

Limerick Chamber Submission on the Revised Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)







#### Introduction

Limerick Chamber would like to thank the National Transport Authority (NTA) and other stakeholders for the opportunity to submit our view on the revised draft for the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) 2040. Limerick Chamber commends and welcomes the hard work undertaken by the NTA and other stakeholders in taking on board the concerns of the community with the previous draft of the LSMATS. The work and consultation undertaken is clearly visible in the ambitious nature of the revised draft of the LSMATS.

Limerick Chamber is the largest business representative body in the Mid-West, with over 400 member organisations who support over 50,000 jobs across the region. Championing business growth and investment, Limerick Chamber is dedicated to fostering a thriving Limerick and Mid-West.

As part of Limerick Chamber's process for developing this submission on the revised draft of the LSMATS, we facilitated reconvening the Limerick Transport & Mobility Forum. The forum is made up of a diverse range of people from across Limerick, including those representing large public and private sector employers to various educational and civil society groups dedicated to improving cycling, walking and other transport infrastructure across the county. Limerick Chamber would like to take this opportunity to thank forum members for their engagement and sharing of perspectives to ensure the best possible outcome for Limerick.

Limerick Chamber welcomes the inclusion of several new / improved components in this revised draft. The detailed provision of walking and cycling facilities are an important and welcome improvement given the role they will play in reducing the regular use of private cars, especially for short trips during peak congestion times. The improvement of the National Safe to School Programme alone has the potential to alleviate a strong proportion of current congestion through the introduction of safe methods of travel for school kids. The inclusion of rail in this revised draft is another promising feature for Limerick and the LSMA. Limerick Chamber believes that improved connectivity will be a crucial support to economic recovery and sustainable economic growth in the Mid-West region.

Limerick Chamber also welcomes plans to introduce smart-ticketing across all transport types. Convenience will play a key role in attracting more frequent use of public and active transport, and this initiative to introduce smart-ticketing will play a key part in this. Finally, the inclusion of Park & Ride and Micro-mobility sections are a welcome reflection of changing travel patterns post-covid. The inclusion of new sustainable transport options not included in the previous draft is an encouraging sight.

While the ambitious nature of the revised draft of the LSMATS is most welcome, the key to a successful strategy is implementation.

# **Improved Road Usage**

Limerick Chamber welcomes the changes in LSMATS to incorporate more environmentally friendly and sustainable travel methods. Measures to address the high level of car dependency in our relatively compact metropolitan area are critical and must be implemented at speed. Increased space on existing road networks should be prioritised for sustainable transport options to support modal shift and changes in commuter habits for those for whom walking, cycling, scooting and public transport are a viable option.

Unfortunately, many of the thousands of people commuting daily into our metropolitan area are travelling from great distances across the county. While every effort should be made to facilitate those who can choose alternative transport modes, we must acknowledge that there will continue to be a relatively high usage of private cars in the short-medium term.

Feedback from Limerick Chamber members outlines the need for easing of traffic congestion in Castletroy and Annacotty, particularly at the Newport / Mackey Roundabout which grants access to the National Technology Park (NTP). In recent years Limerick Chamber has advocated for the implementation of a Limerick Northern Distributor Road (LNDR) to alleviate traffic congestion in the NTP and support greater links between Higher Education Institutes (HEIs). We note the removal of the LNDR from the current draft of the LSMATS. It is our continuing view that a Northern Distributor Road would be essential should approval be granted for a South Clare SDZ. It is imperative that any new town to the north of the University of Limerick is fully supported by adequate access by road and that further pressure is not placed on the existing access points through the NTP.

Current congestion levels around the Castletroy / Annacotty area are of great concern to Limerick Chamber. Limerick Chamber believes that the LSMATS should include a provision to alleviate this congestion using a slip road from the NTP to the Newport / Mackey Roundabout. A slip road into the park would improve movement of traffic from the M7, alleviating the dangerous levels of congestion and queuing on the hard shoulder of the motorway during peak hours which is of serious concern for employers. While Page 109 offers a potential alternative to a slip road at the Newport / Mackey Roundabout, in the form of a Park & Ride facility, Limerick Chamber recommends that a slip road also be pursued in tandem.

The revitalisation of O'Connell Street is a long-anticipated investment in public realm at the heart of Limerick City.



The project is expected to be of support to the existing retail and hospitality businesses in the city centre, however, it is also expected to be a critical project in the broader rebirth of the city, enhancing the appearance and operations of our primary boulevard and signalling a focus by Limerick City and County Council on enhancing Limerick as a destination to live, work and visit.

In 2019 when the project was approved it was envisaged that the operations of O'Connell street would include dedicated public transport lane(s). Limerick Chamber was of the view at that time, expressed in our first submission on LSMATS from 2020, that one lane should be designated for public transport and that one lane should be retained for private vehicle access. Draft two of the LSMATS notes plans for atwo-way system for buses through O'Connell Street upon the completion of the O'Connell Street revitalisation project. Limerick Chamber is vehemently opposed to the operation of the space in this manner. The frequency of buses envisaged for O'Connell proposed three buses with Street, a every two minutes is completely unsuitable for the primary Georgian boulevard in our city. Such use of the space would negatively impact on public enjoyment of the street and undermine significant investment made to date, as well as business community and civil society groups efforts to enhance the attractiveness of Limerick City for residents and visitors alike.

Following the onset of Covid-19 and its devastation on Limerick City Centre, Limerick Chamber commissioned an independent study by Indeconseeking recommendations on measures to ensure the sustainable development of Limerick City. Entitled 'The Future Development of Limerick City' the report was published in June 2021. Key recommendations from the report are for increased measures to support residential occupancy and 'livability' of the city centre. The report places great emphasis on public realm improvements and increased pedestrianisation.

Furthermore, Covid lockdowns haves fundamentally changed how people and businesses value public space. Limerick people are spending more time outdoors than they did previously. Since 2020 enhancements to outdoor lighting along the riverbank promoting the three bridges walk, temporary pedestrianisation of blocks of Catherine Street, temporary pedestrianisation of Sarsfield Bridge and areas along the quays, and other measures in support of greater space for people to walk and cycle, have been greeted as successes by residents and most businesses. As a society, Limerick now places more value on our outdoor public space.

