted in a decrease in the number of individuals travelling to/from work. It is likely that increased levels of remote working will 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.

#### Recommendation

- Consider the impact of COVID-19 on both short-term and long-term travel behaviour patterns.

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<https://webarchive.nationalarchives.gov.uk/20081230093524/http://www.dft.gov.uk/about/strategy/transportstrategy/eddingtonstudy/>



The population figures in the *Transport Modelling Assessment* (p.29), show projected growth as being concentrated in the suburbs and county area. For example, population in the city centre (allowing for modelling sensitivity) is projected to increase by 70% (from 6,071 to 10,337) by 2040, whereas the population in Raheen and Annacotty is projected to increase by 128% and 103% respectively. Furthermore, population for the proposed South Clare Economic SDZ is modelled to increase by 3,330% from 379 to 13,000 by 2040.

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.

The NTA's future vision of Limerick is contradictory to the one held by stakeholders 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 planned developments such as Colbert Station and dismissing rail as a viable option.

The Chamber argues that LSMATS has a pivotal role to play in disrupting current population growth trends and that, by constructing a different narrative within transport policy, compact growth can be enabled.

### Recommendation

- Align population distribution projections 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.

## 1.5 Transport should promote social inclusion and youth engagement

The term ‘accessible’ extends beyond the need to deliver more transport choice and includes the promotion of social inclusion by ensuring accessibility to jobs, education, health and recreation. A recent report by the National Economic and Social Development Office, highlights the potential societal benefits from an integrated transport and community policy.<sup>3</sup> Montpellier is shown as a successful initiative that limited urban sprawl and created greater density in the city core through a policy which married the local goals of the city with the transport policy. The draft LSMATS in its current format does not address the potential for meaningful community change.

Despite committing to achieving “enhanced social inclusion through the provision of a more equitable transport system and wider public transport accessibility to areas of deprivation”, minimal reference is made to social inclusion in the document. 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 (albeit equally underwhelming) increase of 10.9%. This is noteworthy given that in 2017 eight of the top 10 unemployment blackspots in the country were in Limerick with an average unemployment rate of 35.7%.

The Green Party’s initiative *Just Transition* recognises the disproportionate impact that climate change policy has on different sectors of society. However, the draft LSMATS fails to identify the effect of the interventions on equity within society. The Southern RSES links social inclusion with infrastructure development with *Policy Objective 22* calling for specific intervention in the Limerick city RAPID areas. The draft LSMATS should therefore demonstrate a greater link between the role of transport development in these areas of the city, how it will contribute to both their development, and the mitigation of disproportionate impacts on the different sectors.

In addition to not acknowledging the role of transport in promoting social inclusion the draft LSMATS does not consider the needs of individuals with disabilities or the elderly.

Greater attention must also be given to the student population of Limerick city. Limerick city has an active cycling community who have successfully promoted cycling as a means to travel to school. The new Fianna Fail, Fine Gael and Green Party programme for government places

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<sup>3</sup> Transport-Orientated Development: Assessing the Opportunity for Ireland, 2019



heavy emphasis on the role that schools play in fostering positive transport habits among students with a vision for cycling training in all schools. The draft LSMATS places emphasis on the need for integration of schools in terms of a walking and cycling network but little detail is provided on how the vision will be achieved. It is suggested that a “comprehensive School Travel Strategy” is developed for the metropolitan area. As the transport strategy is long-term in nature with substantial growth forecast in the general and student population, it makes sense to have the school strategy inform the transport strategy, rather than adjust the population around the infrastructure plan as set out.

**Table 1: Proposed Education Population**

Metro Settlements	Population		Population Growth	
	2016	2040	2016 to 2040	2016 to 2040 %
Annacotty	1,036	1,693	658	63%
Ballinacurra	5,286	6,894	1,609	30%
Bunratty	131	168	37	28%
Caherdavin	484	1,443	959	198%
Castleconnell	196	637	440	225%
Castletroy	761	1,420	659	87%
City Centre	864	1,582	717	83%
Clareview	2,048	2,627	579	28%
Cratloe	258	311	53	20%
Dooradoyle	1,662	2,598	936	56%
Limerick North	2,469	3,235	765	31%
Limerick North-East	1,919	3,118	1,199	62%
Moyross	3,793	5,245	1,452	38%
Mungret	142	637	494	348%
Parteen	269	315	45	17%
Raheen	706	1,220	514	73%
Roxboro	1,833	2,660	828	45%
Rural	2,171	3,685	1,514	70%
Shannon	2,583	3,200	617	24%
Sixmilebridge	379	525	146	38%
South Clare Economic SDZ	1	502	501	49645%
University	8,916	11,302	2,386	27%
Westbury	2	156	154	7572%
<b>Total</b>	<b>37,911</b>	<b>55,171</b>	<b>17,260</b>	<b>46%</b>

Source: LSMATS Transport Modelling Assessment

It was not possible to identify explicit reference to the modelling of schools in the demand analysis or transport modelling. The population projections, again, appear to be dependent on many developments which are still not finalised and run contrary to local aspirations of compact urban growth. For example, Mungret and the South Clare SDZ student populations are expected to grow by 494 and 501 respectively whereas the city centre is only expected to grow by 717. If the Colbert Station development proceeds, it could add somewhere between

6,000 and 10,000 further residents to the city centre, with implications for how the design of transport functions with the schooling needs of an increased population.