Limerick Chamber believes that the recommendations from the Indeconreport for measures in support of livability, and the strong public appetite for such changes to the use of space warrants a review of decisions on the proposed operation of O'Connell Street when the Revitalisation project is completed. Limerick Chamber believes that consideration should be given to creating a pedestrianised zone over core blocks and the removal of vehicular access to adjoining streets. The pedestrianisation of core blocks, connecting lower Thomas

Thomas Street and Bedford Row, should be accompanied by significant greening, with a "green spine" on O'Connell Street providing a natural canopy for pedestrians. The opportunity to provide more public space back to pedestrians and cyclists early in this transport strategy will help lay the foundation to encourage more transport activity of this type going forward as well as engendering a more liveable city. A traffic management and deliveries plan must be drafted and implemented in conjunction with operational changes to O'Connell Street to ensure the efficient movement of vehicles and deliveries around and through the city.

It is important going forward that placemaking plans are prioritised and inform traffic management plans rather than vice-versa. A welcome note in the revised draft of the LSMATS is the potential to introduce lower speed limits for town centres and Limerick City Centre. This can produce several positive outcomes, with less noise pollution and the provision of safer space for those walking and cycling within the city centre. This also has the potential to act as a deterrent for private cars entering the city centre as a means of 'passing through' which has been a common issue for Limerick City Centre over the last decade.

The prevention of Heavy Goods Vehicles (HGVs) entering Limerick City Centre between 07:00 and 19:00 is welcome. Limerick City Centre has a unique asset in comparison to its surrounding suburban areas, the potential for a thriving all-day economy. However, HGVs are still essential for businesses throughout Limerick City Centre, balancing the needs of the business community and the vibrancy of the city centre for visitors and residents will be a key factor going forward. Care must be taken when deciding the management of HGVs, too stringent restrictions could encourage businesses that rely on HGVs to locate outside the core city centre / Central Business District (CBD) which may result in a further exacerbation of the donut effect seen in Limerick in the past. We recommend that in conjunction with a traffic management plan that a delivery strategy also be conducted for the city centre to ensure efficiency of delivery with minimal disruption to other city centre users / residents. In addition to this, free parking in these retail centres outside the city could further entice consumers to these areas at the expense of the city centre.

Section 9.1.3 looks at high-capacity corridors in the LSMA. The absence of Corbally as one of these corridors is of concern for Limerick Chamber. The Corbally area is home to a considerable proportion of residents with limited transport routes to the city centre and other parts of Limerick and Clare. The provision of sustainable and active transport modes as an alternative to short private car journeys will be crucial to alleviating the prominent levels of congestion in the area. Within the Corbally area there are several schools to which residents travel to, all within walking and cycling distance. Finding the appropriate method of transport for the appropriate type of journey needs to be a key feature for the area of Corbally and the wider LSMA. The expected provision of

a primary cycling route from the city centre to Westbury and Ardnacrusha is welcomed along the Corbally Road. However, Limerick Chamber recommends the provision of appropriate Park & Ride and bus facilities for those not travelling a short distance.

Given Corbally's proximity to Kings Island and specifically St. Mary's Park, there is the potential to join these two communities with the use of a bridge, this will allow St. Mary's Park to become more open rather than the existing cul-de-sac. However, any potential bridge must take care not to create a "rat run" through St. Mary's Park and must be used to create a more porous use of land. For Corbally, there is the potential for a new rail station on the Parteen line which could remove cars from the road. The existing track loops around parallel to Childers Road into Colbert Station. This will be discussed more in the rail section. Using this rail line in conjunction with a bridge will open transport opportunities to King's Island.

The electrification of vehicles on our roads will play a key role in the reduction of emissions and Greenhouse gases. We have seen progression in this area with An-Post using fully electric vans while the Bus Eireann fleet in Limerick is currently transitioning to fully electric. Government targets set almost 1 million as the number of electric vehicles expected to be on Irish roads by 2030. This is referenced in this draft, however there are no specific targets set for Limerick and the LSMA. While we understand the implementation of charging stations is largely the responsibility of the ESB, Limerick Chamber recommends that a clear strategy be put in place under the LSMATS to earmark certain areas for the increased provision of EV parking spaces and charging stations with key targets based off EV uptake across the LSMA.

Given Limerick Chamber's proposed changes to the operation of O'Connell Street we recommend that a full impact assessment on congestion, business and residents be undertaken prior to any decision made on the future of Sarsfield Bridge.

#### **Improved Road Usage Recommendations:**

- Introduce a slip road, between the Newport / Mackey Roundabout and the National Technology Park to alleviate dangerous traffic congestion as a matter of urgency. In conjunction with these other measures such as segregated cycle lanes to facilitate greater active and micro-mobility travel options should be included.
- Removal of plans for two-way bus lanes on O'Connell Street, which is completely unsuitable for this location and at odds with significant efforts by various business and community groups to create a destination at the heart of the city centre.
- Review plans for operation of O'Connell Street with a view to pedestrianising core blocks for an enhanced visitor and resident experience. Including significant greening to enhance a sense of well-being for visitors and provide a natural canopy when leaves are present.

- Given the frequency of proposed buses proposed in the LSMATS mitigation measures must be put in place as part of the LSMATS to counter the potential for bus gridlock due to the frequency and volume of buses.
- Introduction of a comprehensive traffic management plan that is informed by place-making plans, and delivery strategy, to ensure efficient movement of vehicles in and around the city while removing through traffic.
- Examine the feasibility of a Park & Ride facility / mobility hub for people travelling from Corbally and Ardnacrusha as well as other rail and bridge options.
- Increased provision of EV charging points and parking spaces based on projected demand.
- Review of draft plans for operation of Sarsfield Bridge as public transport only, in conjunction with identifying alternative routing for city centre bus corridors.
- While Limerick Chamber supports reduced private car usage and increased public transport usage, it is our view that the introduction of congestion charges for the city centre ahead of roll-out and successful implementation of the other measures in the draft LSMATS would be premature.

#### **Rail Travel**

The use of sustainable transport will play a core role reducing the dominance of private cars throughout Limerick City going forward. Limerick Chamber welcomes the inclusion of a rail section in the revised draft LSMATS. While Limerick Chamber commends the ambitious use of rail travel in the revised strategy, there is potential for expansion. Currently, there are plans to open two new rail stations at Ballysimon and Moyross. To fully capture the potential that rail offers the LSMA, more locations should be sought in the initial phasing of the rail strategy. There is a significant asset in Limerick with the presence of unused rail infrastructure. If a reduction in private car usage is to be achieved, then further provision of rail must occur.

Previous updates to the NDP in October 2021 suggested an ambitious rail strategy for Limerick, with stations in areas of high congestion such as Corbally, Mungret, Parkway and Dooradoyle. While some of these areas are referenced in this draft, there is no commitment made to advancing these plans. Instead, they are noted as being 'potential' sites and will be kept under review. Limerick Chamber strongly believes that a train station in Corbally and Raheen should also be included as part of LSMATS. These are two areas of strategic importance with thousands of people commuting daily from and to these locations. Limerick Chamber believes these locations should be prioritised along with Ballysimon and Moyross. A train station in Corbally could use the existing Parteen rail line which links into Colbert Station.

There is the potential that in Corbally land consolidation efforts



could be taken to build a new train station off the mill road. Currently, the National Asset Management Agency (NAMA) owns c. 2.75 hectares of state-owned land adjacent to the mill road. Its proximity to the River Shannon could have flood implications, however, if suitable, utilising this land would ensure an efficient use of state-owned land.

# **NAMA Land Corbally**



(\*Note\* the above is based on most recent available public information and may not be reflective of any change since or before)

The inclusion of Measure FDS3 acknowledging the intention of assessing the feasibility of rail freight from the port of Foynes to Limerick is welcomed. Foynes, like Shannon Airport, is an important asset for the Mid-West region and infrastructure developments will support development of industry at the port and help attract further investment into the region. It is expected that Foynes will become of increasing national importance in the coming decade with the development of renewable energy activities there. The existing line from Colbert Station to Foynes cuts through Hyde Road, Rosbrien to the back of Dooradoyle, Raheen Business Park, Patrickswell, Adare and Foynes. Limerick Chamber recommends that this line be used for passenger travel as well as freight. Using the existing line for passenger journeys connected through Colbert Station as the central node would link up key areas of the city with Dooradoyle and the Raheen Business Park. To fully develop the rail sector, a multi-year strategy for each station and line with timelines and metrics to monitor progression in its development, and performance upon their completion must be included. Limerick Chamber recommends stronger wording around the current commitments to improve and upgrade existing stations.

The draft strategy currently notes that these upgrades and improvements 'will be considered', however, given their strategic importance, not to mention the wider implications of the cost-of-living crisis and the energy crisis, it would be appropriate to consider them as part of this current strategy. The focus on developing rail in Limerick must include all of the strategic areas and must be advanced at speed.

Another area of concern for Limerick in relation to the rail strategy is the language supporting the delivery of a rail link to Shannon Airport. Limerick Chamber would like to see a firmer commitment for delivering this rail link. The announcement of a potential rail link to Shannon Airport was a welcome inclusion in the updated NDP, with the potential to make it the only airport in Ireland with a rail link. Shannon Airport is a significant asset for the Mid-West region, both in terms of attracting FDI and tourism to the region. Connectivity to Shannon Airport has been sub-par over the last number of years, with infrequent bus services being the only connectivity from Limerick City. While the commitments made regarding bus connectivity in this draft strategy are welcomed, the inclusion of a rail link has the potential to be a gamechanger for the Mid-West. Similar to the potential train stations at Corbally and Parkway, there is no firm commitment to developing this connection. Measure RL3 only commits to examining the feasibility of a new line to Shannon. Limerick Chamber would like to see this feasibility study carried out as a matter of urgency. The congestion issues at Dublin airport since reopening of the country in 2022, highlight the need for better use of regional airports which have significant unused capacity. Regular public transport connectivity to Limerick, Galway, Ennis and beyond would not only be of support to existing passengers but also for airport operators to win new routes facilitating further utilisation of the state-owned asset.

A targeted increase in rail boardings and alightings between 2016 & 2040 of 48% has been set. Accountability will be one of the most important factors in the delivery of this transport strategy. Upon feedback from Limerick Chamber members and other key stakeholders in Limerick City, segregated (project by project) targets for multiple parts of the transport strategy must be set. This includes the rail section. If targets are to be met, short-, medium- and long-term goals must be included in the draft, along with 3/5/8/10+ targets to ensure delivery in a timely fashion throughout the lifetime of the strategy.

The intention outlined to provide a dual track between Limerick Colbert and Limerick Junction is welcome. While ultimately the ideal scenario would be no disembarkment at Limerick Junction the dual-track approach should introduce journey efficiencies in the interim. Furthermore, Limerick Chamber welcomes the transit-oriented development approach outlined in the revised LSMATS with land use targeting the network of rail stations.

Limerick Chamber recommends a focus on waste reduction within any new rail system. Therefore, we would like to see a smart ticketing system whereby one off or regular journeys could be provided through an in-app electronic ticket system or integration with a long-term travel card such as the Leap card. We acknowledge that this system will not suit some people so the possibility to purchase physical tickets must remain, but electronic or long-term card use should be encouraged. In conjunction with this, the inclusion of Real Time Passenger Information (RTPI) in the revised LSMATS is welcome – Limerick Chamber recommends that this can be monitored through an app and not only physically at a train station and this should form part of a wider transport app including buses and active travel measures for Limerick.

# **Rail Travel Recommendations:**

- Introduce a rail station in Corbally using the old Parteen line and possibly in conjunction with NAMA owned state land.
- Utilise the Colbert Station to Foynes line for passengers given its ability to link Raheen Industrial Park with other key residential areas of the city and hence reduce commuter car journeys.
- Project by project delivery targets within yearly brackets.
- Implementation of appropriate bicycle and other micro-mobility safe sheltered storage space at nodes of transport particularly new train stations. The need for long-stay parking is already acknowledged in the LSMATS.
- Implementation of an electronic (or long-term card) ticketing system through an app to reduce waste with the inclusion of RTPI in an app.
- Continually examine the feasibility of reducing the requirement to change station at Limerick Junction.

### **Bus Travel**

Increased electric bus services, connecting where people live, work, study and spend leisure time will have the greatest impact on facilitating large numbers of modal shift out of private vehicles.

The BusConnects program will be the core factor in dictating future bus routes / improved routes and thus encouraging the use of the bus as a common means of travel for journeys under 30 minutes. As per the latest revised draft of the LSMATS, BusConnects program for Limerick is expected to be delivered within two years of final publication of the LSMATS. Given rapidly increasing cost of living and heightened concerns regarding achieving climate action targets Limerick Chamber calls for the fast-tracked implementation of BusConnects for Limerick as an urgent priority. Cork received their transport strategy from the NTA in July 2021 with their BusConnects program announced just 10 months later indicating that a program for a smaller city such as Limerick should be achievable within the same if not shorter time frame.