There are almost 25,000 third level student in the metropolitan area. It is noted that the consultation process has engaged with institutions such as UL and LIT however there is no further input from student groups themselves. A strategy with a 2040 deadline will play a large part in the lives of those students who live within the MASP area and the future success of the climate change agenda will depend on the willingness of these younger cohorts to accept and adopt the changes that will come. There is an opportunity to create greater levels of engagement with student groups in both the design and implementation stage of the strategy. 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.

### Recommendations

- Include an ***Accessibility Plan*** that utilises transport as a tool to support social inclusion across disadvantaged communities and rural areas. This plan should also identify the needs of the elderly and individuals with disabilities.
- Include an ***Education Transport Plan***, for primary, secondary and third level education, that actively supports a reduction in school-run congestion and encourages more students and accompanying adults to use active transport modes. This Plan should ultimately commit to: (i) delivering safe, segregated cycling routes to all primary, secondary and further and higher educational institutions by 2025; (ii) implementing *School Streets* and *School Zones*<sup>4</sup> by 2025; (iii) specific cycling modal shift targets for each education sector; (iv) 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; (v) an annual review of the targets achieved and measures needed to address shortcomings with regular meetings including active travel advocacy groups and education stakeholders.

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<sup>4</sup> For example, launched in Fingal and Malahide in 2019

## 1.6 Supporting carbon emission reduction goals

The *Climate Action Plan* puts in place a mechanism for oversight of local authorities where they must produce a climate action plan every five years. Currently, the council produces a *Climate Change Adaptation Strategy* which is a high-level analysis of the risks to the locality from climate change, with flooding of fluvial plains the most pressing concern. However, this document fails to present local mitigation options such as reducing emissions, recycling initiatives etc. Similarly, although the main transport strategy document makes reference to strategic goals in relation to climate change, there does not appear to be any reference to micro-level initiatives or targets. Success in the climate change agenda needs detailed steps and guidance to direct the general public behaviour and although this is a strategic level document, some high-level targets would better inform the direction of policy.

**Table 2: Environmental Emission Summary (kgs)**

Scenario / Emission Type	Nitrogen Oxide & dioxide	Particulate Emissions	Hydrocarbon	Carbon Monoxide & Dioxide	Benzene	Methane	Butadiene
Do-Minimum	1,570.7	14.6	68.6	1,080,128.3	0.6	16.9	0.9
Do-Strategy	1,560.4	14.7	67.8	1,079,803.3	0.5	16.3	0.9
% Difference	-0.7%	0.1%	-1.2%	0.0%	-1.5%	-3.3%	-1.2%
Do-Strategy +	1,491.1	14.1	64.4	1,042,306.0	0.5	15.1	0.8
% Difference	-5.1%	-3.7%	-6.1%	-3.5%	-7.6%	-10.7%	-6.4%

Source: LSMATS Transport Modelling Assessment

Reduction in emissions will play a critical role in the success of the climate agenda, with little change anticipated in the Limerick metropolitan area as a direct result of the transport strategy. Indeed, the capital measures on their own could result in an increase in particulate emissions of 0.1% with further demand management interventions required to ensure some reduction in the emission levels. The draft strategy refers to a 20% reduction in emissions to 2020. These environmental forecasts to 2040 are therefore unambitious and at odds with the climate agenda. It is difficult to see how the transport strategy will play a part in the global goal of carbon neutrality by 2050 if it only plans to achieve a reduction of 3.5% by 2040.

There is a need for more detailed information on the emission outputs generated from the different types of strategies, with a more ambitious scenario considered where carbon neutrality is achieved by 2040. Limerick needs to be a leader in the climate change agenda for fear that the uneven economic growth of the region becomes further entrenched. Policymakers need to recognise the potential of “green” capital investment but also the disproportionate effect a poorly planned policy can have on different sectors of society. Recent UN research has shown how a “vicious cycle” of reinforced inequality can result from the effects of climate change through an exposure and susceptibility to damage, and an inability to cope and recover.<sup>5</sup> The Limerick Shannon Metropolitan plan fails to recognise the future conditions around social equality and climate change, and the role that transport will play in addressing these threats.