Limerick Chamber welcomes the ambition to phase out private car usage from main roads in the city centre which aligns with our view that core blocks of O'Connell Street should be operated as pedestrian zones. As outlined earlier in this submission under "Improved Road Usage" Limerick Chamber strongly objects to the proposed usage of O'Connell Street as a two-way bus corridor and believe alternative streets should be identified for this important public transport routing. A balance must be struck between providing excellent access to city centre locations and the protection and support of O'Connell Street and riverside streets as important components of the experiential offering for residents and visitors to the city. We ask that further work is done to identify appropriate streets for the routing of buses, within and around our Georgian core.

The introduction of the Leap Card to Limerick in recent years

was an important step in making sustainable transport a more attractive option. Measure SM12 outlines plans to introduce smart ticketing in line with the BusConnects delivery to Limerick. This is a much-welcomed addition in this draft strategy. Furthermore, encouraging the use of multiple transport options in one journey (for example, bus to Bike Shared Scheme (BSS) as highlighted in section 16.10.5 through a potential 'Multi-Modal Fare Structure' will be important, so too will the subscription-based service. Both structures target different segments of the market, one for regular users and one for ad-hoc, both are required to encourage more people to use public transport.

The inclusion of Shannon Airport in plans for several modes of transport is welcomed. Shannon Airport has the potential to expand its network, boosting its passenger numbers which have been impacted by Dublin Airports growing dominance over the last 15 years, while also lagging behind Cork Airport (pre-covid). Improving connectivity again creates an element of convenience for both tourists, residents and businesses, who in the past may have opted for Dublin Airport given its greater levels of connectivity to and from the airport. There is the potential to support regional balanced growth in this recovery period post-covid and connectivity will play a key role in this. It is important that the LSMATS is fluid and dynamic enough to take into account any future update or change implemented by a new National Aviation Policy focussed more on regional development and connectivity.

The expansion of the current bus service to a 24-hour service is a welcome inclusion in the revised draft strategy. The provision of 24-hour transport will contribute to the development of an 'all-day economy' in Limerick City Centre. To ensure efficiency and success of a 24-hour bus service, it is imperative that the service is provided to key population areas and not just "A" rated routes. Safety also is a concern on 24-hour services, in particular for female travellers and appropriate measures must be put in place to ensure safety of transport users throughout the night.

The provision of accurate and up to date bus timetable information is an area that needs improvement in Limerick. Currently, many bus stops do not have electronic boards with current bus times showing. Most bus stops have a static timetable attached to them currently, although some are outdated due to changes in scheduling. The new standard bus stop needs to be equipped with a real time electronic information board (similar to those in the University of Limerick and Sarsfield Street). The availability of RTPI on an app would also add value. The RealTime bus app was an encouraging step forward when it was released. Currently, the app identifies nearby bus stops via a 'google map-styled' home page. Limerick Chamber have previously highlighted the need for the inclusion of other means of transport in such an app. By highlighting the cycling, walking routes and train services etc. available to people, the app can further guide people towards the appropriate journey type for the appropriate distance.

The current modelling outputs suggest AM peak modal share of 12.6% for journeys by bus will be achieved by 2040. Cork's transport strategy targets an increase to 25.7% (from 10% in



2011), while Dublin is targeting an AM peak modal share of 23.9%. (up from 20%). The roll out of the BusConnects program is expected to significantly improve access and frequency to journeys via bus, Limerick Chamber therefore questions if this figure should be higher.

### • Bus Recommendations:

- Limerick Chamber recommends that BusConnects be fasttracked for the implementation of bus strategy in line with the program delivery in other cities.
- Implementation of an electronic (or long-term card i.e. Leap card) ticketing system through an app to reduce waste with the inclusion of RTPI in an app. This smart ticketing for the bus service, allows people to buy tickets before boarding a bus and implements a more 'hop on, hop off' Luas style service.
- Expansion of Shannon Airports bus network across County Clare, Limerick & Galway.
- Ensure that the 24-hour bus services key areas of population and not just "A" rated routes. It is also important that safety measures are included on night buses.
- Roll out electronic real-time information boards to all bus stops in Limerick, and where not possible, provide QR codes which can be quickly scanned to show the same information without the need to download an additional app.
- Improve the RealTime app to include information on bus & bike routes / Invest in technology to provide efficient means of travel such as a Limerick travel app that draws on the bus & rail information provided on the TFI Real Time Ireland app but also includes information on safe cycling, accessible walking routes, bike stations and e-charging locations.
- Set segregated, project by project timeline targets (i.e. 3/5/8/10 year) for bus use throughout the duration of this strategy.
- Limerick Chamber strongly opposes operation of two-way bus lanes on O'Connell Street and calls for alternative streets to be identified for the routing of buses within and around the cities Georgian core. Furthermore, Limerick Chamber seeks a review by Limerick City and County Council of plans for the operation of O'Connell Street, believing a strong case exists for the operation of core blocks as pedestrian zone connecting Bedford row and lower Thomas Street and creating a visitor destination in the heart of the city.

# **Active Travel & Health**

The emphasis on active travel is welcomed in this draft, given the suitability of Limerick to cycling as a means of transport due to its broadly flat landscape. Journeys by bicycle have the potential to replace a portion of unnecessary journeys by private car, for example a parent dropping their child to a school near their home. Such a change could potentially take a notable number of cars off the roads in the morning, reducing congestion during peak hours.

An area which needs improvement is the current Bike Share Scheme (BSS). Currently, this service has limited access with most stations being located within the city environs. The BSS

has the potential to be used as more than a 'last mile' mode of transport. It is noted in this draft that the expansion of the BSS outside of the city centre is unlikely, however the revised draft outlines the consideration of dockless bicycles in its place. This is a welcome recommendation and something Limerick Chamber supports. Recent improvements have already seen the provision of bicycle stations at the 2 of the 3 Higher Education Institutes (HEIs) in Limerick. If this scheme is to capture its full potential, then more availability needs to be made in areas of high residential density, along with places of work and education. Given the access routes from UL to Limerick City and the general size of UL's campus, more communal bicycles should be introduced. To encourage the use of this service more for trips to work and school, communal bicycles should be placed at high density residential areas such as Dooradoyle, Raheen, Corbally, Parkway, Annacotty and Castletroy. This method of bike hire could potentially make bike hire more accessible for people in Limerick given the absence of docking stations where the bikes must be left. Limerick Chamber understands that a byelaw for the provision of dockless bicycles in the Limerick metropolitan area was adopted in May 2022 and will come into force in June 2022. We welcome the implementation of this byelaw and commend the local authority and councillors for its adoption.

Monitoring progress will be a key factor across all types of transport for the duration of this strategy and beyond. One thing that Limerick Chamber would like to see introduced is the introduction of bicycle counters in tandem with bicycle lanes. There are 2 core benefits to these counters. Firstly, the number of cyclists will be monitored accurately and secondly, it will highlight to the public the number of cyclists on said path that day. These types of counters have the potential to act as a form of encouragement to people, visibly showing that they are contributing to a more environmentally friendly way of travelling. These sorts of bike counters are used in many European cities (including Dublin City) which have been successful in establishing cycling as a popular mode of transport.

The availability of appropriate facilities to encourage multimodal transport journeys will be important in this transport strategy. There is a commitment to provide long term bicycle parking facilities in this draft, although locations other than Colbert Station have not yet been identified. Sheltered and safe bicycle parking at future Park & Ride (P&R) locations should be of an appropriate level to encourage this use of travel. Any long-term bicycle parking facilities going forward must have appropriate surveillance and shelter.

Micro-mobility is a form of transport that has increased with popularity over the last two years. Under the Road Traffic Bill 2021, legislation was introduced for the use of e-scooters and e-bicycles (called powered personal transporters – PPT). E-bike providers can currently operate, with e-scooter operation expected to be allowed to commence in 2023. Renting e-scooters is a common feature among many European cities. Bolt, a commonly known micro-mobility rental start-up, has recently announced its plans to bring an e-bike rental service to Sligo. Limerick Chamber recommends that the LSMA

should be proactive in attracting micro-mobility start-ups to the region to further encourage the use of sustainable transport options. Limerick Chamber welcomes the inclusion to appoint a dedicated walking and cycling officer and this should be progressed as a matter of importance.

There are also further health measures that could be taken as part of rolling out the strategy. There could be the wide-scale rollout of using advertising boards for beyond a commercial purpose and could outline health benefits (long and short term) of getting off one stop early and walking the rest of the way, 10 minor changes to improve mental and physical health, and QR codes for support services. There is also the potential to partner with industry, the HSE and Health Ireland for e-health and other digital initiatives.

#### • Active Travel & Health Recommendations:

- Improvements to the current BSS by providing additional stations to expand range and accessibility. Now that dockless bicycle stations can apply for a licence in Limerick, we recommend a marketing campaign to signal to operators that they can now invest in Limerick.
- The monitoring of bicycle usage should be a point of focus. Tall, visible bike counters as used in other cities should be used to show and encourage bike usage on key routes as well as understanding usage statistics for strategic planning for future active travel infrastructure.
- Identifying appropriate bicycle parking facilities around Limerick should be included in this strategy. While the LSMATS process has allowed for consultation, it is suggested that proactively reaching out to key stakeholders such as active travel groups, businesses and schools around Limerick to target key locations would further enhance the plan. Bicycle parking should have appropriate safety measures in place to ensure continued use.
- Plans to attract micro-mobility start-ups and established companies should be included in this strategy including a marketing campaign. With e-bikes being able to operate currently and scooters potentially operating in 2023 now is the right time to promote the region as being ready for investment.
- Advance the appointment of a walking and cycling officer as a matter of urgency.

### **School Travel**

Limerick Chamber welcomes the changes made to address school travel in the transport plan, with the inclusion of the National Safe to School Programme being an important update. Changing the behaviour of school journeys has the potential to significantly alleviate traffic congestion. Most school related journeys (i.e. parents dropping a child to school) are short trips under 30 minutes. The introduction of safe methods of travel for schools will help promote these suitable ways of travelling for school kids and could remove a significant proportion of private car journeys. In this regard, the funding of school streets, school zones and the Safe Routes to School programme outlined in the revised draft of the LSMATS are all welcome.

Outlined in the LSMATS is an uptake in training, bicycle maintenance and road safety education in schools. An item that should be added to this training is the positive health outcomes associated with active travel over car use and also weather appropriate clothing to account for seasonality of Ireland's climate. However, it is important to mention that not everybody is in a position for active travel to schools because of mobility issues or distance to the school. These classes should be held with both parents and students in attendance. Schools should also be provided with sheltered and safe bicycle storage. More than half of children walk to school in Limerick, which is great to see, however this must be maintained and increased through the provision of safe walkways.

An item that is important to note is school capacity. The National Planning Framework contains a strategy to get people into cities to live in more dense communities. The LSMATS also aims to encourage people to live in Limerick City Centre and be within walking / cycling distance to the amenities that they need. A core decision when deciding to reside in a location is the availability of schools to parents / children. If we are to encourage more people into the city centre, then there will have to be a review of future education requirements in the city centre and this might possibly include the provision of new schools – particularly secondary schools. This is highlighted later in the modelling and population section.

The past modal share for cycling to school in Limerick City and Suburbs is chronically low. With the LSMATS outlining just 153 teenagers cycled to education in 2016 – only six were female. While the updated census figures for 2022 will shed more light on this, there is the need to increase this (which is what the LSMATS aims to do) but also encourage more female participation in cycling to school. In comparison, almost 3,000 students travelled to school by car. Furthermore, the mode share of cycling to education decreased from 9% in 1996 to 2.5% in 2016.

Section 19.5.2. notes the audit of cycle facilities serving schools and preparation of Safe Routes to School Programme. Limerick Chamber questions whether this should have been carried out in conjunction with this draft strategy. Providing timelines for important strategies such as this is important in order to keep accountability high.

It is important to note, not all children will be in a position to travel by active travel to school with parents dropping them off in cars and continuing their onward journey to their workplace. Analysing these trends will help provide more travel options for parents and children.