The Programme for Government 2020 recognises the urgency of the climate agenda and as such mandates local authorities to “carry out an assessment of their road network to see where space can be reallocated for pedestrians and cyclists. This should be done immediately”.<sup>6</sup> Sequentially, this process should precede the development of the transport strategy where greater priority and consideration will be given to the active modes.

**Table 3: Monetised Physical Activity Health Benefits**

<b>Net Impact per annum (€)</b>	<b>Do Strategy</b>	<b>Do Strategy +</b>
<b>Cyclists</b>	<b>€140,690.14</b>	<b>€852,719.69</b>
<b>Walkers</b>	<b>-€756,471.69</b>	<b>-€707,435.08</b>

Source: LSMATS Transport Modelling Assessment

The Programme for Government also states that capital expenditure in transport should apportion at least 10% to cycling infrastructure - the draft LSMATS commits 4.9% of the total spend to cycling (€69mn of €1,400mn). Furthermore, the cumulative effect of the current draft strategy foresees a monetised health loss of €700,000 per annum from decreased walking (see table 3) i.e. the transport strategy will mean less people walking. Similar to cycling, the programme for government aims for a 10% capital infrastructure spend on walking – the draft

<sup>5</sup> [https://www.un.org/esa/desa/papers/2017/wp152\\_2017.pdf](https://www.un.org/esa/desa/papers/2017/wp152_2017.pdf)

<sup>6</sup> Programme for Government, p.7

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.

The benefits of rail in terms of its impact on the environment is recognised under the Government’s *Climate Action and Environment* policy, which states 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 CO2 emissions per passenger compared to other modes of transport is significantly lower than motorised transport”.<sup>7</sup> The draft LSMATS dismisses rail as a viable option for Limerick’s development. This is surprising considering that a significant (underutilised) rail infrastructure system already exists in the region.

Without significant change there is a risk that this strategy will contradict efforts to promote Limerick as a healthy city. Private car has become the primary mode of transport for Limerick residents. The increasing numbers of cars have also led to rapidly flowing traffic and/or congestion, resulting in safety problems, declining amenities in the city centre, noise and pollution. It has been estimated that there are 1,700 new cases of childhood asthma as a result of traffic-pollution in Ireland every year. Limerick has the highest rate of incidence with 220 in every 100,000 followed by Cork (188 in every 100,000), Galway (170 in every 100,000) and Dublin (170 in every 100,000). The challenge for cities is therefore how to achieve accessibility to city centres and renew the environment while maintaining the viability of surrounding areas.

The LSMATS will therefore play a crucial role not only from a traffic pollution perspective but also in terms of achieving an increase in the number of people using active modes of transport. Obesity amongst children is becoming a prevailing issue in Ireland with a recent study finding that 34% of children between 6 and 12 years old admitted to University Hospital in Limerick are either overweight or obese.<sup>8</sup>

### Recommendation

- Revise the methodology underpinning the strategy so that it better supports efforts to achieve a green and healthy city.

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<sup>7</sup> <https://www.gov.ie/en/publication/climate-action-travel/>

<sup>8</sup> Flinn et al. (2012) “Children in hospital in Ireland - what do they eat and what do they weigh: a cross-sectional study”

- Conduct 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.

## 1.7 Ensuring implementation and delivery

The strategic thrust of any transport strategy should follow from the vision and analysis of a city's strengths, weaknesses, opportunities and threats. The LSMATS should therefore have a targeted scope where achievements can be measured using strong results-orientated indicators. This would allow for objectives to be clearly defined against definitive targets and timelines.

The draft LSMATS fails to identify targets beyond the delivery of certain infrastructure. Furthermore, the document does not provide a detailed proposed timeline for the short term implementation stage of the strategy. Limerick City and County Council have commented that a five year implementation plan will be published once LSMATS has been finalised. However, it is not considered an official part of the strategy and there will therefore be no public consultation in its development.

In its current format the draft LSMATS is simply a process led infrastructure plan rather than a vision led transport strategy. In light of this, we call on the NTA/LCCC to formally commit in the LSMATS to the delivery of a number of targeted action plans within 12 months of LSMATS publication. Recommended action plans include:

- ***Traffic Management Plan***, including a delivery strategy, to reduce transit traffic accessing the city centre.
- ***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.
- ***Stakeholder Engagement Plan*** that identifies opportunities for stakeholders to support behavioural change and encourage a greater shift towards active transport modes.

Each targeted plan should again identify objectives and targets along with specific projects (including non-infrastructure) that will be delivered over the lifespan of the LSMATS. In addition, there should be stakeholder engagement in the development of these targeted plans.