# **School Travel Recommendations:**

- Data suggests that a significant portion of daily journeys undertaken by private car in Limerick are for educational purposes (64.2%) removing the unnecessary car portion from this cohort will help alleviate congestion issues.
- In order to make active travel measures to school more attractive, 'front of school' treatments at the school gate must be implemented to improve access and alleviate congestion. Cycling



- and walking infrastructure must also be improved so too must the availability of safe and secure sheltered cycle parking.
- Include education on the positive health benefits of cycling to school with future training, bicycle maintenance and road safety education for. Education on weather appropriate clothing to account for seasonality of Ireland's climate should be included also.
- On the topic of health, improvements in school active travel infrastructure must be linked to help outcomes such as obesity trends etc. This should also include monitoring and mitigating air and noise pollution around schools this could be done in collaboration with the HSE. As part of the LSMATS data collection and monitoring on health outcomes should be provided for.
- The Safe Routes to School programme should cover all schools and not a small sample.
- Review the future education requirements in the city centre with the potential for a requirement of new schools – particularly secondary schools.
- Set segregated yearly targets for school kids/students cycling to school, to be monitored via survey, automated cycle counters or other means.
- Fastrack the audit of cycle facilities serving schools and the preparation of the Safe Routes to School Programme.

# **Parking**

Limerick Chamber welcomes the changes in this draft which include planned Park and Ride (P&R) facilities around Limerick. P&R facilities and mobility hubs have the potential to alter people's behaviour and incorporate a more sustainable transport option into a portion of their journey. These P&R and mobility hubs facilities will need adequate car park spacing, as well as other transport facilities including segregated bicycle lanes to access the location, secure sheltered bicycle parking with surveillance and appropriate and safe pedestrian access. While the 4 P&R locations included in this draft are in appropriate strategic locations, the omission of Corbally from the initial phase is a concern for Limerick Chamber given the high levels of congestion that exist in the area. Limerick Chamber recommends that a P&R location at Corbally be included along with the other 4 strategic locations. Section 16.2.1 notes that a P&R facility will only be considered in Corbally if the demand arises. Observing traffic levels on any given weekday at peak times visibly outlines the need for congestion mitigation measures. The presence of a P&R facility could potentially relieve the congestion in this locality with several dense residential areas such as Westbury, Ardnacrusha, Parteen and Shannon Banks contributing to high levels of traffic congestion, through journeys via private car. A P&R facility in conjunction with adequate cycling and pedestrian infrastructure and a frequent bus service will improve sustainable travel in the area and reduce congestion.

Illegal parking is an ongoing issue in Limerick City Centre, with cars regularly parking in unauthorised and dangerous locations, on footpaths blocking pedestrians and on street corners where they disrupt traffic flow, create congestion and dangerous blind spots. Under the revised draft of the LSMATS there needs to be an appropriate increase of both surveillance and enforcement to resolve this problem. We also recommend a marketing campaign to inform people of the appropriate channels to report illegal and dangerous parking so enforcement officers can take the necessary steps. The LSMATS, admirably, aims to engender an active travel and accessible city, this cannot be done when pedestrians, wheelchair users, cyclists and people with buggies etc. are blocked from using footpaths and bicycle lanes.

The introduction of a parking charge that is consistent across Limerick is a potential tool to boost city centre footfall levels as well as encourage people to use sustainable transport methods. Introducing a charge for retail shopping parks / centres parking in line with charges in the city centre can reduce the incentive to choose outer-city shopping centres over the city centre, while also discouraging the use of private cars.

# **Parking Recommendations:**

- Include a P&R facility in the Corbally areas in the initial phase of works including the implementation of cycling and walking infrastructure.
- Improve the resources and enforcement of traffic wardens in Limerick to better enforce parking laws and increase accessibility and remove impediments to active travel users.
- Introduce parking charges in outer-city shopping centres and retail parks similar to Limerick City Centre. The current system encourages car use for travel to shopping centres and retail parks and encourages car use because of free parking but also gives these centres and parks competitive advantage over the city centre.

# **Land Use**

Limerick Chamber welcomes the public transport-oriented development (PTOD) approach outlined in the revised draft of the LSMATS. A PTOD approach adopted within the LSMA will not only be critical to the successful implementation of the LSMATS, but will be equally important to adhering to the strategy outlined under the National Planning Framework and decreasing car usage and greenhouse gas emissions.

Limerick Chamber also welcomes the language contained in the draft revised report to facilitate the 15-minute city and revitalise Limerick City Centre while acknowledging that Limerick City Centre is the regional focus for economic, social and cultural activity as well as a prime location for high density residential development.

# Land Use Recommendations:

• Continue to liaise with public landowners in the city centre to find where collaboration and synergies may be obtained in developing public transport nodes and higher density residential developments. It is also critical in this regard that appropriate social services and organisations are put in place in (or in proximity to) these developments such as new schools, medical centres etc.

- Ensure new residential and commercial developments are active travel friendly with the inclusion of sheltered and safe bicycle storage, dedicated EV charging points and spaces as well as space for communal car usage.
- When undertaking population and modelling projections and assessments, remain mindful that national policy under Project Ireland 2040 and the National Planning Framework prioritises growth in brownfield urban areas and not peripheral green field areas throughout the LSMA. This is of critical importance to the future strength of Limerick City Centre as the economic driver of the Mid-West.

# **Modelling / Population Projections**

It is regrettable to see that population projections between the first draft of the LSMATS and revised draft have not changed. Limerick Chamber highlighted the issues in our first draft submission outlining:

"It is therefore a concern that the draft LSMATS places a disproportionate emphasis on current travel patterns and that an undue regard for the status quo still dominates transport policy formulation. While the Chamber recognises that existing residential areas need to see enhanced connectivity, 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 the 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 modelling / projections within the revised draft LSMATS is not reflective of the ambitious language included in the plan to revitalise Limerick City Centre and ensure that it remains the regional focus for economic and other activity.

Under the modelling and population projections, Limerick City Centre is to capture just 3% of overall growth. Out of the 23 metro areas outlined in the modelling / population projections, in terms of share of growth, Limerick City Centre is 17th. Limerick City Centre at 3.2% share of overall growth runs behind Rural (12.4%), Ballinacurra (8.6%), Caherdavin (7.2%), Limerick North-East (7.0%), Dooradoyle (6.4%), Roxboro (5.8%), Limerick North (5.4%), Annacotty (4.9%), Moyross (4.9%), Clareview (4.8%), Shannon (4.6%), South Clare Economic SDZ (4.3%), Castletroy (4.2%), Raheen (3.9%), Mungret (3.7%), and Castleconnell (3.2%).

Given the LSMATS will largely influence where residential developments take place due to proximity to transport infrastructure, it is inappropriate that such a small amount of the share of growth is allocated to the city centre and is not aligned with the stated objective of city revitalisation. The Government's NDP outlines population targets for revitalising city centres. The current population projections in this revised draft have not been updated from the previous draft to reflect this demand. of Limerick City and environs population is expected to grow by c. 50%, then the appropriate adjustments

to population projections must be made to focus more on the city centre. Leaving the projected population growth levels low for Limerick City Centre will only enhance the hollowing out effect that has occurred over the last decade.

The modelling / population projections do not appear to take account of the ambitions and plans for the city centre. Land Development Agency plans for Colbert Quarter outline the potential for a population of 6,300 while the LSMATS outlines a growth for the city centre of just 2,372. On top of this, Limerick Twenty Thirty plans for Cleeves Riverside Campus have the potential to significantly add residential capacity to the city centre. Furthermore, the University of Limerick have significant plans to develop a city centre campus, which may also add residential capacity to the city centre.

From the 2016 data contained in the revised draft LSMATS, Limerick City was the 10th largest settlement within the metro area settlements. In 2040, under the projections in the revised LSMATS data, Limerick City Centre will drop down to the 13th largest settlement. This does not represent the goals for the city outlined in the NPF.



LSMATS: Population Projections (sorted by largest growth areas)

	2016	2040	Population Growth	% Growth	% Share of growth
Rural	15,887	25,062	9,175	58%	12%
Dooradoyle	13,350	18,107	4,757	36%	6%
Limerick North-East	12,344	17,518	5,174	42%	7%
Shannon	10,028	13,404	3,376	34%	5%
Ballinacurra	6,956	13,294	6,338	91%	9%
Roxboro	7,774	12,045	4,271	55%	6%
Limerick North	6,803	10,826	4,023	59%	5%
Caherdavin	5,487	10,820	5,333	97%	7%
Clareview	7,035	10,594	3,559	51%	5%
Moyross	6,918	10,511	3,593	52%	5%
Annacotty	5,497	9,146	3,649	66%	5%
Castletroy	5,998	9,120	3,122	52%	4%
City Centre	6,071	8,443	2,372	39%	3%
Raheen	3,446	6,335	2,889	84%	4%
Castleconnell	3,332	5,722	2,390	72%	3%
University	2,963	4,813	1,850	62%	2%
Sixmilebridge	3,962	4,769	807	20%	1%
Westbury	3,373	4,189	816	24%	1%
Mungret	1,259	3,969	2,710	215%	4%
South Clare Economic SDZ	379	3,534	3,155	832%	4%
Cratloe	1,514	1,792	278	18%	0%
Parteen	1,061	1,338	277	26%	0%
Bunratty	983	1,092	109	11%	0%
Total	132,420	206,443	74,023	56%	

<sup>\*</sup>Figures may be slightly different from NTA LSMATS modelling report due to slight rounding of numbers in LSMATS modelling report

Similarly, for employment, Limerick City Centre was the largest settlement for employment in the metro area as per 2016 data contained in the revised draft LSMATS, by 2040, with the current projections in the LSMATS, Limerick will have dropped to the second largest area for employment being overtaken by Shannon. This is extremely concerning given the significant development plans underway in the city centre as well as national policy design to encourage people to live and work in urban centres.

It is of grave concern that projections suggest that employment levels in Moyross will reduce. With the implementation of a train station in Moyross along with other initiatives, employment is likely to grow. This calls into question the potential impact of a train station in Moyross and how it was factored into modelling and population projections as well as other new infrastructure projects outlined in the revised LSMATS and their impact on areas.

LSMATS: Employment Population Projections (sorted by largest growth areas)

	2016	2040	Population Growth	% Growth	% Share of growth
Ballinacurra	3,219	9,202	5,983	186%	8%
Mungret	286	4,644	4,358	1524%	6%
Shannon	9,839	13,794	3,955	40%	5%
City Centre	9,842	12,749	2,907	30%	4%
Roxboro	3,831	5,143	1,312	34%	2%
Limerick North-East	3,350	4,597	1,247	37%	2%
South Clare Economic SDZ	28	1,136	1,108	3957%	1%
Annacotty	1,484	2,586	1,102	74%	1%
Caherdavin	900	1,836	936	104%	1%
Rural	3,314	4,160	846	26%	1%
University	4,750	5,564	814	17%	1%
Raheen	4,606	5,254	648	14%	1%
Castletroy	767	1,356	589	77%	1%
Dooradoyle	4,840	5,359	519	11%	1%
Limerick North	1,375	1,555	180	13%	0%
Bunratty	479	577	98	20%	0%
Sixmilebridge	229	312	83	36%	0%
Cratloe	207	249	42	20%	0%
Westbury	99	108	9	9%	0%
Parteen	164	172	8	5%	0%
Castleconnell	295	301	6	2%	0%
Clareview	1,544	1,517 -	27	-2%	0%
Moyross	1,562	1,507 -	55	-4%	0%
Total	57,010	83,678	26,668	47%	

<sup>\*</sup>Figures may be slightly different from NTA LSMATS modelling report due to slight rounding of numbers in LSMATS modelling report

LSMATS: Employment Population Projections (sorted by largest growth areas)

	2016	2040	Population Growth	% Growth	% Share of Growth
University	8,916	11,302	2,386	27%	14%
Ballincurra	5,286	6,894	1,608	30%	9%
Rural	2,171	3,685	1,514	70%	9%
Moyross	3,793	5,245	1,452	38%	8%
Limerick North-East	1,919	3,118	1,199	62%	7%
Chaerdavin	484	1,443	959	198%	6%
Doordoyle	1,662	2,598	936	56%	5%
Roxboro	1,883	2,660	777	41%	5%
Limerick North	2,469	3,235	766	31%	4%
City Centre	864	1,582	718	83%	4%
Castletroy	761	1,420	659	87%	4%
Annacotty	1,036	1,693	657	63%	4%
Shannon	2,583	3,200	617	24%	4%
Clare View	2,048	2,627	579	28%	3%
Raheen	706	1,220	514	73%	3%
South Clare Economic SDZ	1	502	501	50100%	3%
Mungret	142	637	495	349%	3%
Castleconnell	196	637	441	225%	3%
Westbury	2	156	154	7700%	1%
Sixmilebridge	379	525	146	39%	1%
Cratloe	258	311	53	21%	0%
Parteen	269	315	46	17%	0%
Bunratty	131	168	37	28%	0%
Total	37,959	55,173	17,214	45%	

<sup>\*</sup>Figures may be slightly different from NTA LSMATS modelling report due to slight rounding of numbers in LSMATS modelling report. There is a further discrepancy between NTA calculation of percentage growth of SDZ and Limerick Chamber calculation of percentage growth.