## 1.8 Specific Component Observations

### *Limerick Northern Distributor Road*

Limerick Chamber welcomes the recognition of the importance of the LNDR in the draft strategy where it is “assumed to have the following functions:

- To support bus, cycling and pedestrian priority measures in the Metropolitan Area by accommodating private vehicle trips accessing residential areas and employment destinations in urban Limerick, UL and other services;
- Provide direct connectivity for the private car and public transport from Shannon and UL, the NTP and the SDZ;
- Provide for potential bespoke bus services from Galway and Shannon Town and International Airport to UL, SDZ and the NTP;
- Provide an additional access point for traffic and potential public transport from the M7 to UL and the NTP without the use of the Dublin Road and Plassey Park Road;
- and Provide multi-modal connectivity to cater for demand from Clare and Galway to UL and the NTP”

The draft LSMATS states the LNDR will be completed in the medium term (7-11 years). However, the inclusion of the following statement in the background reports to the strategy (Transport Options and Network Development Report) is concerning:

“The modelling analysis undertaken as part of the strategy highlights the challenges of delivering the LNDR as it has the potential to undermine the sustainable transport mode share for Limerick City if delivered in advance of the sustainable transport interventions, as discussed in Section 3.5 and in Section 5.2 of the Traffic Modelling Report. On this basis, it is recommended that the LNDR not be delivered in advance of the substantive public transport elements of the Strategy, and that its provision is also linked to the delivery of substantive elements of Clare South East SDZ.” (p.67)

The Chamber believes 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. Due to the structural dimensions of the road it will not be possible to have full bus priority along this route. LCCC have noted that they intend to use a mix of junction systems and traffic diversion to allow for bus priority at certain points along the corridor, however without the removal of transit traffic from this route the efforts to increase bus usage will be undermined. The LNDR should therefore progress in tandem with other public transport and active mode developments.

### ***Micromobility***

The draft LSMATS does not support the development of micromobility. Given that around 50 percent of all trips in Ireland are five kilometres or less, there is undeniable potential for smaller-than-car transportation to enable more convenient and more flexible local mobility while creating greener, more connected and less congested cities. Micro-mobility solutions can help fill in the gaps between public transportation and help make mass transit more attractive, so more people will choose it over driving their cars. In turn, this can reduce traffic congestion, parking issues, and other urban problems.

Given its geographical layout and student city status, the Chamber believes that micro mobility should be a core element of Limericks transport ecosystem. The Programme for Government includes a commitment to legislate for e-scooters and as such it would be remiss of the NTA not to account for the development of this mode in its strategy.

### ***Modelling***

The NTA and LCCC have confirmed that the modal shifts as presented in the main strategy document are not targets but outputs from the modelling process. This disconnect between targets and outputs needs to be addressed and alternative methodologies should be explored to present a range of realistic targets. Local stakeholders are justifiably concerned that the unambitious model outcomes cited in the draft LSMATS will lead to complacency in the transport agenda.

The Chamber understands that specifying different targets to be achieved is not always easy. However, by the City making reference to previous achievements, past trends and the future



potential for change, the targets could be set at levels that are achievable but sufficiently challenging to make a difference.

In the context of the modelling process, Limerick Chamber has the following concerns:

- The *Baseline Conditions and Policy Context* document notes that some data used for the NTA's Mid-West Regional Model is from 2012 (with an update for 2016 data underway at the time of writing the report). The Chamber appreciates the difficulty in acquiring up to date data however, it is unlikely that data this old will appropriately reflect active transport usage in the Limerick-Shannon region.
- Active Transport Modes were not calibrated
- The Cost Benefit Analysis is 2.8:1 (at a discount rate of 4% rather than 5% as was the case in CMATS). This is quite low in terms of the overall cost of the strategy.
- Micromobility is not included in modelling
- There are unexplained differences in the projected population figures reported in the Demand Analysis report (p.7) and the Transport Modelling report (p.27/28).

### ***Bus Corridor on O'Connell Street***

It is proposed in the draft LSMATS that the main bus corridor in the city centre would be situated on O'Connell Street. Limerick Chamber supports the LUROC project and the pedestrian priority of our premier Georgian and retail street in the city centre. The Chamber is supportive of the removal of high volume, high speed transit traffic from O'Connell Street and is supportive of prioritising public transport while ensuring low level access for private car trips where the city centre is the end destination.

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 impact of the proposed density of buses on O'Connell street and do not believe it should be utilised in this way.

The Chamber believes that the LUROC multi-million euro investment in public realm improvements on O'Connell street with the aims of creating ambience in city centre and

enhancing citizen and visitor experience and enjoyment of our Georgian architecture, would be undermined by high volume bus traffic.

As such the Chamber requests 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.