Regarding education projections, the largest share of expected growth resides in the University area in Castletroy. The Government's NPF states that city centre populations are expected to almost double by 2040. A rise in population in Limerick City Centre will result in more demand for school places and facilities, although the current projections contained within this revised draft do not reflect these expected changes. If Limerick City Centre is to capture its full potential, the necessary infrastructure must be in place or at least be flexible to adapt in line with population growth, this includes educational infrastructure.

A 4% share of the projected education population growth is assigned to Limerick City Centre. The presence of UL's City Centre Campus in the near future will likely bring a wealth of students into the city centre from the Castletroy area. Combined with increased higher education provision, increased school places for first and second level will also be required. To meet the strategic goals outlined in the NPF, education numbers in the city centre must increase beyond that outlined in the revised draft of the LSMATS. This is critical to achieving "measure LU2 – city centre revitalisation" in the revised draft of the LSMATS.

# **Modelling / Population Projections Recommendations:**

• Modelling / population projections need to be amended to reflect ambition for Limerick City Centre and development plans for the city centre. Too much growth is concentrated on suburban and greenfield locations which is not in keeping with the strategic goals of the national planning framework or the stated objective of core density in regional cities.

- Again, we call for the alignment of 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.
- Employment projections also need to be amended, Limerick City while increasing from 2016 to 2040 will drop one place in overall size of employment. This needs to be rectified to reflect existing projects. It is unacceptable that an area like Moyross will not only see no jobs growth to 2040 but will also see a decrease in employment numbers even with the inclusion of a new train station.
- Education population projections do not reflect the Government's NPF guidelines on city centre population growth. A 50% population growth in Limerick City will result in a higher demand for education facilities. The forthcoming UL City Centre campus will also have an impact on the education population in Limerick City Centre, which is not reflected in these projections.

# **Workforce Planning, Monitoring and Implementation**

Skills shortage is a challenge across all sectors. Limerick Chamber believes that an appropriate workforce plan is essential to the successful delivery of LSMATS. i.e. quantifying the additional number of employees required to implement the plan, what areas they need to be hired in, expected additional annual spend in salary, time period for hiring and appointment etc. This is normally beyond the scope of strategy documents; however, Limerick Chamber strongly recommends that an appropriate plan has been put in place between the NTA and other organisations required to deliver the strategy with



Accompanying appropriate funding.

While the implementation plan (page 128 of revised draft) is welcome, Limerick Chamber recommends that more detail be provided for individual projects. For example, "upgrades and improvements to pedestrian infrastructure" is outlined to be complete in the latter half of 2030 but no further information is provided in terms of individual projects to be delivered under this pillar. This project-by-project outline should be included in the final publication of the LSMATS. It is imperative that a project-by-project breakdown by year is provided to ensure accountability of delivery of infrastructure.

Approximately 29% of the measures / deliverables outlined in the LSMATS (c. 23 of 78) are contingent on future feasibility studies, assessments, reviews, needs / demand assessments, investigation of potential etc. Limerick Chamber recommends that these future studies are included in the project-by-project implementation plan and encourage their completion at the earliest possible date to ensure timely implementation of the LSMATS.

Furthermore, the LSMATS should include a provision for data collection and monitoring to identify the impact of new infrastructure, monitor demand and use across the LSMA and identify areas that are in need of improvement. This is also important to analyse if the LSMATS is on track to deliver on its modal share and other targets.

# Workforce Planning, Monitoring and Implementation Recommendations:

- If not completed already, complete an appropriate work force plan for the successful implementation of the LSMATS.
- A more granular implementation plan with yearly delivery should be included in the final publication of the LSMATS outlining start and finish dates on a project-by-project basis – project updates for all projects should also be provided in the six yearly review of the implementation of the LSMATS.
- Ensure future studies are included in project-by-project implementation plan and that they are complete as soon as possible given their importance to strategic goals outlined in the LSMATS.
- Data collection and dissemination on how the LSMATS is achieving its targets should also be included in the revised draft.

# **Remote Working**

While beyond the scope of the LSMATS it is important to highlight the positive role remote working has on society and the environment. A recent report from the Irish Government Economic Evaluation Service (IGEES) and the Department of Enterprise, Trade and Employment found that, with regards remote working, emissions savings made from reduced transport usage are likely to exceed any extra household emissions, leading to a net environmental gain from remote working. The IGEES report estimates that remote working has

the potential to save 164,407 tonnes of CO2 per year with an equivalent monetary saving of €7.6 million. The report further estimates that commuters could save 93 hours per year through reduced commuting. Therefore, it is important, where possible, that the LSMATS supports remote working.

# Conclusion

Limerick Chamber would like to thank the National Transport Authority and other stakeholders for the opportunity to submit our views on the revised draft of the LSMATS. We commend the hard work undertaken by all parties involved and we applaud the ambition contained in the strategy. However, there are a number of areas of concern we feel should be addressed in the final published document, some of these are summarised as follows.

# **Summary of Key Recommendations:**

- In the absence of plans to develop a Limerick Northern Distributor Road over the lifetime of the plan, a slip road, between the Newport / Mackey Roundabout and the National Technology Park should be supported as a matter of urgency in conjunction with Park & Ride/Mobility hubs at both Castletroy and Corbally as well as active and micro-mobility transport options.
- Alternative routes for buses in and around the Georgian centre of Limerick should be identified. Limerick Chamber seeks a review of plans for the operation of O'Connell Street, believing that a stronger case now exists for pedestrianisation of core blocks with a green spine running up the street contributing to enhanced public realm and creating a destination in the heart of the city.
- Undertake a traffic management and delivery plan for Limerick City Centre.
- Utilise the Colbert Station to Foynes line for passenger travel given its ability to link Raheen Industrial Park with other key areas of the city.
- Limerick Chamber recommends that BusConnects be fast-tracked where feasible for the implementation of bus strategy outlined in the revised draft LSMATS within a similar/improved timeframe to that of other cities.
- Population / modelling projections must be revised to reflect a greater emphasis on the city centre reflective of the strategy outlined in Project Ireland 2040.
- A more granular implementation plan should be included in the final publication of the LSMATS outlining start and finish dates on a project-by-project basis – project updates for all projects should also be provided in the six yearly review of the implementation of the LSMATS.
- Ensure future studies are included in project-by-project implementation plan and that they are complete as soon as possible given their importance to strategic goals outlined in the LSMATS.



